



联合国
粮食及
农业组织

Food and Agriculture
Organization of the
United Nations

Organisation des Nations
Unies pour l'alimentation
et l'agriculture

Продовольственная и
сельскохозяйственная организация
Объединенных Наций

Organización de las
Naciones Unidas para la
Alimentación y la Agricultura

منظمة
الغذية والزراعة
للأمم المتحدة

COMMISSION ON PHYTOSANITARY MEASURES

Tenth Session

Rome, 16-20 March 2015

**Adoption of International Standards for Phytosanitary Measures -
Conceptual flaws with the Draft ISPM “Determination of host status of
fruit to fruit flies (Tephritidae)” presented to CPM-10 for adoption**

Agenda item 8.2 (Re: CPM 2015/06_01)

Prepared by the United States of America

Conceptual flaws with the Draft ISPM “Determination of host status of fruit to fruit flies (Tephritidae)” presented to CPM-10 for adoption

The United States has several concerns with the draft ISPM “Determination of host status of fruit to fruit flies (Tephritidae)” presented for adoption by CPM-10 (2015). The draft, as presented, was substantially modified by the Standards Committee (SC) in November 2014 in response to the formal objections from CPM-9 (2014), and contracting parties had no opportunity for another round of the substantial concerns commenting period, typically given to draft standards before they are recommended to the CPM.

Serious conceptual shortcomings in the draft have resulted from the substitution of the term “semi-natural host” for the term “conditional host”. These terms are not synonymous and with this change, the draft ISPM includes poorly defined concepts that are of little use to plant health regulators, who are the intended audience of ISPMs. The draft uses the term “semi-natural host” which only provides guidance to scientists on how to conduct trials to determine whether certain species of fruits (or vegetables) are hosts for fruit flies. However, the draft now fails to provide guidance to the phytosanitary community about **conditions** under which traded commodities (“conditional hosts”) should be subject to regulatory actions.

Several regions of the world use the concept of “conditionality” of hosts. “Conditionality” relates to whether hosts are infested **in the field** and under which defined conditions. Conditions that occur in the field affect whether infestation takes place. These conditions can be specified and described in order to develop effective, justifiable, least trade restrictive, and transparent risk mitigations. The draft standard does not adequately describe or address this concept. Removal of the definition “conditional host” leads to omission of a large category of scenarios whether a commodity is not a host in the field, which creates the bases for the existing regulations. Use of terminology in this standard could conflict with or have implications for a future broad concept standard on host status.

Conditions relevant to regulators that affect host status include but are not limited to the degree of maturity, seasonality of production, specific variety produced, fruit harvested from the tree rather than picked from the ground, commercial versus backyard production, absence or presence of other fly hosts, etc. (see below for specific country/ commodity examples).

Examples below are from the existing trade between the United States of America and multiple countries importing their plant products into the US. Types of conditions when **the commodity is NOT a host for fruit fly in the field** are in **bold**:

- **Degree of maturity** (i.e., size, color, firmness, ripeness)
 - Tomatoes (green) are permissible in most cases without restrictions while pink and red are not allowed or require additional safeguards or treatments against fruit fly (e.g., El Salvador, Guatemala, Honduras, Nicaragua)
 - Lemons colored green allowed without quarantine treatment (Spain, Uruguay)
 - Bananas upon arrival by air must be (green) or yellow and firm if arrived by boat (Cook islands, Philippines, Samoa, Tonga)
 - Papayas have to be light green and less than half ripe (Central and South America)
 - Baby squash and baby courgettes from Zambia (size is not to exceed certain dimensions)
- **Specific variety allowed without treatment**
 - Hass avocado from Mexico, Peru
 - Verna and Fino lemons from Spain
- **Seasonality** of production is based on low fly prevalence

- Lemons from Uruguay (May 15-August 31)
- Tomatoes from Spain (December 1- April 30)
- **Tree harvested** rather than picked from the ground
 - Papaya from Central and South America
 - Clementine from Spain
 - Avocado from Mexico
 - Most of the commercially produced fruit
- **Commercial production** vs back yard (most of the traded commodities are commercially grown)
- **Absence or presence of other fly hosts**
 - Tomatoes from ECOWAS countries, Morocco (requires fruit fly hosts distance from production and packing areas)
 - Baby squash from Zambia (same as above)
- Conditional host status is a part of the Systems approaches – multiple regulations:
 - Tomatoes from Chile
 - Avocados from Mexico
 - Cape gooseberries from Colombia
 - Citrus from Uruguay

This draft, if adopted in its current state, would undermine and confuse the existing phytosanitary regulations that allow the products above to be imported into the U.S. based on the commodities' status of "conditional" host or non-host.