2020 SECOND CONSULTATION

1 July - 30 September 2020

Compiled comments for Draft PT: Cold treatment of Ceratitis capitata on Vitis vinifera (2017-023A)

Summary of comments

Name	Summary
Cuba	No hay comentarios al documento propuesto.
European Union	The comments have been introduced by the European Commission on behalf of the European Union and its Member States.
Myanmar	Agree with the document
OIRSA	Revisión Completa
Singapore	Singapore is supportive of this.

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

FAO sequential number	Para	Text	т	Comment
1	G	(General Comment)	С	Category: SUBSTANTIVE (28) Guyana (30 Sep 2020 10:05 PM) Guyana has no reservation regarding the draft document at this point.
2	G	(General Comment)	С	Category: TECHNICAL (27) Peru (30 Sep 2020 4:40 PM) Peru agrees with COSAVE's comments.
3	G	(General Comment)	С	Category: TECHNICAL (26) Australia (30 Sep 2020 1:01 PM) Australia has reviewed this phytosanitary treatment and is supportive of this treatment and the respective text.
4	G	(General Comment)	С	Category: SUBSTANTIVE (25) Brazil (29 Sep 2020 10:32 PM) Brazil supports COSAVE's general comment.
5	G	(General Comment)	С	
6	G	(General Comment)	С	Category: TECHNICAL (20) Paraguay (29 Sep 2020 3:30 PM) Paraguay agrees with Cosave's comments
7	G	(General Comment)	С	
8	G	(General Comment)	С	
9	G	(General Comment)	С	Category : TECHNICAL (17) COSAVE (29 Sep 2020 4:02 AM)

				We noted the TPPT response to our comment submitted during the first consultation regarding mentioning cultivars in Section "other relevant information". However, we suggest do not include cultivars to avoid confusion when implementing treatment schedule. According to ISPM 28, a requirement for varietal testing should be based on evidence that the varietal differences affect treatment efficacy, and data should be provided to support the requirement. However, the information provided on cultivars in this draft does not show evidence about differences among cultivar treatments but it only mentions general information on which cultivars the treatments were performed. On the other hand, detailed information of cultivars used in developing treatment schedules can be found in the references listed in "References" section. Tomamos nota de la respuesta del PTTF a nuestro comentario presentado durante la primera consulta con respecto a la mención de cultivares en la Sección "otra información relevante". Sin embargo, sugerimos no incluir cultivares para evitar confusiones al implementar el protocolo de tratamiento . De acuerdo con la NIMF 28, el requisito de pruebas varietales debe basarse en evidencia de que las diferencias varietales afectan la eficacia del tratamiento, y se deben proporcionar datos para respaldar el requisito. Sin embargo, la información sobre los cultivares que se detallan en este borrador, no ofrece evidencia de diferencias entre los tratamientos entre cultivares sino que sólo se trata de información general sobre los cuales se realizaron los ensayos. Por otro lado, la
				información detallada de los cultivares utilizados en el desarrollo de los protocolos de tratamiento se puede consultar en las referencias listadas
				en la sección "Referencias".
10	G	(General Comment)	С	Category : SUBSTANTIVE
				(16) OIRSA (28 Sep 2020 7:08 PM) Sin comentarios de trascendencia para este documento.
11	G	(General Comment)	С	Category : SUBSTANTIVE
11		(Solicial Commency		(15) Barbados (28 Sep 2020 6:26 PM)
				Barbados has no changes to make to this draft ISPM.
12	G	(General Comment)	С	Category : SUBSTANTIVE
		,		(13) Mexico (26 Sep 2020 5:46 AM)
				Mexico supports the DRAFT ANNEX TO ISPM-28: Cold treatment for
				Ceratitis capitata on Vitis vinifera (2017-023A)
13	G	(General Comment)	С	Category: SUBSTANTIVE (11) China (23 Sep 2020 8:37 AM)
				The treatment efficacy of cold treatment should be based the mortality
				of the most tolerant stage of target pest.
				Cold treatment should apply to achieve pest mortality in treatment
				objective in ISPM 42, all the PTs adopted after April of 2018 should be
				consensus as its requirements.
				2. The pest mortality is the key standard for temperature treatment

			according the outline of requirements and requirements in ISPM 42. The measure of treatment efficacy for eggs and larvae in the drafts of 2017-022A, 2017-022B, 2017-023A, 2017-023B is not comply with the requirements. Even though those words like "kill" and "failure to pupariate" are used in the revision drafts, the endpoint for efficacy is preventing pupation in fact. 3.The TPPT response of "failure to pupariate" is accepted in ISPM 28 PT24, PT25, PT26, PT30 and PT31, but the PTs had published before the adoption of ISPM 42. It can not be the cases for the new PTs of temperature treatment. The endpoint of "failure to pupariate" have been accepted in the published PTs (PT24, PT25, PT26, PT30 and PT31), as the TPPT explained, but all these TPs endorsed before the adoption of ISPM 42, then, this cannot be regard as the reason for the inconsistency with the new criteria for temperature treatment. 4.Preventing successful development or inability to reproduce is only applied to irradiation treatment. The endpoint standard is also one of obstacles for using irradiation treatment. So as to facility the application of this standards, failure to pupariate should not be used in cold treatments. The annex of ISPM 28 is important as the guideline of the technology for phytosanitary treatment, once failure to pupariate is accepted as endpoint for cold treatment, is meaning failure to pupariate can be used in the other researches of cold treatment? The ISPM 28 and its annexes have an important guiding role in the development of phytosanitary treatment technology. If the prevention of pupation can be regarded as the criteria for judging the effect of cold treatment, there will be a lot of research to follow this criterion in the future, which will be difficult to apply in practice. If exceptions are still allowed, is the prevention of fruit fly emergence acceptable as a criterion for determining the effect of cold treatment?
14 G	(General Comment)	С	Category: TECHNICAL (10) Uruguay (22 Sep 2020 5:20 PM) We noted the TPPT response to our comment submitted during the first consultation regarding mentioning cultivars in Section "other relevant information". However, we suggest do not include cultivars to avoid confusion when implementing treatment schedule. According to ISPM 28, a requirement for varietal testing should be based on evidence that the varietal differences affect treatment efficacy, and data should be provided to support the requirement. However, the information provided on cultivars in this draft does not show evidence about differences among cultivar treatments but it only mentions general information on which cultivars the treatments were performed. On the other hand, detailed information of cultivars used in developing treatment schedules can be found in the references listed in "References" section. Tomamos nota de la respuesta del PTTF a nuestro comentario

				presentado durante la primera consulta con respecto a la mención de cultivares en la Sección "otra información relevante". Sin embargo, sugerimos no incluir cultivares para evitar confusiones al implementar el protocolo de tratamiento . De acuerdo con la NIMF 28, el requisito de pruebas varietales debe basarse en evidencia de que las diferencias varietales afectan la eficacia del tratamiento, y se deben proporcionar datos para respaldar el requisito. Sin embargo, la información sobre los cultivares que se detallan en este borrador, no ofrece evidencia de diferencias entre los tratamientos entre cultivares sino que sólo se trata de información general sobre los cuales se realizaron los ensayos. Por otro lado, la información detallada de los cultivares utilizados en el desarrollo de los protocolos de tratamiento se puede consultar en las referencias listadas en la sección "Referencias".
15	G	(General Comment)	С	
16	G	(General Comment)	С	Category: SUBSTANTIVE (5) Malawi (5 Sep 2020 2:00 PM) we agree with annex
17	G	(General Comment)	С	Category: SUBSTANTIVE (4) Thailand (2 Sep 2020 10:50 AM) Thailand has no objection on the proposed draft Cold treatment for Ceratitis capitata on Vitis vinifera.
18	G	(General Comment)	С	·
19	1	DRAFT ANNEX TO ISPM 28: Cold treatment for Ceratitis capitata on Vitis vinifera (2017-023A)	С	
20	1	DRAFT ANNEX TO ISPM 28: Cold treatment for Ceratitis capitata on Vitis vinifera (2017-023A)	С	Category: TECHNICAL (2) Kenya (27 Aug 2020 12:35 PM) No comment Kenya in agreement with the standard
21	13	2018-05 SC-Standards Committee (SC) added the topic Cold treatment of Ceratitis capitata on table grapes (2017-023A) to the TPPT work programme with priority 1.	Р	Category: EDITORIAL (21) European Union (29 Sep 2020 5:23 PM) Acronym to be developed for its first use.
22	13	2018-05 SC-Standars Committee (SC) added the topic Cold treatment of Ceratitis capitata on table grapes (2017-023A) to the TPPT work programme with priority 1.	Р	Category: EDITORIAL (7) EPPO (15 Sep 2020 1:34 PM) Acronym to be developed for its first use.

23	43	For all three schedules, the fruit must reach the treatment temperature before treatment exposure time commences. The fruit core temperature should be monitored and recorded in intervals, and the temperature should not exceed the stated level throughout the duration of the treatment. The treatment should be repeated if failed to reach the scheduled temperature for certain time.	P	Category : EDITORIAL (3) Egypt (28 Aug 2020 6:10 PM)
24	46	In evaluating this treatment, the Technical Panel on Phytosanitary Treatments (TPPT) considered issues associated with temperature regimes and thermal conditioning, taking into account the work of Hallman and Mangan (1997).	Р	Category: EDITORIAL (22) European Union (29 Sep 2020 5:24 PM) Because of the addition proposed after [48].
25	46	In evaluating this treatment, the Technical Panel on Phytosanitary Treatments (TPPT) considered issues associated with temperature regimes and thermal conditioning, taking into account the work of Hallman and Mangan (1997).	Р	Category: EDITORIAL (8) EPPO (15 Sep 2020 1:34 PM) Because of the addition proposed after [48].
26	48	Schedules 1, 2 and 3 were based on the work of De Lima (2007) and De Lima <i>et al.</i> (2011) and were developed using the cultivars 'Red Globe', 'Crimson Seedless' and 'Thompson Seedless', and using failure to pupariate as the measure of mortality. The TPPT also considered De Lima et al. (2017).	P	Category: EDITORIAL (23) European Union (29 Sep 2020 5:25 PM) This addition is proposed because this reference is not mentioned in the text (please see the the SC response to the EPPO/EU comment made during first consultation: "This reference is not mentioned in the draft but the TPPT has reviewed it for making this draft PT"). It is consistent with the draft PT 2017-011 sent for first consultation.
27	48	Schedules 1, 2 and 3 were based on the work of De Lima (2007) and De Lima <i>et al.</i> (2011) and were developed using the cultivars 'Red Globe', 'Crimson Seedless' and 'Thompson Seedless', and using failure to pupariate as the measure of mortality. The TPPT also considered De Lima <i>et al.</i> (2017).	Р	Category: EDITORIAL (9) EPPO (15 Sep 2020 1:34 PM) This addition is proposed because this reference is not mentioned in the text (please see the the SC response to the EPPO/EU comment made during first consultation: "This reference is not mentioned in the draft but the TPPT has reviewed it for making this draft PT"). It is consistent with the draft PT 2017-011 sent for first consultation.
28	53	De Lima C.P.F., Mansfield E.R., & Poogoda S.R. 2017. International market access for Australian tablegrapes through cold treatment of fruit flies with a review of methods, models and data for fresh fruit disinfestation. <i>Australian Journal of Grape and Wine Research</i> , 23: 306–317.	Р	Category: EDITORIAL (12) China (23 Sep 2020 8:38 AM) It should be consistent with requirement of reference.