

## 2018 FIRST CONSULTATION

1 July – 30 September 2018

### Compiled comments for Draft ISPM on Authorization of entities to perform phytosanitary actions (2014-002)

#### Summary of comments

Name	Summary
Benin	Accepté
Chad	Les observations sont faites d'une manière générales sur la forme
Croatia	After the consultation with relevant subject matter experts we agree agree with the comments made during regional workshop
Cuba	No hay comentarios al documento
European Union	Completed on 27 September 2018 by the European Commission on behalf of the European Union and its 28 Member States.
Korea, Republic of	Republic of Korea agrees with the comments made during APPPC Regional workshop.
Lao People's Democratic Republic	Lao PDR has agreed with APPPC as Regional comments.
Latvia	For internal LV discussions in progress only
OIRSA	Norma revisada e incorporado los comentarios.
Oman	No comment.
Peru	Completada
Singapore	Singapore also support the APPPC's submitted comments.
Trinidad and Tobago	Trinidad and Tobago is in agreement with the comments made during the 2018 IPPC Regional Workshop in the Caribbean.

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

FAO sequential number	Para	Text	T	Comment
1	G	(General Comment)	C	<b>Benin</b> Pas de commentaire <i>Category : TECHNICAL</i>
2	G	(General Comment)	C	<b>Guyana</b> Guyana has reviewed the draft standard and accepts its adoption. However, the alignment of national legislation to facilitate this standard is a potential significant implementation issue. <i>Category : SUBSTANTIVE</i>
3	G	(General Comment)	C	<b>Sri Lanka</b> Sri Lanka Accepts all comments made by APPPC on this standard <i>Category : SUBSTANTIVE</i>

4	G	(General Comment)	C	<p><b>Canada</b> Canada supports the draft ISPM - Authorization of entities to perform phytosanitary actions. Substantive, technical and editorial comments are provided for consideration. <i>Category : SUBSTANTIVE</i></p>
5	G	(General Comment)	C	<p><b>Antigua and Barbuda</b> Antigua and Barbuda endorses the comments made by CAHFSA. <i>Category : SUBSTANTIVE</i></p>
6	G	(General Comment)	C	<p><b>Peru</b> Peru shares with the final comments of COSAVE <i>Category : SUBSTANTIVE</i></p>
7	G	(General Comment)	C	<p><b>Trinidad and Tobago</b> Trinidad and Tobago is in agreement with the comments made during the 2018 IPPC Regional Workshop in the Caribbean.  <i>Category : SUBSTANTIVE</i></p>
8	G	(General Comment)	C	<p><b>Panama</b> Difference between auditing and supervision should be clarified throughout the standard, because both terms are used indistinctly and they are different actions. In addition it should be clarified if these actions should be included as examples of phytosanitary actions and therefore within the scope of this ISPM. Some countries questioned if these are phytosanitary actions. The Glossary definition of phytosanitary actions does not specifically mention supervision and auditing, but the definition of the term mentions only some examples of phytosanitary actions. Other countries understood that auditing and supervision would be covered under "actions undertaken to implement phytosanitary measures" and therefore within the scope of the standard. <i>Category : SUBSTANTIVE</i></p>
9	G	(General Comment)	C	<p><b>Russian Federation</b> The Russian Federation does not support this ISPM draft in general  Comments:  The system of quarantine phytosanitary control is a system providing not only phytosanitary safety of the territory of the country, but the safety phytosanitary trade between the countries. However, none of the private organizations that are knowingly focused to gain economic profit will not consider the issue of phytosanitary security of the country. Plant quarantine, which has become a part of business will not be able to provide an impartial judgement and often competent decision when considering the issue of import, transfer or export of products. Attempts to use the elements of the system proposed by this Standard have been made by the Dutch side. The study of this</p>

			<p>system proved its insolvency and bias. Removal of the state body from the system of phytosanitary control will serve as a basis for the import and distribution of quarantine, invasive and underinvestigated species and would invariably entail the abolition of the concept of "Plant Quarantine " because the meaning of the term itself is lost within this "new system ". The Russian Federation was not only opposed to considering the provisions of the Standard, but also considered it necessary to cease work on its provisions.</p> <p>Российская Федерация не поддерживает данный проект Стандарта МСФМ в целом. Комментарий: Система карантинного фитосанитарного контроля — это система, обеспечивающая не только фитосанитарную безопасность территории страны, но безопасный в фитосанитарном отношении товарооборот между странами. Вместе с тем ни одна из частных организаций, которая заведомо настроена получить экономическую прибыль не будет рассматривать вопрос о фитосанитарной безопасности страны. Карантин растений, ставший частью бизнеса, не сможет обеспечить беспристрастное, а зачастую и квалифицированное решение при рассмотрении вопроса о ввозе, перемещении или вывозе продукции. Попытки использования элементов, предлагаемой стандартом системы были предприняты голландской стороной. Изучение этой системы доказали ее несостоятельность и предвзятость. Отстранение государственного органа от системы фитосанитарного контроля будет служить основанием для ввоза и распространения карантинных, инвазивных и малоизученных видов и неизменно повлечет за собой ликвидацию самого понятия "карантин растений" ввиду потери смысла самого термина в рамках этой "новой системы". Российская Федерация выступает не только категорически против рассмотрения положений стандарта, но и считает необходимым прекратить работу над его положениями.</p> <p><i>Category : SUBSTANTIVE</i></p>
10	G	(General Comment)	<p>C <b>Armenia</b> Armenia is against this standard as: 1.such standard is a signal for private entities to ask governments and finally overtake NPPOs functions; 2.Standard is not written in accordance with specification; 3.We do not see the reasoning of such standard as there is nothing phytosanitary specific in this standard; 4.inspections and control surveys cannot be authorized; 5.it is not acceptable to authorize phytosanitary certification related activities to private sector such as inspections or checks for issuance of phytosanitary certificate, so we could accept</p>

				certificates with confidence as dependable document (as we agreed in Convention). Otherwise confidence about reliable certification system is lost if so important tasks authorized away to private sector. Convention encompass this aspect of reliability; 6.It contradicts with some related aspects in other approved standards. <i>Category : SUBSTANTIVE</i>
11	G	(General Comment)	C	<b>Belarus</b> The draft standard is not supported by the Republic of Belarus. The Standard can not be relevant for the Republic of Belarus, since the legislative framework does not provide for the possibility of empowerment an entities, other than the NPPO of Belarus, to perform phytosanitary activities listed in the draft Standard. <i>Category : SUBSTANTIVE</i>
12	G	(General Comment)	C	<b>Philippines</b> We agree with the comments made during the APPPC Regional Workshop. <i>Category : SUBSTANTIVE</i>
13	G	(General Comment)	C	<b>Australia</b> An Authorized entity may be an individual who is trained and assessed by the NPPO before being approved. These individuals would not create their own instructional material or management system. Nor would they have 'personnel' themselves. We propose a separate section relevant to individuals as an authorised entity. <i>Category : TECHNICAL</i>
14	G	(General Comment)	C	<b>Sri Lanka</b> There may be implementation issues in some countries. These standards may be a ground for the external parties (to NPPO) to urge NPPO to implement such standards in their countries (opportunistic stakeholders/ political influences). If the country's NPPO does not have a capacity to implement such systems, existence of these type of blanket recommendations will harm to integrity of the phytosanitary system in those countries <i>Category : SUBSTANTIVE</i>
15	G	(General Comment)	C	<b>Viet Nam</b> 1. The Implementation and guidance material to supplement the ISPM will be critical for the development of systems with integrity. Such material should underscore the need for culture change, the challenges of dealing with conflicts of interest. It should also include a number of case studies to demonstrate how a delegated system and its elements can be established. 2. It should be mentioned that NPPO is accountable for phytosanitary actions conducted by authorized entities. 3. Suggest to include a recognised transition phase for the establishment of any new entity which specifies how non conformities will be managed. 4. Suggest a Performance Based Verification (PBV) system which is performance and outcome based. In terms of managing non-conformity, suggest to also include a

				<p>requirement for increased audits as an option.</p> <p>5. Potential implementation issue: Define and manage conflict of interest. In implementing a system it will be important to articulate potential conflicts of interest and how they are managed. Conflicts of interest may include conflicts with other Government Agencies in the samPotential implementation issue:</p> <p>6. Section 2 "Criteria for Eligibility of Entities" is key to the integrity of any systems developed according to this ISPM. The text is reasonable and flexible but how countries choose to operate and implement the system is where concern of whether the system delivers the desired outcome potentially lies.e country.</p> <p>7. Development of an authorisation process/programme is required - this can be done at NPPO level to ensure fit for purpose within its own regulatory system.</p> <p>8. Clarification is needed for NPPO delegation of responsibility, how far it can delegate? how many levels - if NPPO delegate to one organisation &amp; the organisation delegates to another agency - how far does this goes?</p> <p>9. It is important that the standard is robust, all entities taking phytosanitary actions can deliver the same outcome, and all countries can meet the same level of integrity for their exported commodities. Therefore the standard should be the same any entities (private or public).</p> <p>10. The overall objective of the ISPM should be to deliver a high standard of plant health and results in phytosanitary systems which consistently approve safe compliant plant products. This standard should be met by achieving outcomes. The integrity of any systems established under this ISPM must be based on all parties demonstrating compliance (i.e. meeting the requirements) and which are transparently demonstrated to the confidence of the regulatory body.</p> <p>11. The Implementation and guidance material to supplement the ISPM will be critical for the development of systems with integrity. Such material should underscore the need for culture change, the challenges of dealing with conflicts of interest. It should also include a number of case studies to demonstrate how a delegated system and its elements can be established</p> <p>12. Add Destination of entities in ISPM 5 to clarify</p> <p>13. Clarification is needed for NPPO delegation of responsibility <i>Category : SUBSTANTIVE</i></p>
16	G	(General Comment)	C	<p><b>Korea, Republic of</b> Republic of Korea agrees with the comments made during APPPC Regional workshop. <i>Category : SUBSTANTIVE</i></p>
17	G	(General Comment)	C	<p><b>PPPO</b> We agree with the comments made during the regional workshop <i>Category : SUBSTANTIVE</i></p>

18	G	(General Comment)	<p>C <b>Saint Kitts And Nevis</b>                  St.Kitts and Nevis is in agreement that entities providing phyto sanitary services for the NPPO should be authorized. This activity is important for efficacy and harmonization of phyto sanitary measures. There is need to consider the extent of implementation (capacity) and the available resources.</p> <p>Authorized bodies should be allowed to decide on and advise NPPO on pest status of an area i.e. declare an area pest free, outbreak, etc, or in conjunction with the NPPO.                  The information should be the property of the NPPO, ( not the Contracted Party)and cannot be used by anyone else without permission of the NPPO</p> <p><i>Category : SUBSTANTIVE</i></p>
19	G	(General Comment)	<p>C <b>Bahrain</b>                  Paragraph no. 99                  "Roles and responsibilities of entities authorized to audit or supervise"</p> <p>The standard stated that NPPO shall audit the authorized entities, the standard also stated that the NPPO can mandate another entity to carry out the audit on the authorized entities on behalf of the NPPO.                  Comment:                  The standard does not include any criteria for eligibility of AUDITING entities                  The criteria should also include responsibilities of the NPPO towards the auditing entity. Including how the NPPO will audit the auditing entity.                  If the NPPO can authorized an entity to audit another authorized entity, the NPPO should also has clear program on how it will audit the auditing entity.                  The NPPO should audit the auditing entity which is authorized by the NPPO to audit the authorized entity to carry out the phytosanitary actions and it will be a series of auditing.                  It will not ease the work of the NPPO. Because the NPPO should audit the auditing entity by the end</p> <p><i>Category : TECHNICAL</i></p>
20	G	(General Comment)	<p>C <b>Bahrain</b>                  Paragraph no. 27                  "Scope"</p> <p>The scope of this standard stated that it provides a framework that enables NPPOs to authorize private entities to perform specific phytosanitary actions associated with import, domestic</p>

				<p>and export systems on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. This standard does not cover the issuance of phytosanitary certificates; these are issued by authorized public officers only.</p> <p>Comment:                  Issuance of phytosanitary certificates is the last step of any export system in the addition to the phytosanitary security. It depends on all previous steps like sampling, inspection and testing which may be carried out by authorized entity.                  There is a need for addressing the integrating the first steps of export system that been carried out by the authorized entity with the last step that been carried out by the public authorized officers (issuing the certificate) in one system.                  It should also clarify when the public authorized officer have the authority not to complete the process depending on doubts in the actions carried out by the authorized entity.                  The phytosanitary security also should be addressed. If sampling, inspection and testing will be carried out by the entity, and the phytosanitary certificate will be issued by the public authorized officer. Who will be responsible for the phytosanitary security of a consignment after issuing the certificate? The authorized entity or the NPPO?</p> <p><i>Category : TECHNICAL</i></p>
21	G	(General Comment)	C	<p><b>Botswana</b>                  no comment  <i>Category : TECHNICAL</i></p>
22	G	(General Comment)	C	<p><b>EPPO</b>                  The Standard needs to cover small companies for single actions (e.g. tree felling and disposal in an outbreak situation) and individual persons. It is currently too elaborate for these purposes in relation to especially the "Development of an authorization program", "Eligibility of Entities" or "responsibilities of the NPPOs", these sections are too strictly predetermined and restrict, in part, a fast ability to act.                  The Standard needs separate sections on the requirements for private and public entities, and the Standard also needs to cover individuals.</p> <p><i>Category : SUBSTANTIVE</i></p>
23	G	(General Comment)	C	<p><b>EPPO</b>                  Legal advice should be sought during development of this Standard on what actions may be delegated to authorized entities, within the terms of Article V of the IPPC and in particular the expression "under the authority of".  <i>Category : SUBSTANTIVE</i></p>
24	G	(General Comment)	C	<p><b>EPPO</b>                  This is a complex and difficult question and there is a need for international discussion of the risks, costs and benefits of</p>

				authorization of entities for different actions and exchange of experiences (positive and negative), in parallel with the development of this Standard. <i>Category : SUBSTANTIVE</i>
25	G	(General Comment)	C	<b>New Zealand</b> New Zealand agrees with the comments made at the APPPC regional workshop. <i>Category : SUBSTANTIVE</i>
26	G	(General Comment)	C	<b>Sierra Leone</b> Sierra Leone agrees to the comment made during the Africa regional workshop <i>Category : SUBSTANTIVE</i>
27	G	(General Comment)	C	<b>European Union</b> Legal advice should be sought during the SPG 2018 discussion on the nature of the phytosanitary actions which may be delegated to authorised entities and which entities may be authorized to perform phytosanitary actions.  The outcome should be taken into account in the development of the standard.  <i>Category : SUBSTANTIVE</i>
28	G	(General Comment)	C	<b>European Union</b> Authorization is a complex and challenging concept and there is a lack of common understanding globally on what it means and how it can be addressed in an ISPM. We believe there would be value in having a discussion between contracting parties with the aim to reach a common understanding which will then aid the development of the standard. The SPG (9 – 11 October 2018) meeting would provide a good forum for such discussion and we believe that key points to cover should include:  a) exchange of views regarding the risks and benefits of authorisation of entities, b) positive and negative experiences of authorisation, c) the roles of private and public entities (both governmental and non-governmental).  Legal advice is also needed on what NPPO tasks/responsibilities can be delegated to authorised entities.  The Standard needs separate sections on the requirements of authorization for the public, private and non-governmental sectors. (please take a look at the standard specification points 4 and 5).  There are very strong links between this draft standard and the draft standard on 'Audits in the phytosanitary context' and therefore there may be benefits in developing the draft standard

				on 'audit in the phytosanitary context' as soon as possible. <i>Category : SUBSTANTIVE</i>
29	G	(General Comment)	C	<b>PPPO</b> No amendment on this draft <i>Category : EDITORIAL</i>
30	G	(General Comment)	C	<b>NEPPO</b> I agree with the comments made during NEPPO regional workshop <i>Category : SUBSTANTIVE</i>
31	G	(General Comment)	C	<b>Libya</b> Not acceptable but we need to strengthen and raise abilities NPPO <i>Category : TECHNICAL</i>
32	G	(General Comment)	C	<b>Iraq</b> Iraq reviewed the drafts and has no comments <i>Category : TECHNICAL</i>
33	G	(General Comment)	C	<b>South Africa</b> The National Plant Protection Organisation of South Africa (NPPOZA) endorse the comments from the regional workshop <i>Category : SUBSTANTIVE</i>
34	G	(General Comment)	C	<b>Caribbean Agricultural Health and Food Safety Agency</b> This draft ISPM is an important guide for NPPOs that may find some of their operational activities being handled by private sector entities. <i>Category : SUBSTANTIVE</i>
35	G	(General Comment)	C	<b>Mozambique</b> Lack of legal framework in Africa may affect the implementation of this Standard <i>Category : TECHNICAL</i>
36	G	(General Comment)	C	<b>Algeria</b> No comment <i>Category : SUBSTANTIVE</i>
37	G	(General Comment)	C	<b>Zambia</b> Apart from Paragraph 125 under Chapter 6, the rest of the Draft ISPM is fine. <i>Category : SUBSTANTIVE</i>
38	G	(General Comment)	C	<b>Zambia</b> 1. Paragraph 125 under Chapter 6; a suspended authorized entity should never carry out any phytosanitary actions pending findings of investigations that led to the suspension and only resume if such a suspension is lifted. Allowing a suspended authorized entity to carry out phytosanitary actions would erroneous. <i>Category : TECHNICAL</i>
39	G	(General Comment)	C	<b>Lao People's Democratic Republic</b> Lao PDR has agreed with APPPC as Regional comments. <i>Category : TECHNICAL</i>

40	G	(General Comment)	C	<p><b>Argentina</b> We request the Steward to clarify differences between the concepts of supervision and audit throughout the text. <i>Category : TECHNICAL</i></p>
41	G	(General Comment)	C	<p><b>United States of America</b> The United States of America support development of this ISPM. <i>Category : SUBSTANTIVE</i></p>
42	G	(General Comment)	C	<p><b>New Zealand</b> 1. Verification and audit. Suggest to consider recognition of systems already in place to verify technical areas and the requirement for appropriate accreditation of key entities in the accreditation process e.g. Jasanz and ISTA. 2. Audit vs supervision. Supervision is used throughout the text. Worth defining the term and differentiate it from audit and verification. <i>Category : SUBSTANTIVE</i></p>
43	G	(General Comment)	C	<p><b>New Zealand</b> 1. The Implementation and guidance material to supplement the ISPM will be critical for the development of systems with integrity. Such material should underscore the need for culture change, the challenges of dealing with conflicts of interest. It should also include a number of case studies to demonstrate how a delegated system and its elements can be established. 2. It should be mentioned that NPPO is accountable for phytosanitary actions conducted by authorized entities. 3. Suggest to include a recognised transition phase for the establishment of any new entity which specifies how non conformities will be managed. 4. Suggest a Performance Based Verification (PBV) system which is performance and outcome based. In terms of managing non-conformity, suggest to also include a requirement for increased audits as an option. 5. Potential implementation issue: Define and manage conflict of interest. In implementing a system it will be important to articulate potential conflicts of interest and how they are managed. Conflicts of interest may include conflicts with other Government Agencies in the samPotential implementation issue: 6. Section 2 "Criteria for Eligibility of Entities" is key to the integrity of any systems developed according to this ISPM. The text is reasonable and flexible but how countries choose to operate and implement the system is where concern of whether the system delivers the desired outcome potentially lies.e country. 7. Development of an authorisation process/programme is required - this can be done at NPPO level to ensure fit for purpose within its own regulatory system. 8. Clarification is needed for NPPO delegation of responsibility, how far it can delegate? how many levels - if NPPO delegate to</p>

			<p>one organisation &amp; the organisation delegates to another agency - how far does this goes?</p> <p>9. It is important that the standard is robust, all entities taking phytosanitary actions can deliver the same outcome, and all countries can meet the same level of integrity for their exported commodities. Therefore the standard should be the same any entities (private or public).</p> <p>10. The overall objective of the ISPM should be to deliver a high standard of plant health and results in phytosanitary systems which consistently approve safe compliant plant products. This standard should be met by achieving outcomes. The integrity of any systems established under this ISPM must be based on all parties demonstrating compliance (i.e. meeting the requirements) and which are transparently demonstrated to the confidence of the regulatory body.</p> <p><i>Category : SUBSTANTIVE</i></p>
44	G	(General Comment)	<p>C <b>APPPC</b> (99) New Zealand (7 Sep 2018 3:04 AM) Suggest to include a recognised transition phase for the establishment of any new entity which specifies how non conformities will be managed. Suggest a Performance Based Verification (PBV) system which is performance and outcome based. In terms of managing non-conformity, suggest to also include a requirement for increased audits as an option. (94) New Zealand (7 Sep 2018 1:45 AM) Clarification is needed for NPPO delegation of responsibility, how far it can delegate? how many levels?</p> <p><i>Category : TECHNICAL</i></p>
45	G	(General Comment)	<p>C <b>APPPC</b> Category : SUBSTANTIVE (147) APPPC (11 Sep 2018 5:41 AM) 1. The Implementation and guidance material to supplement the ISPM will be critical for the development of systems with integrity. Such material should underscore the need for culture change, the challenges of dealing with conflicts of interest. It should also include a number of case studies to demonstrate how a delegated system and its elements can be established. 2. It should be mentioned that NPPO is accountable for phytosanitary actions conducted by authorized entities. 3. Suggest to include a recognised transition phase for the establishment of any new entity which specifies how non conformities will be managed. 4. Suggest a Performance Based Verification (PBV) system which is performance and outcome based. In terms of managing non-conformity, suggest to also include a</p>

			<p>requirement for increased audits as an option.</p> <p>5. Potential implementation issue: Define and manage conflict of interest. In implementing a system it will be important to articulate potential conflicts of interest and how they are managed. Conflicts of interest may include conflicts with other Government Agencies in the samPotential implementation issue:</p> <p>6. Section 2 "Criteria for Eligibility of Entities" is key to the integrity of any systems developed according to this ISPM. The text is reasonable and flexible but how countries choose to operate and implement the system is where concern of whether the system delivers the desired outcome potentially lies.e country.</p> <p>7. Development of an authorisation process/programme is required - this can be done at NPPO level to ensure fit for purpose within its own regulatory system.</p> <p>8. Clarification is needed for NPPO delegation of responsibility, how far it can delegate? how many levels - if NPPO delegate to one organisation &amp; the organisation delegates to another agency - how far does this goes?</p> <p>9. It is important that the standard is robust, all entities taking phytosanitary actions can deliver the same outcome, and all countries can meet the same level of integrity for their exported commodities. Therefore the standard should be the same any entities (private or public).</p> <p>10. The overall objective of the ISPM should be to deliver a high standard of plant health and results in phytosanitary systems which consistently approve safe compliant plant products. This standard should be met by achieving outcomes. The integrity of any systems established under this ISPM must be based on all parties demonstrating compliance (i.e. meeting the requirements) and which are transparently demonstrated to the confidence of the regulatory body.</p> <p>(100) New Zealand (7 Sep 2018 5:35 AM) The Implementation and guidance material to supplement the ISPM will be critical for the development of systems with integrity. Such material should underscore the need for culture change, the challenges of dealing with conflicts of interest. It should also include a number of case studies to demonstrate how a delegated system and its elements can be established.</p> <p>(142) Korea, Republic of (10 Sep 2018 9:41 AM) It should be mentioned that NPPO is responsible for phytosanitary actions conducted by authorized entities.</p> <p>(98) New Zealand (7 Sep 2018 2:58 AM) Verification and audit. Suggest to consider recognition of systems already in place to verify technical areas (- e.g. ISO accreditation ) and the requirement for appropriate accreditation of key entities in the accreditation process e.g. Jasanz and ISTA. Audit vs supervision. Supervision is used throughout the text.</p>
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			<p>Worth defining the term and differentiate it from audit and verification.                  (97) New Zealand (7 Sep 2018 2:53 AM)                  Potential implementation issue:                  Define and manage conflict of interest. In implementing a system it will be important to articulate potential conflicts of interest and how they are managed. Conflicts of interest may include conflicts with other Government Agencies in the same country.                  (96) New Zealand (7 Sep 2018 2:47 AM)                  Potential implementation issue:                  Section 2 "Criteria for Eligibility of Entities" is key to the integrity of any systems developed according to this ISPM. The text is reasonable and flexible but how countries choose to operate and implement the system is where concern of whether the system delivers the desired outcome potentially lies.                  (95) New Zealand (7 Sep 2018 1:48 AM)                  Development of an authorisation process/programme is required - this can be done at NPPO level to ensure fit for purpose within its own regulatory system.                  (93) New Zealand (7 Sep 2018 1:42 AM)                  It is important that the standard is robust, all entities taking phytosanitary actions can deliver the same outcome, and all countries can meet the same level of integrity for their exported commodities. Therefore the standard should be the same any entities (private or public).                  (92) New Zealand (6 Sep 2018 7:09 AM)                  The overall objective of the ISPM should be to deliver a high standard of plant health and results in phytosanitary systems which consistently approve safe compliant plant products. This standard should be met by achieving outcomes. The integrity of any systems established under this ISPM must be based on all parties demonstrating compliance (i.e. meeting the requirements) and which are transparently demonstrated to the confidence of the regulatory body.                  Category : SUBSTANTIVE                  (22) Malaysia (21 Aug 2018 4:57 AM)                  Malaysia has reviewed and accepted the draft. Malaysia will evaluate the implementation of this draft ISPM as it progress with time.</p>
46	G	(General Comment)	<p><i>Category : SUBSTANTIVE</i></p> <p><b>C Jamaica</b>                  Jamaica (16 Sep 2018 6:01 PM)                  Standard is needed and gives good guidance and control to NPPO's in authorizing entities to perform phytosanitary actions.</p>

				There is need to consider the extent of implementation capacity and the availability of resources in developing countries. The alignment of National legislation to facilitate this standard will be a significant implementation issue. <i>Category : SUBSTANTIVE</i>
47	G	(General Comment)	C	<b>NEPPO</b> The authorization should be allowed by the national phytosanitary law. <i>Category : SUBSTANTIVE</i>
48	G	(General Comment)	C	<b>Egypt</b> there are too many editorial comments need to be considered like spaces between to words <i>Category : EDITORIAL</i>
49	G	(General Comment)	C	<b>Namibia</b> we agree with the comments <i>Category : SUBSTANTIVE</i>
50	G	(General Comment)	C	<b>Malawi</b> We agree with Comments <i>Category : SUBSTANTIVE</i>
51	G	(General Comment)	C	<b>IPPC Regional Workshop Africa</b> Would like to request for examples for other nonconformity <i>Category : SUBSTANTIVE</i>
52	G	(General Comment)	C	<b>IPPC Regional Workshop Africa</b> Another examples of nonconformity should be given <i>Category : SUBSTANTIVE</i>
53	G	(General Comment)	C	<b>IPPC Regional Workshop Africa</b> Critical Non conformity examples to be given <i>Category : SUBSTANTIVE</i>
54	G	(General Comment)	C	<b>IPPC Regional Workshop Africa</b> Need to give examples of other non-conformity for clarity <i>Category : TECHNICAL</i>
55	G	(General Comment)	C	<b>IPPC Regional Workshop Africa</b> Need to give examples of critical non conformity for clarity <i>Category : TECHNICAL</i>
56	G	(General Comment)	C	<b>Malawi</b> We accept the draft ISPM <i>Category : SUBSTANTIVE</i>
57	G	(General Comment)	C	<b>COSAVE</b> We request the Steward to clarify differences between the concepts of supervision and audit throughout the text.  <i>Category : TECHNICAL</i>
58	G	(General Comment)	C	<b>Uruguay</b> We request the steward to clarify differences between the concepts of supervision and audit throughout the text. <i>Category : TECHNICAL</i>

59	G	(General Comment)	C	<p><b>Philippines</b> Please provide a clearer definition of "entity"; we propose to use the term Quarantine Treatment Providers (QTP) to mean individuals, agencies, etc. authorized by the NPPO to carry out phytosanitary actions on its behalf. <i>Category : SUBSTANTIVE</i></p>
60	G	(General Comment)	C	<p><b>Costa Rica</b> Difference between auditing and supervision should be clarified throughout the standard, because both terms are used indistinctly and they are different actions. In addition it should be clarified if these actions should be included as examples of phytosanitary actions and therefore within the scope of this ISPM. Some counties questioned if these are phytosanitary actions. The Glossary definition of phytosanitary actions does not specifically mention supervision and auditing, but the definition of the term mentions only some examples of phytosanitary actions. Other countries understood that auditing and supervision would be covered under "actions undertaken to implement phytosanitary measures" and therefore within the scope of the standard. <i>Category : SUBSTANTIVE</i></p>
61	G	(General Comment)	C	<p><b>Kenya</b> Potential Implementation issues: Fixing of costs-whereas NPPO may charge minimal fee as per the relevant regulations, private entities may push for higher profits leading to high costs of authorized services. There is need for the government to regulate the charges so that the industry is not forced to evade the authorized service providers. Moreover, the government may need to subsidize the initiate investments needed by the authorized private entities for purposes of price stabilization <i>Category : TECHNICAL</i></p>
62	G	(General Comment)	C	<p><b>Kenya</b> Section 5.2 Need to give examples of other non-conformity for clarity <i>Category : TECHNICAL</i></p>
63	G	(General Comment)	C	<p><b>Kenya</b> Section 5.1 <i>Category : TECHNICAL</i></p>
64	G	(General Comment)	C	<p><b>Kenya</b> Need to give examples of critical non-conformity for clarity <i>Category : TECHNICAL</i></p>
65	G	(General Comment)	C	<p><b>South Africa</b> NPPOZA suggest that the roles and responsibility of auditing should remain with the NPPO. <i>Category : SUBSTANTIVE</i></p>
66	G	(General Comment)	C	<p><b>Chile</b> Chile support and agrees with comments of COSAVE <i>Category : TECHNICAL</i></p>

67	G	(General Comment)	C	<b>Brazil</b> Brazil supports COSAVE's comments. <i>Category : SUBSTANTIVE</i>
68	G	(General Comment)	C	<b>Venezuela</b> Una Vez realizada la revisión técnica, Venezuela no tiene ninguna objeción, por tanto manifestamos nuestro acuerdo con la propuesta <i>Category : TECHNICAL</i>
69	G	(General Comment)	C	<b>Malawi</b> No comment <i>Category : SUBSTANTIVE</i>
70	G	(General Comment)	C	<b>Lao People's Democratic Republic</b> So far no comments for Lao PDR. <i>Category : TECHNICAL</i>
71	G	(General Comment)	C	<b>Argentina</b> Equipment should be translated into Spanish as "equipamiento" (paragraph 45 and 65). <i>Category : TRANSLATION</i>
72	G	(General Comment)	C	<b>Uruguay</b> "Equipment" should be translated into Spanish as "Equipamiento" (paragraphs 45 and 65) <i>Category : TRANSLATION</i>
73	G	(General Comment)	C	<b>Malaysia</b> Malaysia has reviewed and accepted the draft. Malaysia will evaluate the implementation of this draft ISPM as it progress with time. <i>Category : SUBSTANTIVE</i>
74	G	(General Comment)	C	<b>Peru</b> Peru shares the comments made by COSAVE <i>Category : SUBSTANTIVE</i>
75	G	(General Comment)	C	<b>Burkina Faso</b> Les préoccupations sont celles relatives au suivi de ces organismes à se maintenir dans le respect strict-du niveau requis pour réaliser cette mission <i>Category : TECHNICAL</i>
76	G	(General Comment)	C	<b>Indonesia</b> Indonesia propose to make little change on the title i.e. "Authorization of entities to perform phytosanitary action" become "Authorization of entities to perform phytosanitary measures" <i>Category : EDITORIAL</i>
77	G	(General Comment)	C	<b>Indonesia</b> Indonesia would like to add: -List of equipment and material including vehicles owned by authorized entity under section 3.2 Roles and responsibility of the authorized entity <i>Category : TECHNICAL</i>

78	G	(General Comment)	C	<p><b>COSAVE</b> Equipment should be translated into Spanish as "equipamiento" (paragraph 45 and 65). <i>Category : TRANSLATION</i></p>
79	G	(General Comment)	C	<p><b>OIRSA</b> Cambiar en toda la norma: el término "emprender" por "ejecutar" emprender acciones fitosanitarias por ejecutar acciones fitosanitarias. Cambiar "procedimiento normaliza de actuación por procedimiento de operación normado" Se considera que es el término más adecuadas.  <i>Category : EDITORIAL</i></p>
80	G	(General Comment)	C	<p><b>OIRSA</b> El borrador está dirigido a ofrecer un marco para la autorización de entidades para emprender acciones fitosanitarias, pero ¿cómo se garantizaría el cumplimiento de las funciones y responsabilidades inherentes de la ONPF, si el borrador plantea la posibilidad de externalizar la auditoría y supervisión a una "Entidad Distinta a la ONPF"; pero no establece la manera en que la ONPF le daría seguimiento y evaluaría a esas "Entidades autorizadas para auditar o supervisar"?</p> <ul style="list-style-type: none"> <li>• El párrafo 76 (llevar a cabo auditorías periódicas de la entidad autorizada para verificar que cumple los requisitos del programa de autorizaciones de la ONPF), establece esta como una de las funciones y responsabilidades de la ONPF, pero no indica que la ONPF podrá externalizar esta su responsabilidad a una Entidad Distinta a la ONPF. En tal caso, debería ser indicado aquí.</li> <li>• Es en el párrafo 98 ubicado dentro de las funciones y responsabilidades de la entidad autorizada donde se plantea que una "Entidad Distinta a la ONPF" (pero autorizada por esta) podría asumir la responsabilidad de la ONPF de auditar a las entidades autorizadas y de supervisar las acciones fitosanitarias.</li> <li>• Entre los párrafos 99 y 103 se describen funciones y responsabilidades de este tipo de entidad, pero en ningún párrafo del borrador de norma se indica cuáles serían los criterios que habrían de cumplir.</li> <li>• El procedimiento para las auditorias (párrafos 104 a 112) está enfocado a aquellas entidades que implementan acciones fitosanitarias: tanto auditorias previas a obtener la autorización como auditorias para mantenerla. Pero en el borrador de norma no se propone como la ONPF evaluara, auditara o supervisara a esa "Entidad Distinta a la ONPF".</li> <li>• El párrafo 101 indica que esta "Entidad Distinta a la ONPF" tendrá como responsabilidad el formular y ejecutar un plan de acción de acción o procedimiento para gestionar las no</li> </ul>

				<p>conformidades. Sin embargo, cuando se detecta una no conformidad, es el auditado quien propone y ejecuta el plan de acción, no el auditor. Y para la formulación del plan de acción, ese auditado debería considerar el procedimiento para abordar la no conformidad que establezca la ONPF en su programa de autorizaciones (ver párrafo 57).</p> <ul style="list-style-type: none"> <li>El párrafo 117 indica que: "Cualquier no conformidad detectada debería dar lugar a una acción correctiva que han de acordar la ONPF (o la entidad autorizada para auditar o supervisar) y la entidad autorizada que está siendo auditada". En el caso de que ocurra la segunda situación, ¿cómo la ONPF tendría certeza de que el plan de acción implementado logro subsanar la causa de la no conformidad, si no se ha establecido el mecanismo para evaluar el desempeño de esa "Entidad Distinta a la ONPF"?</li> </ul> <p><i>Category : SUBSTANTIVE</i></p>
81	G	(General Comment)		<p><b>Costa Rica</b> Cambiar en toda la norma: el término "emprender" por "ejecutar" Cambiar "procedimiento normalizado de actuación" por "procedimiento de operación normado" Se considera que es el término más adecuadas.</p> <p><i>Category : TECHNICAL</i></p>
<b>DRAFT ISPM: Authorization of entities to perform phytosanitary actions (2014-002)</b>				
82	1	<b>DRAFT ISPM: Authorization of entities to perform <u>phytosanitary</u> <u>Phytosanitary</u> actions (2014-002)</b>	P	<p><b>Ghana</b></p> <p><i>Category : EDITORIAL</i></p>
83	1	<b>DRAFT ISPM: Authorization of entities to perform phytosanitary actions (2014-002)</b>	C	<p><b>China</b> It should be mentioned that NPPO is accountable for phytosanitary actions conducted by authorized entities.</p> <p><i>Category : SUBSTANTIVE</i></p>
84	1	<b>DRAFT ISPM: Authorization of entities to perform phytosanitary actions (2014-002)</b>	C	<p><b>New Zealand</b> Entity/entities should be defined. There is no definition of entity in ISPM 5.</p> <p><i>Category : SUBSTANTIVE</i></p>
85	1	<b>DRAFT ISPM: Authorization of entities to perform phytosanitary actions (2014-002)</b>	C	<p><b>APPPC</b> (117) New Zealand (7 Sep 2018 7:21 AM) Entity/entities should be defined. There is no definition of entity in ISPM 5.</p> <p><i>Category : TECHNICAL</i></p>
86	1	<b>DRAFT ISPM: Authorization of entities to perform phytosanitary actions (2014-002)</b>	C	<p><b>APPPC</b> (150) APPPC (11 Sep 2018 7:07 AM) Entity/entities should be defined. There is no definition of entity in ISPM 5. (23) Japan (2 Sep 2018 9:42 AM)</p>

			<p>This draft ISPM should provide a guidance for authorization of entities in conformity with "Purpose" of a specification of this standard.</p> <p><i>Category : SUBSTANTIVE</i></p>
87	1	<p><b>DRAFT ISPM: Authorization of entities to perform phytosanitary actions (2014-002)</b></p>	<p>C <b>Ukraine</b></p> <p>Ukraine does not support the draft standard in this version. The phytosanitary control is a function of the state that has the task to maintain the phytosanitary safety of the country. The phytosanitary control is not a matter of commerce or business. The standard does not have clear distinction of functions that may be delegated. It should define clearly the responsibility at the governmental and non-governmental level; which of functions may be performed at the governmental level and which ones at the non-governmental level. We understand that according to the standard, an NPPO has ultimate responsibility and actions may be delegated to private entities. Thus, if an entity having delegation performs phytosanitary actions for import that does not meet requirements, the freight infected with quarantine organisms will come to the country. Then, an NPPO will be entitled to cancel or suspend the issued authorization. But this response would not compensate or stabilize the phytosanitary state of the country affected by introduction of a quarantine organism.</p> <p>The standard defines the roles and responsibilities of an NPPO including to train and control entities, maintain documentation and describe procedures of such actions meaning that an NPPO becomes a state agency performing a bureaucratic function working "for an entity" not a phytosanitary control function. Thus, the NPPO performance in terms of its main functions and responsibilities as foreseen by IPPC is brought to nought. The standard does not cover the issue of remuneration by an entity to an NPPO for the implemented audit, training system, granting of authorizations, etc.</p> <p>Having said that, we are convinced that the standard should also set the remuneration for delegated phytosanitary actions performed by an authorized entity.</p> <p>Authorizing entities to sampling and testing will make complying with the IPPC in the part of NPPO responsibilities, development of phytosanitary diagnosis and science, complicated and in some cases impossible.</p> <p>Private business is not always interested in developments and improvements in controls and protection of the country against harmful organisms.</p> <p>Moreover, this draft, if implemented, will:</p> <ul style="list-style-type: none"> <li>- increase the number of notifications received;</li> <li>- make it impossible, in some cases, for partner countries to fulfill their international trade obligations;</li> <li>- increase the risks of temporary plant import bans;</li> </ul>

				- suspend technical development of national phytosanitary laboratories; - significantly decrease the financial incomes of NPPO as well as capacities of timely payment of mandatory membership contributions to international organisations.  <i>Category : SUBSTANTIVE</i>
88	11	2013-11 Standards Committee (SC) recommended topic <i>Authorization of non-NPPO entities to perform <del>phytosanitary</del> Phytosanitary actions</i> to be added to the work programme.	P	<b>Ghana</b>  <i>Category : EDITORIAL</i>
89	12	2014-04 CPM-9 added the topic <i>Authorization of non-NPPO entities to perform <del>phytosanitary</del> Phytosanitary actions</i> (2014-002) to the work programme with priority 3 (subsequently changed to priority 2 by CPM-10).	P	<b>Ghana</b>  <i>Category : EDITORIAL</i>
90	15	<del>2016-05</del> 2018-05: El CN revisó el proyecto y lo aprobó para la primera consulta.	P	<b>Colombia</b> En la versión de español se debe cambiar 2016 – 05 por 2018 – 05. En la En la versión del idioma inglés se indica que es 2018 – 05, lo cual es lo correcto. <i>Category : TRANSLATION</i>
<b>Scope</b>				
91	27	<b>Scope</b>	C	<b>United States of America</b> How accredited entities within third parties themselves are related to this process of being authorized by the NPPO? <i>Category : SUBSTANTIVE</i>
92	28	This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize <del>private entities to</del> <u>private entities to</u> perform specific phytosanitary actions associated with import, domestic and export <del>systemson</del> <u>systems on</u> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>Canada</b>  <i>Category : EDITORIAL</i>
93	28	<del>This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. This standard provides guidance to</del> <u>national plant protection organizations (NPPOs) to authorize entities to perform specific phytosanitary actions associated with import and export systems on behalf of the NPPO.</u>	P	<b>Panama</b> There is no reason to differentiate between private and public entities because phytosanitary actions to be performed are the same. Domestic issues should not be part of an international standard.  <i>Category : SUBSTANTIVE</i>
94	28	This standard provides a <u>framework guidance</u> that enables national plant protection organizations ( <del>NPPOs</del> ) <u>to</u> ( <del>NPPOs</del> ) to authorize <del>private entities to</del> perform specific phytosanitary actions associated with import, domestic and export <del>systemson</del> behalf of the NPPO. Elements of this standard may also apply when authorizing	P	<b>Viet Nam</b>  <i>Category : EDITORIAL</i>

		public entities. <u>In principle, phytosanitary actions should be implemented by NPPO</u>	
95	28	This standard provides <del>a framework requirements for NPPOs</del> that <del>enables national plant protection organizations (NPPOs) to have decided to</del> authorize <del>private entities to</del> <u>entities to</u> perform specific phytosanitary actions associated with import, domestic and export systems on behalf of the NPPO. <del>Elements of this standard may also apply when authorizing public entities.</del>	P <b>EPPO</b> NPPOs are already allowed to authorize entities to perform phytosanitary actions and many NPPOs do already so. Thus this ISPM is not a prerequisite to delegate tasks, therefore the word 'enable' is not correct, this ISPM gives guidance to NPPOs. As stated in the general comments, legal advice should be sought during development of this Standard and international discussion is needed about the nature of the tasks which may be delegated to authorised entities, within the terms of Article V of the IPPC and in particular the expression "under the authority of". In line with task 5 of the specification, the different types of entities (individuals, private, public) need to be addressed in the Standard. Separate sections are needed on the requirements for private and public entities. <i>Category : SUBSTANTIVE</i>
96	28	This standard provides <del>a framework requirements for NPPOs</del> that <del>enables national plant protection organizations (NPPOs) to have decided to</del> authorize <del>private entities to</del> <u>entities to</u> perform specific phytosanitary actions <del>associated with import, domestic and export systems on behalf of the NPPO</del> <u>on their behalf</u> . <del>Elements of this standard may also apply when authorizing public entities.</del>	P <b>European Union</b> NPPOs are already allowed to authorize entities to perform phytosanitary actions and many NPPOs do already so. Thus this ISPM is not a prerequisite to delegate tasks, therefore the word 'enable' is not correct, this ISPM gives guidance to NPPOs. As stated in the general comments, legal advice should be sought during development of this Standard and international discussion is needed about the nature of the tasks which may be delegated to authorised entities, within the terms of Article V of the IPPC and in particular the expression "under the authority of". In line with task 5 of the specification, the different types of entities (individuals, private, public) need to be addressed in the Standard. Separate sections are needed on the requirements for private and public entities. <i>Category : SUBSTANTIVE</i>
97	28	This standard provides a framework that enables <del>national plant protection organizations</del> <u>National Plant Protection Organizations</u> (NPPOs) to authorize <del>private entities to</del> perform specific <del>phytosanitary</del> <u>Phytosanitary</u> actions associated with import, domestic and export systems on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P <b>Ghana</b> <i>Category : EDITORIAL</i>
98	28	This standard provides a <del>framework guidance</del> that enables national plant protection organizations <del>(NPPOs) to</del> <u>(NPPOs) to</u> authorize <del>private entities to</del> <u>private entities to</u> perform specific phytosanitary actions associated with import, domestic and export <del>systemson behalf</del> <u>systems under the responsibilities</u> of the NPPO. Elements of this standard may also apply when authorizing public entities.	P <b>Japan</b> This standard should provide a guidance for NPPOs in conformity with a specification of this standard because not all NPPOs authorize entities to perform phytosanitary actions. To modify in compliance with the IPPC(Article.2).

				Generally, Authorization of entities is conducted by the NPPO in the country. <i>Category : SUBSTANTIVE</i>
99	28	This standard provides a framework that enables national plant protection organizations ( <del>NPPOs</del> )to authorize <del>privateentitiesto-private entities to</del> perform specific phytosanitary actions associated with <del>import, domestic</del> import and export <del>systemson-systems on</del> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> Domestic actions not within the scope of International phytosanitary standards <i>Category : EDITORIAL</i>
100	28	This standard provides a framework that enables national plant protection organizations (NPPOs)to authorize privateentitiesto perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.  <u>In principle, phytosanitary actions should be implemented by NPPO.</u>	P	<b>China</b> To avoid the NPPO misuse this standard. <i>Category : SUBSTANTIVE</i>
101	28	This standard provides a framework that enables national plant protection organizations (NPPOs)to authorize privateentitiesto perform specific phytosanitary actions associated with <del>import, domestic and</del> export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>China</b> Its internal events of a country, if or not authorize the entities to perform import and domestic phytosanitary actions. This international standard only needs to regulate the authorized entities' phytosanitary actions of export products. <i>Category : SUBSTANTIVE</i>
102	28	This standard provides a framework that enables national plant protection organizations (NPPOs)to authorize <del>privateentitiesto</del> individuals, organizations, businesses entitiesto perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. <del>Elements of this standard may also apply when authorizing public entities.</del>	P	<b>China</b> Consistent with the scope of entity described at paragraph 45, which include individuals, organizations, businesses. <i>Category : SUBSTANTIVE</i>
103	28	This standard provides a framework that enables national plant protection organizations (NPPOs)to authorize privateentitiesto perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	C	<b>Jamaica</b> Remove domestic from the scope of the ISPM as NPPOs do not regulate domestic trade. <i>Category : SUBSTANTIVE</i>
104	28	This standard provides a framework that enables national plant protection organizations (NPPOs)to authorize <del>privateentitiesto-private entities to</del> perform specific phytosanitary actions associated with import, domestic and export <del>systemson-systems on</del> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>APPPC</b> (1) Nepal (9 Aug 2018 4:58 PM) <i>Category : EDITORIAL</i>
105	28	This standard provides a framework that enables national plant protection organizations (NPPOs)to authorize <del>privateentitiesto</del> individuals, organizations, business entitiesto perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. <del>Elements of this standard may also apply when authorizing public entities.</del>	P	<b>APPPC</b> (27) China (3 Sep 2018 9:13 AM) Consistent with the scope of entity described at paragraph 45, which include individuals, organizations, businesses. <i>Category : SUBSTANTIVE</i>

106	28	This standard provides a framework that enables national plant protection organizations ( <del>NPPOs</del> )to ( <del>NPPOs</del> ) to authorize <del>privateentitiesto-private entities to</del> perform specific phytosanitary actions associated <del>with import, domestic and with</del> export <del>systemson-systems on</del> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>APPPC</b> (28) China (3 Sep 2018 9:28 AM) Its internal events of a sovereignty, if or not authorize the entity to perform import and domestic phytosanitary actions.  <i>Category : SUBSTANTIVE</i>
107	28	This standard provides a framework that enables national plant protection organizations (NPPOs)to authorize privateentitiesto perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. <u>In principle, phytosanitary actions should be implemented by NPPO.</u>	P	<b>APPPC</b> (30) China (3 Sep 2018 9:38 AM) To prevent the exporting country misuse this standard and authorize entities to perform phytosanitary actions, and lead to NPPO can not fulfill the treaty very well.  <i>Category : SUBSTANTIVE</i>
108	28	This standard provides a framework that enables national plant protection organizations ( <del>NPPOs</del> )to ( <del>NPPOs</del> ) to authorize <del>privateentitiesto-private entities to</del> perform specific phytosanitary actions associated with import, domestic and export <del>systemson-systems on</del> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>APPPC</b> (81) Singapore (5 Sep 2018 12:43 PM) spacing.  <i>Category : EDITORIAL</i>
109	28	This standard provides a <u>framework-guidance</u> that enables national plant protection organizations ( <del>NPPOs</del> )to ( <del>NPPOs</del> ) to authorize <del>privateentitiesto-private entities to</del> perform specific phytosanitary actions associated with import, domestic and export <del>systemson-system son</del> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>APPPC</b> (11) Japan (19 Aug 2018 8:47 AM) This standard should provide a guidance for NPPOs in conformity with a specification of this standard because not all NPPOs authorize entities to perform phytosanitary actions.  To modify in compliance with the IPPC(ArticleIV.2) Generally, Authorization of entities is conducted by the NPPO in the country.  <i>Category : SUBSTANTIVE</i>
110	28	<del>This standard</del> provides a framework that enables national plant protection organizations (NPPOs)to authorize privateentitiesto perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>APPPC</b> (149) Myanmar (11 Sep 2018 5:47 AM) add  <i>Category : SUBSTANTIVE</i>
111	28	This standard provides a framework that enables national plant protection organizations ( <del>NPPOs</del> )to ( <del>NPPOs</del> ) to authorize <del>privateentitiesto-private entities to</del> perform specific phytosanitary actions associated with import, domestic and export <del>systemson-systems on</del> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>APPPC</b> (89) New Zealand (6 Sep 2018 7:01 AM) <i>Category : EDITORIAL</i>
112	28	This standard provides a framework that enables national plant protection organizations (NPPOs)to authorize <del>privateentitiesto-private entities to</del> perform specific phytosanitary actions associated with import, domestic and export <del>systemson-systems on</del> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>Egypt</b>  <i>Category : EDITORIAL</i>

113	28	This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to perform specific phytosanitary actions associated with import, domestic and export systems on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	C	<b>Mexico</b> This draft standard provides a framework to the NPPO to authorize private entities to perform specific phytosanitary actions but does not provide any requirement when the entity is public. The authorization procedure for public entities is not specified within the body of the project, therefore, it must be specified if it will be the same as those in the authorized entities or must cover only certain criteria. <i>Category : SUBSTANTIVE</i>
114	28	This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to perform specific phytosanitary actions associated with import, domestic and export <del>systemson</del> <u>systems on</u> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>Philippines</b> <i>Category : EDITORIAL</i>
115	28	This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize <del>private entities to</del> <u>private entities to</u> perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>Philippines</b> <i>Category : EDITORIAL</i>
116	28	This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize <del>private entities to</del> <u>private entities to</u> perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>Philippines</b> <i>Category : EDITORIAL</i>
117	28	This standard provides <del>a framework that enables guidance to</del> national plant protection organizations <del>(NPPOs) to</del> <u>(NPPOs) to</u> authorize <del>private entities to</del> <u>entities to</u> perform specific phytosanitary actions associated with import, <del>domestic</del> and export <del>systemson</del> <u>systems on</u> behalf of the NPPO. <del>Elements of this standard may also apply when authorizing public entities.</del>	P	<b>Costa Rica</b> There is no reason to differentiate between private and public entities because phytosanitary actions to be performed are the same. Domestic issues should not be part of an international standard <i>Category : SUBSTANTIVE</i>
118	28	This standard provides a framework that enables national plant protection organizations <del>(NPPOs) to</del> <u>(NPPOs) to</u> authorize <del>private entities to</del> <u>private entities to</u> perform specific phytosanitary actions associated with import, domestic and export <del>systemson</del> <u>systems on</u> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>NEPPO</b> <i>Category : EDITORIAL</i>
119	28	This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize <del>private entities to</del> <u>private entities to</u> perform specific phytosanitary actions associated with import, domestic and export <del>systemson</del> <u>systems on</u> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>Iran</b> <i>Category : EDITORIAL</i>

120	28	This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to perform specific phytosanitary actions associated with import, domestic and export system on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	C	<b>South Africa</b> Insertion of the word "legal", before the word: Private" reason being that the private entities must be legally established <i>Category : SUBSTANTIVE</i>
121	28	This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize <del>private entities to</del> <u>private entities to</u> perform specific phytosanitary actions <del>associated with import, domestic and export system on</del> <u>on</u> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>Montenegro</b> <i>Category : TECHNICAL</i>
122	28	This standard provides a framework that enables national plant protection organizations <del>(NPPOs) to (NPPOs) to</del> authorize <del>private entities to</del> <u>private entities to</u> perform specific phytosanitary actions associated with import, domestic and export <del>system on</del> <u>systems on</u> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>Singapore</b> <i>Category : EDITORIAL</i>
123	28	This standard provides <del>a framework that enables guidance to</del> national plant protection organizations <del>(NPPOs) to (NPPOs) to</del> authorize <del>private entities to</del> <u>entities to</u> perform specific phytosanitary actions associated with <del>import, domestic</del> <u>import</u> and export system on behalf of the NPPO. <del>Elements of this standard may also apply when authorizing public entities.</del>	P	<b>Argentina</b> There is no reason to differentiate between private and public entities because phytosanitary actions to be performed are the same. Domestic issues should not be part of an international standard. <i>Category : SUBSTANTIVE</i>
124	28	This standard provides <del>a framework that enables guidance to</del> national plant protection organizations (NPPOs) to authorize <del>private entities to</del> <u>entities to</u> perform specific phytosanitary actions associated with <del>import, domestic</del> <u>import</u> and export <del>system on</del> <u>systems on</u> behalf of the NPPO. <del>Elements of this standard may also apply when authorizing public entities.</del>	P	<b>Uruguay</b> There is no reason to differentiate between private and public entities because phytosanitary actions to be performed are the same. Domestic issues should not be part of an international standard. <i>Category : SUBSTANTIVE</i>
125	28	This standard provides a framework that enables national plant protection organizations <del>(NPPOs) to (NPPOs) to</del> authorize private entities to perform specific phytosanitary actions associated with import, domestic and export system on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>Ukraine</b> <i>Category : EDITORIAL</i>
126	28	This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize <del>private entities to</del> <u>private entities to</u> perform specific phytosanitary actions associated with import, domestic and export system on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.	P	<b>New Zealand</b> <i>Category : EDITORIAL</i>
127	28	This standard provides <del>a framework that enables guidance to</del> national plant protection organizations <del>(NPPOs) to (NPPOs) to</del> authorize <del>private entities to</del> <u>entities to</u> perform specific phytosanitary actions associated with <del>import, domestic</del> <u>import</u>	P	<b>COSAVE</b> There is no reason to differentiate between private and public entities because phytosanitary actions to be performed are the

		and export <del>systemson-systems on</del> behalf of the NPPO. <del>Elements of this standard may also apply when authorizing public entities.</del>		same. Domestic issues should not be part of an international standard. <i>Category : SUBSTANTIVE</i>
128	28	La presente norma ofrece un marco que permite a las organizaciones nacionales de protección fitosanitaria (ONPF) autorizar a entidades <del>privadas-privadas, publicas u organismos internacionales</del> a emprender, en nombre de la ONPF, acciones fitosanitarias específicas relacionadas con sistemas de importación, nacionales y de exportación. <del>Los elementos de esta norma podrán aplicarse también cuando la autorización se confiera a entidades públicas.</del>	P	<b>OIRSA</b> Se incluye organismos internacionales dado que estos también podría ejecutar las acciones fitosanitarias y estos por su condición especial en el país no pueden ser considerados como entidades privadas.  Simplificar el párrafo, más conciso  <i>Category : EDITORIAL</i>
129	28	La presente norma ofrece un marco que permite a las organizaciones nacionales de protección fitosanitaria (ONPF) autorizar a entidades privadas a emprender, en nombre de la ONPF, acciones fitosanitarias específicas relacionadas con sistemas de <del>importación, nacionales-importación</del> y de exportación. Los elementos de esta norma podrán aplicarse también cuando la autorización se confiera a entidades públicas.	P	<b>OIRSA</b> Los aspectos domésticos no encajan en el ámbito fitosanitario de la convención p.e. manejo de plagas establecidas si es que a esto se refiere doméstico. El termino domestico se puede malinterpretar. <i>Category : TECHNICAL</i>
130	29	This standard does not cover the issuance of phytosanitary certificates; these are issued by <del>authorized public officers-the NPPO</del> only (Article V.2(a) of the IPPC).	P	<b>Viet Nam</b>  <i>Category : EDITORIAL</i>
131	29	This standard does not cover the issuance of phytosanitary certificates; these are issued by <del>authorized public officers-the NPPO</del> only (Article V.2(a) of the IPPC).	P	<b>Korea, Republic of</b> To provide clarity that only the NPPO can provide the issuance of PCs and not other authorised public officers. <i>Category : TECHNICAL</i>
132	29	This standard does not cover the issuance of phytosanitary certificates; <del>these are they shall be issued only</del> by <del>authorized</del> public officers <del>only-authorized by the NPPO</del> (Article V.2(a) of the IPPC).	P	<b>EPPO</b> This is a clear requirement based on the IPPC and its ISPMs and this should be better reflected in this sentence using the wording of the Convention.  To improve clarity <i>Category : EDITORIAL</i>
133	29	This standard does not cover the issuance of phytosanitary <del>certificates;certificates</del> as these <del>are-can only be</del> issued by <del>authorized</del> public officers <del>only</del> -(Article V.2(a) of the IPPC).	P	<b>European Union</b> This is a clear requirement based on the IPPC and its ISPMs and this should be better reflected in this sentence using the wording of the Convention. <i>Category : SUBSTANTIVE</i>
134	29	This standard does not cover the issuance of phytosanitary certificates; these are issued by <del>authorized public officers-the NPPO</del> only (Article V.2(a) of the IPPC).	P	<b>Japan</b> To provide clarity that only the NPPO can provide the issuance of PCs and not other authorised public officers. This proposed change is supported by APPPC as well as by Japan. <i>Category : SUBSTANTIVE</i>
135	29	This standard does not cover the issuance of phytosanitary certificates; these are issued by <del>authorized public officers-the NPPO</del> only (Article V.2(a) of the IPPC).	P	<b>China</b> Only the NPPO can provide the issuance of PCs and be recognized. <i>Category : SUBSTANTIVE</i>

136	29	This standard does not cover the issuance of phytosanitary certificates; these are issued by <del>authorized public officers</del> <u>the NPPO</u> only (Article V.2(a) of the IPPC).	P	<b>New Zealand</b> To provide clarity that only the NPPO can provide the issuance of PCs and not other authorised public officers. <i>Category : TECHNICAL</i>
137	29	This standard does not cover the issuance of phytosanitary certificates; these are issued by authorized public officers only (Article V.2(a) of the IPPC). <u>If an authorized entity participate in an export phytosanitary action refer to one shipment, NPPO should indicate the name or special registration number of the authorized entity in corresponding phytosanitary certificate for export.</u>	P	<b>APPPC</b> (31) China (3 Sep 2018 9:47 AM) To be easy to trace to the source, while NPPO of import and export countries found noncompliance. <i>Category : SUBSTANTIVE</i>
138	29	This standard does not cover the issuance of phytosanitary certificates; these are issued by <del>authorized public officers</del> <u>the NPPO</u> only (Article V.2(a) of the IPPC).	P	<b>APPPC</b> (153) APPPC (11 Sep 2018 7:31 AM) To provide clarity that only the NPPO can provide the issuance of PCs and not other authorised public officers. <i>Category : TECHNICAL</i>
139	29	This standard does not cover the issuance of phytosanitary certificates; these are issued <del>by authorized public officers</del> <u>the NPPO</u> only (Article V.2(a) of the IPPC).	P	<b>APPPC</b> (88) New Zealand (6 Sep 2018 7:00 AM) <i>Category : TECHNICAL</i>
140	29	This standard does not cover the issuance of phytosanitary certificates; these are issued by authorized public officers only (Article V.2(a) of the IPPC).	C	<b>South Africa</b> Addition of the words: "or import authorisation certificates", to provide a broader understanding of the entire statement. Deletion of the pronoun: "these" in order to make the sentence clearer. The punctuation is confusing: is it a comma, as in the explanation column or a semicolon as in the text? It is my understanding that either of these would be incorrect if the phrase/ description/ wording is intended to read as follows: 'import authorization certificates'. <i>Category : EDITORIAL</i>
141	29	This standard does not cover the issuance of phytosanitary certificates; these are issued by authorized public officers only (Article V.2(a) of the IPPC).	C	<b>Ukraine</b> Our suggestion: This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to perform specific phytosanitary actions only in cases when an NPPO is unable whatever the reason to perform such functions.  This standard does not cover the issuance of phytosanitary certificates or directly related actions leading to the issuance of phytosanitary certificates as well as control functions at regulated objects import.  Phytosanitary certificates and related actions are issued by authorized public officers only (Article V.2(a) of the IPPC), as only this way the countries may accept a phytosanitary certificate as a reliable document.

				Except as may be agreed in bilateral contracts between governments authorizing entities to perform phytosanitary actions (sampling for phytosanitary expertise or phytosanitary expertise).  <i>Category : SUBSTANTIVE</i>
<b>References</b>				
142	32	<del>IPPC. 1997. International Plant Protection Convention. Rome, IPPC, FAO.</del>	P	<b>Argentina</b> Consistency with other adopted ISPM. <i>Category : EDITORIAL</i>
143	32	<del>IPPC. 1997. International Plant Protection Convention. Rome, IPPC, FAO.</del>	P	<b>Uruguay</b> For consistency with other adopted ISPMs <i>Category : EDITORIAL</i>
144	32	<del>IPPC. 1997. International Plant Protection Convention. Rome, IPPC, FAO.</del>	P	<b>COSAVE</b> Consistency with other adopted ISPM. <i>Category : EDITORIAL</i>
<b>Definitions</b>				
145	34	Definitions of <del>phytosanitary</del> <u>Phytosanitary</u> terms used in this standard can be found in ISPM 5 ( <i>Glossary of <del>phytosanitary</del> <u>Phytosanitary</u> terms</i> ).	P	<b>Ghana</b>  <i>Category : EDITORIAL</i>
146	34	Definitions of phytosanitary terms used in this standard can be found in ISPM 5 ( <i>Glossary of phytosanitary terms</i> ).  <u>Definition of Entity/entities</u>	P	<b>China</b> There is no definition of entity/entities in ISPM 5. <i>Category : SUBSTANTIVE</i>
147	34	Las definiciones de los términos fitosanitarios utilizados en la presente norma figuran en la NIMF 5 ( <i>Glosario de términos fitosanitarios</i> ).  <u>En la presente norma, se consideran “entidades” los ejecutores de la acción fitosanitaria (ya sean individuos, organizaciones o empresas ) y cuando proceda, su infraestructura (como el equipo, los laboratorios o los recintos de tratamiento).</u>	P	<b>OIRSA</b> Se traslada del párrafo 45 a este punto. Incluyéndose como un segundo párrafo en esta sección. Se considera más pertinente en este punto de definiciones y aclarar desde su inicio que se entiende por “entidad”. El vocablo “Particulares” se cambió por individuos para ser consistente con la versión en inglés  <i>Category : TECHNICAL</i>
<b>Outline of Requirements</b>				
148	36	This standard outlines the key requirements for the <del>development of an authorization programme and the eligibility criteria for of</del> <u>development of an authorization programme and the eligibility criteria for of</u> entities to <del>become authorized perform phytosanitary actions</del> . The standard identifies the roles and responsibilities of the <del>parties involved in NPPO and the implementation of an authorization programme</del> <u>authorized entity</u> . It also describes processes for audits, types of nonconformities, and types of authorization status that may apply to entities.	P	<b>EPPO</b> The term "authorization programme" is not clear. Eligibility criteria are part of the key requirements . More precise wording. <i>Category : TECHNICAL</i>
149	36	This standard outlines the key requirements for the development of an authorization programme and the eligibility criteria for entities to become	P	<b>Japan</b>  <i>Category : EDITORIAL</i>

		authorized. The standard identifies the roles and responsibilities of the parties involved in the implementation of an authorization programme. It also describes processes for audits, types of <del>noneconformities</del> <u>non-conformities</u> , and types of authorization status that may apply to entities.		
150	36	This standard outlines the key requirements for the <del>development of an authorization programme and the eligibility criteria for of</del> entities to <del>become authorized</del> <u>perform phytosanitary actions</u> . The standard identifies the roles and responsibilities of the <del>parties involved in NPPO and the implementation of an authorization programme</del> <u>authorized entity</u> . It also describes processes for audits, types of nonconformities, and types of authorization status that may apply to entities.	P	<b>European Union</b> The term "authorization programme" is not clear. Eligibility criteria are part of the key requirements . More precise wording. <i>Category : TECHNICAL</i>
151	36	This standard outlines the key requirements for the development of an authorization programme and the eligibility criteria for entities to become authorized. The standard identifies the roles and responsibilities of the parties involved in the implementation of an authorization programme. It also describes processes for audits, types of nonconformities, <u>actions by NPPO for nonconformities</u> , and types of authorization status that may apply to entities.	P	<b>IPPC Regional Workshop Africa</b> 'Include this phrase' actions by NPPO for nonconformities'. The reason is, these actions are included in body of the draft ISPM. <i>Category : SUBSTANTIVE</i>
152	36	This standard outlines the <del>key</del> requirements for the development of an authorization programme and the eligibility criteria for entities to become <del>authorized</del> <u>authorized by an NPPO to perform phytosanitary actions on its behalf</u> . The standard identifies the roles and responsibilities of the parties involved in the implementation of an authorization programme. It also describes processes for audits, types of nonconformities, and types of authorization status that may apply to entities.	P	<b>Argentina</b> To better outline the requirements. <i>Category : TECHNICAL</i>
153	36	This standard outlines the <del>key</del> requirements for the development of an authorization programme and the eligibility criteria for entities to become <del>authorized</del> <u>authorized by an NPPO to perform phytosanitary actions on its behalf</u> . The standard identifies the roles and responsibilities of the parties involved in the implementation of an authorization programme. It also describes processes for audits, types of nonconformities, and types of authorization status that may apply to entities.	P	<b>Uruguay</b> To better outline the requirements <i>Category : TECHNICAL</i>
154	36	This standard outlines the <del>key</del> requirements for the development of an authorization programme and the eligibility criteria for entities to become <del>authorized</del> <u>authorized by an NPPO to perform phytosanitary actions on its behalf</u> . The standard identifies the roles and responsibilities of the parties involved in the implementation of an authorization programme. It also describes processes for audits, types of nonconformities, and types of authorization status that may apply to entities.	P	<b>COSAVE</b> To better outline the requirements. <i>Category : TECHNICAL</i>

155	36	Cette NIMP décrit les principales exigences relatives à l'élaboration d'un programme d'autorisation ainsi que les critères à respecter pour <del>agrée</del> <del>permettre à un organisme</del> <u>organisme agréé à mener les actions phytosanitaires</u> . Elle établit les rôles et les responsabilités des parties qui participent à la mise en œuvre d'un programme d'autorisation. La norme décrit en outre les processus de vérification, les types de cas de non-conformité et les différents statuts d'autorisation dont peuvent relever les organismes concernés.	P	<b>Chad</b> correction de la première phrase du paragraphe 35 pour la compréhension  <i>Category : EDITORIAL</i>
Background				
156	37	<b>BACKGROUND</b>	C	<b>APPPC</b> (162) Philippines (12 Sep 2018 3:26 AM) please clarify what quality management systems are. It is important for the NPPOs, especially developing countries, to have a solid understanding in order to establish their own systems, if not yet present.  <i>Category : SUBSTANTIVE</i>
157	38	It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as <del>inspection</del> <u>monitoring, sampling</u> , testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the <del>IPPC</del> <u>IPPC in that the NPPO remains accountable for phytosanitary actions</u>	P	<b>Viet Nam</b>  <i>Category : EDITORIAL</i>
158	38	It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the <del>IPPC</del> <u>IPPC in that the NPPO remains accountable for phytosanitary actions</u> .	P	<b>Korea, Republic of</b>  <i>Category : SUBSTANTIVE</i>
159	38	It is becoming common in various countries throughout the world for <del>national plant protection organizations</del> <u>NPPOs</u> to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. <del>Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities.</del> However, there is a need to	P	<b>EPPO</b> This abbreviation is already used in paragraph 28.  Quality management system should be deleted as it might create confusion. Moreover, the word 'manufacturing' is not clear and this applies both to the public and private sector. As stated in the general comments, legal advice should be sought during development of this Standard and international discussion

		ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC.		is needed about the nature of the tasks which may be delegated to authorised entities, within the terms of Article V of the IPPC and in particular the expression "under the authority of".  <i>Category : SUBSTANTIVE</i>
160	38	It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. <del>Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities.</del> However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC. <u>Individuals assisting personnel of the NPPO in the presence and direct oversight of the NPPO personnel need not be authorized.</u>	P	<b>European Union</b> Quality management system should be deleted as it might create confusion. Moreover, the word 'manufacturing' is not clear and this applies both to the public and private sector. As stated in the general comments, legal advice should be sought during development of this Standard and international discussion is needed about the nature of the tasks which may be delegated to authorised entities, within the terms of Article V of the IPPC and in particular the expression "under the authority of".  An important clarification is added in the end of the paragraph. <i>Category : SUBSTANTIVE</i>
161	38	<u>Article IV of the IPPC lays down the roles and responsibilities for NPPOs.</u> It is becoming common in various countries throughout the world for <del>national plant protection organizations</del> <u>NPPOs</u> to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC.	P	<b>European Union</b> Clarifying opening sentence is added. This abbreviation is already used in paragraph 28. <i>Category : EDITORIAL</i>
162	38	It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific <del>phytosanitary</del> <u>Phytosanitary</u> actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC.	P	<b>Ghana</b>  <i>Category : EDITORIAL</i>
163	38	It is becoming common in various countries throughout the world for <del>national plant protection organizations</del> <u>National Plant Protection Organizations</u> to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities.	P	<b>Ghana</b>  <i>Category : EDITORIAL</i>

		However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC.		
164	38	It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the <del>IPPC</del> <b>IPPC in that the NPPO remains accountable for phytosanitary actions.</b>	P	<b>Japan</b> To clarify that NPPO remains accountable for phytosanitary actions. This proposed change is supported by APPPC as well as by Japan. <i>Category : SUBSTANTIVE</i>
165	38	It is becoming common in various countries throughout the world for <del>national plant protection organizations-NPPOs</del> to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC.	P	<b>United States of America</b> For consistency with the rest of the document - the abbreviation was already used above.. <i>Category : EDITORIAL</i>
166	38	It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and <del>treatment</del> <b>treatment (as listed in paragraph 2 in Requirements)</b> . Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC.	P	<b>New Zealand</b> Para 2 in Requirements lists the following: monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Also "phytosanitary security" seems to be missing.  <i>Category : TECHNICAL</i>
167	38	It is becoming common in various countries throughout the world for <del>national plant protection organizations-National Plant Protection Organizations</del> to authorize entities to perform specific phytosanitary actions such as inspection, testing, <del>surveillance-surveillance, pest risk analysis</del> and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC.	P	<b>APPPC</b> (2) Nepal (9 Aug 2018 5:02 PM) <i>Category : EDITORIAL</i>
168	38	It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and <del>treatment</del> <b>treatment (as listed in</b>	P	<b>APPPC</b> (118) New Zealand (7 Sep 2018 7:26 AM) Para 2 in Requirements lists the following: monitoring, sampling,

		<a href="#">paragraph 2 in Requirements</a> ). Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC.		inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Also “phytosanitary security” seems to be missing.  <i>Category : TECHNICAL</i>
169	38	It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the <a href="#">IPPCIPPC in that the NPPO remains accountable for phytosanitary actions.</a>	P	<b>APPPC</b> (152) APPPC (11 Sep 2018 7:26 AM) <i>Category : SUBSTANTIVE</i>
170	38	It is becoming common in various countries throughout the world for <del>national plant protection organizations</del> <a href="#">NPPOs</a> to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC.	P	<b>IPPC Regional Workshop Africa</b>  <i>Category : EDITORIAL</i>
171	38	It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and <del>treatment</del> <a href="#">treatment or other specific task determinate by NPPO.</a> Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC.	P	<b>Montenegro</b>  <i>Category : TECHNICAL</i>
172	38	It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. <del>Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities.</del> However, there is a need to <a href="#">harmonize the credibility of</a> such authorizations and that the practice aligns with the principles of the IPPC.	P	<b>Argentina</b> Deleted sentence because the meaning is unclear. Harmonize is more appropriate term to describe the purpose for an ISPM.  <i>Category : TECHNICAL</i>

173	38	It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. <del>Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities.</del> However, there is a need to ensure <del>harmonize the credibility of</del> such authorizations and that the practice aligns with the principles of the IPPC.	P	<b>Uruguay</b> Deleted sentence because the meaning is unclear. "Harmonize" is more appropriate term to describe the purpose for an ISPM.  <i>Category : TECHNICAL</i>
174	38	It <del>is becoming common in is</del> various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality <del>testing</del> management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC.	P	<b>OIRSA</b>  <i>Category : EDITORIAL</i>
175	38	It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. <del>Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities.</del> However, there is a need to ensure <del>harmonize the credibility of</del> such authorizations and that the practice aligns with the principles of the IPPC.	P	<b>COSAVE</b> Deleted sentence because the meaning is unclear. Harmonize is more appropriate term to describe the purpose for an ISPM.  <i>Category : TECHNICAL</i>
176	39	The need for harmonization when considering, developing and implementing <del>the</del> authorization <del>programmes of entities to perform phytosanitary actions</del> has led to the development of this standard.	P	<b>EPPO</b> The term "authorization programme" is not clear. More precise wording.  <i>Category : TECHNICAL</i>
177	39	The need for harmonization when considering, developing and implementing <del>the</del> authorization <del>programmes of entities to perform phytosanitary actions</del> has led to the development of this standard.	P	<b>European Union</b> The term "authorization programme" is not clear. More precise wording.  <i>Category : TECHNICAL</i>
178	39	<del>The need for harmonization</del> <del>This standard seeks an harmonized process</del> when considering, developing and implementing authorization <del>programmes has led to the development of this standard</del> <del>programmes.</del>	P	<b>Caribbean Agricultural Health and Food Safety Agency</b>  <i>Category : EDITORIAL</i>
179	39	The need for harmonization when considering, developing and implementing authorization programmes has led to the development of this standard.	C	<b>Jamaica</b> This standard seeks an harmonized process when considering, developing and implementing authorization programmes.  <i>Category : EDITORIAL</i>

180	39	<del>The need for harmonization</del> This standard seeks to harmonize the process when considering, developing and implementing authorization programmes has led to the development of this standard.	P	<b>Antigua and Barbuda</b> <i>Category : EDITORIAL</i>
181	39	<del>The need for harmonization when considering, developing and implementing authorization programmes has led to the development of this standard.</del>	P	<b>Costa Rica</b> This indication is not necessary, one of the principles established in ISPM 1 is harmonization and countries are urged to take into account, as appropriate, international standards when drafting their own regulations. <i>Category : TECHNICAL</i>
182	39	The need for harmonization when considering, developing and implementing authorization programmes has led to the development of this standard.	C	<b>Ukraine</b>  The Background refers to situations that are often exceptional rather than regular. As authorizing entities to perform specific phytosanitary actions such as inspection, testing, surveillance that are often inspector functions. The Background would better mention cases when an NPPO was unable to perform these or those procedures undertaken when entering the IPPC. Following such practices when entities not subordinated to an NPPO perform inspector functions, eventually an NPPO will be reorganized and terminated. The practice of authorization of certain inspector functions in some situations contradicts to paragraph 2 article IV IPPC.  <i>Category : SUBSTANTIVE</i>
183	39	<del>The need for harmonization when considering, developing and implementing authorization programmes has led to the development of this standard.</del>	P	<b>Argentina</b> Text deleted as a consequence of change in paragraph 38. <i>Category : TECHNICAL</i>
184	39	<del>The need for harmonization when considering, developing and implementing authorization programmes has led to the development of this standard.</del>	P	<b>Uruguay</b> Text deleted as a consequence of change in paragraph 38. <i>Category : TECHNICAL</i>
185	39	<del>The need for harmonization when considering, developing and implementing authorization programmes has led to the development of this standard.</del>	P	<b>COSAVE</b> Text deleted as a consequence of change in paragraph 38. <i>Category : TECHNICAL</i>
186	39	<del>La necesidad de armonización a la hora de considerar, elaborar y aplicar programas de autorizaciones ha conducido a la elaboración de esta norma.</del>	P	<b>OIRSA</b> Termino ambiguo. Es difícil ver como la armonización haya dado raíz a la necesidad de esta norma. <i>Category : SUBSTANTIVE</i>
<b>IMPACTS ON BIODIVERSITY AND THE ENVIRONMENT</b>				
187	41	Standardized requirements for the authorization programmes of entities may have a positive impact on biodiversity and the environment because if they may result in more effective and consistent delivery of phytosanitary actions, helping to enhance the integrity (i.e. Better preventing the overall effectiveness introduction and reliability) spread of regulated pests is beneficial to biodiversity through the	P	<b>EPPO</b> The term "authorization programme" is not clear. More precise wording.  To better explain the link with biodiversity and environment. <i>Category : TECHNICAL</i>

		<del>NPPO's phytosanitary system, protection of plant health and the decrease in the use of treatments having a negative environmental impact.</del>		
188	41	Standardized authorization programmes may have a positive impact on biodiversity and the environment because they may result in more effective and consistent delivery of phytosanitary actions, helping to enhance the integrity (i.e. the overall effectiveness and reliability) of the NPPO's phytosanitary system. <u>Better prevention of the introduction and spread of regulated pests is beneficial to biodiversity through the protection of plant health and the decrease in the use of treatments having a negative environmental impact.</u>	P	<b>European Union</b> To better explain the link with biodiversity and environment. <i>Category : TECHNICAL</i>
189	41	Standardized <u>requirements for the authorization programmes of entities</u> may have a positive impact on biodiversity and the environment <del>because if they may result in more</del> effective and consistent delivery of phytosanitary actions, <del>helping to enhance the integrity (i.e. the overall effectiveness and reliability) of the NPPO's phytosanitary system.</del>	P	<b>European Union</b> The term "authorization programme" is not clear. More precise wording. <i>Category : TECHNICAL</i>
190	41	Standardized authorization programmes may have a positive impact on biodiversity and the environment because they may result in more effective and consistent delivery of <del>phytosanitary</del> <u>Phytosanitary</u> actions, helping to enhance the integrity (i.e. the overall effectiveness and reliability) of the NPPO's <del>phytosanitary</del> <u>Phytosanitary</u> system.	P	<b>Ghana</b> <i>Category : EDITORIAL</i>
191	41	Standardized authorization programmes may have a positive impact on biodiversity and the environment because they may result in more effective and consistent delivery of phytosanitary actions, helping to enhance the integrity (i.e. the overall effectiveness and reliability) of the NPPO's <del>phytosanitary system.</del> <u>phytosanitary system. What does phytosanitary system constitute??</u>	P	<b>IPPC Regional Workshop Africa</b> <i>Category : TECHNICAL</i>
192	41	Standardized authorization programmes may have a positive impact on biodiversity and the environment because they may result in more effective and consistent delivery of phytosanitary actions, helping to enhance the integrity (i.e. the overall effectiveness and reliability) of the NPPO's phytosanitary system.	C	<b>Ukraine</b> We believe standardized authorization programmes may have a positive as well as NEGATIVE impact on biodiversity and the environment. Implementation of the standard will in no way have a positive impact on the environment especially on the biodiversity of plants. As performance of functions by authorized entities cannot guarantee the phytosanitary safety. The phytosanitary system will be weakened due to imperfect performance of phytosanitary controls by an NPPO. <i>Category : SUBSTANTIVE</i>
<b>Requirements</b>				
193	42	<b>REQUIREMENTS</b>	P	<b>APPPC</b> (46) Thailand (5 Sep 2018 12:02 PM) A new heading should be added to clarify detail of these

		<b><u>1. BASIC UNDERSTANDING OF AUTHORIZATION</u></b>		paragraphs. <i>Category : SUBSTANTIVE</i>
194	42	<b>REQUIREMENTS</b>	P	<b>Jamaica</b> Legal framework needed to guide this ISPM. Concerned about trade facilitation to the detriment of plant health. <i>Category : SUBSTANTIVE</i>
195	43	Authorization is a process that may be used by NPPOsto formally recognize entities to undertake <del>specific NPPO-specific</del> phytosanitary <del>actions</del> <u>actions that have been historically performed by NPPOs</u> . An NPPO's authorization programme operates within its phytosanitary system.	P	<b>Canada</b> To provide clarity. <i>Category : EDITORIAL</i>
196	43	Authorization is a process that may be used by <del>NPPOsto-NPPOs to</del> formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system.	P	<b>Canada</b> <i>Category : EDITORIAL</i>
197	43	Authorization is a process that may be used by <del>NPPOsto-NPPOs to</del> formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system.	P	<b>Saint Kitts And Nevis</b> <i>Category : EDITORIAL</i>
198	43	Authorization <del>is a process that</del> may be used by NPPOsto formally recognize entities to undertake specific <del>NPPO</del> phytosanitary <del>actions</del> . <del>An NPPO's authorization programme operates within its phytosanitary system.</del> <u>actions associated with NPPO's import, domestic or export systems. The process for authorization should operate within the NPPO's phytosanitary system.</u>	P	<b>EPPO</b> Superfuous words are deleted. The term "authorization programme" is not clear. According to ISPM 5, "phytosanitary actions" are "official" operations, so they are "established, authorized or performed by a NPPO". Precisions coming from the last sentence of paragraph 44 (and from paragraph 28). More appropriate wording for an ISPM. <i>Category : TECHNICAL</i>
199	43	<del>Authorization is a process that may be used by NPPOsto formally recognize entities</del> <u>Authorization: transfer of tasks to undertake specific NPPO phytosanitary actions an entity that will perform the task under the responsibility and oversight of the NPPO.</u> <del>An NPPO's</del> <u>The process for authorization programme operates should operate within its the NPPO's</u> phytosanitary system.-.	P	<b>European Union</b> The term "authorization programme" is not clear. According to ISPM 5, "phytosanitary actions" are "official" operations, so they are "established, authorized or performed by a NPPO". Precisions coming from the last sentence of paragraph 44 (and from paragraph 28). More appropriate wording for an ISPM ('should' as it is a requirement and therefore it is better to word it also as such). <i>Category : TECHNICAL</i>
200	43	Authorization is a process that may be used by <del>NPPOsto-NPPO's to</del> formally recognize entities to undertake specific NPPO <del>phytosanitary</del> <u>Phytosanitary</u> actions. An NPPO's authorization programme operates within its <del>phytosanitary</del> <u>Phytosanitary</u> system.	P	<b>Ghana</b> <i>Category : EDITORIAL</i>
201	43	Authorization is a process that may be used by <del>NPPOsto-NPPOs to</del> formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system.	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> <i>Category : EDITORIAL</i>

202	43	Authorization is a process that may be used by <del>NPPOsto</del> <u>NPPOs to</u> formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system.	P	<b>Japan</b> <i>Category : EDITORIAL</i>
203	43	Authorization is a process that may be used by <del>NPPOsto</del> <u>NPPOs to</u> formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system.	P	<b>APPPC</b> (163) Philippines (12 Sep 2018 3:26 AM) (90) New Zealand (6 Sep 2018 7:02 AM) (3) Nepal (9 Aug 2018 5:03 PM) <i>Category : EDITORIAL</i>
204	43	Authorization is a process that may be used by <del>NPPOsto</del> formally recognize entities to undertake specific NPPO phytosanitary actions. <del>An</del> NPPO's authorization programme operates within its phytosanitary system.	P	<b>NEPPO</b> <i>Category : EDITORIAL</i>
205	43	Authorization is a process that may be used by <del>NPPOsto</del> <u>NPPOs to</u> formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system.	P	<b>NEPPO</b> <i>Category : EDITORIAL</i>
206	43	Authorization is a process that may be used by <del>NPPOsto</del> <u>NPPOs to</u> formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system.	P	<b>Egypt</b> <i>Category : EDITORIAL</i>
207	43	Authorization is a process that may be used by <del>NPPOsto</del> <u>NPPOs to</u> formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system.	P	<b>Egypt</b> <i>Category : EDITORIAL</i>
208	43	Authorization is a process that may be used by <del>NPPOsto</del> formally recognize entities to undertake specific NPPO phytosanitary actions, <u>document assessment and pest identification activities</u> . An NPPO's authorization programme operates within its phytosanitary system.	P	<b>Australia</b> The original text did not include assessment fit activities. <i>Category : TECHNICAL</i>
209	43	<b><u>1. Basic Understanding of Authorization</u></b> Authorization is a process that may be used by <del>NPPOsto</del> formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system.	P	<b>Thailand</b> A new heading should be added to clarify detail of these paragraphs. <i>Category : SUBSTANTIVE</i>
210	43	<del>Authorization is a process that may be used by NPPOsto formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system.</del>	P	<b>Malawi</b> No comment <i>Category : SUBSTANTIVE</i>
211	43	<del>Authorization is a process that may be used by NPPOsto formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system.</del> <u>La autorización es un procedimiento que podrán utilizar las ONPF para reconocer formalmente a entidades que cumplan los requisitos a fin de que emprendan acciones fitosanitarias específicas de las ONPF. El programa de autorizaciones de una ONPF opera dentro de su sistema fitosanitario.</u>	P	<b>Nicaragua</b> La autorización es un procedimiento que podrán utilizar las ONPF para reconocer formalmente a ciertas entidades a fin de que emprendan acciones fitosanitarias específicas de las ONPF. El programa de autorizaciones de una ONPF opera dentro de su sistema fitosanitario. <i>Category : SUBSTANTIVE</i>

		<u>"A ciertas" es un término discrecional</u>		
212	43	Authorization is a process that may be used by NPPOsto formally recognize entities to undertake specific <del>NPPO</del> -phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system.	P	<b>Argentina</b> Redundant. Phytosanitary action by definition is an official operation. <i>Category : TECHNICAL</i>
213	43	Authorization is a process that may be used by <del>NPPOsto</del> - <u>NPPOs to</u> formally recognize entities to undertake specific <del>NPPO</del> -phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system.	P	<b>Uruguay</b> NPPO deleted to avoid redundancy. Phytosanitary action by definition is an official operation, therefore being official they are performed or authorized by NPPO. <i>Category : TECHNICAL</i>
214	43	Authorization is a process that may be used by <del>NPPOsto</del> - <u>NPPOs to</u> formally recognize entities to undertake specific <del>NPPO</del> -phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system.	P	<b>COSAVE</b> Redundant. Phytosanitary action by definition is an official operation. <i>Category : TECHNICAL</i>
215	43	La autorización es un procedimiento que podrán utilizar las ONPF para reconocer formalmente a <del>ciertas</del> -entidades <u>que cumplen los requisitos</u> a fin de que emprendan acciones fitosanitarias específicas de las ONPF. El programa de autorizaciones de una ONPF opera dentro de su sistema fitosanitario.	P	<b>OIRSA</b> "A ciertas" es un término discrecional <i>Category : SUBSTANTIVE</i>
216	43	La autorización es un procedimiento que podrán utilizar las ONPF para reconocer formalmente a <del>ciertas</del> -entidades a fin de que emprendan acciones fitosanitarias específicas de las ONPF. El programa de autorizaciones de una ONPF opera dentro de su sistema fitosanitario.	P	<b>Costa Rica</b> "A ciertas" es un término discrecional <i>Category : TECHNICAL</i>
217	43	La autorización es un procedimiento que podrán utilizar las ONPF para reconocer formalmente a ciertas entidades a fin de que <del>emprendan-ejecuten</del> acciones fitosanitarias específicas de las ONPF. El programa de autorizaciones de una ONPF opera dentro de su sistema fitosanitario.	P	<b>Costa Rica</b>  <i>Category : EDITORIAL</i>
218	43	La autorización es un procedimiento que podrán utilizar las ONPF para reconocer formalmente <del>a ciertas a</del> entidades <u>que cumplan requisitos</u> , a fin de que emprendan acciones fitosanitarias específicas de las ONPF. El programa de autorizaciones de una ONPF opera dentro de su sistema fitosanitario.	P	<b>Nicaragua</b> La autorización es un procedimiento que podrán utilizar las ONPF para reconocer formalmente a ciertas entidades que cumplan los requisitos a fin de que emprendan acciones fitosanitarias específicas de las ONPF. El programa de autorizaciones de una ONPF opera dentro de su sistema fitosanitario.  "A ciertas" es un término discrecional <i>Category : SUBSTANTIVE</i>
219	44	<del>An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). It is up to each contracting party or NPPO to decide whether or not to authorize entities to perform</del>	P	<b>IPPC Regional Workshop Central Asia &amp; Central Europe</b> The Regional Workshop proposed to improve this section (Para 44) as indicated.  This section reads in Russian as follows: Каждая Договаривающаяся сторона или НОКЗР решают, уполномочивать или нет юридических лиц на осуществление конкретных фитосанитарных действий. Если они принимают

		<p><u>specific phytosanitary actions. If they decide to do so, it is also their decision to determine which entity is authorized and for which specific phytosanitary actions. With the authorization the task is performed by the entity but the responsibility remains with the NPPO. The quality of the tasks performed by authorized entities should be at least of the same level of the quality when these tasks are performed by the NPPO.</u></p> <p><u>Such authorization may be given only to carry out official operations to implement phytosanitary measures that are decided by the NPPO. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine and destruction. . Authorization for phytosanitary actions does not include NPPO tasks that affect core activities in the NPPOs such as issuance of phytosanitary certificates or setting phytosanitary measures because these are not phytosanitary actions. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).</u></p> <p><u>When authorizing entities to perform phytosanitary actions, the NPPO should keep sufficient staff and expertise to manage their phytosanitary system, carry out the functions described in Article IV of the IPPC, and carry out oversight over the tasks performed by authorized entities.</u></p>		<p>данное решение на осуществление данных действий, то они также согласно своему решению определяют, какой орган уполномочен и для каких конкретных фитосанитарных действий. При уполномочивании данная задача выполняется юридическим лицом, но ответственность за выполнение данных задач по-прежнему возлагается на НОКЗР. Качество задач, выполняемых уполномоченными юридическими лицами, должно быть по крайней мере того же уровня качества, когда эти задачи выполняются НОКЗР.</p> <p>Такое уполномочивание может быть предоставлено только для проведения официальных функций по осуществлению фитосанитарных действий, которые решаются НОКЗР. Примерами фитосанитарных действий, на выполнение которых от своего имени НОКЗР может уполномочить юридическое лицо, являются мониторинг, отбор образцов, досмотр, анализ, надзор, обработки, карантин после ввоза, и уничтожение, наблюдение и аудит. Уполномочивание на осуществление фитосанитарных действий не включает задачи НОКЗР, которые затрагивают основные виды деятельности в странах НОКЗР, такие как выдача фитосанитарных сертификатов или установление фитосанитарных мер, поскольку они не являются фитосанитарными действиями. В рамках программы по передаче полномочий, юридические лица могут выполнять фитосанитарные действия в рамках фитосанитарной регламентирующей системы (импортной, внутринациональной или экспортной).</p> <p>При уполномочивании юридических лиц на осуществление фитосанитарных действий НОКЗР должен обладать достаточным штатом и опытом для управления своей фитосанитарной системой, выполнять функции, описанные в Статье IV, и осуществлять надзор за выполнением задач, выполняемых уполномоченными юридическими лицами.</p> <p><i>Category : SUBSTANTIVE</i></p>
220	44	<p><u>The NPPO has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to include in the programme depend on its country's situation.</u> An NPPO should determine whether to authorize entities to perform phytosanitary actions. <del>Examples of phytosanitary-</del> <u>Phytosanitary</u> actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, <del>inspection,</del> testing, surveillance, treatment, <del>post-entry quarantine, destruction, supervision and auditing.</del> Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).</p>	P	<p><b>Viet Nam</b></p> <p><i>Category : SUBSTANTIVE</i></p>
221	44	<p><u>An NPPO has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to be included in the programme depend on its country's situation. An NPPO should determine</u></p>	P	<p><b>Korea, Republic of</b></p> <p>To clearly specifies that NPPO has responsibilities to decide which phytosanitary action can be conducted as an authorization</p>

		whether to authorize entities to perform phytosanitary actions.Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, <del>supervisionand</del> <u>supervision and</u> auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or <del>export</del> ) <u>for a defined period of time.</u>		programme and which elements need to include in the programme depend on its country's situation. <i>Category : SUBSTANTIVE</i>
222	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions.Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include <del>monitoring</del> , sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditing. <u>Under an authorization programme, Authorized</u> entities may perform <u>specific</u> phytosanitary actions within <u>a the NPPO's phytosanitary regulatory system (import, domestic or export)-system.</u>	P	<b>EPPO</b> In case replacement of paragraph 44 is not accepted. The term "authorization program" is not clear. It is suggested to move "import, domestic or import" in paragraph 43 which introduces the section.  In case replacement of paragraph 44 is not accepted. According to ISPM 5, monitoring is a kind of surveillance.  <i>Category : TECHNICAL</i>
223	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions.Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).	C	<b>EPPO</b> This section has been improved by the Regional Workshop in Bykovo and endorsed by the EPPO Panel to make clear that it is a sovereign decision of CPs whether to authorize entities and if so for what sort of actions and under what conditions. To avoid unclarity on the wording 'on its behalf' and possible responsibilities transferred. In addition, these paragraphs are needed to clarify that the responsibility always stays with the NPPO, that the entity should perform well, that the NPPO should keep sufficient critical mass to perform its NPPO tasks, that the decisions on phytosanitary measures stay with the NPPO and that certain NPPO tasks cannot be delegated to entities.  EPPO therefore suggests the following text for this section: It is up to each contracting party or NPPO to decide whether or not to authorize entities to perform specific phytosanitary actions. If they decide to do so, it is also their decision to determine which entity is authorized and for which specific phytosanitary actions. With the authorization the action is performed by the entity but the responsibility remains with the NPPO. The authorized entities should fulfil the performance criteria set by the NPPOs .  Such authorization may be given only to carry out actions to implement phytosanitary measures that are decided by the NPPO. Examples of phytosanitary actions that an NPPO may authorize an entity to perform include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine and destruction. Authorization for phytosanitary actions does not include NPPO tasks that affect core activities of the NPPO such as

			<p>issuance of phytosanitary certificates or setting phytosanitary measures because these are not phytosanitary actions. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).</p> <p>When authorizing entities to perform phytosanitary actions, the NPPO should keep sufficient staff and expertise to manage their phytosanitary system, carry out the functions described in Article IV of the IPPC, and carry out oversight over the actions performed by authorized entities.</p> <p><i>Category : SUBSTANTIVE</i></p>
224	44	<p><del>An It is up to each contracting party or NPPO should determine to decide whether or not to authorize entities to perform specific phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity- . If they decide to perform on its behalf include monitoringdo so, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditingit is also their decision to determine which entity is authorized and for which specific phytosanitary actions. Under an With the authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export)the action is performed by the entity but the responsibility remains with the NPPO. The authorized entities should fulfil the performance criteria set by the NPPOs .</del></p> <p><u>Such authorization may be given only to carry out actions to implement phytosanitary measures that are decided by the NPPO. Examples of phytosanitary actions that an NPPO may authorize an entity to perform include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine and destruction. Authorised entities may perform specific phytosanitary actions within the NPPO's phytosanitary regulatory system.</u></p> <p><u>When authorizing entities to perform phytosanitary actions, the NPPO should keep sufficient staff and expertise to manage their phytosanitary system, fulfil their responsibilities described in Article IV of the IPPC, and carry out oversight over the actions performed by authorized entities.</u></p>	<p>P <b>European Union</b></p> <p>This section has been improved to make it clear that it is a sovereign decision of CPs whether to authorize entities and if so for what sort of actions and under what conditions.</p> <p>To avoid unclarity on the wording 'on its behalf' and possible responsibilities transferred.</p> <p>In addition, these paragraphs are needed to clarify that the responsibility always stays with the NPPO, that the entity should perform well, that the NPPO should keep sufficient critical mass to fulfil the NPPO's responsibilities, that the decisions on phytosanitary measures stay with the NPPO and that certain NPPO tasks cannot be delegated to entities.</p> <p><i>Category : SUBSTANTIVE</i></p>

225	44	An NPPO should determine whether to authorize entities to perform <del>phytosanitary</del> <b>Phytosanitary</b> actions. Examples of <del>phytosanitary</del> <b>Phytosanitary</b> actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, <del>supervision and</del> <b>supervision and</b> auditing. Under an authorization programme, entities may perform <del>phytosanitary</del> <b>Phytosanitary</b> actions within a <del>phytosanitary</del> <b>Phytosanitary</b> regulatory system (import, domestic or export).	P	<b>Ghana</b> <i>Category : EDITORIAL</i>
226	44	<del>NPPO has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to include in the programme depend on its country's situation.</del> An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, <del>supervision and</del> <b>supervision and</b> auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).	P	<b>Japan</b> It clearly specifies that NPPO has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to include in the programme depend on its country's situation. <i>Category : SUBSTANTIVE</i>
227	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).	C	<b>Jamaica</b> Revision to paragraph. An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, quarantine and destruction. In addition, supervision and auditing entities may be authorized to perform supervision and auditing in the phytosanitary context. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import or export). Remove the word domestic from the sentence as NPPOs do not usually regulate domestic activities. <i>Category : SUBSTANTIVE</i>
228	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO <del>may shall</del> authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry <del>quarantine, quarantine and</del> destruction. <del>In addition, supervision and auditing entities may be authorized to perform supervision and auditing in the phytosanitary context.</del> Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, <del>domestic or</del> export).	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> As these entities would be obliged to perform phytosanitary actions within a phytosanitary regulatory system.  Supervision and auditing are not phytosanitary action but quality control actions <i>Category : SUBSTANTIVE</i>
229	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to	P	<b>China</b> To clarify the period of authorization can be flexible. <i>Category : SUBSTANTIVE</i>

		perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export)- <u>2</u> .  <u>Authorization may be periodical or long-term</u>		
230	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within <u>a-an export</u> phytosanitary regulatory system ( <del>import, domestic or export</del> ).	P	<b>China</b> Its internal events of a country, if or not authorize the entities to perform import and domestic phytosanitary actions. <i>Category : SUBSTANTIVE</i>
231	44	An NPPO <u>has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to be included in the programme depend on its country's situation.</u> An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, <del>supervision and supervision and</del> auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).	P	<b>China</b> To clearly specifies that NPPO has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to include in the programme depend on its country's situation. <i>Category : SUBSTANTIVE</i>
232	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, <del>domestic-domestic, export, or export</del> ) <u>re-export</u> ).	P	<b>United States of America</b> Consider adding it through the text where appropriate. <i>Category : TECHNICAL</i>
233	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, <u>phytosanitary security</u> , testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).	P	<b>New Zealand</b> Phytosanitary security is an important part of maintaining the integrity of the assurance system. <i>Category : TECHNICAL</i>
234	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing,	P	<b>APPPC</b> (4) Nepal (9 Aug 2018 5:04 PM) <i>Category : EDITORIAL</i>

		surveillance, <a href="#">pest risk analysis</a> , treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).		
235	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions. <del>Examples of phytosanitary</del> <a href="#">Phytosanitary</a> actions that an NPPO may authorize an entity to perform on its behalf include <a href="#">monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing</a> . Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).	P	<b>APPPC</b> (32) China (3 Sep 2018 9:49 AM) Definition of the specific phytosanitary actions which may be authorized to perform by entities, contribute to prevent the authorization be misused. The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO.  <i>Category : SUBSTANTIVE</i>
236	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory <del>system (import, domestic or export)</del> <a href="#">system</a> .	P	<b>APPPC</b> (33) China (3 Sep 2018 9:52 AM) Its internal events of a sovereignty, if or not authorize the entity to perform import and domestic phytosanitary actions  <i>Category : SUBSTANTIVE</i>
237	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export) <del>—</del> .  <a href="#">Authorization may be periodical or long-term</a>	P	<b>APPPC</b> (34) China (3 Sep 2018 9:53 AM) To definite the period of authorization may be flexible.  <i>Category : SUBSTANTIVE</i>
238	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, <del>supervision and</del> <a href="#">supervision and</a> auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).	P	<b>APPPC</b> (91) New Zealand (6 Sep 2018 7:03 AM) <i>Category : EDITORIAL</i>
239	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, <a href="#">phytosanitary security</a> , testing, surveillance, treatment, post-entry quarantine, destruction,	P	<b>APPPC</b> (119) New Zealand (7 Sep 2018 7:27 AM) <i>Category : TECHNICAL</i>

		supervisionand auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export)-.		
240	44	<u>NPPO has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to include in the programme depend on its country's situation.</u> An NPPO should determine whether to authorize entities to perform phytosanitary actions.Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).	P	<b>APPPC</b> (143) Japan (10 Sep 2018 2:16 PM) It clearly specifies that NPPO has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to include in the programme depend on its country's situation.  <i>Category : SUBSTANTIVE</i>
241	44	An NPPO <u>has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to be included in the programme depend on its country's situation.</u> An NPPO should determine whether to authorize entities to perform phytosanitary actions.Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, <u>supervisionand supervision and</u> auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or <del>export</del> ) <u>export) for a defined period of time.</u>	P	<b>APPPC</b> (154) APPPC (11 Sep 2018 7:43 AM) To clearly specifies that NPPO has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to include in the programme depend on its country's situation.  <i>Category : SUBSTANTIVE</i>
242	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions. <u>Examples of phytosanitary . These actions that an NPPO may authorize an entity to perform on its behalf</u> include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).	P	<b>Antigua and Barbuda</b> The second sentence is unnecessarily wordy. <i>Category : EDITORIAL</i>
243	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions.Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, <u>supervisionand supervision and</u> auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).	P	<b>Egypt</b>  <i>Category : EDITORIAL</i>
244	44	An NPPO <u>should-may</u> determine whether to authorize entities to perform phytosanitary actions-. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling,	P	<b>IPPC Regional Workshop Africa</b> Created by merging other changes together <i>Category : SUBSTANTIVE</i>

		inspection, testing, surveillance, treatment, post-entry quarantine, destruction, <del>supervisionand supervision and</del> auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, <del>domestic domestic, goods on transit</del> or export).		
245	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, <del>supervisionand supervision and</del> auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).	P	<b>Philippines</b> <i>Category : EDITORIAL</i>
246	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).	P	<b>Philippines</b> <i>Category : EDITORIAL</i>
247	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditing. <del>Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).</del>	P	<b>Montenegro</b> <i>Category : SUBSTANTIVE</i>
248	44	An NPPO <del>should may</del> determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).	P	<b>Eritrea</b> <i>Category : EDITORIAL</i>
249	44	An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system ( <del>import, domestic (import</del> or export).	P	<b>Mexico</b> The domestic issues is not relevant here. Domestic issues should not be part of an ISPM <i>Category : SUBSTANTIVE</i>

250	44	<p>An NPPO should <del>determine</del> whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (<del>import, domestic or export</del>). Una ONPF debería determinar si autoriza a ciertas entidades a emprender acciones fitosanitarias. Como ejemplos de acciones fitosanitarias que podrá emprender una entidad con autorización y supervisión de una ONPF y estará facultado para las siguientes actividades el monitoreo, el muestreo, la inspección, la realización de pruebas, la vigilancia, el tratamiento, la cuarentena pos entrada, la destrucción, la supervisión y la auditoría. En el marco de un programa de autorizaciones, las entidades podrán emprender acciones fitosanitarias dentro de un sistema de reglamentación fitosanitaria (de importación, nacional o de exportación).</p>	<p>P <b>Nicaragua</b> Una ONPF debería determinar si autoriza a ciertas entidades a emprender acciones fitosanitarias. Como ejemplos de acciones fitosanitarias que podrá emprender una entidad con autorización de una ONPF y en su nombre cabe citar el monitoreo, el muestreo, la inspección, la realización de pruebas, la vigilancia, el tratamiento, la cuarentena pos entrada, la destrucción, la supervisión y la auditoría. En el marco de un programa de autorizaciones, las entidades podrán emprender acciones fitosanitarias dentro de un sistema de reglamentación fitosanitaria (de importación, nacional o de exportación). <i>Category : TECHNICAL</i></p>
251	44	<p>An NPPO should <del>determine</del> <u>decide</u> whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (<del>import, domestic</del> <u>import</u> or export).</p>	<p>P <b>Argentina</b> Domestic issues should not be part of an ISPM. To emphasize that the authorization of entities is an NPPO decision. <i>Category : TECHNICAL</i></p>
252	44	<p>An NPPO should <del>determine</del> <u>decide</u> whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (<del>import, domestic</del> <u>import</u> or export).</p>	<p>P <b>Uruguay</b> To emphasize that the authorization of entities is an NPPO decision. Domestic issues should not be part of an ISPM <i>Category : TECHNICAL</i></p>
253	44	<p>An NPPO should <del>determine</del> <u>decide</u> whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (<del>import, domestic</del> <u>import</u> or export).</p>	<p>P <b>COSAVE</b> Domestic issues should not be part of an ISPM. To emphasize that the authorization of entities is an NPPO decision. <i>Category : TECHNICAL</i></p>

254	44	Une ONPV devrait déterminer si elle autorise des organismes à mener des actions phytosanitaires. Parmi les actions phytosanitaires qu'une ONPV peut autoriser un organisme à mener pour son compte figurent le suivi, l'échantillonnage, l'inspection, l'analyse, la surveillance, le traitement, la quarantaine post-entrée, la destruction, la supervision et les vérifications et audits. En vertu d'un programme d'autorisation, les organismes peuvent mener des actions phytosanitaires dans le cadre d'un système de réglementation phytosanitaire (des importations, des échanges nationaux ou des exportations).	C	<b>Haiti</b> Je crains que de telles mesures n'augmentent pas le risqué d'introduction d'organismes nuisibles dans les pays moins avancés qui font déjà face à un déficit d'autorités sur les entreprises d'importations et d'exportations. En gros, c'est la barrière libre. <i>Category : TECHNICAL</i>
255	44	Une ONPV devrait déterminer si elle autorise des organismes à mener des actions phytosanitaires. Parmi les actions phytosanitaires qu'une ONPV peut autoriser un organisme à mener pour son compte figurent le suivi, l'échantillonnage, l'inspection, l'analyse, la surveillance, le traitement, la quarantaine post-entrée, la destruction, la <del>supervision et supervision</del> , les vérifications <del>de conformité</del> et <del>des</del> audits. En vertu d'un programme d'autorisation, les organismes peuvent mener des actions phytosanitaires dans le cadre d'un système de réglementation phytosanitaire (des importations, des échanges nationaux ou des exportations).	P	<b>Chad</b> un apport pour compléter la deuxième phase <i>Category : EDITORIAL</i>
256	44	Una ONPF debería determinar si autoriza a ciertas entidades a emprender acciones fitosanitarias. Como ejemplos de acciones fitosanitarias que podrá emprender una entidad con autorización de una ONPF y en su nombre cabe citar el monitoreo, el muestreo, la inspección, la realización de pruebas, la vigilancia, el tratamiento, la cuarentena posentrada, la destrucción, <del>la supervisión y la auditoría</del> . En el marco de un programa de autorizaciones, las entidades podrán emprender acciones fitosanitarias dentro de un sistema de reglamentación fitosanitaria (de importación, nacional o de exportación).	P	<b>OIRSA</b> La supervisión y auditoría no son acciones fitosanitarias sino elementos de control de calidad.  Se tendría que explicar a qué se refiere el término doméstico. <i>Category : TECHNICAL</i>
257	44	Una ONPF debería determinar si autoriza a ciertas entidades a emprender acciones fitosanitarias. Como ejemplos de acciones fitosanitarias que podrá emprender una entidad con autorización <del>y supervisión</del> de una <del>ONPF y en su nombre cabe citar ONPF</del> , el monitoreo, el muestreo, la inspección, la realización de pruebas, la vigilancia, el tratamiento, la cuarentena posentrada, la destrucción, la supervisión y la auditoría. En el marco de un programa de autorizaciones, las entidades podrán emprender acciones fitosanitarias dentro de un sistema de reglamentación fitosanitaria (de importación, nacional o de exportación).	P	<b>OIRSA</b> La ONPF es la responsable de autorizar y supervisar estas actividades concediendo facultades específicas para estas acciones. <i>Category : TECHNICAL</i>
258	44	Una ONPF debería determinar si autoriza a ciertas entidades a emprender acciones fitosanitarias. Como ejemplos de acciones fitosanitarias que podrá emprender una entidad con autorización de una ONPF y en su nombre cabe citar el <del>monitoreo, el</del> muestreo, la inspección, la realización de pruebas, la vigilancia, el tratamiento, la cuarentena posentrada, la destrucción, la supervisión y la auditoría. En el marco de un programa de autorizaciones, las entidades podrán emprender acciones	P	<b>Colombia</b> El término de monitoreo se debe eliminar, teniendo en cuenta que está implícito en el término de vigilancia. <i>Category : SUBSTANTIVE</i>

		fitosanitarias dentro de un sistema de reglamentación fitosanitaria (de importación, nacional o de exportación).		
259	44	Una ONPF debería determinar si <del>autoriza a ciertas</del> <u>autoriza</u> entidades a emprender acciones fitosanitarias. Como ejemplos de acciones fitosanitarias que podrá emprender una entidad con autorización <u>y supervisión</u> de una ONPF y en su nombre cabe citar el monitoreo, el muestreo, la inspección, la realización de pruebas, la vigilancia, el tratamiento, la cuarentena posentrada, la destrucción, <del>la supervisión y la auditoría</del> . En el marco de un programa de autorizaciones, las entidades podrán emprender acciones fitosanitarias dentro de un sistema de reglamentación fitosanitaria (de importación, nacional o de exportación).	P	<p><b>Costa Rica</b> Coherencia con el párrafo anterior La ONPF es la responsable de autorizar y supervisar estas actividades concediendo facultades específicas para estas acciones.</p> <p>La supervisión y auditoría no son acciones fitosanitarias sino elementos de control de calidad.</p> <p>Se tendría que explicar a qué se refiere el término doméstico.</p> <p><i>Category : TECHNICAL</i></p>
260	44	Una ONPF debería determinar si autoriza a ciertas entidades a emprender acciones fitosanitarias. Como ejemplos de acciones fitosanitarias que podrá emprender una entidad con autorización <u>y supervisión</u> de una ONPF y <del>en su nombre cabe citar</del> <u>estará facultado para las siguientes actividades</u> el monitoreo, el muestreo, la inspección, la realización de pruebas, la vigilancia, el tratamiento, la cuarentena posentrada, la destrucción, la supervisión y la auditoría. En el marco de un programa de autorizaciones, las entidades podrán emprender acciones fitosanitarias dentro de un sistema de reglamentación fitosanitaria (de importación, nacional o de exportación).	P	<p><b>Nicaragua</b> Una ONPF debería determinar si autoriza a ciertas entidades a emprender acciones fitosanitarias. Como ejemplos de acciones fitosanitarias que podrá emprender una entidad con autorización y supervisión de una ONPF y en su nombre cabe estar facultado para las siguientes actividades citar el monitoreo, el muestreo, la inspección, la realización de pruebas, la vigilancia, el tratamiento, la cuarentena pos entrada, la destrucción, la supervisión y la auditoría. En el marco de un programa de autorizaciones, las entidades podrán emprender acciones fitosanitarias dentro de un sistema de reglamentación fitosanitaria (de importación, nacional o de exportación).</p> <p><i>Category : TECHNICAL</i></p>
261	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply <u>some or all</u> elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.	P	<p><b>Canada</b> Provides greater clarity. <i>Category : SUBSTANTIVE</i></p>
262	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. <del>NPPOs should apply this standard when</del>	P	<p><b>Panama</b> See comment in paragraph 28. In addition the NPPO will determine the nature of the authorization arrangement with all entities.</p> <p><i>Category : TECHNICAL</i></p>

		<del>authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.</del>	
263	45	<del>In this <del>standard standard</del>, “entities” include the providers of phytosanitary action (e.g. <del>can be</del> individuals, organizations, <del>businesses) enterprises</del> and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). <del>In some cases, authorization</del> Authorization of entities may require an NPPO to <del>approve authorize</del> individuals within the entity (such as those responsible for specific phytosanitary actions), <del>relevant documentation</del> approve facilities or quality management system documents, their facilities, or any combination of these. <del>NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.</del></del>	<p>P <b>EPPO</b> The cases are not specified in the standard therefore better delete these words, it is in any case a 'may'.</p> <p>Comma added.</p> <p>According to Appendix 4 (General recommendations on the use of terms in ISPMs) of the "IPPC style guide for standards and meeting documents", in ISPMs and other IPPC documents it is recommended the term "authorize" to be used "to give authority to a person or a body to do something".</p> <p>"Quality management systems documents" are the type of documents which may be approved (see paragraphs 66, 85 and 97).</p> <p>More appropriate wording for a standard. If the NPPO decides to apply elements of these standards, then it should determine the nature of the authorization arrangement.</p> <p>It should be clearly explained what entities include. The Standard needs separate sections on the requirements for private and public entities, and the Standard also needs to cover individuals.</p> <p>This is a more clear term Category : EDITORIAL</p>
264	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, <del>businesses) enterprises</del> and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.	<p>P <b>European Union</b> This is a more clearer term. Category : EDITORIAL</p>
265	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such	<p>P <b>European Union</b> The cases are not specified in the standard therefore better delete these words, it is in any case a 'may'.</p>

		as equipment, laboratories, treatment enclosures). <del>In some cases, authorization</del> <u>Authorization</u> of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.		<i>Category : TECHNICAL</i>
266	45	In this standard “entities” <del>include the providers of phytosanitary action (e.g. can be</del> individuals, organizations, <del>businesses)</del> <u>businesses</u> and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. <del>NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other</del> <u>government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.</u>	P	<b>European Union</b> It should be clearly explained what entities include.  The Standard needs separate sections on the requirements for private and public entities, and the Standard also needs to cover individuals (see also our general comment).  <i>Category : SUBSTANTIVE</i>
267	45	In this <del>standard standard,</del> “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.	P	<b>European Union</b> Comma added. <i>Category : EDITORIAL</i>
268	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity <del>will should</del> <u>will</u> determine the nature of the authorization arrangement.	P	<b>European Union</b> More appropriate wording for a standard. If the NPPO decides to apply elements of these standards, then it should determine the nature of the authorization arrangement. <i>Category : TECHNICAL</i>

269	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to <del>approve</del> authorize individuals within the entity (such as those responsible for specific phytosanitary actions), <u>approve facilities of quality management system documents, other</u> relevant documentation, <del>their facilities,</del> or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.	P	<b>European Union</b> According to Appendix 4 (General recommendations on the use of terms in ISPMs) of the "IPPC style guide for standards and meeting documents", in ISPMs and other IPPC documents it is recommended the term "authorize" to be used "to give authority to a person or a body to do something". "Quality management systems documents" are the type of documents which may be approved (see paragraphs 66, 85 and 97).  <i>Category : TECHNICAL</i>
270	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. <del>NPPOs-NPPO's</del> should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.	P	<b>Ghana</b>  <i>Category : EDITORIAL</i>
271	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific <del>phytosanitary-Phytosanitary</del> actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.	P	<b>Ghana</b>  <i>Category : EDITORIAL</i>
272	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. <u>Conditions for entities to be authorized to perform phytosanitary actions(authorized definite phytosanitary action and its</u>	P	<b>China</b> To allow this standard be more feasible. <i>Category : SUBSTANTIVE</i>

		<u>corresponding specific requirements for personnel, documents, equipment, facilities etc</u> ). NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.		
273	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing <u>public entities, such as any entity carrying out phytosanitary actions. This may include private entities or</u> other government departments. <del>In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.</del>	P	<b>New Zealand</b> The same standard should apply irrespective of who is carrying out the phytosanitary activity, to avoid resulting in a different level of delivery. Also see general comments. <i>Category : SUBSTANTIVE</i>
274	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing <u>public entities, such as any entity carrying out phytosanitary actions. This may include private entities or</u> other government departments. <del>In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.</del>	P	<b>APPPC</b> (102) New Zealand (7 Sep 2018 6:35 AM) The same standard should apply irrespective of who is carrying out the phytosanitary activity, to avoid resulting in a different level of delivery. Also see general comments. <i>Category : SUBSTANTIVE</i>
275	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. <del>NPPOs should apply this standard when authorizing private entities.</del> NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.	P	<b>Antigua and Barbuda</b> <i>Category : EDITORIAL</i>

276	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of <u>private</u> entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.	P	<b>Antigua and Barbuda</b> The proposed amendment is to remove an extraneous, redundant sentence and to improve clarity. <i>Category : EDITORIAL</i>
277	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. <del>NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.</del>	P	<b>Costa Rica</b> See comment in paragraph 28. In addition the NPPO will determine the nature of the authorization arrangement with all entities. <i>Category : TECHNICAL</i>
278	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.	C	<b>South Africa</b> Insertion of the word “legal” to align it with point 28 above. <i>Category : SUBSTANTIVE</i>
279	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as <del>equipment, laboratories, treatment enclosures</del> equipment). In some cases, authorization of entities may require an NPPO to approve individuals within the entity ( <del>such as those</del> responsible for specific phytosanitary <del>actions</del> actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other	P	<b>Montenegro</b> <i>Category : TECHNICAL</i>

		government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.	
280	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.	<p>C</p> <p><b>Ukraine</b>  According to Article IV IPPC, an NPPO shall to the best of its ability ensure the establishment of an official national quarantine and plant protection organization performing main obligations as set in the mentioned article. Performing of phytosanitary controls is a function of the state that has the task to maintain the phytosanitary safety of the country. The phytosanitary control is not a matter of commerce or business.  Functions of NPPO may be delegated only when an NPPO cannot perform this or that function due to circumstances.  NPPO control functions for exports and imports shall not be delegated to entities (business) as the business pursues financial benefits. Performance of business may not be always objective.  If a decision to delegate NPPO’s functions is taken, an NPPO shall notify partner countries and ensure maximum control of performance of functions delegated to business. NPPO has to develop and improve in its country the phytosanitary systems, meet commitments undertaken when signing the IPPC.  The draft standard has no clear definition of functions that may be delegated. There should be clear definition what responsibility and functions shall be with the state and which ones with entities.  Suggested version:  An NPPO shall to the best of its ability perform phytosanitary actions. If necessary, an NPPO may authorize an entity to perform monitoring, treatment, destruction, localization and liquidation.</p> <p><i>Category : SUBSTANTIVE</i></p>
281	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. <del>NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.</del>	<p>P</p> <p><b>Argentina</b>  See comment in paragraph 28.  In addition the NPPO will determine the nature of the authorization arrangement with all entities.</p> <p><i>Category : TECHNICAL</i></p>
282	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as	<p>P</p> <p><b>Uruguay</b>  See comment in paragraph 28. In addition the NPPO will determine the nature of the authorization arrangement with all entities.</p>

		those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. <del>NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.</del>		<i>Category : SUBSTANTIVE</i>
283	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.	C	<b>Mexico</b> It must be specified what elements the public entities and private entities that the NPPO authorizes must comply, since the perception of revenues and resources is different. <i>Category : SUBSTANTIVE</i>
284	45	In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. <del>NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement.</del>	P	<b>COSAVE</b> See comment in paragraph 28. In addition the NPPO will determine the nature of the authorization arrangement with all entities. <i>Category : TECHNICAL</i>
285	45	En la presente norma, se consideran “entidades” los proveedores de la acción fitosanitaria (ya sean particulares, organizaciones o empresas) y, en caso pertinente, sus instalaciones (como el equipo, los laboratorios o los recintos de tratamiento). En algunos casos, la autorización de entidades podrá requerir que una ONPF dé su aprobación a personas concretas dentro de la entidad (por ejemplo, las responsables de acciones fitosanitarias específicas), a la documentación pertinente, a sus instalaciones o a cualquier combinación de estas. Las ONPF deberían aplicar la presente norma cuando autoricen a entidades <del>privadas. Las ONPF también podrán decidir aplicar elementos de la presente norma cuando autoricen privadas o</del> a entidades públicas, por ejemplo otros departamentos gubernamentales. En tales casos, la ONPF y la entidad pública determinarán la naturaleza del acuerdo de autorización.	P	<b>OIRSA</b> Simplifica el párrafo, no se ve la necesidad de separar entre una entidad privada o pública <i>Category : TECHNICAL</i>

286	45	En la presente norma, se consideran “entidades” los proveedores de la acción fitosanitaria (ya sean particulares, organizaciones o empresas) y, en caso pertinente, sus instalaciones (como el equipo, los laboratorios o los recintos de tratamiento). En algunos casos, la autorización de entidades podrá requerir que una ONPF dé su aprobación a personas concretas dentro de la entidad (por ejemplo, las responsables de acciones fitosanitarias específicas), a la documentación pertinente, a sus instalaciones o a cualquier combinación de estas. Las ONPF deberían aplicar la presente norma cuando autoricen a entidades privadas. Las ONPF también podrán decidir aplicar elementos de la presente norma cuando autoricen a entidades públicas, por ejemplo otros departamentos gubernamentales. En tales casos, la ONPF y la entidad pública determinarán la naturaleza del acuerdo de autorización.	P	<b>OIRSA</b> Lo elimina de traslada al apartado de definiciones, ya que se considera más pertinente. <i>Category : EDITORIAL</i>
287	45	En la presente norma, se consideran “entidades” los proveedores de la acción fitosanitaria (ya sean particulares, organizaciones o empresas) y, en caso pertinente, sus instalaciones (como el equipo, los laboratorios o los recintos de tratamiento). En algunos casos, la autorización de entidades podrá requerir que una ONPF dé su aprobación a personas concretas dentro de la entidad (por ejemplo, las responsables de acciones fitosanitarias específicas), a la documentación pertinente, a sus instalaciones o a cualquier combinación de estas. Las ONPF deberían aplicar la presente norma cuando autoricen a entidades privadas. Las ONPF también podrán decidir aplicar elementos de la presente norma cuando autoricen a entidades públicas, por ejemplo otros departamentos gubernamentales. En tales casos, la ONPF y la entidad pública determinarán la naturaleza del acuerdo de autorización.	C	<b>OIRSA</b> Habria que considerar la aplicabilidad de esta propuesta ya que podriamos asumir que la razon para que una ONPF autorice a terceros es porque no cuenta con los recursos públicos para ejecutar ciertas actividades. Si otra entidad pública cuenta con los recursos entonces se puede concluir que existen problemas de priorización dentro de una parte contratante. Este comentario más bien es en relación a la futura aplicación e implementación de la norma. <i>Category : SUBSTANTIVE</i>
288	46	NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The NPPO’s legal framework should allow <del>itto-it to</del> suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme.	P	<b>Canada</b> <i>Category : EDITORIAL</i>
289	46	NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The NPPO’s legal framework should allow <del>itto-it to</del> suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme.	P	<b>Viet Nam</b> <i>Category : SUBSTANTIVE</i>
290	46	<del>NPPOs-If authorizing entities, CPs</del> should ensure that their legal framework enables them to authorize entities to perform phytosanitary <del>actions-on their behalf</del> actions. The <del>NPPO’s-country’s</del> legal framework should allow <del>itto-the NPPO to</del> suspend, revoke and reinstate authorizations, <del>and should also enable an authorized entity to withdraw from the authorization programme.</del>	P	<b>EPPO</b> This should not be part of the legal framework but of the agreement.  To stress that it is up to the NPPO whether tasks are delegated to authorized entities. <i>Category : SUBSTANTIVE</i>
291	46	<del>NPPOs should ensure CPs</del> that <del>their legal framework enables them have decided</del> to authorize entities to perform phytosanitary actions <del>on-should ensure that their</del>	P	<b>European Union</b> To stress that it is up to the NPPO whether tasks are delegated to authorized entities.

		<del>be half</del> legal framework enables them to do so. The <del>NPPO's country's</del> legal framework should allow <del>itto the NPPO to</del> suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme.		<i>Category : SUBSTANTIVE</i>
292	46	NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The NPPO's legal framework should allow <del>itto it to</del> suspend, revoke and reinstate authorizations, <del>and should also enable an authorized entity to withdraw from the authorization programme.</del>	P	<b>European Union</b> This may not be part of the legal framework. <i>Category : SUBSTANTIVE</i>
293	46	NPPOs should ensure that their legal framework enables them to authorize entities to perform <del>phytosanitary</del> <b>Phytosanitary</b> actions on their behalf. The NPPO's legal framework should allow itto suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme.	P	<b>Ghana</b> <i>Category : EDITORIAL</i>
294	46	NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. <del>In the process of establishing a legal framework, the NPPO may establish a temporary contract or memorandum of understanding with the entity to be authorized.</del> The NPPO's legal framework should allow <del>itto it to</del> suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme.	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> This is a possibility that some countries may have. <i>Category : SUBSTANTIVE</i>
295	46	<del>NPPOs</del> <b>If authorizing entities, CPs</b> should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on <del>their behalf</del> <b>behalf of the the NPPOs.</b> The <del>NPPO's Countries'</del> legal framework should allow itto suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme.	P	<b>IPPC Regional Workshop Central Asia &amp; Central Europe</b> With the amendments proposed the section reads as follows, in Russian:  При уполномочивании юридических лиц, Договаривающиеся стороны должны обеспечить, чтобы их правовая база позволяла передавать полномочия юридическим лицам на осуществление фитосанитарных действий от мени стран НОКЗР. Правовая база Стран должна позволять ей приостанавливать, отзывать и возвращать полномочия, а также позволять уполномоченному юридическому лицу аннулировать программу передачи полномочий. <i>Category : SUBSTANTIVE</i>
296	46	NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their <del>be half</del> <b>behalf when authorizing entities. In such cases.</b> The NPPO's legal framework should allow <del>itto it to</del> suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme.	P	<b>Japan</b> Legal framework should be considered when authorizing entities. <i>Category : SUBSTANTIVE</i>
297	46	NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The NPPO's legal framework	C	<b>Jamaica</b> Updating legislation to cover international agreements can be lengthy and time consuming activity. In the process of establishing a legal framework, the NPPO may consider the establishment of a temporary MoU with the entity to be

		should allow itto suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme.		authorized. <i>Category : SUBSTANTIVE</i>
298	46	NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. <del>The</del> <del>In such cases, the</del> NPPO's legal framework should allow <del>itto-it to</del> suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme.	P	<b>APPPC</b> (25) Japan (2 Sep 2018 10:15 AM) Legal framework should be considered when authorizing entities. <i>Category : SUBSTANTIVE</i>
299	46	NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The NPPO's legal framework should allow <del>itto-it to</del> suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme.	P	<b>APPPC</b> (104) New Zealand (7 Sep 2018 6:41 AM) (82) Singapore (5 Sep 2018 12:44 PM) Missing space <i>Category : EDITORIAL</i>
300	46	NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The NPPO's legal framework should allow itto suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme.	C	<b>IPPC Regional Workshop Africa</b> NPPOs of developing countries may have potential implementation issues namely:: 1. It is difficult to easily enact laws to undertake certain phytosanitary measures. 2. It may store implementation of this ISPM in developing countries. 3. In this case NPPOs may use existing powers according to IPPS guardlines to authorize entities <i>Category : SUBSTANTIVE</i>
301	46	NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The NPPO's legal framework should allow <del>itto-it to</del> suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme.	P	<b>Philippines</b> <i>Category : EDITORIAL</i>
302	46	NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The NPPO's legal framework should allow itto suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme.	C	<b>Ukraine</b> We do not support this part in whole  An NPPO is authorized by the government to perform phytosanitary control. Delegating functions to other government departments is inexpedient as every government agency has to perform its own functions to fulfil certain tasks. Moreover, other government departments – to perform certain functions – will need special qualification as required by ISPM No. 7. <i>Category : SUBSTANTIVE</i>
303	46	NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The NPPO's legal framework should allow <del>itto-it to</del> suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme.	P	<b>Singapore</b> <i>Category : EDITORIAL</i>

304	46	<p><del>Las ONPF deberían asegurarse de que su marco jurídico les permita autorizar a entidades a emprender acciones fitosanitarias en su nombre. El marco jurídico de la ONPF debería permitir a esta suspender, revocar y restablecer las autorizaciones, y también debería permitir que una entidad autorizada se retire del programa de autorizaciones. Las ONPF deberían asegurar que su marco jurídico les permita autorizar a entidades a emprender acciones fitosanitarias en su nombre. El marco jurídico de la ONPF debería permitir a esta inhabilitar, suspender, revocar y restablecer las entidades autorizadas, y también debería permitir que una entidad autorizada se retire del programa de autorizaciones.</del></p> <p><u>El marco jurídico de la ONPF debería permitir a esta tomar las medidas necesarias para garantizar el cumplimiento de las entidades autorizadas.</u></p>	P	<p><b>Colombia</b></p> <p>Incluir que el marco jurídico de las ONPF debe permitir tomas las medidas necesarias para garantizar el cumplimiento de las entidades autorizadas.</p> <p>De igual manera se requiere cambiar "autorizaciones" por "entidades autorizadas"</p> <p><i>Category : SUBSTANTIVE</i></p>
305	46	<p>Las ONPF deberían asegurarse de que su marco jurídico les permita autorizar a entidades a <del>emprender-ejecutar</del> acciones fitosanitarias en su nombre. El marco jurídico de la ONPF debería permitir a esta suspender, revocar y restablecer las autorizaciones, y también debería permitir que una entidad autorizada se retire del programa de autorizaciones.</p>	P	<p><b>Costa Rica</b></p> <p><i>Category : EDITORIAL</i></p>
1. Development of Authorization Programme				
306	47	<p><b>1. Development of Authorization Programme</b> <u>Process</u></p>	P	<p><b>EPPO</b></p> <p>The term "authorization programme" is not clear. More precise wording suggested in consistency with title of section 4 (Process for Audits). The term "process" is already used in the standard, e.g. in paragraph 43 and in some of the indents following paragraph 48.</p> <p><i>Category : TECHNICAL</i></p>
307	47	<p><b>1. Development of Authorization Programme</b> <u>Process</u></p>	P	<p><b>European Union</b></p> <p>The term "authorization programme" is not clear. More precise wording suggested in consistency with the title of section 4 (Process for Audits). The term "process" is already used in the standard, e.g. in paragraph 43 and in some of the indents following paragraph 48.</p> <p><i>Category : TECHNICAL</i></p>
308	47	<p><del>1.2. Authorization Programme</del> <u>Development of Authorization Programme</u></p>	P	<p><b>APPPC</b></p> <p>(47) Thailand (5 Sep 2018 12:03 PM)</p> <ul style="list-style-type: none"> <li>- re-numbering</li> <li>- The term "Development" should be deleted due to its redundancy.</li> </ul> <p><i>Category : EDITORIAL</i></p>

309	47	<b>1. Development of Authorization Programme</b>	C	<b>IPPC Regional Workshop Africa</b> NPPOs should ensure that their Legal framework caters for implementation of the standard <i>Category : SUBSTANTIVE</i>
310	47	<b>12. Development of Authorization Programme</b>	P	<b>Thailand</b> The term "Development" should be deleted due to its redundancy. <i>Category : EDITORIAL</i>
311	48	The NPPO should define its objectives <del>for, and develop</del> <u>requirements for developing</u> , an authorization programme <del>that is</del> appropriate for its purposes. When developing an authorization programme, the NPPO should:	P	<b>Panama</b> The NPPO should define also the requirements <i>Category : TECHNICAL</i>
312	48	<del>The</del> <u>If authorizing entities, the</u> NPPO should define <del>its</del> <u>the scope and the</u> objectives <del>for, and develop, develop</del> an authorization <del>programme</del> <u>process</u> that is appropriate for its purposes. When developing an authorization <del>programme</del> <u>process</u> , the NPPO should:	P	<b>EPPO</b> Easier to read.  To stress that it is up to the NPPO whether tasks are delegated to authorized entities. The scope is also an important element. The term "authorization programme" is not clear. The term "process" is suggested (it is already used in the standard, e.g. in paragraph 43 and in some of the indents following paragraph 48). <i>Category : TECHNICAL</i>
313	48	<del>The</del> <u>If authorizing entities, the</u> NPPO should define <del>its</del> <u>the scope and the</u> objectives for, and develop, an authorization programme that is appropriate for its purposes. When developing an authorization programme, the NPPO should:	P	<b>European Union</b> To stress that it is up to the NPPO whether tasks are delegated to authorized entities. The scope is also an important element. <i>Category : TECHNICAL</i>
314	48	The NPPO should define its objectives <del>for, and develop, develop</del> an authorization programme that is appropriate for its purposes. When developing an authorization programme, the NPPO should:	P	<b>European Union</b> Easier to read. <i>Category : EDITORIAL</i>
315	48	The NPPO should define its objectives for, and develop, an authorization <del>programme</del> <u>process</u> that is appropriate for its purposes. When developing an authorization <del>programme</del> <u>process</u> , the NPPO should:	P	<b>European Union</b> The term "authorization programme" is not clear. The term "process" is suggested (it is already used in the standard, e.g. in paragraph 43 and in some of the indents following paragraph 48). <i>Category : TECHNICAL</i>
316	48	The NPPO should define its objectives <del>for</del> <u>requirements for developing, and develop</u> , an authorization programme <del>that is</del> appropriate for its purposes. When developing an authorization programme, the NPPO should:	P	<b>Costa Rica</b> The NPPO should define also the requirements <i>Category : TECHNICAL</i>
317	48	<del>The</del> <u>If the national law allows it, the</u> NPPO should define its objectives for, and develop, an authorization programme that is appropriate for its purposes. When developing an authorization programme, the NPPO should:	P	<b>NEPPO</b> <i>Category : SUBSTANTIVE</i>
318	48	The NPPO <del>should</del> define its objectives for, and develop, an authorization programme that is appropriate for its purposes. When developing an authorization programme, the NPPO should:	P	<b>Montenegro</b> <i>Category : TECHNICAL</i>

319	49	develop and establish the requirements that must be met in order for an entity to be authorized to carry out specific phytosanitary actions on behalf of the NPPO  <u>49 bis: - identify the risks which may arise from authorization and which need to be managed through the authorization process</u>	P	<b>European Union</b> New indent added. Risks need to be identified so that they can be managed effectively including through the development of contingency plans. See para 59. <i>Category : SUBSTANTIVE</i>
320	49	develop and establish the requirements that must be met in order for an entity to be authorized to carry out specific phytosanitary <del>actions on behalf of the NPPO</del> <u>actions</u>	P	<b>European Union</b> These words are not needed and may create confusion, see also remark on paragraph 44. <i>Category : SUBSTANTIVE</i>
321	49	<del>develop and establish set</del> the requirements that must be met <del>in order for by</del> an entity to be authorized to carry out specific phytosanitary actions on behalf of the NPPO	P	<b>European Union</b> Better wording. <i>Category : EDITORIAL</i>
322	49	<del>develop and establish set</del> the requirements that must be met <del>in order for by</del> an entity to be authorized to carry out specific phytosanitary <del>actions on behalf of</del> <u>actions</u>  <u>49 bis: identify the NPPO risks which may arise from authorization and which need to be managed through the authorization process</u>	P	<b>EPPO</b> These words are not needed and may create confusion, see also remark on paragraph 44.  Better wording  New indent added. Risks need to be identified so that they can be managed effectively including through the development of contingency plans. See para 59. <i>Category : SUBSTANTIVE</i>
323	49	develop and establish the requirements that must be met in order for an entity to be authorized to carry out specific <del>phytosanitary</del> <u>Phytosanitary</u> actions on behalf of the NPPO	P	<b>Ghana</b> <i>Category : EDITORIAL</i>
324	49	develop and establish the requirements that must be met in order for an entity to be authorized to carry out specific phytosanitary actions on <del>its</del> behalf <del>of the NPPO</del>	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> <i>Category : EDITORIAL</i>
325	49	develop and establish the requirements that must be met in order for an entity to be authorized to carry out specific phytosanitary actions on behalf of the NPPO	C	<b>Ukraine</b> The standard should define criteria with requirements that must be met in order for an entity to be authorized to carry out specific phytosanitary actions <i>Category : SUBSTANTIVE</i>
326	49	develop and establish the requirements that must be met in order for an entity to be authorized <del>to carry out specific phytosanitary actions on behalf of the NPPO</del>	P	<b>Argentina</b> To avoid repetition. <i>Category : EDITORIAL</i>
327	49	develop and establish the requirements that must be met in order for an entity to be <del>authorized to carry out specific phytosanitary actions on behalf of the NPPO</del> <u>authorized</u>	P	<b>Uruguay</b> To avoid repetition <i>Category : EDITORIAL</i>
328	49	develop and establish the requirements that must be met in order for an entity to be <del>authorized to carry out specific phytosanitary actions on behalf of the NPPO</del> <u>authorized.</u>	P	<b>COSAVE</b> To avoid repetition. <i>Category : EDITORIAL</i>

329	49	formular y establecer los requisitos que deben cumplirse para que una entidad sea autorizada a emprender acciones fitosanitarias específicas en nombre de la ONPF;  <u>- Contar con procedimientos y herramientas que permita realizar seguimiento en tiempo real de las actividades asignadas a la empresa autorizada.</u>	P	<b>Colombia</b> Incluir que la ONPF cuente con mecanismo de seguimiento que permita llevar control en tiempo real, permitirá verificar el estado de cumplimiento de cada actividad. <i>Category : SUBSTANTIVE</i>
330	49	formular y establecer los requisitos que deben cumplirse para que una entidad sea autorizada a emprender acciones fitosanitarias específicas en nombre de la ONPF;  <u>- Elaborar procedimientos de manejo y entrega de la información, así como de la confidencialidad de esta.</u>	P	<b>Colombia</b> Incluir procedimientos de manejo y entrega de la información, así como la confidencialidad de ésta. La información levantada por las entidades autorizadas a realizar acciones fitosanitarias, solo debe ser entregada a la ONPF contratante. <i>Category : SUBSTANTIVE</i>
331	49	formular y establecer los requisitos que deben cumplirse para que una entidad sea autorizada a <del>emprender ejecutar</del> acciones fitosanitarias específicas en nombre de la ONPF;	P	<b>Costa Rica</b>  <i>Category : EDITORIAL</i>
332	50	develop an initiation and approval process for authorizing entities  <u>50 bis: - determine a validity period for authorization, and arrangements for review and prolongation if appropriate</u>	P	<b>European Union</b> A new indent has been added as it is essential to set duration for authorization. <i>Category : TECHNICAL</i>
333	50	develop an <del>initiation and</del> approval process for authorizing entities	P	<b>European Union</b> Not clear what the initiation process is. <i>Category : SUBSTANTIVE</i>
334	50	develop an <del>initiation and</del> approval process for authorizing entities  <u>50 bis: determine a validity period for authorization, and arrangements for review and prolongation if appropriate</u>	P	<b>EPPO</b> Not clear what the initiation process is.  New indent added. Risks need to be identified so that they can be managed effectively including through the development of contingency plans. See para 59. <i>Category : SUBSTANTIVE</i>
335	50	develop an initiation and approval process for authorizing entities	C	<b>Ukraine</b> define conditions or criteria that must be met in order for an entity to be authorized. <i>Category : SUBSTANTIVE</i>
336	50	develop an <del>initiation application</del> and approval process for authorizing entities	P	<b>Argentina</b> The NPPO should develop a process describing how entities should apply for authorization. <i>Category : TECHNICAL</i>
337	50	develop an <del>initiation application</del> and approval process for authorizing entities	P	<b>Uruguay</b> The NPPO should develop a process describing how entities should apply for authorization <i>Category : TECHNICAL</i>
338	50	develop an <del>initiation application</del> and approval process for authorizing entities	P	<b>COSAVE</b> The NPPO should develop a process describing how entities should apply for authorization.

				<i>Category : TECHNICAL</i>
339	50	elaborar un procedimiento de <del>inicio</del> - <u>aplicación</u> y aprobación para la autorización de entidades;	P	<b>Costa Rica</b> <i>Category : EDITORIAL</i>
340	51	develop a training plan to ensure that NPPO personnel <del>are trained and obtain</del> <u>have</u> the expertise to manage the authorization programme	P	<b>European Union</b> Better English. <i>Category : EDITORIAL</i>
341	51	develop a training plan to ensure that NPPO personnel are trained and obtain the expertise to manage the authorization <del>programme</del> <u>process</u>	P	<b>European Union</b> The term "authorization programme" is not clear. The term "process" is suggested (it is already used in the standard, e.g. in paragraph 43 and in some of the indents following paragraph 48). <i>Category : TECHNICAL</i>
342	51	develop a training plan to ensure that NPPO personnel <del>are trained and obtain</del> <u>have</u> the expertise to manage the authorization <del>programme</del> <u>process</u>	P	<b>EPPO</b> The term "authorization programme" is not clear. The term "process" is suggested (it is already used in the standard, e.g. in paragraph 43 and in some of the indents following paragraph 48).  Better English <i>Category : EDITORIAL</i>
343	51	develop a training plan to ensure that NPPO personnel <u>responsible for managing the authorization programmed</u> are trained and obtain the expertise to manage the authorization programme	P	<b>APPPC</b> (120) New Zealand (7 Sep 2018 7:30 AM) <i>Category : EDITORIAL</i>
344	52	identify minimum training, skills and competency requirements for entities to perform phytosanitary actions, these requirements <del>being at least should be</del> equivalent to those required for NPPO personnel to undertake the same phytosanitary actions	P	<b>Panama</b> For consistency with the ISPM 7. <i>Category : TECHNICAL</i>
345	52	identify minimum training, skills and competency requirements for entities to perform phytosanitary actions, these requirements being at least equivalent to those required for NPPO personnel to undertake the same phytosanitary actions  <u>- Develop a system to provide training for the authorized entities</u>	P	<b>Sri Lanka</b> The entities should be aware on the new standards, new phytosanitary requirements of other importing contracting parties, and any changes in procedures /technologies etc.  <i>Category : TECHNICAL</i>
346	52	identify minimum training, <del>skills</del> - <u>equipment</u> and <del>competency</del> - <u>skills</u> requirements for entities to perform phytosanitary actions, these requirements being at least equivalent to those required for NPPO <del>personnel</del> - <u>resources if they were</u> to undertake the same phytosanitary actions	P	<b>European Union</b> To avoid use of competency which has two different meanings and include equipment which is important for some actions.  The NPPO staff only has to fulfil the requirements if they do perform these actions.  <i>Category : TECHNICAL</i>
347	52	identify minimum training, <del>skills</del> - <u>equipment</u> , and <del>competency</del> - <u>skills</u> requirements for entities to perform phytosanitary actions, these requirements being at least equivalent to those required for NPPO <del>personnel</del> - <u>resources if they were</u> to undertake the same phytosanitary actions	P	<b>EPPO</b> To avoid use of competency which has two different meanings and include equipment which is important for some actions.  The NPPO staff only has to fulfil the requirements if they do

				perform these actions. <i>Category : TECHNICAL</i>
348	52	identify minimum training, skills and competency requirements for entities to perform <del>phytosanitary</del> <u>Phytosanitary</u> actions, these requirements being at least equivalent to those required for NPPO personnel to undertake the same <del>phytosanitary</del> <u>Phytosanitary</u> actions	P	<b>Ghana</b> <i>Category : EDITORIAL</i>
349	52	identify minimum training, <u>equipment</u> , skills and competency requirements for entities to perform phytosanitary actions, these requirements being at least equivalent to those required for NPPO <del>personnel</del> <u>resources</u> to undertake the same phytosanitary actions	P	<b>IPPC Regional Workshop Central Asia &amp; Central Europe</b> With the improvement suggested the paragraph reads as follows in Russian: определить минимальные требования к уровню подготовки, оборудования, навыков и компетенции, необходимые для юридических лиц, чтобы осуществлять фитосанитарные действия. Эти требования должны быть по меньшей мере эквивалентны тем, что предъявляются к человеческим ресурсам НОКЗР для осуществления тех же фитосанитарных действий; <i>Category : TECHNICAL</i>
350	52	identify minimum training, skills and competency requirements for entities to perform phytosanitary actions, these requirements <del>being at least should be</del> equivalent to those required for NPPO personnel to undertake the same phytosanitary actions	P	<b>Costa Rica</b> For consistency with the ISPM 7 <i>Category : TECHNICAL</i>
351	52	identify minimum training, skills and competency requirements for entities to perform phytosanitary actions, these requirements <del>being at least should be</del> equivalent to those required for NPPO personnel to undertake the same phytosanitary actions	P	<b>Argentina</b> For consistency with the ISPM 7. <i>Category : TECHNICAL</i>
352	52	identify minimum training, skills and competency requirements for entities to perform phytosanitary actions, these requirements <del>being at least should be</del> equivalent to those required for NPPO personnel to undertake the same phytosanitary actions	P	<b>Uruguay</b> For consistency with ISPM 7 <i>Category : TECHNICAL</i>
353	52	identify minimum training, skills and competency requirements for entities to perform phytosanitary actions, these requirements <del>being at least should be</del> equivalent to those required for NPPO personnel to undertake the same phytosanitary actions	P	<b>COSAVE</b> For consistency with the ISPM 7. <i>Category : TECHNICAL</i>
354	53	develop a template <del>arrangement, such as a contract or a memorandum of understanding,</del> that can be used to formalize the authorization of entities	P	<b>Panama</b> The formalization of authorization not necessarily implies an arrangement. It is better to keep wording more general. <i>Category : TECHNICAL</i>
355	53	develop a <del>template legally binding</del> arrangement, <del>such as a contract or a memorandum of understanding,</del> that can be used to formalize the authorization of entities	P	<b>European Union</b> To avoid restricting terms which can be used for such an arrangement and make clear that it is legally binding. For example the arrangement could be set out in legislation.

				<i>Category : TECHNICAL</i>
356	53	develop a <del>template arrangement, such as a contract or a memorandum of understanding, legally binding arrangement</del> that can be used to formalize the authorization of entities	P	<b>EPPO</b> To avoid restricting terms which can be used for such an arrangement and make clear that it is legally binding. For example the arrangement could be set out in legislation. <i>Category : TECHNICAL</i>
357	53	develop a <del>template arrangement, such as a contract or a memorandum of understanding, that can be used</del> <u>an agreement</u> to formalize the authorization of entities	P	<b>IPPC Regional Workshop Central Asia &amp; Central Europe</b> With the changes made the paragraph reads as follows, in Russian: разработать для придания официального статуса передач полномочий юридическим лицам; <i>Category : SUBSTANTIVE</i>
358	53	develop a template <del>arrangement, such as a contract or a memorandum of understanding,</del> that can be used to formalize the authorization of entities	P	<b>Costa Rica</b> The formalization of authorization not necessarily implies an arrangement. It is better to keep wording more general.  <i>Category : TECHNICAL</i>
359	53	develop a template arrangement, such as a contract or a memorandum of understanding, that can be used to formalize the authorization of entities	C	<b>Mauritius</b> develop standard operating practices (SOP) for the specific activities (proposed to add this additional requirement to the list) <i>Category : TECHNICAL</i>
360	53	develop a template arrangement, such as a contract or a memorandum of understanding, that can be used to formalize the authorization of entities	C	<b>Ukraine</b> This should be a contract as it the most suitable legal form for that. Suggested version: develop a contract authorizing an entity to perform certain phytosanitary actions, as well as review and update it as and when necessary.  <i>Category : SUBSTANTIVE</i>
361	53	develop a template <del>arrangement, such as a contract or a memorandum of understanding,</del> that can be used to formalize the authorization of entities	P	<b>Argentina</b> The formalization of authorization not necessarily implies an arrangement. It is better to keep wording more general. <i>Category : TECHNICAL</i>
362	53	develop a template <del>arrangement, such as a contract or a memorandum of understanding,</del> that can be used to formalize the authorization of entities	P	<b>Uruguay</b> The formalization of authorization not necessarily implies an arrangement. It is better to keep wording more general. <i>Category : TECHNICAL</i>
363	53	develop a template <del>arrangement, such as a contract or a memorandum of understanding,</del> that can be used to formalize the authorization of entities	P	<b>COSAVE</b> The formalization of authorization not necessarily implies an arrangement. It is better to keep wording more general. <i>Category : TECHNICAL</i>
364	53	mettre au point un document type, par exemple un contrat ou un protocole d'accord, pouvant servir à formaliser l'autorisation <del>d'organismes</del> <u>aux organismes</u> ;	P	<b>Chad</b> correction du paragraphe 53 pour compréhension <i>Category : EDITORIAL</i>
365	54	develop performance <del>criteria</del> <u>criteria and guidelines for the actions performed by the entities</u>	P	<b>European Union</b> It would be useful to have examples of appropriate performance criteria from the phytosanitary perspective in an appendix. <i>Category : TECHNICAL</i>

366	54	develop performance <del>criteria</del> <u>criteria and guidelines for the actions performed by the entities</u>	P	<b>EPPO</b> It would be useful to have examples of appropriate performance criteria from the phytosanitary perspective in an appendix. <i>Category : TECHNICAL</i>
367	54	develop performance <del>criteria</del> <u>criteria and guidelines for the tasks performed by the entities</u>	P	<b>IPPC Regional Workshop Central Asia &amp; Central Europe</b> With the addition the paragraph reads as follows in Russian: разработать критерии результативности и руководства по задачам, выполняемым юридическими лицами <i>Category : TECHNICAL</i>
368	54	develop performance criteria	C	<b>Ukraine</b> It is necessary to define specific performance criteria taking into account the nature of functions authorized to be performed Suggested version: define specific performance criteria taking into account the nature of functions authorized to be performed  <i>Category : SUBSTANTIVE</i>
369	55	develop an audit process and supporting tools, including audit checklists and corrective action reports <u>- Develop a monitoring (or supervision) program to ensure continues compliance and delivery of quality service</u>	P	<b>Panama</b> The concept for audit and monitoring is diferent. Audits are more structure and periodic meanwhile monitoring is more continues and less structure. <i>Category : TECHNICAL</i>
370	55	develop an audit process and supporting tools, including audit checklists and <u>audit report template comprising of form for corrective and preventive</u> action reports	P	<b>Viet Nam</b>  <i>Category : SUBSTANTIVE</i>
371	55	develop an audit process and supporting tools, including audit <del>checklists</del> <u>checklists, audit report template</u> and <u>forms for corrective action reports</u> <del>actions and preventive actions.</del>	P	<b>Korea, Republic of</b>  <i>Category : SUBSTANTIVE</i>
372	55	develop an audit process and supporting tools, including audit checklists and corrective action reports	C	<b>United States of America</b> Ensure consistency with the upcoming ISPM on audit. <i>Category : TECHNICAL</i>
373	55	develop an audit process and supporting tools, including audit <del>checklists</del> <u>checklists, audit report template</u> and <u>forms for corrective and preventive</u> action <del>reports</del> <u>request for nonconformities.</u>	P	<b>APPPC</b> (48) Thailand (5 Sep 2018 12:07 PM) Thailand would like to revise the detail of audit supporting tools to be in line with the common terms used in a certification system. In addition, corrective action report is a document that must be submitted by an auditee after receiving a corrective action request (CAR) from an auditor (NPPO).  <i>Category : SUBSTANTIVE</i>
374	55	develop an audit process and supporting tools, including audit checklists and corrective action <del>reports</del> <u>reports</u>  <u>- Develop and monitoring (or supervision) program to ensure continues compliance and delivery quality service</u>	P	<b>Costa Rica</b> The concept for audit and monitoring is diferent. Audits are more structure and periodic meanwhile monitoring is more continues and less structure.  <i>Category : TECHNICAL</i>

375	55	develop an audit process and supporting tools, including audit checklists and <a href="#">audit report template comprising of forms for corrective and preventive action reports</a> <del>request for nonconformity</del> .	P	<b>Thailand</b> Thailand would like to revise the detail of audit supporting tools to be in line with the common terms used in a certification system. In addition, corrective action report is a document that must be submitted by an auditee after receiving a corrective action request (CAR) from an auditor (NPPO). <i>Category : SUBSTANTIVE</i>
376	55	elaborar un procedimiento de auditoría y herramientas de apoyo, en particular listas de control e informes sobre las acciones correctivas; <a href="#">[56] Develop a monitoring (or supervision) program to ensure continuous compliance and delivery of quality service</a>	P	<b>OIRSA</b> El concepto de auditoría y monitoreo son diferentes. Auditorías son más estructuradas y periódicas mientras que monitoreo es más continuo y menos estructurado. En nuestro contexto se requieren de los dos elementos. <i>Category : SUBSTANTIVE</i>
377	55	elaborar un procedimiento de auditoría y herramientas de apoyo, en particular listas de control e informes sobre las acciones correctivas; <a href="#">- elaborar un programa de monitoreo (o supervisión) para asegura el cumplimiento continuo y entrega de servicio de calidad.</a>	P	<b>Costa Rica</b> El concepto de auditoría y monitoreo son diferentes. Auditorías son más estructuradas y periódicas mientras que monitoreo es más continuo y menos estructurado. En nuestro contexto se requieren de los dos elementos. <i>Category : SUBSTANTIVE</i>
378	56	develop criteria to determine <del>noneonformities</del> <a href="#">non-conformities</a>	P	<b>Japan</b> <i>Category : EDITORIAL</i>
379	57	develop a process to address <del>noneonformity</del> <a href="#">non-conformity</a> , this including, where appropriate, suspending or revoking authorization	P	<b>Japan</b> <i>Category : EDITORIAL</i>
380	58	develop a process for the entity to voluntarily withdraw from the authorization programme  <a href="#">- develop a process for the NPPO to remove/ blacklist the entity from the authorization programme</a>	P	<b>Sri Lanka</b> If the NPPO has identified that the authorized entity has failed performing authorized duties, there should be a way to remove the authorization of the company <i>Category : TECHNICAL</i>
381	58	develop a process for the entity to voluntarily withdraw from the authorization <del>programmearrangement</del>	P	<b>European Union</b> The term "authorization programme" is not clear. The term "arrangement" is suggested (it is used e.g. in paragraphs 45, 53 and 64). <i>Category : TECHNICAL</i>
382	58	develop a process for the <a href="#">authorized</a> entity to voluntarily withdraw from the authorization programme	P	<b>European Union</b> We believe it helps to specify this. <i>Category : EDITORIAL</i>
383	58	develop a process for the <a href="#">authorized</a> entity to voluntarily withdraw from the authorization <del>programmearrangement</del>	P	<b>EPPO</b> The term "authorization programme" is not clear. The term "arrangement" is suggested (it is used e.g. in paragraphs 45, 53 and 64).  it helps to specify this aspect <i>Category : EDITORIAL</i>

384	59	develop <u>and maintain</u> a contingency plan for <del>business</del> continuity <u>of action</u> in the event that an authorized entity <u>had its authorization suspended, revoked or</u> has withdrawn from the authorization <del>programme or had its authorization suspended or</del> <u>revokedprogramme</u>	P	<b>European Union</b> Section improved to put in order of importance the reasons why an entity may lose its authorization. <i>Category : TECHNICAL</i>
385	59	develop a contingency plan for business continuity in the event that an authorized entity has withdrawn from the authorization <del>programme</del> <u>arrangement</u> or had its authorization suspended or revoked	P	<b>European Union</b> The term "authorization programme" is not clear. The term "arrangement" is suggested (it is used e.g. in paragraphs 45, 53 and 64). <i>Category : TECHNICAL</i>
386	59	develop <u>and maintain</u> a contingency plan for <del>business</del> continuity <u>of action</u> in the event that an authorized entity <u>had its authorization suspended, revoked or</u> has withdrawn from the authorization <del>programme or had its authorization suspended or</del> <u>revokedarrangement</u>	P	<b>EPPO</b> The term "authorization programme" is not clear. The term "arrangement" is suggested (it is used e.g. in paragraphs 45, 53 and 64).  Section improved to put in order of importance the reasons why an entity may lose its authorization. <i>Category : TECHNICAL</i>
387	59	develop a contingency plan for business continuity in the event that an authorized entity has withdrawn from the authorization programme or had its authorization suspended or revoked	C	<b>United States of America</b> Please clarify the meaning (possibly with examples). Such requirement can put an unnecessary burden on the NPPO. Usually these are part of a national policy or a specific agreement with third parties. How in practical terms should the NPPO be providing business continuity? Usually the program would stop. <i>Category : TECHNICAL</i>
388	59	develop a contingency plan for business continuity in the event that an authorized <del>entity has withdrawn</del> <u>entity withdraws</u> from the authorization programme or <del>had</del> <u>has</u> its authorization suspended or revoked	P	<b>APPPC</b> (122) New Zealand (7 Sep 2018 7:32 AM) <i>Category : EDITORIAL</i>
389	60	develop a process to ensure efficient and effective communication between the NPPO and the authorized entity. <u>- Develop a process for management of information and also its confidentiality</u>	P	<b>Panama</b> The NPPO should be responsible for the management of the confidentiality of the information <i>Category : TECHNICAL</i>
390	60	develop a process to ensure efficient and effective communication between the NPPO and the authorized entity. <u>- develop a process the list of authorized entities and update the records.</u>	P	<b>Viet Nam</b> to add a new bullet relating to the records and updating the list of authorization entities as a part of the authorization program <i>Category : SUBSTANTIVE</i>
391	60	develop a process to ensure efficient and effective communication between the NPPO and the authorized entity- <u>60 bis: - develop a clear statement of liability for damages if these result from actions performed by an authorized entity.</u>	P	<b>European Union</b> It is suggested to add a new indent to cover the aspect of liability. This includes reference to the development of a clear statement of liability for damages if these result from actions performed by an authorized entity. <i>Category : SUBSTANTIVE</i>
392	60	develop a process to ensure efficient and effective communication between the NPPO and the authorized <del>entity</del> <u>entity including reporting by the entity to the NPPO.</u>	P	<b>European Union</b> To make clear that it includes reporting by the entity to the NPPO. <i>Category : TECHNICAL</i>

393	60	develop a process to ensure efficient and effective communication between the NPPO and the authorized <del>entity</del> <u>entity including reporting by the entity to the NPPO.</u>  <u>60 bis: develop a clear statement of liability for damages if these result from actions performed by an authorized entity</u>	P	<b>EPPO</b> To make clear that it includes reporting by the entity to the NPPO.  It is suggested to add a new indent to cover the aspect of liability. This includes reference to the development of a clear statement of liability for damages if these result from actions performed by an authorized entity. <i>Category : TECHNICAL</i>
394	60	develop a process to ensure efficient and effective communication between the NPPO and the authorized entity.  <u>- develop a process to publicize and update the list of authorized entities.</u>	P	<b>APPPC</b> (49) Thailand (5 Sep 2018 12:09 PM) Thailand would like to add a new bullet relating to the publication and updating the list of authorization entities as a part of the authorization program.  <i>Category : SUBSTANTIVE</i>
395	60	develop a process to ensure efficient and effective communication between the NPPO and the authorized entity. <u>- define a deadline for the authorisation</u>	P	<b>NEPPO</b>  <i>Category : SUBSTANTIVE</i>
396	60	develop a process to ensure efficient and effective communication between the NPPO and the authorized entity. <u>- develop a process for collecting public opinion about entities on their efficient discharge pf phytosanitary action</u>  <u>- develop a process to ensure efficient and effective resolution of conflicts between the entity and it's client</u> <u>- develop a process to ensure efficient and effective resolution of damages that may occur for non performance of the entity at any court of competent jurisdiction</u>	P	<b>IPPC Regional Workshop Africa</b> Created by merging other changes together <i>Category : SUBSTANTIVE</i>
397	60	develop a process to ensure efficient and effective communication between the NPPO and the authorized entity-  <u>- develop a process for managment and delivery of information and also its confidentiality</u>	P	<b>Costa Rica</b> The NPPO should be responsible for the managment of the confidentiality of the information <i>Category : TECHNICAL</i>
398	60	develop a process to ensure efficient and effective communication between the NPPO and the authorized entity. <u>- develop a process to publicize and update the list of authorized entities.</u>	P	<b>Thailand</b> Thailand would like to add a new bullet relating to the publication and updating the list of authorization entities as a part of the authorization program. <i>Category : SUBSTANTIVE</i>
399	60	develop a process to ensure efficient and effective communication between the NPPO and the authorized entity. <u>- develop a process for collecting public opinion about entities on their efficient discharge of phytosanitary action.</u>	P	<b>Eritrea</b>  <i>Category : SUBSTANTIVE</i>

2. Criteria for Eligibility of Entities				
400	61	<del>23.</del> <b>Criteria for Eligibility of Entities</b>	P	<b>Thailand</b> re-numbering <i>Category : EDITORIAL</i>
401	61	<b>2. Criterios que han de cumplir las entidades</b>	C	<b>OIRSA</b> Se debe de contar con un sistema de aprobación: evaluación legal de documentos y de la resolución de aprobación <i>Category : TECHNICAL</i>
402	62	<del>The</del> <u>If authorizing entities, the</u> NPPO should ensure that the entity meets the following criteria:	P	<b>IPPC Regional Workshop Central Asia &amp; Central Europe</b> To be coherent with comment above (para 44) <i>Category : EDITORIAL</i>
403	62	The NPPO <del>should</del> ensure that the entity meets the following criteria:	P	<b>Montenegro</b>  <i>Category : TECHNICAL</i>
404	63	it has legal status to operate in the country of authorization	C	<b>PPPO</b> further clarification needed <i>Category : SUBSTANTIVE</i>
405	63	l'organisme dispose du statut juridique lui permettant de travailler dans le pays <del>d'autorisation</del> <u>qui lui donne l'autorisation</u> ;	P	<b>Chad</b> correction du paragraphe 63 pour la compréhension <i>Category : EDITORIAL</i>
406	64	it has the ability to enter into <del>a formal</del> <u>an official</u> arrangement with the NPPO	P	<b>European Union</b> Arrangement should be official, not only formal on the paper. <i>Category : SUBSTANTIVE</i>
407	64	it has the ability to enter into a <del>formal</del> <u>official</u> arrangement with the NPPO	P	<b>EPPO</b> Arrangement should be official, not only formal on the paper. <i>Category : SUBSTANTIVE</i>
408	64	it has the <del>ability</del> <u>capability</u> to enter into a formal arrangement with the NPPO	P	<b>PPPO</b> replace ability with capability <i>Category : EDITORIAL</i>
409	64	it has the ability to enter into <del>a formal</del> <u>an</u> arrangement with the NPPO	P	<b>Ukraine</b>  <i>Category : TECHNICAL</i>
410	64	<del>it has the ability to enter into a formal arrangement with the NPPO</del>	P	<b>Argentina</b> Bullet deleted because is covered by first bullet and for consistency with the changes in paragraph 53. <i>Category : TECHNICAL</i>
411	64	<del>it has the ability to enter into a formal arrangement with the NPPO</del>	P	<b>Uruguay</b> Bullet deleted because is covered by THE first bullet and for consistency with changes proposed in paragraph 53. <i>Category : TECHNICAL</i>
412	64	<del>it has the ability to enter into a formal arrangement with the NPPO</del>	P	<b>COSAVE</b> Bullet deleted because is covered by first bullet and for consistency with the changes in paragraph 53. <i>Category : TECHNICAL</i>

413	64	tener <del>capacidad-poder legal</del> para <del>establecer-suscribir</del> un acuerdo formal con la ONPF;	P	<b>OIRSA</b> Mejora la comprensión, la persona que representa la entidad debe tener las calidades legales necesarias para poder firma un acuerdo por lo que se considera que es pertinente aclarar dicha condición <i>Category : TECHNICAL</i>
414	64	tener <del>capacidad-poder legal</del> para <del>establecer-suscribir</del> un acuerdo formal con la ONPF;	P	<b>Costa Rica</b> Quien suscriba un acuerdo debe ser el representante legal de la entidad que se va a autorizar de lo contrario no tendría validez <i>Category : TECHNICAL</i>
415	65	it has sufficient resources (financial and human), including the expertise, equipment and infrastructure required, to undertake the specific phytosanitary actions and to ensure <del>continuity of service</del> <u>continuity of service</u>	P	<b>United States of America</b> See U.S. comment on paragraph 59 <i>Category : TECHNICAL</i>
416	65	it has sufficient resources (financial and human), including the <del>expertise</del> <u>expertise (well qualified staff)</u> , equipment and infrastructure required, to undertake the specific phytosanitary actions and to ensure continuity of service	P	<b>NEPPO</b> <i>Category : SUBSTANTIVE</i>
417	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be <del>suffieient</del> <u>satisfactory</u> , hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))	P	<b>Canada</b> More appropriate term. <i>Category : EDITORIAL</i>
418	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))	C	<b>Panama</b> Spanish version require review to be aligned with the english version <i>Category : TRANSLATION</i>
419	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures ( <del>an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient,</del> hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))	P	<b>Sri Lanka</b> A quality manual should be available as a mandatory requirement <i>Category : SUBSTANTIVE</i>
420	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, <del>this including</del> . <u>This system should include</u> a documented quality manual and standard operating	P	<b>European Union</b> Improvement. <i>Category : EDITORIAL</i>

		<del>procedures (an-procedures. An</del> NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; <del>standard. Standard</del> operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and <del>how))how</del> ).		
421	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, <del>this including. This system should include</del> a documented quality manual and standard operating <del>procedures (an-procedures. An</del> NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; <del>standard. Standard</del> operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and <del>how))how</del> ).	P	<b>EPPO</b> <i>Category : EDITORIAL</i>
422	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))	C	<b>PPPO</b> the understanding that the standard operating procedures should have a mechanism for conflict management <i>Category : TECHNICAL</i>
423	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management <del>systems</del> system (where <del>applicable</del> ), this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))	P	<b>Australia</b> There are programs where an officer is authorised and the NPPO writes the instructional material <i>Category : TECHNICAL</i>
424	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))	C	<b>New Zealand</b> Suggest only having requirements that apply to the quality management system (QMS) rather than mixing requirements of the QMS with requirements of the quality manual, which forms part of the QMS along with the standard operating procedure (SOP). It is confusing to state that other documents can be used in lieu of only the quality manual. Surely the NPPO could also determine that other documents can be used in lieu of entity developed SOPs also. <i>Category : SUBSTANTIVE</i>

425	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, <b>whom</b> , where and how))	P	<b>APPPC</b> (6) Nepal (9 Aug 2018 5:09 PM) <i>Category : EDITORIAL</i>
426	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented <b>quality management system information</b> , this including a <b>documented</b> quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))	P	<b>APPPC</b> (51) Thailand (5 Sep 2018 12:10 PM) The term "documented information" may be more appropriate in this context as it is more perceivable and has already been used in ISO9001:2015. <i>Category : SUBSTANTIVE</i>
427	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating <b>procedures (an procedures. An</b> NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))	P	<b>APPPC</b> (123) New Zealand (7 Sep 2018 7:36 AM) Suggest only having requirements that apply to the quality management system (QMS) rather than mixing requirements of the QMS with requirements of the quality manual, which forms part of the QMS along with the standard operating procedure (SOP). It is confusing to state that other documents can be used in lieu of only the quality manual. Surely the NPPO could also determine that other documents can be used in lieu of entity developed SOPs also. <i>Category : TECHNICAL</i>
428	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management <b>system or an equivalent documented system, this including. The documented quality management system includes</b> a documented quality manual and standard operating procedures ( <del>an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard</del> <b>standard</b> operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))	P	<b>APPPC</b> (133) Japan (7 Sep 2018 6:44 PM) The concept of quality management system is developed based on the ISO9001 but equivalent documented system is enough to authorize entities. <i>Category : SUBSTANTIVE</i>
429	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this <del>including include</del> a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”;	P	<b>Egypt</b> <i>Category : EDITORIAL</i>

		standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))		
430	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is <del>not</del> required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))	P	<b>Mexico</b> It is necessary to describe in detail how it will be carried out, since the NPPO must guarantee that the phytosanitary actions are performed in accordance with the regulations, procedures and protocols in which the authorization will be granted. For that a quality manual is required. <i>Category : TECHNICAL</i>
431	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))	C	<b>Philippines</b> Make the terminology for documentation simpler or define clearly what a quality manual is. This applies to the rest of the document which makes use of "quality manual". <i>Category : SUBSTANTIVE</i>
432	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO <del>its documented quality management system</del> documentation, this including a documented <del>such as</del> quality manual <del>and or</del> standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality <del>manual”; standard operating procedures need manual”) to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and <del>how))how).</del></del>	P	<b>Philippines</b> <i>Category : EDITORIAL</i>
433	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))	C	<b>Costa Rica</b> Spanish version require review to be aligned with the english version <i>Category : TRANSLATION</i>
434	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented <del>quality management system</del> information, this including a <del>documented</del> quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))	P	<b>Thailand</b> The term "documented information" may be more appropriate in this context as it is more perceivable and has already been used in ISO9001:2015. <i>Category : EDITORIAL</i>

435	66	it agrees to conform with the requirements set by the NPPO, <del>including submitting - it submits</del> to the NPPO <del>its documented a</del> quality management <del>system, this including system that includes</del> a documented quality manual and standard operating procedures <del>(an describing how they will consistently meet the requirements established by the NPPO). An</del> NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; <del>standard</del> . <u>Standard</u> operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and <del>how))how</del> ) <u>how</u> )	P	<b>Argentina</b> Paragraph splitted in two bullets to clarify the two criteria of eligibility, conformity with NPPO requirements and having a quality management system. <i>Category : TECHNICAL</i>
436	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))	C	<b>Argentina</b> The end part of paragraph 66 is wrong translated into Spanish. English version provides that standard operating procedures need to describe how specific phytosanitary actions are undertaken, while Spanish version provides that these procedures "NO" need to describe how phytosanitary actions are undertaken. <i>Category : TRANSLATION</i>
437	66	it <del>agrees must</del> to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))	P	<b>Ukraine</b> <i>Category : EDITORIAL</i>
438	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))	C	<b>Uruguay</b> The end part of paragraph 66 is wrong translated into Spanish. English version provides that standard operating procedures need to describe how specific phytosanitary actions are undertaken, while Spanish version provides that these procedures "NO" need to describe how phytosanitary actions are undertaken. <i>Category : TRANSLATION</i>
439	66	it agrees to conform with the requirements set by the NPPO, <del>including submitting - it submits</del> to the NPPO <del>its documented a</del> quality management <del>system, this including system that includes</del> a documented quality manual and standard operating procedures <del>(an (describing how they will consistently meet the requirements established by the NPPO). An</del> NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; <del>standard</del> . <u>Standard</u> operating	P	<b>Uruguay</b> Paragraph splitted in two bullets to clarify the two criteria of eligibility, conformity with NPPO requirements and having a quality management system. <i>Category : TECHNICAL</i>

		procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and <del>how</del> )) <u>how</u> )		
440	66	it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))	C	<b>COSAVE</b> The end part of paragraph 66 is wrong translated into Spanish. English version provides that standard operating procedures need to describe how specific phytosanitary actions are undertaken, while Spanish version provides that these procedures "NO" need to describe how phytosanitary actions are undertaken. <i>Category : TRANSLATION</i>
441	66	it agrees to conform with the requirements set by the NPPO, <del>including submitting</del> <u>- it submits</u> to the NPPO <del>its documented a</del> quality management <u>system, this including system that includes</u> a documented quality manual and standard operating procedures <del>(an describing how they will consistently meet the requirements established by the NPPO. An</del> NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; <del>standard</del> . <u>Standard</u> operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and <del>how</del> )) <u>how</u> )	P	<b>COSAVE</b> Paragraph splitted in two bullets to clarify the two criteria of eligibility, conformity with NPPO requirements and having a quality management system. <i>Category : TECHNICAL</i>
442	66	aceptar ajustarse a los requisitos establecidos por la ONPF, incluida la presentación a la ONPF de su sistema de gestión de la calidad documentado, lo que incluye un manual de calidad y un procedimiento <del>normalizado de actuación documentados</del> <u>operación normalizado</u> (una ONPF podrá determinar que no se requiere un manual de calidad y que podrá ser suficiente otra documentación, denominada en adelante “documentación sustitutiva de un manual de calidad”; no es necesario que el procedimiento <del>normalizado de actuación</del> <u>operación normalizado</u> describa cómo se realizan las acciones fitosanitarias específicas, es decir, quién hace qué, cuándo, dónde y cómo);	P	<b>OIRSA</b> Para ser consistente con el comentario general <i>Category : TECHNICAL</i>
443	66	<del>aceptar ajustarse a los requisitos establecidos por la ONPF, incluida la presentación a la ONPF de su sistema de gestión de la calidad documentado, lo que incluye un manual de calidad y un procedimiento normalizado de actuación documentados (una ONPF podrá determinar que no se requiere un manual de calidad y que podrá ser suficiente otra documentación, denominada en adelante “documentación sustitutiva de un manual de calidad”; no es necesario que el procedimiento normalizado de actuación describa cómo se realizan las acciones fitosanitarias específicas, es decir, quién hace qué, cuándo, dónde y cómo);</del>	P	<b>Colombia</b> Eliminar la siguiente frase “(una ONPF podrá determinar que no se requiere un manual de calidad y que podrá ser suficiente otra documentación, denominada en adelante “documentación sustitutiva de un manual de calidad”; no es necesario que el procedimiento normalizado de actuación describa cómo se realizan las acciones fitosanitarias específicas, es decir, quién hace qué, cuándo, dónde y cómo);”  No es clara la definición del termino “documentación sustitutiva de un manual de calidad”. Se considera que éste genera confusión, debido a que para la supervisión y auditoria es altamente

				relevante contar con documentos detallados sobre la forma en que se ejecuta cada actividad designada. <i>Category : SUBSTANTIVE</i>
444	66	aceptar ajustarse a los requisitos establecidos por la ONPF, incluida la presentación a la ONPF de su sistema de gestión de la calidad documentado, lo que incluye un manual de calidad y un procedimiento <del>normalizado</del> de <del>actuación documentados</del> <u>operación normalizado y documentado</u> (una ONPF podrá determinar que no se requiere un manual de calidad y que podrá ser suficiente otra documentación, denominada en adelante “documentación sustitutiva de un manual de calidad”; no es necesario que el procedimiento <u>de operación</u> normalizado de <del>actuación</del> describa cómo se realizan las acciones fitosanitarias específicas, es decir, quién hace qué, cuándo, dónde y cómo);	P	<b>Costa Rica</b> Consistencia con la versión en inglés <i>Category : TRANSLATION</i>
445	67	it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary <del>actions</del> <u>actions it</u> undertakes.	P	<b>Canada</b> <i>Category : EDITORIAL</i>
446	67	it declares any <del>possible</del> conflict of <del>interest and identifies interest how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions</del> <u>it undertakes</u> .	P	<b>Panama</b> For consistency with ISPM 7. <i>Category : TECHNICAL</i>
447	67	it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary <del>actions</del> <u>actions it</u> undertakes.	P	<b>Sri Lanka</b> <i>Category : EDITORIAL</i>
448	67	it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary <del>actions</del> <u>actions it</u> undertakes.	P	<b>Viet Nam</b> <i>Category : EDITORIAL</i>
449	67	it <del>declares is impartial and free from</del> any <del>possible</del> conflict of interest <del>and identifies how this would be managed to ensure that it acts impartially</del> as regards the specific phytosanitary <del>actions</del> <u>actions it</u> undertakes.	P	<b>European Union</b> This very important requirement is included in the EU Regulation 2017/625 on official controls and other official activities (articles 29 (iii) and 30 (iii)). <i>Category : SUBSTANTIVE</i>
450	67	it <del>declares is impartial and free from</del> any <del>possible</del> conflict of interest <del>and identifies how this would be managed to ensure that it acts impartially</del> as regards the specific phytosanitary <del>actions</del> <u>actions it</u> undertakes.	P	<b>EPPO</b> This very important requirement is included in the EU Regulation 2017/625 on official controls and other official activities (articles 29 (iii) and 30 (iii)). <i>Category : SUBSTANTIVE</i>
451	67	it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary <del>actions</del> <u>actions it</u> undertakes.	P	<b>Japan</b> <i>Category : EDITORIAL</i>
452	67	it declares any possible <del>conflict of interest</del> <u>conflict of interest</u> and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary <del>actions</del> <u>actions it</u> undertakes.	P	<b>United States of America</b> perhaps include a statement that the agreement should identify specifically what could be a conflict of interest. <i>Category : TECHNICAL</i>

453	67	it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially <u>and with integrity</u> as regards the specific phytosanitary <del>actions</del> <u>actions it</u> undertakes.	P	<b>New Zealand</b> It's possible to be influenced by conflict of interest – and still be impartial - i.e. everyone has ability to influence a decision <i>Category : TECHNICAL</i>
454	67	it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary <del>actions</del> <u>it undertakes</u> <u>actions it undertakes particularly for supervision and auditing</u> .	P	<b>APPPC</b> (52) Thailand (5 Sep 2018 12:12 PM) We would like to specifically identify the phytosanitary actions including supervision and auditing that must be undertaken against conflict of interest. <i>Category : SUBSTANTIVE</i>
455	67	it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary <del>actions</del> <u>actions it</u> undertakes.	P	<b>Egypt</b> <i>Category : EDITORIAL</i>
456	67	it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary <del>actions</del> <u>actions it</u> undertakes.	P	<b>IPPC Regional Workshop Africa</b> <i>Category : EDITORIAL</i>
457	67	it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary <del>actions</del> <u>actions it</u> undertakes.	P	<b>Australia</b> <i>Category : EDITORIAL</i>
458	67	it declares any <del>possible</del> conflict of interest <del>and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions</del> <u>it undertakes</u> .	P	<b>Costa Rica</b> For consistency with ISPM 7 <i>Category : TECHNICAL</i>
459	67	it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary <del>actions</del> <u>actions it</u> undertakes <u>, particularly for supervision and auditing</u> .	P	<b>Thailand</b> We would like to specifically identify the phytosanitary actions including supervision and auditing that must be undertaken against conflict of interest. <i>Category : SUBSTANTIVE</i>
460	67	it declares any <del>possible</del> conflict of interest <del>and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions</del> <u>it undertakes</u> .	P	<b>Mexico</b> To be consistent with ISPM 7 <i>Category : SUBSTANTIVE</i>
461	67	it declares any <del>possible</del> conflict of interest <del>and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions</del> <u>it undertakes</u> .	P	<b>Argentina</b> For consistency with ISPM 7. <i>Category : TECHNICAL</i>
462	67	it declares any <del>possible</del> conflict of <del>interest and identifies</del> <u>interest</u> <del>how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions</del> <u>it undertakes</u> .	P	<b>Uruguay</b> For consistency with ISPM 7 <i>Category : TECHNICAL</i>
463	67	it declares any <del>possible</del> conflict of <del>interest and identifies</del> <u>interest</u> <del>how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions</del> <u>it undertakes</u> .	P	<b>COSAVE</b> For consistency with ISPM 7. <i>Category : TECHNICAL</i>

464	67	declarar <del>todos los posibles que no tiene</del> conflictos de intereses <del>y especificar cómo se gestionarían tales conflictos</del> para garantizar que actúa con imparcialidad en lo que respecta a las acciones fitosanitarias específicas que emprende.	P	<b>OIRSA</b> Las entidades que ejecutan las acciones fitosanitarias deben asegurar la imparcialidad en todo momento. Si existiera la posibilidad de tener algún conflicto, la imparcialidad podría verse afectada. <i>Category : TECHNICAL</i>
<b>3. Roles and Responsibilities for Implementing the Authorization Programme</b>				
465	68	<b>3. Roles and Responsibilities <del>for Implementing the for</del> <u>Implementing the</u> Authorization Programme</b>	P	<b>Sri Lanka</b> <i>Category : EDITORIAL</i>
466	68	<b>3. Roles and Responsibilities <del>for Implementing the Authorization Programme for</del> <u>Implementing the Authorization</u></b>	P	<b>European Union</b> The term "authorization programme" is not clear. <i>Category : TECHNICAL</i>
467	68	<b>3. Roles and Responsibilities for Implementing the <del>Authorization Programme</del> <u>Authorization</u></b>	P	<b>EPPO</b> The term "authorization programme" is not clear. <i>Category : TECHNICAL</i>
468	68	<b>3. Roles and Responsibilities <del>for Implementing the for</del> <u>Implementing the</u> Authorization Programme</b>	P	<b>Ghana</b> <i>Category : EDITORIAL</i>
469	68	<b>3. Roles and Responsibilities <del>for Implementing the for</del> <u>Implementing the</u> Authorization Programme</b>	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> <i>Category : EDITORIAL</i>
470	68	<b>3. Roles and Responsibilities <del>for Implementing the for</del> <u>Implementing the</u> Authorization Programme</b>	P	<b>Japan</b> <i>Category : EDITORIAL</i>
471	68	<b><u>34.1</u> Roles and Responsibilities for Implementing the Authorization Programme</b>	P	<b>APPPC</b> (53) Thailand (5 Sep 2018 12:13 PM) re-numbering <i>Category : EDITORIAL</i>
472	68	<b>3. Roles and Responsibilities <del>for Implementing the for</del> <u>Implementing the</u> Authorization Programme</b>	P	<b>APPPC</b> (105) New Zealand (7 Sep 2018 6:43 AM) (164) Philippines (12 Sep 2018 3:28 AM) <i>Category : EDITORIAL</i>
473	68	<b>3. Roles and Responsibilities <del>for Implementing the for</del> <u>Implementing the</u> Authorization Programme</b>	P	<b>IPPC Regional Workshop Africa</b> <i>Category : EDITORIAL</i>
474	68	<b>3. Roles and Responsibilities <del>for Implementing the for</del> <u>Implementing the</u> Authorization Programme</b>	P	<b>Philippines</b> <i>Category : EDITORIAL</i>
475	68	<b>3. Roles and Responsibilities <del>for Implementing the for</del> <u>Implementing the</u> Authorization Programme</b>	P	<b>NEPPO</b> <i>Category : SUBSTANTIVE</i>
476	68	<b><u>34.</u> Roles and Responsibilities for Implementing the Authorization Programme</b>	P	<b>Thailand</b> re-numbering <i>Category : EDITORIAL</i>
<b>3.1 Roles and responsibilities of the NPPO</b>				

477	69	<b>34.1 Roles and responsibilities of the NPPO</b>	P	<b>Thailand</b> re-numbering <i>Category : EDITORIAL</i>
478	69	<b>3.1 Roles and responsibilities of the NPPO</b>	C	<b>Ukraine</b> General comments to part 3.1: We think the standard should define in a clearer way the conditions and timeframe when an NPPO may suspend, revoke, reinstate or issue authorizations. We would like to suggest unbiased audits.  <i>Category : SUBSTANTIVE</i>
479	69	<b>3.1 Funciones y responsabilidades de la ONPF</b>	C	<b>OIRSA</b> Sistema de aprobación: evaluación legal de documentos. De las actividades, de los requisitos y procedimientos de autorización. De la supervisión. De la unidad de fiscalización: fiscalización regular. De la suspensión o revocación de la autorización. De los informes y manejo de información.  <i>Category : TECHNICAL</i>
480	70	The roles and responsibilities of the NPPO should include the following: <u>70 bis: - to evaluate which actions can be authorized at governmental level, which for nongovernmental level and which for individual persons by taking into account specific section in this standard and legislation and situation in country</u>	P	<b>European Union</b> To make clear that the first step for the NPPO is deciding whether to authorize entities to carry out actions and if so, which ones. <i>Category : SUBSTANTIVE</i>
481	70	The roles and responsibilities of the NPPO should include the following:	C	<b>European Union</b> Proposal to seek legal advice on this question (see general comment). <i>Category : SUBSTANTIVE</i>
482	70	The roles and responsibilities of the NPPO should include the following: <u>70 bis: to evaluate which actions can be authorized at governmental level, which for nongovernmental level and which for individual persons by taking into account specific section in this standard and legislation and situation in country</u>	P	<b>EPPO</b> To make clear that the first step for the NPPO is deciding whether to authorize entities to carry out actions and if so, which ones. <i>Category : SUBSTANTIVE</i>
483	70	The roles and responsibilities of the NPPO should include the following:	C	<b>EPPO</b> As mentioned in one of the general comments, it is proposed to seek legal advice on this question. <i>Category : SUBSTANTIVE</i>
484	70	The roles and responsibilities of the NPPO should include the following: <u>-To ensure the legal framework exists to enable the authorization programme</u>	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> For consistency with the the section in the draft on requirements <i>Category : SUBSTANTIVE</i>
485	70	The roles and responsibilities of the NPPO should include the following:	C	<b>Jamaica</b> Roles and responsibilities of the NPPO Add to establish the legal framework to support the authorization programme to the Roles and responsibility of the NPPO.

				<i>Category : SUBSTANTIVE</i>
486	70	The roles and responsibilities of the NPPO should include the following: <u>- to ensure the legal framework exists to support the authorization program</u>	P	<b>Antigua and Barbuda</b> The requirement for the NPPO to have legal support of its actions was mentioned earlier in the document but should also be included under this section that speaks to the specific roles and responsibilities of the NPPO. <i>Category : SUBSTANTIVE</i>
487	70	The roles and responsibilities of the NPPO <del>should</del> include the following:	P	<b>Montenegro</b> <i>Category : TECHNICAL</i>
488	70	The roles and responsibilities of the NPPO should include the following:	C	<b>Ukraine</b> The standard should set which of phytosanitary actions may be performed by an entity. <i>Category : SUBSTANTIVE</i>
489	71	to assess the entity against the criteria for eligibility <u>set in this standard and those</u> established by the NPPO	P	<b>European Union</b> More precise wording. <i>Category : SUBSTANTIVE</i>
490	71	to assess the entity against the criteria for eligibility <u>set in this standard and those</u> established by the NPPO	P	<b>EPPO</b> More precise wording <i>Category : TECHNICAL</i>
491	71	to assess the entity <del>against according</del> the criteria for eligibility established by the NPPO	P	<b>Montenegro</b> <i>Category : TECHNICAL</i>
492	71	to assess the entity against the criteria for eligibility established by the NPPO, <u>including any conflict of interest</u>	P	<b>Mexico</b> To highlight that the NPPO needs to consider everything including aspects of conflict of interest <i>Category : TECHNICAL</i>
493	71	to assess the entity against the criteria for eligibility established by the NPPO	C	<b>Ukraine</b> The standard should set the criteria for eligibility taking into account specific features of delegated functions <i>Category : SUBSTANTIVE</i>
494	71	<del>evaluar-auditar</del> si la entidad cumple los criterios establecidos por la <del>ONPF</del> ONPF <u>para su autorización;</u>	P	<b>OIRSA</b> <i>Category : TECHNICAL</i>
495	71	evaluar si la entidad cumple los criterios establecidos por la <del>ONPF</del> ONPF <u>para su autorización;</u>	P	<b>Costa Rica</b> Aclarar para que se va a evaluar la empresa <i>Category : TECHNICAL</i>
496	72	to define clearly the phytosanitary actions the entity is authorized to perform, the performance criteria and corrective actions; <u>performance criteria should be defined taking into account the nature of the authorized entity and the action delegated</u>	P	<b>European Union</b> In this standard, performance criteria must be defined, taking into account the specific nature of the delegated authorities. <i>Category : SUBSTANTIVE</i>
497	72	to <del>define</del> clearly <u>define</u> the phytosanitary actions the entity is authorized to perform, the performance criteria and corrective actions	P	<b>European Union</b> Better English. <i>Category : EDITORIAL</i>
498	72	to <del>define</del> clearly <u>define</u> the phytosanitary actions the entity is authorized to perform, the performance criteria and corrective actions; <u>performance criteria</u>	P	<b>EPPO</b> Better English

		<u>should be defined taking into account the nature of the authorized entity and the action delegated</u>		In this standard, performance criteria must be defined, taking into account the specific nature of the delegated authorities. <i>Category : SUBSTANTIVE</i>
499	72	to define clearly the <del>phytosanitary</del> <u>Phytosanitary</u> actions the entity is authorized to perform, the performance criteria and corrective actions	P	<b>Ghana</b> <i>Category : EDITORIAL</i>
500	72	to define clearly the <del>phytosanitary</del> <u>Phytosanitary</u> actions the entity is authorized to perform, the performance criteria and corrective actions	P	<b>Ghana</b> <i>Category : EDITORIAL</i>
501	72	to define clearly the phytosanitary actions the entity is authorized to perform, the performance criteria and corrective actions	C	<b>New Zealand</b> Suggest corrective actions should be addressed separately as they would not typically be pre-defined, whereas the performance criteria and phytosanitary actions would be. Corrective actions should be "determined" by the NPPO, rather than "defined". <i>Category : SUBSTANTIVE</i>
502	72	to define clearly the phytosanitary actions the entity is authorized to perform, the performance criteria and corrective actions	C	<b>APPPC</b> (124) New Zealand (7 Sep 2018 7:40 AM) Suggest corrective actions should be addressed separately as they would not typically be pre-defined, whereas the performance criteria and phytosanitary actions would be. Corrective actions should be "determined" by the NPPO, rather than "defined". <i>Category : SUBSTANTIVE</i>
503	72	to define clearly the phytosanitary actions the entity is authorized to perform, the performance criteria and corrective actions	C	<b>Ukraine</b> The standard should set the performance criteria taking into account specific features of delegated functions <i>Category : SUBSTANTIVE</i>
504	72	<u>Définir</u> clairement <del>définir</del> les actions phytosanitaires que l'organisme est autorisé à mener ainsi que les critères d'évaluation et les actions correctives y afférents;	P	<b>Chad</b> correction du paragraphe 72 <i>Category : EDITORIAL</i>
505	73	to evaluate the entity against the requirements set by the NPPO regarding its documented quality <del>manual (or documentation sufficient to address the specific phytosanitary actions) and management system and its</del> implementation of standard operating procedures on-site, and propose suggestions for improvement as necessary	P	<b>European Union</b> The whole quality management system, i.e. not only the quality manual (or the documentation in lieu of a quality manual) but also the standard operating procedures should be documented according to paragraphs 66 and 85. <i>Category : TECHNICAL</i>
506	73	to evaluate the entity against the requirements set by the NPPO regarding its documented quality <del>manual (or documentation sufficient to address the specific phytosanitary actions) and management system and its</del> implementation of standard operating procedures on-site, and propose suggestions for improvement as necessary	P	<b>EPPO</b> The whole quality management system, i.e. not only the quality manual (or the documentation in lieu of a quality manual) but also the standard operating procedures should be documented according to paragraphs 66 and 85. <i>Category : TECHNICAL</i>
507	73	to evaluate the entity against the requirements set by the NPPO regarding its documented quality manual (or documentation sufficient to address the specific phytosanitary <del>actions) and actions) and</del> implementation of <del>standard operating</del>	P	<b>Ghana</b> <i>Category : EDITORIAL</i>

		<del>procedures</del> <u>Standard Operating Procedures (SOP)</u> on-site, and propose suggestions for improvement as necessary		
508	73	to evaluate the entity against the requirements set by the NPPO regarding its documented quality manual (or documentation sufficient to address the specific phytosanitary <del>actions)and-actions)</del> <u>and</u> implementation of standard operating procedures on-site, and propose suggestions for improvement as necessary	P	<b>Japan</b> <i>Category : EDITORIAL</i>
509	73	to evaluate the entity against the requirements set by the NPPO regarding its documented quality manual (or documentation <del>sufficient to address the specific phytosanitary actions)and-in lieu of a quality manual)</del> <u>and</u> implementation of standard operating procedures on-site, and propose suggestions for improvement as necessary	P	<b>APPPC</b> (125) New Zealand (7 Sep 2018 7:43 AM) Suggested change relates to statement in section 2. NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as "documentation in lieu of a quality manual". <i>Category : TECHNICAL</i>
510	73	to evaluate the entity against the requirements set by the NPPO regarding its documented quality manual (or documentation <del>sufficient to address the specific phytosanitary actions)and-in lieu of a quality manual)</del> <u>and</u> implementation of standard operating procedures on-site, and propose suggestions for improvement as necessary	P	<b>New Zealand</b> Suggested change relates to statement in section 2. NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as "documentation in lieu of a quality manual". <i>Category : TECHNICAL</i>
511	73	to evaluate the entity against the requirements set by the NPPO regarding its documented quality manual (or documentation sufficient to address the specific phytosanitary actions)and implementation of standard operating procedures on-site, and propose suggestions for improvement as necessary	C	<b>Philippines</b> NPPOs may have different forms of documentation. It may be wise to keep it as "documentation" or define what a "quality manual or standard operating procedures manual" is. <i>Category : EDITORIAL</i>
512	73	to evaluate the entity against the requirements set by the NPPO regarding <del>its documented quality manual (or documentation sufficient to address the on</del> specific phytosanitary <del>actions)and-actions)</del> <u>and</u> implementation of standard operating procedures on-site, and propose suggestions for improvement as necessary	P	<b>Philippines</b> <i>Category : EDITORIAL</i>
513	73	to evaluate the entity against the requirements set by the NPPO regarding its documented quality manual (or documentation sufficient to address the specific phytosanitary <del>actions)and-actions)</del> <u>and</u> implementation of standard operating procedures on-site, and propose suggestions for improvement as necessary	P	<b>NEPPO</b> <i>Category : EDITORIAL</i>
514	73	to evaluate the entity <del>against-accordance with</del> the requirements set by the NPPO regarding its documented quality manual (or documentation sufficient to address the specific phytosanitary actions)and implementation of standard operating procedures on-site, and propose suggestions for improvement as necessary	P	<b>Montenegro</b> <i>Category : TECHNICAL</i>
515	73	evaluar si la entidad cumple los <del>requisitos-criterios</del> establecidos por la ONPF en relación con su manual de calidad documentado (o documentación suficiente para abordar las acciones fitosanitarias específicas) y la aplicación in situ del	P	<b>OIRSA</b> Se agregó el término requisitos para establecer condición específica y no solo subjetiva. <i>Category : SUBSTANTIVE</i>

		procedimiento normalizado de actuación, y proponer sugerencias de mejora en caso necesario;		
516	73	evaluar si la entidad cumple los requisitos establecidos por la ONPF en relación con su manual de calidad documentado (o documentación suficiente para abordar las acciones fitosanitarias específicas) y la aplicación <del>in situ</del> <i>in situ</i> del procedimiento normalizado de actuación, y proponer sugerencias de mejora en caso necesario;	P	<b>Colombia</b> Toda palabra en latín debe ir en cursiva Category : EDITORIAL
517	74	to enter into an arrangement which authorizes the entity to perform specific phytosanitary actions, and review and update the arrangement as necessary  <a href="#">- Notify entities that did not meet the criteria for eligibility and provide the rationale for the decision</a>	P	<b>Canada</b> It is equally important to notify entities that did not qualify to participate in the program and to provide them the rationale for the decision. Category : SUBSTANTIVE
518	74	to enter into an arrangement which authorizes the entity to perform specific <del>phytosanitary</del> <i>Phytosanitary</i> actions, and review and update the arrangement as necessary	P	<b>Ghana</b>  Category : EDITORIAL
519	74	to enter into an arrangement which authorizes the entity to perform specific phytosanitary actions, and review and update the arrangement as <del>necessary</del> <i>necessary with a specified time frame</i>	P	<b>IPPC Regional Workshop Africa</b>  Category : SUBSTANTIVE
520	74	to enter into an arrangement which authorizes the entity to perform specific phytosanitary actions, and review and update the arrangement as necessary	C	<b>South Africa</b> Insertion of the word "formal" before the word "arrangements" reason being that arrangements must be formalised. Category : SUBSTANTIVE
521	74	to enter into an arrangement which authorizes the entity to perform specific phytosanitary actions, and review and update the arrangement as <del>necessary</del> <i>necessary with a specified time frame</i>	P	<b>Eritrea</b>  Category : TECHNICAL
522	75	to train NPPO personnel and ensure that their skills and competencies are maintained at an adequate level to consistently implement the authorization <del>programme</del> <i>process</i>	P	<b>European Union</b> The term "authorization programme" is not clear. The term "process" is suggested. Category : TECHNICAL
523	75	to train NPPO personnel and ensure that their skills and competencies are maintained at an adequate level to consistently implement the authorization <del>programme</del> <i>process</i>	P	<b>EPPO</b> The term "authorization programme" is not clear. The term "process" is suggested. Category : TECHNICAL
524	75	to train NPPO <del>and authorized entities</del> <i>and authorized entities</i> personnel and ensure that their skills and competencies are maintained at an adequate level to consistently implement the authorization programme	P	<b>APPPC</b> (166) Philippines (12 Sep 2018 3:29 AM) Category : SUBSTANTIVE

525	75	to train NPPO personnel and ensure that their skills and competencies are maintained at an adequate level to consistently implement the authorization programme	C	<b>Ukraine</b> - a clear provision who is to train NPPO personnel is necessary here. <i>Category : SUBSTANTIVE</i>
526	76	to carry out regular audits <b>or supervisions</b> of the authorized entity to verify that it conforms with the requirements of the NPPO's authorization programme	P	<b>Panama</b> Two sections are considered. The audit is focus in a integral review of all procedures and the supervisions as frequently visits to ensure that the authorized actions are being undertaken. <i>Category : TECHNICAL</i>
527	76	to carry out regular audits of the authorized entity to verify that it conforms with the requirements of the NPPO's <b>authorization programmeauthorization</b>	P	<b>European Union</b> The term "authorization programme" is not clear. <i>Category : TECHNICAL</i>
528	76	to carry out regular audits of the authorized entity to verify that it conforms with the requirements of the NPPO's <b>authorization programmeauthorization</b>	P	<b>EPPO</b> The term "authorization programme" is not clear. <i>Category : TECHNICAL</i>
529	76	to carry out regular audits of the authorized entity to verify that it conforms with the requirements of the NPPO's authorization programme	C	<b>PPPO</b> more clarity on the word regular <i>Category : SUBSTANTIVE</i>
530	76	to carry out regular audits of the authorized <b>entity-entity, also via third-party contractors.</b> to verify that it conforms with the requirements of the NPPO's authorization programme	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> For consistency with the following section of the draft standard referring to roles and responsibilities of authorized entities. <i>Category : SUBSTANTIVE</i>
531	76	to carry out regular audits of the authorized entity to verify that it conforms with the requirements of the NPPO's authorization programme	C	<b>United States of America</b> See the U.S> comment in para 55. <i>Category : TECHNICAL</i>
532	76	to carry out regular audits of the authorized entity to verify that it conforms with the requirements of the NPPO's authorization programme	C	<b>Jamaica</b> Reword sentence to capture activities of third parties. to carry out regular audits of the authorized entity, also via third party contractor, to verify that it conforms with the requirements of the NPPO's authorization programme <i>Category : SUBSTANTIVE</i>
533	76	to carry out regular audits <b>or supervisions</b> of the authorized entity to verify that it conforms with the requirements of the NPPO's authorization programme	P	<b>Costa Rica</b> Two sections are considered. The audit is focus in a integral review of all procedures and the supervisions as frequently visits to ensure that the authorized actions are being undertaken. <i>Category : TECHNICAL</i>
534	76	llevar a cabo auditorías <b>o supervisiones técnicas</b> periódicas de la entidad autorizada para verificar que cumple los requisitos del programa de autorizaciones de la ONPF;	P	<b>OIRSA</b> Se consideran dos acciones diferentes, la auditoria está más enfocada en una revisión integral de todos los procedimientos y las supervisiones como visitas más frecuentes para asegurar que se están realizando las acciones autorizadas. <i>Category : TECHNICAL</i>

535	76	llevar a cabo auditorías <u>o supervisiones</u> periódicas de la entidad autorizada para verificar que cumple los requisitos del programa de autorizaciones de la ONPF;	P	<b>Costa Rica</b> Se consideran dos acciones diferentes, la auditoria está más enfocada en una revisión integral de todos los procedimientos y las supervisiones como visitas más frecuentes para asegurar que se están realizando las acciones autorizadas. <i>Category : TECHNICAL</i>
536	77	to carry out internal audits of its own procedures and processes to verify that the objectives of <del>its authorization programme</del> <u>the authorizations</u> continue to be met	P	<b>European Union</b> The term "authorization programme" is not clear. <i>Category : TECHNICAL</i>
537	77	to carry out internal audits of its own procedures and processes to verify that the objectives of <del>its authorization programme</del> <u>the authorizations</u> continue to be met	P	<b>EPPO</b> The term "authorization programme" is not clear. <i>Category : TECHNICAL</i>
538	77	to carry out <del>internal audits</del> <u>internal audits</u> of its own procedures and processes to verify that the objectives of its authorization programme continue to be met	P	<b>United States of America</b> Depends on practicality of the process and ability of the NPPO. <i>Category : TECHNICAL</i>
539	77	to carry out internal audits of its own procedures and processes to verify that the objectives of its authorization programme continue to be met	C	<b>Ukraine</b> The standard should define the frequency of audits of entities. <i>Category : SUBSTANTIVE</i>
540	78	to implement processes for addressing identified nonconformities, including, where appropriate, suspending or revoking authorization, which may include regulatory enforcement. <u>- to implement the processes for the entity to voluntarily withdraw from the authorization programme.</u>	P	<b>Viet Nam</b> Add more a bullet to be in accordance with bullet no.10 under section 1 authorization programme concerning voluntarily withdrawal of authorized entities <i>Category : SUBSTANTIVE</i>
541	78	to implement processes for addressing identified nonconformities, including, where appropriate, suspending or revoking authorization, which may include regulatory enforcement <u>- to implement the processes for the entity to voluntarily withdraw from the authorization programme</u>	P	<b>Korea, Republic of</b> to add this bullet to be in accordance with bullet no.10 under section 1 authorization programme concerning voluntarily withdrawal of authorized entities. <i>Category : SUBSTANTIVE</i>
542	78	to implement processes for addressing identified <del>noneonformities</del> <u>non-conformities</u> , including, where appropriate, suspending or revoking authorization, which may include regulatory enforcement	P	<b>Japan</b> <i>Category : EDITORIAL</i>
543	78	to implement processes for addressing identified nonconformities, including, where appropriate, suspending or revoking authorization, which may include regulatory enforcement <u>- to implement the processes for the entity to voluntarily withdraw from the authorization programme</u>	P	<b>APPPC</b> (157) APPPC (11 Sep 2018 8:58 AM) to add this bullet to be in accordance with bullet no.10 under section 1 authorization programme concerning voluntarily withdrawal of authorized entities. (55) Thailand (5 Sep 2018 12:15 PM) Thailand would like to add this bullet to be in accordance with bullet no.10 under section 1 authorization programm concerning voluntarily withdrawal of authorized entities. <i>Category : SUBSTANTIVE</i>

544	78	to implement processes for addressing identified nonconformities, including, where appropriate, suspending or revoking authorization, which may include regulatory enforcement <u>- to implement the processes for the entity to voluntarily withdraw from the authorization programme</u>	P	<b>Thailand</b> Thailand would like to add this bullet to be in accordance with bullet no.10 under section 1 authorization programme concerning voluntarily withdrawal of authorized entities. <i>Category : SUBSTANTIVE</i>
545	78	mettre en œuvre des processus pour gérer les cas de non-conformité observés qui prévoient notamment sur les activités prévues, s'il y a lieu, la suspension ou le retrait d'une autorisation, et peuvent reposer sur l'exécution de en tenant compte des dispositions réglementaires réglementaires;	P	<b>Chad</b> Reformulation du paragraphe 78 pour une bonne compréhension <i>Category : EDITORIAL</i>
546	79	to maintain documentation, including records and lists of authorized <del>entities</del> <u>entities and update records and its corresponding authorized phytosanitary actions, period and registration code.</u>	P	<b>Viet Nam</b> To increase transparency <i>Category : SUBSTANTIVE</i>
547	79	to maintain documentation, including records and lists of authorized entities	C	<b>PPPO</b> include a sub point ...to communicate this information to trading partners <i>Category : SUBSTANTIVE</i>
548	79	to maintain documentation, including records and lists of authorized entities <u>-to publish lists of authorized entities and its corresponding authorized phytosanitary actions, period and registration number.</u>	P	<b>APPPC</b> (35) China (3 Sep 2018 10:16 AM) To increase transparency. <i>Category : SUBSTANTIVE</i>
549	79	to maintain documentation, including records and lists of authorized entities <u>- to make available (e.g. to publish) the lists of authorized entities and updating them</u>	P	<b>Iran</b> <i>Category : TECHNICAL</i>
550	79	to maintain documentation, including records and lists of authorized entities <u>- to publicize the updated list of authorized entities</u>	P	<b>Thailand</b> to be in line with the new bullet just added in section 1. <i>Category : SUBSTANTIVE</i>
551	80	to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities. <u>- To establish a complaint system as a feedback mechanism</u>	P	<b>Panama</b> Establish a complain system for service users as a mechanism of feedback to prevent irregularities of the service <i>Category : TECHNICAL</i>
552	80	to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities. <u>- to implement national phytosanitary regulation.</u> <u>- to ensure that the documented information of authorized entities is adequately protected from loss of confidentiality or improper use.</u>	P	<b>Viet Nam</b> to add bullets concerning confidentiality of the authorized entities as priority and to be in line with international standards (ISO) for the certification body <i>Category : SUBSTANTIVE</i>

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553	80	to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities. <u>- to ensure that the documented information of authorized entities is adequately protected from loss of confidentiality or improper use.</u>	P	<b>Korea, Republic of</b> To add a new bullet concerning confidentiality of the authorized entities as priority and to be in line with international standards (ISO) for the certification body. <i>Category : SUBSTANTIVE</i>
554	80	to implement and maintain transparent, efficient and effective communication on the authorization <del>programme</del> process, in particular between the NPPO and the authorized entities.	P	<b>European Union</b> The term "authorization programme" is not clear. The term "process" is suggested. <i>Category : TECHNICAL</i>
555	80	to implement and maintain transparent, efficient and effective communication on the authorization <del>programme</del> process, in particular between the NPPO and the authorized entities.	P	<b>EPPO</b> The term "authorization programme" is not clear. The term "process" is suggested. <i>Category : TECHNICAL</i>
556	80	to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities.	C	<b>IPPC Regional Workshop Central Asia &amp; Central Europe</b> It was suggested to add the following indent: - To publish officially the list of authorized entities In Russian: - Официальная публикация перечня уполномоченных юридических лиц <i>Category : SUBSTANTIVE</i>
557	80	to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities.  <u>to publish lists of authorized entities and its corresponding authorized phytosanitary actions, period and registration number.</u>	P	<b>China</b> To increase trades transparency. <i>Category : SUBSTANTIVE</i>
558	80	to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities.  <u>- To implement national phytosanitary regulation.</u>	P	<b>APPPC</b> (7) Nepal (9 Aug 2018 5:13 PM) <i>Category : SUBSTANTIVE</i>
559	80	to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities.  <u>- to ensure that the documented information of authorized entities is adequately protected from loss of confidentiality or improper use.</u>	P	<b>APPPC</b> (57) Thailand (5 Sep 2018 12:17 PM) Thailand would like to add a new bullet concerning confidentiality of the authorized entities as priority and to be in line with international standards (ISO) for the certification body. <i>Category : SUBSTANTIVE</i>
560	80	to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities.	P	<b>NEPPO</b> For transparency <i>Category : SUBSTANTIVE</i>

		<u>-publish authorized entities list .</u>		
561	80	to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities. <u>- to establish a complaint system as a feedback mechanism</u>	P	<b>Costa Rica</b> Establish a complain system for service users as a mechanism of feedback to prevent irregularities of the service <i>Category : TECHNICAL</i>
562	80	to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities <u>- published list of authorized entities on NPPO web page.</u>	P	<b>Montenegro</b> <i>Category : TECHNICAL</i>
563	80	to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities. <u>- to ensure that the documented information of authorized entities is adequately protected from loss of confidentiality or improper use.</u>	P	<b>Thailand</b> Thailand would like to add a new bullet concerning confidentiality of the authorized entities as priority and to be in line with international standards (ISO) for the certification body. <i>Category : SUBSTANTIVE</i>
564	80	to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities.	C	<b>Mexico</b> Is necessary to include these responsibilities. <i>Category : TECHNICAL</i>
565	80	to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities.	C	<b>Mexico</b> To maintain transparency of the process <i>Category : TECHNICAL</i>
566	80	to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities.  <u>- Validate the registration formats of the phytosanitary actions in which the entity is authorized, to guarantee that they are carried out with transparency and consistency;</u> <u>- determine the authorization matters, determining the type and quantity of entities required by the NPPO, as well as the phytosanitary actions that these will carry out.</u> <u>- establish the period of authorization of the entity; in addition to establishing the criteria for the suspension or revocation of the authorized entity in case of non-compliance with its functions and responsibilities.</u> <u>- integrate and publish the data of the authorized entities, indicating the specific phytosanitary actions that perform on behalf of the NPPO.</u>	P	<b>Mexico</b> <i>Category : TECHNICAL</i>

567	80	<del>mettre en œuvre et</del> maintenir une communication transparente, efficace et efficiente sur le programme d'autorisation, en particulier entre l'ONPV et les organismes autorisés.	P	<b>Chad</b> correction du paragraphe 80 <i>Category : EDITORIAL</i>
568	80	establecer y mantener una comunicación transparente, eficiente y eficaz sobre el programa de autorizaciones, en particular entre la ONPF y las entidades autorizadas.  <u>(81) Implement a complaint system for service users as a feedback mechanism to prevent irregularities in the system.</u>	P	<b>OIRSA</b> Se propone la adición de un párrafo ya que es un elemento importante de retroalimentación sobre la efectividad y calidad del servicio. <i>Category : SUBSTANTIVE</i>
569	80	establecer y mantener una comunicación transparente, eficiente y eficaz sobre el programa de autorizaciones, en particular entre la ONPF y las entidades autorizadas.  <u>autorizar a la entidad que audita a otras entidades autorizadas o supervisa las acciones fitosanitarias</u>	P	<b>OIRSA</b> Incluye, la ONPF también debería tener control sobre las entidades que auditen a la entidad autorizada para evitar conflictos de interés. Ya que si esta son contratadas y pagadas por las entidades autorizadas podría perder objetividad, además esta entidad no tendría ninguna responsabilidad con la ONPF <i>Category : SUBSTANTIVE</i>
<b>3.2 Roles and responsibilities of the authorized entity</b>				
570	81	<b>3.2 Roles and responsibilities of the authorized entity</b>	C	<b>European Union</b> We propose to add in this section: - comply with the requirements established in the phytosanitary procedures, standards, legislation and guidelines of the NPPO.  <i>Category : SUBSTANTIVE</i>
571	81	<b>3.2 Roles and responsibilities of the <del>authorized</del> entity</b>	P	<b>European Union</b> There are some tasks and responsibilities to entity to become authorized before it is authorized. <i>Category : TECHNICAL</i>
572	81	<b>3.2 Roles and responsibilities of the authorized entity</b>	C	<b>EPPO</b> We propose to add in this section: - comply with the requirements established in the phytosanitary procedures, standards, legislation and guidelines of the NPPO.  <i>Category : SUBSTANTIVE</i>
573	81	<b>3.2 Roles and responsibilities of the <del>authorized</del> entity</b>	P	<b>EPPO</b> In the list there are some tasks and responsibilities for the entity before authorization. <i>Category : TECHNICAL</i>
574	81	<b><del>3.2</del> Roles and responsibilities of the authorized entity</b>	P	<b>APPPC</b> (58) Thailand (5 Sep 2018 12:18 PM) re-numbering  <i>Category : EDITORIAL</i>
575	81	<b><del>3.2</del> Roles and responsibilities of the authorized entity</b>	P	<b>Thailand</b>

				<i>Category : EDITORIAL</i>
576	81	<b>3.2 Roles and responsibilities of the authorized entity</b>	C	<b>Ukraine</b> (Proposed modification to the title: Roles and responsibilities of an entity) General comments to part 3.2: In this case, the requirement of this section are to be met by entities seeking to be authorized by NPPO (candidates)  <i>Category : TECHNICAL</i>
577	81	<b>3.2 Funciones y responsabilidades de la entidad autorizada</b>	C	<b>OIRSA</b> Procedimiento para la autorización. De la resolución. La evaluación técnica y legal de los documentos.  <i>Category : TECHNICAL</i>
578	82	The roles and responsibilities of the <del>authorized</del> entity should include the following:	P	<b>European Union</b> In the list there are some tasks and responsibilities for the entity before authorization. <i>Category : SUBSTANTIVE</i>
579	82	The roles and responsibilities of the <del>authorized</del> entity should include the following:	P	<b>EPPO</b> In the list there are some tasks and responsibilities for the entity before authorization. <i>Category : TECHNICAL</i>
580	82	The roles and responsibilities of the authorized entity <del>should</del> include the following:	P	<b>Montenegro</b>  <i>Category : TECHNICAL</i>
581	82	Las funciones y responsabilidades de la entidad autorizada deberían incluir las siguientes:–  <u>- Mantener la confidencialidad de la información obtenida mediante sus acciones fitosanitarias autorizadas.</u>  <u>- Mantener la imparcialidad e independencia con los usuarios relacionados con las acciones fitosanitarias autorizadas, y estar libre de cualquier conflicto de intereses</u>	P	<b>Colombia</b> La información levantada por las entidades autorizadas a realizar acciones fitosanitarias, solo debe ser entregada a la ONPF contratante.  Se debe incluir la responsabilidad de imparcialidad e independencia para generar transparencia en el accionar de la entidad autorizada.  <i>Category : SUBSTANTIVE</i>
582	83	to provide <del>necessary</del> <u>the required</u> information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO	P	<b>Canada</b> More appropriate. The NPPO determines the required information that needs to be provided by the entity. <i>Category : SUBSTANTIVE</i>
583	83	to provide necessary <u>and accurate</u> information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO	P	<b>Viet Nam</b> to Ensure that the entity is held accountable for provision of accurate information to the NPPO <i>Category : SUBSTANTIVE</i>
584	83	to provide necessary information to the NPPO when <del>applying</del> <u>being considered</u> for authorization to perform specific phytosanitary actions on behalf of the NPPO	P	<b>European Union</b> Application may not always be applicable, therefore the more general wording 'being considered' is clearer and more correct. <i>Category : SUBSTANTIVE</i>

585	83	to provide necessary information to the NPPO when applying for authorization to perform specific phytosanitary <del>actions on behalf of the NPPO</del> <u>actions</u>	P	<b>European Union</b> Performing certain tasks does not require legal enforcement to act on NPPO's behalf. <i>Category : SUBSTANTIVE</i>
586	83	to provide necessary information to the NPPO when <del>applying-being considered</del> for authorization to perform specific phytosanitary actions <del>on behalf of the NPPO</del> <u>o</u>	P	<b>EPPO</b> Application may not always be applicable, therefore the more general wording 'being considered' is clearer and more correct.  Performing certain tasks does not require legal enforcement to act on NPPO's behalf. <i>Category : SUBSTANTIVE</i>
587	83	to provide necessary information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO, <u>including a declaration of potential conflict of interest.</u>	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> to ensure that the NPPO is aware of any potential conflict of interest. <i>Category : SUBSTANTIVE</i>
588	83	to provide <del>necessary-required</del> information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO	P	<b>United States of America</b> As per specific requirements by the NPPO. <i>Category : TECHNICAL</i>
589	83	to provide necessary <del>information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO</del> <u>and accurate information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO</u>	P	<b>APPPC</b> (83) Singapore (5 Sep 2018 12:46 PM) To add the word - accurate to Ensure that the entity is held accountable for provision of accurate information to the NPPO.  <i>Category : SUBSTANTIVE</i>
590	83	to provide necessary information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO	C	<b>Jamaica</b> to provide necessary information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO, including a declaration of potential conflict of interest. <i>Category : SUBSTANTIVE</i>
591	83	to provide <u>all</u> necessary information <del>to-required by</del> the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO	P	<b>IPPC Regional Workshop Africa</b>  <i>Category : EDITORIAL</i>
592	83	to provide <del>necessary-necessary</del> <u>and accurate</u> information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO	P	<b>Singapore</b> To add the word " and accurate" yo ensure that the entity is held accountable for provision of accurate information to the NPPO. <i>Category : SUBSTANTIVE</i>
593	83	<del>to provide necessary information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO</del>	P	<b>Nicaragua</b> -proporcionar a la ONPF, al solicitar la autorización, la información necesaria para emprender acciones fitosanitarias específicas en nombre de la ONPF; <i>Category : SUBSTANTIVE</i>
594	83	proporcionar a la ONPF, al solicitar la autorización, la información necesaria para emprender acciones fitosanitarias específicas <del>en nombre de</del> <u>autorizadas por</u> la ONPF;	P	<b>OIRSA</b> Se agregó el termino autorizadas se tachó el termino en nombre de <i>Category : SUBSTANTIVE</i>

595	83	proporcionar a la ONPF, al solicitar la autorización, la información necesaria para emprender acciones fitosanitarias específicas <del>en nombre de autorizadas por la</del> ONPF;	P	<b>Nicaragua</b> proporcionar a la ONPF, al solicitar la autorización, la información necesaria para emprender acciones fitosanitarias específicas en nombre autorizadas por de la ONPF;  Se agregó el termino autorizadas se tachó el termino en nombre de <i>Category : SUBSTANTIVE</i>
596	84	to enter into an arrangement to perform the specific <del>phytosanitary</del> <u>Phytosanitary</u> actions on behalf of the NPPO	P	<b>Ghana</b>  <i>Category : EDITORIAL</i>
597	85	to implement a documented quality management system to conform with the requirements set by the NPPO, which may cover:	C	<b>New Zealand</b> Re. "quality management system". See comment in section 2 relating to confusing requirements that sometimes relate to the QMS and other times relate to the quality manual. It is not clear if an NPPO could determine "documentation in lieu of a quality manual" would apply as an alternative to this requirement.  <i>Category : SUBSTANTIVE</i>
598	85	to implement a documented quality management system to conform with the requirements set by the NPPO, which may cover:  <u>a) quality manual</u>	P	<b>APPPC</b> (59) Thailand (5 Sep 2018 12:19 PM) Thailand would like to rearrange the list of document that should be prepared and implemented under quality management system as follow; a) quality manual b) standard operation procedure including - specific phytosanitary action process - development of personnel competency - document control - internal audit - management of nonconformity C) records, in particular .....  <i>Category : SUBSTANTIVE</i>
599	85	to implement a documented <u>quality management system information</u> to conform with the requirements set by the NPPO, which may cover:	P	<b>APPPC</b> (68) Thailand (5 Sep 2018 12:26 PM) The term "documented information" may be more appropriate in this context as it is more perceivable and has already been used in ISO9001:2015.  <i>Category : SUBSTANTIVE</i>
600	85	to implement a documented quality management system to conform with the requirements set by the NPPO, which may cover:	C	<b>APPPC</b> (126) New Zealand (7 Sep 2018 7:45 AM) Re. "quality management system". See comment in section 2 relating to confusing requirements that sometimes relate to the QMS and other times relate to the quality manual. It is not clear if an NPPO could determine

				"documentation in lieu of a quality manual" would apply as an alternative to this requirement. <i>Category : TECHNICAL</i>
601	85	to implement a documented quality management system to conform with the requirements set by the NPPO, which may cover:	C	<b>Australia</b> There are programs where an officer is authorised and the NPPO and the NPPO writes the instructional material. <i>Category : TECHNICAL</i>
602	85	to implement a documented quality management system to conform with the requirements set by the NPPO, which may cover: <a href="#">a) Quality manual</a>	P	<b>Thailand</b> Thailand would like to rearrange the list of document that should be prepared and implemented under quality management system as follow; a) quality manual b) standard operation procedure including - specific phytosanitary action process - development of personnel competency - document control - internal audit - management of nonconformity C) records, in particular ..... <i>Category : SUBSTANTIVE</i>
603	85	to implement a documented <del>quality management system informaion</del> to conform with the requirements set by the NPPO, which may cover:	P	<b>Thailand</b> The term "documented information" may be more appropriate in this context as it is more perceivable and has already been used in ISO9001:2015. <i>Category : EDITORIAL</i>
604	86	<del>standard operating procedures</del> <u>Standard Operating Procedures</u>	P	<b>Ghana</b> <i>Category : EDITORIAL</i>
605	86	standard operating <del>procedures</del> <u>procedures in including</u>	P	<b>APPPC</b> 60) Thailand (5 Sep 2018 12:21 PM) <i>Category : SUBSTANTIVE</i>
606	86	<a href="#">b)</a> standard operating procedures	P	<b>Thailand</b> <i>Category : EDITORIAL</i>
607	86	un procedimiento <del>normalizado</del> de <del>actuación</del> <u>operación normado</u>	P	<b>OIRSA</b> Para ser consistente con el comentario general <i>Category : TECHNICAL</i>
608	86	un procedimiento <del>normalizado</del> de <del>actuación</del> <u>operación normalizado</u>	P	<b>Costa Rica</b> <i>Category : EDITORIAL</i>
609	87	competency of <del>personnel</del> <u>personnel specific phytosanitary action process</u> <u>- development of personnel competency</u>	P	<b>APPPC</b> (61) Thailand (5 Sep 2018 12:22 PM) <i>Category : SUBSTANTIVE</i>
610	87	<del>competency</del> <u>- specific phytosanitary actions process</u> <u>- development of <del>personnel</del> personnel competency</u>	P	<b>Thailand</b> <i>Category : SUBSTANTIVE</i>

611	88	<del>training of personnel</del>	P	<b>APPPC</b> 62) Thailand (5 Sep 2018 12:23 PM) <i>Category : SUBSTANTIVE</i>
612	88	<del>training of personnel</del>	P	<b>Thailand</b>  <i>Category : SUBSTANTIVE</i>
613	88	<del>formación-Capacitación</del> del personal	P	<b>OIRSA</b> Término mejor <i>Category : EDITORIAL</i>
614	88	<del>formación- capacitación</del> del personal	P	<b>Costa Rica</b> capacitación va mas dirigido al conocimiento que el personal adquiere para desempeñar una función determinada <i>Category : TECHNICAL</i>
615	89	document control	P	<b>PPPO</b> add another bullet point on issuance of lisenca <i>Category : SUBSTANTIVE</i>
616	89	document control, <u>which includes:</u>  <del>- revision of documents</del> <del>- records, in particular of the activities undertaken in relation to the specific phytosanitary actions</del>	P	<b>Japan</b> "revision of documents" and "records, in particular of the activities undertaken in relation to the specific phytosanitary actions" are included "document control" <i>Category : SUBSTANTIVE</i>
617	89	document control  <del>- internal audit</del> <del>- management of nonconformity</del>	P	<b>APPPC</b> (67) Thailand (5 Sep 2018 12:25 PM) <i>Category : EDITORIAL</i>
618	89	document control, <u>which includes:</u>	P	<b>APPPC</b> (140) Japan (9 Sep 2018 1:13 AM) "revision of documents" and "records, in particular of the activities undertaken in relation to the specific phytosanitary actions" are included "document control"  <i>Category : SUBSTANTIVE</i>
619	89	document control <del>- internal audit</del> <del>- management of nonconformity</del>	P	<b>Thailand</b>  <i>Category : EDITORIAL</i>
620	90	<del>revision of documents</del>	P	<b>Japan</b> "revision of documents" and "records, in particular of the activities undertaken in relation to the specific phytosanitary actions" are included "document control" <i>Category : SUBSTANTIVE</i>
621	90	<del>revision of documents</del>	P	<b>APPPC</b> (63) Thailand (5 Sep 2018 12:24 PM)

				<i>Category : EDITORIAL</i>
622	90	<del>revision of documents</del>	P	<b>Thailand</b> <i>Category : SUBSTANTIVE</i>
623	91	records, in particular of the activities undertaken in relation to the specific <del>phytosanitary</del> <u>Phytosanitary</u> actions	P	<b>Ghana</b> <i>Category : EDITORIAL</i>
624	91	<del>records, in particular of the activities undertaken in relation to the specific phytosanitary actions</del>	P	<b>Japan</b> "revision of documents" and "records, in particular of the activities undertaken in relation to the specific phytosanitary actions" are included "document control" <i>Category : SUBSTANTIVE</i>
625	91	records, in particular of the activities undertaken in relation to the specific phytosanitary actions  <u>- list of equipment and their maintenance / calibration schedule to be used for the Phytosanitary actions that the entity is authorised to perform.</u>	P	<b>APPPC</b> 84) Singapore (5 Sep 2018 12:48 PM) To include the list of equipment used inside the overall quality management manual to ensure accountability of proper equipment used. <i>Category : SUBSTANTIVE</i>
626	91	<u>c)</u> records, in particular of the activities undertaken in relation to the specific phytosanitary actions	P	<b>Thailand</b> <i>Category : EDITORIAL</i>
627	91	records, in particular of the activities undertaken in relation to the specific phytosanitary actions  <u>- list of equipment and their maintenance/calibration schedule to be used for the phytosanitary actions that the entity is authorised to perform.</u>	P	<b>Singapore</b> To include a list of equipment used in the phytosanitary actions inside the overall quality management manual to ensure accountability of the proper equipment used. <i>Category : SUBSTANTIVE</i>
628	92	<del>internal audit</del>	P	<b>APPPC</b> 65) Thailand (5 Sep 2018 12:24 PM) <i>Category : EDITORIAL</i>
629	92	<del>internal audit</del>	P	<b>Thailand</b> <i>Category : EDITORIAL</i>
630	93	management of nonconformity  <u>-to provide notification (within an agreed time frame) to the NPPO upon a major change in management, site/location, non-conformity, or the outsourcing of phytosanitary activities to another third party entity</u>	P	<b>Australia</b> Clarification as these are also elements are also a responsibility of an authorised entity. <i>Category : TECHNICAL</i>
631	93	management of <del>noneonformity</del> <u>non-conformity</u>	P	<b>Japan</b> <i>Category : EDITORIAL</i>
632	93	management of <del>noneonformity</del>	P	<b>APPPC</b> 8) Nepal (9 Aug 2018 5:17 PM) <i>Category : SUBSTANTIVE</i>

		<a href="#">☐ To conduct PRA and surveillance management of noneonformity</a>		
633	93	<a href="#">management of noneonformity</a>	P	<b>APPPC</b> (66) Thailand (5 Sep 2018 12:24 PM) <i>Category : EDITORIAL</i>
634	93	<a href="#">management of nonconformity</a>	P	<b>Thailand</b>  <i>Category : EDITORIAL</i>
635	94	to maintain <del>infrastructure, where applicable, infrastructure</del> and resources to consistently carry out the actions necessary to conform with the requirements set by the NPPO	P	<b>European Union</b> Infrastructure is always applicable. <i>Category : SUBSTANTIVE</i>
636	94	to maintain infrastructure, where applicable, and resources to consistently carry out the <a href="#">specific phytosanitary actions necessary to conform in compliance</a> with the requirements set by the NPPO	P	<b>European Union</b> Better wording. <i>Category : EDITORIAL</i>
637	94	to maintain <del>infrastructure, where applicable, infrastructure</del> and resources to consistently carry out the <a href="#">specific phytosanitary actions necessary to conform in compliance</a> with the requirements set by the NPPO	P	<b>EPPO</b> Better wording  Infrastructure is Always applicable. <i>Category : SUBSTANTIVE</i>
638	94	to maintain <del>infrastructure</del> <a href="#">infrastructure and security</a> , where applicable, and resources to consistently carry out the actions necessary to conform with the requirements set by the NPPO	P	<b>Australia</b> Clarification <i>Category : TECHNICAL</i>
639	95	to ensure personnel have the relevant education and experience to perform the specific phytosanitary actions, <a href="#">and to ensure that their skills and competencies are maintained at an adequate level to consistently carry out the actions necessary to conform with the requirements set by the NPPO</a>	P	<b>Panama</b> To simplify and clarity <i>Category : EDITORIAL</i>
640	95	to ensure personnel have the relevant education and experience <a href="#">required by the NPPO</a> to perform the specific phytosanitary actions	P	<b>Viet Nam</b> The relevant education and experience for personnel should be required by the NPPO <i>Category : SUBSTANTIVE</i>
641	95	to ensure personnel have the relevant education and experience to perform the specific <del>phytosanitary</del> <a href="#">Phytosanitary</a> actions	P	<b>Ghana</b>  <i>Category : EDITORIAL</i>
642	95	to ensure personnel have the relevant education and experience <a href="#">required by the NPPO</a> to perform the specific phytosanitary actions	P	<b>Japan</b> The relevant education and experience for personnel should be ones required by the NPPO. <i>Category : SUBSTANTIVE</i>
643	95	to ensure personnel have the relevant education and experience <a href="#">required by the NPPO</a> to perform the specific phytosanitary actions	P	<b>APPPC</b> (139) Japan (9 Sep 2018 1:09 AM) The relevant education and experience for personnel should be ones required by the NPPO

				<i>Category : SUBSTANTIVE</i>
644	95	to ensure personnel have the relevant education and experience to perform the specific phytosanitary <del>actions</del> <u>actions on behalf of the NPPO</u>	P	<b>APPPC</b> (167) Philippines (12 Sep 2018 3:30 AM) <i>Category : SUBSTANTIVE</i>
645	95	to ensure personnel have the relevant education and experience <u>required by the NPPO</u> to perform the specific phytosanitary actions	P	<b>IPPC Regional Workshop Africa</b> <i>Category : EDITORIAL</i>
646	95	to ensure personnel have the relevant education and experience to perform the specific phytosanitary actions	C	<b>Australia</b> This may not always be applicable as individuals may be trained and assessed by the NPPO prior to being approved. <i>Category : TECHNICAL</i>
647	95	to ensure personnel have the relevant <del>education</del> <u>training</u> and experience to perform the specific phytosanitary actions	P	<b>Australia</b> Clarification <i>Category : TECHNICAL</i>
648	95	to ensure personnel have the relevant education and experience to perform the specific phytosanitary <del>actions</del> <u>actions and to ensure that their skills and competencies are maintained at an adequate level to consistently carry out the actions necessary to conform with the requirements set by the NPPO</u>	P	<b>Costa Rica</b> To simplify and clarity. join this sentence with the following <i>Category : EDITORIAL</i>
649	95	to ensure personnel have the relevant education and experience <u>required by the NPPO</u> to perform the specific phytosanitary actions	P	<b>Eritrea</b> <i>Category : EDITORIAL</i>
650	95	<del>asegurarse</del> <u>Asegurarse</u> de que el personal cuente con la <del>formación</del> <u>capacitación</u> y experiencia necesarias para emprender las acciones fitosanitarias específicas; <u>garantizando que sus conocimientos especializados y competencias se mantengan en un nivel suficiente para cumplir los requisitos establecidos por la ONPF.</u>	P	<b>OIRSA</b> Se recomienda unificar párrafos 95 y 96 ya que plantean similares funciones y responsabilidades de la entidad autorizada. <i>Category : SUBSTANTIVE</i>
651	96	<del>to train personnel and ensure that their skills and competencies are maintained at an adequate level to consistently carry out the actions necessary to conform with the requirements set by the NPPO</del>	P	<b>Panama</b> incorporated above <i>Category : EDITORIAL</i>
652	96	to train personnel and ensure that their skills and competencies are maintained at an adequate level to consistently carry out the <u>specific phytosanitary</u> actions <del>necessary to conform in compliance</del> with the requirements set by the NPPO	P	<b>European Union</b> Better wording. <i>Category : EDITORIAL</i>
653	96	to train personnel and ensure that their skills and competencies are maintained at an adequate level to consistently carry out the <u>specific phytosanitary</u> actions <del>necessary to conform in compliance</del> with the requirements set by the NPPO	P	<b>EPPO</b> Better wording <i>Category : EDITORIAL</i>
654	96	<del>to train personnel and ensure that their skills and competencies are maintained at an adequate level to consistently carry out the actions necessary to conform with the requirements set by the NPPO</del>	P	<b>Costa Rica</b> incorporated above <i>Category : EDITORIAL</i>
655	96	<del>formar al</del> <u>Asegurarse de que el personal cuente con la capacitación y garantizar experiencia necesarias para emprender las acciones fitosanitarias específicas.</u> <u>garantizando</u> que sus conocimientos especializados y competencias se mantengan	P	<b>OIRSA</b> Se recomienda unificar ambos párrafos 95 y 96 ya que plantean similares funciones y responsabilidades de la entidad autorizada. <i>Category : SUBSTANTIVE</i>

		en un nivel suficiente para <del>llevar a cabo de forma sistemática las acciones necesarias a fin de</del> cumplir los requisitos establecidos por la ONPF;		
656	97	to maintain and provide quality management system documents (including <del>records</del> <u>records of its activities</u> ) to the NPPO as required	P	<b>European Union</b> More precise wording. <i>Category : TECHNICAL</i>
657	97	to maintain and provide quality management system documents (including <del>records</del> <u>records of its activities</u> ) to the NPPO as required	P	<b>EPPO</b> More precise wording <i>Category : TECHNICAL</i>
658	97	to maintain and provide quality <del>management system documents documented</del> <u>information</u> (including records) to the NPPO as required	P	<b>APPPC</b> (69) Thailand (5 Sep 2018 12:27 PM) The term "documented information" may be more appropriate in this context as it is more perceivable and has already been used in ISO9001:2015.  <i>Category : SUBSTANTIVE</i>
659	97	to maintain and provide quality management system documents (including records) to the NPPO as required	C	<b>APPPC</b> (127) New Zealand (7 Sep 2018 7:46 AM) Re. "quality management system". See comment in section 2 relating to confusing requirements that sometimes relate to the QMS and other times relate to the quality manual. It is not clear if an NPPO could determine "documentation in lieu of a quality manual" would apply as an alternative to this requirement.  <i>Category : TECHNICAL</i>
660	97	to maintain and provide <del>quality management system documents (including records)</del> <u>documented information</u> to the NPPO as required	P	<b>Thailand</b> The term "documented information" may be more appropriate in this context as it is more perceivable and has already been used in ISO9001:2015. <i>Category : EDITORIAL</i>
661	98	to undergo audits <u>and control</u> by the NPPO (or its authorized entity) as described in the requirements set by the NPPO.	P	<b>European Union</b> NPPO should have rights to carry out controls in any moment. <i>Category : SUBSTANTIVE</i>
662	98	to undergo audits <u>and control</u> by the NPPO (or its authorized entity) as described in the requirements set by the NPPO.	P	<b>EPPO</b> NPPO should have rights to make control in any moment. <i>Category : SUBSTANTIVE</i>
663	98	to undergo audits by the NPPO (or its authorized entity) as described in the requirements set by the NPPO.	C	<b>Ukraine</b> We would like to suggest adding a paragraph: to meet requirements set by phytosanitary procedures, standards, legislation and guidelines of NPPO <i>Category : SUBSTANTIVE</i>
<b>3.2.1 Roles and responsibilities of entities authorized to audit or supervise</b>				
664	99	<del><b>3.2.1</b> <b>Roles and responsibilities of entities authorized to audit or supervise</b></del>	P	<b>European Union</b> Deletion of the section is proposed. There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here.

					This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i>
665	99	<del>3.2.1 Roles and responsibilities of entities authorized to audit or supervise</del>		P	<b>EPPO</b> Deletion of the section is proposed. There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i>
666	99	<del>3.2.1 Roles and responsibilities of entities authorized to audit or supervise</del>		P	<b>IPPC Regional Workshop Central Asia &amp; Central Europe</b> Delete as it was not in the specifications (to be covered in ISPM audits in phytosanitary context)  Исключить, поскольку это не было указано в спецификациях (которые должны охватываться Стандартом МСФМ по аудиту в фитосанитарном контексте) <i>Category : SUBSTANTIVE</i>
667	99	<del>3.2.1 Roles and responsibilities of entities authorized to audit or supervise</del>		P	<b>China</b> The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i>
668	99	<b>3.2.1 Roles and responsibilities of entities authorized to audit or supervise</b>		C	<b>United States of America</b> See our comment in the para 55. <i>Category : TECHNICAL</i>
669	99	<del>3.2.1 Roles and responsibilities of entities authorized to audit or supervise</del>		P	<b>APPPC</b> 36) China (3 Sep 2018 10:18 AM) The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i>
670	99	<del>34.2.1 Roles and responsibilities of entities authorized to audit or supervise</del>		P	<b>APPPC</b> (70) Thailand (5 Sep 2018 12:28 PM) re-numbering <i>Category : EDITORIAL</i>
671	99	<del>3.2.1 Roles and responsibilities of entities authorized to in process for audit or supervise</del>		P	<b>Montenegro</b> <i>Category : SUBSTANTIVE</i>
672	99	<del>34.2.1 Roles and responsibilities of entities authorized to audit or supervise</del>		P	<b>Thailand</b> re-numbering <i>Category : EDITORIAL</i>

673	99	<b>3.2.1 Roles and responsibilities of entities authorized to audit or supervise</b>	C	<b>Ukraine</b> We do not support this subpart in general. The audit and supervision shall not be delegated to an entity. They shall be performed by an NPPO exclusively.  <i>Category : SUBSTANTIVE</i>
674	99	<del><b>3.2.1 Funciones y responsabilidades de las entidades autorizadas para auditar o supervisar</b></del>	P	<b>OIRSA</b> Este concepto no está contemplado en el ámbito de la norma. Conceptualmente adiciona un nivel más de complejidad ya que la ONPF autorizaría a otra entidad para la auditoría y supervisión que igualmente, en teoría, requeriría de auditoría y supervisión ya que es otra entidad autorizada, convirtiéndose en un círculo viciosos y alejando más a la ONPF de sus obligaciones primarias. La ONPF debe ser la autoridad que supervisa y audita. <i>Category : TECHNICAL</i>
675	99	<del><b>3.2.13</b></del> <b>Funciones y responsabilidades de las entidades autorizadas para auditar o supervisar</b>	P	<b>Costa Rica</b> si se considera que además de la entidades autorizadas también la ONPF puede autorizar a empresas que realicen la supervisión estas debería estar bajo el control de la ONPF y no bajo las entidades autorizadas, dado que podría existir conflictos de interés. <i>Category : SUBSTANTIVE</i>
676	100	<del>An entity that audits other authorized entities or supervises phytosanitary actions should:</del>	P	<b>IPPC Regional Workshop Central Asia &amp; Central Europe</b>  <i>Category : SUBSTANTIVE</i>
677	100	<del>An entity that audits other authorized entities or supervises phytosanitary actions should:</del>	P	<b>European Union</b> See our comment on para [99]. <i>Category : SUBSTANTIVE</i>
678	100	An entity that audits other authorized entities or supervises <del>phytosanitary</del> <u>Phytosanitary</u> actions should:	P	<b>Ghana</b>  <i>Category : EDITORIAL</i>
679	100	<del>An entity that audits other authorized entities or supervises phytosanitary actions should:</del>	P	<b>China</b> The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i>
680	100	<del>An entity that audits other authorized entities or supervises phytosanitary actions should:</del>	P	<b>APPPC</b> (37) China (3 Sep 2018 10:18 AM) The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO.  <i>Category : SUBSTANTIVE</i>
681	100	<del>An entity that</del> <u>For</u> audits <del>other authorized entities process</del> or supervises <u>of</u> phytosanitary actions <u>NPPO</u> should:	P	<b>Montenegro</b>  <i>Category : SUBSTANTIVE</i>

682	100	An entity that audits other authorized entities or supervises phytosanitary <del>actions</del> <del>should</del> <del>actions</del> :	P	<b>Montenegro</b> <i>Category : TECHNICAL</i>
683	100	<del>Una entidad que audita a otras entidades autorizadas o supervisa las acciones fitosanitarias debería:</del>	P	<b>OIRSA</b> Este concepto no está contemplado en el ámbito de la norma. Conceptualmente adiciona un nivel más de complejidad ya que la ONPF autorizaría a otra entidad para la auditoria y supervisión que igualmente, en teoría, requeriría de auditoria y supervisión ya que es otra entidad autorizada, convirtiéndose en un círculo viciosos y alejando más a la ONPF de sus obligaciones primarias. La ONPF debe ser la autoridad que supervisa y audita. <i>Category : TECHNICAL</i>
684	101	<del>develop and carry out an action plan or procedures for dealing with nonconformities that compromise the integrity of and trust in the programme, including notification of these to the authorizing NPPO</del>	P	<b>IPPC Regional Workshop Central Asia &amp; Central Europe</b> <i>Category : SUBSTANTIVE</i>
685	101	<del>develop and carry out an action plan or procedures for dealing with nonconformities that compromise the integrity of and trust in the programme, including notification of these to the authorizing NPPO</del>	P	<b>European Union</b> See our comment on para [99]. <i>Category : SUBSTANTIVE</i>
686	101	develop and carry out an action plan or procedures for dealing with <del>nonconformities</del> <u>non-conformities</u> that compromise the integrity of and trust in the programme, including notification of <del>these to</del> <u>these to</u> the authorizing NPPO	P	<b>Japan</b> <i>Category : EDITORIAL</i>
687	101	<del>develop and carry out an action plan or procedures for dealing with nonconformities that compromise the integrity of and trust in the programme, including notification of these to the authorizing NPPO</del>	P	<b>China</b> The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i>
688	101	<del>develop and carry out an action plan or procedures for dealing with nonconformities that compromise the integrity of and trust in the programme, including notification of these to the authorizing NPPO</del>	P	<b>APPPC</b> (38) China (3 Sep 2018 10:19 AM) <i>Category : SUBSTANTIVE</i>
689	101	develop and carry out an action plan or procedures for dealing with nonconformities that compromise the integrity of and trust in the programme, including notification of <del>these to</del> <u>these to</u> the authorizing NPPO	P	<b>APPPC</b> (106) New Zealand (7 Sep 2018 6:44 AM) <i>Category : EDITORIAL</i>
690	101	develop and carry out an action plan or procedures for dealing with nonconformities that compromise the integrity of and trust in the programme, including notification of <del>these to</del> <u>these to</u> the authorizing NPPO	P	<b>NEPPO</b> <i>Category : EDITORIAL</i>
691	101	<del>formular y ejecutar un plan de acción o procedimiento para gestionar las no conformidades que comprometan la confianza en el programa y su integridad, incluida la notificación de tales no conformidades a la ONPF responsable de la autorización;</del>	P	<b>OIRSA</b> Este concepto no está contemplado en el ámbito de la norma. Conceptualmente adiciona un nivel más de complejidad ya que la ONPF autorizaría a otra entidad para la auditoria y supervisión que igualmente, en teoría, requeriría de auditoria y supervisión ya que es otra entidad autorizada, convirtiéndose en un círculo viciosos y alejando más a la ONPF de sus obligaciones primarias. La ONPF debe ser la autoridad que supervisa y audita.

				<i>Category : SUBSTANTIVE</i>
692	102	<del>maintain confidentiality of information gained through its phytosanitary actions</del>	P	<b>IPPC Regional Workshop Central Asia &amp; Central Europe</b> <i>Category : SUBSTANTIVE</i>
693	102	<del>maintain confidentiality of information gained through its phytosanitary actions</del>	P	<b>European Union</b> See our comment on para [99]. <i>Category : SUBSTANTIVE</i>
694	102	maintain confidentiality of information gained through its <del>phytosanitary</del> <u>Phytosanitary</u> actions	P	<b>Ghana</b> <i>Category : EDITORIAL</i>
695	102	maintain confidentiality of information gained through its <u>audit or supervision of</u> phytosanitary actions	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> For clarity and consistency <i>Category : SUBSTANTIVE</i>
696	102	<del>maintain confidentiality of information gained through its phytosanitary actions</del>	P	<b>Japan</b> Maintaining confidentiality is mentioned only in this paragraph in this draft ISPM. In addition, confidentiality is not specified in other ISPMs. <i>Category : SUBSTANTIVE</i>
697	102	<del>maintain confidentiality of information gained through its phytosanitary actions</del>	P	<b>China</b> The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i>
698	102	<del>maintain confidentiality of information gained through its phytosanitary actions</del>	P	<b>APPPC</b> (146) Japan (10 Sep 2018 2:28 PM) Maintaining confidentiality is mentioned only in this paragraph in this draft ISPM. In addition, confidentiality is not specified in other ISPMs. (39) China (3 Sep 2018 10:20 AM) <i>Category : SUBSTANTIVE</i>
699	102	maintain confidentiality of information gained through its phytosanitary actions	C	<b>Jamaica</b> maintain confidentiality of information gained through its audit or supervision of phytosanitary actions <i>Category : SUBSTANTIVE</i>
700	102	maintain confidentiality of information gained through its <u>supervision of</u> phytosanitary actions	P	<b>Antigua and Barbuda</b> There is some confusion here as to which phytosanitary actions are being referred to. The auditor or supervisor is not executing the phytosanitary actions but merely auditing or supervising them. <i>Category : TECHNICAL</i>
701	102	mantener la confidencialidad de la información <del>obtenida mediante sus acciones fitosanitarias; que se genera a partir de la auditoria o supervisión.</del>	P	<b>OIRSA</b> El párrafo 100 indica que estas entidades son de tipo auditora o supervisora según el caso; por lo cual no estarían implementando acciones fitosanitarias propias. La información por la cual deberían mantener la confidencialidad serían aquellas generadas como resultado de esas dos actividades: auditoria o supervisión.

				<i>Category : TECHNICAL</i>
702	102	<del>mantener la confidencialidad de la información obtenida mediante sus acciones fitosanitarias;</del>	P	<b>OIRSA</b> Este concepto no está contemplado en el ámbito de la norma. Conceptualmente adiciona un nivel más de complejidad ya que la ONPF autorizaría a otra entidad para la auditoría y supervisión que igualmente, en teoría, requeriría de auditoría y supervisión ya que es otra entidad autorizada, convirtiéndose en un círculo viciosos y alejando más a la ONPF de sus obligaciones primarias. La ONPF debe ser la autoridad que supervisa y audita. <i>Category : SUBSTANTIVE</i>
703	102	<del>mantener la confidencialidad de la información obtenida mediante sus acciones fitosanitarias que se genera a partir de la auditoría o supervisión;</del>	P	<b>Costa Rica</b> El párrafo 100 indica que estas entidades son de tipo auditora o supervisora según el caso; por lo cual no estarían implementando acciones fitosanitarias propias. La información por la cual deberían mantener la confidencialidad serían aquellas generadas como resultado de esas dos actividades: auditoría o supervisión. <i>Category : SUBSTANTIVE</i>
704	103	<del>maintain impartiality and independence from the entities to be audited or supervised, and be free from any conflict of interest.</del>	P	<b>IPPC Regional Workshop Central Asia &amp; Central Europe</b> <i>Category : SUBSTANTIVE</i>
705	103	maintain impartiality and independence from the entities to be audited or supervised, and be free from any <del>conflict of</del> <u>conflict of</u> interest.  <del>- to ensure personnel have the relevant training and experience to perform the specific audits being conducted</del> <del>- undertake internal audits to provide continuous feedback and identify system gaps (if applicable).</del>	P	<b>Australia</b> These are important components to ensure appropriate auditing. <i>Category : TECHNICAL</i>
706	103	maintain impartiality and independence from the entities to be audited or supervised, and be free from any <del>conflict of</del> <u>conflict of</u> interest.	P	<b>Viet Nam</b> <i>Category : EDITORIAL</i>
707	103	<del>maintain impartiality and independence from the entities to be audited or supervised, and be free from any conflict of interest.</del>	P	<b>European Union</b> See our comment on para [99]. <i>Category : SUBSTANTIVE</i>
708	103	maintain impartiality and independence from the entities to be audited or supervised, and be free from any <del>conflict of</del> <u>conflict of</u> interest.	P	<b>Japan</b> <i>Category : EDITORIAL</i>
709	103	<del>maintain impartiality and independence from the entities to be audited or supervised, and be free from any conflict of interest.</del>	P	<b>China</b> The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i>
710	103	<del>maintain impartiality and independence from the entities to be audited or supervised, and be free from any conflict of interest.</del>	P	<b>APPPC</b> (40) China (3 Sep 2018 10:20 AM) <i>Category : SUBSTANTIVE</i>

711	103	maintain impartiality and independence from the entities to be audited or supervised, and be free from any <del>conflict of</del> <u>conflict of</u> interest.	P	<b>APPPC</b> (107) New Zealand (7 Sep 2018 6:44 AM) <i>Category : EDITORIAL</i>
712	103	maintain impartiality and independence from the entities <del>to be audited-it audits</del> or <del>supervised</del> <u>supervise</u> , and be free from any conflict of interest.	P	<b>APPPC</b> (128) New Zealand (7 Sep 2018 7:47 AM) Also see general comment re. supervision <i>Category : TECHNICAL</i>
713	103	maintain impartiality and independence from the entities to be audited or supervised, and be free from any conflict of interest.	C	<b>Mauritius</b> Publish the list of authorized entities for information of local stakeholder and NPPO of importing countries. (Proposed to add this additional requirement to the list) <i>Category : TECHNICAL</i>
714	103	<del>mantener la imparcialidad e independencia de las entidades que vayan a ser auditadas o supervisadas, y estar libre de cualquier conflicto de intereses.</del>	P	<b>OIRSA</b> Este concepto no está contemplado en el ámbito de la norma. Conceptualmente adiciona un nivel más de complejidad ya que la ONPF autorizaría a otra entidad para la auditoría y supervisión que igualmente, en teoría, requeriría de auditoría y supervisión ya que es otra entidad autorizada, convirtiéndose en un círculo viciosos y alejando más a la ONPF de sus obligaciones primarias. La ONPF debe ser la autoridad que supervisa y audita. <i>Category : SUBSTANTIVE</i>
<b>4. Process for Audits</b>				
715	104	<b>4. Process for Audits</b>	C	<b>United States of America</b> See comment in para 55 <i>Category : TECHNICAL</i>
716	104	<del>4.5.</del> <u>Types of Process for Audits</u>	P	<b>APPPC</b> (71) Thailand (5 Sep 2018 12:29 PM) - re-numbering - The term "Types of Audits" is more appropriate than the term "process" as it is not a set of actions for auditing. <i>Category : SUBSTANTIVE</i>
717	104	<del>4.5.</del> <u>Process for Audits</u> <u>Types of Audits</u>	P	<b>Thailand</b> The term "Types of Audits" is more appropriate than the term "process" as it is not a set of actions for auditing. <i>Category : SUBSTANTIVE</i>
718	104	<b>4. Process for Audits</b>	C	<b>Ukraine</b> The audit and supervision shall not be delegated to an entity. They shall be performed by an NPPO exclusively. <i>Category : SUBSTANTIVE</i>
<b>4.1 Audits to authorize an entity</b>				
719	105	<del>4.5.1</del> <b>Audits to authorize an entity</b>	P	<b>APPPC</b> (72) Thailand (5 Sep 2018 12:29 PM) re-numbering <i>Category : EDITORIAL</i>

720	105	<b>4.1 Audits to authorize <u>or not to authorize</u> an entity</b>	P	<b>IPPC Regional Workshop Africa</b> <i>Category : EDITORIAL</i>
721	105	<b>4.1 Audits to authorize an entity</b>	C	<b>Australia</b> It seems practical to make an additional section on the authorisation of individuals as well as entities. This would include some form of competency assessment to ensure the individual meets the requirements of the NPPO. <i>Category : TECHNICAL</i>
722	105	<b>4.5.1 Audits to authorize an entity</b>	P	<b>Thailand</b> re-numbering <i>Category : EDITORIAL</i>
723	105	<b>4.1 Audits to authorize <u>or not to authorize</u> an entity</b>	P	<b>Eritrea</b> <i>Category : EDITORIAL</i>
724	105	<b>4.1 Audits to authorize an entity</b>	C	<b>Mexico</b> In follow-up to the previous comment it is necessary to include the procedure of how the NPPO will authorize the entities that carried out the audits, since they must have experience and competence. <i>Category : SUBSTANTIVE</i>
725	105	<b>4.1 Auditorías para autorizar a una entidad</b>	C	<b>OIRSA</b> Fiscalización extraordinaria <i>Category : TECHNICAL</i>
726	106	Before <del>granting authorization</del> authorizing, the NPPO ( <del>or its authorized entity</del> ) should carry out an initial evaluation of the <del>entity's entity and its</del> quality manual (or documentation in lieu of a quality manual).	P	<b>European Union</b> There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i>
727	106	Before <del>granting authorization</del> authorizing, the NPPO ( <del>or its authorized entity</del> ) should carry out an initial evaluation of the <del>entity's entity and its</del> quality manual (or documentation in lieu of a quality manual).	P	<b>EPPO</b> There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i>
728	106	Before granting authorization, the NPPO ( <del>or its authorized entity</del> ) should carry out an initial evaluation of the entity's quality manual (or documentation in lieu of a quality manual).	P	<b>IPPC Regional Workshop Central Asia &amp; Central Europe</b> In line with the deletion of section 3.2.1. <i>Category : EDITORIAL</i>
729	106	Before granting authorization, the NPPO ( <del>or its authorized entity</del> ) should carry out an initial evaluation of the entity's quality manual (or documentation in lieu of a quality manual).	P	<b>China</b> The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i>

730	106	Before granting authorization, the <del>NPPO (or its authorized entity)</del> NPPO should carry out an initial evaluation of the entity's quality manual (or documentation in lieu of a quality manual).	P	<b>APPPC</b> 41) China (3 Sep 2018 10:22 AM) The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i>
731	107	When the quality manual (or other documentation <del>sufficient-satisfactory</del> to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement the standard operating procedures for each phytosanitary action.	P	<b>Canada</b> More appropriate term. <i>Category : EDITORIAL</i>
732	107	<del>When-Once</del> the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement the standard operating procedures for each phytosanitary action.	P	<b>Grenada</b> <i>Category : EDITORIAL</i>
733	107	When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement the standard operating procedures for each phytosanitary action.	C	<b>Grenada</b> This standard is necessary and endorsed by the NPPO of Grenada <i>Category : SUBSTANTIVE</i>
734	107	<del>When-Once</del> the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement the standard operating procedures for each phytosanitary action.	P	<b>Grenada</b> <i>Category : EDITORIAL</i>
735	107	When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity <del>to implement to implement</del> the standard operating procedures for each phytosanitary action.	P	<b>Viet Nam</b> <i>Category : EDITORIAL</i>
736	107	When the quality manual (or <del>other</del> documentation <del>sufficient to address the specific phytosanitary actions) in lieu of a quality manual</del> ) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity <del>to implement to implement</del> the standard operating procedures for each phytosanitary action.	P	<b>European Union</b> Consistency with paragraph 66 (and paragraph 106). <i>Category : EDITORIAL</i>
737	107	When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity <del>to implement to implement</del> the <del>documented</del> standard operating procedures for each phytosanitary action.	P	<b>European Union</b> As according to paragraph 66 the: documented quality management system = documented quality manual (or documentation in lieu of a quality manual) + documented standard operating procedures, standard operating procedures should be "documented" (i.e. in

				written). <i>Category : TECHNICAL</i>
738	107	When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO ( <del>or its authorized entity</del> ) should carry out an audit to evaluate the entire system and the capability of the entity <del>to implement to implement</del> the standard operating procedures for each phytosanitary action.	P	<b>European Union</b> There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i>
739	107	When the quality manual (or <del>other</del> documentation <del>sufficient to address the specific phytosanitary actions) in lieu of a quality manual</del> ) is acceptable, the NPPO ( <del>or its authorized entity</del> ) should carry out an audit to evaluate the entire system and the capability of the entity to implement the <u>documented</u> standard operating procedures for each phytosanitary action.	P	<b>EPPO</b> As according to paragraph 66 the: documented quality management system = documented quality manual (or documentation in lieu of a quality manual) + documented standard operating procedures, standard operating procedures should be "documented" (i.e. in written) .  There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context".  Consistency with paragraph 66 (and paragraph 106). <i>Category : EDITORIAL</i>
740	107	<del>When Once</del> the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement the standard operating procedures for each phytosanitary action.	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> <i>Category : EDITORIAL</i>
741	107	When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO ( <del>or its authorized entity</del> ) should carry out an audit to evaluate the entire system and the capability of the entity to implement the standard operating procedures for each phytosanitary action.	P	<b>IPPC Regional Workshop Central Asia &amp; Central Europe</b> In line with the deletion of section 3.2.1. <i>Category : EDITORIAL</i>
742	107	When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity <del>to implement to implement</del> the standard operating procedures for each phytosanitary action.	P	<b>Japan</b> <i>Category : EDITORIAL</i>
743	107	When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the <del>NPPO (or its authorized entity)</del> <u>NPPO</u> should carry out an audit to evaluate the entire system and the capability of the entity to implement the standard operating procedures for each phytosanitary action.	P	<b>China</b> The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i>

744	107	When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO ( <del>or its authorized entity</del> ) should carry out an audit to evaluate the entire system and the capability of the entity to implement the standard operating procedures for each phytosanitary action.	P	<b>APPPC</b> (42) China (3 Sep 2018 10:22 AM) The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i>
745	107	When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity <del>to implement to implement</del> the standard operating procedures for each phytosanitary action.	P	<b>APPPC</b> (108) New Zealand (7 Sep 2018 6:44 AM) (85) Singapore (5 Sep 2018 12:49 PM) Missing space 9) Nepal (9 Aug 2018 5:19 PM) <i>Category : EDITORIAL</i>
746	107	When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement the standard operating procedures for each phytosanitary action.	C	<b>Australia</b> This may not always be applicable as individuals may be trained and assessed by the NPPO prior to being approved. The individuals quality manual would not be evaluated by the NPPO only their competency. As per the previous comment, it seems practical to make an additional section on the authorisation of individuals as well as entities. <i>Category : TECHNICAL</i>
747	107	When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity <del>to implement to implement</del> the standard operating procedures for each phytosanitary action.	P	<b>NEPPO</b> <i>Category : EDITORIAL</i>
748	107	When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity <del>to implement to implement</del> the standard operating procedures for each phytosanitary action.	P	<b>Singapore</b> <i>Category : EDITORIAL</i>
749	107	Cuando el manual de calidad (u otra documentación suficiente para abordar las acciones fitosanitarias específicas) sea aceptable, la ONPF (o la entidad autorizada por la ONPF) debería llevar a cabo una auditoría a fin de evaluar todo el sistema y la capacidad de la entidad para aplicar el procedimiento normalizado de actuación respecto de cada acción fitosanitaria.  <u>La ONPF debería normalmente otorgar autorización a la entidad si la auditoría del sistema realizada por la ONPF (o por la entidad autorizada por esta) demuestra el cumplimiento de los requisitos de la ONPF para la autorización de entidades.</u>	P	<b>Costa Rica</b> <i>Category : EDITORIAL</i>
750	108	At each step of the audit, the NPPO ( <del>or its authorized entity</del> ) should provide recommendations for improvement as necessary.	P	<b>Viet Nam</b> The supervision and auditing to entities should be performed by

				NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO <i>Category : SUBSTANTIVE</i>
751	108	At each step of the audit, the NPPO ( <del>or its authorized entity</del> ) should provide recommendations for improvement as necessary.	P	<b>European Union</b> There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i>
752	108	At each step of the audit, the NPPO ( <del>or its authorized entity</del> ) should provide recommendations for improvement as necessary.	P	<b>EPPO</b> There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i>
753	108	At each step of the audit, the NPPO ( <del>or its authorized entity</del> ) should provide recommendations for improvement as necessary.	P	<b>IPPC Regional Workshop Central Asia &amp; Central Europe</b> In line with the deletion of section 3.2.1. <i>Category : EDITORIAL</i>
754	108	At each step of the audit, the NPPO ( <del>or its authorized entity</del> ) should provide recommendations for improvement as necessary.	P	<b>China</b> The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i>
755	108	At each step of the audit, the NPPO ( <del>or its authorized entity</del> ) should provide recommendations for improvement as necessary.	P	<b>APPPC</b> 43) China (3 Sep 2018 10:23 AM) The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i>
756	108	<del>At each step of the audit, the</del> The NPPO (or its authorized entity) <del>should</del> may provide <del>recommendations</del> observation or opportunity for improvement (OFI) as necessary.	P	<b>APPPC</b> (73) Thailand (5 Sep 2018 12:30 PM) Thailand would like to revise this paragraph by employing common terms used in auditing. So, the term "recommendation" should be replaced by the term "observation and OFI". <i>Category : SUBSTANTIVE</i>
757	108	<del>At each step of the audit, the</del> The NPPO (or its authorized entity) <del>should</del> may provide <del>recommendations</del> observation or opportunity for improvement (OFI) as necessary.	P	<b>Thailand</b> Thailand would like to revise this paragraph by employing common terms used in auditing. So, the term "recommendation" should be replaced by the term "observation and OFI". <i>Category : SUBSTANTIVE</i>
758	108	At each step of the audit, the NPPO (or its authorized entity) should provide recommendations for improvement as necessary.	C	<b>Ukraine</b> Suggested version: At each step of the audit, the NPPO should provide recommendations for performance improvement as necessary

				<i>Category : SUBSTANTIVE</i>
759	109	The NPPO should <del>normally</del> grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met.	P	<b>Viet Nam</b> The entities should be authorized if the entities meet the NPPO's requirements for authorization of entities <i>Category : SUBSTANTIVE</i>
760	109	<del>The</del> <u>If an NPPO considers the authorization of an entity, the NPPO</u> should normally grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met.	P	<b>European Union</b> To make clear that it is first of all up to the NPPO whether they would like to consider authorization of an entity. <i>Category : SUBSTANTIVE</i>
761	109	The NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met. <u>The NPPO may grant a temporary authorization, e.g. if the NPPO (or its authorized entity) needs to assess the entity during the realization of specific phytosanitary actions.</u>	P	<b>European Union</b> Such a provisional authorization may be useful in some cases, because without any authorization the entity would not be allowed to perform some tasks. <i>Category : SUBSTANTIVE</i>
762	109	The NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO ( <del>or its authorized entity</del> ) demonstrates that the NPPO's requirements for authorization of entities have been met.	P	<b>European Union</b> There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i>
763	109	<del>The</del> <u>If an NPPO considers the authorization of an entity, the NPPO</u> should normally grant authorization to the entity if the system audit conducted by the NPPO ( <del>or its authorized entity</del> ) demonstrates that the NPPO's requirements for authorization of entities have been met. <u>The NPPO may grant a temporary authorization, e.g. if the NPPO (or its authorized entity) needs to assess the entity during the realization of specific phytosanitary actions.</u>	P	<b>EPPO</b> Such a provisional authorization may be useful in some cases, because without any authorization the entity would not be allowed to perform some tasks.  There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context".  To make clear that it is first of all up to the NPPO whether they would like to consider authorization of an entity. <i>Category : SUBSTANTIVE</i>
764	109	The NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO ( <del>or its authorized entity</del> ) demonstrates that the NPPO's requirements for authorization of entities have been met.	P	<b>IPPC Regional Workshop Central Asia &amp; Central Europe</b> In line with the deletion of section 3.2.1. <i>Category : EDITORIAL</i>
765	109	The NPPO should <del>normally</del> grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met.	P	<b>Japan</b> The entities should be authorized if the entities meet the NPPO's requirements for authorization of entities. <i>Category : SUBSTANTIVE</i>

766	109	The NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO ( <del>or its authorized entity</del> ) demonstrates that the NPPO's requirements for authorization of entities have been met.	P	<b>China</b> The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i>
767	109	The NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO ( <del>or its authorized entity</del> ) demonstrates that the NPPO's requirements for authorization of entities have been met.	P	<b>APPPC</b> (44) China (3 Sep 2018 10:23 AM) The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i>
768	109	The NPPO should <b>normally</b> grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met.	P	<b>APPPC</b> (141) Japan (9 Sep 2018 10:33 AM) The entities should be authorized if the entities meet the NPPO's requirements for authorization of entities. <i>Category : SUBSTANTIVE</i>
769	109	The NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met.  <u>It may be understood that the NPPO should not grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) does not demonstrate that the NPPO's requirements for authorization of entities have been met. But in any case this should be indicated and the results communicated to the applying entity.</u>	P	<b>IPPC Regional Workshop Africa</b> <i>Category : SUBSTANTIVE</i>
770	109	The NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met.  <u>The outcomes of an audit could also lead for a rejection. So it appears logical to say some thing under such a situation.</u>	P	<b>Eritrea</b> <i>Category : SUBSTANTIVE</i>
771	109	<del>La ONPF debería normalmente otorgar autorización a la entidad si la auditoría del sistema realizada por la ONPF (o por la entidad autorizada por esta) demuestra el cumplimiento de los requisitos de la ONPF para la autorización de entidades.</del>	P	<b>OIRSA</b> Eliminar para ser consistente con todo el cuerpo de la norma <i>Category : SUBSTANTIVE</i>
772	109	<del>La ONPF debería normalmente otorgar autorización a la entidad si la auditoría del sistema realizada por la ONPF (o por la entidad autorizada por esta) demuestra el cumplimiento de los requisitos de la ONPF para la autorización de entidades.</del>	P	<b>Costa Rica</b> Se traslada como párrafo 108 <i>Category : EDITORIAL</i>

4.2 Audits to maintain authorization			
773	110	<b>4.5.2 Audits to maintain authorization</b>	P <b>APPPC</b> 74) Thailand (5 Sep 2018 12:31 PM) re-numbering <i>Category : EDITORIAL</i>
774	110	<b>4.5.2 Audits to maintain authorization</b>	P <b>Thailand</b> re-numbering <i>Category : EDITORIAL</i>
775	110	<b>4.2 Auditorías para mantener la autorización</b>	C <b>OIRSA</b> LA FISCALIZACIÓN REGULAR Y EXTRAORDINARIA <i>Category : TECHNICAL</i>
776	111	The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of risk and complexity associated with the phytosanitary actions, the performance and the conformance of the <u>authorized</u> entity.	P <b>Canada</b> To provide clarity. <i>Category : TECHNICAL</i>
777	111	The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of <del>risk and</del> <u>risk and</u> complexity associated with the phytosanitary actions, the performance and the conformance of the entity.	P <b>Canada</b> <i>Category : EDITORIAL</i>
778	111	The NPPO should determine the <del>ongoing</del> frequency of the audits to maintain authorization, based on the level of <del>risk and</del> <u>risk and</u> complexity associated with the phytosanitary actions, the performance and the conformance of the <del>entity</del> <u>entity (e.g. once a year)</u> .	P <b>Japan</b> Delete the "ongoing" because it is not necessary. The frequency of the audits should be decided based on the level of risk and complexity associated with the phytosanitary actions, the performance and the conformance of the entity. The interval between the audits (i.e. frequency) can be extended on the basis of the level of risk and complexity and the results of the previous audits (e.g. once every few years). <i>Category : SUBSTANTIVE</i>
779	111	The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of <del>risk and</del> <u>risk and</u> complexity associated with the <del>phytosanitary</del> <u>Phytosanitary</u> actions, the performance and the conformance of the entity.	P <b>Ghana</b> <i>Category : EDITORIAL</i>
780	111	The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of risk and complexity associated with the phytosanitary actions, the performance and the conformance of the entity.	C <b>PPPO</b> clarification needed on this paragraph <i>Category : SUBSTANTIVE</i>
781	111	The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of <del>risk and</del> <u>risk and</u> complexity associated with the phytosanitary actions, the performance and the conformance of the entity.	P <b>Caribbean Agricultural Health and Food Safety Agency</b> <i>Category : EDITORIAL</i>
782	111	The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of <del>risk and</del> <u>risk, scope and</u> complexity associated with the phytosanitary actions, <del>and</del> the performance and <del>the</del> conformance of the entity.	P <b>New Zealand</b> Length of a season, range of actions carried out etc. should also influence audit frequency. Complexity can be limited to the complexity of one task - not the variety of tasks. <i>Category : TECHNICAL</i>

783	111	The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of <del>risk and risk, scope and</del> complexity associated with the phytosanitary actions, <del>and</del> the performance and <del>the</del> conformance of the entity.	P	<b>APPPC</b> 109) New Zealand (7 Sep 2018 6:47 AM) Length of a season, range of actions carried out etc. should also influence audit frequency. Complexity can be limited to the complexity of one task - not the variety of tasks. <i>Category : TECHNICAL</i>
784	111	The NPPO should determine the <del>ongoing</del> frequency of the audits to maintain authorization, based on the level of <del>risk and</del> complexity associated with the phytosanitary actions, the performance and the conformance of the entity.	P	<b>APPPC</b> (138) Japan (9 Sep 2018 12:54 AM) "ongoing" is not necessary. <i>Category : SUBSTANTIVE</i>
785	111	The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of <del>risk and risk and</del> complexity associated with the phytosanitary actions, the performance and the conformance of the entity.	P	<b>APPPC</b> 169) Philippines (12 Sep 2018 3:32 AM) 10) Nepal (9 Aug 2018 5:20 PM) <i>Category : EDITORIAL</i>
786	111	The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of <del>risk and risk and</del> complexity associated with the phytosanitary actions, the performance and the conformance of the entity.	P	<b>Philippines</b> <i>Category : EDITORIAL</i>
787	111	The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of <del>risk and phytosanitary risk and</del> complexity associated with the phytosanitary actions, the performance and the conformance of the entity.	P	<b>Costa Rica</b> To clarify, at the time of performing the audit, other risks that are not the responsibility of the NPPO are not included. <i>Category : TECHNICAL</i>
788	111	The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of <del>risk and risk and</del> complexity associated with the phytosanitary actions, <del>the</del> performance and the conformance of the entity.	P	<b>NEPPO</b> <i>Category : EDITORIAL</i>
789	111	The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of <del>risk and risk and</del> complexity associated with the phytosanitary actions, <del>the</del> performance and the conformance of the entity.	P	<b>Singapore</b> <i>Category : EDITORIAL</i>
790	111	La ONPF debería determinar la frecuencia con la que han de realizarse auditorías para mantener la autorización, teniendo en cuenta el nivel de riesgo <del>fitosanitario</del> y la complejidad que conllevan las acciones fitosanitarias, así como el rendimiento y la conformidad de la entidad.	P	<b>OIRSA</b> Para clarificar términos <i>Category : EDITORIAL</i>
791	112	Audits to maintain authorization should be conducted at least once a year on the entity's entire system. Additional audits on <del>a specific part or</del> parts of the entity's system may be conducted as necessary.	P	<b>European Union</b> Better wording. <i>Category : EDITORIAL</i>
792	112	Audits to maintain authorization should be conducted <del>at least once a year on regular basis and the entity's entire system</del> frequency should be based on the results of previous audits. <del>If necessary audits should be conducted yearly.</del> Additional audits on a specific part or parts of the entity's system may be conducted as necessary.	P	<b>European Union</b> Audit on the entity's entire system on a yearly basis may be considered too frequent in some circumstances and not frequent enough in other cases. <i>Category : SUBSTANTIVE</i>

793	112	Audits to maintain authorization should be conducted <del>at least once a year on regular basis and the entity's entire system</del> <u>frequency should be based on the results of previous audits. If necessary audits can be yearly conducted.</u> Additional audits on a specific <del>part or</del> parts of the entity's system may be conducted as necessary.	P	<b>EPPO</b> Audit on the entity's entire system on a yearly basis may be considered too frequent in some circumstances and not frequent enough in other cases.  Better wording <i>Category : EDITORIAL</i>
794	112	<del>Audits to maintain authorization should be conducted at least once a year on the entity's entire system.</del> Additional audits on a specific part or parts of the entity's system may be conducted as necessary.	P	<b>Japan</b> The frequency of the audits should be decided based on the level of risk and complexity associated with the phytosanitary actions, the performance and the conformance of the entity. The interval between the audits (i.e. frequency) can be extended on the basis of the level of risk and complexity and the results of the previous audits (e.g. once every few years). <i>Category : SUBSTANTIVE</i>
795	112	Audits to maintain authorization should be conducted at least once a year <u>depending on compliance on</u> the entity's entire system. Additional audits on a specific part or parts of the entity's system may be conducted as necessary.	P	<b>PPPO</b> add depending on compliance <i>Category : TECHNICAL</i>
796	112	Audits to maintain authorization should be conducted at least once a year on the entity's entire system. Additional audits on a specific part or parts of the entity's system may be conducted as necessary.	C	<b>PPPO</b> clarification of this paragraph <i>Category : SUBSTANTIVE</i>
797	112	Audits to maintain authorization should be conducted <del>at least once a year on the entity's entire system. Additional audits on a specific part or parts of the entity's system may be conducted,</del> as <del>necessary</del> <u>necessary and as documented in the arrangement.</u>	P	<b>United States of America</b> NPPO and the third party should decide how often the audit should occur to remain compliant and authorized to meet NPPO's requirements <i>Category : SUBSTANTIVE</i>
798	112	Audits <del>(announced or unannounced)</del> to maintain authorization should be conducted at least once a year on the entity's entire <del>systems</del> <u>system (system audit)</u> .  Additional audits on a specific part or parts of the entity's system <u>(surveillance audit)</u> may be conducted <u>at an appropriate time</u> as <u>frequent as</u> necessary.	P	<b>New Zealand</b> In seasonal industries timeliness of audits is very important.  Suggest to make the sentence "Additional audits on a specific part or parts of the entity's system may be conducted at appropriate times as necessary." a separate paragraph, as this is about a different type of the audit (audit of a specific part of the system) from the system audit (audit of the entire system) discussed in the first sentence.  <i>Category : SUBSTANTIVE</i>
799	112	Audits to maintain authorization should be conducted at least once a year on the entity's entire system. Additional audits on a specific part or parts of the entity's system may be conducted as necessary.	P	<b>APPPC</b> (86) Singapore (5 Sep 2018 12:52 PM) Additional paragraph to emphasise the need for an audit to verify the implementation of corrective actions as part of the authorisation process.  <i>Category : SUBSTANTIVE</i>

		<u>Audits should be conducted to evaluate the implementation and efficacy of corrective action(s) agreed between the NPPO ( or entity authorised to audit or supervise) and the authorised entity following a detection of non-conformity.</u>		
800	112	Audits to maintain authorization <del>should</del> <u>may</u> be conducted at least once a year on the entity’s entire system. Additional audits on a specific part or parts of the entity’s system may be conducted as necessary.	P	<b>APPPC</b> (134) Japan (8 Sep 2018 2:02 AM) To comply with paragraph 111. Frequency of the audits should be determined based on the level of risk and complexity associated with the phytosanitary actions.  <i>Category : SUBSTANTIVE</i>
801	112	Audits to maintain authorization should be conducted at least once a year on the entity’s entire system. Additional audits ( <u>announced or unannounced</u> ) on a specific part or parts of the entity’s system may be conducted <u>at appropriate times</u> as necessary.	P	<b>APPPC</b> (110) New Zealand (7 Sep 2018 6:48 AM) In seasonal industries timeliness of audits is very important.  Suggest to make the sentence "Additional audits on a specific part or parts of the entity’s system may be conducted at appropriate times as necessary." a separate paragraph, as this is about a different type of the audit (audit of a specific part of the system) from the system audit (audit of the entire system) discussed in the first sentence.  <i>Category : TECHNICAL</i>
802	112	Audits to maintain authorization should be conducted at least once a year on the entity’s entire system. Additional audits on a specific part or parts of the entity’s system may be conducted as necessary.	C	<b>Ukraine</b> Suggested version: Audits to maintain authorization should be conducted regularly; their frequency shall be based on the results of previous audits. If necessary, audits may be conducted once a year. Additional audits on a specific part or parts of the entity’s system may be conducted as necessary. Audits should be unbiased!!! <i>Category : SUBSTANTIVE</i>
803	112	Audits to maintain authorization should be conducted at least once a year on the entity’s entire system. Additional audits on a specific part or parts of the entity’s system may be conducted as necessary.  <u>Audits should be conducted to evaluate the implementation and efficacy of corrective action(s) agreed between the NPPO (or the entity authorised to audit or supervise) and the authorised entity following a detection of non-conformity.</u>	P	<b>Singapore</b> To emphasize the need for an audit to verify the implementation of corrective actions as part of the authorisation process. <i>Category : SUBSTANTIVE</i>
804	112	Audits to maintain authorization should be conducted at least once a year on the entity’s entire system. Additional audits on a specific part or parts of the entity’s system may be conducted as necessary.	C	<b>Mexico</b> It is very broad to perform audits every year to the entire system of the entity, it is proposed to establish, depending on the authorization period, audits of monitoring, monitoring and re-evaluation in the latter if it should be the entire system. <i>Category : SUBSTANTIVE</i>

805	112	A efectos de mantener la autorización deberían realizarse al menos una vez al año auditorías de todo el sistema de la <del>entidad</del> <u>entidad relacionado con las acciones fitosanitarias ejecutadas</u> . Podrán realizarse, según sea necesario, auditorías adicionales de una o varias partes específicas del sistema de la entidad.	P	<b>OIRSA</b> Responsabilidad ONPF Category : <i>TECHNICAL</i>
806	112	A efectos de mantener la autorización deberían realizarse al menos una vez al año auditorías de todo el sistema de la <del>entidad</del> <u>entidad relacionado con las acciones fitosanitarias ejecutadas</u> . Podrán realizarse, según sea necesario, auditorías adicionales de una o varias partes específicas del sistema de la entidad.	P	<b>Costa Rica</b> enmarcar solo la competencias de la CIPF Category : <i>EDITORIAL</i>
<b>5. Types of Nonconformity</b>				
807	113	<b>5. Types of <del>Nonconformity</del><u>Non-conformity</u></b>	P	<b>Japan</b>  Category : <i>EDITORIAL</i>
808	113	<b>56. Types of Nonconformity</b>	P	<b>APPPC</b> (75) Thailand (5 Sep 2018 12:31 PM) re-numbering  Category : <i>EDITORIAL</i>
809	113	<b>5. Types of Nonconformity</b>	C	<b>APPPC</b> (131) New Zealand (7 Sep 2018 8:00 AM) For discussion and consideration. Does this standard need to be so specific in addressing categorisation of non-conformities by NPPOs? If NPPOs have already developed and are operating systems for categorising non-conformance. then the the categorisation of nonconformity would be unnecessary. The requirement could simply be that categorisation of non-compliance is transparent and manages risk to the satisfaction of trading partner's NPPO.  Category : <i>SUBSTANTIVE</i>
810	113	<b>56. Types of Nonconformity</b>	P	<b>Thailand</b> re-numbering Category : <i>EDITORIAL</i>
811	113	<b>5. Tipos de <del>no conformidad</del><u>incumplimiento</u></b>	P	<b>OIRSA</b> Mejor comprensión del párrafo Category : <i>TECHNICAL</i>
812	114	When the authorized entity does not meet the requirements specified by the <u>NPPONPPO or their own documented system</u> , this should be considered as a nonconformity.	P	<b>Viet Nam</b> Any authorized entity that dose not follow their own standard operating procedures or documented information/system should also be defined as nonconformity Category : <i>SUBSTANTIVE</i>
813	114	When the authorized entity does not meet the requirements specified by the NPPO, this should be considered as a <del>nonconformity</del> <u>non-conformity</u> .	P	<b>Japan</b>  Category : <i>EDITORIAL</i>

814	114	When the authorized entity does not meet the requirements specified by the <a href="#">NPPONPPO or their own documented system</a> , this should be considered as a nonconformity.	P	<b>APPPC</b> 160) APPPC (11 Sep 2018 9:44 AM) Any authorized entity that dose not follow their own standard operating procedures or documented information/system should also be defined as nonconformity. <i>Category : SUBSTANTIVE</i>
815	114	When the authorized entity does not meet the requirements specified by the <a href="#">NPPONPPO or their own documented information</a> , this should be considered as a nonconformity.	P	<b>Thailand</b> Any authorized entity that dose not follow their own standard operating procedures or documented information should also be defined as nonconformity. <i>Category : SUBSTANTIVE</i>
816	115	A nonconformity may be identified during audits, supervision, investigations, <a href="#">records from authorized entities</a> or through notification of non-compliance (ISPM 13 ( <i>Guidelines for the notification of non-compliance and emergency action</i> )).	P	<b>Japan</b> A nonconformity may be identified through records from authorized entities. This proposed change is supported by APPPC as well as by Japan. <i>Category : SUBSTANTIVE</i>
817	115	A nonconformity may be identified during audits, supervision, investigations, <a href="#">records from authorized entities</a> or through notification of non-compliance (ISPM 13 ( <i>Guidelines for the notification of non-compliance and emergency action</i> )).	P	<b>Viet Nam</b> A nonconformity may be identified through records from authorized entities <i>Category : SUBSTANTIVE</i>
818	115	A nonconformity may be identified during audits, supervision, investigations, <a href="#">records from authorized entities</a> , or through notification of non-compliance (ISPM 13 ( <i>Guidelines for the notification of non-compliance and emergency action</i> )).	P	<b>Korea, Republic of</b> A nonconformity may be identified through records from authorized entities. <i>Category : SUBSTANTIVE</i>
819	115	A nonconformity may be identified during audits, <del>supervision, supervision or</del> investigations, or through notification of non-compliance (ISPM 13 ( <i>Guidelines for the notification of non-compliance and emergency action</i> )).	P	<b>European Union</b> To better distinguish the case of notifications of non-compliance. <i>Category : EDITORIAL</i>
820	115	A nonconformity may be identified during audits, <del>supervision, supervision or</del> investigations, or through notification of non-compliance (ISPM 13 ( <i>Guidelines for the notification of non-compliance and emergency action</i> )).	P	<b>EPPO</b> To better distinguish the case of notifications of non-compliance. <i>Category : EDITORIAL</i>
821	115	A <del>noneonformity-non-conformity</del> may be identified during audits, supervision, investigations, or through notification of non-compliance (ISPM 13 ( <i>Guidelines for the notification of non-compliance and emergency action</i> )).	P	<b>Japan</b> <i>Category : EDITORIAL</i>
822	115	A nonconformity may be identified during audits, supervision, investigations, <a href="#">records from authorized entities</a> or through notification of non-compliance (ISPM 13 ( <i>Guidelines for the notification of non-compliance and emergency action</i> )).	P	<b>China</b> A non-conformity may be identified through records from authorized entities. <i>Category : SUBSTANTIVE</i>
823	115	A nonconformity may be identified during audits, supervision, investigations, <a href="#">records from authorized entities</a> or through notification of non-compliance	P	<b>APPPC</b> 76) Thailand (5 Sep 2018 12:32 PM) Any authorized entity that dose not follow their own standard operating procedures or documented information should also be

		(ISPM 13 ( <i>Guidelines for the notification of non-compliance and emergency action</i> )).		defined as nonconformity. <i>Category : SUBSTANTIVE</i>
824	115	A nonconformity may be identified during audits, supervision, <del>investigations,</del> or through notification of non-compliance (ISPM 13 ( <i>Guidelines for the notification of non-compliance and emergency action</i> )).	P	<b>Mexico</b> Deleted, as this concept is not very clear. <i>Category : TECHNICAL</i>
825	116	The type and number of nonconformities identified should be used by the NPPO to determine the ongoing status of the entity (authorized, suspended or revoked) and the subsequent audit frequency.	C	<b>European Union</b> The list of types of non conformities proposed for paragraph 121 could be further developed drawing on the list, for example in ISPM 36. <i>Category : SUBSTANTIVE</i>
826	116	The type and number of nonconformities identified should be used by the NPPO to determine the <del>ongoing</del> status of the entity (authorized, suspended or revoked) and the subsequent audit frequency.	P	<b>European Union</b> Confusing word (the entity will determine if the current status of the entity is still appropriate, and if not it will change it). <i>Category : EDITORIAL</i>
827	116	The type and number of nonconformities identified should be used by the NPPO to determine the ongoing status of the entity (authorized, suspended or revoked) and the subsequent audit frequency.	C	<b>EPPO</b> The list of types of non conformities proposed for paragraph 121 could be further developed drawing on the list, for example in ISPM 36. <i>Category : SUBSTANTIVE</i>
828	116	The type and number of nonconformities identified should be used by the NPPO to determine the <del>ongoing</del> status of the entity (authorized, suspended or revoked) and the subsequent audit frequency.	P	<b>EPPO</b> Confusing word (the entity will determine if the current status of the entity is still appropriate, and if not it will change it). <i>Category : EDITORIAL</i>
829	116	The type and number of <del>nonconformities-non-conformities</del> identified should be used by the NPPO to determine the ongoing status of the entity (authorized, suspended or revoked) and the subsequent audit frequency.	P	<b>Japan</b> <i>Category : EDITORIAL</i>
830	116	The type and number of nonconformities identified should be used by the NPPO to determine the ongoing status of the entity (authorized, suspended or revoked) and the <del>subsequent follow up</del> audit frequency.	P	<b>APPPC</b> 77) Thailand (5 Sep 2018 12:32 PM) The term "follow up audit" is more appropriate than the term "subsequent audit". <i>Category : EDITORIAL</i>
831	116	The type and number of nonconformities identified should be used by the NPPO to determine the ongoing status of the entity (authorized, suspended or revoked) and the <del>subsequent follow up</del> audit frequency.	P	<b>Thailand</b> The term "follow up audit" is more appropriate than the term "subsequent audit". <i>Category : EDITORIAL</i>
832	117	<del>Any nonconformity identified should result in-If a corrective action to be agreed between nonconformity is identified,</del> the NPPO <del>(or should require the entity authorized to audit or supervise) and the authorized entity being audited to take a corrective action.</del>	P	<b>European Union</b> It should be clear that the NPPO decides on the corrective actions, it still may be discussed with the entity but this is not a requirement in all cases. <i>Category : SUBSTANTIVE</i>
833	117	<del>Any nonconformity identified should result in-If a corrective action to be agreed between nonconformity is identified,</del> the NPPO <del>(or should require the entity</del>	P	<b>EPPO</b> It should be clear that the NPPO decides on the corrective actions, it still may be discussed with the entity but this is not a requirement in all cases.

		authorized <del>to audit or supervise</del> ) and the authorized entity being audited <u>to take a corrective action</u> .		<i>Category : SUBSTANTIVE</i>
834	117	Any nonconformity identified should result in a corrective action to be <u>preemptively</u> agreed between the NPPO (or the entity authorized to audit or supervise) and the authorized entity being audited.	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> <i>Category : SUBSTANTIVE</i>
835	117	Any <del>nonconformity-non-conformity</del> identified should result in a corrective action to be agreed between the NPPO (or the entity authorized to audit or supervise) and the authorized entity being audited.	P	<b>Japan</b> <i>Category : EDITORIAL</i>
836	117	Cualquier no conformidad detectada debería dar lugar a una acción correctiva que han de acordar la ONPF ( <del>o la entidad autorizada para auditar o supervisar</del> ) y la entidad autorizada que está siendo auditada.	P	<b>OIRSA</b> Este concepto no está contemplado en el ámbito de la norma. <i>Category : TECHNICAL</i>
837	118	<del>Noneonformities</del> <u>Non-conformities</u> may be considered as critical <del>noneonformities</del> <u>non-conformities</u> (section 5.1) or other <del>noneonformities-non-conformities</del> (section 5.2).	P	<b>Japan</b> <i>Category : EDITORIAL</i>
<b>5.1 Critical nonconformity</b>				
838	119	<b>5.1 Critical nonconformity</b>	C	<b>Mozambique</b> For consistence, please provide examples of critical nonconformity <i>Category : TECHNICAL</i>
839	119	<b>5.1 Critical <del>nonconformity</del>non-conformity</b>	P	<b>Japan</b> <i>Category : EDITORIAL</i>
840	119	<u>56.1</u> <b>Critical nonconformity</b>	P	<b>APPPC</b> (78) Thailand (5 Sep 2018 12:33 PM) re-numbering <i>Category : EDITORIAL</i>
841	119	<u>56.1</u> <b>Critical nonconformity</b>	P	<b>Thailand</b> re-numbering <i>Category : EDITORIAL</i>
842	119	<b>5.1 No conformidades <del>erueiales</del>críticas</b>	P	<b>OIRSA</b> Mejor comprensión del párrafo <i>Category : EDITORIAL</i>
843	119	<b>5.1 No conformidades <del>erueiales</del>críticas</b>	P	<b>Costa Rica</b> termino más utilizado <i>Category : EDITORIAL</i>
844	120	Critical nonconformity is nonconformity that immediately impacts the integrity <del>of and trust in</del> <u>of and trust in</u> the NPPO's phytosanitary system and that requires an immediate corrective <del>action</del> <u>action to</u> be identified and implemented.	P	<b>Grenada</b> <i>Category : EDITORIAL</i>
845	120	Critical <del>nonconformity-non-conformity</del> is nonconformity that immediately impacts the integrity <del>of and trust in</del> <u>of and trust in</u> the NPPO's phytosanitary system and that requires an immediate corrective <del>action</del> <u>action to</u> be identified and implemented.	P	<b>Japan</b> <i>Category : EDITORIAL</i>

846	120	Critical nonconformity is nonconformity that immediately impacts the integrity <del>of and trust in</del> <u>of and trust in</u> the NPPO's phytosanitary system and that requires an immediate corrective <del>action</del> <u>action to</u> be identified and implemented.	P	<b>Australia</b> <i>Category : EDITORIAL</i>
847	120	Critical nonconformity is nonconformity that immediately impacts the integrity <del>of and trust in</del> the NPPO's phytosanitary system and that requires an immediate corrective <del>action</del> to be identified and implemented.	C	<b>United States of America</b> The authorization programme should specify with examples what this critical nonconformities may be. <i>Category : SUBSTANTIVE</i>
848	120	Critical nonconformity is nonconformity that <del>immediately</del> impacts the integrity <del>of and trust in</del> <u>of and trust in</u> the NPPO's phytosanitary system and that requires <del>an immediate-a rapid</del> corrective <del>action</del> <u>action to</u> be identified and implemented.  <u>An entity can be suspended immediately from performing the authorized phytosanitary action if a critical nonconformance is identified, before the corrective actions have been implemented.</u>	P	<b>New Zealand</b> Immediacy of impact is irrelevant. Corrective actions may take time to be identified and implemented, hence the deletion of "immediate". It should also be recognised that an entity can be suspended immediately from performing the authorized phytosanitary action if a critical nonconformance is identified, before the corrective actions have been implemented. the meaning of this is different from the following para. <i>Category : SUBSTANTIVE</i>
849	120	Critical nonconformity is nonconformity that <del>immediately</del> impacts the integrity <del>of and trust in</del> <u>of and trust in</u> the NPPO's phytosanitary system and that requires <del>an immediate-a rapid</del> corrective <del>action</del> <u>action to</u> be identified and implemented.	P	<b>APPPC</b> (111) New Zealand (7 Sep 2018 6:54 AM) Immediacy of impact is irrelevant <i>Category : EDITORIAL</i>
850	120	Critical nonconformity is nonconformity that immediately impacts the integrity <del>of and trust in</del> <u>of and trust in</u> the NPPO's phytosanitary system and that requires an immediate corrective <del>action</del> <u>action to</u> be identified and implemented.	P	<b>APPPC</b> (170) Philippines (12 Sep 2018 3:32 AM) <i>Category : EDITORIAL</i>
851	120	Critical nonconformity is nonconformity that immediately impacts the integrity <del>of and trust in</del> the NPPO's phytosanitary system and that requires an immediate corrective <del>action</del> <u>action to</u> be identified and implemented.	P	<b>Philippines</b> <i>Category : EDITORIAL</i>
852	120	Critical nonconformity is nonconformity that immediately impacts the integrity <del>of and trust in</del> <u>of and trust in</u> the NPPO's phytosanitary system and that requires an immediate corrective <del>action</del> to be identified and implemented.	P	<b>Philippines</b> <i>Category : EDITORIAL</i>
853	120	Critical nonconformity is nonconformity that immediately impacts the integrity <del>of and of</del> <u>of and</u> trust in the NPPO's phytosanitary system and that requires an immediate corrective <del>action</del> <u>action to</u> be identified and implemented.	P	<b>NEPPO</b> <i>Category : EDITORIAL</i>
854	120	Critical nonconformity is nonconformity that immediately impacts the integrity <del>of and trust in</del> <u>of and trust in</u> the NPPO's phytosanitary system and that requires an immediate corrective <del>action</del> <u>action to</u> be identified and implemented.	P	<b>Singapore</b> <i>Category : EDITORIAL</i>
855	120	Critical nonconformity is <u>a</u> nonconformity that immediately impacts the integrity <del>of and trust in</del> the NPPO's phytosanitary system and that requires an immediate corrective <del>action</del> to be identified and implemented.	P	<b>Singapore</b> <i>Category : EDITORIAL</i>

856	121	If the authorized entity does <del>not immediately not immediately</del> implement the mutually agreed corrective action or the corrective <del>action is action is</del> not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be <del>suspended or suspended or</del> revoked by the NPPO.	P	<b>Canada</b>  <i>Category : EDITORIAL</i>
857	121	If the authorized entity does <del>not immediately not immediately</del> implement the mutually agreed corrective action or the corrective <del>action is actions</del> not implemented to the satisfaction of the <del>NPPO (or the entity authorized to audit or supervise) NPPO</del> , the authorization of the entity should be <del>suspended or suspended or</del> revoked by the NPPO.	P	<b>European Union</b> There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i>
858	121	If the authorized entity does <del>not immediately not immediately</del> implement the <del>mutually agreed</del> corrective action or the corrective <del>action is actions</del> not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be <del>suspended or suspended or</del> revoked by the NPPO.	P	<b>European Union</b> The NPPO is responsible for the corrective action needed, they may discuss this with the entity but the corrective action need not necessarily be mutually agreed. It is first of all the responsibility of the NPPO and need not necessarily be agreed mutually. <i>Category : SUBSTANTIVE</i>
859	121	If the authorized entity does <del>not immediately not immediately</del> implement the mutually agreed corrective action or the corrective <del>action is actions</del> not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be <del>suspended or suspended or</del> revoked by the NPPO. <u>This is the case when:</u> <u>a) there is evidence of failing to properly perform delegated actions;</u> <u>b) there is a failure to take appropriate and timely action to remedy the shortcomings identified; or</u> <u>c) the independence or impartiality of entity has been shown to be compromised.</u>	P	<b>European Union</b> Nonconformities should be identified. This short list might be replaced by a more elaborated list (see comment on para 116 with reference to ISPM 36).  <i>Category : SUBSTANTIVE</i>
860	121	If the authorized entity does <del>not immediately not immediately</del> implement the <del>mutually agreed</del> corrective action or the corrective <del>action is action is</del> not implemented to the satisfaction of the <del>NPPO (or the entity authorized to audit or supervise) NPPO</del> , the authorization of the entity should be <del>suspended or suspended or</del> revoked by the NPPO. <u>This is the case when:</u> <u>a) there is evidence of failing to properly perform delegated tasks;</u> <u>b) there is a failure to take appropriate and timely action to remedy the shortcomings identified; or</u> <u>c) the independence or impartiality of entity has been shown to be compromised.</u>	P	<b>EPPO</b> The NPPO is responsible for the corrective action needed, they may discuss this with the entity but the corrective action need not necessarily be mutually agreed.  Nonconformities should be identified. This short list might be replaced by a more elaborated list (see comment on para 116 with reference to ISPM 36).  There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i>
861	121	If the authorized entity does <del>not immediately not immediately</del> implement the mutually agreed corrective action or the corrective <del>action is action is</del> not	P	<b>Japan</b>

		implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be <del>suspended</del> <u>suspended or</u> revoked by the NPPO.		<i>Category : EDITORIAL</i>
862	121	If the authorized entity does not immediately implement the mutually agreed corrective action or the corrective action is not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be <del>suspended</del> or revoked by the NPPO.	C	<b>Australia</b> It would be useful to include a dispute resolution clause <i>Category : TECHNICAL</i>
863	121	If the authorized entity does not immediately implement the mutually agreed corrective action or the corrective action is not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be <del>suspended</del> or revoked by the NPPO.	C	<b>United States of America</b> Time frame should be specified in the agreement, immediate is not necessarily the thought after solution. <i>Category : TECHNICAL</i>
864	121	If the authorized entity does <del>not immediately</del> <u>not</u> implement the mutually agreed corrective action <u>within the timeframe specified in the arrangement</u> or the corrective <del>action is</del> <u>actions</u> not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be <del>suspended</del> <u>suspended or</u> revoked by the NPPO.	P	<b>United States of America</b>  <i>Category : TECHNICAL</i>
865	121	If the authorized entity does <del>not immediately</del> <u>not</u> implement the mutually agreed corrective action <u>within an agreed timeframe, which should be as rapid as possible.</u> or the corrective <del>action is</del> <u>action is</u> not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be <del>suspended</del> <u>suspended or</u> revoked by the NPPO.	P	<b>New Zealand</b> Immediate is "now" but corrective action normally takes a measure of time - to agree and implement. <i>Category : TECHNICAL</i>
866	121	If the authorized entity does <del>not immediately</del> <u>not</u> implement the mutually agreed corrective action or the corrective <del>action is</del> <u>action within an agreed time frame (which should be as rapid as possible) or the corrective action is</u> not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be <del>suspended</del> <u>suspended or</u> revoked by the NPPO.	P	<b>APPPC</b> (112) New Zealand (7 Sep 2018 6:57 AM) Immediate is "now" but corrective action normally takes a measure of time - to agree and implement.  <i>Category : EDITORIAL</i>
867	121	If the authorized entity does <del>not immediately</del> <u>not immediately</u> implement the mutually agreed corrective action or the corrective <del>action is</del> <u>action is</u> not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be <del>suspended</del> or revoked by the NPPO.	P	<b>Egypt</b>  <i>Category : EDITORIAL</i>
868	121	If the authorized entity does not immediately implement the mutually agreed corrective action or the corrective action is not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be <del>suspended</del> <u>suspended or</u> revoked by the NPPO.	P	<b>Egypt</b>  <i>Category : EDITORIAL</i>

869	121	If the authorized entity does <del>not immediately not immediately</del> implement the <del>mutually</del> -agreed corrective action or the corrective <del>action is action is</del> not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be <del>suspended or suspended or</del> revoked by the NPPO.	P	<b>Australia</b> The corrective action may not need to be mutually agreed. <i>Category : TECHNICAL</i>
870	121	If the authorized entity does <del>not immediately not immediately</del> implement the mutually agreed corrective action or the corrective <del>action is action is</del> not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be suspended or revoked by the NPPO.	P	<b>NEPPO</b> <i>Category : EDITORIAL</i>
871	121	If the authorized entity does <del>not immediately not immediately</del> implement the mutually agreed corrective action or the corrective <del>action is action is</del> not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be <del>suspended or suspended or</del> revoked by the NPPO.	P	<b>Singapore</b> <i>Category : EDITORIAL</i>
872	121	Si la entidad autorizada no ejecuta inmediatamente la acción correctiva mutuamente acordada o si la ONPF (o la entidad autorizada para auditar o supervisar) no considera satisfactoria la ejecución de la acción correctiva, la ONPF <del>debería debería</del> suspender o revocar la autorización de la entidad.	P	<b>OIRSA</b> Mejor comprensión del párrafo <i>Category : EDITORIAL</i>
<b>5.2 Other nonconformity</b>				
873	122	<b>5.2 Other nonconformity</b>	C	<b>Mozambique</b> For consistence, please provide examples of other nonconformity <i>Category : TECHNICAL</i>
874	122	<b>5.2 Other <del>nonconformity non-conformity</del></b>	P	<b>Japan</b> <i>Category : EDITORIAL</i>
875	122	<b><del>5.2</del> 5.2 Other nonconformity</b>	P	<b>APPPC</b> 79) Thailand (5 Sep 2018 12:33 PM) re-numbering <i>Category : EDITORIAL</i>
876	122	<b>5.2 Other <del>nonconformity Lesser nonconformity</del></b>	P	<b>IPPC Regional Workshop Africa</b> The word 'lesser' differentiates the severity of this type of nonconformity from 'Critical nonconformity' <i>Category : TECHNICAL</i>
877	122	<b><del>5.2</del> 5.2 Other nonconformity</b>	P	<b>Thailand</b> re-numbering <i>Category : EDITORIAL</i>
878	123	Other nonconformity <del>is nonconformity that does do</del> not directly or immediately impact the integrity of and trust in the NPPO's phytosanitary system but that will	P	<b>European Union</b> Improvement. <i>Category : EDITORIAL</i>

		need corrective actions to be taken within a timeframe specified by the NPPO (or the entity authorized to audit or supervise).		
879	123	Other nonconformity is nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO's phytosanitary system but that will need corrective actions to be taken within a timeframe specified by the NPPO (or the entity authorized to audit or supervise). <u>Suspension or revocation of the authorization is not needed but may be considered when repeatedly other nonconformities are identified or when corrective actions are not taken within the required timeframe.</u>	P	<b>European Union</b> To indicate that other nonconformities do not lead to suspension or revocation but when happening repeatedly or when corrective actions not taken this may be considered. <i>Category : SUBSTANTIVE</i>
880	123	Other nonconformity is nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO's phytosanitary system but that <del>will need</del> <u>requires</u> corrective actions to be taken within a timeframe specified by the NPPO (or the entity authorized to audit or supervise).	P	<b>European Union</b> More appropriate wording for an ISPM and consistency with paragraph 120. <i>Category : EDITORIAL</i>
881	123	Other nonconformity <del>is nonconformity that does do</del> not directly or immediately impact the integrity of and trust in the NPPO's phytosanitary system but <del>that will need</del> <u>requires</u> corrective actions to be taken within a timeframe specified by the NPPO (or the entity authorized to audit or supervise). <u>Suspension or revocation of the authorization is not needed but may be considered when repeatedly other nonconformities are identified or when corrective actions are not taken within the required timeframe.</u>	P	<b>EPPO</b> More appropriate wording for an ISPM and consistency with paragraph 120.  To indicate that other nonconformities do not lead to suspension or revocation but when happening repeatedly or when corrective actions not taken this may be considered.  Improvement <i>Category : EDITORIAL</i>
882	123	Other <del>nonconformity non-conformity</del> <u>is nonconformity non-conformity</u> that does not directly or immediately impact the integrity of and trust in the NPPO's phytosanitary system but that will need corrective actions to be taken within a timeframe specified by the NPPO (or the entity authorized to audit or supervise).	P	<b>Japan</b>  <i>Category : EDITORIAL</i>
883	123	Other nonconformity is nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO's phytosanitary system but that will need corrective actions to be taken within a timeframe specified by the NPPO (or the entity authorized to audit or supervise).	C	<b>United States of America</b> The authorization programme should specify with examples what other nonconformities may be. <i>Category : SUBSTANTIVE</i>
884	123	Other nonconformity is <u>a</u> nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO's phytosanitary system but that will need corrective actions to be taken within a timeframe specified by the NPPO (or the entity authorized to audit or supervise).	P	<b>APPPC</b> (87) Singapore (5 Sep 2018 12:53 PM) Missing " a"  <i>Category : EDITORIAL</i>
885	123	Other nonconformity is nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO's phytosanitary system but that will need corrective actions to be taken within a <del>timeframe</del> <u>time frame</u> specified by the NPPO (or the entity authorized to audit or supervise).	P	<b>IPPC Regional Workshop Africa</b>  <i>Category : EDITORIAL</i>

886	123	Other nonconformity is nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO’s phytosanitary system but that will need corrective actions to be taken within a timeframe specified by the NPPO (or the entity authorized to audit or supervise).	C	<b>IPPC Regional Workshop Africa</b> replace the term 'other nonconformity' with 'lesser nonconformity'. <i>Category : SUBSTANTIVE</i>
887	123	Other nonconformity is <u>a</u> nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO’s phytosanitary system but that will need corrective actions to be taken within a timeframe specified by the NPPO (or the entity authorized to audit or supervise).	P	<b>Singapore</b> inclusion of missing "a" for better sentence structure. <i>Category : EDITORIAL</i>
888	123	Se consideran otras no conformidades las que no afectan de forma directa o inmediata a la integridad y la confianza en el sistema fitosanitario de la ONPF, pero requerirán la ejecución de acciones correctivas en un plazo especificado por la ONPF (o la entidad autorizada para auditar o <del>supervisar</del> supervisar) y podrá <u>continuar operando únicamente bajo la supervisión directa de la ONPF (o de la entidad autorizada para auditar o supervisar) hasta que se subsane. En caso contrario. se consideraría como una no conformidad crítica.</u>	P	<b>OIRSA</b> Mejor comprensión del párrafo y aclarando responsabilidades de la ONPF <i>Category : TECHNICAL</i>
<b>6. Suspension,Revocation andReinstatement of Authorization</b>				
889	124	<b>6. Suspension, <del>Revocation and Reinstatement</del> and Reinstatement of Authorization</b>	P	<b>Ghana</b> <i>Category : EDITORIAL</i>
890	124	<b>6. Suspension,Revocation andReinstatement of Authorization</b>	C	<b>PPPO</b> the basis for revocation needs to be established. The understanding about suspension is immediate shut down of a system, however, this draft allows for operation to continue and suspension is only carried out if corrective actions are not implemented. <i>Category : TECHNICAL</i>
891	124	<b>6. Suspension,Revocation andReinstatement of Authorization</b>	C	<b>PPPO</b> add to each action, to communicate all decisions to relevant authorities. <i>Category : SUBSTANTIVE</i>
892	124	<b>6. Suspension,Revocation andReinstatement of Authorization</b>	C	<b>PPPO</b> add in each action, that each decision is communicated to other NPPOs <i>Category : SUBSTANTIVE</i>
893	124	<b>6. Suspension, <del>Revocation and Reinstatement</del> and Reinstatement of Authorization</b>  <u>In the context of this standard, three types of authorization status change are as follows.</u>	P	<b>Japan</b> Add an explanation of authorization status. <i>Category : SUBSTANTIVE</i>
894	124	<b>6. Suspension,Revocation andReinstatement of Authorization</b>	C	<b>United States of America</b> Needs a paragraph or opening statement to specify that "An authorized entity may or may not operate when their

				authorization is under the specific status below". Could include "pending" and "active" authorization status to cover the full spectrum of possible status. <i>Category : SUBSTANTIVE</i>
895	124	<b>67. Suspension, Revocation and Reinstatement of Authorization</b>	P	<b>APPPC</b> (80) Thailand (5 Sep 2018 12:33 PM) re-numbering  <i>Category : EDITORIAL</i>
896	124	<b>6. Suspension, Revocation and Reinstatement of Authorization</b> <u>In the context of this standard, three types of authorization status change are as follows.</u>	P	<b>APPPC</b> (136) Japan (8 Sep 2018 5:03 PM) Add an explanation of authorization status  <i>Category : SUBSTANTIVE</i>
897	124	<b>6. Suspension, Revocation and Reinstatement of Authorization</b>	P	<b>APPPC</b> 171) Philippines (12 Sep 2018 3:32 AM) 113) New Zealand (7 Sep 2018 6:59 AM) <i>Category : EDITORIAL</i>
898	124	<b>6. Suspension, Revocation and Reinstatement of Authorization</b>	C	<b>Jamaica</b> Consider the use of the word "Probation" as per the definition for Suspension  "Suspension" – An entity whose authorization has been temporarily discontinued for a specified time to effect corrective action.  <i>Category : SUBSTANTIVE</i>
899	124	<b>6. Suspension, Revocation and Reinstatement of Authorization</b>	P	<b>Philippines</b>  <i>Category : EDITORIAL</i>
900	124	<b>6. Suspension, Revocation and Reinstatement of Authorization</b>	P	<b>NEPPO</b>  <i>Category : EDITORIAL</i>
901	124	<b>6. Suspension, Revocation and Reinstatement of Authorization</b>	C	<b>Montenegro</b> wording in point 5 paragraph 3 <i>Category : EDITORIAL</i>
902	124	<b>67. Suspension, Revocation and Reinstatement of Authorization</b>	P	<b>Thailand</b> re-numbering <i>Category : EDITORIAL</i>
903	124	<b>6. <u>Medidas para la atención de las no conformidades críticas</u> <del>Suspensión, revocación y restablecimiento de la autorización</del></b>	P	<b>OIRSA</b> Usó términos correctos <i>Category : TECHNICAL</i>
904	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise).	P	<b>Canada</b>  <i>Category : EDITORIAL</i>

905	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only <u>after corrective actions were taken</u> under the direct supervision of the NPPO (or the entity authorized to audit or supervise).	P	<b>Panama</b> To clarify the concept of suspension.  <i>Category : TECHNICAL</i>
906	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or <del>supervise</del> ) <u>supervise</u> as far as these phytosanitary actions are not prohibited.	P	<b>European Union</b> This is to make clear that a legal entity whose powers are suspended may continue the activities that are not prohibited. <i>Category : SUBSTANTIVE</i>
907	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or <del>supervise</del> ) <u>supervise</u> as far as these phytosanitary actions are not prohibited.	P	<b>EPPO</b> This is to make clear that a legal entity whose powers are suspended may continue the activities that are not prohibited. <i>Category : SUBSTANTIVE</i>
908	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise).	P	<b>Ghana</b>  <i>Category : EDITORIAL</i>
909	125	<b>Suspension.</b> An entity whose authorization is suspended <del>may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise)</del> <u>shall cease operation.</u>	P	<b>PPPO</b> replace..." may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise)" with... 'shall cease operation' <i>Category : TECHNICAL</i>
910	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only <u>after corrective actions are undertaken</u> under the direct supervision of the NPPO (or the entity authorized <u>by the NPPO</u> to audit or supervise).	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> For clarity <i>Category : SUBSTANTIVE</i>
911	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise). <u>Must only resume after corrective measures have been put in place.</u>	P	<b>Mozambique</b> For rigorousness of authorized entities consider to add the requirements to resume <i>Category : TECHNICAL</i>
912	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise).	P	<b>Japan</b>  <i>Category : EDITORIAL</i>
913	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise).	C	<b>Australia</b> Clarification required on how an Authorized entity can still carry out phytosanitary actions while suspended. An Entity can not perform actions under the Authorisation until the suspension is lifted, although there may be exceptions. During this time the entity can continue to operate in a normal capacity, however, they will not be considered an Authorised entity. Once corrective actions have taken place the authorisation can be reinstated. <i>Category : TECHNICAL</i>
914	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only under the direct <u>(i.e. line of sight)</u> supervision of the NPPO (or the entity authorized to audit or supervise).	P	<b>New Zealand</b>  <i>Category : EDITORIAL</i>

915	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only under the direct ( <u>i.e. line of sight</u> ) supervision of the NPPO (or the entity authorized to audit or supervise).	P	<b>APPPC</b> (132) New Zealand (7 Sep 2018 8:05 AM) Category : <i>EDITORIAL</i>
916	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise).	P	<b>APPPC</b> (172) Philippines (12 Sep 2018 3:33 AM) Category : <i>EDITORIAL</i>
917	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise).	C	<b>Jamaica</b> Suspension. An entity whose authorization is suspended may continue to operate only after corrective actions are undertaken and under the direct supervision of the NPPO (or the entity authorized to audit or supervise). Category : <i>SUBSTANTIVE</i>
918	125	<del>Suspension.</del> <b>Suspension -</b> An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise).	P	<b>IPPC Regional Workshop Africa</b>  Category : <i>EDITORIAL</i>
919	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only <u>after corrective actions were taken</u> under the direct supervision of the NPPO (or the entity authorized to audit or supervise).	P	<b>Costa Rica</b> To clarify the concept of suspension. Category : <i>TECHNICAL</i>
920	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise).	C	<b>Ukraine</b> Suggested version: An entity whose authorization is suspended may continue to operate only in actions that have not been forbidden as a result of audit. Category : <i>SUBSTANTIVE</i>
921	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise).	P	<b>Singapore</b> To include a missing space. Category : <i>EDITORIAL</i>
922	125	<del>Suspension. An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise).</del> <u>Suspensión temporal: Cuando se suspenda la autorización de una entidad, esta podrá continuar operando únicamente bajo la supervisión directa de la ONPF (o de la entidad autorizada para auditar o supervisar).</u>  <u>Se agregó temporal para aclarar esta definición faltaría definir suspensión indefinida.</u>	P	<b>Nicaragua</b> Suspensión. Cuando se suspenda la autorización de una entidad, esta podrá continuar operando únicamente bajo la supervisión directa de la ONPF (o de la entidad autorizada para auditar o supervisar). Category : <i>SUBSTANTIVE</i>
923	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only <u>after corrective actions were taken</u> under the direct supervision of the NPPO (or the entity authorized to audit or supervise).	P	<b>Argentina</b> To clarify the concept of suspension. Category : <i>TECHNICAL</i>

924	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only <u>after corrective actions were taken</u> under the direct supervision of the NPPO (or the entity authorized to audit or supervise).	P	<b>Uruguay</b> To clarify the concept of suspension <i>Category : TECHNICAL</i>
925	125	<b>Suspension.</b> An entity whose authorization is suspended may continue to operate only <u>after corrective actions were taken</u> under the direct supervision of the NPPO (or the entity authorized to audit or supervise).	P	<b>COSAVE</b> To clarify the concept of suspension. <i>Category : TECHNICAL</i>
926	125	<del><b>Suspensión</b></del> <b>Suspensión Temporal.</b> Cuando se suspenda la autorización de una entidad, esta podrá continuar operando únicamente bajo la supervisión directa de la ONPF (o de la entidad autorizada para auditar o supervisar).	P	<b>OIRSA</b> Se agregó temporal para aclarar esta definición faltaría definir suspensión indefinida. <i>Category : TECHNICAL</i>
927	125	<b>Suspensión.</b> Cuando se suspenda la autorización de una entidad, esta podrá continuar operando únicamente bajo la supervisión directa de la ONPF (o de la entidad autorizada para auditar o supervisar).	C	<b>OIRSA</b> Se recomienda que este término sea evaluado ya que una entidad no puede contar con una suspensión y seguir trabajando. Suspensión. Cuando se suspenda la autorización de una entidad, esta no podrá continuar operando hasta que solvente las observaciones realizadas.  <i>Category : TECHNICAL</i>
928	125	<b>Suspensión.</b> Cuando se suspenda la autorización de una entidad, esta <del>podrá continuar operando únicamente bajo la supervisión directa</del> <u>deberá subsanar las no conformidades dentro de la ONPF (o de la entidad autorizada para auditar o supervisar) un tiempo definido</u>	P	<b>OIRSA</b> uso correctos de términos <i>Category : TECHNICAL</i>
929	125	<b>Suspensión.</b> Cuando se suspenda la autorización de una entidad, esta podrá continuar operando únicamente bajo la supervisión directa de la ONPF (o de la entidad autorizada para auditar o supervisar).	C	<b>Colombia</b> Presentar una definición del término permitirá aclarar que acciones se deben realizar. Lo anterior teniendo en cuenta que de la forma en que actualmente está planteada no evidencia ningún cambio en la operación normal, debido que la auditoria es algo que siempre se da. <i>Category : SUBSTANTIVE</i>
930	125	<del><b>Suspensión</b></del> <b>Suspensión temporal.</b> Cuando se suspenda la autorización de una entidad, esta podrá continuar operando únicamente bajo la supervisión directa de la ONPF (o de la entidad autorizada para auditar o supervisar).	P	<b>Nicaragua</b> Suspensión temporal: Cuando se suspenda la autorización de una entidad, esta podrá continuar operando únicamente bajo la supervisión directa de la ONPF (o de la entidad autorizada para auditar o supervisar).  Se agregó temporal para aclarar esta definición faltaría definir suspensión indefinida. <i>Category : SUBSTANTIVE</i>
931	126	<b>Revocation.</b> An entity whose authorization is revoked should no longer <u>have its perform</u> phytosanitary actions <u>recognized by on behalf of</u> the <u>authorizing NPPO within the NPPO's phytosanitary system</u> NPPO.	P	<b>European Union</b> For clarity. <i>Category : EDITORIAL</i>
932	126	<b>Revocation.</b> An entity whose authorization is revoked should no longer <u>have its perform</u> phytosanitary actions <u>recognized by on behalf of</u> the <u>authorizing NPPO within the NPPO's phytosanitary system</u> NPPO.	P	<b>EPPO</b> For clarity. <i>Category : EDITORIAL</i>

933	126	<b>Revocation.</b> An entity whose authorization is revoked should no longer have its phytosanitary actions recognized by the authorizing NPPO within the NPPO's <del>phytosanitary</del> -Phytosanitary system.	P	<b>Ghana</b> <i>Category : EDITORIAL</i>
934	126	<b>Revocation.</b> An entity whose authorization is revoked should no longer have its phytosanitary actions recognized by the authorizing NPPO within the NPPO's phytosanitary system.	C	<b>Jamaica</b> Only critical non conformities should result in revocation. <i>Category : SUBSTANTIVE</i>
935	126	<del>Revocation.</del> <b>Revocation -</b> An entity whose authorization is revoked should no longer have its phytosanitary actions recognized by the authorizing NPPO within the NPPO's phytosanitary system.	P	<b>IPPC Regional Workshop Africa</b> <i>Category : EDITORIAL</i>
936	126	<b>Revocation.</b> An entity whose authorization is revoked should no longer have its phytosanitary actions recognized by the authorizing NPPO within the NPPO's phytosanitary system.	C	<b>Ukraine</b> We believe the standard has to define more specific conditions and timeframe under which an NPPO may suspend, revoke, reinstate or issue authorizations. <i>Category : SUBSTANTIVE</i>
937	126	<b>Revocación.</b> Cuando se revoque la autorización de una entidad, la ONPF que concedió la autorización <del>debería</del> -deberá dejar de reconocer las acciones fitosanitarias de la entidad en el marco del sistema fitosanitario de la ONPF.	P	<b>OIRSA</b> Mejor comprensión del párrafo <i>Category : EDITORIAL</i>
938	127	<b>Reinstatement.</b> An entity whose authorization has been suspended or <del>revoked</del> and <del>revoked</del> and that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement.	P	<b>Canada</b> <i>Category : EDITORIAL</i>
939	127	<b>Reinstatement.</b> An entity whose authorization has been suspended or <del>revoked</del> and <del>and</del> that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement, <del>only</del> <del>after corrective actions were taken.</del>	P	<b>Panama</b> Created by merging other changes together <i>Category : TECHNICAL</i>
940	127	<b>Reinstatement.</b> An entity whose authorization has been suspended or <del>revoked</del> and <del>revoked</del> and that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement.	P	<b>European Union</b> The details very much depend on the type and numbers of non-conformities. An appendix with examples as in ISPM 36 would help. <i>Category : SUBSTANTIVE</i>
941	127	<b>Reinstatement.</b> An entity whose authorization has been suspended or <del>revoked</del> and <del>revoked</del> and that wishes to have its authorization <del>status</del> reinstated should apply to the NPPO for reinstatement.	P	<b>European Union</b> Useless word. <i>Category : EDITORIAL</i>
942	127	<b>Reinstatement.</b> An entity whose authorization has been suspended or <del>revoked</del> and that wishes to have its authorization <del>status</del> reinstated should apply to the NPPO for reinstatement.	P	<b>EPPO</b> Useless word <i>Category : EDITORIAL</i>
943	127	<b>Reinstatement.</b> An entity whose authorization has been suspended or <del>revoked</del> and that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement.	C	<b>EPPO</b> The details very much depend on the type and numbers of non-conformities. An appendix with examples as in ISPM 36 would help. <i>Category : SUBSTANTIVE</i>

944	127	<b>Reinstatement.</b> An entity whose authorization has been suspended or <del>revokedand</del> <del>revoked and</del> that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement.	P	<b>Ghana</b> <i>Category : EDITORIAL</i>
945	127	<b>Reinstatement.</b> An entity whose authorization has been suspended or revokedand that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement.  <u>An entity whose institution is revoked can resume operation only when the NPPO has undertaken an audit, is content with the corrective actions taken and has lifted the suspension</u>	P	<b>PPPO</b> add 127b <i>Category : SUBSTANTIVE</i>
946	127	<b>Reinstatement.</b> An entity whose authorization has been suspended <del>or revokedand</del> <del>and</del> that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. <del>-. If an entity is suspended more that twice for critical non-conformities, its authorization is considered revoked.</del>	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> <i>Category : SUBSTANTIVE</i>
947	127	<b>Reinstatement.</b> An entity whose authorization has been suspended or <del>revokedand</del> <del>revoked and</del> that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement.	P	<b>Japan</b> <i>Category : EDITORIAL</i>
948	127	<b>Reinstatement.</b> An entity whose authorization has been suspended or revokedand that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement.	C	<b>Jamaica</b> A section on the criteria for reinstatement should be included in this document.  Entities that were previously revoked and are interested in being reinstated must be treated as a new applicant.  Include Reinstatement for Suspension . Entities that were suspended or put on probation by the NPPO, should only be reinstated once the corrective actions are verified and validated without the need for reapplication.  <i>Category : SUBSTANTIVE</i>
949	127	<b>Reinstatement.</b> An entity whose authorization has been suspended or <del>revokedand</del> <del>revoked and</del> that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement.	P	<b>APPPC</b> (173) Philippines (12 Sep 2018 3:33 AM) 115) New Zealand (7 Sep 2018 7:00 AM) <i>Category : EDITORIAL</i>
950	127	<b>Reinstatement.</b> An entity whose authorization has been suspended <del>or revokedand</del> <del>and</del> that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. <del>-, only after corrective actions were taken</del>	P	<b>Costa Rica</b> According to description of revocation in paragraph 126 we conclude that revocation is definitive, therefore the entity could not apply for reinstatement. The entity could be reinstated only if it was suspended.  <i>Category : TECHNICAL</i>

951	127	<b>Reinstatement.</b> An entity whose authorization has been suspended or <del>revoked and</del> <del>revoked and</del> that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement.	P	<b>NEPPO</b> <i>Category : EDITORIAL</i>
952	127	<b>Reinstatement.</b> An entity whose authorization has been suspended or <del>revoked and</del> <del>and</del> that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement.	P	<b>Argentina</b> According to description of revocation in paragraph 126 we conclude that revocation is definitive, therefore the entity could not apply for reinstatement. The entity could be reinstated only if it was suspended. <i>Category : TECHNICAL</i>
953	127	<b>Reinstatement.</b> An entity whose authorization has been suspended or <del>revoked and</del> <del>and</del> that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement.	P	<b>Uruguay</b> According to description of revocation in paragraph 126 we conclude that revocation is definitive, therefore the entity could not apply for reinstatement. The entity could be reinstated only if it was suspended. <i>Category : TECHNICAL</i>
954	127	<b>Reinstatement.</b> An entity whose authorization has been suspended or <del>revoked and</del> <del>and</del> that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement.	P	<b>COSAVE</b> According to description of revocation in paragraph 126 we conclude that revocation is definitive, therefore the entity could not apply for reinstatement. The entity could be reinstated only if it was suspended. <i>Category : TECHNICAL</i>
955	127	<b>Restablecimiento.</b> Cuando se suspenda o revoque la autorización de una entidad, si esta desea que se restablezca su condición de entidad <del>autorizada debería solicitar</del> <del>autorizada, solicitará</del> a la ONPF el restablecimiento de la autorización.	P	<b>OIRSA</b> Mejor comprensión del párrafo <i>Category : EDITORIAL</i>
956	127	<b>Restablecimiento.</b> Cuando se suspenda o revoque la autorización de una entidad, si esta desea que se restablezca su condición de entidad autorizada debería solicitar a la ONPF el restablecimiento de la autorización.	C	<b>Colombia</b> Presentar una definición del término permitirá aclarar que acciones se deben realizar. <i>Category : SUBSTANTIVE</i>
957	128	An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization status <del>reinstated should</del> <del>reinstated should</del> also apply to the NPPO for reinstatement.	P	<b>Canada</b> <i>Category : EDITORIAL</i>
958	128	An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization <del>status reinstated should</del> <del>reinstated should</del> also apply to the NPPO for reinstatement.	P	<b>European Union</b> Useless word. <i>Category : EDITORIAL</i>
959	128	An entity that has voluntarily withdrawn from an authorization <del>programme</del> <del>arrangement</del> and that wishes to have its authorization status <del>reinstated should</del> <del>reinstated should</del> also apply to the NPPO for reinstatement.	P	<b>European Union</b> The term "authorization programme" is not clear. The term "arrangement" is suggested (it is used e.g. in paragraphs 45, 53 and 64). <i>Category : TECHNICAL</i>
960	128	An entity that has voluntarily withdrawn from an authorization <del>programme</del> <del>arrangement</del> and that wishes to have its authorization <del>status</del> <del>reinstated should</del> also apply to the NPPO for reinstatement.	P	<b>EPPO</b> Useless word  The term "authorization programme" is not clear. The term "arrangement" is suggested (it is used e.g. in paragraphs 45, 53 and 64).

				<i>Category : TECHNICAL</i>
961	128	An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization status <del>reinstated</del> <u>should-reinstated should</u> also apply to the NPPO for reinstatement.	P	<b>Japan</b> <i>Category : EDITORIAL</i>
962	128	An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization status <del>reinstated</del> <u>should-reinstated, should</u> also apply to the NPPO for reinstatement.	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> <i>Category : EDITORIAL</i>
963	128	An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization status <del>reinstated</del> should also apply to the NPPO for reinstatement.	C	<b>United States of America</b> Should "voluntary withdrawal" be another type of status? <i>Category : TECHNICAL</i>
964	128	An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization status <del>reinstated</del> <u>should-reinstated should</u> also apply to the NPPO for reinstatement.	P	<b>APPPC</b> 116) New Zealand (7 Sep 2018 7:00 AM) <i>Category : EDITORIAL</i>
965	128	An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization status <del>reinstated</del> <u>should-reinstated should</u> also apply to the NPPO for reinstatement.	P	<b>IPPC Regional Workshop Africa</b> <i>Category : EDITORIAL</i>
966	128	An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization status <del>reinstated</del> <u>should-reinstated should</u> also apply to the NPPO for reinstatement.	P	<b>NEPPO</b> <i>Category : EDITORIAL</i>
967	128	An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization status <del>reinstated</del> <u>should-reinstated should</u> also apply to the NPPO for reinstatement.	P	<b>Singapore</b> inclusion of missing space between words. <i>Category : EDITORIAL</i>
968	129	<b>Potential implementation issues</b>	C	<b>Jamaica</b> Developing countries may not be able to establish the legal framework needed for the implementation of this standard. Resources to implement the standard. Existing competencies in developing countries.  <i>Category : SUBSTANTIVE</i>
969	129	<b>Potential implementation issues</b>	C	<b>IPPC Regional Workshop Africa</b> Fixing of costs-whereas NPPO may charge minimal fee as per the relevant regulations, private entities may push for higher profits leading to high costs of authorized services. There is need for the government to regulate the charges so that the industry is not forced to evade the authorized service providers. Moreover, the government may need to subsidize the initiate investments needed by the authorized private entities for purposes of price stabilization <i>Category : TECHNICAL</i>
970	129	<b>Potential implementation <del>issues</del><u>issues (compatibility with Standard 15?)</u></b>	P	<b>Montenegro</b>

				<i>Category : TECHNICAL</i>
971	130	<del>This section is not part of the standard. The Standards Committee in May 2016 requested the Secretariat to gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues.</del> <i>Inadequate human resource and the weak technical capacities of personnel of the entities and NPPO would greatly hinder the implementation of this standard. The lack or weak support for plant health in the legal framework would also limit the implementation of the standard. Therefore there is need to support NPPO's and private entities in terms of technical capacity development to enable them apply phytosanitary measures as indicated by the standard.</i>	P	<b>Gambia</b> <i>Category : SUBSTANTIVE</i>
972	130	This section is not part of the standard. The Standards Committee in May 2016 requested the Secretariat to gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues.	C	<b>Nigeria</b> Previous comments by Nigeria stands . <i>Category : SUBSTANTIVE</i>
973	130	This section is not part of the standard. The Standards Committee in May 2016 requested the Secretariat to gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues.	C	<b>Caribbean Agricultural Health and Food Safety Agency</b> Potential implementation issues include: -Legal framework -Entities authorized to conduct audit -Existing competencies within the country -Policy actions required -Role of internal phytosanitary systems and entities (not for import/export) -Additional costs to perform certain actions <i>Category : SUBSTANTIVE</i>
974	130	This section is not part of the standard. The Standards Committee in May 2016 requested the Secretariat to gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues.	C	<b>United States of America</b> NPPOs may face funding challenges in implementing the standard. <i>Category : TECHNICAL</i>
975	130	This section is not part of the standard. The Standards Committee in May 2016 requested the Secretariat to gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues.	C	<b>IPPC Regional Workshop Africa</b> Lack of Legal Framework and difficulties in enacting the laws and also lack of resources to enact the law by some African NPPOs will hinder the implementation of this standard. <i>Category : SUBSTANTIVE</i>
976	130	Esta sección no es parte de la norma. En el mayo de 2016 el Comité de Normas pidió a la secretaria de la CIPF para reunir información sobre los posibles problemas de implementación relacionados con este proyecto. Le rogamos indicar los detalles y propuestas sobre cómo hacer frente a estos posibles problemas de implementación.	C	<b>Colombia</b> Entre los principales problemas que presenta la implementación de esta NIMF para Colombia se encuentra:  - Difícil implementación debido a que no existen entidades con la experiencia y conocimiento para ejecutar acciones fitosanitarias. - Los costos para la operación para las empresas autorizadas son demasiados altos, - Muchas de las acciones fitosanitarias realizadas por el ICA no tiene un costo para los beneficiarios, sin embargo, para cuando se tercericen se les deberá colocar un costo. - Resistencia al cambio por parte de los usuarios y procesos complejos para que acepten a las empresas autorizadas.

				- Criterios de imparcialidad por parte de las empresas autorizadas a emprender acciones fitosanitarias <i>Category : SUBSTANTIVE</i>
977	130	Esta sección no es parte de la norma. En el mayo de 2016 el Comité de Normas pidió a la secretaría de la CIPF para reunir información sobre los posibles problemas de implementación relacionados con este proyecto. Le rogamos indicar los detalles y propuestas sobre cómo hacer frente a estos posibles problemas de implementación.	C	<b>Costa Rica</b> No se tenga en el país la legislación para la implementación Capacidad técnica para la evaluación y la auditoría <i>Category : SUBSTANTIVE</i>