

2008-006: Draft specification: Use of specific import authorization (Annex to ISPM 20:2004) - EN

Comm no.	Para no.	Comment type	Comment	Explanation	Country
1.	G	Editorial		Suggest including a sample permit in the draft ISPM (similar to the sample PC that is in ISPM 12)	United States of America
2.	G	Substantive	I support the document as it is and I have no comments		Singapore, Guyana, New Zealand, Ghana
2.	G	Substantive	I support the document as it is and I have no comments		Congo
4.	G	Substantive	Acknowledgement that outcomes defined in this ISPM may require changes to legislation.	The possible requirement of change to legislation could be a challenge of implementation.	Australia
5.	G	Substantive	Another task added: all the contracting parties should published their phytosanitary requirements in their official website and address of all these websites should be listed in this standard. Suggest the draft specification for ISPM written in several extensively used language including Chinese.	In order the exporting parties to easily acquire the detailed phytosanitary requirements of the importing parties. In convenience of review by contracting parties.	China
6.	G	Substantive	"Use" versus "Issuance"	ISPM No. 20 specifies that "general import authorizations" do not need "license" or "permit" of import. Instead "specific import authorization" require of an official consent for import by means of a "license" or "permit". Since only two cases are presented, it is reasonable assume that a "specific import authorization" is equivalent to an "import permit" or "import license". Therefore, it is advisable to prepare guidelines not on the use, but on the issuance of these "specific import authorization". For the above mentioned, it is proposed as title of this ISPM: "Issuance of specific import authorization", and that the content of the specification be adapted to this sense.	OIRSA
7.	G	Substantive		The TCI NPPO is in full support of the addendum to ISPM 20 to establish guidelines for the implementation and use of specific import	Turks and Caicos Islands*

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				authorization. However, we also believe that it should be mandated that Contracting Parties afford each other at least 60 days to make necessary adjustments and consent to any new or revised phytosanitary measure that the importing country may prescribe. Since some measures may demand much (technical and material resources) of the NPPO of the Exporting country; it would be prudent to set an allowable time for bilateral discussions and hopefully subsequent adjustments to phytosanitary requirements.	
8.	1	Editorial	Draft specification for ISPM: Use of specific import authorizations (Annex to ISPM 20:2004 Guidelines for a phytosanitary import regulatory system) (2008-006)	Editorial	United States of America
9.	1	Substantive	Draft specification for ISPM: Issuance Use of specific import authorization (Annex to ISPM 20:2004 Guidelines for a phytosanitary import regulatory system) (2008-006)	ISPM No. 20 specifies that "general import authorizations" do not need "license" or "permit" of import. Instead "specific import authorization" require of an official consent for import by means of a "license" or "permit". Since only two cases are presented, it is reasonable assume that a "specific import authorization" is equivalent to an "import permit" or "import license". Therefore, it is advisable to prepare guidelines not on the use, but on the issuance of these "specific import authorization". For the above mentioned, it is proposed as title of this ISPM: "Issuance of specific import authorization", and that the content of the specification be adapted to this sense.	OIRSA
10.	4	Substantive	Issuance Use of specific import authorization (2008-006).	ISPM No. 20 specifies that "general import authorizations" do not need "license" or "permit" of import. Instead "specific import authorization" require of an official consent for import by means of a "license" or "permit". Since only two cases are presented, it is reasonable assume that a "specific import authorization" is equivalent to an "import permit" or "import license". Therefore, it is advisable to prepare guidelines not on the use, but on the issuance of these "specific import authorization". For the above mentioned, it is proposed as title of this	OIRSA

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				ISPM: "Issuance of specific import authorization", and that the content of the specification be adapted to this sense.	
11.	6	Editorial	Une autorisation d'importer spécifique est un document officiel autorisant l'importation ou le transit d'articles réglementés conformément aux exigences phytosanitaires à l'importation. Certains pays ont recours aux autorisations d'importer spécifiques pour communiquer les exigences phytosanitaires à l'importation relatives à des articles réglementés. Le champ d'application des autorisations d'importer spécifiques est très différent selon les pays. Dans certains pays, eles autorisations d'importer spécifiques sont essentiellement utilisées pour les envois de végétaux importés à des fins particulières (par exemple scientifiques ou de sélection). Dans d'autres pays, les autorisations d'importer spécifiques sont aussi utilisées pour des végétaux ou des produits végétaux destinés à être consommés ou transformés ou pour des végétaux destinés à la plantation. Dans certains cas, selon le système en place, l'utilisation d'une autorisation d'importer spécifique peut être à l'origine d'un manque de clarté et de transparence dans la spécification de l'exigence phytosanitaire à l'importation, auquel cas le pays importateur peut être considéré comme n'étant pas en mesure de s'acquitter de l'obligation contractée au titre de la CIPV de publier ses exigences phytosanitaires à l'importation et les pays exportateurs peuvent estimer difficile d'y répondre.	rajouter la précision pour harmoniser	Algeria
12.	6	Substantive	A specific import authorization is an official document authorizing import or transit of regulated articles in accordance with specified phytosanitary import requirements in legislation. Specific import authorizations are used by some countries to communicate the phytosanitary import requirements for regulated articles. The scope of application of specific import authorization varies significantly between countries. In some countries, these authorizations are used mostly for consignments of plants imported for special purposes (e.g. scientific or breeding). In other countries, specific import authorizations are also used for plants or plant products for consumption or processing or for plants for planting. Depending on the system in place, the use of specific import authorization can lead to a lack of clarity and transparency in specifying the phytosanitary import requirements. If this is the case, the importing country may be deemed unable to fulfil its IPPC obligation to publish its phytosanitary import requirements, and exporting countries may find it difficult to meet the phytosanitary import requirements of that country.	1.There should be stated in legislation that country use import authorisation system and only after that requirements can be specified in import permit. Otherwise exporter does not know that import permit is needed for exportind consignment to specific coutry. 2.If problem is detected and enlightened of not meeting the requirements, the guidance what to do to improve that should be given.	Latvia

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			Therefore if this is a case there is a need to improve and amend the legislation to fulfil IPPC obligations by adding more information of requirements.		
13.	6	Substantive	A specific import authorization is an official document authorizing import or transit of regulated articles in accordance with specified phytosanitary import requirements. The scope and application of specific import authorizations varies significantly between (or among) countries. Specific import authorizations are used by some countries to communicate the phytosanitary import requirements for regulated articles. The scope of application of specific import authorization varies significantly between countries. Some in some countries, use these authorizations are used mostly for consignments of plants imported for specific special purposes (e.g. scientific or breeding). In other countries, use specific import authorizations are also used for plants or plant products for consumption or processing or for plants for planting. Depending on the system in place, the use of specific import authorization can lead to a lack of clarity and transparency in specifying the phytosanitary import requirements. If this is the case, the importing country may be deemed unable to fulfil its IPPC obligation to publish its phytosanitary import requirements, and exporting countries may find it difficult to meet the phytosanitary import requirements of that country. Specific guidance on the application of specific import authoriz ations would increase clarity, transparency and understanding of a country's phytosanitary import requirements.	Suggest defining the term "import authorizations" and how this differs from "import permits". For the sentence begining with "depending on the system in place" we suggest it be reworded as "Specific guidance on the application of specific import authorizations"	United States of America
14.	6	Substantive	Une autorisation d'importer spécifique est un document officiel autorisant l'importation ou le transit d'articles réglementés conformément aux exigences phytosanitaires à l'importation. Certains pays ont recours aux autorisations d'importer spécifiques pour communiquer les exigences phytosanitaires à l'importation relatives à des articles réglementés. Le champ d'application des autorisations d'importer spécifiques est très différent selon les pays. Dans certains pays, ces autorisations sont essentiellement utilisées pour les envois de végétaux importés à des fins particulières (par exemple scientifiques ou de sélection). Dans d'autres pays, les autorisations d'importer spécifiques sont aussi utilisées pour des végétaux ou des produits végétaux destinés à être consommés ou transformés ou pour des végétaux destinés à la plantation. Dans certains cas, selon le système en place, l'utilisation d'une autorisation d'importer spécifique peut être à	non justifié	Algeria

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			l'origine d'un manque de clarté et de transparence dans la spécification de l'exigence phytosanitaire à l'importation, auquel cas le pays importateur peut être considéré comme n'étant pas en mesure de s'acquitter de l'obligation contractée au titre de la CIPV de publier ses exigences phytosanitaires à l'importation et les pays exportateurs peuvent estimer difficile d'y répondre.		
15.	6	Technical	A specific import authorization is an official document authorizing import or transit_of regulated articles in accordance with specified phytosanitary import requirements. Specific import authorizations are used by some countries to communicate the phytosanitary import requirements for regulated articles. The scope of application of specific import authorization varies significantly between countries. In some countries, these authorizations are used mostly for consignments of plants imported for special purposes (e.g. scientific or breeding, biological control agents, etc(2)). In other countries, specific import authorizations are also used for plants or plant products for consumption or processing or for plants for planting. Depending on the system in place, the use of specific import authorization can lead to a lack of clarity and transparency in specifying the phytosanitary import requirements. If this is the case, the importing country may be deemed unable to fulfil its IPPC obligation to publish its phytosanitary import requirements, and exporting countries may find it difficult to meet the phytosanitary import requirements of that country.	Transit does not imply import independently that they need to be authorized and controlled. It is important to mention biological control agents as another example because specific authorizations are common for them.	COSAVE, Brazil, Uruguay, Peru, Argentina, Chile
16.	6	Technical	A specific import authorization is an official document authorizing import or transit of regulated articles in accordance with specified phytosanitary import requirements. Specific import authorizations are used by some countries to communicate the phytosanitary import requirements for regulated articles. The scope of application of specific import authorization varies significantly between countries. In some countries, these authorizations are used mostly for consignments of plants imported for special purposes (e.g. scientific or breeding, biological control agents, ect (2)). In other countries, specific import authorizations are also used for plants or plant products for consumption or processing or for plants for planting. Depending on the system in place, the use of specific import authorization can lead to a lack of clarity and transparency in specifying the phytosanitary import requirements. If this is the case, the importing country may be deemed unable to fulfil its IPPC obligation to publish its phytosanitary import requirements, and exporting countries may find it difficult to meet the phytosanitary import	Transit does not imply import independently that they need to be authorized and controlled. It is important to mention biological control agents as another example because especific authorizations are common for them.	Paraguay

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17.	7	Editorial	requirements of that country. ISPM 20:2004 (<i>Guidelines for a phytosanitary import requirement regulatory system</i>) refers to the use of specific import authorization; however, no detailed guidance for its use is provided. It is important to have internationally agreed guidance for the use of specific import authorization to ensure that the systems associated with it follow the principles of transparency, minimal impact and non-discrimination.	Titles of ISPMs, and not only their number, are usually given in specifications.	EPPO, European Union, Georgia, Azerbaijan
18.	7	Editorial	ISPM 20:2004 refers to the use of specific import authorizations; however, no detailed guidance for their use is provided. It is important to have internationally agreed guidance for the use of specific import authorizations to ensure that the systems associated with it follow the principles of transparency, minimal impact and non-discrimination.	This paragraph could be integrated with paragraph 6	United States of America
19.	7	Editorial	La NIMP 20:2004(Directives pour un système phytosanitaire de reglement ation des importations) se réfère à l'utilisation d'autorisations d'importer spécifiques, sans toutefois donner d'indications précises à ce sujet. La définition au plan international d'orientations relatives aux autorisations d'importer spécifiques est importante, car celles-ci garantissent que les systèmes concernés sont régis par des principes de transparence, d'impact minimal et de non-discrimination.	rajouter l'intitulé complet de la NIMP 20	Algeria
20.	8	Editorial	The development of general import authorizations is encouragead whenever specific import authorizations become generally applicable; for example, when the requirements of specific import authorizations become routine. Guidance is therefore needed on how and under which circumstances specific import authorization could be developed into a general import authorization.	Editorial	United States of America
21.	8	Substantive	The development of general import authorization is encouraged whenever specific import authorizations become generally applicable; for example, when the requirements of specific import authorizations become routine. Guidance is therefore needed on how and under which circumstances		

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23.	8	Technical	The development of general import authorization is encouraged whenever <u>similar</u> specific import authorizations become generally applicable; for example, when the requirements of specific import authorizations become routine. Guidance is therefore needed on how and under which circumstances specific import authorization could be developed into general import authorization.	For consistency with ISPM 20.	Paraguay
24.	10	Editorial	The annex to the standard would apply to national plant protection organizations (NPPOs) that use specific import authorizations to specify their phytosanitary import requirements. The standard should create a harmonized framework for the use of specific import authorizations by specifying situations when they it may be used.	Editorial	United States of America
25.	10	Editorial	The annex to the standard would apply to national plant protection organizations (NPPOs) that use specific import authorizations to specify some of their phytosanitary import requirements. The standard should create a harmonized framework for the use of specific import authorization by specifying situations when it may be used.	Add the words "some of" to the first sentence to clarify that this standard would apply to NPPOs that use both general and specific import authorizations to provide their phytosanitary import requirements and not solely those that use specific import authorization exclusively.	Canada
26.	10	Substantive	The annex to the standard would apply to national plant protection organizations (NPPOs) that use specific import authorizations to specify their phytosanitary import requirements. The standard should create a harmonized framework for the use of specific import authorization by specifying situations when it may be used.	Annex may guide issuance of plant import permits, which sometimes is not transparent, hence offer justifiable scenarios when to issue the permits versus when to publish the import requirements and share them with trading partners	Kenya
27.	12	Editorial	The annex should provide guidance on the aspects of the use of specific importthese authorizations, which should be taken into account to ensure that the principles of transparency, minimal impact and non-discrimination are followed. Guidance on circumstances under which specific import authorization could be developed into general import authorization should be included.	The Scope should be able to stand on its own, and thus avoid the word "these" to that effect.	EPPO, European Union, Georgia, Azerbaijan
28.	12	Editorial	The annex should provide guidance on the aspects of the use of these authorizations, which should be taken into account to ensure that the principles of transparency, minimal impact and non-discrimination are followed. Guidance on circumstances under which specific import authorizations could be developed into general import authorizations should be included.	Edits	United States of America
29.	12	Editorial	L'annexe devrait donner des orientations sur les aspects de l'utilisation des ees autorisations d'importer spécifiques, qui devraient être pris en compte de telle sorte que les principes de transparence, d'impact minimal et de non-discrimination soient respectés. Des indications quant aux circonstances dans lesquelles une autorisation d'importer	l'annexe concerne les autorisations d'importer spécifiques, il faudra toujours préciser "spécifique" dans tout le texte	Algeria

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			spécifique donnée pourrait être transformée en autorisation d'importer générale devraient y figurer.		
30.	12	Substantive	The annex should provide guidance on the aspects of the use of these authorizations, which should be taken into account to ensure that the principles of transparency, minimal impact and non-discrimination are followed. Guidance on circumstances under which specific import authorization could be developed into general import authorization should be included.	Regarding the US comment from paragraph 6 on defining "import authorizations", the definition could entered here, under the Scope section.	United States of America
31.	12	Substantive	The annex should provide guidance on the aspects of the use of these authorizations, which should be taken into account to ensure that the principles of transparency, minimal impact and non-discrimination are followed. Guidance on circumstances under which specific import authorization could be developed into general import authorization should be included.	The meaning of the term "general import authorization" is not clear. So the term "general import authorisation" should be defined in the glossary of phytosanitary terms (ISPM 5) for clarity.	South Africa
32.	14	Substantive	The expert working group (EWG) should undertake the following tasks: 1) To define the term specific improt authorization.	Propose that one of the purpose of the EWG should be to define the term "specific import authorization". It is not clear whether the term "specific import authorisation" is synonymous with phytosanitary import requirements", so it should be defined in ISPM 5 as used in paragraph 6 for clarity on when this term should be applied.	South Africa
33.	15	Substantive	1) analyse the provisions for specific import authorization in existing ISPMs 1.a) describe how import authorisation should be built in the country and by whom (NPPO). What should be done in all cases and what in specific cases? How it should be managed and controled.	System and how it works should be described. So far there is only tasks about the need to analyse import authorisation in ISPMs and considerations of specific forms for document, need for examples, but it is not clear how system should work. There is also nothing about control.	Latvia
34.	16	Editorial	2) consider the current use of different forms of specific import authorizations (e.g. licences or permits) as well as types of commodities for which they are used and the need to harmonize their use, including the elements of the authorizations, the scope of regulated articles for which the authorizations are used, options for electronic authorizations, non phytosanitary requirements, and addressees of the authorizations	The part suggested for deletion seems to be redundant with the words "as well as types of commmodities for which they are used".	EPPO
35.	16	Editorial	2) consider the current use of different forms of specific import authorizations (e.g. licences or permits) as well as types of commodities for which they are used and the need to harmonize their use, including the elements of the authorizations, the scope of regulated articles for	The part suggested for deletion seems to be redundant with the words "as well as types of commmodities for which they are used".	European Union

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			which the authorizations are used, options for electronic authorizations, and addressees of the authorizations		
34.	16	Editorial	2) consider the current use of different forms of specific import authorizations (e.g. licences or permits) as well as types of commodities for which they are used and the need to harmonize their use, including the elements of the authorizations, the scope of regulated articles for which the authorizations are used, options for electronic authorizations, non phytosanitary requirements, and addressees of the authorizations	The part suggested for deletion seems to be redundant with the words "as well as types of commmodities for which they are used".	Georgia, Azerbaijan
37.	16	Substantive	2) consider the current use of different forms of specific import authorizations (e.g. licences or permits) as well as types of commodities for which they are used. 3) Based on the findings in 2), decide which elements of specific import authorizations would benefit from harmonisation and specific guidance and the need to harmonize their use, including the elements of the authorizations, the scope of regulated articles for which the authorizations are used, options for electronic authorizations, and addressees of the authorizations	Suggest task 2) be divided into two separate tasks	United States of America
38.	16	Substantive	2) consider the current use of different forms of specific import authorizations (e.g. licences or permits) as well as types of commodities for which they are used and the need to harmonize their use, including the elements of the authorizations, the scope of regulated articles for which the authorizations are used, options for electronic authorizations, and addressees of the authorizations To add new task: Consider the inclusion of guidance on the period of validity of specific import authorizations as an operational issue, taking into account the travel time from the exporting country and the issuance date and validity of the phytosanitary certificate	When travel time is too long, the date of the specific import authorization may be expired upon arrival of the consignment to the importing country, even when consignments are accompanied by a Phytosanitary Certificate issued when the specific import authorization is still valid. Furthermore, the phytosanitary certificate could be issued once the specific import authorization has expired, so should also be considered guidance to avoid this situation.	COSAVE, Brazil, Uruguay, Peru, Argentina, Chile
39.	16	Substantive	2) consider the current use of different forms of specific import authorizations (e.g. licences or permits) as well as types of commodities for which they are used and the need to harmonize their use, including the elements of the authorizations, the scope of regulated articles for which the authorizations are used, options for electronic authorizations, and addressees of the authorizations To add new task: Consider the inclusion of guidance on the period of validity of specific import authorizations as an operational issue, taking	When travel time is too long, the date of the specific import authorization may be expired upon arrival of the consignment to the importing country, even when consignments are accompanied by a Phytosanitary Certificate issued when the specific import authorization is still valid. Furthermore, the phytosanitary certificate could be issued once the specific import authorization has expired, so should also be considered guidance to avoid this situation.	Paraguay

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			into account the travel time from the exporting country and the issuance date and validity of the phytosanitary certificate.		
40.	16	Technical	2) consider the current use of different forms of specific import authorizations (e.g. licences or permits) as well as types of commodities for which they are used and the need to harmonize their use, including the elements of the authorizations, the scope of regulated articles for which the authorizations are used, options for electronic authorizations, need to deal only with phytosanitary requirements, and addressees of the authorizations	Authorizations should focus only on phytosanitary requirements.	European Union
41.	17	Substantive	3) consider how the use of specific import authorization may affect the implementation of the obligation of contracting parties to publish their phytosanitary import requirements. If problems detected, how country should improve that and what to do in such cases.	The should be guidelines on how to act in problematic cases when problem is detected.	Latvia
42.	17	Substantive	3) consider how the use of specific import authorization may affect the implementation of the obligation of contracting parties to publish their phytosanitary import requirements. and how these authorizations relate to the published general requirements.	There should be guidelines on how to act when a problem is detected. Transparency, non-discrimination and minimal impact are mentionned as general principles of the IPPC Convention, and mechanisms for the implementation thereof should be mentionned and established.	EPPO, European Union, Georgia, Azerbaijan
			3b) In relation to problems identified in points 1 to 3 above, guidance should be devellopped on possible improvements including mechanisms for ensuring transparency, non-discrimination and minimal impact.		
43.	17	Substantive	3) consider how the use of specific import authorization may affect the implementation of the obligation of contracting parties to publish their phytosanitary import requirements and provide guidance on using specific import authorization in a transparent way.	Add the phrase "and provide guidance on using specific import authorization in a transparent way." as an additional part of this task. International harmonization on how to use specific import authorization transparently would be beneficial.	Canada
44.	17	Substantive	3) consider how the use of specific import authorization may affect the implementation of the obligation of contracting parties to publish their phytosanitary import requirements and describe how the influence can be minimized.	It is imperative to describe guidance or recommendation on how to minimize the negative effect on transparency with regard to import phytosanitary requirements by licenses or permits, based on the consideration of negative impact.	Japan
45.	18	Editorial	4) describe examples of situations in international trade when the use of specific import authorizations may be appropriate required (e.g. types of commodities as well as their origin, their intended use and the potential risks associated with them) as indicated in ISPM 20:2004 as well as describe other examples as appropriate	In order to clearly express that this sentence is about guidance, and not only analysis, general cases should be given as well as examples.	EPPO, European Union, Georgia, Azerbaijan

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46.	18	Editorial	4) décrire des exemples de situations, dans les échanges internationaux, dans lesquelles des autorisations d'importer spécifiques peuvent être exigées (par exemple sur les types de marchandise, l'origine des marchandises, l'usage auquel celles-ci sont destinées et les risques potentiels qui y sont liés) comme indiqué dans la NIMP 20:2004, et décrire d'autres exemples pertinents;	plus de clarté	Algeria
47.	18	Substantive	4) describe examples of situations in international trade when specific import authorizations may be required (e.g. types of commodities as well as their origin, their intended use and the potential risks associated with them) and identify the criteria where such specific import authorization is required and validated as indicated in ISPM 20:2004 as well as describe other examples as appropriate (Add the following paragraph) 5) Consider minimum requirements to be described in official document of specific authorization and propose a standard model of specific import authorization	The criteria of specific import authorization is useful for the contracting parties as well as necessary for the principles of transparency non-discrimination and the avoidance of disguised restrictions as described in the IPPC. Currently different forms of the import authorizations are used depending on the importing countries, which may reduce transparency with regard to the import requirements before import application. Guidance on criteria where specific import authorization is required and validated, and standard model of specific import authorization should be useful.	Japan
48.	18	Technical	4) describe examples of situations in international trade when specific import authorizations may be required (e.g. types of commodities as well as their origin, their intended use and the potential pest 'risks associated with them) as indicated in ISPM 20:2004 as well as describe other examples as appropriate	For consistency with ISPM 5.	COSAVE, Uruguay, Peru, Argentina, Chile
49.	18	Technical	4) describe examples of situations in international trade when specific import authorizations may be required (e.g. types of commodities as well as their origin, their intended use and the potential pest risks associated with them) as indicated in ISPM 20:2004 as well as describe other examples as appropriate	For consistency with ISPM 5.	Paraguay
50.	19	Technical	5) provide guidance on the circumstances under which specific import authorization could be developed into general import authorization (e.g. when requirements in the specific import authorizations become routine)	The idea is not clear. It should be clearlier explained the needed task here.	Latvia
51.	20	Substantive	6) identify the responsibilities of NPPOs of both importing and exporting countries in relation to specific import authorization and describe how the NPPO should establish and manage specific import authorizations systems when appropriate, and how specific import authorizations are communicated to NPPOs.	Describing possible situations or actions is not enough. General systems for these actions or possibilities must also be described.	EPPO

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52.	20	Substantive	6) identify the responsibilities of NPPOs of both importing and exporting countries in relation to specific import authorization and describe how the NPPO of the importing country shou ld establish and manage specific import authorizations systems when a ppropriate, and how specific import authorizations are communicated to NPPOs of exporting countries.	Describing possible situations or actions is not enough in a specification. General systems for these actions or possibilities must also be described.	European Union
53.	24	Substantive	Funding for the meeting may be provided from sources other than the regular programme of the IPPC (FAO). As recommended by ICPM-2 (1999), whenever possible, those participating in standard setting activities voluntarily fund their travel and subsistence to attend meetings. Participants may request financial assistance, with the understanding that resources are limited and the priority for financial assistance is given to developing country participants.	This draft could be developed by electronic means instead of an EWG.	COSAVE, Brazil, Uruguay, Paraguay, Peru, Argentina, Chile
54.	30	Substantive	Five to seven phytosanitary experts with expertise in the development of phytosanitary import requirements and authorization (general and specific import authorization).	More appropriate	United States of America
55.	30	Technical	Five to seven phytosanitary experts with expertise in the development of phytosanitary import requirements (general and specific import authorization) and with expertise in meeting those requirements as NPPOs of exporting countries.	Experts with experience of both importion and exportation procedures should be included.	EPPO, European Union, Georgia, Azerbaijan
56.	34	Substantive	The IPPC, relevant ISPMs and other national, regional and international standards and agreements as may be applicable to the tasks, and discussion papers submitted in relation to this work. ISPM 20: 2004. Guidelines for a phytosanitary import regulatory system.	For consistency with other specifications the main ISPM to be considered should be specified	COSAVE, Brazil, Uruguay, Peru, Argentina, Chile
57.	34	Substantive	The IPPC, relevant ISPMs and other national, regional and international standards and agreements as may be applicable to the tasks, and discussion papers submitted in relation to this work. ISPM 20: 2004. Guidelines for a phytosanitary import regulatory system.	For consistency with other specifications the main ISPM to be considered should be specified	Paraguay