**2005-001: PRA for Plants - proposed Annex to ISPM 11**

| **Comment no.** | **Paragraph no.** | **Comment type** | **Comment** | **Explanation** | **Language** | **Country** |
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| 1. | *G* | Editorial | Throughout the text: the singular of "plants as pests" should be "plant as a pest" NOT "plant as pest" | Correct English | English | EPPO |
| 2. | *G* | Editorial | Throughout the text: the singular of "plants as pests" should be "plant as a pest" NOT "plant as pest" | Correct English | English | EPPO, European Union, Georgia, Norway, Russian Federation, Belarus |
| 3. | *G* | Editorial | We have carefully gone through the document and are satisfied with content and changes made |  | English | Sierra Leone |
| 4. | *G* | Substantive | The proposed annex provide necessary guidance for assessing plants as quarantine pests and should therefore be considered for adoption. | This Annex has been reviewed and found adequate to provide guidance in conducting PRA on plants as quarantine pests. The peculiarities and integrities in assessment of risks associated with plants as quarantine pests have been clearly explained as related to the 3 stages of PRA. | English | Ghana |
| 5. | *1* | Substantive | **ISPM 11: PEST RISK ANALYSIS FOR QUARANTINE PESTS INCLUDING ENVIRONMENTAL RISKS AND LIVING MODIFIED ORGANISMS** | The revision suggested has aligned the title of the annex to the ISPM title. | English | Kenya |
| 6. | *13* | Editorial | S2 **CBD.** 1992. *Convention on Biological Diversity*. Montreal, CBD.  S2 **CBD.** 2000. *Cartagena Protocol on Biosafety to the Convention on Biological Diversity*. Montreal, CBD.  **ICPM.** 2001. *Report of the Third Interim Commission on Phytosanitary Measures, Rome, 2–6 April 2001*. Rome, IPPC, FAO.  **ICPM.** 2005. *Report of the Seventh Interim Commission on Phytosanitary Measures, Rome 4–7 April 2005*. Rome, IPPC, FAO.  **IPPC**. 1997. *International Plant Protection Convention*. Rome, IPPC, FAO.  **ISPM 1**. 1993. *Principles of plant quarantine as related to international trade*. Rome, IPPC, FAO. [published 1995] [revised; now ISPM 1: 2006]  **ISPM 2.** 2007. *Framework for pest risk analysis*. Rome, IPPC, FAO.S2 **ISPM 3**. 1995. *Code of conduct for the import and release of exotic biological control agents***.** Rome, IPPC, FAO. [published 1996] [revised; now ISPM 3: 2005]  **ISPM 4**. 1995. *Requirements for the establishment of pest free areas*. Rome, IPPC, FAO. [published 1996]  **ISPM 5**. *Glossary of phytosanitary terms*. Rome, IPPC, FAO.  S2 **ISPM 5 Supplement 1**. 2001. *Guidelines on the interpretation and application of the concept of official control for regulated pests*. Rome, IPPC, FAO.  S2 **ISPM 5 Supplement 2.** 2003. *Guidelines on the understanding of* potential economic importance *and related terms including reference to environmental considerations*. Rome, IPPC, FAO.  **ISPM 6**. 1997. *Guidelines for surveillance*. Rome, IPPC, FAO.  **ISPM 7**. 1997. *Export certification system*. Rome, IPPC, FAO.  **ISPM 8**. 1998. *Determination of pest status in an area*. Rome, IPPC, FAO.  **ISPM 10**. 1999. *Requirements for the establishment of pest free places of production and pest free production sites*. Rome, IPPC, FAO.  S2 **ISPM 12**. 2001. *Guidelines for phytosanitary certificates*. Rome, IPPC, FAO.  **ISPM 32.** 2009. *Categorization of commodities according to their pest risk*. Rome, IPPC, FAO.  **WTO**. 1994. *Agreement on the Application of Sanitary and Phytosanitary Measures*. Geneva, World Trade Organization.S2  **Zaid, A., Hughes, H.G., Porceddu, E. & Nicholas, F.** 2001. *Glossary of biotechnology for food and agriculture.* FAO Research and Technology Papers, 9. Rome, FAO. | References deleted because there are not cited in the text | English | COSAVE, Chile, Brazil, Paraguay, Argentina, Uruguay |
| 7. | *29* | Editorial | S1 The initiation points frequently refer to “pests”. The IPPC defines a pest as “any species, strain or biotype of plant, animal, or pathogenic agent, injurious to plants or plant products.” In applying these initiation points to the specific case of plants as pests, it is important to note that the plants concerned should satisfy this definition. Pests directly affecting plants satisfy this definition. In addition, many organisms indirectly affecting plants also satisfy this definition (such as plants as pests, e.g. weeds, invasive alien plants). The fact that they are injurious to plants can be based on evidence obtained in an area where they occur. In the case of organisms where there is insufficient evidence that they affect plants indirectly, it may nevertheless be appropriate to assess on the basis of available pertinent information, whether they are potentially injurious in the PRA area by using a clearly documented, consistently applied and transparent system. This is particularly important for plant species or cultivars that are imported for planting. | For clarity since the organisms have been specified in the preceding sentence | English | Ghana |
| 8. | *29* | Substantive | S1 The initiation points frequently refer to “pests”. The IPPC defines a pest as “any species, strain or biotype of plant, animal, or pathogenic agent, injurious to plants or plant products.” In applying these initiation points to the specific case of plants as pests, it is important to note that the plants concerned should satisfy this definition. Pests directly affecting plants satisfy this definition. In addition, many organisms indirectly affecting plants also satisfy this definition (such as plants as pests, e.g. weeds,/ invasive alien plants). The fact that they are injurious to plants can be based on evidence obtained in an area where they occur. In the case of organisms where there is insufficient evidence that they affect plants indirectly, it may nevertheless be appropriate to assess on the basis of available pertinent information, whether they are potentially injurious in the PRA area by using a clearly documented, consistently applied and transparent system. This is particularly important for plant species or cultivars that are imported for planting. | Invasive plants is used in other sections of ISPM 11 (Sections 1.1; 2.3.1; 3.4 and Annex 1). For consistency it should be used in this paragraph. In addition the term "invasive alien plant" is not a defined term. | English | COSAVE, Chile, Brazil, Paraguay, Argentina, Uruguay |
| 9. | *29* | Substantive | S1 The initiation points frequently refer to “pests”. The IPPC defines a pest as “any species, strain or biotype of plant, animal, or pathogenic agent, injurious to plants or plant products.” In applying these initiation points to the specific case of plants as pests, it is important to note that the plants concerned should satisfy this definition. Pests directly affecting plants satisfy this definition. In addition, many organisms indirectly affecting plants also satisfy this definition (such as plants as pests, e.g. weeds, invasive alien plants). The fact that they are injurious to plants can be based on evidence obtained in an area where they occur by assessing the nature of damage/impact. In the case of organisms where there is insufficient evidence that they affect plants indirectly, it may nevertheless be appropriate to assess on the basis of available pertinent information, whether they are potentially injurious in the PRA area by using a clearly documented, consistently applied and transparent system. This is particularly important for plant species or cultivars that are imported for planting. |  | English | Uganda |
| 10. | *102* | Editorial | S1 With respect to a plant being assessed as a pest with indirect effects, wherever a reference is made to a host or a host range, this should be understood to refer instead in relation to a suitable habitat1 in the PRA area. | To clarify the sentence. | English | Ghana |
| 11. | *104* | Substantive | S1 For plants for planting proposed for import, the probability of entry need not be assessed. Following import, the plants may be planted and maintained in a particular location, probably in substantial numbers and for an indeterminate period. The pest risk may arise if there is a possibility that the plant may spread from the location where the plants are intended to grow and establish in the endangered area. Accordingly, section 2.2.3 may be considered before section 2.2.2. | This is unclear and confusing. Some plants may only last a growing season, other plants may last longer. In addition, it is not clear what "substantial numbers" are or "indeterminate period" is. Suggest deleting as it is not helpful. | English | United States of America |
| 12. | *104* | Technical | S1 For plants for planting proposed for import, the probability of entry need not be assessed. Following import, the plants may be planted and maintained in a particular location, probably in substantial numbers and for an indeterminate period. The pest risk may arise if there is a possibility that the plant may spread from the location where the plants are intended to grow and establish in the endangered area. Accordingly, section 2.2.3 may be considered before section 2.2.2.  Before entry the characteristics of the plant must be assessed to identify the probability of it being invasive. If the plant is allowed to enter the new location, it is probable that after establishment, it may be difficult to eradicate. |  | English | Uganda |
| 13. | *111* | Editorial | S1 The probability of entry need not be assessed for plants that are proposed for import. However, the probability of entry needs to be assessed for pests that may be carried by such plants (e.g. contaminating seeds carried with seeds imported for planting). | Clarification for first sentence. It makes confusing whether imported plant need to be assessed or not. | English | Belarus |
| 14. | *134* | Editorial | S1 In the case of plants as pests, the assessment of the probability of establishment concerns focuses on their establishment in habitats other than where they are intended to grow. | for clarity | English | Ghana |
| 15. | *134* | Substantive | S1 In the case of plants as pests, the assessment of the probability of establishment concerns their establishment in habitats other than where they are intended to grow.  There should be a clear distinction between the effect of plants pests eg weeds and invasive plant species. In case of invasive plants a different system is used to determine the probability of the plant becoming invasiv eg. reporductive potential, suitability of th environment etc. |  | English | Uganda |
| 16. | *135* | Substantive | Specific guidance on the probability of establishment of plants as quarantine pests is provided in Annex 4. | for consistency | English | Ghana |
| 17. | *158* | Substantive | S1 In the case of plants as quarantine pests, the assessment of spread concerns focuses on spread from the location where the plants are intended to grow or from the intended use to the endangered area. | for consistency and clarity | English | Ghana |
| 18. | *159* | Substantive | Specific guidance on probability of spread of plants as quarantine pests is provided in Annex 4. | For consistency | English | Ghana |
| 19. | *225* | Substantive | Specific guidance on pest risk management for plants as quarantine pests is provided in Annex 4. | For consistency | English | Ghana |
| 20. | *279* | Substantive | Specific guidance on risk communication for plants as quarantine pests is provided in Annex 4. | For consistency | English | Ghana |
| 21. | *338* | Substantive | This annex provides specific guidance for conducting pest risk analysis (PRA) to determine if a plant is a quarantine pest of cultivated or wild plants, whether it should be regulated, and to identify phytosanitary measures that reduce the pest risk to an acceptable level. It focuses primarily on plants proposed for import, whether as plants for planting or for other intended uses. It does not cover the unintentional introduction of plants as contaminants in commodities or conveyances. | For consistency | English | Ghana |
| 22. | *342* | Technical | Thus, the protection of plants as pursued through the IPPC may include considering certain plants as pests, and taking phytosanitary measures to prevent their introduction and spread. Determining which plants are pests is context-specific and may vary with geography, habitat, land use, time and the perceived value of the natural resources in the endangered area. PRA should form the basis of such a determination and subsequent decisions regarding possible regulation of the plant species as a quarantine pest. It should be noted that plants having undergone such analysis may also require assessment of their potential to be pathways for other pests. | This is the scope of this annex. | English | EPPO, European Union, Georgia, Norway, Russian Federation, Belarus |
| 23. | *343* | Technical | The IPPC has recognized the importance of plants as pests by underscoring that the definition of “pest” includes weeds (ICPM, 2001), and by specifically including “plants that are invasive alien species” in a range of recommendations for action for those invasive alien species that are pests of plants (ICPM, 2005). This annex provides some specific guidance on how to apply these recommendations. The 2004 revision of ISPM 11 addressed some introduced specific elements of conducting a PRA for plants as pests that are further elaborated in this annex. | The revision of ISPM 11 regarding the analysis of environmental risks by the ICPM in 2004 newly introduced specific elements for plants as pests in this ISPM. This "milestone" is not reflected well by "addressed some specific elements". | English | EPPO, European Union, Georgia, Norway, Russian Federation, Belarus |
| 24. | *344* | Substantive | The IPPC is concerned with pests injurious to cultivated and wild plants (see Annex 1 of this standard), and therefore weeds and invasive alien plants that are injurious to other plants should be considered pests in the IPPC context. Henceforth in this annex, the terms “weed” and “invasive alien plants” are not used, but only the single term “plants as pests”2. | See explanation in paragraph 29 | English | COSAVE, Chile, Brazil, Paraguay, Argentina, Uruguay |
| 25. | *348* | Substantive | The PRA process for plants as quarantine pests will most frequently arise in situations such as: | For consistency | English | Ghana |
| 26. | *349* | Editorial | 1. a request is made or anticipated to import a plant not previously imported 2. a plant already available and used in a country is suspected of posing a pest risk 3. a decision is made to review or revise phytosanitary policies. | To clarify | English | COSAVE, Chile, Brazil, Paraguay, Argentina, Uruguay |
| 27. | *349* | Substantive | 1. a request is made or anticipated to import a plant not previously imported 2. a plant already available and used in a country is suspected of posing a pest risk 3. a request is made or anticipated to change the use or extent of planting of a plant present in a country (e.g. an ornamental plant proposed for biofuel production) 4. a decision is made to review or revise phytosanitary policies. | the proposed addiition to the initiation points is not otherwise adressed and is an important element that needs to be considered | English | Canada |
| 28. | *353* | Editorial | ***Identity of the plant (refer to section 2.1.1.1)*** | More precise | English | EPPO |
| 29. | *353* | Editorial | ***Identity of the plant (refer to section 2.1.1.1)*** | More precise | English | EPPO, European Union, Georgia, Norway, Russian Federation, Belarus |
| 30. | *356* | Substantive | 1. The taxonomic identity of the plant may be unclear because it has been obscured by breeding or hybridization, or is the subject of plant breeders’ right. This is particularly relevant for horticultural plants. The NPPO should acquire the best possible information about the identity and parentage of the plant from various sources (e.g. the prospective importer, plant breeders, scientific literature). 2. The use of taxonomic levels below the species (i.e. subspecies, variety, cultivar) may be justified if there is scientific evidence demonstrating that differences in characteristics are stable and significantly affect phytosanitary status. Examples may include differences in adaptability to environmental conditions, ability to exploit resources, ability to defend against herbivores, and methods of reproduction or propagule dispersal. 3. The evaluation of a hybrid should be based on information specific to that hybrid where available. Where such information does not exist, a PRA may be conducted on the parent species to determine their pest risk. This approach should be used with caution as hybrids do not always express similar characteristics to their parent species, or behave the same way. This would significantly increase the uncertainty inherent in the assessment. However, in the absence of information about a hybrid, if If either parent is determined to be a pest and the associated risk is deemed unacceptable, this information may form the basis of the risk assessment. | There are many examples of hybrids not behaving as expected based on parent characteristics and a cautionary note to this effect would be preferable in the standard. | English | Canada |
| 31. | *357* | Editorial | ***Presence or absence in the PRA area (refer to section 2.1.1.2)*** | Missing word. | English | EPPO, European Union, Georgia, Norway, Russian Federation, Belarus |
| 32. | *359* | Substantive | The NPPO may categorize plants only planted in collections (such as botanical gardens) as absent, provided that they are under official control. | The question of whether plants only found in collections may be deemed absent seems irrelevant if official control is undertaken anyway. Thus, the current paragraph could create more confusion than clarity. Furthermore, the word ‘planted’ would be imprecise, if the intent was also to encompass seed collections. Furthermore, the current wording could be mistaken as if also referring to export situations, creating a conceptually too restrictive notion. For the exporting country, official control of collections etc. would be an unjustified and unnecessary extra burden. The entire discussion of pests only found in collections and the designation as present/absent should be dealt with horizontally in reviewing ISPM 8, - although it is recognized that is particularly important with plants as pests. | English | EPPO, European Union, Georgia, Norway, Russian Federation, Belarus |
| 33. | *363* | Editorial | In the case of plants for planting, significant human effort is made to ensure their continuous survival and successful reproduction. Furthermore, the plants for planting have often been selected to be well suited for growing in the importing country and to derive other benefits. This significantly increases the likelihood of establishment and spread. Therefore, plants for planting are generally considered to pose the highest risk. Examples of uses, broadly in the order of decreasing risk at the time of planting, are: |  | English | Uganda |
| 34. | *363* | Technical | In the case of plants for planting, significant human effort is made to ensure their continuous survival and, in some cases, their successful reproduction. Furthermore, the plants for planting have often been selected to be well suited for growing in the importing country. This significantly increases the likelihood of establishment and spread. Therefore, plants for planting are generally considered to pose the highest risk. Examples of uses, broadly in the order of decreasing risk at the time of planting, are: | Reproduction of the plants is sometimes not the aim of such efforts | English | EPPO, European Union, Georgia, Norway, Russian Federation, Belarus |
| 35. | *365* | Editorial | Plants for other intended uses than plants for planting may be considered, including for human consumption or animal feed, processing, combustion for energy production or scientific research. |  | English | Uganda |
| 36. | *365* | Editorial | Plants for other intended uses than plants for planting may be considered, including for human consumption or animal feed, processing, combustion for energy production or research. | redundant text | English | EPPO, European Union, Georgia, Norway, Russian Federation, Belarus |
| 37. | *377* | Technical | 1. *climate:* suitability of current climates and for long-lived plants, future projected climates 2. *other abiotic factors:* soil characteristics, topography, hydrology, natural fires etc. 3. *biotic factors:* current vegetation, degree of disturbance, presence or absence of natural enemies and competitors 4. *cultural practices in crops or managed plant communities:* herbicide usage, harvesting, soil cultivation, burning etc., including side-effects such as aerial deposition of nitrogen or pesticides. | In the main body of the text, ISPM 11 states that climate suitability should be assessed as part of establishment (2.2.2.2) and climate should be considered as a direct effect on consequences (2.3.1.1) but the consideration of climate change is not part of ISPM 11 (possibly it should be?). However, since it is important to take climate change into account when assessing the potential establishment of long-lived plants, this factor should be included in this annex. the change proposed explains why the annex is at variance with the main text | English | EPPO, European Union, Georgia, Norway, Russian Federation, Belarus |
| 38. | *378* | Technical | Where the history of a particular plant as pest is not well documented, the assessment should consider intrinsic characteristics of the plant that may predict establishment (refer to section 2.2.2.4). Although intrinsic characteristics have oftensometimes been shown to be poor predictors, the following may be considered: | If they are often poor predictors, then they should not be included as criteria for risk assessment. But because these types of criteria ARE OFTEN considered in weed risk assessments, they must be better predictors than they are not. "Sometimes" is a more accurate term. | English | United States of America |
| 39. | *385* | Editorial | 1. intended use, consumer demand, economic value and ease of transport 2. the movement of propagules to new areas with clothing, conveyances, machinery, tools, equipment 3. the movement of propagules as a contaminant of soil or other materials 4. plants being discarded (e.g. after flowering or when private aquaria are emptied) 5. waste disposal procedures (e.g. composting) for waste that contains plants. 6. Human medicine |  | English | Uganda |
| 40. | *389* | Technical | Plants as pests may have a variety of economic consequences, including yield losses in agriculture, horticulture and forestry, reduction ofnegative impacts on recreational value or reduction of biodiversity and negative effects on other parts of the ecosystem. Assessment of economic consequences of plants as pests may be inherently difficult because they may have broad agricultural, environmental and social consequences that may be non-specific, not readily apparent or not easily quantified (e.g. changes in the soil’s nutrient profilenon market values). | More correct wording | English | United States of America |
| 41. | *394* | Technical | 1. requirements for growing plants under confinement 2. requirements for harvesting plants at a certain stage or specified time to prevent opportunities for reproduction 3. restriction of plants to particular localities, such as those that are marginally suitable 4. import restricted to specified cultivars or clones 5. restrictions on the disposal of excess or waste plant material 6. other restrictions on sale, holding, transport, planting, growing or disposal 7. considering the use of codes of conduct for sale, holding, transport, planting or disposal, for example, in the form of internal rules or guidelines within the plant industry to refrain from or restrict the selling of particular plants for specific intended uses. | Including an important management option to make the list exhaustive. | English | EPPO, European Union, Georgia, Norway, Russian Federation, Belarus |
| 42. | *396* | Substantive | In identifying risk management options, the suitability of control measures, ease of detection, identification and access to the plants, time needed for effective control and difficulty of containment/eradication should be considered. For example, plants in highly managed systems such as cropping systems may be more easily controlled than plants in natural or semi-natural habitats, or in private gardens. Many of the factors considered under “establishment” and “spread” also influence a plant’s response to control measures and thus the feasibility of control. |  | English | Uganda |
| 43. | *396* | Substantive | In identifying risk management options, the suitability of control measures, ease of detection, identification and access to the plants, time needed for effective control and difficulty of containment should be considered. For example, plants in highly managed systems such as cropping systems may be more easily controlled than plants in natural or semi-natural habitats, or in private gardens. Many of the factors considered under “establishment” and “spread” also influence a plant’s response to control measures and thus the feasibility of control.  In case plants are assessed that are present in collections (e.g. botanical gardens) and import regulation is considered, official control may have to be applied that includes those collections [attach footnote].  [Footnote]: It is noted that for the purpose of export certification of commodities from areas where plants are present only in collections (e.g. botanical gardens) that are regulated by importing countries, NPPOs may consider such plants as not present. | In case there are concerns of spread of plants as pests from collections, official control may need to extend official control to such collections. In particular, botanical gardens in many countries have proven to be (involuntary) sources of spread of plants as pests. The footnote serves to explain ‘in passing’ that, even if official control may be justified and necessary for import and domestic regulation, it should not lead to the situation that an exporting country would have to deem such plants as present if they are held only in collections. Such a demand would be an unjustified and unnecessary extra burden. | English | EPPO, Georgia, Russian Federation, Belarus |
| 44. | *396* | Substantive | In identifying risk management options, the suitability of control measures, ease of detection, identification and access to the plants, time needed for effective control and difficulty of containment should be considered. For example, plants in highly managed systems such as cropping systems may be more easily controlled than plants in natural or semi-natural habitats, or in private gardens. Many of the factors considered under “establishment” and “spread” also influence a plant’s response to control measures and thus the feasibility of control.  [To become 396bis]: In case the assessed plants are present in collections (e.g. botanical gardens) and import regulation is considered, phytosanitary measures may have to include official of those collections [attach footnote].  [To become footnote]: It is noted that for the purpose of phytosanitary certification, the NPPO of the exporting country may consider plants that are present only in collections (e.g. botanical gardens) as not present. | In case there are concerns of spread of plants as pests from collections, official control may need to extend official control to such collections. In particular, botanical gardens in many countries have proven to be (involuntary) sources of spread of plants as pests. The footnote serves to explain ‘in passing’ that, even if official control may be justified and necessary for import and domestic regulation, it should not lead to the situation that an exporting country would have to deem such plants as present if they are held only in collections. Such a demand would be an unjustified and unnecessary extra burden. | English | European Union |
| 45. | *396* | Substantive | In identifying risk management options, the suitability of control measures, ease of detection, identification and access to the plants, time needed for effective control and difficulty of containment should be considered. For example, plants in highly managed systems such as cropping systems may be more easily controlled than plants in natural or semi-natural habitats, or in private gardens. Many of the factors considered under “establishment” and “spread” also influence a plant’s response to control measures and thus the feasibility of control.  In case plants are assessed that are present in collections (e.g. botanical gardens) and import regulation is considered, official control may have to be applied that includes those collections [attach footnote].  [Footnote]: It is noted that for the purpose of export certification of commodities from areas where plants that are regulated by importing countries, are present only in collections (e.g. botanical gardens) , NPPOs may consider such plants as not present. | In case there are concerns of spread of plants as pests from collections, official control may need to extend official control to such collections. In particular, botanical gardens in many countries have proven to be (involuntary) sources of spread of plants as pests. The footnote serves to explain ‘in passing’ that, even if official control may be justified and necessary for import and domestic regulation, it should not lead to the situation that an exporting country would have to deem such plants as present if they are held only in collections. Such a demand would be an unjustified and unnecessary extra burden. | English | Norway |
| 46. | *397* | Substantive | Irrespective of risk management options, where the import of a plant is allowed, it may be appropriate to develop post-entry systems such as surveillance for rapid response mechanisms in the PRA area, contingency plans and systems to report new occurrences. |  | English | Uganda |
| 47. | *404* | Substantive | Footnote 2Invasive alien plants, in the CBD sense, are plants introduced by human agency and threatening biodiversity (see ISPM 5, Appendix 1 (2009)). The term “weed” usually refers to pests of cultivated plants. However, some countries use the term “weed” irrespective of whether cultivated plants or wild flora are at risk, and other countries use the term “noxious weed”, “landscape weed”, “environmental weed” or similar terms to distinguish them from plants only affecting crops. | According to changes suggested in paragraph 344. | English | COSAVE, Chile, Brazil, Paraguay, Argentina, Uruguay |