



2012-009: Draft Annex to ISPM 28 - Irradiation treatment for *Ostrinia nubilalis*

Com m. no.	Par a. no.	Comment type	Comment	Explanation	Country	SC response
1.	G	Substantive	I support the document as it is and I have no comments		Singapore, Lao People's Democratic Republic, China, Canada, Thailand, Nepal, Barbados, Ghana, Belize	Considered Support for draft annex noted
2.	G	Technical		The value of ED is described at 99.9918 in this draft. But according to the references mentioned in this draft, the number of pests used in the test is insufficient. It is necessary to add appropriate references in the draft.	Korea, Republic of, NEPPO	Modified. At the recommended irradiation dose of 289Gy the level of treatment efficacy is lower than 99.9914. The correct treatment efficacy for 289Gy or above will be listed as 99.987 based on 23,765 treated pupae. However, data presented in Hallman & Hellmich (2009) does support a treatment of 343Gy at

						99.9914 efficacy. Draft annex revised to include two treatment schedules.
3.	1	Editorial	Draft Annex to ISPM 28:2007: Irradiation treatment for <i>Ostrinia nubilalis</i> IRRADIATION TREATMENT FOR OSTRINIA NUBILALIS (2012-009)	Title not in capitals.	EPPO, European Union, Georgia, Serbia	Considered. The IPPC Secretariat will apply the appropriate style before publishing.
4.	1	Editorial	Draft Annex to ISPM 28:2007: IRRADIATION TREATMENT FOR OSTRINIA NUBILALIS (2012-009)	Edit - should be lower cased where appropriate.	United States of America, Mexico	Considered. The IPPC Secretariat will apply the appropriate style before publishing.
5.	1	Translation	Draft Annex to ISPM 28:2007: IRRADIATION TREATMENT FOR OSTRINIA NUBILALIS (2012-009)	"IRRADIATION TREATMENT FOR OSTRINIA NUBILALIS" should be translated into Spanish as "TRATAMIENTO CON IRRADIACIÓN CONTRA OSTRINIA NUBILALIS"	OIRSA	Incorporated. Draft annex (Spanish) revised according to comment to account for translation.
6.	4	Editorial	This treatment comprises the irradiation of fruits and vegetables at a minimum absorbed dose of 289 Gy to prevent F ₁ development past first instar in eggs through late pupae of <i>Ostrinia nubilalis</i> (European corn borer) ¹ .	Edit. The Secretariat should ensure that all treatments not include the common name because common names are varied across regions and across languages. In addition, common names have not been included in adopted standards.	United States of America	Incorporated. Draft annex revised and common name removed from the text.

7.	4	Substantive	This treatment comprises the irradiation of fruits and vegetables at a minimum absorbed dose of 343 289 Gy to prevent F ₁ development beyond past first instar derived from irradiated in eggs through late parent pupae of <i>Ostrinia nubilalis</i> (European corn borer) ¹ .	It is recommended the TPPT consider in consultation with the submitting country, a dose of 343Gy to prevent egg hatch. While the proposed dose meets ISPM 18 criteria, the slightly higher dose should not be considered trade restrictive and results in a more readily verified treatment success. This would be more facilitating to trade.	Australia	Modified. At the recommended irradiation dose of 289Gy the level of treatment efficacy is lower than 99.9914. The correct treatment efficacy for 289Gy or above will be listed as 99.987 based on 23,765 treated pupae. However, data presented in Hallman & Hellmich (2009) does support a treatment of 343Gy at 99.9914 efficacy. Draft annex revised at paragraph 7 to include second treatment option and revised text.
8.	4	Technical	This treatment comprises the irradiation of fruits and vegetables at a minimum absorbed dose of 289 Gy to prevent F ₁ development past first instar in eggs through late pupae of <i>Ostrinia nubilalis</i> (European corn borer) ¹ .	Wording of paragraph 4 should be revised because it is not clear. According to Spanish version this treatment comprises the irradiation of fruits and vegetables at a minimum absorbed dose of 289 Gy to attack eggs, larvae and pupae of <i>Ostrinia nubilalis</i> (European corn borer) to prevent F ₁ development beyond initial stages. If this is revised paragraph 12 should also be clarified	COSAVE, Uruguay, Chile, Brazil, Peru, Argentina	Incorporated. Draft annex (Spanish) revised according to comment to account for translation

9.	4	Translation	This treatment comprises the irradiation of fruits and vegetables at a minimum absorbed dose of 289 Gy to prevent F ₁ development past first instar in eggs through late pupae of <i>Ostrinia nubilalis</i> (European corn borer) ¹ .	"This treatment comprises the irradiation of fruits and vegetables at a minimum absorbed dose of 289 Gy to prevent F ₁ development past first instar in eggs through late pupae of <i>Ostrinia nubilalis</i> (European corn borer)." should be translated into Spanish as "Este tratamiento consiste en la irradiación de frutas y hortalizas con una dosis mínima absorbida de 289 Gy para prevenir el desarrollo de la F ₁ más allá de los estados de vida iniciales desde el primer estado de huevo hasta el último estado de pupa de <i>Ostrinia nubilalis</i> (barrenador europeo del maíz)."	OIRSA	Incorporated. Draft annex (Spanish) revised according to comment
10.	6	Translation	Name of treatment Irradiation treatment for <i>Ostrinia nubilalis</i>	"Irradiation treatment for <i>Ostrinia nubilalis</i> " should be translated into Spanish as "Tratamiento con irradiación contra <i>Ostrinia nubilalis</i> "	OIRSA	Incorporated. Draft annex (Spanish) revised according to comment to account for translation
11.	9	Editorial	Target pest <i>Ostrinia nubilalis</i> (Hübner) (Lepidoptera: Crambidae) (European corn borer)	Common name already given in paragraph [4].	EPPO, European Union, Georgia, Serbia	Incorporated. Draft annex revised and common name removed from the text.
12.	9	Editorial	Target pest <i>Ostrinia nubilalis</i> (Hübner) (Lepidoptera: Crambidae) (European corn borer)	Edit	United States of America	Incorporated. Draft annex revised and common name removed from the text.
13.	12	Technical	Minimum absorbed dose of 289 Gy to prevent F ₁ development past first instar in eggs through late pupae of <i>O. nubilalis</i> .	"Scope of the treatment - This treatment comprises the irradiation of fruits and vegetables at a minimum absorbed dose of 289 Gy to prevent F ₁ development past first instar in eggs through late pupae of <i>Ostrinia nubilalis</i> (European corn borer) ¹ ."	COSAVE, Uruguay, Chile, Brazil, Peru, Argentina	Modified. At the recommended irradiation dose of

				However the scientific paper mentions a variation from 233 to 343 Gy. What is the tehchnical justification for this dose?		289Gy the level of treatment efficacy is lower than 99.9918. However, the data presented in Hallman & Hellmich (2009) does support a treatment of 343Gy at 99.9914 efficacy. Draft annex revised at paragraph 1 and 7 to include second treatment option.
14.	13	Editorial	The efficacy is effective dose (ED) _{99.9918} at the 95% confidence level.	For better understanding	OIRSA	Considered. Effective dose wording revised as agreed by the TPPT. Semi colon no longer relevant.
15.	13	Translation	The efficacy is effective dose (ED) _{99.9918} at the 95% confidence level.	"The efficacy is effective dose (ED) _{99.9918} at the 95% confidence level." should be translated into Spanish as "La eficacia es: dosis efectiva (DE) _{99.9918} a un nivel de confianza de 95%."	OIRSA	Incorporated. Draft annex (Spanish) revised according to comment to account for translation
16.	15	Editorial	This irradiation treatment should not be applied to fruits and vegetables stored in modified atmospheres because it may affect the treatment efficacy .	For clarification	United States of America	Incorporated. Suggested text included in paragraph 12 of draft annex.

17.	17	Substantive	Because irradiation may not result in outright mortality, inspectors may encounter live, but non-viable, <i>O. nubilalis</i> (larvae, pupae or adults) during the inspection process. This does not imply a failure of the treatment.	It would be difficult to distinguish contaminant adults from those emerged from treated pupae.	Australia	Considered. Paragraph 11 of the draft annex discusses this issue. It is recognized that the irradiation schedules do not cause mortality.
18.	18	Editorial	In evaluating this treatment the Technical Panel on Phytosanitary Treatments (TPPT) considered issues associated with the possibility of the survival of sufficient numbers of sterile adults that would escape from irradiated infested fruits and vegetables produce and fly into exotic pest traps, thereby causing financial loss and trade restrictions. The TPPT considered that, based on the work described in Hallman and Hellmich (2009) and Hallman <i>et al.</i> (2010), numbers of fit survivors would be negligible and would not pose quarantine concerns.	More precise and consistent with other adopted irradiation treatments.	EPPO, European Union, Georgia, Serbia	Incorporated. Suggested text included in relevant paragraph of draft annex.
19.	18	Substantive	In evaluating this treatment the Technical Panel on Phytosanitary Treatments (TPPT) considered issues associated with the possibility of the survival of sufficient numbers of sterile adults that could would escape from irradiated infested produce and fly into exotic pest monitoring traps, thereby triggering a quarantine response possibly causing financial loss and trade restrictions. The TPPT considered that, based on the work described in Hallman and Hellmich (2009) and Hallman <i>et al.</i> (2010), the numbers of physically capable fit survivors would be sufficiently low to make this an unlikely event. negligible and would not pose quarantine concerns.	It is not the role of the TPPT to make a judgement as to whether the presence of a live pest of quarantine concern, though sterile, poses an unacceptable level of risk to an importing country. This judgement is a sovereign right of the importing country under the SPS Agreement and IPPC. It is recognised that consistent with the levels of treatment efficacy described in ISPM:18 that sterile adults pose no reproductive risk in the importing country and that based on the TPPT's assessment of the data presented that the incidence of physically capable would be at low levels. However, the assessment as to whether this is an acceptable level of risk to an importing country should be left to that importing country. The TPPT should be commended for recognising the potential for consequences from live adults and for making a clear assessment as to the likelihood of this occurring on a commercial pathway.	Australia	Incorporated. Suggested text included in paragraph 14 of draft annex.

20.	18	Technical	<p>In evaluating this treatment the Technical Panel on Phytosanitary Treatments (TPPT) considered issues associated with the possibility of the survival of sufficient numbers of sterile adults that would escape from irradiated infested produce and fly into quarantineexotic pest traps, thereby causing economicfinancial loss and trade restrictions. The TPPT considered that, based on the work described in Hallman and Hellmich (2009) and Hallman <i>et al.</i> (2010), numbers of fit survivors would be negligible and would not pose quarantine concerns.</p>	Appropriate terms	OIRSA	<p>Incorporated.</p> <p>The trapping network that detects a new incursion may not be specifically a quarantine monitoring system. The detection of a quarantine pest by any means could trigger a quarantine response.</p> <p>Financial changed to economic; consistent with the definition of a quarantine pest.</p>
21.	18	Translation	<p>In evaluating this treatment the Technical Panel on Phytosanitary Treatments (TPPT) considered issues associated with the possibility of the survival of sufficient numbers of sterile adults that would escape from irradiated infested produce and fly into exotic pest traps, thereby causing financial loss and trade restrictions. The TPPT considered that, based on the work described in Hallman and Hellmich (2009) and Hallman <i>et al.</i> (2010), numbers of fit survivors would be negligible and would not pose quarantine concerns.</p>	"negligible" should be translated into Spanish as "insignificante" and "concerns" as "preocupaciones"	OIRSA	<p>Incorporated.</p> <p>Draft annex (Spanish) revised according to comment to account for translation; noting revised text from other countries (comments 18-20).</p>