



2005-003: Draft Appendix to ISPM 20 – Arrangements for verification of compliance of consignments by the importing country in the exporting country

Comm no.	Para no.	Comment type	Comment	Explanation	Country
1.	G	Editorial	Add bullets at relevant points in the document (e.g. paragraphs 16-20, 35-38,55-72)	For clarity	EPPO, European Union, Austria, Norway
2.	G	Editorial	We would like to propose to add bullet list under section 2 para 16-20, section 3 para 23-28, section 4.2 para 35-39, section 4.4 para 44-51 and section 5 para 55-73.	The draft standard should be in line with the IPPC style guide for standard and meeting documents.	Thailand
3.	G	Substantive	I support the document as it is and I have no comments		Georgia, Lao People's Democratic Republic, Malaysia, Nepal, Congo, South Africa, Philippines, Ghana
4.	G	Substantive	It should be generally understood that this Annex deals with arrangements for verification of compliance as mentioned in section 5.1.5.2.1 of ISPM20, and that it is not about audits of procedures in the exporting country mentioned under section 5.1.5.1 of the same standard. Consequential changes to the text are proposed for the relevant paragraphs of the current draft Annex.	The text of this annex should be clearly based on the agreed concept of verification of compliance and the relevant part of ISPM20.	EPPO, European Union, Austria, Norway
5.	G	Substantive	The proposed re-structuring of Section 3, 4 & 5 are as follows: Proposed revised Section 3: (21) 3. Requirements for an Arrangement (22) The following requirements are applicable to all arrangements:	For better presentation & grouping of the information for clarity.	APPPC, Singapore, Thailand, Korea, Republic of, China

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			<p><u>(23) An arrangement for allowing verification procedures for consignment to be performed in the exporting country should be developed through consultation between the NPPO of the importing country and the NPPO of the exporting country, respecting the general principles of the IPPC regarding the responsibilities of both NPPOs.</u></p> <p><u>(24) When an arrangement is in place, minimal or no procedures should be carried out upon entry of the consignment in the importing country to verify compliance with phytosanitary import requirements.</u></p> <p><u>(25) The financial aspects of the arrangement should be agreed on by the NPPOs of the importing country and the exporting country.</u></p> <p><u>(26) The arrangement should specify the technical details as well as the conditions for scaling down inspection levels and suspending or terminating the arrangement.</u></p> <p><u>(27) The arrangement may have a limited time frame, in which case this should be specified. (28) The arrangement should be subject to regular review.</u></p> <p><u>(new 29) (formerly 75) An arrangement may be applied to all exported consignments of a particular commodity, or to only a percentage thereof. It may be limited to a certain time period during the shipping season.</u></p> <p><u>(new 30) (formerly 76) An arrangement should aim for the lowest possible intensity of activities to be carried out by the NPPO of the importing country.</u></p> <p><u>(new 31) (formerly 41) The NPPO proposing an arrangement – though it works collaboratively with the other NPPO – has primary responsibility for the</u></p>		

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			<p><u>development of both new and revised arrangements. As with new arrangements, revision of existing arrangements requires the agreement of the NPPOs of the importing country and the exporting country before implementation.</u></p> <p><u>(new 32) 4. Process for Establishing an Arrangement</u></p> <p><u>(new 33) The steps that may be followed to establish an arrangement are outlined below.</u></p> <p><u>(new 34) 4.1 Proposal</u></p> <p><u>(new 35) The NPPO of the importing country may propose an arrangement to the NPPO of the exporting country. The proposal should be assessed by the NPPO of the exporting country to determine whether the proposed arrangement would meet the requirements of this appendix. The initiative to establish an arrangement may also come from the NPPO of the exporting country. Regardless of the origin, the proposal may be in response to a need identified by the initiating NPPO or by industry representatives.</u></p> <p><u>(new 36) (formerly 33) 4.2 Evaluation Examination of the Proposal (Include paras from 4.4 i.e. 44 – 48 under Formalization; Rest under Formalization to be deleted -)</u></p> <p><u>(new 37) The NPPO receiving the proposal should examine the proposal in a timely manner.</u></p> <p><u>(new 38) Some elements of a proposal may need to be discussed before the full development &/ formalization of an arrangement. These may include:</u></p>		

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			<ul style="list-style-type: none">• <u>(formerly 44) The inspection & sampling of the consignment</u> • <u>(formerly 45) The testing procedures</u> • <u>(formerly 46) The verification of any treatment used</u> • <u>(formerly 47) The verification of the consignment identity</u> • <u>(formerly 48) The time & location of verification of compliance of the consignment</u> • <u>(formerly 49) notification to the point of entry of the arrival of the consignment</u> • <u>(formerly 50) assignment of qualified staff to implement provisions under the arrangement</u> • <u>(formerly 51) timing of the activities for the verification of compliance; for example, before or after issuance of the phytosanitary certificate by the NPPO of the exporting country.</u> <p><u>(new 47) 5. Components of an Arrangement (Group para 55 - 76 into Operational, Administration and Compliance components)</u></p> <p><u>(new 48) (53) The technical requirements for an arrangement should be determined and developed on a case-by-case basis and should be described in the administrative, operational and compliance details of the arrangement.</u></p> <p><u>(new 49) Administrative Requirements (55, 56, 57, 59,</u></p>		

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			<p>67 & 71)</p> <p>(new 50) (formerly 55) legal and regulatory authorities</p> <p>(new 51) (formerly 56) phytosanitary legislation or regulations</p> <p>(new 52) (formerly 57) participating organizations</p> <p>(new 53) (formerly 59) approved growers and exporters / Approval system for growers & exporters</p> <p>(new 54) (formerly 67) financial aspects</p> <p>(new 55) (formerly 71) frequency & timing of reviews of the arrangement</p> <p>(new 56) Operational Requirements (61, 62, 63, 64, 58, 60, 65 & 66)</p> <p>(new 57) (formerly 61) regulated articles</p> <p>(new 58) (formerly 62) regulated pests and the relevant phytosanitary measures for these pests required by the NPPO of the importing country</p> <p>(new 59) (formerly 63) phytosanitary actions (such as testing, verification of treatment and verification of consignment integrity)</p> <p>(new 60) (formerly 64) inspection, sampling and testing regimes or conformity inspection scheme of the NPPO of the importing country</p> <p>(new 61) (formerly 58) roles and responsibilities</p>		

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			<p><u>(including those of NPPOs, exporters and growers)</u></p> <p><u>(new 62) (formerly 60) duration of activities</u></p> <p><u>(new 63) (formerly 65) infrastructure and equipment</u></p> <p><u>(new 64) (formerly 66) documentation to be maintained and provided by the NPPO of the exporting country to the NPPO of the importing country</u></p> <p><u>(new 65) Compliance Requirements (68, 69 & 72)</u></p> <p><u>(new 66) (formerly 68) notification of quarantine pest detection or non-compliance (new 67) (formerly 69) corrective actions following non-compliance</u></p> <p><u>(new 68) (formerly 72) criteria that could result in suspension or termination of the arrangement</u></p> <p><u>Delete 70 & 73 – unnecessary</u></p> <p><u>(70- propose to delete) provisions to bilaterally consider the least costly and acceptable risk management measures to potentially salvage a rejected consignment (reason: voluntarily arrangement & hence should go for least</u></p> <p><u>(73- propose to delete) Any actions undertaken by the NPPO of the importing country in the exporting country under an arrangement are subjected to and must comply with the legislation of the exporting country.</u></p>		
6.	G	Substantive	<u>This standards should be a supplement to ISPM 20.</u>	This standard should be a supplement to ISPM 20. According to the IPPC procedural manual for standard setting, a supplement i	Australia

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				<p>s a prescriptive, official part of a standard to add conceptual information that is supplemental to a standard and that provides additional text without changing existing text. This standard provides critical requirements on the concept of offshore verification of compliance that will help members minimize negative trade effects whilst maintaining phytosanitary protection as mandated under article 5 of the SPS Agreement. In particular, this standard has three requirements:[7] NPPOs of the importing country and exporting country may establish and use a bilateral arrangement for verification procedures to be performed on consignments in the exporting country only on a voluntary and case-by-case basis and for a time period relevant for each situation.[8] Consignments should not be subjected to these verification procedures again at the point of entry. The NPPO of the importing country may perform other verification procedures such as document and identity checks at the point of entry.[13]An arrangement should not be established as a condition to allow trade.As an appendix, this standard will be for information only and there won't be an obligation for contracting parties to implement its requirements.</p>	
7.	G	Substantive	<p><u>It is suggested to move paras 15,16,18 and 19 to follow para 7 as they refer to what the App can achieve.</u></p> <p><u>The proposed re-structuring of Section 3, 4 & 5 are as follows:</u></p> <p><u>Proposed revised Section 3:</u></p> <p><u>(21) 3. Requirements for an Arrangement</u></p> <p><u>(22) The following requirements are applicable to all arrangements:</u></p> <p><u>(23) An arrangement for allowing verification procedures for consignment to be performed in the exporting country should be developed through consultation between the NPPO of the importing</u></p>	<p>For better presentation & grouping of the information for clarity.</p>	New Zealand

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			<p><u>country and the NPPO of the exporting country, respecting the general principles of the IPPC regarding the responsibilities of both NPPOs.</u></p> <p><u>(24) When an arrangement is in place, minimal or no procedures should be carried out upon entry of the consignment in the importing country to verify compliance with phytosanitary import requirements.</u></p> <p><u>(25) The financial aspects of the arrangement should be agreed on by the NPPOs of the importing country and the exporting country.</u></p> <p><u>(26) The arrangement should specify the technical details as well as the conditions for scaling down inspection levels and suspending or terminating the arrangement.</u></p> <p><u>(27) The arrangement may have a limited time frame, in which case this should be specified. (28) The arrangement should be subject to regular review.</u></p> <p><u>(new 29) (formerly 75) An arrangement may be applied to all exported consignments of a particular commodity, or to only a percentage thereof. It may be limited to a certain time period during the shipping season.</u></p> <p><u>(new 30) (formerly 76) An arrangement should aim for the lowest possible intensity of activities to be carried out by the NPPO of the importing country.</u></p> <p><u>(new 31) (formerly 41) The NPPO proposing an arrangement – though it works collaboratively with the other NPPO – has primary responsibility for the development of both new and revised arrangements. As with new arrangements, revision of existing arrangements requires the agreement of the NPPOs of the importing country and the exporting country before</u></p>		

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			<p><u>implementation.</u></p> <p><u>(new 32) 4. Process for Establishing an Arrangement</u></p> <p><u>(new 33) The steps that may be followed to establish an arrangement are outlined below.</u></p> <p><u>(new 34) 4.1 Proposal</u></p> <p><u>(new 35) The NPPO of the importing country may propose an arrangement to the NPPO of the exporting country. The proposal should be assessed by the NPPO of the exporting country to determine whether the proposed arrangement would meet the requirements of this appendix. The initiative to establish an arrangement may also come from the NPPO of the exporting country. Regardless of the origin, the proposal may be in response to a need identified by the initiating NPPO or by industry representatives.</u></p> <p><u>(new 36) (formerly 33) 4.2 Evaluation Examination of the Proposal (Include paras from 4.4 i.e. 44 – 48 under Formalization; Rest under Formalization to be deleted -)</u></p> <p><u>(new 37) The NPPO receiving the proposal should examine the proposal in a timely manner.</u></p> <p><u>(new 38) Some elements of a proposal may need to be discussed before the full development &/ formalization of an arrangement. These may include:</u></p> <ul style="list-style-type: none"> <u>• (formerly 44) The inspection & sampling of the consignment</u> 		

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			<ul style="list-style-type: none">• (formerly 45) The testing procedures • (formerly 46) The verification of any treatment used • (formerly 47) The verification of the consignment identity • (formerly 48) The time & location of verification of compliance of the consignment • (formerly 49) notification to the point of entry of the arrival of the consignment • (formerly 50) assignment of qualified staff to implement provisions under the arrangement • (formerly 51) timing of the activities for the verification of compliance; for example, before or after issuance of the phytosanitary certificate by the NPPO of the exporting country. <p>(new 47) 5. Components of an Arrangement (Group para 55 - 76 into Operational, Administration and Compliance components)</p> <p>(new 48) (53) The technical requirements for an arrangement should be determined and developed on a case-by-case basis and should be described in the administrative, operational and compliance details of the arrangement.</p> <p>(new 49) Administrative Requirements (55, 56, 57, 59, 67 & 71)</p>		

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			<p>(new 50) (formerly 55) legal and regulatory authorities</p> <p>(new 51) (formerly 56) phytosanitary legislation or regulations</p> <p>(new 52) (formerly 57) participating organizations</p> <p>(new 53) (formerly 59) approved growers and exporters / Approval system for growers & exporters</p> <p>(new 54) (formerly 67) financial aspects</p> <p>(new 55) (formerly 71) frequency & timing of reviews of the arrangement</p> <p>(new 56) Operational Requirements (61, 62, 63, 64, 58, 60, 65 & 66)</p> <p>(new 57) (formerly 61) regulated articles</p> <p>(new 58) (formerly 62) regulated pests and the relevant phytosanitary measures for these pests required by the NPPO of the importing country</p> <p>(new 59) (formerly 63) phytosanitary actions (such as testing, verification of treatment and verification of consignment integrity)</p> <p>(new 60) (formerly 64) inspection, sampling and testing regimes or conformity inspection scheme of the NPPO of the importing country</p> <p>(new 61) (formerly 58) roles and responsibilities (including those of NPPOs, exporters and growers)</p>		

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			<p><u>(new 62) (formerly 60) duration of activities</u></p> <p><u>(new 63) (formerly 65) infrastructure and equipment</u></p> <p><u>(new 64) (formerly 66) documentation to be maintained and provided by the NPPO of the exporting country to the NPPO of the importing country</u></p> <p><u>(new 65) Compliance Requirements (68, 69 & 72)</u></p> <p><u>(new 66) (formerly 68) notification of quarantine pest detection or non-compliance (new 67) (formerly 69) corrective actions following non-compliance</u></p> <p><u>(new 68) (formerly 72) criteria that could result in suspension or termination of the arrangement</u></p> <p><u>Delete 70 & 73 – unnecessary</u></p> <p><u>(70- propose to delete) provisions to bilaterally consider the least costly and acceptable risk management measures to potentially salvage a rejected consignment (reason: voluntarily arrangement & hence should go for least</u></p> <p><u>(73- propose to delete) Any actions undertaken by the NPPO of the importing country in the exporting country under an arrangement are subjected to and must comply with the legislation of the exporting country.</u></p>		
8.	G	Substantive	<p><u>The draft is good and relevant to the Caribbean. It is also well timed</u></p> <p><u>The standard needs to have a section dealing with eme</u></p>	The draft is good and relevant to the Caribbean. It is also well timed The standard needs to have a section dealing with emergency situations that might arise	Barbados, Jamaica, Belize, Guyana

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			<u>rgency situations that might arise</u>		
9.	G	Substantive	<ol style="list-style-type: none"> <u>This draft appendix should be referred to in the existing ISPM20 for clarity and referencing since there is no reference to the draft appendix in the existing ISPM20..</u> <u>It should be clarified the difference of definition between "verification of compliance of consignments", "audit", and "pre-clearance".</u> 	1. It is not clear that which section of ISPM20 is referred to this draft appendix. 2. The difference of definition between "verification of compliance of consignments", "audit" and "pre-clearance" should be clarified to avoid confusing for member countries. In particular, it is not clear the "verification of compliance of consignments" covers "audit" specified in 5.1.5.1 of ISPM20.	Japan
10.	G	Substantive	<u>Se considera una norma de importancia para los países y se solicita al Coordinador de la Norma se de a la tarea de proponer un término que sustituya a "preclearance", así mismo se solicita se redefina el término que sustituya a "preclearance". Se sugiere para una mejor identificación de los productos sujetos a este procedimiento de verificación que se identifiquen de alguna manera.</u>	Clarificar la norma	Costa Rica
11.	G	Technical	<u>The draft appendix should be referred to in the existing ISPM 20 for clarity and referencing. Currently, there is no reference of a appendix in the existing ISPM 20.</u>	To mention the appendix in the main text of ISPM 20 for clarity.	APPPC, Singapore, Thailand, Korea, Republic of, China
12.	G	Translation		As the English version refers to "an arrangement" along the draft, the Spanish version should also refer to "un acuerdo" for consistency.	COSAVE, Mexico, Argentina, Peru, Brazil, Chile, Uruguay, Paraguay, Costa Rica
13.	1	Substantive	DRAFT ANNEX APPENDIX to ISPM 20 – ARRANGEMENTS FOR VERIFICATION OF COMPLIANCE OF CONSIGNMENTS BY THE IMPORTING COUNTRY IN THE EXPORTING COUNTRY (2005-003)	From the content it is clear that this should be annex and not an appendix. This annex provides guidance and requirements for NPPOs that want to establish an arrangement for this type of verification of compliance.	EPPO, European Union, Austria, Norway
14.	1	Substantive	DRAFT APPENDIX to ISPM 20 – ARRANGEMENTS FOR CLEARANCE VERIFICATION OF COMPLIANCE OF CONSIGNMENTS BY THE IMPORTING COUNTRY IN THE EXPORTING COUNTRY (2005-003)	Clearance of a consignment is a glossary term defined as "verification of compliance with phytosanitary regulations" therefore the defined term should be used. Moreover the aim of an arrangement for the presence of the importing country in the exporting country is the clearance of consignments and this	Mexico, Peru, Costa Rica

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				should be explicit in the text. This change should be applied along the draft for consistency.	
15.	1	Substantive	DRAFT APPENDIX to ISPM 20 – ARRANGEMENTS FOR CLEARANCE VERIFICATION OF COMPLIANCE OF CONSIGNMENTS BY THE IMPORTING COUNTRY IN THE EXPORTING COUNTRY (2005-003)	Clearance of a consignment is a glossary term defined as "verification of compliance with phytosanitary regulations". Therefore the defined term should be used. Moreover, the aim of an arrangement for the presence of the importing country in the exporting country is the clearance of consignments and this should be explicit in the text.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
16.	3	Substantive	This appendix was adopted by the [XX]th Session of the Commission on Phytosanitary Measures in [month] [year].	See comment to paragraph 1	EPPO, European Union, Austria
17.	4	Substantive	This annex is for reference purposes only and is not a prescriptive part of the standard.	See comment to paragraph 1	EPPO, European Union, Austria, Norway
18.	5	Substantive	APPENDIX ANNEX 1: Arrangements for verification of compliance of consignments by the importing country in the exporting country	See comment to [1]	European Union, Austria
19.	5	Substantive	APPENDIX 1: Arrangements for verification of compliance of consignments by the importing country in the exporting country	We suggest simplifying the title and using one term ("agreement" or "arrangement") throughout the document for better understanding of the procedure and for consistency throughout the document. If "agreement" is the term to be used in the document, we suggest defining the term "bilateral agreement" in the IPPC glossary (for example, see NAPPO RSPM 19)	United States of America
20.	5	Substantive	APPENDIX 1: Arrangements for clearance verification of compliance of consignments by the importing country in the exporting country	Clearance of a consignment is a glossary term defined as "verification of compliance with phytosanitary regulations". Therefore the defined term should be used. Moreover, the aim of an arrangement for the presence of the importing country in the exporting country is the clearance of consignments and this should be explicit in the text.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
21.	5	Technical	APPENDIX ANNEX 1: Arrangements for verification of compliance of consignments by the importing country in the exporting country	See comment to [1]	EPPO, Austria, Norway
22.	6	Editorial	The national plant protection organization (NPPO) of the importing country usually verifies compliance of consignments with phytosanitary import requirements on entry <u>in</u> to the importing country. However, <u>in some cases</u> , to facilitate trade logistics, and release a consignment at destination, contracting parties may in	Better English, improvement of readability and clarity.	EPPO, European Union, Austria

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			some cases bilaterally negotiate an arrangement that allows some verification procedures to be performed by the NPPO of the importing country in the exporting country.		
23.	6	Editorial	The national plant protection organization (NPPO) of the importing country usually verifies compliance of consignments with phytosanitary import requirements on entry to the importing country. However, to facilitate trade logistics and the release of a consignment at destination, contracting parties may in some cases bilaterally negotiate an arrangement that allows some verification procedures to be performed by the NPPO of the importing country in the exporting country.	More appropriate wording	United States of America
24.	6	Substantive	The national plant protection organization (NPPO) of the importing country usually verifies compliance of consignments with phytosanitary import requirements on entry to the importing country. However, to facilitate trade logistics and release a consignment at destination , contracting parties may in some cases bilaterally negotiate an arrangement that allows some verification procedures to be performed by the NPPO of the importing country in the exporting country. <u>Such arrangements are covered in section 5.1.5.2.1 of this Standard and are distinct from audits of procedures in exporting countries referred to in this Standard under section 5.1.5.1.</u>	The words "and release a consignment at destination" are deleted as they would depart from pre-clearance based on purely logistical reasons. The last sentence is added to avoid overlap and confusion with systems audits, that are something quite different. As announced in the General comments (second comment), this is a consequential change that will be repeated in several places. A reference to this annex would be needed in the main text of the Standard (ISPM20), for instance in paragraph 5.1.5.2.	EPPO
25.	6	Substantive	The national plant protection organization (NPPO) of the importing country usually verifies compliance of consignments with phytosanitary import requirements on entry to the importing country. However, to facilitate trade logistics and release a consignment at destination, contracting parties may in some cases bilaterally negotiate an arrangement that allows some verification procedures to be performed by the NPPO of the importing country in the exporting country. <u>Such arrangements are covered in section 5.1.5.2.1 of this Standard and are distinct from audits of procedures in exporting countries referred to in this Standard under section 5.1.5.1.</u>	The last sentence is added to avoid overlap and confusion with systems audits, that are something quite different. As announced in the General comments (second comment), this is a consequential change that will be repeated in several places. A reference to this annex would be needed in the main text of the Standard (ISPM20), for instance in paragraph 5.1.5.2.	European Union, Austria

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26.	6	Substantive	The national plant protection organization (NPPO) of the importing country usually verifies compliance of consignments with phytosanitary import requirements on entry to the importing country. However, <u>to prevent the introduction of regulated pests as well as</u> to facilitate trade logistics and release a consignment at destination, contracting parties may in some cases bilaterally negotiate an arrangement that allows some verification procedures to be performed by the NPPO of the importing country in the exporting country.	To be align with the objective of ISPM 20.	APPPC, Singapore, Thailand, Korea, Republic of, China
27.	6	Substantive	The national plant protection organization (NPPO) of the importing country usually verifies compliance of consignments with phytosanitary import requirements on entry to the importing country. However, to facilitate trade logistics and release a consignment at destination, contracting parties may in some cases bilaterally <u>or multilaterally</u> negotiate an arrangement that allows some verification procedures to be performed by the NPPO of the importing country in the exporting country.	These arrangements may on occasion be multilateral, such as instances of commodities in transit.	Australia
28.	6	Substantive	The national plant protection organization (NPPO) of the importing country usually verifies compliance of consignments with phytosanitary import requirements on entry to the importing country. However, to facilitate trade logistics and release a consignment at destination, contracting parties may in some cases bilaterally negotiate an arrangement that allows some verification procedures to be performed by the NPPO of the importing country in the exporting country.	The aim of this type of arrangement is the clearance of the consignments in the exporting country by the importing country.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
29.	6	Substantive	The national plant protection organization (NPPO) of the importing country usually verifies compliance of consignments with phytosanitary import requirements on entry to the importing country. However, <u>to prevent the introduction of regulated pests as well as</u> to facilitate trade logistics and release a consignment at destination, contracting parties may in some cases bilaterally negotiate an arrangement that allows some verification procedures to be performed by the NPPO of the importing country in the exporting country.	"Verification of compliance of consignments" is used not only for facilitation of trade logistics but for prevention of the introduction of regulated pests that is laid down in the objective of ISPM20.	Japan

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30.	6	Substantive	La organización nacional de protección fitosanitaria (ONPF) del país importador generalmente verifica que los envíos cumplan con los requisitos fitosanitarios de importación en el momento de su entrada al país importador. Sin embargo, para facilitar la logística del comercio y liberar un envío en su destino , las partes contratantes podrán, en algunos casos, negociar de forma bilateral un acuerdo que permita que la ONPF del país importador realice algunos procedimientos de verificación en el país exportador.	"Liberar" no es un término adecuado porque puede ser mal interpretado.	Costa Rica
31.	6	Technical	The national plant protection organization (NPPO) of the importing country usually verifies compliance of consignments with phytosanitary import requirements on entry to the importing country. However, to facilitate trade logistics and release a consignment at destination , contracting parties may in some cases bilaterally negotiate an arrangement that allows some verification procedures to be performed by the NPPO of the importing country in the exporting country.	The deletion is suggested to avoid confusion. It is the trade logistics which is a key issue in this draft Annex.	European Union, Austria
32.	7	Editorial	NPPOs of the importing country and the exporting country may establish and use a bilateral arrangement (hereinafter referred to as an “arrangement”) for verification procedures to be performed on consignments in the exporting country only on a voluntary and case-by-case basis and for an <u>agreed</u> time period relevant to each situation.	Clearer English	EPPO, European Union, Austria, Norway
33.	7	Editorial	NPPOs of the importing country and the exporting country may establish and use a bilateral arrangement (hereinafter referred to as an “arrangement”) for verification procedures to be performed on consignments in the exporting country only on a voluntary and case-by-case basis and for a time period <u>agreed by both parties</u> relevant to each situation .	For clarity.	Singapore
34.	7	Substantive	NPPOs of the importing country and the exporting country may establish and use a bilateral arrangement (hereinafter referred to as an “arrangement”) for verification procedures to be performed on consignments <u>of specified commodities</u> in the exporting country only on a voluntary and case-by-case basis and	To clarify that no generic arrangements can be made, and that they can only apply to specific commodities.	EPPO, European Union, Austria, Norway

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			for a time period relevant to each situation.		
35.	7	Substantive	NPPOs of the importing country and the exporting country may establish and use a bilateral arrangement (hereinafter referred to as an “arrangement”) for verification procedures to be performed on consignments in the exporting country only on a voluntary and case-by-case basis and for a time period relevant to each situation. <u>agreed by both parties.</u>	Agreement of both parties is required for this voluntary arrangement.	APPPC, Korea, Republic of, China
36.	7	Substantive	NPPOs of the importing country and the exporting country should only <u>may</u> establish and use a bilateral <u>or multilateral</u> arrangement (hereinafter referred to as an “arrangement”) for verification procedures to be performed on consignments in the exporting country only on a voluntary and case-by-case basis and for a time period <u>agreed by both parties</u> relevant to each situation.	The use of 'should only' instead of 'may' makes it clear that these arrangements should be voluntary. In some cases these arrangements may also be between more than one country (multilateral) like transit arrangements. A time period should be agreed by both parties	Australia
37.	7	Technical	Las ONPF del país importador y del país exportador podrán establecer un acuerdo bilateral (en lo sucesivo, un “acuerdo”) y utilizarlo a efectos de la realización de procedimientos de verificación de los envíos en el país exportador, únicamente con carácter voluntario, en casos individuales y por un período <u>justificado técnicamente</u> pertinente en cada situación.	Para determinar en forma apropiada el período	Costa Rica
38.	7	Translation	Las ONPF del país importador y del país exportador podrán establecer un acuerdo bilateral (en lo sucesivo, un “acuerdo”) y utilizarlo a efectos de la realización de procedimientos de verificación de los envíos en el país exportador, únicamente con carácter voluntario, en <u>atendidos caso por caso</u> casos individuales y por un período pertinente en cada situación.	Términos más apropiados	Costa Rica
39.	8	Editorial	The arrangement should <u>may</u> only include procedures to verify compliance of consignments in line with <u>this standard ISPM 20 (Guidelines for a phytosanitary import regulatory system)</u> . Consignments should not be subjected to the same <u>se</u> -verification procedures again at the point of entry. The NPPO of the importing country may, however, perform other verification procedures, such as document and identity checks, at the point of entry.	1 changing may to should: the meaning is not different in this case, but the word "should" will be better understood. 2 this is already an annex to ispm 20 3 "same" added for clarity.	EPPO, European Union, Austria

Comm no.	Para no.	Comment type	Comment	Explanation	Country
40.	8	Editorial	The arrangement may only include procedures to verify compliance of consignments in line with ISPM 20 (<i>Guidelines for a phytosanitary import regulatory system</i>). Consignments should not be subjected to these verification procedures again at the point of entry. However, the NPPO of the importing country may, however, perform other verification procedures, such as document and identity checks, at the point of entry.	Grammatical.	Australia
41.	8	Substantive	The arrangement may only include procedures to verify compliance of consignments <u>with established and published phytosanitary import requirements for the relevant commodities</u> in line with ISPM 20 (<i>Guidelines for a phytosanitary import regulatory system</i>). <u>The phytosanitary import requirements may be referred to in the arrangement.</u> Consignments <u>verified under this arrangement</u> should not be subjected to these verification procedures again at the point of entry. The NPPO of the importing country may, however, perform other verification procedures, such as document and identity checks, at the point of entry.	To clarify the meaning explained in paragraph 9 that these agreements should be based on previously published phytosanitary requirements. Paragraph 9 can be replaced by this sentence in paragraph 8. verified under these arrangements : this is to clarify that consignments may also be imported outside of these arrangement procedures, under the procedures described in the main text of ISPM 20.	EPPO
42.	8	Substantive	The arrangement may only include procedures to verify compliance of consignments <u>with established and published phytosanitary import requirements for the relevant commodities</u> in line with ISPM 20 (<i>Guidelines for a phytosanitary import regulatory system</i>). <u>The phytosanitary import requirements may be referred to in the arrangement.</u> Consignments <u>verified under this arrangement</u> should not be subjected to these verification procedures again at the point of entry. The NPPO of the importing country may, however, perform other verification procedures, such as document and identity checks, at the point of entry.	To clarify the meaning explained in paragraph 9 that these agreements should be based on previously established and published phytosanitary requirements. Paragraph 9 can be replaced by this sentence in paragraph 8. verified under these arrangements : this is to clarify that consignments may also be imported outside of these arrangement procedures, under the procedures described in the main text of ISPM 20.	European Union, Austria
43.	8	Substantive	The arrangement may only include procedures to verify compliance of consignments in line with ISPM 20 (<i>Guidelines for a phytosanitary import regulatory system</i>) <u>& ISPM 23 (Guideline for Inspections...)</u> . Consignments should not be subjected to these	To include the additional ISPM 23 that is applicable to this appendix and also to be clearer that verification should be based on justifications even though this a bilateral arrangement.	Singapore, APPPC, Korea, Republic of, China

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			verification procedures again unless there are justifications at the point of entry. The NPPO of the importing country may, however, perform other verification procedures, such as document and identity checks, at the point of entry.		
44.	8	Substantive	The arrangement may only include procedures to verify compliance of consignments in line with ISPM 20 (<i>Guidelines for a phytosanitary import regulatory system</i>) and ISPM 23 (Guidelines for inspection) . Consignments should not usually be subjected to these verification procedures again at the point of entry. The NPPO of the importing country may, however, perform other verification procedures, such as document and identity checks, at the point of entry.	ISPM 23 (Guidelines for inspection) provides guidance on the determination of phytosanitary compliance and would also be relevant. There may be instances where it is necessary to conduct these verification procedures again at the point of entry, such as evidence to suggest that secure packaging of the consignment has been compromised and contamination may have occurred after inspection. Additional guidance providing reasons additional checks may occur on arrival are suggested in paragraph [24].	Australia
45.	8	Substantive	The arrangement may only include procedures to verify compliance of consignments in line with ISPM 20 (<i>Guidelines for a phytosanitary import regulatory system</i>) & ISPM 23 (Guideline for Inspections) . Consignments should not be subjected to these verification procedures again unless there are justifications at the point of entry. The NPPO of the importing country may, however, perform other verification procedures, such as document and identity checks, at the point of entry.	To include the additional ISPM 23 that is applicable to this appendix and also to be clearer that verification should be based on justifications even though this a bilateral arrangement.	Thailand
46.	8	Substantive	The arrangement may only include procedures to verify compliance of consignments in line with ISPM 20 (<i>Guidelines for a phytosanitary import regulatory system</i>). Consignments may should not be subjected to these verification procedures again at the point of entry. The NPPO of the importing country may, however, perform other verification procedures, such as inspection , document and identity checks, at the point of entry.	Gives the importing country the option to do some verification at the port of entry	Barbados, Jamaica, Belize, Guyana
47.	8	Substantive	The arrangement may only include procedures to verify compliance of consignments in line with ISPM 20 (<i>Guidelines for a phytosanitary import regulatory system</i>). Consignments should not be subjected to these verification procedures again at the point of entry. The NPPO of the importing country may, however,	the quarantine technical inspection upon the arrival of the consignment to the importing country is a sovereign right because that different considerations such as the nature of product, the transport duration from the country of export, transport condition , certain laboratory tests are not available in the country of export etc	Bahrain

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			perform other verification procedures, such as document and identity checks, at the point of entry.		
48.	8	Substantive	The arrangement may only include procedures to verify compliance for clearance of consignments in line with ISPM 20 (<i>Guidelines for a phytosanitary import regulatory system</i>). Consignments should not be subjected to these verification procedures again at the point of entry. The NPPO of the importing country may, however, perform <u>a minimum of other verification</u> procedures, such as document and identity checks, at the point of entry.	1. It should be stated that verification procedures are intend for clearance consignments. Otherwise it is unclear the reasons why "verification procedures" can be implemented. 2. To be consistent with section 5.1.5.1 of ISPM 20.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
49.	8	Technical	The arrangement may only include procedures to verify compliance for clearance of consignments in line with ISPM 20 (<i>Guidelines for a phytosanitary import regulatory system</i>). Consignments should not be subjected to these verification procedures again at the point of entry. The NPPO of the importing country may, however, perform <u>a minimum of other</u> verification procedures, such as document and identity checks, at the point of entry.	1. It should stated that verification procedures are intended for clearance consignments. Otherwise it is unclear the reasons why "verification procedures" can be implemented. 2. To be consistent with section 5.1.5.1 of ISPM 20.	Mexico, Peru
50.	9	Substantive	The terms of the arrangement for a particular regulated article should be developed once the pest risk analysis (PRA) is completed, the pest risk is assessed and pest risk management options are selected. The pest risk management options selected in the PRA may be described in the arrangement.	paragraph deleted because it is a repetition of the ideas expressed in paragraph 8 and the reference to PRA is not appropriate here.	EPPO, European Union, Austria, Norway
51.	9	Substantive	The terms of the arrangement for a particular regulated article <u>or groups of regulated articles with similar requirements</u> should be developed once the pest risk analysis (PRA) is completed, the pest risk is assessed and pest risk management options are selected. The pest risk management options selected in the PRA may be described in the arrangement.	To be more inclusive as the arrangement may be applied to groups of regulated articles with similar PS requirements.	APPPC, Korea, Republic of, China
52.	9	Substantive	The terms of the arrangement for a particular regulated article <u>or categories of regulated articles</u> should be developed once the pest risk analysis (PRA) is completed, the pest risk is assessed and pest risk	Arrangement can be developed for a particular regulated article or categories of regulated articles that have the same phytosanitary import requirements.	Singapore

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			management options are selected. The pest risk management options selected in the PRA may be described in the arrangement.		
53.	9	Substantive	The terms of the arrangement for a particular regulated article or groups of regulated articles with similar requirements should be developed once the pest risk analysis (PRA) is completed, the pest risk is assessed and pest risk management options are selected. The pest risks and the pest risk management options selected in the PRA may be described in the arrangement.	It could also be useful for the arrangement to describe pest risks identified in the PRA in the arrangement as this is likely to influence inspection requirements.	Australia
54.	9	Substantive	The terms of the arrangement for a particular regulated article should be developed once the pest risk analysis (PRA) is completed, the pest risk is assessed and pest risk management options are selected. The pest risk management options selected in the PRA may be described in the arrangement.	This paragraph is not clear and creates confusion. Information provided is common sense and the paragraph could be removed.	NEPPO
55.	9	Technical	The terms of the arrangement for a particular regulated article should be developed once the pest risk analysis (PRA) is completed, i.e. , the pest risk is assessed and pest risk management options are selected. The pest risk management options selected in the PRA may be described in the arrangement.	To clarify because pest risk assessment and selection of pest risk management options are part of PRA.	Mexico, Peru
56.	9	Technical	The terms of the arrangement for a particular regulated article should be developed once the pest risk analysis (PRA) is completed, i.e. the pest risk is assessed and pest risk management options are selected. The pest risk management options selected in the PRA may be described in the arrangement.	To clarify because pest risk assessment and selection of pest risk management options are part of PRA.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
57.	10	Editorial	Independientemente de los acuerdos que puedan establecer las ONPF del país importador y del país exportador, la expedición de los certificados fitosanitarios sigue siendo responsabilidad exclusiva de la ONPF del país exportador. Además deberían tenerse en cuenta Los principios básicos establecidos en los artículos I.2, IV.2 a), IV.2 b), IV.2 c), IV.2 d), IV.2 e), IV.2 g) y V.1 de la CIPF asignan esta responsabilidad a la ONPF del país exportador.	Texto repetido, ya se mencionó en la primera oración de este párrafo, se incluye complemento para mejorar la redacción	Costa Rica

Comm no.	Para no.	Comment type	Comment	Explanation	Country
58.	10	Substantive	Irrespective of any arrangements between the NPPOs of the importing country and the exporting country, issuance of phytosanitary certificates remains the exclusive responsibility of the NPPO of the exporting country. The core principles stated in Articles I.2, IV.2(a), IV.2(b), IV.2(c), IV.2(d), IV.2(e), IV.2(g) and V.1 of the IPPC assign this responsibility to the NPPO of the exporting country. <u>Any actions undertaken by the NPPO of the importing country in the exporting country under an arrangement are subject to and must comply with the legislation of the exporting country.</u>	Moving this sentence from paragraph 73 to 10. This is an important message and should there be put more prominent earlier in the text.	EPPO, European Union, Austria, Norway
59.	11	Translation	The following guidance provides options to be considered by NPPOs in relation to arrangements for the verification of compliance of consignments by the NPPO of the importing country in the exporting country.	"guidance" should be translated into Spanish as "directriz"	COSAVE, Mexico, Argentina, Peru, Brazil, Chile, Uruguay, Paraguay
60.	11	Translation	En la siguiente directriz orientación se ofrecen opciones para que sean consideradas por las ONPF en relación con los acuerdos para la verificación del cumplimiento de los envíos por la ONPF del país importador en el país exportador.	Mejor término en español	Costa Rica
61.	13	Editorial	An arrangement may be proposed initiated by the NPPO of the exporting country or it may be proposed by the NPPO of the importing country. In all cases, the arrangement should be agreed on by both NPPOs. An arrangement should not be established as a condition to allow trade.	The arrangement would be proposed before it was initiated.	Australia
62.	13	Editorial	An arrangement may be proposed initiated by the NPPO of the exporting country or it may be proposed by the NPPO of the importing country. In all cases, the arrangement should be agreed on by both NPPOs. An arrangement should not be established as a condition to allow trade.	To simplify the text	United States of America
63.	13	Substantive	An arrangement may be initiated by the NPPO of the exporting country or it may be proposed by the NPPO of the importing country <u>specifying the proposed scope and reasons for</u>	Suggestions of addition to the first sentence is meant to clarify and strengthen the paragraph. The proposal for an arrangement should provide a justification to the proposal, to help ensure that proposals are logistically justified.	EPPO, Austria, Norway

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			the arrangement. In all cases, the arrangement should be agreed on by both NPPOs. An arrangement should not be established as a condition to allow trade.		
64.	13	Substantive	An arrangement may be initiated by the NPPO of the exporting country or it may be proposed by the NPPO of the importing country. <u>in both cases specifying the proposed scope and reasons for the arrangement.</u> In all cases, the arrangement should be agreed on by both NPPOs. An arrangement should not be established as a condition to allow trade.	Suggestions of addition to the first sentence is meant to clarify and strengthen the paragraph. The proposal for an arrangement should provide a justification to the proposal, to help ensure that proposals are logistically justified.	European Union
65.	13	Substantive	An arrangement may be initiated by the NPPO of the exporting country or it may be proposed by the NPPO of the importing country. In all cases, the arrangement should be agreed on by both NPPOs. An arrangement should not be established as a condition to allow trade. <u>(to retain the last sentence)</u>	The last sentence is to highlight that the bilateral arrangement should not only be for trade facilitation as there should still be technical justification for an arrangement to safeguard the plant health in trade.	APPPC, China
66.	13	Substantive	An arrangement may be initiated by the NPPO of the exporting country or it may be proposed by the NPPO of the importing country. In all cases, the arrangement should be agreed on by both NPPOs. An arrangement should not be established as a condition to allow trade.	The last sentence in this paragraph should be deleted due to ambiguity. In our understanding, If this sentence is necessary, its mean the arrangement should not be trade barrier. In the other hand, this sentence is unnecessary because once the PRA has completed and the pest risk management are selected. It means that the trade is allowed	Thailand
67.	13	Substantive	An arrangement may be initiated by the NPPO of the exporting country or it may be proposed by the NPPO of the importing country. In all cases, the arrangement should be agreed on by both NPPOs. An arrangement should not be established as a condition to allow trade.	A standard should not dictate what NPPOs may agree upon to allow trade. If preclearance is the only way a product may be imported, it should be considered a voluntary bilateral agreement for the safety and convenience of both parties.	United States of America
68.	13	Substantive	An arrangement may be initiated by the NPPO of the exporting country or it may be proposed by the NPPO of the importing country. In all cases, the arrangement should be agreed on by both NPPOs. An arrangement should not be established as a condition to allow trade.	A trade may be initiated as a result of bilateral agreement that allows verification procedures to be performed by the NPPO of the importing country in the exporting country in order to ensure that the phytosanitary measures are properly implemented and the import requirements are fully met by the exporting country.	Japan
69.	13	Translation	An arrangement may be initiated by the NPPO of the exporting country or it may be proposed by the NPPO of the importing country. In all cases, the arrangement should be agreed on by both NPPOs. An arrangement should not be established as a condition to allow trade.	In Spanish, first sentence should begin: "Un acuerdo podrá iniciarse por..."	COSAVE, Mexico, Argentina, Peru, Brazil, Chile, Uruguay, Paraguay

Comm no.	Para no.	Comment type	Comment	Explanation	Country
70.	13	Translation	Un acuerdo P podrá iniciarse por un acuerdo la ONPF del país exportador o bien podrá proponerlo la ONPF del país importador. El acuerdo debería, en todos los casos, ser consensuado por ambas ONPF. No debería establecerse un acuerdo como condición para permitir el comercio.	Para mejor redacción	Costa Rica
71.	14	Substantive	2. Criteria for Establishing an Arrangement	It is suggested that 14 and 17 be deleted and 15, 16 and 18 and 19 be moved to follow para 7 - as these paras refer to what can be achieved by this app.	New Zealand
72.	15	Editorial	Delete The establishment of an arrangement may be an option to deal with situations such as the following typical ones:	Unnecessary wording	EPPO, European Union, Austria, Norway
73.	15	Editorial	The establishment of an arrangement may be an option to deal with situations such as the following typical ones:	"such as" & " the following typical ones" are duplication phrases with the same meaning that should not be used together & hence to remove the last bit of the sentence.	APPPC, Thailand, Korea, Republic of, China
74.	15	Editorial	The establishment of an arrangement may be an option to deal with situations such as the following typical ones:	For clarity.	Singapore
75.	15	Editorial	The establishment of an arrangement may be an option to facilitate trade in deal with situations such as the following typical ones:	Clarification and simplifying sentence.	Australia
76.	15	Editorial	The establishment of an arrangement may be an option to deal with address the following situations such as the following typical ones:	for clarity	United States of America
77.	15	Editorial	The establishment of an arrangement may be an option to deal with situations such as the following typical ones:	To avoid redundancy	Brazil, COSAVE, Mexico, Argentina, Peru, Chile, Uruguay, Paraguay
78.	16	Substantive	to facilitate trade logistics <u>(e.g. relocating the consignment from the point of entry by accomodating physical capacity limitations at the point of entry; to accept, store, inspect and release consignments, inparticular perishable consignments)</u>	For paragraphs 16-20, these are detailed examples of situations where the arrangement could be applied. To provide examples	United States of America
79.	16	Substantive	para facilitar la logística del comercio; <u>cuando la evaluación del riesgo de plagas lo</u>	Las medidas fitosanitarias deben estar justificadas técnicamente.	Costa Rica

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			<u>justifique</u>		
80.	17	Substantive	to avoid hindering trade of a commodity after numerous instances of detection of regulated pests	The message of this sentence contradicts paragraph 13, last line, reading : 'An arrangement should not be established as a condition to allow trade'. The message also contradicts the very purpose set out on paragraph 6 ('facilitate trade logistics'). The message smacks of some kind of supervision of the exporting country's certification procedures, - a concept that should be kept separate from these arrangements. Those kind of 'trust-building' exercises (e.g. following repeated non-compliance) should be carried out as systems audits, cf. other sections of ISPM 20. The SC in May 2014 agreed on the concept that in some cases, for facilitating trade logistics, contracting parties may bilaterally negotiate arrangements.	EPPO, European Union, Austria, Norway
81.	17	Substantive	to avoid hindering trade of a commodity after numerous instances of detection of regulated pests <u>to avoid hindering trade of a commodity after numerous instances of detection of regulated pests (to delete this sentence)</u>	This sentence is redundant. With numerous instances of detection of regulated pests, there would be some issue with the arrangement that require reviewing instead of continuing to allow an arrangement and hence no need to have this sentence.	APPPC, New Zealand, Korea, Republic of, China
82.	17	Substantive	to avoid hindering trade of a commodity after numerous instances of detection of regulated pests	This sentence is redundant as with numerous instance of detection or interception of regulated pests, the entire system would be questionable.	Singapore
83.	17	Substantive	to avoid hindering trade of a commodity after numerous instances of detection of regulated pests	This is not a trade facilitation measure. If there is a repeated issue of non compliance due to detection of regulated pests, there is a need to audit the import pathway or conduct a PRA.	Australia
84.	17	Substantive	to avoid hindering trade of a commodity after numerous instances of detection of regulated pests <u>and lack of capacity to conduct reconditioning or treatment at the point of entry</u>	Things should be addressed at the place of origin	United States of America
85.	17	Substantive	to avoid hindering trade of a commodity after numerous instances of detection of regulated pests <u>(Add the following sentence)</u> <u>to ensure that the phytosanitary measures are properly implemented and the import requirements are fully met by the exporting country.</u>	It is appropriate to verify compliance of consignment by the importing country in the exporting country to ensure that the phytosanitary measures are properly implemented and the import requirements are fully met by the exporting country in case the procedures at the point of entry would not be sufficient to verify compliance with phytosanitary import requirement.	Japan

Comm no.	Para no.	Comment type	Comment	Explanation	Country
86.	18	Editorial	when measures associated with the refusal of a consignment at the point of entry (e.g. destruction, re-export, return to origin) are <u>too</u> costly or difficult to apply	Clarification	Australia
87.	18	Substantive	cuando las medidas <u>fitosanitarias</u> asociadas al rechazo de un envío en el punto de ingreso <u>resulten ineficientes</u> (por ejemplo, <u>tratamiento</u> su destrucción, reexportación o devolución al origen) <u>o</u> sean costosas o difíciles de aplicar;	Para clarificar y complementar el concepto	Costa Rica
88.	18	Technical	when measures associated with the refusal of a consignment at the point of entry (e.g. destruction, re-export, return to origin) are costly or difficult to apply	It is suggested to delete the bracket because it does not bring relevant details. (Re-export is not a typical measure, and a consignment is normally sent back to the exporting country, which may or may not be the country of origin.)	EPPO, European Union, Austria, Norway
89.	18	Technical	when measures associated with the refusal of a consignment at the point of entry (e.g. destruction, <u>cleaning</u> , re-export, return to origin) are costly or difficult to apply	Cleaning is also a measure used for non-compliant consignments.	Australia
90.	18	Technical	cuando las medidas asociadas al rechazo de un envío en el punto de ingreso (por ejemplo, su destrucción, reexportación, <u>reacondicionamiento</u> o devolución al origen) sean costosas o difíciles de aplicar;	Para completar las acciones fitosanitarias que pueden tomarse en el punto de ingreso.	Costa Rica
91.	19	Substantive	when inspection at the point of entry adversely affects commercial packaging (e.g. the commodity is individually wrapped and destructive sampling is required) or commodity quality (e.g. the commodity is <u>highly</u> perishable)	This situation will depend on how perishable is the commodity. And this example applies just for high perishable commodities.	Mexico, Peru
92.	19	Substantive	when inspection at the point of entry adversely affects commercial packaging (e.g. the commodity is individually wrapped and destructive sampling is required) or commodity quality (e.g. the commodity is <u>highly</u> perishable)	The example used is inappropriate because this situation will depend on how perishable is the commodity. And this example applies just for highly perishable commodities.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
93.	20	Substantive	when infrastructure is present in the exporting country to re-condition non-compliant consignments (e.g. cleaning); <u>when importing country does not have the infrastructure to address the non-compliance regarding regulated articles.</u>	To rephrase for better clarity to reflect that when importing country does not have the infrastructure to address the NC regarding regulated article instead of having a statement that appeared unclear and seemed to imply that as long as infrastructure is present in exporting country, the non-compliant consignment would be returned for re-conditioning i.e. rejected consignment etc.	APPPC, Singapore, Australia, New Zealand, Korea, Republic of, China

Comm no.	Para no.	Comment type	Comment	Explanation	Country
94.	20	Substantive	cuando el país exportador <u>no</u> cuente con infraestructura para <u>realizar inspecciones o pruebas</u> reacondicionar los envíos no conformes (por ejemplo, instalaciones de limpieza).	Para agregar un elemento más y para que no se pierda lo de reacondicionamiento se agrega en el párrafo 18	Costa Rica
95.	20	Technical	when <u>suitable</u> infrastructure is present in the exporting country to <u>bring non-compliant consignments into conformity with relevant import requirements</u> re-condition non-compliant consignments (e.g. cleaning treatment or cleaning).	Not clear what 're-condition' means. Suggested wording tries to explain more clearly what is intended. Additional examples added.	EPPO
96.	20	Technical	when <u>suitable</u> infrastructure is present in the exporting country to <u>bring non-compliant consignments into conformity with relevant phytosanitary import requirements</u> re-condition non-compliant consignments (e.g. treatment or cleaning).	Not clear what 're-condition' means. Suggested wording tries to explain more clearly what is intended. Additional examples added.	European Union, Austria
97.	20	Technical	when infrastructure is present in the exporting country to re-condition non-compliant consignments (e.g. cleaning).	The example is inappropriate because "cleaning" is more associated to quality issues rather than phytosanitary issues.	Mexico, Peru
98.	20	Technical	when infrastructure is present in the exporting country to re-condition non-compliant consignments (e.g. cleaning). <u>Meeting phytosanitary import requirements</u>	Changing the sentence to suit	PPPO
99.	20	Technical	when infrastructure is present in the exporting country to re-condition non-compliant consignments (e.g. cleaning).	The example used is inappropriate because "cleaning" is more associated to quality issues rather than phytosanitary issues.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
100.	21	Substantive	3. <u>Basic Conditions</u> Requirements for an Arrangement	It would be better to start off with the basic conditions for an arrangement in Section 3 including some later paragraphs in the draft for better presentation of information. Refer to "General Comments" for more details.	APPPC, Singapore, New Zealand, Thailand, Korea, Republic of, China
101.	21	Substantive	3. Requirements for an Arrangement	Suggest adding definition for a "work plan" in the IPPC glossary (for example, see NAPPO RSPM 19)	United States of America
102.	22	Substantive	The following requirements are applicable to all arrangements: <u>The arrangements should be for specified commodities.</u>	A new paragraph should be added to clarify that arrangements should not be made for general cases, but for specified commodities.	EPPO, European Union, Austria, Norway
103.	23	Editorial	An arrangement for allowing verification procedures for consignments <u>to</u> be performed	1) Plural for "consignments" (see title of the draft appendix). 2) It is clearer to specify "by the NPPO of the importing country".	EPPO, European Union,

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			by the NPPO of the importing country in the exporting country should be developed through consultation between the NPPO of the importing country and the NPPO of the exporting country, respecting the general principles of the IPPC regarding the responsibilities of both NPPOs.		Austria, Norway
104.	23	Editorial	An arrangement for allowing verification procedures for consignment to be performed in the exporting country should be developed jointly by through consultation between the NPPOs of the importing and exporting country and the NPPO of the exporting country , respecting the general principles of the IPPC regarding the responsibilities of both NPPOs.	For clarity.	Singapore
105.	23	Editorial	When developing A an arrangement for allowing verification procedures for consignment to be performed in the exporting country, it should be developed through joint consultation between the NPPOs of the importing country and the NPPO of the exporting country , respecting the general principles of the IPPC regarding the responsibilities of both NPPOs .	To shorten the sentence & to remove redundant words or sentence.	Australia, APPPC, New Zealand, Thailand, Korea, Republic of, China
106.	23	Editorial	An arrangement for allowing verification procedures for consignment to be performed in the exporting country should be developed through consultation between the NPPO of the importing country and the NPPO of the exporting country, respecting the general principles of the IPPC regarding the responsibilities of both NPPOs.	It's already mentioned in the draft what the arrangement are for.	Mexico, Peru
107.	23	Editorial	All An arrangements for allowing verification procedures for consignment to be performed in the exporting country should be developed through consultation between the NPPO of the importing country and the NPPO of the exporting country, respecting the general principles of the IPPC regarding the responsibilities of both NPPOs.	It's already mentioned in the draft what the arrangements are for.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
108.	23	Substantive	An arrangement for allowing verification procedures for consignment to be performed in the exporting country should be developed through consultation between the	Exporters are key to the success of the program and bear the financial responsibility.	United States of America

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			NPPO of the importing country and the NPPO of the exporting country, and their stakeholders , respecting the general principles of the IPPC regarding the responsibilities of both NPPOs.		
109.	24	Substantive	<p>When an arrangement is in place, minimal or no procedures should be carried out upon entry of the consignment in the importing country to verify compliance with phytosanitary import requirements. Reasons for additional checks or inspection procedures in the importing country may include:</p> <ul style="list-style-type: none"> •Checks of consignment documentation •Inspection of consignment where packaging has been compromised and the consignments phytosanitary integrity may have been compromised •Inspection of consignment for contaminant pests i.e. hitchhikers in containers •Inspection of consignment due to an emerging pest risk that was not known at the time of inspection in the exporting country •Verification of compliance of a consignment for other than phytosanitary purposes i.e. chemical residues •Inspection of consignment where an arrangement allows for a phytosanitary measure after offshore inspection has occurred i.e. intransit cold treatment for fruit flies 	To include reasons whereby NPPOs may consider additional checks.	APPPC, Singapore, New Zealand, Korea, Republic of, China

Comm no.	Para no.	Comment type	Comment	Explanation	Country
110.	24	Substantive	<p>When an arrangement is in place, minimal or no procedures should be carried out upon entry of the consignment in the importing country to verify compliance with phytosanitary import requirements. <u>Reasons for additional checks or inspection procedures in the importing country may include:</u></p> <ul style="list-style-type: none"> • <u>Checks of consignment documentation</u> • <u>Inspection of consignment where packaging has been compromised and the consignments phytosanitary integrity may have been compromised</u> • <u>Inspection of consignment for contaminant pests i.e. hitchhikers in containers</u> • <u>Inspection of consignment due to an emerging pest risk that was not known at the time of inspection in the exporting country</u> • <u>Verification of compliance of a consignment for other than phytosanitary purposes i.e. chemical residues</u> • <u>Inspection of consignment where an arrangement allows for a phytosanitary measure after of fshore inspection has occurred i.e. intransit cold treatment for fruit flies</u> • 	<p>This text is vague and it would be useful to list reasons why additional procedures may be required to verify compliance with phytosanitary import requirements. This guidance would help NPPOs understand what, if any, additional checks may be necessary and avoid NPPOs of importing countries repeating phytosanitary inspections (offshore and onshore) without justification.</p>	Australia
111.	24	Substantive	<p>When an arrangement is in place, minimal or no procedures should <u>could</u> be carried out upon entry of the consignment in the importing country to verify compliance with phytosanitary import requirements. <u>The NPPO of the importing country may reserve the right to conduct a point of entry inspection of the verified consignments.</u></p>	<p>We are not abdicating our authority to inspect these consignments to anyone. While not inspecting is just an option.</p>	United States of America

Comm no.	Para no.	Comment type	Comment	Explanation	Country
112.	24	Substantive	When an arrangement is in place, minimal or no procedures should be carried out upon entry of the consignment in the importing country to verify compliance with phytosanitary import requirements.	the quarantine technical inspection upon the arrival of the consignment to the importing country is a sovereign right because that different considerations such as the nature of product, the transport duration from the country of export, transport condition , certain laboratory tests are not available in the country of export etc.	Bahrain
113.	24	Substantive	When an arrangement is in place, minimal or no procedures should be carried out upon entry of the consignment in the importing country to verify compliance with phytosanitary import requirements. <u>Procedures in the importing country may include:</u> <ul style="list-style-type: none"> <u>Checks of consignment document and identity</u> <u>Checks of consignments where packaging has been compromised or the phytosanitary integrity of consignments may have been compromised</u> <u>Inspection of consignments for regulated pests that are not subjected to the verification procedure in the arrangement</u> 	Minimal procedures such as consignment document, identity, and integrity checks at the point of entry are necessary for compliance checking. Also, inspection of consignments at the point of entry may be necessary to determine if regulated pests (including hitchhikers) are present and/or to determine compliance with phytosanitary regulations that are not included in the bilateral arrangement for the verification procedure by the NPPO of the importing country in the exporting country.	Japan
114.	24	Technical	When an arrangement is in place, minimal or no <u>verification procedures that were already performed in the exporting country to verify compliance of a consignment with the phytosanitary import requirements</u> should not be carried out <u>required</u> upon entry of the consignment in the importing country to verify compliance with phytosanitary import requirements.	Clarity and precision of the text: there should be no duplication of the verifications of these consignments that are imported under the arrangements.	EPPO, Austria, Norway
115.	24	Technical	When an arrangement is in place, minimal or no <u>those verification procedures that were already performed in the exporting country to verify compliance of a consignment with the phytosanitary import requirements</u> should not be carried out <u>required</u> upon entry of the consignment in the importing country to verify compliance with phytosanitary import requirements.	Clarity and precision of the text: there should be no duplication of the verifications of these consignments that are imported under the arrangements.	European Union

Comm no.	Para no.	Comment type	Comment	Explanation	Country
116.	24	Technical	When an arrangement is in place, minimal or no <u>phytosanitary</u> procedures should be carried out upon entry of the consignment in the importing country to verify compliance with phytosanitary import requirements.	Extensive discussions on this article for "'minimal or no procedure'. There should be at least minimum procedures applied at the entry point. Phytosanitary procedures should be included everywhere instead of procedure, consistency across the document needs to be ensured.	NEPPO
117.	24	Technical	Cuando haya un acuerdo vigente, los procedimientos para verificar el cumplimiento de los requisitos fitosanitarios de importación a la entrada del envío en el país importador deberían reducirse al mínimo, o no realizarse.	Es necesario realizarse para comprobar la documentación y la identidad del envío en el punto de ingreso.	Costa Rica
118.	24	Translation	When an arrangement is in place, minimal or no procedures should be carried out upon entry of the consignment in the importing country to verify compliance with phytosanitary import requirements.	Paragraph 24 should be translated into Spanish as following: "Cuando haya un acuerdo vigente, los procedimientos para verificar el cumplimiento de los requisitos fitosanitarios de importación a la entrada del envío en el país importador no deberían realizarse o reducirse al mínimo."	Mexico, Peru
119.	24	Translation	When an arrangement is in place, minimal or no procedures should be carried out upon entry of the consignment in the importing country to verify compliance with phytosanitary import requirements.	The paragraph 24 should be translated into Spanish as following: "cuando haya un acuerdo vigente, los procedimientos para verificar el cumplimiento de los requisitos fitosanitarios de importación a la entrada del envío en el país importador, no deberían realizarse o deberían reducirse al mínimo"	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
120.	25	Editorial	The financial aspects of the arrangement should be agreed on by the NPPOs of the importing country and the exporting country. <u>To retain the word "should".</u>	The details of the bilateral arrangement should be established with agreement by both parties i.e. basis of the bilateral arrangement. If "may" is used, it would imply that the bilateral arrangement itself does not require agreement by both parties - no need for an arrangement in this instance.	APPPC, Korea, Republic of, China
121.	25	Editorial	The financial aspects of the arrangement should be agreed on by the NPPOs of the importing country and the exporting country.	More appropriate wording	United States of America
122.	25	Editorial	The financial aspects of the arrangement should be agreed on by the NPPOs <u>in consultation with industries</u> of the importing country and the exporting country.	NPPOs to consult with industries	PPPO
123.	25	Substantive	The financial aspects of the arrangement should be agreed on by the NPPOs <u>involved, taking into account of which parties will benefit from the savings on expenditure in the country of import envisaged from the arrangement</u> of the importing country and the exporting country.	Clearer English, with an attempt at a balanced approach to the financing of the arrangements. NPPOs should agree on the financial arrangements, and doing so they should take into account the cost savings foreseen.	EPPO, European Union, Austria

Comm no.	Para no.	Comment type	Comment	Explanation	Country
124.	25	Substantive	The financial aspects of the arrangement should be agreed on by the NPPOs <u>and industries</u> of the importing country and the exporting country.	NPPOs will need to consult on the financial aspects of these arrangements with industry.	Australia
125.	26	Editorial	<u>Prior to entering the agreement, a work plan should be developed outlining</u> The arrangement should specify the technical details as well as <u>and may include</u> the conditions for scaling down inspection levels and suspending or terminating the arrangement.	"and may include" - Not all arrangements need to be scaled down or terminated.	United States of America
126.	26	Substantive	The arrangement should specify the technical details as well as the conditions for scaling down inspection levels and suspending or terminating the arrangement.	Move the last part of this part to paragraph 27.	EPPO, European Union, Austria, Norway
127.	26	Substantive	The arrangement should specify the technical <u>& operational</u> details as well as the conditions for scaling down <u>reducing compliance verification measures, inspection levels</u> and suspending or terminating the arrangement.	The arrangement should also include the operational aspects. "Scaling down" is not a commonly used phrase - best to use simpler & direct words i.e reducing compliance verification measures. Also, inspection levels may not be the only measure to be reduced under the arrangement & hence the sentence should be more inclusiveness i.e other measures.	APPPC, Australia, New Zealand, Thailand, Korea, Republic of, China
128.	26	Substantive	The arrangement should specify the technical <u>and operational</u> details, as well as the conditions for scaling down inspection levels <u>compliance verification</u> and suspending or terminating the arrangement.	Operation details are important to ensure that the arrangement is feasible.	Singapore
129.	26	Substantive	The arrangement should specify the technical details as well as the conditions for scaling down inspection levels <u>verification activities</u> and suspending or terminating the arrangement.	What should be specified are details for scaling down verification activities but not inspection levels.	COSAVE, Mexico, Argentina, Peru, Chile, Uruguay, Paraguay
130.	26	Substantive	The arrangement should specify the technical details as well as the conditions for scaling down inspection levels <u>activities</u> and suspending or terminating the arrangement.	What should be specified are the details for scaling down inspection activities but not inspection levels.	Brazil
131.	26	Substantive	En el acuerdo deberían especificarse los detalles técnicos y las condiciones para reducir los niveles de inspección <u>en el país exportador y posteriormente</u> suspender o rescindir el acuerdo.	Para clarificar dónde deben reducirse los niveles de inspección y completar la oración.	Costa Rica
132.	26	Technical	The <u>condition of the</u> arrangement should specify the technical details as well as the conditions for scaling down inspection levels and suspending or terminating the arrangement.	removed scaling down and added condition of the in the beginning of the sentence	PPPO

Comm no.	Para no.	Comment type	Comment	Explanation	Country
133.	27	Substantive	The arrangement may have a limited time frame, in which case this should be specified. <u>The conditions for suspending or terminating the arrangement should be specified.</u>	More logical place to mention this instead of paragraph 26, suppression of the words "scaling down" because they seem not appropriate in the general context of logistics-justified pre-clearance agreements.	EPPO, European Union, Austria, Norway
134.	28	Editorial	The arrangement should be subjected to regular review.	Editorial correction	NEPPO
135.	28	Substantive	The arrangement should be subject to regular review. <u>Any actions undertaken by the NPPO of the importing country in the exporting country under an arrangement are subjected to and must comply with the legislation of the exporting country.</u>	Moved from paragraph 73 because added text is a requirement.	Mexico, Peru
136.	28	Substantive	The arrangement should be subject to regular review <u>and a mechanism put in place to handle any changes that may arise.</u>	This will allow for handling changes that might occur	Barbados, Jamaica, Belize, Guyana
137.	28	Substantive	The arrangement may should be subject to regular review.	May is a lighter word as this needs to be based by the bilateral agreement.	NEPPO
138.	28	Substantive	The arrangement should be subject to regular review. <u>Any actions undertaken by the NPPO of the importing country in the exporting country under an arrangement are subject to and must comply with the legislation of the exporting country.</u>	Moved from paragraph 73 because added text is a requirement.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
139.	29	Translation	4. Process for Establishing an Arrangement	"process for" should be translated into Spanish as "proceso de"	Mexico, Peru
140.	29	Translation	4. Process for Establishing an Arrangement	The expression "process for" should be translated into Spanish as "proceso de"	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
141.	32	Editorial	The NPPO of the importing country may propose an arrangement to the NPPO of the exporting country <u>and vice versa</u> . The proposal should be assessed by the NPPO of the exporting country to determine whether the proposed arrangement would meet the requirements of this appendix. The initiative to establish an arrangement may also come from the NPPO of the exporting country. Regardless of the origin, t he proposal may be in response to a need	para 35 -38 should be under the proposal & not under evaluation.	APPPC, New Zealand

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			identified by the initiating NPPO or by industry representatives. <u>Other factors that may be considered in the proposal include: para 35 - 38.</u>		
142.	32	Editorial	The NPPO of the importing country may propose an arrangement to the NPPO of the exporting country <u>and vice versa</u> . The proposal should be assessed by <u>both</u> the NPPOs of the exporting country to determine whether the proposed arrangement would meet the requirements of this appendix. The initiative to establish an arrangement may also come from the NPPO of the exporting country. Regardless of the origin, the proposal may be in response to a need identified by the initiating NPPO or by industry representatives.	For clarity.	Singapore
143.	32	Editorial	The NPPO of the importing country may propose an arrangement to the NPPO of the exporting country. The proposal should be assessed by the NPPO of the exporting country to determine whether the proposed arrangement would meet the requirements of this <u>supplement</u> appendix . The initiative to establish an arrangement may also come from the NPPO of the exporting country. Regardless of the origin, the proposal may be in response to a need identified by the initiating NPPO or by industry representatives.	Change to supplement.	Australia
144.	32	Editorial	The NPPO of the importing country may propose an arrangement to the NPPO of the exporting country <u>and vice versa</u> . The proposal should be assessed by the NPPO of the exporting country to determine whether the proposed arrangement would meet the requirements of this appendix. The initiative to establish an arrangement may also come from the NPPO of the exporting country. Regardless of the origin, the proposal may be in response to a need identified by the initiating NPPO or by industry representatives.	para 35 -38 should be under the proposal & not under evaluation.	Thailand
141.	32	Editorial	The NPPO of the importing country may propose an arrangement to the NPPO of the exporting country <u>and vice versa</u> . The proposal should be assessed by the NPPO of the exporting country to	para 35 -38 should be under the proposal & not under evaluation.	Korea, Republic of, China

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			determine whether the proposed arrangement would meet the requirements of this appendix. The initiative to establish an arrangement may also come from the NPPO of the exporting country. Regardless of the origin, the proposal may be in response to a need identified by the initiating NPPO or by industry representatives. <u>Other factors that may be considered in the proposal include: para 35 - 38.</u>		
146.	32	Editorial	The NPPO of the importing <u>or exporting</u> country may propose <u>should initiate the request for</u> an arrangement to the NPPO of the exporting country. The proposal should be assessed by the NPPO of the exporting country to determine whether the proposed arrangement would meet the requirements of this appendix. The initiative to establish an arrangement may also come from the NPPO of the exporting country. Regardless of the origin, the proposal may be in response to a need identified by the initiating NPPO or by industry representatives.	Too redundant and detailed.	United States of America
147.	32	Editorial	The NPPO of the importing country may propose an arrangement to the NPPO of the exporting country. The proposal should be assessed by the NPPO of the exporting country to determine whether the proposed arrangement would meet the <u>guidelines or conditions</u> requirements of this appendix. The initiative to establish an arrangement may also come from the NPPO of the exporting country. Regardless of the origin, the proposal may be in response to a need identified by the initiating NPPO or by industry representatives.	removed required and included guidelines of conditions	PPPO
148.	32	Substantive	The NPPO of the importing country may propose an arrangement to the NPPO of the exporting country. The proposal should be assessed by the NPPO of the exporting country to determine whether the proposed arrangement would <u>be acceptable and feasible, taking into account whether it would</u> meet the requirements of this annex <u>appendix</u> . The initiative to establish an arrangement may also come from the NPPO of the exporting country.	The NPPO should evaluate any proposal in relation to its own legislation and situation. ISPMs (including annexes) do not have the legal status to take power over national legislation. The last sentence is delete since proposals for an arrangement should come from NPPOs. It is up to the NPPOs to determine how they communicate with their industry.	EPPO, Austria, Norway

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			Regardless of the origin, the proposal may be in response to a need identified by the initiating NPPO or by industry representatives.		
149.	32	Substantive	The NPPO of the importing country may propose an arrangement to the NPPO of the exporting country. The proposal should be assessed by the NPPO of the exporting country to determine whether the proposed arrangement would <u>facilitate trade logistics and be acceptable and feasible, taking into account whether it would</u> meet the requirements of this annex <u>appendix</u> . The initiative to establish an arrangement may also come from the NPPO of the exporting country. Regardless of the origin, the proposal may be in response to a need identified by the initiating NPPO or by industry representatives.	The NPPO should evaluate any proposal in relation to its own legislation and situation. ISPMs (including annexes) do not have the legal status to take power over national legislation. The last sentence is delete since proposals for an arrangement should come from NPPOs. It is up to the NPPOs to determine how they communicate with their industry.	European Union
150.	32	Substantive	The NPPO of the importing country may propose an arrangement to the NPPO of the exporting country. The proposal should be assessed by the NPPO of the exporting country to determine whether the proposed arrangement would meet the requirements of this appendix. The initiative to establish an arrangement may also come from the NPPO of the exporting country. Regardless of the origin, t <u>The proposal for an arrangement</u> may be in response to a need identified by the initiating NPPO or by industry representatives.	Text deleted because it is described on the Section 1, paragraph 13.	Mexico, Peru
151.	32	Substantive	The NPPO of the importing country may propose an arrangement to the NPPO of the exporting country. The proposal should be assessed by the NPPO of the exporting country to determine whether the proposed arrangement would meet the requirements of this appendix. The initiative to establish an arrangement may also come from the NPPO of the exporting country. Regardless of the origin, t <u>The proposal for an arrangement</u> may be in response to a need identified by the initiating NPPO or by industry representatives.	Text deleted because it is described on the section 1, paragraph (13).	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay

Comm no.	Para no.	Comment type	Comment	Explanation	Country
152.	32	Technical	The NPPO of the importing country may propose an arrangement to the NPPO of the exporting country. The proposal should be assessed by the NPPO of the exporting country to determine whether the proposed arrangement would meet the requirements of this appendix. The initiative to establish an arrangement may also come from the NPPO of the exporting country. Regardless of the origin, the proposal may be in response to a need identified by the initiating NPPO or by industry representatives.	More clarification is requested for the word "industry" as it is ambiguous and creates confusion.	NEPPO
153.	34	Editorial	The NPPO receiving the proposal for an arrangement should undertake a timely review of the proposal and prepare a response for the NPPO initiating the proposal . Evaluation of the proposal should encompass pest risk concerns, operational and economic feasibility, and regulatory aspects. Other factors that may be considered in the evaluation include:	To avoid redundancy.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
154.	34	Substantive	The NPPO receiving the proposal for an arrangement should undertake a timely review of the proposal and prepare a response for the NPPO initiating the proposal. Evaluation of the proposal should encompass pest risk concerns, operational and economic feasibility, <u>timing and duration</u> , and regulatory aspects. Other factors that may be considered in the evaluation include:	Timing and duration are important elements for the evaluation of the proposal and therefore should be mentioned in the introductory paragraph.	EPPO, European Union, Austria, Norway
155.	34	Substantive	The NPPO receiving the proposal for an arrangement should undertake a timely review of the proposal and prepare a response for the NPPO initiating the proposal. Evaluation of the proposal should encompass pest risk concerns, <u>pest mitigation measures</u> , operational and economic feasibility, and regulatory aspects. Other factors that may be considered in the evaluation include:	Pest mitigation measures are important component in the arrangement after the pest risk has been identified.	APPPC, Korea, Republic of, China
156.	34	Substantive	The NPPO receiving the proposal for an arrangement should undertake a timely review of the proposal and prepare a response for the NPPO initiating the proposal. Evaluation of the proposal should encompass pest risk concerns, <u>pest mitigation measures</u> , operational and economic	Pest mitigation measures are important in such an arrangement.	Singapore

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			feasibility, and regulatory aspects. Other factors that may be considered in the evaluation include:		
157.	34	Substantive	The NPPO receiving the proposal for an arrangement should undertake a timely review of the proposal and prepare a response for the NPPO initiating the proposal. Evaluation of the proposal should encompass pest risk concerns, operational and economic feasibility, and regulatory aspects <u>(including financial responsibilities)</u> . Other factors that may be considered in the evaluation include: <u>appropriateness of inspection for quarantine pests at the point of export. It may not be possible to identify quarantine pests at the point of export due to their life stage, whilst development in transit may make the pest detectable at inspection in the importing country. i.e. a pathogen in a symptomless incubation life stage at export.</u>	Part of the evaluation of a proposal would include looking at financial responsibilities. An important point in evaluation of a proposal is determining whether a quarantine pest will be in a detectable lifestage at the point of export.	Australia
158.	34	Substantive	The NPPO receiving the proposal for an arrangement should undertake a timely review of the proposal and prepare a response for the <u>reply with an evaluation and in a timely manner to the</u> NPPO initiating the proposal <u>without undue delay</u> . Evaluation of the proposal should encompass pest risk concerns, operational and economic feasibility, and regulatory aspects <u>and an onsite assessment</u> . Other factors that may be considered in the evaluation include:	"evaluation in a timely manner" - For consistency with other ISPMs. "Onsite assessment" - For feasibility of developing such bilateral agreements.	United States of America
159.	34	Substantive	The NPPO receiving the proposal for an arrangement should undertake a timely review of the proposal and prepare a response for the NPPO initiating the proposal. Evaluation of the proposal should encompass pest risk concerns, operational and economic feasibility, and regulatory aspects. Other factors that may <u>should</u> be considered in the evaluation include:	The factors mentioned in paragraph 35 to 38 should be evaluated in any arrangement.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
160.	34	Translation	The NPPO receiving the proposal for an arrangement should undertake a timely review of the proposal and prepare a response for the NPPO initiating the	First sentence should be translated into Spanish as following: "La ONPF que recibe la propuesta de un acuerdo debería examinarla en un tiempo oportuno y preparar una respuesta a la	COSAVE, Mexico, Argentina, Peru, Brazil,

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			proposal. Evaluation of the proposal should encompass pest risk concerns, operational and economic feasibility, and regulatory aspects. Other factors that may be considered in the evaluation include:	ONPF de la que parte la propuesta"	Chile, Uruguay, Paraguay
161.	35	Editorial	timing and duration of the arrangement <u>proposed operations</u>	More appropriate terminology	United States of America
162.	35	Substantive	timing and duration of the arrangement	This has been moved to paragraph 34.	EPPO, European Union, Austria, Norway
163.	35	Substantive	timing and duration of the arrangement <u>Other factors that may be considered in the proposal include : followed by para 35-38 should be transferred to under para 32 i.e. Proposal.</u>	These factors should be discussed under the proposal .	APPPC, Singapore, Korea, Republic of, China
164.	35	Translation	timing and duration of the arrangement	The expression “timing” should be translated into Spanish as “momento”.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
165.	36	Editorial	proposed <u>workload and resource needs</u> activity levels and, when appropriate, sampling schemes for specified commodities	More appropriate wording – activity levels is vague	United States of America
166.	36	Substantive	proposed activity levels and, when appropriate, sampling schemes for specified commodities <u>and quarantine pests</u>	To be in line iwth ISPM 31 which touched upon sampling based on commodities and quarantine pests as well.	APPPC, Singapore, Korea, Republic of, China
167.	36	Substantive	proposed activity levels and, when appropriate, sampling schemes for specified commodities <u>and quarantine pests.</u>	We would like to propose the word "and quarantine pests" at the end of this sentence in order to be in accordance with the guidelines in ISPM 31, which states that "selection of an appropriate sampling method is necessarily dependent on information available about pest incidence and distribution in the consignment". Normally, the arrangement that we establish we do for particular commodity and pest not for all commodities and pests. So the other factor that NPPO of exporting country may consider other than “sampling schemes for specified commodities” it should be “quarantine pest”.	Thailand
168.	36	Technical	proposed activity <u>verification</u> levels and, when appropriate, sampling schemes for specified commodities	clarification fromn the word "activity"	EPPO, European Union, Austria, Norway

Comm no.	Para no.	Comment type	Comment	Explanation	Country
169.	36	Technical	proposed activity levels and, when appropriate, sampling schemes for specified commodities	Moved to paragraph 63 because sampling schemes may be part of the phytosanitary actions of an arrangement.	Mexico, Peru
170.	36	Technical	proposed activity levels and, when appropriate, sampling schemes for specified commodities	Moved to Paragraph 63 because sampling schemes may be part of the phytosanitary actions of an arrangement.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
171.	37	Editorial	criteria that could initiate trigger review and evaluation of the arrangement	more appropriate wording	Australia
172.	37	Editorial	criteria that could result in trigger review and evaluation of the arrangement	More appropriate wording, especially for non-native English speakers	United States of America
173.	37	Editorial	criteria that could trigger initiate review and evaluation of the arrangement	removed trigger with initiate	PPPO
174.	38	Editorial	criteria that could initiate trigger suspension or termination of the arrangement.	More appropriate wording.	Australia
175.	38	Editorial	criteria that could trigger result in suspension or termination of the arrangement.	More appropriate wording, especially for non-native English speakers	United States of America
176.	39	Editorial	If the proposal is assessed as suitable to proceed with, the NPPOs of the importing country and the exporting country may proceed to develop the arrangement.	Unnecessary wording	EPPO, European Union, Austria, Norway
177.	39	Editorial	If the proposal is assessed as suitable to proceed with, the NPPOs of the importing country and the exporting country may proceed to develop the arrangement.	This sentence appears to be redundant.	Singapore
178.	39	Editorial	If the proposal is assessed as suitable to proceed with , the NPPOs of the importing country and the exporting country may proceed to develop the arrangement.	Grammatical	Australia
179.	39	Editorial	If the proposal is assessed accepted as suitable to proceed with, the NPPOs of the importing country and the exporting country countries may proceed to develop the arrangement.	To make the wording more concise	United States of America
180.	39	Substantive	If the proposal is assessed as suitable to proceed with, the NPPOs of the importing country and the exporting country may proceed to develop the arrangement.	This sentence is redundant since the intent of the proposal was to establish the arrangement.	APPPC, Australia, New Zealand, Thailand, Korea, Republic of, China
181.	40	Editorial	4.3 Development of an arrangement	Copied from [52], which is proposed for deletion to avoid duplication.	EPPO, European Union, Austria, Norway

Comm no.	Para no.	Comment type	Comment	Explanation	Country
182.	40	Editorial	4.3 Development and Formalization	Editorial change because content of the section Formalization is proposed to be included under new section Content of an Arrangement.	Mexico, Peru
183.	40	Editorial	4.3 Development and Formalization	Editorial change because content of the section “formalization” is proposed to be included under new section “Content of an Arrangement”.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
184.	40	Substantive	4.3 Development Refer to under General comments for the proposed re-structuring of section 4 & 5.	To be clearer in the presentation of information.	APPPC, Singapore, Korea, Republic of, China
185.	41	Editorial	The NPPO proposing an arrangement – working though it works collaboratively with the other NPPO – has primary responsibility for the development of both new and revised arrangements. As with new arrangements, revision of existing arrangements requires the agreement of the NPPOs of the importing country and the exporting country before implementation.	Clearer English	EPPO, European Union, Austria, Norway
186.	41	Editorial	The NPPO proposing an arrangement – though it works collaboratively with the other NPPO – has <u>the</u> primary responsibility for the development of both new and revised arrangements. As with new arrangements, revision of existing arrangements requires the <u>joint</u> agreement of <u>both</u> the NPPOs of the importing <u>country</u> and the exporting country before implementation.	For clarity.	Singapore
187.	41	Editorial	The NPPO proposing an arrangement – though it works collaboratively with the other NPPO – has primary responsibility for the development of both new and revised arrangements. As with new arrangements, revision of existing arrangements requires the agreement <u>and its formalization by</u> of the NPPOs of the importing country and the exporting country before implementation.	Consequential change as per comment in paragraph 40	Mexico, Peru
188.	41	Editorial	The NPPO proposing an arrangement – though it works collaboratively with the other NPPO – has primary responsibility for the <u>its</u> development of both new and revised	For clear and concise language without redundancy.	United States of America

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			arrangements. Both NPPOs must agree to new or revised proposals before implementations. As with new arrangements, revision of existing arrangements requires the agreement of the NPPOs of the importing country and the exporting country before implementation.		
189.	41	Editorial	The NPPO proposing an arrangement – though it works collaboratively with the other NPPO – has primary responsibility for the development of both new and revised arrangements. As with new arrangements, revision of existing arrangements requires the agreement <u>and its formalization by</u> of the NPPOs of the importing country and the exporting country before implementation.	Consequential change as per comment in paragraph 40.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
190.	41	Substantive	The NPPO proposing an arrangement – though it works collaboratively with the other NPPO – has primary responsibility for the development of both new and revised arrangements. As with new arrangements, revision of existing arrangements requires the agreement of the NPPOs of the importing country and the exporting country before implementation.	This section relates to establishment of an arrangement, whereas this sentence relates to revision of existing arrangements. Suggest the sentence is moved to section 7 and the heading of section 7 is changed to 'revision'.	EPPO, European Union, Austria, Norway
191.	41	Substantive	The NPPO proposing an arrangement – though it works collaboratively with the other NPPO – has <u>the</u> primary responsibility for the development of both new and revised arrangements. As with new arrangements, revision of existing arrangements requires the agreement of the <u>both</u> NPPOs of the importing country and the exporting country before implementation. <u>To shift this para to under Section 3:Requirements</u>	The sentence has been amended for clarity and it is more appropriate to be under Section 3: Requirements.	APPPC, New Zealand, Korea, Republic of, China
192.	42	Editorial	4.4 Formalization <u>Elements of the Arrangement</u>	The title does not cover the content of this section. As a general point the titles of the sections in chapter 4 and chapter 5 need sorting to clarify the structure of the text.	EPPO, European Union, Austria, Norway
193.	42	Substantive	4.4 Formalization	Moved to paragraph 40. The content under section Formalization does not refer to this concept but to the elements that may be included in an arrangement. For this reason paragraphs 43 to 51 are proposed to be included in new section 5 "Content of an arrangement"	Mexico, Peru

Comm no.	Para no.	Comment type	Comment	Explanation	Country
194.	42	Substantive	4.4 Formalization	Moved to Paragraph 40. The content under section "Formalization" does not refer to this concept but to the elements that may be included in an arrangement. For this reason paragraphs 43 to 51 are proposed to be included in new section 5 "Content of an Arrangement".	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
195.	43	Editorial	Elements of the arrangement that may need to be discussed between the NPPOs of the importing country and the exporting country before an agreement is formalised and implemented its development and implementation include:	clarification in wording.	Australia
196.	43	Substantive	Elements of the arrangement that may need to be discussed between the NPPOs of the importing country and the exporting country before its development and implementation include: <u>The problem to be addressed.</u>	New first bullet point under paragraph 43. The logical starting point is to clarify and agree on what the problem is that requires a verification arrangement.	EPPO, European Union, Austria, Norway
197.	43	Substantive	Elements of the arrangement that may need to be discussed between the NPPOs of the importing country and the exporting country before its development and implementation include:	See comments in paragraph 42.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
198.	43	Technical	Elements of the arrangement that may need to be discussed <u>and agreed</u> between the NPPOs of the importing country and the exporting country before its development and implementation <u>may</u> include:	Added for clarity	EPPO, Austria, Norway
199.	43	Technical	Elements of the arrangement that may need to be discussed <u>agreed</u> between the NPPOs of the importing country and the exporting country before its development and implementation <u>may</u> include:	Replaced and added for clarity	European Union
200.	43	Translation	Elements of the arrangement that may need to be discussed between the NPPOs of the importing country and the exporting country before its development and implementation include:	"discussed" should be translated into Spanish as "discutir"	COSAVE, Mexico, Argentina, Peru, Brazil, Chile, Uruguay, Paraguay
201.	43	Translation	Antes de su elaboración e implementación, las ONPF del país importador y del país exportador podrán tener que discutir <u>debatir</u> los siguientes elementos del acuerdo:	Términos más adecuados en español.	Costa Rica
202.	44	Substantive	<u>sampling &</u> inspection of the consignment	Refer to para 5.1.5.2 of ISPM 20. Sampling is a required step before inspection.	APPPC, Australia, Korea,

Comm no.	Para no.	Comment type	Comment	Explanation	Country
					Republic of, China
203.	44	Substantive	inspection <u>and sampling</u> of the consignment	The word "and sampling" should be added after "inspection" to fulfil the compliance procedures at import (Refer to section 5.1.5.2 of ISPM 20). Sampling is an importance activity that NPPO of both exporting and importing countries need to be discussed and agree on before develop the arrangement. In section 4.4: Formalization of this draft standard has already refer or mention about inspection and testing but "sampling" has not yet.	Thailand
204.	44	Substantive	inspection of the consignment	See comments in paragraph 42 and moved to paragraph 63	Mexico, Peru
205.	44	Substantive	inspection of the consignment	See comments in paragraph 42 and moved to paragraph 63.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
206.	44	Technical	<u>verification</u> inspection of the consignments	This is about a system for more than one consignments; it has already been recalled that the SC preferred the word "verification" to "inspection".	EPPO
207.	44	Technical	<u>verification</u> inspection of the consignments	This is about a system for more than one consignments; it has already been recalled that the SC preferred the word "verification" to "inspection".	European Union, Austria
208.	44	Technical	inspection of the consignment	This is relevant for actual implementation of the agreement	United States of America
209.	45	Substantive	<u>[new item] adequacy of inspection facilities</u> <u>sampling and</u> testing procedures	Sampling procedure is an important element to consider.	Singapore
210.	45	Substantive	testing procedures	See comments in paragraph 42 and moved to paragraph 63.	Mexico, Peru
211.	45	Substantive	testing procedures	See comments in paragraph 42 and moved to paragraph 63.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
212.	46	Editorial	verification of treatments <u>s</u>	See comment par 44	EPPO, European Union, Austria, Norway
213.	46	Substantive	verification of treatment	See comments in paragraph 42 and moved to paragraph 63.	Mexico, Peru

Comm no.	Para no.	Comment type	Comment	Explanation	Country
214.	46	Substantive	verification of treatment	Deleted because is already included in paragraph 63.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
215.	46	Technical	verification of treatment [new item] certification of treatment facilities	This is relevant for actual implementation of the agreement	United States of America
216.	46	Technical	verification of treatment <u>procedures</u>	included procedures in the sentence	PPPO
217.	47	Substantive	verification of consignment integrity	See comments in paragraph 42 and moved to paragraph 63.	Mexico, Peru
218.	47	Substantive	verification of consignment integrity	Deleted because is already included in paragraph 63.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
219.	48	Editorial	the time and location for verification of compliance of the consignments <u>s</u>	See par 44	EPPO, European Union, Austria, Norway
220.	48	Substantive	the time and location for verification of compliance of the consignment	See comments in paragraph 42.	Mexico, Peru
221.	48	Substantive	the time and location for verification of compliance of the consignment	See comments in paragraph 42.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
222.	48	Technical	the time and location for <u>the different steps of the</u> verification of compliance of the consignment	The time and location of the different steps of the verification of compliance (inspection i.e. visual examination, testing, verification of treatment, verification of consignment integrity) can be different.	EPPO, European Union, Austria, Norway
223.	49	Substantive	notification to the point of entry of the arrival of the consignment <u>Notification to the import country of the arrival information of the consignment (such as the entry port, the arrival time and the quantity)</u>	When import country get the information of the verified consignment in advance, the consignment would be released quickly.	China
224.	49	Substantive	notification to the point of entry of the arrival of the consignment	See comments in paragraph 42.	Mexico, Peru
225.	49	Substantive	notification to the point of entry of the arrival of the consignment	See comments in paragraph 42.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
226.	50	Substantive	assignment of qualified staff to implement provisions under the arrangement	See comments in paragraph 42.	Mexico, Peru

Comm no.	Para no.	Comment type	Comment	Explanation	Country
227.	50	Substantive	assignment of qualified staff to implement provisions under the arrangement	See comments in paragraph 42.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
228.	50	Technical	assignment of qualified staff to implement provisions under the arrangement <u>availability of qualified staff (including their proper credentials) to implement the</u>	It is crucial that qualified staff are available to conduct the work under the agreement.	United States of America
229.	50	Translation	assignment of qualified staff to implement provisions under the arrangement	"qualified" is more frequently translated as "calificado" into Spanish	COSAVE, Mexico, Argentina, Peru, Brazil, Chile, Uruguay, Paraguay
230.	50	Translation	la asignación de personal calificado <u>calificado</u> para aplicar las disposiciones del acuerdo;	Mejor término en español	Costa Rica
231.	51	Substantive	timing of the activities for the verification of compliance; for example, before or after issuance of the phytosanitary certificate by the NPPO of the exporting country.	See comments in paragraph 42.	Mexico, Peru
232.	51	Substantive	timing of the activities for the verification of compliance; for example, before or after issuance of the phytosanitary certificate by the NPPO of the exporting country.	See comments in paragraph 42.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
233.	52	Editorial	5. Development of an Arrangement	Section 4.3 is already called "development", and the title is confusing. The headings should simply clearly indicate what material can be found where, and not attempt to provide a template for an agreement. It is suggested that the SC and stewards find a logical succession of titles for the paragraph.	EPPO, European Union, Austria, Norway
234.	52	Editorial	5. Development of an Arrangement <u>5. Technical Information Requirements</u>	The title of section 5 "Development of an Arrangement" should be reconsidered because it is not in line with the content under this section. The new title "Technical Information Requirements of an Arrangement" may be more appropriate.	Thailand
235.	52	Substantive	5. Development of an Arrangement <u>refer to under General comments on the proposed restructuring of Section 4 & 5.</u>	for better presentation of information.	APPPC, Singapore, New Zealand, Korea, Republic of, China
236.	52	Substantive	45. Development of an Arrangement	The development of an arrangement should be before the establishment of an arrangement.	Australia
237.	52	Technical	5. Content <u>Development of an Arrangement</u>	This section describe the information that an arrangement may include.	Mexico, Peru

Comm no.	Para no.	Comment type	Comment	Explanation	Country
238.	52	Technical	5. Development of an Arrangement <u>Content of an Arrangement</u>	This section describes the information that an arrangement may include.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
239.	53	Technical	The technical requirements for an arrangement should be determined and developed on a case-by-case basis and should be described in the operational details of the arrangement.	"operational details" is unclear and superfluous.	EPPO, European Union, Austria, Norway
240.	53	Technical	The technical requirements for an arrangement should be determined and developed on a case-by-case basis and should be described in the operational details of the arrangement.	Text deleted because we are proposing to group the required information into subsections (general and technical)	Mexico, Peru
241.	53	Technical	The technical requirements for an arrangement should be determined and developed on a case-by-case basis and should be described in the operational details of the arrangement.	Text deleted because we are proposing to group the required information into subsections (general and technical).	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
242.	54	Editorial	The details of the arrangement may include specific information on <u>general and technical aspects</u> :	See comment in paragraph 53	Mexico, Peru
243.	54	Editorial	The details of the arrangement may include specific information on <u>general and technical aspects</u> :	See comments in paragraph 53.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
244.	54	Substantive	The details of the arrangement may include specific information on: <ul style="list-style-type: none"> <u>Title</u> <u>Definitions and Abbreviations</u> 	An arrangement could first specify the title of the arrangement and include definitions and abbreviations used in the document	Canada
245.	54	Technical	The details of the arrangement may include specific information on: <p><u>5.1 General aspects</u></p>	To provide a better understanding.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
246.	55	Translation	autoridades jurídicas y de <u>reglamentación legales competentes</u> ;	Mejor término en español	Costa Rica
247.	56	Technical	phytosanitary <u>and other relevant</u> legislation or regulations	other legislation could be applicable.	EPPO, European Union, Austria, Norway

Comm no.	Para no.	Comment type	Comment	Explanation	Country
248.	56	Translation	phytosanitary legislation or regulations	Glossary term for "phytosanitary regulations" in Spanish is "reglamentaciones fitosanitarias"	Mexico, Peru
249.	56	Translation	phytosanitary legislation or regulations	Glossary term for "phytosanitary regulations" in Spanish is "reglamentaciones fitosanitarias"	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
250.	56	Translation	legislación <u>fitosanitaria</u> o reglamentos fitosanitarios;	Terminología aprobada	Costa Rica
251.	57	Editorial	participating organizations (<u>and their roles and responsibilities (including those of NPPOs, exporters and growers)</u>)	More logic to merge paragraph 57 and 58	Norway
252.	57	Substantive	<u>roles and responsibilities related to the arrangement</u> participating organizations	Proposal is to merge paragraphs 57 and 58 and being more general about the participating organizations. Organizations or e.g. producers that are not part of the arrangement might still face the consequences of the arrangement.	EPPO
253.	57	Substantive	<u>roles and responsibilities related to the arrangement</u> participating organizations	Proposal is to merge paragraphs 57 and 58 and being more general about the participating organizations. Organizations or e.g. producers that are not part of the arrangement might still face the consequences of the arrangement.	European Union, Austria
254.	57	Substantive	participating organizations	Relevant parties already covered in other bullet points.	APPPC, Australia, New Zealand, Korea, Republic of, China
255.	57	Substantive	participating organizations	To delete this reference since all parties/organisations have been covered under other bullet points.	Singapore
256.	58	Editorial	roles and responsibilities (including those of NPPOs, exporters and growers)	more logic to merge paragraph 57 and 58	Norway
257.	58	Substantive	roles and responsibilities (including those of NPPOs, exporters and growers)	moved to par 57, more logic and see the explanation in par 56.	EPPO
258.	58	Substantive	roles and responsibilities (including those of NPPOs, exporters and growers)	moved to par 57, more logic and see the explanation in par 56.	European Union, Austria
259.	59	Substantive	approved growers and exporters	It is not appropriate to refer to approved growers and exporters in this annex. The new wording of paragraph 57 covers the roles of parties involved.	EPPO, European Union, Austria, Norway
260.	59	Substantive	approved growers and exporters <u>approval system for growers & exporters.</u>	To avoid referring to the list of approved growers & exporters to be included under the bilateral arrangement which may not be	APPPC, Singapore, Australia, Korea, Republic of,

Comm no.	Para no.	Comment type	Comment	Explanation	Country
				included in the consideration of the bilateral arrangement but provided after establishment of arrangement. Under the (revised) Administrative Requirements: having a approval system for growers and exporters would be a prerequisite to provide the details of the approved growers & exporters.	China
261.	60	Substantive	duration of activities <u>timing and duration of the proposed operations</u>	To match above section "Evaluation"	United States of America
262.	60	Technical	<u>timing of the</u> duration of activities	To clarify that this point is about the timing of the activities within the agreed arrangement, as a distinction from the timing and duration of the arrangement itself as mentioned in par 34.	EPPO, European Union, Austria, Norway
263.	61	Editorial	regulated articles <u>concerned</u>	More precise.	EPPO, European Union, Austria, Norway
264.	61	Substantive	los artículos reglamentados <u>considerando su uso previsto;</u>	Clarificar	Costa Rica
265.	61	Technical	regulated articles <u>the time and location for verification of compliance of the consignment</u> <u>timing of the activities for the verification of compliance; for example, before or after issuance of the phytosanitary certificate by the NNPO of the exporting country</u> <u>notification to the point of entry of the arrival of the consignment</u> <u>assignment of qualified staff to implement provisions under the arrangement</u> <u>financial aspects</u> <u>frequency and timing of review of the arrangement</u> <u>Criteria for downscaling or conclusion of the arrangement</u>	1. The first seven added paragraphs were moved from paragraphs 48, 51, 49, 50, 67, 71 and 72. See comment in paragraph 53. 2. Last paragraph should also be included.	Mexico, Peru

Comm no.	Para no.	Comment type	Comment	Explanation	Country
266.	61	Technical	<p><u>t</u> regulated articles</p> <p><u>the time and location for verification of compliance of the consignment</u></p> <p><u>timing of the activities for the verification of compliance: for example, before or after issuance of the phytosanitary certificate by the NPPO of the exporting country</u></p> <p><u>notification to the point of entry of the arrival of the consignment</u></p> <p><u>assignment of qualified staff to implement provisions under the arrangement</u></p> <p><u>financial aspects</u></p> <p><u>frequency and timing of reviews of the arrangement</u></p> <p><u>criteria that could result in suspension or termination of the arrangement</u></p> <p><u>Criteria for downscaling or conclusion of the arrangement</u></p>	1. The first seven added paragraphs were moved from paragraphs 48, 51, 49, 50, 67, 71 and 72. See comment in paragraph 53. 2. Last paragraph should also be included.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
267.	62	Technical	<p><u>5.2 Technical aspects</u></p> <p>regulated pests and the relevant phytosanitary measures for these pests required by the NPPO of the importing country</p>	To provide a better understanding. See comment in paragraph 54.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
268.	63	Editorial	<p>phytosanitary actions (such as:</p> <p>testing,</p>	To highlights the phytosanitary actions.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			verification of treatment and verification of consignment integrity		
269.	63	Substantive	<u>Required</u> phytosanitary actions (such as <u>sampling, inspection</u> , testing, verification of treatment and verification of consignment integrity)	There is a duplication in para 63 & 64. To streamline, the additional wordings are proposed for a combined 63 & 64 here.	APPPC, Singapore, Australia, New Zealand, Korea, Republic of, China
270.	63	Technical	phytosanitary actions (such as: <u>inspection of the consignment</u> -testing <u>procedure</u> , verification of treatment and verification of consignment integrity) <u>sampling schemes for specified commodities</u>	Last bullet added moved from paragraphs 36.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
271.	63	Technical	<u>los procedimientos fitosanitarios</u> las acciones fitosanitarias (como las pruebas, la verificación del tratamiento y la verificación de la integridad del envío);	Término más apropiado por estar dirigido a plagas reglamentadas.	Costa Rica
272.	64	Editorial	inspection and testing <u>systems</u> regimes of the NPPO of the importing country	It is more relevant technical term	NEPPO
273.	64	Substantive	inspection and testing regimes of the NPPO of the importing country <u>To move to para 63</u>	To remove duplication in para 63 & 64.	APPPC, Singapore, Australia, New Zealand, Korea, Republic of, China
274.	64	Substantive	inspection, <u>sampling</u> and testing regimes of the NPPO of the importing country	The word ",sampling" should be added after "inspection" to fulfil the compliance procedures at import (Refer to section 5.1.5.2 of ISPM 20). Sampling is an importance activity that NPPO of both exporting and importing countries need to be discussed and	Thailand

Comm no.	Para no.	Comment type	Comment	Explanation	Country
				agree on before develop the arrangement. In section 4.4: Formalization of this draft standard has already refer or mention about inspection and testing but "sampling" has not yet.	
275.	64	Technical	inspection and testing procedures regimes of the NPPO of the importing country	Procedures is a better en broader wording than regimes.	EPPO, European Union, Austria, Norway
276.	64	Technical	inspection and testing regimes of the NPPO of the importing country	Testing and inspection are already included in paragraph 63 and they should be agreed by both NPPOs rather than to refer only to NPPO of importing country.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
277.	65	Editorial	infrastructure and equipment <u>used for the verification of compliance of consignments</u>	Provides better description.	EPPO, European Union, Austria, Norway
278.	67	Technical	financial aspects	Financial aspects are not a technical requirement. This has been added to [34].	Australia
279.	67	Technical	financial aspects	Moved to paragraph 61.	Mexico, Peru
280.	67	Technical	financial aspects	Moved to paragraph 61.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
281.	68	Editorial	notification of <u>regulated</u> quarantine <u>pests</u> detection or non-compliance	to be consistent with section 17.	APPPC, Singapore, Australia, Thailand, Korea, Republic of, China
282.	68	Editorial	notification of quarantine <u>regulated</u> <u>pests</u> detection or non-compliance	To ensure consistency with para [17]	Japan
283.	68	Substantive	notification of quarantine pest detection or non-compliance	notification of quarantine pests is a case of non-compliance	COSAVE, Mexico, Argentina, Peru, Brazil, Chile, Uruguay, Paraguay
284.	68	Technical	la notificación de la detección de plagas <u>reglamentadas</u> cuarentenarias o de casos de incumplimiento <u>en el país exportador</u> ;	Para coherencia en el documento.	Costa Rica
285.	69	Substantive	corrective actions <u>on a consignment</u> following non-compliance	Proposal is to merge paragraphs 69 and 70. See explanation at paragraph 70.	EPPO, European Union, Austria, Norway

Comm no.	Para no.	Comment type	Comment	Explanation	Country
286.	70	Editorial	provisions to bilaterally consider the most least costly and acceptable risk management measures to potentially salvage a rejected consignment	Removal of bilateral as also can be multilateral. The use of 'most acceptable' risk management measures as this would cover least costly.	Australia
287.	70	Editorial	provisions to bilaterally consider the least costly most costly and acceptable risk management measures to potentially salvage a rejected consignment	deleted least costly and included most costly	PPPO
288.	70	Substantive	provisions to bilaterally consider the least costly and acceptable risk management measures to potentially salvage a rejected consignment	This is a very detailed aspect that will vary depending on the specific situations. Decisions to put consignments into compliance are up to the exporting NPPO.	EPPO, European Union, Austria, Norway
289.	71	Technical	frequency and timing of reviews of the arrangement	Moved to paragraph 61.	Mexico, Peru
290.	71	Technical	frequency and timing of reviews of the arrangement	Moved to paragraph 61.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
291.	71	Translation	la frecuencia y las fechas de las revisiones los exámenes del acuerdo;	Mejor término en español	Costa Rica
292.	72	Substantive	criteria that could result in the review, evaluation, suspension and or termination of the arrangement.	To be consistent with the criteria stated in paragraph 37: criteria that could trigger review and evaluation of the arrangement & para 38: criteria that could trigger suspension or termination of the arrangement.	Singapore
293.	72	Technical	criteria that could result in suspension or termination of the arrangement.	Moved to paragraph 61.	Mexico, Peru
294.	72	Technical	criteria that could result in suspension or termination of the arrangement.	Moved to paragraph 61.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
295.	73	Substantive	Any actions undertaken by the NPPO of the importing country in the exporting country under an arrangement are subject to and must comply with the legislation of the exporting country.	This is an important and fundamental element of the whole arrangement. Therefore it is proposed to remove this sentence to paragraph 10, where it says that an arrangement may not impact the responsibilities of the NPPO of the exporting country.	EPPO, European Union, Austria, Norway
296.	73	Substantive	Any actions undertaken by the NPPO of the importing country in the exporting country under an arrangement are subject to and must comply with the legislation of the exporting country. <u>refer to proposed re-structuring.</u>	Redundant after proposed restructuring to Section 4 & 5.	APPPC, Singapore, New Zealand, Korea, Republic of, China
297.	73	Substantive	Any actions undertaken by the NPPO of the importing country in the exporting country under an arrangement	Actions under the arrangement may also need to comply with the legislation of the importing country.	Australia

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			are subject to and must comply with the legislation of the exporting and importing countries country .		
298.	73	Substantive	Any actions undertaken by the NPPO of the importing country in the exporting country under an arrangement are subject to and must comply with the legislation of the exporting [country] add sub headings in 79,83 and 87 .	additions	Kenya
299.	73	Substantive	Any actions undertaken by the NPPO of the importing country in the exporting country under an arrangement are subject to and must comply with the legislation of the exporting country.	Moved to after paragraph 28 because this text is a requirement.	Brazil, COSAVE, Argentina, Chile, Uruguay, Paraguay
300.	74	Substantive	6. Implementation of an Arrangement	This heading is not needed. Paragraph [75] fits under development of an arrangement.	Australia
301.	75	Editorial	An arrangement may be applied to all exported consignments of a particular commodity, or to only a percentage thereof. It may be limited to a certain time period during the shipping season. <u>This paragraph moves to Development of an arrangement</u>	This paragraph moves to Development of an arrangement	Australia
302.	75	Substantive	An arrangement may be applied to all <u>or limited quantity of consignment e.g. certain time period during the shipping season.</u> exported consignments of a particular commodity, or to only a percentage thereof. It may be limited to a certain time period during the shipping season.	This is taken to refer to seasonal pests.	APPPC, Australia, Korea, Republic of, China
303.	75	Substantive	An arrangement may be <u>subjected to implementation conditions i.e. applied</u> to all exported consignments of a particular commodity, or to only a percentage thereof, categories of regulated commodities, defined time period during the shipping season etc. It may be limited to a certain time period during the shipping season.	It is not operationally feasible to apply the arrangement to only a percentage of a consignment. The sentence is rephrased to focus on the implementation conditions/criteria with examples included but this is not exhaustive list.	Singapore
304.	75	Technical	<u>The verification of compliance described in A</u> an arrangement may be applied <u>by the NPPO of the importing country</u> to all exported consignments of a particular commodity, or to only a	Better indication of who applies the arrangement.	EPPO, European Union, Austria, Norway

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			percentage thereof. It may be limited to a certain time period during the shipping season.		
305.	76	Editorial	An arrangement should aim for the lowest possible intensity of activities to be carried out by <u>[the NPPO]space between the two words</u> of the importing country.	grammatical correction	Kenya
306.	76	Editorial	An arrangement should aim for the lowest possible intensity of activities to be carried out by the NPPO of the importing country.	The space between "the NPPO" should be added.	Thailand
307.	76	Editorial	An arrangement should aim for the lowest possible intensity of activities to be carried out by the NPPO of the importing country. <u>The NPPO of the exporting country is responsible for the implementation of the agreement. The activities of the NPPO of the importing country should be limited to those specified in the agreement.</u>	To simplify.	United States of America
308.	76	Editorial	An arrangement should aim for the lowest possible intensity of activities to be carried out by the NPPO of the importing country.	Space between the and NPPO	Barbados, Jamaica, Belize, Guyana
309.	76	Editorial	An arrangement should aim for the lowest possible intensity of activities to be carried out by the NPPO of the importing country.	Editorial correction	NEPPO
310.	76	Substantive	An arrangement should aim for the lowest possible intensity of activities to be carried out by the NPPO of the importing country.	Since this arrangement is voluntary to fac trade & can be resourced, it is not relevant to consider the lowest possible intensity.	APPPC, Singapore, Korea, Republic of, China
311.	76	Substantive	An arrangement should aim for the lowest possible intensity of activities to be carried out by the NPPO of the importing country.	If an arrangement is voluntary, facilitates trade and can be resourced, it is not relevant that the arrangement be of the lowest possible intensity of activities carried out by the NPPO of the importing country.	Australia
312.	77	Translation	7. <u>Revisión</u>Examen de un acuerdo	Mejor término en español	Costa Rica
313.	78	Editorial	The effectiveness of an arrangement should be reviewed regularly to identify problems and allow their discussion and resolution in order to improve the arrangement or to determine if it could be terminated during a given time period . The frequency and timing of reviews should be described in the arrangement. Some elements of the arrangement may need to be reviewed	Unnecessary wording	EPPO, European Union, Austria, Norway

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			more frequently than others.		
314.	78	Editorial	The effectiveness <u>compliance with the terms</u> of an arrangement should be reviewed regularly to identify problems and allow their discussion and resolution in order to improve the arrangement or to determine if it could be terminated during a given time period. The frequency and timing of reviews should be described in the arrangement. Some elements of the arrangement may need to be reviewed more frequently than others.	More appropriate wording	United States of America
315.	78	Substantive	<p>The effectiveness of an arrangement should be reviewed regularly to identify problems and allow their discussion and resolution in order to improve the arrangement or to determine if it could be terminated during a given time period. The frequency and timing of reviews should be described in the arrangement. Some elements of the arrangement may need to be reviewed more frequently than others.</p> <p><u>Revision of existing arrangements requires the agreement of the NPPOs of importing and exporting countries.</u></p>	See comments on paragraph 41. This concept fits better under paragraph 78 than 41.	EPPO, European Union, Austria, Norway
316.	78	Substantive	<p>The effectiveness of an arrangement should be reviewed regularly to identify problems and allow their discussion and resolution in order to improve the arrangement or to determine if it could be terminated during a given time period. The frequency and timing of reviews should be described in the arrangement. <u>The frequency and timing of reviews should be described in the arrangement.</u> Some elements of the arrangement may need to be reviewed more frequently than others.</p>	To simplify the paragraph.	APPPC, Singapore, Australia, New Zealand, Korea, Republic of, China
317.	78	Substantive	<p>The effectiveness of an arrangement should be reviewed regularly to identify problems and allow their discussion and resolution in order to improve the arrangement, <u>if necessary</u> or to determine if it could be</p>	To simplify and ensure the flexibility of review.	Japan

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			terminated during a given time period. The frequency and timing of reviews should be described in the arrangement. Some elements of the arrangement may need to be reviewed more frequently than others.		
318.	78	Technical	The effectiveness of an arrangement should be reviewed regularly to identify problems and allow their discussion and resolution in order to improve the arrangement or to determine if it could be terminated during a given time period. The frequency and timing of reviews should be described in the arrangement. Some elements of the arrangement may need to be reviewed more frequently than others.	Removed senetnces that we fill is not relevant	PPPO
319.	79	Substantive	8. Suspension or Termination of an Arrangement	Paragraphs [79]-[82] are not consistent with the current concept of verification of compliance in the exporting country because to stil seem to based of the concept of pre-clearance as a response to numerous cases of interceptions of regulated pests. This is not the basis of this annex and therefore these paragraphs are not appropriate.	EPPO, European Union, Austria, Norway
320.	80	Editorial	An arrangement may be suspended or terminated for repeated instances of non-compliance resulting in high levels of interception of regulated quarantine pests in the exporting country or in the importing country.	Appropriate IPPC terminology.	Australia
321.	80	Editorial	An arrangement may be suspended or terminated for repeated instances of non-compliance resulting in high levels of interception of quarantine regulated pests in the exporting country or in the importing country.	To ensure consistency with paragraph [17]	Japan
322.	80	Substantive	An arrangement may be suspended or terminated for repeated instances of non-compliance resulting in high levels of interception of quarantine pests in the exporting country or in the importing country.	See explanation given in paragraph [79]	EPPO, European Union, Austria, Norway
323.	80	Substantive	An arrangement may be suspended or terminated for repeated instances of non-compliance such as resulting in high levels of interception of quarantine pests in the exporting country or in by the importing country.	High levels of interception of quarantine pests is just an example of repeated instances of non-compliance. The following paragraph 81 touched upon agreed specific conditions for suspension or termination to be described in the arrangement.	Singapore
324.	80	Substantive	An arrangement may be suspended or terminated for repeated instances of non-compliance resulting in high levels of interception of quarantine pests in the exporting country or in the importing country.	It is misleading to suggest an arrangement should be suspended or terminated due to the detection of a high number of quarantine pests as the offshore verification is not a phytosanitary measure. If non-compliance is occuring due to a high number of quarantine pests then this is a larger issue with	Australia

Comm no.	Para no.	Comment type	Comment	Explanation	Country
				the import pathway and reason to consider the need for audit , PRA review and suspension of trade during this time in serious instances.	
325.	80	Substantive	An arrangement may be suspended or terminated for repeated instances of non-compliance resulting in high levels of interception of quarantine pests in the exporting country or in the importing country.	The term non-compliance is related to imported consignments and thus not related to the exporting country.	COSAVE, Mexico, Argentina, Peru, Chile, Uruguay, Paraguay
326.	80	Substantive	An arrangement may be <u>modified</u> , suspended or terminated for repeated instances of non-compliance resulting in high levels of interception of quarantine pests in the exporting country or in the importing country.	1.The arrangement may also be modified in this case. 2. Confusing text because the term non-compliance is related to imported consignments and thus not related to exporting country.	Brazil
327.	80	Technical	Un acuerdo podrá ser suspendido o rescindido por la reiteración de casos de incumplimiento que ocasionen numerosas intercepciones de plagas <u>reglamentadas cuarentonarias</u> en el país exportador o en el país importador.	Coherencia con el párrado 68	Costa Rica
328.	81	Substantive	Specific conditions that can result in an arrangement's suspension or termination should be agreed on and described in the arrangement.	See the explanation given in paragraph [79]	EPPO, European Union, Austria, Norway
329.	81	Substantive	Specific conditions that can result in an arrangement's suspension or termination should be agreed on and described in the arrangement.	Normally, non compliances would be dealt with by the same procedures as noncompliances in importing country. However, specific conditions that can result in an arrangement's suspension or termination should be agreed on and described in the arrangement.	China
330.	81	Substantive	Specific conditions that can result in an arrangement's suspension or termination <u>for repeated instances of non-compliance</u> should be agreed on and described in the arrangement.	For more clarity of the reason for suspension or termination of an arrangement.	Japan
331.	82	Editorial	Where an arrangement has been previously terminated, NPPOs of importing and exporting countries may engage in discussions to resolve issues and reinstate the a revised arrangement or develop an alternative approach. A corrective action plan may be agreed to bilaterally.	Reword to make clear	Australia
332.	82	Editorial	Where an arrangement has been previously terminated[<u>repalce with suspended</u>], NPPOs of importing and exporting countries may engage in discussions to	simplification of sentence structure	Kenya

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			resolve issues and reinstate a revised arrangement or develop an alternative approach. A corrective action plan may be agreed to bilaterally.		
333.	82	Substantive	Where an arrangement has been previously terminated, NPPOs of importing and exporting countries may engage in discussions to resolve issues and reinstate a revised arrangement or develop an alternative approach. A corrective action plan may be agreed to bilaterally.	See the explanation given in paragraph [79]	EPPO, European Union, Austria, Norway
334.	82	Substantive	Where an arrangement has been previously terminated, NPPOs of importing and exporting countries may engage in discussions to resolve issues and reinstate the a revised arrangement or develop an alternative approach. A corrective action plan may be agreed to bilaterally.	To simplify the paragraph. Last sentence redundant as this is not a PS measure.	APPPC, Singapore, New Zealand, Korea, Republic of, China
335.	82	Substantive	Where an arrangement has been previously terminated, NPPOs of importing and exporting countries may engage in discussions to resolve issues and reinstate a revised arrangement or develop an alternative approach. A corrective action plan may be agreed to bilaterally.	This arrangement is a trade facilitation measure and not a phytosanitary measure, so you would not have a corrective action plan for the arrangement. If there were issues with the import pathway due to non compliance with the detection of regulated pests, you would look at audit (then corrective actions) or review of the import pathway with a PRA.	Australia
336.	82	Technical	Where an arrangement has been previously terminated, NPPOs of importing and exporting countries may engage in discussions to resolve issues and reinstate a revised the arrangement or develop an alternative approach. A corrective action plan may be agreed to bilaterally.	Removed a revised	PPPO
337.	83	Editorial	9. Downscaling or Closing Conclusion of an Arrangement	For clarity	United States of America
338.	83	Editorial	9. Downscaling or Conclusion of an Arrangement	Removed Downscaling or	PPPO
339.	83	Substantive	9. Downscaling or Conclusion of an Arrangement	This section is about conclusion of an arrangement not downscaling an arrangement. As stated in paragraph [84] this section is for when an arrangement is no longer needed.	Australia
340.	83	Substantive	9. Downscaling or Conclusion of an Arrangement	To clarify	Korea, Republic of

Comm no.	Para no.	Comment type	Comment	Explanation	Country
341.	83	Substantive	9. Downscaling or Conclusion of an Arrangement	It's more reasonable.	China
342.	83	Technical	9. Termination Downscaling or Conclusion of an Arrangement	The phrase "conclusion of agreement" can be misinterpreted. It should be clarified that termination in this case means termination of the arrangement, leading to other procedures for import inspections and not to termination of trade. Downscaling can be deleted since this is not appropriate in the current understanding of the concept of verification.	EPPO, European Union, Austria, Norway
343.	83	Translation	9. Downscaling or Conclusion of an Arrangement	"downscaling" should be translated into Spanish as "reducción de la intensidad de las actividades"	Mexico, Peru
344.	83	Translation	9. Downscaling or Conclusion of an Arrangement	The term "conclusion" should be translated into Spanish as "finalización" and the term "downscaling" should be translated into Spanish as "reducción de la intensidad de las actividades"	COSAVE, Argentina, Chile, Uruguay, Paraguay
345.	83	Translation	9. Downscaling or Conclusion of an Arrangement	The term "conclusion" should be translated into Spanish as "finalización".	Brazil
346.	83	Translation	9. Reducción de la escala de <u>la intensidad de las actividades</u> aplicación o conclusión de un acuerdo	Mejorar comprensión en español	Costa Rica
347.	84	Editorial	If the reasons for establishing an arrangement are no longer valid (e.g. because of changes in trade logistics between the two countries) or if the arrangement is no longer needed, the arrangement should be scaled down (and eventually concluded).	There is a space missing between 'needed' and 'the'; a comma is added for clarity	EPPO, European Union, Austria, Norway
348.	84	Editorial	If the reasons for establishing an arrangement are no longer valid (e.g. because of changes in trade logistics between the two countries) or if the arrangement is no longer needed, the arrangement should be scaled down (and eventually concluded).	Addition of spacing and comma for clarity.	Singapore
349.	84	Editorial	If the reasons for establishing an arrangement are no longer valid (e.g. because of changes in trade logistics between the two countries) or if the arrangement is no longer needed, the arrangement should be scaled down (and eventually concluded).	space	Australia
350.	84	Editorial	If the reasons for establishing an arrangement are no longer valid (e.g. because of changes in trade logistics between the two countries) or if the arrangement is no longer needed, the <u>[put space]</u> arrangement should be scaled down (and eventually concluded).	grammatical correction	Kenya

Comm no.	Para no.	Comment type	Comment	Explanation	Country
351.	84	Editorial	If the reasons for establishing an arrangement are no longer valid (e.g. because of changes in trade logistics between the two countries) or if the arrangement is no longer needed the arrangement should be scaled down (and eventually concluded).	The space between "needed the" should be added.	Thailand
352.	84	Editorial	If the reasons for establishing an arrangement are no longer valid (e.g. because of changes in trade logistics between the two countries) or if the arrangement is no longer needed, the arrangement should be phased out scaled down (and eventually closed concluded).	Suggest more appropriate wording – scale back may not be easily understood for some non-native English speakers. Suggest phase out as an alternative.	United States of America
353.	84	Editorial	If the reasons for establishing an arrangement are no longer valid (e.g. because of changes in trade logistics between the two countries) or if the arrangement is no longer needed the arrangement should be scaled down (and eventually concluded).	Space between needed and this.	Barbados, Jamaica, Belize, Guyana
354.	84	Editorial	If the reasons for establishing an arrangement are no longer valid (e.g. because of changes in trade logistics between the two countries) or if the arrangement is no longer needed, the arrangement should be scaled down (and eventually concluded).	Editorial correction	NEPPO
355.	84	Editorial	<u>The downscaling or conclusion of an arrangement may be based on the successful completion of a number of consignments or shipping seasons. This applies especially if the arrangement was established to facilitate the movement of a new commodity or a commodity with which problems occurred in the past.</u> If the reasons for establishing an arrangement are no longer valid (e.g. because of changes in trade logistics between the two countries) or if the arrangement is no longer needed the arrangement should be scaled down (and eventually concluded).	Moved from paragraph 86 for better reading	COSAVE, Mexico, Argentina, Peru, Brazil, Chile, Uruguay, Paraguay
356.	84	Substantive	If the reasons for establishing an arrangement are no longer valid (e.g. because of changes in trade logistics between the two countries) or if the arrangement is no longer needed the arrangement should be scaled down (and eventually concluded) terminated .	Use of "scaling down" is not appropriate in this understanding of the concept of verification of compliance. It refers to the former concept of pre-clearance as an arrangement that was developed because of numerous interceptions of regulated pests. Concluded should be replaced with terminated to clarify the	EPPO, Austria, Norway

Comm no.	Para no.	Comment type	Comment	Explanation	Country
				terminology.	
357.	84	Substantive	If the reasons for establishing an arrangement are no longer valid (e.g. because of changes in trade logistics between the two countries) or if the arrangement is no longer needed the arrangement should be scaled down (and eventually concluded) terminated . <u>However, the arrangement may be terminated at any time by either of the countries involved.</u>	Use of "scaling down" is not appropriate in this understanding of the concept of verification of compliance. It refers to the former concept of pre-clearance as an arrangement that was developed because of numerous interceptions of regulated pests. Concluded should be replaced with terminated to clarify the terminology. Additional sentence added for clarity.	European Union
358.	84	Substantive	If the reasons for establishing an arrangement are no longer valid (e.g. because of changes in trade logistics between the two countries) or if the arrangement is no longer needed the arrangement should be scaled down (and eventually concluded) .	If an arrangement was no longer needed you would not scale down activity, you would concluded activity. Otherwise this could be a potential restriction to trade.	Australia
359.	84	Substantive	If the reasons for establishing an arrangement are no longer valid (e.g. because of changes in trade logistics between the two countries) or if the arrangement is no longer needed the arrangement should be scaled down (and eventually concluded) <u>concluded</u> .	It's more clarity.	China
360.	84	Technical	If the reasons for establishing an arrangement are no longer valid (e.g. because of changes in trade logistics between the two countries) or if the arrangement is no longer needed the arrangement should be scaled down (and eventually concluded) .	brackets deleted to highlight that if arrangement is no needed will be finally concluded.	COSAVE, Mexico, Argentina, Peru, Brazil, Chile, Uruguay, Paraguay
361.	84	Translation	If the reasons for establishing an arrangement are no longer valid (e.g. because of changes in trade logistics between the two countries) or if the arrangement is no longer needed the arrangement should be scaled down (and eventually concluded).	"eventually" should be translated into Spanish as "finalmente"; "should be scaled down" should be translated into Spanish as "deberían reducirse sus actividades"	COSAVE, Mexico, Argentina, Peru, Brazil, Chile, Uruguay, Paraguay
362.	85	Editorial	An arrangement should be concluded when it is no longer technically justified, necessary or appropriate; (e.g. for example, when the NPPO of the exporting country has shown that it meets the phytosanitary import requirements of the NPPO of the importing country).	For consistency with other ISPMs, it should be clear that this is an example. Even if they meet all the requirements, it may be more economical to do pre-clearance at origin. This is more appropriate as an example of the situation when the agreement could be closed.	United States of America
363.	85	Editorial	An arrangement should be concluded when it is no longer technically justified, necessary or appropriate; for example, when the NPPO of the exporting country has shown that it meets the phytosanitary import	This paragraph is redundant with para [84]	Japan

Comm no.	Para no.	Comment type	Comment	Explanation	Country
364.	85	Substantive	requirements of the NPPO of the importing country. An arrangement should be concluded when it is no longer technically justified, necessary or appropriate; for example, when the NPPO of the exporting country has shown that it meets the phytosanitary import requirements of the NPPO of the importing country.	See the explanation provided in paragraph 84.	EPPO, European Union, Austria, Norway
365.	85	Substantive	An arrangement should be concluded when it is no longer technically justified, necessary or appropriate; for example, when the NPPO of the exporting country has shown that it meets the phytosanitary import requirements of the NPPO of the importing country.	Redundant.	APPPC, New Zealand, Korea, Republic of, China
366.	85	Substantive	An arrangement should be concluded when it is no longer technically justified, necessary, or appropriate, <u>or when both parties do not see any benefit in continuing with the arrangement.</u> ; for example, when the NPPO of the exporting country has shown that it meets the phytosanitary import requirements of the NPPO of the importing country.	NPPOs can choose to continue with the arrangement even if the NPPO of the exporting country can meet the phytosanitary import requirements of the importing country.	Singapore
367.	85	Substantive	An arrangement should be concluded when it is no longer technically justified , necessary or appropriate; for example, when the <u>arrangement is no longer beneficial for the</u> NPPO of the exporting country <u>or the</u> has shown that it meets the phytosanitary import requirements of the NPPO of the importing country.	Offshore verification of compliance is not a phytosanitary measure and does not need to be technically justified. As Offshore verification is not a phytosanitary measure, meeting phytosanitary import requirements would not be a reason for concluding the arrangement. This arrangement would be concluded when it is no longer beneficial for the importing country or the exporting country.	Australia
368.	85	Substantive	An arrangement should be concluded when it is no longer technically justified, necessary or appropriate; for example, when the NPPO of the exporting country has shown that it meets the phytosanitary import requirements of the NPPO of the importing country.	It is not a good example. Arrangements are not used to demonstrate that NPPO of exporting country meets phytosanitary requirements of importing country.	Brazil
369.	85	Technical	An arrangement should be concluded when it is no longer <u>facilitate trade</u> technically justified, necessary or appropriate; for example, when the NPPO of the exporting country has shown that it meets the phytosanitary import requirements of the NPPO of the importing country.	inserted the word when it no longer facilitate trade	PPPO
370.	85	Technical	An arrangement should be concluded when it is no longer technically justified, necessary or appropriate; for example, when the NPPO of the exporting country has	This information is already included in paragraph 84. Moreover and regarding the example, the aim of arrangements are not to demostsrate that NPPO of exporting country meets	COSAVE, Mexico, Argentina, Peru, Chile,

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			shown that it meets the phytosanitary import requirements of the NPPO of the importing country.	phytosanitary requirements of importing country.	Uruguay, Paraguay
371.	85	Technical	An arrangement should be concluded when it is no longer technically <u>or operationally</u> justified, necessary or appropriate; for example, when the NPPO of the exporting country has shown that it meets the phytosanitary import requirements of the NPPO of the importing country.	Term added because it may be another reason to conclude an arrangement.	Brazil
372.	86	Editorial	The downscaling <u>phasing out</u> or conclusion <u>closing</u> of an arrangement should <u>may</u> be based on the successful completion of a number of consignments <u>reasons specified in the agreement, such as a certain quantity of consignments</u> or shipping seasons <u>without pest interceptions</u> . This applies especially if the arrangement was established to facilitate the movement of a new commodity or a commodity with which problems occurred in the past.	For clarity	United States of America
373.	86	Editorial	The downscaling or conclusion of an arrangement may be based on the successful completion of a number of consignments or shipping seasons. This applies especially if the arrangement was established to facilitate the movement of a new commodity or a commodity with which problems occurred in the past.	Moved to before paragraph 84	COSAVE, Mexico, Argentina, Peru, Brazil, Chile, Uruguay, Paraguay
374.	86	Substantive	The downscaling or conclusion of an arrangement may be based on the successful completion of a number of consignments or shipping seasons. This applies especially if the arrangement was established to facilitate the movement of a new commodity or a commodity with which problems occurred in the past.	See the comment in paragraph 84. The message in this paragraph contradicts the purpose stated in para 6 of the annex that this arrangement should 'facilitate trade logistics'.	EPPO, European Union, Austria, Norway
375.	86	Substantive	The downscaling or conclusion of an arrangement may be based on the successful completion of a number of consignments or shipping seasons <u>that have met the importing countries phytosanitary import requirements</u> . This applies especially if the arrangement was established to facilitate the movement of a new commodity or a commodity with which problems occurred in the past.	If the arrangement was no longer considered necessary by the NPPO of the importing or exporting countries it would not be downscaled, just concluded.	Australia

Comm no.	Para no.	Comment type	Comment	Explanation	Country
376.	86	Substantive	The downscaling or conclusion of an arrangement may be based on the successful completion of a number of consignments or shipping seasons <u>if the facilitation process is no longer needed.</u> This applies especially if the arrangement was established to facilitate the movement of a new commodity or a commodity with which problems occurred in the past.	It has to be clear that the arrangement is not a phytosanitary measure but is a trade facilitation process.	New Zealand
377.	86	Substantive	The downscaling or conclusion of an arrangement may be based on the successful completion of a number of consignments or shipping seasons <u>that have meet the phytosanitary requirements of importing country.</u> This applies especially if the arrangement was established to facilitate the movement of a new commodity or a commodity with which problems occurred in the past.	Redundant, and to clarify	Korea, Republic of
378.	86	Substantive	The downscaling or conclusion of an arrangement may be based on the successful completion of a number of consignments or shipping seasons <u>that have meet the phytosanitary requirements of importing country.</u> This applies especially if the arrangement was established to facilitate the movement of a new commodity or a commodity with which problems occurred in the past.	It's more reasonable.	China
379.	86	Substantive	La reducción de la escala o conclusión de un acuerdo podrá basarse en la realización satisfactoria de cierto número de envíos o temporadas de envíos. Esto es especialmente pertinente si el acuerdo se estableció para facilitar la circulación de un producto nuevo o de un producto que hubiera planteado problemas en el pasado. <u>A la conclusión de un acuerdo, deberían restablecerse los procedimientos normales de inspección de los envíos importados</u>	Viene del párrafo 88 que se eliminó	Costa Rica
380.	86	Technical	The downscaling or conclusion of an arrangement may be based on the successful completion of a number of consignments or shipping seasons <u>that have met the importing country phytosanitary requirements.</u> This applies especially if the arrangement was established to facilitate the movement	removed downscaling and the last sentence. Inserted a line in the first sentence to make it complete	PPPO

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			of a new commodity or a commodity with which problems occurred in the past.		
381.	86	Translation	La reducción de la <u>intensidad de las actividades</u> escale o conclusión de un acuerdo podrá basarse en la realización satisfactoria de cierto número de envíos o temporadas de envíos. Esto es especialmente pertinente si el acuerdo se estableció para facilitar la circulación de un producto nuevo o de un producto que hubiera planteado problemas en el pasado.	Mejor comprensión en español	Costa Rica
382.	87	Editorial	10. Replacement of an Arrangement	This heading is confusing and not necessary. Paragraph [88] fits appropriately under 9. Conclusion of an arrangement	Australia
383.	87	Editorial	10. Replacement of an Arrangement	Removed Replacement of an arrangement completely	PPPO
384.	87	Substantive	10. Replacement of an Arrangement	Title is superfluous given the proposed changes in paragraphs 84, 85 and 86.	EPPO, European Union, Austria, Norway
385.	87	Substantive	10. Replacement of an Arrangement	Redundant	Korea, Republic of
386.	87	Substantive	10. Replacement of an Arrangement	It's removed.	China
387.	87	Substantive	10. Replacement of an Arrangement	Text under this section does not refer to the replacement of an arrangement but to the conclusion.	COSAVE, Mexico, Argentina, Peru, Brazil, Chile, Uruguay, Paraguay
388.	87	Substantive	10. Sustitución de un acuerdo	Se eliminó por innecesario el apartado	Costa Rica
389.	87	Technical	10. Replacement of an Arrangement	Please clarify the meaning of "replacement of an arrangement".	United States of America
390.	88	Substantive	Once an arrangement has ended concluded, the performance normal inspection of verification procedures <u>in the importing country</u> for imported consignments should be continued should be reinstated in the importing country.	To clarify the situation that, if an arrangement for verification of compliance in the country of export has ended, verification procedures for imported countries should be continued to take place in the country of import.	EPPO, Austria, Norway
391.	88	Substantive	Once an arrangement has ended concluded, the performance normal inspection of verification procedures <u>in the importing co</u>	To clarify the situation that, if an arrangement for verification of compliance in the country of export has ended, verification procedures for imported consignments should be continued, or	European Union

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			untry for imported consignments should be <u>continued or reinstated in the importing country.</u>	reinstated, to take place in the country of import.	
392.	88	Substantive	Once an arrangement has concluded, normal inspection procedures for imported consignments should be reinstated in the importing country.	Redundant	Korea, Republic of
393.	88	Substantive	A la conclusión de un acuerdo, deberían restablecerse en el país importador los procedimientos normales de inspección de los envíos importados.	Se trasladó al final del párrafo 86 por tratarse de lo mismo	Costa Rica
394.	88	Technical	Once an arrangement has concluded closed, the NPPO of the importing country should follow established inspection protocols for imported consignments, normal inspection procedures for imported consignments should be reinstated in the importing country.	What is “normal”? Suggest to rephrase for clarity.	United States of America