Consolidated reconciliation report for review "2017 First Consultation: Draft Specification for Audit in the Phytosanitary Context"

**T** (Type) - B = Bullet, C = Comment, P = Proposed Change, R = Rating

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| Sequential number | Para | Text | T | Comment |
| 1 | G | (General Comment) | C | **Kenya** ISPM 31 gives guidance on sampling consignments but there is no guidance of field sampling. There is no standard document to be used by auditors to sample during audit. This standard should include a sampling guide to ensure uniformity in field audits.  *Category : SUBSTANTIVE* |
| 2 | G | (General Comment) | C | **Kenya** NPPOs should be guided to use the standard on focused Phytosanitary issues. A Phytosanitary audit should not be used assess quality standards. This will ensure that the audit is objective  *Category : TECHNICAL* |
| 3 | G | (General Comment) | C | **Guyana** Guyana accepts this draft specification in its entirety.  *Category : SUBSTANTIVE* |
| 4 | G | (General Comment) | C | **Lao People's Democratic Republic** Lao PDR has no comment on DRAFT SPECIFICATION FOR ISPM: Audit in the phytosanitary context (2015-003).  *Category : SUBSTANTIVE* |
| 5 | G | (General Comment) | C | **Kenya** Audits of quality and Laboratories will not be included in the standard.  *Category : TECHNICAL* |
| 6 | G | (General Comment) | C | **Tajikistan** I support the document as it is and I have no comments  *Category : SUBSTANTIVE* |
| 7 | G | (General Comment) | C | **Tajikistan** I support the document as it is and I have no comments  *Category : SUBSTANTIVE* |
| 8 | G | (General Comment) | C | **Colombia** Es necesario definir con mayor claridad el alcance de las auditorias propuestas en el borrador de especificación.  *Category : SUBSTANTIVE* |
| 9 | G | (General Comment) | C | **China** There is no need to formulate a new ISPM on audit.  1. It is difficult to adopt a unified standard to measure and normalize phytosanitary services of every member country of IPPC. The phytosanitary measures which formulate and adopt by member countries is different, because the diversities in incidences of pests, the pests of concern and the phytosanitary technology in different countries. Besides that, the adoption of phytosanitary laws and regulations and their cognitions are manifold. 2. "Audit in the phytosanitary context" is the audit of the implementation of the whole process of phytosanitary measures, which is not an isolated program, and should be carried out and run through in the process of phytosanitary measures. In fact, there are already standard existed and adopted in phytosanitary measures in each stage (or step), such as Determination of pest status in an area (ISPM 8), Guidelines for surveillance (ISPM 6), Diagnostic protocols for regulated pests (ISPM 27), Phytosanitary certificates (ISPM 12) and Guidelines for inspection (ISPM 23). For the existing standard involves or includes some contents of audit, the implementations of phytosanitary measures are reliable according to the related standards.  *Category : SUBSTANTIVE* |
| 10 | G | (General Comment) | C | **Singapore** Singapore is agreeable to the proposed specifications.  *Category : EDITORIAL* |
| 11 | G | (General Comment) | C | **South Africa** Request reason/s why an audit of laboratories is not included or should not be covered by this draft.  *Category : EDITORIAL* |
| 12 | G | (General Comment) | C | **Samoa** no further comments  *Category : SUBSTANTIVE* |
| 13 | G | (General Comment) | C | **Algeria** No comment  *Category : SUBSTANTIVE* |
| 14 | G | (General Comment) | C | **PPPO** No further comment. Agree with the content.  *Category : EDITORIAL* |
| 15 | G | (General Comment) | C | **OIRSA** Se debería de aclarar y mejorar la coherencia en el uso y compresión del términos de auditoria Fitosanitaria y posteriormente analizarlo para ser considerado un Proyecto de Norma Internacional; considerar las definiciones que utilizan las partes contratantes para fines fitosanitarios oficiales; en el sentido que la Auditorias Fitosanitaria seria para utilizarlas en: artículo reglamentado, al proceso de emisión del Certificado Fitosanitario, al control oficial, a la cuarentena, legislación fitosanitaria, lugar de producción, punto de control y demás.  *Category : SUBSTANTIVE* |
| 16 | G | (General Comment) | C | **Cuba**  Consideramos los aspectos que recoge el proyecto son correctos.  *Category : SUBSTANTIVE* |
| 17 | G | (General Comment) | C | **Samoa**  support and agreed to the draft speficication  *Category : SUBSTANTIVE* |
| 18 | G | (General Comment) | C | **South Africa**  Request reason/s why an audit of laboratories is not included or should not be covered by this draft.  *Category : SUBSTANTIVE* |
| Reason for the standard | | | | |
| 19 | 24 | National plant protection organizations (NPPOs) are increasingly using audits in the phytosanitary ~~context. In this regard, audit is the process of systematic examination of measures set out in phytosanitary regulations, in order~~ context to identify ~~non-compliance~~ weakness and ~~establish corrective mechanisms to ensure continuous improvement, thereby helping the NPPOs to prevent the spread~~ non-conformity and ~~introduction of pests of plants~~ establish or ~~plant products~~recommend corrective mechanisms. | P | **European Union** If the sentence were retained it should be the implementation of measures rather than the measures themselves that are audited.   The text is also improved to give examples of the sorts of audit which may be carried out, and remove some unnecessary wording. A definition of audit should be left to the development of the Standard (task 1).   Furthermore, ‘Non-compliance’ is a Glossary term reserved for consignments with a P.C.. In ISPM 36 (P4P) we used non-conformity for other associations.  *Category : SUBSTANTIVE* |
| 20 | 24 | National plant protection organizations (NPPOs) are increasingly using audits in the phytosanitary ~~context. In this regard, audit is the process of systematic examination of measures set out in phytosanitary regulations, in order~~ context to identify ~~non-compliance~~ weakness and ~~establish corrective mechanisms to ensure continuous improvement, thereby helping the NPPOs to prevent the spread~~ non-conformity and ~~introduction of pests of plants~~ establish or ~~plant products~~reccomend corrective mechanisms. | P | **EPPO** If the sentence were retained it should be the implementation of measures rather than the measures themselves that are audited.   The text is also improved to give examples of the sorts of audit which may be carried out, and remove some unnecessary wording. A definition of audit should be left to the development of the Standard (task 1).   Furthermore, ‘Non-compliance’ is a Glossary term reserved for consignments with a P.C.. In ISPM 36 (P4P) we used non-conformity for other associations.  *Category : SUBSTANTIVE* |
| 21 | 24 | National plant protection organizations (NPPOs) are increasingly using audits in the phytosanitary context. In this regard, audit is the process of systematic examination of measures set out in phytosanitary regulations, in order to identify non-compliance and establish corrective mechanisms to ensure continuous improvement, thereby helping the NPPOs to prevent the spread and introduction of pests of plants or plant products. | C | **Nicaragua** Nicaragua revisó y analizó el concepto de auditoría proporcionado por el Comité de Normas y esta de acuerdo con la implementación de este término.  *Category : TECHNICAL* |
| 22 | 25 | Audits are referenced in ~~most~~ many adopted ISPMs, and ~~are also~~ proposed as an element of several standards ~~that are~~ currently in the IPPC work plan (e.g. Specification 65 (*Authorization of entities other than national plant protection organizations to perform phytosanitary actions* (2014-002)). However, there is no standard that provides guidance to NPPOs specifically on conducting audits in the phytosanitary context. This proposed standard aims to secure a common approach to audits in the phytosanitary context, which will increase trust and understanding among contracting parties. | P | **European Union** Improvement to be more precise.  *Category : TECHNICAL* |
| 23 | 25 | Audits are referenced in ~~most~~ many adopted ISPMs, and ~~are also~~ proposed as an element of several standards ~~that are~~ currently in the IPPC work plan (e.g. Specification 65 (*Authorization of entities other than national plant protection organizations to perform phytosanitary actions* (2014-002)). However, there is no standard that provides guidance to NPPOs specifically on conducting audits in the phytosanitary context. This proposed standard aims to secure a common approach to audits in the phytosanitary context, which will increase trust and understanding among contracting parties. | P | **EPPO** Improvement to be more precise  *Category : TECHNICAL* |
| Scope | | | | |
| 24 | 27 | The standard will describe the essential elements of all uses of audit in the phytosanitary context, including audits of the implementation of phytosanitary measures, audits carried out by the NPPO of the importing country in the exporting country, and audits of entities other than NPPOs who are authorized to perform phytosanitary actions. Audits of laboratories and quality standards will not be included in the standard. | P | **Kenya**  *Category : SUBSTANTIVE* |
| 25 | 27 | The standard will describe the essential elements of all uses of audit in the phytosanitary context, including audits by the exporting NPPO of the implementation of phytosanitary ~~measures~~measures by entities in their country, audits of the export certification system carried out by the NPPO of the importing country in the exporting country, and audits of entities ~~other than NPPOs who are~~ that the NPPO has authorized to perform phytosanitary actions. The Standard will describe separately the elements needed for the different type of audits. Audits of laboratories will not be included in the standard. | P | **European Union** A clear distinction is needed between different type of audits, an audit by the importing country in the exporting country is clearly different from an audit by the exporting country in the exporting country.  *Category : TECHNICAL* |
| 26 | 27 | The standard will describe the essential elements of all uses of audit in the phytosanitary context, including audits of the implementation of phytosanitary measures, audits carried out by the NPPO of the importing country in the exporting country, and audits of entities other than NPPOs who are authorized to perform phytosanitary actions~~. Audits of laboratories will not be included in the standard~~. | P | **European Union** Laboratories should not be excluded from scope, and to do so would be incompatible with the “all” in the proposed first sentence of the scope.  *Category : SUBSTANTIVE* |
| 27 | 27 | The standard will describe the essential elements of all uses of audit ~~in~~ focusing on the ~~phytosanitary context, including audits of the~~ implementation of phytosanitary measures, audits carried out by the NPPO of the importing country in the exporting country, and audits of entities other than NPPOs who are authorized to perform phytosanitary actions. Audits of laboratories will not be included in the standard. | P | **Uruguay** Text deleted because phytosanitary context is a concept not very clear. Proposed wording clarifies the scope  *Category : TECHNICAL* |
| 28 | 27 | The standard will describe the essential elements of all uses of audit ~~in~~ focusing on the ~~phytosanitary context, including audits of the~~ implementation of phytosanitary measures, audits carried out by the NPPO of the importing country in the exporting country, and audits of entities other than NPPOs who are authorized to perform phytosanitary actions. Audits of laboratories will not be included in the standard. | P | **COSAVE** Text deleted because phytosanitary context is a not very clear concept, text proposed clarifies the scope.  *Category : TECHNICAL* |
| 29 | 27 | The standard will describe the essential elements of all uses of audit ~~in~~ focusing on the ~~phytosanitary context, including audits of the~~ implementation of phytosanitary measures, audits carried out by the NPPO of the importing country in the exporting country, and audits of entities other than NPPOs who are authorized to perform phytosanitary actions. Audits of laboratories will not be included in the standard. | P | **Brazil** Text deleted because phytosanitary context is a not very clear concept. Proposed text clarifies the scope.  *Category : TECHNICAL* |
| 30 | 27 | The standard will describe the essential elements of all uses of ~~audit in the phytosanitary context~~audit, ~~including~~ focusing on audits of the implementation of phytosanitary measures, audits carried out by the NPPO of the importing country in the exporting country, and audits of entities other than NPPOs who are authorized to perform phytosanitary actions. Audits of laboratories will not be included in the standard. | P | **Argentina** Text deleted because phytosanitary context is a not very clear concept, text proposed clarifies the scope.  *Category : TECHNICAL* |
| 31 | 27 | The standard will describe the essential elements of all uses of audit in the phytosanitary context, including audits of the implementation of phytosanitary measures, audits carried out by the NPPO of the importing country in the exporting country, and audits of entities other than NPPOs who are authorized to perform phytosanitary actions~~. Audits of laboratories will not be included in the standard~~. | P | **EPPO** Laboratories should not be excluded from scope, and to do so would be incompatible with the “all” in the proposed first sentence of the scope.  *Category : SUBSTANTIVE* |
| 32 | 27 | The standard will describe the essential elements of all uses of audit in the phytosanitary context, including audits by the exporting NPPO of the implementation of phytosanitary ~~measures~~measures by entities in their country, audits of the export certification system carried out by the NPPO of the importing country in the exporting country, and audits of entities ~~other than NPPOs who are~~ that the NPPO has authorized to perform phytosanitary actions. The Standard will describe separately the elements needed for the different type of audits. Audits of laboratories will not be included in the standard. | P | **EPPO** A clear distinction is needed between different type of audits, an audit by the importing country in the exporting country is clearly different from an audit by the exporting country in the exporting country.  *Category : TECHNICAL* |
| 33 | 27 | The standard will describe the essential elements of all uses of audit in the phytosanitary context, including audits of the implementation of phytosanitary measures, audits carried out by the NPPO of the importing country in the exporting country, and audits of entities other than NPPOs who are authorized to perform phytosanitary actions. Audits of laboratories which are not involved in the phytosanitary context will not be included in the standard. | P | **Japan** To clarify why audits of laboratories are not included in the standard  *Category : SUBSTANTIVE* |
| 34 | 27 | The standard will describe the essential elements of all uses of audit in the phytosanitary context, including audits of the implementation of phytosanitary measures, audits carried out by the NPPO of the importing country in the exporting country, and audits of entities other than NPPOs who are authorized to perform phytosanitary actions. ~~Audits of laboratories will not be included in the standard.~~ | P | **International Seed Federation** The view of ISF is that it would also be beneficial to provide guidance for laboratory audits.  *Category : SUBSTANTIVE* |
| 35 | 27 | The standard will describe the essential elements of all uses of audit in the phytosanitary context, including audits of the implementation of phytosanitary measures, audits carried out by the NPPO of the importing country in the exporting country, and audits of entities other than NPPOs who are authorized to perform phytosanitary actions. ~~Audits of laboratories will not be included in the standard.~~ | P | **Australia** Laboratories should be included in the scope of phytosanitary audits as they can be involved in phytosanitary processes. For example, clean plant health programs for nursery stock. As part of those audits labs are included. Labs perform diagnostics that certify pest freedom.  *Category : SUBSTANTIVE* |
| Purpose | | | | |
| 36 | 29 | The standard will provide guidance to NPPOs ~~on~~ and requirements for audits in the phytosanitary context~~, carried out to assess whether phytosanitary measures have been implemented successfully~~. It will enable a common understanding of the term “audit” and the responsibilities of ~~NPPOs~~ NPPOs, auditors and ~~auditors~~those audited, and it will provide procedures for planning audits, developing audit checklists, selecting and training auditors, carrying out audits and establishing audit frequencies. | P | **European Union** Text improved to make clear that the Standard should include requirements.  A sentence has also been deleted as neither fully correct nor fully comprehensive, and altogether not necessary, as it is better explained under Scope.  *Category : TECHNICAL* |
| 37 | 29 | The standard will provide guidance to NPPOs on audits in the phytosanitary context, carried out to assess whether phytosanitary measures have been implemented successfully. It will enable a common understanding of the term “audit” and the responsibilities of NPPOs and auditors, and it will provide procedures for planning audits, developing audit checklists, selecting and training auditors, carrying out audits and establishing audit frequencies. | C | **Kenya** The standard will also provide an independent assessment of a system by evaluating the capacity of the entity to comply with requirements as well as assist in identification of strengths, areas for improvement and the level of performance relative to the required standards  *Category : SUBSTANTIVE* |
| 38 | 29 | The standard will provide guidance to NPPOs on audits in the phytosanitary context, carried out to assess whether phytosanitary measures have been implemented successfully. It will enable a common understanding of the term “audit” and the responsibilities of NPPOs and auditors, and it will provide procedures for planning audits, developing audit checklists, selecting and training auditors, carrying out audits and establishing criteria for audit frequencies. | P | **Brazil** What should be established are not audit frequencies but criteria for audits frequencies.  *Category : TECHNICAL* |
| 39 | 29 | The standard will provide guidance to NPPOs on audits in the phytosanitary context, carried out to assess whether phytosanitary measures have been implemented successfully. It will enable a common understanding of the term “audit” and the responsibilities of NPPOs and auditors, and it will provide procedures for planning audits, developing audit checklists, selecting and training auditors, carrying out audits and establishing criteria for audit frequencies. | P | **Argentina** what should be established are not audit frequencies but criteria for audits frequencies.  *Category : TECHNICAL* |
| 40 | 29 | The standard will provide guidance to NPPOs ~~on~~ and requirements for audits in the phytosanitary context~~, carried out to assess whether phytosanitary measures have been implemented successfully~~. It will enable a common understanding of the term “audit” and the responsibilities of ~~NPPOs~~ NPPOs, auditors and ~~auditors~~those audited, and it will provide procedures for planning audits, developing audit checklists, selecting and training auditors, carrying out audits and establishing audit frequencies. | P | **EPPO** Text improved to make clear that the Standard should include requirements.   A sentence has also been deleted as neither fully correct nor fully comprehensive, and altogether not necessary, as it is better explained under Scope.  *Category : TECHNICAL* |
| 41 | 29 | The standard will provide guidance to NPPOs on audits in the phytosanitary context, carried out to assess whether phytosanitary measures have been implemented successfully. It will enable a common understanding of the term “audit” and the responsibilities of NPPOs and auditors, and it will provide procedures for planning audits, developing audit checklists, selecting and training auditors, carrying out ~~audits~~ audits, identifying the auditor's qualifications and duties and establishing audit frequencies. | P | **United States of America** To include this additional but important aspect  *Category : TECHNICAL* |
| 42 | 29 | The standard will provide guidance to NPPOs on audits in the phytosanitary context, carried out to assess whether phytosanitary measures have been implemented successfully. It will enable a common understanding of the term “audit” and the responsibilities of NPPOs and auditors, and it will provide procedures for planning audits, developing audit checklists, selecting and training auditors, carrying out audits and establishing criteria for audit frequencies. | P | **Uruguay** What should be established are not the audit frequencies, but criteria for audit frequencies  *Category : TECHNICAL* |
| 43 | 29 | The standard will provide guidance to NPPOs on audits in the phytosanitary context, carried out to assess whether phytosanitary measures have been implemented successfully. Audits can be used to determine if an NPPO (or authorised entities/industry participants) has implemented management systems that result in consistent application of effective phytosanitary measures. It will enable a common understanding of the term “audit” and the responsibilities of NPPOs and auditors, and it will provide procedures for planning audits, developing audit checklists, selecting and training auditors, carrying out audits and establishing audit frequencies. | P | **Australia** Necessary expansion on what constitutes successful implementation.  *Category : TECHNICAL* |
| 44 | 29 | The standard will provide guidance to NPPOs on audits in the phytosanitary context, carried out to assess whether phytosanitary measures have been implemented successfully. It will enable a common understanding of the term “audit” and the responsibilities of NPPOs and auditors, and it will provide procedures for planning audits, developing audit checklists, selecting and training auditors, carrying out audits, reporting audit findings, closing out audits and establishing audit frequencies. | P | **Australia** Also need guidance on reporting audit findings and closing audits.  *Category : SUBSTANTIVE* |
| 45 | 29 | The standard will provide guidance to NPPOs on audits in the phytosanitary context, carried out to assess whether phytosanitary measures have been implemented successfully. It will enable a common understanding of the term “audit” and the responsibilities of NPPOs and auditors, and it will provide procedures for planning audits, developing audit ~~checklists~~guidance tools, selecting and training auditors, carrying out audits and establishing audit frequencies. | P | **Australia** Checklists are one of several tools that are available to auditors.  *Category : TECHNICAL* |
| 46 | 29 | The standard will provide guidance to NPPOs on audits in the phytosanitary context, carried out to assess whether phytosanitary measures have been implemented successfully. It will enable a common understanding of the term “audit” and the responsibilities of NPPOs and auditors, and it will provide procedures for planning audits, developing audit checklists, selecting and training auditors, carrying out audits and establishing audit frequencies. There is a common confusion globally between the role of pre clearance and the role of audit. Audit checks the pathway , preclearance just checks the end product etc. | P | **Australia** There is a common confusion globally on the role of audit and the role of preclearance. Audit checks the pathway, preclearance just checks the end product etc.  *Category : SUBSTANTIVE* |
| 47 | 29 | The standard will provide guidance to NPPOs on audits in the phytosanitary context, carried out to assess whether phytosanitary measures have been implemented successfully. It will enable a common understanding of the term “audit” and the responsibilities of NPPOs and auditors, and it will provide procedures for planning audits, developing audit checklists, selecting and training auditors, carrying out audits and establishing criteria for audit frequencies. | P | **COSAVE** what should be established are not audit frequencies but criteria for audits frequencies.  *Category : TECHNICAL* |
| Tasks | | | | |
| 48 | 32 | Consider the use of “audit” and similar terms used in ISPMs, and suggest a definition for “audit” in the phytosanitary context, if appropriate.  (2) Consider whether visit to exporting country by the NPPO of the importing country in order to establish phytosanitary requirements is included in the standard. | P | **Japan** To clarify points of discussion for this standard  *Category : SUBSTANTIVE* |
| 49 | 32 | Consider the use of “audit” and similar terms used in ISPMs, and suggest a definition for “audit” in the phytosanitary context, if appropriate. | C | **Nicaragua** Nicaragua propone que al usar la definición del término "auditoría" que se encuentra descrito en el ítem Razón de la norma, este comentario ya no es aplicable.  *Category : EDITORIAL* |
| 50 | 32 | Consider the use of “audit” and similar terms used in ISPMs, and suggest a definition for “audit” in the phytosanitary context, if appropriate.  (3) Differentiate between audit in the phytosanitary context and the verification of compliance of consignments by the importing country in the exporting country as contained in ISPM 20 Annex 1. | P | **Australia** New task inline with proposed inclusion from paragraph [29].  *Category : SUBSTANTIVE* |
| 51 | 32 | Consider the use of “audit” and similar terms used in ISPMs, and suggest a definition for “audit” in the phytosanitary context, if appropriate.  (2) Consider the different types of audits being used by NPPOs and provide relevant examples. E.g. auditing prior to trade to gain/give assurance of implementation of measures, auditing of an NPPO’s phytosanitary certification system, auditing as part of authorisation/approval of treatment providers/ testing labs. May also be performed in the investigation of non-compliance notifications. | P | **Australia** There is a need for a task for the expert working group to consider guidance for different types of audit.  *Category : SUBSTANTIVE* |
| 52 | 33 | Consider existing standards and guidelines for audits developed by NPPOs, regional plant protection organizations and other international organizations (e.g. International Organization for Standardization (ISO)) that address the concept of audit and specify the understanding of that concept in the phytosanitary context. | P | **European Union** These organisations (e.g. ISO) do not necessarily address the concept in the phytosanitary context.  *Category : TECHNICAL* |
| 53 | 33 | Consider existing standards and guidelines for audits developed by NPPOs, regional plant protection organizations and other international organizations (e.g. International Organization for Standardization (ISO)) that address the concept of audit in the phytosanitary context.  [NEW TASK:] Describe, in the phytosanitary context, the various purposes, scopes and potential triggers for performing audits, in particular for system audits carried out by an NPPO with, and in the territory of, another NPPO. | P | **European Union** New task to be included.  *Category : SUBSTANTIVE* |
| 54 | 33 | Consider existing standards and guidelines for audits developed by NPPOs, regional plant protection organizations and other international organizations (e.g. International Organization for Standardization (ISO)) that address the concept of audit in the phytosanitary context.  [NEW TASK:] Describe, in the phytosanitary context, the various purposes, scopes and potential triggers for performing audits, in particular for systems audits carried out by an NPPO with, and in the territory of, another NPPO | P | **EPPO** New task to be included  *Category : SUBSTANTIVE* |
| 55 | 33 | Consider existing standards and guidelines for audits developed by NPPOs, regional plant protection organizations and other international organizations (e.g. International Organization for Standardization (ISO)) that address the concept of audit and specify the understanding of that concept in the phytosanitary context. | P | **EPPO** These organisations (e.g. ISO) do not necessarily address the concept in the phytosanitary context.  *Category : TECHNICAL* |
| 56 | 33 | Consider existing standards and guidelines for audits developed by NPPOs, regional plant protection organizations and other international organizations (e.g. International Organization for Standardization (ISO)) that address the concept of audit in the phytosanitary context. | C | **Nicaragua** Nicaragua esta de acuerdo en utilizar las normas y directrices de las ONPF, ORPF, NIMF y aquellas que permitan la facilitación del comercio en un contexto de la protección fitosanitaria de cada país.  *Category : TECHNICAL* |
| 57 | 34 | Develop guidance on how NPPOs, the entity being audited and the auditors should fulfil their responsibilities, considering separately an audit by the importing country in the exporting country and an audit by the exporting country in the exporting country. | P | **European Union** See EU (and EPPO) comment under 'Scope'.  *Category : TECHNICAL* |
| 58 | 34 | Develop guidance on how NPPOs, the entity being audited and the auditors should fulfil their responsibilities~~.~~. considering separately an audit by the importing country in the exporting country and an audit by the exporting country in the exporting country | P | **EPPO** See EPPO comment under 'Scope'  *Category : TECHNICAL* |
| 59 | 34 | Develop guidance on how NPPOs, the entity being audited and the auditors should fulfil their ~~responsibilities~~responsibilities considering the case of non-compliance indicated. | P | **Japan** It would be useful to explain the case of non-compliance indicated.  *Category : SUBSTANTIVE* |
| 60 | 34 | Develop guidance on how NPPOs, the entity being audited and the auditors should fulfil their responsibilities. | C | **Nicaragua** Nicaragua propone que se elabore una guía de auditoría para auditores fitosanitarios, la cual debe ser homolagada por todos los países.  *Category : TECHNICAL* |
| 61 | 34 | Develop guidance on how ~~NPPOs~~an NPPO, ~~the entity being audited~~ auditee, and independent auditor authorized by the ~~auditors should~~ NPPO fulfil their responsibilities. | P | **United States of America** For clarity  *Category : EDITORIAL* |
| 62 | 35 | Describe, in the phytosanitary context, criteria and procedures, as appropriate, for ~~setting up an audit system, including~~ planning audits, developing audit checklists, selecting auditors, carrying out audits and establishing audit frequencies, as well as the responsibility for financing audits. | P | **Uruguay** Criteria and procedures should not describe an audit system, but should describe audit actions or activities. Responsibilities for financing audits should also be described.  *Category : TECHNICAL* |
| 63 | 35 | Describe, in the phytosanitary context, criteria and procedures, as appropriate, for ~~setting up an audit system, including~~ planning audits, developing audit checklists, selecting auditors, carrying out audits and establishing audit frequencies, as well as the responsibility for financing audits. | P | **COSAVE** Criteria and procedures should not describe an audit system, but describe audit actions or activities. Responsibilities for financing audits should also be described.  *Category : TECHNICAL* |
| 64 | 35 | Describe, in the phytosanitary context, criteria and procedures, as appropriate, for ~~setting up an audit system, including~~ planning audits, developing audit checklists, selecting auditors, carrying out audits and establishing audit frequencies, as well as the responsibility for financing audits. | P | **Brazil** Criteria and procedures should not describe an audit system, but describe audit actions or activities. Responsibilities for financing audits should also be described.  *Category : TECHNICAL* |
| 65 | 35 | Describe, in the phytosanitary context, criteria and procedures, as appropriate, for ~~setting up an audit system, including~~ planning audits, developing audit checklists, selecting auditors, carrying out audits and establishing audit frequencies, as well as the responsibility for financing audits. | P | **Argentina** Criteria and procedures should not describe an audit system, but describe audit actions or activities. Responsibilities for financing audits should also be described  *Category : TECHNICAL* |
| 66 | 35 | Describe, in the phytosanitary context, criteria and procedures, as appropriate, for setting up an audit system, including planning audits, developing audit checklists, selecting auditors, carrying out audits and establishing audit frequencies. | C | **Nicaragua** Nicaragua propone que al desarrollar una guía para realizar estas auditorías, se debe definir los criterios, procedimientos, alcances, requisitos para la selección de los auditores, definir tiempo de realización de la auditoría, guía que debe ser homologada y adoptada para un mismo trato entre los países.  *Category : TECHNICAL* |
| 67 | 35 | Describe, in the phytosanitary context, criteria and procedures, as appropriate, for setting up an audit system, including planning audits, developing audit ~~checklists~~guidance tools, selecting auditors, carrying out audits, reporting audit findings, closing out audits and establishing audit frequencies. | P | **Australia** See previous comments in paragraph [29]  *Category : SUBSTANTIVE* |
| 68 | 36 | Describe the requirements for training auditors that would enable NPPOs (or entities authorized by them) to conduct audits. | C | **Nicaragua** Nicaragua propone que el comité de normas elabore un perfil de auditor y que este sea revisado por las ONPF para su adopción.  *Category : TECHNICAL* |
| 69 | 36 | Describe the requirements for training auditors that would enable NPPOs (or entities authorized by them) to conduct audits.  (7) Consider guidance around an NPPO maintaining the integrity of the audit system and ensure auditors are provided with procedures and have processes in place to manage conflicts of interest, confidentiality and how to deal with appeals and disputes to audit findings. | P | **Australia** A new task to incorporate guidance to cover conflict of interest, disputes and appeals to audits.  *Category : SUBSTANTIVE* |
| 70 | 36 | Describe the requirements for training auditors that would enable NPPOs (or entities authorized by them) to conduct audits.  (6) Consider recognition of equivalent auditing systems. A number of auditing systems (e.g. HACCP based system or audits conducted by other NPPOs) may have been implemented to address other regulatory or customer requirements. What should an NPPO consider when assessing equivalence? Recognition of equivalent audit systems should not diminish the responsibilities of an NPPO. NPPOs will still be responsible for monitoring/verifying outcomes of measures, and may wish to carry out joint audits to monitor performance of any recognised audit system. | P | **Australia** Additional task to consider the principle of equivalence to facilitate trade and meet audit requirements.  *Category : SUBSTANTIVE* |
| 71 | 36 | Describe the requirements for ~~training auditors~~ approving (or selecting auditors) that would enable NPPOs (or entities authorized by them) to conduct audits. | P | **Australia** A trained auditor isn’t necessarily a competent auditor or have sufficient/relevant experience and/or the required technical/scientific knowledge and skills(depending on the scope of the audit).  *Category : SUBSTANTIVE* |
| 72 | 37 | Consider whether the ISPM could affect in a specific way (positively or negatively) the protection of biodiversity and the environment. If this is the case, the impact should be identified, addressed and clarified in the draft ISPM. | C | **Nicaragua** Nicaragua considera que con la implementación de esta norma no se genera ningún impacto a la biodiversidad y al ambiente. Así mismo se recomienda al Comité de Normas que se apliquen los formatos o guías en vía electrónica a fin de evitar el uso de papel.  *Category : TECHNICAL* |
| 73 | 38 | Consider implementation of the ISPM by contracting parties and identify potential operational and technical implementation issues. Provide information and possible recommendations on these issues to the Standards Committee. | C | **Nicaragua** Nicaragua considera que el problema que se podría presentar es que no todos los países adopten esta norma.  *Category : EDITORIAL* |
| Expertise | | | | |
| 74 | 47 | An expert from ISO may be invited to ~~participate, as an invited expert,~~ participate in the expert working group meeting or meetings, or relevant parts of the meeting or meetings. | P | **Philippines**  *Category : EDITORIAL* |