

March 2007

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

Second Session

Rome, 26 – 30 March 2007

Comments on draft standards (CPM 2007/2 - Annex IV)
Recognition of pest free areas and areas of low pest prevalence

Agenda Item 9.2 of the Provisional Agenda

Document by the IPPC Secretariat

1. The Secretariat compiled comments received in advance of the CPM on the draft ISPM on recognition of pest free areas and areas of low pest prevalence from the following members and RPPO:

- Argentina
- Australia
- Bolivia
- Brazil
- Canada
- Chile
- COSAVE
- Japan
- Korea (Republic)
- New Zealand
- Paraguay
- Uruguay
- USA.

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

Draft ISPMs for adoption at CPM-2 (2007)

ANNEX IV OF DOCUMENT CPM 2007/2

DRAFT ISPM: RECOGNITION OF PEST FREE AREAS AND AREAS OF LOW PEST PREVALENCE

The following are comments received as of 14 March 2007 according to guidelines given in the document CPM 2007/2. They are provided for information and the final document will be provided at the CPM meeting.

The Secretariat has compiled in the order of the text the comments received in advance of the CPM meeting, exactly as provided by countries.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
1.	SPECIFIC COMMENTS	Australia	substantive			This scope of this standard is pest free areas and areas of low pest prevalence. Australia would prefer that references to pest free place of production and pest free production sites be deleted from this standard. This is reflected in the comments made below at sections Outline of Requirements, 1 and 5.
2.	SCOPE	Canada	Technical and editorial	First sentence	This standard provides guidance <u>and describes a procedure</u> for the <u>bilateral</u> recognition process for pest free areas and areas of low pest prevalence. It describes a procedure for the bilateral recognition of such areas. This standard does not include specified timelines for the recognition procedure.	Technical: as there may be further work on international/multilateral recognition, and potentially specific ISPMs on that subject, the first sentence should also emphasize the bilateral nature of this standard (as does the second sentence). Editorial: for simplicity, when acting on the technical concern, the first two sentences can be combined.
3.	SCOPE	Argentina, Bolivia, Brazil, Chile, Paraguay, Uruguay, COSAVE	Substantial	End of the text	This standard provides guidance for the recognition process for pest free areas and areas of low pest prevalence. It describes a procedure for the bilateral recognition of such areas. This standard does not include specified timelines for the recognition procedure. <u>Pest free places of production and pest free production sites are also addressed in this standard</u>	Places and sites of production are addressed under the principle of recognition of PFAs and ALPPs in ISPM No.1. ISPM No. 10 (<i>Requirements for the establishment of pest free places of production and pest free production sites</i>) establishes that pest free sites and places of production have the same objective as PFAs but are implemented in a different way. There is no indication in current ISPMs on how to recognize pest free places of production and pest free production sites There is no other ISPM under elaboration for recognition of pest free places of production and pest free production sites

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
4.	OUTLINE OF REQUIREMENTS	Canada	Editorial	First sentence	Recognition of pest free areas (PFAs) and areas of low pest prevalence (ALPPs) is a technical and administrative process to achieve acceptance of the phytosanitary status of a delimited area.	The first word, ‘recognition’, appears to have been italicized unintentionally in the draft text. Or was this an attempt to emphasise the word? If the latter, it is a little confusing.
5.	OUTLINE OF REQUIREMENTS	Australia	editorial	para 2 sentence 3	Contracting parties should endeavour to maintain transparency in all aspects of the recognition process .	Clearer
6.	OUTLINE OF REQUIREMENTS	Australia	substantive	para 6	Some considerations on pest free places of production and pest free sites of production are also provided.	This ISPM provides guidance on "Recognition of pest free areas and areas of low pest prevalence". PFPP and PFSP are outside the scope of this draft ISPM.
7.	BACKGROUND	Argentina, Bolivia, Brazil, Chile, Paraguay, Uruguay, COSAVE	Technical	2 nd para	Importing contracting parties, in meeting their appropriate level of protection and in accordance with requirements for technical justification, may consider PFAs, or ALPPs (in the latter possibly as part of a systems approach), as effective phytosanitary measures. Therefore, it may also be...	To let clear that the possibility to be part of a systems approach corresponds only to an ALPP.
8.	BACKGROUND	Canada	Technical	Second paragraph, second sentence	Therefore, it ismay also be in the interests of the importing country to provide prompt recognition of such areas where they are established in accordance with the relevant ISPMs.	The use of ‘may’ here is both incorrect and adds a sense of unnecessary and unfortunate politicization into the sentence. In terms of reduction of risk, recognition of PFAs that have demonstrably been established in accordance with ISPMs clearly <u>is</u> in the interests of both exporting and importing parties.
9.	BACKGROUND	Australia	substantive	para 4	“The contracting parties shall cooperate with one another to the fullest practicable extent in achieving the aims of this Convention ...” (Article VIII).	Is such a fundamental tenet and should be included in all ISPMs if it was to be included here
10.	BACKGROUND	Argentina, Bolivia, Brazil, Chile, Paraguay, Uruguay, COSAVE	Technical	Proposed last para	Recently and during the review of ISPM no. 1, the principle of recognition of PFAs and ALPPs has been incorporated, as specified in item 2.5 of this text.	To incorporate one of the most relevant principles for this issue.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
11.	1. General Considerations	Canada	Editorial	First and second paragraphs	Several ISPMs address the establishment of PFAs and ALPPs, and related issues. A range of ISPMs relate directly to the technical requirements for the establishment of PFAs and ALPPs, while many others contain provisions that may be applied in the formal process for recognition of such areas.	Both (single sentence) ‘paragraphs’ address the same subject; therefore they should be combined as one paragraph. (Note: no changes to the text are proposed, the two sentences are simply combined into one paragraph.)
12.	1. General Considerations	Australia	Editorial	para 3	...(sections 2.3 and 2.14 of ISPM No. 4, 2006)	whole of para refers to ISPM 1
13.	1. General Considerations	Australia	Editorial	para 4	...(section 2.3.4 of ISPM No. 4)	whole of para refers to ISPM 4
14.	1. General Considerations	Australia	Editorial	para 5	...(section 3.1.2 of ISPM No. 8)	whole of para refers to ISPM 8
15.	1. General Considerations	Australia	Editorial	para 6 at end of para	..and other regulated articles (section 2.2)	consistency
16.	1. General Considerations	Australia	Editorial	para 7	...and use of those ALPPs (section 3.1).	consistency
17.	1. General Considerations	Australia	Editorial	para 8	...in the family Tephritidae (section 2.2).	consistency
18.	1. General Considerations	Canada	Technical Technical and editorial	Second from last paragraph. Last paragraph	Although the recognition of PFAs and ALPPs may generally require be a bilateral process of <u>information exchange</u> between importing and exporting contracting parties, recognition may take place without a detailed process if agreed between the parties (for example without bilateral negotiations and verification activities). Usually, pest free places of production and pest free production sites should not require a <u>comprehensive</u> recognition process and, therefore, only some-limited guidance is given on use of procedures in particular cases.	It’s always a bilateral ‘process’ that is pursued, the point to be made is rather on the amount of detail or how onerous or comprehensive the process involved should be . Draft text reads poorly. In this case, again a certain ‘process’ of recognition is present, but it should not normally be onerous.
19.	1. General Considerations	Australia	substantive	para 10	Usually, pest free places of production and pest free production sites should not require a recognition process and, therefore, only some guidance is given on use of procedures in particular cases.	This ISPM provides guidance on "Recognition of pest free areas and areas of low pest prevalence". PFPP and PFSP are outside the scope of this draft ISPM.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
20.	1. General Considerations	Korea (Rep.)	Technical	Para 10	Usually, pest free place of production and pest free production sites should not require a recognition process and, therefore, only some guidance is given on use of procedures in particular cases	<p>This standard deals with the requirements to recognize pest free areas and areas of low pest prevalence. Pest free place of production and pest free production sites are out of the scope of this standard</p> <p>Moreover, the ISPM No. 10 designate specific requirements to establish pest free place of production and pest free production site. So, it is not appropriate that pest free place of production or pest free production site should not require a recognition process, and they also need recognition procedure taking into account the requirements in ISPM No.10</p>
21.	1. General Considerations	Argentina, Bolivia, Brazil, Chile, Paraguay, Uruguay, COSAVE	Technical	Last para	Usually, pest free places of production and pest free production sites should not require a recognition process and, therefore, only some guidance is given on use of procedures in particular cases. <u>In cases where a recognition process may be required for pest free places of production and pest free production sites, this standard provides guidance on related procedures.</u>	<p>The erased phrase is an opinion and not a concept extracted from any ISPM.</p> <p>A new neutral phrase is proposed, considering what is stated in ISPM No. 1 and 10.</p>
22.	2. <u>General Related Principles</u>	Argentina, Bolivia, Brazil, Chile, Paraguay, Uruguay, COSAVE	Editorial	Title		To be consistent with language in ISPM No. 1, where no principle is classified as general
23.	2.2 Non-discrimination <u>in the recognition of pest free areas and areas of low pest prevalence</u>	Argentina, Bolivia, Brazil, Chile, Paraguay, Uruguay, COSAVE	Editorial	Single para	In recognizing PFAs and ALPPs, the process used by the importing contracting party for assessing such requests from different exporting contracting parties should be applied <u>according to the principle of non discrimination in a non-discriminatory manner.</u>	To adjust the title to language in ISPM No. 1
24.	2.3 Avoidance of undue delay	Argentina, Bolivia, Brazil, Chile, Paraguay, Uruguay, COSAVE	Technical	Single para	Contracting parties should endeavour to <u>in recognition of</u> recognize PFAs and ALPPs, and to resolve any disagreements related to recognition, without undue delay.	To let clear that not any recognition request leads necessarily to approval.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
25.	2.4 Transparency	Canada	Editorial	First paragraph, first sentence	Updates on progress between the importing and exporting contracting parties should be provided to the designated point of contact as mentioned in <u>(further described in</u> section 3.1), as appropriate or on request . . .	It is the point of contact that is mentioned in section 3.1, not the progress updates, and this can be made clearer for the reader by using brackets as suggested.
26.	2.4 Transparency	Australia	substantive	para 3	To improve transparency, contracting parties are encouraged to make decisions on the recognition of PFAs and ALPPs available through the International Phytosanitary Portal.	Is this the role of the IPP? What are the legal implications and who is responsible for maintaining information on the IPP? International obligations for information sharing and transparency are met through WTO reporting obligation by means of SPS notification which should be automatically picked up by the IPP. The requirement to share information is an obligation of the Convention that applies more broadly than this standard.
27.	2.5 Recognition of pest free areas and areas of low pest prevalence	Argentina, Bolivia, Brazil, Chile, Paraguay, Uruguay, COSAVE	Technical	New proposed item	One of the operational principles established after the review of ISPM No. 1, states that contracting parties should ensure that their phytosanitary measures concerning consignments moving into their territories take into account the status of areas, as designated by the NPPOs of the exporting countries. These may be areas where a regulated pest does not occur or occurs with low prevalence or they may be pest free production sites or pest free places of production.	To include literally one of the most relevant principles on this issue, recently introduced in ISPM No. 1
28.	2.5 6 Other relevant principles of the IPPC and its ISPMs	Argentina, Bolivia, Brazil, Chile, Paraguay, Uruguay, COSAVE	Editorial	Title		To adjust numbering

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
29.	3. Requirements for the Recognition of Pest Free Areas and Areas of Low Pest Prevalence	Argentina, Bolivia, Brazil, Chile, Paraguay, Uruguay, COSAVE	Technical	1 st para	NPPOs are responsible for designation, maintenance and surveillance of establishing, designating and/or declaring PFAs and ALPPs within their territories (Article IV.2e of the IPPC). To establish PFAs or ALPPs and before asking for recognition, NPPOs should take into account: - the appropriate ISPMs that provide technical guidance, i.e. ISPM No. 4 (<i>Requirements for the establishment of pest free areas</i>) for PFAs, ISPM No. 22 (<i>Requirements for the establishment of areas of low pest prevalence</i>) for ALPPs, and ISPM No. 8 (<i>Determination of pest status in an area</i>)	Adjustment to the IPPC text.
30.	3. Requirements for the Recognition of Pest Free Areas and Areas of Low Pest Prevalence	Australia	Editorial	para 1	To establish PFAs or ALPPs, and before asking for prior to seeking their recognition, NPPO should take into account:	
31.	3. Requirements for the Recognition of Pest Free Areas and Areas of Low Pest Prevalence	Argentina, Bolivia, Brazil, Chile, Paraguay, Uruguay, COSAVE	Technical	2 nd dash, 1 st para	- other technical guidance ISPMs that may be developed on establishment of PFAs or ALPPs for specific regulated pests or groups of these pests..... Where the absence of the pest in an area and the PFA status can easily be determined (for example in areas where no records of the pest have been made and, in addition, long term absence of the pest is known or absence is confirmed by surveillance), the process for recognition described in this standard (in section 4) may not be required or very little supporting information may be necessary. In such cases, absence of the pest should be recognized according to the first paragraph of section 3.1.2 of ISPM No. 8 (<i>Determination of pest status in an area</i>) without the need for detailed information or elaborate procedures.	In the IPPC framework there are not technical guides, but ISPMs.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
32.	3. Requirements for the Recognition of Pest Free Areas and Areas of Low Pest Prevalence	Australia	Editorial	para 2	...depending on the type of area and its geography, the method used to establish way the pest status of the area has been established (pest free areas or low pest prevalence area),	better phrasing consistency
33.	3. Requirements for the Recognition of Pest Free Areas and Areas of Low Pest Prevalence	Australia	Editorial	para 3	Where the absence of the pest is absent from in an area and the PFA status can easily be determined (for example in areas where no records of the pest...	better expression
34.	3. Requirements for the Recognition of Pest Free Areas and Areas of Low Pest Prevalence	Argentina, Bolivia, Brazil, Chile, Paraguay, Uruguay, COSAVE	Editorial	Last para	In other cases, such as in areas where <u>a pest has been recently eradicated or suppressed</u> eradication or suppression of a pest has recently been achieved , more detailed information and verification may be required, including items listed in section 4.1.	To clarify
35.	3. Requirements for the Recognition of Pest Free Areas and Areas of Low Pest Prevalence	Australia	Editorial	para 4	In other cases, such as in areas where eradication (ISPM No. 9: Guidelines for pest eradication programmes) or suppression of a pest has recently been achieved, more detailed information and verification may be required, including items listed in section 4.1.	insert reference to eradication ISPM
36.	3. Requirements for the Recognition of Pest Free Areas and Areas of Low Pest Prevalence	Canada	Technical	Last paragraph	In other cases, such as in areas where eradication or suppression of a pest has recently been achieved, more detailed information and verification may be required, including items listed in section 4.1 <u>of this standard</u> .	Since the previous paragraph makes reference to a section of another separate standard, it would assist the reader if this paragraph made it clear that the reference is not to the previously mentioned standard, but to this standard.
37.	3.1 Responsibilities of contracting parties	USA	Technical	Fourth indent	Delete the word "required" at the end and replace it with "if necessary for the recognition process"	To avoid unnecessary requests for additional documentation
38.	3.1 Responsibilities of contracting parties	Australia	editorial	para 1 5 th dash point	- cooperating in the organization of on-site verification visits , if requested.	
39.	3.1 Responsibilities of contracting parties	Australia	substantive	para 2 5 th dash point	- communicating and justifying the need for on-site verification visits and cooperating in the organisation	Why "justify" to whom?

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
40.	3.1 Responsibilities of contracting parties	Australia	substantive	para 2 6 th dash point, 2 nd indent	. if the area is not recognized, providing an explanation, with technical justification, a technical explanation to the exporting contracting party.	Same text used in section 4.5
41.	3.1 Responsibilities of contracting parties	USA	technical	Last paragraph	Delete “necessary” and replace it with “technically justified”	To avoid unnecessary requests for additional documentation
42.	3.1 Responsibilities of contracting parties	Argentina, Bolivia, Brazil, Chile, Paraguay, Uruguay, COSAVE	Technical	Last para	Importing contracting parties should limit any information or data requests associated with an assessment of recognition to those which are necessary-, according to what is stated in item 4.1	To clarify the term” necessary” and relate it to the content of this ISPM.
43.	3.2 Documentation	Canada	Technical		The whole process from initial request to final decision should be sufficiently documented by contracting parties so that the sources of information and rationale used in reaching the decision can be clearly identified and demonstrated .	It is not that information can be ‘demonstrated’, but rather ‘identified’ (the rationale can be demonstrated as necessary).
44.	4. Procedure for the Recognition of Pest Free Areas and Areas of Low Pest Prevalence	Australia	editorial/ substantive	para 1 sentence 3	However, in certain cases a mentioned in the third paragraph of section 3 , a formal process for recognition as described in this standard should may not be needed.	delete unnecessary text "should" implies; according to CPM1 report, section 11.5.1, "should" Means a type of moral or political commitment. In certain cases something ‘should not be needed’? ‘May not be needed’ is probably better.
45.	4. Procedure for the Recognition of Pest Free Areas and Areas of Low Pest Prevalence	Japan	Substantive	Para 1, sentence 2	However, in certain cases, as mentioned in the third paragraph of section 3, the a formal process for recognition as described below in this standard should may not be needed.	Even simplified process should be taken as a formal process. It should be aligned with section 3, para 3.
46.	4.2 Acknowledgement by the importing contracting party of receipt of the information package and indication of its completeness for assessment purposes	New Zealand	Substantive	Para 2	Add – The importing country then verifies the information that has been received.	This statement is included in the flow chart (2 nd rectangular box) but not included in the text.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
47.	4.2 Acknowledgement by the importing contracting party of receipt of the information package and indication of its completeness for assessment purposes	Australia	substantive	para 2 sentence 2	<p>The NPPO of the importing contracting party should promptly acknowledge receipt of the request for recognition and of the accompanying information package to the NPPO of the exporting contracting party. In commencing the assessment, the importing contracting party should, if possible, identify and communicate to the NPPO of the exporting contracting party if any significant component of the information package is missing, or if other significant information may be needed to assess the request. The importing contracting party should designate a point of contact for communications relating to the request for recognition.</p> <p>In commencing the assessment, the importing contracting party should, if possible, identify and communicate to the NPPO of the exporting contracting party if any significant component of the information package is missing, or if other significant information may be needed to assess the request.</p> <p>The NPPO of the exporting contracting party should submit to the NPPO of the importing contracting party any missing information, or may provide an explanation for its absence.</p>	The second sentence in para 1 should be removed to a new 2 nd para to reflect the information flow and this would then match what is described in Appendix 1.
48.	4.2 Acknowledgement by the importing contracting party of receipt of the information package and indication of its completeness for assessment purposes	Australia	editorial	para 3 sentence 3	<p>Likewise if a contracting party has withdrawn of PFA or ALPP (eg uneconomic) and wishes to reinstate it, previous information should be considered.</p>	delete '(e.g. uneconomic)' as it does not mean anything. If it is to stay, text should be (e.g. maintenance of the PFA or ALPP became uneconomic)

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
49.	4.3 Description of assessment process to be used by the importing contracting party	USA	technical	First paragraph, first sentence	Add "...contracting party should <i>in advance</i> describe the process..."	This information really needs to be communicated from the importing country to the exporting country before the exporting country undertakes the process of recognition.
50.	4.3 Description of assessment process to be used by the importing contracting party	Korea (Rep.)	Technical	Para 1, sentence 2	Furthermore, the importing contracting party is encouraged to establish a provisional timetable for completion of the recognition process	There are circumstances that impossible to establish timetable such as multiple request beyond the capacity of importing contracting party, occurrence of unpredicted phytosanitary emergency situation, or non provision of sufficient information from the exporting contracting party, etc. In addition, if the suggested timetable is not followed due to irresistible reasons, it can give negative impact on trade and relationship between both parties So, establishment of timetable is not recommendable.
51.	4.4 Assessment of the technical information	Australia	substantive	para 2	PFA or ALPPs previously recognized by a third country or a contracting party may be considered as a reference for the assessment process.	
52.	4.4 Assessment of the technical information	Australia	substantive	para 4 sentence 1	On-site verification or on-site review of operational procedures may be justified required , based on the results of the ongoing assessment,...	See comment at section 3.1
53.	4.4 Assessment of the technical information	USA	editorial	Fourth paragraph, first sentence	Change "justified" to "required"	
54.	4.4 Assessment of the technical information	Japan	Substantive	Para 5, sentence 2	If at any stage progress is not proceeding in accordance with the provisional timetable, if established, the importing contracting party , upon request of exporting contracting party , should notify, reasons provided and (if appropriate) a new timetable prepared and provided by the importing contracting party to the exporting contracting party.	As stated in 3.1, the importing contracting party is responsible for describing the process including, if possible, an estimated time frame. Therefore, the importing contracting party does not have responsibility to notify the reasons or new timetable to the exporting contracting party, which discourages the importing contracting party from establishing an estimated time frame. Also it is enough for an exporting contracting party to be notified these upon its request in terms of improvement of predictability.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
55.	4.4 Assessment of the technical information	Australia	substantive	para 6 sentence 1	The exporting contracting party may request cancellation or postponement of the assessment at any time. [Should the exporting contracting party request postponement of the assessment, the importing contracting party may assign a different priority to the recognition request, which may result in a delay in the restarting of the assessment.]	Flowchart only has "cancel" not postpone. If postpone retained, insert new sentence as need recognition that resources may be moved to another task and therefore a different priority would be assigned to the recognition request which may mean that the assessment could not be restarted immediately
56.	4.5 Notification of results of assessment	Australia	substantive	para 2	In the event of a disagreement related to the rejection of a request for recognition of a PFA or ALPP, efforts should in the first instance be made bilaterally bilateral discussions may be undertaken to resolve the disagreements.	Better sentence structure but also "in the first instance" implies something more but does not elaborate.
57.	4.6 Official recognition	Canada	Editorial	Last sentence	If the PFA or ALPP is recognized by the importing contracting party, this should be officially communicated to the exporting contracting party, clearly confirming the type of area recognized and identifying the relevant pest(s) for which such recognition applies. And, w Where appropriate, amendment of the phytosanitary import requirements and any associated procedures of the importing contracting party should be made promptly.	The sentence should not begin with ‘and’.
58.	5. Considerations on Pest Free Places of Production and Pest Free Production Sites	Australia, Japan, Korea (Rep.)	substantive	whole section	5. Considerations on Pest Free Places of Production and Pest Free Production Sites Pest free places of production and pest free production sites should not have to be recognized as such using the procedures described above (section 4). ISPM No. 10 (Requirements for the establishment of pest free places of production and pest free production sites) confirms that, for such places and sites, the issuance of a phytosanitary certificate for a consignment by the NPPO is sufficient to confirm that the requirements for a pest free place of production or a pest free production site have been fulfilled. The importing contracting party may require an appropriate additional declaration on the phytosanitary certificate to this effect (section	<u>AUSTRALIA:</u> This ISPM provides guidance on “Recognition of pest free areas and areas of low pest prevalence”. PFPP and PFSP are outside the scope of this draft ISPM. While the same principles apply, most of this text is a duplication of text in other standards. Australia would prefer that this section be deleted. <u>JAPAN:</u> This is out of scope of this standard. <u>KOREA (REP.):</u> This standard deals with the requirements to recognize pest free areas and areas of low pest prevalence. Pest free place of production and pest free production sites are out of the scope of this standard. The recognition process of pest free place of production and pest free production sites has to be considered separately from this draft standard, taking into account the requirements in ISPM No.10.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
					<p>3.2 of ISPM No. 10). ISPM No. 10 (in section 3.3) also indicates: <i>“The NPPO of the exporting country should, on request, make available to the NPPO of the importing country the rationale for establishment and maintenance of pest free places of production or pest free production sites. Where bilateral arrangements or agreements so provide, the NPPO of the exporting country should expeditiously provide information concerning establishment or withdrawal of pest free places of production or pest free production sites to the NPPO of the importing country.”</i> As described in ISPM No. 10: <i>“When complex measures are needed to establish and maintain a pest free place of production or pest free production site, because the pest concerned requires a high degree of phytosanitary security, an operational plan may be needed. Where appropriate, such a plan would be based on bilateral agreements or arrangements listing specific details required in the operation of the system including the role and responsibilities of the producer and trader(s) involved.”</i> In such cases recognition may be based on the procedure recommended in section 4 of this standard or another bilaterally agreed procedure.</p>	
59.	5. Considerations on Pest Free Places of Production and Pest Free Production Sites	Argentina, Bolivia, Brazil, Chile, Paraguay, Uruguay, COSAVE	Technical	New proposed text	Pest free places of production and pest free production sites should not have to be recognized as such using the procedures described above (section 4). ISPM No. 10 (Requirements for the establishment of pest free places of production and pest free production sites; confirms that, for such places and sites, the issuance of a phytosanitary certificate for a consignment by the NPPO is sufficient to confirm that the requirements for a pest free place of production or a pest free production site have been fulfilled. The importing contracting party may require an	<p>The first erased phrase is contradictory with the last erased phrase. ISPM No. 10 does not contain text that states that PCs are <u>sufficient</u> to confirm that requirements for pest free sites or places of production are fulfilled. The relevant issue is that the need for recognition or not must be addressed bilaterally and according to ISPM no. 10 and on this ISPM as is expressed in a new proposed text.</p>

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
					<p>appropriate additional declaration on the phytosanitary certificate to this effect (section 3.2 of ISPM No. 10). ISPM No. 10 (in section 3.3) also indicates: “The NPPO of the exporting country should, on request, make available to the NPPO of the importing country the rationale for establishment and maintenance of pest free places of production or pest free production sites. Where bilateral arrangements or agreements so provide, the NPPO of the exporting country should expeditiously provide information concerning establishment or withdrawal of pest free places of production or pest free production sites to the NPPO of the importing country.” As described in ISPM No. 10: “When complex measures are needed to establish and maintain a pest free place of production or pest free production site, because the pest concerned requires a high degree of phytosanitary security, an operational plan may be needed. Where appropriate, such a plan would be based on bilateral agreements or arrangements listing specific details required in the operation of the system including the role and responsibilities of the producer and trader(s) involved.” In such cases recognition may be based on the procedure recommended in section 4 of this standard or another bilaterally agreed procedure.</p> <p><u>ISPM No. 10 (Requirements for the establishment of pest free places of production and pest free production sites) establishes that the PFA has the same objective as the pest free sites and places of production but is implemented in a different way.</u> <u>ISPM No.10 also indicates that “the NPPO of the exporting country should, on request, make available to the NPPO of the importing country the rationale for establishment and</u></p>	

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
					<p><u><i>maintenance of pest free places of production or pest free production sites. Where bilateral arrangements or agreements so provide, the NPPO of the exporting country should expeditiously provide information concerning establishment or withdrawal of pest free places of production or pest free production sites to the NPPO of the importing country.”(Section 3. 3)</i></u></p> <p><u>Then, when asking for recognition, procedures stated in ISPM No. 10 should be taken into account and recognition may be based in the procedure recommended in section 4 of this standard.</u></p>	
60.	Appendix 1 Flow chart outlining the procedure for the recognition of pest free areas or areas of low pest prevalence	Australia	editorial	3 rd rectangle of flow chart		See comment at section 4.2 re deleting ‘communicates to’ with ‘informs’
61.	Appendix 1 Flow chart outlining the procedure for the recognition of pest free areas or areas of low pest prevalence	USA	technical	Fourth square down	Move “Importing contracting party NPPO describes assessment process to be used” between the current first and second squares.	This information needs to be communicated from the importing country to the exporting country before the exporting country undertakes the process of recognition.
62.	Appendix 1 Flow chart outlining the procedure for the recognition of pest free areas or areas of low pest prevalence	Australia	substantive	Arrow linking Diamond bottom left of flow chart to ‘Area not recognized’ oval		If the exporting contracting party requests cancellation, will the importing contracting party still be required to provide an explanation with technical justification as shown by the arrow? Suggest the arrow is dotted.
63.	Appendix 1 Flow chart outlining the procedure for the recognition of pest free areas or areas of low pest prevalence	Australia	substantive/e ditorial	Diamond bottom left of flow chart	Exporting contracting party NPPO may cancel request cancellation or postponement for of recognition	Should match text in section 4.4 – insert ‘postponement’ if retained at s4.4 for consistency

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
64.	Appendix 1 Flow chart outlining the procedure for the recognition of pest free areas or areas of low pest prevalence	Australia	editorial	Oval bottom right of flow chart “Area is recognized’	Importing contracting party NPPO officially communicates recognition and makes any appropriate amendments to phytosanitary import requirements	Importing NPPO communicates recognition but needs to make the amendments before any communication
65.	Appendix 1 Flow chart outlining the procedure for the recognition of pest free areas or areas of low pest prevalence	Japan	Substantive	Last circle, right	Area is recognized Importing contracting party NPPO officially communicates recognition and <i>,where appropriate,</i> amendment of phytosanitary import requirements	In line with section 4.6 the last sentence.
66.	Appendix 1 Flow chart outlining the procedure for the recognition of pest free areas or areas of low pest prevalence	Australia	editorial	Footnote	Delete and insert after subheading Appendix 1	Consistency - See ISPM 26 and Procedural Manual section 9.8 point 8 as recommended by ICPM 6 Draft standards should be consistent with the Procedural Manual and adopted standards in such matters