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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 *Systems approach for pest risk management of fruit flies* (Tephritidae)

Agenda item 8.1.2 of the Provisional Agenda

1. The Secretariat compiled a total of 60 member comments received 14 days prior to CPM-7 on the draft ISPM *Systems approach for pest risk management of fruit flies* (Tephritidae), presented to the CPM-7 as document CPM 2012/04/Attachment02, from the following 19 members:

Argentina
Armenia
Australia
Azerbaijan
Belarus
Bolivia (Plurinational State of)
Brazil
Canada
Chile
COSAVE
Costa Rica
EPPO
European Union
Japan
Paraguay
Peru
Republic of Korea
United States of America
Uruguay

COMPILED MEMBER COMMENTS - 14 DAYS PRIOR TO CPM-7

Draft ISPM *Systems approach for pest risk management of fruit flies* (Tephritidae) (2004-022)

(CPM 2012/04/Attachment02)

Comment #.	Para. #	Comment type	Comment	Explanation	Country
1.	G	Editorial	a FF SA	Do not use 'an' FF SA, use 'a'	Australia
2.	G	Substantive		This document should not be a stand-alone standard. It does not really provide any new guidance on systems approaches beyond what is already laid out in ISPM No. 14. It should be an annex to ISPM 14 -- it describes factors to consider in a systems approach for fruit flies, but the main guidance still comes from ISPM 14.	United States of America
3.	6	Editorial	Esta norma ~~ofrece~~ proporciona las directrices para la elaboración, implementación y verificación de medidas integradas en un enfoque de sistemas para elmanejode riesgos de plagas de moscas de la fruta (Tephritidae) de importancia económica.	Estan dos sinonimos juntos "ofrece" y "proporciona", por lo tanto, eliminar "ofrece"	Costa Rica
4.	6	Technical	This standard provides guidelines for the development, implementation and verification of integrated measures in a systems approach as an option for pest risk management of fruit flies (Tephritidae) of economic importance.	To be consistent with ISPM 14	COSAVE Uruguay Paraguay Brazil Bolivia Peru Chile Argentina
5.	8	Substantive	**IPPC**. *International Plant Protection Convention*. Rome, IPPC, FAO. **ISPM 2.** 2007.*Framework for pest risk analysis*. Rome, IPPC, FAO.	Delete reference to NIMF 13, is not cited in the text	Costa Rica

			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 13.** 2001. *Guidelines for the notification of non-compliance and emergency action.*Rome, IPPC, FAO.~~ **ISPM 14**. 2002.*The use of integrated measures in a systems approach for pest risk management*. Rome, IPPC, FAO. **ISPM 24.**2005*. Guidelines for the determination and recognition of equivalence of phytosanitary measures.* Rome, IPPC, FAO. **ISPM 26**. 2006.*Establishment of pest free areas for fruit flies (Tephritidae)*. Rome, IPPC, FAO.		
6.	8	Sustantivo	CIPF.*Convención Internacional de Protección Fitosanitaria*, Roma, CIPF, FAO. NIMF 2. 2007.*Marco para el análisis de riesgo de plagas*. Roma, CIPF, FAO. NIMF 5.*Glosario de términos fitosanitarios*. Roma, CIPF, FAO. NIMF 11. 2004.*Análisis de riesgo de plagas para plagas cuarentenarias, incluido el análisis de riesgos ambientales y organismos vivos modificados*, Roma, CIPF, FAO. ~~NIMF 13. 2001.*Directrices para la notificación del incumplimiento y acción de emergencia*. Roma, CIPF, FAO.~~ NIMF 14. 2002.*Aplicación de medidas integradas en un enfoque de sistemas para el manejo de riesgo de plagas*. Roma, CIPF, FAO. NIMF 24. 2005.*Directrices para la determinación y el reconocimiento de la equivalencia de las medidas fitosanitarias*. Roma, CIPF, FAO. NIMF 26. 2006.*Establecimiento de áreas libres de plagas para*	Eliminar referenca a la NIMF 13, por cuanto, no se encuentra citada en el texto	Costa Rica

			moscas de la fruta(*Tephritidae*). Roma, CIPF, FAO.		
7.	12	Editorial	For the development of a systems approach for fruit flies (FF SA), the relationship between host, target fruit fly species and the area of production of the host fruits and vegetables1 should be considered. The options for pest risk management measures should be determined by means of pest risk analysis (PRA).	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
8.	13	Editorial	An FF SA includes at least two independent measures, which may be applied throughout various stages of the process, specifically during the growing period and harvest; post-harvest and ~~shipping~~transportation; and entry and distribution within the importing country. An FF SA may establish an area of low pest prevalence or temporary or localized pest absence of the target fruit fly species in combination with other measures (such as host selection, crop management practices or post-harvest handling) to reduce pest risk to meet the phytosanitary requirements of the importing country.	Consistency with change already made in paragraphs 36 and 48.	EPPO European Union Belarus Armenia Azerbaijan
9.	13	Substantive	An FF SA includes at least two independent measures, which may be applied throughout various stages of the process, specifically during the growing period and harvest; post-harvest and transportation~~shipping~~; and entry and distribution within the importing country. An FF SA may establish an area of low pest prevalence or temporary or localized pest absence of the target fruit fly species in combination with other measures (such as host selection, crop management practices or post-harvest handling) to reduce pest risk to meet the phytosanitary requirements of the importing country.	To be consistence with paragraph 48	Paraguay Brazil Bolivia Peru COSAVE Uruguay Chile Argentina
10.	13	Technical	An FF SA includes at least two independent measures, which may be applied throughout various stages of the process, specifically during the growing period and harvest; post-harvest and shipping; and entry and distribution within the importing country. An FF SA may ~~establish~~ be developed in an area of low pest prevalence or temporary or localized pest absence of the target fruit fly species in combination with other measures (such as host selection, crop management practices or post-harvest handling) to reduce pest risk to meet the phytosanitary requirements of the importing country.	The use of the term "establish" can be interpreted as a condition to develop a SA.	COSAVE Uruguay Paraguay Peru Brazil Bolivia Chile Argentina
11.	13	Technical	An FF SA includes at least two independent measures, which may be applied throughout various stages of the process, specifically during the growing period and harvest; post-harvest and shipping; and entry and distribution within the importing country. An FF SA may establish an area of low pest prevalence or temporary or localized pest absence of the target fruit fly species in combination with other measures (such as ~~host~~ selection of less susceptible hosts, crop management practices or post-harvest handling) to reduce pest risk to meet the	Clearer wording consistent with paragraph 44.	EPPO European Union Belarus Armenia Azerbaijan

			phytosanitary requirements of the importing country.		
12.	13	Technical	Systems approaches are a process to manage risk throughout a production chain, from pre-planting through distribution and end - use of a commodity. An FF SA includes at least two independent measures, which may be applied throughout various stages of the process, specifically during the growing period and harvest; post-harvest and shipping; and entry and distribution within the importing country. An FF SA may establish an area of low pest prevalence or temporary or localized pest absence of the target fruit fly species in combination with other measures (such as host selection, crop management practices or post-harvest handling) to reduce pest risk to meet the phytosanitary requirements of the importing country.	Need to first describe what 'process' is being discussed, then go on to discuss the process.	United States of America
13.	14	Technical	For development, implementation and verification of an FF SA, operational procedures are necessary. Conformity with these procedures ~~the import requirements~~ should be ensured and verified by the national plant protection organization (NPPO) of the exporting country. Procedures should be monitored during the implementation and corrective actions should be taken in case of non-conformity.	"Conformity" is related to procedures and "compliance" is related to phytosanitary import requirements.	Paraguay Brazil Peru Bolivia COSAVE Uruguay Chile Argentina
14.	15	Substantive	The development, implementation and verification of an FF SA should be adequately documented and the documentation reviewed and updated when necessary by the exporting NPPO.	clear that the exporting NPPO should do this	United States of America
15.	17	Editorial	Many species of fruit flies of the family Tephritidae are pests of economic importance and their introduction may pose a pest risk. To identify and manage the target fruit fly species risk, a PRA should be conducted and phytosanitary measures may be applied (ISPM 2:2007, ISPM 11:2004).	more correct	United States of America
16.	17	Technical	Many fruit flies of the family Tephritidae are pests of economic importance and their introduction may pose a pest risk. To identify and manage the target fruit fly species risk, a PRA should be conducted by the importing country and phytosanitary measures may be applied (ISPM 2:2007, ISPM 11:2004).	The importing country conducts a PRA to determine its phytosanitary import requirements.	EPPO European Union Belarus Armenia Azerbaijan
17.	19	Substantive	~~A systems approach requiresa combination of at least two measures that are independent of each other, and may include any number of measures that are dependent on each other (ISPM 14:2002). Treatments used in an FF SA are those not considered sufficiently efficacious to be applied as a single measure. The measures may be applied in different places at different times and may therefore involve a number of organizations and individuals.~~	This paragraph is neither useful or correct. It doesn't provide anything that isn't already stated in ISPM 14. Moreover, the statements regarding treatments are not entirely correct. A treatment may be efficacious, but there are many reasons a systems approach could be used even if an efficacious treatment exists. Suggest	United States of America

				to remove the paragraph entirely.	
18.	20	Editorial	Often, countries have used phytosanitary measures such as treatments or pest free areas for fruit flies (FF-PFAs) (ISPM 26:2006) to support ~~for~~ import or movement of host fruit. In other cases, prohibition has been applied. An FF SA may be an alternative to facilitate the export and movement of fruit fly hosts into endangered areas. NPPOs may recognize FF SAs as being equivalent to single measures. In cases where an effective FF SA has been implemented, components of those systems may be used by other importing and exporting countries to facilitate the movement of fruit from areas with similar conditions.	You can't use a phytosanitary measure to import or move fruit – you use a truck or ship.	EPPO European Union Belarus Armenia Azerbaijan
19.	20	Substantive	Often, countries have used phytosanitary measures such as treatments or pest free areas for fruit flies (FF-PFAs) (ISPM 26:2006) for import or movement of host fruit. In other cases, prohibition has been applied. An FF SA may be an alternative to facilitate the export and movement of fruit fly hosts into endangered areas. NPPOs may recognize FF SAs as being equivalent to single measures. The exporting country should seek formal approval of equivalence of these measures with importing country. In cases where an effective FF SA has been implemented, components of those systems may be used by other importing and exporting countries to facilitate the movement of fruit from areas with similar conditions.	Equivalence between single measures and systems approach should be officially recognized by the importing country.	Korea Republic of
20.	20	Substantive	Often, countries have used phytosanitary measures such as treatments or pest free areas for fruit flies (FF-PFAs) (ISPM 26:2006) for import or movement of host fruit. In other cases, prohibition has been applied. An FF SA may be an alternative to facilitate the export and movement of fruit fly hosts into endangered areas. NPPOs may recognize FF SAs as being equivalent to single measures. ~~In cases where an effective FF SA has been implemented, components of those systems may be used by other importing and exporting countries to facilitate the movement of fruit from areas with similar conditions.~~	This statement is not entirely correct. It is not just the environmental conditions that would have to be similar. The infrastructure and the functioning of the NPPOs would have to be similar as well. A systems approach may lend itself to another situation, but unless everything else is identical, it probably would not apply in a different country.	United States of America
21.	24	Technical	It is the responsibility of the importing country to establish and communicate its technically justified phytosanitary import requirements. A combination of pest risk management measures integrated into an FF SA is one of the options that the importing country may select as a the basis for phytosanitary import requirements (ISPM 14:2002).	For consistence with the ISPM 14	Paraguay Brazil Bolivia COSAVE Uruguay Peru Chile Argentina

22.	26	Substantive	1. The importing country, in its phytosanitary import requirements, specifies a systems approach to be used in the exporting country. 2. ~~The importing country does not explicitly require a systems approach, but the NPPO of the exporting country deems a systems approach to be a suitable and effective approach for achieving the importing country's phytosanitary import requirements. The exporting country may need to negotiate formal approval of the equivalence of measures with the importing country (ISPM 24:2005).~~	This paragraph reads incorrectly. The exporting country may propose a systems approach but that does not obligate the importing country to accept it. In general these things are negotiated bilaterally.	United States of America
23.	27	Substantive	An FF SA should have the appropriate number and combination of the measures and those should be scientifically sound and be selected to meet the phytosanitary import requirements, which in turn should take into account the principles of technical justification, minimal impact, transparency, non-discrimination and ~~,~~ equivalence ~~and operational feasibility~~. ~~Aspects of operational feasibility include cost-effectiveness of the measures to be applied while seeking to impose the least restrictive measures necessary to manage target fruit fly species risks.~~	Operational feasibility is not one of the principles of ISPM 1: Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade. Last sentence of this paragraph should be remove if reference to "operational feasibility" is removed from the previous sentence.	Canada
24.	27	Substantive	An FF SA should have the appropriate ~~number and~~ combination of the measures to achieve the appropriate level of protection. ~~and those sho~~They should~~uld~~ be scientifically sound and be selected to meet the phytosanitary import requirements, ~~which in turn should take into account the principles of technical justification, minimal impact, transparency, non-discrimination, equivalence and operational feasibility.~~ Aspects of operational feasibility include cost-effectiveness of the measures to be applied while seeking to impose the least restrictive measures necessary to manage target fruit fly species risks.	Measures should be scientifically sound and reach ALOP. That's all this section needs to say.	United States of America
25.	30	Editorial	Basic information required for the development of an FF SA includes the following:	to clarify	Paraguay Brazil Bolivia Peru COSAVE Chile Uruguay Argentina
26.	31	Substantive	• The host should be identified to the species level. In cases, where risk varies with the variety ~~(e.g. because of varying resistance to infestation)~~, hosts should be identified to variety	"Resistance to infestation" is not a term related to fruit flies and deleted text is only an example that can be	Paraguay Brazil Bolivia COSAVE Chile Argentina

			level. • The stage of development of the fruit being examined is relevant (e.g. mature hard green bananas are recognized as not being suitable hosts for fruit flies). • Data on the target fruit fly species associated with the host should be available (such as scientific name, pest incidence and its fluctuation, and host preference). • The fruit production area defined for implementing an FF SA should be described and adequately documented with particular attention to host ~~prevalence and~~ distribution in commercial areas as well as non-commercial areas if appropriate.	deleted The term prevalence is used for pest and not for host Not always will be necessary to document host distribution in non commercial areas	Uruguay Peru
27.	31	Substantive	• The host should be identified to the species level. In cases, where risk varies with the variety (e.g. because of varying resistance to infestation), hosts should be identified to variety level. • The stage of ~~development~~ maturity of the fruit being examined is relevant ~~(e.g. mature hard green bananas are recognized as not being suitable hosts for fruit flies).~~ • Data on the target fruit fly species associated with the host should be available (such as scientific name, pest incidence and its fluctuation, and host preference). • The fruit production area defined for implementing an FF SA should be described and adequately documented with particular attention to host prevalence and distribution in commercial areas as well as non-commercial areas.	remove example, it is not correct to say "mature hard green bananas"---that is a contradiction in terms	United States of America
28.	34	Editorial	The development, implementation and verification of an FF SA should be properly documented ~~and properly recorded by~~by the NPPO of the exporting country and made available to the NPPO of the importing country on request. The roles and responsibilities of the NPPO of the exporting and importing countries should be specified and documented. The documentation and records should be reviewed and updated regularly, maintained for at least 24 months and made available to the NPPO of the importing country upon request.		United States of America

29.	34	Substantive	The development, implementation and verification of an FF SA should be documented and properly recorded by the NPPO and any agents implementing the system under the authority of the NPPO of the exporting country. The roles and responsibilities of the NPPO of the exporting and importing countries should be specified and documented. The documentation and records should be reviewed and updated regularly, maintained for at least 24 months and made available to the NPPO of the importing country upon request.	Other authorised agencies, persons may be authorised to implement elements of the system by the NPPO consistent with other fruit fly standards	Australia
30.	36	Substantive	• phytosanitary import requirements and, if available, a report of the pest risk analysis • Identify and describe the measures for reducing risk • description of the requirements for an FF SA's operational procedures • description of the area intended for an FF SA • description of host fruit to be exported and target fruit fly species • details of the organizations involved and their roles and responsibilities and any linkages, including for example: o registration of organizations involved or stakeholders o agreement to cooperate in surveillance and control procedures o conformity with FF SA requirements (origin of fruit, movement from place of production, selection and packing of fruit, transportation and safeguarding of the fruit) o agreement to take appropriate corrective actions o keeping records and making them available • pest surveillance and control programme • survey results • training programme for the FF SA. ~~operators~~ • traceability procedures • technical basis for specific procedures • survey, detection and diagnostic methodology • description of corrective actions and records of follow-up • reviews of the implementation of an FF SA	This information should be explicitly spelled out	United States of America

			• contingency plans.		
31.	39	Substantive	The NPPO of the exporting country has the responsibility to monitor the implementation and the effectiveness of all stages of an FF SA. In cases where the operational procedures of an FF SA were properly implemented, but one or more of the components did not provide sufficient pest management to give the required effectiveness of all stages, a revision of an FF SA should be conducted to ensure that phytosanitary import requirements are met. ~~This revision may not necessarily involve the suspension of trade. Other components of an FF SA may not need to be verified again.~~Exports may be suspended pending a review to determine the reason for failure.	If the systems approach is not working, the importing country can suspend imports.	United States of America
32.	39	Technical	The NPPO of the exporting country has the responsibility to monitor the implementation and the effectiveness of all stages of an FF SA. In cases where the operational procedures of an FF SA were properly implemented, but one or more of the components did not provide sufficient pest management to give the required effectiveness of all stages, a revision of an FF SA should be conducted to ensure that phytosanitary import requirements are met. This revision may not necessarily involve the suspension of trade. ~~Other components of an FF SA may not need to be verified again.~~ The frequency of verification should be influenced by the design of the FF SA.	Last sentence of paragraph 39 implies that verification is performed once rather than being a continous processs. The frequency of verification may be influenced by the design of the fruit fly system approach.	Canada
33.	42	Substantive	**2.1 Development of an FF SA**	Suggest to move this entire section up to the beginning of the document so the document reads: Develop FF SA, then decide to implement, then document and verify. It is more logical that the FF SA is developed FIRST, THEN it is documented and verified, etc. As it reads now, the first thing you do is covered last in the document.	United States of America
34.	44	Substantive	Pre-planting • selecting planting sites with low pest incidence of target fruit fly species (e.g. areas of low pest prevalence, areas	More correct	United States of America

			unsuitable because of geographic location, altitude, climate) • selection of resistant or less susceptible species or varieties • sanitation • managing hosts other than the crop • intercropping with non-fruit fly host plants • growing host fruit during specific periods when ~~the pest incidence of~~ target fruit fly species is low or temporally absent.		
35.	44	Technical	Pre-planting • selecting planting sites with low pest incidence of target fruit fly species (e.g. areas of low pest prevalence, areas unsuitable because of geographic location, altitude, climate) • selection of ~~resistant or~~ less susceptible fruit species or varieties • sanitation • managing hosts other than the crop • intercropping with non-fruit fly host plants • growing host fruit during specific periods when the pest incidence of target fruit fly species is low or temporally absent.	"Resistance to infestation" is not an expression related to fruit flies	Paraguay Brazil Bolivia Peru COSAVE Chile Argentina Uruguay
36.	45	Substantive	Growing period • flowering control and timing fruit production • managing the target fruit fly species to low pest incidence • chemical control such as insecticide bait treatments, bait stations, male annihilation technique and biological control such as natural enemies • physical protection mechanisms (e.g. bagging fruit, fruit fly protected structures) • sterile insect technique • mass trapping	management of fruit flies to low pest incidence is not a harvest function only and is more over arching to also include the period under cultivation	Canada

			• management of non-commercial hosts within the production area (e.g. elimination or replacement of other host plants by non-host plants where appropriate) • monitoring and survey of the target fruit fly species e.g. using traps or fruit sampling • sanitation (i.e. collection, removal and appropriate disposal of fallen fruit from the orchard or removal of mature fruit from the tree after harvest season) • fruit stripping.		
37.	45	Technical	Growing period • flowering control and timing fruit production • chemical control such as insecticide bait treatments, bait stations, male annihilation technique and biological control such as natural enemies • physical protection mechanisms (e.g. bagging fruit, fruit fly protected structures) • sterile insect technique • mass trapping • management of non-commercial hosts within the production area- what is meant by production area? (e.g. elimination or replacement of other host plants by non-host plants where appropriate) • monitoring and survey of the target fruit fly species e.g. using traps or fruit sampling • sanitation (i.e. collection, removal and appropriate disposal of fallen fruit from the orchard or removal of mature fruit from the tree after harvest season) • fruit stripping.	5th bullet: as the term "production area" is not defined in ISPM 5, it is unclear if production area includes land under cultivation/to be harvested only or whether it includes a broader area which may include an appropriate buffer zonesurrounding the cultivated area	Canada

38.	45	Technical	Growing period • flowering control and timing fruit production • chemical control such as insecticide bait treatments, bait stations, male annihilation technique and biological control such as natural enemies • physical protection mechanisms (e.g. bagging fruit, fruit fly protected structures) • sterile insect technique • mass trapping • management of non-commercial hosts within the production area (e.g. elimination or replacement of other host plants by non-host plants where appropriate) • monitoring and survey of the target fruit fly species e.g. using traps or fruit sampling • sanitation (i.e. collection, removal and appropriate disposal of fallen fruit from the orchard or removal of mature fruit from the tree ~~after harvest season~~) • fruit stripping.	This measure is included in the last bullet of harvest section	Paraguay Brazil Bolivia Peru COSAVE Chile Argentina Uruguay
39.	46	Editorial	Harvest • harvest at a specific stage of fruit development or time of the year • safeguarding activities to prevent infestation at harvest • managing the target fruit fly species to low pest incidence • surveillance including fruit cutting • sanitation (e.g. safe removal and disposal of fallen fruit) ~~.~~	For consistency with the para 45	Japan
40.	46	Technical	Harvest • harvest at a specific stage of fruit development or time of the year	Managing fruit flies to low pest incidence is not necessarily a harvest function only and this is more over arching to also include the period under cultivation as well or even possibly longer if the FF SA	Canada

			• safeguarding activities to prevent infestation at harvest • managing the target fruit fly species to low pest incidence • surveillance including fruit cutting • sanitation • safe removal and disposal of fallen fruit.	incorporates ALPP techniques	
41.	47	Editorial	Post-harvest and handling • safeguarding activities to prevent infestation for example, processing in screen-protected packing rooms, warehouses and transit conveyances, using cold storage, wrapping of fruit • monitoring for target fruit fly species absence by trapping in packing houses • sanitation (e.g. ~~in packing houses)~~removal of fruit with signs of infestation (culling) in packing house) • sampling, inspection (e.g. by fruit cutting) or testing • treatments that are not considered sufficiently efficacious as a single measure • packing requirements (e.g. using insect-proof packages) • ensuring traceability of lots.	For consistency with the para 45	Japan
42.	47	Substantive	Post-harvest and handling • safeguarding activities to prevent infestation for example, processing in screen-protected packing rooms, warehouses and transit conveyances, using cold storage, wrapping of fruit • monitoring for target fruit fly species absence by trapping in and around packing houses • sanitation (e.g. in packing houses) • removal of fruit with signs of infestation (culling) in packing house • sampling, inspection (e.g. by fruit cutting) or testing • treatments that are not considered sufficiently efficacious as	Cull piles and other waste material around packing houses are a potential risk source	Australia

			a single measure • packing requirements (e.g. using insect-proof packages) • ensuring traceability of lots.		
43.	47	Substantive	Post-harvest and handling • safeguarding activities to prevent infestation for example, processing in screen-protected packing rooms, warehouses and transit conveyances, using cold storage, wrapping of fruit • monitoring for target fruit fly species absence by trapping in packing houses • sanitation (e.g. in packing houses) • removal of fruit with signs of infestation (culling) in packing house • sampling, inspection (e.g. by fruit cutting) or testing • ~~treatments that are not considered sufficiently efficacious as a single measure~~ • packing requirements (e.g. using insect-proof packages) • ensuring traceability of lots.	this bullet seems out of context and should be removed	Canada
44.	47	Substantive	Post-harvest and handling • safeguarding activities to prevent infestation for example, processing in screen-protected packing rooms, warehouses and transit conveyances, using cold storage, wrapping of fruit • monitoring for target fruit fly species absence by trapping in packing houses • sanitation (e.g. in packing houses) • removal of fruit with signs of infestation (culling) in packing house • sampling, inspection (e.g. by fruit cutting) or testing • ~~treatments that are not considered sufficiently efficacious as a single measure~~ • packing requirements (e.g. using insect-proof packages)	This is not a requirement for implementing a SA. You may have a single treatment available but still wish to implement an SA for many different reasons. Remove this point as it is misleading.	United States of America

			• ensuring traceability of lots.		
45.	47	Technical	Post-harvest and handling • safeguarding activities to prevent infestation for example, chilling fruit, refrigerated transport, processing in screen-protected packing rooms, warehouses and transit conveyances, using cold storage, wrapping of fruit • monitoring for target fruit fly species absence by trapping in packing houses • sanitation (e.g. in packing houses) • removal of fruit with signs of infestation (culling) in packing house • sampling, inspection (e.g. by fruit cutting) or testing • treatments that are not considered sufficiently efficacious as a single measure • packing requirements (e.g. using insect-proof packages) • ensuring traceability of lots.	additional examples are mitigatiing measures that can be used in post-harvest and handling	Canada
46.	48	Editorial	Transportation and distribution • safeguarding activities to prevent target fruit fly species infestation • treatments that are not considered sufficiently efficacious as a single measure (prior to, during or after transport) • distribution limited geographically or seasonally to areas where target fruit fly species cannot establish.	To clarify	Paraguay
47.	48	Editorial	Transportation anddistribution • safeguarding activities to prevent target fruit fly species infestation • treatments that are not considered sufficiently efficacious as a single measure (prior to, during or after transport)	3rd bullet about "Distribution": Some words have to be added to correspond to "distribution limited seasonally".	EPPO European Union Belarus Armenia Azerbaijan

			• distribution limited geographically or seasonally to areas where or periods when target fruit fly species cannot establish.		
48.	48	Editorial	Transportation and distribution • safeguarding activities to prevent target fruit fly species infestation • treatments that are not considered sufficiently efficacious as a single measure (prior to, during or after transport) • distribution limited geographically or seasonally to areas where target fruit fly species cannot establish.	To clarify	Brazil Bolivia Peru COSAVE Chile Argentina Uruguay
49.	48	Substantive	Transportation anddistribution • safeguarding activities to prevent target fruit fly species infestation • treatments that are not considered sufficiently efficacious as a single measure (prior to, during or after transport) • distribution limited geographically or seasonally to areas where target fruit fly species cannot establish or where suitable hosts are not available in the protected area.	If potential host material is not available in the PRA area, the risk is reduced to almost zero	Australia
50.	48	Substantive	Transportation anddistribution • safeguarding activities to prevent target fruit fly species infestation • ~~treatments that are not considered sufficiently efficacious as a single measure (prior to, during or after transport)~~ • distribution limited geographically or seasonally to areas where target fruit fly species cannot establish.	this bullet seems out of context and should be removed	Canada
51.	48	Substantive	Transportation anddistribution	We could not identify any example of a treatment applied during	Paraguay Brazil Bolivia Peru COSAVE Chile Argentina

			• safeguarding activities to prevent target fruit fly species infestation • ~~treatments that are not considered sufficiently efficacious as a single measure (prior to, during or after transport)~~ • distribution limited geographically or seasonally to areas where target fruit fly species cannot establish.	transportation and distribution that is not considered sufficiently efficacious as a single measure, as mentioned in this bullet	Uruguay
52.	49	Technical	Measures applied to several or all stages: • community awareness programmes to generate support from the public • movement control of host fruit and other pathways into the area (e.g. requirements for production sites or islands).	second bullet could be broader eg. considering the pest pathway rather than just fruit as a means of transporting pests	Canada
53.	54	Substantive	Non-conformity involves incorrect implementation or system failure of an FF SA. In such cases, the NPPO of the exporting country may suspend the trade from the non-conforming component of the FF SA until corrective actions have been taken to address the non-conformity. Non-conformity may occur in one or more stages of an FF SA. It is important to identify at which stage the non-conformity has occurred.	An FF SA may fail if it is incorrectly implemented, but may simply fail for other reasons even if all the steps are followed.	United States of America
54.	55	Editorial	The NPPO of the exporting~~importing~~ country should ~~be~~ promptly provide~~notified~~ of any non-conformity and corrective action being taken to the NPPO of the importing country .	To clarify the responsibility of exporting country	Japan
55.	55	Substantive	The NPPO of the importing country should be promptly notified of any non-conformity that may have affected exports and of corrective action being taken.	In case no exports have taken place and corrective actions have taken place by the NPPO of the exporting country one could wonder why the NPPO of the importing country should be notified.	EPPO Belarus Armenia Azerbaijan
56.	55	Substantive	The NPPO of the importing country should be promptly notified of any non-conformity that may have affected exports and of corrective action being taken.	In case no exports have taken place and corrective actions have taken place by the NPPO of the exporting country one could wonder why the NPPO of the importing country should be notified. Only "critical"	European Union

				non-conformities should be notified.	
57.	55	Substantive	The NPPO of the importing country should be promptly notified of any non-conformity and corrective action being taken. The NPPO of importing country should notify the NPPO of the exportin g country of any non-compliances (see ISPM 13:2001).	It is necessary responsibility and should be consistency with the para 100 of draft ISPM " Integrated measures for the production of plants for planting in international trade".	Japan
58.	55	Substantive	The NPPO of the importing country ~~should~~ may be ~~promptly~~ notified of any non-conformity and corrective action being taken.	Not always non-conformities should be promptly notified. The NPPO of exporting country will notify non-conformities that it deems necessary.	Paraguay Brazil Bolivia Peru COSAVE Chile Argentina Uruguay
59.	55	Technical	When required, the ~~The~~ NPPO of the importing country should be promptly notified of any non-conformity and corrective action being taken.	Practically, it is only reasonable if potentially infested fruit was certified and shipped due to a failure of the FF SA. Then prompt notification of the importing NPPO is appropriate. Otherwise, it would be an administrative burden.	Canada
60.	56	Editorial	[1]Fruits and vegetables hereafter are referred to as fruits.	move to page 1	Korea Republic of