



Proposed draft CPM Recommendation on the importance of pest diagnosis

Comm no.	Para no.	Comment type	Comment	Explanation	Country
1.	G	Editorial	Jamaica support the importance of pest diagnosis and is committed to improving our capabilities in Jamaica and within the Caribbean region.	Draft timely and very important.	Jamaica
2.	G	Substantive	I support the document as it is and I have no comments		Georgia, Lao People's Democratic Republic, European Union, Mexico
3.	G	Substantive	New Zealand suggests the deletion of paras 18 - 27.	New Zealand believes that Recommendations are for CPM members not RPPOs or the IPPC Secretariat. If the points in paras 18-27 are essential they should be rephrased as recommendations for CPM members.	New Zealand
4.	G	Substantive	Japan supports the proposed draft CPM Recommendation on the importance of pest diagnosis with the understanding that pest diagnosis is one of the fundamental phytosanitary activities to achieve the IPPC objectives. It should be taken into account that international standardization is not only way to increase the accessibility and acceptability of diagnostic services since there would be more efficient and effective approaches than development of ISPM27 that requires much resources and time, for example sharing existing common diagnostic protocols used by the NPPOs and the RPPOs through the IPPC Phytosanitary Resources Pages.	.	Japan
5.	3	Substantive	Pest diagnosis is a cross-cutting issue that underpins most IPPC activities. Contracting parties regularly undertake pest diagnoses, for example to support export certification, import inspections, pest surveillance and eradication programmes.	The addition of this information is suggested to draw attention to the fact that modern methods, especially molecular methods, are not available to diagnosticians in many countries – because of lack of infrastructure or skills.	Australia

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			<u>The diagnosis of some pests is particularly challenging because of the modernisation of taxonomic concepts and the diagnostic opportunities provided by new technologies.</u>		
6.	3	Substantive	Pest diagnosis is a cross-cutting issue that underpins most <u>International Plant Protection Convention (IPPC)</u> activities. Contracting parties regularly undertake pest diagnoses, for example to support export certification, import inspections, pest surveillance and eradication programmes.	This is the first time IPPC is used in the document and should therefore be defined.	Canada
7.	4	Editorial	The results of the general survey of implementation of the Convention and its standards by the IRSS and other IRSS surveys indicate there is a general problem with access to diagnostic support <u>can be improved</u> . This would assist <u>undermines the ability of</u> some countries to undertake surveillance, determine pest status, undertake pest risk analysis etc. This is a fundamental issue that countries and the IPPC should address.	Editorial	Australia
8.	4	Substantive	The results of the general survey of implementation of the Convention and its standards by the <u>Implementation Review and Support System (IRSS)</u> and other IRSS surveys indicate there is a general problem with access to diagnostic support. This undermines the ability of some countries to <u>effectively prevent entry of quarantine pests into their country and certify freedom from quarantine pests of other countries</u> , undertake surveillance, determine pest status, undertake pest risk analysis etc. This is a fundamental issue that contracting parties <u>countries</u> and the IPPC should address.	This is first time Implementation Review and Support System is used in the document and therefore it should be spelled out. Ability to conduct phytosanitary activities at import and for export are also affected by pest diagnosis. As this document is a Recommendation by CPM it should be addressed to contracting parties rather than countries.	Canada
9.	4	Technical	The results of the general survey of implementation of the Convention and its standards by the IRSS and other IRSS surveys indicate there is a general problem with access to <u>the need of</u> diagnostic support. This undermines the ability of some countries to undertake surveillance, determine pest status, undertake pest risk	It can not be assume from surveys that it is general problem but the need of diagnostics support.	Uruguay, Brazil, Argentina

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			analysis etc. This is a fundamental issue that countries and the IPPC should address.		
10.	5	Editorial	In addition to supporting individual problems within countries, many regions have identified a general trend in reduced expertise in core scientific disciplines, such as the taxonomy of pests, and classical diagnostic skills.	editorial	Australia
11.	5	Substantive	In addition to problems within countries, many regions have identified a general trend in reduced expertise in core scientific disciplines, such as the taxonomy of pests, and classical diagnostic skills.	The paragraph refers to EPPO statement cited in CPM 2015/CRP/03, therefore from only one region. Such statement is not the result from IRSS survey.	Uruguay, Brazil, Argentina
12.	6	Substantive	Recommendation <u>Addressed to:</u> <u>Contracting parties, National Plant Protection Organizations (NPPOs), Regional Plant Protection Organizations (RPPOs) and the IPPC Secretariat.</u>	Addition suggested for consistency with previous Recommendations	Canada
13.	7	Substantive	The CPM agrees to: <ul style="list-style-type: none"> <u>adopt a strategic approach to diagnostic protocol development through:</u> <u>Maintaining a stocktake of protocol development through NPPOs, RPPOs and the IPPC. Protocols are accessed via a link to the owners resource page</u> <u>Identifying gaps in diagnostic capability for a pest or group of pests; and</u> <u>Identifying and supporting appropriate collaborators to develop a diagnostic protocol for adoption.</u> 	A more strategic approach by the IPPC to global coordination of diagnostic protocol development would minimise duplication of resources that currently exists between the IPPC, RPPOs and NPPOs and identify key beneficiaries of the development process. Such an approach encourages harmonisation of methods as well as formal endorsement of protocols. Supporting participation of experts from targeted NPPOs and RPPOs would assist in meeting IPPC objectives in relation to diagnostics. An example of the SPHD stocktake is at http://plantbiosecuritydiagnostics.net.au/resource-hub/priority-pest-diagnostic-resources/	Australia

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14.	7	Substantive	The CPM agrees to:	Suggest that paragraphs [7]-[10] should be deleted since they are short-term strategic objectives and not appropriate for a Recommendation. Instead these could be proposed as a CPM decision and recorded in the CPM report.	Canada
15.	7	Substantive	The CPM agrees to:	Paragraphs 7, 8, 9 and 10 are not part of the CPM recommendation. It has no sense the CPM recommend to itself that "CPM agrees". Considerations in paragraphs 8, 9 and 10 refer to decisions that should be made during the CPM.	Uruguay, Brazil, Argentina
16.	8	Substantive	<ul style="list-style-type: none"> consider and seek the best approach to ensure the accessibility of diagnostic protocols and diagnostic support <u>and the continued development of taxonomic expertise as a core scientific discipline to support the functions of IPPC.</u> 	The focus on declining taxonomic expertise needs to be highlighted internationally to push countries to focus their efforts to develop this expertise as without which, the basis of diagnostic support undermining IPPC work will be affected. Currently, there is nothing in the recommendations to address this point.	Singapore
17.	8	Substantive	<ul style="list-style-type: none"> consider and seek the best approach to ensure the accessibility of <u>diagnostic skills</u>, diagnostic protocols and diagnostic support 	To use protocols competently there is a need to have a high level of competency in diagnostic skills. Protocols are problematic as they can be only narrowly applied and are rarely able to give a definitive answer. We do not have the same comprehensive knowledge of the pests that affect plants equivalent to the vets who have agreed protocols that by and large work world wide.	Australia
18.	8	Substantive	<ul style="list-style-type: none"> consider and seek the best approach to ensure the accessibility of diagnostic protocols and diagnostic support 	Suggest that paragraphs [7]-[10] should be deleted since they are short-term strategic objectives and not appropriate for a Recommendation. Instead these could be proposed as a CPM decision and recorded in the CPM report.	Canada
19.	8	Substantive	<ul style="list-style-type: none"> consider and seek the best approach to ensure the accessibility of diagnostic protocols and diagnostic support 	Paragraphs 7, 8, 9 and 10 are not part of the CPM recommendation. It has no sense the CPM recommend to itself that "CPM agrees". Considerations in paragraphs 8, 9 and 10 refer to decisions that should be made during the CPM.	Uruguay, Brazil, Argentina
20.	9	Substantive	<ul style="list-style-type: none"> further investigate how far international standardization could improve the acceptability of diagnostic services and results by enhancing confidence in them 	It would be useful to see if diagnostic protocols as ISPMs are being used globally before a decision is made to develop more protocols and an implementation programme.	Australia

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			<ul style="list-style-type: none"> <u>consider reviewing the use of diagnostic protocols being developed as ISPMs</u> 		
21.	9	Substantive	<ul style="list-style-type: none"> further investigate how far international standardization could improve the acceptability of diagnostic services and results by enhancing confidence in them 	Suggest that paragraphs [7]-[10] should be deleted since they are short-term strategic objectives and not appropriate for a Recommendation. Instead these could be proposed as a CPM decision and recorded in the CPM report.	Canada
22.	9	Substantive	<ul style="list-style-type: none"> further investigate how far international standardization could improve the acceptability of diagnostic services and results by enhancing confidence in them 	Paragraphs 7, 8, 9 and 10 are not part of the CPM recommendation. It has no sense the CPM recommends to itself that "CPM agrees". Considerations in paragraphs 7, 8, 9 and 10 refer to decisions that should be made during the CPM	Uruguay
23.	10	Substantive	<ul style="list-style-type: none"> investigate if how pest diagnosis could become a future implementation programme <u>pending outcomes of review</u>. 	The outcomes of a review of the use of diagnostic protocol ISPMs would guide whether there was a need for an implementation program.	Australia
24.	10	Substantive	<ul style="list-style-type: none"> investigate how pest diagnosis could become a future implementation programme. 	Suggest that paragraphs [7]-[10] should be deleted since they are short-term strategic objectives and not appropriate for a Recommendation. Instead these could be proposed as a CPM decision and recorded in the CPM report.	Canada
25.	10	Substantive	<ul style="list-style-type: none"> investigate how pest diagnosis could become a future implementation programme. 	Paragraphs 7, 8, 9 and 10 are not part of the CPM recommendation. It has no sense the CPM recommend to itself that "CPM agrees". Considerations in paragraphs 8, 9 and 10 refer to decisions that should be made during the CPM.	Uruguay, Brazil, Argentina
26.	12	Substantive	<ul style="list-style-type: none"> ensure there are adequate laboratory facilities and expertise to support pest diagnostic <u>and taxonomic</u> activities underpinning phytosanitary activities 	Taxonomy is different to diagnostics	Australia
27.	13	Substantive	<ul style="list-style-type: none"> allocate sufficient resources to develop and maintain such capability 	This text is already included in para 12 due to there is no possibility to "ensure adequate laboratory facilities" if no resources are available. Furthermore it is a matter of countries how they assign resources (and the possibility to do it)	Argentina

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28.	14	Substantive	<ul style="list-style-type: none"> share knowledge and expertise with other countries where possible, for example by making places available on training programmes, opening access to proficiency testing or publicising examples of best laboratory practice, <u>encourage publication of diagnostic and taxonomic works relating to phytosanitary activities in appropriate peer reviewed journals, in particular in open access formats</u> 	This will make the material available and validated worldwide.	Australia
29.	14	Substantive	<ul style="list-style-type: none"> share knowledge and expertise with other NPPOscountries where possible, for example by making places available on training programmes, opening access to proficiency testing or publicising examples of best laboratory practice 	Replace countries with NPPOs because this section is addressed to Contracting parties and NPPOs.	Canada
30.	15	Editorial	<ul style="list-style-type: none"> share diagnostic protocols used by NPPOs on the IPPC phytosanitary resources pages 	There is only one page.	Uruguay, Brazil, Argentina
31.	15	Substantive	<ul style="list-style-type: none"> share diagnostic protocols used by NPPOs on the IPPC phytosanitary resources pages <u>via links to NPPOs resource pages.</u> 	SPHD recognises the advantages of sharing DPs through the IPPC but is concerned that this information may be considered as “endorsed” or “adopted IPPC protocols” by end users. Many RPPOs and NPPOs have DPs lodged on a publicly available website (i.e. the NPBDN website) and it may be strategic for the IPPC to promote these links on the IPPC webpage or global stocktake.	Australia
32.	16	Substantive	<ul style="list-style-type: none"> encourage <u>and support</u> experts to contribute to the IPPC standard setting processes for DPs 	Where gaps in international diagnostics are identified through a strategic approach, the IPPC, NPPO and RPPO programs should encourage and support attendance by experts from targeted member countries/regions.	Australia
33.	17	Substantive	<ul style="list-style-type: none"> consider strategic needs for expertise in taxonomy of pests and classical diagnostic skills, and either fund this within the country or, where necessary, pool resources with other 	Replace countries with NPPOs because NPPOs are the specific organizations within a country that should have the diagnostic capacity and capability	Canada

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			NPPOs countries to ensure sufficient diagnostic capacity and capability is in place to meet future demand.		
34.	17	Technical	<ul style="list-style-type: none"> consider strategic needs for expertise in taxonomy of pests and classical diagnostic skills, and either fund this within the country or, where necessary, pool resources with other countries to ensure sufficient diagnostic capacity and capability is in place to meet future demand. 	Resources are already mentioned in paragraph 13 and it's a matter of countries how they support their activities with other countries.	Uruguay, Brazil, Argentina
35.	19	Substantive	<ul style="list-style-type: none"> Develop diagnostic protocols <u>and other resources</u> relevant to their region and share them on the IPPC phytosanitary resources pages 	For some groups of pests, something less than a diagnostic protocol is adequate for phytosanitary operations (e.g. PaDIL image library)	Australia
36.	19	Technical	<ul style="list-style-type: none"> <u>Support the development of</u> Develop diagnostic protocols relevant to their region and share them on the IPPC phytosanitary resources pages 	More appropriate to RPPOs responsibilities.	Uruguay, Brazil, Argentina
37.	20	Substantive	<ul style="list-style-type: none"> Develop or endorse guidance on laboratory requirements for pest diagnosis <u>and benchmarking with international standards for overall management and technical aspects required for a diagnostic laboratory.</u> 	The initial phase could be guidance on laboratory requirements for pest diagnosis but in a long term, the approach should be to work towards an overall system for diagnostic laboratory and benchmarking.	Singapore
38.	20	Technical	<ul style="list-style-type: none"> Develop or endorse <u>Support the development of</u> guidance on laboratory requirements for pest diagnosis 	1. More appropriate to RPPOs responsibilities. 2. RPPOs are not an instance of validation.	Uruguay, Brazil, Argentina
39.	22	Substantive	<ul style="list-style-type: none"> Facilitate other means of enhancing expertise and capacity within the region, such as through <u>identifying regional experts</u>, staff exchanges, exchange of samples and proficiency testing, mentoring schemes and 	RPPOs should lead in identifying regional experts for member countries to tap on to enhance expertise and capacity within the region. It may take time to establish centres of expertise and hence identifying regional experts could be a step before the centres of	Singapore

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			work shadowing	expertise.	
40.	22	Substantive	<ul style="list-style-type: none"> Facilitate other means of enhancing expertise and capacity within the region, such as through staff exchanges, exchange of samples and proficiency testing, mentoring schemes and work shadowing 	This is a big burden for limited return better to encourage publications in peer reviewed journals – hence have the skills. Proficiency testing is likely to have very limited value unless there is an independent process set up – it is often very expensive to do this.	Australia
41.	22	Substantive	<ul style="list-style-type: none"> Facilitate work to other means of enhancing expertise and capacity within the region, such as through staff exchanges, exchange of samples and proficiency testing, mentoring schemes and work shadowing 	Paragraph was modified to better express the RPPO tasks, the examples were deleted because they could be beyond the functions of a RPPO.	Uruguay, Brazil, Argentina
42.	23	Substantive	<ul style="list-style-type: none"> Identify and encourage the development of centres of expertise that NPPOs contracting parties within the region can access. 	Replace contracting parties with NPPOs because it is the NPPOs that need centres of expertise	Canada
43.	24	Substantive	<p>The CPM encourages the IPPC Secretariat to:</p> <ul style="list-style-type: none"> <u>Maintain a stocktake of protocol development by NPPOs, RPPOs and the IPPC. Protocols are a via link to the owners resource page</u> <u>Identify gaps in diagnostic capability for a pest or group of pests; and</u> <u>Identify and supporting appropriate collaborators to develop a diagnostic protocol for adoption</u> 	A more strategic approach by the IPPC to global coordination of diagnostic protocol development would minimise duplication of resources that currently exists between the IPPC, RPPOs and NPPOs and identify key beneficiaries of the development process.	Australia
44.	25	Substantive	<ul style="list-style-type: none"> Secure <u>external</u> funding for capacity development on diagnostic support <u>pending outcome of review</u>. 	This change is added to note external funding would be required and that this would be pending the proposed review.	Australia

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45.	25	Substantive	<ul style="list-style-type: none"> Secure funding for capacity development on diagnostic support 	Suggest that paragraphs 25 should be deleted since it is a short-term strategic objective and not appropriate for a Recommendation. Instead this could be proposed as a CPM decision and recorded in the CPM report.	Canada
46.	26	Substantive	<ul style="list-style-type: none"> Liaise with RPPOs and research and educational organizations on pest diagnosis issues 	It should not be a recommendation for liaison between IPPC Secretariat and such organizations until the CPM decide its specific objectives.	Uruguay, Brazil, Argentina
47.	27	Editorial	<ul style="list-style-type: none"> Publicise national, regional and international developments in pest diagnosis and diagnostic protocols on the phytosanitary resources pages. 	There is only one page.	Uruguay, Brazil, Argentina