

February 2008

E



منظمة الأغذية
والزراعة
للأمم المتحدة

联合国
粮食及
农业组织

Food
and
Agriculture
Organization
of
the
United
Nations

Organisation
des
Nations
Unies
pour
l'alimentation
et
l'agriculture

Organización
de las
Naciones
Unidas
para la
Agricultura
y la
Alimentación

COMMISSION ON PHYTOSANITARY MEASURES

Third Session

Rome, 7 – 11 April 2008

**Letters Received in Relation to the Draft ISPM on Methyl Bromide
(from Argentina, Bolivia, Brazil, Chile)**

Agenda Item 9.2 of the Provisional Agenda

1. The letters attached were received from Argentina, Bolivia, Brazil and Chile in relation to the draft ISPM: Replacement or reduction of methyl bromide as a phytosanitary measure (Annex 4 of document CPM 2008/2).

For reasons of economy, this document is produced in a limited number of copies. Delegates and observers are kindly requested to bring it to the meetings and to refrain from asking for additional copies, unless strictly indispensable.
Most FAO meeting documents are available on Internet at www.fao.org

W0000



Ministerio de la Producción
Secretaría de Agricultura, Ganadería, Pesca y Alimentos
Servicio Nacional de Sanidad y Calidad Agroalimentaria

To: IPPC Secretariat
Plant Protection Service (AGPP)
Food and Agriculture Organization of the United Nations
Viale delle Terme di Caracalla
00100 Rome, Italy
Tel: (+39 06) 5705 4812
Fax: (+39 06) 5705 4819
e-mail: IPPC@fao.org
Ing. Agr. Diana Maria Guillen
Directora Nacional de Protección Vegetal – SENASA
Av. Paseo Colon 315 4° A

From: Tel: 011-4121-5176
Fax: 011-4121-5179
E mail: dguillenar@yahoo.com.ar

About: Objection to approval as an ISPM of the draft on: Developing a strategy to reduce or replace the use of methyl bromide for phytosanitary purposes

Date: 11/02/2008

IPPC Secretariat:

About the documents posted on December 14th 2007 and specifically on document 191645_CPM2007_2, we want to let you know that we should not be able to approve, as an ISPM, the draft on: "Developing a strategy to reduce or replace the use of methyl bromide for phytosanitary purposes" and ask for your kindness to release to IPPC contracting parties this note at the time to address this issue at CPM- 3.

The importance to reduce or replace MB is fully recognized, taking into account that the IPPC preamble establishes that contracting parties have to take into account internationally approved principles governing the protection of plant, human and animal health, and the environment, nevertheless this draft only could considered as a set of recommendations to IPPC contracting parties.

Our comments on this issue are the following:

Dirección Nacional de Protección Vegetal – SENASA
Av. Paseo Colon 315- 4° piso frente
TEL. 4121-5176 FAX: 4121 5179
E mail: dnpv@senasa.gov.ar



Ministerio de la Producción
Secretaría de Agricultura, Ganadería, Pesca y Alimentos
Servicio Nacional de Sanidad y Calidad Agroalimentaria

- Latin America and the Caribbean has not been represented in the EWG, which was held in November 2006 in Orlando (USA) and that prepared a revised draft.
- At the time of the review of the draft by the SC in May 2007, our representatives explained that this document could not be considered a standard, before it was sent for member consultation.
- In the comments sent by our country, we let clear that the content of the document could not be considered an ISPM, because it is a set of recommendations to reduce or replace MB, rather than a document providing, for common and repeated use, rules, guidelines or characteristics for activities or their results, as stated in ISPM No. 5 in the definition of "standard".
- The content of the draft text is abstract and expresses a common desire or a policy, but not concrete measures validated and with a determined efficacy to assess its equivalence with the MB use as a phytosanitary measure.
- The SC November 2007 could not reach an agreement on the format of this document and our representatives maintained the same position as on May 2007.
- Other options (rather than an standard), as CPM decisions which are captured in CPM reports either in the body of the report or as appendices to CPM reports look more appropriate for the case of this document and new proposals of format could be available at CPM-3.
- At ICPM-5 (2003) a set of "Recommendations on the future of methyl bromide for phytosanitary purposes" has been adopted and expresses the main concerns of IPPC contracting parties at this regard.

We are also suggesting to review these recommendations and you are going to find below a suggested text.

"Recommendation on the future of methyl bromide for phytosanitary purposes" (to be adopted at CPM-3 (2008))

The III CPM recognizes the need to retain methyl bromide for critical quarantine treatments until suitable alternative phytosanitary treatments or procedures are available.

Dirección Nacional de Protección Vegetal – SENASA
Av. Paseo Colon 315- 4° piso frente
TEL. 4121-5176 FAX: 4121-5179
E mail: dnpe@senasa.gov.ar



Ministerio de la Producción
Secretaría de Agricultura, Ganadería, Pesca y Alimentos
Servicio Nacional de Sanidad y Calidad Agroalimentaria

The ICPM calls on its Members to:

- note that there are technical alternatives available for some phytosanitary measures that use methyl bromide. It is also noted that it is especially difficult to replace methyl bromide in some types of treatments (e.g. treatment of logs that require quarantine treatment at port of entry). Alternatives must be tested to ensure they reach the adequate efficacy and viability in economic and technical grounds to be considered as appropriate for regulated pests and as phytosanitary measures.
- recognize that the highest priority of the Montreal Protocol is to protect the Ozone layer and the majority of countries want to protect the Ozone layer while protecting plant health.
- share useful information that it is believed that NPPOs already have, such as where methyl bromide is used and what treatments exist that are alternatives for methyl bromide.
- submit data on treatments that are alternatives to methyl bromide in response to the call for treatment data. This data would then be reviewed by the Technical Panel on Phytosanitary Treatments and proposed as a new treatment for inclusion in ISPMs.
- receive information on the methyl bromide phase out program.
- evaluate phytosanitary measures intended to eliminate the use of methyl bromide or reduce the frequency and dose of the applications to check if they could be consider as viable alternatives in economically and technically terms as equivalent to the methyl bromide use, taking into account the possible existence of systems approaches, processing, reexportation, etc
- intensify the collaboration with their Ozone Officer in the collection of data on methyl bromide usage
- seek methods to supply funding to help developing countries with the collection of data on alternatives to methyl bromide.
- identify which are the major export commodities that require methyl bromide usage for quarantine purposes and prioritize research into alternative treatments to methyl bromide in these areas.



Ministerio de la Producción
Secretaría de Agricultura, Ganadería, Pesca y Alimentos
Servicio Nacional de Sanidad y Calidad Agroalimentaria

The ICPM calls on its Members to:

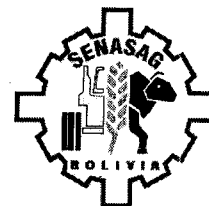
- note that there are technical alternatives available for some phytosanitary measures that use methyl bromide. It is also noted that it is especially difficult to replace methyl bromide in some types of treatments (e.g. treatment of logs that require quarantine treatment at port of entry). Alternatives must be tested to ensure they reach the adequate efficacy and viability in economic and technical grounds to be considered as appropriate for regulated pests and as phytosanitary measures.
- recognize that the highest priority of the Montreal Protocol is to protect the Ozone layer and the majority of countries want to protect the Ozone layer while protecting plant health.
- share useful information that it is believed that NPPOs already have, such as where methyl bromide is used and what treatments exist that are alternatives for methyl bromide.
- submit data on treatments that are alternatives to methyl bromide in response to the call for treatment data. This data would then be reviewed by the Technical Panel on Phytosanitary Treatments and proposed as a new treatment for inclusion in ISPMs.
- receive information on the methyl bromide phase out program.
- evaluate phytosanitary measures intended to eliminate the use of methyl bromide or reduce the frequency and dose of the applications to check if they could be consider as viable alternatives in economically and technically terms as equivalent to the methyl bromide use, taking into account the possible existence of systems approaches, processing, reexportation, etc
- intensify the collaboration with their Ozone Officer in the collection of data on methyl bromide usage
- seek methods to supply funding to help developing countries with the collection of data on alternatives to methyl bromide.
- identify which are the major export commodities that require methyl bromide usage for quarantine purposes and prioritize research into alternative treatments to methyl bromide in these areas.

Dirección Nacional de Protección Vegetal SENASA
Av. Paseo Colón 315- 4° piso frente
TEL: 4121 5176 FAX: 4121-5179
E mail: dnpro@senasa.gov.ar

DIANA MARÍA GUILLEN
M.P. 1003
DIRECCIÓN NACIONAL DE PROTECCIÓN VEGETAL
SENASA



Ministerio de Desarrollo Rural,
Agropecuario y Medio Ambiente



To: IPPC Secretariat
Plant Protection Service (AGPP)
Food and Agriculture Organization of the United Nations
Viale delle Terme di Caracalla
00100 Rome, Italy
Tel: (+39 06) 5705 4812
Fax: (+39 06) 5705 4819
e-mail: IPPC@fao.org

From: **Pedro Ernesto Zavaleta Castro**
Jefe Nacional de Sanidad Vegetal
SERVICIO NACIONAL DE SANIDAD AGROPECUARIA E INOCUIDAD
ALIMENTARIA (SENASAG)
Calle Jose Natush s/n. Trinidad, Beni - Bolivia
Tel/Fax: (+591) 34628105 – 34628106 – 34628107
e-mail: pzavaleta@senasag.gov.bo, pedrozavaleta2002@yahoo.com

About: Objection to approval as an ISPM of the draft on: Developing a strategy to reduce or replace the use of methyl bromide for phytosanitary purposes

Date: 24/12/2007

IPPC Secretariat:

About the documents posted on December 14th, 2007 and specifically on document 191645_CPM2007_2, we want to let you know that we should not be able to approve, as an ISPM, the draft on: "Developing a strategy to reduce or replace the use of methyl bromide for phytosanitary purposes" and ask for your kindness to release to IPPC contracting parties this note at the time to address this issue at CPM- 3.

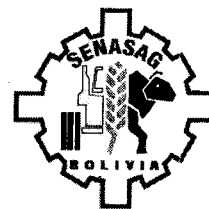
The importance to reduce or replace MB is fully recognized, taking into account that the IPPC preamble establishes that contracting parties have to take into account internationally approved principles governing of plant protection, human and animal health, and the environment, nevertheless this draft only could considered as a set of recommendations to IPPC contracting parties.

Our comments on this issue are the following:

- Latin America and the Caribbe has not been represented in the EWG, which was held in November 2006 in Orlando (FL) (USA) and that prepared a check over draft.
- At the time of the review of the draft by the SC in May 2007, our representatives explained that this document could not be considered a standard, before it was sent for member consultation.
- In the comments sent by our country, we let clear that the content of the document could not be considered an ISPM, because it is a set of recommendations to reduce or replace MB, rather than



Ministerio de Desarrollo Rural,
Agropecuario y Medio Ambiente



a document providing, for common and repeated use, rules, guidelines or characteristics for activities or their results, as stated in ISPM No. 5 in the definition of "standard".

- The content of the draft text is abstract and express a common desire or a policy, but not concrete measures validated and with a determined efficacy to assess its equivalence with the MB use as a phytosanitary measure.
- The SC November 2007 could not reach an agreement on the format of this document and our representatives maintained the same position as on May 2007.
- Other options (rather than an standard), as CPM decisions which are captured in CPM reports either in the body of the report or as appendices to CPM reports look more appropriate for the case of this document and new proposals of format could be available at CPM-3.
- At ICPM-5 (2003) a set of "Recommendations on the future of methyl bromide for phytosanitary purposes" has been adopted and expresses the main concerns of IPPC contracting parties at this regard.

We are also suggesting to review these recommendations and you are going to find below a suggested text.

"Recommendation on the future of methyl bromide for phytosanitary purposes" (to be adopted at CPM-3 (2008))

The III CPM recognizes the need to retain methyl bromide for critical quarantine treatments until suitable alternative phytosanitary treatments or procedures are available.

The ICPM calls on its Members to:

- note that there are technical alternatives available for some phytosanitary measures that use methyl bromide. It is also noted that it is especially difficult to replace methyl bromide in some types of treatments (e.g. treatment of logs that require quarantine treatment at port of entry). Alternatives must be tested to ensure they reach the adequate efficacy and viability in economic and technical grounds to be considered as appropriate for regulated pests and as phytosanitary measures.
- recognize that the highest priority of the Montreal Protocol is to protect the Ozone layer and the majority of countries want to protect the Ozone layer while protecting plant health.
- share useful information that it is believed that NPPOs already have, such as where methyl bromide is used and what treatments exist that are alternatives for methyl bromide.



Ministerio de Desarrollo Rural,
Agropecuario y Medio Ambiente



- submit data on treatments that are alternatives to methyl bromide in response to the call for treatment data. This data would then be reviewed by the Technical Panel on Phytosanitary Treatments and proposed as a new treatment for inclusion in ISPMs.
- receive information on the methyl bromide phase out program.
- evaluate phytosanitary measures intended to eliminate the use of methyl bromide or reduce the frequency and dose of the applications to check if they could be considered as viable alternatives in economically and technically terms as equivalent to the methyl bromide use, taking into account the possible existence of systems approaches, processing, reexportation, etc
- intensify the collaboration with their Ozone Officer in the collection of data on methyl bromide usage
- seek methods to supply funding to help developing countries with the collection of data on alternatives to methyl bromide.
- identify which are the major export commodities that require methyl bromide usage for quarantine purposes and prioritize research into alternative treatments to methyl bromide in these areas.
- reduce the loss of methyl bromide into the atmosphere through the use of new technologies such as gas recovery.
- provide guidance on the necessity for emergency action fumigation and on alternative phytosanitary measures to methyl bromide based on a more accurate knowledge of the pests concerned.
- improve linkages between the CPM Bureau and technical bodies operating under the Montreal Protocol in order to obtain greater understanding of the work being done in both bodies and communicate phytosanitary concerns arising through reduced or lost availability of methyl bromide.
- communicate details of the essential phytosanitary uses of methyl bromide to other relevant agencies and interest groups.

Best regards,


Mig. Ángel Pedro F. Zavaleta Castro
JEFE NACIONAL DE SANIDAD VEGETAL
SENASAG - BOLIVIA





Ministério da Agricultura, Pecuária e Abastecimento
Secretaria de Defesa Agropecuária
Departamento de Sanidade Vegetal – Organização Nacional de Proteção
Fitossanitária do Brasil



To: IPPC Secretariat
Plant Protection Service (AGPP)
Food and Agriculture Organization of the United Nations
Viale delle Terme di Caracalla
00100 Rome, Italy
Tel: (+39 06) 5705 4812
Fax: (+39 06) 5705 4819
e-mail: IPPC@fao.org

From: Girabis Evangelista Ramos, NPPO Director of Brazil

About: Objection to approval as an ISPM of the draft on: Developing a strategy to reduce or replace the use of methyl bromide for phytosanitary purposes

Date: December 19, 2007

IPPC Secretariat:

About the documents posted on December 14th 2007 and specifically on document 191645_CPM2007_2, we want to let you know that we should not be able to approve, as an ISPM, the draft on: "Developing a strategy to reduce or replace the use of methyl bromide for phytosanitary purposes" and ask for your kindness to release to IPPC contracting parties this note at the time to address this issue at CPM- 3.

The importance to reduce or replace MB is fully recognized, taking into account that the IPPC preamble establishes that contracting parties have to take into account internationally approved principles governing the protection of plant, human and animal health, and the environment, nevertheless this draft only could considered as a set of recommendations to IPPC contracting parties.

Our comments on this issue are the following:

- Latin America and the Caribbean has not been represented in the EWG, which was held in November 2006 in Orlando (USA) and that prepared a revised draft.
- At the time of the review of the draft by the SC in May 2007, our representatives explained that this document could not be considered a standard, before it was sent for member consultation.
- In the comments sent by our country, we let clear that the content of the document could not be considered an ISPM, because it is a set of recommendations to reduce or replace MB, rather than a document providing, for common and repeated use, rules, guidelines or characteristics for activities or their results, as stated in ISPM No. 5 in the definition of "standard".
- The content of the draft text is abstract and expresses a common desire or a policy, but not concrete measures validated and with a determined efficacy to assess its equivalence with the MB use as a phytosanitary measure.
- The SC November 2007 could not reach an agreement on the format of this document and our representatives maintained the same position as on May 2007.
- Other options (rather than an standard), as CPM decisions which are captured in CPM reports either in the body of the report or as appendices to CPM reports look more appropriate for the case of this document and new proposals of format could be available at CPM-3.



- At ICPM-5 (2003) a set of “Recommendations on the future of methyl bromide for phytosanitary purposes” has been adopted and expresses the main concerns of IPPC contracting parties at this regard.

We are also suggesting to review these recommendations and you are going to find below a suggested text.

**“Recommendation on the future of methyl bromide for phytosanitary purposes”
(to be adopted at CPM-3 (2008))**

The III CPM recognizes the need to retain methyl bromide for critical quarantine treatments until suitable alternative phytosanitary treatments or procedures are available.

The ICPM calls on its Members to:

- note that there are technical alternatives available for some phytosanitary measures that use methyl bromide. It is also noted that it is especially difficult to replace methyl bromide in some types of treatments (e.g. treatment of logs that require quarantine treatment at port of entry). Alternatives must be tested to ensure they reach the adequate efficacy and viability in economic and technical grounds to be considered as appropriate for regulated pests and as phytosanitary measures.
- recognize that the highest priority of the Montreal Protocol is to protect the Ozone layer and the majority of countries want to protect the Ozone layer while protecting plant health.
- share useful information that it is believed that NPPOs already have, such as where methyl bromide is used and what treatments exist that are alternatives for methyl bromide.
- submit data on treatments that are alternatives to methyl bromide in response to the call for treatment data. This data would then be reviewed by the Technical Panel on Phytosanitary Treatments and proposed as a new treatment for inclusion in ISPMs.
- receive information on the methyl bromide phase out program.
- evaluate phytosanitary measures intended to eliminate the use of methyl bromide or reduce the frequency and dose of the applications to check if they could be consider as viable alternatives in economically and technically terms as equivalent to the methyl bromide use, taking into account the possible existence of systems approaches, processing, reexportation, etc
- intensify the collaboration with their Ozone Officer in the collection of data on methyl bromide usage
- seek methods to supply funding to help developing countries with the collection of data on alternatives to methyl bromide.
- identify which are the major export commodities that require methyl bromide usage for quarantine purposes and prioritize research into alternative treatments to methyl bromide in these areas.



- reduce the loss of methyl bromide into the atmosphere through the use of new technologies such as gas recovery.
- provide guidance on the necessity for emergency action fumigation and on alternative phytosanitary measures to methyl bromide based on a more accurate knowledge of the pests concerned.
- improve linkages between the CPM Bureau and technical bodies operating under the Montreal Protocol in order to obtain greater understanding of the work being done in both bodies and communicate phytosanitary concerns arising through reduced or lost availability of methyl bromide.
- communicate details of the essential phytosanitary uses of methyl bromide to other relevant agencies and interest groups.

Best regards,

To: IPPC Secretariat
Plant Protection Service (AGPP)
Food and Agriculture Organization of the United Nations
Viale delle Terme di Caracalla
00100 Rome, Italy
Tel: (+39 06) 5705 4812
Fax: (+39 06) 5705 4819
e-mail: IPPC@fao.org

From: Soledad Castro Dorochessi - Head, Plant Protection Division, SAG - Chile

About: Objection to approval as an ISPM of the draft on: Developing a strategy to reduce or replace the use of methyl bromide for phytosanitary purposes

Date: December 21, 2007

Dear Sirs, IPPC Secretariat:

About the documents posted on December 14th 2007 and specifically on document 191645_CPM2007_2, we would not be able to approve, within the structure of an ISPM, the draft on: "Developing a strategy to reduce or replace the use of methyl bromide for phytosanitary purposes". Therefore, we respectfully request to release this note for circulation among the IPPC contracting parties during the CPM- 3.

The importance to reduce or replace MB is fully recognized, taking into account that the IPPC preamble establishes that contracting parties have to take into account internationally approved principles governing the protection of plant, human and animal health, and the environment. Nevertheless this draft may be considered as a set of recommendations to IPPC contracting parties rather than an international standard.

Our position can be summed up in the following considerations:

- We consider that the basic characteristics of a Standard should meet the objective stated in the definition provided in ISPM N° 5, which is a document providing, for common and repeated use, rules, guidelines or characteristics for activities or their results aimed at the achievement of the optimum degree of order in a given context.
- However, the content of the draft text is abstract and expresses a common desire, but not concrete measures validated and with a determined efficacy to assess its equivalence with the MB use as a phytosanitary measure. A MB quarantine treatment should be required only if a specific pest risk was detected through the PRA, thus in the presence of a risk to be mitigated, the possible alternative measures must have a proven efficacy to be considered equivalent, and the national strategy adopted to reduce the use of MB will probably be based in these alternatives. It is therefore critical that a Standard to develop such a national strategy addresses specifically the methodology to evaluate a possible alternative and to determine whether it can be eligible for use as an equivalent phytosanitary measure and replace MB fumigation.
- Additionally, the CPM decided that it was admissible for the IPPC to produce other types of documents (other of a Standard), which may match more appropriately with the objective of the document. We strongly believe that this is precisely the case, where an issue of global interest, due to its nature and connotations can be more adequately addressed through an IPPC document which is not a standardization of procedures (as is the case for an ISPM).

- Also, it is important to take into account that during the last SC (November 2007), an agreement wasn't reached on the most suitable format for this document.
- On the other hand, at ICPM-5 (2003) a set of "Recommendations on the future of methyl bromide for phytosanitary purposes" was adopted and it expresses the main concerns of IPPC contracting parties on this regard.

Also, we would like to recommend a thorough revision of said recommendations. A suggested approach for this issue during the next CPM could consider the following:

"Recommendation on the future of methyl bromide for phytosanitary purposes" (to be adopted at CPM-3 (2008))

The III CPM recognizes the need to retain methyl bromide for critical quarantine treatments until suitable alternative phytosanitary treatments or procedures are available.

The ICPM calls on its Members to:

- note that there are technical alternatives available for some phytosanitary measures that use methyl bromide. It is also noted that it is especially difficult to replace methyl bromide in some types of treatments (e.g. treatment of logs that require quarantine treatment at port of entry). Alternatives must be tested to ensure they reach the adequate efficacy and viability in economic and technical grounds to be considered as appropriate for regulated pests and as phytosanitary measures.
- recognize that the highest priority of the Montreal Protocol is to protect the Ozone layer and the majority of countries want to protect the Ozone layer while protecting plant health.
- share useful information that it is believed that NPPOs already have, such as where methyl bromide is used and what treatments exist that are alternatives for methyl bromide.
- submit data on treatments that are alternatives to methyl bromide in response to the call for treatment data. This data would then be reviewed by the Technical Panel on Phytosanitary Treatments and proposed as a new treatment for inclusion in ISPMs.
- receive information on the methyl bromide phase out program.
- evaluate phytosanitary measures intended to eliminate the use of methyl bromide or reduce the frequency and dose of the applications to check if they could be considered as viable alternatives in economically and technically terms as equivalent to the methyl bromide use, taking into account the possible existence of systems approaches, processing, reexportation, etc
- intensify the collaboration with their Ozone Officer in the collection of data on methyl bromide usage
- seek methods to supply funding to help developing countries with the collection of data on alternatives to methyl bromide.
- identify which are the major export commodities that require methyl bromide usage for quarantine purposes and prioritize research into alternative treatments to methyl bromide in these areas.
- reduce the loss of methyl bromide into the atmosphere through the use of new technologies such as gas recovery.

- provide guidance on the necessity for emergency action fumigation and on alternative phytosanitary measures to methyl bromide based on a more accurate knowledge of the pests concerned.
- improve linkages between the CPM Bureau and technical bodies operating under the Montreal Protocol in order to obtain greater understanding of the work being done in both bodies and communicate phytosanitary concerns arising through reduced or lost availability of methyl bromide.
- communicate details of the essential phytosanitary uses of methyl bromide to other relevant agencies and interest groups.

Best regards,



MARIA SOLEDAD CASTRO DOROCHESSI
HEAD, PLANT PROTECTION DIVISION