**2009-002: Revision of ISPM 4:1995 Requirements for the establishment of pest free areas 2012-12-18**

| **Comm. no.**  | **Para. no.**  | **Comment type**  | **Comment**  | **Explanation**  | **Language**  | **Country**  | **Steward's Response**  |
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| 1.  | *G*  | Editorial  | I support the document as it is and I have no comments   |    | English  | Jordan, Mexico, Ghana |    |
| 2.  | *G*  | Substantive  | 21.  Es importante considerar la inclusión del tema plan de acciones correctivas en el área libre 2. .Sería conveniente contemplar dentro de las tareas del equipo de expertos la discusión de realizar un estudio de factibilidad técnico económico previo a la declaratoria 3.Se sugiere considerar los tiempos de aplicación de medidas correctivas que permitan el mantenimiento del área libre (ej:Numero de ciclos de vida, periodo de latencia e incububación del patogeno)                 | 1.El contar con un plan de acciones correctivas permitirá actuar oportunamente en el caso en que sea detectado un brote de la plaga regulada. 2.La declaratoria, mantenimiento y reconocimiento de un ALP conlleva costos elevados que deberían ser analizados previo a la declaratoria de un área nueva con el fin de evaluar la pertinencia o no de llevar a cabo la declaratoria.   | Español  | Colombia  |    |
| 3.  | *6*  | Editorial  | ISPM 4:1995 on *Requirements for the establishment of pest free areas* was adopted by the twenty-eighth Session of the FAO Conference in November 1995. Since its adoption, ISPM 4:1995 has been used by many contracting parties to the International Plant Protection Convention (IPPC) with respect to the establishment and use of pest free areas (PFAs).   | missing letter   | English  | EPPO, Netherlands, Russian Federation, Morocco, United Kingdom, Slovenia, Belarus  |    |
| 4.  | *7*  | Editorial  | Given that ISPM 4:1995 was adopted almost two decades ago , a revision of this standard should be consideredis now pertinent. In addition, the Commission on Phytosanitary Measures (CPM) has subsequently adopted new standards dealing with PFAs (e.g. ISPM 26:2006, ISPM 29:2007) and new concepts such as *areas of low pest prevalence* (ALPP; ISPM 22:2005, ISPM 30:2008), and *pest free production sites* and *pest free places of production* (ISPM 10:1999). Hence, the revision should provide more consistentrefined guidance on the establishment and maintenance of PFAs.    | The proposed wording is less judgmental.   | English  | EPPO, Netherlands, Russian Federation, Morocco, United Kingdom, Slovenia, Belarus  |    |
| 5.  | *7*  | Substantive  | Given that ISPM 4:1995 was adopted almost two decades ago , a revision of this standard is now pertinent. In addition, the Commission on Phytosanitary Measures (CPM) has subsequently adopted new standards dealing with PFAs (e.g. ISPM 26:2006, ISPM 29:2007) and new concepts such as *areas of low pest prevalence* (ALPP; ISPM 22:2005, ISPM 30:2008), and *pest free production sites* and *pest free places of production* (ISPM 10:1999). Hence, the revision should provide more refined guidance on the establishment and maintenance of PFAs.    | ALPP, PFPS and PFPP are not related to pest free areas. Moreover, ALPP is ot a new concept, this concept is in the SPS agreement and in the new Revised Text of the IPPC   | English  | Uruguay, COSAVE, Argentina, Brazil, Paraguay, Peru  |    |
| 6.  | *9*  | Substantive  | The revision of ISPM 4:1995 should modify the text to take into account other relevant IPPC standards and new concepts contained in those standards. The review should also consider improvements to the text based on contracting parties’ experiences in implementing the standard.   | See comment in paragraph 7   | English  | Uruguay, COSAVE, Argentina, Brazil, Paraguay, Peru  |    |
| 7.  | *10*  | Substantive  | **Tasks**Add an article for the tasks : ”provide the guidance and standards for suspending、breaking off and recovery of PFAs ”   | Because suspending、breaking off and recovery of PFAs may take place if pests concerned are present by surveillance, or confirmed colonization and ability absence for maintenance of PFAs, or eradication.   | English  | China  |    |
| 8.  | *12*  | Editorial  | (1) identify other relevant standards and identify ﻿whetherhow  information and concepts contained in those standards should be incorporated into the revision of ISPM 4:1995   | better writting   | English  | EPPO, Netherlands, Russian Federation, Morocco, United Kingdom, Slovenia, Belarus  |    |
| 9.  | *12*  | Substantive  | (1) identify other relevant standards and identify how information and concepts contained in those standards should be incorporated into the revision of ISPM 4:1995﻿Related standards (e.g. ISPM 10, 22, 26, 29, 30) should be incorporated into revised ISPM 4as its annexes. In this case, the title should be modified appropriately.   | The standards should be explicit and easy to understand in view of proper application and implementation by all NPPOs. Currentlythere are many standards related to establishing pest free areas and relevant concepts. Therefore, relevant standards should be restructured at the time of revision of ISPM 4.   | English  | Japan  |    |
| 10.  | *13*  | Substantive  | (2) provide information on establishment and maintenance of PFAs ( including surveillance) and considering experiences of contracting parties in implementing ISPM 4:1995 and how regulatory control of PFAs has evolved since the standard was adopted. Review all the information and make improvements to the standard based on this analysis   | Regarding "how regulatory control of PFAs has evolved", is this relevant to the standard?   | English  | United States of America  |    |
| 11.  | *14*  | Editorial  | (3) taking into account ISPM 6:1997 (Guidelines for surveillance), review the sections on surveillance for establishment and maintenance of PFAs and make recommendations for improvements as appropriate. Take into account ISPM 6:1997 (Guidelines for surveillance) when considering surveillance for PFAs   | suggestion for better writing   | English  | EPPO, Netherlands, Russian Federation, Morocco, United Kingdom, Slovenia, Belarus  |    |
| 12.  | *14*  | Substantive  | (4) consider the need for legal requirements to be put in place to control and monitor the movement of commodities in PFAs. (﻿5) recommend guidance to assist in managing PFAs, including public awarness campaigns for all stakeholders in the supply chain (such as producers, merchants, shippers)﻿(6) Consider and provide information on the use of buffer zones(3) review the sections on surveillance for establishment and maintenance of PFAs and make recommendations for improvements as appropriate. Take into account ISPM 6:1997 (Guidelines for surveillance) when considering surveillance for PFAs   | The change provides a clearer picture of what is expected from the review (mentionned in point (3)). The inclusion of "monitoring" in (4) is an important component. (5) is now clearer and the supply chain is inclusive.   | English  | EPPO, Netherlands, Russian Federation, Morocco, United Kingdom, Slovenia, Belarus  |    |
| 13.  | *15*  | Editorial  | (4) identify key recommendations for establishing and maintaining PFAs that could be used by contracting parties when implementing this ISPM   | The word "recommendation" should be better defined– it could be an implementation checklist approach or mandatory requirements vs optional ones.   | English  | EPPO, Netherlands, Russian Federation, Morocco, United Kingdom, Slovenia, Belarus  |    |
| 14.  | *15*  | Substantive  | (4) identifyreview key recommendations for establishing and maintaining PFAs that could be used by contracting parties when implementing this ISPM   | Recommendations have already been identified in ISPM 4.   | English  | United States of America  |    |
| 15.  | *15*  | Technical  | (4) identify key recommendations for establishing and maintaining PFAs that could be used by contracting parties when implementing this ISPM    | Provision of guidelines to facilitate implementation of ISPM 4 is required   | English  | Nigeria  |    |
| 16.  | *16*  | Substantive  | (5) Consider implementation of the standard by contracting parties and identify potential Examine any operational and technical implementation issues and . Pprovide information as well as and possible recommendations on these issues to the SC   | Standard already has been implemented since 1995. If there are any operational and technical issues, they need to be stated.   | English  | United States of America  |    |
| 17.  | *17*  | Editorial  | (6) consider whether the revision could affect in a specific way (positively or negatively) the protection of biodiversity and the environment. If this is the case, the impact should be identified, addressed and clarified in the revision. In particular consider how PFAs address environment concerns relating to the use of pesticides for pest control/treatments and the protection of agricultural and forest biodiversity   | Relocate as last Task. Number 9   | English  | Costa Rica  |    |
| 18.  | *18*  | Substantive  | (7) Consider provision for legal obligation to prevent and monitor the movement of commodities in the PFA   | transfered above   | English  | EPPO, Netherlands, Russian Federation, Morocco, United Kingdom, Slovenia, Belarus  |    |
| 19.  | *18*  | Substantive  | (7) Consider provision for legal obligation phytosanitary measures to prevent and monitor the movement of commodities in the PFA   | This is very oddly worded. PFAs require phytosanitary measures (including laws, regulations, requirements etc which by definition are obligations. It should be reworded to be clearer or deleted entirely since the application of measures for PFAs is addressed throughout the standard anyway.   | English  | United States of America  |    |
| 20.  | *19*  | Substantive  | (8) Recommend guidance for management assistance of PFA to include public awareness campaign to all stakeholders in the chain (producers, merchants, shippers)   | transfered above   | English  | EPPO, Netherlands, Russian Federation, Morocco, United Kingdom, Slovenia, Belarus  |    |
| 21.  | *19*  | Substantive  | (8) Recommend guidance for management assistance of PFA to include public awareness campaign to all stakeholders in the chain (producers, merchants, shippers)   | Not a requirement now nor should it be in the future. This is an operational matter and is NOT a matter for harmonization. It does not belong in a standard.   | English  | United States of America  |    |
| 22.  | *20*  | Substantive  | (9) Consider and provide information on the use of buffer zone   | tranfered above   | English  | EPPO, Netherlands, Russian Federation, Morocco, United Kingdom, Slovenia, Belarus  |    |
| 23.  | *20*  | Substantive  | (9) Consider and provide information on the use of buffer zone.Add an article after para. No 20 “Consider and provide information on establishing buffer zone”   | It’s operational.   | English  | China  |    |
| 24.  | *28*  | Substantive  | Five-seven phytosanitary experts that have a combination of expertise in PFAs and related matters and in eestablishing and maintaining PFAs within NPPOs.﻿, development and implementation of phytosanitary measures, pest risk analysis and negotiations involving recognition of PFAs   | The expertise needed is broader than the one neede for the setting up of PFAs - those involved in determining whether PFAs meet their import requirements are also needed.   | English  | EPPO, Netherlands, Russian Federation, Morocco, United Kingdom, Slovenia, Belarus  |    |
| 25.  | *29*  | Editorial  | A representative from the OIE should also be invited to share their expertise in regard to this subject.    | Clarify what is expected of the participation of the OIE   | English  | Costa Rica  |    |
| 26.  | *29*  | Substantive  | A representative from the OIE should also be invited to share their expertise in regard to this subject.   | Pest free zones for animal diseases are managed differently. On the other side OIE recognizes these pest free zones, which is very important at international level. However, under IPPC, according to that provided in ISPM 29, the recognition of pest free areas is a bilateral process between involved NPPOs   | English  | Uruguay, COSAVE, Argentina, Brazil, Paraguay, Peru  |    |