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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 | Продовольственная и сельскохозяйственная организация Объединенных Наций | Organización de las Naciones Unidas para la Alimentación y la Agricultura

COMMISSION ON PHYTOSANITARY MEASURES

Seventh Session

Rome, 19 - 23 March 2012

Compiled member comments on: Draft ISPM *Integrated measures for the production of plants for planting in international trade*

Agenda item 8.1.2 of the Provisional Agenda

1. The Secretariat compiled a total of 152 member comments received 14 days prior to CPM-7 on the draft ISPM *Integrated measures for the production of plants for planting in international trade*, presented to the CPM-7 as document CPM 2012/04/Attachment01, from the following 26 members:

Argentina
Armenia
Australia
Azerbaijan
Belarus
Bolivia (Plurinational State of)
Brazil
Burkina Faso
Canada
Chile
China
COSAVE
Costa Rica
EPPO
European Union and its 27 Member States
Gabon
Japan
Korea, Republic of
Mali
Norway
Paraguay
Peru
Singapore
Togo
United States of America
Uruguay

COMPILED MEMBER COMMENTS - 14 DAYS PRIOR TO CPM-7

Draft ISPM *Integrated measures for the production of plants for planting in international trade*

(CPM 2012//04/Attachment01)

Com. #	Para #	Comment type	Comment	Explanation	Country
1.	G	Substantive		The draft title refers to integrated measures for the production of plants for planting in international trade. It is expected that this draft provides guidelines for pest risk management of plants for planting during the production of these plants that are intended for international trade. The draft provides guidance only for one risk management option which is the use of "integrated measures", a term not defined in the framework of the IPPC and can be confused with others adopted terms, despite the modifications performed in the previous draft. Two levels of integrated measures are established in this draft, one general and another for higher risk situations, based on identified risks, stating that it may not be necessary to require all these elements according to production systems, not being these systems by itself a pest risk management option to meet the phytosanitary requirements of the importing country. The paragraphs under Outline of Requirements should be in line with the text of the draft standard, and therefore it should be reworded as a summary of the draft. For example, paragraph 12 of Outline of requirements does not reflect the content of the draft text and paragraph 13 refers to "pest risk assessment" which is not mentioned along the draft.	COSAVE Uruguay Argentina Chile Brazil Peru
2.	G	Substantive		While laying down rules for the production of planting material and ensure the same phytosanitary status, makes a mixture of	Costa Rica

Com. #	Para #	Comment type	Comment	Explanation	Country
				factors that are merely of pest risk analysis (Annex 1). In addition, rules on an implicit risk and not being established by the risk of pests that may have certain plant. Risk management should not be part of the standard, already considered as part of the risk analysis in standard 11.	
3.	G	Substantive		The draft title refers to integrated measures for the production of plants for planting in international trade. It is expected that this draft provides guidelines for pest risk management of plants for planting during the production of these plants that are intended for international trade. The draft provides guidance only for one risk management option which is the use of "integrated measures", a term not defined in the framework of the IPPC and can be confused with others adopted terms, despite the modifications performed in the previous draft. Two levels of integrated measures are established in this draft, one general and another for higher risk situations, based on identified risks, stating that it may not be necessary to require all these elements according to production systems, not being these systems by itself a pest risk management option to meet the phytosanitary requirements of the importing country. Draft contains disorder in the sequence of some texts and repetition of concepts, e.g., item 2.2.1.5 is already included in para 53. Some elements are included both under general measures and higher risk situation (e.g., para 35 is repeated in para 49) Para 72, 73 and 76 describes two types of non-conformities and no examples are given in Appendix 2.	Paraguay Bolivia Brazil
4.	G	Substantive		Suggest that this document simply refer to measures for plants for planting, or administrative proceducres for plants for	United States of America

Com. #	Para #	Comment type	Comment	Explanation	Country
				planting. The document provides almost no guidance on actual measures (except in the appendix); and particularly does not provide any guidance on how to actually integrate measures. Furthermore, "integrated measures" is not a defined term in the glossary and has no real meaning in the standard. Therefore, throughout the entire document we suggest removing reference to "integrated measures" and refering only to "measures". In addition, the standard focuses a lot on producers. While producers have responsibility to execute certain requirements, it is the NPPO of the exporting country that is responsible for ensuring requirements are met. ISPMs do not apply to producers -- ISPMs apply to NPPOs. Therefore language related to producers in the draft should be modified to emphasize that it is the NPPO of the exporting country that is responsible for putting in place measures and ensuring requirements of importing country are met.	
5.	G	Sustantivo		Si bien se establece reglas para la producción de material propagativo y asegurar la condición fitosanitaria del mismo, hace una mezcla de factores que son meramente del análsis de riesgo de plagas, Ej. Anexo1. Además, se esta normando sobre un riesgo implicito y no por el riesgo de una plaga que pueda tener determinada planta. El manejo de riesgo no debe formar parte de la norma, ya se considera como parte del Análisis de Riesgo en la Norma 11.	Costa Rica
6.	1	Substantive	**INTEGRATED MEASURES FOR ~~THE PRODUCTION OF~~ PLANTS FOR PLANTING IN INTERNATIONAL TRADE**	Integrated measures described in this draft are not for the production but for pest risk management during the production of PFP destined to international trade at the place of production. Title was simplified because this concept is in the Scope.	Argentina Paraguay COSAVE Uruguay Bolivia Chile Peru

Com. #	Para #	Comment type	Comment	Explanation	Country
					Brazil
7.	1	Substantive	**INTEGRATED MEASURES FOR THE PRODUCTION OF PLANTS FOR PLANTING IN INTERNATIONAL TRADE**	Shorten the title, since it is not necessary to mention that they are in international trade since standards are international.	Costa Rica
8.	1	Substantive	**Guidelines ~~INTEGRATED MEASURES~~ FOR THE PRODUCTION and movement OF PLANTS FOR PLANTING IN INTERNATIONAL TRADE**	This standard does not really provide guidance on measures; it really discusses administrative procedures to be used for the production and movement of plants for planting. Measures are covered in the appendix but the appendix is not part of the standard; therefore the title should be changed to reflect the content of the document	United States of America
9.	1	Sustantivo	**MEDIDAS** INTEGRADAS PARA LA PRODUCCIÓN DE PLANTAS ~~PARA PLANTAR EN EL COMERCIO INTERNACIONAL~~	Acortar el título, por cuanto no es necesario mencionar que son para el comercio internacional puesto que las normas son internacionales.	Costa Rica
10.	5	Substantive	This standard outlines the main criteria for the identification and application of integrated measures to manage pest risk at the place of production for the production of plants for planting (excluding seeds) for international trade. It provides guidance to help identify and manage pest risks associated with plants for planting as a pathway.	To clarify according to the proposed title.	COSAVE Uruguay Argentina Paraguay Bolivia Chile Peru Brazil
11.	6	Substantive	**References**	Add references to ISPMs No. 4, 10 and 14 since these are relevant to measures for plants for planting	United States of America
12.	7	Editorial	**ISPM 2.** 2007. *Framework for pest risk analysis*. Rome, IPPC, FAO. **ISPM 5**. Glossary of phytosanitary terms. Rome, IPPC, FAO. **ISPM 11**. 2004. Pest risk analysis for quarantine pests, including analysis of environmental risks and living modified organisms. Rome, IPPC, FAO. **ISPM 12**. 20~~0~~11. ~~Guidelines for p~~Phytosanitary certificates. Rome, IPPC, FAO. **ISPM 13**. 2001. Guidelines for the notification of non-compliance and emergency action. Rome, IPPC, FAO. **ISPM 17.** 2002. *Pest reporting.* Rome, IPPC, FAO.	ISPM 11: A comma is missing between "pests" and "including". ISPM 12: This standard has been revised in 2011.	Armenia

Com. #	Para #	Comment type	Comment	Explanation	Country
			ISPM 20. 2004. Guidelines for a phytosanitary import regulatory system. Rome, IPPC, FAO. **ISPM 21**. 2004. Pest risk analysis for regulated non-quarantine pests. Rome, IPPC, FAO. **ISPM 24**. 2005. Guidelines for the determination and recognition of equivalence of phytosanitary measures. Rome, IPPC, FAO. **ISPM 32**. 2009. Categorization of commodities according to their pest risk. Rome, IPPC, FAO.		
13.	8	Substantive	**定 义建议在植物检疫术语表中增加“综合措施(integrated measures)”的解释** **Add the term of “integrated measures” and definition.**	**在第5号**标准术语中没有该词汇的解释，在植物保护工作中经常用到**“有害生物**综合治理（IPM）**”的概念，意思相近，但要达到的目**标不一样，为避免混淆，体现植物检疫综合措施的特殊性，有必要进行区分。 There isn't the term of "integrated measures". The conception of "integrated measures" is similar with the term of IPM. But the goal of “integrated measures” is different with IPM for the specialties of phytosanitary integrated measures. So, adding this term is necessary.	China
14.	10	Substantive	**Outline of requirements**	The paragraphs under this title should be in line with the text of the draft standard, and therefore it should be reworded as a summary of the draft. For example, paragraph 12 of Outline of requirements does not reflect the content of the draft text and paragraph 13 refers to "pest risk assessment" which is not mentioned along the draft.	COSAVE Uruguay Argentina Bolivia Peru Chile Brazil
15.	11	Editorial	Plants for plantings are generally considered to pose a higher pest risk than other regulated articles. For many plants for planting integrated measures may be necessary to manage pest risks. Integrated measures may be used to manage the pest risks that plants for planting pose as a pathway for regulated pests and to ensure they meet phytosanitary import requirements. The use of integrated measures involves national plant protection organizations (NPPOs) as well as producers1, and relies on pest risk management measures applied throughout the production and distribution processes.	Footnotes should be on the same page as the reference in text, not at the end of the standard at para 135. See previously published ISPMs eg ISPM 18	Australia
16.	11	Editorial	Plants for plantings are generally considered to pose a higher pest risk than other regulated articles. For many plants for planting integrated measures may be necessary to manage	no "s"	United States of

Com. #	Para #	Comment type	Comment	Explanation	Country
			pest risks. Integrated measures may be used to manage the pest risks that plants for planting pose as a pathway for regulated pests and to ensure they meet phytosanitary import requirements. The use of integrated measures involves national plant protection organizations (NPPOs) as well as producers1, and relies on pest risk management measures applied throughout the production and distribution processes.		America
17.	11	Substantive	Plants for plantings are generally considered to pose a higher pest risk than other regulated articles. ~~For many plants for planting integrated measures may be necessary to manage pest risks~~. Integrated measures may be used to manage the pest risks that plants for planting pose as a pathway for regulated pests and to ensure they meet phytosanitary import requirements. The use of integrated measures involves national plant protection organizations (NPPOs) as well as producers1, and relies on pest risk management measures applied throughout the production and distribution processes.	Deleted sentence gives the idea that the integrated measures are the only option to manage pest risk.	Paraguay Brazil Peru
18.	12	Substantive	Integrated measures may be developed and implemented where specifically required by the NPPO of an importing country~~, or where the NPPO of the exporting country deems such measures to be effective~~ to meet phytosanitary import requirements. General integrated measures may include requirements such as keeping a plan of the place of production, examination of plants, keeping records, treating pests and sanitation. Where the risk identified justifies the use of additional integrated measures, additional elements such as a place of production manual including a pest management programme, appropriate training for personnel, specific packing and transportation requirements, and internal and external audits may be required.	Only the NPPO of the importing country can deem that measures are effective in meeting phytosanitary import requirements. The NPPO of an exporting country can propose and provide evidence of equivalence	Australia
19.	12	Substantive	Integrated measures may be developed and implemented by the NPPO of the exporting country where specifically required by the NPPO of an importing country, or where the NPPO of the exporting country deems such measures to be effective to meet phytosanitary import requirements. General integrated measures may include requirements such as keeping a plan of the place of production, examination of plants, keeping records, treating pests and sanitation. Where the risk identified justifies the use of additional integrated measures, additional elements such as a place of production manual including a pest management programme, appropriate training for personnel, specific packing and transportation requirements, and internal and external audits may be required.	Integrated measures described in this draft are implemented by the NPPO of the exporting country	Paraguay
20.	13	Editorial	The NPPO of the exporting country should provide adequate information to the NPPO of the importing country to support the pest risk assessment, approve and oversee places of production using integrated measures, and inspect plants and issue phytosanitary certificates that attest to the consignment as meeting the phytosanitary requirements of the importing country. The NPPO of the importing country should clearly communicate its phytosanitary import requirements to NPPO of exporting countries and their importers.~~.~~	For clarity.	Singapore
21.	15	Substantive	Several ISPMs provide general guidance on pest risk management (e.g. ISPM 2:2007,	The PRA concludes with the identification of	COSAVE

Com. #	Para #	Comment type	Comment	Explanation	Country
			ISPM 11:2004, ISPM 21:2004, ISPM 32:2009). The conclusions from pest risk analyses (PRAs) should be used to decide the ~~appropriate~~ phytosanitary measures to reduce the pest risk to an acceptable level for the importing country.	phitosanitary measures. Measures based on PRA are supposed to appropriate and technically justified	Uruguay Paraguay Bolivia Chile Peru Brazil Argentina
22.	16	Editorial	Plants for planting are generally considered to pose a higher pest risk than other regulated articles and therefore additional specific guidance on pest risk management is needed to ~~meet~~ help address this higher pest risk.	Better wording.	EPPO Norway European Union Belarus Armenia Azerbaijan
23.	16	Substantive	Plants for planting are generally considered to pose a higher pest risk than other regulated articles and therefore additional specific guidance on pest risk management is needed to meet this higher pest risk.	this is already stated in paragraph 11	United States of America
24.	17	Editorial	Integrated measures may be used at places of production to manage the risk of regulated pests, especially those that are difficult to detect ~~based on~~ during import or export inspections because:	For clarity	Singapore
25.	18	Substantive	• some pests do not have distinct visual symptoms, particularly at low pest incidence • symptoms of infestation may be latent or masked at the time of inspection (e.g. as a result of pesticide use, nutrient imbalances, dormancy of plants at time of dispatch, presence of other non-regulated pests or by removal of symptomatic leaves) • Small size insects or eggs may hide under bark or scales of buds etc. • the type of packaging, size and physical state of the consignment can influence the effectiveness of inspection • alternative or supplementary detection methods for many plant pests, particularly pathogens, may not be available.	Small size insects or eggs under bark or inside buds etc. are hard to be inspected.	Korea Republic of
26.	18	Substantive	• some pests do not have distinct visual symptoms, particularly at low pest incidence • symptoms of infestation may be latent or masked at the time of inspection (e.g. as a result of pesticide use, nutrient imbalances,	For clarity. The symptoms could be masked by dormant or immature state of plants at the time of dispatch.	Singapore

Com. #	Para #	Comment type	Comment	Explanation	Country
			~~dormancy~~ dormancy and immaturity of plants at the time of dispatch, presence of other non-regulated pests or by removal of symptomatic leaves) • the type of packaging, size and physical state of the consignment can influence the effectiveness of inspection • alternative or supplementary detection methods for many plant pests, particularly pathogens, may not be available.		
27.	18	Technical	• some pests do not cause ~~have~~ distinct visual symptoms, particularly at low pest incidence • symptoms of infestation may be latent or masked at the time of inspection (e.g. as a result of pesticide use, nutrient imbalances, dormancy of plants at time of dispatch, presence of other non-regulated pests or by removal of symptomatic leaves) • the type of packaging, size and physical state of the consignment can influence the effectiveness of inspection • ~~alternative or supplementary~~ detection methods for many ~~plant~~ pests, particularly pathogens, may not be available.	To clarify what produce the symptoms. It is important to mention the availability of detection methods and not if they are alternative or supplementary. Moreover it is not clear if the detection methods are alternative or supplementary to inspection or to the other detection methods.	COSAVE Uruguay Argentina Paraguay Bolivia Chile Peru Brazil
28.	19	Editorial	Using integrated measures for pest risk management may provide an alternative to import restrictions, such as prohibition or post-entry quarantine to meet the phytosanitary import requirements. The application of integrated measures for pest risk management requires not only the participation of the NPPO of the exporting country but also the participation of producers throughout all the stages of production of the plants for planting.	provides clarity as restrictions include prohibitions, but also provides a broader meaning	Canada
29.	19	Substantive	The use of~~Using~~ integrated measures for pest risk management may be equivalent to other phytosanitary measures ~~provide an alternative to import prohibition or post-entry quarantine to meet the phytosanitary import requirements~~. The application of integrated measures for pest risk management requires not only the participation of the NPPO of the exporting country but also the participation of producers throughout all the stages of production of the plants for planting.	Integrated measures may be considered as options to other measures. According to ISPM 24 equivalence may be applied to a combination of measures such as the integrated measures described in this draft.	COSAVE Uruguay Argentina Bolivia Peru Chile Brazil
30.	19	Substantive	Using integrated measures for pest risk management may provide an alternative to import prohibition, ~~or~~ post-entry quarantine or repeated rejection or fumigation to meet the phytosanitary import requirements. The application of integrated measures for pest risk management requires not only the participation of the NPPO of the exporting country but	Repeated rejection or fumigation can cause problems especially in plants for planting because they can be dried or devitalized.	Korea Republic of

Com. #	Para #	Comment type	Comment	Explanation	Country
			also the participation of producers throughout all the stages of production of the plants for planting.		
31.	19	Substantive	Using integrated measures for pest risk management may be equivalent to other phytosanitary measures ~~provide an alternative to import prohibition or post-entry quarantine to meet the phytosanitary import requirements~~. The application of integrated measures for pest risk management requires not only the participation of the NPPO of the exporting country but also the participation of producers throughout all the stages of production of the plants for planting.	Integrated measures may be considered as options to other measures. According to ISPM 24 equivalence may be applied to a combination of measures such as the integrated measures described in this draft.	Paraguay
32.	19	Substantive	Using integrated measures for pest risk management may provide an alternative to import prohibition or post-entry quarantine to meet the phytosanitary import requirements. The application of integrated measures for pest risk management requires not only the participation of the NPPO of the exporting country but also the participation of producers throughout all the stages of production of the plants for planting.	This paragraph is not very informative and should be deleted. It does not add anything to the document.	United States of America
33.	20	Editorial	Integrated measures are designed to manage the risks related to regulated pests ~~pest risks from regulated pests~~, and also have the advantage of managing other pests at the place of production.	provides clarity for the reader	Canada
34.	20	Editorial	Integrated measures are designed primarily to manage pest risks from regulated pests, and also have the advantage of managing other pests at the place of production.	For clarity	Singapore
35.	21	Editorial	It is expected that the standard will contribute to the protection of biodiversity and the environment by setting up guidelines for the use of integrated measures that will contribute to minimizing international spreading of pests.	Alternative wording for enhanced understanding	Canada
36.	21	Editorial	It is expected that the standard will contribute to the protection of biodiversity and the environment by setting up integrated measures that will contribute to minimizing the international spread~~ing~~ of pests.	Better wording	EPPO Norway European Union Belarus Armenia Azerbaijan
37.	21	Editorial	It is expected that the standard will contribute to the protection of biodiversity and the environment by setting up integrated measures that will contribute to minimizing ~~international spreading~~the spread of pests internationally.	For clarity	Singapore
38.	24	Editorial	The importing country may establish and shall communicate its technically justified phytosanitary import requirements for plants for planting (refer to ISPM 2:2007, ISPM 11:2004 and ISPM 21:2004) to the NPPO of exporting countries. Annex 1 outlines factors to be taken into account when the NPPO of the importing country conducts a PRA	For clarity	Singapore

Com. #	Para #	Comment type	Comment	Explanation	Country
			for plants for planting.		
39.	26	Substantive	• The importing country, in its phytosanitary import requirements, specifies integrated measures to be used in the exporting country. • The importing country does not explicitly require integrated measures to be used, but the NPPO of the exporting country deems that using integrated measures would be a suitable and effective means of achieving the importing country's phytosanitary import requirements and, therefore, decides to specify integrated measures to be applied by producers wishing to export plants for planting to that particular importing country. • The NPPO of the exporting country negotiates bilaterally with the NPPO of the importing country to develop an acceptable integrated measures approach.	The exporting country NPPO cannot force the importing country to accept the integrated measures approach; however, the two countries may negotiate a bilateral agreement as to required measures	United States of America
40.	30	Editorial	This standard describes two main levels of integrated measures. Section 2.1 (General integrated measures) describes a set of integrated measures that are widely applicable to all plants for planting. Section 2.2 (Additional integrated measures in higher pest risk situations) describes additional elements designed to manage pest risks in higher pest risk situations, where appropriate. ~~It may not be necessary to require all these elements. Furthermore, for certain production systems not all elements may be applicable (e.g. physical barriers for field grown plants). Therefore, only some of the elements described in section 2.2 may be appropriate.~~ NPPOs may consider these options in addition to pre-export or port of entry inspections in order to manage pest risks.	"where appropriate" reflects the necessity to be selective or inclusive depending on the situation. Hence, propose to delete the remaining.	Singapore
41.	30	Substantive	This standard describes two main levels of integrated measures. Section 2.1 (General integrated measures) describes a set of integrated measures that ~~are~~ may be widely applicable to all plants for planting. Section 2.2 (Additional integrated measures in higher pest risk situations) describes additional elements designed to manage pest risks in higher pest risk situations. It may not be necessary to require all these elements. Furthermore, for certain production systems not all elements may be applicable (e.g. physical barriers for field grown plants). Therefore, only some of the elements described in section 2.2 may be appropriate. NPPOs may consider these options in addition to pre-export or port of entry inspections in order to manage pest risks.	Measures may be applicable depending on phytosanitary import requirement	Paraguay COSAVE Argentina Uruguay Bolivia Chile Peru Brazil
42.	30	Technical	This standard describes two main levels of integrated measures. Section 2.1 (General integrated measures) describes a set of integrated measures that are widely applicable to all plants for planting. Section 2.2 (Additional integrated measures in higher pest risk situations) describes additional elements designed to manage pest risks in higher pest risk	'Point of entry' is the correct IPPC glossary term.	EPPO Norway Belarus Armenia

Com. #	Para #	Comment type	Comment	Explanation	Country
			situations. It may not be necessary to require all these elements. Furthermore, for certain production systems not all elements may be applicable (e.g. physical barriers for field grown plants). Therefore, only some of the elements described in section 2.2 may be appropriate. NPPOs may consider these options in addition to pre-export or ~~port~~ point of entry inspections in order to manage pest risks.		Azerbaijan
43.	30	Technical	This standard describes two main levels of integrated measures. Section 2.1 (General integrated measures) describes a set of integrated measures that are widely applicable to all plants for planting. Section 2.2 (Additional integrated measures in higher pest risk situations) describes additional elements designed to manage pest risks in higher pest risk situations. It may not be necessary to require all these elements. Furthermore, for certain production systems not all elements may be applicable (e.g. physical barriers for field grown plants). Therefore, only some of the elements described in section 2.2 may be appropriate. NPPOs may consider these options in addition to pre-export or ~~port~~ point of entry inspections in order to manage pest risks.	'Point of entry' is the correct IPPC glossary term.	European Union
44.	32	Substantive	The NPPO of the exporting country may approve a place of production that complies with requirements on general integrated measures described in this standard ~~that are applicable to all types of plants for planting and types of pests~~.	It can not be stated that general integrated measures are applicable to all types of plants for planting and pest. To be consistent with change proposed in paragraph 30. Furthermore it is not necessary to repeat the concept already mentioned in paragraph 30.	COSAVE Uruguay Paraguay Bolivia Argentina Chile Brazil Peru
45.	34	Editorial	The following conditions should be included in ~~form part of~~ the approval process for producers seeking to use the general integrated measures:	adds clarity	Canada
46.	35	Editorial	• maintaining an updated plan of the place of production as well as records of when, where and how plants for planting were produced, treated, stored or prepared for movement from the place of production (including information on all plant species at the place of production and the type of plant material such as cuttings, *in vitro* cultures, bare root plants) • keeping records for three years (or longer, if justified) that verify where and how plants for planting were purchased, stored, produced, distributed and any other relevant information on their plant health status • access to a plant protection specialist with a well-established working knowledge of pest identification and control • designating a ~~person as a~~ contact person for communicating with ~~for~~ the NPPO of the exporting country.	adds clarity	Canada

Com. #	Para #	Comment type	Comment	Explanation	Country
47.	35	Editorial	• maintaining an updated plan of the place of production ~~as well as~~ • keeping records of when, where and how plants for planting were produced, treated, stored or prepared for movement from the place of production (including information on all plant species at the place of production and the type of plant material such as cuttings, *in vitro* cultures, bare root plants) • keeping records for three years (or longer, if justified) that verify where and how plants for planting were purchased, whether local or overseas • stored, produced, distributed and any other relevant information on their plant health status • access to a plant protection specialist ~~with a well-established working knowledge of~~ who is competent in pest identification and control • designating a person as a contact person for the NPPO of the exporting country.	For clarity as a separate point. To add "Whether local or overseas" for clarity.	Singapore
48.	35	Forme	• tenue à jour d'un plan du lieu de production et conservation de données indiquant à quel moment, à quel endroit et selon quelles modalités les végétaux destinés à la plantation ont été produits, traités, entreposés et préparés pour être déplacés du lieu de production (y compris des informations relatives à toutes les espèces végétales présentes sur le lieu de production et au type de matériel végétal: boutures, cultures*in vitro*, végétaux à racines nues toute autre condition qui peut affecter l'apparition de symptômes) • conservation, pendant trois ans (ou plus, si c'est justifié), de dossiers contenant des informations sur le lieu et les modalités d'achat, d'entreposage, de production et de distribution des végétaux destinés à la plantation ainsi que sur leur situation phytosanitaire • accès à un spécialiste de la protection des végétaux ayant de solides connaissances pratiques en matière d'identification des organismes nuisibles et de lutte contre ceux-ci • désignation d'une personne qui fera office de référent pour l'ONPV du pays exportateur.	ajouter dans la parenthèse « toute autre condition qui peut affecter l'apparition des symptômes »	Mali Burkina Faso Togo Gabon

Com. #	Para #	Comment type	Comment	Explanation	Country
49.	37	Editorial	The following elements contrbute to ensure that the plant material meet the ~~may be adequate to meet the~~ phytosanitary ~~import~~ requirements of the importing country:	Initial sentence seems to mean that the elements identified in the bullets may be adequate but may not always ensure that the import requirements are met	Canada
50.	37	Substantive	The following requirements may be adequate for approval of places of production to use general integrated measures ~~to meet the phytosanitary import requirements~~:	This chapeau better describes the content of this section	Argentina COSAVE Uruguay Bolivia Chile Peru Brazil Paraguay
51.	38	Editorial	• conducting visual examinations of plants and places of production by designated personnel as necessary, at appropriate times and according to information and protocols provided by the NPPO of the exporting country • keeping records of all examinations, including a description of pests found and corrective actions taken • taking specific measures where necessary (e.g. to keep the plants free from pests regulated in the country of import ~~destination~~) and documenting these measures • notifying the NPPO of the exporting country if any pests regulated in the country of ~~destination~~import are observed • establishing and documenting a system of sanitation and hygiene.	For consistency.	Singapore
52.	38	Substantive	• conducting visual examinations of plants and places of production by designated personnel as necessary, at appropriate times and according to information and protocols provided by the NPPO of the exporting country • keeping records of all examinations, including a description of pests found and corrective actions taken • taking specific measures where necessary (e.g. to keep the plants free from pests regulated in the country of destination) and documenting these measures • notifying the NPPO of the exporting country if any pests regulated in the	Clarity - need for auditing is addressed later in the text, but should be introduced as soon as posible to reinforce the requirement.	Australia

Com. #	Para #	Comment type	Comment	Explanation	Country
			country of destination are observed • establishing and documenting an auditable system of sanitation and hygiene.		
53.	38	Technical	• 必要时，按照出口国国家植保组织提供的信息及协议，指定适当人员对植株及产地进行~~直观~~检查； • 保存所有检验记录档案，包括介绍所发现的有害生物及所采取的整改措施； • 必要时采取具体措施（如保证植株免受进口国限定的有害生物感染）并对这些措施进行记录存档； • 如观察到进口国限定的任何有害生物，应通知出口国国家植保组织； • 建立一个环境卫生及人员卫生体系，并存档备案。	许多有害生物的症状难以区分，有必要进行必要的室内检验，而且一些生产者具备这样的条件，可以进行进一步的室内检验，没有必要进行限制，去除“**直**观的（visual）”**以后，更加灵活。** Some pests are difficult to distinguish by the sympotom, so it is necessary to inspect in the lab at that monment. besides, some producers have facilities to inspect in the lab. It is flexible after deleting the word “visual”.	China
54.	39	Editorial	Table 1 in Appendix 1 provides ~~specific options for~~ examples of pest management measures related to pest group characteristics that are applicable for most types of plants for planting at places of production.	Consistency with the title of Table 1 (paragraph 127).	EPPO Norway European Union Belarus Armenia Azerbaijan
55.	39	Editorial	Table 1 in Appendix 1 provides examples of ~~specific options for~~ pest management measures related to pest group characteristics that are applicable for most types of plants for planting at places of production.	Table 1 provides examples and not options.	Paraguay COSAVE Uruguay Argentina Bolivia Chile Peru Brazil
56.	42	Fond	Quand les mesures intégrées d’application générale ne sont pas suffisantes pour gérer le risque phytosanitaire, l’ONPV du pays exportateur peut donner son ~~agrément~~ accord à un lieu de production répondant aux exigences de mesures intégrées complémentaires en situation de risque phytosanitaire plus élevé.	remplacer le terme français ‘ agrément’ par « accord »	Mali Burkina Faso Togo Gabon
57.	42	Substantive	Where general integrated measures alone are not sufficient to manage the pest risk, the NPPO of the exporting country may approve a place of production that complies with the	Clarity - it is up to the NPPO of the importing country to determine what measures are	Australia

Com. #	Para #	Comment type	Comment	Explanation	Country
			requirements for additional integrated measures in higher pest risk situations where these measures have been accepted by the NPPO of the importing country.	compliant.	
58.	44	Editorial	Producers applying for approval to use additional integrated measures for higher pest risk situations should develop a place of production manual that includes a pest management programme and relevant information on production practices and operational systems. The NPPO of the exporting country may approve the place of production to export plants to a particular destination when it has determined the integrated measures used meet the phytosanitary import requirements of that country of ~~destination~~import.	Consistency	Singapore
59.	44	Substantive	Producers applying for approval to use additional integrated measures for higher pest risk situations should develop a ~~place of production~~ quality management manual for production that includes a pest management programme and relevant information on production practices and operational systems. The NPPO of the exporting country may approve the place of production to export plants to a particular destination when it has determined the integrated measures used meet the phytosanitary import requirements of that country of destination.	By using the term "quality management manual for production" will better reflect the entire system for pest management, operations and production in achieving quality products that are also pest free. If acceptable, the term should be replaced in the entire document.	Singapore
60.	44	Substantive	Producers applying for approval to use additional integrated measures for higher pest risk situations should develop a place of production manual that includes a pest management programme and relevant information on production practices and operational systems. The NPPO of the exporting country may approve the place of production to export plants to a particular destination when it has determined the integrated measures used meet the phytosanitary import requirements of that country of destination.	Remove references to producers where possible. ISPMs apply to NPPOs, NOT to producers or private entities. The NPPO of the exporting country is the entity responsible for ensuring required measures are met.	United States of America
61.	44	Technical	Producers applying for approval to use additional integrated measures for higher pest risk situations should develop a place of production manual that includes a pest management programme and relevant information on production practices and operational systems. The NPPO of the exporting country may approve the place of production to export specific plants to a particular destination when it has determined the integrated measures used meet the phytosanitary import requirements of that country of destination.	The pest import requirements depend on the plant species and on the type of planting material (see paragraph 51).	EPPO Norway Belarus Armenia Azerbaijan
62.	44	Technical	Producers applying for approval to use additional integrated measures for higher pest risk situations should develop a place of production manual that includes a pest management programme and relevant information on production practices and operational systems. The NPPO of the exporting country may approve the place of production to export specific plants to a particular destination when it has determined the integrated measures used meet the phytosanitary import requirements of that country of destination.	The phytosanitary import requirements depend on the plant species and on the type of planting material (see paragraph 51).	European Union
63.	46	Editorial	**2.2.1.1 ~~Place of production~~Quality Management manual for Production**	For consistency if the "place of production" manual is to be replaced with "quality management manual for production.	Singapore

Com. #	Para #	Comment type	Comment	Explanation	Country
64.	47	Editorial	The place of production manual should describe all of the requirements, elements, processes and operational systems that make up the integrated measures for pest risk management of the plants for planting. The manual should be developed, implemented and maintained by the producer and approved by the NPPO of the exporting country2. The manual or parts thereof should be specific to particular plant species or destinations. If the manual is amended, it should be approved by the NPPO of the exporting country.	Footnotes should be on the same page as the reference in text, not at the end of the standard at para 135. See previously published ISPMs eg ISPM 18	Australia
65.	47	Editorial	The place of production manual should describe all of the requirements, elements, processes and operational systems that make up the integrated measures for pest risk management of the plants for planting. The manual should be developed, implemented and maintained by the producer and approved by the NPPO of the exporting country~~2~~. The manual or parts thereof should be specific to particular plant species or destinations. If the manual is amended, it should be re-submitted for approval ~~ed~~ by the NPPO of the exporting country.	provides clarity	Canada
66.	47	Editorial	The ~~place of production~~ quality management manual for production should describe all of the requirements, elements, processes and operational systems that make up the integrated measures for pest risk management of the plants for planting. The manual should be developed, implemented and maintained by the producer and approved by the NPPO of the exporting country2. The manual or parts thereof should be specific to particular plant species or destinations. If the manual is amended, it should be approved by the NPPO of the exporting country.	For consistency if the "quality management manual for production" is adopted above.	Singapore
67.	48	Editorial	The ~~place of production~~ quality management manual for production may include the following elements:	For consistency if " the quality management manual for production" is to be adopted above.	Singapore
68.	49	Editorial	• a description of the organizational structure and of the responsibilities of the relevant personnel, including names of the person designated as responsible for the technical performance of the place of production and the plant protection specialist (see section 2.2.1.3) (either of these personnel may serve as the contact point between the NPPO and the producer, and should notify the NPPO of the exporting country upon detection of pests regulated in the country of destination) • a plan and description of the place of production, which is kept up to date and which records when, where and how the various species and types of plants for planting are produced, treated, stored or prepared for movement from the place of production (including information on plant species, source of plant material and type of plant material such as cuttings, *in vitro* cultures, bare root plants)	For clarity.	Singapore

Com. #	Para #	Comment type	Comment	Explanation	Country
			• a pest management programme (see section 2.2.1.2) • a description of dispatch and receiving locations within the place of production • handling procedures for incoming plant material, including procedures to ensure segregation of incoming plant material from material already on site • a description of subcontracted activities and the process for approval • a description of documentation procedures to maintain evidence of the source and origin of propagation material • a description of how internal audits will be conducted, including the frequency and ~~who is~~ the responsible personnel. • procedures for recall of plants when non-conformity is detected, if appropriate • procedures for visitors.		
69.	49	Substantive	• a description of the organizational structure and of the responsibilities of the relevant personnel, including names of the person designated as responsible for the technical performance of the place of production and the plant protection specialist (see section 2.2.1.3) (either of these personnel may serve as the contact point between the NPPO and the producer, and should notify the NPPO of the exporting country upon detection of pests regulated in the country of destination) • a plan and description of the place of production, which is kept up to date and which records when, where and how the various species and types of plants for planting are produced, treated, stored or prepared for movement from the place of production (including information on plant species, source of plant material and type of plant material such as cuttings, *in vitro* cultures, bare root plants) • a pest management programme (see section 2.2.1.2) • procedures to notify the NPPO of the exporting country if a pest regulated in the destination country is detected • a description of dispatch and receiving locations within the place of production	This is a requirement in 2.1.2 and shold be included in the place of production manual.	Australia

Com. #	Para #	Comment type	Comment	Explanation	Country
			• handling procedures for incoming plant material, including procedures to ensure segregation of incoming plant material from material already on site • a description of subcontracted activities and the process for approval • a description of documentation procedures to maintain evidence of the source and origin of propagation material • a description of how internal audits will be conducted, including the frequency and who is responsible • procedures to notify the NPPO of the exporting country if a pest regulated in the destination country is detected • procedures for recall of plants when non-conformity is detected, if appropriate • procedures for visitors.		
70.	49	Substantive	• a description of the organizational structure and of the responsibilities of the relevant personnel, including name~~s~~ of the person designated as responsible for the technical performance of the place of production and the plant protection specialist (see section 2.2.1.3) (either of these personnel may serve as the contact point between the NPPO and the producer, and should notify the NPPO of the exporting country upon detection of pests regulated in the country of destination) • a plan and description of the place of production, which is kept up to date and which records when, where and how the various species and types of plants for planting are produced, treated, stored or prepared for movement from the place of production (including information on plant species, source of plant material and type of plant material such as cuttings, *in vitro* cultures, bare root plants) • a pest management programme (see section 2.2.1.2) • a description of dispatch and receiving locations within the place of production • handling procedures for incoming plant material, including procedures to ensure segregation of incoming plant material from material already on site		Peru

Com. #	Para #	Comment type	Comment	Explanation	Country
			• a description of subcontracted activities and the process for approval • a description of documentation procedures to maintain evidence of the source and origin of propagation material • a description of how internal audits will be conducted, including the frequency and who is responsible • procedures for recall of plants when non-conformity is detected, if appropriate • procedures for visitors.		
71.	49	Substantive	• a description of the organizational structure and of the responsibilities of the relevant personnel, including names of the person designated as responsible for the technical performance of the place of production and the plant protection specialist (see section 2.2.1.3) (either of these personnel may serve as the contact point between the NPPO and the producer, and should notify the NPPO of the exporting country upon detection of pests regulated in the country of destination) • a plan and description of the place of production~~,~~ including demarcated or comparmentalised plots, which is kept up to date and which records when, where and how the various species and types of plants for planting are produced, treated, stored or prepared for movement from the place of production (including information on plant species, source of plant material and type of plant material such as cuttings, *in vitro* cultures, bare root plants) • a pest management programme (see section 2.2.1.2) • a description of dispatch and receiving locations within the place of production • handling procedures for incoming plant material, including procedures to ensure segregation of incoming plant material from material already on site • a description of subcontracted activities and the process for approval • a description of documentation procedures to maintain evidence of the source and origin of propagation material • a description of how internal audits will be conducted, including the	Demarcated production plots for ease of traceability. Compartmentalisation is for disease control and containment.	Singapore

Com. #	Para #	Comment type	Comment	Explanation	Country
			frequency and who is responsible • procedures for recall of plants when non-conformity is detected, if appropriate • procedures for visitors.		
72.	49	Substantive	• a description of the organizational structure and of the responsibilities of the relevant personnel, including names of the person designated as responsible for the technical performance of the place of production and the plant protection specialist (see section 2.2.1.3) (either of these personnel may serve as the contact point between the NPPO and the producer, and should notify the NPPO of the exporting country upon detection of pests regulated in the country of destination) • a plan and description of the place of production, which is kept up to date and which records when, where and how the various species and types of plants for planting are produced, treated, stored or prepared for movement from the place of production (including information on plant species, source of plant material and type of plant material such as cuttings, *in vitro* cultures, bare root plants) • a pest management programme (see section 2.2.1.2) • exclusionary measure that the place of production whould have in place • a description of dispatch and receiving locations within the place of production • handling procedures for incoming plant material, including procedures to ensure segregation of incoming plant material from material already on site • a description of subcontracted activities and the process for approval • a description of documentation procedures to maintain evidence of the source and origin of propagation material • a description of how internal audits will be conducted, including the frequency and who is responsible • procedures for recall of plants when non-conformity is detected, if appropriate	need to include a dashpoint for exclusionary measures that place of production should have	United States of America

Com. #	Para #	Comment type	Comment	Explanation	Country
			• procedures for visitors.		
73.	49	Technical	• a description of the organizational structure and of the responsibilities of the relevant personnel, including names of the technician ~~person~~ designated as responsible for the technical performance of the place of production and the plant protection specialist (see section 2.2.1.3) (either of these personnel may serve as the contact point between the NPPO and the producer, and should notify the NPPO of the exporting country upon detection of pests regulated in the country of destination) • a plan and description of the place of production, which is kept up to date and which records when, where and how the various species and types of plants for planting are produced, treated, stored or prepared for movement from the place of production (including information on plant species, source of plant material and type of plant material such as cuttings, *in vitro* cultures, bare root plants) • a pest management programme (see section 2.2.1.2) • a description of dispatch and receiving locations within the place of production • handling procedures for incoming plant material, including procedures to ensure segregation of incoming plant material from material already on site • a description of subcontracted activities and the process for approval • a description of documentation procedures to maintain evidence of the source and origin of propagation material • a description of how internal audits will be conducted, including the frequency and who is responsible • procedures for recall of plants when non-conformity is detected, if appropriate • procedures for visitors.	Since the person is responsible for the technical performance of the place of production it has to be a technician.	Argentina Brazil COSAVE Uruguay Peru Bolivia Chile
74.	51	Editorial	The pest management programme, included in the ~~place of production~~ manual, should describe procedures or processes approved by the NPPO of the exporting country and designed to either prevent infestations or control pests. It should include a description of		Singapore

Com. #	Para #	Comment type	Comment	Explanation	Country
			the phytosanitary import requirements of the importing countries for each plant species and type of plant material. Table 2 in Appendix 1 provides examples of possible measures that NPPOs may require for different types of plants for planting and different types or groups of pests associated with them.		
75.	53	Editorial	• sanitation and hygiene – contributing to preventing the introduction of pests to the place of production and minimizing spread within a place of production, for example: o regular removal of infested plants and plant debris o disinfection of tools and equipment o removal of weeds and non-crop plant material o treatment of water o management of surface water o personal hygiene (e.g. hand washing, foot baths, coveralls or aprons) o limited access o routines for use of packaging material and packaging facilities • pest control – products, procedures and measures (see Appendix 1) to prevent or treat pests such as: o physical barriers (e.g. screens, double doors) o disinfection of growing media and containers used to grow plants o crop protection product applications (e.g. chemical, biological) o disposal of infested plants o mass trapping of both pests of concern and possible vectors o climate control o hot water or heat treatment • handling of incoming plant material – methods and documentation for managing pest risks associated with incoming plant material, with descriptions of: o measures to ensure that all plants for planting entering the place of production are free of pests regulated by the importing countries, possible pest vectors and practically free of other pests~~., and that the risk of introducing and transmitting plant pests is mitigated~~ o procedures to be followed if pests are detected	Bullet 3, indent 1: Deletion of unnecessary, confusing and repetitive wording after the comma. Bullet 6: More correct and precise. Bullet 6, indent 2: 'non-compliant plants sounds as though plants are taking actions. More precise.	EPPO Norway European Union Belarus Armenia Azerbaijan

Com. #	Para #	Comment type	Comment	Explanation	Country
			○ records to be kept, including the date, the name of the person carrying out the examination, any pests, damage or symptoms found, and any corrective actions taken • examination of plant material (see section 2.2.1.5) and production sites – methods, frequency and intensity used to examine all plant material in the place of production (e.g. by visual examination, sampling, testing and trapping), including details of any laboratories used to identify pests found and methods used • examination of plants for planting prior to export – methods, frequency and intensity used to examine plants when exports are being prepared • identification and management of infested ~~product~~plants, with descriptions of: ○ how an infested plant will be identified and treated ○ measures to ensure that ~~non-compliant~~ plants that do not meet importing countries' requirements are not exported ○ disposal of removed plant material in a manner that prevents buildup and spread of pests • keeping records of the application of crop protection products and other pest management measures.		
76.	53	Substantive	• sanitation and hygiene – contributing to preventing the introduction of pests to the place of production and minimizing spread within a place of production, for example: ○ regular removal of infested plants and plant debris ○ disinfection of tools and equipment ○ removal of weeds and non-crop plant material ○ treatment of water ○ management of surface water ○ personal hygiene (e.g. hand washing, foot baths, coveralls or aprons) ○ limited access ○ routines for use of packaging material and packaging facilities • pest control – products, procedures and measures (see Appendix 1) to prevent or treat pests such as:	Add for completeness to pick up rest	Australia

Com. #	Para #	Comment type	Comment	Explanation	Country
			o physical barriers (e.g. screens, double doors) o disinfection of growing media and containers used to grow plants o crop protection product applications (e.g. chemical, biological) o disposal of infested plants o mass trapping of both pests of concern and possible vectors o climate control o hot water or heat treatment o any other treatment proven to control the pest of concern • handling of incoming plant material – methods and documentation for managing pest risks associated with incoming plant material, with descriptions of: o measures to ensure that all plants for planting entering the place of production are free of pests regulated by the importing countries, possible pest vectors and practically free of other pests, and that the risk of introducing and transmitting plant pests is mitigated o procedures to be followed if pests are detected o records to be kept, including the date, the name of the person carrying out the examination, any pests, damage or symptoms found, and any corrective actions taken • examination of plant material (see section 2.2.1.5) and production sites – methods, frequency and intensity used to examine all plant material in the place of production (e.g. by visual examination, sampling, testing and trapping), including details of any laboratories used to identify pests found and methods used • examination of plants for planting prior to export – methods, frequency and intensity used to examine plants when exports are being prepared • identification and management of infested product, with descriptions of: o how an infested plant will be identified and treated o measures to ensure that non-compliant plants are not exported o disposal of removed plant material in a manner that prevents buildup and spread of pests • keeping records of the application of crop protection products and other		

Com. #	Para #	Comment type	Comment	Explanation	Country
			pest management measures.		
77.	53	Substantive	• sanitation and hygiene – contributing to preventing the introduction of pests to the place of production and minimizing spread within a place of production, for example: o regular removal of infested plants and plant debris o disinfection of tools and equipment o removal of weeds and non-crop plant material o treatment of water o management of surface water o personal hygiene (e.g. hand washing, foot baths, coveralls or aprons) o limited access o routines for use of packaging material and packaging facilities • pest control – products, procedures and measures (see Appendix 1) to prevent or treat pests such as: o Observations of pests are recorded in a pest log. o Pest control actions and treatments are documented including r ecord of products used for management of pests. o physical barriers (e.g. screens, double doors) o disinfection of growing media and containers used to grow plants o crop protection product applications (e.g. chemical, biological) o disposal of infested plants o mass trapping of both pests of concern and possible vectors o climate control o hot water or heat treatment • handling of incoming plant material – methods and documentation for managing pest risks associated with incoming plant material, with descriptions of: o measures to ensure that all plants for planting entering the place of production are free of pests regulated by the importing countries, possible pest vectors and practically free of other pests, and that the risk of introducing and transmitting plant pests is mitigated	Recording of pest observed and treatment measures sued will enable the producer to monitor the situation and devise strategies for control. "Removed and " - It is important that non compliant plants are removed and segregated frm compliant plants so that theu would not be exported by mistake. "Corrective actions" - the causes leading to infested products have to be identified, addressed and corrected to ensure complaince to importing country's phytosanitary import requirements.	Singapore

Com. #	Para #	Comment type	Comment	Explanation	Country
			o procedures to be followed if pests are detected o records to be kept, including the date, the name of the person carrying out the examination, any pests, damage or symptoms found, and any corrective actions taken • examination of plant material (see section 2.2.1.5) and production sites – methods, frequency and intensity used to examine all plant material in the place of production (e.g. by visual examination, sampling, testing and trapping), including details of any laboratories used to identify pests found and methods used • examination of plants for planting prior to export – methods, frequency and intensity used to examine plants when exports are being prepared • identification and management of infested product, with descriptions of: o how an infested plant will be identified and treated o measures to ensure that non-compliant plants are removed and not exported o disposal of removed plant material in a manner that prevents buildup and spread of pests • keeping records of the application of crop protection products and other pest management measures. • Corrective actions to prevent recurrence		
78.	53	Substantive	• sanitation and hygiene – contributing to preventing the introduction of pests to the place of production and minimizing spread within a place of production, for example: o regular removal of infested plants and plant debris o disinfection of tools and equipment o removal of weeds and non-crop plant material o treatment of water o management of surface water o personal hygiene (e.g. hand washing, foot baths, coveralls or aprons) o limited access o routines for use of packaging material and packaging facilities • pest control – products, procedures and measures (see Appendix 1) to	additional points to consider	United States of America

Com. #	Para #	Comment type	Comment	Explanation	Country
			prevent or treat pests such as: o physical barriers (e.g. screens, double doors) and exclusion o disinfection of growing media and containers used to grow plants o crop protection product applications (e.g. chemical, biological) o disposal of infested plants o mass trapping of both pests of concern and possible vectors o climate control o hot water or heat treatment o sterilization and disinfection of other materials as needed • handling of incoming plant material – methods and documentation for managing pest risks associated with incoming plant material, with descriptions of: o measures to ensure that all plants for planting entering the place of production are free of pests regulated by the importing countries, possible pest vectors and practically free of other pests, and that the risk of introducing and transmitting plant pests is mitigated o procedures to be followed if pests are detected o records to be kept, including the date, the name of the person carrying out the examination, any pests, damage or symptoms found, and any corrective actions taken • examination of plant material (see section 2.2.1.5) and production sites – methods, frequency and intensity used to examine all plant material in the place of production (e.g. by visual examination, sampling, testing and trapping), including details of any laboratories used to identify pests found and methods used • examination of plants for planting prior to export – methods, frequency and intensity used to examine plants when exports are being prepared • identification and management of infested product, with descriptions of: o how an infested plant will be identified and treated o measures to ensure that non-compliant plants are not exported o disposal of removed plant material in a manner that prevents buildup and spread of pests • keeping records of the application of crop protection products and other		

Com. #	Para #	Comment type	Comment	Explanation	Country
			pest management measures.		
79.	53	Technical	• sanitation and hygiene – contributing to preventing the introduction of pests to the place of production and minimizing spread within a place of production, for example: o regular removal of infested plants and plant debris o disinfection of tools and equipment o removal of weeds and non-crop plant material o treatment of water o management of surface water o personal hygiene (e.g. hand washing, foot baths, coveralls or aprons) o limited access o routines for use of packaging material and packaging facilities • pest control – products, procedures and measures (see Appendix 1) to prevent or treat pests such as: o physical barriers (e.g. screens, double doors) o disinfection of growing media and containers used to grow plants o crop protection product applications (e.g. chemical, biological) o disposal of infested plants o mass trapping of both pests of concern and possible vectors o climate control o hot water or heat treatment • handling of incoming plant material – methods and documentation for managing pest risks associated with incoming plant material, with descriptions of: o measures to ensure that all plants for planting entering the place of production are free of pests regulated by the importing countries, possible pest vectors and practically free of other pests, and that the risk of introducing and transmitting plant pests is mitigated o procedures to be followed if pests and/or possible vectors are detected o records to be kept, including the date, the name of the person	Vectors should be controlled	Japan

Com. #	Para #	Comment type	Comment	Explanation	Country
			carrying out the examination, any pests (including possible vectors), damage or symptoms found, and any corrective actions taken • examination of plant material (see section 2.2.1.5) and production sites – methods, frequency and intensity used to examine all plant material in the place of production (e.g. by visual examination, sampling, testing and trapping), including details of any laboratories used to identify pests found and methods used • examination of plants for planting prior to export – methods, frequency and intensity used to examine plants when exports are being prepared • identification and management of infested product, with descriptions of: o how an infested plant will be identified and treated o measures to ensure that non-compliant plants are not exported o disposal of removed plant material in a manner that prevents buildup and spread of pests • keeping records of the application of crop protection products and other pest management measures.		
80.	53	Technical	• sanitation and hygiene – contributing to preventing the introduction of pests to the place of production and minimizing spread within a place of production, for example: o ~~regular removal of infested plants and plant debris~~ o disinfection of tools and equipment o removal of weeds and non-crop plant material o treatment of water o management of surface water o personal hygiene (e.g. hand washing, foot baths, coveralls or aprons) o limited access o routines for use of packaging material and packaging facilities • pest control – products, procedures and measures (see Appendix 1) to prevent or treat pests such as: o physical barriers (e.g. screens, double doors) o disinfection of growing media and containers used to grow	This element is considered in the next bullet about pest control. Second bullet modified to consider text deleted under bullet sanitation and hygiene	Paraguay

Com. #	Para #	Comment type	Comment	Explanation	Country
			plants o crop protection product applications (e.g. chemical, biological) o disposal of infested plants and plant debris o mass trapping of both pests of concern and possible vectors o climate control o hot water or heat treatment • handling of incoming plant material – methods and documentation for managing pest risks associated with incoming plant material, with descriptions of: o measures to ensure that all plants for planting entering the place of production are free of pests regulated by the importing countries, possible pest vectors and practically free of other pests, and that the risk of introducing and transmitting plant pests is mitigated o procedures to be followed if pests are detected o records to be kept, including the date, the name of the person carrying out the examination, any pests, damage or symptoms found, and any corrective actions taken • examination of plant material (see section 2.2.1.5) and production sites – methods, frequency and intensity used to examine all plant material in the place of production (e.g. by visual examination, sampling, testing and trapping), including details of any laboratories used to identify pests found and methods used • examination of plants for planting prior to export – methods, frequency and intensity used to examine plants when exports are being prepared • identification and management of infested product, with descriptions of: o how an infested plant will be identified and treated o measures to ensure that non-compliant plants are not exported o disposal of removed plant material in a manner that prevents buildup and spread of pests • keeping records of the application of crop protection products and other pest management measures.		
81.	55	Editorial	Producers implementing additional integrated measures in higher pest risk situations		Singapore

Com. #	Para #	Comment type	Comment	Explanation	Country
			should have access to a specialist ~~with a well-established working knowledge of~~ who is competent in pest identification and control in order to ensure that sanitation, pest monitoring and pest control measures are implemented, as described in the place of production manual. The plant protection specialist may serve as the contact person with diagnosticians who may be needed for pest identification.		
82.	55	Substantive	Producers implementing additional integrated measures in higher pest risk situations ~~should have access to~~ may use a specialist with a well-established working knowledge of pest identification and control in order to ensure that sanitation, pest monitoring and pest control measures are implemented, as described in the place of production manual. The plant protection specialist may serve as the contact person with diagnosticians who may be needed for pest identification.	Access may not assure that a specialist is used	Australia
83.	55	Substantive	Producers implementing additional integrated measures in higher pest risk situations should have access to a specialist with a well-established working knowledge of pest identification and control in order to ensure that sanitation, pest monitoring and pest control measures are implemented, as described in the place of production manual. The plant protection specialist may serve as the contact person with diagnosticians who may be needed for pest identification.	This concept needs to be turned around. The NPPO establishes measures and requirements and the producer is then required to carry out the measures and requirements. It is not up to the producer to decide what measures should be implemented.	United States of America
84.	59	Fond	Tout le matériel végétal issu d'un lieu de production (y compris les végétaux destinés aux marchés intérieurs et à d'autres lieux de production) devrait être inspecté à échéances régulières basé sur le risque par le personnel désigné, pour détecter la présence éventuelle d'organismes nuisibles, selon les méthodes établies et des mesures correctives devraient être prises le cas échéant.	ajouter après le mot régulière ' basé sur le risque »	Mali Burkina Faso Togo Gabon
85.	62	Editorial	• Plant material should be packed in a manner to prevent infestation by regulated pests. • Packaging material should be clean, free of pests and meet the phytosanitary import requirements. • Conveyances used to move plant material from the place of production should be examined and cleaned as necessary prior to loading. • Each lot ~~of~~ in a consignment should be identified in a way that can be traced back to the place of production.	Better wording.	EPPO Norway European Union Belarus Armenia Azerbaijan
86.	62	Substantive	• Plant material should be packed in a manner to prevent infestation by regulated pests. • Packaging material should be clean, free of pests and meet the phytosanitary import requirements.	These methods of identifications are essential in assisting trace back during infestation or interception.	Singapore

Com. #	Para #	Comment type	Comment	Explanation	Country
			• Conveyances used to move plant material from the place of production should be examined and cleaned as necessary prior to loading. • Each lot of a consignment should be identified in a way e.g labelling, coding, tagging that can be traced back to the place of production.		
87.	64	Editorial	Internal audits should be conducted to ensure that the producer is in compliance with its place of production manual. Internal audits should focus on whether the manual and its implementation meet the requirements of the NPPOs of the exporting and importing countries. For example, the internal audit may evaluate the competency of ~~place of production~~ personnel in identifying and controlling pests, carrying out duties and responsibilities and whether the record keeping ~~of the producer~~ is adequate to keep track of the origin of plant material, labels, etc.	Redundant because the section is all about internal audit. Confusing.	EPPO Norway Belarus Armenia Azerbaijan
88.	64	Editorial	Internal audits should be conducted to ensure that the producer is in compliance with its ~~place of production~~ manual. Internal audits should focus on whether the manual and its implementation meet the requirements of the NPPOs of the exporting and importing countries. For example, the internal audit may evaluate the competency of ~~place of production~~ personnel in identifying and controlling pests, carrying out duties and responsibilities, and whether the record keeping ~~of the producer~~ is adequate to keep track of the origin of plant material, labels, etc.	Redundant because the section is all about internal audit. Confusing. Comma added in the last sentence after '...and responsibilities' makes the sentence clearer.	European Union
89.	64	Editorial	Internal audits should be conducted to ensure that the producer is in compliance with its ~~place of production~~ manual. Internal audits should focus on whether the manual and its implementation meet the requirements of the NPPOs of the exporting and importing countries. For example, the internal audit may evaluate the competency of place of production personnel in identifying and controlling pests, carrying out duties and responsibilities and whether the record keeping of the producer is adequate to keep track of the origin of plant material, labels, etc.		Singapore
90.	66	Substantive	If the audit identifies any critical non-conformities (see section 2.3), the ~~producer~~ auditor should immediately notify the NPPO of the exporting country (with confirmation in writing) and ensure that ~~non-conforming~~ no plants for planting are not exported from that place of production until all critical non-conformities are rectified. Immediate corrective actions should be taken under the supervision of the NPPO of the exporting country.	A critical non-conformance points to a systemic failure within the business system, not just with one batch of plants. This is how it is presented in paragraphs 75 and 76, which are more appropriate. The response to non-conformities (critical and otherwise) should be consistent with the proven approach taken through the current ICA system. [Note: Dot point 5 of paragraph 44 of Supplement 1 to ISPM 5 reinforces this approach]	Australia

Com. #	Para #	Comment type	Comment	Explanation	Country
91.	68	Editorial	Up-to-date records should be maintained and made available to the NPPO. The ~~place of production~~ quality management manual for production should clearly identify individuals responsible for maintaining various records, and the location and manner in which such records are maintained. Records should be maintained for three years (or longer, if justified). Records should include date, name and signature of the person who carried out the task or prepared the document. Examples of records that may be required include:	For consistency if the change is accepted above.	Singapore
92.	68	Technical	Up-to-date records should be maintained and made available to the NPPO. The place of production manual should clearly identify individuals responsible for maintaining various records, and the location and manner in which such records are maintained. Records should be maintained as determined by the NPPO of the exporting country ~~for three years (or longer, if justified).~~ Records should include date, name and signature of the person who carried out the task or prepared the document. Examples of records that may be required include:	It is not necessary to specify a determined period because it could vary according to type material, etc.	Argentina Brazil Paraguay COSAVE Uruguay Bolivia Peru Chile
93.	68	Technical	Up-to-date records should be maintained and made available to the NPPO of the exporting country. The place of production manual should clearly identify individuals responsible for maintaining various records, and the location and manner in which such records are maintained. Records should be maintained for three years (or longer, if justified). Records should include date, name and signature of the person who carried out the task or prepared the document. Examples of records that may be required include:	For precision and consistency. Regulating and overseeing the producer is the responsibility of the NPPOexp. Only by agreement between the NPPOs can producer records become available to NPPOimp.	EPPO Norway European Union Belarus Armenia Azerbaijan
94.	68	Technical	Up-to-date records should be maintained and made available to the NPPO of both countries. The place of production manual should clearly identify individuals responsible for maintaining various records, and the location and manner in which such records are maintained. Records should be maintained for three years (or longer, if justified). Records should include date, name and signature of the person who carried out the task or prepared the document. Examples of records that may be required include:	Both importing and exporting country NPPOs should have access to records.	United States of America
95.	69	Editorial	• invoices, phytosanitary certificates and other information that substantiate the origin and the phytosanitary status of incoming plant material • results of the inspection of incoming plant material • results of audits • records of examination during production including any pests, damage or symptoms detected and corrective actions taken • records of pest management measures taken to prevent or control pests (including method of application, product applied, dosage and date of	Bullet point 6: Better wording	EPPO Norway European Union Belarus Armenia Azerbaijan

Com. #	Para #	Comment type	Comment	Explanation	Country
			application) • records of examination of outgoing plant material, including type, quantity of material exported and the name of the country ~~exported to~~ of destination • copies of phytosanitary certificates for plant material exported by the producer • records of non-conformities identified and the corrective or preventative actions taken • records of personnel responsible for applying pest management measures • records of personnel training and their qualifications • copies of the forms used for internal audit reports and checklists • records necessary to maintain forward and backward traceability of plants for planting from the place of production.		
96.	69	Substantive	• invoices, phytosanitary certificates and other information that substantiate the origin and the phytosanitary status of incoming plant material • results of the inspection of incoming plant material • results of audits • records of examination during production including any pests, damage or symptoms detected and corrective actions taken • records of pest management measures taken to prevent or control pests (including method of application, product applied, dosage, duration and date of application) • records of examination of outgoing plant material, including type, quantity of material exported and country exported to • copies of phytosanitary certificates for plant material exported by the producer • records of non-conformities identified and the corrective or preventative actions taken • records of personnel responsible for applying pest management measures	Duration ie soaking/dipping of treatment is important as it will affect the efficacy of treatment.	Singapore

Com. #	Para #	Comment type	Comment	Explanation	Country
			• records of personnel training and their qualifications • copies of the forms used for internal audit reports and checklists • records necessary to maintain forward and backward traceability of plants for planting from the place of production.		
97.	69	Technical	• ~~invoices,~~ phytosanitary certificates and other information that substantiate the origin and the phytosanitary status of incoming plant material • results of the inspection of incoming plant material • results of audits • records of examination during production including any pests, damage or symptoms detected and corrective actions taken • records of pest management measures taken to prevent or control pests (including target pest, method of application, product applied, dosage and date of application) • records of examination of outgoing plant material, including type, quantity of material exported and country exported to • copies of phytosanitary certificates for plant material exported by the producer • records of non-conformities identified and the corrective or preventative actions taken • records of personnel responsible for applying pest management measures • records of personnel training and their qualifications • copies of the forms used for internal audit reports and checklists • records necessary to maintain forward and backward traceability of plants for planting from the place of production.	Invoices are included in other information. Target pest is relevant information that should be included.	Paraguay
98.	75	Editorial	The place of production (or ~~relevant parts thereof~~related sites for production) should have its approval withdrawn and exports should be immediately suspended if the NPPO of the exporting country:	relevant parts therof is unclear and not specific.	Singapore
99.	76	Editorial	• finds a criticalnon-conformity	Correct tense.	EPPO

Com. #	Para #	Comment type	Comment	Explanation	Country
			• repeatedly identifies non-critical non-conformities • identifies multiple non-critical non-conformities • finds that the producer ~~fails~~ failed to carry out the required corrective actions within the specified time period.		European Union Belarus Armenia Azerbaijan
100.	76	Editorial	• finds a critical non-conformity • repeatedly identifies non-critical non-conformities • identifies multiple non-critical non-conformities • finds that the producer ~~fails~~ failed to carry out the required corrective actions within the specified time period.	Correct tense.	Norway
101.	76	Substantive	• finds a criticalnon-conformity • repeatedly identifies similar non-critical non-conformities • identifies multiple non-critical non-conformities • finds that the producer fails to carry out the required corrective actions within the specified time period. • Receive interception notices from importing country	By adding "similar", it distinguishes this non-conformity with th eone in indent 3 that states identifies multiple non-critical non-conformities. New indent - interception notices indicates that non-compliance had been found by the NPPO of importing country which indicates that the efficacy of teh integrated measures utilised had been compromised.	Singapore
102.	78	Editorial	The corrective actions may require a change to ~~the integrated measures~~the requirements and should include measures to prevent recurrence of the failures identified.	The intended meaning is that 'requirements' may need to be changed, not simply the measures.	EPPO Norway European Union Belarus Armenia Azerbaijan
103.	79	Substantive	The NPPO of the exporting country should inform the NPPO of the importing country of any suspension and reinstatement.	Such requirements would be illogical. There is no requirement in this ISPM that NPPOimp should be informed about the individual registration of producers, hence there is no reason to inform about suspensions etc..	EPPO Norway Belarus Armenia Azerbaijan
104.	79	Substantive	The NPPO of the exporting country should inform the NPPO of the importing country of any suspension and reinstatement.	Considered not appropriate. The sentence creates an obligation to the exporting NPPO that is not technically justified. Such	European Union

Com. #	Para #	Comment type	Comment	Explanation	Country
				requirements would be illogical. There is no requirement in this ISPM that NPPOimp should be informed about the individual registration of producers, hence there is no reason to inform about suspensions etc..	
105.	83	Editorial	• communicating importing country's requirements to producers • developing and setting up the integrated measures • approving ~~places of production~~ producers seeking participation in using integrated measures • overseeing approved places of production • ensuring that all plants for planting exported by approved places of production meet the phytosanitary import requirements • carrying out export inspections and issuing phytosanitary certificates for consignments from approved places of production • providing information on integrated measures developed to the NPPO of the importing country upon request • granting and facilitating, where justified, visits and audits carried out by the NPPO of the importing country in accordance with section 4.1 • providing adequate information on relevant pest outbreaks to the NPPO of the importing country in accordance with ISPM 17:2002.		Singapore
106.	83	Substantive	• communicating import country requirements to producers • ~~developing and setting~~ specifying ~~up~~ the integrated measures • approving places of production seeking participation in using integrated measures • overseeing approved places of production • ensuring that all plants for planting exported by approved places of production meet the phytosanitary import requirements • carrying out export inspections and issuing phytosanitary certificates for consignments from approved places of production • providing information on integrated measures developed to the NPPO of the importing country upon request • granting and facilitating, where justified, visits and audits carried out by	The NPPO wouldn't necessarily develop or set up the integrated measures	Australia

Com. #	Para #	Comment type	Comment	Explanation	Country
			the NPPO of the importing country in accordance with section 4.1 • providing adequate information on relevant pest outbreaks to the NPPO of the importing country in accordance with ISPM 17:2002.		
107.	83	Substantive	• communicating import country requirements to producers • developing and setting up the integrated measures • approving places of production seeking participation in using integrated measures • overseeing approved places of production with the objective of ensuring that ~~all~~ plants for planting exported by approved places of production meet the phytosanitary import requirements • carrying out export inspections and issuing phytosanitary certificates for consignments from approved places of production • providing information on integrated measures developed to the NPPO of the importing country upon request • granting and facilitating, where justified, visits and audits carried out by the NPPO of the importing country in accordance with section 4.1 • providing adequate information on relevant pest outbreaks to the NPPO of the importing country in accordance with ISPM 17:2002.	Bullets 4 and 5: combine into one bullet point in order to simplify and set up a similar level of obligation as in the Convention in Article V(1).	European Union
108.	83	Technical	• communicating import country requirements to producers • developing and setting up the requirements for the integrated measures • approving places of production seeking participation in using integrated measures • overseeing approved places of production • ensuring that all plants for planting exported by approved places of production meet the phytosanitary import requirements • carrying out export inspections and issuing phytosanitary certificates for consignments from approved places of production • providing information on integrated measures developed to the NPPO of the importing country upon request • granting and facilitating, where justified, visits and audits carried out by the NPPO of the importing country in accordance with section 4.1	Missing words - it's the requirements for the integrated measures that are set up by the NPPO	EPPO Norway European Union Belarus Armenia Azerbaijan

Com. #	Para #	Comment type	Comment	Explanation	Country
			• providing adequate information on relevant pest outbreaks to the NPPO of the importing country in accordance with ISPM 17:2002.		
109.	83	Technical	• communicating import country requirements to producers • developing and setting up the integrated measures • approving places of production seeking participation in using integrated measures • overseeing approved places of production • ~~ensuring~~ issuing phytosanitary certificates attesting that all plants for planting exported by approved places of production meet the phytosanitary import requirements • ~~carrying out export inspections and issuing phytosanitary certificates for consignments from approved places of production~~ • providing information on integrated measures developed to the NPPO of the importing country upon request • granting and facilitating, where justified, visits and audits carried out by the NPPO of the importing country in accordance with section 4.1 • providing adequate information on relevant pest outbreaks to the NPPO of the importing country in accordance with ISPM 17:2002.	It is responsibility of the NPPO of the exporting country to ensure compliance in order to issue the PC. Not only inspection is used, other phytosanitary procedures like testing may be used.	Paraguay Argentina COSAVE Uruguay Bolivia Chile Brazil Peru
110.	85	Substantive	In developing and setting up its integrated measures, the NPPO of the exporting country should specify the requirements to be met by a producer ~~based on the pest risk factors described in Annex 1~~ and the requirements of the importing country or countries. Furthermore, the documentation and communication requirements for the producer should be specified.	listing factors are taken into account when conducting a PRA and are already set out in ISPM that refer to the ARP	Costa Rica
111.	89	Editorial	• ~~a review of the place of production manual and~~ an initial documentation audit ie review of the manual at the place of production to verify that it is complying with the requirements established according to the pest risk factors of its production • an implementation audit to verify that: o the producer complies with the protocols, procedures and standards specified in their place of production manual o the required supporting documentation is sufficient, current and	To avoid duplication as documentation audit implies checking the manual and its related documents to verify complaince with the requirements established according to the pest risk factors of its production.	Singapore

Com. #	Para #	Comment type	Comment	Explanation	Country
			readily available to personnel o adequate records and documents are maintained o internal audits are performed and corrective actions completed o procedures in place are adequate to ensure that any pest problems are quickly identified and appropriate actions are taken to ensure that only plants that meet the phytosanitary import requirements of the importing country are exported o either plant material within the place of production has remained free of all quarantine pests or the NPPO was duly informed about infestations of quarantine pests and appropriate measures were taken to ensure that the pest has been eradicated • the establishment of procedures to meet tolerance levels for regulated non-quarantine pests as required.		
112.	89	Substantive	• a review of the place of production manual and an initial documentation audit at the place of production to verify that it is complying with the requirements established according to the pest risk factors of its production • an ~~implementation~~ audit to verify that: o the producer complies with the protocols, procedures and standards specified in their place of production manual o the required supporting documentation is sufficient, current and readily available to personnel o adequate records and documents are maintained o internal audits are performed and corrective actions completed o procedures in place are adequate to ensure that any pest problems are quickly identified and appropriate actions are taken to ensure that only plants that meet the phytosanitary import requirements of the importing country are exported o either plant material within the place of production has remained free of all quarantine pests or the NPPO was duly informed about infestations of quarantine pests and appropriate measures were taken to ensure that the pest has been eradicated	this should simply read "audit" -- the way it reads now it seems as if approval is automatic, but it should be pending results of an audit	United States of America

Com. #	Para #	Comment type	Comment	Explanation	Country
			• the establishment of procedures to meet tolerance levels for regulated non-quarantine pests as required.		
113.	92	Editorial	After ~~authorization~~approval, the NPPO of the exporting country should oversee the place of production, in particular through monitoring or auditing of the production and operational system. The frequency and timing of monitoring or auditing should be determined according to the pest risks, phytosanitary import requirements and on the producer's record of conformity. Monitoring or auditing should include inspection and where applicable, testing of plants for planting, and verification of the documentation and management practices as they relate to the relevant integrated measures.	Consistent use of the wording "approval" for places of production throughout the text.	EPPO Norway European Union Belarus Armenia Azerbaijan
114.	92	Substantive	After authorization by the NPPO or an independent third party, the NPPO of the exporting country should oversee the place of production, in particular through monitoring or auditing of the production and operational system. The frequency and timing of monitoring or auditing should be determined according to the pest risks, phytosanitary import requirements and on the producer's record of conformity. Monitoring or auditing should include inspection and where applicable, testing of plants for planting, and verification of the documentation and management practices as they relate to the relevant integrated measures.	Audits should be conducted by independent auditors or the NPPO. It should not be sufficient for the producer to self-audit.	United States of America
115.	94	Editorial	The integrated ~~pest risk management~~ measures may reduce the need for growing season inspections and, may also reduce the frequency or intensity of export inspections of consignments of plants for planting. A phytosanitary certificate should be issued, and an additional declaration may be added that refers to the application of this ISPM. This additional declaration should be in compliance with ISPM 12:2011.		Singapore
116.	94	Substantive	The integrated pest risk management measures may reduce the need for growing season inspections and, may also reduce the frequency or intensity of export inspections of consignments of plants for planting. A phytosanitary certificate should be issued, ~~and an additional declaration may be added that refers to the application of this ISPM. This additional declaration should be~~ in compliance with ISPM 12:2011.	According to ISPM 5, additional declaration is a statement that is required by an importing country to be entered in the PC and which provides specific additional information on a consignment in relation to regulated pests. According to ISPM 12 AD should only be those containing specific information required by the NPPO of the importing country. The inclusion of an AD referring to this draft ISPM depends on a previous bilateral agreement between importing and exporting countries NPPO.	Paraguay Argentina COSAVE Uruguay Bolivia Chile Peru Brazil
117.	94	Substantive	The integrated pest risk management measures may reduce the need for growing season	First, phytos should not have ADs referencing	United

Com. #	Para #	Comment type	Comment	Explanation	Country
			inspections and, may also reduce the frequency or intensity of export inspections of consignments of plants for planting. A phytosanitary certificate should be issued, and an additional declaration may be added that refers to the application of this ISPM. This additional declaration should be in compliance with ISPM 12:2011.	ISPMs. Secondly, growing season inspections may still be required, if there is technical justification. This paragraph is misleading and should be deleted.	States of America
118.	94	Technical	The integrated pest risk management measures may reduce the need for the NPPO to undertake growing season inspections and, may also reduce the frequency or intensity of export inspections of consignments of plants for planting. A phytosanitary certificate should be issued, and an additional declaration may be added that refers to the application of this ISPM. This additional declaration should be in compliance with ISPM 12:2011.	The integrated measures would hardly reduce the need for growing season inspections, but they may not need to be carried out by the NPPO to the same extent.	EPPO Norway European Union Belarus Armenia Azerbaijan
119.	99	Substantive	~~Plants for planting produced using integrated measures may not require intensive import inspection of every consignment.~~ The NPPO of the importing country may decide to only monitor imported plants for planting produced using integrated measures, including testing samples for the presence of regulated pests and verifying that agreed procedures are followed.	It depends on each case and the NPPO of the importing country decides whether inspection of every consignment is necessary or not. This sentence is not appropriate for "the responsibility of the importing country".	Japan
120.	99	Substantive	Plants for planting produced using integrated measures may not require intensive import inspection of every consignment. The NPPO of the importing country may decide to only monitor imported plants for planting produced using integrated measures, including testing samples for the presence of regulated pests and verifying that agreed procedures are followed.	Same comments as for 94 above. Inspection may still be required if technically justfied.	United States of America
121.	100	Editorial	The NPPO of the importing country should notify the NPPO of the exporting country of any non-compliances (see ISPM 13:2001) that are found upon import or at a later stage in the country of destination.	Moved from end of the last sentence of paragraph 101 to avoid repetition. Replace "date" by " stage" to better expresses the idea	EPPO Norway European Union Belarus Armenia Azerbaijan
122.	101	Editorial	The NPPO of the importing country may also review the system of approval of places of production presented by the NPPO of the exporting country and, where appropriate, conduct audits. The NPPO of the importing country should provide feedback on the results of the reviews, monitoring and audits to the NPPO of the exporting country~~, as well as any findings of non-compliance that are found upon import or at a later date in the country of destination~~.	Moved to paragraph 100 (see comment on that paragraph).	EPPO Norway European Union Belarus Armenia Azerbaijan
123.	103	Substantive	The NPPO of the importing country may request the NPPO of the exporting country to provide reports on audits undertaken by the producer and by the NPPO of the exporting	The NPPO of the export and importing country should be able to conduct site visits if	United States of

Com. #	Para #	Comment type	Comment	Explanation	Country
			country. It may also request to audit the integrated measures as developed and set up by the exporting country. The NPPO of the exporting and importing country should be able to conduct site visits if warranted and justified. This audit may consist of documentation review, inspection and testing of plants produced using integrated measures, and, where appropriate, site visits as a demonstration of the integrated measures used (see ISPM 20:2004) or provided that there is specific justification, for example in cases of non-compliance (ISPM 13:2001).	warranted and justified. THis needs to be included here as well.	America
124.	103	Technical	The NPPO of the importing country may request the NPPO of the exporting country to provide reports on audits undertaken by the producer and by the NPPO of the exporting country. It may also request to audit the integrated measures as developed and set up by the exporting country. This audit may consist of documentation review, inspection and testing of plants produced using integrated measures, and, where appropriate, site visits as a demonstration of the integrated measures used (see ISPM 20:2004) or visits to specific sites provided that there is specific justification, for example in cases of non-compliance (ISPM 13:2001).	To clarify the distinction between the general case (site vists to demonstrate the entire system) from visits to specific sites/producers upon specific justification	EPPO Norway European Union Belarus Armenia Azerbaijan
125.	105	Substantive	**ANNEX 1: Factors that affect the pest risk of plants for planting**	listing factors are taken into account when conducting a PRA and are already set out in ISPM that refer to the ARP	Costa Rica
126.	106	Substantive	**Pest-related factors that affect pest risk**	These factors are taken into account when performing a risk analysis and are regulated in ISPMs for this purpose. (ISPM 2, ISPM 11, ISPM 21). Whether the ARP is initiated by a via or a plague take these factors into account.	Costa Rica
127.	106	Sustantivo	**Factores relacionados con las plagas que afectan al riesgo de plagas**	Eliminar: Estos factores son los que se toman en cuanta al realizar un Análisis de Riesgo y están normados en las NIMF para tel efecto. (NIMF 2, NIMF 11, NIMF 21). Ya sea que el ARP se inicie por una via o por un plagas se toman en consideración estos factores.	Costa Rica
128.	107	Substantive	Pest-related factors that should be taken into consideration include:	These factors are taken into account when performing a risk analysis and are regulated in ISPMs for this purpose. (ISPM 2, ISPM 11, ISPM 21). Whether the ARP is initiated by a via or a plague take these factors into account.	Costa Rica
129.	107	Sustantivo	Los factores relacionados con las plagas que deberían tenerse en cuenta incluyen:	Estos factores son los que se toman encuenta al realizar un Análisis de Riesgo y están normados en las NIMF para tal efecto. (NIMF	Costa Rica

Com. #	Para #	Comment type	Comment	Explanation	Country
				2, NIMF 11, NIMF 21). Ya sea que el ARP se inicie por una via o por una plaga se toman en consideración estos factores.	
130.	108	Substantive	1. whether the pest occurs in the exporting country 2. type of pest (arthropod, fungus, virus, bacterium etc.) 3. potential for establishment and spread 4. potential economic impact 5. capacity of the pest to survive and multiply during transport and storage 6. reproduction rate and number of generations per year 7. mode of transmission (e.g. vector, graft transmission, mechanical transmission) 8. ability to detect the pest or, where relevant, its vector, even at low pest incidence 9. conditions required for symptom expression 10. host range of the pest 11. presence of host plants in the country of import 12. pest seasonality 13. latency of infection 14. availability of control measures 15. ~~feasibility of eradication or containment~~.	This point is not relevant to the objective of this standard as stated in paragraph 21. Whether a pest is easy to eradicate / contain or not has no bearing on the desire to stop spread in the first place	Australia
131.	108	Substantive	1. ~~whether the pest occurs in the exporting country~~ 2. ~~type of pest (arthropod, fungus, virus, bacterium etc.)~~ 3. ~~potential for establishment and spread~~ 4. ~~potential economic impact~~ 5. ~~capacity of the pest to survive and multiply during transport and storage~~ 6. ~~reproduction rate and number of generations per year~~ 7. ~~mode of transmission (e.g. vector, graft transmission, mechanical transmission)~~ 8. ~~ability to detect the pest or, where relevant, its vector, even at low pest incidence~~ 9. ~~conditions required for symptom expression~~ 10. ~~host range of the pest~~ 11. ~~presence of host plants in the country of import~~ 12. ~~pest seasonality~~	These factors are taken into account when performing a risk analysis and are regulated in ISPMs for this purpose. (ISPM 2, ISPM 11, ISPM 21). Whether the ARP is initiated by a via or a plague take these factors into account.	Costa Rica

Com. #	Para #	Comment type	Comment	Explanation	Country
			13. ~~latency of infection~~ 14. ~~availability of control measures~~ 15. ~~feasibility of eradication or containment.~~		
132.	108	Sustantivo	1. ~~si la plaga está presente en el país exportador~~r 2. ~~tipo de plaga (artrópodo, hongo, virus, bacteria, etc.)~~ 3. ~~potencial de establecimiento y dispersión~~ 4. ~~impacto económico potencial~~ 5. ~~capacidad de la plaga para sobrevivir y multiplicarse durante el transporte y almacenaje~~ 6. ~~tasade reproducción y número de generaciones por año~~ 7. ~~modo de transmisión (por ejemplo, vectores, transmisión por injerto, transmisión mecánica)~~ 8. ~~capacidadpara detectar la plaga o, si es relevante, su vector, incluso con baja incidencia de plaga~~ 9. ~~condiciones requeridas para la expresión de síntomas~~ 10. ~~rango dehospedantes de la plaga~~ 11. ~~presencia de hospedantes en el país de importación~~ 12. ~~estacionalidad de la plaga~~ 13. ~~latencia de la infección~~ 14. ~~disponibilidad de medidas de control~~ 15. ~~viabilidad de erradicación o contención~~	No es necesario enumerarlos, se tomen encuenta al aplicar las NIMF referentes a Analisis de Riesgo.	Costa Rica
133.	108	Technical	1. whether the pest occurs in the exporting country 2. type of pest (arthropod, fungus, virus, bacterium, nematode etc.) 3. potential for establishment and spread 4. potential economic impact 5. capacity of the pest to survive and multiply during transport and storage 6. reproduction rate and number of generations per year 7. mode of transmission (e.g. vector, graft transmission, mechanical transmission) 8. ability to detect the pest or, where relevant, its vector, even at low pest incidence 9. conditions required for symptom expression 10. host range of the pest	Nematodes are important target pest in plants for planting.	Korea Republic of

Com. #	Para #	Comment type	Comment	Explanation	Country
			11. presence of host plants in the country of import 12. pest seasonality 13. latency of infection 14. availability of control measures 15. feasibility of eradication or containment.		
134.	109	Sustantivo	**Factores relacionados con la planta que afectan al riesgo**		Costa Rica
135.	110	Substantive	The initial plant-related pest risk factors to be considered are plant species, cultivar and area of origin. Within any given plant species, there is a range of pest risk associated with the type of plant material moved including, as broadly ranked below from lowest to highest pest risk (recognizing that these rankings may vary depending on specific circumstances):	These factors are taken into account when performing a risk analysis and are regulated in ISPMs for this purpose. (ISPM 2, ISPM 11, ISPM 21). Whether the ARP is initiated by a via or a plague take these factors into account.	Costa Rica
136.	110	Sustantivo	Los factores iniciales de riesgode plaga relacionados con la planta que han de considerarse son la especie de planta, el cultivar y área de origen. Dentro de cualquier especie vegetal dada, existe un rango de riesgo de plaga asociado al tipo de material vegetal movilizado, incluyendo en términos generales lo clasificado a continuación de menor a mayor riesgo (reconociendo que el rango de esta clasificación podrá variar dependiendo de circunstancias específicas):	idem anterior	Costa Rica
137.	112	Substantive	In addition, pest risk usually increases with plant age, as older plants have had longer exposure to potential pests. Pest risk also increases with size because larger plants have a larger surface area exposed to pests and may also be more difficult to inspect and treat. However, age and size are not always correlated (e.g. artificial dwarfing or pests associated with specific plant growth stages). Increased size of a consignment and volume of trade usually increase chance of introduction of regulated pest.	Increased size of a consignment and volume of trade can influence the effectiveness of inspection.	Korea Republic of
138.	112	Technical	In addition, pest risk usually increases with plant age, as older plants have had longer exposure to potential pests. Pest risk also increases with size because larger plants have a larger surface area exposed to pests and may also be more difficult to inspect and treat. However, age and size are not always correlated (e.g. artificial dwarfing or pests associated with specific plant growth stages).	There is no scientific basis to check this situation, not necessarily a relationship of pest risk by age or size of the plant. Furthermore, in some early vegetative stages are more susceptible to attack by pests, of which there is scientific evidence. Nor is it valid to indicate that it is harder to inpeccionar or treatment. (You can plant imported small parts from large and old plants as cuttings or reed). Can be taken as OTC	Costa Rica
139.	112	Técnico	Adicionalmente, el riesgo de plagas incrementa a menudo con la edad de la planta, de	No existe sustento científico que compruebe	Costa Rica

Com. #	Para #	Comment type	Comment	Explanation	Country
			modo que las plantas de mayor edad han tenido una mayor exposición a plagas potenciales. El riesgo de plagas también incrementa con el tamaño porque plantas más grandes tienen una mayor superficie de exposición a plagas y podrán ser también más difíciles de inspeccionar y someter a tratamiento. Sin embargo, la edad y el tamaño no siempre se correlacionan (por ejemplo, enanismo artificial o plagas asociadas con etapas específicas de crecimiento de la planta).	esta situación, no necesariamente existe una relación de riesgo de plaga por edad o tamaño de la planta. Además en algunos estados vegetativos tempranos son más susceptibles al ataque de ciertas plagas, de lo cual existe evidencia científica. Tampoco es valido indicar que es más difícil de inpeccionar o de recibir tratamiento. (Pueden importarse partes pequeñas de plantas provenientes de plantas grandes o viejas como esquejes o cañas). Puede tomarse como OTC	
140.	115	Substantive	1. growing media 2. irrigation method and water source 3. growing conditions. 4. Comingling of different plant species	important factor to consider	United States of America
141.	119	Editorial	1. growth chamber 2. ~~glasshouse~~greenhouse 3. screen house 4. field grown in containers (pots, tubs etc.) 5. field grown 6. plants collected from the wild.	Glasshouse is a specific structure made of glass and does not include other structure of polycarbonate, plastic etc	Australia
142.	120	Editorial	Enclosures such as growth chambers, ~~glasshouses~~greenhouses and screen houses usually provide better control over plant material and better opportunity for pest exclusion than field-grown plants. Plants grown in containers with sterilized growing medium or grown on a membrane may afford some protection from soil-borne pests. Field-grown crops are generally subject to cultural and chemical pest control. Plants collected in the wild are unprotected from pests and potentially are of higher pest risk. Also aquatic plants produced with or without any substrate may carry specific risk for the transmission of pests. Production systems may not fit into one of the above categories and may comprise a combination of several growing conditions (e.g. wild collected plants being transplanted into containers for further growing in the field before export). Certification schemes require specific combinations of these factors and may provide specific safeguards.	'Glasshouse' is a specific structure made of glass and does not include other structure of polycarbonate, plastic etc.	Australia
143.	124	Substantive	NPPOs should take particular note of the risks associated with plants for planting to biodiversity and the environment (e.g. CITES).	This is not a phytosanitary issue, nor is CITES issues a good example of "risk". Delete this paragraph as it is not useful.	United States of America

<table>
<tr><th>Com. #</th><th>Para #</th><th>Comment type</th><th>Comment</th><th>Explanation</th><th>Country</th></tr>
<tr><td>144.</td><td>124</td><td>Technical</td><td>NPPOs should take particular note of the risks associated with plants for planting to biodiversity and the environment ~~(e.g. CITES)~~.</td><td>The reference to CITES is unclear and unnecessary.</td><td>EPPO
Norway
European Union
Belarus
Armenia
Azerbaijan</td></tr>
<tr><td>145.</td><td>127</td><td>Substantive</td><td>Table 1. Examples of measures that may be applied to reduce the pest risk of plants for planting at a place of production categorized by pest group (Pest groups may be overlapping, e.g. groups 1 and 3, and a variety of available measures may be required to adequately address pest risk.)</td><td>Measures will be determined by the importing country to address risk identified by prest risk analysis</td><td>Australia</td></tr>
<tr><td>146.</td><td>128</td><td>Editorial</td><td>
<table>
<tr><th></th><th>Pest group</th><th>Available measures</th></tr>
<tr><td>1</td><td>Pests causing latent infections and those that are likely to be transmitted by plants for planting without signs or symptoms</td><td>• Derivation from mother plants that have been tested and found free from the relevant pest
• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel, isolation in time (e.g. growing season) from a source of infestation (temporal isolation))
• Testing of samples of the plants for freedom from pests
• Production within a specified certification scheme or clean stock programme that controls the relevant pests
• Use of indicator plants
• Production of tissue cultures (including meristem tip cultures) which may eliminate pathogens.</td></tr>
<tr><td>2</td><td>Pests having stages and</td><td>• Growing season inspection for freedom from pests or symptoms (e.g. at timed</td></tr>
</table>
</td><td>9, last bullet: to be consistent with 8, last bullet.</td><td>EPPO
Norway
European Union
Belarus
Armenia
Azerbaijan</td></tr>
</table>

Com. #	Para #	Comment type	Comment			Explanation	Country
				symptoms that are visible during the growing season	intervals, for example monthly for the three months before export or at different growth stages) • Growing season inspection of the mother plants • Inspection after harvest to meet a specified tolerance level for a pest (e.g. tolerance for bulb rots by fungi/bacteria) • Pesticide applications • Ensuring appropriate conditions for symptom expression • Production within a specified certification scheme or clean stock programme that controls the relevant pests.		
				3 Pests spread by contact	• Prevention of contact with sources of infestation (e.g. other plants) • Hygiene measures for handling pruning tools and equipment between different batches/lots • Planning of activities in the place of production to work with plants of higher health first • Use of dedicated clothing and equipment in isolated places (e.g. screen houses) • Pesticide applications • Isolation from sources of infestation (e.g. buffer zone or geographical distance from		

Com. #	Para #	Comment type	Comment			Explanation	Country
					other host plants, physical isolation using a glasshouse or polytunnel, temporal isolation).		
			4	Pests transmitted by vectors	• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel, temporal isolation) • Pre-planting soil testing for freedom from or to meet a tolerance for soil-borne pests or their vectors • Pesticide treatments for control of insect vectors of pests (e.g. aphids).		
			5	Pests spread by wind	• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel) • Pesticide applications.		
			6	Pests spread by water	• Use of uncontaminated water sources, free of pests • Irrigation water to be disinfected or sterilized before use or reuse • Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel, temporal		

Com. #	Para #	Comment type	Comment			Explanation	Country
					isolation).		
			7	Soil-borne pests able to colonize the plant	• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel, growth of plants on raised benches, temporal isolation) • Derivation from mother plants that have been tested and found free from the relevant pest • Production within a specified certification scheme or clean stock programme • Testing of samples of the plants for freedom from pests • Pre-planting soil treatment or testing for freedom from pests such as fungi, nematodes, viruses transmissible by nematodes.		
			8	Soil-borne pests in growing medium attached to plants	• Growing medium to be sterilized before use • Use of inert growing media • Use of soil-less growing media • Isolation from sources of infestation, maintenance of plants in such a way that contact with soil is prevented (e.g. on raised benches) • Pesticide treatment (e.g. drench or		

<table>
<tr><th>Com. #</th><th>Para #</th><th>Comment type</th><th>Comment</th><th>Explanation</th><th>Country</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td></td><td></td><td>fumigation) prior to export
• Roots washed free from growing medium (and repotted in sterile growing medium in a sterile container).</td></tr>
<tr><td>9</td><td>Soil-borne pests in soil attached to plants</td><td>• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, temporal isolation)
• Pre-planting soil treatment or testing for freedom from pests (especially nematodes, fungi)
• Pesticide treatment (fumigation) prior to export
• Roots washed free from soil (and repotted in sterile growing medium in a sterile container).</td></tr>
</table>
</td><td></td><td></td></tr>
<tr><td>147.</td><td>128</td><td>Substantive</td><td>
<table>
<tr><td></td><td>Pest group</td><td>Available measures</td></tr>
<tr><td>1</td><td>Pests causing latent infections and those that are likely to be transmitted by plants for planting without signs or symptoms</td><td>• Derivation from mother plants that have been tested and found free from the relevant pest
• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel, isolation in time (e.g. growing season) from a source of infestation (temporal isolation))
• Testing of samples of the plants for</td></tr>
</table>
</td><td>also a measure (pest group 7 comment) same as in pest group 8 (pest group 9 comment)</td><td>Australia</td></tr>
</table>

Com. #	Para #	Comment type	Comment			Explanation	Country
					freedom from pests • Production within a specified certification scheme or clean stock programme that controls the relevant pests • Use of indicator plants • Production of tissue cultures (including meristem tip cultures) which may eliminate pathogens.		
			2	Pests having stages and symptoms that are visible during the growing season	• Growing season inspection for freedom from pests or symptoms (e.g. at timed intervals, for example monthly for the three months before export or at different growth stages) • Growing season inspection of the mother plants • Inspection after harvest to meet a specified tolerance level for a pest (e.g. tolerance for bulb rots by fungi/bacteria) • Pesticide applications • Ensuring appropriate conditions for symptom expression • Production within a specified certification scheme or clean stock programme that controls the relevant pests.	
			3	Pests spread by contact	• Prevention of contact with sources of infestation (e.g. other plants) • Hygiene measures for handling pruning tools and equipment between different		

Com. #	Para #	Comment type	Comment			Explanation	Country
					batches/lots • Planning of activities in the place of production to work with plants of higher health first • Use of dedicated clothing and equipment in isolated places (e.g. screen houses) • Pesticide applications • Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel, temporal isolation).		
			4	Pests transmitted by vectors	• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel, temporal isolation) • Pre-planting soil testing for freedom from or to meet a tolerance for soil-borne pests or their vectors • Pesticide treatments for control of insect vectors of pests (e.g. aphids).		
			5	Pests spread by wind	• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel)		

Com. #	Para #	Comment type	Comment			Explanation	Country
					• Pesticide applications.		
			6	Pests spread by water	• Use of uncontaminated water sources, free of pests • Irrigation water to be disinfected or sterilized before use or reuse • Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel, temporal isolation).		
			7	Soil-borne pests able to colonize the plant	• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel, growth of plants on raised benches, temporal isolation) • Derivation from mother plants that have been tested and found free from the relevant pest • Production within a specified certification scheme or clean stock programme • Testing of samples of the plants for freedom from pests • Pre-planting soil treatment or testing for freedom from pests such as fungi, nematodes, viruses transmissible by		

Com. #	Para #	Comment type	Comment			Explanation	Country
					nematodes. • clean soil-less growing media		
			8	Soil-borne pests in growing medium attached to plants	• Growing medium to be sterilized before use • Use of inert growing media • Use of soil-less growing media • Isolation from sources of infestation, maintenance of plants in such a way that contact with soil is prevented (e.g. on raised benches) • Pesticide treatment (e.g. drench or fumigation) prior to export • Roots washed free from growing medium (and repotted in sterile growing medium in a sterile container).		
			9	Soil-borne pests in soil attached to plants	• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, temporal isolation) • Pre-planting soil treatment or testing for freedom from pests (especially nematodes, fungi) • Pesticide treatment (fumigation) prior to export • Roots washed free from soil (and repotted in sterile growing		

<table>
<tr><th>Com. #</th><th>Para #</th><th>Comment type</th><th>Comment</th><th>Explanation</th><th>Country</th></tr>
<tr><td></td><td></td><td></td><td>medium in a sterile container).</td><td></td><td></td></tr>
<tr><td>148.</td><td>128</td><td>Substantive</td><td>
<table>
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• Testing of samples of the plants for freedom from pests
• Production within a specified certification scheme or clean stock programme that controls the relevant pests
• Use of indicator plants
• Production of tissue cultures (including meristem tip cultures) which may eliminate pathogens.</td></tr>
<tr><td>2</td><td>Pests having stages and symptoms that are visible during the growing season</td><td>• Growing season inspection for freedom from pests or symptoms (e.g. at timed intervals, for example monthly for the three months before export or at different growth stages)
• Growing season inspection of the mother plants
• Inspection after harvest to meet a specified tolerance level for a pest (e.g. tolerance for bulb rots by fungi/bacteria)</td></tr>
</table>
</td><td>For this kind of pest, it is more important the isolation from contaminated water sources. These examples do not apply to this type of pests</td><td>Paraguay</td></tr>
</table>

Com. #	Para #	Comment type	Comment			Explanation	Country
					• Pesticide applications • Ensuring appropriate conditions for symptom expression • Production within a specified certification scheme or clean stock programme that controls the relevant pests.		
			3	Pests spread by contact	• Prevention of contact with sources of infestation (e.g. other plants) • Hygiene measures for handling pruning tools and equipment between different batches/lots • Planning of activities in the place of production to work with plants of higher health first • Use of dedicated clothing and equipment in isolated places (e.g. screen houses) • Pesticide applications • Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel, temporal isolation).		
			4	Pests transmitted by vectors	• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel, temporal isolation) • Pre-planting soil testing for freedom from or to meet a tolerance for soil-borne pests or their vectors		

Com. #	Para #	Comment type	Comment			Explanation	Country
					• Pesticide treatments for control of insect vectors of pests (e.g. aphids).		
			5	Pests spread by wind	• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel) • Pesticide applications.		
			6	Pests spread by water	• Use of uncontaminated water sources, free of pests • Irrigation water to be disinfected or sterilized before use or reuse • Isolation from contaminated water sources ~~of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel, temporal isolation).~~ •		
			7	Soil-borne pests able to colonize the plant	• Isolation from sources of infestation (e.g. ~~buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel,~~ growth of plants on raised benches, temporal isolation) • Derivation from mother plants that have been tested and found free from the relevant pest • Production within a specified certification		

Com. #	Para #	Comment type	Comment			Explanation	Country
					scheme or clean stock programme • Testing of samples of the plants for freedom from pests • Pre-planting soil treatment or testing for freedom from pests such as fungi, nematodes, viruses transmissible by nematodes.		
			8	Soil-borne pests in growing medium attached to plants	• Growing medium to be sterilized before use • Use of inert growing media • Use of soil-less growing media • Isolation from sources of infestation, maintenance of plants in such a way that contact with soil is prevented (e.g. on raised benches) • Pesticide treatment (e.g. drench or fumigation) prior to export • Roots washed free from growing medium (and repotted in sterile growing medium in a sterile container).		
			9	Soil-borne pests in soil attached to plants	• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, temporal isolation) • Pre-planting soil treatment or testing for freedom from pests (especially nematodes, fungi)		

<table>
<tr><th>Com. #</th><th>Para #</th><th>Comment type</th><th>Comment</th><th>Explanation</th><th>Country</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td></td><td></td><td>• Pesticide treatment (fumigation) prior to export
• Roots washed free from soil (and repotted in sterile growing medium).</td></tr>
</table>
</td><td></td><td></td></tr>
<tr><td>149.</td><td>128</td><td>Technical</td><td>
<table>
<tr><td></td><td>Pest group</td><td>Available measures</td></tr>
<tr><td>1</td><td>Pests causing latent infections and those that are likely to be transmitted by plants for planting without signs or symptoms</td><td>• Derivation from mother plants that have been tested and found free from the relevant pest
• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel, isolation in time (e.g. growing season) from a source of infestation (temporal isolation))
• Testing of samples of the plants for freedom from pests
• Production within a specified certification scheme or clean stock programme that controls the relevant pests
• Use of indicator plants
• Production of tissue cultures (including meristem tip cultures) which may eliminate pathogens.</td></tr>
<tr><td>2</td><td>Pests having stages and symptoms that are visible during the</td><td>• Growing season inspection for freedom from pests or symptoms (e.g. at timed intervals, for example</td></tr>
</table>
</td><td>Drench is one of treatments and should be consistency with para 128, pest group 8, Soil-borne pests in growing medium attached to plants.</td><td>Japan</td></tr>
</table>

Com. #	Para #	Comment type	Comment			Explanation	Country
				growing season	monthly for the three months before export or at different growth stages) • Growing season inspection of the mother plants • Inspection after harvest to meet a specified tolerance level for a pest (e.g. tolerance for bulb rots by fungi/bacteria) • Pesticide applications • Ensuring appropriate conditions for symptom expression • Production within a specified certification scheme or clean stock programme that controls the relevant pests.		
				3 Pests spread by contact	• Prevention of contact with sources of infestation (e.g. other plants) • Hygiene measures for handling pruning tools and equipment between different batches/lots • Planning of activities in the place of production to work with plants of higher health first • Use of dedicated clothing and equipment in isolated places (e.g. screen houses) • Pesticide applications		

Com. #	Para #	Comment type	Comment			Explanation	Country
					• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel, temporal isolation).		
			4	Pests transmitted by vectors	• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel, temporal isolation) • Pre-planting soil testing for freedom from or to meet a tolerance for soil-borne pests or their vectors • Pesticide treatments for control of insect vectors of pests (e.g. aphids).		
			5	Pests spread by wind	• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel) • Pesticide applications.		
			6	Pests spread by water	• Use of uncontaminated water sources, free of pests • Irrigation water to be disinfected or		

Com. #	Para #	Comment type	Comment			Explanation	Country
					sterilized before use or reuse • Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel, temporal isolation).		
			7	Soil-borne pests able to colonize the plant	• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, physical isolation using a glasshouse or polytunnel, growth of plants on raised benches, temporal isolation) • Derivation from mother plants that have been tested and found free from the relevant pest • Production within a specified certification scheme or clean stock programme • Testing of samples of the plants for freedom from pests • Pre-planting soil treatment or testing for freedom from pests such as fungi, nematodes, viruses transmissible by nematodes.		
			8	Soil-borne pests in	• Growing medium to be sterilized		

Com. #	Para #	Comment type	Comment			Explanation	Country
				growing medium attached to plants	before use • Use of inert growing media • Use of soil-less growing media • Isolation from sources of infestation, maintenance of plants in such a way that contact with soil is prevented (e.g. on raised benches) • Pesticide treatment (e.g. drench or fumigation) prior to export • Roots washed free from growing medium (and repotted in sterile growing medium in a sterile container).		
				9 Soil-borne pests in soil attached to plants	• Isolation from sources of infestation (e.g. buffer zone or geographical distance from other host plants, temporal isolation) • Pre-planting soil treatment or testing for freedom from pests (especially nematodes, fungi) • Pesticide treatment (e.g. drench or fumigation) prior to export • Roots washed free from soil (and repotted in sterile growing medium).		
150.	129	Technical	**Table 2**. Examples of measures to reduce the pest risk of plants for planting based on the			redundant with Table 1 and unclear	Korea

<table>
<tr><th>Com. #</th><th>Para #</th><th>Comment type</th><th>Comment</th><th>Explanation</th><th>Country</th></tr>
<tr><td></td><td></td><td></td><td>type of plant material</td><td></td><td>Republic of</td></tr>
<tr><td>151.</td><td>130</td><td>Technical</td><td>
<table>
<tr><th>Type of plant broadly ranked according to pests risk material*</th><th>Examples of pest types</th><th>Available measures</th></tr>
<tr><td>Meristem culture and in vitro culture</td><td>Viruses and virus-like diseases, bacteria, fungi, stem nematodes, mites and insects</td><td>• Derivation from mother plants that have been tested and found free from the relevant pest
• Cultivation in sterile medium under sealed aseptic conditions
• Testing of samples of the plants for freedom from pests.</td></tr>
<tr><td>Unrooted cuttings</td><td>Insects, viruses, bacteria, fungi and other pests</td><td>See groups 1 to 7 in Table 1
• Hot water</td></tr>
</table>
</td><td>If table 2 is not deleted, the name of first column would be modified for clarity.</td><td>Korea Republic of</td></tr>
</table>

Com. #	Para #	Comment type	Comment	Explanation	Country
			<table><tr><td></td><td></td><td>treatment.</td></tr><tr><td>Budwood/graftwood</td><td>Bacteria and viruses, fungi, insects and other pests</td><td>See groups 1 to 7 in Table 1</td></tr><tr><td>Bulbs and tubers, root fragments, root cuttings, rootlets or rhizomes</td><td>Nematodes, viruses, bacteria, fungi, insects and other pests</td><td>See groups 1 to 7 Table 1 Hot water dipping to control nematodes.</td></tr><tr><td>Bare root plants</td><td>Nematodes and all other pests of the aerial plant part</td><td>See groups 1 to 7 in Table 1</td></tr><tr><td>Rooted cuttings</td><td>Nematodes, insects, viruses and bacteria and other pests</td><td>Measures depend *inter alia* on the pest risk of the growing medium used. See groups 1 to 7 in Table 1</td></tr><tr><td>Plants in growing media excluding soil</td><td>Nematodes and all other pests of the aerial plant part</td><td>See groups 1 to 9 in Table 1</td></tr><tr><td>Plants in soil</td><td>Nematodes and all other pests of the aerial plant part</td><td>See groups 1 to 9 in Table 1</td></tr></table> * broadly ranked from lowest (top) to highest (bottom) pest risk (recognizing that these ranking may vary depending on specific circumstances)		
152.	134	Substantive	1. detection of quarantine pests or regulated non-quarantine pests (above set tolerance levels) of concern to the importing country on plants in or from the place of production 2. failure to undertake required laboratory tests or analyses or correctly follow procedures to identify pests 3. failure to carry out control measures at the place of production for	Deleted text is confusing because it seems to be cases of non-compliance and not non-conformities.	Paraguay

Com. #	Para #	Comment type	Comment	Explanation	Country
			regulated pests 4. failure to notify the NPPO of the exporting country of the presence of regulated pests at the place of production 5. ~~export of ineligible plant taxa, plants from non-authorized origins, or plants not meeting phytosanitary import requirements~~ 6. failure to correctly list the botanical names of all the plants on documents accompanying consignments 7. failure to keep consistent pest management records as required in the place of production manual and pest management programme 8. failure to keep consistent records of country of origin of plant material 9. failure to undertake ordered corrective actions within the specified time period 10. failure to perform internal audits as required 11. operating without adequately trained personnel, designated responsible person or plant protection specialist 12. significant modification of the place of production manual or pest management practices without prior approval from the NPPO of the exporting country 13. failure to examine incoming or outgoing plant material 14. failure to keep plants for planting that have been examined for export separate from other plant material that has not been examined 15. failure to maintain an effective pest management programme 16. failure to maintain sanitation management practices at the place of production 17. failure to periodically provide personnel with relevant training 18. failure to maintain an up-to-date list and training records of all personnel involved in implementing the place of production manual 19. failure to consistently sign and date reports or records 20. failure to record relevant changes to the lists of plant taxa produced, their location in the place of production and the plant material to be exported 21. failure to detect and record low-level populations of pests 22. failure to inform the NPPO of the exporting country of any changes to management practices outlined in the place of production manual.		