2012-009: Draft Annex to ISPM 28:2007 - Irradiation treatment for *Ostrinia nubilalis*

Comm. no.	Para. no.	Comment type	Comment	Explanation	Country
1.	*G*	Substantive	I support the document as it is and I have no comments		Singapore, Lao People's Democratic Republic, China, Canada, Thailand, Nepal, Barbados, Ghana, Belize
2.	*G*	Technical		The value of ED is described at 99.9918 in this draft. But according to the references mentioned in this draft, the number of pests used in the test is insufficient. It is necessary to add appropriate references in the draft.	Korea, Republic of, NEPPO
3.	*1*	Editorial	**Draft Annex to ISPM 28:2007: Irradiation treatment for *Ostrinia nubilalis*~~IRRADIATION TREATMENT FOR *OSTRINIA NUBILALIS*~~ (2012-009)**	Title not in capitals.	EPPO, European Union, Georgia, Serbia
4.	*1*	Editorial	**Draft Annex to ISPM 28:2007: IRRADIATION TREATMENT FOR *OSTRINIA NUBILALIS* (2012-009)**	Edit - should be lower cased where appropriate.	United States of America, Mexico
5.	*1*	Translation	**Draft Annex to ISPM 28:2007: IRRADIATION TREATMENT FOR *OSTRINIA NUBILALIS* (2012-009)**	"IRRADIATION TREATMENT FOR OSTRINIA NUBILALIS" should be translated into Spanish as "TRATAMIENTO CON IRRADIACIÓN CONTRA OSTRINIA NUBILALIS"	OIRSA
6.	*4*	Editorial	This treatment comprises the irradiation of fruits and vegetables at a minimum absorbed dose of 289 Gy to prevent F_1 development past first instar in eggs through late pupae of *Ostrinia nubilalis* ~~(European corn borer)~~[1].	Edit. The Secretariat should ensure that all treatments not include the common name because common names are varied across regions and across languages. In addition, common names have not been included in adopted standards.	United States of America
7.	*4*	Substantive	This treatment comprises the irradiation of fruits and vegetables at a minimum absorbed dose of 343~~289~~ Gy to prevent F_1 development beyond~~past~~ first instar derived from irradiated~~in eggs through~~ late parent pupae of *Ostrinia nubilalis*	It is recommended the TPPT consider in consultation with the submittting country, a dose of 343Gy to prevent egg hatch. While the	Australia

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			(European corn borer)[1].	proposed dose meets ISPM 18 criteria, the slightly higher dose should not be considered trade restrictive and results in a more readily verified treatment success. This would be more facilitating to trade.	
8.	*4*	Technical	This treatment comprises the irradiation of fruits and vegetables at a minimum absorbed dose of 289 Gy to prevent F_1 development past first instar in eggs through late pupae of *Ostrinia nubilalis* (European corn borer)[1].	Wording of paragraph 4 should be revised because it is not clear. According to Spanish version this treatment comprises the irradiation of fruits and vegetables at a minimum absorbed dose of 289 Gy to attack eggs, larvae and pupae of Ostrinia nubilalis (European corn borer) to prevent F1 development beyond initial stages. If this is revised paragraph 12 should also be clarified	COSAVE, Uruguay, Chile, Brazil, Peru, Argentina
9.	*4*	Translation	This treatment comprises the irradiation of fruits and vegetables at a minimum absorbed dose of 289 Gy to prevent F_1 development past first instar in eggs through late pupae of *Ostrinia nubilalis* (European corn borer)[1].	"This treatment comprises the irradiation of fruits and vegetables at a minimum absorbed dose of 289 Gy to prevent F1 development past first instar in eggs through late pupae of Ostrinia nubilalis (European corn borer)." should be translated into Spanish as "Este tratamiento consiste en la irradiación de frutas y hortalizas con una dosis mínima absorbida de 289 Gy para prevenir el desarrollo de la F1 más allá de los estados de vida iniciales desde el primer estado de huevo hasta el último estado de pupa de Ostrinia nubilalis (barrenador europeo del maíz)."	OIRSA
10.	*6*	Translation	**Name of treatment** Irradiation treatment for *Ostrinia nubilalis*	"Irradiation treatment for Ostrinia nubilalis " should be translated into Spanish as "Tratamiento con irradiación contra Ostrinia nubilalis"	OIRSA
11.	*9*	Editorial	**Target pest** *Ostrinia nubilalis* (Hübner) (Lepidoptera: Crambidae) ~~(European corn borer)~~	Common name already given in paragraph [4].	EPPO, European Union, Georgia, Serbia
12.	*9*	Editorial	**Target pest** *Ostrinia nubilalis* (Hübner) (Lepidoptera: Crambidae) ~~(European corn borer)~~	Edit	United States of America

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13.	*12*	Technical	Minimum absorbed dose of 289 Gy to prevent F_1 development past first instar in eggs through late pupae of *O. nubilalis*.	"Scope of the treatment - This treatment comprises the irradiation of fruits and vegetables at a minimum absorbed dose of 289 Gy to prevent F1 development past first instar in eggs through late pupae of Ostrinia nubilalis (European corn borer)1." However the scientific paper mentions a variation from 233 to 343 Gy. What is the tehchnical justification for this dose?	COSAVE, Uruguay, Chile, Brazil, Peru, Argentina
14.	*13*	Editorial	The efficacy is: effective dose $(ED)_{99.9918}$ at the 95% confidence level.	For better understanding	OIRSA
15.	*13*	Translation	The efficacy is effective dose $(ED)_{99.9918}$ at the 95% confidence level.	"The efficacy is effective dose (ED)99.9918 at the 95% confidence level." should be translated into Spanish as "La eficacia es: dosis efectiva (DE)99.9918 a un nivel de confianza de 95%."	OIRSA
16.	*15*	Editorial	This irradiation treatment should not be applied to fruits and vegetables stored in modified atmospheres because it may affect the treatment efficacy.	For clarification	United States of America
17.	*17*	Substantive	Because irradiation may not result in outright mortality, inspectors may encounter live, but non-viable, *O. nubilalis* (larvae, pupae or adults) during the inspection process. This does not imply a failure of the treatment.	It would be difficult to distinguish contaminant adults from those emerged from treated pupae.	Australia
18.	*18*	Editorial	In evaluating this treatment the Technical Panel on Phytosanitary Treatments (TPPT) considered issues associated with the possibility of the survival of sufficient numbers of sterile adults that would escape from irradiated infested fruits and vegetables ~~produce~~ and fly into exotic pest traps, thereby causing financial loss and trade restrictions. The TPPT considered that, based on the work described in Hallman and Hellmich (2009) and Hallman *et al.* (2010), numbers of fit survivors would be negligible and would not pose quarantine concerns.	More precise and consistent with other adopted irradiation treatments.	EPPO, European Union, Georgia, Serbia
19.	*18*	Substantive	In evaluating this treatment the Technical Panel on Phytosanitary Treatments (TPPT) considered issues associated with the possibility of the survival of sufficient numbers of sterile adults that could~~would~~ escape from irradiated infested produce and fly into exotic pest monitoring traps, thereby triggering a quarantine response possiblycausing financial loss and trade restrictions. The TPPT considered that, based on the work described in Hallman and Hellmich (2009) and Hallman *et al.* (2010), the numbers of	It is not the role of the TPPT to make a judgement as to whether the presence of a live pest of quarantine concern, though sterile, poses an unacceptable level of risk to an importing country. This judgement is a sovereign right of the importing country under the SPS Agreement and IPPC. It is recognised	Australia

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			physically capable~~fit~~ survivors would be sufficiently low to make this an unlikely event.~~negligible and would not pose quarantine concerns~~.	that consistent with the levels of treatment efficacy described in ISPM:18 that sterile adults pose no reproductive risk in the importing country and that based on the TPPT's assessment of the data presented that the incidence of physically capable would be at low levels. However, the assessment as to whether this is an acceptable level of risk to an importing country should be left to that importing country. The TTPT should be commended for recognising the potential for consequences from live adults and for making a clear assessment as to the likelihood of this occurring on a commercial pathway.	
20.	*18*	Technical	In evaluating this treatment the Technical Panel on Phytosanitary Treatments (TPPT) considered issues associated with the possibility of the survival of sufficient numbers of sterile adults that would escape from irradiated infested produce and fly into quarantine~~exotic~~ pest traps, thereby causing economic~~financial~~ loss and trade restrictions. The TPPT considered that, based on the work described in Hallman and Hellmich (2009) and Hallman *et al.* (2010), numbers of fit survivors would be negligible and would not pose quarantine concerns.	Appropriate terms	OIRSA
21.	*18*	Translation	In evaluating this treatment the Technical Panel on Phytosanitary Treatments (TPPT) considered issues associated with the possibility of the survival of sufficient numbers of sterile adults that would escape from irradiated infested produce and fly into exotic pest traps, thereby causing financial loss and trade restrictions. The TPPT considered that, based on the work described in Hallman and Hellmich (2009) and Hallman *et al.* (2010), numbers of fit survivors would be negligible and would not pose quarantine concerns.	"negligible" should be tranlated into Spanish as "insignificante" and "conserns" as "preocupaciones"	OIRSA