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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 VI) Supplement to ISPM No. 5 (*Glossary of phytosanitary terms*): *Debarked and bark-free wood*

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 supplement to ISPM No. 5 (*Glossary of phytosanitary terms)* on debarked and bark-free wood from the following members and RPPO:

- Argentina
- Australia
- Bolivia
- Brazil
- Canada
- Chile
- COSAVE
- EC and its 27 member states
- Japan
- New Zealand
- Norway
- Paraguay
- Uruguay
- USA.

Draft ISPMs for adoption at CPM-2 (2007)

ANNEX VI OF DOCUMENT CPM 2007/2

DRAFT SUPPLEMENT TO ISPM NO. 5 (*GLOSSARY OF PHYTOSANITARY TERMS*): DEBARKED AND BARK-FREE WOOD

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.	***GENERAL COMMENTS***	Australia	**substantive**	All text except proposed definitions	Whilst Australia accepts at face value the definitions in the draft and would support their inclusion in ISPM 15, it does not believe that the draft itself is useful and believes that it does not achieve what is wanted. Australia also queries what the purpose of the supplement is in relation to the revision of ISPM 15 and thinks that it is just likely to cause confusion. Australia requests that further work on this supplement is suspended until the technical justification of bark as a phytosanitary risk is clarified for international agreement. Australia considers bark to be a risk and has its own internal definition on bark free pending further development in the international arena. Australia considers that bark freedom is a phytosanitary treatment that should attract relevant efficacy data before being accepted as an international standard. The draft should be referred back to TPFQ/Forest Research with the view to developing the technical justification on bark. It may be included with ISPM 15 or as a stand alone standard once efficacy data has been evaluated or could be assessed as a phytosanitary treatment if proven to be an effective phytosanitary measure to reduce infestations of wood and wood products.	
2.	***GENERAL COMMENTS***	New Zealand			New Zealand believes that this supplement should be withdrawn until such time as research information is available to support the identification of tolerances. In its present state, it provides limited information and would be of very limited use.	

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3.	***GENERAL COMMENTS***	USA	Substantive		The US would accept the definitions for Debarked and Bark Free Wood with amendments, but not the Glossary supplement. We are concerned that contracting parties may use these definitions on wood packaging material (WPM) which would not be appropriate. We believe that the terms "debarked" or "bark free" should not be used when dealing with WPM so until the issue is resolved with WPM we would like to defer the acceptance of the definitions. This was originally written as a stand alone standard not a supplement to the Glossary. We do not believe that this draft provides enough guidance and believe the guidance as provided in the draft that went out for country consultation provides the guidance needed. The tolerance levels provided in this original draft are more useful.	WPM treated in accordance with ISPM 15 specifications provide for an agreed upon level of phytosanitary security and makes a bark-free, or debarked requirement an unnecessary additional phytosanitary measure. If treatments of wood are carried out appropriately, then the debarked or bark-free wood requirement becomes redundant and, therefore, not a technically justified requirement. The issue is essentially a problem of compliance. We would advise a delay in the approval of the DB and BF wood supplement until studies by the IFQRG are completed. Because of this, we are not ready to accept the supplement at this time. This should be returned back to the TP or WG to add the appropriate guidance.
4.	***GENERAL COMMENTS***	Canada	Substantive	General	In view of various reasons as noted in the column to the right and in all comments below (as well as several comments made during country consultations in 2006), this standard does not appear to be ready for adoption and should be retained in draft form and returned to the Technical Panel for Forest Quarantine (TPFQ) for further development, in conjunction with the revision of ISPM No. 15. This will allow the potential value of a standard relating to bark to be fully realized. Note however that Canada **supports** adoption of the **three definitions** contained in the draft supplement and proposes adoption of these. These three revised definitions should be accepted and added to the Glossary.	Canada recognizes the need for clear and effective guidelines relating to bark, and supports the development of these once there is a comprehensive understanding of the relationships between phytosanitary risks and quantities of remaining bark (in order that meaningful tolerances can be recommended if appropriate). Since work is currently underway to determine conclusively the relationship between risk and remaining bark, moving ahead with the draft standard in its current form would result in opportunities to provide comprehensive guidance being missed. The adoption of the current incomplete and in some cases ambiguous text may preclude further work on this important standard for a number of years, since it would first have to be added to the work programme, and it is unlikely that there would be much support for this in the near term. It is likely that significant quantities of information relating to bark will be received very soon and that, therefore, significant improvements to this draft standard could be realized in the near future if this draft text remains open and designated as high priority on the work programme. During the country consultations on this text in 2006, Canada raised several concerns relating to how the text

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						could be interpreted in a manner that implied that the risks related to given percentages of remaining bark were known. This is not yet the case, and further scientific information is required to clarify the situation. Concerns also existed, and were communicated, that any text on bark removal could encourage its use internationally, before risk factors relating to bark and bark size were fully clear. Since work has now commenced on elucidating the relationship between risks and bark size, an opportunity exists to capitalise on this by retaining the text in draft format and further developing its provisions and guidance. Moving ahead with a supplement at this stage will prevent realization of this objective. Analysis of the current text reveals several ambiguities, and a lack of specific guidance, accompanied by the continued possibility to interpret and apply the standard in ways not consistent with IPPC objectives and existing standards. Furthermore, given the goals of protecting plant resources and harmonizing phytosanitary measures internationally, Canada feels that this draft text will fail on both counts. This text could result in *de facto* tolerances for bark on various wood products, with such tolerances being derived not from any risk factors but simply from an assessment of volumes of bark commonly remaining after commercial debarking processes. Currently it is clear that the available technical information on the risks associated with bark on wood remains insufficient to support adoption of a standard that provides certain information on this subject. Moving ahead with this standard while there are such information gaps creates potential problems in that its provisions could conflict with subsequent findings and guidelines (e.g., revision to ISPM No. 15), or that an opportunity could be lost to provide useful information on a key aspect (e.g., risk related to bark size). Additional information should be gathered by the Technical Panel on Forest Quarantine and, as appropriate, the International Forest Quarantine Research Group (IFQRG) and analysed. Indeed, a survey related to bark on wood packaging material has been initiated within the sphere of the IPPC (as indicated by CPM document No. 2007/25) with a proposed deadline for completion of May 15th, 2007. Following this analysis, the draft standard should be reviewed and revised as necessary.

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						Since the issue of debarking may be considered to be of primary or least high importance in relation to wood packaging material, and ISPM No. 15 is currently being revised (with a good likelihood of being circulated for consultation in 2008) and may eventually include specific guidance related to acceptable tolerances for adhering bark, it is essential to await both the current collection of associated data and finalization of the related text of ISPM No. 15. In addition, this draft text does not make it clear whether or not it applies to wood packaging material, presenting a strong possibility that some countries may use this standard in relation to such products, while others may consider such use and linkage invalid. Canada suggests that the standard-setting work programme should assign high priority to the completion of both the revision of ISPM No. 15 and this standard on debarked and bark-free wood (and the objective could be that both texts are circulated for consultation at the same time). Canada supports the development of standards which are clear, robust (with sufficient technical support) are practically applicable and will assist in protection of plant resources. For information on Canada's concerns, significant problems that Canada has noted within the draft text are presented below. This information is presented for consideration in the ongoing work on this text, and should not be seen as support for a revised version of this text to be considered at CPM-2. The extent of work to be carried out will require significant changes, such changes will necessitate further consultation, and it remains necessary to harmonise the provisions of this standard with ISPM No. 15.
5.	***GENERAL COMMENTS***	Norway	Editorial		Some places in the text the phrase "**Importing NPPO require**" is used. Would it be more correct to say "NPPO's of importing countries require"? Other places the phrase "**Contracting parties require"** is used. What is the reason for this distinction?	

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
6.	**1. Scope**	European Commission and its 27 member states (hereafter EC + 27 MS)	Editorial/ Technical	Para 2	~~These guidelines do~~ **This supplement does** not specifically consider the effectiveness **or technical justification** of other measures in combination with the removal of bark~~, nor do they provide technical justification for them.~~	1. To be in line with supplement 2. Simpler and more focus
7.	***Definitions***	USA	Technical	Bark-free wood	Wood from which "almost" all bark, except….	If we accept this definition, we need to amend it. Zero tolerance is not achievable in practice. The original standard for bark-free allowed for small patches of bark no larger than a credit card. The present definition permits no tolerance, which is not acceptable.
8.	**3. Background**	Australia	editorial	2nd para sentence 1	~~Some~~ NPPOs ~~apply a requirement for~~ **may require** debarked or bark-free wood as a phytosanitary measure.	Slightly better expression.
9.	**3. Background**	Australia	editorial	2nd para sentence 2	~~Different interpretations by NPPOs of what constitutes debarked and bark-free wood~~ **Inconsistent application of the definitions for debarked and bark free wood by NPPOs** may have an impact on the international trade in wood.	Slightly better expression.
10.	**3. Background**	Norway	Editorial	Para 3	Move to Scope, after para 1	More logically placed here
11.	**4. General Requirements**	Canada	Substantive	Entire section	The text in this section is problematic in that the references to 3 percent of bark remaining on coniferous logs and up to 10 percent of bark from non-coniferous species will result in *de facto* tolerances being applied, possible to wood packaging material.	Additional information on this subject should be gathered by or for the Technical panel on Forest Quarantine and analysed before completion and adoption of this supplement. Work is currently underway within the IPPC to determine conclusively the relationship between phytosanitary risks and bark size. It appears, however, that the text relating to 3 percent of bark remaining on coniferous logs and up to 10 percent of bark from non-coniferous logs after normal industrial debarking processes, was derived largely as a result of assessing volumes of bark remaining after common commercial debarking practices (i.e., without any relationship to phytosanitary risk being determined). A number of factors may influence the percentage of bark remaining after wood has gone through an industrial debarking process (species, type of material, growth patterns, machinery, even ambient temperature during debarking, etc.). In addition, these tolerances are believed to relate solely to round wood/logs; if such

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						tolerances were applied to sawn wood or wood packaging material, the context would be completely different from that originally discussed. Although the standard does indicate these percentages in relation to logs, their publication could lead to their use as *de facto* tolerances for other products, e.g., wood packaging material. For any such tolerances, (which could have a profound impact on trade) the basis must have firm, demonstrable foundations, and the guidance must have a clearly defined scope in terms of applicable products.
12.	**4. General Requirements**	Australia	editorial	para 2 sentence 1	Debarking using conventional industrial procedures ~~usually~~ does not **usually** remove all of the bark from logs.	Slight reworking of sentence
13.	**4. General Requirements**	Japan	substantive	Para 2, sentence 3	However, it is generally recognized that ~~up to 3 percent of bark from coniferous logs and up to 10 percent of bark from non-coniferous logs~~ bark may remain after normal industrial debarking processes~~.~~	Scientific evidences which support the proposed figures, that is, "3 percent" and "10 percent" should be presented. As long as any scientific data is not shown, strikeout part should not be included in this standard.
14.	**4. General Requirements**	USA	Technical	Second paragraph, last sentence	References to percentages of bark should be eliminated and bark limitations should be to a referenced size	Percentages are not as concrete as a universally known object thus it is subject to interpretation by the enforcing official. More concrete examples will be easier to enforce and bring more consistency to the process. Allowing a percentage of bark could permit a phytosanitary risk on some large pieces. This should be reconsidered because of the very large variation of wood sizes.
15.	**4. General Requirements**	Australia	editorial	para 3 sentence 1	**For** ~~In terms of~~ this standard, ingrown bark around knots...	Slight reworking of sentence
16.	**4. General Requirements**	Norway	technical	Para 3, sentence 1	In terms of this standard, completely ingrown bark around knots (i.e. areas ….	Bark remnants around knots that have not been completely encased during annual growth may easily be left during the debarking process and these may represent a risk.
17.	**4. General Requirements**	USA	Technical	4th. paragraph	Delete the whole paragraph	There are no guidelines for bark on ISPM 15.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
18.	4.1 Reduction of pest risk associated with bark	USA	Technical	Whole Section	Delete the whole section	This section is from the draft that went out for country consultation. It deals with risk associated with bark and was advisory in nature. It was intended to be used in the stand-alone standard. It is not appropriate for a Glossary supplement since the supplement should only deal with an explanation of debarking and bark free. Therefore, this should be deleted.
19.	4.1 Reduction of pest risk associated with bark	Australia	editorial	para 1 sentence 1	Removal of bark may reduce **potential phytosanitary risks** ~~the phytosanitary risk~~ from some insects…	Slight reworking of sentence
20.	4.1 Reduction of pest risk associated with bark	Australia	**substantive**	para 1 new sentence at end of para	**Removal of bark and any associated cankers may reduce the risks presented by some pathogens and decay organisms. Removal of bark can speed up drying of nutrient rich outer layers of the wood and alter microclimatic conditions at the bark-wood surface interface leading to fungistatic conditions and reduced sporulation opportunity.**	The existing text is solely focussed on reducing risks associated with insects. It makes no mention that the presence of bark elevates risks associated with some pathogens and decay organisms.
21.	4.1 Reduction of pest risk associated with bark	Norway	technical	Para 2	When determining import requirements for wood products, contracting parties should take into account that certain production processes may eliminate pest risks associated with bark.	It is not clear which processes this sentence refers to. The risk reduction effect of different processes would probably vary (from completely elimination of risk to lower effects) It could be helpful if examples are added.
22.	4.1 Reduction of pest risk associated with bark	Australia	**substantive**	para 2 sentence 1	When determining import requirements for wood products, contracting parties should take into account that certain production processes eliminate pest risks associated with bark **(e.g....)**.	This sentence could benefit from the inclusion of some examples.
23.	4.1 Reduction of pest risk associated with bark	Australia	editorial	para 3 sentence 1	... residual bark that remains after debarking may present a **phytosanitary** risk.	clarifies risk
24.	4.1 Reduction of pest risk associated with bark	Japan	substantive	Para 3, sentence 2	Although many pest risks are reduced by debarking, in some cases the residual bark that remains after debarking may present a risk. In such cases ~~other~~ additional phytosanitary measures may be required. One of these, based on technical justification, may be a requirement that the wood be bark-free.	Bark-free is a status achieved by debarking.

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25.	4.2 Basis for regulating	Canada	Substantive	Second paragraph Final paragraph	The second paragraph can be interpreted to conflict with the information on origin contained in ISPM No. 15 (section 1), yet no text is presented to ensure that a distinction is maintained between the two standards. The final paragraph promotes the use of removal of bark under certain conditions and is another example of problematic text. The paragraph goes on to explain that removal of bark may be more efficacious when combined with other measures, leading to possible interpretations of conflicts with the 'Scope' section which clearly states that the guidelines do not specifically consider the effectiveness of other measures in combination with the removal of bark, nor provide technical justification for them.	The possible conflicts between this standard and ISPM No. 15, and the possibility of creating further ambiguities in relation to ISPM No. 15, in both its current and potential forms, are of distinct concern. To avoid this, the TPFQ should finalise both texts in concert. Regarding the final paragraph: Canada is not aware of scientific evidence yet collected or analysed by either the TPFQ or IFQRG that demonstrating a synergistic response related to bark removal, or otherwise firmly supporting text making reference to bark removal being used in combination with other measures. Additional information on this subject should be obtained by/for the Technical panel on Forest Quarantine in conjunction with the International Forest Quarantine Research Group (IFQRG) as appropriate and should be analysed before such guidelines are prepared.
26.	4.2 Basis for regulating	USA	Technical	Last paragraph	Delete	This should be reviewed by the TP. We would advise a delay in the approval of the DB and BFW supplement until studies by the IFQRG are completed.
27.	4.2 Basis for regulating	EC + 27 MS	Editorial	Para 3 2nd sentence	~~Its use~~ **Removal of bark** may be limited to……	Clearer
28.	4.2 Basis for regulating	Norway	Editorial	Para 3, sentence 2	Its use as a phytosanitary measure may be limited to …	Clearer meaning
29.	4.2 Basis for regulating	Australia	**substantive**	para 3 sentence 2	Its use ~~may be limited to certain times of the year, based on the period of emergence of pests in relevant exporting countries and further processing in the importing country, or~~ may be combined with other measures where removal of bark is not sufficient to manage the phytosanitary risk when used alone.	The original text is only relevant for the insects. It is not relevant to risks associated with pathogens and decay organisms.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
30.	4.2 Basis for regulating	Argentina, Bolivia, Brazil, Chile, Paraguay, Uruguay, COSAVE	Technical	3rd para	Based on technical justification the removal of bark may be considered a sufficient phytosanitary measure where it is significantly effective against pests that are dependent on bark for some or all stages of their life cycle. Its use may be limited to certain times of the year, based on the period of emergence of regulated pests in ~~relevant~~ exporting countries and further processing in the importing country, or may be combined with other measures where removal of bark is not sufficient to manage the phytosanitary risk when used alone.	It is associated to the pest risk and not to the relevance of the exporting country. The key issue is the emergence of regulated pests and not of any pests.
31.	5.1 Bark tolerances for debarked wood	USA	Technical Substantive	Whole section Whole section		We would advise a delay in the approval of this supplement until studies by the IFQRG are completed. This section does not give a clear guideline on what tolerances are permitted for debarked wood. Tolerance of bark should be based on area, not on percentages.
32.	5.1 Bark tolerances for debarked wood	Australia	**substantive**	para 1 new dash points	**- the presence of cankers and blue stain fungi associated with the bark**	These words are suggested to give some emphasis to the risk presented by pathogens and other fungi of economic importance.
33.	5.1 Bark tolerances for debarked wood	Japan	Substantive	Para 2	~~Where contracting parties require debarked wood as a phytosanitary measure based on technical justification without specifying a tolerance level of residual bark, they should expect that up to 3 percent of bark from coniferous logs and up to 10 percent of bark from non-coniferous logs may remain after normal industrial debarking processes. For sawn wood, the percentage of residual bark mentioned above should relate only to that part of the wood that has kept its natural round surface.~~	Scientific evidences which support the proposed figures, that is, “3 percent” and “10 percent” should be presented. As long as any scientific data is not shown, these sentences should not be included in this standard.
34.	5.1 Bark tolerances for debarked wood	Norway	Editorial	Para 2, sentence 1	Where contracting parties require debarked wood as a phytosanitary measure ~~based on technical justification~~ without specifying…..	Para 1 already specifies that debarking requirements should be technically justified.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
35.	5.1 Bark tolerances for debarked wood	EC + 27 MS	Technical/ substantial	Para 2 1st sentence	Where contracting parties require debarked wood as a phytosanitary measure based on technical justification without specifying a tolerance level of residual bark, they should ~~expect~~ **accept** that up to 3 percent of bark from coniferous logs and up to 10 percent of bark from non-coniferous logs may remain after normal industrial debarking processes.	More focus and clearly express what is meant by the sentence
36.	5.1 Bark tolerances for debarked wood	USA	Technical	Last paragraph, first sentence	References to percentages of bark should be eliminated and bark limitations should be to a referenced size	Percentages are not as concrete as a universally known object thus it is subject to interpretation by the enforcing official. More concrete examples will be easier to enforce and bring more consistency to the process. Allowing a percentage of bark could permit a phytosanitary risk on some large pieces. This should be reconsidered because of the very large variation of wood sizes. Large pieces of wood with 10% remaining bark could potentially pose a higher risk than a very small piece of wood. We suggest that debarking should be restricted to a surface area containing bark no larger than a specified size. The amount of bark tolerated should be based on the risk posed by that wood. In addition, since the percentage only relates to the remaining rounded surface, 3% of a small rounded surface area would result in rejection due to a tiny piece of bark. That is not acceptable. The 3% and 10% levels used for logs do not rationally apply to lumber. These percentages only relate to the amount of bark remaining on a log after mechanical debarking. These percentages do not address pest risk. A 10% tolerance for hardwood implies that this type of wood is less risky. That may not be the case. This would be better addressed in a size tolerance like was used in the original draft standard.
37.	5.1 Bark tolerances for debarked wood	USA	Technical	Last paragraph, last sentence	Delete	Measurement of bark is restricted to the curved surface and gives no credit for removal of bark by sawing and therefore does not meet the definition of debarked.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
38.	5.1 Bark tolerances for debarked wood	Canada	Technical Technical	Last paragraph Last paragraph, last sentence	The text in this section is problematic in that the references to 3 percent of bark remains on coniferous logs and up to 10 percent of bark from non-coniferous species will result in *de facto* tolerances being applied, particularly given the title of the section and the preceding text. The text referring to natural round surface of the wood creates the potential for restrictions and for potential confusion in relation to certain commodities if only a very small portion of a piece of wood contains a natural round surface and that natural round surface contains bark. Additional provisions and clarifications relating to such cases should be presented in the text.	Additional information on this subject should be gathered by or for the Technical panel on Forest Quarantine and analysed before completion and adoption of this supplement. In relation to the 3 and 10 % tolerances, the comments made above in relation to section 4, *General Requirements*, also apply here. The subject and title of this section presents a strong probability that such tolerances would be applied in different contexts from that originally intended: i.e., perhaps to sawn wood and/or to wood packaging material rather than or as well as logs.
39.	5.2 Bark-free wood as a phytosanitary measure	USA	Technical Substantive	Whole section Whole section		We would advise a delay in the approval of the supplement until studies by the IFQRG are completed. Zero tolerance is not practically achievable. A tolerance based on size is more practical and enforceable by NPPOs. We need to provide tolerances based on area.
40.	5.2 Bark-free wood as a phytosanitary measure	Australia	**Substantive**	para 1 sentence 1	In cases where even small pieces of bark may present a **phytosanitary** risk, NPPOs may require that…..	clarifies risk

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
41.	5.2 Bark-free wood as a phytosanitary measure	Argentina, Bolivia, Brazil, Chile, Paraguay, Uruguay, COSAVE	Substantial	1st para , 2nd bullet	In cases where even small pieces of bark may present a risk, NPPOs may require that the wood be bark-free as a phytosanitary measure, based on technical justification. These cases may include: - where a risk for a specific pest is identified and can be eliminated by complete removal of the bark - when wood is subject to the application of another measure and that measure is insufficient to mitigate the risks sourcing from ~~eliminate relevant pest risks~~ regulated pests associated with bark, including re-infestation - where the presence of bark may reduce the efficacy of another measure required to mitigate pest risks from pests within the cambial layer. Where importing NPPOs require that wood be bark-free, the commodity should not retain any visible indication of bark.	It must be clear that the risks to be mitigated are associated only with regulated pest. The concept of "relevant risks " is not clear and must be avoided.
42.	5.2 Bark-free wood as a phytosanitary measure	Australia	**Substantive**	para 1 2nd dash point	when wood is subject to the application of another measure and that measure is insufficient to elelimate relevant pest risks associated with bark, ~~including re-infestation~~ **including infestation after the application of a measure**	The use of the term 're-infestation' implies that a pest was there before another measure was applied and then eradicated by the measure. Post treatment infestation is suggested as more appropriate as it implies less about the previous association of a pest with the wood.
43.	5.2 Bark-free wood as a phytosanitary measure	EC + 27 MS	Technical	Para 1 2nd indent	when wood is subject to the application of another measure and that measure is insufficient to eliminate relevant pest risks associated with bark, including ~~re-infestation~~ **post treatment infestation**	More explicit and explains indent
44.	5.2 Bark-free wood as a phytosanitary measure	Norway	Substantial	Para 2	(delete or rephrase in accordance with definition of bark-free wood)	The text seems inconsistent with the definition of bark-free wood (relating to ingrown bark and bark pockets between rings of annual growth)
45.	5.2 Bark-free wood as a phytosanitary measure	Australia	**Substantive**	para 2	..., the commodity should not retain any ~~visual indication of~~ bark that is detectable through visual examination.	"Visual examination" is a defined term and I think what they are trying to say here.

	1. Section	2. Country	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
46.	5.2 Bark-free wood as a phytosanitary measure	Canada	Technical	Last paragraph	Zero tolerance for bark on bark free wood is generally considered unachievable by commercial practices (except for fully square sawn wood). Therefore, the last sentence may result in problematic situations at points of inspection, especially related to wood packaging material, and this part of the standard requires much more thought and work.	The risks associated with small pieces of bark should be thoroughly quantified by the TPFQ before adopting a standard on debarked and bark free wood. To proceed with provisions such as this in a situation of incomplete information is fraught with potential problems.