

Reconciliation report for 2009-002_Draft_ISPM_RevISPM4_En.docx (2009-002_Draft_ISPM_RevISPM4_En.docx)

Summary

Title	2021 First Consultation: Draft Revision of ISPM 4 (2009-002) (Id 1031)
Description	
End Date	30 9 2021 11:45 午後
Review Status	In Progress (Due: 30 9 2021 11:45 午後; Started: 30 6 2021 3:55 午後)

Participants

Name	Status	Role	Summary	Comments	Last Activity
Japan	In Progress	Reviewer		36	30 9 2021 6:25 午前

T (Type) - B = Bullet, C = Comment, P = Proposed Change, R = Rating

S (Status) - A = Accepted, C = Closed, O = Open, W = Withdrawn, M = Merged

Para	Text	T	Comment	S	Author Comment
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (416) Japan (29 9 2021 12:24 午後) The terms "measures" and "phytosanitary measures" should be distinguished to use depending on the situation, to interpret the requirements of this ISPM correctly. If the measures are for establishing and maintaining a PFA, "measures" should be used, because the measures to control domestic pests (i.e. other than the phytosanitary purposes) may also be applied to establish and maintain the PFA. On the other hand, the term "phytosanitary measure" is used for phytosanitary perspective like a case as "PFA is used as a phytosanitary measure for trade."</p>	O	
Outline of requirements					
38	<p>When initiating, establishing or maintaining a PFA, NPPOs should follow the requirements outlined in this standard. Requirements include systems to establish pest freedom, systems to maintain pest freedom, verification that pest freedom has been attained or maintained, appropriate corrective actions for pest detections, proper documentation of these systems and appropriate record keeping, and transparency and stakeholder communication. The phytosanitary measures used to establish or maintain the PFA should be based on an assessment of pest risk.</p>	P	<p><i>Category : SUBSTANTIVE</i> (418) Japan (29 9 2021 12:27 午後) The terms "measures" and "phytosanitary measures" should be distinguished to use depending on the situation, to interpret the requirements of this ISPM correctly. If the measures are for establishing and maintaining a PFA, "measures" should be used, because the measures to control domestic pests (i.e. other than the phytosanitary purposes) may also be applied to establish and maintain the PFA. On the other hand, the term "phytosanitary measure" is used for phytosanitary perspective like a case as "PFA is used as a phytosanitary measure for trade."</p>	O	

Background				
43	- increasing the market-access opportunities for exporting countries. - protecting areas of plant production or ecological conservation in importing or exporting countries;	P	Category : <i>SUBSTANTIVE</i> (419) Japan (29 9 2021 12:29 午後) The main purpose of PFA as a phytosanitary measure is to increase the market-access opportunities for exporting countries, so put it first. Delete "in importing or exporting countries" because whether importing countries or exporting countries is not relevant in protecting areas of plant production or ecological conservation.	O
44	increasing the market-access opportunities for exporting countries.	P	Category : <i>SUBSTANTIVE</i> (420) Japan (29 9 2021 12:30 午後) See the comment to paragraph43 from Japan.	O
IMPACTS ON BIODIVERSITY AND THE ENVIRONMENT				
48	This standard may contribute to the protection of biodiversity and the environment by preventing the introduction of regulated pests into an area (either a whole an <u>entire</u> country or part of a country). When establishing and maintaining PFAs, countries are encouraged to consider phytosanitary procedures that minimize impact on the environment.	P	Category : <i>EDITORIAL</i> (421) Japan (29 9 2021 12:31 午後) Change "a whole country" to "an entire country" to be consistent with other parts in this standard.	O
Requirements				
50	A PFA should be considered a phytosanitary measure that, when used alone, is sufficient for managing the pest risk associated with a specific pest. Where a PFA has been established in full conformity with this standard, additional phytosanitary measures in relation to the specified pest should not be required <u>required while the phytosanitary security of the consignment should be assured.</u>	P	Category : <i>SUBSTANTIVE</i> (422) Japan (29 9 2021 12:33 午後) Aside from the phytosanitary measures in conformity with this standard, measures to prevent infestation or contamination during transport or storage after harvest may be required in order to assure phytosanitary security. So, suggest to clarify that the phytosanitary security should be assured. ISPM 5 "Phytosanitary security(under consultation) ": State of a consignment when its integrity has been maintained and its infestation and contamination by regulated pests, prevented through the application of phytosanitary measures.	O
58	transparency and stakeholder communication.	P	Category : <i>SUBSTANTIVE</i> (423) Japan (29 9 2021 12:34 午後) Delete "stakeholder". Communication needs to take place not only with stakeholders(domestic industries and local regulatory bodies) but with contracting parties and other NPOs as well.	O
60	the requirement that measures used to establish and maintain a PFA should be based on-on;	P	Category : <i>SUBSTANTIVE</i> (424) Japan (29 9 2021 12:42 午後)	O

	<p>_____ - the biology of the pest of concern<u>concern</u>(<u>survival potential, rate of reproduction, means of dispersal, the availability of host plants etc.</u>),</p> <p>_____ - the relevant pathways and pathways</p> <p>_____ - the characteristics of the PFA<u>PFA</u>(<u>size, degree of isolation, ecological conditions, homogeneity etc.</u>);</p>		Add examples for consideration of each element "the biology of the pest of concern" and "the characteristics of the PFA" because it is better to show readers a concrete examples for better understanding. The examples are referred to from the present ISPM4. In addition to adding the examples in brackets, the three elements in paragraph 60 are divided into three sub-paragraphs.	
1.1 Pest and area to be controlled				
70	<p>When initiating a PFA, an NPPO should first characterize the pest – including the scientific name of the pest, valid identification methods and relevant aspects of its biology – and identify the area that is being considered for pest freedom. The area may be the entire country, a part of a country, or all or part of several countries.</p> <p><u>The boundary of a PFA may not necessarily mean the country's border, depending on the situation of the targeted pest. If a PFA extends beyond a border between two or more countries, establishing and maintaining the PFA should involve the NPPOs concerned.</u></p>	P	<p><i>Category : SUBSTANTIVE</i></p> <p>(425) Japan (29 9 2021 12:44 午後)</p> <p>Add the following complementary explanations on :</p> <ul style="list-style-type: none"> - the relationship between the boundary of PFA and the country border. - the involvements of relevant NPPOs in the case of the PFA across multiple countries 	O
2.1 Surveillance activities before establishment				
78	<p>Once the target pest has been characterized and the area identified, the NPPO should determine the pest status in the area. To do this, the NPPO should conduct <u>area by conducting</u> surveillance in accordance with the requirements outlined in both ISPM 6 (<i>Surveillance</i>) and ISPM 8 (<i>Determination of pest status in an area</i>). These standards describe how surveillance should be conducted and how to establish the evidence necessary to determine the status of a pest in an area.</p>	P	<p><i>Category : EDITORIAL</i></p> <p>(426) Japan (29 9 2021 12:45 午後)</p> <p>editorial change</p>	O
79	<p>In certain cases, such as for the establishment of a pest free country, general surveillance as referred to in ISPM 6 may be sufficient if the NPPO has concluded that the information is reliable and relevant.</p>	P	<p><i>Category : SUBSTANTIVE</i></p> <p>(428) Japan (29 9 2021 12:47 午後)</p> <p>Delete Para 79 as it is redundant and the content is already covered by para 78.</p>	O
80	<p>Where more reliable evidence is needed to demonstrate pest absence in an area, specific surveillance should be established. The level of surveillance should be based on the results of a pest risk assessment, and a delimiting survey conducted to justify the area that is being proposed as a PFA.</p> <p><u>If pest presence is confirmed in the area as the result of surveillance, the NPPO may consider the development of a pest eradication programme according to ISPM 9 (Guidelines for pest eradication programmes).</u></p>	P	<p><i>Category : SUBSTANTIVE</i></p> <p>(430) Japan (29 9 2021 12:53 午後)</p> <p>Para 94 mentions "When...eradication of the pest from the prospective PFA is achieved for the first time (according to ISPM 9 (Guidelines for pest eradication programmes)), the NPPO should make a national declaration that the area is free from the pest". However, there is no description in this ISPM about the action to be taken when the pest presence is confirmed by surveillance for establishment of PFA. So, insert a sentence to provide a guidance for NPPO in considering the development of a pest eradication programme.</p>	O
80	<p>Where more reliable evidence is needed to demonstrate pest absence in an area,</p>	P	<p><i>Category : SUBSTANTIVE</i></p> <p>(429) Japan (29 9 2021 12:50 午後)</p>	O

	specific surveillance should be established. The level of <u>surveillance</u> <u>surveillance</u> (e.g. <u>level of confidence, number of samples, selection and number of sites, frequency of sampling</u>) should be based on the <u>results-assessment</u> of a <u>pest risk-assessment</u> <u>detection survey</u> , and a delimiting survey conducted to justify the area that is being proposed as a PFA.		Add examples to "the level of surveillance" to provide complementary information for ISPM readers on dealing with "the level of surveillance." In the last line of this paragraph, delete "results of a pest risk" and add "of a detection survey", in order to avoid the confusion of interpretations between the meaning of the words in this paragraph and the definition in ISPM5. The meaning of "pest risk assessment" in this paragraph does not apply to the definitions of "pest risk assessment (for quarantine pests)" and "pest risk assessment (for regulated non-quarantine pests)" specified in ISPM5. The level of surveillance may be considered based on the assessment of a pest risk in a general sense but not pest risk assessment defined in ISPM5.	
2.2 Controls on the movement of regulated articles				
91	imposition of domestic restrictions or other measures to control the movement or transit of regulated articles into or through the PFA;	P	<i>Category : SUBSTANTIVE</i> (431) Japan (29 9 2021 12:58 午後) Delete "or transit". The meaning of "the movement of regulated articles into or through the PFA" has already covered "transit". In addition, the content in paragraph 91 is the explanation about the restriction on the domestic movement of regulated articles. The term "transit" defined in ISPM5 is subject to international movement and phytosanitary measures.	O
92	inspection of regulated articles, examination of <u>the relevant documentation documents associated with regulated articles</u> and, where necessary for cases of non-compliance, the application of appropriate phytosanitary measures.	P	<i>Category : SUBSTANTIVE</i> (432) Japan (29 9 2021 12:59 午後) Replace "the relevant documentation" with "documents associated with regulated articles". It's a little unclear what kind of documentation "the relevant documentation" means.	O
2.3 Establishment of buffer zones, if appropriate				
94	Where the geographical isolation of the PFA is not considered adequate to prevent the natural spread of the pest into the area, the implementation of a buffer zone should be considered. The population of the pest in the buffer zone should be maintained at or below a low pest tolerance level, which should be verified by surveillance. The extent of the zone is determined by the NPPO, based on the distance over which the likely natural spread of the pest population to the PFA could not occur during the <u>appropriate season (e.g., the growing season, the season when hosts are present)</u> . The NPPO should describe, with the use of supporting	P	<i>Category : SUBSTANTIVE</i> (433) Japan (29 9 2021 1:01 午後) It is not only the growing season of the host plants that concerns the population of the targeted pest in the buffer zone. Some pests may be mainly involved in the stages of the fruit. Therefore, it is better not to refer to only a specific stage of host plants.	O

	maps, the boundaries of the buffer zone.			
2.4 National declaration of the pest free area				
95	2.4 National declaration of the pest free areafreedom	P	<p><i>Category : EDITORIAL</i> (434) Japan (29 9 2021 1:03 午後) Change section title. The content of Section 2.4 is not the declaration of a PFA but a declaration of pest freedom in the area.</p>	O
96	When the pest status is confirmed as absent (according to ISPM 8), or eradication of the pest from the prospective PFA is achieved for the first time (according to ISPM 9 (<i>Guidelines for pest eradication programmes</i>)), the NPPO should make a national declaration that the area is free from the pest. <u>If the declared area is established as a PFA, the area should meet the requirements in sections 2.2 and 2.3 in addition to declaring pest freedom in the area.</u> All internal management procedures and phytosanitary measures to maintain the PFA (see section 3) should be in place before this declaration is made.	P	<p><i>Category : SUBSTANTIVE</i> (436) Japan (29 9 2021 1:05 午後) Under the present requirements of Section 2.4, just declaring pest freedom in the area could be interpreted as establishing a PFA in the area. Under the actual process of establishing PFA, the area achieved as pest-free status based on Section 2.1 (surveillance) can be recognised as establishing PFA only after the area fulfils the requirements of sections 2.2 (controls on the movement of regulated articles) and 2.3 (establishment of buffer zones, if appropriate).</p> <p>The terms "measures" and "phytosanitary measures" should be distinguished to use depending on the situation, to interpret the requirements of this ISPM correctly. If the measures are for establishing and maintaining a PFA, "measures" should be used, because the measures to control domestic pests (i.e. other than the phytosanitary purposes) may also be applied to establish and maintain the PFA. On the other hand, the term "phytosanitary measure" is used for phytosanitary perspective like a case as "PFA is used as a phytosanitary measure for trade."</p>	O
96	When the pest status is confirmed as absent (according to ISPM 8), or eradication of the pest from the prospective PFA-target area is achieved for the first time (according to ISPM 9 (<i>Guidelines for pest eradication programmes</i>)), the NPPO should make a national declaration that the area is free from the pest. All internal management procedures and phytosanitary measures to maintain the PFA (see section 3) should be in place before this declaration is made.	P	<p><i>Category : EDITORIAL</i> (435) Japan (29 9 2021 1:03 午後) It is unclear what the prospective PFA exactly means. So, modify it to target area.</p>	O
3.1 Legal framework				
99	3.1 Legal framework	C	<p><i>Category : SUBSTANTIVE</i> (437) Japan (29 9 2021 1:06 午後) Although the title is "Legal framework", it is unclear about the relationship between the title and the contents of para 100 - 101</p>	O

			(e.g. movement of regulated articles, early detection, trace-back of regulated articles, notification of pest detections). It may be better to change the title or clarify better the relationship of them.		
100	The pest should be regulated in such a way that it may not be brought into the PFA through movement of regulated articles (see section 2.2). Where appropriate, buffer zones may be established with rules for intensified surveys to ensure early detection of natural spread of the pest into the vicinity of the PFA. The phytosanitary measures should also allow trace-back <u>traceability</u> of regulated articles introduced into the PFA or moving within the PFA, so that the appropriate corrective actions can be taken in a timely manner.	P	<i>Category : EDITORIAL</i> (438) Japan (29 9 2021 1:07 午後) Traceability covers both trace-back and trace-forward, so it seems to be more appropriate to use traceability to cover a wider range of cases.	O	
101	Pest detections in the PFA should be immediately notified to the NPPO (or other competent authority delegated by the NPPO NPPO)(see section 3.4).	P	<i>Category : EDITORIAL</i> (439) Japan (29 9 2021 1:08 午後) To be as the same way as the previous paragraph.	O	
3.2 Surveillance for the maintenance of the PFA					
104	The decision about whether general surveillance for the pest is sufficient or specific surveillance is needed should be based on the results-assessment of a-pest-risk assessments <u>surveillance data and protocols</u> . .	P	<i>Category : EDITORIAL</i> (440) Japan (29 9 2021 1:09 午後) To avoid the confusion of interpretations between the meaning of the words in this paragraph and the definition in ISPM5. The words "pest risk assessment" here may be used as a general sense, but whether general surveillance for the pest is sufficient or specific surveillance is needed is not evaluated based on pest risk assessment defined in ISPM5. It is evaluated based on the assessment of surveillance data and protocols.	O	
3.3 Data collection and record keeping					
107	3.3 Data collection and record keeping	P	<i>Category : SUBSTANTIVE</i> (441) Japan (29 9 2021 1:11 午後) Paragraph 108 of "3.3 Data collection and record keeping" should be moved from Section 3 to Section 5 and change section title of section 5 to "5 Data collection, documentation and record-keeping" The content of data collection and record keeping in section 3.3 is a requirement not only for maintaining a PFA but also for establishing a PFA, so the information is not only for section 3.	O	
108	The data from the surveillance (e.g. time of surveillance, number and type of plants inspected, number of samples taken for inspection, number of samples taken for laboratory analysis, analytical methods used, results of the analysis) should be stored and kept available for a sufficient time to ensure the possibility of trace-back	P	<i>Category : SUBSTANTIVE</i> (442) Japan (29 9 2021 1:11 午後) See the comment to previous paragraph from Japan.	O	

	and verification.			
3.5.3 Implementation of control measures				
121	Measures to eradicate the pest should be implemented. This may include destruction of infested and possibly infested plants and plant products <u>treatment and/or control measures specified in ISPM 9 (Guidelines for pest eradication programmes).</u>	P	<p>Category : SUBSTANTIVE (443) Japan (29 9 2021 1:13 午後)</p> <p>The measures to eradicate the pest are not only destruction of plants and plants products but also a wide range of measures specified in ISPM9 3.2.3 "Treatment and/or control measures"</p>	O
4. Verification and regular review				
126	4. Verification <u>that pest freedom has been attained or maintained</u> and regular review	P	<p>Category : SUBSTANTIVE (444) Japan (29 9 2021 1:14 午後)</p> <p>The content related to "verification that pest freedom has been achieved" in paragraph 55 is not described anywhere in the requirements of this standard, including "Section 4 Verification and regular and review".</p> <p>Therefore, section 4 should describe any information as the common requirements of "verification that pest freedom has been achieved" and "verification that pest freedom has been maintained". The section title should be revised accordingly.</p>	O
127	<u>Normally, pest freedom is attained or maintained based on verification from specific surveillance.</u> Once the PFA is established, a regular review of the performance of the PFA maintenance programme should be carried out. This review should allow the NPPO to find and correct deficiencies, incorporate any new and relevant information on the pest or associated pathways, and adjust and improve the management-maintenance programmes accordingly.	P	<p>Category : SUBSTANTIVE (445) Japan (29 9 2021 1:15 午後)</p> <p>The amendment is related to the change of section title in paragraph 126. Add the content related to "verification that pest freedom has been achieved" in paragraph 55.</p> <p>"The management programs" is the "the PFA maintenance programs" described in the 1st sentence implemented based on the requirements in section 3.</p>	O
5. Documentation and record keeping				
130	5. Documentation <u>Data collection, documentation</u> and record keeping	P	<p>Category : SUBSTANTIVE (446) Japan (29 9 2021 1:20 午後)</p> <p>"Paragraph 108 of "3.3 Data collection and record keeping" should be moved from Section 3 to Section 5 and change section title of section 5 to "5 Data collection, documentation and record-keeping"</p> <p>The content of data collection and record keeping in section 3.3 is a requirement for only maintaining a PFA but establishing a PFA, so the information is not only for section 3.</p>	O
	<u>The data from the surveillance (e.g. time of surveillance, number and type of plants inspected, number of samples taken for inspection, number of samples taken for laboratory analysis, analytical methods used, results of the analysis) to establish and maintain a PFA should be stored and kept available for a sufficient time to ensure the possibility of trace-back and verification.</u>			

131	The phytosanitary measures used for the establishment and maintenance of the PFA should be adequately documented. The documentation should be reviewed and updated regularly, and include any corrective actions taken. National plant protection organizations-NPPO should ensure that records are kept for a minimum of 24 months, or longer depending on the biology of the pest.	P	<p><i>Category : SUBSTANTIVE</i> (447) Japan (29 9 2021 1:21 午後) National plant protection organizations ⇒ NPPOs</p> <p>The terms "measures" and "phytosanitary measures" should be distinguished to use depending on the situation, to interpret the requirements of this ISPM correctly. If the measures are for establishing and maintaining a PFA, "measures" should be used, because, the measures to control domestic pests (i.e. other than the phytosanitary purposes) may also be applied to establish and maintain the PFA. On the other hand, the term "phytosanitary measure" is used for phytosanitary perspective like a case as "PFA is used as a phytosanitary measure for trade."</p>	O
6. Communication and stakeholder engagement				
132	<p>6. Communication and stakeholder engagement</p> <p><u>Individuals, groups or organizations other than the NPPO of the country in which the PFA is situated can also affect, or be affected, by the actions of the NPPO. The NPPO should establish partnerships with stakeholders, which may include seeking contributions of resources.</u></p>	P	<p><i>Category : SUBSTANTIVE</i> (449) Japan (29 9 2021 1:23 午後) Move paragraph 135 to after paragraph 132 as the first paragraph in section 6. Para 135 is about of the common information of PFA regardless of the establishment and maintenance of PFA.</p>	O
132	<p>6. Communication and stakeholder engagement</p>	C	<p><i>Category : SUBSTANTIVE</i> (448) Japan (29 9 2021 1:22 午後) The contents of section 6, "Communication" of paragraphs 132-136, are: - Para 133 is the content when achieving the pest free status of an area and establishing PFA in the area. - Para 134 and 136 are the content when maintaining PFA - Para 135 is the content of the common information of PFA regardless of the establishment and maintenance of PFA.</p> <p>Paragraphs in section 6 need to be moved according to the process of establishing and maintaining PFA. And its texts need to be changed according to the purpose and situation of PFA (see each paragraph for proposed revisions).</p>	O
133	To ensure transparency, information about the establishment of the PFA should be	P	<i>Category : SUBSTANTIVE</i>	O

	communicated to the other NPPOs of importing countries as part of the evidence provided to support the claim that the area is free from the pest. Information about the methodology, results of surveys and pest diagnostics, and other relevant information supporting the claim of pest freedom, should be made available on request to interested stakeholders and other NPPOs.		(450) Japan (29 9 2021 1:25 午後) Para 133 is the content when achieving the pest free status of an area and establishing PFA in the area. Delete "of importing countries" and add "other NPPOs" in the 1st sentence because providing the information of pest free status is not only to NPPOs of importing countries. Delete "interested stakeholders and" and add "other" in the 2nd sentence. The 2nd sentence is about the requirement of providing information from the country in which a PFA is established to other countries. Interested stakeholders can communicate with NPPOs in other countries through an NPPO in their country, so it is unnecessary to communicate with interested stakeholders in different countries directly.	
134	Information about the maintenance of the PFA status should be made available on request to the NPPOs of importing countries. Maps and information about the measures applied to maintain the PFA status should be communicated to producers and stakeholders <u>stakeholders (e.g. producers)</u> . Information about outbreaks <u>of the pest corrective actions, suspension, reinstatement or withdrawal of the PFA</u> should also be communicated to relevant stakeholders and contracting parties <u>other NPPOs. If the PFA is used as a risk management option for plants, plant products and other regulated articles exported from the PFA, information about the maintenance of the PFA status should be made available on request to the NPPOs of importing countries.</u>	P	<i>Category : SUBSTANTIVE</i> (451) Japan (29 9 2021 1:28 午後) - Partially modify the text in the original 1st sentence for export purposes and moved it to the last sentence. This is because the content for maintaining PFA in common, regardless of the purpose of using PFA, should be described at the beginning of this paragraph, and the content for export purposes should be described at the end. - As producers are included in stakeholders, which are modified as an example in the brackets. - Clarify that outbreaks are the outbreaks of the pest targeted in the PFA. - Not only information about outbreak but also information about corrective actions, suspension, reinstatement and withdrawal of the PFA are important to be communicated to other countries - Replace "contracting parties" with "other NPPOs" because "contracting parties" is used only here in this ISPM	O
135	Individuals, groups or organizations other than the NPPO of the country in which the PFA is situated can also affect, or be affected, by the actions of the NPPO. The NPPO should establish partnerships with stakeholders, which may include seeking contributions of resources.	P	<i>Category : SUBSTANTIVE</i> (452) Japan (29 9 2021 1:29 午後) Move paragraph 135 to after paragraph 132 as the first paragraph in section 6. Para 135 is about the common information of PFA regardless of the establishment and maintenance of PFA.	O
136	National plant protection organizations NPPOs are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting sightings of the pest, the phytosanitary measures established <u>established to maintain</u>	P	<i>Category : SUBSTANTIVE</i> (517) Japan (30 9 2021 6:24 午前) Para 136 is the content when maintaining	O

	<p><u>the PFA</u>, and the importance of maintaining the PFA status, to achieve the support of the community.</p>	<p>PFA. Delete "phytosanitary" because measures to maintain PFAs are not always for the purpose of phytosanitary. Add "to maintain the PFAs" after measures established" because it needs to be clarified that the measure is to maintain the PFAs.</p>	
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no comments to show.

Reconciliation report for 2009-002_Draft_ISPM_RevISPM4_Fr.docx (2009-002_Draft_ISPM_RevISPM4_Fr.docx)

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Reconciliation report for 1994-001_Draft_2021_AmendmentsISPM5_En.docx (1994-001_Draft_2021_AmendmentsISPM5_En.docx)

Summary

Title	2021 First Consultation: 2021 Draft Amendments of ISPM 5 (1994-001) (Id 1034)
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Para	Text	T	Comment	S	Author Comment
1.1. "identity (of a consignment)" (2011-001)					
43	The components of a consignment as covered by its phytosanitary certificate and described in the any sections " name of produce and quantity declared ", " botanical name of the phytosanitary certificate. plants " and " place of origin "	P	<p><i>Category : SUBSTANTIVE</i> (121) Japan (29 9 2021 11:28 午前) Identity is being identical to a consignment described in its Phytosanitary Certificate (PC) whether or not the components in its PC are important for pest risk. In this sense, it is not appropriate to limit the components only to "name of produce and quantity declared", "botanical name of plants" and "place of origin".</p> <p>Any other components in its phytosanitary certificate such as "the number of the phytosanitary certificates" "Number and description of packages", "Distinguishing marks", "Name and address of exporter" and "Declared name and address of consignee" may be useful to identify the consignment.</p>	O	
1.2. "general surveillance" (2018-046)					
57	An official process whereby data information on pests in an area are collected from various sources other than surveys , analysed and verified.	P	<p><i>Category : SUBSTANTIVE</i> (122) Japan (29 9 2021 11:31 午前) According to TPG, "data" refers to the raw collected material, which then becomes "information" once it has been analysed and verified. Papers or other evidences which are used for general surveillance have been normally analysed and verified, so the word "information" is appropriate in the context of general surveillance.</p>	O	
1.3. "specific surveillance" (2018-047)					

68	An official process whereby information on pests in an area is obtained through <u>detection survey, delimiting survey an monitoring survey, or any combination thereof</u> surveys .	P <i>Category : SUBSTANTIVE</i> (123) Japan (29 9 2021 11:36 午前) The current draft is not clear about the difference between specific surveillance and survey. The distinct characteristic of specific surveillance is to use 3 types of survey (i.e. detection survey, delimiting survey, monitoring survey). So, clarify in the definition this 3 types of survey for better understanding of specific surveillance.	O
2.4. "germplasm" (2020-005)			
123	Germplasm	P <i>Category : SUBSTANTIVE</i> (124) Japan (29 9 2021 11:38 午前) Suggest deletion of the definition "Germplasm" for the following reasons. 1. Currently, the term "Germplasm" is not commonly used in the area of plant genetic resource such as ITPGRFA. 2. A term "Plant germplasm" has been already defined in the other international code "International code of conduct for plant germplasm collecting and transfer (FAO, 1993)". So, ISPMs do not necessarily need to define germplasm. 3. The existing ISPMs mention "germplasm" only two times i.e. ISPM 5 "Plants" and ISPM 38 1.3.2 (see below). In both cases germplasm is mentioned as an example of plants with seeds. However, many of plant germplasms are actually traded by the form of seeds, which means they are covered by the term "seeds". So, it is not necessarily to specifically mention germplasm as an example of plants aside from seeds. ISPM 5 (Glossary of phytosanitary terms) Plants: Living plants and parts thereof, including seeds and germplasm ISPM38 (International movement of seeds) 1.3.2 Seeds for planting under restricted conditions: Examples include seeds for evaluation, germplasm and seeds as breeding material. 4. In addition, the purpose of "plants for planting" according to ISPM 5 is "intended to remain planted, to be planted or replanted" while the purpose of "germplasm" according to the definition is "intended for use in breeding or conservation programmes". So, the draft revision may cause a contradiction in any case.	O

124	<u>Plants for planting</u> intended for use in breeding or conservation programmes	P	Category : <i>SUBSTANTIVE</i> (125) Japan (29 9 2021 11:39 午前) See the previous comment from Japan	O
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Reconciliation report for 1994-001_Draft_2021_AmendmentsISPM5_Es.docx (1994-001_Draft_2021_AmendmentsISPM5_Es.docx)

Summary

Title	2021 First Consultation: 2021 Draft Amendments of ISPM 5 (1994-001) (Id 1034)
Description	
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Participants

Name	Status	Role	Summary	Comments	Last Activity
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T (Type) - B = Bullet, C = Comment, P = Proposed Change, R = Rating

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no comments to show.

Reconciliation report for 1994-001_Draft_2021_AmendmentsISPM5_Fr.docx (1994-001_Draft_2021_AmendmentsISPM5_Fr.docx)

Summary

Title	2021 First Consultation: 2021 Draft Amendments of ISPM 5 (1994-001) (Id 1034)
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Reconciliation report for 2014-007_Draft_Rev_ISPM_18_Irrad_En_2021-05-26.docx (2014-007_Draft_Rev_ISPM_18_Irrad_En_2021-05-26.docx)

Summary

Title	2021 First Consultation: Draft ISPM: Revision of ISPM 18 (2014-007) (Id 1030)
Description	
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Review Status	In Progress (Due: 30 9 2021 11:45 午後; Started: 30 6 2021 1:59 午後)

Participants

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S (Status) - A = Accepted, C = Closed, O = Open, W = Withdrawn, M = Merged

Para	Text	T	Comment	S	Author Comment
2. Irradiation application					
76	Treated commodities should be certified and released only after dosimetry measurements confirm that D_{min} was equal to, or above, the required phytosanitary treatment dose and therefore that the dose requirement has been met throughout the process load. Where a pest species requiring a higher dose is found upon inspection and that dose requirement has not been met, If consignments may be are re-treated, provided the maximum absorbed dose (D_{max}) total from all treatments is should be within the limits allowed by the importing country.	P	<i>Category : SUBSTANTIVE</i> (239) Japan (29 9 2021 11:44 午前) When carrying out the treatment, it is necessary to clarify the pests and pest groups to be treated and to carry out the treatment with the required dose. Therefore, there is a doubt as to whether only the re-treatment is appropriate as a measure in case where a pest known to require a higher dose than the target pest is found by the inspection. In addition, since the content of this paragraph is a requirement for implementing retreatment, it is not necessary to limit it to a specific reason for retreatment.	O	
7. Inspection					
153	Live target pests may be found after treatment, but this should not result in the refusal to issue a phytosanitary certificate. Where mortality is the required response, live target-pests may be found during the period immediately following the irradiation; in such cases, phytosanitary certification should be based on confirmation from audit checks that mortality is attained for the specific commodity and treatment conditions concerned. Where mortality is not the required response, it is more likely that live target pests may persist in the treated consignment; in such cases, phytosanitary certification should be based on confirmation from the normal validation programme that the required response is achieved for the specific commodity and treatment conditions concerned.	C	<i>Category : SUBSTANTIVE</i> (240) Japan (29 9 2021 11:45 午前) The IR treatment schedules of annexes to ISPM28 do not require "mortality", but are there any specific treatment schedules that require "mortality" in IR treatment? If there are not such IR treatments, the description in the case of "Where mortality is the required response, live target-pests may be found" seems to be unnecessary. If there are such IR treatment schedules, it is necessary to include a concrete explanation of what kind of "audit checks" are needed as a response to when a living pest is found.	O	

Reconciliation report for 2014-007_Draft_Rev_ISPM_18_Irrad_Es_2021-05-26.docx (2014-007_Draft_Rev_ISPM_18_Irrad_Es_2021-05-26.docx)

Summary

Title	2021 First Consultation: Draft ISPM: Revision of ISPM 18 (2014-007) (Id 1030)
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Reconciliation report for 2014-007_Draft_Rev_ISPM_18_Irrad_Fr_2021-05-26.docx (2014-007_Draft_Rev_ISPM_18_Irrad_Fr_2021-05-26.docx)

Summary

Title	2021 First Consultation: Draft ISPM: Revision of ISPM 18 (2014-007) (Id 1030)
Description	
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Reconciliation report for 2008-006_Draft_Annex2_ISPM20_import_authorisation_En.docx (2008-006_Draft_Annex2_ISPM20_import_authorisation_En.docx)

Summary

Title	2021 First Consultation: Draft Annex to ISPM 20: Use of Specific Import Authorizations (2008-006) (Id 1038)
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Participants

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Para	Text	T	Comment	S	Author Comment
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p>(218) Japan (30 9 2021 6:38 午前)</p> <p>It is necessary to clarify the range of application of specific import authorizations (SIAs) for phytosanitary purposes. Specific import authorizations (SIAs) are used in a wide range of purposes under phytosanitary activities, and moreover there are facts that each country is used in various forms. If the range of application of SIAs is not clarified, the ISPM results in guaranteeing "import restrictions". It is necessary to further research and organize the cases of each country and carefully consider them, including revision of the contents of Section 4.2.2 "Import authorization" of ISPM20. SIAs are "official consent for the import of specific regulated articles", and their forms include "license" and "permit". The examples of SIAs for phytosanitary purposes are as below:</p> <p>(a) When plants for which phytosanitary requirements have not been determined or the imports are prohibited are imported for the purpose of "cases" (*1) described in Section 4.2.2 of ISPM20.</p> <p>(b) If phytosanitary requirements have been</p>	O	

			<p>established, regulated articles are usually imported under "4.2.1 Phytosanitary measures for consignments to be imported". However, for the purpose of "cases" (*1) described in Section 4.2.2 of ISPM20, when the regulated articles are imported as SIAs without going through the general process.</p> <p>(c) When a SIA is used for the purpose of "specifying phytosanitary import requirements" for the regulated articles for which phytosanitary requirements have been determined.</p> <p>However, especially in the case of (c), the purpose of SIAs is ambiguous, and it may become an "import restriction" depending on the situation.</p> <p>Excerpt from Section 4.2.2 Import authorization of ISPM20 *1 Cases where this type of authorization may be required include:</p> <ul style="list-style-type: none"> - emergency or exceptional imports - imports with specific, individual phytosanitary import requirements such as those with post-entry quarantine requirements or designated end use or research purposes <p>imports where the NPPO requires the ability to trace the material over a period of time after entry.</p>	
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (217) Japan (30 9 2021 6:35 午前)</p> <p>Regarding "5. General import authorizations", it should specify what kind of cases are applicable to "General import authorization (GIA)". In particular, it is not clear about the differences between GIA and "4.2.1 Phytosanitary measures for consignments to be imported" of ISPM20.</p>	O
ANNEX 2: Use of specific import authorizations				
25	<p>Specific <u>For some specific regulated articles, phytosanitary import requirements have not been established or their imports are prohibited. In those cases, specific import authorizations (SIAs) as referred to in this standard (section 4.2.2) may provide official consent for the import of these specific regulated articles for the purpose of the cases of SIAs in Section 4.2.2 of this standard</u> and specify phytosanitary import requirements for those articles. Specific import authorizations</p>	P	<p><i>Category : SUBSTANTIVE</i> (226) Japan (30 9 2021 7:07 午前)</p> <p>As pointed out in the general comment from Japan, proposed revision of the texts should clarify the range of application of Specific import authorizations (SIAs) for phytosanitary purposes.</p> <p>In particular, since the content of the second</p>	O

	<p>may be used when official consent for import is necessary, or when to specify phytosanitary import requirements have not been established requirements, or when import would otherwise be prohibited. Specific import but the authorizations do not replace the obligation of the national plant protection organization (NPPO) of the importing country to communicate the phytosanitary import requirements to the NPPO of the exporting country.</p>		
25	<p>Specific- For some specific regulated articles, phytosanitary import requirements have not been established or their imports are prohibited. In those cases, specific import authorizations (SIAs) as referred to in this standard (section 4.2.2)-may provide official consent for the import of these specific regulated articles for the purpose of the cases of SIAs in Section 4.2.2 of this standard and specify phytosanitary import requirements for those articles. Specific import authorizations may be used when official consent for import is necessary, or when to specify phytosanitary import requirements have not been established requirements, or when import would otherwise be prohibited. Specific import but the authorizations do not replace the obligation of the national plant protection organization (NPPO) of the importing country to communicate the phytosanitary import requirements to the NPPO of the exporting country.</p>	<p>P <i>Category : SUBSTANTIVE</i> (225) Japan (30 9 2021 7:07 午前) As pointed out in the general comment from Japan, proposed revision of the texts should clarify the range of application of Specific import authorizations (SIAs) for phytosanitary purposes. In particular, since the content of the second sentence is unclear, a part of 2nd sentence is moved to a new 1st sentence to clarify that the purpose of SIAs is to import the specific articles for which "phytosanitary import requirements have not been established" and "the imports are prohibited". In new 2nd sentence, it is to clarify that SIAs "provide official consent for the import" and SIAs are used for "the purpose of the cases described in Section 4.2.2 of this standard." In the last sentence, add information because it is not clear why SIAs do not replace the obligation of the NPPO of the importing country.</p>	O
2.3 Additional information that may be included			
46	<p>whether the authorization is for a single individual or multiple series of consignments;</p>	<p>P <i>Category : EDITORIAL</i> (183) Japan (29 9 2021 11:56 午前) Propose change to be aligned with para 26 "They may be issued for individual consignments or a series of consignments." in order to avoid confusion.</p>	O
2.4 Language			

52	The NPPOs of importing countries may choose the language or languages in which their SIAs are issued but are encouraged to also use one of the languages of the Food and Agriculture Organization of the United Nations Nations <u>Nations , preferably in English.</u>	P <i>Category : SUBSTANTIVE</i> (184) Japan (29 9 2021 11:57 午前) 2.2 Minimum information requirements in this Annex includes "phytosanitary import requirements" as an information which should be described in SIAs. On the other hand, ISPM 7 section 5.2 says "NPPOs are encouraged to provide their official phytosanitary import requirements to RPPOs or on the IPP in one of the official languages of FAO, preferably in English". In light of the above, It is also appropriate to encourage countries to use English for SIAs if possible, in order to communicate accurate and clear information to exporting countries.	O
3. Possible uses of specific import authorizations			
54	The following examples of purposes, articles and situations related to import indicate where use of SIAs may be appropriate:	C <i>Category : SUBSTANTIVE</i> (186) Japan (29 9 2021 12:00 午後) There are many items listed, but main situations where SIAs may be used should be only 3 cases i.e. para 59, 62 and 63. Other items can be included as one of the examples in the 3 items. While the 3 cases are conceptual ones, other items are concrete purposes or articles, so it can be listed in a different way. Add evidence for criminal investigation as one of the concrete examples.	O
55	research and scientific purposes;	P <i>Category : SUBSTANTIVE</i> (187) Japan (29 9 2021 12:02 午後) See the comment to paragraph54 from Japan.	O
56	exhibition purposes;	P <i>Category : SUBSTANTIVE</i> (188) Japan (29 9 2021 12:02 午後) See the comment to paragraph54 from Japan.	O
57	educational purposes;	P <i>Category : SUBSTANTIVE</i> (189) Japan (29 9 2021 12:02 午後) See the comment to paragraph54 from Japan.	O
58	religious or cultural purposes (e.g. religious festivals, ancestral customs);	P <i>Category : SUBSTANTIVE</i> (190) Japan (29 9 2021 12:02 午後) See the comment to paragraph54 from Japan.	O
59	articles for which the NPPO of the importing country requires the ability to trace	P <i>Category : SUBSTANTIVE</i>	O

	and manage over a period of time after entry (e.g. articles subject to post-entry quarantine or processing processing, research and scientific purposes, exhibition purposes, educational purposes, religious festivals, ancestral customs, biological control agents and other beneficial organisms);		(191) Japan (29 9 2021 12:03 午後) See the comment to paragraph54 from Japan.		
60	emergency situations;	P	<i>Category : SUBSTANTIVE</i> (192) Japan (29 9 2021 12:04 午後) See the comment to paragraph54 from Japan.	O	
61	biological control agents and other beneficial organisms;	P	<i>Category : SUBSTANTIVE</i> (193) Japan (29 9 2021 12:04 午後) See the comment to paragraph54 from Japan.	O	
62	situations where general import authorizations have not been developed;(e.g. emergency situations, evidence for criminal investigation);	P	<i>Category : SUBSTANTIVE</i> (194) Japan (29 9 2021 12:05 午後) See the comment to paragraph54 from Japan.	O	
4.1 The NPPO of the importing country					
74	defining the language used in SIAs; <u>- [New] providing importers with a translation of phytosanitary import requirements on the SIA, when necessary to supply exporting countries with clear and accurate information</u>	P	<i>Category : SUBSTANTIVE</i> (185) Japan (29 9 2021 12:00 午後) In this Annex, the responsibility of translation rests with importers or exporters, but it is sometimes difficult for them to translate precisely phytosanitary import requirements of SIAs especially for technical phytosanitary words. On the other hands, ISPM 7 section 5.2 states "In order to supply the NPPO of the exporting country with phytosanitary import requirements, clear and accurate information should be provided by the importing country". It is therefore appropriate to add, as a responsibility of the NPPO of the importing country, a translation of phytosanitary import requirements on the SIA in order to supply exporting countries with clear and accurate information. ISPM7 Phytosanitary certification system "5.2 Communication between NPPOs" In order to supply the NPPO of the exporting country with phytosanitary import requirements, clear and accurate information should be provided by the importing country, preferably by its IPPC contact point in accordance with IPPC Article VII.2(b) and also in response to a request	O	

		by the NPPO of the exporting country.	
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Reconciliation report for 2008-006_Draft_Annex2_ISPM20_import_authorisation_Es.docx (2008-006_Draft_Annex2_ISPM20_import_authorisation_Es.docx)

Summary

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Reconciliation report for 2008-006_Draft_Annex2_ISPM20_import_authorisation_Fr.docx (2008-006_Draft_Annex2_ISPM20_import_authorisation_Fr.docx)

Summary

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Reconciliation report for 2004-010_CaLiberibacterCitrus_En_2021-05-27.docx (2004-010_CaLiberibacterCitrus_En_2021-05-27.docx)

Summary

Title	2021 First Consultation: Draft DP for Candidatus Liberibacter spp. on Citrus spp. (2004-010) (Id 1033)
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Para	Text	T	Comment	S	Author Comment
3.4.3	Conventional PCR				
97	3.4.3 Conventional PCR	C	<p><i>Category : TECHNICAL</i> (300) Japan (29 9 2021 12:08 午後) In this section, two conventional PCR method to detect <i>Ca. L. asiaticus</i> and <i>Ca. L. africanus</i> are introduced as "3.4.3.1 Jagoueix et al. (1996)" and "3.4.3.2 Hocquellet et al. (1999)".</p> <p>There is, however, more sensitive method to detect <i>Ca. L. asiaticus</i> published by Fujikawa et al. (2012) *. It is considered that this method is more useful in the Asian region and the American continent where only <i>Ca. L. asiaticus</i> is present among <i>Ca</i> species. So, we propose to add the method of Fujikawa et al. (2012) in this section.</p> <p>* Fujikawa T, Iwanami T. Sensitive and robust detection of citrus greening (huanglongbing) bacterium "Candidatus <i>Liberibacter asiaticus</i>" by DNA amplification with new 16S rDNA specific primers. <i>Molecular and Cellular Probes</i> 26 (2012) 194-197</p>	O	
105	Although Jagoueix <i>et al.</i> (1996) determined that the primer pair OI1/OI2c detects ' <i>Ca. L. asiaticus</i> ' and ' <i>Ca. L. africanus</i> ', this primer pair does not detect ' <i>Ca. L. americanus</i> ' (Li, Hartung and Levy, 2007). No amplification was obtained when this primer pair was tested on <i>Acinetobacter lwoffii</i>, <i>Agrobacterium tumefaciens</i>, <i>Citrus tristeza virus</i>, <i>Escherichia coli</i>, <i>Candidatus Phytoplasma</i>	P	<p><i>Category : SUBSTANTIVE</i> (301) Japan (29 9 2021 12:09 午後) If the method is specific for detecting the target species of this protocol, there is no need to describe that other certain species are not detected. It is better to simplify the description to avoid unnecessary</p>	O	

	aurantifolia' (lime witches broom phytoplasma), 'Candidatus Phytoplasma solani' (stolbur phytoplasma), Spiroplasma citri, Xanthomonas campestris, and Xylella fastidiosa. The sensitivity of the method was not quantified, but although amplifications were obtained from 20 mg of infected midribs they were not obtained when lesser amounts of infected midribs were mixed with 1 g of healthy midrib tissue.		misunderstanding (e.g. other species than the written species here can be detected?).	
147	Hocquellet <i>et al.</i> (1999) designed the primers A2 and J5 specifically to detect 'Ca. L. asiaticus' and 'Ca. L. africanus'. No amplifications were obtained when this method was used on A. tumefaciens, A. lwoffii, E. coli, Xanthomonas axonopodis pv. citri, X. fastidiosa S. citri, 'Candidatus Phytoplasma aurantifolia', and 'Candidatus Phytoplasma solani' (stolbur phytoplasma). These primers do not detect 'Ca. L. americanus' (Li, Hartung and Levy, 2007).	P	Category : SUBSTANTIVE (303) Japan (29 9 2021 12:12 午後) If the method is specific for detecting the target species of this protocol, there is no need to describe that other certain species are not detected. It is better to simplify the description to avoid unnecessary misunderstanding (e.g. other species than the written species here can be detected?)	○
197	The primer pair GB1/GB3 detects only 'Ca. L. americanus' and not 'Ca. L. asiaticus' or 'Ca. L. africanus'. No amplification was obtained when the method was used on Phytophthora citricola and Phytophthora citrophthora, X. axonopodis pv. citri strain A, X. fastidiosa, (Li, Hartung and Levy, 2007).	P	Category : SUBSTANTIVE (302) Japan (29 9 2021 12:10 午後) If the method is specific for detecting the target species of this protocol, there is no need to describe that other certain species are not detected. It is better to simplify the description to avoid unnecessary misunderstanding (e.g. other species than the written species here can be detected?) Li, Hartung and levy, 2007 includes only the data that L. americanus is detected, but does not include the data that other two species are not detected. So, it is not appropriate to put the paper as a sole reference. Delete it or replace it with "Teixeira et al. 2005a".	○
3.4.4 Real-time PCR				
243	Li <i>et al.</i> (2006) determined that the primer–probe set HLBaspr (HLBas/HLBp/HLBr) detects 'Ca. L. asiaticus' and the primer–probe set HLBafpr (HLBaf/HLBp/HLBr) detects 'Ca. L. africanus'. The primer–probe set HLBaspr can detect 'Ca. L. africanus' and HLBafpr can detect 'Ca. L. asiaticus', but with higher Ct values. The primer–probe set HLBampr (HLBam/HLBp/HLBr) detects 'Ca. L. americanus' but not 'Ca. L. africanus' or 'Ca. L. asiaticus'. No amplification was obtained when the method was used on Citrus tristeza virus and Curtobacterium flaccumfaciens strain ER1/6, P. citricola I 22F3, P. citrophthora I 1E4, X. fastidiosa, X. axonopodis pv. citri strain A, (Li et al., 2006).	P	Category : SUBSTANTIVE (304) Japan (29 9 2021 12:16 午後) If the method is specific for detecting the target species of this protocol, there is no need to describe that other certain species are not detected. It is better to simplify the description to avoid unnecessary misunderstanding (e.g. other species than the written species here can be detected?)	○
396	Lin <i>et al.</i> (2010) evaluated the specificity (analytical specificity) of the method with over 70 strains of 'Ca. L. asiaticus' from six different countries and against several non-target pathogens of citrus including 'Ca. L. afrieanus , africanus ' and 'Ca. L. americanus and americanus Ca. L. solanacearum', Only 'S. citri, Xanthomonas citri subsp. citri, X. fastidiosa. Only 'Ca. L. asiaticus' was detected.	P	Category : SUBSTANTIVE (305) Japan (29 9 2021 12:19 午後) If the method is specific for detecting the target species of this protocol, there is no need to describe that other certain species are not detected. It is better to simplify the description to avoid unnecessary	○

	The sensitivity was estimated as 10^3 copies of target DNA. No other performance data are available.	misunderstanding (e.g. other species than the written species here can be detected?).	
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Reconciliation report for 2015-014_Draft_ISPM_Audit_2021-06-29.docx (2015-014_Draft_ISPM_Audit_2021-06-29.docx)

Summary

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Participants

Name	Status	Role	Summary	Comments	Last Activity
Japan	In Progress	Reviewer		2	29 9 2021 8:24 午前

T (Type) - B = Bullet, C = Comment, P = Proposed Change, R = Rating

S (Status) - A = Accepted, C = Closed, O = Open, W = Withdrawn, M = Merged

Para	Text	T	Comment	S	Author Comment
Scope					
32	This standard covers audits in the phytosanitary context conducted by a national plant protection organization (NPPO) in its own territory, or with and in the territory of another NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on its behalf. This standard focuses only on the phytosanitary aspects of audits. For general aspects of audits, other sources of information are available.	P	<i>Category : SUBSTANTIVE</i> (269) Japan (29 9 2021 8:21 午前) The second last sentence is redundant and unnecessary as it is already said in the first sentence "This standard covers audits in the phytosanitary context". For the last sentence, it is not clear what "other sources of information are available" means and it is also unnecessary.	O	
Outline of requirements					
39	This standard describes the purpose and procedures for audit activities in the phytosanitary context. This includes the circumstances that may initiate an audit , the criteria-roles and responsibilities of the auditor and auditee and the procedures for planning, preparing for, undertaking and reporting the outcome of an audit. The audit elements to be considered depend on the type of audit and its purpose, scope and objectives.	P	<i>Category : SUBSTANTIVE</i> (270) Japan (29 9 2021 8:23 午前) Delete "criteria" as the requirements of this standard don't offer "criteria". Instead, replace it with "roles and responsibilities of the auditor and auditee" as it is one of the main requirements in this standard.	O	

Reconciliation report for 2019-008_DraftISPM_CommodityStandard_En_2021-06-10.docx (2019-008_DraftISPM_CommodityStandard_En_2021-06-10.docx)

Summary

Title	2021 Second Consultation: Commodity-based standards for phytosanitary measures (2019-008) (Id 1048)
Description	
End Date	30 9 2021 11:45 午後
Review Status	In Progress (Due: 30 9 2021 11:45 午後; Started: 30 6 2021 5:01 午後)

Participants

Name	Status	Role	Summary	Comments	Last Activity
Japan	In Progress	Reviewer		5	29 9 2021 9:05 午前

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Para	Text	T	Comment	S	Author Comment
44	Contracting parties should consider available commodity standards when developing phytosanitary import requirements. Each commodity standard is specific to a particular commodity and intended use, and contains a list of pests and corresponding options for phytosanitary measures to manage them. The list of pests includes pests that may infest the commodity being traded and that may pose a risk to the importing country when the commodity is used for the intended use specified in the commodity standard. The options for phytosanitary measures listed are those that satisfy minimum criteria for inclusion in the standard, ¹ and are categorized according to confidence in the measures . The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.	P	<i>Category : SUBSTANTIVE</i> (255) Japan (29 9 2021 8:34 午前) The definition of confidence is quite unclear, so it is difficult to categorize the measures based on confidence. Please see the comments for section 4 in details.	O	
3. Criteria for inclusion of measures in commodity standards					
115	The practicality, feasibility and cost of potential measures should also be considered by contracting parties when implementing a commodity standard and evaluating the suitability of the measures contained within it.	C	<i>Category : SUBSTANTIVE</i> (254) Japan (29 9 2021 8:31 午前) There seems to be a duplication between the second half of para 114 and para 115. One of them is not necessary or they can be integrated to one sentence.	O	
4. Confidence in measures					
116	4. Confidence in <u>Categorization of</u> measures	P	<i>Category : SUBSTANTIVE</i> (257) Japan (29 9 2021 8:39 午前) 1 The definition of confidence is quite unclear, so it is difficult to categorize the measures based on confidence. It is not clear about what "Confidence"	O	

			<p>exactly means (e.g. in terms of intensity, effectiveness, practicability, feasibility or efficiency?). Unless confidence is defined, it is difficult to categorize measures based on confidence in an objective manner. However, measures may be categorized based on fact-based information (such as the presence of the measure in an adopted ISPM or a regional standard, the history of the use of the measure by contracting parties). Such categorization is still useful for contracting parties to consider use of measures included in commodity standards. 2 Criteria should be an ISPM if developed. Even if criteria for categorization of measures can be developed, it should be set up within ISPM which requires countries consultation because the criteria of categorization is one of the core elements of this international standard. The existing ISPMs do not have similar descriptions in which TPs can develop any criteria. Such a non-transparent precedent should be avoided for ISPMs. If the technical panel concludes, as the result of its discussion, that the criteria should be developed, the TP can suggest a revision of this ISPM with proposed criteria. 3. For the reason above, suggest modification of the draft text.</p>		
117	<p>Options for phytosanitary measures are <u>may be</u> categorized <u>according to confidence in the measures. Confidence in the measures is evaluated based on criteria developed and revised as necessary</u> by the Technical Panel on Commodity Standards. Evaluation of confidence may be <u>Standard based</u> or <u>non fact-based information available such as:</u></p>	P	<p><i>Category : SUBSTANTIVE</i> (258) Japan (29 9 2021 9:04 午前) See the coment to paragaraph116 from Japan</p>	O	
129	<p>Confidence depends on the rigour of any supporting analyses and may be increased if there are cumulative sources of evidence, such as information on usage or acceptance.</p>	P	<p><i>Category : SUBSTANTIVE</i> (256) Japan (29 9 2021 8:36 午前) See the coment to paragraph116 from Japan</p>	O	

Reconciliation report for 2015-011_Draft_ISPM_12_PCs_reexport_2021-06-07.docx (2015-011_Draft_ISPM_12_PCs_reexport_2021-06-07.docx)

Summary

Title	2021 Second Consultation: Focused Revision of ISPM 12 ("re-export") (2015-011) (Id 1043)
Description	
End Date	30 9 2021 11:45 午後
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Participants

Name	Status	Role	Summary	Comments	Last Activity
Japan	In Progress	Reviewer		5	30 9 2021 4:53 午前

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Para	Text	T	Comment	S	Author Comment
1.3 Attachments to phytosanitary certificates					
72	If the information required to complete phytosanitary certificates exceeds the available space on the form, an attachment may be added. The information in the attachment should only include what is required on the phytosanitary certificates. All pages of attachments should bear the number of the phytosanitary certificates and should be dated, signed and stamped in the same manner as required for the phytosanitary certificates. Phytosanitary certificates should refer to any attachments in the appropriate section. If an attachment has more than one page, the pages should be numbered and the number of pages indicated on the phytosanitary certificates. Other documents such as the Convention on International Trade in Endangered Species (CITES) certificates may accompany the consignment along with the phytosanitary certificate, but such documents should not be considered attachments to the phytosanitary certificates nor should they be referenced on the phytosanitary certificate.	C	<i>Category : SUBSTANTIVE</i> (119) Japan (29 9 2021 9:28 午前) It might seem that there is a contradiction between para 72 and para 258 about attachment of documents to PC. It should be clarified whether "other documents" in para 72 do not include "documents such as the original certificate" of para 258 in order to avoid misunderstanding between contracting parties. Please also see comments in para 258.	O	
5. Guidelines and Requirements for Completing Sections of a Phytosanitary Certificate for Export					
166	The place of origin refers to places where the commodity was grown or produced, and where it may therefore have been infested or contaminated was possibly exposed to infestation or contamination by regulated pests. In all cases, the name of the country or countries of origin should be stated stated by referring to the definition of the country of origin of each commodity type (i.e., plant, plant product, or other regulated article) in ISPM5. Normally a consignment gains its phytosanitary status from the place of origin. Countries may also require that the name or code of the pest free area, pest free place of production or pest free production site be identified. Further details on the pest free area, pest free place of production or pest free production site may be provided in the additional declaration section.	P	<i>Category : SUBSTANTIVE</i> (120) Japan (29 9 2021 9:33 午前) Suggest the addition to refer to the definition of the country of origin in ISPM 5 to avoid misinterpretation of "where the commodity was grown or produced" described in paragraph 166 of ISPM 12. The requirements of ISPM12 describes the "place of origin" of the PC, while ISPM5 defines the "country of origin". "Place of origin" covers a wide range of situations, so it may be difficult to declare it when issuing a PC if there are no additional explanations and examples.	O	

		<p>The definition of "country of origin" is defined in ISPM5 as follows.</p> <ul style="list-style-type: none"> - country of origin (of a consignment of plant products) : Country where the plants from which the plant products are derived were grown - country of origin (of a consignment of plants) : Country where the plants were grown - country of origin (of regulated articles other than plants and plant products) : Country where the regulated articles were first exposed to contamination by pests. <p>Since "commodity" described in paragraph 166 of this ISPM12 includes "plant, plant product, or other regulated article", using "produced" here may be appropriate. However, in the definition of ISPM5, "country of origin" is a country where "plants" or "plant products" is "grown". Therefore, the word "produced" described in this paragraph of ISPM12 may cause an interpretation different from the definition of ISPM5.</p> <p>For example, as the similar case of "Some wood chips are produced" described in ISPM39, when Country -B imports woods grown in Country -A, Country -B produces wood chips from the woods and exports them to other countries, it is necessary to describe " Country -B (Country -A)" in the "place of origin" of the phytosanitary certificate according to the example "name of country of export (name of country of origin) " in the ISPM12.</p> <p>However, if Country-B interprets this part of ISPM12 mistakenly as "a country that wood chips are produced is country of origin", it is likely to describe only Country-B in the phytosanitary certificate.</p>	
6.1 Considerations for issuing a phytosanitary certificate for re-export			
229	<p>When a consignment is imported into a country, and then re-exported to another, the NPPO of the country of re-export, upon request by exporters, shouldmay issue a phytosanitary certificate for re-export³ (see model in Annex 2) <u>(see model in Annex 2) only if all of the following requirements are met:</u> <u>- [New]The NPPO is confident that the phytosanitary import requirements of the country of destination are met.</u></p>	<p>P <i>Category : SUBSTANTIVE</i> (121) Japan (29 9 2021 9:38 午前) Para 235 "the NPPO is confident that the phytosanitary import requirements of the country of destination are met" is described as if it is an additional requirement for issuance of a phytosanitary certificate for re-export with "in addition to". However, this is one of the most fundamental conditions for issuance of a phytosanitary certificate for re-</p>	O

			export, so place it up in parallel with the other bullet points. In this case, as a requirement for issuance of phytosanitary certificate for re-export, it is necessary to modify "may issue" to "should issue".		
235	The In addition to the above requirements, the NPPPO should issue a phytosanitary certificate for re-export only if it is confident that the phytosanitary import requirements of the country of destination are met.	P	Category : SUBSTANTIVE (122) Japan (29 9 2021 9:39 午前) See the comment to paragraph229 from Japan	O	
6.2 Considerations for issuing a phytosanitary certificate for export in certain re-export cases					
258	<u>Documents such as the original phytosanitary certificate or a certified copy may be attached to the phytosanitary certificate for export if they contain information that was used to complete the phytosanitary certificate for export. In this case, the relevant additional declarations on the original phytosanitary certificate or the certified copy, and the number of that certificate, may be referred to in the additional declaration section of the phytosanitary certificate for export to attest compliance with the phytosanitary import requirements of the country of destination (e.g. growing season inspection, soil testing) that cannot be met by the country of re-export.</u>	C	Category : SUBSTANTIVE (130) Japan (30 9 2021 4:53 午前) Para 72 states "Other documents such as CITES certificates should not be considered attachments to the phytosanitary certificates nor should they be referenced on the phytosanitary certificate". On the other hand, Para 258 states "Documents such as the original phytosanitary certificate or a certified copy may be attached to the phytosanitary certificate for export, and the relevant additional declarations on the original phytosanitary certificate or the certified copy may be referred to in the additional declaration section of the phytosanitary certificate for export". It might seem that there is a contradiction between those two sentences about attachment of documents to PC. It should be clarified whether "other documents" in para 72 do not include "documents such as the original certificate" of para 258 in order to avoid misunderstanding among contracting parties. One suggestion is to delete "documents such as" of para 258 for clarity.	O	

Reconciliation report for 2017-025_Draft_PT_Ir_Zeugodacus_tau_2021-03-01.docx (2017-025_Draft_PT_Ir_Zeugodacus_tau_2021-03-01.docx)

Summary

Title	2021 Second Consultation: Draft PT: Irradiation treatment for Zeugodacus tau (2017-025) (Id 1040)
Description	
End Date	30 9 2021 11:45 午後
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Participants

Name	Status	Role	Summary	Comments	Last Activity
Japan	In Progress	Reviewer		1	29 9 2021 9:51 午前

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S (Status) - A = Accepted, C = Closed, O = Open, W = Withdrawn, M = Merged

Para	Text	T	Comment	S	Author Comment
30	This treatment describes the irradiation of fruits and vegetables at 72Gy or 85Gy minimum absorbed dose to prevent the emergence of adults of <i>Zeugodacus tau</i> ¹ at the stated efficacy. ²	P	Category : EDITORIAL (22) Japan (29 9 2021 9:50 午前) In all adopted irradiation treatment schedules as annexes to ISPM28, "minimum absorbed dose" is described in the "Scope of the treatment" section. Need to be consistent with other annexes.	O	

Reconciliation report for 2017-036_Draft_PT_Ir_Sternochetus_frigidus_2021-04-28.docx (2017-036_Draft_PT_Ir_Sternochetus_frigidus_2021-04-28.docx)

Summary

Title	2021 Second Consultation: Draft PT: Irradiation treatment for <i>Sternochetus frigidus</i> (2017-036) (Id 1039)
Description	
End Date	30 9 2021 11:45 午後
Review Status	In Progress (Due: 30 9 2021 11:45 午後; Started: 30 6 2021 3:27 午後)

Participants

Name	Status	Role	Summary	Comments	Last Activity
Japan	In Progress	Reviewer		2	29 9 2021 10:02 午前

T (Type) - B = Bullet, C = Comment, P = Proposed Change, R = Rating

S (Status) - A = Accepted, C = Closed, O = Open, W = Withdrawn, M = Merged

Para	Text	T	Comment	S	Author Comment
Treatment description					
37	Target regulated article Fruit of <i>Mangifera indica</i>	P	Category : EDITORIAL (19) Japan (29 9 2021 9:59 午前) Specify the part of the plant targeted for the treatment like other PTs.	O	
Other relevant information					
45	The Technical Panel on Phytosanitary Treatments based its evaluation of this treatment on the research reported by Obra <i>et al.</i> (2014), which determined the efficacy of irradiation of Sternochetus frigidus <i>S. frigidus</i> on mangoes.	P	Category : EDITORIAL (20) Japan (29 9 2021 10:02 午前) Suggest full scientific name to be shown in consistent with other annexes of ISPM28.	O	

Reconciliation report for 2017-037038_Draft_PT_Vapour_MA_C_pomonella_G_molesta_2021-03-09.docx (2017-037038_Draft_PT_Vapour_MA_C_pomonella_G_molesta_2021-03-09.docx)

Summary

Title	2021 Second Consultation: Draft PT for Vapour heat - modified atmosphere treatment for Cydia pomonella and Grapholita molesta (Id 1037)
Description	Topic number: 2017-037/038
End Date	30 9 2021 11:45 午後
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Participants

Name	Status	Role	Summary	Comments	Last Activity
Japan	Completed	Reviewer		8	30 9 2021 9:23 午前

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Para	Text	T	Comment	S	Author Comment
G	(General Comment)	C	<p><i>Category : TECHNICAL</i> (41) Japan (30 9 2021 4:44 午前) General comment -1: "Comment about efficacy level" Please make a response in the TPPT report to our comment below about efficacy level Japan put forward during the first consultation. - Quote - "According to the draft standard, the amount of treated insects for calculation of the efficacy is 25,882 and the efficacy level of the treatment is 99.9884%. However, many countries (including Japan) use a treatment in actual international trade for which the amount of treated insects is more than 30,000 and the efficacy level is more than 99.99%. Japan would like to recommend that more than 30,000 be tested so that more countries will be able to adopt the treatment schedule. For reference, "Guidelines for the Development of Vapor Heat Disinfestation Treatments for Fruit Fly Host Commodities" published by Phytosanitary Measures Research Group (PMRG) in February 2019 mentions that "an example of a procedure (of large scale testing) that has been widely used is mortality trials testing 30,000". - Unquote - Minimum efficacy level for TPPT</p>	O	

		<p>consideration.</p> <p>If this standard or other treatment standards with a similar or lower efficacy level are adopted one after another, a concern is that disputes might happen among contracting parties regarding the acceptance of use of the standards. In addition, ISPM28 3.3 "Feasibility and applicability" describes "versatility of the phytosanitary treatment (e.g. application to a wide range of countries, pests and commodities)" as one of the elements of evaluation for treatment. In order a wide range of countries to use the annexes of ISPM 28, we would like to suggest TPPT to discuss whether a minimum efficacy level can be decided for Annexes of ISPM 28. While it might be difficult to decide one single criteria for all treatment methods and pests, it may be possible and useful to decide the criteria for certain treatment methods and certain groups of pest.</p>	
G	(General Comment)	<p>C <i>Category : TECHNICAL</i> (40) Japan (30 9 2021 4:43 午前) General comment -2: Differences in the responses of different populations of pests to heat treatments Regarding differences in the responses of different populations of pests to heat treatments, in comparative research between populations of <i>Bactrocera dorsalis</i> from three different regions (China, Kenya, and Thailand), the research indicated there were regional differences in heat tolerance among these populations (i.e. differences were observed at sub-lethal doses). But their differences were not significant at the levels required for phytosanitary treatments, so the TPPT concluded that the proposed treatment schedule might be broadly applicable geographically (TPPT Report, 2017; Hallman et al., 2018). However, <i>Cydia pomonella</i> (codling moth) is also widespread throughout the world, their habitats are wider and different from those of <i>B. dorsalis</i>. Therefore, it is hard to deny the differences in the responses of populations of codling moths from different regions to heat treatments, as seen in populations of <i>B. dorsalis</i>. There is no information on the heat tolerance of codling moth, but it is considered that there is no data that can compare the differences</p>	O

			<p>between the populations because the heat treatment is not used for the codling moth. Similarly, there are no comparative studies between populations by combined treatment with MA. On the other hand, in the methyl-bromide fumigation treatment widely used for codling moth in apple fruits, it is known that there are differences in the responses of populations of codling moths from different regions to the treatment. Under this circumstance, we would like to have a detailed explanation why the proposed vapor heat-modified atmosphere treatment schedule may be applicable geographically broadly without considering the differences in heat tolerance between populations of codling moth from different habitats.</p>	
G	(General Comment)	C	<p><i>Category : TECHNICAL</i> (39) Japan (30 9 2021 4:42 午前) General comment -3: The reason why the 4th instar larvae on apple fruits are considered to be the most tolerant stage In the examination of this draft treatment schedule, the data from Neven et al. (2006a) (apple) and Neven et al. (2006b) (peach and nectarine) are used as the basis for considering the draft treatment schedule. However, as shown below, it is considered that the treatment schedule is drafted not necessarily based on the data of both papers.</p> <ul style="list-style-type: none"> - Both papers indicate eggs tend to be more heat-tolerant than 4th instar larvae, but we would like to have an explanation why the treatment schedule is drafted as 4th instar larvae as the most tolerant stage. - The data from both papers show that peaches tend to be more difficult to treat pests than apples. But we would like to have an explanation why TPPT evaluated this treatment schedule to be also effective to peaches though the draft schedule shows the effectiveness of apples' data only. <p>(Reference information from Neven et al. (2006a) (apple) and Neven et al. (2006b) (peach and nectarine)) (a) As TPPT evaluates as "there is only a small difference between life stage responses", the data on Neven et al. (2006a) and Neven et al. (2006b) indicate that eggs tend to be more heat-tolerant</p>	O

		<p>than 4th instar larvae.</p> <p>Effect of CATTs treatments on mortality of the different growing stages of codling moth. The figures in the parenthesis is lethal times in hours with 95% CL.</p> <p>Apple (LT99): 4th instar larvae (3.05 hrs) < red ring eggs (3.86 hrs)</p> <p>Peach (LT99): 4th instar larvae (3.14 hrs) < blackhead eggs (4.06 hrs)</p> <p>(Neven et al. (2006a) (apple) and Neven et al. (2006b) (peach and nectarine))</p> <p>In addition, Neven et al. (2006b) indicates that a part of 480 eggs of codling moths laid in peaches survived after treated under the similar condition of the draft treatment schedule (Fig 3 of the paper), even though 480 of 4th instar larvae were killed 100% (Fig 4 of the paper). These results also suggest that the mortality of eggs is lower than that of 4th instar larvae.</p> <p>(b) Apples and peaches were treated under the same conditions at both studies, Neven et al. (2006a) and Neven et al. (2006b). Comparing the data from both studies, the mortality rate in peaches is likely to be lower than one in apples in both egg and 4th instar larval stages.</p> <p>Effect of CATTs treatments on mortality of the different life stages of codling moth in apples and peaches. The figures in the parenthesis are lethal times in hours with 95% CL.</p> <p>4th instar larval (LT99): apples (3.05 hrs) < peaches (3.14 hrs)</p> <p>Egg (LT99): apples (3.22 hrs) < peaches (4.06 hrs)</p> <p>(c) Despite there are the data such as (a) and (b), TPPT concluded the 4th instar larvae on apple fruits are the most tolerant stage.</p>		
G	(General Comment)	<p>C</p> <p><i>Category : TECHNICAL</i></p> <p>(38) Japan (30 9 2021 4:41 午前)</p> <p>General comment -4: The level of efficacy of the treatment schedule should be shown by each commodity.</p> <p>As described in "Issues associated with phytosanitary treatments" in "7.6 Technical Panel on Phytosanitary Treatments (TPPT)" in the Procedure manual, contracting parties should consider the level of efficacy of a</p>	O	

			<p>phytosanitary treatment in determining whether the treatment can be used as a phytosanitary measure. In such case, contracting parties need to evaluate the level of efficacy for each commodity (i.e., pathway). Therefore, the level of effectiveness should be shown by each targeted commodity (i.e., each by peach and apple) on the treatment schedule. According to the TPPT report (July 2019), the level of efficacy on this treatment schedule is 99.9884% based on apples' data from Neven et al. (2006b) and supplementary data. However, as Japan points out in the general comment -2, the mortality in peaches tends to be lower than the one in apples. The level of efficacy in peaches may be a different figure (i.e., it may be less percentage than 99.9884%). Even if peaches and apples indicate the same level, it should show each commodity's figures with the rationale. It is considered that contracting parties can evaluate the effectiveness of treatment schedules for each commodity only by comparing the figures based on the data.</p>		
G	(General Comment)	C	<p><i>Category : TECHNICAL</i> (37) Japan (30 9 2021 4:41 午前) General comment -5: About the effect of treatment schedule on fruits of different sizes</p> <p>In the draft treatment schedule, even if the heat-up time is within 2.5 hours, the treatment process can be completed as long as the temperature of the fruit core reaches 44.5 ° C, and then the temperature can be maintained for 30 minutes. However, since the heat capacity varies depending on the size of fruits, the time to reach the specified fruit core temperature is different between the small size and the large size of fruits under the same internal temperature at the chamber.</p> <p>In actual commercial treatment, when fruits of a size smaller than the fruit size used in the studies (i.e., fruit size considered to be implemented in this treatment schedule) by Neven et al. (2006a) and Neven et al. (2006b) are used, the time to reach the specified temperature (44.5 ° C of fruits core) may be shorter than 2.5 hours even if the temperature and condition are the same at the chamber. In that case, even if it is</p>	O	

			<p>maintained for 30 minutes after that, the total processing time is less than 3 hours, and there is a possibility that it does not finally reach the amount of heat and the exposure time of the modified atmosphere required to kill the target pests in the fruits thoroughly.</p> <p>It is necessary to adjust the maintenance time according to the length of the heat-up time so that the difference in fruit size does not affect the treatment result, i.e. the total treatment time should constantly keep 3 hours by adjusting the heat-up time and the maintenance time to each length.</p> <p>If you think that it is not necessary to revise the current treatment schedule (i.e., if you think that the maintenance time of the treatment does not need to consider the difference in fruit size), we would like you to explain the reason.</p> <p>Please also see the comment for para 38.</p>	
Treatment schedule				
35	with air temperature held at <u>45-46</u> °C or above;	P	<p><i>Category : TECHNICAL</i> (29) Japan (29 9 2021 10:13 午前) In the reference papers, the temperature at the chamber was raised to 46 ° C. The fruit core temperature, the heat-up time and the maintenance time of the treatment schedule are established based on the reference papers. Therefore, it is considered that the prescribed treatment schedule cannot be achieved unless the temperature at the chamber is set to 46 ° C according to the papers.</p>	O
37	to reach a fruit core temperature of 44.5 °C or above within not more than 2.5 hours <u>hours(heat-up time)</u> ;	P	<p><i>Category : TECHNICAL</i> (30) Japan (29 9 2021 10:15 午前) See the comment to paragraph 38 from Japan</p>	O
38	<u>continuously</u> , to maintain a fruit core temperature of 44.5 °C or above and relative humidity 90% or above for at least 30 minutes <u>until a total of 3 hours including the actual heat-up time is reached</u> .	P	<p><i>Category : TECHNICAL</i> (31) Japan (29 9 2021 10:16 午前) Please also see the general comment 5. Even if treatment is conducted according to the proposed treatment schedule, it may not achieve the same mortality level as the studies conducted by Neven et al. (2006a) and Neven et al. (2006b), when smaller size fruits than those used in the studies are used and the time to reach the specified temperature (44.5 °C of fruits core) is shorter than 2.5 hours. So, there is a need to set up a total treatment time required to achieve the mortality.</p>	O

