



Para	Text	ReconciliationReport_Comment
G	(General Comment)	<i>Category : TECHNICAL</i> <b>(173) Venezuela (1 Oct 2016 3:01 AM)</b> El grupo de Venezuela no tiene comentarios por ahora
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(163) Canada (30 Sep 2016 8:49 PM)</b> Canada supports the draft ISPM on international movement of growing media in association with plants for planting.  Editorial, technical and substantive comments are provided
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(162) Guyana (30 Sep 2016 6:44 PM)</b> We accept the contents of the document.
G	(General Comment)	<i>Category : EDITORIAL</i> <b>(161) Nepal (30 Sep 2016 3:44 PM)</b> 1. In background paragraphs, soil is considered to be the high risk pathway for the introduction and spread of quarantine pests. So soil is prohibited in all countries though the draft states 'often prohibited'. Is there any country which does not prohibit soil and under what provisions? If so, that can be given as examples/evidences and will be useful for recommendation in this document. 2. In the Annex 1, 'Soil' is commented as – 'Risk can be reduced if treated'. It means the present draft is considering 'soil' for movement as a growing medium. It needs thorough analysis and amount of soil will be a major factor.
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(160) Brazil (30 Sep 2016 3:34 PM)</b> BACKGROUND During second consultation COSAVE countries commented that the draft should focus on the identification of risk factors and risk management options of the growing media associated to plants for planting moving in International trade, and not on plants for planting. COSAVE countries commented that there was confusion throughout the draft about the purpose of the standard, when referring to the methods of production of growing media and methods of production of plants for planting and that the standard should provide guidelines for assessing the risk of the growing media associated to plants in international trade, since the pest risk of the plants for planting is assessed using ISPMs 2, 11, 21 and 36. Consequently COSAVE countries suggested to remove from the draft those pest risk factors and pest risk management options associated with plants for planting (e.g. postentry quarantine, pest free area). For the same reasons, they proposed to delete pest risk management option of "postentry quarantine", since it is an option for the plants for planting and it is not adequate to minimize the pest risk of growing media.

		<p>During CMF 10 COSAVE countries presented a formal objection to the adoption of this draft standard because it was mainly focused on pest risk assessment and pest risk management options applied to plants for planting and the real purpose of the draft was “to provide guidance for the assessment of the pest risk of growing media in association with plants for planting in international movement”</p> <p>The formal objection was discussed by the Standard Committee in November 2015, and the following clarifications are provided:</p> <ul style="list-style-type: none"> <li>• The formal objection presented did not provide specific improvements to the draft considering the nature of the objection, which was submitted with a different approach than the draft developed.</li> <li>• The formal objection was presented because the draft was focused on the growing media where plants were grown, but not on the growing media where plants are commonly traded.</li> <li>• The draft submitted to third member consultation still not differentiate risk management options for PFP moved with growing media in which they were grown versus PFP replanted in new growing media before they are moved.</li> <li>• Post entry quarantine was maintained as a measure for growing media associated with plants for planting in cases when quarantine pests are not detectable, but this is a measure applicable to PFP in relation to the pests associated to the PFP. Otherwise examples of pests that are not easily detectable in growing media that could affect plants for planting during post entry quarantine should be given.</li> <li>• Finally the approved specification mentioned soil and growing media, and the risk of soil as a growing media is still not cleared addressed. It reminded that most countries in Latin America and many other countries prohibit soil in their national legislation.</li> </ul> <p>CONCLUSION</p> <p>COSAVE countries consider that changes introduced to the draft submitted to the third consultation do not address the main issues objected. Thus, the draft does not include substantive changes compared with the draft submitted for the second round of consultation.</p> <p>Therefore, the same comments are applicable to the current version.</p> <p>COSAVE countries are not proposing specific improvements to the draft because there would be necessary to redraft the entire document and for that reason request that an expert working group redraft the standard in order to address their comments.</p> <p>Finally, COSAVE countries believe that if this draft is adopted, it would not be useful in practice and will not be implemented by many countries.</p>
G	(General Comment)	<p><i>Category : SUBSTANTIVE</i>  <b>(158) Peru (30 Sep 2016 12:14 AM)</b>  BACKGROUND</p> <p>During second consultation COSAVE countries commented that the draft should focus on the identification of risk factors and risk management options of the growing media associated to plants for planting moving in International trade, and not on plants for planting.</p> <p>COSAVE countries commented that there was confusion throughout the draft about the purpose of the standard, when referring to the methods of production of growing media and methods of production of plants for planting and that the standard should provide guidelines for assessing the risk of the growing media associated to plants in</p>

		<p>international trade, since the pest risk of the plants for planting is assessed using ISPMs 2, 11, 21 and 36.</p> <p>Consequently COSAVE countries suggested to remove from the draft those pest risk factors and pest risk management options associated with plants for planting (e.g. post-entry quarantine, pest free area). For the same reasons, they proposed to delete pest risk management option of “post-entry quarantine”, since it is an option for the plants for planting and it is not adequate to minimize the pest risk of growing media.</p> <p>During CMF 10 COSAVE countries presented a formal objection to the adoption of this draft standard because it was mainly focused on pest risk assessment and pest risk management options applied to plants for planting and the real purpose of the draft was “to provide guidance for the assessment of the pest risk of growing media in association with plants for planting in international movement”</p> <p>The formal objection was discussed by the Standard Committee in November 2015, and the following clarifications are provided:</p> <ul style="list-style-type: none"> <li>• The formal objection presented did not provide specific improvements to the draft considering the nature of the objection, which was submitted with a different approach than the draft developed.</li> <li>• The formal objection was presented because the draft was focused on the growing media where plants were grown, but not on the growing media where plants are commonly traded.</li> <li>• The draft submitted to third member consultation still not differentiate risk management options for PFP moved with growing media in which they were grown versus PFP replanted in new growing media before they are moved.</li> <li>• Post entry quarantine was maintained as a measure for growing media associated with plants for planting in cases when quarantine pests are not detectable, but this is a measure applicable to PFP in relation to the pests associated to the PFP. Otherwise examples of pests that are not easily detectable in growing media that could affect plants for planting during post entry quarantine should be given.</li> <li>• Finally the approved specification mentioned soil and growing media, and the risk of soil as a growing media is still not cleared addressed. It reminded that most countries in Latin America and many other countries prohibit soil in their national legislation.</li> </ul> <p>CONCLUSION</p> <p>COSAVE countries consider that changes introduced to the draft submitted to the third consultation do not address the main issues objected. Thus, the draft does not include substantive changes compared with the draft submitted for the second round of consultation. Therefore, the same comments are applicable to the current version.</p> <p>COSAVE countries are not proposing specific improvements to the draft because there would be necessary to redraft the entire document and for that reason request that an expert working group redraft the standard in order to address their comments.</p> <p>Finally, COSAVE countries believe that if this draft is adopted, it would not be useful in practice and will not be implemented by many countries.</p>
G	(General Comment)	<p>Category : <i>SUBSTANTIVE</i>  <b>(157) Barbados (29 Sep 2016 9:30 PM)</b></p>

		The document provides a good idea of the issues associated with the different types of growing media associated with plants but could of gone further in providing prescriptive measures that could be used to reduce risk of pest entry (e.g. types of chemicals, fumigation products)
G	(General Comment)	<p><i>Category : SUBSTANTIVE</i>  <b>(156) Algeria (29 Sep 2016 4:59 PM)</b>          No Comment</p>
G	(General Comment)	<p><i>Category : EDITORIAL</i>  <b>(138) European Union (29 Sep 2016 3:49 PM)</b>          The IPPC Secretariat should be asked to do a global check of the text, check and tidy up the pest names (spelling, italics etc.).</p>
G	(General Comment)	<p><i>Category : SUBSTANTIVE</i>  <b>(137) Argentina (29 Sep 2016 5:29 AM)</b>          During second consultation COSAVE countries commented that the draft should focus on the identification of risk factors and risk management options of the growing media associated to plants for planting moving in International trade, and not on plants for planting.          COSAVE countries commented that there was confusion throughout the draft about the purpose of the standard, when referring to the methods of production of growing media and methods of production of plants for planting and that the standard should provide guidelines for assessing the risk of the growing media associated to plants in international trade, since the pest risk of the plants for planting is assessed using ISPMs 2, 11, 21 and 36.          Consequently COSAVE countries suggested to remove from the draft those pest risk factors and pest risk management options associated with plants for planting (e.g. post-entry quarantine, pest free area). For the same reasons, they proposed to delete pest risk management option of “post-entry quarantine”, since it is an option for the plants for planting and it is not adequate to minimize the pest risk of growing media.          During CMF 10 COSAVE countries presented a formal objection to the adoption of this draft standard because it was mainly focused on pest risk assessment and pest risk management options applied to plants for planting and the real purpose of the draft was “to provide guidance for the assessment of the pest risk of growing media in association with plants for planting in international movement”. Furthermore, the draft was focused on the growing media where plants were grown, rather than on the growing media where plants are commonly traded          The formal objection presented by COSAVE did not provide specific improvements to the draft considering the nature of the objection, which implied a different approach of the draft.</p> <p><b>DRAFT STANDARD SUBMITTED TO A THIRD CONSULTATION</b>          COSAVE countries believe that the draft standard submitted to a third consultation process still do not adequately address these issues due to the following reasons:</p> <ul style="list-style-type: none"> <li>• The draft still not differentiate appropriately risk management options for PFP moved with growing media in which they were grown versus PFP replanted in new growing media before they are moved.</li> <li>• Post entry quarantine (PEQ) was maintained as a measure for growing media associated with plants for planting in cases when quarantine pests are not detectable. Nevertheless, PEQ is a measure applicable to PFP in relation to the pests associated to the PFP. Otherwise examples of pests that are not easily detectable in growing media</li> </ul>

		<p>that could affect plants for planting during post entry quarantine should be given.</p> <ul style="list-style-type: none"> <li>• The Specification 43 was referred to soil and growing media, but the risk of soil as a growing media is still not clearly addressed in the draft standard. It is reminded that most countries in Latin America and many other countries prohibit soil in their national legislation.</li> </ul> <p>CONCLUSION          COSAVE countries consider that changes introduced to the draft submitted to a third consultation period do not adequately address the main issues that were objected during the previous consultation. Thus, the draft does not include substantive changes compared with the draft submitted for the second round of consultation. Therefore, the same comments are applicable to the current version.          COSAVE countries are not proposing specific improvements to the draft because there would be necessary to redraft the document as a whole and for that reason suggest that an expert working group redraft the standard in order to address these issues.          Finally, COSAVE countries believe that if this draft is adopted, it would not be useful in practice and will not be implemented by many countries.</p>
G	(General Comment)	<p><i>Category : SUBSTANTIVE</i>  <b>(130) Uruguay (26 Sep 2016 9:18 PM)</b>          During second consultation COSAVE countries commented that the draft should focus on the identification of risk factors and risk management options of the growing media associated to plants for planting moving in international trade, and not on plants for planting.</p> <p>COSAVE countries commented that there was a confusion throughout the draft about the purpose of the standard, when referring to the methods of production of growing media and methods of production of plants for planting and that the standard should provide guidelines for assessing the risk of the growing media associated to plants in international trade, since the pest risk of the plants for planting is assessed using ISPMs 2, 11, 21 and 36.</p> <p>Consequently COSAVE countries suggested to remove from the draft those pest risk factors and pest risk management options associated with plants for planting (e.g. post entry quarantine, pest free area). For the same reasons, they proposed to delete pest risk management option of "post-entry quarantine", since it is an option for the plants for planting and it is not adequate to minimize the pest risk of growing media.</p> <p>During CPM 10 COSAVE countries presented a formal objection to the adoption of this standard because it was mainly focused on pest risk assessment and pest risk management options applied to plants for planting and the real purpose of the draft was "to provide guidance for the assessment of the pest risk of growing media in association with plants for planting in international movement". Furthermore, the draft was focused on the growing media where the plants were grown, rather than on the growing media where plants are commonly traded. The formal objection presented by COSAVE countries did not provide specific improvements to the draft considering the nature of the objection, which implied a different approach of the text.</p>

		<p>DRAFT STANDARD SUBMITTED TO A THIRD CONSULTATION: COSAVE countries believe that the draft standard submitted to a third consultation process still does not adequately address these issues due to the following reasons:</p> <ul style="list-style-type: none"> <li>- The draft still does not differentiate appropriately risk management options of PFP moved with growing media in which they grown versus PFP replanted in new growing media before they are moved.</li> <li>- Post entry quarantine (PEQ) was maintained as a measure for growing media associated with plants for planting in cases when quarantine pests are not detectable. nevertheless, PEQ is a measure applicable to PFP in relation to the pests associated to the PFP. Otherwise examples of pests that are not easily detectable in growing media that could affect plants for planting during post entry quarantine should be given.</li> <li>- The specification 43 was referred to soil and growing media, but the risk of soil as a growing media is still not clearly addressed in the draft standard. It is reminded that most countries in Latin America and many other countries prohibit soil in their national regulations.</li> </ul> <p>CONCLUSION: COSAVE countries consider that changes introduced to the draft submitted to a third consultation period does not adequately address the main issues that were objected during previous consultation. Thus, the draft does not include substantive changes compared with the draft submitted to the second round of consultation. Therefore, the same comments are applicable to the current version. COSAVE countries are not proposing specific improvements to the draft because there would be necessary to redraft the document as a whole and for that reason suggest that an expert working group redraft the standard in order to address these issues. Finally, COSAVE countries believe that if this draft is adopted, it would not be useful in practice and will not be implemented by many countries.</p>
G	(General Comment)	<p><i>Category : SUBSTANTIVE</i>  <b>(136) Chile (28 Sep 2016 6:32 PM)</b></p> <p>During second consultation COSAVE countries commented that the draft should focus on the identification of risk factors and risk management options of the growing media associated to plants for planting moving in International trade, and not on plants for planting.</p> <p>COSAVE countries commented that there was confusion throughout the draft about the purpose of the standard, when referring to the methods of production of growing media and methods of production of plants for planting and that the standard should provide guidelines for assessing the risk of the growing media associated to plants in international trade, since the pest risk of the plants for planting is assessed using ISPMs 2, 11, 21 and 36.</p> <p>Consequently COSAVE countries suggested to remove from the draft those pest risk factors and pest risk management options associated with plants for planting (e.g. post-entry quarantine, pest free area). For the same reasons, they proposed to delete pest risk management option of “post-entry quarantine”, since it is an option for the plants for planting and it is not adequate to minimize the pest risk of growing media.</p>

		<p>During CMF 10 COSAVE countries presented a formal objection to the adoption of this draft standard because it was mainly focused on pest risk assessment and pest risk management options applied to plants for planting and the real purpose of the draft was “to provide guidance for the assessment of the pest risk of growing media in association with plants for planting in international movement”</p> <p>The formal objection was discussed by the Standard Committee in November 2015, and the following clarifications are provided:</p> <ul style="list-style-type: none"> <li>• The formal objection presented did not provide specific improvements to the draft considering the nature of the objection, which was submitted with a different approach than the draft developed.</li> <li>• The formal objection was presented because the draft was focused on the growing media where plants were grown, but not on the growing media where plants are commonly traded.</li> <li>• The draft submitted to third member consultation still not differentiate risk management options for PFP moved with growing media in which they were grown versus PFP replanted in new growing media before they are moved.</li> <li>• Post entry quarantine was maintained as a measure for growing media associated with plants for planting in cases when quarantine pests are not detectable, but this is a measure applicable to PFP in relation to the pests associated to the PFP. Otherwise examples of pests that are not easily detectable in growing media that could affect plants for planting during post entry quarantine should be given.</li> </ul> <p>• Finally the approved specification mentioned soil and growing media, and the risk of soil as a growing media is still not cleared addressed. It reminded that most countries in Latin America and many other countries prohibit soil in their national legislation.</p> <p><b>CONCLUSION</b></p> <p>COSAVE countries consider that changes introduced to the draft submitted to the third consultation do not address the main issues objected. Thus, the draft does not include substantive changes compared with the draft submitted for the second round of consultation. Therefore, the same comments are applicable to the current version.</p> <p>COSAVE countries are not proposing specific improvements to the draft because there would be necessary to redraft the entire document and for that reason request that an expert working group redraft the standard in order to address their comments.</p> <p>Finally, COSAVE countries believe that if this draft is adopted, it would not be useful in practice and will not be implemented by many countries.</p>
G	(General Comment)	<p><i>Category : TECHNICAL</i>  <b>(135) Iraq (28 Sep 2016 11:29 AM)</b>  No comments</p>
G	(General Comment)	<p><i>Category : SUBSTANTIVE</i>  <b>(131) New Zealand (27 Sep 2016 11:01 PM)</b>  We have no comments on this draft standard.</p>
G	(General Comment)	<p><i>Category : EDITORIAL</i>  <b>(129) Viet Nam (26 Sep 2016 10:35 AM)</b>  In annex 1: could not add more words to comments column (for example: for tree fern slabs), so Vietnam may do in "constituents of growing media" column</p>

G	(General Comment)	<i>Category : EDITORIAL</i> <b>(126) PPPO (26 Sep 2016 12:39 AM)</b> PPPO has no comment on the draft ISPM
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(71) United States of America (22 Sep 2016 9:35 PM)</b> Create new section on compliance with reference to ISPMs 23 and 36.  See where appropriate in the draft to make stronger connections with ISPM 36.
G	(General Comment)	<i>Category : TECHNICAL</i> <b>(70) United States of America (22 Sep 2016 9:35 PM)</b> Sterilization (105C) vs. Pasteurization (70C?) – pasteurization is more traditionally used, however it does not completely address the risks for all pests as sterilization would.
G	(General Comment)	<i>Category : EDITORIAL</i> <b>(69) United States of America (22 Sep 2016 9:34 PM)</b> Is this media (plural) or medium (singular) throughout the draft, or both? If there is a difference, editorial changes should be made throughout the draft. Suggest media for plain language and translating into other languages.
G	(General Comment)	<i>Category : EDITORIAL</i> <b>(68) EPPO (22 Sep 2016 2:28 PM)</b> The IPPC Secretariat should be asked to do a global check of the text and tidy up the pest names names (spelling, italics etc.)
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(67) Australia (22 Sep 2016 11:39 AM)</b> Australia is happy with the draft and has no comments
G	(General Comment)	<i>Category : TECHNICAL</i> <b>(63) Samoa (22 Sep 2016 4:14 AM)</b> I have no further comments
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(36) Zambia (8 Sep 2016 6:38 AM)</b> The Draft ISPM in my view, is sufficiently covered and well elaborated going by its scope.
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(26) Tajikistan (29 Aug 2016 1:51 PM)</b> I support the document as it is and I have no comments
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(25) COSAVE (12 Aug 2016 4:54 PM)</b> BACKGROUND During second consultation COSAVE countries commented that the draft should focus on the identification of risk factors and risk management options of the growing media associated to plants for planting moving in International trade, and not on plants for planting.  COSAVE countries commented that there was confusion throughout the draft about the purpose of the standard, when referring to the methods of production of growing media and methods of production of plants for planting and that the standard should provide guidelines for assessing the risk of the growing media associated to plants in international trade, since the pest risk of the plants for planting is assessed using ISPMs 2, 11, 21 and 36.

		<p>Consequently COSAVE countries suggested to remove from the draft those pest risk factors and pest risk management options associated with plants for planting (e.g. post-entry quarantine, pest free area). For the same reasons, they proposed to delete pest risk management option of “post-entry quarantine”, since it is an option for the plants for planting and it is not adequate to minimize the pest risk of growing media.</p> <p>During CMF 10 COSAVE countries presented a formal objection to the adoption of this draft standard because it was mainly focused on pest risk assessment and pest risk management options applied to plants for planting and the real purpose of the draft was “to provide guidance for the assessment of the pest risk of growing media in association with plants for planting in international movement”</p> <p>The formal objection was discussed by the Standard Committee in November 2015, and the following clarifications are provided:</p> <ul style="list-style-type: none"> <li>• The formal objection presented did not provide specific improvements to the draft considering the nature of the objection, which was submitted with a different approach than the draft developed.</li> <li>• The formal objection was presented because the draft was focused on the growing media where plants were grown, but not on the growing media where plants are commonly traded.</li> <li>• The draft submitted to third member consultation still not differentiate risk management options for PFP moved with growing media in which they were grown versus PFP replanted in new growing media before they are moved.</li> <li>• Post entry quarantine was maintained as a measure for growing media associated with plants for planting in cases when quarantine pests are not detectable, but this is a measure applicable to PFP in relation to the pests associated to the PFP. Otherwise examples of pests that are not easily detectable in growing media that could affect plants for planting during post entry quarantine should be given.</li> </ul> <p>• Finally the approved specification mentioned soil and growing media, and the risk of soil as a growing media is still not cleared addressed. It reminded that most countries in Latin America and many other countries prohibit soil in their national legislation.</p> <p><b>CONCLUSION</b></p> <p>COSAVE countries consider that changes introduced to the draft submitted to the third consultation do not address the main issues objected. Thus, the draft does not include substantive changes compared with the draft submitted for the second round of consultation. Therefore, the same comments are applicable to the current version. COSAVE countries are not proposing specific improvements to the draft because there would be necessary to redraft the entire document and for that reason request that an expert working group redraft the standard in order to address their comments.</p> <p>Finally, COSAVE countries believe that if this draft is adopted, it would not be useful in practice and will not be implemented by many countries.</p>
G	(General Comment)	<p><i>Category : SUBSTANTIVE</i>  <b>(9) China (23 Jul 2016 6:05 AM)</b>                  Growing medium should be defined by this standard does not include soil or as a growth medium composition of the soil.</p>

		<b>China (23 Jul 2016 6:06 AM)</b> Soil which has high risk (in addition to carrying plant pest risk, easy to carry and animal infectious disease risk factors), is prohibited by legislation in many countries.
1	<b>Draft ISPM: International movement of growing media in association with plants for planting (2005-004)</b>	<i>Category : TECHNICAL</i> <b>(155) Kenya (29 Sep 2016 4:29 PM)</b> Potential Implementation issues - In dealing with re-export plants it may be that the re-export country import requirements are different to the final import country requirements i.e. Country A imported plants with media from country B. Country B met the requirements of Country A but Country C which is importing the same plants from Country A has more different requirements for growing media. - How to overcome this issue- effective treatment of growing media should be practised
50	[Soil: Naturally occurring growing medium (except peat) consisting of a mixture of minerals and organic material.]	<i>Category : EDITORIAL</i> <b>(165) Canada (30 Sep 2016 8:55 PM)</b> Minor editorial change
50	[Soil: <del>Naturally occurring</del> <u>Naturally-occurring</u> growing medium (except peat) consisting of a mixture of minerals and organic material.]	<i>Category : EDITORIAL</i> <b>(164) Canada (30 Sep 2016 8:49 PM)</b> Minor editorial
50	<del>[Soil: Naturally occurring growing medium (except peat) consisting of a mixture of minerals and organic material.]]</del>	<i>Category : EDITORIAL</i> <b>(127) Viet Nam (26 Sep 2016 10:05 AM)</b> Should be delete the definition of "soil" as considered not needed. In many countries, soil is often prohibited
50	<del>[Soil: Naturally occurring growing medium (except peat) consisting of a mixture of minerals and organic material.]</del>	<i>Category : SUBSTANTIVE</i> <b>(72) United States of America (22 Sep 2016 9:35 PM)</b> Propose for deletion because it is not describing soil. It is describing growing media, which is defined in ISPM 5.
50	[Soil: Naturally occurring growing medium (except peat) consisting of a mixture of minerals and organic material.]	<i>Category : SUBSTANTIVE</i> <b>(10) China (23 Jul 2016 6:07 AM)</b> Suggest to clarify the definition of "Soil"
56	<b>BACKGROUND</b>	<i>Category : SUBSTANTIVE</i> <b>(159) Bolivia (30 Sep 2016 2:52 PM)</b> During second consultation COSAVE countries commented that the draft should focus on the identification of risk factors and risk management options of the growing media associated to plants for planting moving in International trade, and not on plants for planting. Commented that there was confusion throughout the draft about the purpose of the standard, when referring to the methods of production of growing media and methods of production of plants for planting and that the standard should provide guidelines for assessing the risk of the growing media associated to plants in international trade, since the pest risk of the plants for planting is assessed using ISPMs 2, 11, 21 and 36.
57	<del>A number of growing media are recognized internationally as pathways for the introduction and spread of quarantine pests.</del> Soil as a growing medium is considered to be a high-risk pathway because it can harbour numerous quarantine pests and a number of other growing media are also recognised pathways for the	<i>Category : TECHNICAL</i> <b>(139) European Union (29 Sep 2016 3:51 PM)</b> Improved clarity and better reflects what the ISPM is trying to cover.

	<a href="#">introduction and spread of quarantine</a> pests. The pest risk of growing media in association with plants for planting depends on factors related to both the production of the growing media and the production of the plants, as well as the interaction of the two.	
57	<del>A number of growing media are recognized internationally as pathways for the introduction and spread of quarantine pests.</del> Soil as a growing medium is considered to be a high-risk pathway because it can harbour numerous quarantine pests and a number of other growing media are also recognised pathways for the introduction and spread of quarantine pests. The pest risk of growing media in association with plants for planting depends on factors related to both the production of the growing media and the production of the plants, as well as the interaction of the two.	<i>Category : TECHNICAL</i> <b>(50) EPPO (21 Sep 2016 5:53 PM)</b> Technical/editorial? improved clarity and better reflects what the ISPM is trying to cover.
57	A number of growing media are recognized internationally as pathways for the introduction and spread of <a href="#">quarantine-regulated</a> pests. Soil as a growing medium is considered to be a high-risk pathway because it can harbour numerous quarantine pests. The pest risk of growing media in association with plants for planting depends on factors related to both the production of the growing media and the production of the plants, as well as the interaction of the two.	<i>Category : SUBSTANTIVE</i> <b>(11) China (23 Jul 2016 6:11 AM)</b>  <b>China (23 Jul 2016 6:11 AM)</b> Replacement of the word 'quarantine' with 'regulated'.The terminology regulated pests as defined in ISPM5.Glossary of phytosanitary term includes both quarantine and regulated non-quarantine pests. regulate is more accurate.
58	Many countries therefore regulate the import of growing media in association with plants for planting. Growing media, particularly soil, are often prohibited. While it is possible to remove growing media from some plants for planting, it may be difficult to completely avoid the movement of growing media in association with plants for planting. Some plants can survive transport only when moved in growing media. <del>This standard provides guidance on internationally harmonized phytosanitary measures to minimize the probability of introduction or spread of quarantine pests with the international movement of growing media in association with plants for planting.</del>	<i>Category : TECHNICAL</i> <b>(140) European Union (29 Sep 2016 3:52 PM)</b> The deleted text unnecessarily repeated the Scope. Furthermore, the standard strictly speaking does not 'provide guidance on internationally harmonized phytosanitary measures'.... Because measures only become internationally harmonized once (many) countries have implemented them into their legislation... (so: 'with a view to international harmonization' would have been more correct, - but anyway not necessary.
58	Many countries therefore regulate the <a href="#">import-importation</a> of growing media in association with plants for planting. Growing media, particularly soil, are often prohibited. While it is possible to remove growing media from some plants for planting, it may be difficult to completely avoid the movement of growing media in association with plants for planting. Some plants can survive transport only when moved in growing media. This standard provides guidance on internationally harmonized phytosanitary measures to minimize the probability of introduction or spread of quarantine pests with the international movement of growing media in association with plants for planting.	<i>Category : EDITORIAL</i> <b>(73) United States of America (22 Sep 2016 9:36 PM)</b> For clarity
58	Many countries therefore regulate the import of growing media in association with plants for planting. Growing media, particularly soil, are often prohibited. While it	<i>Category : SUBSTANTIVE</i> <b>(65) South Africa (22 Sep 2016 11:13 AM)</b>

	is possible to remove growing media from some plants for planting, it may be difficult to completely avoid the movement of growing media in association with plants for planting. Some plants can survive transport only when moved in growing media. This standard provides guidance on internationally harmonized phytosanitary measures to minimize the probability of introduction or spread of quarantine pests with the international movement of growing media in association with plants for planting– <u>Many countries have legislation in place to regulate the movement of growing media, particularly soil or soil as a component of growing media but not necessarily for growing media associated with plants for planting</u>	<ul style="list-style-type: none"> <li>• Addition of the sentence: “Many countries have legislation in place to regulate the movement of growing media”. The addition of the sentence in this paragraph provides a better understanding and to substantiate the need for this draft ISPM.</li> </ul>
58	Many countries therefore regulate the import of growing media in association with plants for planting. Growing media, particularly soil, are often prohibited. While it is possible to remove growing media from some plants for planting, it may be difficult to completely avoid the movement of growing media in association with plants for planting. Some plants can survive transport only when moved in growing media. This standard provides guidance on internationally harmonized phytosanitary measures to minimize the probability of introduction or spread of <u>quarantine-regulated</u> pests with the international movement of growing media in association with plants for planting.	<p><i>Category : SUBSTANTIVE</i>  <b>(64) South Africa (22 Sep 2016 11:11 AM)</b></p> <ul style="list-style-type: none"> <li>• Replacement of the word “quarantine” with “regulated”. The terminology regulated pests as defined in the IPPC Glossary of phytosanitary terms: ISPM 5 (2009) includes both quarantine and regulated non--quarantine pests.</li> </ul>
58	Many countries therefore regulate the import of growing media in association with plants for planting. Growing media, particularly soil, are often prohibited. While it is possible to remove growing media from some plants for planting, it may be difficult to completely avoid the movement of growing media in association with plants for planting. Some plants can survive transport only when moved in growing media. <u>This standard provides guidance on internationally harmonized phytosanitary measures to minimize the probability of introduction or spread of quarantine pests with the international movement of growing media in association with plants for planting.</u>	<p><i>Category : TECHNICAL</i>  <b>(51) Eppo (21 Sep 2016 5:53 PM)</b></p> <p>The deleted text unnecessarily repeated the Scope. Furthermore, the standard strictly speaking does not ‘provide guidance on internationally harmonized phytosanitary measures’.... Because measures only become internationally harmonized once (many) countries have implemented them into their legislation... (so: ‘with a view to international harmonization’ would have been more correct, - but anyway not necessary.</p>
60	Pests associated with the international movement of growing media in association with plants for planting may have negative impacts on biodiversity. Implementation of this standard could significantly reduce the introduction and spread of <u>quarantine-regulated</u> pests associated with growing media and consequently reduce their negative impacts. In addition, the application of phytosanitary measures in accordance with this standard could also reduce the probability of introduction and spread of other organisms that may become invasive alien species in the importing country and thus affect biodiversity.	<p><i>Category : SUBSTANTIVE</i>  <b>(66) South Africa (22 Sep 2016 11:16 AM)</b></p> <ul style="list-style-type: none"> <li>• Replacement of the word “quarantine” with “regulated”. The terminology regulated pests as defined in the IPPC Glossary of phytosanitary terms: ISPM 5 (2009) includes both quarantine and regulated non--quarantine pests.</li> </ul>
64	Phytosanitary import requirements for growing media in association with plants for planting should be technically justified. This technical justification should be based on a <u>PRA-Pest Risk Analysis (PRA)</u> in accordance with ISPM 2 (Framework for	<p><i>Category : EDITORIAL</i>  <b>(166) Canada (30 Sep 2016 8:58 PM)</b></p> <p>Editorial changes to enhance clarity.</p>

	pest risk analysis), ISPM 11 (Pest risk analysis for quarantine pests) and ISPM 21 (Pest risk analysis for regulated non-quarantine pests), <del>and that includes</del> . <u>The PRA should consider</u> the <del>consideration of</del> factors that affect the pest risk of growing media described in this standard and factors related to the production of plants for planting described in Annex 1 of ISPM 36 (Integrated measures for plants for planting). The pest risk <del>of posed by</del> plants for planting and that of the associated growing media in which the plants were grown should be assessed together.	
64	Phytosanitary import requirements for growing media in association with plants for planting should be technically <u>justified</u> . <del>This technical justification should be justified and</del> based on a PRA in accordance with ISPM 2 (Framework for pest risk analysis), ISPM 11 (Pest risk analysis for quarantine pests) and ISPM 21 (Pest risk analysis for regulated non-quarantine pests), and <del>that includes the include</del> consideration of factors that affect the pest risk of growing media described in this standard and factors related to the production of plants for planting described in Annex 1 of ISPM 36 (Integrated measures for plants for planting). The pest risk of plants for planting and that of the associated growing media in which the plants were grown should be assessed together.	Category : EDITORIAL <b>(141) European Union (29 Sep 2016 3:53 PM)</b> Improved clarity.
64	Phytosanitary import requirements for growing media in association with plants for planting should be technically <u>justified</u> . <del>This technical justification should be justified and</del> based on a PRA in accordance with ISPM 2 (Framework for pest risk analysis), ISPM 11 (Pest risk analysis for quarantine pests) and ISPM 21 (Pest risk analysis for regulated non-quarantine pests), and <del>that includes the include</del> consideration of factors that affect the pest risk of growing media described in this standard and factors related to the production of plants for planting described in Annex 1 of ISPM 36 (Integrated measures for plants for planting). The pest risk of plants for planting and that of the associated growing media in which the plants were grown should be assessed together.	Category : EDITORIAL <b>(52) EPP0 (21 Sep 2016 5:53 PM)</b> Improved clarity
64	Phytosanitary import requirements for growing media in association with plants for planting should be technically justified. This technical justification should be based on a PRA in accordance with ISPM 2 ( <del>Framework for pest risk analysis</del> )( <i>Framework for pest risk analysis</i> ), ISPM 11 ( <del>Pest risk analysis for quarantine pests</del> )( <i>Pest risk analysis for quarantine pests</i> ) and ISPM 21 ( <del>Pest risk analysis for regulated non-quarantine pests</del> )( <i>Pest risk analysis for regulated non-quarantine pests</i> ), and that includes the consideration of factors that affect the pest risk of growing media described in this standard and factors related to the production of plants for planting described in Annex 1 of ISPM 36 ( <del>Integrated measures for plants for planting</del> )( <i>Integrated measures for plants for planting</i> ). The	Category : EDITORIAL <b>(28) Thailand (30 Aug 2016 12:46 PM)</b> The title of ISPM that are referred in this standard should be italicized.

	pest risk of plants for planting and that of the associated growing media in which the plants were grown should be assessed together.	
65	<del>Pests that may be associated with growing media include: bacteria, phytoplasmas, fungi, oomycetes, nematodes, viruses, viroids, insects, mites, molluscs, plants as pests and seeds of plants as pests.</del> It should be noted that quarantine pests carried with growing medium in association with a plant may be pests of other plants, or may act as a vector for other pests.	Category : EDITORIAL <b>(142) European Union (29 Sep 2016 3:54 PM)</b> This is a list of everything so it is not correct to say 'including.....' The second sentence is the only one which really needs to be included.
65	<del>Pests that may be</del> Some of the organisms associated with growing media <del>include</del> may become pests, including: bacteria, phytoplasmas, fungi, oomycetes, nematodes, viruses, viroids, insects, mites, molluscs, plants as pests and seeds of plants as pests. It should be noted that quarantine pests carried with growing medium in association with a plant may be pests of other plants, or may act as a vector for other pests.	Category : TECHNICAL <b>(74) United States of America (22 Sep 2016 9:36 PM)</b> Not all of the organisms are pests; some of them listed could be free-living organisms.
65	<del>Pests that may be associated with growing media include: bacteria, phytoplasmas, fungi, oomycetes, nematodes, viruses, viroids, insects, mites, molluscs, plants as pests and seeds of plants as pests.</del> It should be noted that quarantine pests carried with growing medium in association with a plant may be pests of other plants, or may act as a vector for other pests.	Category : EDITORIAL <b>(53) EPPO (21 Sep 2016 5:53 PM)</b> This is a list of everything so it is not correct to say 'including.....' The second sentence is the only one which really needs to be included.
67	The production methods of plants for planting may affect the pest risk of the growing media used. While some growing media may pose a low pest risk by nature of their production, they may become contaminated or infested depending on the type <del>and composition</del> of <del>the</del> growing medium during the production process of plants for planting.	Category : TECHNICAL <b>(167) Canada (30 Sep 2016 8:59 PM)</b> Composition of the media is an important risk factor.
67	The production methods of plants for planting may affect the pest risk of the growing media used. While some growing media may pose a low pest risk by nature of their production, they may become contaminated or <del>infested-infested</del> , depending on the type of growing <del>medium-medium</del> , during the production process of plants for planting.	Category : EDITORIAL <b>(143) European Union (29 Sep 2016 3:55 PM)</b> It is clearer with two commas.
67	The production methods of plants for planting may affect the pest risk of the growing media used. While some growing media may pose a low pest risk by nature of their production, they may become contaminated or infested <del>depending on the type of growing medium</del> during the production process of plants for planting.	Category : EDITORIAL <b>(75) United States of America (22 Sep 2016 9:37 PM)</b> This text is redundant.
67	The production methods of plants for planting may affect the pest risk of the growing media used. While some growing media may pose a low pest risk by nature of their production, they may become contaminated or <del>infested-infested</del> ,	Category : EDITORIAL <b>(54) EPPO (21 Sep 2016 5:53 PM)</b> Clearer with two commas?

	depending on the type of growing <del>medium-medium</del> , during the production process of plants for planting.	
67	The production methods of plants for planting may <del>affect-be affected by</del> the pest risk of the growing media used. While some growing media may pose a low pest risk by nature of their production, they may become contaminated or infested depending on the type of growing medium during the production process of plants for planting.	Category : EDITORIAL (2) Sri Lanka (22 Jul 2016 1:40 PM)
68	The <del>national plant protection organization-National Plant Protection Organization</del> (NPPO) of the importing country may take into consideration the pest risk of growing media in association with plants for planting (as outlined in Annex 1, Annex 2 and Appendix 1) when conducting a PRA to identify appropriate phytosanitary measures. Based on the pests regulated by the importing country, the PRA should consider the pest status in the importing and exporting countries. Furthermore, pest risk may also depend on:	Category : EDITORIAL (3) Sri Lanka (22 Jul 2016 1:41 PM)
71	the <del>constituents-components</del> of the growing media	Category : TECHNICAL (76) United States of America (22 Sep 2016 9:38 PM) The US recommends a global change to components from constituents. The meaning of constituents in US English is different than what is meant here.
73	the measures to prevent contamination or infestation of the growing media before planting, such as during transportation and storage, <del>and</del> - during plant propagation and production (e.g. avoiding exposure to <del>soil</del> <u>high risk growing media</u> , treatment of the irrigation <del>water</del> <u>water and use of clean starter plant stock</u> )	Category : SUBSTANTIVE (77) United States of America (22 Sep 2016 9:39 PM) Separated in two different processes. Emphasize that the measures to prevent risk is different before planting and during propagation and production. Soil is not singled out in the standard. Neither does it have a definition in ISPM 5 – defined in growing media definition
75	the quantity of growing media associated with <del>each individual plant</del> <u>the whole consignment</u>	Category : TECHNICAL (152) Kenya (29 Sep 2016 4:16 PM) Amend to the quantity of growing media associated with the whole consignment- if the plants are very small then the quantity associated with the individual plant is very small it would be better to consider the whole consignment.
76	<del>the purpose of the plants for planting associated with the growing media (e.g. whether plants are to be grown as annuals or perennials, whether they are to be grown indoors or outdoors, whether they are to be grown in an urban area, field or nursery).</del>	Category : TECHNICAL (13) China (23 Jul 2016 6:15 AM)  China (23 Jul 2016 6:15 AM) Easier to understand ,Planting environment have bigger effect on the risk of the growing medium.
76	- the purpose of the plants for planting associated with the growing media (e.g. whether plants are to be grown as annuals or perennials, whether they are to be grown indoors or outdoors, whether they are to be grown in an urban area, field or nursery).	Category : TECHNICAL (12) China (23 Jul 2016 6:13 AM) Add: epidemic prevention measures for growing plants. before using of growth medium China (23 Jul 2016 6:14 AM) The pest risk of growing media in association with plants for planting depends on factors related to epidemic prevention measures for growing plants.

77	In the assessment of pest risk, data on historical or existing import of soil or other growing media <u>and its geographical origin</u> may be relevant.	<i>Category : TECHNICAL</i> <b>(144) European Union (29 Sep 2016 3:56 PM)</b> To emphasize the importance for pest risk of the media's origin.
77	In the assessment of pest risk, data on historical or existing <del>import</del> <u>importation</u> of <del>soil or other</del> growing media may be relevant.	<i>Category : EDITORIAL</i> <b>(78) United States of America (22 Sep 2016 9:40 PM)</b> 1st change: Correct language. 2nd change: Soil is included in growing media definition.
77	In the assessment of pest risk, data on historical or existing import of soil or other growing media <u>and its geographival origin</u> may be relevant.	<i>Category : TECHNICAL</i> <b>(55) EPPO (21 Sep 2016 5:53 PM)</b> To emphasize the importance for pest risk of the media's origin
78	The origin and the production method of constituents of growing media both affect the pest risk of growing media in association with plants for planting. Annex 1 lists common constituents of growing media and indicates their relative pest risk under the assumption that they were not previously used as growing media and that they have been handled and stored in a way that prevents their contamination <del>or</del> <u>infestation and re-contamination</u> .	<i>Category : SUBSTANTIVE</i> <b>(81) United States of America (22 Sep 2016 9:41 PM)</b> Infestation and contamination with pests have the same meaning.
78	The origin and the production method of constituents of growing media both affect the pest risk of growing media in association with plants for planting. Annex 1 lists common constituents of growing media and indicates <del>their</del> <u>the</u> relative pest <del>risk</del> <u>under the assumption risk, given</u> that they were not previously used as growing media and that they have been handled and stored in a way that prevents their contamination or infestation.	<i>Category : TECHNICAL</i> <b>(80) United States of America (22 Sep 2016 9:41 PM)</b> NPPO needs to have evidence, rather than to base evidence on assumptions.
78	The origin and <del>the</del> production method of constituents of growing media <del>both</del> affect the pest risk of growing media in association with plants for planting. Annex 1 lists common constituents of growing media and indicates their relative pest risk under the assumption that they were not previously used as growing media and that they have been handled and stored in a way that prevents their contamination or infestation.	<i>Category : EDITORIAL</i> <b>(79) United States of America (22 Sep 2016 9:41 PM)</b> 1st change: Correct language 2nd change: Unnecessary
79	Growing media containing organic constituents <u>(including plant debris)</u> may be more likely to harbour pests <del>than purely mineral or synthetic growing media.</del> <u>Growing media consisting of plant debris and so</u> generally pose a greater pest risk than <u>purely</u> mineral or synthetic growing media. If soil is part of the growing medium the pest risk may be particularly difficult to fully assess because of the likely presence of many different pests and other organisms.	<i>Category : EDITORIAL</i> <b>(168) Canada (30 Sep 2016 9:01 PM)</b> Modified for clarity.
79	Growing media containing organic constituents may be more likely to harbour pests than purely mineral or synthetic growing media. Growing media consisting of plant debris generally pose a greater pest risk than mineral or synthetic growing media. If <del>soil is part of</del> the growing <del>medium</del> <u>media consists of organic components</u> , the pest risk may be particularly difficult to fully assess because of the likely	<i>Category : SUBSTANTIVE</i> <b>(82) United States of America (22 Sep 2016 9:44 PM)</b> This covers pests, free-living organisms, etc.

	presence of <del>many different pests unknown organisms</del> and <del>other organisms</del> <u>it should be processed in a way to adequately address pest risk.</u>	
82	<b>3.1 Growing media free from <u>quarantine-regulated</u> pests</b>	<i>Category : TECHNICAL</i> <b>(83) United States of America (22 Sep 2016 9:44 PM)</b> Suggest changing this to regulated pests because growing media is associated with plants for planting. Therefore regulated non quarantine pests should also be considered.
83	Growing media free from <u>quarantine-regulated</u> pests may be achieved by:	<i>Category : TECHNICAL</i> <b>(84) United States of America (22 Sep 2016 9:45 PM)</b> See US comment in paragraph 82.
88	Pest free growing media should be stored and maintained under conditions that keep them free from quarantine pests. The growing media should not be exposed to plants, pests, <del>or untreated soil or soil</del> , other untreated growing <del>media</del> <u>media or contaminated water</u> . If this has not been achieved, the growing media may need to be <del>appropriately</del> treated <u>appropriately</u> before use.	<i>Category : TECHNICAL</i> <b>(85) United States of America (22 Sep 2016 9:46 PM)</b> Many pests are carried by contaminated water.
89	Plants intended to be planted in the pest free growing media should be free from relevant quarantine pests.	<i>Category : TECHNICAL</i> <b>(153) Kenya (29 Sep 2016 4:25 PM)</b> What does relevant quarantine pests mean- relevant to the plant or in relation to the growing media?
89	Plants intended to be planted in the pest free growing media should be free from relevant <u>quarantine-regulated</u> pests.	<i>Category : TECHNICAL</i> <b>(86) United States of America (22 Sep 2016 9:46 PM)</b> See US comment in paragraph 82.
91	<del>keeping the plants (with the associated growing media) in a pest free area or pest free place of production using clean tools, clean equipment, clean containers, etc. to prevent contamination and re-contamination</del> <u>- keeping the plants (with the associated growing media) in a pest free area or pest free place of production</u>	<i>Category : SUBSTANTIVE</i> <b>(87) United States of America (22 Sep 2016 9:47 PM)</b> New first bullet: This is an important measure to prevent contamination and re-contamination
92	using water free from <u>quarantine-regulated</u> pests	<i>Category : TECHNICAL</i> <b>(88) United States of America (22 Sep 2016 9:47 PM)</b> See US comment in paragraph 82.
93	using physical isolation (e.g. protected conditions, prevention of pest transmission by wind, production on benches separated from contact with soil).  <u>Relevant examples of pest management measures to reduce pest risk, that could be appropriate for growing media, are available in ISPM 36.</u>	<i>Category : EDITORIAL</i> <b>(89) United States of America (22 Sep 2016 9:48 PM)</b> New paragraph after paragraph 93: Much more comprehensive list in Annex 1 and appendix 1 in ISPM 36.
95	Treatments to mitigate the risks associated with quarantine pests in <del>the</del> growing media may be applied at various stages in the production cycle of plants for planting. Treatments that may be applied singly or in combination include:	<i>Category : EDITORIAL</i> <b>(90) United States of America (22 Sep 2016 9:48 PM)</b> More appropriate English
99	treatment of plants <u>or propagative plant parts (e.g. seeds, bulbs, cuttings)</u> before planting	<i>Category : TECHNICAL</i> <b>(91) United States of America (22 Sep 2016 9:49 PM)</b> Better specifies the requirements

101	removal of growing media <sup>1</sup> (e.g. by root washing or plant shaking) <del>-</del> <u>and the treatment of the plants</u>	<i>Category : TECHNICAL</i> <b>(154) Kenya (29 Sep 2016 4:27 PM)</b> removal of the media does not make the plant free of pests so the statement should be- 'removal of growing media (e.g. by root washing or plant shaking) and the treatment of the plants
101	- removal of growing media <sup>1</sup> (e.g. by root washing or plant shaking).	<i>Category : TECHNICAL</i> <b>(92) United States of America (22 Sep 2016 9:50 PM)</b> We have added to the footnote. See US comment on paragraph 102.
102	In some cases, removal of growing media may be followed by replanting in not previously used pest free growing media shortly before export, if <del>authorized</del> <u>accepted</u> by the NPPO of the importing country.	<i>Category : EDITORIAL</i> <b>(145) European Union (29 Sep 2016 3:58 PM)</b> 'Authorize' is normally used in another sense in ISPMs, so for consistency & clarity 'accept' is better.
102	In some cases, removal of growing media may be followed by replanting in not previously used pest free growing media shortly before export, if authorized by the NPPO of the importing country. <u>Physical removal of growing media may not remove all pests that could impact the plants in production, because some pests actively colonize plant material.</u>	<i>Category : TECHNICAL</i> <b>(93) United States of America (22 Sep 2016 9:51 PM)</b> Better explains the concept
102	In some cases, removal of growing media may be followed by replanting in not previously used pest free growing media shortly before export, if <del>authorized</del> <u>accepted</u> by the NPPO of the importing country.	<i>Category : EDITORIAL</i> <b>(56) EPPO (21 Sep 2016 5:53 PM)</b> 'Authorize' is normally used in another sense in ISPMs, so for consistency & clarity 'accept' is better
103	Factors such as temperature may affect the results of treatments. Also, some pesticides may <u>only</u> suppress, rather than eradicate, pest populations. Verification of the effectiveness of a treatment after application may be necessary.	<i>Category : EDITORIAL</i> <b>(146) European Union (29 Sep 2016 3:59 PM)</b> To improve clarity.
103	Factors such as temperature may affect the results of treatments. Also, some pesticides may <u>only</u> suppress, rather than eradicate, pest populations. Verification of the effectiveness of a treatment after application may be necessary.	<i>Category : EDITORIAL</i> <b>(57) EPPO (21 Sep 2016 5:53 PM)</b> For clarity
104	After treatment, appropriate measures should be taken to avoid <u>re-</u> contamination or <u>re-</u> infestation.	<i>Category : TECHNICAL</i> <b>(14) China (23 Jul 2016 6:16 AM)</b>  <b>China (23 Jul 2016 6:16 AM)</b> to avoid re- contamination or re- infestationis more accurate .
106	The places of production of and the processing or treatment procedures for growing media <del>may</del> <u>should</u> be inspected, monitored and approved by the NPPO of the exporting country to ensure that phytosanitary import requirements are met.	<i>Category : SUBSTANTIVE</i> <b>(95) United States of America (22 Sep 2016 9:52 PM)</b> Ultimately the NPPO of the exporting country that is responsible for the quality of the growing media.
106	The places of production <del>of</del> and the processing or treatment procedures for growing media may be inspected, monitored and approved by the NPPO of the exporting country to ensure that phytosanitary import requirements are met.	<i>Category : EDITORIAL</i> <b>(94) United States of America (22 Sep 2016 9:52 PM)</b> Grammar fix
107	Plants for planting and associated growing media may need to be inspected to determine if pests are present or to determine compliance with phytosanitary import requirements (ISPM 23 ( <i>Guidelines for inspection</i> )). However, most pests in growing media cannot be detected by inspection <del>alone</del> <u>alone and may require other testing</u> .	<i>Category : SUBSTANTIVE</i> <b>(96) United States of America (22 Sep 2016 9:52 PM)</b> Inspection by definition is the visual process, so for some pests, other tests are required.

108	The NPPO of the importing country may require or undertake sampling and testing of the growing media associated with plants for planting (ISPM 20 ( <i>Guidelines for a phytosanitary import regulatory system</i> ); ISPM 31 ( <i>Methodologies for sampling of consignments</i> )). However, sampling and testing may not detect some types of pests, in particular at low-level contamination or infestation of the growing media. To verify that required measures have been carried out, testing may include testing for indicator organisms (easily detectable organisms whose presence indicates that required measures failed to be effective or were not implemented).	<i>Category : SUBSTANTIVE</i> <b>(97) United States of America (22 Sep 2016 9:53 PM)</b> Include either a Section on compliance or a new paragraph with references to ISPMs 23, 36 and stating responsibilities of all parties (producer of the growing medium, the user, exporting NPPO and need for a contingency plan for non-compliance.
109	<b>3.4 <del>Post-entry quarantine</del> <u>Quarantine</u></b>	<i>Category : TECHNICAL</i> <b>(98) United States of America (22 Sep 2016 9:53 PM)</b> Not every country uses the term post-entry quarantine, conducting the same processes in containment under NPPO supervision accomplishes the same purpose
110	<del>In Post-entry quarantine is widely used by NPPOs as an effective measure for plants for planting in</del> certain circumstances, such as for quarantine pests that are not easily detectable <del>in growing media at entry</del> , the NPPO of the importing country may require post-entry quarantine for <u>growing media attached to such</u> plants for planting <del>associated with growing media to verify compliance with phytosanitary import requirements reduce the pest risk</del> . Post-entry quarantine <del>may be the only option apart from prohibition</del> <u>allows for options such as testing, observation for signs or symptoms, treatment for plants for planting and growing medium attached to the plants during a quarantine period.</u>	<i>Category : EDITORIAL</i> <b>(125) Japan (25 Sep 2016 4:57 PM)</b> Formal objections which COSAVE rose at CPM10 in 2015 were “post-entry quarantine (PEQ) is an option for plants for planting not growing media” and “PEQ is not a means to verify if phytosanitary import requirements are being met”. Therefore, the revised text should adequately address these concerns. The proposed points of adding information are: - background about PEQ, e.g. PEQ is used as an effective phytosanitary measures for plants for planting, - the effectiveness of PEQ, e.g. Plants for planting are often imported with growing media together, so PEQ can become an effective phytosanitary measures for growing media attached to the plants for planting as well as plants for planting, - examples of option for growing medium attached to the plants for planting.  To delete the last sentence because PEQ is not only option apart from prohibition; i.e., measures taken as PEQ could be done pre-export.
110	In certain circumstances, such as for quarantine pests that are not easily detectable in growing media, the NPPO of the importing country may require <u>post-entry quarantine</u> for plants for planting associated with growing media to verify compliance with phytosanitary import requirements. <u>Post-entry quarantine Quarantine</u> may be the only option apart from prohibition for such cases.	<i>Category : TECHNICAL</i> <b>(99) United States of America (22 Sep 2016 9:53 PM)</b> See US comment in paragraph 109
111	<del>Post-entry quarantine Quarantine</del> may also be used for monitoring in cases where knowledge about the pest risk is incomplete or there is an indication of a failure of measures taken in the exporting country (e.g. a significant number of interceptions).	<i>Category : TECHNICAL</i> <b>(100) United States of America (22 Sep 2016 9:54 PM)</b> See US comment in paragraph 109
113	In cases where the measures outlined above are not deemed applicable, feasible or sufficient for growing media ( <del>in particular soil</del> ) in association with certain plants	<i>Category : TECHNICAL</i> <b>(101) United States of America (22 Sep 2016 9:54 PM)</b> See US comment in paragraph 50

	for planting, the entry of consignments of plants for planting associated with those particular growing media may be prohibited.	
115	<b>ANNEX 1: Common constituents of growing media ranked in order of increasing relative pest risk</b>	<i>Category : TECHNICAL</i> <b>(102) United States of America (22 Sep 2016 9:54 PM)</b> Please provide references throughout this Annex
116	The <u>approximate</u> ranking provided in this table is for constituents of growing media that have not previously been used for planting and have been handled and stored in a way that prevents contamination or infestation (e.g. they are free from soil).	<i>Category : TECHNICAL</i> <b>(169) Canada (30 Sep 2016 9:09 PM)</b> Addition of "approximate" indicates that the ranking is not absolute.
119	<b><u>Support-Facilitate</u> pest survival</b>	<i>Category : TECHNICAL</i> <b>(103) United States of America (22 Sep 2016 9:56 PM)</b> This is misleading. Under the right conditions, this could be a perfect host for pest survival.
121	Baked clay pellets	<i>Category : SUBSTANTIVE</i> <b>(132) Philippines (28 Sep 2016 9:13 AM)</b> Medium may not support pest survival but can harbour hitch-hikers, which should be indicated in the comments and include additional measure on Annex 2
127	Vermiculite, perlite, volcanic rock, zeolite, scoria	<i>Category : SUBSTANTIVE</i> <b>(133) Philippines (28 Sep 2016 9:14 AM)</b> Medium may not support pest survival but can harbour hitch-hikers, which should be indicated in the comments and include additional measure on Annex 2
130	<u>Pure clay</u> Clay	<i>Category : TECHNICAL</i> <b>(104) United States of America (22 Sep 2016 9:56 PM)</b> Does "Pure" clay assume it is sterile and does not contain microbes? Some countries' import regulations require processing to eliminate pest risk associated with organic components of these media prior to planting.
131	No	<i>Category : TECHNICAL</i> <b>(105) United States of America (22 Sep 2016 9:56 PM)</b> See US comment in paragraph 130
132		<i>Category : TECHNICAL</i> <b>(107) United States of America (22 Sep 2016 9:57 PM)</b> Provide explanation and reference
133	Pure gravel, sand	<i>Category : SUBSTANTIVE</i> <b>(134) Philippines (28 Sep 2016 9:14 AM)</b> Medium may not support pest survival but can harbour hitch-hikers, which should be indicated in the comments and include additional measure on Annex 2
133	<u>Pure gravel</u> Gravel, sand	<i>Category : TECHNICAL</i> <b>(108) United States of America (22 Sep 2016 9:57 PM)</b> "Pure" sand and gravel does not exist naturally. Is it sterile and not contain microbes? Some countries' import regulations require processing to eliminate pest risk associated with organic components of these media prior to planting.
134	No	<i>Category : TECHNICAL</i> <b>(109) United States of America (22 Sep 2016 9:58 PM)</b> See US comment in paragraph 133

135		Category : TECHNICAL <b>(110) United States of America (22 Sep 2016 9:58 PM)</b> Provide explanation and reference
136	<a href="#">Paper-Paper, including corrugated cardboard</a>	Category : TECHNICAL <b>(111) United States of America (22 Sep 2016 9:59 PM)</b> Some industries grow plants on corrugated cardboard.
137	Yes	Category : TECHNICAL <b>(112) United States of America (22 Sep 2016 9:59 PM)</b> Why is this yes to supporting pests? Provide explanation of how 137 relates to 138, and reference.
138	High level of processing	Category : TECHNICAL <b>(113) United States of America (22 Sep 2016 9:59 PM)</b> This "comment" in paragraph 138 is not clear. Please provide a better explanation of how 137 relates to 138, and reference.
140	Yes	Category : TECHNICAL <b>(114) United States of America (22 Sep 2016 10:00 PM)</b> This would be no unless contaminated after production or re-contaminated.
141	Autoclaved or otherwise sterilized before use	Category : TECHNICAL <b>(115) United States of America (22 Sep 2016 10:01 PM)</b> Suggest moving this to the top of the list. Autoclaving kills virtually everything. Therefore the media would be of least risk.
144	Risk depends on level of processing ( <del>e.g. <i>Bursaphelenchus cocophilus</i>, the red ring nematode, has been found in the husks of fallen nuts</del> )	Category : TECHNICAL <b>(147) European Union (29 Sep 2016 4:01 PM)</b> Providing an example is inconsistent (cf. e.g. § 156) and unnecessary. If not accepted - delete at least 'the red ring nematode' as only Latin names should be reported, not common names.
144	Risk depends on level of processing (e.g. <i>Bursaphelenchus cocophilus</i> , the red ring nematode, has been found in the husks of fallen nuts)	Category : TECHNICAL <b>(116) United States of America (22 Sep 2016 10:01 PM)</b> Risk depends on level of processing and whether the material was in contact with soil or other contaminated plant material. Provide reference.
144	Risk depends on level of processing ( <del>e.g. <i>Bursaphelenchus cocophilus</i>, the red ring nematode, has been found in the husks of fallen nuts</del> )	Category : TECHNICAL <b>(58) EPPO (21 Sep 2016 5:53 PM)</b> Providing an example is inconsistent (cf. e.g. § 156) and unnecessary
147	Size of particles <a href="#">and heat treatment</a> may affect the probability of pest survival	Category : TECHNICAL <b>(117) United States of America (22 Sep 2016 10:01 PM)</b> Excelsior is often heat treated at very high temperatures Suggest clarifying which pests would be affected. For example, Cerambycidae would not be able to survive when sawdust particles are too fine, but micro-organisms can survive on fine particles. Examples as given in paragraph 144 would useful (e.g. Cerambycids).
153	Size of particles may affect the probability of pest survival	Category : TECHNICAL <b>(118) United States of America (22 Sep 2016 10:02 PM)</b> See US comment on paragraph 147
159	Risk is lower where the origin has had no agricultural exposure (e.g. certified bogs). <a href="#">Seeds</a> <a href="#">Peat may contain seeds</a> of plants as <del>pests are common pests</del> .	Category : TECHNICAL <b>(148) European Union (29 Sep 2016 4:03 PM)</b> The sentence was inappropriate: Whether any seeds are plants as pests depends on the country of destination, and whether the seeds are common depends on the country of origin.

159	Risk is lower where the origin has had no agricultural exposure (e.g. certified bogs). Seeds of plants as pests are common.	<i>Category : TECHNICAL</i> <b>(119) United States of America (22 Sep 2016 10:02 PM)</b> In general, any organics must be processed to exclude plant pests. Ranking as proposed here is misleading because there are situations that are not proposing this statement.
159	Risk is lower where the origin has had no agricultural exposure (e.g. certified bogs). <del>Seeds</del> <u>Peat may contain seeds</u> of plants as pests <del>are common</del> .	<i>Category : TECHNICAL</i> <b>(59) EPPO (21 Sep 2016 5:53 PM)</b> The sentence was inappropriate: Whether any seeds are plants as pests depends on the country of destination, and whether the seeds are common depends on the country of origin.
162	Risk depends on level of processing. <del>Seeds-Living moss (sphagnum) may contain seeds</del> of plants as pests <del>are common in living moss (sphagnum)</del> .	<i>Category : TECHNICAL</i> <b>(149) European Union (29 Sep 2016 4:05 PM)</b> The sentence was inappropriate: Whether any seeds are plants as pests depends on the country of destination, and whether the seeds are common depends on the country of origin.
162	Risk depends on level of processing. <del>Seeds-Living moss (sphagnum) may contain seeds</del> of plants as <del>pests are common in living moss (sphagnum)pests</del> .	<i>Category : TECHNICAL</i> <b>(60) EPPO (21 Sep 2016 5:53 PM)</b> The sentence was inappropriate: Whether any seeds are plants as pests depends on the country of destination, and whether the seeds are common depends on the country of origin.
172	Compost (e.g. <u>municipal or agricultural composted waste</u> , humus, leaf mould)	<i>Category : TECHNICAL</i> <b>(170) Canada (30 Sep 2016 9:18 PM)</b> Clarity on compost.
174	Risk depends on source and degree of processing or <del>fermentation</del> <u>fermentation seeds of plants as pests are common</u>	<i>Category : SUBSTANTIVE</i> <b>(4) Sri Lanka (22 Jul 2016 1:54 PM)</b>
175	<u>Soil</u>	<i>Category : SUBSTANTIVE</i> <b>(15) China (23 Jul 2016 6:17 AM)</b>
176	<u>Yes</u>	<i>Category : SUBSTANTIVE</i> <b>(16) China (23 Jul 2016 6:17 AM)</b>
177	<u>Risk can be reduced if treated</u>	<i>Category : SUBSTANTIVE</i> <b>(17) China (23 Jul 2016 6:17 AM)</b>
177	Risk can be reduced if <del>treated</del> <u>treated</u> . <u>Treatment should be sufficient to eliminate and micro-ore mmacro organism including the viability of plant seeds</u>	<i>Category : SUBSTANTIVE</i> <b>(5) Sri Lanka (22 Jul 2016 1:55 PM)</b>
178	Tree fern <del>slabs-slabs</del> <u>add to comment item: "Risk depends on source and treatment"</u>	<i>Category : TECHNICAL</i> <b>(128) Viet Nam (26 Sep 2016 10:23 AM)</b>
183	May include remains of undigested organic <del>material</del> <u>material</u> . <u>Vermicompost should be prepared early as required, and treated to eliminate any organism before using as a growing media</u>	<i>Category : SUBSTANTIVE</i> <b>(6) Sri Lanka (22 Jul 2016 1:57 PM)</b> may also include worms 9nematodes-non pest). What will be the solotion for this?
185	<b>ANNEX 2: Examples of growing media and measures that may effectively manage <u>the-its pest risk of the growing media associated in association</u> with plants for planting</b>	<i>Category : EDITORIAL</i> <b>(171) Canada (30 Sep 2016 9:19 PM)</b> Edit to provide clarity to the title

185	<b>ANNEX 2: Examples of growing media and measures that may effectively manage the pest risk of the growing media associated with plants for planting</b>	<i>Category : SUBSTANTIVE</i> <b>(120) United States of America (22 Sep 2016 10:03 PM)</b> Technical. Please provide references throughout Annex 2  Also, no explanation of the purpose of this annex.
199	Inert material <del>that is not capable of supporting post-growth (e.g. perlite)</del> such as <a href="#">perlite</a> , <a href="#">vermiculite</a>	<i>Category : TECHNICAL</i> <b>(121) United States of America (22 Sep 2016 10:03 PM)</b> This statement is true for many of these examples (paper, clay, etc.), so not needed here.
208	<b>APPENDIX 1: Examples of plants for planting in international movement and the growing media commonly associated with them</b>	<i>Category : SUBSTANTIVE</i> <b>(122) United States of America (22 Sep 2016 10:04 PM)</b> Technical. Please provide references throughout this appendix  Please provide purpose/explanation for this appendix
213	Water <a href="#">or water-based nutrient solution</a>	<i>Category : EDITORIAL</i> <b>(150) European Union (29 Sep 2016 4:06 PM)</b> For consistency with paragraphs 192, 212 and 214.
213	Water <a href="#">or water-based nutrient solution</a>	<i>Category : EDITORIAL</i> <b>(61) EPPO (21 Sep 2016 5:53 PM)</b> For consistency with paragraphs 192, 212 and 214.
214	Some plants may be grown from cuttings in water or in water-based nutrient solution, with or without synthetic growing <del>media-media</del> .	<i>Category : EDITORIAL</i> <b>(35) Thailand (30 Aug 2016 12:51 PM)</b>
220	Epiphytic plants, such as bromeliads and orchids, are often shipped in association with tree fern slabs, bark, wood, non-viable moss (sphagnum), volcanic cinder, rock and so forth. These materials are generally intended for support and ornamentation rather than being true growing media.	<i>Category : SUBSTANTIVE</i> <b>(7) Sri Lanka (22 Jul 2016 1:59 PM)</b> in some cases coconut husk is used to support the plants. This will impose considerable level of risk.
223	Rooted herbaceous cuttings are generally rooted <del>and moved</del> in soil-free growing media that may be contained in peat-pots or coco-pots. The roots are tender and the growing media cannot be removed without injuring the plants.	<i>Category : EDITORIAL</i> <b>(151) European Union (29 Sep 2016 4:07 PM)</b> It is now clearer ("and moved" is not necessary: see for example paragraphs 229 and 232).
223	Rooted herbaceous cuttings are generally rooted <del>and moved</del> in soil-free growing media that may be contained in peat-pots or coco-pots. The roots are tender and the growing media cannot be removed without injuring the plants.	<i>Category : EDITORIAL</i> <b>(62) EPPO (21 Sep 2016 5:53 PM)</b> Clearer ("and moved" is not necessary: see for example paragraphs 229 and 232).
226	Annuals and biennials are generally grown from seed in growing media and moved as rooted in growing media.	<i>Category : EDITORIAL</i> <b>(31) Thailand (30 Aug 2016 12:49 PM)</b>
229	The plants may be field-grown in soil, grown as containerized nursery stock, or grown as potted greenhouse plants in soil-free growing media.	<i>Category : EDITORIAL</i> <b>(32) Thailand (30 Aug 2016 12:51 PM)</b>
232	These young plants are generally rooted in soil or in soil-free growing media in containers or trays.	<i>Category : EDITORIAL</i> <b>(33) Thailand (30 Aug 2016 12:51 PM)</b>
237	<del>Soil or</del> none	<i>Category : SUBSTANTIVE</i> <b>(18) China (23 Jul 2016 6:19 AM)</b>

238	Bare root is a technique of arboriculture whereby a field-grown tree or shrub is dug up in order to put it into a dormant state. The nursery stock may be shaken to remove some of the soil, or it may be washed free from all soil and growing media. The size and root structure of the plant and the type of soil has a large impact on <del>the ability to remove whether soil can be removed</del> from the root system.	Category : EDITORIAL <b>(172) Canada (30 Sep 2016 9:21 PM)</b> Sentence edited for clarity
238	Bare root is a technique of arboriculture whereby a field-grown tree or shrub is dug <del>up in order to put it into</del> <u>be placed in</u> a dormant state. The nursery stock may be shaken to remove some of the soil, or it may be washed free from all soil and growing media. The size and root structure of the plant and the type of soil has a large impact on the ability to remove soil from the root system.	Category : EDITORIAL <b>(123) United States of America (22 Sep 2016 10:04 PM)</b> To clarify
240	<del>Soil</del>	Category : SUBSTANTIVE <b>(19) China (23 Jul 2016 6:19 AM)</b>
242	Trees and <del>shrubs with soil shrubs</del>	Category : SUBSTANTIVE <b>(20) China (23 Jul 2016 6:20 AM)</b>
243	<del>Soil</del>	Category : SUBSTANTIVE <b>(21) China (23 Jul 2016 6:20 AM)</b>
244	Older trees and shrubs, including specimen trees, are often moved in the nursery trade as dug trees or "ball and burlap". <del>This material includes a large amount of soil.</del>	Category : SUBSTANTIVE <b>(23) China (23 Jul 2016 6:21 AM)</b>
246	<del>Soil</del>	Category : SUBSTANTIVE <b>(22) China (23 Jul 2016 6:20 AM)</b>
247	Turf or grass sod contains a large amount of soil <del>and is a potential pathway for many soil pests</del>	Category : EDITORIAL <b>(124) United States of America (22 Sep 2016 10:05 PM)</b> This statement is true for many of these examples, so not needed here.
247	Turf or grass sod contains a large amount of soil and is a potential pathway for many soil pests.	Category : EDITORIAL <b>(34) Thailand (30 Aug 2016 12:51 PM)</b>
247	<del>Turf or grass sod contains a large amount of soil and is a potential pathway for many soil pests</del>	Category : SUBSTANTIVE <b>(24) China (23 Jul 2016 6:22 AM)</b>