Reconciliation report for 2019-008_DraftISPM_CommodityStandard_En_2020-02-08.docx (2019-008_DraftISPM_CommodityStandard_En_2020-02-08.docx)

Summary

Title	2020 First Consultation: Draft ISPM: Commodity-based standards for phytosanitary measures (2019-008) (Id 786)
Description	
End Date	30 9 2020 11:45 午後
Review Status	In Progress (Due: 30 9 2020 11:45 午後; Started: 1 7 2020 11:55 午前)

Participants

Name	Status	Role	Summary	Comments	Last Activity
Japan	In Progress	Reviewer		24	29 9 2020 9:20 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S (Status) - A = Accepted, C = Closed, O = Open, W = Withdrawn, M = Merged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	*Category : SUBSTANTIVE* **(62) Japan (25 8 2020 1:22 午後)** 1. We believe that it is difficult to categorize the measures into three categories (i.e. high, medium, and low) in an objective manner according to the confidence in different types of measures. We propose deletion of section 5 "Confidence in measures". If the current requirements of the draft ISPM are used, it is difficult to avoid arbitrary evaluation and to categorize the measures objectively (low, medium, high). There are various types of measures (e.g. treatment, test, pest free area, systems approach) of which the natures and methods are substantially different, so it is quite difficult to sort the measures into three categories in an impartial and rational manner. Confidence in measures may also increase or decrease depending on situation in conducting measures (i.e. outdoor or indoor, density of pests, existence of vectors). Instead of deletion of section 5, we suggest that the information on measures be included in commodity standard as	O	

			additional information in an appendix as stated in paragraph 91 so that countries can use the information as reference when considering the measures to be adopted.		
G	(General Comment)	C	*Category : SUBSTANTIVE* **(240) Japan (22 9 2020 9:23 午前)** 2. This draft ISPM should include the format of a list or lists of pests and a list or lists of measures.	O	
G	(General Comment)	C	*Category : SUBSTANTIVE* **(241) Japan (22 9 2020 9:27 午前)** 3. Only pests which have appropriate measures should be included in the list. All pests which are included in the list should be indicated with any appropriate measure.	O	
G	(General Comment)	C	*Category : SUBSTANTIVE* **(310) Japan (23 9 2020 7:01 午前)** 4. Topics for the development of specific commodity standards should be selected according to the procedure on Call for topics. The criteria for inclusion in the List of topics need to be defined taking into account in the report of Focus Group on Commodity and Pathway Standards, June 2019.	O	
G	(General Comment)	C	*Category : SUBSTANTIVE* **(309) Japan (23 9 2020 6:54 午前)** 5. The whole structure of ISPMs related to commodity standards (new, under-development and existing ones) is not clear. Specifically, it is not clear: - whether the draft commodity standards for cut flower and grain currently in pending status will be developed or given up. - the relationship between existing commodity standards (e.g. seed, wood) and the concept commodity standard - how to decide whether new specific commodity standards are attached to the overarching commodity standard or other ISPMs as per para 130. It is better to specify such whole structure on commodity standards.	O	
Scope					

31	The scope of this standard and its annexes does not include consideration of contaminating pests or diversion from intended ~~use~~use of commodities.	P	*Category : EDITORIAL* **(242) Japan (22 9 2020 9:30 午前)** To clarify the meaning of the sentence.	O	
38	Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such standards contain lists of pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists of pests include those known to be associated with the specified commodity and intended use. ~~Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being traded.~~ The 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	*Category : SUBSTANTIVE* **(244) Japan (22 9 2020 9:37 午前)** The sentence does not need to be included in the "Outline of Requirements" as it is not a major issue in commodity standards.	O	
38	Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such standards contain lists of pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists of pests include those known to be associated with the specified commodity and intended use. Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being traded. The 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	*Category : SUBSTANTIVE* **(245) Japan (22 9 2020 9:42 午前)** See general comment 1. It is quite difficult to sort the measures into three categories in an impartial and rational manner.	O	
38	Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such standards contain lists of pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists of pests include those known to be associated with the specified commodity and its intended use. Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being traded. The 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	*Category : EDITORIAL* **(243) Japan (22 9 2020 9:31 午前)** To clarify the meaning of the sentence.	O	
Background					
43	The IPPC Strategic Framework 2020–2030 proposes the development of ISPMs for	P	*Category : SUBSTANTIVE* **(246) Japan (22 9 2020 9:47 午前)**	O	

	specific commodities, with accompanying ~~diagnostic protocols,~~ phytosanitary treatments and guidance, to simplify trade and expedite market-access negotiations.		Delete diagnostic protocols to avoid confusion as they are currently not included as the content of the draft commodity standards.		
44	The purpose of this standard is to provide guidance on the development and use of commodity standards. Such standards, presented as annexes to this standard, are designed to support the development of phytosanitary import requirements that facilitate safe trade.	P	*Category : SUBSTANTIVE* **(247) Japan (22 9 2020 9:52 午前)** This draft ISPM provides not only guidance on the use of commodity standards but also guidance on the development of the standards (e.g. criteria for inclusion of measures).	O	
1. Purpose and Use of Commodity Standards					
58	Measures contained within commodity standards should be considered when developing phytosanitary import requirements. These standards may serve to facilitate the evaluation of such measures in PRA (or other comparable examination and evaluation). ~~These standards may also be useful during market access discussions.~~	P	*Category : SUBSTANTIVE* **(248) Japan (22 9 2020 2:50 午後)** To avoid duplication with paragraph 62.	O	
62	facilitating ~~market access~~ market access discussions	P	*Category : EDITORIAL* **(249) Japan (22 9 2020 2:54 午後)** To consistent with other ISPMs such as ISPM30.	O	
63	facilitating safe trade - supporting countries to consider effective phytosanitary measures to prevent the entry and establishment of regulated pests according to their own situation.	P	*Category : SUBSTANTIVE* **(482) Japan (30 9 2020 8:28 午前)** Preventing the entry and establishment of pests is one of the main goals of IPPC and it is an important benefit for countries. Supporting countries to consider effective phytosanitary measures according to each country situation will contribute to the goal.	O	
65	identifying and increasing awareness of measures available to minimize ~~pests~~ pest risk associated with the movement of commodities in international trade.	P	*Category : EDITORIAL* **(250) Japan (22 9 2020 2:55 午後)**	O	
2.1 Scope					
79	A commodity standard clearly describes the specific commodity and its intended use, and covers a discrete set of pests and related options for phytosanitary measures. The scope of commodity standards does not include diversion from intended use.	P	*Category : SUBSTANTIVE* **(251) Japan (22 9 2020 3:14 午後)** It should be also clarified in the scope of specific commodity standards.	O	
2.2 Description of the commodity and its intended use					
81	The description of the commodity and its intended use is intended to provide sufficient information to allow the identification of a focused list of pests and associated options for phytosanitary measures. The intended use of the commodity is given because of the influence it has on the pest risk posed by the commodity, as described in ISPM 32 (~~This section clearly describes the commodity and its~~	P	*Category : SUBSTANTIVE* **(314) Japan (24 9 2020 1:43 午後)** To avoid redundancy with paragraph 79.	O	

	~~intended use. The description is intended to provide sufficient information to allow the identification of a focused list of pests and associated options for phytosanitary measures. The intended use of the commodity is given because of the influence it has on the pest risk posed by the commodity, as described in ISPM 32~~ (~~*Categorization of commodities according to their pest risk*~~).				
2.3 Pests					
83	This section includes a list or lists of pests that are known to be associated with the commodity described. Criteria for inclusion of pests include the availability of ~~a~~ an appropriate PRA, or other technical justification, and regulation by at least one contracting party. Where necessary, the sources of information that an organism was determined as a pest in a PRA or others should be made available to evaluate whether the determination is supported by scientifically sound rationale, when the Technical Panel on Commodity Standards or any contracting party requests so. The list or lists of pests are presented in tabular format with the corresponding options for phytosanitary measures (see below).	P	*Category : SUBSTANTIVE* **(252) Japan (22 9 2020 3:23 午後)** Regarding "criteria for inclusion of pests", the selection of pests should be based on the availability of "an appropriate PRA" in which reliable information used in the PRA, not "the availability of an appropriate PRA". For example, even if a PRA is available, a pest species which should not be scientifically targeted might be selected as a target pest if the information of the PRA is inappropriate or the judgment in PRA is incorrect. In fact, there are inappropriate cases that target such pests based on PRAs as follows: - Non-seed transmitted pests are selected as pests in seeds; - Field disease pests are selected as pests on commodities for human consumption which are not likely to be a pathway of the pests; - Pests are selected as targeted pests based on only information experimental hosts. From a viewpoint of transparency and ensuring the sources of information, the information of the reason why pests were included in PRAs should be surely available so that these sources are used for consideration by TPCS and contracting parties.	O	
85	This section may also include information on pests known to be associated with the plant species but, based on available scientific information, known not to be associated with the traded commodity described (e.g. pests associated with *Mangifera indica* for propagation but not with the traded commodity, mango fruit). In such case, relevant explanation should be added.	P	*Category : SUBSTANTIVE* **(253) Japan (22 9 2020 3:28 午後)** Relevant explanation about pests known to be associated with the plant species but known not to be associated with the traded commodity should be added to this section, as it is useful for contracting parties to consider import requirements.	O	
2.4 Options for phytosanitary measures					

91	The measures are presented in the table or tables of pests known to be associated with the commodity, with each measure being listed against the corresponding pest or pests that it controls. A description of each measure, sufficient to indicate its use and practical application, is provided. ~~When necessary, additional~~ Additional information on the measures, such as the information by which the inclusion of the measures ~~may~~ in a commodity standard is decided based on the criteria set out in Section4, should be included in an appendix.	P	*Category : SUBSTANTIVE* **(483) Japan (30 9 2020 8:30 午前)** We suggest to include in an appendix the information by which the inclusion of the measures is decided based on Section 4 because such information (e.g. experimental data) is useful for countries to consider the measures to be adopted. Delete “when necessary” and change from “may” to “should” as it is essential to include the information on measures in a commodity standard.	O	
91	The measures are presented in ~~the~~ a table or tables ~~of~~ with pests known to be associated with the ~~commodity, with each measure~~ commodity being listed against the corresponding ~~pest or pests~~ measures that ~~it controls~~control the pests. A description of each measure, sufficient to indicate its use and practical application, is provided. When necessary, additional information on the measures may be included in an appendix.	P	*Category : SUBSTANTIVE* **(312) Japan (24 9 2020 9:25 午前)** We suggest that the structure of the table of measures is rather “Measure A - Pest A, B, C…” than “Pest A - Measure A, B, C…” in alignment with the RSPM on mango as the structure looks more user-friendly.	O	
4. Criteria for Inclusion of Measures in Commodity Standards					
97	A measure is considered for inclusion in a commodity standard by the Technical Panel for Commodity Standards when it is, or has been, set as a phytosanitary import requirement by at least one contracting party (and hence in operation between at least two contracting parties) or when included in at least one bilateral arrangement. Inclusion in the standard is further supported if one or more of the following criteria are met:	P	*Category : SUBSTANTIVE* **(254) Japan (22 9 2020 3:35 午後)** Add "by the Technical Panel for Commodity Standards" as the consideration of measures for inclusion in a commodity standard is conducted by the TPCS.	O	
110	private or public sector research indicates that the measure is effective. . experimental data (e.g. efficacy level) indicates that the measure is effective.	P	*Category : SUBSTANTIVE* **(255) Japan (22 9 2020 3:38 午後)** The experimental data such as efficacy level is also useful to indicate that the measure is effective.	O	
5. Confidence in Measures					
115	~~**5. Confidence in Measures**~~	P	*Category : SUBSTANTIVE* **(306) Japan (23 9 2020 5:54 午前)** See general comment 1. We suggest to delete this section. It is difficult to avoid arbitrary evaluation and to categorize the measures objectively (low, medium, high). There are various types of measures (e.g. treatment, test, pest free area, systems approach) of which the natures and methods are substantially different, so it is quite difficult to sort the measures into three categories in an impartial and rational manner.	O	

			Confidence in measures may also increase or decrease depending on situation in conducting measures (i.e. outdoor or indoor, density of pests, existence of vectors). Instead of deletion of section 5, we suggest that the information on measures be included in commodity standard as additional information in an appendix as stated in paragraph 91 so that countries can use the information as reference when considering the measures to be adopted.		

Reconciliation report for 2015-011_Rev1_Draft_ISPM_12_PCs_reexport_02-06-2020.docx (2015-011_Rev1_Draft_ISPM_12_PCs_reexport_02-06-2020.docx)

Summary

Title	2020 First Consultation: DRAFT ISPM: Focused revision of ISPM 12 in relation to re-export (2015-011) (Id 783)
Description	
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Participants

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Japan	In Progress	Reviewer		8	28 9 2020 5:54 午後

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	*Category : SUBSTANTIVE* **(156) Japan (23 9 2020 9:41 午前)** "change their nature"(para229) Paragraph 229 states, as the requirement for phytosanitary certificate for re-export, "The plants or plant products of the consignment for re-export have not been grown, or processed to change their nature, in the country of re-export.". It is unclear what "change their nature" means. For example, if seeds for re-export are coated or pelletized, these processes are not considered to be included in the "change their nature". It should be clarified what "change their nature" includes.	O	
G	(General Comment)	C	*Category : SUBSTANTIVE* **(155) Japan (23 9 2020 9:41 午前)** Issuance of phytosanitary certificate for re-export Especially for seeds, various treatments and processing (such as sorting, blending, pesticide treatment, hot water treatment, dry heat treatment, coating) are actually performed in the re-exporting countries. In many cases, it is possible to issue a phytosanitary certificate for re-export. But it is unclear which requirement in this ISPM stipulates whether a phytosanitary certificate for re-export can be issued, or a phytosanitary certificate for export need to	O	

			be issued. Apart from the ISPM, we suggest to develop an implementation material that can be used as a reference when implementing the ISPM. And it should include how to issue phytosanitary certificates when processing or treatment is performed in the re-export situation.		
5. Guidelines and Requirements for Completing Sections of a Phytosanitary Certificate for Export					
164	If plants were imported to or moved within a country and have **subsequently** been grown for a specific period of time (depending on the commodity concerned, but usually one growing season or more), these plants may be considered to have changed their country or place of origin, provided that the ~~phytosanitary status~~ **pest risk** is ~~determined~~ affected only by that country or place of further growth.	P	*Category : SUBSTANTIVE* **(158) Japan (24 9 2020 9:46 午前)** As the term "phytosanitary status" is changed to "pest risk" it is more appropriate to change the verb from "determined" to another word, such as "affected".	O	
6.1 Considerations for issuing a phytosanitary certificate for re-export					
229	**The ~~plants or~~ plants, plant products or other regulated articles of the consignment for re-export have not been grown, or processed to change their nature, in the country of re-export.**	P	*Category : SUBSTANTIVE* **(159) Japan (24 9 2020 9:53 午前)** Other regulated articles may be processed to change their nature (e.g. dismantling of used agricultural machinery).	O	
6.1.2Repacking, storing, splitting or combining consignments					
241	**A** ~~Re-export~~ phytosanitary certificat**e for re-export** ~~ion~~ may still be **issued** ~~performed~~ if the consignment has been **repacked, reloaded,** stored, split up~~,~~ **or** combined with other **imported** consignments ~~or repackaged~~, provided that it has not been exposed to infestation or contamination by pests**. If a possible risk of infestation or contamination is identified, an additional inspection or test should be carried out to verify that the consignment has not been exposed to infestation or contamination by pests**.	P	*Category : SUBSTANTIVE* **(13) Japan (25 8 2020 11:26 午前)** In addition to inspection, test should be included to verify no infestation or contamination.	O	
6.2 Considerations for issuing a phytosanitary certificate for export in certain re-export cases					
251	**Instead, t**~~T~~he NPPO of the country of re-export, on request by exporters, may carry out **inspection, ~~testing~~test, treatment or another** appropriate phytosanitary **action,** ~~procedures~~ and if the NPPO is confident that the phytosanitary import requirements are met**,** it should issue a phytosanitary certificate for export. The **country** ~~place~~ of origin should still be indicated in brackets **in the place of origin section of** ~~on~~ the phytosanitary certificate for export.	P	*Category : EDITORIAL* **(160) Japan (24 9 2020 10:03 午前)** To align the words in the draft ISPM.	O	
253	**Documents such as the original phytosanitary certificate or its certified copy may be attached to the phytosanitary certificate for export if they contain information from the country of origin that was used to complete the phytosanitary certificate for export. In such case, the number of phytosanitary certificate for export by the country of origin may be provided in the additional declaration section of the phytosanitary certificate for export~~Additional declarations from the original phytosanitary certificate or its certified copy may be transferred to the phytosanitary certificate for export to	P	*Category : SUBSTANTIVE* **(139) Japan (21 9 2020 9:44 午前)** Additional declaration from the original phytosanitary certificate should not be transferred to the phytosanitary certificate for export. The first sentence of paragraph 253 is not consistent with paragraph 246 (see below). As the NPPO of the country of re-export receives original phytosanitary certificate, it can attach the original phytosanitary certificate or its certified copy	O	

	~~attest compliance with 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. Documents such as the original phytosanitary certificate or its certified copy may be attached to the phytosanitary certificate for export if they contain information from the country of origin that was used to complete the phytosanitary certificate for export.~~		to the phytosanitary certificate for export so that importing countries can confirm compliance with import phytosanitary requirements. [246]Additional declarations on phytosanitary certificates for re-export where required should be based on the activities of the NPPO of the country of re-export. Additional declarations from the original phytosanitary certificate or certified copies should not be transferred to phytosanitary certificates for re-export. When the original phytosanitary certificate or its certified copy is attached to the phytosanitary certificate for export, the number of original phytosanitary certificate may be included in the phytosanitary certificate for export so that importing country can confirm that the attached original PC is surely linked to the phytosanitary certificate for export.		
6.3 General considerations for re-export situations					
254	**6.3 ~~General~~ Other considerations for re-export situations**	P	*Category : SUBSTANTIVE* **(140) Japan (21 9 2020 9:48 午前)** To align with the context in this section. The title of the current section is duplicated with section 6.1.3 "General considerations" and may be confusing.	O	

Reconciliation report for 2015-014_Draft_ISPM_Audit_2020-06-20.docx (2015-014_Draft_ISPM_Audit_2020-06-20.docx)

Summary

Title	2020 First Consultation: Draft ISPM Audit in the phytosanitary context (2015-014) (Id 784)
Description	
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Participants

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

Para	Text	T	Comment	S	Author Comment
G	(General Comment)	C	*Category : SUBSTANTIVE* **(324) Japan (23 9 2020 9:38 午前)** 1. It is unclear whether "an NPPO" in the draft ISPM refers to importing NPPO or exporting NPPO. We suggest to specify importing or exporting NPPO in the draft ISPM where possible.	O	
G	(General Comment)	C	*Category : SUBSTANTIVE* **(277) Japan (22 9 2020 8:42 午前)** 2. There are similar meaning terms in this draft ISPM such as "purpose" and "objectives", "findings" and "observations", and "conformity" and "compliance". If there is no difference in the meaning of the terms, they should be unified.	O	
G	(General Comment)	C	*Category : SUBSTANTIVE* **(278) Japan (22 9 2020 8:44 午前)** 3. The relationship between “verification procedure” and “audit” (para 29) The terms “verification procedure” and “audit” are used in many parts of the existing ISPMs, but both terms are used as the same objectives in some cases. So countries may be confused about how "audit" or "verification procedure" will be applied to their phytosanitary context. It should be clarified in the scope that “audit” is one method of verification procedures in	O	

			the phytosanitary context.		
G	(General Comment)	C	*Category : SUBSTANTIVE* **(279) Japan (22 9 2020 8:46 午前)** 4. The difference between a system audit and a verification audit (para 56, 57)(Potential implementation issues) The difference in the definition and explanation between a system audit and a verification audit is not clear. Both types need a clear definition and explanation in the ISPM because each type has different purpose. This is because the requirements for each type are not clearly described in the draft ISPM separately for each type For example, - What kind of cases will be dealt with by each type, - How to implement each type and - What requirements need to be included in each type. However, these infomation may be better to be provided in an implementation material of ISPM. Implementation material may be necessary to be developed as soon as the ISPM is approved to implement audit programme in the phytosanitary context.	O	
Scope					
29	Audit is a documented process and one of verification procedures. Audit in the phytosanitary context is a systematic examination of a process to determine whether it conforms with the phytosanitary requirements set by a national plant protection organization (NPPO). This standard covers audits in the phytosanitary context conducted by the 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 in its territory.	P	*Category : SUBSTANTIVE* **(5) Japan (25 8 2020 12:45 午後)** See general comment 3. Add a sentence to clarify the scope of audit more.	O	
Background					
38	~~National plant protection organizations~~ NPPOs have a number of obligations and responsibilities under the IPPC, such as surveillance, inspections, establishment of phytosanitary import requirements, phytosanitary certification, conduct or supervision of treatments, conduct of pest risk analysis, and training of staff. To help them fulfil these obligations effectively, NPPOs are increasingly using audits to provide confidence that phytosanitary systems and procedures achieve their objectives.	P	*Category : EDITORIAL* **(280) Japan (22 9 2020 8:49 午前)**	O	
2. Types of Audit					
56	A **system audit** is a comprehensive review of ~~a~~ an entire system or procedure to	P	*Category : SUBSTANTIVE*	O	

	assess its effectiveness and conformity with established phytosanitary requirements. It is conducted to determine if the system or procedure is designed to achieve its objectives and if the auditee has sufficient capability to implement the system or procedures. In general, it may be done initially before authorizing an entity or a new process, or it may be done where necessary. The scope of a system audit may include an entire system from production to export, a system of a particular entity, or particular processes and procedures relevant to a phytosanitary system.		**(14) Japan (26 8 2020 12:03 午後)** To differentiate system audit and verification audit. Add the information about the timing for conducting this type of audit. This type is a comprehensive review of an entire system or procedure, so in general, it may be done initially before authorizing an entity or a new process.		
57	A **verification audit** is a ~~comprehensive~~ focused review of ~~particular elements of a~~ an entire system or procedure through especially reviewing its particular elements to indicate its effectiveness and conformity with established phytosanitary requirements. It is conducted to determine if the system or procedure is properly being implemented and maintained. It may be conducted periodically (at either regular or random intervals) or non-periodically (as a result of certain triggers).	P	*Category : SUBSTANTIVE* **(15) Japan (26 8 2020 12:03 午後)** To differentiate system audit and verification audit. A verification audit is a focused review of an entire system or procedure through reviewing particular elements of the system or procedure.	O	
4.3.1 Specific responsibilities of entities authorized to conduct an audit					
99	immediately notify the authorizing NPPO of any ~~critical~~ nonconformities.	P	*Category : SUBSTANTIVE* **(283) Japan (22 9 2020 9:04 午前)** Not only critical nonconformities but also other nonconformities should be informed to the NPPO. Whether a nonconformity is critical or other should be decided by NPPO as stated in paragraph 176.	O	
6. Frequency of Audit					
111	Audit may be conducted periodically or non-periodically. ~~National plant protection organizations~~ NPPOs should determine the frequency of audits of the system or procedure being audited when they set up an audit programme, and review this as appropriate. The audit frequency may be influenced by:	P	*Category : EDITORIAL* **(281) Japan (22 9 2020 8:59 午前)**	O	
10. Settlement of Disputes					
125	The process for settlement of disputes ~~should~~ may be established in advance of audits, as part of establishing the audit framework.	P	*Category : SUBSTANTIVE* **(9) Japan (25 8 2020 12:56 午後)** The process for settlement of disputes is not always necessary as any dispute does not arise in many cases.	O	
11.3.2 Evaluation stage					
164	identifying and informing the auditee of any nonconformities during the audit and immediately informing the NPPO of any ~~critical~~ nonconformities.	P	*Category : SUBSTANTIVE* **(282) Japan (22 9 2020 9:02 午前)** Not only critical nonconformities but also other nonconformities should be informed to the NPPO. Whether a nonconformity is critical or other should be decided by NPPO as stated in paragraph 176.	O	

Reconciliation report for 1994-001_Draft_2019-2020_AmendmentsISPM5_En_2020-06-08_Clean.docx (1994-001_Draft_2019-2020_AmendmentsISPM5_En_2020-06-08_Clean.docx)

Summary

Title	2020 First Consultation: Draft 2019 and 2020 Amendments to ISPM 5 (1994-001) (Id 781)
Description	
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Participants

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Para	Text	T	Comment	S	Author Comment
2.1 “emergency action” (2018-044)					
55	A prompt ~~**phytosanitary**~~ **official** ~~**action**~~ operation for pests undertaken in a new or unexpected phytosanitary situation	P	*Category : SUBSTANTIVE* **(56) Japan (18 9 2020 10:00 午前)** The draft definition is vague on what is the target of the ‘official operation’, so add ‘for pests’ in order to clarify the official operation more. The pests here could include any type of pest (i.e. regulated pest, non-regulated pest, pest not previously assessed), so we propose to say just ‘Pests’ in the definition.	O	

Reconciliation report for 2017-013_DRAFT_PT_CT_ Bactrocera_onCitrussinensis_2020-03-05_en.docx (2017-013_DRAFT_PT_CT_ Bactrocera_onCitrussinensis_2020-03-05_en.docx)

Summary

Title	2020 first consultation Draft PT: Cold treatment for Bactrocera zonata on Citrus sinensis (2017-013) (Id 776)
Description	
End Date	30 9 2020 11:45 午後
Review Status	In Progress (Due: 30 9 2020 11:45 午後; Started: 1 7 2020 9:19 午前)

Participants

Name	Status	Role	Summary	Comments	Last Activity
Japan	In Progress	Reviewer		2	24 9 2020 12:12 午後

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 schedule					
35	The fruit must reach the treatment temperature before treatment exposure time commences. The fruit core temperature should be monitored and recorded, and the temperature should not exceed the stated level throughout the duration of the treatment.	P	*Category : TECHNICAL* **(15) Japan (18 9 2020 8:26 午前)** As defined in section 4.2 of ISPM 42, the fruit core temperature should be monitored during cold treatment, so add “core” to clarify the monitoring point. In addition, it is mentioned that "thermocouples was placed in the center of noninfested oranges" according to Hallman et al., (2013a).	O	
Other relevant information					
40	This schedule was based on the work of Hallman *et al.* (2013a, b), Hashem *et al.* (2004) and Mohamed and El-Wakkad (2009). The schedule was developed using cultivars "XXXX".	P	*Category : TECHNICAL* **(16) Japan (18 9 2020 8:32 午前)** It should include the cultivars which was used for the development of treatment schedule as reference information. The adopted PTs of temperature treatment have information on cultivars which was used for the development of treatment schedule.	O	

Reconciliation report for 2017-029_DRAFT_PT_Cold_Leucotreta_Citrus_sinensis_2020-02-17_en.docx (2017-029_DRAFT_PT_Cold_Leucotreta_Citrus_sinensis_2020-02-17_en.docx)

Summary

Title	2020 first consultation Draft PT: Cold treatment for Thaumatotibia leucotreta on Citrus sinensis (2017-029) (Id 782)
Description	
End Date	30 9 2020 11:45 午後
Review Status	In Progress (Due: 30 9 2020 11:45 午後; Started: 1 7 2020 9:20 午前)

Participants

Name	Status	Role	Summary	Comments	Last Activity
Japan	In Progress	Reviewer		1	23 9 2020 8:52 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 schedule					
37	For both schedules, fruit must reach the treatment temperature before treatment exposure time commences. The fruit core temperature should be monitored and recorded, and the temperature should not exceed the stated level throughout the duration of the treatment.	P	*Category : TECHNICAL* **(15) Japan (18 9 2020 9:06 午前)** As defined in section 4.2 of ISPM 42, the fruit core temperature should be monitored during cold treatment, so add “core” to clarify the monitoring point.	O	

Reconciliation report for 2017-037&038_DRAFT_PT_Vapour_ heattrtm_Cydia_pomonella_Grapholita_molesta_2020-03-05_en.docx (2017-037&038_DRAFT_PT_Vapour_ heattrtm_Cydia_pomonella_Grapholita_molesta_2020-03-05_en.docx)

Summary

Title	2020 first consultation Draft PT: Vapour heat–modified atm treatm for Cydia P. - Grapholita M (2017-037 and 2017-038) (Id 777)
Description	
End Date	30 9 2020 11:45 午後
Review Status	In Progress (Due: 30 9 2020 11:45 午後; Started: 1 7 2020 9:25 午前)

Participants

Name	Status	Role	Summary	Comments	Last Activity
Japan	In Progress	Reviewer		3	29 9 2020 9:16 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	*Category : SUBSTANTIVE* **(20) Japan (18 9 2020 9:46 午前)** 1. 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”. 2. Neven&Rehfield-Ray (2006) indicates that 31,331 insects in apple were treated, but the amount of treated insects for calculation of the efficacy is 25,882 in the draft standard. It is not clear why the deference of the numbers occurs, so it is recommended that the source of information for calculating the number of treated insects as 25,882 be referred in the standard as reference.	O	

			3. The number of target pest and efficacy on peach should be described in the PT with relevant references after reviewing supplemental data if necessary. Para [126] of the 2019 TPPT report states that the fourth-instar larva of codling moth on apple is the most tolerant than other stages on apples and peaches (include nectarines). The level of efficacy stated in the PT was calculated based on the results of a confirmation test of VHT + MA treatment of codling moth on apple. However, ISPM28 annexes have not previously been examined whether the comparison of treatment efficacy across more than two commodities (cross-items) is appropriate, except for irradiation treatment and treatments against woods. While a phenomenon in which the treatment intensity differs between different fruit species is observed as described in Dohino et al. (2017), the reason for this has not been clarified. It may not be appropriate to carry out the evaluation for peaches in this draft under such circumstance. If peaches are to be included in the PT together with apples, peaches itself should be evaluated individually based on relevant references data of peaches, just like apples. 4. Japan would like to check whether TPPT has reviewed the difference of treatment tolerance between different geographical populations of target pests. Japan recognizes, through the past country consultations of Annexes of ISPM28, TPPT has reviewed potential differences of treatment tolerance between different geographic populations of Tephritidae against temperature treatment such as VHT, but has not yet reviewed those of Lepidoptera against VHT and MA.		
Treatment schedule					
34	to maintain a fruit core temperature of 44.5 °C or above and relative humidity ~~between~~ 90% ~~and 95%~~ or above for at least 25 minutes.	P	*Category : TECHNICAL* **(19) Japan (18 9 2020 9:42 午前)** It is considered that mortality is not affected even if the relative humidity exceeds 95%. In addition, the adopted PTs of vapor heat treatment do not have the upper limit of relative humidity.	O	
Other relevant information					

40	The air humidity is lower at the beginning of the treatment to prevent condensation on the fruit and hence maintain fruit quality. The schedule was developed using cultivars "XXXX".	P	*Category : TECHNICAL* **(18) Japan (18 9 2020 9:21 午前)** It should include the cultivars which was used for the development of treatment schedule as reference information. The adopted PTs of temperature treatment have information on cultivars which was used for the development of treatment schedule.	O	

Reconciliation report for 2017-015_DraftPT_Ir_Bactrocera_dorsalis_2020-02-14.docx (2017-015_DraftPT_Ir_Bactrocera_dorsalis_2020-02-14.docx)

Summary

Title	2020 Second consultation Draft annex to ISPM 28: Irradiation treatment for Bactrocera dorsalis (2017-015) (Id 767)
Description	
End Date	30 9 2020 11:45 午後
Review Status	In Progress (Due: 30 9 2020 11:45 午後; Started: 1 7 2020 9:26 午前)

Participants

Name	Status	Role	Summary	Comments	Last Activity
Japan	In Progress	Reviewer		1	23 9 2020 9:46 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 schedule					
39	~~This treatment should not be applied to fruits and vegetables stored in modified atmospheres because modified atmospheres may affect the treatment efficacy.~~	P	*Category : TECHNICAL* **(14) Japan (18 9 2020 12:32 午後)** According to the report on the TPPT meeting in July 2019, TPPT members concluded that no difference in survival of four Tephritid fruit fly species was found whether stored in low oxygen before and during irradiation or not. The TPPT invited the SC to consider the study on the effects of low oxygen on irradiation efficacy and the recommendation of the TPPT to remove the restriction form irradiation PTs for Tephritidae fruit flies.	O	

Reconciliation report for 2017-031_DraftPT_Anastrepha_2020-06-05.docx (2017-031_DraftPT_Anastrepha_2020-06-05.docx)

Summary

Title	2020 Second consultation Draft annex to ISPM 28: Irradiation treatment for the genus Anastrepha (2017-031) (Id 770)
Description	
End Date	30 9 2020 11:45 午後
Review Status	In Progress (Due: 30 9 2020 11:45 午後; Started: 1 7 2020 9:27 午前)

Participants

Name	Status	Role	Summary	Comments	Last Activity
Japan	In Progress	Reviewer		1	23 9 2020 9:47 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 schedule					
40	~~This irradiation treatment should not be applied to fruit and vegetables stored in modified atmospheres because modified atmospheres may affect the treatment efficacy.~~	P	*Category : TECHNICAL* **(8) Japan (21 9 2020 9:03 午前)** According to the report on the TPPT meeting in July 2019, TPPT members concluded that no difference in survival of four Tephritid fruit fly species was found whether stored in low oxygen before and during irradiation or not. The TPPT invited the SC to consider the study on the effects of low oxygen on irradiation efficacy and the recommendation of the TPPT to remove the restriction form irradiation PTs for Tephritidae fruit flies.	O	