

## 2024 FIRST CONSULTATION 1 July – 30 September 2024

### Compiled comments for Draft annex to ISPM 38 (*International movement of seeds*) on the design and use of systems approaches (2018-009) - English

**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**S** (Status) - A = Accepted, C = Closed, O = Open, W = Withdrawn, M = Merged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
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> <b>(828) Costa Rica (30 Sep 2024 11:28 PM)</b> Comments from the Latin American Workshop and OIRSA are supported.
G	(General Comment)	C	<i>Category : EDITORIAL</i> <b>(801) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b> Jamaica welcomes this annex as an important tool to be used in systems approaches.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> <b>(800) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b> The annex is well put together and detailed. It may require quite a lot of resources to implement.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> <b>(799) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b> Barbados is in support of this draft annex since it gives NPPO a roadmap to follow when importing seeds for planting.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> <b>(774) Belarus (30 Sep 2024 3:04 PM)</b> The Republic of Belarus would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> <b>(773) Antigua and Barbuda (30 Sep 2024 2:47 PM)</b> Antigua and Barbuda endorses the comments submitted in the CAHFSA workgroup and agreed to at the 2024 IPPC Regional Workshop for the Caribbean.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> <b>(772) Guyana (30 Sep 2024 2:05 PM)</b> Guyana endorses the comments submitted by CAHFSA in its entirety.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> <b>(771) Barbados (30 Sep 2024 12:28 PM)</b> Barbados endorses the comments as submitted by CAHFSA.
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> <b>(762) Korea, Republic of (30 Sep 2024 7:59 AM)</b> This annex is describe that when multiple countries recognize the same system approach, it can become a multilateral system approach, which may

			<p>be suitable for the nature of international seed trade.</p> <p>While Korea acknowledges that this multilateral systems approach could be ideal, there are concerns regarding the fact that the international seed trade does not yet have experience with this approach.</p> <p>Korea express the following concerns regarding the implementation of a multilateral systems approach.</p> <p>1. Harmonizing plant quarantine import requirements across countries can be difficult. Each country may have their own regulated pest and requirements related seeds, so it is difficult to establish a unified systems applicable to all countries. Especially, there is no international consensus on seed borne pests. There is disagreement between industry and NPPO on the regulated pest for seeds.</p> <p>2. Some countries may have regulatory framework that do not allow multilateral systems approach, which may make to hard for those countries to participate in SA.</p> <p>3. If the SA is not adopted in all countries at the same time, if the seed need to be re-exported to a country that does not accept the SA, it may have to meet the current import requirement. In other word, the exporting countries operate two systems. As a result, the exporting country might have to operate two systems simultaneously, which could increase confusion and complexity for seed exports.</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i></p> <p><b>(719) Peru (29 Sep 2024 7:56 PM)</b></p> <p>Peru supports the comments made by COSAVE</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p><b>(708) Saint Vincent and The Grenadines (29 Sep 2024 5:21 PM)</b></p> <p>St.Vincent and the Grenadines is in full agreement with the comments from the IPPC Caribbean workshop on this draft</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p><b>(602) Nigeria (28 Sep 2024 1:43 AM)</b></p> <p>NIGERIA SUPPORTS THE USE OF SYSTEMS APPROACH.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p><b>(591) Germany (27 Sep 2024 5:58 PM)</b></p> <p>Germany would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p><b>(589) European Union (27 Sep 2024 5:51 PM)</b></p> <p>The current draft appears not to be fully developed (in terms of duplications, redundancies, and structure) and it is somewhat unbalanced (e.g., the long list of critical control points, the large role of participating entities, the reliance on performance criteria). The draft would benefit from a thorough round of improvement.</p>

		<p>-Phytosanitary certification: It is appreciated that the current draft refers to the use of a systems approach for phytosanitary certification to meet phytosanitary import requirements, and in that sense it is used as an option for phytosanitary certification, not an "alternative system". It should be noted that in some paragraphs there is some ambiguity on this aspect.</p> <p>-Role of NPPOs: Furthermore, the current draft does not place the required emphasis on the role of the NPPO and many of the fundamental concerns raised by the European region still exist. There is a long way to go to get this into a suitable text. We have made several proposals.</p> <p>-ISPM 14 (The use of integrated measures in a SA for pest risk management): One of the main concerns is the inconsistencies of the current draft with ISPM 14. It is unclear what level of control by the NPPO can be exerted on performance criteria, and to what extent this fits with the requirements for authorisation, which should be based on audits by the NPPO. A key requirement in ISPM 14 is that a systems approach must have at least two independent measures. How an NPPO assesses the independence of the measures that take place as existing production is not well-documented by the current draft. A novel aspect of the current draft Annex in comparison to ISPM 14 is that it focuses on the use of multiple measures against multiple pests. According to ISPM 14, it is the responsibility of the importing countries to identify the pests of concern. The evaluation of the systems approach (on whether the measures within the systems approach are efficacious and on whether the systems approach as a whole delivers the required level of assurance), would require the establishment of a pest list for a specific seed commodity. The second novelty of this current draft Annex in comparison to ISPM 14 is the potential multilateral aspect of a systems approach. This multilateral aspect conflicts with the bilateral nature of phytosanitary certification, but given the international trade in seeds, and the common use of re-exports, the draft might also benefit from a description of the steps/considerations needed for the systems approach to be recognized by several importing countries. e.g. it is not clear from the current draft how non-conformities would be treated in a multilateral system and how common pest lists would be established. Conceptually, there is considerable overlap with ISPM 14.</p> <p>-Authorized entities: A better link with ISPM 45 (Requirements for national plant protection organizations if authorizing entities to perform phytosanitary actions) should also be established. At present, ISPM 45 is only mentioned in the context of non-conformities. For example, ISPM 14 states that "The minimum</p>
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			<p>requirements for a measure to be considered a required component for a systems approach are that the measure: - is clearly defined - is efficacious - is officially required (mandatory) - can be monitored and controlled by the responsible NPPO. It is unclear how existing production practices and quality systems used by authorized entities can be considered mandatory. The Annex should describe the necessary steps to ensure that existing production practice would develop into a clearly defined mandatory measure that is controlled by the NPPO. Only then, would an importing NPPO be able to evaluate whether the systems approach would deliver the required level of assurance.</p> <p>-Draft Annex to ISPM 39 (Use of SA in managing the pest risk associated with the movement of wood): The global steward should be advised to review the Draft Annex to ISPM 39 on systems approaches for wood which is under progress, and should try to align the text more with that draft. An option could be to have the Annex for systems approach for wood adopted first and use that as a model.</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i> <b>(579) Chile (27 Sep 2024 4:09 PM)</b> Chile supports the comments made by COSAVE</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> <b>(552) Kenya (26 Sep 2024 12:02 PM)</b> Kenya supports the use of the systems approach. However there is need to support the capacity in the area of systems approach especially in the developing countries and the use of the Beyond Compliant Global tools.</p>
G	(General Comment)	C	<p><i>Category : EDITORIAL</i> <b>(546) Eswatini (25 Sep 2024 10:09 AM)</b> The Kingdom of Eswatini is fine with the draft standard</p>
G	(General Comment)	C	<p><i>Category : EDITORIAL</i> <b>(545) Brazil (24 Sep 2024 5:33 PM)</b> Brazil supports the comments made by COSAVE</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> <b>(544) United Kingdom (24 Sep 2024 4:50 PM)</b> The UK would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System. EPPO have submitted these comments on behalf of the UK and as such they should be considered as UK national comments.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> <b>(543) Switzerland (24 Sep 2024 12:21 PM)</b> Switzerland would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> <b>(528) United States of America (20 Sep 2024 5:23 PM)</b> The draft annex represents a significant step forward in the development of the Systems Approach (SA) as an alternative option to the current</p>

		<p>requirements for seed health tests for the phytosanitary certification of seed consignments. However, several fundamental issues remain to be resolved before the SA will become a viable option both for the international phytosanitary regulatory community and seed industry. Key issues include:</p> <ul style="list-style-type: none"> <li>-The concept of holistic pest risk management is critical for NPPOs to understand and embrace in order for the SA to become a viable option for seed phytosanitary certification; it would be very helpful to include a section that discusses the difference between holistic pest risk management and individual pest risk management.</li> <li>-New approaches for pest risk assessment may need to be explored for SA applications as the focus should be on evaluating whether or not SA/QM practices can be considered equivalent to current phytosanitary requirements (pest risk has already been determined and market access approved for seed species in question);</li> <li>- The focus on global harmonization should be on harmonizing a global SA framework (e.g. ReFreSH) and not on the SA practices themselves;</li> <li>- A new system for achieving multilateral acceptance will be needed as many companies market seed to many different countries;</li> <li>-There needs to be a recognition by the IPPC of the need for close collaboration between the seed industry and the regulatory community at all levels.</li> </ul>
G	(General Comment)	<p>C <i>Category : SUBSTANTIVE</i>  <b>(529) United States of America (20 Sep 2024 6:35 PM)</b>  There are two different scenarios where a systems approach for seeds could be implemented.</p> <ol style="list-style-type: none"> <li>1. The more traditional situation (already happens in many other commodities). A country currently does not have market access to export their seed to another country. <ol style="list-style-type: none"> <li>i. In this case, an NPPO would do a PRA including evaluation of the necessary risk management measures in light of the pest risk.</li> <li>ii. An importing NPPO might require a specific systems approach in order to mitigate the Q pests of concern that were identified in the PRA pest list.</li> <li>iii. In this case, the importing NPPO would also independently design the required SA and tell the exporting country what needs to be done if they want export to their country.</li> </ol> </li> <li>2. The voluntary alternative situation. There might already be market access and the goal here is different. <ol style="list-style-type: none"> <li>i. The company wants to produce seed and manage pests in a comprehensive way, using HACCP and a systems approach, and using their existing practices and quality system, with transparency to and overseen by the exporting NPPO and approved by importing NPPO(s).</li> <li>ii. The goal will be to meet the import requirements of potentially multiple importing countries using one comprehensive systems approach, accredited</li> </ol> </li> </ol>

			<p>and overseen by the NPPO of the country of production.</p> <p>iii. Each importing NPPO will have their own pest list and will evaluate the systems approach proposed to determine whether all risks are sufficiently mitigated. Since mitigations may often address groups of pests, it's likely that most specific pests on the importing NPPO pest list will be mitigated, but if not, the importing NPPO may request additional mitigations within the systems approach before they would accept seeds certified on this basis.</p> <p>iv. Instead of a market access request, industry would likely come to the NPPOs with interest to produce seed under a voluntary SA, using their existing production practices, quality system components, and, if deemed necessary by the importing NPPO, additional mitigations.</p> <p>v. Here the process is going to be collaborative between the producer and NPPOs. They work together to develop a SA, with CCPs and multiple mitigations, that meets importing NPPO(s) requirements.</p> <p>The annex doesn't separate these two scenarios and as a result, it goes back and forth between statements that make sense in one scenario but not the other. For example, there are some statements that the NPPO identifies CCPs, designs the SA, and communicates requirements (makes sense for scenario #1) and other statements about voluntary alternative and collaboration between NPPO and the participating entity (makes sense for #2).</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i></p> <p><b>(540) Uruguay (21 Sep 2024 1:32 PM)</b></p> <p>Uruguay agrees with COSAVE comments</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i></p> <p><b>(512) Japan (20 Sep 2024 10:35 AM)</b></p> <p>Japan recognizes the importance of developing a standard on systems approach for seeds as systems approach could be a useful option for phytosanitary measure for seeds.</p> <p>We also understand that it is vital to collaborate with stakeholders to manage the pest risk through the seed supply chain, and it would be appropriate that the measures be designed based on the assumption that seed producers and other related parties assume certain roles and responsibilities in the systems approach.</p> <p>Furthermore, to ensure the effective operation of the systems approach, it is important that NPPOs issuing the phytosanitary certificate take the responsibility for measures implemented in their territory, for example, by monitoring the practices conducted by entities.</p> <p>However, we understand that there is almost no experience of multilateral systems approach described in this draft in actual seed trades. Given the lack of information on its effectiveness and usefulness, further study is needed to clarify the specific implementation system and operational scheme of the systems approach in order to develop an ISPM. We think if there are countries or organizations that are conducting pilot studies, their experiences should be</p>

			shared among contracting parties and then discussions should take place.
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i>  <b>(456) EPPO (15 Sep 2024 5:49 PM)</b></p> <p>The current draft appears not to be fully developed (in terms of duplications, redundancies, and structure) and it is somewhat unbalanced (e.g., the long list of critical control points, the large role of participating entities, the reliance on performance criteria). The draft would benefit from a thorough round of improvement.</p> <p>-Phytosanitary certification:  It is appreciated that the current draft refers to the use of a systems approach for phytosanitary certification to meet phytosanitary import requirements, and in that sense it is used as an option for phytosanitary certification, not an "alternative system". It should be noted that in some paragraphs there is some ambiguity on this aspect.</p> <p>-Role of NPPOs:  Furthermore, the current draft does not place the required emphasis on the role of the NPPO and many of the fundamental concerns raised by the European region still exist. There is a long way to go to get this into a suitable text. We have made several proposals.</p> <p>-ISPM 14 (The use of integrated measures in a SA for pest risk management):  One of the main concerns is the inconsistencies of the current draft with ISPM 14. It is unclear what level of control by the NPPO can be exerted on performance criteria, and to what extent this fits with the requirements for authorisation, which should be based on audits by the NPPO. A key requirement in ISPM 14 is that a systems approach must have at least two independent measures. How an NPPO assesses the independence of the measures that take place as existing production is not well-documented by the current draft.</p> <p>A novel aspect of the current draft Annex in comparison to ISPM 14 is that it focuses on the use of multiple measures against multiple pests. According to ISPM 14, it is the responsibility of the importing countries to identify the pests of concern. The evaluation of the systems approach (on whether the measures within the systems approach are efficacious and on whether the systems approach as a whole delivers the required level of assurance), would require the establishment of a pest list for a specific seed commodity. The second novelty of this current draft Annex in comparison to ISPM 14 is the potential multilateral aspect of a systems approach. This multilateral aspect conflicts with the bilateral nature of phytosanitary certification, but given the international trade in seeds, and the common use of re-exports, the draft might also benefit from a description of the steps/considerations needed for the systems approach to be recognized by several importing countries. e.g. it is not clear from the current draft how non-conformities would be treated in a</p>

		<p>multilateral system and how common pest lists would be established. Conceptually, there is considerable overlap with ISPM 14.</p> <p>-Authorized entities: A better link with ISPM 45 (Requirements for national plant protection organizations if authorizing entities to perform phytosanitary actions) should also be established. At present, ISPM 45 is only mentioned in the context of non-conformities. For example, ISPM 14 states that 'The minimum requirements for a measure to be considered a required component for a systems approach are that the measure: - is clearly defined - is efficacious - is officially required (mandatory) - can be monitored and controlled by the responsible NPPO. It is unclear how existing production practices and quality systems used by authorized entities can be considered mandatory. The Annex should describe the necessary steps to ensure that existing production practice would develop into a clearly defined mandatory measure that is controlled by the NPPO. Only then, would an importing NPPO be able to evaluate whether the systems approach would deliver the required level of assurance.</p> <p>-Draft Annex to ISPM 39 (Use of SA in managing the pest risk associated with the movement of wood): The global steward should be advised to review the Draft Annex to ISPM 39 on systems approaches for wood which is under progress, and should try to align the text more with that draft. An option could be to have the Annex for systems approach for wood adopted first and use that as a model.</p>
G	(General Comment)	<p>C <i>Category : SUBSTANTIVE</i> <b>(346) New Zealand (11 Sep 2024 12:26 AM)</b> The concept has value but at present it is unclear how this annex improves the understanding of the framework for establishing and evaluating systems approaches for multilateral acceptance specifically for seed, compared with a bilateral approach. It is also unclear how the framework integrates measures that manage pest risk directly (e.g. ALPP, treatments etc) compared to the administrative measures that provide assurance that pest risk is managed (e.g. traceability, NPPO oversight, verification testing).</p> <p>This annex needs to be strongly supported by implementation materials to be successful. For example implementation materials could include:</p> <ul style="list-style-type: none"> <li>• An example pest risk management plan with types of supporting data that show how effective measures are</li> <li>• Examples of appropriate measures for different pest types and the types of data needed to support these</li> <li>• Appropriate verification activities for independent measures for types of pest groups</li> <li>• How to scale pest threshold levels for to account for varying ALOPs</li> <li>• An example of what a multilateral agreement could look like</li> </ul>

			<ul style="list-style-type: none"> <li>• Examples of contingency actions when a system approach fails in one or more countries in a multilateral agreement</li> <li>• The minimum elements of what a systems manual would look like</li> <li>• Examples of ADs that could be used to facilitate movement of seed under a multilateral systems approach</li> <li>• Case studies to support the application etc.</li> </ul>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i>  <b>(340) Viet Nam (2 Sep 2024 11:48 PM)</b>  Vietnam supports the Draft Annex to ISPM 38 with consensus comments from other countries.</p>
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i>  <b>(271) Zambia (22 Aug 2024 5:52 AM)</b>  Zambia is fine with the draft</p>
G	(General Comment)	C	<p><i>Category : EDITORIAL</i>  <b>(257) South Africa (20 Aug 2024 2:38 PM)</b>  The draft is well written</p>
G	(General Comment)	C	<p><i>Category : EDITORIAL</i>  <b>(256) South Africa (20 Aug 2024 1:02 PM)</b>  No comments</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i>  <b>(171) COSAVE (18 Aug 2024 11:55 PM)</b>  Global change, use practices to refer to production practices applied by participating entities in a SA. Use measures when these practices are integrated in a systems approach</p>
G	(General Comment)	C	<p><i>Category : TECHNICAL</i>  <b>(3) Egypt (29 Jul 2024 12:34 AM)</b>  The draft annex of the standard includes the involvement of stakeholders in the implementation of phytosanitary measures alongside the NPPO (originally implementing the plant quarantine measures), we are have concerns to the approval of this draft as an annex to ISPM 38. Since the only entity responsible for implementing the provisions of the International Plant Protection Convention is the NPPO, it is the sole entity to supervise or implement the treatments and phytosanitary measures in general, which are included in the international phytosanitary standards issued by the international agreement, (whether in the importing or exporting country). Since any stage in the issuance of certificates depends only on the NPPO, which in turn does not give the product owner the right to participate in implementing any quarantine procedure on its products.  If the recommendation contained in this standard requires the accreditation of the National Plant Protection Organization in the importing country, the certificates issued for seed production, this will violate the plant quarantine legislation, for example in Egypt and many countries in the region, which only rely on the procedures implemented by NPPO in the exporting country without sharing other entities, especially stakeholders</p>

1	<b>DRAFT ANNEX TO ISPM 38: Design and use of systems approaches for phytosanitary certification of seeds (2018-009)</b>	C <i>Category : SUBSTANTIVE</i> <b>(812) Australia (30 Sep 2024 7:52 PM)</b> Australia is grateful for the country consultation on this draft Annex to allow all contracting parties to review and provide their input, as per the Standard Setting process.  We do not consider that this document meets the need of the region as majority are 'end-users' of seeds. We do not consider that this adds any more support than already provided in ISPM 38 and ISPM 14. For our region, a list of pest and measures similar to commodity standards would be more helpful in trade.  For any systems approach for seed, greater transparency is required to give assurance to end-user countries on the pest status of the seed.
1	<b>DRAFT ANNEX TO ISPM 38: Design and use of systems approaches for phytosanitary certification of seeds (2018-009)</b>	C <i>Category : SUBSTANTIVE</i> <b>(807) Viet Nam (30 Sep 2024 6:00 PM)</b> Viet Nam propose: - Add definition of "multi-system approach"; because it is not included in ISPM 5 yet - In sector 2-3, it is essential to specify critical control points further because Viet Nam is still developing, the resources are still limited. - Establishing a comprehensive system that entails various measures and critical control points (CCPs) is rather complex. Particularly for developing countries with limited resources such as Vietnam. Moreover, continuous monitoring and evaluation of the systems's efficacy requires significant resources from NPPOs, this factor undeniably put pressure on NPPO of exporting countries. - In Section 6, 'Multilateral systems approaches' of the Annex, it is important to consider the following points: +For multilateral approaches, the harmonization of requirements and processes between multiple countries can be challenging due to distinction in regulations, laws, and capabilities of each country. +Identifying and handling non-compliance cases can be problematical, particularly in a multinational context.
1	<b>DRAFT ANNEX TO ISPM 38: Design and use of systems approaches for phytosanitary certification of seeds (2018-009)</b>	C <i>Category : SUBSTANTIVE</i> <b>(806) Russian Federation (30 Sep 2024 5:14 PM)</b> 'General comment': "The Russian Federation would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System"
1	<b>DRAFT ANNEX TO ISPM 38: Design and use of systems approaches for phytosanitary certification of seeds (2018-009)</b>	C <i>Category : SUBSTANTIVE</i> <b>(804) Nepal (30 Sep 2024 3:40 PM)</b> This standard must acknowledge the diverse legal perspective of the Contracting Parties that seed movement is governed by more than one law and institutions.

1	<b>DRAFT ANNEX TO ISPM 38: Design and use of systems approaches for phytosanitary certification of seeds (2018-009)</b>	C	<p><i>Category : SUBSTANTIVE</i>  <b>(802) Nepal (30 Sep 2024 3:35 PM)</b>  This standard should be well aligned with Convention on Biological Diversity 1992 and International Treaty on Plant Genetic Resources for Food and Agriculture.</p>
1	<b>DRAFT ANNEX TO ISPM 38: Design and use of systems approaches for phytosanitary certification of seeds (2018-009)</b>	C	<p><i>Category : SUBSTANTIVE</i>  <b>(671) Malawi (29 Sep 2024 11:13 AM)</b>  We support the Draft to ISPM 38</p>
1	<b>DRAFT ANNEX TO ISPM 38: Design and use of systems approaches for phytosanitary certification of seeds (2018-009)</b>	C	<p><i>Category : SUBSTANTIVE</i>  <b>(578) Myanmar (27 Sep 2024 10:13 AM)</b>  We agree to adopt the Draft Annex to ISPM 38.</p>
1	<b>DRAFT ANNEX TO ISPM 38: Design and use of systems approaches for phytosanitary certification of seeds (2018-009)</b>	C	<p><i>Category : SUBSTANTIVE</i>  <b>(555) Canada (26 Sep 2024 7:34 PM)</b>  General comment on the draft annex:</p> <p>1) The overall concept is not very clear. A review of the structure and removal of redundancies may help. There is overlap between this annex and the ISPM 38 (and other standards such as ISPM 45). More specific comments are provided in the text.</p> <p>2) Revisions should be made on the role of entities. Negotiations for systems approaches are normally done between the NPPOs or Contracting parties of different countries. The entities collaborate with the NPPO of the country where they are located but ultimately the responsibility resides with the NPPO of the exporting country.</p> <p>3) The Annex does not provide an outlook on a 'clear and simple system' to move seed internationally. Implementation of this annex may lead to a more complex system.</p>
31	<b>1. Introduction</b>  <b>Scope</b>	P	<p><i>Category : TECHNICAL</i>  <b>(337) COSAVE (26 Aug 2024 7:31 PM)</b>  For consistency with Annex to ISPM 39 under consultation</p>
32	This annex provides a general, standardized framework of requirements for national plant protection organizations (NPPOs) if developing systems approaches for seeds as an option for phytosanitary certification. Recognition of a systems approach by NPPOs may form the basis for phytosanitary certification of seeds, serving as an alternative to single measures such as seed treatment or seed testing when issuing a phytosanitary <del>certificate</del> <u>certificate as approved by NPPO of participating country</u> . This annex describes the role and responsibilities of NPPOs in a systems approach for seeds and, if applicable, the role and responsibilities of	P	<p><i>Category : TECHNICAL</i>  <b>(803) Nepal (30 Sep 2024 3:36 PM)</b></p>

	participating entities.		
32	This annex provides a <del>general, standardized general</del> framework of requirements for national plant protection organizations (NPPOs) if developing systems approaches for seeds as <del>an a pest risk management</del> option <del>for in support of</del> phytosanitary certification. Recognition of a systems approach by NPPOs may form the basis for phytosanitary certification of seeds, serving as an alternative to single measures such as seed treatment or seed testing when issuing a phytosanitary certificate. This annex describes the role and responsibilities of NPPOs in a systems approach for seeds and, if applicable, the role and responsibilities of participating entities.	P	Category : EDITORIAL <b>(775) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b> This is a standard and so the word 'standardize' is redundant
32	This annex provides a general, standardized framework of requirements for national plant protection organizations (NPPOs) if developing systems approaches for seeds as an option for phytosanitary certification. Recognition of a systems approach by NPPOs may form the basis for phytosanitary certification of seeds, serving as an alternative to single measures such as seed treatment or seed testing when issuing a phytosanitary certificate. This annex describes the role and responsibilities of NPPOs in a systems approach for seeds and, if applicable, the role and responsibilities of participating entities.  <u>This annex does not focus on any particular seed species but does address specific characteristics of the seed movement, such as the potentially long periods over which seeds can be stored and moved to many different customers in different countries</u>	P	Category : SUBSTANTIVE <b>(621) Mexico (28 Sep 2024 10:12 PM)</b> Moving paragraph [45] up here, and changing some wording for better understanding.
32	This annex provides <del>for national plant protection organizations (NPPOs)</del> a general, standardized framework of requirements for <del>national plant protection organizations (NPPOs) if developing systems approaches for seeds as an option for phytosanitary certification</del> <u>approaches, including existing pest management practices used in the seed industry in combination with quality systems that incorporate defined audit and verification procedures. Recognition of a</u> systems approach <u>recognizaed</u> by NPPOs may form the basis for phytosanitary certification of seeds, serving as an alternative to single measures such as seed treatment or seed <del>testing when issuing a phytosanitary certificate</del> <u>testing</u> . This annex describes the <del>role and</del> responsibilities of NPPOs in a systems approach for seeds and, <del>if applicable,</del> the role and responsibilities of participating entities.	P	Category : SUBSTANTIVE <b>(619) Mexico (28 Sep 2024 10:01 PM)</b> Adding wording extracted from Spec. 70, for better understanding.  Changing the wording for better understanding.
32	This annex provides a general, standardized framework of requirements for	C	Category : SUBSTANTIVE

	national plant protection organizations (NPPOs) if developing systems approaches for seeds as an option for phytosanitary certification. Recognition of a systems approach by NPPOs may form the basis for phytosanitary certification of seeds, serving as an alternative to single measures such as seed treatment or seed testing when issuing a phytosanitary certificate. This annex describes the role and responsibilities of NPPOs in a systems approach for seeds and, if applicable, the role and responsibilities of participating entities.		<b>(603) European Union (28 Sep 2024 1:57 AM)</b> This annex does not give a clear guideline or framework for NPPOs regarding the development, recognition and auditing of a systems approach for seeds.
32	This annex provides a general, standardized framework of requirements for national plant protection organizations (NPPOs) <del>if-when</del> developing systems approaches for seeds as an option for phytosanitary certification. Recognition of a systems <del>approach</del> <u>approaches</u> by NPPOs may <del>form the basis be of interest</del> for phytosanitary certification of seeds, <del>serving as</del> <u>it offers</u> an alternative to single measures such as seed treatment or seed <del>testing when issuing a phytosanitary certificate</del> <u>testing</u> . <del>This annex describes the role and responsibilities of NPPOs in a systems approach for seeds and, if applicable, the role and responsibilities of participating entities.</del>	P	<i>Category : TECHNICAL</i> <b>(601) European Union (28 Sep 2024 1:02 AM)</b> 1) First sentence: "when" seems to be a more appropriate term than "if" in this sentence.  2) Second sentence: - More appropriate wording proposed. "Recognition" could also be replaced simply with "Use". - Simplification: "when issuing a phytosanitary certificate" is not needed because "phytosanitary certification" is mentioned in the first part of the sentence.  3) Last sentence moved to the scope – better fit.
32	This annex provides a <del>general, standardized</del> framework of requirements for national plant protection organizations (NPPOs) if developing systems approaches for seeds as an option for phytosanitary certification. Recognition of a systems approach by NPPOs may form the basis for phytosanitary certification of seeds, serving as an alternative to single measures such as seed treatment or seed testing when issuing a phytosanitary certificate. This annex describes the role and responsibilities of NPPOs in a systems approach for seeds and, if applicable, the role and responsibilities of participating entities.	P	<i>Category : TECHNICAL</i> <b>(556) Canada (26 Sep 2024 7:51 PM)</b> Suggested edits are intended to clarify the text. Could NPPOs consider alternative options in establishing a SA for Seeds? The annex mentions that the scope is a broad systems approach which may include measures and practices used by entities. However, the annex mainly focuses on quality systems implemented by entities.
32	This annex provides a general, standardized framework of requirements for national plant protection organizations (NPPOs) if developing systems approaches for seeds as an option for phytosanitary certification. Recognition of a systems approach by NPPOs may form the basis for phytosanitary certification of seeds, serving as an alternative to <del>single measures one or more a traditional phytosanitary measures, (e.g., such as seed treatment treatment, field inspection, or seed testing when issuing a phytosanitary certificate)</del> <u>testing</u> . This annex describes the role and responsibilities of NPPOs in a systems approach for seeds and, if applicable, the role and responsibilities of participating entities.	P	<i>Category : TECHNICAL</i> <b>(473) United States of America (17 Sep 2024 4:57 PM)</b> Clarity of the scope

32	This annex provides a general, standardized framework of requirements for national plant protection organizations (NPPOs) <del>if-when</del> developing systems approaches for seeds as an option for phytosanitary certification. Recognition of a systems <del>approach-approaches</del> by NPPOs may <del>form the basis be of interest</del> for the phytosanitary certification of seeds, <del>serving as it offers</del> an alternative to single measures such as seed treatment or seed <del>testing when issuing a phytosanitary certificate testing</del> . <del>This annex describes the role and responsibilities of NPPOs in a systems approach for seeds and, if applicable, the role and responsibilities of participating entities.</del>	P	<p><i>Category : TECHNICAL</i>  <b>(385) EPPO (15 Sep 2024 5:49 PM)</b></p> <p>1) First sentence: "when" seems to be a more appropriate term than "if" in this sentence.</p> <p>2) Second sentence:  - More appropriate wording proposed. "Recognition" could also be replaced simply with "Use".  - Simplification: "when issuing a phytosanitary certificate" is not needed because "phytosanitary certification" is mentioned in the first part of the sentence.</p> <p>3) Last sentence moved to the scope – better fit.</p>
32	This annex provides a general, standardized framework of requirements for national plant protection organizations (NPPOs) if developing systems approaches for seeds as an option for phytosanitary certification. Recognition of a systems approach by NPPOs may form the basis for phytosanitary certification of seeds, serving as an alternative to single measures such as seed treatment or seed testing when issuing a phytosanitary certificate. This annex describes the role and responsibilities of NPPOs in a systems approach for seeds and, if applicable, the role and responsibilities of participating entities.	C	<p><i>Category : SUBSTANTIVE</i>  <b>(386) EPPO (15 Sep 2024 5:49 PM)</b></p> <p>This annex does not give a clear guideline or framework for NPPOs regarding the development, recognition and auditing of a systems approach for seeds.</p>
32	This annex provides a general, standardized framework of requirements for national plant protection organizations (NPPOs) if developing systems approaches for seeds as an option for phytosanitary certification. Recognition of a systems approach by NPPOs may form the basis for phytosanitary certification of seeds, serving as an alternative to <u>a</u> single measures <u>(e.g., such as seed <del>treatment treatment, field inspection, or seed testing-testing</del>)</u> when issuing a phytosanitary certificate. This annex describes the role and responsibilities of NPPOs in a systems approach for seeds and, if applicable, the role and responsibilities of participating entities.	P	<p><i>Category : TECHNICAL</i>  <b>(383) United States of America (12 Sep 2024 4:28 PM)</b></p> <p>Clarity of the intent.</p>
32	This annex provides a general, <del>standardized</del> framework of requirements for national plant protection organizations (NPPOs) if developing systems approaches for seeds as an option for <del>phytosanitary certification. Recognition of a systems approach by NPPOs may form the basis for phytosanitary certification of seeds; pest risk management</del> serving as an <del>alternative to stand-alone phytosanitary measures such as seed treatment or seed testing alternative</del> . <del>This annex describes the essential elements of a systems approach for seeds being moved internationally</del>	P	<p><i>Category : SUBSTANTIVE</i>  <b>(172) COSAVE (19 Aug 2024 12:06 AM)</b></p> <p>1) Standardized deleted redundant. 2) SA is an option for pest risk management not for phytosanitary certification. 2) Second sentence deleted as a consequential change according comments for the first sentence of the paragraph, 3) Text added moved from paragraph 40 modified to add that the resulting SA may be developed by NPPOs for consistency with para 47, 4) If applicable deleted because the draft describes the responsibilities of entities</p>

	<del>for any purpose, which may include practices already used by entities. The resulting systems approach may be developed, evaluated and approved by NPPOs as a way to single measures such meet phytosanitary import requirements and, therefore as seed treatment or seed testing when issuing a basis for phytosanitary certificate certification. It describe the responsibilities of NPPOs and the responsibilities of participating entities.- This annex describes the role and responsibilities of NPPOs in a systems approach for seeds and, if applicable, the role and responsibilities of participating entities.</del>		
32	This annex provides a general, standardized framework of requirements for national plant protection organizations (NPPOs) if developing systems approaches for seeds as an option for phytosanitary certification. Recognition of a systems approach by NPPOs may form the basis for phytosanitary certification of seeds, serving as an alternative to single measures such as seed treatment or seed testing when issuing a phytosanitary certificate. This annex describes the role and responsibilities of NPPOs in a systems approach for seeds and, if applicable, the role and responsibilities of participating entities.	C	Category : <i>SUBSTANTIVE</i> <b>(258) Guinea-Bissau (21 Aug 2024 11:44 AM)</b> We have no comments, we agree with COSAVE coments
32	<del>This annex provides a general, standardized framework of requirements for national plant protection organizations (NPPOs) if developing systems approaches for seeds as an option for phytosanitary certification. Recognition of a systems approach by NPPOs may form the basis for phytosanitary certification of seeds, serving as an</del> En este anexo se proporciona un marco general y estandarizado de requisitos para las organizaciones nacionales de protección fitosanitaria (ONPF) en caso de que se desarrollen enfoques de sistemas para las semillas como una opción para el manejo del riesgo. El reconocimiento de un enfoque de sistemas por parte de las ONPF puede constituir la base para la certificación fitosanitaria de semillas, sirviendo como una <del>alternative to single measures such as seed treatment or seed testing when issuing a phytosanitary certificate</del> alternativa a medidas únicas como el tratamiento o el análisis de las semillas al expedir un certificado fitosanitario . <del>This annex describes the role and responsibilities of NPPOs in a systems approach for seeds and, if applicable, the role and responsibilities of participating entities.- En este anexo se describen las funciones y las responsabilidades de las ONPF en un enfoque de sistemas para las semillas y, las funciones y las responsabilidades de las entidades participantes.</del>	P	Category : <i>EDITORIAL</i> <b>(127) Nicaragua (18 Aug 2024 4:15 PM)</b> redacción sobre la función
33	<del>Systems approaches may include, in addition to commonly used phytosanitary</del>	P	Category : <i>SUBSTANTIVE</i> <b>(620) Mexico (28 Sep 2024 10:06 PM)</b>

	<del>measures, components of the existing production practices and quality systems used by participating entities, as far as they relate to pest management. These components can be effective at reducing pest risk to a level that is sufficient to meet phytosanitary import requirements as evaluated by NPPOs. When such components are used in a systems approach, NPPOs should collaborate closely with the participating entities, with NPPOs being responsible for identifying the pest risk, setting the acceptable level of pest risk for specified pests, designing the system, evaluating the effectiveness of the production practice and quality system components in reducing pest risk, and monitoring whether this effectiveness is being maintained throughout the entire seed supply chain.</del>		This first sentence has already been included in paragraph [32], so suggesting to remove it. The second part of the paragraph is not necessary in a Scope section, also because is adding concepts that NPPOs know very well when carrying out the PRA, including the fact that the SA is a risk management measure
33	Systems approaches may include, in addition to commonly used phytosanitary measures, components of the existing production practices and quality systems used by participating entities, as far as they relate to pest <del>management</del> <u>management and are under the supervision of the NPPO</u> . These components <del>can be effective at</del> <u>may effectively contribute to</u> reducing pest risk to a level that is sufficient to meet phytosanitary import requirements as evaluated by NPPOs. When such components are used in a systems approach, NPPOs should <del>collaborate closely</del> <u>consult</u> with the participating entities, <del>with</del> <u>NPPOs being are</u> responsible for identifying the pest <del>risk</del> <u>risks</u> , setting the acceptable level of pest risk for specified pests, designing the system, evaluating the effectiveness of the production-practice and quality-system components in reducing pest risk, and monitoring whether this effectiveness is being maintained throughout the entire seed supply chain. <u>The NPPO of the importing country ultimately decides whether the systems approach is suitable in meeting its phytosanitary import requirements.</u>	P	<i>Category : SUBSTANTIVE</i> <b>(604) European Union (28 Sep 2024 2:01 AM)</b> 1) Added 'and are under the supervision of the NPPO' as this is a prerequisite is that it is under supervision of the NPPO.  2) 'may effectively contribute' consistency with paragraph 41: "helping to meet".  3) Very long and unclear sentence. We propose replacing "collaborate closely" with "consult" to be more in line with ISPM 14 and recommend splitting the sentence.  4) Risks (plural) because of "setting the acceptable level of pest risk for specified pests".  5) Added "The NPPO of the importing country ultimately decides whether the systems approach is suitable in meeting its phytosanitary import requirements.", to reinforce the NPPO responsibility here. It also aligns to ISPM 14.
33	Systems approaches may include, in addition to commonly used phytosanitary measures, components of the existing production practices and quality systems used by participating entities, as far as they relate to pest management. These components can be effective at reducing pest risk to a level that is sufficient to meet phytosanitary import requirements as evaluated by NPPOs. When such components are used in a systems approach, NPPOs should collaborate closely with the participating entities, with NPPOs being responsible for identifying the pest risk, setting the acceptable level of pest risk for specified pests, designing the system, evaluating the effectiveness of the production-practice and quality-system components in reducing pest risk, and monitoring whether this effectiveness is	P	<i>Category : SUBSTANTIVE</i> <b>(557) Canada (26 Sep 2024 8:01 PM)</b> Is it realistic to expect that NPPOs would be able to able to monitor the entire seed supply chain as defined below in the text considering the complexity associated with the seed production and movement?

	being <del>maintained throughout the entire seed supply chain</del> maintained.		
33	Systems approaches may include, in addition to commonly used phytosanitary measures, components of the existing production practices and quality systems used by participating entities, as far as they relate to pest management. These components can be effective at reducing pest risk to a level that is sufficient to meet phytosanitary import requirements as evaluated by NPPOs. <del>When such components are used in a systems approach, NPPOs should collaborate closely with the participating entities, with NPPOs being responsible for identifying the pest risk, setting the acceptable level of pest risk for specified pests, designing the system, evaluating the effectiveness of the production practice and quality system components in reducing pest risk, and monitoring whether this effectiveness is being maintained throughout the entire seed supply chain.</del>	P	Category : EDITORIAL <b>(515) Japan (20 Sep 2024 11:05 AM)</b> This part should be mentioned in section 8.1
33	Systems approaches may include, in addition to commonly used phytosanitary measures, components of the existing production practices and quality systems used by participating entities, as far as they relate to pest management. These components can be effective at reducing pest risk to a level that is sufficient to meet phytosanitary import requirements as <del>evaluated-determined</del> by NPPOs. When such components are used in a systems approach, NPPOs should collaborate closely with the participating entities, with NPPOs being responsible for identifying the pest risk, setting the acceptable level of pest risk for specified pests, designing the system, evaluating the effectiveness of the production-practice and quality-system components in reducing pest risk, and monitoring whether this effectiveness is being maintained throughout the entire seed supply chain.	P	Category : EDITORIAL <b>(533) Canada (20 Sep 2024 9:43 PM)</b>
33	Systems approaches may include, in addition to commonly used phytosanitary measures, components of the existing production practices and quality systems used by participating entities, as far as they relate to pest management. These components <del>can-be-are</del> effective at reducing pest risk to a level that is sufficient to meet phytosanitary import requirements as evaluated by NPPOs. When such components are used in a systems approach, NPPOs should collaborate closely with the participating entities, with NPPOs being responsible for identifying the pest risk, setting the acceptable level of pest risk for specified pests, designing the system, evaluating the effectiveness of the production-practice and quality-system components in reducing pest risk, and monitoring whether this effectiveness is being maintained throughout the entire seed supply chain.	P	Category : EDITORIAL <b>(514) Japan (20 Sep 2024 11:03 AM)</b>

33	Systems approaches may include, in addition to commonly used phytosanitary measures, <del>components of</del> the existing production practices and quality systems used by participating entities, <del>as far as they</del> relate to pest management. <del>These Integrated together, these</del> components <del>can be effective at reducing</del> reduce pest risk to a level that <del>is</del> NPPOs may accept as sufficient to meet phytosanitary import requirements as evaluated by NPPO requirements. <del>When such components</del> NPPOs are <del>used</del> ultimately responsible to identify pest risks associated with the imported seeds and to approve the systems approach in <del>a</del> relation to mitigating pest risks. <del>However, since existing industry practices and quality systems may form part of an approved systems approach, NPPOs may need to collaborate with participating entities to design the systems approach and to verify that the approved measures are effectively applied throughout the seed production and shipping process. systems approach, NPPOs should collaborate closely with the participating entities, with NPPOs being responsible for identifying the pest risk, setting the acceptable level of pest risk for specified pests, designing the system, evaluating the effectiveness of the production practice and quality system components in reducing pest risk, and monitoring whether this effectiveness is being maintained throughout the entire seed supply chain.</del>	P	<p>Category : <i>TECHNICAL</i></p> <p><b>(474) United States of America (17 Sep 2024 5:09 PM)</b></p> <p>Because NPPOs have limited knowledge of industry QM practices and systems, these resulting systems approaches need to be developed jointly with the industry in partnership, recognizing that the NPPOs have the ultimate authority</p>
33	Systems approaches may include, in addition to commonly used phytosanitary measures, components of the existing production practices and quality systems used by participating entities, as far as they relate to pest <del>management</del> <b>management and are under the supervision of the NPPO</b> . These components <del>can be effective at</del> <b>may effectively contribute to</b> reducing pest risk to a level that is sufficient to meet phytosanitary import requirements as evaluated by NPPOs. When such components are used in a systems approach, NPPOs should <del>collaborate closely</del> <b>consult</b> with the participating entities, <del>with</del> NPPOs <del>being are</del> responsible for identifying the pest <del>risk</del> <b>risks</b> , setting the acceptable level of pest risk for specified pests, designing the system, evaluating the effectiveness of the production-practice and quality-system components in reducing pest risk, and monitoring whether this effectiveness is being maintained throughout the entire seed supply chain. <del>The NPPO of the importing country ultimately decides whether the systems approach is suitable in meeting its phytosanitary import requirements</del>	P	<p>Category : <i>SUBSTANTIVE</i></p> <p><b>(387) EPPO (15 Sep 2024 5:49 PM)</b></p> <p>1) Added 'and are under the supervision of the NPPO' as this is a prerequisite is that it is under supervision of the NPPO.</p> <p>2) 'may effectively contribute' consistency with paragraph 41: "helping to meet".</p> <p>3) Very long and unclear sentence. We propose replacing "collaborate closely" with "consult" to be more in line with ISPM 14 and recommend splitting the sentence.</p> <p>4) Risks (plural) because of "setting the acceptable level of pest risk for specified pests".</p> <p>5) Added "The NPPO of the importing country ultimately decides whether the systems approach is suitable in meeting its phytosanitary import requirements.", to reinforce the NPPO responsibility here. It also aligns to ISPM 14.</p>
33	Systems approaches may include, in addition to commonly used phytosanitary measures, components of the existing production practices and quality systems	P	<p>Category : <i>SUBSTANTIVE</i></p> <p><b>(348) New Zealand (11 Sep 2024 12:32 AM)</b></p> <p>To emphasize that all components of a systems approach should be evaluated</p>

	used by participating entities, as far as they relate to pest management. These components can be effective at reducing pest risk to a level that is sufficient to meet phytosanitary import requirements as evaluated by NPPOs. When such components are used in a systems approach, NPPOs should collaborate closely with the participating entities, with NPPOs being responsible for identifying the pest risk, setting the acceptable level of pest risk for specified pests, designing the system, evaluating the effectiveness of the <u>measures and</u> production-practice and quality-system components in reducing pest risk, and monitoring whether this effectiveness is being maintained throughout the entire seed supply chain.		for effectiveness.
33	<del>Systems approaches may include, in addition to commonly used phytosanitary measures, components of the existing production-relevant industry best-management practices and quality systems used by participating entities, could serve as far the basis for designing systems approaches as they relate to pest management an alternative option for the phytosanitary certification of seeds.</del> These components can be effective at reducing pest risk to a level that is sufficient to meet phytosanitary import requirements as evaluated by NPPOs. When such components are used in a systems approach, NPPOs should collaborate closely with the participating entities, with NPPOs being responsible for identifying the pest risk, setting the acceptable level of pest risk for specified pests, designing the system, evaluating the effectiveness of the production-practice and quality-system components in reducing pest risk, and monitoring whether this effectiveness is being maintained throughout the entire seed supply chain.	P	<i>Category : SUBSTANTIVE</i> <b>(347) New Zealand (11 Sep 2024 12:30 AM)</b> Suggest rewording of the sentence to emphasize that relevant industry practises are only one component that can be considered as the basis for phytosanitary measures.
33	Systems approaches may include, in addition to commonly used phytosanitary measures, components of the existing production practices and quality systems used by participating entities, as far as they relate to pest management. These components can be effective at reducing pest risk to a level that is sufficient to meet phytosanitary import requirements as evaluated by NPPOs. When such components are used in a systems approach, NPPOs should collaborate closely with the participating entities, with NPPOs being responsible for identifying the pest risk, setting the acceptable level of pest risk for specified <del>pests</del> <u>pests for specific commodities</u> , designing the system, evaluating the effectiveness of the production-practice and quality-system components in reducing pest risk, and monitoring whether this effectiveness is being maintained throughout the entire seed supply chain.	P	<i>Category : TECHNICAL</i> <b>(273) Sri Lanka (22 Aug 2024 8:58 AM)</b> Suggest to add the specific commodities (generally the commodity should be pest free)

33	Systems approaches may include, in addition to commonly used phytosanitary measures, components of the existing production practices and <b>quality systems</b> used by participating entities, as far as they relate to pest management. These components can be effective at reducing pest risk to a level that is sufficient to meet phytosanitary import requirements as evaluated by NPPOs. When such components are used in a systems approach, NPPOs should collaborate closely with the participating entities, with NPPOs being responsible for identifying the pest risk, setting the acceptable level of pest risk for specified pests, designing the system, evaluating the effectiveness of the production-practice and quality-system components in reducing pest risk, and monitoring whether this effectiveness is being maintained throughout the entire seed supply chain.	C	<i>Category : SUBSTANTIVE</i> <b>(252) South Africa (20 Aug 2024 12:24 PM)</b> Suggest inclusion of seed quality as a terminology in this annex to provide more clarity.
33	Systems approaches may include, in addition to commonly used phytosanitary measures, components of the existing production practices and <b>quality systems</b> used by participating entities, as far as they relate to pest management. These components can be effective at reducing pest risk to a level that is sufficient to meet phytosanitary import requirements as evaluated by NPPOs. When such components are used in a systems approach, NPPOs should collaborate closely with the participating entities, with NPPOs being responsible for identifying the pest risk, setting the acceptable level of pest risk for specified pests, designing the system, evaluating the effectiveness of the production-practice and quality-system components in reducing pest risk, and monitoring whether this effectiveness is being maintained throughout the entire seed supply chain.	C	<i>Category : EDITORIAL</i> <b>(251) South Africa (20 Aug 2024 12:23 PM)</b> It is requested that quality systems be defined in line with this draft ISPM.
33	<del>Systems approaches may include, in addition to commonly used phytosanitary measures, components of the existing production practices and quality systems used by participating entities, as far as they relate to pest management. These components can be effective at reducing pest risk to a level that is sufficient to meet phytosanitary import requirements as evaluated by NPPOs. When such components are used in a Systems approaches may include components of the existing seed production practices and quality systems used by participating entities, as far as they relate to pest management. These components can be effective at reducing pest risk to meet phytosanitary import requirements. When such components are integrated in a systems approach, NPPOs should collaborate closely with the participating entities, with NPPOs being are responsible for identifying-assessing the pest risk, setting the acceptable level of pest risk for specified pests</del> <u>phytosanitary import requirements</u> , designing the system, evaluating	P	<i>Category : TECHNICAL</i> <b>(173) COSAVE (19 Aug 2024 12:18 AM)</b> 1) Systems approach is an option that integrates at least two independent measures and as a system meets phytosanitary import requirements. Measures commonly used is confusing as it may be interpreted as phytosanitary measures used as stand alone measures, 2) Sufficient is redundant if it meets it is sufficient., 3) A systems approach is an alternative phytosanitary measure, first evaluated by the NPPO. The selection of the measures in the systems approach should be agreed between NPPOs of importing and exporting countries, entities involved in a SA should collaborate closely with NPPOs and not the other way round.

	the effectiveness of the production-practice and quality-system components in reducing pest risk, and monitoring whether this effectiveness is being maintained throughout the entire seed supply chain.		
34	In this annex, the following terminology is used:	C	<p>Category : <i>TECHNICAL</i>  <b>(605) European Union (28 Sep 2024 2:07 AM)</b>  Missing:</p> <ul style="list-style-type: none"> <li>critical control point and</li> <li>system manual.</li> </ul>
34	In this annex, the following terminology is used:	C	<p>Category : <i>TECHNICAL</i>  <b>(388) EPPO (15 Sep 2024 5:49 PM)</b>  Missing:</p> <ul style="list-style-type: none"> <li>critical control point and</li> <li>system manual.</li> </ul>
35	<del>“entities”</del> <u>“participating entities”</u> refers to any parties, other than NPPOs, involved in the <del>seed supply chain</del> <u>systems approach</u> , such as seed producers and <del>companies performing treatments</del> <u>treatment providers</u> ;	P	<p>Category : <i>SUBSTANTIVE</i>  <b>(606) European Union (28 Sep 2024 2:09 AM)</b></p>
35	<del>“entities”</del> <u>“participating entities”</u> refers to any parties, other than NPPOs, involved in the <del>seed supply chain</del> <u>systems approach</u> , such as seed producers and <del>companies performing treatments</del> <u>treatment providers</u> ;	P	<p>Category : <i>SUBSTANTIVE</i>  <b>(389) EPPO (15 Sep 2024 5:49 PM)</b>  To keep coherency with the terminology used throughout the text.</p> <p>It should be checked throughout the text whether ‘entities’ should be replaced by ‘participating entities’.</p>
36	“seed supply chain” encompasses all steps related to seed production and movement (i.e. from pre-planting processes and procedures in the country of origin, through all subsequent processes and procedures taking place in different countries, as <del>appropriate</del> <u>appropriate to the country of destination</u> ;	P	<p>Category : <i>SUBSTANTIVE</i>  <b>(622) Mexico (28 Sep 2024 10:20 PM)</b>  This (“seed supply chain”) is the only term that is new, the others: “entitites”, “exporting country” and “importing country” are already defined in ISPM 45, 12 or 5.</p>
36	“seed supply chain” encompasses all steps related to seed production <del>and movement</del> (i.e. from pre-planting <del>processes</del> <u>processes, pre-harvesting, harvesting, post-harvest handling</u> and procedures <del>taking place</del> in the <del>country</del> <u>countries</u> of <del>origin, through all subsequent processes</del> <u>origin</u> and <del>procedures taking place</del> (re-) <del>export until import</del> in <del>different countries, as appropriate</del> <u>the country of final destination</u> );	P	<p>Category : <i>EDITORIAL</i>  <b>(607) European Union (28 Sep 2024 2:16 AM)</b>  Proposed improvements.</p>
36	“seed supply chain” encompasses all steps related to seed production <del>and movement</del> (i.e. from pre-planting <del>processes</del> <u>processes, pre-harvest, harvesting</u> and <del>post-harvest handling</del> and procedures <del>taking place</del> in the <del>country</del> <u>countries</u> of <del>origin, through all subsequent processes</del> <u>origin</u> and <del>procedures taking place</del> (re-) <del>export until import</del> in <del>different countries, as appropriate</del> <u>the country of final destination</u> );	P	<p>Category : <i>EDITORIAL</i>  <b>(390) EPPO (15 Sep 2024 5:49 PM)</b>  Proposed improvements.</p>

36	<del>“seed supply chain” encompasses all steps related to seed production and movement (i.e. from pre-planting processes and procedures in the country of origin processes, through all subsequent processes pre-harvesting, harvesting and procedures post-harvest handling taking place in different countries the countries of origin and re-export, as appropriate); until the seed reaches its final destination where it is planted.</del>	P	Category : <i>SUBSTANTIVE</i> <b>(349) New Zealand (11 Sep 2024 12:36 AM)</b> Suggest rewording to align with terminology in ISPM 38 section 1.5.
37	<del>“exporting country” refers to the country of origin and any countries of re-export; and</del>	P	Category : <i>TECHNICAL</i> <b>(608) European Union (28 Sep 2024 2:17 AM)</b> We propose deleting this term as it is clear in the IPPC context and adding it creates more confusion than added value.
37	<del>“exporting country” refers to the country of origin and any countries of re-export; and</del>	P	Category : <i>TECHNICAL</i> <b>(391) EPPO (15 Sep 2024 5:49 PM)</b> We propose deleting this term as it is clear in the IPPC context and adding it creates more confusion than added value.
37	“exporting country” refers to the country of <del>origin</del> <u>origin</u> ; - 're-exporting country' refers to the country where seeds are imported and any countries of re-export are exported. Consignments for re-export may be stored, split up or combined with other consignments or have packaging changed; and	P	Category : <i>SUBSTANTIVE</i> <b>(350) New Zealand (11 Sep 2024 12:51 AM)</b> Suggest removing 're-export' from para 38 and creating a new bullet to highlight the importance of re-export for seed. Wording proposed aligns with the ISPM 5 definition of a re-exported consignment.
37	<del>“exporting country” refers to the country of origin and any countries of re-export; and</del>	P	Category : <i>TECHNICAL</i> <b>(174) COSAVE (19 Aug 2024 12:22 AM)</b> This definition is confusing, as a re-export country is not an exporting country in the phytosanitary context.
38	<del>“importing country” refers to any countries of re-export and the final destination country.</del>	P	Category : <i>TECHNICAL</i> <b>(609) European Union (28 Sep 2024 2:18 AM)</b> We propose deleting also this term as it is clear in the IPPC context and adding it creates more confusion than added value.
38	“importing country” refers to any countries <del>of re-export and the final destination</del> <u>receiving a seed shipment from an exporting country</u> .	P	Category : <i>TECHNICAL</i> <b>(475) United States of America (17 Sep 2024 5:29 PM)</b> Since exporting country is defined above to include country of re-export, it seems unnecessary to include clarification about intention to re-export vs. final destination
38	<del>“importing country” refers to any countries of re-export and the final destination country.</del>	P	Category : <i>TECHNICAL</i> <b>(392) EPPO (15 Sep 2024 5:49 PM)</b> We propose deleting also this term as it is clear in the IPPC context and adding it creates more confusion than added value.
38	“importing country” refers to any countries <u>importing with the intention</u> of re-export and the final destination country.	P	Category : <i>TECHNICAL</i> <b>(384) United States of America (12 Sep 2024 4:42 PM)</b> clarification
38	<del>“importing country” refers to any countries of re-export and the final destination country.</del>	P	Category : <i>TECHNICAL</i> <b>(175) COSAVE (19 Aug 2024 12:23 AM)</b> This definition is confusing, as a re-export country is not an importing country in the phytosanitary context.

39	<b>1.1 Scope</b>	P	Category : TECHNICAL <b>(176) COSAVE (19 Aug 2024 12:24 AM)</b> Moved at the beginning of the section
40	<del>This annex applies to any seeds being moved internationally for any purpose. It describes the essential elements of a systems approach for seeds, which may include measures and practices already used by entities. The resulting systems approach may be evaluated and approved by NPPOs as a way to meet phytosanitary import requirements and, therefore, as a basis for phytosanitary certification.</del>	P	Category : SUBSTANTIVE <b>(623) Mexico (28 Sep 2024 10:22 PM)</b> The title Scope was [39] moved up right below Introduction.
40	This annex applies to any seeds being moved internationally <u>along the seed supply chain</u> for any purpose. It describes the essential elements of a systems approach (see ISPM 14) for seeds, <del>which may include measures and practices already used by entities. The resulting A</del> systems approach <u>may should</u> be evaluated <u>and and, if acceptable,</u> approved by NPPOs as a way to meet phytosanitary import requirements and, therefore, as <u>a basis an option</u> for phytosanitary certification.	P	Category : SUBSTANTIVE <b>(610) European Union (28 Sep 2024 2:22 AM)</b> 1) Addition of 'along the seed supply chain' for clarification on the difference between the core text of ISPM 38 (see next paragraph) and this annex.  2) Deletion of some words as redundant (repetition of paragraph 41)  2) 'an optoin' is a ore appropriate wording (see first sentence of paragraph 32 and related comment on paragraph 32).
40	This annex <del>applies may be applied</del> to any seeds being moved internationally for any purpose. It describes the essential elements of a systems approach for seeds, which may include measures and practices already used by entities. The resulting systems approach may be evaluated and approved by NPPOs as a way to meet phytosanitary import requirements and, therefore, as a basis for phytosanitary certification.	P	Category : TECHNICAL <b>(558) Canada (26 Sep 2024 8:10 PM)</b> Development of a seeds SA may be challenging for certain types of seeds that contain a mixture of species e.g mixed flower seeds that may have a complex risk profile. Consider narrowing the scope of the Annex to facilitates its implementation by NPPOs. Suggest edits have been provided to soften the scope
40	This annex applies to any seeds being moved internationally <u>along the seed supply chain</u> for any purpose. It describes the essential elements of a systems <del>approach</del> <u>approach (see ISPM14)</u> for seeds, <del>which may include measures and practices already used by entities. The resulting A</del> systems approach <u>may should</u> be evaluated <u>and and, if acceptable,</u> approved by NPPOs as a way to meet phytosanitary import requirements and, therefore, as <u>a basis an option</u> for phytosanitary certification.	P	Category : SUBSTANTIVE <b>(393) EPPO (15 Sep 2024 5:49 PM)</b> 1) Addition of 'along the seed supply chain' for clarification on the difference between the core text of ISPM 38 (see next paragraph) and this annex.  2) Deletion of some words as redundant (repetition of paragraph 41)  2) 'an optoin' is a ore appropriate wording (see first sentence of paragraph 32 and related comment on paragraph 32).
40	This annex applies to any seeds being moved internationally for any purpose. It describes the essential elements of a systems approach for seeds, which may include measures and practices already used by entities. The resulting systems approach may be evaluated and approved by <u>one or more</u> NPPOs as a way to meet phytosanitary import requirements and, therefore, as a basis for phytosanitary certification.	P	Category : TECHNICAL <b>(351) New Zealand (11 Sep 2024 1:00 AM)</b> Proposed additional text to capture the concept of multilateral agreements for seed systems approaches that this framework is about.

40	This annex applies to any seeds being <del>moved-transported</del> internationally for any purpose. It describes the essential elements of a systems approach for seeds, which may include measures and practices already used by entities. The resulting systems approach may be evaluated and approved by NPPOs as a way to meet phytosanitary import requirements and, therefore, as a basis for phytosanitary certification.	P	Category : EDITORIAL <b>(341) Philippines (3 Sep 2024 5:23 AM)</b>
40	This annex applies to any seeds being moved internationally for any purpose. It describes the essential elements of a systems approach for seeds, which may include measures and practices already used by entities. The resulting systems approach may be evaluated and approved by NPPOs as a way to meet phytosanitary import requirements and, therefore, as a basis for phytosanitary certification.	C	Category : EDITORIAL <b>(338) Indonesia (1 Sep 2024 8:22 AM)</b> Add " ... (including seeds for sale, production, trialling, or breeding)" in first sentence.  to make it clear that the annex covered all these purposes.
40	This annex applies to any seeds being moved <del>internationally for international</del> <del>vor any purpose</del> <del>purpos fe</del> . It describes the essential elements of a systems approach for seeds, which may include measures and practices already used by entities. The resulting systems approach may be evaluated and approved by NPPOs as a way to meet phytosanitary import requirements and, therefore, as a basis for phytosanitary certification.	P	Category : EDITORIAL <b>(254) South Africa (20 Aug 2024 12:30 PM)</b> Suggest deletion of : For any purpose"
40	<del>(as a commodity)</del> This annex applies to any seeds being moved internationally for any purpose. It describes the essential elements of a systems approach for seeds, which may include measures and practices already used by entities. The resulting systems approach may be evaluated and approved by NPPOs as a way to meet phytosanitary import requirements and, therefore, as a basis for phytosanitary certification.	P	Category : SUBSTANTIVE <b>(253) South Africa (20 Aug 2024 12:29 PM)</b> Suggest that seeds as a commodity be included so that an alignment is made with the scope of ISPM 38
40	<del>This annex applies to any seeds being moved internationally for any purpose. It describes the essential elements of a systems approach for seeds, which may include measures and practices already used by entities. The resulting systems approach may be evaluated and approved by NPPOs as a way to meet phytosanitary import requirements and, therefore, as a basis for phytosanitary certification.</del>	P	Category : TECHNICAL <b>(177) COSAVE (19 Aug 2024 12:25 AM)</b> Deleted to avoid redundancy with proposed paragraph 32
41	According to the core text of this standard, many pest management practices used in seed production may be integrated in a systems approach to reduce pest risk throughout the seed production process, from planting to harvesting, <u>postharvest handling and shipping</u> , helping to meet phytosanitary import requirements.	P	Category : SUBSTANTIVE <b>(776) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b>

41	<del>According to the core text of this standard, many pest management practices used in seed production may be integrated in a systems approach to reduce pest risk throughout the seed production process, from planting to harvesting, helping to meet phytosanitary import requirements.</del>	P	Category : <i>SUBSTANTIVE</i> <b>(625) Mexico (28 Sep 2024 10:27 PM)</b> This is already stated in ISPM38, it is unnecessary to repeat it in the Annex.
41	<del>According to the core text of this standard, many pest</del> Pest management practices used in seed production may be integrated in a systems approach to reduce pest risk throughout the seed production process, from planting to harvesting, helping to meet phytosanitary import requirements.	P	Category : <i>EDITORIAL</i> <b>(611) European Union (28 Sep 2024 2:23 AM)</b> Unnecessary words.
41	According to the core text of this standard, many pest management practices used in seed production may be integrated in a systems approach to reduce pest risk throughout the seed production process, from planting to <del>harvesting, helping</del> <u>harvesting and</u> to meet phytosanitary import requirements.	P	Category : <i>TECHNICAL</i> <b>(476) United States of America (17 Sep 2024 7:17 PM)</b> reduced text for a clear flow
41	<del>According to the core text of this standard, many pest</del> Pest management practices used in seed production may be integrated in a systems approach to reduce pest risk throughout the seed production process, from planting to harvesting, helping to meet phytosanitary import requirements.	P	Category : <i>EDITORIAL</i> <b>(394) EPPO (15 Sep 2024 5:49 PM)</b> Unnecessary words.
41	According to the core text of this standard, many pest management practices used in seed production may be integrated in a systems approach to reduce pest risk throughout the seed production process, from planting to <del>harvesting</del> <u>import into the country of final destination</u> , helping to meet phytosanitary import requirements.	P	Category : <i>SUBSTANTIVE</i> <b>(352) New Zealand (11 Sep 2024 1:03 AM)</b> Additional wording to align with changes proposed in paragraphs 36 and 38.
41	According to the core text of this standard, many pest management practices used in seed production may be integrated in a systems approach to reduce pest risk throughout the seed production process, from planting to <del>harvesting</del> <u>harvesting and post harvest handling /storage</u> , helping to meet phytosanitary import requirements.	P	Category : <i>TECHNICAL</i> <b>(274) Sri Lanka (22 Aug 2024 9:13 AM)</b> Suggest to include the seed production process until post harvest /storage because most of the seeds are stored prior to export
41	<del>According to the core text of this standard, many pest management practices used in seed production may be integrated in a systems approach to reduce pest risk throughout the seed production process, from planting to harvesting, helping to meet phytosanitary import requirements.</del>	P	Category : <i>TECHNICAL</i> <b>(178) COSAVE (19 Aug 2024 12:26 AM)</b> To avoid redundancy with core text. It is not needed to repeat core text in the annex
42	The pest risk management options described in this annex may apply to individual or groups of pests and should be considered sufficient to meet the phytosanitary import requirements of importing countries when integrated into a systems approach. This approach is consistent with the concepts and approaches described in ISPM 36 ( <i>Integrated measures for plants for planting</i> ), which does not cover seeds. If the NPPO of the importing country has indications that measures	P	Category : <i>SUBSTANTIVE</i> <b>(813) Australia (30 Sep 2024 7:56 PM)</b> All countries along the seed supply chain should be included.

	comprising the system approach do not properly address the pest risk posed by a particular regulated pest and therefore do not meet their phytosanitary import requirements, additional measures should be discussed with the NPPO of the <del>country of origin</del> <u>country/ies along the seed supply chain</u> .		
42	The pest risk management options described in this annex may apply to individual or groups of pests and should be considered sufficient to meet the phytosanitary import requirements of importing countries when integrated into a systems approach. <u>This approach is consistent with the concepts and approaches described in ISPM 36 (<i>Integrated measures for plants for planting</i>)</u> , which does not cover seeds. If the NPPO of the importing country has indications that measures comprising the system approach do not properly address the pest risk posed by a particular regulated pest and therefore do not meet their phytosanitary import requirements, additional measures should be discussed with the NPPO of the country of origin.	C	<p>Category : SUBSTANTIVE  <b>(777) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b>          Consider if this is the correct ISPM to reference here and not ISPM 14</p>
42	The pest risk management options described in this annex may apply to individual or groups of pests and should be considered sufficient to meet the phytosanitary import requirements of importing countries when integrated into a systems approach. This approach is consistent with the concepts and approaches described in ISPM 36 ( <i>Integrated measures for plants for planting</i> ), which does not cover seeds. <del>If the NPPO of the importing country has indications that measures comprising the system approach do not properly address the pest risk posed by a particular regulated pest and therefore do not meet their phytosanitary import requirements, additional measures should be discussed with the NPPO of the country of origin.</del>	P	<p>Category : SUBSTANTIVE  <b>(627) Mexico (28 Sep 2024 10:32 PM)</b>          The NPPO of the importing country will consider the Systems Approach proposal from the NPPO of the exporting country(ies). During such deliberations/exchanges, other measures can be suggested and agreed.</p>
42	The pest risk management options described in this annex may apply to individual or groups of pests and <del>should</del> <u>may</u> be considered sufficient to meet the phytosanitary import requirements of importing countries when integrated into a systems approach. <del>This approach is consistent with the concepts and approaches described in ISPM 36 (<i>Integrated measures for plants for planting</i>), which does not cover seeds.</del> If the NPPO of the importing country has indications that measures comprising the system approach do not properly address the pest risk posed by a particular regulated pest and therefore do not meet their phytosanitary import requirements, additional measures should be discussed with the NPPO of the country of origin.	P	<p>Category : SUBSTANTIVE  <b>(626) Mexico (28 Sep 2024 10:31 PM)</b>          It is not necessary/appropriate to refer to ISPM36, since it is not about Systems Approach. ISPM36 refers to integrated measures and, when it comes to pest groups, the topic appears only in an appendix, which contributes only to what NPPOs handle based on the biology and epidemiology of the considered regulated pests.</p>

42	<p>The pest risk management options described in this annex may apply to individual <u>pests</u> or <u>clearly defined pest</u> groups <del>of pests</del> and should be considered sufficient to meet the phytosanitary import requirements <del>of importing countries</del> when integrated into a systems approach. This approach is consistent with the concepts and approaches described in ISPM <del>36-14</del> (<del>Integrated</del> <u>The use of integrated measures for plants for planting</u> <del>planting in a systems approach for pest risk management</del>), which does not cover seeds. <del>If</del></p> <p><u>This annex describes the NPPO of the importing country has indications that measures comprising the system approach do not properly address the pest risk posed by a particular regulated pest role and therefore do not meet their phytosanitary import requirements, additional measures should be discussed with the NPPO responsibilities of the country of origin. NPPOs in a systems approach for seeds.</u></p>	P	<p><i>Category : TECHNICAL</i>  <b>(612) European Union (28 Sep 2024 2:30 AM)</b>  1) "individual pests or clearly defined pest groups" is clearer. See paragraphs 58 and 65.  2) Improved clarity and precision (deletion of importing countries)  3) Replaced reference to ISPM 36 with ISPM 14 as seeds are excluded from ISPM 36 (see scope).  4) Deletion of last sentence as it doesn't fit with the scope of the standard and insinuates that an NPPO should go with the systems approach and improve it rather than deny a systems approach and require single measures  5) Added in the end the sentence moved from introduction – deleting the part 'and, if applicable, the role and responsibilities of participating entities' as we propose to delete these elements from section 3 (see comment on para 97).</p>
42	<p>The pest risk management options described in this annex may apply to individual or groups of pests and should be considered sufficient to meet the phytosanitary import requirements of importing countries when integrated into a systems approach. This approach is consistent with the concepts and approaches described in ISPM 36 (<i>Integrated measures for plants for planting</i>), which does not cover seeds. If the NPPO of the importing country has indications that measures comprising the system approach do not properly address the pest risk posed by a particular regulated pest and therefore do not meet their phytosanitary import requirements, additional measures should be discussed with the NPPO of the country of <del>origin</del> <u>export</u>.</p>	P	<p><i>Category : TECHNICAL</i>  <b>(560) Canada (26 Sep 2024 8:43 PM)</b>  Given that the country of export includes the country of origin and the country(ies) of re-export, it is more appropriate to indicate the country of export rather than the country of origin</p>
42	<p>The pest risk management options described in this annex may apply to individual or groups of pests and <del>should may</del> be considered <u>sufficient equivalent</u> to <del>meet the phytosanitary import requirements of importing countries</del> <u>single measures</u> when integrated into a systems approach. This approach is consistent with the concepts and approaches described in ISPM 36 (<i>Integrated measures for plants for planting</i>), which does not cover seeds. If the NPPO of the importing country has indications that measures comprising the system approach do not properly address the pest risk posed by a particular regulated pest and therefore do not meet their phytosanitary import requirements, additional measures should be discussed with the NPPO of the country of origin.</p>	P	<p><i>Category : SUBSTANTIVE</i>  <b>(559) Canada (26 Sep 2024 8:30 PM)</b>  NPPOs have the sovereign right to determine their appropriate level of protection and determine if a proposed SA is equivalent to a single measure</p>
42	<p>The pest risk management options described in this annex may apply to individual</p>	P	<p><i>Category : TECHNICAL</i>  <b>(547) Japan (26 Sep 2024 6:08 AM)</b></p>

	<p>or groups of pests and should be considered sufficient to meet the phytosanitary import requirements of importing countries when integrated into a systems approach. This approach is consistent with the concepts and approaches described in ISPM 36 (<i>Integrated measures for plants for planting</i>), which does not cover seeds. <u>Production practices used by participating entities may be included as measures in systems approaches if those practices are recognized by participating NPPOs as effectively managing pest risk. Such measures, in combination with the participating entities' quality systems (including audit and other requirements as outlined in this annex), should be considered as meeting the phytosanitary import requirements of the importing countries.</u> If the NPPO of the importing country has indications that measures comprising the system approach do not properly address the pest risk posed by a particular regulated pest and therefore do not meet their phytosanitary import requirements, additional measures should be discussed with the NPPO of the country of origin.</p>	<p>Insert paragraph 57 into this paragraph. This information should be included in the scope.</p>
42	<p>The pest risk management options described in this annex may apply to individual <u>pests</u> or <u>clearly defined pest</u> groups <del>of pests</del> and should be considered sufficient to meet the phytosanitary import requirements <del>of importing countries</del> when integrated into a systems approach. This approach is consistent with the concepts and approaches described in ISPM <del>36</del> <u>14 (The use of integrated measures for plants for planting in a systems approach for pest risk management)</u>. <del>Integrated measures for plants for planting</del>, which does not cover seeds. <del>If</del>.</p> <p><u>This annex describes the NPPO of the importing country has indications that measures comprising the system approach do not properly address the pest risk posed by a particular regulated pest role and therefore do not meet their phytosanitary import requirements, additional measures should be discussed with the NPPO responsibilities of the country of origin NPPOs in a systems approach for seeds.</u></p>	<p>P <i>Category : TECHNICAL</i>  <b>(395) EPPO (15 Sep 2024 5:49 PM)</b>  1) "individual pests or clearly defined pest groups" is clearer. See paragraphs 58 and 65.  2) Improved clarity and precision (deletion of importing countries)  3) Replaced reference to ISPM 36 with ISPM 14 as seeds are excluded from ISPM 36 (see scope).  4) Deletion of last sentence as it doesn't fit with the scope of the standard and insinuates that an NPPO should go with the systems approach and improve it rather than deny a systems approach and require single measures  5) Added in the end the sentence moved from introduction – deleting the part 'and, if applicable, the role and responsibilities of participating entities' as we propose to delete these elements from section 3 (see comment on para 97).</p>
42	<p>The pest risk management options described in this annex may apply to individual or groups of pests and should be considered sufficient to meet the phytosanitary import requirements of importing countries when integrated into a systems approach. This approach is consistent with the concepts and approaches described in ISPM 36 (<i>Integrated measures for plants for planting</i>), which does not cover seeds. If the NPPO of the importing country has indications that measures</p>	<p>P <i>Category : TECHNICAL</i>  <b>(534) Canada (20 Sep 2024 9:46 PM)</b>  To use terminology consistent with paragraph 37 which defines exporting country as the country of origin or any countries that re-export</p>

	comprising the system approach do not properly address the pest risk posed by a particular regulated pest and therefore do not meet their phytosanitary import requirements, additional measures should be discussed with the NPPO of the <del>country of origin</del> <u>exporting country</u> .		
42	The pest risk management options described in this annex may apply to individual or groups of pests and <del>should when integrated into a systems approach may</del> be considered sufficient to meet the phytosanitary <del>import</del> requirements of importing <del>countries when integrated into a systems approach</del> <u>countries</u> . This approach is consistent with the concepts and approaches described in ISPM 36 ( <i>Integrated measures for plants for planting</i> ), which does not cover seeds. If the NPPO of the importing country <del>has indications determines</del> that measures comprising the <u>proposed</u> system approach do not <del>properly adequately</del> address the pest risk posed by a particular regulated <del>pest and therefore do not meet their phytosanitary import requirements</del> <u>pest</u> , additional <u>or modified</u> measures should be discussed with the <del>NPPO of the exporting country of origin</del> <u>NPPO</u> .	P	<i>Category : TECHNICAL</i> <b>(477) United States of America (17 Sep 2024 7:52 PM)</b> Technical clarity.
42	The pest risk management options described in this annex may apply to individual or groups of pests and should be considered sufficient to meet the phytosanitary import requirements of importing countries when integrated into a systems approach. This approach is consistent with the concepts and approaches described in ISPM 36 ( <i>Integrated measures for plants for planting</i> ), which does not cover seeds. If the NPPO of the importing country has indications that measures comprising the system approach do not properly address the pest risk posed by a particular regulated pest and therefore do not meet their phytosanitary import requirements, additional measures should be discussed with the NPPO of the country of <del>origin</del> <u>origin / exporting country</u> .	P	<i>Category : SUBSTANTIVE</i> <b>(247) Thailand (19 Aug 2024 6:41 AM)</b> We would like to seek more clarification in the case of failure to meet the phytosanitary import requirements. The NPPO of the importing country should only discuss with the NPPO of the country of origin or together with the NPPO of the exporting country where the definition above specified.
42	The <u>components related to</u> pest risk management <del>options</del> described in this annex may apply to individual or groups of pests and should be considered sufficient to meet the phytosanitary import requirements of importing countries when integrated into a systems approach. <del>This approach is consistent with the concepts and approaches described in ISPM 36 (Integrated measures for plants for planting), which does not cover seeds.</del> If the NPPO of the importing country has indications that measures comprising the system approach do not properly <u>address-manage</u> the pest risk <del>posed by a particular regulated pest</del> and therefore do not meet their phytosanitary import requirements, <del>additional the integration of other</del> measures	P	<i>Category : TECHNICAL</i> <b>(179) COSAVE (19 Aug 2024 12:34 AM)</b> For consistency there are the components related to pest risk management. Reference to ISPM 36 is unnecessary considering that it does not cover seeds. Last change for consistency and to clarify that measures to be discussed would be integrated in the SA  Paragraph 45 moved after paragraph 42 and modified. Although in ISPM 5 commodity includes movement with other purposes, within the seed industry, commodity is associated only to trade. Therefore we suggest to use seed species in this particular case. Seed-trade replaced by international movement of seeds for consistency with core text

	<p>should be discussed with the NPPO of the country of origin.</p> <p><u>This annex does not focus on any particular seed species but does address specific characteristics of the international movement of seeds, such as the potentially long periods over which seeds can be stored and delivered to many different customers in different countries</u></p>		
44	<p>The development of a systems approach is described in ISPM 14 (<i>The use of integrated measures in a systems approach for pest risk management</i>) as a bilateral process involving the NPPO of an importing country and the NPPO of an exporting country, which may also involve stakeholders from industry. The NPPOs of several countries may also develop together a systems approach for export from, and import into, their countries. If this leads to the same systems approach for these countries, this becomes a multilateral systems approach, which may suit the multinational character of the seed trade. The benefits of such a multilateral systems approach, which involves multiple exporting and importing countries, are likely to be greater when a larger number of countries participate in it, providing more predictability <del>for seed movement</del> <u>in pest risk management</u>.</p>	P	<p>Category : <i>SUBSTANTIVE</i></p> <p><b>(778) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b></p>
44	<p>The development of a systems approach is described in ISPM 14 (<i>The use of integrated measures in a systems approach for pest risk management</i>) as a bilateral process involving the NPPO of an importing country and the NPPO of an exporting country, which may also involve stakeholders from industry. The NPPOs of several countries may also develop together a systems approach for export from, and import into, their countries. If this leads to the same systems approach for these countries, this becomes a multilateral systems approach, which may suit the multinational character of the seed trade. The benefits of such a multilateral systems approach, which involves multiple exporting and importing countries, are likely to be greater when a larger number of countries participate in it, providing more predictability for <u>international</u> seed movement.</p>	P	<p>Category : <i>EDITORIAL</i></p> <p><b>(763) Korea, Republic of (30 Sep 2024 8:02 AM)</b></p> <p>To clarify the meaning of this standard.</p>
44	<p>The development of a systems approach is described in ISPM 14 (<i>The use of integrated measures in a systems approach for pest risk management</i>) as a bilateral process involving the NPPO of an importing country and the NPPO of an exporting country, which may also involve stakeholders from industry. The NPPOs of several countries may also develop together a systems approach for export from, and import into, their countries. If this leads to the same systems approach for these</p>	C	<p>Category : <i>SUBSTANTIVE</i></p> <p><b>(628) China (29 Sep 2024 5:10 AM)</b></p> <p>Move the content of the multilateral systems approaches to the Paragraph [105] "6. Multilateral systems approaches". From "The NPPOs of several countries may also... to ...suit the multinational character of the seed trade."</p>

	countries, this becomes a multilateral systems approach, which may suit the multinational character of the seed trade. The benefits of such a multilateral systems approach, which involves multiple exporting and importing countries, are likely to be greater when a larger number of countries participate in it, providing more predictability for seed movement.		
44	The development of a systems approach is described in ISPM 14 ( <i>The use of integrated measures in a systems approach for pest risk management</i> ) as a bilateral process involving the NPPO of an importing country and the NPPO of an exporting country, which may also <del>involve</del> <u>include consultation with</u> stakeholders from <u>the scientific community and</u> industry. The NPPOs of several countries may also develop <del>together</del> a <u>multilateral</u> systems approach for export from, and import into, their countries. <del>If this leads to the same</del> <u>The benefits of such a multilateral systems approach for these approach, which involves multiple exporting and importing countries, this becomes may be grater when a large number of countries participating in it. multilateral systems approach, which may suit the multinational character of the seed trade. The benefits of such a multilateral systems approach, which involves multiple exporting and importing countries, are likely to be greater when a larger number of countries participate in it, providing more predictability for seed movement.</u>	P	<p>Category : <i>TECHNICAL</i>  <b>(613) European Union (28 Sep 2024 2:39 AM)</b>  1) Addition of "include consultation with [stakeholders from] the scientific community and [industry]" to be more in line with ISPM 14.</p> <p>2) Removal of "If this leads to the same systems approach for these countries, this becomes a multilateral systems approach, which may suit the multinational character of the seed trade", and simply added multilateral to the preceding sentence – simpler wording.</p> <p>3) Replaced "are likely to" with "may" to provide more neutral wording.</p>
44	The development of a systems approach is described in ISPM 14 ( <i>The use of integrated measures in a systems approach for pest risk management</i> ) as a bilateral process involving the NPPO of an importing country and the NPPO of an exporting country, which may also involve stakeholders from industry. The NPPOs of several countries may also develop together a systems approach for export from, and import into, their countries. If this leads to the same systems approach for these countries, this becomes a multilateral systems approach, which may suit the multinational character of the seed trade. The benefits of such a multilateral systems approach, which involves multiple exporting and importing countries, are likely to be greater when a larger number of countries participate in it, providing more predictability for seed movement.	C	<p>Category : <i>SUBSTANTIVE</i>  <b>(513) Japan (20 Sep 2024 10:45 AM)</b>  The reason why more predictability is provided should be clarified.</p> <p>As there is not enough understanding and experiences on multilateral systems approach, there may be different perceptions from country to country.</p>
44	The development of a systems approach is described in ISPM 14 ( <i>The use of integrated measures in a systems approach for pest risk management</i> ) as a bilateral process involving the NPPO of an importing country and the NPPO of an exporting country, which may also <del>involve</del> <u>include consultation with</u> stakeholders from <u>the</u>	P	<p>Category : <i>TECHNICAL</i>  <b>(396) EPPO (15 Sep 2024 5:49 PM)</b>  1) Addition of "include consultation with [stakeholders from] the scientific community and [industry]" to be more in line with ISPM 14.</p> <p>2) Removal of "If this leads to the same systems approach for these countries,</p>

	<p><del>scientific community and</del> industry. The NPPOs of several countries may also develop <del>together a</del> <u>multilateral</u> systems approach for export from, and import into, their countries. <del>If this leads to the same</del> <u>The benefits of such a multilateral systems approach for these approach, which involves multiple exporting and importing countries, this becomes may be greater when a larger number of countries participate in it. multilateral systems approach, which may suit the multinational character of the seed trade. The benefits of such a multilateral systems approach, which involves multiple exporting and importing countries, are likely to be greater when a larger number of countries participate in it, providing more predictability for seed movement.</u></p>		<p>this becomes a multilateral systems approach, which may suit the multinational character of the seed trade”, and simply added multilateral to the preceding sentence – simpler wording.</p> <p>3) Replaced “are likely to” with “may” to provide more neutral wording.</p>
44	<p>The development of a systems approach is described in ISPM 14 (<i>The use of integrated measures in a systems approach for pest risk management</i>) as a bilateral process involving the NPPO of an importing country and the NPPO of an exporting country, which may also involve stakeholders from industry. The NPPOs of several countries may also develop together a systems approach for export from, and import into, their countries. If this leads to the same systems approach for these countries, this becomes a multilateral systems approach, which may suit the multinational character of the seed <del>trade. The benefits of such a multilateral systems approach, which involves multiple exporting and importing countries, are likely to be greater when a larger number of countries participate in it, providing more predictability for seed</del> movement.</p>	P	<p>Category : <i>TECHNICAL</i>  <b>(180) COSAVE (19 Aug 2024 12:36 AM)</b>          Predictability is not a matter of cumulative effect due to a greater number of participants. The reliability and predictability of a system approach is independent of the number of participants but rely on the appropriate integrated measures selected</p>
45	<p>As general guidance for developing a systems approach for seeds, this annex does not focus on any particular seed commodity but does address specific characteristics of the seed trade, <u>such as the potentially long periods over which seeds can be stored and delivered to many different customers in different countries.</u></p>	C	<p>Category : <i>SUBSTANTIVE</i>  <b>(615) European Union (28 Sep 2024 2:59 AM)</b>          The long periods of storage are hardly addressed. In fact, the draft fails to address the issue that may arise when the measures within the system approach have changed while seeds were in storage</p>
45	<p><del>As general guidance for developing a systems approach for seeds, this</del> <u>This</u> annex does not focus on <del>any a</del> particular seed commodity but <del>does-intends to</del> address specific characteristics of the seed <u>production and</u> trade, such as the potentially long periods over which seeds can be stored and delivered to many different customers in different countries.</p>	P	<p>Category : <i>TECHNICAL</i>  <b>(614) European Union (28 Sep 2024 2:57 AM)</b>          Does it really address these characteristics or is it just stating it? Rather the latter. We proposed replacing ‘does’ with ‘intends to address specific characteristics’.</p>
45	<p><del>As general guidance for developing a systems approach for seeds, this</del> <u>This</u> annex does not focus on <del>any a</del> particular seed commodity but <del>does-intends to</del> address specific characteristics of the seed <u>production and</u> trade, such as the potentially</p>	P	<p>Category : <i>TECHNICAL</i>  <b>(398) EPPO (15 Sep 2024 5:49 PM)</b>          First words are redundant and added more precise wording.</p> <p>Does it really address these characteristics or is it just stating it? Rather the</p>

	long periods over which seeds can be stored and delivered to many different customers in different countries.		latter. We proposed replacing 'does' with 'intends to address specific characteristics'.
45	As general guidance for developing a systems approach for seeds, this annex does not focus on any particular seed commodity but does address specific characteristics of the seed trade, <b>such as the potentially long periods over which seeds can be stored and delivered to many different customers in different countries.</b>	C	<i>Category : SUBSTANTIVE</i> <b>(397) EPPO (15 Sep 2024 5:49 PM)</b> The long periods of storage are hardly addressed. In fact, the draft fails to address the issue that may arise when the measures within the system approach have changed while seeds were in storage
45	<del>As general guidance for developing a systems approach for seeds, this annex does not focus on any particular seed commodity but does address specific characteristics of the seed trade, such as the potentially long periods over which seeds can be stored and delivered to many different customers in different countries.</del>	P	<i>Category : TECHNICAL</i> <b>(181) COSAVE (19 Aug 2024 12:38 AM)</b> Paragraph 45 moved after paragraph 42 because text aligns with the scope
46	<del>The framework is based on combining measures that, in addition to commonly used phytosanitary measures, may include components of the existing production practices and quality systems used by participating entities. The resulting systems approaches are developed by NPPOs, considering each critical control point (CCP) along the seed supply chain. One of the requirements of the framework is that each entity participating in the systems approach should be authorized by the NPPO of the country of origin.</del>	P	<i>Category : SUBSTANTIVE</i> <b>(709) Mexico (29 Sep 2024 7:42 PM)</b> Suggesting to remove, since it is redundant. Has already been stated earlier in the document.
46	The framework is based on combining measures <u>that, that may include</u> in addition to commonly used phytosanitary <u>measures, may include measures and</u> components of the existing production practices and quality systems used by <u>participating authorized</u> entities. <del>The resulting systems approaches are developed by NPPOs, considering each NPPOs should consider key</del> critical control <u>point points</u> (CCP) along the seed supply chain. One of the requirements of the framework is that <u>each entity participating in all entities that perform critical aspects of</u> the systems approach should be authorized by the NPPO of the country <u>where the entity is operating, in line with ISPM 45 (Requirements for national plant protection organizations if authorizing entities to perform phytosanitary actions). This annex outlines the responsibilities of origin</u> NPPOs and their relation with the entities <u>participating in the systems approach.</u>	P	<i>Category : TECHNICAL</i> <b>(616) European Union (28 Sep 2024 3:08 AM)</b> 1) Why would the commonly used phytosanitary measures not be part of the combined measures? The wording of this paragraph has been improved.  2) Addition of a reference to ISPM 45.  3) The last sentence (modified) is coming from the end of paragraph 47 because it better fits here.
46	The framework is based on combining measures that, in addition to commonly used phytosanitary measures, may include components of the existing production practices and quality systems used by participating entities. The resulting systems	P	<i>Category : TECHNICAL</i> <b>(562) Canada (26 Sep 2024 9:04 PM)</b> Country of export rather than origin is more accurate. See definition in ISPM 5 of country of origin. There should be some level of discretion negotiated between the NPPOs to determine if all entities involved in the SA needs to be

	approaches are developed by NPPOs, considering each critical control point (CCP) along the seed supply chain. One of the requirements of the framework is that <del>each</del> entity participating in the systems approach should be authorized by the NPPO of the country of <del>origin</del> export.		be authorized
46	The framework is based on combining measures that, in addition to commonly used phytosanitary measures, may include components of the existing production practices and quality systems used by participating entities. The resulting systems approaches are developed by NPPOs, considering each critical control point (CCP) along the seed supply chain. One of the requirements of the framework is that each <del>entity</del> entities participating in the systems approach should be authorized by the NPPO of the country of origin.	P	Category : EDITORIAL (563) Canada (26 Sep 2024 9:05 PM)
46	The framework is based on combining measures <del>that, in addition to commonly used phytosanitary measures, that</del> may include components of the existing production practices and quality systems used by participating entities. The resulting systems approaches are developed by NPPOs, considering each critical control point (CCP) along the seed supply chain. One of the requirements of the framework is that each entity participating in the systems approach should be authorized by the NPPO of the country of origin.	P	Category : SUBSTANTIVE (561) Canada (26 Sep 2024 9:00 PM) This gives the impression that the systems approach for seeds between countries will mean adding many new requirements to the current ones. It could mean stacking of requirements of the different countries and possibly also including entity practices. This may lead to increased complexity.
46	<del>The framework is based on combining</del> A systems approach for seeds combines measures that, in addition to commonly used phytosanitary measures, may include components of the existing production practices and quality systems used by participating entities. <del>The resulting systems approaches. These measures are developed by NPPOs, considering each applied at</del> critical control <del>point</del> points (CCP) <del>along identified throughout the seed supply chain</del> production process. <del>One of the requirements of the framework is that each entity</del> NPPOs may independently design a systems approach, or if existing production practices and quality systems are included, collaboration between NPPOs and NPPOs participating <del>in the entities</del> may be necessary to design a systems approach <del>should be authorized by the NPPO of the country of origin</del> incorporating these components.	P	Category : TECHNICAL (478) United States of America (17 Sep 2024 8:09 PM) Better logical structure, less redundancies. In some cases, an entity's seed processing, conditioning, and packaging facilities may be located in a country of re-export and not a country of origin. In these cases, the NPPO of the country of re-export may have to be involved in the authorization (accreditation) processes with the NPPO of the country of origin.
46	The framework is based on combining measures <del>that that may include</del> , in addition to commonly used phytosanitary <del>measures, may include measures and</del> components of the existing production practices and quality systems used by <del>participating</del> authorized entities. <del>The resulting systems approaches are developed by</del> NPPOs, <del>considering each should consider key</del> critical control <del>point</del> points (CCP) along the	P	Category : TECHNICAL (399) EPPO (15 Sep 2024 5:49 PM) 1) Why would the commonly used phytosanitary measures not be part of the combined measures? The wording of this paragraph has been improved.  2) Addition of a reference to ISPM 45.

	seed supply chain. One of the requirements of the framework is that <del>each entity participating in all entities that perform critical aspects of</del> the systems approach should be authorized by the NPPO of the country <del>where the entity is operating, in line with ISPM 45 (Requirements for national plant protection organizations if authorizing entities to perform phytosanitary actions). This annex outlines the responsibilities of origin</del> NPPOs and their relation with the entities participating in the systems approach.		3) The last sentence (modified) is coming from the end of paragraph 47 because it better fits here.
46	The framework is based on combining measures that, in addition to commonly used phytosanitary measures, may include components of the existing production practices and quality systems used by participating entities. The resulting systems approaches are developed by NPPOs, considering each critical control point (CCP) along the seed supply chain. One of the requirements of the framework is that each entity participating in the systems approach should be authorized by the NPPO of the country of <del>origin</del> origin of the seed.	P	Category : EDITORIAL <b>(353) New Zealand (11 Sep 2024 1:05 AM)</b> To improve clarity
46	<del>The framework is based on combining measures that, in addition to commonly used phytosanitary measures, may include components of the existing production practices and quality systems used by participating entities. The resulting systems approaches are developed by NPPOs, considering each critical control point (CCP) along the seed supply chain where specified pest risks can be reduced and monitored.</del> One of the requirements of the framework is that each entity participating in the systems approach should be authorized by the NPPO of the country of origin, <u>according to ISPM 45 (Requirements for national plant protection organisations if authorising entities to perform phytosanitary actions)</u>	P	Category : TECHNICAL <b>(182) COSAVE (19 Aug 2024 12:44 AM)</b> 1) Deleted because it was already mentioned in paragraph 33, 2) To align it to ISPM 14 and in order to add clarity into the use of CCP in relation to pest risk management., 3) Add reference to ISPM 45 because it is relevant
47	<del>A systems approach may be used as an equivalent alternative to stand-alone phytosanitary treatments to manage the pest risk (see ISPM 14) associated with the movement of seeds. Where used, systems approaches should be developed by NPPOs. This annex outlines the responsibilities of NPPOs and, if applicable, the basic requirements for each of the entities participating in the systems approach.</del>	P	Category : SUBSTANTIVE <b>(710) Mexico (29 Sep 2024 7:43 PM)</b> Removing, since it has already been mentioned in the scope. Avoiding duplication of concepts.
47	<del>A systems approach may be used as an equivalent alternative to stand-alone phytosanitary treatments to manage the pest risk (see ISPM 14) associated with the movement of seeds. Where used, systems approaches should be developed by NPPOs. This annex outlines the responsibilities of NPPOs and, if applicable, the basic requirements for each of the entities participating involved</del> in the systems	P	Category : TECHNICAL <b>(617) European Union (28 Sep 2024 3:10 AM)</b> 1) Suggestion to delete the first two sentences because it is already stated before.  2) Second sentence simplified.

	approach.		
47	A systems approach may be used as an equivalent alternative to stand-alone phytosanitary <del>treatments-measures</del> to manage the pest risk (see ISPM 14) associated with the movement of seeds. Where used, systems approaches should be developed by NPPOs. This annex outlines the responsibilities of NPPOs and, if applicable, the basic requirements for each of the entities participating in the systems approach.	P	Category : TECHNICAL <b>(535) Canada (20 Sep 2024 9:48 PM)</b> Measures are broad and include treatments
47	A systems approach may be used as an equivalent alternative to stand-alone phytosanitary treatments <u>or other traditional phytosanitary measures</u> to manage the pest risk (see ISPM 14) associated with the movement of seeds. Where used, systems approaches should be developed by NPPOs. This annex outlines the responsibilities of NPPOs and, if applicable, the basic requirements for each of the entities participating in the systems approach.	P	Category : TECHNICAL <b>(479) United States of America (17 Sep 2024 8:14 PM)</b> clarity
47	<del>A systems approach may be used as an equivalent alternative to stand-alone phytosanitary treatments to manage the pest risk (see ISPM 14) associated with the movement of seeds. Where used, systems approaches should be developed by NPPOs. This annex outlines the responsibilities of NPPOs and, if applicable, the basic requirements for each of the entities participating in the systems approach.</del>	P	Category : TECHNICAL <b>(400) EPPO (15 Sep 2024 5:49 PM)</b> 1) Suggestion to delete the first two sentences because t is already stated before.  2) Second sentence simplified.
47	A systems approach may be used as an equivalent alternative to stand-alone phytosanitary treatments to manage the pest risk (see ISPM 14) associated with the movement of seeds. Where used, systems approaches should be developed by NPPOs. <del>This annex outlines the responsibilities of NPPOs and, if applicable, the basic requirements for each of the entities participating in the systems approach</del> discussion with entities.	P	Category : SUBSTANTIVE <b>(355) New Zealand (11 Sep 2024 1:09 AM)</b> It is important to highlight that NPPOs should work with entities to ensure the feasibility and practicality of the SA and other relevant principles in ISPM 1.
47	A systems approach may be used as an equivalent alternative to stand-alone phytosanitary <u>measures, including phytosanitary</u> treatments to manage the pest risk (see ISPM 14) associated with the movement of seeds. Where used, systems approaches should be developed by NPPOs. This annex outlines the responsibilities of NPPOs and, if applicable, the basic requirements for each of the entities participating in the systems approach.	P	Category : TECHNICAL <b>(354) New Zealand (11 Sep 2024 1:07 AM)</b> Suggest re-phrasing this sentence to reflect that phytosanitary treatments are only one example of a stand-alone measure.
47	<del>A systems approach may be used as an equivalent alternative to stand-alone phytosanitary treatments to manage the pest risk (see ISPM 14) associated with the movement of seeds. Where used, systems approaches should be developed by</del>	P	Category : TECHNICAL <b>(183) COSAVE (19 Aug 2024 12:46 AM)</b> We suggest to delete the entire paragraph to avoid duplication with paragraph 32

	<del>NPPOs. This annex outlines the responsibilities of NPPOs and, if applicable, the basic requirements for each of the entities participating in the systems approach.</del>		
48	<del>1.3 Purpose of systems approaches for seeds</del>	P	Category : SUBSTANTIVE <b>(712) Mexico (29 Sep 2024 7:44 PM)</b> There is no reason to include this paragraph in an introduction due to its content. It is not clear why ISPM12 is being included here. The purpose of the Annex is clearly stated in the Scope section. The content of the last two sentences has already been addressed in the Scope and background sections.
48	1.3 Purpose of <u>a</u> systems <del>approaches</del> <u>approach</u> for seeds	P	Category : EDITORIAL <b>(618) European Union (28 Sep 2024 3:11 AM)</b> Proposed improvement.
48	1.3 Purpose of <u>using a</u> systems <del>approaches</del> <u>approach</u> for seeds	P	Category : EDITORIAL <b>(401) EPPO (15 Sep 2024 5:49 PM)</b> Proposed improvement.
49	<del>According to ISPM 12 (<i>Phytosanitary certificates</i>), phytosanitary certification is used to attest that consignments meet phytosanitary import requirements and is undertaken by an NPPO. The purpose of systems approaches for seeds is to provide additional options for phytosanitary certification in line with the phytosanitary import requirements of all the NPPOs involved in the international movement of seeds along the seed supply chain. Any individual systems approach for seeds may involve the collaboration of NPPOs with the entities participating in that systems approach to ensure the health of seeds being produced and moved along the seed supply chain of the countries that recognize that systems approach. Elements of a systems approach are outlined in ISPM 14 and some of these may be relevant to a systems approach to seeds.</del>	P	Category : SUBSTANTIVE <b>(711) Mexico (29 Sep 2024 7:44 PM)</b> There is no reason to include this paragraph in an introduction due to its content. It is not clear why ISPM12 is being included here. The purpose of the Annex is clearly stated in the Scope section. The content of the last two sentences has already been addressed in the Scope and background sections.
49	According to ISPM 12 ( <i>Phytosanitary certificates</i> ), phytosanitary certification is used to attest that consignments meet phytosanitary import requirements and is undertaken by an NPPO. The purpose of <u>a</u> systems <del>approaches</del> <u>approach</u> for <u>seeds a seed commodity</u> is to provide <u>an</u> additional <del>options</del> <u>option</u> for phytosanitary certification in line with the phytosanitary import requirements of all the NPPOs involved in the international movement of <u>seeds along the seed supply chain</u> . <del>Any individual systems approach for seeds may involve the collaboration of NPPOs with the entities participating in that systems approach to ensure the health of seeds being produced and moved seed commodity</del> along the seed supply <del>chain of the countries that recognize that systems approach</del> <u>chain</u> . <del>Elements of a systems approach are outlined in ISPM 14 and some of these may be relevant to a systems</del>	P	Category : EDITORIAL <b>(636) European Union (29 Sep 2024 7:12 AM)</b> 1) More precise wording.  2) Deletion of the last but one sentence because it is not an easy sentence to read and it is repetitive.  3) Correct wording.  4) Deletion as already covered and seems unnecessary for this section.

	<a href="#">approach to seeds.</a>		
49	According to ISPM 12 ( <i>Phytosanitary certificates</i> ), phytosanitary certification is used to attest that consignments meet phytosanitary import requirements and is undertaken by an NPPO. The purpose of systems approaches for seeds is to provide additional options for phytosanitary certification in line with the phytosanitary import requirements of all the NPPOs involved in the international movement of seeds along the seed supply chain. Any individual systems approach for seeds may involve the collaboration of NPPOs with the entities participating in that systems approach <del>to ensure the health of seeds being produced and moved along the seed supply chain of the countries that recognize that systems approach.</del> Elements of a systems approach are outlined in ISPM 14 and some of these may be relevant to a systems approach to seeds.	P	Category : TECHNICAL <b>(565) Canada (26 Sep 2024 9:13 PM)</b> Simplifying the sentence to improve readability.
49	According to ISPM 12 ( <i>Phytosanitary certificates</i> ), phytosanitary certification is used to attest that consignments meet phytosanitary import requirements and is undertaken by an NPPO. The purpose of systems approaches for seeds is to provide additional options for phytosanitary certification in line with the phytosanitary import requirements of all the NPPOs involved in the international movement of seeds along the seed supply chain. <del>Any individual A</del> systems approach for seeds may involve the collaboration of NPPOs with the entities participating in that systems approach to ensure the health of seeds being produced and moved along the seed supply chain of the countries that recognize that systems approach. Elements of a systems approach are outlined in ISPM 14 and some of these may be relevant to a systems approach to seeds.	P	Category : TECHNICAL <b>(564) Canada (26 Sep 2024 9:10 PM)</b> The term "individual" created unnecessary ambiguity.
49	According to ISPM 12 ( <i>Phytosanitary certificates</i> ), phytosanitary certification is used to attest that consignments meet phytosanitary import requirements and is undertaken by an NPPO. The purpose of systems approaches for seeds is to provide additional options for phytosanitary certification in line with the phytosanitary import requirements of all the NPPOs involved in the international movement of seeds along the seed supply chain. <del>Any individual An</del> systems approach for seeds may involve the collaboration of NPPOs with the entities participating in that systems approach to ensure the health of seeds being produced and moved along the seed supply chain of the countries that recognize that systems approach. Elements of a systems approach are outlined in ISPM 14 and some of these may be relevant to a systems approach to seeds.	P	Category : TECHNICAL <b>(536) Canada (20 Sep 2024 9:53 PM)</b> Suggest to re-write the sentence to clarify the intention.

49	According to ISPM 12 ( <i>Phytosanitary certificates</i> ), phytosanitary certification is used to attest that consignments meet phytosanitary import requirements and is undertaken by an NPPO. The purpose of systems approaches for seeds is to provide <del>additional options</del> <u>a voluntary alternative option</u> for phytosanitary certification in line with the phytosanitary import requirements of all the NPPOs <del>involved in the international movement of seeds along the a multinational</del> seed supply chain. <del>Any individual</del> <u>A</u> systems approach for seeds may <del>involve</del> <u>require</u> the collaboration <del>of between</del> NPPOs <del>with the entities and participating in that systems approach entities</del> to ensure the health of seeds being produced and moved <del>along between the seed supply chain of the</del> countries that recognize that systems approach. Elements of a systems approach are outlined in ISPM 14 and <del>some many</del> of these <u>elements</u> may be relevant to a systems approach <del>to for</del> seeds.	P	<i>Category : TECHNICAL</i> <b>(480) United States of America (18 Sep 2024 3:44 PM)</b> Clarifying concepts and improving the flow
49	According to ISPM 12 ( <i>Phytosanitary certificates</i> ), phytosanitary certification is used to attest that consignments meet phytosanitary import requirements and is undertaken by an NPPO. The purpose of <u>a systems approaches approach</u> for <u>seeds a seed commodity</u> is to provide <u>an additional options option</u> for phytosanitary certification in line with the phytosanitary import requirements of all the NPPOs involved in the international movement of <u>seeds along the seed supply chain</u> . <del>Any individual systems approach for seeds may involve the collaboration of NPPOs with the entities participating in that systems approach to ensure the health of seeds being produced and moved seed commodity along the seed supply chain of the countries that recognize that systems approach. Elements of a systems approach are outlined in ISPM 14 and some of these may be relevant to a systems approach to seeds chain.</del>	P	<i>Category : EDITORIAL</i> <b>(402) EPPO (15 Sep 2024 5:49 PM)</b> 1) More precise wording.  2) Deletion of the last but one sentence because it is not an easy sentence to read and it is repetitive.  3) Correct wording.  4) Deletion as already covered and seems unnecessary for this section.
49	According to ISPM 12 ( <i>Phytosanitary certificates</i> ), phytosanitary certification is used to attest that consignments meet phytosanitary import requirements and is undertaken by an NPPO. The purpose of systems approaches for seeds is to provide additional options for phytosanitary certification in line with the phytosanitary import requirements of all the NPPOs involved in the international movement of seeds along the seed supply chain. Any individual systems approach for seeds may involve the collaboration of NPPOs with the entities participating in that systems approach to ensure <del>the health of that healthy</del> seeds <u>(free from pests)</u> <u>are</u> being produced and moved along the seed supply chain of the countries that recognize that systems approach. Elements of a systems approach are outlined in ISPM 14 and some of these may be relevant to a systems approach to seeds.	P	<i>Category : TECHNICAL</i> <b>(356) New Zealand (11 Sep 2024 1:11 AM)</b> NZ suggests using the term 'healthy seeds (free from pests)' rather than "health of seeds" to be consistent with ISPM 38. Propose that this is a global change as needed.

49	According to ISPM 12 ( <i>Phytosanitary certificates</i> ), phytosanitary certification is used to attest that consignments meet phytosanitary import requirements and is undertaken by an NPPO. The purpose of systems approaches for seeds is to provide additional options for phytosanitary certification in line with the phytosanitary import requirements of all the NPPOs involved in the international movement of seeds along the seed supply chain. Any individual systems approach for seeds may involve the collaboration of NPPOs with the entities participating in that systems approach to ensure the health of seeds being produced and moved along the seed supply chain of the countries that recognize that systems approach. Elements of a systems approach are outlined in ISPM 14 and some of these may be relevant to a systems approach to seeds.	C	<p>Category : <i>EDITORIAL</i>  <b>(339) Indonesia (1 Sep 2024 8:25 AM)</b>  Propose to delete first sentence.</p> <p>Unnecessary sentence in this part (purpose of SA for seed).</p>
49	<del>According to ISPM 12 (<i>Phytosanitary certificates</i>), phytosanitary certification is used to attest that consignments meet phytosanitary import requirements and is undertaken by an NPPO. The purpose of systems approaches for seeds is to provide additional options for phytosanitary certification in line with the phytosanitary import requirements of all the NPPOs involved in the international movement of seeds along the seed supply chain. Any individual systems approach for seeds may involve the collaboration of NPPOs with the entities participating in that systems approach to ensure the health of seeds being produced and moved along the seed supply chain of the countries that recognize that systems approach. Elements of a systems approach are outlined in ISPM 14 and some of these may be relevant to a systems approach to seeds.</del> <u>The purpose of a systems approach for seeds is to provide another option for pest risk management to meet the phytosanitary import requirements of all the NPPOs involved in the international movement of seeds along the seed supply chain. Any individual systems approach for seeds should involve the collaboration of NPPOs with the entities participating in that systems approach to manage the pest risk of seeds being produced and moved along the seed supply chain of the countries that recognize that systems approach. Elements of a systems approach are outlined in ISPM 14 and some of these may be relevant to a systems approach to seeds.</u>	P	<p>Category : <i>TECHNICAL</i>  <b>(185) COSAVE (19 Aug 2024 12:58 AM)</b>  1) Unnecessary text, 2) For consistency 3) SA is an option for pest risk management, 4) The purpose of SA is to meet the phytosanitary requirements not to ensure the health of seeds. It is an option for pest risk management.</p>
50	<b>1.4 Important considerations for systems approaches for seeds</b>	C	<p>Category : <i>SUBSTANTIVE</i>  <b>(713) Mexico (29 Sep 2024 7:45 PM)</b>  Delete all this point 1.4. This section should not be in an Introduction. Below, these considerations are addressed in Section 2. Suggesting to delete the whole section.</p>

50	<b>1.4 Important considerations for systems approaches for seeds</b>	C	<p>Category : <i>TECHNICAL</i>  <b>(481) United States of America (18 Sep 2024 3:47 PM)</b>  Some of these exceptions (for example, transportation and storage) can be adequately addressed using current phytosanitary certification practices. If the seed for blending purposes was produced under the SA prior to blending and can be documented as such, it should qualify to be certified under the SA</p>
51	Characteristic aspects of seed production and trade, compared to the production of and trade in other plants and plant products, are the potentially long periods over which the seeds can be stored and delivered and the potential delivery to many different customers in different countries, with multiple re-exports. <a href="#">A-Because of these specific characteristic aspects of the seed production chain, a</a> systems approach for seeds, especially when including measures and practices used in the seed supply chain, may need to consider whether special requirements are needed for:	P	<p>Category : <i>TECHNICAL</i>  <b>(637) European Union (29 Sep 2024 7:15 AM)</b>  Useful addition.</p>
51	Characteristic aspects of seed production and trade, compared to the production of and trade in other plants and plant products, are the potentially long periods over which the seeds can be stored and delivered and the potential delivery to many different customers in different countries, with multiple re-exports. A systems approach for <del>seeds, especially when including measures and practices used in the seed supply chain, seeds</del> may need to consider whether special requirements are needed for:	P	<p>Category : <i>EDITORIAL</i>  <b>(566) Canada (26 Sep 2024 9:17 PM)</b>  Simplifying for clarity</p>
51	Characteristic aspects of seed production and trade, compared to the production of and trade in other plants and plant products, are the potentially long periods over which the seeds can be stored and delivered and the potential delivery to many different customers in different countries, with multiple re-exports. <a href="#">A-Because of these specific characteristic aspects of the seed production chain, a</a> systems approach for seeds, especially when including measures and practices used in the seed supply chain, may need to consider whether special requirements are needed for:	P	<p>Category : <i>TECHNICAL</i>  <b>(403) EPPO (15 Sep 2024 5:49 PM)</b>  Useful addition.</p>
51	Characteristic aspects of seed production and trade, compared to the production of and trade in other plants and plant products, are the potentially long periods over which the seeds can be stored and delivered and the potential delivery to many different customers in different countries, with multiple re-exports. <del>A systems approach for seeds, especially when including measures and practices used in the seed supply chain, may need to consider whether special requirements are needed for:</del>	P	<p>Category : <i>TECHNICAL</i>  <b>(357) New Zealand (11 Sep 2024 1:12 AM)</b>  This text and bullets are not needed. If not approved, the seed doesn't move under the SA. It can still move under the bilateral system.</p>

51	Characteristic aspects of seed production and <del>trade, compared to the production of and trade in other plants and plant products, international movement</del> are the potentially long periods over which the seeds can be stored and delivered and the potential delivery to many different customers in different countries, with multiple re-exports. A systems approach for seeds, especially when including <del>measures and</del> practices used in the seed supply chain, may need to consider whether special requirements are needed for:	P	Category : TECHNICAL <b>(186) COSAVE (19 Aug 2024 1:01 AM)</b> 1) For consistency, 2) see COSAVE general comment
52	seeds produced before an entity was authorized to participate in the systems <del>approach (such seeds should not be traded under the systems approach)</del> approach;	P	Category : TECHNICAL <b>(567) Canada (26 Sep 2024 9:19 PM)</b> These are only considerations and not requirements
52	<del>seeds produced before an entity was authorized to participate in the systems approach (such seeds should not be traded under the systems approach);</del>	P	Category : TECHNICAL <b>(358) New Zealand (11 Sep 2024 1:12 AM)</b> These bullets are not needed. If not approved, the seed doesn't move under the SA. It can still move under the bilateral system.
52	seeds produced before an entity was authorized to participate in the systems approach (such seeds should not be <del>traded-moved</del> under the systems approach);	P	Category : TECHNICAL <b>(187) COSAVE (19 Aug 2024 1:02 AM)</b> For consistency
53	seeds produced before the systems approach was approved by the NPPO of an importing country <del>(such seeds should be checked to determine to what extent (to ensure that</del> they comply with the phytosanitary import requirements of the importing country);	P	Category : SUBSTANTIVE <b>(638) European Union (29 Sep 2024 7:24 AM)</b> Meeting the phytosanitary import requirements of the importing country is an obligation.
53	seeds produced before the systems approach was approved by the NPPO of an importing country <del>(such seeds should be checked to determine to what extent (to ensure that</del> they comply with the phytosanitary import requirements of the importing country);	P	Category : SUBSTANTIVE <b>(457) EPPO (15 Sep 2024 6:34 PM)</b> Meeting the phytosanitary import requirements of the importing country is an obligation.
53	<del>seeds produced before the systems approach was approved by the NPPO of an importing country (such seeds should be checked to determine to what extent they comply with the phytosanitary import requirements of the importing country);</del>	C	Category : TECHNICAL <b>(359) New Zealand (11 Sep 2024 1:13 AM)</b> These bullets are not needed. If not approved it doesn't move under the SA. It can still move under the bilateral system.
54	the transport of bulk seed;	C	Category : SUBSTANTIVE <b>(516) Japan (20 Sep 2024 11:25 AM)</b> Japan suggests the definition of bulk seeds here be clarified and the reason why bulk seeds would need special requirements added. While "bulking" is referred to in the core text of the standard, the term "bulk" is often used to refer to the state of seed packaging prior to processing into sachets in industry.
54	<del>the transport of bulk seed;</del>	P	Category : TECHNICAL <b>(360) New Zealand (11 Sep 2024 1:13 AM)</b> These bullets are not needed. If not approved, the seed doesn't move under the SA. It can still move under the bilateral system.

54	<del>the transport of bulk seed;</del>	P	Category : <i>TECHNICAL</i> <b>(278) COSAVE (26 Aug 2024 2:00 AM)</b> It is not a common practice in seed production
55	<del>the storage of seeds; and</del>	P	Category : <i>TECHNICAL</i> <b>(361) New Zealand (11 Sep 2024 1:13 AM)</b> These bullets are not needed. If not approved, the seed it doesn't move under the SA. It can still move under the bilateral system.
56	the mixing or blending of seeds from different origins or places of production. <a href="#">[NEW POINT] the purity of seed lots</a> <a href="#">[NEW POINT] seed lot/code traceability along the supply chain</a>	P	Category : <i>SUBSTANTIVE</i> <b>(814) Australia (30 Sep 2024 7:58 PM)</b> New point 1. The purity considers risk associated with weed seeds and other contaminants (that are not pathogens). New point 2. This has to do with the transition of seed lot/code numbers as the seed progresses through the supply chain. Seed lots numbers change at different stages of production and traceability must be maintained from end-to-end.
56	the mixing or blending of seeds from different <a href="#">countries of</a> origins or places of production.	P	Category : <i>TECHNICAL</i> <b>(639) European Union (29 Sep 2024 7:26 AM)</b> More precise wording.
56	the mixing or blending of seeds from different <del>origins</del> <a href="#">countries of origin</a> or places of production.	P	Category : <i>TECHNICAL</i> <b>(404) EPPO (15 Sep 2024 5:49 PM)</b> More precise wording.
56	<del>the mixing or blending of seeds from different origins or places of production.</del>	P	Category : <i>TECHNICAL</i> <b>(362) New Zealand (11 Sep 2024 1:14 AM)</b> These bullets are not needed. If not approved, seed doesn't move under the SA. It can still move under the bilateral system.
57	Production practices used by participating entities may be included as measures in systems approaches if those practices are recognized by participating NPPOs as <a href="#">effectively-sufficiently effective in</a> managing pest risk. Such measures, in combination with the participating entities' quality systems (including audit and other requirements as outlined in this annex), should be considered <a href="#">by the participating importing countries</a> as meeting <del>the their</del> phytosanitary import <a href="#">requirements of the importing countries</a> requirements.	P	Category : <i>SUBSTANTIVE</i> <b>(640) European Union (29 Sep 2024 7:28 AM)</b> More appropriate wording as this decision is up to the importing country.
57	Production practices used by participating entities may be included as measures in systems approaches if those practices are recognized by participating NPPOs as effectively managing pest risk. Such measures, in combination with the participating entities' quality systems (including audit and other requirements as outlined in this annex), <del>should</del> <a href="#">may</a> be considered as meeting the phytosanitary import requirements of the importing countries.	P	Category : <i>TECHNICAL</i> <b>(568) Canada (26 Sep 2024 9:27 PM)</b> "May" is preferable to "should" given that the NPPO of the importing country needs to assess the systems approach
57	<del>Production practices used by participating entities may be included as measures in</del>	P	Category : <i>EDITORIAL</i>

	<del>systems approaches if those practices are recognized by participating NPPOs as effectively managing pest risk. Such measures, in combination with the participating entities' quality systems (including audit and other requirements as outlined in this annex), should be considered as meeting the phytosanitary import requirements of the importing countries.</del>		<b>(548) Japan (26 Sep 2024 6:10 AM)</b> Move this paragraph to Scope (paragraph 42).
57	Production practices used by participating entities may be included as measures in systems approaches if those practices are recognized by participating NPPOs as <del>effectively sufficiently effective in</del> managing pest risk. Such measures, in combination with the participating entities' quality systems (including audit and other requirements as outlined in this annex), should be considered <del>by the participating importing countries</del> as meeting <del>the their</del> phytosanitary import <del>requirements of the importing countries</del> requirements.	P	<i>Category : SUBSTANTIVE</i> <b>(405) EPPO (15 Sep 2024 5:49 PM)</b> More appropriate wording as this decision is up to the importing country.
57	Production practices <u>and quality systems</u> used by participating entities may be included as measures in systems approaches if those practices are recognized by participating NPPOs as effectively managing pest <del>risk. Such measures, in combination with risk to meet the participating entities' quality systems (including audit and other requirements as outlined in this annex), should be considered as meeting the</del> phytosanitary import requirements of the importing countries.	P	<i>Category : TECHNICAL</i> <b>(188) COSAVE (19 Aug 2024 1:06 AM)</b> For consistency with paragraph 33
58	Systems approaches for seeds may be used to manage pest groups rather than individual pests (based on the concept outlined in ISPM 36). <u>If systems approaches are developed for pest groups, NPPOs should allow additional declarations (see ISPM 12 for guidance) to use more generic wording rather than listing only individual species.</u>	C	<i>Category : SUBSTANTIVE</i> <b>(779) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b> Consider moving to section 2.4
58	Systems approaches for seeds may be used to manage pest groups rather than individual pests (based on the concept outlined in ISPM 36). <del>If systems approaches are developed for pest groups, NPPOs should allow additional declarations (see ISPM 12 for guidance) to use more generic wording rather than listing only individual species.</del>	P	<i>Category : SUBSTANTIVE</i> <b>(765) Korea, Republic of (30 Sep 2024 8:05 AM)</b> This para should be moved to para 96 of 2.4 issuance of phytosanitary certificate.
58	<del>Systems approaches for seeds may be used to manage pest groups rather than individual pests (based on the concept outlined in ISPM 36).</del> If systems approaches are developed for pest groups, NPPOs should allow additional declarations (see ISPM 12 for guidance) to use more generic wording rather than listing only individual species.	P	<i>Category : SUBSTANTIVE</i> <b>(764) Korea, Republic of (30 Sep 2024 8:04 AM)</b> This para is overlapping with para 42.
58	<del>Systems approaches for seeds may be used to manage pest groups rather than</del>	P	<i>Category : SUBSTANTIVE</i> <b>(714) Mexico (29 Sep 2024 7:47 PM)</b>

	<del>individual pests (based on the concept outlined in ISPM 36). If systems approaches are developed for pest groups, NPPOs should allow additional declarations (see ISPM 12 for guidance) to use more generic wording rather than listing only individual species.</del>		Pest groups were already mentioned in paragraph [42]. Additional Declarations will be agreed between NPPOs while designing the SA.
58	<del>Systems approaches for seeds may be used to manage pest groups rather than individual pests (based on the concept outlined in ISPM 36). If systems approaches are developed for pest groups, NPPOs should allow additional declarations (see ISPM 12 for guidance) to use more generic wording rather than listing only individual species.</del>	P	Category : TECHNICAL <b>(641) European Union (29 Sep 2024 7:31 AM)</b> As already covered (see para 96).
58	Systems approaches for seeds may be used to manage pest groups rather than individual pests (based on the concept outlined in ISPM 36). If systems approaches are developed for pest groups, NPPOs should allow additional declarations (see ISPM 12 for guidance) to use more generic wording rather than listing only individual species. <u>Such declarations should be agreed upon by the NPPOs of the countries participating in the systems approach.</u>	P	Category : TECHNICAL <b>(569) Canada (26 Sep 2024 10:09 PM)</b> Additional text suggested to provide greater clarity.
58	Systems approaches for seeds may be used to manage pest groups rather than individual pests (based on the concept outlined in ISPM 36). If systems approaches are developed for pest groups, NPPOs should allow additional declarations (see ISPM 12 for guidance) <b>to use more generic wording rather than listing only individual species.</b>	C	Category : TECHNICAL <b>(484) United States of America (18 Sep 2024 4:42 PM)</b> The idea is to get away from additional declarations for individual pests. If an NPPO determines that a given SA mitigates risk of a given pest species, the generic phytosanitary certification language should still be sufficient
58	Systems approaches for seeds may be used to manage pest groups rather than individual pests (based on the concept outlined in ISPM 36). If systems approaches are developed for pest groups, NPPOs <del>should allow</del> <u>may consider accepting</u> additional declarations (see ISPM 12 for guidance) to use more generic wording rather than listing only individual species.	P	Category : TECHNICAL <b>(482) United States of America (18 Sep 2024 3:52 PM)</b> A statement about being produced under an approved SA could also go in distinguishing marks section of the PC. May depend on whether required/ or an option to meet entry requirements by importing country regulation and may also depend on ISPM12 guidance
58	<del>Systems approaches for seeds may be used to manage pest groups rather than individual pests (based on the concept outlined in ISPM 36). If systems approaches are developed for pest groups, NPPOs should allow additional declarations (see ISPM 12 for guidance) to use more generic wording rather than listing only individual species.</del>	P	Category : TECHNICAL <b>(406) EPPO (15 Sep 2024 5:49 PM)</b> As already covered (see para 96).
58	Systems approaches for seeds may be used to manage pest groups rather than individual pests (based on the concept outlined in <a href="#">Appendix 1 of ISPM 36</a> ). If systems approaches are developed for pest groups, NPPOs should allow additional	P	Category : EDITORIAL <b>(363) New Zealand (11 Sep 2024 1:18 AM)</b> Suggest stating Appendix 1 of ISPM 36 because the appendix is not a prescriptive part of ISPM 36.

	declarations (see ISPM 12 for guidance) to use more generic wording rather than listing only individual species.		
58	<del>Systems approaches for seeds may be used to manage pest groups rather than individual pests (based on the concept outlined in ISPM 36). If systems approaches are developed for pest groups, NPPOs should allow additional declarations (see ISPM 12 for guidance) to use more generic wording rather than listing only individual species.</del>	P	Category : TECHNICAL <b>(189) COSAVE (19 Aug 2024 1:08 AM)</b> 1) First sentence deleted to avoid duplication with paragraph 42, 2) Second sentence moved to paragraph 96
59	To verify that regulated pests have been eliminated from the seed supply chain, NPPOs should always consider the feasibility of including seed testing as <del>an</del> <u>independent</u> a measure within the systems approach or as a verification procedure.	P	Category : SUBSTANTIVE <b>(815) Australia (30 Sep 2024 8:00 PM)</b> Testing can be used as a measure within the systems approach. It may not be independent. For example, where there has been seed testing earlier in the supply chain.
59	To verify that regulated pests have been eliminated <u>or comply with tolerance levels (for RNQPs)</u> from the seed supply chain, NPPOs should always consider the feasibility of including seed testing as an independent measure within the systems approach or as a verification procedure.	P	Category : SUBSTANTIVE <b>(780) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b>
59	<del>To verify that regulated pests have been eliminated from the seed supply chain, NPPOs should always consider the feasibility of including seed testing as an independent measure within the systems approach or as a verification procedure.</del>	P	Category : SUBSTANTIVE <b>(715) Mexico (29 Sep 2024 7:49 PM)</b> Wrong wording. Measures are agreed upon to minimize the pest risk; pests are not eliminated. The processes of importing NPPOs (verification) do not have to be specific in a Systems Approach.
59	To verify <del>that regulated pests have been eliminated from the seed supply chain</del> <u>absence of regulated pests</u> , NPPOs <del>should always consider</del> <u>may consider</u> the feasibility of including seed testing as an independent <del>measure within the systems approach or as a</del> verification procedure.	P	Category : EDITORIAL <b>(642) European Union (29 Sep 2024 7:34 AM)</b> More appropriate wording.
59	To verify that <u>the risk of</u> regulated pests <del>have has</del> been <del>eliminated from mitigated</del> <u>using the seed supply chainsystems approach</u> , NPPOs <del>should always may</del> consider <del>the feasibility of</del> including seed testing as an independent measure <del>within the systems approach if technically justified</del> or as a verification procedure.	P	Category : TECHNICAL <b>(570) Canada (26 Sep 2024 10:15 PM)</b> Seed health testing should only be used/ required when there is technical justification to do so. The risk of many regulated pests can be mitigated by a range of production practices and seed health testing is not always needed or testing methods may be lacking. The use of molecular testing as an independent measure should only be used if necessary. PCR-methods are relatively easy and cheap to develop and fast to apply but care should be taken that the methods are properly validated. Issues such as the relevance of a positive test result (does it show presence of a viable pathogen) and the need for proper lab procedures (cross contamination, sampling) must be taken into consideration.
59	To verify that regulated pests have been eliminated from the seed supply chain, NPPOs should always consider the feasibility of including seed testing <del>as an</del>	P	Category : SUBSTANTIVE <b>(517) Japan (20 Sep 2024 11:47 AM)</b>

	<del>independent measure within the systems approach</del> or as a verification procedure.		As para32 explains the recognition of a systems approach may serve as an alternative to single measures, this phrase would be confusing.
59	To verify that regulated pests have been eliminated from the seed supply chain, NPPOs <del>should always consider the feasibility of</del> <u>may consider</u> including seed testing <u>either</u> as an independent measure <u>performed by the participating entity</u> within the systems approach or as a verification <del>procedure</del> <u>step taken by NPPOs</u> . <u>If verification testing is done, NPPOs may choose to adjust the frequency of testing according to several factors, including the history of regulated pest detections (or lack of detections) in seeds produced under the systems approach. A recently implemented systems approach or one with a recent pest detection, for example, may call for a higher frequency of verification testing than a long-standing systems approach with a history of effective pest mitigation.</u>	P	Category : TECHNICAL <b>(483) United States of America (18 Sep 2024 3:58 PM)</b> More thorough explanation
59	To verify <del>that the absence of</del> regulated pests <del>have been eliminated from the seed supply chain</del> , NPPOs <del>should always</del> <u>may</u> consider the feasibility of including seed testing as an <del>independent measure within the systems approach or as a</del> <u>independent</u> verification procedure.	P	Category : EDITORIAL <b>(407) EPPO (15 Sep 2024 5:49 PM)</b> More appropriate wording.
59	To verify that regulated pests have been <del>eliminated from</del> <u>effectively managed in</u> the seed supply chain, <del>NPPOs should always consider the feasibility of including seed testing as an independent measure within lots produced in the systems approach or as a verification procedure</del> <u>supply chain may be tested for these pests where technically justified.</u>	P	Category : TECHNICAL <b>(364) New Zealand (11 Sep 2024 1:21 AM)</b> NZ proposes rewording this sentence to emphasize that seed testing may be used as a verification procedure if it is technically justified.
59	To verify that <u>the risk of</u> regulated pests have been <del>eliminated from</del> <u>managed in</u> the seed supply chain, NPPOs <del>should always</del> <u>should</u> consider the feasibility of including seed testing as <del>an independent measure within the systems approach or as</del> a verification procedure.	P	Category : TECHNICAL <b>(190) COSAVE (19 Aug 2024 1:12 AM)</b> 1) The wording is not correct, pests are not eliminated, measures are agreed to minimize their risk. 2) One of the main reasons for a SA for seeds is to avoid seed testing, unless use as a verification procedure
60	Recognition of the equivalence of measures, <u>activities or procedures</u> which may include pest testing methods and diagnostic protocols, by NPPOs can lead to more efficient implementation of systems approaches.	P	Category : SUBSTANTIVE <b>(816) Australia (30 Sep 2024 8:01 PM)</b> Broader scope of things which can be recognised as equivalent.
60	Recognition of the equivalence of measures, which may include <u>phytosanitary treatments</u> , pest testing methods and diagnostic protocols, by NPPOs can lead to more efficient implementation of systems approaches.	P	Category : SUBSTANTIVE <b>(781) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b>
60	<del>Recognition of the equivalence of measures, which may include pest testing methods and diagnostic protocols, by NPPOs can lead to more efficient implementation of systems approaches.</del>	P	Category : SUBSTANTIVE <b>(716) Mexico (29 Sep 2024 7:50 PM)</b> Wording is confusing. Recognition of equivalent measures is not in line with its definition in ISPM5 and ISPM24.

60	<del>Recognition of the equivalence of measures, which may include pest testing methods and diagnostic protocols, by NPPOs can lead to more efficient implementation of systems approaches.</del>	P	Category : <i>TECHNICAL</i> <b>(643) European Union (29 Sep 2024 7:35 AM)</b> This sentence is not clear. Is the equivalence between testing and SA? The concept of equivalence is not mentioned elsewhere in this draft and in ISPM 14 it refers to the principle and not to the measures. Without the principle of equivalence is impossible to implement SA, it is not a question of implementing it in a more efficient way.
60	Recognition of the equivalence of measures, which may include pest testing methods and diagnostic protocols, by NPPOs can lead to <u>designing of</u> more efficient <del>implementation of</del> systems approaches.	P	Category : <i>SUBSTANTIVE</i> <b>(518) Japan (20 Sep 2024 11:52 AM)</b> Recognition of the equivalence of measures would be useful for designing systems approaches rather than for efficient implementation.
60	<del>Recognition of the equivalence of measures, which may include pest testing methods and diagnostic protocols, by NPPOs can lead to more efficient implementation of systems approaches.</del>	P	Category : <i>TECHNICAL</i> <b>(408) EPPO (15 Sep 2024 5:49 PM)</b> This sentence is not clear. Is the equivalence between testing and SA? The concept of equivalence is not mentioned elsewhere in this draft and in ISPM 14 it refers to the principle and not to the measures. Without the principle of equivalence is impossible to implement SA, it is not a question of implementing it in a more efficient way.
60	<del>Recognition of equivalent pest testing methods and diagnostic protocols, by NPPOs can lead to more efficient implementation of systems approaches.</del> <del>Recognition of the equivalence of measures, which may include pest testing methods and diagnostic protocols, by NPPOs can lead to more efficient implementation of systems approaches.</del>	P	Category : <i>TECHNICAL</i> <b>(191) COSAVE (19 Aug 2024 1:14 AM)</b> Equivalence of measures is the situation where, for a specified pest risk, different phytosanitary measures achieve a contracting party's appropriate level of protection according ISPM 5. SA may be equivalent to single measures and less restrictive. The paragraph is confusing. But recognition of the equivalence of measures refer to harmonize testing methods and diagnostic protocols among NPPOs
62	General guidance on the concepts and development of systems approaches by NPPOs is presented in ISPM 14. Systems approaches should be designed to <del>ensure the health manage pest risk</del> of seeds throughout the seed supply chain, integrating measures to reduce pest risk in a defined, clear and simple manner.	P	Category : <i>SUBSTANTIVE</i> <b>(717) Mexico (29 Sep 2024 7:51 PM)</b> Better wording
62	General guidance on the concepts and development of systems approaches by NPPOs is presented in ISPM 14. <del>Systems approaches should be designed to ensure the health of seeds throughout the seed supply chain, integrating measures to reduce pest risk in a defined, clear and simple manner.</del>	P	Category : <i>TECHNICAL</i> <b>(644) European Union (29 Sep 2024 7:35 AM)</b> Delete second part as it is not needed (and why simple?)
62	General guidance on the concepts and development of systems approaches by NPPOs is presented in ISPM 14. Systems approaches should be designed to ensure the health of seeds throughout the seed <del>supply chain</del> <u>production process</u> , integrating measures to reduce pest risk in a <del>defined, clear defined</del> and <del>simple clear</del> manner.	P	Category : <i>TECHNICAL</i> <b>(485) United States of America (18 Sep 2024 4:51 PM)</b> Referring to applying measures "throughout the seed supply chain" probably overstates the scope of how most systems approaches will be implemented. Suggest "throughout the seed production process". Should try to use consistent terms. In most cases, it will not really be "a simple manner"
62	General guidance on the concepts and development of systems approaches by NPPOs is presented in ISPM 14. <del>Systems approaches should be designed to ensure</del>	P	Category : <i>TECHNICAL</i> <b>(409) EPPO (15 Sep 2024 5:49 PM)</b>

	<del>the health of seeds throughout the seed supply chain, integrating measures to reduce pest risk in a defined, clear and simple manner.</del>		Delete second part as it is not needed (and why simple?)
62	General guidance on the concepts and development of systems approaches by NPPOs is presented in ISPM 14. Systems approaches should be designed to ensure the <del>health of that</del> seeds <u>remain healthy (free from pests)</u> throughout the seed supply chain, integrating measures to reduce pest risk in a defined, clear and simple manner.	P	Category : TECHNICAL <b>(365) New Zealand (11 Sep 2024 1:24 AM)</b> As per previous comment, suggest using the term 'healthy seeds (free from pests)' rather than "health of seeds" to be consistent with ISPM 38.
62	General guidance on the concepts and development of systems approaches by NPPOs is presented in ISPM 14. Systems approaches should be designed <u>in collaboration with participating entities</u> to <del>ensure manage</del> the <del>health-pest risk</del> of seeds throughout the seed supply chain, integrating measures <del>to reduce pest risk</del> in a defined, clear and simple manner.	P	Category : TECHNICAL <b>(192) COSAVE (19 Aug 2024 1:18 AM)</b> For consistency with paragraph 49. SA are designed as pest risk management option to reduce or manage pest risk of seeds
63	<b>2.1 Identification of the <del>commodity</del>seed species</b>	P	Category : TECHNICAL <b>(718) Mexico (29 Sep 2024 7:52 PM)</b> More accurate word
63	<b>2.1 Identification of the <del>commodity</del>seed species</b>	P	Category : TECHNICAL <b>(193) COSAVE (19 Aug 2024 1:20 AM)</b> Although in ISPM 5 commodity includes movement with other purposes, within the seed industry, commodity is associated only to trade. Therefore we suggest to use just the term seed species
64	Entities may identify a seed commodity that is of interest for international trade purposes and propose to interested NPPOs of <del>seed-producing</del> countries <u>involved in</u> that <u>supply chain that</u> a systems approach be developed for that commodity. A systems approach may be developed in collaboration with participating entities in so far as they can contribute to the reduction of pest risk through the systems approach.	P	Category : SUBSTANTIVE <b>(809) Australia (30 Sep 2024 7:43 PM)</b> Entities can propose commodities to multiple NPPOs in the supply chain.
64	Entities may identify a seed <del>commodity-species</del> that is of interest for international <del>trade purposes-movement with experimental (breeding) or commercial purpose</del> and propose to interested NPPOs of seed-producing countries that a systems approach be developed for that <del>commodityseed species</del> . A systems approach <del>may</del> <u>should</u> be developed in collaboration with participating entities <del>in so far as they can contribute to the reduction for better understanding of pest risk through the seed production systems approach-and pest management practices.</del>	P	Category : SUBSTANTIVE <b>(720) Mexico (29 Sep 2024 8:05 PM)</b> Changes in wording for better understanding. General comments include a broader explanation regarding "commodity" and "trade"
64	<del>Entities-The NPPOs</del> may identify a seed commodity that is of interest for international trade purposes and propose <del>to interested NPPOs of seed-producing countries that a systems approach be developed for that commodity. A systems</del>	P	Category : SUBSTANTIVE <b>(645) European Union (29 Sep 2024 7:38 AM)</b> 1) This is currently written from an industry point of view. Suggested rewording to put the onus back to the NPPO.

	<del>approach may be developed in collaboration with participating entities in so far as they can contribute to the reduction development of pest risk through the a</del> systems approach.		2) Deletion (or move somewhere else) as this paragraph is about identifying a commodity not who should be involved in developing a systems approach.
64	Entities may identify a seed commodity that is of interest for international trade purposes and propose to interested NPPOs of <del>seed-producing seed exporting</del> countries that a systems approach be developed for that commodity. A systems approach may be developed in collaboration with participating entities in so far as they can contribute to the reduction of pest risk through the systems approach.	P	<i>Category : TECHNICAL</i> <b>(571) Canada (26 Sep 2024 10:23 PM)</b> More general terminology to reflect that re-exporting countries may be involved in the discussions with the entities
64	Entities may identify a seed commodity that is of interest for international trade purposes and propose to interested NPPOs of seed-producing countries that a systems approach be developed for that commodity. A systems approach <u>for the seed commodity identified</u> may be developed in collaboration with participating entities in so far as they can contribute to the reduction of pest risk through the systems approach.	P	<i>Category : EDITORIAL</i> <b>(549) Japan (26 Sep 2024 6:25 AM)</b>
64	<u>Entities-Identification of the seed commodity may be undertaken by the NPPO of the importing country, or the exporting country, or ideally through the cooperation of both countries. In addition, entities may</u> identify a seed commodity that is of interest for international trade purposes and propose to interested NPPOs of seed-producing countries that a systems approach be developed for that commodity. A systems approach may be developed in collaboration with participating entities in so far as they can contribute to the reduction of pest risk through the systems approach.	P	<i>Category : SUBSTANTIVE</i> <b>(519) Japan (20 Sep 2024 11:53 AM)</b> The commodity that establishes a systems approach can be identified by not only participating entities but also the NPPO of the importing country or the exporting country.
64	<del>Entities-The NPPOs</del> may identify a seed commodity that is of interest for international trade purposes and propose <del>to interested NPPOs of seed-producing countries that a systems approach be developed for that commodity. A systems approach may be developed in collaboration with participating entities in so far as they can contribute to the reduction development of pest risk through the a</del> systems approach.	P	<i>Category : SUBSTANTIVE</i> <b>(410) EPPO (15 Sep 2024 5:49 PM)</b> 1) This is currently written from an industry point of view. Suggested rewording to put the onus back to the NPPO.  2) Deletion (or move somewhere else) as this paragraph is about identifying a commodity not who should be involved in developing a systems approach.
64	Entities may identify a seed <del>commodity that is of interest for international trade purposes-species</del> and propose to <del>interested</del> NPPOs of seed-producing countries that a systems approach be developed for that <del>commodity. A systems approach may be developed in collaboration with participating entities in so far as they can contribute to the reduction of pest risk through the systems approach. seed species.</del>	P	<i>Category : TECHNICAL</i> <b>(194) COSAVE (19 Aug 2024 1:25 AM)</b> 1) Although in ISPM 5 commodity includes movement with other purposes, within the seed industry, commodity is associated only to trade. Therefore we suggest to use just the term seed, 2) Last sentence deleted it has no relation with the title of the section
65	<b>2.2 Identification of individual pests or pest groups associated with</b>	P	<i>Category : TECHNICAL</i> <b>(195) COSAVE (19 Aug 2024 1:26 AM)</b>

	<b>the seed <del>commodity</del>species</b>		Although in ISPM 5 commodity includes movement with other purposes, within the seed industry, commodity is associated only to trade. Therefore we suggest to use just the term seed
66	For any particular seed commodity, a pest risk analysis (PRA) should be conducted and <u>accepted by all NPPOs involved in the seed supply chain, and the</u> pests or groups of pests expected to be associated with the seeds as a pathway should be identified (see ISPM 2 ( <i>Framework for pest risk analysis</i> ) and ISPM 11 ( <i>Pest risk analysis for quarantine pests</i> )). A PRA also serves as a basis for the phytosanitary import requirements, taking into account the purpose of seed imports (i.e. intended use) to determine the strength of measures required. When a new pest emerges and <u>a PRA evidence</u> shows that this pest is associated with the seed commodity that is covered by the systems approach, the systems approach should be re-evaluated and adjusted if necessary.	P	<p>Category : SUBSTANTIVE  <b>(817) Australia (30 Sep 2024 8:04 PM)</b></p> <p>1. Addition of text here to specify that a PRA should be conducted and agreed by all NPPOs involved in the systems approach. This is not articulated in Section 8 for 'Responsibilities of NPPOs'.</p> <p>2. Suggest that this is changed to 'evidence' shows that this pest is associated with the seed commodity. The use of PRA precludes re-evaluation of the approach if the department needs to activate emergency measures without going through the formal PRA process.</p>
66	For any particular seed commodity, a pest risk analysis (PRA) should be conducted and the pests or groups of pests expected to be associated with the seeds as a pathway should be identified (see ISPM 2 ( <i>Framework for pest risk analysis</i> ) and ISPM 11 ( <i>Pest risk analysis for quarantine pests</i> )). A PRA also serves as a basis for the phytosanitary import requirements, taking into account the purpose of seed imports (i.e. intended use) to determine the strength of measures required. When a new pest emerges and a PRA shows that this pest is associated with the seed commodity that is covered by the systems approach, the systems approach should be re-evaluated and adjusted if necessary.	C	<p>Category : SUBSTANTIVE  <b>(782) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b></p> <p>Add ISPM 21</p>
66	For any particular seed <del>commodity</del> species, a pest risk analysis (PRA) should be conducted and the pests or groups of pests expected to be associated with the seeds as a pathway should be <del>identified (see ISPM 2 (identified. Framework for pest risk analysis) A PRA also serves as a basis for the phytosanitary import requirements, considering the purpose of seed imports (i.e. experimental or commercial) to determine the strength of measures required. When a new pest emerges and ISPM 11 (a PRA shows that this pest is associated with the seed species that is covered by the systems approach, the systems approach should be re-evaluated and adjusted if necessary.</del> <del>Pest risk analysis for quarantine pests)). A PRA also serves as a basis for the phytosanitary import requirements, taking into account the purpose of seed imports (i.e. intended use) to determine the strength of measures required. When a new pest emerges and a PRA shows that this pest is associated with the seed commodity that is covered by the systems approach, the systems approach should be re-evaluated</del>	P	<p>Category : SUBSTANTIVE  <b>(721) Mexico (29 Sep 2024 8:08 PM)</b></p> <p>The references to PRA ISPMs are included already in ISPM38.</p> <p>ISPM 38 determines the purpose of import and those are the ones that should be considered by the SA. On the other hand, if we consider the intended use as defined by the IPPC, in this case, is sowing.</p>

	<del>and adjusted if necessary.</del>		
66	For any particular seed commodity, a pest risk analysis (PRA) should be conducted <del>and by</del> the <u>NPOs of the importing country or countries</u> . The pests or groups of pests expected to be associated with the <del>seeds as a pathway-seed commodity</del> should be identified (see ISPM 2 ( <i>Framework for pest risk analysis</i> ) and ISPM 11 ( <i>Pest risk analysis for quarantine pests</i> )). <u>The aim should be to develop a pest list agreed by all NPOs involved in the seed supply chain</u> . A PRA also serves as a basis for the phytosanitary import requirements, taking into account the purpose of seed imports (i.e. intended use) to determine the strength of measures required. When a new pest <del>emerges is identified</del> and a PRA shows that <del>this pest is associated with the seed commodity that is covered by the systems approach</del> <u>a pathway for this pest</u> , the systems approach should be re-evaluated and adjusted if necessary.	P	Category : TECHNICAL <b>(646) European Union (29 Sep 2024 7:43 AM)</b> Improved text and addition of an important element (pest list).
66	For any particular seed commodity, a pest risk analysis (PRA) should be conducted and the pests or groups of pests expected to be associated with the seeds as a pathway should be identified (see ISPM 2 ( <i>Framework for pest risk analysis</i> ) and ISPM 11 ( <i>Pest risk analysis for quarantine pests</i> ))) <del>and the ISPM 21 (Pest risk analysis for regulated non quarantine pests)</del> . A PRA also serves as a basis for the phytosanitary import requirements, taking into account the purpose of seed imports (i.e. intended use) to determine the strength of measures required. When a new pest emerges and a PRA shows that this pest is associated with the seed commodity that is covered by the systems approach, the systems approach should be re-evaluated and adjusted if necessary.	P	Category : SUBSTANTIVE <b>(629) China (29 Sep 2024 5:12 AM)</b> A systematic approach to cross-border transportation of seeds should consider regulated non-quarantine pests (RNQPs) and their associated risks.
66	For any particular seed commodity, a pest risk analysis (PRA) should be conducted <del>and by</del> the <u>NPOs of the importing country or countries</u> . The pests or groups of pests expected to be associated with the <del>seeds as a pathway-seed commodity</del> should be identified (see ISPM 2 ( <i>Framework for pest risk analysis</i> ) and ISPM 11 ( <i>Pest risk analysis for quarantine pests</i> )). <u>The aim should be to develop a pest list agreed by all NPOs involved in the seed supply chain</u> . A PRA also serves as a basis for the phytosanitary import requirements, taking into account the purpose of seed imports (i.e. intended use) to determine the strength of measures required. When a new pest <del>emerges is identified</del> and a PRA shows that <del>this pest is associated with the seed commodity that is covered by the systems approach</del> <u>a pathway for this pest</u> , the systems approach should be re-evaluated and adjusted if necessary.	P	Category : TECHNICAL <b>(411) EPPO (15 Sep 2024 5:49 PM)</b> Improved text and addiiton of an important element (pest list).
66	For any particular seed commodity, a pest risk analysis (PRA) should be conducted and the pests or groups of pests expected to be associated with the seeds as a	P	Category : SUBSTANTIVE <b>(366) New Zealand (11 Sep 2024 1:32 AM)</b>

	pathway should be identified (see ISPM 2 ( <i>Framework for pest risk analysis</i> ) and ISPM 11 ( <i>Pest risk analysis for quarantine pests</i> )). A PRA also serves as a basis for the phytosanitary import requirements, taking into account the purpose of seed imports (i.e. intended use) to determine the strength of measures required. When a new pest emerges and a PRA shows that this pest is associated with the seed commodity that is covered by the systems approach, the systems approach should be re-evaluated and adjusted if necessary-. <u>If the risk from the new pest is not managed by the existing system, additional measures may be required to manage this risk in seed lots produced under the systems approach before the new pest was identified.</u>		Suggest adding a new sentence that explains the outcome of the re-evaluation process.
66	For any particular <del>seed-commodityseed</del> , a pest risk analysis (PRA) should be conducted and the pests <del>or groups of pests</del> expected to be associated with the seeds as a pathway should be identified (see <del>ISPM 2 (section 1 of this standard)</del> <i>Framework for pest risk analysis</i> ). <del>When a new pest emerges and ISPM 11 (a PRA shows that this pest is associated with the seed, the systems approach should be re-evaluated and adjusted if necessary. <i>Pest risk analysis for quarantine pests</i>)). A PRA also serves as a basis for the phytosanitary import requirements, taking into account the purpose of seed imports (i.e. intended use) to determine the strength of measures required. When a new pest emerges and a PRA shows that this pest is associated with the seed commodity that is covered by the systems approach, the systems approach should be re-evaluated and adjusted if necessary.</del>	P	<i>Category : TECHNICAL</i> <b>(279) COSAVE (26 Aug 2024 2:07 AM)</b> Section 1 of ISPM 38 specifies PRA for seeds and refers to relevant PRA standards. Second sentence deleted because is already covered in the core text and is not related to this section
67	<b>2.3 Measures and critical control points</b>	C	<i>Category : TECHNICAL</i> <b>(647) European Union (29 Sep 2024 7:43 AM)</b> General comment on this section: it would be better to keep the same outline as for the ISPM 39 annex where the measures are included in a table with some explanations. The way it is actually presented here seems very poor in comparison to the ISPM 39 annex.
67	<b>2.3 Measures and critical control points</b>	C	<i>Category : TECHNICAL</i> <b>(412) EPPO (15 Sep 2024 5:49 PM)</b> General comment on this section: it would be better to keep the same outline as for the ISPM 39 annex where the measures are included in a table with some explanations. The way it is actually presented here seems very poor in comparison to the ISPM 39 annex.
67	<b>2.3 <del>Measures-Production practices</del> and <del>regulatory actions at</del> critical control points</b>	P	<i>Category : TECHNICAL</i> <b>(280) COSAVE (26 Aug 2024 2:09 AM)</b> For consistency with the content of the section

68	This section provides examples of the pest risk management options available to NPPOs and participating entities for potential inclusion as integrated measures in a systems approach. Further information can be found in section 1.5 of this annex and Appendix 2 of the core text of this standard.	C	<i>Category : EDITORIAL</i> <b>(818) Australia (30 Sep 2024 8:06 PM)</b> Reference to Section 1.5 of this Annex, which does not exist in the current draft.
68	This section provides examples of the pest risk management options available to NPPOs and participating entities for potential inclusion as integrated measures in a systems approach. Further information can be found in section 1.5 of this annex and Appendix 2 of the core text of this standard.	C	<i>Category : SUBSTANTIVE</i> <b>(783) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b> There is no 1.5
68	This section provides examples of the pest risk management options available to NPPOs and participating entities for potential inclusion as integrated measures in a systems approach. Further information can be found in section 1.5 of this annex and Appendix 2 of the core text of this standard.	P	<i>Category : SUBSTANTIVE</i> <b>(766) Korea, Republic of (30 Sep 2024 8:07 AM)</b> There is no section 1.5 in this annex, and in context it is assumed to refer to section 1.5 of the core text of this standard.
68	This section provides examples of the pest risk-management options-practices available to NPPOs and participating entities for potential inclusion as integrated measures in a systems approach. <del>Further information can be found in section 1.5, as well as examples of this annex and Appendix 2 of the core text of this standard.</del> regulatory actions.	P	<i>Category : SUBSTANTIVE</i> <b>(722) Mexico (29 Sep 2024 8:13 PM)</b> Correcting concepts, words and adding "regulatory actions". Deleting last sentence that mentions some section of ISPM 38, because it causes confusion.  Regulatory action or phytosanitary regulation terms are in ISPM5.
68	This section provides examples of the pest risk management options available to NPPOs <del>and participating entities</del> for potential inclusion as integrated measures in a systems approach. Further information can be found in section 1.5 of this annex and Appendix 2 of the core text of this standard. <u>To be included in the system approach, a measure should be clearly defined and contribute to objectives of the systems approach. The responsible NPPO should also be able to monitor conformity with the measures.</u>	P	<i>Category : SUBSTANTIVE</i> <b>(648) European Union (29 Sep 2024 7:45 AM)</b> 1) Simpler wording by removing reference to participating entities.  2) Section 1.5 of the core text of ISPM 38 is about "Pest management in seed production".  3) in the end, an important concept to be added.
68	This section provides examples of the pest risk management options available to NPPOs and participating entities for potential inclusion as integrated measures in a systems approach. Further information can be found in section 1.5 of this annex and Appendix 2 of the core text of this standard.	P	<i>Category : EDITORIAL</i> <b>(550) Japan (26 Sep 2024 6:27 AM)</b>
68	This section provides examples of the pest risk management options available to NPPOs and participating entities for potential inclusion as integrated measures in a systems approach. Further information can be found in section 1.5 of this annex and Appendix 2 of the core text of this standard.	C	<i>Category : EDITORIAL</i> <b>(530) Canada (20 Sep 2024 9:35 PM)</b> There is no section 1.5 in this document.
68	This section provides examples of the pest risk management options available to NPPOs <del>and participating entities</del> for potential inclusion as integrated measures in a	P	<i>Category : SUBSTANTIVE</i> <b>(413) EPPO (15 Sep 2024 5:49 PM)</b> 1) Simpler wording by removing reference to participating entities.

	systems approach. Further information can be found in section 1.5 <del>of this annex</del> and Appendix 2 of the core text of this standard. <u>To be included in the system approach, a measure should be clearly defined and contribute to objectives of the systems approach. The responsible NPPO should also be able to monitor conformity with the measures.</u>		2) Section 1.5 of the core text of ISPM 38 is about "Pest management in seed production".  3) in the end, an important concept to be added.
68	This section provides examples of the pest risk management options available to NPPOs and participating entities for potential inclusion as integrated measures in a systems approach. Further information can be found in section 1.5 of this annex and Appendix 2 of the core text of this standard.	C	<i>Category : TECHNICAL</i> <b>(367) New Zealand (11 Sep 2024 1:34 AM)</b> References are not correct. Section 1.5 of this annex does not exist and Appendix 2 to the core text is not relevant.
68	This section provides examples of <del>the pest risk management options</del> <u>production practices</u> available to NPPOs and participating entities for potential inclusion as integrated measures in a systems approach. <del>Further information can be found in section 1.5 of this annex and Appendix 2 of the core text of this standard.</del>	P	<i>Category : TECHNICAL</i> <b>(281) COSAVE (26 Aug 2024 2:13 AM)</b> There is no section 1.5 in this Annex and Appendix 2 of ISPM 38 refers to a Guidance on the likelihood of pest groups being carried and introduced with seeds
69	The effectiveness of production practices in reducing pest risk should be evaluated by NPPOs before including them as measures in a systems approach. National plant protection organizations are responsible for identifying the CCPs at which these measures may be applied. The number of CCPs may vary, depending on the seed <del>commodity</del> <u>species</u> .	P	<i>Category : EDITORIAL</i> <b>(723) Mexico (29 Sep 2024 8:14 PM)</b> Better wording
69	The effectiveness of production practices in reducing pest risk should be evaluated by NPPOs before including them as measures <u>(independent or dependent)</u> in a systems approach. National plant protection organizations are responsible for identifying the CCPs at which these measures may be applied. The number of CCPs may vary, depending on the seed commodity.	P	<i>Category : TECHNICAL</i> <b>(572) Canada (26 Sep 2024 10:42 PM)</b> A systems approach has to include at least two independent measures but it can also include dependent measures
69	The effectiveness of production practices in reducing pest risk should be evaluated by NPPOs before including them as measures in a systems approach. National plant protection organizations are responsible for identifying the CCPs at which these measures may be applied. The number of CCPs may vary, depending on the seed commodity.	C	<i>Category : TECHNICAL</i> <b>(486) United States of America (18 Sep 2024 5:00 PM)</b> There are two possible scenarios how a systems approach could be implemented. #1: If a seed is currently undergoing a market access process and the importing NPPO requires a specific SA that they design, then it would be exporting NPPO's responsibility, consistent with most other, non-seed, commodities and market access process. #2: The other scenario is where the exporting NPPOs collaborate with participating entities to incorporate their existing production/quality management together with HACCP mitigations. In the latter case, NPPO & entity will likely work together to outline CCPs and mitigations, with NPPO still having final say to approve the system. The Annex doesn't separate these two scenarios and as a result, it goes back and forth between statements that make sense in one scenario but not the other. For example, there are some statements that the NPPO identifies CCPs,

			designs the SA, and communicates requirements (makes sense for scenario #1); the other statements about voluntary alternative and collaboration between NPPO and the participating entity (makes sense for #2).
69	The effectiveness of production practices in reducing pest risk should be evaluated by NPPOs before including them as measures in a systems approach. National plant protection organizations are responsible for identifying the CCPs at which these measures may be applied. The number of CCPs may vary, depending on the seed commodity. <a href="#">Examples of CCPs can be found in Appendix 2 and section 1.5 of ISPM 38.</a>	P	<i>Category : TECHNICAL</i> <b>(368) New Zealand (11 Sep 2024 1:41 AM)</b> Add appropriate reference
69	The effectiveness of production practices in reducing pest risk should be evaluated by NPPOs before including them as measures in a systems <a href="#">approach and assessed against each pest that takes part in the systems</a> approach. National plant protection organizations are responsible for identifying the CCPs at which these measures may be applied. The number of CCPs may vary, depending on the seed <del>commodity</del> <a href="#">species</a> .	P	<i>Category : TECHNICAL</i> <b>(282) COSAVE (26 Aug 2024 2:15 AM)</b> Relevant information added
70	Example critical control points, and the associated regulatory actions and production practices that may reduce pest risk, are as follows:	C	<i>Category : SUBSTANTIVE</i> <b>(819) Australia (30 Sep 2024 8:07 PM)</b> Consider the inclusion, as applicable, of worker training and producer registration and training to all CCPs.
70	Example critical control points, and the associated regulatory actions and production practices that may reduce pest <del>risk</del> <a href="#">risk for seed commodities</a> , are as follows:	P	<i>Category : SUBSTANTIVE</i> <b>(808) Australia (30 Sep 2024 7:41 PM)</b> For clarity.
70	<del>Example critical control points</del> <a href="#">Examples of CCPs</a> , and the associated regulatory actions and production practices that may reduce pest risk, are as follows:	P	<i>Category : EDITORIAL</i> <b>(651) European Union (29 Sep 2024 7:48 AM)</b> 1) Better wording.  2) The abbreviation is explained in paragraph 46 and was already used for example in paragraph 69.
70	Example critical control points, and the associated regulatory actions and production practices that may reduce pest risk, are as follows:	C	<i>Category : TECHNICAL</i> <b>(650) European Union (29 Sep 2024 7:47 AM)</b> If Appendix 1 is not deleted (please see the comment made on paragraph 145), it should be referred to here because it reflects these CCPs. The wording of the text and Appendix 1 should be aligned (by modifying Appendix 1 according to section 2.3).
70	Example critical control points, and the associated regulatory actions and production practices that may reduce pest risk, are as follows:	C	<i>Category : TECHNICAL</i> <b>(649) European Union (29 Sep 2024 7:47 AM)</b> This section would be better presented as a table as for the wood standard We believe re-formatting is needed. See European Union comment on para 67.
70	Example critical control points, and the associated regulatory actions and	C	<i>Category : SUBSTANTIVE</i>

	production practices that may reduce pest risk, are as follows:		<b>(573) Canada (26 Sep 2024 10:49 PM)</b> There is a lot of overlap between this section and section 1.5 of ISPM 38.
70	Example critical control points, and the associated regulatory actions and production practices that may reduce pest risk, are as follows:	C	<i>Category : TECHNICAL</i> <b>(416) EPPO (15 Sep 2024 5:49 PM)</b> This section would be better presented as a table as for the wood standard We believe re-formatting is needed. See EPPO comment on para 67.
70	Example critical control points, and the associated regulatory actions and production practices that may reduce pest risk, are as follows:	C	<i>Category : TECHNICAL</i> <b>(415) EPPO (15 Sep 2024 5:49 PM)</b> If Appendix 1 is not deleted (please see the comment made on paragraph 145), it should be referred to here because it reflects these CCPs. The wording of the text and Appendix 1 should be aligned (by modifying Appendix 1 according to section 2.3).
70	<del>Example critical control points</del> <u>Examples of CCPs</u> , and the associated regulatory actions and production practices that may reduce pest risk, are as follows:	P	<i>Category : EDITORIAL</i> <b>(414) EPPO (15 Sep 2024 5:49 PM)</b> 1) Better wording.  2) The abbreviation is explained in paragraph 46 and was already used for example in paragraph 69.
70	Example critical control points, and the associated regulatory actions and production practices that may reduce pest risk, are as follows:	C	<i>Category : SUBSTANTIVE</i> <b>(369) New Zealand (11 Sep 2024 1:45 AM)</b> This section from para 70 to 94 as they are only examples which already appear in Appendix 1.
72	<i>regulatory actions</i> – surveillance to determine pest status, establishment of <del>a area</del> <u>of low pest free area prevalence</u> , <u>area</u> producer registration, review and approval of a system manual,	P	<i>Category : SUBSTANTIVE</i> <b>(784) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b>
72	<i>regulatory actions</i> <del>— surveillance to determine pest status, establishment establish the status of a pest free area, regulated pests included in the SA</del> producer <del>registration, review and approval site of a system manual</del> <u>production registration, evaluate the traceability system,</u> ,	P	<i>Category : SUBSTANTIVE</i> <b>(724) Mexico (29 Sep 2024 8:17 PM)</b> NPPO of exporting country required to define the status of the regulated pests to be included in the SA. If areas or sites free of some of the pests considered have been established in the production zone, this must be recognized by the NPPOs in accordance with the related ISPMs, but this is another phytosanitary measure for pest risk management, which is not required by the SA. The surveillance is a central activity of the NPPO.
72	<i>regulatory actions</i> – surveillance to determine pest status, establishment of a pest free area, <u>pest free place of production, pest free production site,</u> producer registration, review and approval of a system manual,	P	<i>Category : TECHNICAL</i> <b>(652) European Union (29 Sep 2024 7:52 AM)</b> More precise.
72	<i>regulatory actions</i> – surveillance to determine pest status, establishment of a pest free area, producer registration, review and approval of a system manual,	C	<i>Category : TECHNICAL</i> <b>(574) Canada (26 Sep 2024 10:51 PM)</b> This is a level of ambiguity associated with the term "regulatory actions". Suggest the use of a term that is used in ISPM 38 or in ISPM 5. Some of terminology is very nuanced and may not be clear for the reader e.g. Growing-season inspection versus growing-season examination

72	<i>regulatory actions</i> – surveillance to determine pest status, establishment of a pest free area, <u>pest free place of production, pest free production site</u> producer registration, review and approval of a system manual,	P	Category : <i>TECHNICAL</i> <b>(417) EPPO (15 Sep 2024 5:49 PM)</b> More precise.
72	<i>regulatory actions</i> – surveillance to determine pest status, establishment of a pest free area, <u>pest free place of production or production site</u> , producer registration, review and approval of a system manual, <u>developed by the entity which describes the pest management plan and including relevant information on production practices and operation systems included in the systems approach.</u>	P	Category : <i>TECHNICAL</i> <b>(370) New Zealand (11 Sep 2024 1:52 AM)</b> The concept of a system manual is newly introduced here. NZ suggests this wording to explain what the systems manual includes. This mirrors the wording for ISPM 36 and links the system manual to "pest management plan".
72	<i>regulatory actions</i> – surveillance to determine pest status, <del>establishment of a pest free area</del> , producer <u>and site of production</u> registration, review and approval of a system manual,	P	Category : <i>SUBSTANTIVE</i> <b>(283) COSAVE (26 Aug 2024 2:19 AM)</b> The establishment of a PFA should not be a regulatory action. If a PFA is established in the area for a QP included in the SA, such area should be recognized according ISPM 4. The action is to determine the pest status in the area. The registration of sites of production is also relevant
73	<i>production practices</i> – use of <del>pest free area, pest free places of production or pest free production sites</del> , use of buffer zones around growing sites, <u>establishment of area of low pest prevalence</u> , use of pest exclusion (e.g. greenhouse, screenhouse), use of crop rotation, removal of potential host, use of tested or clean water sources, maintenance of documentation, production of a system manual;	P	Category : <i>SUBSTANTIVE</i> <b>(785) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b>
73	<i>production practices</i> – <del>use of pest free area</del> <u>field selection</u> , <del>pest free places of production or pest free production sites</del> <u>geographic isolation, roguing</u> , use of buffer zones around growing sites, use of pest exclusion (e.g. greenhouse, screenhouse), <u>soil or growing medium treatment</u> , use of crop rotation, removal of potential host, use of tested or clean water sources, maintenance of documentation, <del>production of a system manual</del> ;	P	Category : <i>SUBSTANTIVE</i> <b>(725) Mexico (29 Sep 2024 8:21 PM)</b> Adding common practices mentioned in ISPM38, deleting PFA and SFA idem paragraph 72
73	<i>production practices</i> – use of pest free area, pest free places of production or pest free production sites, use of buffer zones around <u>growing sites</u> , use of pest exclusion (e.g. greenhouse, screenhouse), use of crop rotation, removal of potential host, use of tested or clean water sources, maintenance of documentation, production of a system manual;	C	Category : <i>TECHNICAL</i> <b>(654) European Union (29 Sep 2024 7:56 AM)</b> Why not "places of production" or "production sites"?
73	<i>production practices</i> – use of pest free <del>area</del> <u>areas</u> , pest free places of production or pest free production sites, use of buffer zones around growing sites, <u>soil testing</u> , use of pest <del>or vector</del> exclusion (e.g. greenhouse, screenhouse), use of crop rotation, removal of potential <del>host</del> <u>hosts</u> , use of tested or clean water sources, maintenance of documentation, <u>production development</u> of a system manual;	P	Category : <i>EDITORIAL</i> <b>(653) European Union (29 Sep 2024 7:55 AM)</b> 'use of pest free area' should be plural 'areas'. Other useful additions and better wording. "hosts" in plural seems more appropriate.
73	<i>production practices</i> – use of pest free area, pest free places of production or pest	P	Category : <i>TECHNICAL</i>

	free production sites, use of buffer zones around growing sites, use of pest exclusion (e.g. greenhouse, screenhouse), use of crop rotation, removal of potential host, use of tested or clean water sources, maintenance of documentation, production of a system manual, <u>use of clean agricultural tools alone</u> ;		<b>(630) China (29 Sep 2024 5:13 AM)</b> Agricultural tools can be a way to spread the virus. the requirements for agricultural tools, requiring the , to avoid the cross use of agricultural tools with other cultivated varieties.
73	<i>production practices</i> – use of pest free area, pest free places of production or pest free production sites, use of buffer zones around growing sites, use of pest exclusion (e.g. greenhouse, screenhouse), use of crop rotation, removal of potential host, use of tested or clean water sources, maintenance of documentation, production of a system manual;	C	<i>Category : TECHNICAL</i> <b>(487) United States of America (18 Sep 2024 5:05 PM)</b> Use of a pest free area (PFA) likely will not be possible where pests of phytosanitary concern are endemic/established. It would be very difficult to meet the criteria in ISPM 4. It needs to be pointed out that PFA, PFPP, PFPS, etc. are measures often required by NPPOs as tactics to manage phytosanitary risk. Systems approaches/QM practices used in the seed industry may likely be equivalent to these tactics, which should be considered during the accreditation process.
73	<i>production practices</i> – use of pest free <del>area</del> <u>areas</u> , pest free places of production or pest free production sites, use of buffer zones around growing sites, <u>soil testing</u> , use of pest <u>or vector</u> exclusion (e.g. greenhouse, screenhouse), use of crop rotation, removal of potential <del>host</del> <u>hosts</u> , use of tested or clean water sources, maintenance of documentation, <u>production-development</u> of a system manual;	P	<i>Category : EDITORIAL</i> <b>(418) EPPO (15 Sep 2024 5:49 PM)</b> 'use of pest free area' should be plural 'areas'. Other useful additions and better wording. "hosts" in plural seems more appropriate.
73	<i>production practices</i> – use of pest free area, pest free places of production or pest free production sites, use of buffer zones around <u>growing sites</u> , use of pest exclusion (e.g. greenhouse, screenhouse), use of crop rotation, removal of potential host, use of tested or clean water sources, maintenance of documentation, production of a system manual;	C	<i>Category : TECHNICAL</i> <b>(419) EPPO (15 Sep 2024 5:49 PM)</b> Why not "places of production" or "production sites"?
73	<i>production practices</i> – <del>use-selection</del> of <del>pest-free-area</del> <u>the field</u> , <del>pest-free-places-of-production-or-pest-free-production-sites</del> <u>rouging</u> , use of buffer zones around growing sites, use of pest exclusion (e.g. greenhouse, screenhouse), use of crop rotation, <u>soil and growing media treatment</u> , removal of potential host, use of tested or clean water sources, maintenance of documentation, production of a system manual;	P	<i>Category : TECHNICAL</i> <b>(284) COSAVE (26 Aug 2024 2:24 AM)</b> The production practice would be the selection of a field where the pest is absent. Relevant examples added
74	pre-planting – seed <del>and plant</del> inputs:	P	<i>Category : SUBSTANTIVE</i> <b>(726) Mexico (29 Sep 2024 8:22 PM)</b> Only seed, since the transplant mentioned in 75 is part of the whole production process.
75	<i>regulatory actions</i> – <del>Review information about seed origin. approval of testing facilities and certification programmes, certification of transplant facilities;</del>	P	<i>Category : TECHNICAL</i> <b>(727) Mexico (29 Sep 2024 8:24 PM)</b> To include
75	<i>regulatory actions</i> – approval <u>and audits by the NPPO</u> , of testing <u>facilities and certification programmes</u> <u>facilities</u> , certification <del>of programmes and</del> transplant	P	<i>Category : TECHNICAL</i> <b>(655) European Union (29 Sep 2024 7:58 AM)</b> What is meant here? Replace "certification" with "approval"? ("approval" is

	facilities,		used in the first line of this paragraph for testing facilities and "approved by the NPPO" is used in ISPM 15 for treatment providers.)
75	<i>regulatory actions</i> – approval of testing facilities and certification programmes, certification of transplant facilities,	C	Category : <i>TECHNICAL</i> <b>(575) Canada (26 Sep 2024 11:00 PM)</b> It may not be necessary to authorize all entities operating under the purview of an authorized entity
75	<i>regulatory actions</i> – approval of testing facilities and certification programmes, certification of transplant facilities,	C	Category : <i>TECHNICAL</i> <b>(488) United States of America (18 Sep 2024 5:07 PM)</b> Hopefully, recognition of transplant facilities, laboratories, etc. could be accomplished as part of the accreditation process for a given entity and not done separately as this could add significant time and resources. If a third party facility gets recognized during accreditation of a given company's SA program, recognition of such facilities used by others should likewise apply.
75	<i>regulatory actions</i> – approval <u>and audits by the NPPO</u> of testing <u>facilities and certification programmes</u> <u>facilities</u> , certification <u>of programmes and</u> transplant facilities,	P	Category : <i>TECHNICAL</i> <b>(420) EPPO (15 Sep 2024 5:49 PM)</b> What is meant here? Replace "certification" with "approval"? ("approval" is used in the first line of this paragraph for testing facilities and "approved by the NPPO" is used in ISPM 15 for treatment providers.)
76	<i>production practices</i> – use of tested or certified seed, application of transplant sanitation, use of <u>plant varieties that reduce risk of seed transmission of pests (e.g. resistant or less susceptible cultivars varieties (section 1.5.2 of the core text of this standard))</u> , use of seed treatments, maintenance of documentation;	P	Category : <i>SUBSTANTIVE</i> <b>(520) Japan (20 Sep 2024 12:17 PM)</b> For varieties to be used as production practices in systems approach, it is important that they have characteristics to reduce the risk of seed transmission, regardless of having resistance or the level of susceptibility.
76	<i>production practices</i> – use <del>of healthy planting material (e.g. tested or certified seedseed)</del> , <del>application of transplant sanitation</del> , use of resistant or less susceptible cultivars, use of seed treatments, maintenance of documentation;	P	Category : <i>SUBSTANTIVE</i> <b>(728) Mexico (29 Sep 2024 8:28 PM)</b> Healthy planting material: Term used in ISPM 38, more general term, not only by testing or certified seed, it is possible to know the presence of the pests regulated in the SA, in the seed to be sowed.  In preplanting related to seed to be used, NPPO needs the information of the origin of the seed in relation to the pests included in the SA. First it is necessary to determine if it is necessary to test the seed, then according to what the NPPO determines it can authorize laboratories or use the company's own lab.
76	<i>production practices</i> – use of tested or certified <u>seedseeds</u> , application of transplant sanitation, use of resistant or less susceptible cultivars, use of seed treatments, maintenance of documentation;	P	Category : <i>EDITORIAL</i> <b>(656) European Union (29 Sep 2024 8:00 AM)</b> "seeds" in plural seems more appropriate.
76	<i>production practices</i> – use of tested or certified <u>seedseeds</u> , application of transplant sanitation, use of resistant or less susceptible cultivars, use of seed treatments, maintenance of documentation;	P	Category : <i>EDITORIAL</i> <b>(421) EPPO (15 Sep 2024 5:49 PM)</b> "seeds" in plural seems more appropriate.
76	<i>production practices</i> – use of tested or certified seed, application of transplant sanitation, use of resistant or less susceptible <u>cultivars varieties</u> , use of seed	P	Category : <i>TECHNICAL</i> <b>(371) New Zealand (11 Sep 2024 1:53 AM)</b> In the seed trade and regulatory space "variety" is the preferred term rather

	treatments, maintenance of documentation;		than "cultivar".
76	<i>production practices</i> – use of <del>tested or certified healthy</del> seed, application of transplant sanitation, use of resistant or less susceptible cultivars, use of seed treatments, maintenance of documentation;	P	Category : TECHNICAL <b>(285) COSAVE (26 Aug 2024 2:25 AM)</b> For consistency with core text of ISPM 38. Furthermore testing is not always conducted and certified can bring confusion to the certified seed used in seed production
78	<i>regulatory actions</i> – <del>growing-season inspection, audits of facilities or review of their records,</del> <u>field inspection at growing-season, audits of facilities or review of their records,</u>	P	Category : SUBSTANTIVE <b>(767) Korea, Republic of (30 Sep 2024 8:14 AM)</b> To consistency with para 81, field inspection at harvest.
78	<i>regulatory actions</i> – growing-season inspection, <u>or audit and, where appropriate, sampling and testing if symptoms are observed, inspection or</u> audits of facilities <u>(greenhouse or screenhouse) or</u> review <del>of their pest management</del> records,	P	Category : SUBSTANTIVE <b>(729) Mexico (29 Sep 2024 8:31 PM)</b> Adding some actions that are common.
78	<i>regulatory actions</i> – growing-season inspection, <u>approval and</u> audits of <u>production</u> facilities or review of their records, <u>approval and audits of certification programmes</u>	P	Category : TECHNICAL <b>(657) European Union (29 Sep 2024 8:03 AM)</b> Useful additions and clarity improved.
78	<i>regulatory actions</i> – growing-season inspection, <u>approval and</u> audits of <u>production</u> facilities or review of their records, <u>approval and audits of certification programmes</u>	P	Category : TECHNICAL <b>(422) EPPO (15 Sep 2024 5:49 PM)</b> Useful additions and clarity improved.
78	<i>regulatory actions</i> – <del>fieldgrowing-season inspection</del> <u>inspection during growing period</u> , audits of facilities or review of their records,	P	Category : TECHNICAL <b>(286) COSAVE (26 Aug 2024 2:27 AM)</b> Use field inspection and the Glossary term growing period
79	<i>production practices</i> – growing-season examination of plants, <u>roguing</u> , growing-season <del>treatments or</del> pest management, plant sampling <del>or testing</del> <u>and testing (if symptoms are observed)</u> , application of growing-site sanitation, worker training, maintenance of documentation;	P	Category : SUBSTANTIVE <b>(730) Mexico (29 Sep 2024 8:34 PM)</b> Improving text
79	<i>production practices</i> – growing-season examination of plants, growing-season treatments or pest management, plant sampling <del>or for</del> testing, application of growing-site sanitation, <u>sanitation of equipment before use in different fields</u> , worker training, maintenance of documentation;	P	Category : TECHNICAL <b>(658) European Union (29 Sep 2024 8:04 AM)</b> 1) Plant sampling for what? For testing.  2) In paragraph 82 disinfection of equipment is separated. Should it be the same here? See text proposal.
79	<i>production practices</i> – growing-season examination of plants, growing-season treatments or pest management, plant sampling or testing, application of growing-site sanitation, worker training, maintenance of documentation;	C	Category : TECHNICAL <b>(576) Canada (26 Sep 2024 11:06 PM)</b> Worker training applies to all all stages of productions practices.
79	<i>production practices</i> – growing-season <del>examination inspection</del> of plants, growing-season treatments or pest management, plant sampling or testing, application of	P	Category : EDITORIAL <b>(537) Canada (20 Sep 2024 9:57 PM)</b>

	growing-site sanitation, worker training, maintenance of documentation;		
79	<i>production practices</i> – growing-season examination of plants, growing-season treatments or pest management, plant sampling <del>or for</del> testing, application of growing-site sanitation, <u>sanitation of equipment before use in different fields</u> , worker training, maintenance of documentation;	P	Category : TECHNICAL <b>(423) EPPO (15 Sep 2024 5:49 PM)</b> 1) Plant sampling for what? For testing.  2) In paragraph 82 disinfection of equipment is separated. Should it be the same here? See text proposal.
79	<i>production practices</i> – <del>growing-season-growing-period</del> examination of plants, <del>growing-season-rouging, growing-period</del> treatments or pest management, plant sampling or testing, application of growing-site sanitation, worker training, maintenance of documentation;	P	Category : TECHNICAL <b>(287) COSAVE (26 Aug 2024 2:29 AM)</b> Use the Glossary term growing period
81	<i>regulatory actions</i> – <del>Review reported harvest dates and evaluate the need for inspection—field inspection at harvest, testing if appropriate,</del>	P	Category : SUBSTANTIVE <b>(731) Mexico (29 Sep 2024 8:37 PM)</b> At harvest, no mandatory inspection is required as a risk mitigation measure. The NPPO should know the starting date of the estimated harvest period. If NPPO decides to inspect at random, it will do so. Recommendations for harvesting, based on the pests included, will be indicated in the approved SA document if necessary.
81	<i>regulatory actions</i> – field inspection at harvest, testing if appropriate, <u>approval and audit of certification programmes</u>	P	Category : TECHNICAL <b>(659) European Union (29 Sep 2024 8:06 AM)</b> Useful addition.
81	<i>regulatory actions</i> – field inspection at harvest, testing if appropriate, <u>approval and audit of certification programmes</u>	P	Category : TECHNICAL <b>(424) EPPO (15 Sep 2024 5:49 PM)</b> Useful addition.
82	<i>production practices</i> – disinfection of equipment before use in different fields or on different harvest dates, avoiding the harvest of seeds from sick unhealthy plants, use of harvest windows to avoid infestation, application of sanitation, maintenance of documentation;	C	Category : EDITORIAL <b>(820) Australia (30 Sep 2024 8:13 PM)</b> Either word, sick or unhealthy, would suffice here.
82	<i>production practices</i> – disinfection of equipment before use in different fields or on different harvest dates, avoiding the harvest of seeds from <del>sick-unhealthy</del> <u>or infested</u> plants, use of harvest windows to avoid infestation, application of sanitation, maintenance of documentation;	P	Category : TECHNICAL <b>(787) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b>
82	<i>production practices</i> – disinfection of equipment before use in different fields or on different harvest dates, avoiding the harvest of seeds from sick unhealthy plants, use of harvest windows to avoid infestation, application of sanitation, maintenance of documentation;	C	Category : EDITORIAL <b>(786) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b> Removal of sick as unhealthy plants will suffice.
82	<i>production practices</i> – disinfection of equipment before use in different fields or on different harvest dates, avoiding the harvest of seeds from <del>sick-unhealthy-diseased</del> plants, use of harvest windows to avoid infestation, <u>choosing harvest technology to</u>	P	Category : TECHNICAL <b>(660) European Union (29 Sep 2024 8:08 AM)</b> Or "infested or unhealthy plants".

	<a href="#">avoid infestation e.g. due to soil contact</a> , application of sanitation, maintenance of documentation;		Useful addition.
82	<i>production practices</i> – disinfection of equipment before use in different fields or on different harvest dates, avoiding the harvest of seeds from <del>sick-unhealthy-diseased</del> plants, use of harvest windows to avoid infestation, <a href="#">choosing harvest technology to avoid infestation e.g. due to soil contact</a> , application of sanitation, maintenance of documentation;	P	Category : TECHNICAL <b>(425) EPPO (15 Sep 2024 5:49 PM)</b> Or "infested or unhealthy plants".  Useful addition.
82	<i>production practices</i> – disinfection of equipment before use in different fields or on different harvest dates, avoiding the harvest of seeds from <del>sick-unhealthy</del> plants, use of harvest windows to avoid infestation, application of sanitation, maintenance of documentation;	P	Category : TECHNICAL <b>(288) COSAVE (26 Aug 2024 2:30 AM)</b> Redundant
83	post-harvest – <del>conditioning and treatment</del> : <a href="#">handling</a>	P	Category : SUBSTANTIVE <b>(732) Mexico (29 Sep 2024 8:40 PM)</b> Better wording
83	post-harvest – <del>conditioning and treatment</del> <a href="#">handling</a> :	P	Category : TECHNICAL <b>(289) COSAVE (26 Aug 2024 2:31 AM)</b> Term used in ISPM 38 to cover conditioning and treatment
84	<i>regulatory actions</i> – audits of operational facilities, <a href="#">if required</a> , verification of the <del>efficacy of treatments</del> , <a href="#">process, records</a> .	P	Category : SUBSTANTIVE <b>(733) Mexico (29 Sep 2024 8:42 PM)</b> Term used in ISPM 38 ( conditioning, drying, sorting, cleaning, treatment). Verification of the efficacy of treatments does not correspond in a SA process. It should be addressed previously.
84	<i>regulatory actions</i> – <a href="#">approval and</a> audits of <del>operational</del> <a href="#">conditioning and treatment</a> facilities, verification of the efficacy of treatments, <del>approval and audits of</del> <a href="#">certification programmes</a>	P	Category : TECHNICAL <b>(661) European Union (29 Sep 2024 8:11 AM)</b> 1) and 3) Useful additions  2) More precise wording (see paragraph 83).
84	<i>regulatory actions</i> – <del>audits of operational facilities, verification of the efficacy of treatments</del> , <a href="#">approval and audits of conditioning and treatment facilities, verification of the efficacy of treatments, approval and audits of certification programmes</a>	P	Category : TECHNICAL <b>(426) EPPO (15 Sep 2024 5:49 PM)</b> 1) and 3) Useful additions  2) More precise wording (see paragraph 83).
84	<i>regulatory actions</i> – audits of operational facilities, verification of <del>the efficacy of treatments</del> <a href="#">handling processes</a> ,	P	Category : TECHNICAL <b>(290) COSAVE (26 Aug 2024 2:32 AM)</b> The regulatory action is to verify the application of the treatment but not to verify its efficacy
85	<i>production practices</i> – <a href="#">fermentation to reduce seed residues</a> , washing seeds to reduce the microbial contaminant load, application of seed treatments (e.g. heat, hot water, pesticide) upon receipt, milling and sorting to reduce contaminants on plants and dead seeds, application of sanitation, and maintenance of	C	Category : SUBSTANTIVE <b>(825) Australia (30 Sep 2024 8:27 PM)</b> It is unclear how fermentation reduces seed residues, or what those residues are in relation to plant pests

	documentation;		
85	<i>production practices</i> – fermentation to reduce seed residues, washing seeds to reduce the microbial contaminant load, application of seed treatments (e.g. heat, hot water, pesticide) upon receipt, <del>milling and</del> sorting to reduce contaminants on plants and dead seeds, application of sanitation, and maintenance of documentation;	P	<i>Category : TECHNICAL</i> <b>(788) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b>
85	<i>production practices</i> – fermentation to reduce seed residues, washing seeds to reduce the microbial contaminant load, application of seed <del>treatments (e.g. heat, hot water, pesticide) upon receipt,</del> milling and sorting to reduce contaminants on plants and dead seeds, application of sanitation, and maintenance of documentation;	P	<i>Category : SUBSTANTIVE</i> <b>(735) Mexico (29 Sep 2024 8:58 PM)</b> NPPOs are well aware of seed treatments, and it is therefore not necessary to give examples.
85	<i>production practices</i> – fermentation to reduce seed residues, washing seeds to reduce the microbial contaminant load, application of seed treatments (e.g. heat, hot water, <del>pesticide</del> ) <del>pesticide, fungicide</del> upon receipt, milling and sorting to reduce contaminants on plants and dead seeds, application of sanitation, and maintenance of documentation;	P	<i>Category : TECHNICAL</i> <b>(631) China (29 Sep 2024 5:13 AM)</b> Seeds are often treated with fungicides.
85	<i>production practices</i> – fermentation to reduce seed residues, washing seeds to reduce the microbial contaminant load, application of seed treatments (e.g. heat, hot water, pesticide) upon receipt, <u>milling and sorting to reduce contaminants on plants and dead seeds</u> , application of sanitation, and maintenance of documentation;	C	<i>Category : TECHNICAL</i> <b>(531) Canada (20 Sep 2024 9:37 PM)</b> This phrase is confusing. Milling can reduce contaminants on seeds (not plants) and sorting can be used to remove dead, broken, deformed seeds, etc. Depending on the intent, potentially remove “on plants” or use the same wording as used in Appendix 1.
85	<i>production practices</i> – fermentation to reduce seed residues, washing seeds to reduce the microbial contaminant load, application of seed treatments (e.g. heat, hot water, pesticide) upon receipt, milling and sorting to reduce contaminants <del>on</del> <u>plants such as plant debris</u> and dead seeds, application of sanitation, and maintenance of documentation;	P	<i>Category : TECHNICAL</i> <b>(372) New Zealand (11 Sep 2024 1:54 AM)</b> Suggest rephrasing to capture that the risk from dead seeds and plant debris can be removed by milling and sorting
86	post-harvest – handling and storage:	C	<i>Category : TECHNICAL</i> <b>(489) United States of America (18 Sep 2024 5:09 PM)</b> Current phytosanitary management practices may be sufficient here and could easily be incorporated into a SA where appropriate.
86	post-harvest – <del>handling and</del> storage:	P	<i>Category : TECHNICAL</i> <b>(291) COSAVE (26 Aug 2024 2:33 AM)</b> For consistency
87	<i>regulatory actions</i> – facility audits and <del>inspections,</del> <u>inspections if required and verification of traceability</u>	P	<i>Category : SUBSTANTIVE</i> <b>(740) Mexico (29 Sep 2024 9:10 PM)</b> “If required” was added, because it will depend on the seed species and the regulated pests, where conditioning can help to reduce the risk of pests. E.g.

			contaminants such as weeds. The verification of the efficacy of a seed treatment is deleted, because it does not correspond in an SA, it is a previous issue.
87	regulatory actions – facility <a href="#">approval</a> , audits and inspections, <a href="#">approval and audits of certification programmes</a>	P	Category : TECHNICAL <b>(662) European Union (29 Sep 2024 8:12 AM)</b> Useful additions.
87	regulatory actions – facility <a href="#">approval</a> , audits and inspections, <a href="#">approval and audits of certification programmes</a>	P	Category : TECHNICAL <b>(427) EPPO (15 Sep 2024 5:49 PM)</b> Useful additions.
87	regulatory actions – facility audits and inspections, <a href="#">verification of traceability</a>	P	Category : TECHNICAL <b>(292) COSAVE (26 Aug 2024 2:35 AM)</b> A relevant regulatory action added
88	production practices – storage of seeds with safeguards to prevent <a href="#">infestation</a> , <a href="#">storage of seeds to their infestation and</a> maintain their health and identity, implementation of protocols to prevent the mixing of seed <a href="#">lots (cleaning lots, cleaning of equipment) equipment</a> , sealing of packaging to exclude pests, application of sanitation, maintenance of documentation;	P	Category : EDITORIAL <b>(663) European Union (29 Sep 2024 8:15 AM)</b> Editorial suggestions.
88	production practices – storage of seeds with safeguards to prevent infestation, storage of seeds to maintain their health and identity, implementation of protocols to prevent the mixing of seed lots (cleaning of <a href="#">equipment) equipment</a> , <a href="#">label clearly, store solely</a> ), sealing of packaging to exclude pests, application of sanitation, maintenance of documentation;	P	Category : TECHNICAL <b>(632) China (29 Sep 2024 5:14 AM)</b> Measures to prevent seed mixing include clear labeling and store solely.
88	production practices – storage of seeds with safeguards to prevent infestation, storage of seeds to maintain their health and identity, implementation of protocols to prevent the mixing of seed lots (cleaning of equipment), sealing of packaging to exclude pests, <a href="#">application of sanitation, maintenance of documentation</a> ;	C	Category : TECHNICAL <b>(532) Canada (20 Sep 2024 9:39 PM)</b> Seed cleaning to remove weed seeds and foreign material is not specifically mentioned in this annex. Would seed cleaning be covered under “sanitation”? If not, consider adding a specific reference to seed cleaning, which is an important post-harvest production practice to reduce weed seed contaminants. If it is covered, suggest including a definition or explanation of “sanitation” and the types of activities it includes (some examples of sanitation are provided in ISPM 38 but do not include seed cleaning).
88	production practices – storage of seeds with safeguards to prevent <a href="#">infestation</a> , <a href="#">storage of seeds to their infestation and</a> maintain their health and identity, implementation of protocols to prevent the mixing of seed <a href="#">lots (cleaning lots, cleaning of equipment) equipment</a> , sealing of packaging to exclude pests, application of sanitation, maintenance of documentation;	P	Category : EDITORIAL <b>(428) EPPO (15 Sep 2024 5:49 PM)</b> Editorial suggestions.
88	production practices – storage of seeds with safeguards to prevent infestation, storage of seeds to <a href="#">maintain their health ensure they are healthy</a> and <a href="#">maintain</a> identity, implementation of protocols to prevent the mixing of seed lots (cleaning	P	Category : TECHNICAL <b>(373) New Zealand (11 Sep 2024 1:57 AM)</b> To clarify that maintaining identity of seeds in storage is important for risk management.

	of equipment), sealing of packaging to exclude pests, application of sanitation, maintenance of documentation;		
89	post-harvest – seed <del>quality</del> testing:	P	Category : <i>TECHNICAL</i> <b>(789) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b>
89	post-harvest – <del>seed quality</del> <u>seed</u> testing:	P	Category : <i>SUBSTANTIVE</i> <b>(768) Korea, Republic of (30 Sep 2024 8:15 AM)</b> Seed quality testing includes seed germination rate, seed viability, etc., but APQA don't think these are related to managing pest risk.
89	<del>post harvest – seed quality testing:</del>	P	Category : <i>SUBSTANTIVE</i> <b>(737) Mexico (29 Sep 2024 9:07 PM)</b> Quality testing is used to evaluate parameters such as germination, vigor, etc., and is not included in the SA.
89	post-harvest – seed <u>quality health</u> testing:	P	Category : <i>SUBSTANTIVE</i> <b>(664) European Union (29 Sep 2024 8:16 AM)</b> Seed quality is not part of phytosanitary actions. A systems approach is meant for mitigation of phytosanitary measures.
89	post-harvest – seed <u>quality health</u> testing:	P	Category : <i>SUBSTANTIVE</i> <b>(429) EPPO (15 Sep 2024 5:49 PM)</b> Seed quality is not part of phytosanitary actions. A systems approach is meant for mitigation of phytosanitary measures.
89	post-harvest – seed <del>quality</del> testing:	P	Category : <i>TECHNICAL</i> <b>(293) COSAVE (26 Aug 2024 2:37 AM)</b> Regulatory actions do not apply for quality seed testing
90	<del>regulatory actions – approval of testing facilities, approval or validation of sampling protocols, proficiency testing,</del>	P	Category : <i>SUBSTANTIVE</i> <b>(739) Mexico (29 Sep 2024 9:08 PM)</b> Quality testing is used to evaluate parameters such as germination, vigor, etc., and is not included in the SA.
90	regulatory actions – approval <u>and audit</u> of testing facilities, approval or validation of sampling protocols, proficiency testing, <u>approval and audit of certification programmes</u>	P	Category : <i>TECHNICAL</i> <b>(665) European Union (29 Sep 2024 8:18 AM)</b> Useful additions.
90	regulatory actions – approval <u>and audit</u> of testing facilities, approval or validation of sampling protocols, proficiency testing, <u>approval and audit of certification programmes</u>	P	Category : <i>TECHNICAL</i> <b>(430) EPPO (15 Sep 2024 5:49 PM)</b> Useful additions.
91	<del>production practices – use of NPPO approved sampling protocols, use of approved testing facilities, use of approved testing protocols, application of sanitation, maintenance of documentation; and</del>	P	Category : <i>SUBSTANTIVE</i> <b>(738) Mexico (29 Sep 2024 9:07 PM)</b> Quality testing is used to evaluate parameters such as germination, vigor, etc., and is not included in the SA.
93	regulatory actions – establishment of phytosanitary import requirements, audit or testing at import, post-entry quarantine, phytosanitary certification, <u>trace-back</u>	P	Category : <i>SUBSTANTIVE</i> <b>(790) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b>

93	<i>regulatory actions</i> – <del>establishment of phytosanitary import requirements, audit or testing at import, post-entry quarantine,</del> phytosanitary certification, <u>traceability verification</u>	P	Category : <i>SUBSTANTIVE</i> <b>(736) Mexico (29 Sep 2024 9:06 PM)</b> What is written here does not correspond to the distribution and transportation step. This stage only includes the verification of traceability and the issue of Phytosanitary Certificate for export or reexport.
93	<i>regulatory actions</i> – <del>establishment of phytosanitary import requirements</del> <u>traceability verification</u> , <del>audit or testing at import, post-entry quarantine,</del> phytosanitary certification,	P	Category : <i>TECHNICAL</i> <b>(294) COSAVE (26 Aug 2024 2:39 AM)</b> Text deleted does not correspond to the distribution and transportation step. At this step it is relevant to include the verification of traceability and phytosanitary certification
93	<i>regulatory actions</i> – establishment of phytosanitary import requirements, audit or testing at import, post-entry quarantine, phytosanitary certification,	C	Category : <i>SUBSTANTIVE</i> <b>(248) Thailand (19 Aug 2024 6:54 AM)</b> We would like to seek more clarification on the actions that could not done by NPPO of the country-of-origin, such as post entry quarantine and audit or testing at import. Could these measures be included in the systems approaches?
94	<i>production practices</i> – labelling to enable trace-back, application of sanitation (e.g. to ensure that conveyances are free from contamination), <del>use of approved testing protocols,</del> maintenance of documentation.	P	Category : <i>TECHNICAL</i> <b>(666) European Union (29 Sep 2024 8:19 AM)</b> 'use of approved testing protocols' during distribution and transport? Better to delete.
94	<i>production practices</i> – labelling to enable trace-back, application of sanitation (e.g. to ensure that conveyances are free from contamination), <del>use of approved testing protocols,</del> maintenance of documentation.	P	Category : <i>TECHNICAL</i> <b>(431) EPPO (15 Sep 2024 5:49 PM)</b> 'use of approved testing protocols' during distribution and transport? Better to delete.
95	<b>2.4. Issuance of phytosanitary certificates</b>	P	Category : <i>SUBSTANTIVE</i> <b>(741) Mexico (29 Sep 2024 9:12 PM)</b> Delete this section The text is not correct and the place in the annex is confusing, on the other hand it is not necessary, it will be determined in the draft SA proposal.
95	<b>2.4. <u>Additional declarations on</u>Issuance of phytosanitary certificates</b>	P	Category : <i>TECHNICAL</i> <b>(538) Canada (20 Sep 2024 10:01 PM)</b> The text under section 2.4 provides guidance on additional declarations on PC
95	<b>2.4. Issuance of phytosanitary certificates</b>	C	Category : <i>TECHNICAL</i> <b>(490) United States of America (18 Sep 2024 5:14 PM)</b> Instead of an additional declaration, the facility/offshore operation would need to be certified. A new wording is needed to indicate that a systems approach can be used in additional declaration in support of certification of a facility by NPPO. E.g., the seed is produced in a facility that is being approved by the NPPO under xx program using a systems approach. The systems approach is used in multiple markets but we never state this in AD, because without a certification of the facilities by the NPPO, it's just a mitigation practice that does not substitute PC - it compliments a PC. Otherwise, NPPOs would have hard time to agree on this concept.

96	A systems approach is a combination of measures and, depending on the phytosanitary import requirements, it may be indicated on a phytosanitary certificate as an additional declaration in accordance with ISPM 12.	C	<p><i>Category : SUBSTANTIVE</i>  <b>(824) Australia (30 Sep 2024 8:25 PM)</b>  It is unclear here how requirements across multiple countries are managed.</p>
96	A systems approach is a combination of measures and, depending on the phytosanitary import requirements, it may be indicated on a phytosanitary certificate as an additional declaration in accordance with ISPM 12.	C	<p><i>Category : SUBSTANTIVE</i>  <b>(805) Nepal (30 Sep 2024 3:53 PM)</b>  In countries with rich biodiversity, such as Nepal, the risk of infestation by polyphagous pests targeting individual seed species is significantly heightened. Therefore, a more generic wording in the additional declaration may not be technically justified as a comprehensive safeguard. The importance of specifically listing individual pests in the additional declaration should not be overlooked, as the risks associated with pest escape cannot be fully mitigated by any administrative or phytosanitary system alone.</p> <p>While general considerations may be applied as part of broader risk management strategies, this should only be considered as an added component when the National Plant Protection Organization (NPPO) of the importing country conducts an extensive audit of the exporting country's pest management system beforehand. Without such an audit, reliance on general wording alone in the additional declaration is insufficient.</p> <p>A robust approach, which includes the listing of specific pests, is critical in ensuring that the risk of pest escape is minimized and that no gaps in phytosanitary control are left unaddressed. The inherent complexities of polyphagous pest behavior and the diverse ecological environments in biodiverse countries necessitate this level of specificity to ensure adequate protection against pest introduction.</p>
96	A systems approach is a combination of measures and, depending on the phytosanitary import requirements, it may be indicated on a phytosanitary certificate as an additional declaration in accordance with ISPM 12. <u>If systems approaches are developed for pest groups, NPPOs should allow additional declarations (see ISPM 12 for guidance) to use more generic wording rather than listing only individual species.</u>	P	<p><i>Category : SUBSTANTIVE</i>  <b>(791) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b></p>
96	<del>A systems approach is a combination of measures and, depending on the phytosanitary import requirements, it may be indicated on a phytosanitary certificate as an additional declaration in accordance with ISPM 12.</del>	P	<p><i>Category : SUBSTANTIVE</i>  <b>(742) Mexico (29 Sep 2024 9:12 PM)</b>  The text is not correct and the place in the annex is confusing, on the other hand it is not necessary, it will be determined in the draft SA proposal.</p>
96	<del>A systems approach is a combination of measures and, depending on the phytosanitary import requirements, it may be indicated on a phytosanitary certificate as an additional declaration in accordance with ISPM 12.</del> <u>The use of a systems approach does not negate the need for phytosanitary certificates. NPPOs involved</u>	P	<p><i>Category : TECHNICAL</i>  <b>(667) European Union (29 Sep 2024 8:20 AM)</b>  Somehow the SA should be reflected on the PC; this would facilitate safe trade.</p>

	<a href="#">in a systems approach may agree on the additional declaration to be included, including the pests covered by the systems approach.</a>		
96	A systems approach is a combination of measures and, depending on the phytosanitary import requirements, it may be indicated on a phytosanitary certificate as an additional declaration in accordance with ISPM 12.	C	Category : TECHNICAL <b>(491) United States of America (18 Sep 2024 5:16 PM)</b> Feasibility of a single SA for one commodity to be certified under SA is questionable and unlikely implementable by the industry.
96	<del>A systems approach is a combination of measures and, depending on the phytosanitary import requirements, it may be indicated on a phytosanitary certificate as an additional declaration in accordance with ISPM 12. The use of a systems approach does not negate the need for phytosanitary certificates. NPPOs involved in a systems approach may agree on the additional declaration to be included, including the pests covered by the systems approach.</del>	P	Category : TECHNICAL <b>(432) EPPO (15 Sep 2024 5:49 PM)</b> Somehow the SA should be reflected on the PC; this would facilitate safe trade.
96	A systems approach <del>is a combination of measures and, depending on the phytosanitary import requirements, it</del> may be indicated on a phytosanitary certificate as an additional declaration in accordance with ISPM 12. <u>If systems approaches are developed for pest groups, NPPOs should allow additional declarations to use more generic wording rather than listing only individual pests.</u>	P	Category : TECHNICAL <b>(295) COSAVE (26 Aug 2024 2:41 AM)</b> Last sentence moved from paragraph 58.
97	<b>3. <del>Responsibilities</del> Shared responsibilities of NPPOs and participating entities in addressing pest risk the agreed system approach along the seed supply chain</b>	P	Category : SUBSTANTIVE <b>(743) Mexico (29 Sep 2024 9:15 PM)</b> Changing the title, because the text refers to the need to share responsibility between the NPPOs and the participating entities and this is very important.
97	<del>3. Responsibilities of NPPOs and participating entities in addressing pest risk along the seed supply chain</del>	P	Category : SUBSTANTIVE <b>(668) European Union (29 Sep 2024 8:21 AM)</b> ISPMs are for NPPOs. The NPPO elements of this section 3 should more logically be placed in the NPPOs roles and responsibilities section 8. The responsibilities for the participating entities should be systematically removed because ISPMs are not addressed to these entities.
97	<b>3. Responsibilities of NPPOs and participating entities in addressing pest risk along the seed supply chain</b>	C	Category : SUBSTANTIVE <b>(633) China (29 Sep 2024 5:15 AM)</b> Chapter 3 and Chapter 8 should be merged into one chapter.
97	<del>3. Responsibilities of NPPOs and participating entities in addressing pest risk along the seed supply chain</del>	P	Category : SUBSTANTIVE <b>(433) EPPO (15 Sep 2024 5:49 PM)</b> ISPMs are for NPPOs. The NPPO elements of this section 3 should more logically be placed in the NPPOs roles and responsibilities section 8. The responsibilities for the participating entities should be systematically removed because ISPMs are not addressed to these entities.
97	<del>3. Responsibilities of NPPOs and participating entities in addressing pest risk along the seed supply chain</del>	P	Category : TECHNICAL <b>(296) COSAVE (26 Aug 2024 2:45 AM)</b> Move to section 8 to have NPPOs responsibilities all together
98	<u>National plant protection organizations are responsible for systematically determining the measures that comprise a systems approach and verifying their</u>	C	Category : SUBSTANTIVE <b>(769) Korea, Republic of (30 Sep 2024 8:16 AM)</b>

	effectiveness at reducing the pest risk posed by potential pests associated with each of the production stages. These measures should be in accordance with international or regional standards for pest risk management and systems approaches and may include existing production practices and quality-system components. To maintain flexibility and innovation in the system, participating entities may propose novel equivalent measures for a particular CCP, which NPPOs should evaluate for their effectiveness and feasibility. Appendix 1 of this annex depicts regulatory and non-regulatory actions performed by NPPOs and entities respectively at each CCP along the seed supply chain.		APQA think it's necessary to merge the content of section 3 into section 8. Roles and responsibilities.
98	<p>National plant protection organizations are responsible for systematically determining the measures that comprise a systems approach and verifying their effectiveness at reducing the pest risk posed by potential pests associated with each of the production stages. These measures should be in accordance with international or regional standards for pest risk management and systems approaches and may include existing production practices and quality-system components. To maintain flexibility and innovation in the system, participating entities may propose novel equivalent measures for a particular CCP, which NPPOs should evaluate for their effectiveness and feasibility. Appendix 1 of this annex depicts regulatory and non-regulatory actions performed by NPPOs and entities respectively at each CCP along the seed supply chain.</p> <p><u>4.- SA proposal for a seed species.</u></p> <p><u>When designing a systems approach, defining the seed species and target importing country(ies) must be done as joint work with the participating entities, in order to know the practices used for pest management in seed production. The NPPO of the exporting country should select appropriate practices, procedures and regulatory actions, and propose these in a draft paper to the NPPOs of the importing countries, with an explanation of how these practices, procedures and regulatory actions would reduce the pest risk associated to the selected seed species, to meet the phytosanitary import requirements of the importing country. It is suggested to consider the following information:</u></p> <p><u>- information on pests regulated in the importing countries, for which the systems approach addresses the pest risk;</u></p>	P	<p><i>Category : SUBSTANTIVE</i></p> <p><b>(745) Mexico (29 Sep 2024 9:24 PM)</b></p> <p>Including this section, since throughout the text on the SA design, it is not indicated how the draft SA will be proposed to the importing country. It is surprising that in point 7, SA evaluation, it is proposed to carry out pilot studies during the design stage.</p>

	<p><u>- a description of the mandatory measures in the systems approach and their effectiveness;</u></p> <p><u>- documentation indicating the components of the systems approach under the control of each NPPO; and</u></p> <p><u>- verification procedures in place.</u></p>		
98	<p>National plant protection organizations are responsible for systematically determining the measures that comprise a systems approach and verifying their effectiveness at reducing the pest risk posed by <del>potential-regulated</del> pests associated with each of the production stages. These measures should be in accordance with international or regional standards for <del>pest risk management and</del> systems approaches and may include existing production practices and quality-system components. To maintain flexibility and innovation in the system, participating entities may propose novel equivalent measures for a particular CCP, which NPPOs should evaluate for their effectiveness and feasibility. <del>Appendix 1 of this annex depicts regulatory and non-regulatory actions performed by NPPOs and entities respectively at each CCP along the seed supply chain.</del></p>	P	<p><i>Category : SUBSTANTIVE</i>  <b>(744) Mexico (29 Sep 2024 9:18 PM)</b>  Improving text.  Addressed in the general comments because the appendix is not convenient. It is confusing, it refers to an example of an NPPO and its reference is in ISPM 38.</p>
98	<p><del>National plant protection organizations are responsible for systematically determining the measures that comprise a systems approach and verifying their effectiveness at reducing the pest risk posed by potential pests associated with each of the production stages. These measures should be in accordance with international or regional standards for pest risk management and systems approaches and may include existing production practices and quality system components. To maintain flexibility and innovation in the system, participating entities may propose novel equivalent measures for a particular CCP, which NPPOs should evaluate for their effectiveness and feasibility. Appendix 1 of this annex depicts regulatory and non-regulatory actions performed by NPPOs and entities respectively at each CCP along the seed supply chain.</del></p>	P	<p><i>Category : SUBSTANTIVE</i>  <b>(669) European Union (29 Sep 2024 8:22 AM)</b>  See European Union comment on para 97 (deletion).</p>
98	<p>National plant protection organizations are responsible for systematically determining the measures that comprise a systems approach and verifying their effectiveness at reducing the pest risk posed by potential pests associated with each of the production stages. These measures should be in accordance with international or regional standards for pest risk management and systems</p>	C	<p><i>Category : TECHNICAL</i>  <b>(577) Canada (26 Sep 2024 11:12 PM)</b>  The second last sentence is confusing. Which NPPOs should evaluate novel equivalent measures- the NPPO of the importing or exporting country, or both? Who does the entity propose the measure to- the NPPO of the exporting country or the NPPO of the importing country?</p>

	approaches and may include existing production practices and quality-system components. To maintain flexibility and innovation in the system, participating entities may propose novel equivalent measures for a particular CCP, which NPPOs should evaluate for their effectiveness and feasibility. Appendix 1 of this annex depicts regulatory and non-regulatory actions performed by NPPOs and entities respectively at each CCP along the seed supply chain.		
98	National plant protection organizations are responsible for systematically determining the measures that comprise a systems approach and verifying their effectiveness at reducing the pest risk posed by potential pests associated with each of the production stages. These measures should be in accordance with international or regional standards <u>if relevant</u> , for pest risk management and systems approaches and may include existing production practices and quality-system components. To maintain flexibility and innovation in the system, participating entities may propose novel equivalent measures for a particular CCP, which NPPOs should evaluate for their effectiveness and feasibility. Appendix 1 of this annex depicts regulatory and non-regulatory actions performed by NPPOs and entities respectively at each CCP along the seed supply chain.	P	<p><i>Category : SUBSTANTIVE</i></p> <p><b>(526) Japan (20 Sep 2024 12:27 PM)</b></p> <p>Regional standards may not be relevant for countries from other regions.</p>
98	National plant protection organizations are responsible for systematically determining the measures that comprise a systems approach and verifying their effectiveness at reducing the pest risk posed by potential pests associated with each of the production stages. These measures should be in accordance with international or regional standards for pest risk management and systems approaches and may include existing production practices and quality-system components. To maintain flexibility and innovation in the system, participating entities may propose novel equivalent measures for a particular CCP, which NPPOs should evaluate for their effectiveness and feasibility. Appendix 1 of this annex depicts regulatory and non-regulatory actions performed by NPPOs and entities respectively at each CCP along the seed supply chain.	C	<p><i>Category : TECHNICAL</i></p> <p><b>(492) United States of America (18 Sep 2024 5:17 PM)</b></p> <p>Again, we have two potential scenarios that we may need to clarify here. See our comment above.</p>
98	<del>National plant protection organizations are responsible for systematically determining the measures that comprise a systems approach and verifying their effectiveness at reducing the pest risk posed by potential pests associated with each of the production stages. These measures should be in accordance with international or regional standards for pest risk management and systems approaches and may include existing production practices and quality-system</del>	P	<p><i>Category : SUBSTANTIVE</i></p> <p><b>(434) EPPO (15 Sep 2024 5:49 PM)</b></p> <p>See EPPO comment on para 97 (deletion).</p>

	<del>components. To maintain flexibility and innovation in the system, participating entities may propose novel equivalent measures for a particular CCP, which NPPOs should evaluate for their effectiveness and feasibility. Appendix 1 of this annex depicts regulatory and non-regulatory actions performed by NPPOs and entities respectively at each CCP along the seed supply chain.</del>		
98	National plant protection organizations are responsible for systematically determining the measures that comprise a systems approach and verifying their effectiveness at reducing the pest risk posed by potential pests associated with each of the production stages. These measures should be in accordance with international or regional standards for pest risk management and systems approaches and may include existing production practices and quality-system components. To maintain flexibility and innovation in the system, participating entities may propose novel equivalent measures for a particular CCP, which NPPOs should evaluate for their effectiveness and feasibility. Appendix 1 of this annex depicts <u>an example of</u> regulatory and non-regulatory actions performed by NPPOs and entities respectively at each CCP along the seed supply chain.	P	Category : <i>TECHNICAL</i> <b>(374) New Zealand (11 Sep 2024 2:00 AM)</b> Systems approaches will vary depending on the seed supply chain - not all CCPs and regulatory and non-regulatory actions in appendix 1 will be relevant.
98	<del>National plant protection organizations are responsible for systematically determining the measures that comprise a systems approach and verifying their effectiveness at reducing the pest risk posed by potential pests associated with each of the production stages. These measures should be in accordance with international or regional standards for pest risk management and systems approaches and may include existing production practices and quality-system components. To maintain flexibility and innovation in the system, participating entities may propose novel equivalent measures for a particular CCP, which NPPOs should evaluate for their effectiveness and feasibility. Appendix 1 of this annex depicts regulatory and non-regulatory actions performed by NPPOs and entities respectively at each CCP along the seed supply chain.</del>	P	Category : <i>TECHNICAL</i> <b>(297) COSAVE (26 Aug 2024 2:46 AM)</b> Moved to section 8
98	<del>National plant protection organizations</del> <u>The NPPOs</u> are responsible for systematically determining the measures that comprise a systems approach and verifying their effectiveness at reducing the pest risk posed by potential pests associated with each of the production stages. These measures should be in accordance with international or regional standards for pest risk management and systems approaches and may include existing production practices and quality-system components. To maintain flexibility and innovation in the system,	P	Category : <i>EDITORIAL</i> <b>(255) South Africa (20 Aug 2024 12:52 PM)</b> Suggest deletion since this is already written fully in the text.

	participating entities may propose novel equivalent measures for a particular CCP, which NPPOs should evaluate for their effectiveness and feasibility. Appendix 1 of this annex depicts regulatory and non-regulatory actions performed by NPPOs and entities respectively at each CCP along the seed supply chain.		
99	<b>4. <u>MonitoringSupervision</u></b>	P	<i>Category : SUBSTANTIVE</i> <b>(634) China (29 Sep 2024 5:16 AM)</b> Based on what is described in this section, The use of supervision is more accurate.
100	Verification should be conducted at several levels of the seed supply chain. The NPPOs <del>of involved in the exporting countries systems approach</del> should monitor the systems approach to ensure that the system is functioning satisfactorily. They should also conduct periodic audits and monitor the effect of any resulting modification to the participating entities' pest risk management plan.	P	<i>Category : SUBSTANTIVE</i> <b>(821) Australia (30 Sep 2024 8:17 PM)</b> Addition to take into account monitoring performed by the importing countries.
100	Verification should be conducted at several levels of the seed supply chain. The NPPOs of the exporting countries should monitor the systems approach to ensure that the system is functioning satisfactorily. They should also conduct periodic <del>audits and monitor the effect of audits. any resulting modification to the participating entities' pest risk management plan.</del>	P	<i>Category : SUBSTANTIVE</i> <b>(670) European Union (29 Sep 2024 8:23 AM)</b> Removal of "and monitor the effect of any resulting modification to the participating entities' pest risk management plan", as it suggests that the entity has responsibility for changing their plans, when it should be the NPPO responsible for approving any change.
100	Verification should be conducted at several levels of the seed supply chain. The NPPOs of the exporting countries should monitor the systems approach to ensure that the system is functioning satisfactorily. They should also conduct periodic audits and monitor the effect of any resulting modification to the participating entities' pest risk management plan.	C	<i>Category : SUBSTANTIVE</i> <b>(580) Canada (27 Sep 2024 4:48 PM)</b> It is unclear what this means. What are the levels of the seed supply chain? What is the supply chain - within the country authorizing the entity or in different countries? Difficult to understand how this would be implemented. Consider re-wording the first sentence to clarify the intent
100	Verification should be conducted at several levels of the seed <del>supply chain</del> <u>production process</u> . The NPPOs of the exporting countries should monitor the systems approach to ensure that the system is functioning satisfactorily. They should also conduct periodic audits and monitor the effect of any resulting modification to the participating entities' pest risk management plan.	P	<i>Category : TECHNICAL</i> <b>(493) United States of America (18 Sep 2024 5:19 PM)</b> See comment above re: production process.
100	Verification should be conducted at several levels of the seed supply chain. The NPPOs of the exporting countries should monitor the systems approach to ensure that the system is functioning satisfactorily. They should also conduct periodic <del>audits and monitor the effect of audits. any resulting modification to the participating entities' pest risk management plan.</del>	P	<i>Category : SUBSTANTIVE</i> <b>(435) EPPO (15 Sep 2024 5:49 PM)</b> Removal of "and monitor the effect of any resulting modification to the participating entities' pest risk management plan", as it suggests that the entity has responsibility for changing their plans, when it should be the NPPO responsible for approving any change.
100	Verification <del>of compliance with the systems approach</del> should be conducted at several levels of the seed supply chain. The NPPOs of the exporting countries	P	<i>Category : TECHNICAL</i> <b>(375) New Zealand (11 Sep 2024 2:02 AM)</b> Added text to specify the scope of the verification in this context


	should monitor the systems approach to ensure that the system is functioning satisfactorily. They should also conduct periodic audits and monitor the effect of any resulting modification to the participating entities' pest risk management plan.		
100	Verification should be conducted at several <del>levels</del> <u>points</u> of the seed supply chain. The NPPOs of the exporting countries should monitor the systems approach to ensure that the system is functioning satisfactorily. They should also conduct periodic audits and monitor the effect of any resulting modification to the participating entities' pest risk management plan.	P	Category : TECHNICAL <b>(298) COSAVE (26 Aug 2024 2:47 AM)</b> For consistency
100	Verification should be conducted at several levels of the seed supply chain. The NPPOs of the exporting countries should monitor the systems approach to ensure that the system is functioning <del>satisfactorily</del> <u>according to the standards</u> . They should also conduct periodic audits and monitor the effect of any resulting modification to the participating entities' pest risk management plan.	P	Category : TECHNICAL <b>(275) Sri Lanka (22 Aug 2024 9:46 AM)</b> suggest to remove satisfactory word and add according to the standard considering the satisfactory wording is not adequate
101	Procedures for monitoring and audit, as well as criteria for determining when a systems approach is re-evaluated, should be put in place by <del>NPPOs before entering a systems approach arrangement with entities (see ISPM 47 (NPPOs, if required according to ISPM 47 Audit in the phytosanitary context))</del> .	P	Category : SUBSTANTIVE <b>(749) Mexico (29 Sep 2024 9:27 PM)</b> The criteria for internal (exporting NPPOs) and external (importing NPPOs) audits will be established in the design of the SA. The wording is changed for better understanding.
101	Procedures for monitoring and audit, as well as criteria for determining when a systems approach <u>is should be</u> re-evaluated, should be put in place by NPPOs <del>before entering a systems approach arrangement with entities (see ISPM 47 (Audit in the phytosanitary context))</del> .	P	Category : SUBSTANTIVE <b>(672) European Union (29 Sep 2024 12:14 PM)</b> Clearer.  Removal of "before entering a systems approach arrangement with entities" to recognise that the agreement should be between NPPOs.
101	Procedures for monitoring and audit, as well as criteria for determining when a systems approach <u>is should be</u> re-evaluated, should be put in place by NPPOs <del>before entering a systems approach arrangement with entities (see ISPM- ISPM 47 (.Audit in the phytosanitary context)). Audit in the phytosanitary context))</del> .	P	Category : SUBSTANTIVE <b>(436) EPPO (15 Sep 2024 5:49 PM)</b> Clearer.  Removal of "before entering a systems approach arrangement with entities" to recognise that the agreement should be between NPPOs.
101	Procedures for monitoring and audit, as well as criteria for determining when a systems approach is re-evaluated, should be put in place by <del>NPPOs before entering a systems approach arrangement with entities (see NPPOs, if required according to ISPM 47 (Audit in the phytosanitary context))</del> .	P	Category : TECHNICAL <b>(299) COSAVE (26 Aug 2024 2:49 AM)</b> For better understanding
102	<del>5. Establishing performance criteria for authorization of participating entities</del>	P	Category : SUBSTANTIVE <b>(746) Mexico (29 Sep 2024 9:25 PM)</b> Delete all this section
102	<del>5. Establishing performance criteria for authorization of</del>	P	Category : SUBSTANTIVE <b>(673) European Union (29 Sep 2024 12:16 PM)</b>

	<b>participating entities</b>		Deletion as can be covered under roles and responsibilities.
102	<b>5. Establishing performance criteria for authorization of participating entities</b>	C	Category : TECHNICAL <b>(494) United States of America (18 Sep 2024 5:21 PM)</b> For an entity to be considered as conforming with the systems approach, it should meet the performance criteria for each measure it applies. Measures may include the entity's production practices and quality systems, if approved by the NPPO as components of the systems approach (see section 2.3 of this annex).
102	<del>5. Establishing performance criteria for authorization of participating entities</del>	P	Category : SUBSTANTIVE <b>(437) EPPO (15 Sep 2024 5:49 PM)</b> Deletion as can be covered under roles and responsibilities.
102	<del>5. Establishing performance criteria for authorization of participating entities</del>	C	Category : TECHNICAL <b>(376) New Zealand (11 Sep 2024 2:09 AM)</b> This is a potential implementation issue. Guidance information will be needed on performance criteria and how this may differ between countries.
102	<del>5. Establishing performance criteria for authorization of participating entities</del>	P	Category : SUBSTANTIVE <b>(300) COSAVE (26 Aug 2024 2:51 AM)</b> We suggest to delete the entire section. It is not appropriate to include performance criteria to authorize entities in a ISPM. If not accepted it should be re-drafted in order to describe what are the performance criteria, how would they be applied and how would they be evaluated to determine if they are met.
103	<del>When developing a systems approach, NPPOs should incorporate a mechanism, based on performance criteria, for authorizing entities along the entire seed supply chain.</del>	P	Category : SUBSTANTIVE <b>(747) Mexico (29 Sep 2024 9:25 PM)</b> This generates confusion, so suggesting elimination. We do not agree with establishing criteria for the participation of companies, related to the pest management practices they use. Seed producing companies that want to participate may do so and if they do not comply with what is established by the NPPO, they will be removed from the system or whatever is established by the NPPO of the exporting country.
103	<del>When developing a systems approach, NPPOs should incorporate a mechanism, based on performance criteria, for authorizing entities along the entire seed supply chain.</del>	P	Category : SUBSTANTIVE <b>(674) European Union (29 Sep 2024 12:16 PM)</b> Deletion as can be covered under roles and responsibilities.
103	When developing a systems approach, NPPOs should incorporate a mechanism, based on performance criteria, for <b>authorizing entities along the entire seed supply chain.</b>	C	Category : SUBSTANTIVE <b>(581) Canada (27 Sep 2024 4:52 PM)</b> This is confusing if the supply chain is in several countries or the exporting countries are not known. Also, is it necessary to authorize all entities along the entire seed supply chain?
103	When developing a systems approach, NPPOs should incorporate a <del>mechanism,</del> <u>based on performance criteria, mechanism</u> for authorizing entities along the entire seed supply chain.	P	Category : EDITORIAL <b>(539) Canada (20 Sep 2024 10:03 PM)</b> Simplify text
103	<u>Performance criteria should be established before the entities enter the agreement to</u>	P	Category : SUBSTANTIVE

	<u>participate in a systems approach.</u> When developing a systems approach, NPPOs should incorporate a mechanism, based on performance criteria, for authorizing entities along the entire seed supply chain.		<b>(521) Japan (20 Sep 2024 12:18 PM)</b> To authorize entities based on performance criteria, performance criteria should be established before agreement of the systems approach. In addition, there is a description regarding the establishment of performance criteria as one of the responsibilities of NPPOs in ISPM 45.
103	<del>When developing a systems approach, NPPOs should incorporate a mechanism, based on performance criteria, for authorizing entities along the entire seed supply chain.</del>	P	<i>Category : SUBSTANTIVE</i> <b>(438) EPPO (15 Sep 2024 5:49 PM)</b> Deletion as can be covered under roles and responsibilities.
103	<del>When developing a systems approach, NPPOs should incorporate a mechanism, based on performance criteria, for authorizing entities along the entire seed supply chain.</del>	P	<i>Category : SUBSTANTIVE</i> <b>(301) COSAVE (26 Aug 2024 2:51 AM)</b> We suggest to delete the entire section. It is not appropriate to include performance criteria to authorize entities in a ISPM. If not accepted it should be re-drafted in order to describe what are the performance criteria, how would they be applied and how would they be evaluated to determine if they are met.
104	For an entity to be considered as conforming with the systems approach, it should meet the performance criteria for each measure associated with the systems approach that it applies. The <del>entity should implement an approved quality system.</del> The entity's most effective production practices may be evaluated and approved by the NPPO developing the systems approach for integration into the systems approach (see section 2.3 of this annex).	P	<i>Category : SUBSTANTIVE</i> <b>(792) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b> Quality is not an NPPO function
104	<del>For an entity to be considered as conforming with the systems approach, it should meet the performance criteria for each measure associated with the systems approach that it applies. The entity should implement an approved quality system. The entity's most effective production practices may be evaluated and approved by the NPPO developing the systems approach for integration into the systems approach (see section 2.3 of this annex).</del>	P	<i>Category : SUBSTANTIVE</i> <b>(748) Mexico (29 Sep 2024 9:25 PM)</b> This generates confusion, so suggesting elimination. We do not agree with establishing criteria for the participation of companies, related to the pest management practices they use. Seed producing companies that want to participate may do so and if they do not comply with what is established by the NPPO, they will be removed from the system or whatever is established by the NPPO of the exporting country.
104	<del>For an entity to be considered as conforming with the systems approach, it should meet the performance criteria for each measure associated with the systems approach that it applies. The entity should implement an approved quality system. The entity's most effective production practices may be evaluated and approved by the NPPO developing the systems approach for integration into the systems approach (see section 2.3 of this annex).</del>	P	<i>Category : SUBSTANTIVE</i> <b>(675) European Union (29 Sep 2024 12:17 PM)</b> Deletion as can be covered under roles and responsibilities.
104	For an entity to be considered as conforming with the systems approach, it should meet the performance criteria for each measure <del>associated with the systems approach that it applies. The entity should implement an approved quality system.</del> <u>The Measures may include the</u> entity's most effective production practices <del>may be</del>	P	<i>Category : TECHNICAL</i> <b>(495) United States of America (19 Sep 2024 3:32 PM)</b> Clarity of NPPO's role.

	<del>evaluated and quality systems, if approved by the NPPO developing as components of the systems approach for integration into the systems approach (see section 2.3 of this annex).</del>		
104	<del>For an entity to be considered as conforming with the systems approach, it should meet the performance criteria for each measure associated with the systems approach that it applies. The entity should implement an approved quality system. The entity's most effective production practices may be evaluated and approved by the NPPO developing the systems approach for integration into the systems approach (see section 2.3 of this annex).</del>	P	Category : SUBSTANTIVE <b>(439) EPPO (15 Sep 2024 5:49 PM)</b> Deletion as can be covered under roles and responsibilities.
104	<del>For an entity to be considered as conforming with the systems approach, it should meet the performance criteria for each measure associated with the systems approach that it applies. The entity should implement an approved quality system. The entity's most effective production practices may be evaluated and approved by the NPPO developing the systems approach for integration into the systems approach (see section 2.3 of this annex).</del>	P	Category : SUBSTANTIVE <b>(302) COSAVE (26 Aug 2024 2:52 AM)</b> We suggest to delete the entire section. It is not appropriate to include performance criteria to authorize entities in a ISPM. If not accepted it should be re-drafted in order to describe what are the performance criteria, how would they be applied and how would they be evaluated to determine if they are met.
105	<b>6. Multilateral systems approaches</b>	C	Category : SUBSTANTIVE <b>(496) United States of America (19 Sep 2024 3:45 PM)</b> 1. It seems that throughout the annex, the assumption is that this would/could entail different parts of the SA, different CCPs, being handled across multiple countries. One SA implemented jointly in multiple countries "along the seed supply chain". We do not see it this way. 2. We see the SA happening in the country of production (only). That country's NPPO oversees/accredits/certifies the entity that implements the SA (including industry practices, quality system, HACCP mitigations). 3. An importing NPPO(s) works in collaboration. They have their PRA pest list and they determine whether the proposed SA satisfactorily mitigates their pests of concern. If not, the importing NPPO can work with the entity and with exporting NPPO to add mitigations in order to meet their import requirements. 4. If more than one NPPO agrees to accept a given SA, then we have multilateral acceptance of the SA that is implemented at the country of origin. 5. Re-export: Let's say country A agrees to accept seeds produced under a SA in country B (certified/accredited producer overseen by country B's NPPO), but country C wants a fungicide treatment in addition to what the country A requires. Then either they could add the fungicide treatment to the SA in country B (easy), OR maybe they say they want to do the fungicide treatment in country A, then re-export to country C. In the latter case, the additional requirement is outside the SA. With this in mind, one of our comments was about PCs (see above). The

			statement in an AD (or elsewhere on the PC) would not just attest to being "produced under systems approach", it would need to cite a specific accredited/certified facility that produced the seeds.
105	<b>6. Multilateral systems approaches</b>	P	<p><i>Category : SUBSTANTIVE</i>  <b>(458) EPPO (15 Sep 2024 6:50 PM)</b>  The chapter is not really appropriate for an ISPM and it would fit better in guidance material. We propose deleting.</p> <p>Furthermore, one important aspect that is not covered appropriately is how to deal with situations where part of the measures are taking place in one country (e.g. up to harvest) and part are taking place in another country (e.g. treatment and testing).</p>
106	When the same systems approach is recognized by several importing countries, this becomes a multilateral approach, which may suit the multinational character of the seed trade. In multilateral systems approaches, <del>particular attention should be paid to those elements occurring communication along the entire supply chain issues including changes in pest status and non-compliances becomes critical for the exporting countries after detection integrity of a non-compliance the systems approach.</del>	P	<p><i>Category : SUBSTANTIVE</i>  <b>(822) Australia (30 Sep 2024 8:22 PM)</b>  Australia is aware that this removes the 'should' and so the requirement from this paragraph, but considers that the requirement was ambiguous and added little value.</p>
106	When the same systems approach is recognized by several importing countries, this <del>becomes-can be</del> a multilateral approach, which may suit the multinational character of the seed trade. In multilateral systems approaches, particular attention should be paid to those elements occurring in the exporting countries after detection of a non-compliance.	P	<p><i>Category : TECHNICAL</i>  <b>(542) Japan (24 Sep 2024 10:54 AM)</b>  When the systems approach is recognized by several importing countries, it does not always become a multilateral approach.</p>
106	When the same systems approach is recognized by several importing countries, this becomes a multilateral approach, which may suit the multinational character of the seed trade. In multilateral systems approaches, <b>particular attention</b> should be paid to those elements occurring in the exporting countries after detection of a non-compliance.	C	<p><i>Category : SUBSTANTIVE</i>  <b>(770) Korea, Republic of (30 Sep 2024 8:18 AM)</b>  There needs to be a clear explanation of what "particular attention" are taken to the exporting country after detection of a non-compliance (e.g. re-evaluation of the exporting country's systems or cancellation of multilateral systems approaches for the exporting country).</p>
106	When the same systems approach is recognized by several importing countries, this becomes a multilateral approach, which may suit the multinational character of the seed <del>trademovement. In multilateral systems approaches, particular attention should be paid to those elements occurring in the exporting countries after detection of a non-compliance.</del>	P	<p><i>Category : SUBSTANTIVE</i>  <b>(750) Mexico (29 Sep 2024 9:29 PM)</b>  Proposing elimination, because whatever the non-compliance is, it must be communicated in the same way as in bilateral cases and will be established in the SA approved by the participating countries.</p>
106	When the same systems approach is recognized by several importing countries, this becomes a multilateral approach, which may suit the multinational character of the seed trade. <del>In multilateral systems approaches, particular attention should be paid</del>	P	<p><i>Category : SUBSTANTIVE</i>  <b>(582) Canada (27 Sep 2024 4:58 PM)</b>  The second sentence does not add any clarity; suggest to remove or revise.</p>

	<del>to those elements occurring in the exporting countries after detection of a non-compliance.</del>		
106	When the same systems approach is recognized by several importing countries, this becomes a multilateral approach, which may suit the multinational character of the seed trade. In multilateral systems approaches, particular attention should be paid to those elements occurring in the exporting countries after detection of a non-compliance.	C	<p>Category : <i>SUBSTANTIVE</i></p> <p><b>(522) Japan (20 Sep 2024 12:19 PM)</b></p> <p>The intent of the second sentence of this paragraph ("In multilateral systems approaches, ...") should be clarified.</p> <p>The action after non-compliance is detected may be covered by section 8.2.2 "Reporting and addressing nonconformities". However, if there are any specific requirements regarding non-compliance of consignments under the multilateral system approach, the intent of this should be clarified.</p>
106	When the same systems approach is recognized by several importing countries, this becomes a multilateral approach, which may suit the multinational character of the seed trade. In multilateral systems approaches, <del>particular attention exporting countries should be paid</del> <u>investigate occurrences of non-compliance and communicate outcomes to those elements occurring all NPPOs involved in the exporting countries after detection of a non-compliance</u> <u>systems approach.</u>	P	<p>Category : <i>SUBSTANTIVE</i></p> <p><b>(377) New Zealand (11 Sep 2024 2:12 AM)</b></p> <p>Reworded to make it clear what should be done with respect to non-compliances as 'particular attention' is vague</p>
106	When the same systems approach is recognized by several importing countries, this becomes a multilateral <u>systems</u> approach, which may suit the multinational character of the seed <u>trademovement</u> . <del>In multilateral systems approaches, particular attention should be paid to those elements occurring in the exporting countries after detection of a non-compliance.</del>	P	<p>Category : <i>TECHNICAL</i></p> <p><b>(303) COSAVE (26 Aug 2024 2:55 AM)</b></p> <p>1) For consistency. 2) Last sentence deleted because is not clear to what elements it refers to</p>
106	<u>When the same systems approach is recognized by several importing countries, this becomes a multilateral approach, which may suit the multinational character of the seed trade. In multilateral systems approaches, particular attention should be paid to those elements occurring in the exporting countries after detection of a non-compliance.</u>	C	<p>Category : <i>SUBSTANTIVE</i></p> <p> Congo, DR</p> <p><b>(259) IPPC Regional Workshop Africa (21 Aug 2024 1:39 PM)</b></p> <p>The language of global economics makes a distinction between a plurilateral arrangement and a multilateral arrangement as follows: A plurilateral agreement is a multi-national legal or trade agreement between countries (it is an agreement between more than two countries, but not a great many, which would be multilateral agreement).</p>
108	National plant protection organizations participating in a systems approach should evaluate its effectiveness. This may be done by conducting pilot studies during the design phase before seeking full recognition of the systems <u>approach for phytosanitary certification</u> <u>approach.</u>	P	<p>Category : <i>SUBSTANTIVE</i></p> <p><b>(793) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b></p>
108	National plant protection organizations participating in a systems approach should evaluate its effectiveness. <del>This may be done by conducting pilot studies during at the design phase before seeking full recognition beginning of the systems approach for phytosanitary certification implementation of the agreed SA or by means of a pilot plan among the NPPOs involved.</del>	P	<p>Category : <i>SUBSTANTIVE</i></p> <p><b>(751) Mexico (29 Sep 2024 9:34 PM)</b></p> <p>The second sentence is very confusing, it refers to pilot studies during the design phase. We understand that the SA can only be evaluated during the implementation phase.</p>

108	National plant protection organizations <u>participating-wishing to participate</u> in a systems approach should evaluate its effectiveness. This may be done by conducting pilot studies during the design phase before seeking full recognition of the systems approach for phytosanitary certification.	P	Category : TECHNICAL <b>(677) European Union (29 Sep 2024 12:21 PM)</b> As these measures are taken before the final acceptance of the systems approach "wishing to participate" seems to be more appropriate.
108	National plant protection organizations participating in a systems approach should evaluate its <u>feasibility and</u> effectiveness. <u>This Pilot operations may be done by conducting pilot studies during the design phase before seeking full recognition of the useful as a way for NPPOs to evaluate a proposed systems approach before any necessary regulatory changes are made to accept shipments produced under this mechanism for phytosanitary certification and to formally recognize the participating entity(-ies).</u>	P	Category : TECHNICAL <b>(497) United States of America (19 Sep 2024 3:48 PM)</b> More specific.
108	National plant protection organizations <u>participating-wishing to participate</u> in a systems approach should evaluate its effectiveness. This may be done by conducting pilot studies during the design phase before seeking full recognition of the systems approach for phytosanitary certification.	P	Category : TECHNICAL <b>(442) EPPO (15 Sep 2024 5:49 PM)</b> As these measures are taken before the final acceptance of the systems approach "wishing to participate" seems to be more appropriate.
108	National plant protection organizations participating in a systems approach should evaluate its effectiveness. This may be done by conducting pilot studies during the <u>design-implementation</u> phase before seeking full recognition of the systems <u>approach for phytosanitary certification approach.</u>	P	Category : TECHNICAL <b>(304) COSAVE (26 Aug 2024 2:57 AM)</b> Pilot studies should be conducted during the implementation phase
109	These evaluations may be carried out on a representative number of consignments for the seed <u>commodity at different species stages of its production</u> and over a designated period of time.	P	Category : SUBSTANTIVE <b>(752) Mexico (29 Sep 2024 9:35 PM)</b> The seed will always be exported in the same stage, after harvesting., so it is not clear when they refer to different stages of its production.
109	These evaluations may be carried out on a representative number of consignments for the seed <u>commodity at different species stages of its production and</u> over a designated period of time.	P	Category : TECHNICAL <b>(305) COSAVE (26 Aug 2024 2:58 AM)</b> Text related to evaluation of consignments, therefore not applicable to stages of production
110	<u>With a multilateral systems approach, it may be particularly important to incorporate part of the evaluation into the design phase, when the decisions are made about which measures to include in the systems approach.</u>	P	Category : SUBSTANTIVE <b>(753) Mexico (29 Sep 2024 9:36 PM)</b> Proposing to eliminate this paragraph, because there is no conceptual difference for the evaluation of a multilateral SA.
110	With a multilateral systems approach, it may be particularly important to incorporate part of the evaluation into the design phase, when the decisions are made about which measures to include in the systems approach.	C	Category : EDITORIAL <b>(678) European Union (29 Sep 2024 12:22 PM)</b> Suggestion to move this paragraph 110 before paragraph 109 (more logical order).
110	With a multilateral systems approach, it may be particularly important to incorporate part of the evaluation into the design phase, when the decisions are	C	Category : SUBSTANTIVE <b>(583) Canada (27 Sep 2024 5:01 PM)</b> It would be helpful to clarify why this is particularly important and how it

	made about which measures to include in the systems approach.		relates to the measures to be included.
110	With a multilateral systems approach, it may be particularly important to incorporate part of the evaluation into the design phase, when the decisions are made about which measures to include in the systems approach.	C	Category : EDITORIAL <b>(443) EPPO (15 Sep 2024 5:49 PM)</b> Suggestion to move this paragraph 110 before paragraph 109 (more logical order).
110	With a multilateral systems approach, it may be particularly important to incorporate part of the evaluation into the design phase, when the decisions are made about which measures to include in the systems approach.	C	Category : TECHNICAL <b>(378) New Zealand (11 Sep 2024 2:14 AM)</b> Guidance material is needed for implementation on how to evaluate measures to decide what to incorporate into the SA. This may be something to include in a revision of ISPM 14 rather than this annex.
111	<del>When deciding whether a systems approach for a given seed commodity is acceptable, the NPPOs participating in the systems approach should evaluate whether it reduces pest risk to a level that allows the phytosanitary import requirements of all participating countries along the seed supply chain to be met. For importing countries, such evaluation should include consideration of the following information:</del>	P	Category : SUBSTANTIVE <b>(754) Mexico (29 Sep 2024 9:37 PM)</b> This part was moved up, to a new point 4: SA proposal for a seed species
111	When deciding whether a systems approach for a given seed commodity is acceptable, the NPPOs participating <a href="#">or wishing to participate</a> in the systems approach should evaluate whether it reduces pest risk to a level that allows the phytosanitary import requirements of all participating countries along the seed supply chain to be met. For importing countries, such evaluation should include consideration of the following information:	P	Category : TECHNICAL <b>(679) European Union (29 Sep 2024 12:23 PM)</b> Precision given (see also comment on para 108)
111	When deciding whether a systems approach for a given seed commodity is acceptable, the NPPOs participating in the systems approach should evaluate whether it reduces pest risk to a level that allows the phytosanitary import requirements of all participating countries along the seed supply chain to be met. For importing countries, such evaluation should <del>include consideration of consider</del> the <del>following information</del> <a href="#">following</a> :	P	Category : EDITORIAL <b>(585) Canada (27 Sep 2024 5:25 PM)</b> Improve clarity
111	When deciding whether a systems approach for a given seed commodity is acceptable, the NPPOs participating in the systems approach should evaluate whether it reduces pest risk to a level that allows the phytosanitary import requirements of all participating countries along the seed supply chain to be met. For importing countries, such evaluation should include consideration of the following information:	C	Category : SUBSTANTIVE <b>(584) Canada (27 Sep 2024 5:16 PM)</b> There could be many countries and commodity combinations involved in a multilateral system and this would require a large amount of coordination between countries which may be challenging to achieve. Each country has the sovereign right to determine their own level of risk and does their own assessment of the measures.
111	When deciding whether a systems approach for a given seed commodity is acceptable, the NPPOs participating <a href="#">or wishing to participate</a> in the systems	P	Category : TECHNICAL <b>(444) EPPO (15 Sep 2024 5:49 PM)</b> Precision given (see also comment on para 108)

	approach should evaluate whether it reduces pest risk to a level that allows the phytosanitary import requirements of all participating countries along the seed supply chain to be met. For importing countries, such evaluation should include consideration of the following information:		
111	When deciding whether a systems approach for a given seed <del>commodity-species</del> is acceptable, the NPPOs participating in the systems approach should evaluate whether it reduces pest risk <del>to a level that allows the phytosanitary import requirements of all participating countries</del> along the seed supply <del>chain to be met</del> chain. For importing countries, such evaluation should include consideration of the following information:	P	Category : TECHNICAL <b>(306) COSAVE (26 Aug 2024 3:01 AM)</b> For simplification
112	information on pests regulated <del>in by</del> the importing <del>countries, for which countries</del> <u>and how</u> the systems approach <del>addresses-intends to address</del> the pest risk;	P	Category : SUBSTANTIVE <b>(586) Canada (27 Sep 2024 5:31 PM)</b> To clarify the role of importing countries that are evaluating the SA
115	verification procedures in place; <u>- communication procedures are in place among participating NPPOs regarding noncompliance and corrective actions.</u>	P	Category : TECHNICAL <b>(498) United States of America (19 Sep 2024 3:50 PM)</b> adding a necessary component
116	<b>8. <del>Roles and responsibilities</del>Responsibilities</b>	P	Category : SUBSTANTIVE <b>(755) Mexico (29 Sep 2024 9:39 PM)</b> Eliminating the word "roles", because it is not necessary to define them for the NPPOs because they are those established by the IPPC or the legal instruments of each country.
116	<b>8. <del>Roles and responsibilities</del>Responsibilities</b>	P	Category : TECHNICAL <b>(307) COSAVE (26 Aug 2024 3:02 AM)</b> For consistency
118	A systems approach may be developed by the NPPO (or multiple NPPOs) of any importing country along the seed supply chain, in collaboration with the NPPOs of the exporting countries <del>and, if applicable, and</del> entities that wish to participate in the systems approach.	P	Category : SUBSTANTIVE <b>(756) Mexico (29 Sep 2024 9:41 PM)</b> The NPPOs will always need the collaboration of the entities to develop a SA.
118	<u>The responsibilities of the NPPOs of the importing and exporting countries in relation to systems approaches are described in ISPM 14. In the case of a multilateral systems approach, the responsibilities of each NPPO participating in the systems approach along the seed supply chain should be identified. These responsibilities should, for each of the participating countries, include the harmonization of the list of pests covered by the systems approach, the analysis of the associated pest risk, the evaluation and description of the measures that comprise the systems approach, and the identification of the CCPs in the systems approach where those measures can be monitored.</u>	P	Category : TECHNICAL <b>(680) European Union (29 Sep 2024 12:31 PM)</b> The role of the exporting country is not sufficiently highlighted in this paragraph. See the first sentence of section 8 (Developing systems approaches) of ISPM 14: "The development of a systems approach may be undertaken by the importing country, or by the exporting country", or ideally through the cooperation of both countries.". The role of the exporting country is important because the measures are applied in the exporting country. Therefore this paragraph has been modified.

	<p><u>These measures should be in accordance with ISPMs for pest risk management and systems approaches and may include existing production practices and quality-system components. To maintain flexibility and innovation in the system, authorised entities may propose novel equivalent measures for a particular CCP, which NPPOs should evaluate for their effectiveness, feasibility and equivalence. It is upon the NPPOs to decide whether a novel measure will be included in the systems approach.</u></p> <p>A systems approach may be developed by the NPPO (or multiple NPPOs) of any importing country along the seed supply chain, in collaboration with the NPPOs of the exporting countries and, if applicable, <u>in consultation with</u> entities that wish to <u>be authorised and</u> participate in the systems approach.</p> <p><u>The importing NPPO decides on the suitability of the measures within the systems approach to meet its phytosanitary import requirements. The exporting or re-exporting NPPOs provide information on the regulatory actions and production practices applied by the authorised entities within their respective territories as part of the systems approach. Ideally this is done in collaboration so that possibilities and requirements are aligned</u></p>		
118	A systems approach may be developed by the NPPO (or multiple NPPOs) of any importing country along the seed supply chain, in collaboration with the NPPOs of the exporting countries and, if applicable, entities that wish to participate in the systems approach.	C	<p><i>Category : SUBSTANTIVE</i>  <b>(551) Japan (26 Sep 2024 9:49 AM)</b>  The procedures and scheme for development of a systems approach by multiple NPPOs are not clear. Examples of scheme for agreeing on a multilateral systems approach may be needed.</p>
118	<p><u>The responsibilities of the NPPOs of the importing and exporting countries in relation to systems approaches are described in ISPM 14. In the case of a multilateral systems approach, the responsibilities of each NPPO participating in the systems approach along the seed supply chain should be identified. These responsibilities should, for each of the participating countries, include the harmonization of the list of pests covered by the systems approach, the analysis of the associated pest risk, the evaluation and description of the measures that comprise the systems approach, and the identification of the CCPs in the systems approach where those measures can be monitored.</u></p> <p><u>These measures should be in accordance with ISPMs for pest risk management and systems approaches and may include existing production practices and quality-system components. To maintain flexibility and innovation in the system, authorised entities may propose novel equivalent measures for a particular CCP,</u></p>	P	<p><i>Category : TECHNICAL</i>  <b>(445) EPPO (15 Sep 2024 5:49 PM)</b>  The role of the exporting country is not sufficiently highlighted in this paragraph. See the first sentence of section 8 (Developing systems approaches) of ISPM 14: "The development of a systems approach may be undertaken by the importing country, or by the exporting country", or ideally through the cooperation of both countries.". The role of the exporting country is important because the measures are applied in the exporting country. Therefore this paragraph has been modified.</p>

	<p><u>which NPPOs should evaluate for their effectiveness, feasibility and equivalence. It is upon the NPPOs to decide whether a novel measure will be included in the systems approach.</u></p> <p>A systems approach may be developed by the NPPO (or multiple NPPOs) of any importing country along the seed supply chain, in collaboration with the NPPOs of the exporting countries and, if applicable, <u>in consultation with</u> entities that wish to <u>be authorised and</u> participate in the systems approach.</p> <p><u>The importing NPPO decides on the suitability of the measures within the systems approach to meet its phytosanitary import requirements. The exporting or re-exporting NPPOs provide information on the regulatory actions and production practices applied by the authorised entities within their respective territories as part of the systems approach. Ideally this is done in collaboration so that possibilities and requirements are aligned</u></p>		
118	<p><u>The responsibilities of NPPOs are described in ISPM 14. National plant protection organizations are responsible for assessing the pest risk, setting the phytosanitary import requirements, designing the system, evaluating the effectiveness of production practices and quality system components in reducing pest risk, determining the measures that comprise a systems approach and verifying their effectiveness at reducing the pest risk posed by regulated pests associated with each of the production stages. Appendix 1 of this annex depicts regulatory and non-regulatory actions performed by NPPOs and entities respectively at each CCP along the seed supply chain.</u> A systems approach may be developed by the NPPO (or multiple NPPOs) of any importing country along the seed supply chain, in collaboration with the NPPOs of the exporting countries and, if applicable, entities that wish to participate in the systems approach.</p>	P	<p>Category : <i>TECHNICAL</i>  <b>(308) COSAVE (26 Aug 2024 3:04 AM)</b>  Text moved and modified from para 98</p>
119	<p>The NPPOs of exporting countries participating in a systems approach should communicate the integrated measures of the systems approach to the entities participating in the systems approach in their respective territories for implementation. Each NPPO with participating entities located in its territory should have a method for registering which of these entities are participating in the systems approach for a specific seed <del>commodity</del> <u>species</u> and should communicate that information to other NPPOs as needed.</p>	P	<p>Category : <i>SUBSTANTIVE</i>  <b>(757) Mexico (29 Sep 2024 9:42 PM)</b>  For consistency</p>

119	<del>The NPPOs of exporting countries participating in a systems approach should communicate the integrated measures of the systems approach to the entities participating in the systems approach in their respective territories for implementation. Each NPPO with participating entities located in its territory should have a method for registering which of these entities are participating in the systems approach for a specific seed commodity and should communicate that information to other NPPOs as needed. All NPPOs that participate in, or recognize the systems approach, should establish a channel of communication between themselves on the conformity status of all authorised entities, especially when different measures are applied in different countries.</del>	P	Category : <i>SUBSTANTIVE</i> <b>(681) European Union (29 Sep 2024 12:32 PM)</b> See comment on para 118.
119	The NPPOs of exporting countries participating in a systems approach should <del>communicate</del> authorize and oversee participating entities that implement the integrated measures of the systems approach <del>to the entities participating in the systems approach in their respective territories for implementation</del> territories. Each NPPO with participating entities located in its territory should have a method for registering which of these entities are participating in the systems approach for a specific seed commodity and should communicate that information to other NPPOs as needed.	P	Category : <i>TECHNICAL</i> <b>(499) United States of America (19 Sep 2024 4:17 PM)</b> "Communicating" the measures seems to apply to the one scenario where NPPO's independently define the SA as a requirement, but it doesn't make sense in the other scenario - see our comments above.
119	<del>The NPPOs of exporting countries participating in a systems approach should communicate the integrated measures of the systems approach to the entities participating in the systems approach in their respective territories for implementation. Each NPPO with participating entities located in its territory should have a method for registering which of these entities are participating in the systems approach for a specific seed commodity and should communicate that information to other NPPOs as needed. All NPPOs that participate in, or recognize the systems approach, should establish a channel of communication between themselves on the conformity status of all authorised entities, especially when different measures are applied in different countries.</del>	P	Category : <i>SUBSTANTIVE</i> <b>(446) EPPO (15 Sep 2024 5:49 PM)</b> See comment on para 118.
119	The NPPOs of exporting countries <del>participating in a systems approach</del> should communicate the integrated measures of the systems approach to the entities participating in the systems approach in their respective territories for implementation. Each NPPO with participating entities located in its territory should have a method for registering which of these entities are participating in the systems approach for a specific seed <del>commodity</del> and should communicate that	P	Category : <i>TECHNICAL</i> <b>(309) COSAVE (26 Aug 2024 3:07 AM)</b> To avoid redundancy

	information to other NPPOs as needed.		
120	All NPPOs that participate in, or recognize, the systems approach should establish a channel of <u>effective and in real time</u> communication between themselves on the conformity status of all participating entities, especially when different measures are applied in different countries.	P	Category : SUBSTANTIVE <b>(758) Mexico (29 Sep 2024 9:45 PM)</b> To improve the text.
120	<del>All NPPOs that participate in, or recognize, the systems approach should establish a channel of communication between themselves on the conformity status of all participating entities, especially when different measures are applied in different countries.</del> All NPPOs that participate in the systems approach, should establish a channel of communication between themselves on the conformity status of all authorised entities, especially when different measures are applied in different countries.	P	Category : SUBSTANTIVE <b>(682) European Union (29 Sep 2024 12:33 PM)</b> See comment on para 118.
120	All NPPOs that participate in, or recognize, the systems approach should establish a channel of communication between themselves on the <u>conformity-eligibility</u> status of all participating entities, <del>especially when different measures are applied, in different countries.</del>	P	Category : SUBSTANTIVE <b>(588) Canada (27 Sep 2024 5:47 PM)</b> Conformity status is a vague concept
120	<del>All NPPOs that participate in, or recognize, the systems approach should establish a channel of communication between themselves on the conformity status of all participating entities, especially when different measures are applied in different countries.</del> All NPPOs that participate in the systems approach, should establish a channel of communication between themselves on the conformity status of all authorised entities, especially when different measures are applied in different countries.	P	Category : SUBSTANTIVE <b>(459) EPPO (15 Sep 2024 6:56 PM)</b> See comment on para 118.
120	All NPPOs that participate in, or recognize, the systems approach should <del>establish a channel of communication between themselves</del> <u>notify each other</u> on the conformity status of all participating entities, especially when different measures are applied in different countries.	P	Category : EDITORIAL <b>(379) New Zealand (11 Sep 2024 2:16 AM)</b> Simpler language. Also, 'notification' is the terminology used in ISPM 13.
121	<del>If a nonconformity is identified, it should be reported to the NPPO of the exporting country (country of origin or country of re-export). Identification of nonconformities should trigger the corrective actions for the participating entities specified in the systems approach agreement. It may also trigger a review of any specific measure in the systems approach, any part of the systems approach, or the entire systems approach. The NPPOs of importing and exporting countries should increase monitoring following the identification of critical nonconformities, or if they repeatedly identify other (i.e. non-critical) nonconformities, and immediately suspend recognition of the systems approach until corrective actions are taken (see also ISPM 45 (Requirements for national plant protection organizations if</del>	P	Category : SUBSTANTIVE <b>(683) European Union (29 Sep 2024 12:35 PM)</b> This is the first time that a systems approach agreement is mentioned. It should be added in a earlier stage and also defined.  It should be clear how the entity can maintain its activities if a non-conformity is found. Perhaps non-conformities could be categorized, allowing the entity to continue exporting seeds with the normal phytosanitary certification

	<p><u><del>authorizing entities to perform phytosanitary actions</del></u>)). The NPPOs of the exporting countries should monitor the systems approach to ensure conformity with the <u>phytosanitary procedures within the systems approach</u>. Monitoring should be conducted at <u>several levels of the seed supply chain</u>.</p> <p><u>Procedures for monitoring and auditing, as well as criteria for determining when a systems approach should be re-evaluated, should be put in place by NPPOs before entering a systems approach arrangement with entities (see ISPM 47 (Audit in the phytosanitary context)).</u></p> <p><u>If a nonconformity is identified by the NPPO of the importing country, the NPPO of the exporting country should be notified according to ISPM 13 (Guidelines of the notification of nonconformity and emergency action). The exporting country should investigate significant instances of nonconformity to determine the possible cause.</u></p> <p><u>If a nonconformity with the systems approach is identified by a participating NPPOs, or by an authorized entity, it should be reported to the NPPOs participating in the systems approach. Identification of nonconformities should trigger the corrective actions for the authorized entities specified in the systems approach agreement. It may also trigger a review of specific measures in the systems approach, parts of the systems approach, or the entire systems approach. The NPPOs of importing, re-exporting and exporting countries may decide to increase monitoring following the identification of critical nonconformities, or if they repeatedly identify other (i.e. non-critical) non-conformities, and immediately suspend recognition of the systems approach until corrective actions are taken (see also ISPM 45 (Requirements for national plant protection organizations if authorizing entities to perform phytosanitary actions)). NPPOs should at all times communicate their results of their corrective action, increased monitoring, etc.</u></p>	
121	<p><b>If a nonconformity is identified</b>, it should be reported to the NPPO of the exporting country (country of origin or country of re-export). Identification of nonconformities should trigger the corrective actions for the participating entities</p>	<p>C <i>Category : TECHNICAL</i>  <b>(590) Canada (27 Sep 2024 5:55 PM)</b>  Is the importing country going to be able to identify non-conformities? This should probably state that the importing country should send a notice of non-</p>

	specified in the systems approach agreement. It may also trigger a review of any specific measure in the systems approach, any part of the systems approach, or the entire systems approach. The NPPOs of importing and exporting countries should increase monitoring following the identification of critical nonconformities, or if they repeatedly identify other (i.e. non-critical) nonconformities, and immediately suspend recognition of the systems approach until corrective actions are taken (see also ISPM 45 ( <i>Requirements for national plant protection organizations if authorizing entities to perform phytosanitary actions</i> )).		compliance to the exporting country. The exporting country should then review the systems approach and if necessary take action with the entities involved. The text should be modified to clarify the intent.
121	If a nonconformity is identified, it should be reported to the NPPO of the exporting country (country of origin or country of re-export). Identification of nonconformities should trigger the corrective actions for the participating entities specified in the systems approach agreement. It may also trigger a review of any specific measure in the systems approach, any part of the systems approach, or the entire systems approach. The NPPOs of importing and exporting countries should increase monitoring following the identification of critical <del>nonconformities,</del> <u>nonconformities</u> or if they repeatedly identify other <u>repeated</u> (i.e., non-critical) nonconformities, <del>and immediately</del> <u>. NPPOs may</u> suspend recognition of the systems <del>approach approach, as necessary,</del> until corrective actions are taken (see also ISPM 45 ( <i>Requirements for national plant protection organizations if authorizing entities to perform phytosanitary actions</i> )).	P	<i>Category : TECHNICAL</i> <b>(500) United States of America (19 Sep 2024 6:01 PM)</b> More clarity in requirements
121	<del>If a nonconformity is identified, it should be reported to the NPPO of the exporting country (country of origin or country of re-export). Identification of nonconformities should trigger the corrective actions for the participating entities specified in the systems approach agreement. It may also trigger a review of any specific measure in the systems approach, any part of the systems approach, or the entire systems approach. The NPPOs of importing and exporting countries should increase monitoring following the identification of critical nonconformities, or if they repeatedly identify other (i.e. non-critical) nonconformities, and immediately suspend recognition of the systems approach until corrective actions are taken (see also ISPM 45 (<i>Requirements for national plant protection organizations if authorizing entities to perform phytosanitary actions</i>)).</del> <u>The NPPOs of the exporting countries should monitor the systems approach to ensure conformity with the phytosanitary procedures within the systems approach. Monitoring should be conducted at several levels of the seed supply chain.</u>  <u>Procedures for monitoring and auditing, as well as criteria for determining when a</u>	P	<i>Category : SUBSTANTIVE</i> <b>(447) EPPO (15 Sep 2024 5:49 PM)</b> This is the first time that a systems approach agreement is mentioned. It should be added in a earlier stage and also defined.  It should be clear how the entity can maintain its activities if a non-conformity is found. Perhaps non-conformities could be categorized, allowing the entity to continue exporting seeds with the normal phytosanitary certification

	<p><u>systems approach should be re-evaluated, should be put in place by NPPOs before entering a systems approach arrangement with entities (see ISPM 47 (<i>Audit in the phytosanitary context</i>)).</u></p> <p><u>If a nonconformity is identified by the NPPO of the importing country, the NPPO of the exporting country should be notified according to ISPM 13 (<i>Guidelines of the notification of nonconformity and emergency action</i>). The exporting country should investigate significant instances of nonconformity to determine the possible cause.</u></p> <p><u>If a nonconformity with the systems approach is identified by a participating NPPOs, or by an authorized entity, it should be reported to the NPPOs participating in the systems approach. Identification of nonconformities should trigger the corrective actions for the authorized entities specified in the systems approach agreement. It may also trigger a review of specific measures in the systems approach, parts of the systems approach, or the entire systems approach. The NPPOs of importing, re-exporting and exporting countries may decide to increase monitoring following the identification of critical nonconformities, or if they repeatedly identify other (i.e. non-critical) non-conformities, and immediately suspend recognition of the systems approach until corrective actions are taken (see also ISPM 45 (<i>Requirements for national plant protection organizations if authorizing entities to perform phytosanitary actions</i>)). NPPOs should at all times communicate their results of their corrective action, increased monitoring, etc.</u></p>		
121	<p>If a nonconformity is identified, it should be reported to <u>all the <del>NPPO of NPPOs participating in the exporting country (country of origin or country of re-export)</del>systems approach</u>. Identification of nonconformities should trigger the corrective actions for the participating entities specified in the systems approach agreement. It may also trigger a review of any specific measure in the systems approach, any part of the systems approach, or the entire systems approach. The NPPOs <del>of importing and exporting countries</del> should increase monitoring following the identification of critical nonconformities, or if they repeatedly identify other (i.e. non-critical) nonconformities, and <u><del>immediately suspend</del>consider whether recognition of the systems approach <del>should be suspended</del></u> until corrective actions</p>	P	<p>Category : <i>TECHNICAL</i></p> <p><b>(310) COSAVE (26 Aug 2024 3:13 AM)</b></p> <p>1) To alert other NPPOs that something got wrong with the systems approach and corrective actions are needed. 2) Not always non-compliances should trigger a suspension of a phytosanitary measure (e.g. a system approach) but the assessment whether it should be suspended</p>

	are taken (see also ISPM 45 ( <i>Requirements for national plant protection organizations if authorizing entities to perform phytosanitary actions</i> )).		
122	The responsibilities of importing and exporting countries in relation to systems approaches are described in ISPM 14. In the case of a multilateral systems approach, the responsibilities of each NPPO participating in the systems approach along the seed supply chain should be identified. These responsibilities should, for each of the participating countries, include the <a href="#">harmonization-identification</a> of their lists of regulated pests, the analysis of the associated pest risk, the evaluation and description of the measures that comprise the systems approach, and the identification of the CCPs in the systems approach where those measures are to be applied.	P	Category : <i>TECHNICAL</i> <b>(794) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b>
122	<del>The responsibilities of importing and exporting countries in relation to systems approaches are described in ISPM 14. In the case of a multilateral systems approach, the responsibilities of each NPPO participating in the systems approach along the seed supply chain should be identified. These responsibilities should, for each of the participating countries, include the harmonization of their lists of regulated pests, the analysis of the associated pest risk, the evaluation and description of the measures that comprise the systems approach, and the identification of the CCPs in the systems approach where those measures are to be applied.</del> <a href="#">Evaluation of systems approaches for seeds</a>  <a href="#">The evaluation is outlined in ISPM 14 (Use of integrated measures in a systems approach for pest risk management)</a>	P	Category : <i>SUBSTANTIVE</i> <b>(684) European Union (29 Sep 2024 12:36 PM)</b> Moved to para 118. See European Union comment on para 118.
122	The responsibilities of importing and exporting countries in relation to systems approaches are described in ISPM 14. In the case of a multilateral systems approach, the responsibilities of each NPPO participating in the systems approach along the seed supply chain should be identified. These responsibilities should, for each of the participating countries, include the <a href="#">harmonization</a> of their lists of regulated pests, the analysis of the associated pest risk, the evaluation and description of the measures that comprise the systems approach, and the identification of the CCPs in the systems approach where those measures are to be	C	Category : <i>SUBSTANTIVE</i> <b>(593) Canada (27 Sep 2024 7:15 PM)</b> The harmonization of regulated pests may prove to be challenging

	applied.		
122	The responsibilities of importing and exporting countries in relation to systems approaches are described in ISPM 14. In the case of a multilateral systems approach, the responsibilities of each NPPO participating in the systems approach along the seed supply chain should be identified. These responsibilities <del>should</del> <u>should include</u> , for each of the participating countries, <del>include</del> the <u>harmonization-provision</u> of their lists of regulated pests, the analysis of the associated pest risk, the evaluation and description of the measures that comprise the systems approach, and the identification of the CCPs in the systems approach where those measures are to be applied.	P	<p>Category : <i>SUBSTANTIVE</i></p> <p><b>(554) Canada (26 Sep 2024 7:23 PM)</b></p> <p>The PRA would be a key component of a systems approach for seed commodities, and likely if there are multiple countries/NPPOs involved in such an approach, each would want to do its own risk assessment, as they'd have different concerns, different lists of regulated pests, etc. Each country has the sovereign right to establish its level of protection.</p>
122	The responsibilities of importing and exporting countries in relation to systems approaches are described in ISPM 14. <u>The NPPOs of importing and exporting countries should maintain the confidentiality of any data or information on production practices and quality systems provided by entities.</u> In the case of a multilateral systems approach, the responsibilities of each NPPO participating in the systems approach along the seed supply chain should be identified. These responsibilities should, for each of the participating countries, include the harmonization of their lists of regulated pests, the analysis of the associated pest risk, the evaluation and description of the measures that comprise the systems approach, and the identification of the CCPs in the systems approach where those measures are to be applied.	P	<p>Category : <i>SUBSTANTIVE</i></p> <p><b>(523) Japan (20 Sep 2024 12:24 PM)</b></p> <p>As paragraph 127 explains that entities should provide all relevant information on production practices and quality systems, it could include confidential information for the entities.</p>
122	The responsibilities of importing and exporting countries in relation to systems approaches are described in ISPM 14. In the case of a multilateral systems approach, the responsibilities of each NPPO participating in the systems approach along the seed supply chain should be identified. These responsibilities should, for each of the participating countries, include <del>the harmonization of</del> their lists of regulated pests, the analysis of the associated pest risk, the evaluation and description of the measures that comprise the systems approach, and the identification of the CCPs in the systems approach where those measures are to be applied.	P	<p>Category : <i>TECHNICAL</i></p> <p><b>(501) United States of America (19 Sep 2024 6:03 PM)</b></p> <p>Disagree - the pest lists would unlikely be harmonized.</p>
122	<del>The responsibilities of importing and exporting countries in relation to systems approaches are described in ISPM 14. In the case of a multilateral systems approach, the responsibilities of each NPPO participating in the systems approach along the seed supply chain should be identified. These responsibilities should, for</del>	P	<p>Category : <i>SUBSTANTIVE</i></p> <p><b>(448) EPPO (15 Sep 2024 5:49 PM)</b></p> <p>Moved to para 118. See EPPO comment on para 118.</p>

	<p><del>each of the participating countries, include the harmonization of their lists of regulated pests, the analysis of the associated pest risk, the evaluation and description of the measures that comprise the systems approach, and the identification of the CCPs in the systems approach where those measures are to be applied. Evaluation of systems approaches for seeds</del></p> <p><u>The evaluation is outlined in ISPM 14 (Use of integrated measures in a systems approach for pest risk management)</u></p>		
122	<p><del>The responsibilities of importing and exporting countries in relation to systems approaches are described in ISPM 14.</del> In the case of a multilateral systems approach, the responsibilities of each NPPO participating in the systems approach along the seed supply chain should be identified. These responsibilities should, for each of the participating <del>countries</del>NPPOs, include the <u>harmonization-identification</u> of their lists of regulated pests, the analysis of the associated pest risk, the evaluation and description of the measures that comprise the systems approach, and the identification of the CCPs in the systems approach where those measures are to be applied.</p>	P	<p>Category : TECHNICAL  <b>(311) COSAVE (26 Aug 2024 3:16 AM)</b>            1) First sentence moved to the beginning of the section because is a general requirement, 2) The list of regulated pests will not be harmonized. NPPOs should provide the list of regulated pests</p>
123	As countries participating in the systems approach develop harmonized requirements, any new NPPO joining the systems approach should evaluate if they are able to meet the phytosanitary requirements for those elements of the systems approach that are applicable to them.	C	<p>Category : SUBSTANTIVE  <b>(592) Canada (27 Sep 2024 7:12 PM)</b>            Contracting parties have sovereign authority, to prescribe and adopt phytosanitary measures to protect plant health within their territories and to determine their appropriate level of protection for plant health. The development of harmonized requirements among participating NPPOs may prove to be challenging for countries.</p>
123	As <del>countries</del> -NPPOs participating in the systems approach develop harmonized requirements, any new NPPO joining the systems approach should evaluate if they are able to meet the phytosanitary requirements for those elements of the systems approach that are applicable to them.	P	<p>Category : TECHNICAL  <b>(312) COSAVE (26 Aug 2024 3:17 AM)</b>            For consistency</p>
124	<b>8.2 Responsibilities of entities participating in systems approaches</b>	P	<p>Category : SUBSTANTIVE  <b>(687) European Union (29 Sep 2024 12:42 PM)</b>            ISPMs are for NPPOs (see general comment).</p>
124	<b>8.2 Responsibilities of entities participating in systems approaches</b>	C	<p>Category : SUBSTANTIVE  <b>(685) European Union (29 Sep 2024 12:37 PM)</b>            ISPMs are for NPPOs (see general comment).</p>
124	<b>8.2 Responsibilities of entities participating in systems approaches</b>	C	<p>Category : SUBSTANTIVE  <b>(502) United States of America (19 Sep 2024 7:04 PM)</b>            This section also needs to acknowledge the two scenarios under which a SA</p>

			could be developed/implemented. The second paragraph (127) comes from the perspective that the NPPO will develop the systems approach. In the other scenario, we suggest an additional paragraph to specify that entities interested in proposing a SA (to help facilitate multinational movement) should contact NPPOs to determine feasibility and jointly outline a SA that can be approved by NPPOs.
124	<b>8.2 Responsibilities of entities participating in systems approaches</b>	P	Category : SUBSTANTIVE <b>(450) EPPO (15 Sep 2024 5:49 PM)</b> ISPMs are for NPPOs (see general comment).
125	<del>Entities participating in a systems approach should collaborate with NPPOs on the following:</del>	P	Category : SUBSTANTIVE <b>(688) European Union (29 Sep 2024 12:43 PM)</b> See our comment on para 124. ISPMs are for NPPOs (see general comment).
125	<del>Entities participating in a systems approach should collaborate with NPPOs on the following:</del>	P	Category : SUBSTANTIVE <b>(451) EPPO (15 Sep 2024 5:49 PM)</b> See our comment on para 124. ISPMs are for NPPOs (see general comment).
126	<del>Participating entities should identify the countries involved in the seed supply chain for the seed commodity.</del>	P	Category : SUBSTANTIVE <b>(689) European Union (29 Sep 2024 12:43 PM)</b> See our comment on para 124. ISPMs are for NPPOs (see general comment).
126	<del>Participating entities should identify the countries involved in the seed supply chain for the seed commodity.</del>	P	Category : SUBSTANTIVE <b>(452) EPPO (15 Sep 2024 5:49 PM)</b> See our comment on para 124. ISPMs are for NPPOs (see general comment).
126	<del>Participating entities should identify</del> <u>Identify</u> the countries involved in the seed supply chain for the seed <del>commodity</del> <u>species</u> .	P	Category : TECHNICAL <b>(313) COSAVE (26 Aug 2024 3:19 AM)</b> To avoid redundancy
127	<del>If an NPPO wishes to develop a systems approach, it should identify the list of regulated pests potentially associated with the seed commodity in the seed supply chain. The entities involved should provide all relevant information on production practices and quality systems, including any data related to the effectiveness of the practices in reducing pest risk, to allow the NPPO to evaluate these practices for inclusion in the systems approach. This information may relate to practices during any stage of seed production and distribution and to measures applied in other countries along the seed supply chain.</del>	P	Category : SUBSTANTIVE <b>(691) European Union (29 Sep 2024 12:45 PM)</b> See our comment on para 124. ISPMs are for NPPOs (see general comment).
127	If an NPPO wishes to develop a systems approach, it should identify the list of regulated pests potentially associated with the seed commodity in the seed supply chain. The entities involved should provide all relevant information on production practices and quality systems, including any data related to the effectiveness of the practices in reducing pest risk, to allow the NPPO to evaluate these practices for inclusion in the systems approach. This information may relate to practices during any stage of seed production and distribution and to measures applied in other countries along the seed supply	C	Category : TECHNICAL <b>(596) Canada (27 Sep 2024 7:39 PM)</b> The last sentence should be modified to improve clarity

	chain.		
127	If an NPPO wishes to develop a systems approach, it should identify the list of regulated pests potentially associated with the seed commodity in the seed supply chain. The entities involved should provide all relevant information on production practices and quality systems, including any data related to the effectiveness of the practices in reducing pest risk, to allow the NPPO to evaluate these practices for inclusion in the systems approach. This information may relate to practices during any stage of seed production and distribution and to measures applied in other countries along the seed supply chain.	C	<p><i>Category : SUBSTANTIVE</i></p> <p><b>(595) Canada (27 Sep 2024 7:29 PM)</b></p> <p>It is unclear whether the seed supply chain is just in the country of the NPPO. If it is outside the country, the NPPO may not be able to predict what the seed supply chain will be as it may not remain constant or may not be known (particularly in the case of re-export). Also, the NPPO proposing the systems approach may/will not be able to identify all the pests in the other countries.</p>
127	If an NPPO wishes to develop a systems approach, it should identify the list of regulated pests potentially associated with the seed commodity in the seed supply chain. The <u>primary focus should be on regulated pests that occur in the production area(s) and what practices will be used at the CCPs to ensure that the risks of these pests are being properly mitigated and that new or emerging pests will be quickly detected and mitigated.</u> The entities involved should provide all relevant information on production practices and quality systems, including any data related to the effectiveness of the practices in reducing pest risk, to allow the NPPO to evaluate these practices for inclusion in the systems approach. This information may relate to practices during any stage of seed production and distribution and to measures applied in other countries along the seed supply chain.	P	<p><i>Category : SUBSTANTIVE</i></p> <p><b>(594) Canada (27 Sep 2024 7:24 PM)</b></p> <p>Stress the importance of mitigating the risks of regulated pests</p>
127	If an NPPO wishes to develop a systems approach, it should identify the list of regulated pests potentially associated with the seed commodity in the seed supply chain. The entities involved should provide all relevant information on production <u>places</u> , practices and quality systems, including any data related to the effectiveness of the practices in reducing pest risk, to allow the NPPO to evaluate these practices for inclusion in the systems approach. This information may relate to practices during any stage of seed production and distribution and to measures applied in other countries along the seed supply chain.	P	<p><i>Category : SUBSTANTIVE</i></p> <p><b>(527) Japan (20 Sep 2024 4:53 PM)</b></p> <p>The information on production places would be crucial for NPPOs to evaluate the practices.</p>
127	<del>If an NPPO wishes to develop a systems approach, it should identify the list of regulated pests potentially associated with the seed commodity in the seed supply chain.</del> The entities involved should provide all relevant information on production practices and quality systems, including any data related to the effectiveness of the practices in reducing pest <u>risk, to risk for the pests of regulatory concern that occur</u>	P	<p><i>Category : TECHNICAL</i></p> <p><b>(503) United States of America (19 Sep 2024 7:07 PM)</b></p> <p>This sentence - an action by the NPPO does not seem to belong in this section about responsibilities of participating entities. Alternatively, it could be rephrased: "Once the list of pests potentially associated with the seed in the production area are identified by the NPPO, the entities involved should.."</p>

	<u>in the production area. This information will</u> allow the NPPO to evaluate these practices for inclusion in the systems <del>approach</del> <u>approach at the CCPs ensuring that pests of concern are being properly mitigated and that new or emerging pests will be quickly detected and mitigated.</u> This information may relate to practices during any stage of seed production and distribution and to measures applied in other countries along the seed supply chain.		
127	<del>If an NPPO wishes to develop a systems approach, it should identify the list of regulated pests potentially associated with the seed commodity in the seed supply chain. The entities involved should provide all relevant information on production practices and quality systems, including any data related to the effectiveness of the practices in reducing pest risk, to allow the NPPO to evaluate these practices for inclusion in the systems approach. This information may relate to practices during any stage of seed production and distribution and to measures applied in other countries along the seed supply chain.</del>	P	Category : <i>SUBSTANTIVE</i> <b>(453) EPPO (15 Sep 2024 5:49 PM)</b> See our comment on para 124. ISPMs are for NPPOs (see general comment).
127	<del>If an NPPO wishes to develop a systems approach, it should identify the list of regulated pests potentially associated with the seed commodity in the seed supply chain.</del> The entities involved should provide all relevant information on production practices and quality systems, including any data related to the effectiveness of the practices in reducing pest risk, to allow the NPPO to evaluate these practices for inclusion in the systems approach. This information may relate to practices during any stage of seed production and distribution and to measures applied in other countries along the seed supply chain.	P	Category : <i>TECHNICAL</i> <b>(380) New Zealand (11 Sep 2024 2:21 AM)</b> This should be deleted as this section is about 'entity' responsibility not 'NPPO' responsibility.
127	<del>If an NPPO wishes to develop a systems approach, it should identify the list of regulated pests potentially associated with the seed commodity in the seed supply chain.</del> The entities involved should provide all relevant information on production practices and quality systems, including any data related to the effectiveness of the practices in reducing pest risk, to allow the NPPO to evaluate these practices for inclusion in the systems approach. This information may relate to practices during any stage of seed production and distribution and to measures applied in other countries along the seed supply chain.	P	Category : <i>TECHNICAL</i> <b>(314) COSAVE (26 Aug 2024 3:21 AM)</b> This is a responsibility of NPPOs and not of entities
128	<b>8.2.1 Quality systems for authorization of entities</b>	C	Category : <i>SUBSTANTIVE</i> <b>(795) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b> Suggest removing this section or recraft as supervision of authorized entities
128	<b>8.2.1 Quality systems for authorization of entities</b>	P	Category : <i>SUBSTANTIVE</i> <b>(692) European Union (29 Sep 2024 12:46 PM)</b>

			See our comment on para 124. ISPMs are for NPPOs (see general comment).
128	<b>8.2.1 Quality systems for authorization of entities</b>	P	Category : SUBSTANTIVE <b>(454) EPPO (15 Sep 2024 5:49 PM)</b> See our comment on para 124. ISPMs are for NPPOs (see general comment).
128	<b>8.2.1 Quality systems for authorization of entities</b>	P	Category : SUBSTANTIVE <b>(315) COSAVE (26 Aug 2024 3:22 AM)</b> The section describes components of quality systems without relation with the impact of these components to reduce pest risk. It is just a description of quality aspects by itself
129	<del>The use of a quality system</del> <b>8.2.1. Traceability</b>  <u>Participating entities in a systems approach should ensure that adequate records are kept allowing traceability in relation to all critical control points along the seed supply chain. These records should be kept in the exporting country for those measures that are applied pre-export or during transit, and in the importing country for the measures undertaken in the importing country. The Quality Systems that companies in the seed industry may have in place could provide the necessary elements that are required for tracing back and tracking the seeds from a SA formalizes the processes used to maintain quality and provides the basis for consistency, which can lead to the delivery of a commodity with predictable or reliable quality. A quality system provides the mechanism to align processes and product quality regardless of country of origin.</u>	P	Category : SUBSTANTIVE <b>(760) Mexico (29 Sep 2024 9:50 PM)</b> Everything that is written in this point, about Quality System is correct. These systems that companies in the seed industry have, will help NPPOs to verify the processes they perform, but they refer specifically to quality processes. What these systems do provide is the strong traceability system that companies need to have. In the text of this annex, traceability, which is the key element in the development of an SA, has not been mentioned, so we propose to incorporate it here.
129	<del>The use of a quality system formalizes the processes used to maintain quality and provides the basis for consistency, which can lead to the delivery of a commodity with predictable or reliable quality. A quality system provides the mechanism to align processes and product quality regardless of country of origin.</del>	P	Category : SUBSTANTIVE <b>(693) European Union (29 Sep 2024 12:47 PM)</b> See European Union comment on para 128 (deletion).
129	<del>The use of a quality system formalizes the processes used to maintain quality and provides the basis for consistency, which can lead to the delivery of a commodity with predictable or reliable quality. A quality system provides the mechanism to align processes and product quality regardless of country of origin.</del>	P	Category : SUBSTANTIVE <b>(460) EPPO (15 Sep 2024 7:04 PM)</b> See EPPO comment on para 128 (deletion).
129	<del>The use of a quality system formalizes the processes used to maintain quality and provides the basis for consistency, which can lead to the delivery of a commodity with predictable or reliable quality. A quality system provides the mechanism to align processes and product quality regardless of country of origin.</del>	P	Category : SUBSTANTIVE <b>(316) COSAVE (26 Aug 2024 3:22 AM)</b> The section describes components of quality systems without relation with the impact of these components to reduce pest risk. It is just a description of quality aspects by itself
130	<del>As a minimum, the components of a quality system for entities should include:</del>	P	Category : SUBSTANTIVE <b>(694) European Union (29 Sep 2024 12:48 PM)</b> See European Union comment on para 128 (deletion).
130	<b>As a minimum, the components of a quality system for entities should include:</b>	P	Category : SUBSTANTIVE

			<b>(461) EPPO (15 Sep 2024 7:04 PM)</b> See EPPO comment on para 128 (deletion).
130	<del>As a minimum, the components of a quality system for entities should include:</del>	P	Category : <i>SUBSTANTIVE</i> <b>(317) COSAVE (26 Aug 2024 3:23 AM)</b> The section describes components of quality systems without relation with the impact of these components to reduce pest risk. It is just a description of quality aspects by itself
131	<del>a quality policy that describes the commitment and goals towards which the entity is working;</del>	P	Category : <i>SUBSTANTIVE</i> <b>(695) European Union (29 Sep 2024 12:49 PM)</b> See European Union comment on para 128 (deletion).
131	<del>a quality policy that describes the commitment and goals towards which the entity is working;</del>	P	Category : <i>SUBSTANTIVE</i> <b>(466) EPPO (15 Sep 2024 7:06 PM)</b> See EPPO comment on para 128 (deletion).
131	<del>a quality policy that describes the commitment and goals towards which the entity is working;</del>	P	Category : <i>SUBSTANTIVE</i> <b>(318) COSAVE (26 Aug 2024 3:23 AM)</b> The section describes components of quality systems without relation with the impact of these components to reduce pest risk. It is just a description of quality aspects by itself
132	<del>standard operating procedures, which are the detailed methods that are executed to produce the quality commodity;</del>	P	Category : <i>SUBSTANTIVE</i> <b>(697) European Union (29 Sep 2024 12:50 PM)</b> See European Union comment on para 128 (deletion).
132	standard operating procedures, which are the detailed methods that are executed to produce the quality <u>commodity specifying the commodity, the pathway and the countries involved</u> ;	P	Category : <i>TECHNICAL</i> <b>(597) Canada (27 Sep 2024 7:44 PM)</b> To be more specific.
132	<del>standard operating procedures, which are the detailed methods that are executed to produce the quality commodity;</del>	P	Category : <i>SUBSTANTIVE</i> <b>(465) EPPO (15 Sep 2024 7:06 PM)</b> See EPPO comment on para 128 (deletion).
132	<del>standard operating procedures, which are the detailed methods that are executed to produce the quality commodity;</del>	P	Category : <i>SUBSTANTIVE</i> <b>(319) COSAVE (26 Aug 2024 3:24 AM)</b> The section describes components of quality systems without relation with the impact of these components to reduce pest risk. It is just a description of quality aspects by itself
133	<del>systems for training, auditing, and issuing corrective actions;</del>	P	Category : <i>SUBSTANTIVE</i> <b>(698) European Union (29 Sep 2024 12:51 PM)</b> See European Union comment on para 128 (deletion).
133	systems for training, auditing, and <u>issuing taking</u> corrective actions;	P	Category : <i>TECHNICAL</i> <b>(504) United States of America (19 Sep 2024 7:21 PM)</b> more appropriate
133	<del>systems for training, auditing, and issuing corrective actions;</del>	P	Category : <i>SUBSTANTIVE</i> <b>(464) EPPO (15 Sep 2024 7:05 PM)</b> See EPPO comment on para 128 (deletion).
133	<del>systems for training, auditing, and issuing corrective actions;</del>	P	Category : <i>SUBSTANTIVE</i> <b>(320) COSAVE (26 Aug 2024 3:24 AM)</b>

			The section describes components of quality systems without relation with the impact of these components to reduce pest risk. It is just a description of quality aspects by itself
134	<del>record-keeping; and</del>	P	Category : <i>SUBSTANTIVE</i> <b>(699) European Union (29 Sep 2024 12:52 PM)</b> See European Union comment on para 128 (deletion).
134	<del>record-keeping; and</del>	P	Category : <i>SUBSTANTIVE</i> <b>(463) EPPO (15 Sep 2024 7:05 PM)</b> See EPPO comment on para 128 (deletion).
134	<del>record-keeping; and</del>	P	Category : <i>SUBSTANTIVE</i> <b>(321) COSAVE (26 Aug 2024 3:24 AM)</b> The section describes components of quality systems without relation with the impact of these components to reduce pest risk. It is just a description of quality aspects by itself
134	<u>documentation and</u> record-keeping; and	P	Category : <i>SUBSTANTIVE</i> <b>(249) Thailand (19 Aug 2024 6:57 AM)</b> To cover documentation for the establishment of a complete quality system.
135	<del>continuous improvement.</del>	P	Category : <i>SUBSTANTIVE</i> <b>(700) European Union (29 Sep 2024 12:52 PM)</b> See European Union comment on para 128 (deletion).
135	<del>continuous improvement.</del>	P	Category : <i>SUBSTANTIVE</i> <b>(587) Canada (27 Sep 2024 5:40 PM)</b> We think a quality management system helps drive continuous improvement, but we don't think this should be stated as a core component for the purposes of this ISPM. The quality management system for the purposes of this ISPM needs to achieve its objectives (whether or not there is continuous improvement).
135	<del>continuous improvement.</del>	P	Category : <i>SUBSTANTIVE</i> <b>(462) EPPO (15 Sep 2024 7:05 PM)</b> See EPPO comment on para 128 (deletion).
135	continuous improvement.  <u>8.2.1 Traceability</u>  <u>Participating entities should ensure that adequate records are retained to allow traceability in relation to all critical control points along the seed supply chain. These records should be retained in the exporting country for those measures that are applied pre-export or during transit, and in the importing country for the measures undertaken in the importing country</u>	P	Category : <i>TECHNICAL</i> <b>(323) COSAVE (26 Aug 2024 3:27 AM)</b> Consider to add text regarding traceability which is important in a SA. Text added in line with Annex to ISPM 39 under consultation
135	<del>continuous improvement.</del>	P	Category : <i>TECHNICAL</i> <b>(322) COSAVE (26 Aug 2024 3:25 AM)</b>

			The section describes components of quality systems without relation with the impact of these components to reduce pest risk. It is just a description of quality aspects by itself
136	<b>8.2.2 Reporting and addressing nonconformities</b>	C	<i>Category : SUBSTANTIVE</i> <b>(811) Australia (30 Sep 2024 7:47 PM)</b> Consider clarification and standardised usage of the terms nonconformities and non-compliance throughout this annex.
136	<b>8.2.2 Reporting and addressing nonconformities</b>	C	<i>Category : SUBSTANTIVE</i> <b>(761) Mexico (29 Sep 2024 9:54 PM)</b> To delete text. The content refers to ISPM 45, including the type of non-compliance (critical or multiple), also ISPM 47 and ISPM 13 are not mentioned. It is important to recognize that not all NPPOs in the world have implemented ISPM 45, therefore it is necessary to leave the option to possible SA that are controlled by the NPPOs themselves.
136	<del>8.2.2 Reporting and addressing nonconformities</del>	P	<i>Category : SUBSTANTIVE</i> <b>(701) European Union (29 Sep 2024 12:53 PM)</b> ISPMs are for NPPOs (see general comment).
136	<b>8.2.2 Reporting and addressing nonconformities</b>	C	<i>Category : TECHNICAL</i> <b>(505) United States of America (19 Sep 2024 7:31 PM)</b> This section seems to confuse nonconformities with pest detections. Entities need to report both pest detections and they need to report nonconformities found in internal audits. They need to identify root cause of each and take corrective action in each case. In response to external (NPPO) audit findings of nonconformity, they also need to identify root cause and take corrective action.
136	<del>8.2.2 Reporting and addressing nonconformities</del>	P	<i>Category : SUBSTANTIVE</i> <b>(467) EPPO (15 Sep 2024 7:07 PM)</b> ISPMs are for NPPOs (see general comment).
137	Entities participating in a systems approach should have a procedure, agreed with the authorizing NPPO, for reporting detections of a <u>targeted</u> regulated pest and any corrective actions taken. Critical or multiple other nonconformities may lead to the exclusion of nonconforming parties from the systems approach.	P	<i>Category : SUBSTANTIVE</i> <b>(810) Australia (30 Sep 2024 7:46 PM)</b> Clarification of the pest being targeted in a systems approach.
137	<del>Entities participating in a systems approach should have a procedure, agreed with the authorizing NPPO, for reporting detections of a regulated pest and any corrective actions taken. Critical or multiple other nonconformities may lead to the exclusion of nonconforming parties from the systems approach.</del>	P	<i>Category : SUBSTANTIVE</i> <b>(702) European Union (29 Sep 2024 12:53 PM)</b> See European Union comment on para 136 (deletion).
137	Entities participating in a systems approach should have a procedure, agreed with the authorizing NPPO, for reporting detections of a <u>any</u> regulated pest and any corrective actions taken. Critical or multiple other nonconformities may lead to the exclusion of nonconforming parties from the systems approach.	P	<i>Category : SUBSTANTIVE</i> <b>(635) China (29 Sep 2024 5:17 AM)</b> The use of any is more accurate.
137	Entities participating in a systems approach should have a procedure, agreed with	C	<i>Category : SUBSTANTIVE</i>

	the authorizing NPPO, for reporting detections of a regulated pest and any corrective actions taken. Critical or multiple other nonconformities may lead to the exclusion of nonconforming parties from the systems approach.		<b>(598) Canada (27 Sep 2024 7:52 PM)</b> Additional clarity should be provided to consider whether the regulated pest is one that is regulated by the importing country versus one that is not known to be present in the country the entity is located. These could be quite different scenarios.
137	Entities participating in a systems approach should have a procedure, agreed with the authorizing NPPO, for reporting detections of a regulated pest and any corrective actions taken. <b>Critical or multiple other nonconformities may lead to the exclusion of nonconforming parties from the systems approach.</b>	C	<i>Category : TECHNICAL</i> <b>(507) United States of America (19 Sep 2024 7:33 PM)</b> This sentence should be moved to the end of this section.
137	Entities participating in a systems approach should have a procedure, agreed with the <del>authorizing</del> exporting NPPO, for reporting detections of a regulated pest and any corrective actions taken. Critical or multiple other nonconformities may lead to the exclusion of nonconforming parties from the systems approach.	P	<i>Category : TECHNICAL</i> <b>(506) United States of America (19 Sep 2024 7:32 PM)</b> Authorizing NPPO has not been defined here. To avoid confusion, using the terms exporting country NPPO, importing country NPPO, NPPO of the country of production, etc. maybe better for clarity and consistency.
137	<del>Entities participating in a systems approach should have a procedure, agreed with the authorizing NPPO, for reporting detections of a regulated pest and any corrective actions taken. Critical or multiple other nonconformities may lead to the exclusion of nonconforming parties from the systems approach.</del>	P	<i>Category : SUBSTANTIVE</i> <b>(468) EPPO (15 Sep 2024 7:08 PM)</b> See EPPO comment on para 136 (deletion).
137	Entities participating in a systems approach should have a procedure, agreed with the authorizing NPPO, for reporting detections of a regulated <del>pest</del> <u>pests subject to the systems approach</u> and any corrective actions taken. Critical or multiple other nonconformities may lead to the exclusion of nonconforming <del>parties</del> <u>entities</u> from the systems approach.	P	<i>Category : TECHNICAL</i> <b>(381) New Zealand (11 Sep 2024 2:22 AM)</b> To clarify that this is not all regulated pests but only the ones that are part of the systems approach
137	Entities participating in a systems approach should have a procedure, agreed with the authorizing NPPO, for reporting <del>detections of a regulated pest non</del> <u>conformities</u> and any corrective actions taken. <u>These procedures should be established by NPPOs during the design phase of the systems approach.</u> Critical or multiple other nonconformities may lead to the exclusion of nonconforming parties from the systems approach.	P	<i>Category : TECHNICAL</i> <b>(325) COSAVE (26 Aug 2024 3:33 AM)</b> Detection of regulated pests is a type of non-conformity, and procedures should established in the design phase of SA
137	Entities participating in a systems approach should have a procedure, agreed with the authorizing NPPO, for reporting detections of a regulated pest and any corrective actions taken. Critical or multiple other nonconformities may lead to the exclusion of nonconforming parties from the systems approach.	C	<i>Category : SUBSTANTIVE</i> <b>(2) Nigeria (22 Jul 2024 4:12 PM)</b> Will this be synonymous to NRO National Reporting Obligation?
138	This requirement includes pest detections at the authorized entity's facility or <del>facilities (see ISPM 45 for guidance).</del> <u>facilities</u> The entity's report to the NPPO should include a root-cause analysis to identify how the regulated pest was	P	<i>Category : SUBSTANTIVE</i> <b>(796) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b> Not relevant to ISPM 45



	introduced into the seed supply chain, any proposed adjustments to the systems approach in response to a detection, and how the effectiveness of those adjustments may be verified.		
138	<del>This requirement includes pest detections at the authorized entity's facility or facilities (see ISPM 45 for guidance). The entity's report to the NPPO should include a root cause analysis to identify how the regulated pest was introduced into the seed supply chain, any proposed adjustments to the systems approach in response to a detection, and how the effectiveness of those adjustments may be verified.</del>	P	Category : <i>SUBSTANTIVE</i> <b>(703) European Union (29 Sep 2024 12:54 PM)</b> See European Union comment on para 136 (deletion).
138	This requirement includes pest detections at the authorized entity's facility or facilities (see ISPM 45 for guidance). The entity's report to the NPPO should include a root-cause analysis to identify how the regulated pest was introduced into the seed supply chain, any proposed adjustments to the systems approach in response to a detection, and how the effectiveness of those adjustments may be verified.	C	Category : <i>SUBSTANTIVE</i> <b>(599) Canada (27 Sep 2024 7:57 PM)</b> There are circumstances where the root cause analysis cannot be done by the entity on its own. If it was imported from another country, then a notice of non-compliance would go to the NPPO of the exporting country for their follow-up. The NPPO may have to propose the adjustments to the system rather than the entity.
138	<del>This requirement includes pest detections at the authorized entity's facility or facilities (see ISPM 45 for guidance). The entity's report to the NPPO should include a root cause analysis to identify how the regulated pest was introduced into the seed supply chain, any proposed adjustments to the systems approach in response to a detection, and how the effectiveness of those adjustments may be verified.</del>	P	Category : <i>SUBSTANTIVE</i> <b>(469) EPPO (15 Sep 2024 7:08 PM)</b> See EPPO comment on para 136 (deletion).
138	<del>This requirement includes pest detections at the authorized entity's facility or facilities (see ISPM 45 for guidance). The entity's report to the NPPO should include a root-cause analysis to identify how the regulated pest was introduced into the seed supply chaincauses of non conformities, any proposed adjustments to the systems approach in response to a detection, and how the effectiveness of those adjustments may be verified.</del>	P	Category : <i>TECHNICAL</i> <b>(326) COSAVE (26 Aug 2024 3:37 AM)</b> For consistency with paragraph 137
139	<del>Procedures used to notify the NPPO of nonconformities detected while conducting internal audits in accordance with ISPM 47 and of corrective actions taken should be documented.</del>	P	Category : <i>SUBSTANTIVE</i> <b>(704) European Union (29 Sep 2024 12:54 PM)</b> See European Union comment on para 136 (deletion).
139	<del>Procedures used to notify the NPPO of nonconformities detected while conducting internal audits in accordance with ISPM 47 and of corrective actions taken should be documented.</del>	P	Category : <i>SUBSTANTIVE</i> <b>(470) EPPO (15 Sep 2024 7:08 PM)</b> See EPPO comment on para 136 (deletion).
139	Procedures used to notify the NPPO of nonconformities detected while conducting	C	Category : <i>TECHNICAL</i> <b>(382) New Zealand (11 Sep 2024 2:25 AM)</b>



	internal audits in accordance with ISPM 47 and of corrective actions taken should be documented:		These paragraphs [139] - [141] are duplicates of [119] - [121] and should be merged under 8.2.2.
140	The authorizing NPPO should be notified of any critical nonconformity <del>(see ISPM 45 and ISPM 36 for guidance)</del> during the time frame specified in the authorization agreement. The notification should include official confirmation of the pest identity and determination of the regulatory response.	P	Category : <i>SUBSTANTIVE</i> <b>(797) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b>
140	<del>The authorizing NPPO should be notified of any critical nonconformity (see ISPM 45 and ISPM 36 for guidance) during the time frame specified in the authorization agreement. The notification should include official confirmation of the pest identity and determination of the regulatory response.</del>	P	Category : <i>SUBSTANTIVE</i> <b>(705) European Union (29 Sep 2024 12:54 PM)</b> See European Union comment on para 136 (deletion).
140	The authorizing NPPO should be notified of any critical nonconformity (see ISPM 45 and ISPM 36 for guidance) during the time frame specified in the authorization agreement. <b>The notification should include official confirmation of the pest identity and determination of the regulatory response.</b>	C	Category : <i>TECHNICAL</i> <b>(508) United States of America (19 Sep 2024 7:34 PM)</b> Wouldn't "official" confirmations and determination of regulatory response be the role of NPPOs? Here it implies the participating entity does this.
140	<del>The authorizing NPPO should be notified of any critical nonconformity (see ISPM 45 and ISPM 36 for guidance) during the time frame specified in the authorization agreement. The notification should include official confirmation of the pest identity and determination of the regulatory response.</del>	P	Category : <i>SUBSTANTIVE</i> <b>(471) EPPO (15 Sep 2024 7:09 PM)</b> See EPPO comment on para 136 (deletion).
140	The authorizing NPPO should be notified of any critical nonconformity (see ISPM <del>45 and ISPM 36 for guidance</del> <u>45</u> ) during the time frame specified in the authorization agreement. The notification should include official confirmation of the pest identity and determination of the regulatory response.	P	Category : <i>TECHNICAL</i> <b>(327) COSAVE (26 Aug 2024 3:38 AM)</b> ISPM 36 does not apply to seeds
141	<del>The entity should document the procedure by which it notifies the authorizing NPPO of any other nonconformities within the time frame agreed by the NPPO and the entity.</del>	P	Category : <i>SUBSTANTIVE</i> <b>(706) European Union (29 Sep 2024 12:55 PM)</b> See European Union comment on para 136 (deletion).
141	<del>The entity should document the procedure by which it notifies the authorizing NPPO of any other nonconformities within the time frame agreed by the NPPO and the entity.</del>	P	Category : <i>TECHNICAL</i> <b>(541) United States of America (23 Sep 2024 5:02 PM)</b> Redundant with para 139.
141	The entity should document the procedure by which it notifies the authorizing NPPO of any other nonconformities within the time frame agreed by the NPPO and the entity.  <u>9. Records that demonstrate implementation</u>	P	Category : <i>SUBSTANTIVE</i> <b>(524) Japan (20 Sep 2024 12:25 PM)</b> Documentation of records that demonstrate implementation is necessary to check if the measures of the systems approach have been implemented. The proposed text is based on draft ISPM 39 annex "use of systems approaches in managing the pest risk associated with the movement of wood" paragraph 201.


	<u>NPPOs and participating entities should record the measures that have been applied in implementing the systems approach and should retain these records to demonstrate the implementation of the systems approach. The retention time of these records should be agreed between the participating NPPOs.</u>		
141	<del>The entity should document the procedure by which it notifies the authorizing NPPO of any other nonconformities within the time frame agreed by the NPPO and the entity.</del>	P	Category : TECHNICAL <b>(509) United States of America (19 Sep 2024 7:35 PM)</b> Redundant with para 139.
141	<del>The entity should document the procedure by which it notifies the authorizing NPPO of any other nonconformities within the time frame agreed by the NPPO and the entity.</del>	P	Category : SUBSTANTIVE <b>(472) EPPO (15 Sep 2024 7:09 PM)</b> See EPPO comment on para 136 (deletion).
141	The entity should document the procedure by which it notifies the authorizing NPPO of any other nonconformities within the time frame agreed by the NPPO and the entity.  <u>In relation to non-conformities detected by the NPPO of the importing country, the notification should follow the requirements of ISPM 13</u>	P	Category : TECHNICAL <b>(328) COSAVE (26 Aug 2024 3:40 AM)</b> For consistency
142	<b>Potential implementation issues</b>	C	Category : EDITORIAL <b>(798) Caribbean Agricultural Health and Food Safety Agency (30 Sep 2024 3:27 PM)</b> Developing countries will have resource as well as personnel challenges in the implementation of this annex.
142	<b>Potential implementation issues</b>	C	Category : SUBSTANTIVE <b>(600) Canada (27 Sep 2024 8:01 PM)</b> Given the complex nature of this annex, a guide or supporting implementation material would be beneficial to help CPs implement this Annex.
142	<b>Potential implementation issues</b>	C	Category : TECHNICAL <b>(510) United States of America (19 Sep 2024 7:37 PM)</b> Industry participation in developing various manuals and other tools (e.g., presentations, videos) on production practices, quality systems, including case studies about working with NPPOs (e.g. ReFreSH) will be very helpful.
143	This section is not part of the standard. The Standards Committee in May 2016 requested the Secretariat to gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues.	C	Category : SUBSTANTIVE <b>(525) Japan (20 Sep 2024 12:26 PM)</b> For implementation, how to set "performance criteria" may be needed. ISPM 45 section 4.1 (Roles and responsibilities of the NPPO) mentions that responsibility of NPPO includes to clearly define the performance criteria, but the content of the performance criteria is not stated in this draft.



145	<b>APPENDIX 1 OF ANNEX 1: An example of critical control points along the seed supply chain where seed pest risk considerations exist and pest risk can be managed by the regulatory actions of NPPOs together with the actions of participating entities</b>	C	<p><i>Category : SUBSTANTIVE</i>  <b>(823) Australia (30 Sep 2024 8:23 PM)</b>          If a multilateral systems approach is agreed in the future, consider inclusion of a diagram in the appendix to show the complexity of this system.</p>
145	<del>APPENDIX 1 OF ANNEX 1: An example of critical control points along the seed supply chain where seed pest risk considerations exist and pest risk can be managed by the regulatory actions of NPPOs together with the actions of participating entities</del>	P	<p><i>Category : SUBSTANTIVE</i>  <b>(707) European Union (29 Sep 2024 12:57 PM)</b>          Appendix 1 is redundant with section 2.3 so it is suggested to delete it.</p> <p>If this deletion is not accepted, please use exactly the same wording in Appendix 1 as in section 2.3 because there are many inconsistencies, which is confusing.</p> <p>The diagram could be included in guidance but is already available as a ReFreSH publication.</p>
145	<del>APPENDIX 1 OF ANNEX 1: An example of critical control points along the seed supply chain where seed pest risk considerations exist and pest risk can be managed by the regulatory actions of NPPOs together with the actions of participating entities</del>	P	<p><i>Category : SUBSTANTIVE</i>  <b>(455) EPPO (15 Sep 2024 5:49 PM)</b>          Appendix 1 is redundant with section 2.3 so it is suggested to delete it.</p> <p>If this deletion is not accepted, please use exactly the same wording in Appendix 1 as in section 2.3 because there are many inconsistencies, which is confusing.</p> <p>The diagram could be included in guidance but is already available as a ReFreSH publication.</p>




**2024 FIRST CONSULTATION 1 July – 30 September 2024****Compiled comments for Draft annex to ISPM 38 (*International movement of seeds*) on the design and use of systems approaches (2018-009) - Spanish****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
G	(General Comment)	C	Category : <i>SUBSTANTIVE</i> <b>(276) Dominican Republic (22 Aug 2024 4:14 PM)</b> Estamos de acuerdo con los comentarios y cambios acordados durante el taller IPPC LATAM.
G	(General Comment)	C	Category : <i>EDITORIAL</i> <b>(261) IPPC Regional Workshop Africa (21 Aug 2024 1:39 PM)</b> No Comments
G	(General Comment)	C	Category : <i>SUBSTANTIVE</i>  OIRSA <b>(196) OIRSA (19 Aug 2024 2:44 AM)</b> Se solicita revisar en todo el cuerpo del proyecto de anexo a fin de excluir aspectos de calidad de la semilla.
G	(General Comment)	C	Category : <i>TECHNICAL</i>  OIRSA <b>(30) Uruguay (9 Aug 2024 2:57 PM)</b> Cambio global: sugerimos usar el termino "practicas" para referirse a las practicas de producción aplicadas por las entidades participantes en un enfoque de sistemas y usar el término "medidas" cuando esas practicas son integradas en un enfoque de sistemas
G	(General Comment)	C	Category : <i>TECHNICAL</i> <b>(4) Ecuador (31 Jul 2024 7:10 PM)</b> Para tener relación con la NIMF 38 el titulo debería también contener el termino semillas (como producto)  Propuesta de texto: PROYECTO DE ANEXO DE LA NIMF 38: Diseño y utilización de enfoques de sistemas para la certificación fitosanitaria de semillas (como producto)
1	<b>PROYECTO DE ANEXO DE LA NIMF 38: DISEÑO Y UTILIZACIÓN DE ENFOQUES DE SISTEMAS PARA LA CERTIFICACIÓN FITOSANITARIA DE SEMILLAS (2018-009)</b>	C	Category : <i>SUBSTANTIVE</i> <b>(342) Honduras (8 Sep 2024 7:05 PM)</b> Estamos de acuerdo con los comentarios y cambios acordados durante el taller IPPC LATAM

1	<b>PROYECTO DE ANEXO DE LA NIMF 38: DISEÑO Y UTILIZACIÓN DE ENFOQUES DE SISTEMAS PARA LA CERTIFICACIÓN FITOSANITARIA DE SEMILLAS (2018-009)</b>	C	Category : <i>SUBSTANTIVE</i> <b>(277) Dominican Republic (22 Aug 2024 5:49 PM)</b> Los comentarios propuestos en este documento por OIRSA, son aceptados por este país.
31	<b>1. Introducción</b> <b><u>1.1 Ambito</u></b>	P	Category : <i>TECHNICAL</i> <b>(8) Uruguay (9 Aug 2024 4:45 AM)</b> Por consistencia con e Anexo a la NIMF 39 que esta a consulta
32	El presente anexo proporciona un marco general y normalizado de los requisitos para las organizaciones nacionales de protección fitosanitaria (ONPF) en el caso de que elaboren enfoques de sistemas para semillas como una opción de certificación fitosanitaria. El reconocimiento de un enfoque de sistemas por las ONPF podrá sentar las bases de la certificación fitosanitaria de semillas y servirá como alternativa a medidas individuales como el tratamiento o el análisis de semillas al emitir un certificado fitosanitario. En el presente anexo se describen la función y las responsabilidades de las ONPF en un enfoque de sistemas para las semillas y, si procede, la función y las responsabilidades de las entidades participantes.	C	Category : <i>TECHNICAL</i>  Honduras <b>(344) Honduras (8 Sep 2024 10:01 PM)</b> Es importante establecer que la opcion de uso de enfoque de sistemas es para el manejo del riesgo
32	El presente anexo proporciona un marco general y normalizado de los requisitos para las organizaciones nacionales de protección fitosanitaria (ONPF) en el caso de que elaboren enfoques de sistemas para semillas como una opción de certificación fitosanitaria. El reconocimiento de un enfoque de sistemas por las ONPF podrá sentar las bases de la certificación fitosanitaria de semillas y servirá como alternativa a medidas individuales como el tratamiento o el análisis de semillas al emitir un certificado fitosanitario. En el presente anexo se describen la función y las responsabilidades de las ONPF en un enfoque de sistemas para las semillas y, si procede, la función y las responsabilidades de las entidades participantes.	C	Category : <i>SUBSTANTIVE</i> <b>(343) Honduras (8 Sep 2024 7:07 PM)</b> Honduras repalda los comentarios resumen de la Region de OIRSA
32	El presente anexo proporciona un marco general y normalizado de los requisitos para las organizaciones nacionales de protección fitosanitaria (ONPF) en el caso de que elaboren enfoques de sistemas para semillas como una opción <del>de certificación fitosanitaria</del> <u>para el manejo del riesgo</u> . El reconocimiento de un enfoque de sistemas por las ONPF podrá sentar las bases de la certificación fitosanitaria de semillas y servirá como alternativa a medidas individuales como el tratamiento o el análisis de semillas al emitir un certificado fitosanitario. En el presente anexo se describen <del>la función</del> <u>las funciones</u> y las responsabilidades de las ONPF en un enfoque de sistemas para las <del>semillas y semillas, si procede, la función además de las funciones</del>	P	Category : <i>TECHNICAL</i>  OIRSA <b>(197) OIRSA (19 Aug 2024 2:48 AM)</b> En concordancia con la NIMF 14



	y las responsabilidades de las entidades participantes.		
32	El presente anexo proporciona un marco general <del>y normalizado</del> de los requisitos para las organizaciones nacionales de protección fitosanitaria (ONPF) en el caso de que elaboren enfoques de sistemas para semillas como una opción de <del>certificación fitosanitaria. El reconocimiento-manejo de un enfoque-riesgo de sistemas por las ONPF podrá sentar las bases de la certificación fitosanitaria de semillas y servirá</del> plagas como una alternativa a medidas <del>fitosanitarias</del> individuales como el tratamiento o el análisis de <del>semillas al emitir semillas. Este Anexo describe los elementos esenciales de un certificado fitosanitario</del> enfoque de sistemas para las semillas que pueden ser las prácticas ya utilizadas por las entidades. Las ONPF podrán elaborar, evaluar y aprobar el enfoque de sistemas resultante como forma de cumplir los requisitos fitosanitarios de importación y, por consiguiente como fundamento de la certificación fitosanitaria. En el presente anexo se describen la función y las responsabilidades de las ONPF <del>en un enfoque de sistemas para las semillas y, si procede, la función</del> y las responsabilidades de las entidades participantes.	P	<p>Category : SUBSTANTIVE</p> <p> OIRSA</p> <p><b>(61) Uruguay (13 Aug 2024 10:08 PM)</b></p> <p>1) Normalizado se elimina por que es redundante, 2) El enfoque de sistemas es una opción para el manejo de riesgo de plagas no para la certificación fitosanitaria, 3) La segunda frase fue eliminada como consecuencia de los cambios propuestos en la primera frase del párrafo, 3) El texto agregado proviene del párrafo 40 el cual fue modificado para agregar que el Enfoque de sistemas resultante puede ser elaborado por las ONPF en consistencia con el párrafo 47, 4) "si procede" eliminado en la ultima frase por que el borrador describe las responsabilidades de las entidades</p>
32	El presente anexo proporciona un marco general y normalizado de los requisitos para las organizaciones nacionales de protección fitosanitaria (ONPF) en el caso de que elaboren enfoques de sistemas para semillas como una opción de certificación fitosanitaria. El reconocimiento de un enfoque de sistemas por las ONPF podrá sentar las bases de la certificación fitosanitaria de semillas y servirá como alternativa a medidas individuales como el tratamiento o el análisis de semillas al emitir un certificado fitosanitario. En el presente anexo se describen la función y las responsabilidades de las ONPF en un enfoque de sistemas para las semillas <del>y, si procede, la función y las responsabilidades</del> de las entidades participantes.	P	<p>Category : TECHNICAL</p> <p><b>(42) CA (13 Aug 2024 8:00 PM)</b></p> <p>Para mayor precisión, se propone la eliminación, debido a que el anexo debe ser preciso con la responsabilidad de los actores que participan en el proceso</p>
33	Los enfoques de sistemas podrán incluir, además de las medidas fitosanitarias utilizadas habitualmente, componentes de las prácticas de producción y los sistemas de garantía de la calidad existentes empleados por las entidades participantes, siempre que guarden relación con el manejo de plagas. Estos componentes pueden reducir eficazmente el riesgo de plagas a un nivel que permita cumplir los requisitos fitosanitarios de importación evaluados por las ONPF. Cuando dichos componentes se utilizan en un enfoque de sistemas, las ONPF deberían colaborar estrechamente con las entidades participantes y encargarse de identificar el riesgo de plagas, establecer el nivel aceptable de riesgo de plagas para determinadas plagas, diseñar el sistema, evaluar la eficacia de los componentes de	C	<p>Category : TECHNICAL</p> <p><b>(345) Honduras (8 Sep 2024 10:05 PM)</b></p> <p>Los enfoques de sistemas que integran las medidas para el manejo del riesgo de plagas en forma concreta podrían ofrecer una alternativa al uso de una sola medida para lograr el nivel apropiado de protección fitosanitaria de un país importador</p>


	las prácticas de producción y los sistemas de garantía de la calidad para reducir el riesgo de plagas y controlar si esta eficacia se mantiene a lo largo de toda la cadena de suministro de semillas.		
33	Los enfoques de sistemas podrán incluir, además de las medidas fitosanitarias utilizadas habitualmente, componentes de las prácticas de producción y los sistemas de garantía de la calidad existentes empleados por las entidades participantes, siempre que guarden relación con el manejo de plagas. Estos componentes pueden reducir eficazmente el riesgo de plagas a un nivel que permita cumplir los requisitos fitosanitarios de importación evaluados por las ONPF. Cuando dichos componentes se utilizan en un enfoque de sistemas, las ONPF deberían colaborar estrechamente con las entidades participantes y encargarse de identificar el riesgo de plagas, establecer el nivel aceptable de riesgo de <del>plagas para</del> determinadas plagas, diseñar el sistema, evaluar la eficacia de los componentes de las prácticas de producción y los sistemas de garantía de la calidad para reducir el riesgo de plagas y <del>controlar-verificar</del> si esta eficacia se mantiene a lo largo de toda la cadena de suministro de semillas.	P	<p>Category : <i>TECHNICAL</i></p> <p> OIRSA  <b>(198) OIRSA (19 Aug 2024 2:50 AM)</b>  claridad del párrafo</p>
33	Los enfoques de sistemas podrán incluir, además de las medidas fitosanitarias utilizadas habitualmente, componentes de las prácticas de producción y los sistemas de garantía de la calidad existentes empleados por las entidades participantes, siempre que guarden relación con el manejo de plagas. Estos componentes pueden reducir eficazmente el riesgo de plagas a un nivel que permita cumplir los requisitos fitosanitarios de importación evaluados por las ONPF. <u>Cuando-Por consiguiente cuando</u> dichos componentes se utilizan en un enfoque de sistemas, las ONPF deberían colaborar estrechamente con las entidades participantes y encargarse de identificar el riesgo de plagas, establecer el nivel aceptable de riesgo de plagas para determinadas plagas, diseñar el sistema, evaluar la eficacia de los componentes de las prácticas de producción y los sistemas de garantía de la calidad para reducir el riesgo de plagas y controlar si esta eficacia se mantiene a lo largo de toda la cadena de suministro de semillas.	P	<p>Category : <i>SUBSTANTIVE</i></p> <p><b>(44) CA (13 Aug 2024 8:07 PM)</b>  Para mayor concordancia en el párrafo.</p>
33	Los enfoques de sistemas podrán incluir, además de las medidas fitosanitarias utilizadas habitualmente, componentes de las prácticas de producción y los sistemas de garantía de la calidad existentes empleados por las entidades participantes, siempre que guarden relación con el manejo de plagas. Estos componentes <del>pueden reducir</del> <u>podrán ser incluidos una vez que se compruebe que</u>	P	<p>Category : <i>SUBSTANTIVE</i></p> <p> OIRSA  <b>(43) CA (13 Aug 2024 8:06 PM)</b>  "podrán ser incluidos, una vez se compruebe que reducen ", debido a que las prácticas de producción a considerar deberían ser verificados por las partes contratantes para su aceptación.</p>

	<u>reducen</u> eficazmente el riesgo de plagas a un nivel que permita cumplir los requisitos fitosanitarios de importación evaluados por las ONPF. Cuando dichos componentes se utilizan en un enfoque de sistemas, las ONPF deberían colaborar estrechamente con las entidades participantes y encargarse de identificar el riesgo de plagas, establecer el nivel aceptable de riesgo de plagas para determinadas plagas, diseñar el sistema, evaluar la eficacia de los componentes de las prácticas de producción y los sistemas de garantía de la calidad para reducir el riesgo de plagas y controlar si esta eficacia se mantiene a lo largo de toda la cadena de suministro de semillas.		
33	Los enfoques de sistemas podrán <del>incluir, además de las medidas fitosanitarias utilizadas habitualmente, incluir</del> componentes de las prácticas de producción <u>de semillas</u> y los sistemas de garantía de la calidad existentes empleados por las entidades participantes, siempre que guarden relación con el manejo de plagas. Estos componentes pueden reducir eficazmente el riesgo de plagas <del>a un nivel</del> que permita cumplir los requisitos fitosanitarios de <del>importación evaluados por las ONPF</del> <u>importación</u> . Cuando dichos componentes se <del>utilizan integran</del> en un enfoque de sistemas, las ONPF deberían <del>colaborar estrechamente con las entidades participantes y</del> encargarse de <del>identificar evaluar</del> el riesgo de plagas, establecer <del>el nivel aceptable los requisitos fitosanitarios de riesgo de plagas para determinadas plagas</del> <u>importación</u> , diseñar el sistema, evaluar la eficacia de los componentes de las prácticas de producción y los sistemas de garantía de la calidad para reducir el riesgo de plagas y controlar si esta eficacia se mantiene a lo largo de toda la cadena de suministro de semillas.	P	<p>Category : TECHNICAL</p> <p> OIRSA</p> <p><b>(40) Uruguay (11 Aug 2024 2:40 PM)</b></p> <p>1) Los enfoques de sistemas son una opción que integran al menos dos medidas independientes y como sistema cumple con los requisitos fitosanitarios de importación. "Medidas comúnmente usadas" es confuso ya que puede interpretarse como medidas fitosanitarias usadas como medidas individuales, 2) "suficiente" es redundante, si cumple los requisitos es suficiente, 3) Un enfoque de sistemas es una medida fitosanitaria alternativa que es evaluada primero por la ONPF. La selección de las medidas en el enfoque de sistemas debería acordarse entre la ONPF del país importador y la del país exportador y las entidades involucradas deberían colaborar con las ONPF y no al revés</p>
36	“cadena de suministro de semillas”, que engloba todos los pasos relacionados con la producción y el movimiento de semillas (esto es, desde los procesos previos a la <u>plantación, durante la</u> plantación y los procedimientos en el país de <del>origen, pasando por todos los procesos origen y procedimientos</del> posteriores que tienen lugar en diferentes países, según proceda);	P	<p>Category : EDITORIAL</p> <p><b>(199) OIRSA (19 Aug 2024 2:52 AM)</b></p> <p>mejor comprensión del párrafo</p>
37	<del>“país exportador”, que se refiere al país de origen y a los países de reexportación;</del>	P	<p>Category : TECHNICAL</p> <p> OIRSA</p> <p><b>(9) Uruguay (9 Aug 2024 5:00 AM)</b></p> <p>Esta definición es confusa ya que el país de re-exportación no es un país exportador en el contexto fitosanitario</p>
38	<del>“país importador”, que se refiere a los países de reexportación y el país de destino final.</del>	P	<p>Category : TECHNICAL</p> <p> OIRSA</p> <p><b>(10) Uruguay (9 Aug 2024 5:03 AM)</b></p>


			Esta definición es confusa ya que el país re-exportador no es un país importador en el contexto fitosanitario
39	<b>1.1 Ámbito</b>	P	Category : TECHNICAL  OIRSA <b>(11) Uruguay (9 Aug 2024 5:05 AM)</b> Este título se movió al comienzo de la sección
40	Este anexo es aplicable a todas las semillas que se mueven <del>internacionalmente con cualquier finalidad internacionalmente</del> . En él se describen los elementos esenciales de un enfoque de sistemas para las semillas, que <del>pueden-pudieran</del> ser las medidas y prácticas ya utilizadas por las entidades. Las ONPF podrán evaluar y <u>adicionar cada una de las medidas fitosanitarias y</u> aprobar el enfoque de sistemas resultante como forma de cumplir los requisitos fitosanitarios de importación y, por consiguiente, como fundamento de la certificación fitosanitaria.	P	Category : TECHNICAL  OIRSA <b>(200) OIRSA (19 Aug 2024 2:54 AM)</b> claridad del párrafo
40	<del>Este anexo es aplicable a todas las semillas que se mueven internacionalmente con cualquier finalidad. En él se describen los elementos esenciales de un enfoque de sistemas para las semillas, que pueden ser las medidas y prácticas ya utilizadas por las entidades. Las ONPF podrán evaluar y aprobar el enfoque de sistemas resultante como forma de cumplir los requisitos fitosanitarios de importación y, por consiguiente, como fundamento de la certificación fitosanitaria.</del>	P	Category : TECHNICAL <b>(12) Uruguay (9 Aug 2024 5:08 AM)</b> Se elimina el párrafo para evitar redundancia con la modificación propuesta por Uruguay en el párrafo 32
41	De conformidad con el texto principal de la presente norma, muchas de las prácticas de manejo de plagas utilizadas en la producción de semillas se podrán integrar en un enfoque de sistemas con vistas a reducir el riesgo de plagas en todo el proceso de producción de semillas, desde la plantación hasta <del>la recolección</del> <u>el envío</u> , lo que ayudará a cumplir los requisitos fitosanitarios de importación.	P	Category : EDITORIAL <b>(201) OIRSA (19 Aug 2024 2:54 AM)</b>
41	<del>De conformidad con el texto principal de la presente norma, muchas de las prácticas de manejo de plagas utilizadas en la producción de semillas se podrán integrar en un enfoque de sistemas con vistas a reducir el riesgo de plagas en todo el proceso de producción de semillas, desde la plantación hasta la recolección, lo que ayudará a cumplir los requisitos fitosanitarios de importación.</del>	P	Category : TECHNICAL  OIRSA <b>(13) Uruguay (9 Aug 2024 5:10 AM)</b> Para evitar redundancia con el texto central de la NIMF 38, no es necesario incluir texto de la NIMF en el Anexo
42	Las opciones de manejo del riesgo de plagas que se describen en este anexo se podrán aplicar a plagas o grupos de plagas y deberían considerarse suficiente para cumplir los requisitos fitosanitarios de importación de los países importadores cuando se integren en un enfoque de sistemas. <del>Este enfoque es coherente con los conceptos y los enfoques descritos en la NIMF 36, Medidas integradas para plantas para plantar, que no engloba las semillas.</del> Si la ONPF del país importador	P	Category : TECHNICAL  OIRSA <b>(264) OIRSA (21 Aug 2024 8:08 PM)</b> para clarificar


	tiene <del>indicaciones evidencias</del> de que las medidas integradas en el enfoque de sistemas no <del>permiten hacer frente manejan</del> debidamente <del>al-el</del> riesgo de plagas <del>planteado por una plaga reglamentada particular</del> y, por consiguiente, no cumplen sus requisitos fitosanitarios de importación, debería considerar <u>la integración de otras medidas adicionales</u> con la ONPF del país de origen.		
42	Las opciones de manejo del riesgo de plagas que se describen en este anexo se podrán aplicar a plagas o grupos de plagas y deberían considerarse suficiente para cumplir los requisitos fitosanitarios de importación de los países importadores cuando se integren en un enfoque de sistemas. Este enfoque es coherente con los conceptos y los enfoques descritos en la NIMF 36, <i>Medidas integradas para plantas para plantar</i> , <del>que no engloba las semillas. Si la ONPF del país importador tiene indicaciones de que las medidas integradas en el enfoque de sistemas no permiten hacer frente debidamente al riesgo de plagas planteado por una plaga reglamentada particular y, por consiguiente, no cumplen sus requisitos fitosanitarios de importación, debería considerar medidas adicionales con la ONPF del país de origen.</del> <u>NIMF 14, Aplicación de medidas integradas en un enfoque de sistemas para el manejo del riesgo de plagas, que no engloba las semillas. Si la ONPF del país importador tiene evidencia de que las medidas integradas en el enfoque de sistemas no permiten hacer frente debidamente al riesgo de plagas planteado por una plaga reglamentada particular y, por consiguiente, no cumplen sus requisitos fitosanitarios de importación, debería considerar medidas adicionales con la ONPF del país de origen.</u>	P	<i>Category : TECHNICAL</i> <b>(202) OIRSA (19 Aug 2024 2:56 AM)</b>
42	Las opciones de manejo del riesgo de plagas que se describen en este anexo se podrán aplicar a plagas o grupos de plagas y deberían considerarse suficiente para cumplir los requisitos fitosanitarios de importación de los países importadores cuando se integren en un enfoque de sistemas. Este enfoque es coherente con los conceptos y los enfoques descritos en la NIMF 36, <i>Medidas integradas para plantas para plantar</i> , que no engloba las semillas. Si la ONPF del país importador tiene indicaciones de que las medidas integradas en el enfoque de sistemas no permiten hacer frente debidamente al riesgo de plagas planteado por una plaga reglamentada particular y, por consiguiente, no cumplen sus requisitos fitosanitarios de importación, debería considerar medidas adicionales con la ONPF del país de origen.  <u>El presente anexo no se centra en ninguna especie de semillas en particular, sino</u>	P	<i>Category : TECHNICAL</i> <b>(15) Uruguay (9 Aug 2024 5:33 AM)</b> Párrafo 45 movido y modificado. Si bien la definición de producto en la NIMF 5 incluye el movimiento con otros propósitos además del comercio, en industria semillera el término producto se asocia únicamente a comercio. Por tal motivo se sugiere usar especies de semillas en este caso en particular. Comercio de semillas se reemplazó por movimiento internacional de semillas por consistencia con el texto principal de la NIMF 38


	<u>que trata sobre determinadas características del movimiento internacional de semillas, como que los períodos en los que las semillas se pueden almacenar y entregar a diferentes clientes en diferentes países pueden llegar a ser prolongados</u>		
42	<del>Las opciones de</del> Los componentes relacionados con el manejo del riesgo de plagas que se describen en este anexo se podrán aplicar a plagas o grupos de plagas y deberían considerarse suficiente para cumplir los requisitos fitosanitarios de importación de los países importadores cuando se integren en un enfoque de sistemas. <del>Este enfoque es coherente con los conceptos y los enfoques descritos en la NIMF 36, Medidas integradas para plantas para plantar, que no engloba las semillas.</del> Si la ONPF del país importador tiene indicaciones de que las medidas integradas en el enfoque de sistemas no permiten <del>hacer frente</del> <u>manejar</u> debidamente al riesgo de plagas <del>planteado por una plaga reglamentada particular</del> y, por consiguiente, no cumplen sus requisitos fitosanitarios de importación, debería considerar <u>la integración de otras</u> medidas <del>adicionales</del> con la ONPF del país de origen.	P	Category : TECHNICAL <b>(14) Uruguay (9 Aug 2024 5:20 AM)</b> Por consistencia son los componentes relacionados con el manejo de riesgo de plagas. La referencia a la NIMF 36 es innecesaria considerando que dicha norma no aplica a semillas, El último cambio es por consistencia y aclarar que las medidas que se van a discutir son las medidas que se integraran al Enfoque de sistemas
44	En la NIMF 14, <i>Aplicación de medidas integradas en un enfoque de sistemas para el manejo del riesgo de plagas</i> , se describe la elaboración de un enfoque de sistemas como un proceso bilateral en el que intervienen la ONPF del país importador y la del país exportador, además de las partes interesadas del sector. Las ONPF de varios países también podrán elaborar conjuntamente un enfoque de sistemas para las exportaciones e importaciones de sus países. Si se llega al mismo enfoque de sistemas para estos países, este se convierte en un enfoque de sistemas multilateral, que podrá acomodarse al carácter multinacional del <del>comercio</del> <u>movimiento internacional</u> de semillas. <del>Es probable que los beneficios de los enfoques de sistemas multilaterales, en los que participan múltiples países exportadores e importadores, sean mayores cuanto más países participen en él, lo que hace que el movimiento de semillas sea más predecible.</del>	P	Category : TECHNICAL  OIRSA <b>(16) Uruguay (9 Aug 2024 5:46 AM)</b> La previsibilidad no es una cuestión de efecto acumulativo debido a un mayor número de participantes. La fiabilidad y la previsibilidad de un enfoque de sistemas son independientes del número de participantes, pero dependen de las medidas integradas adecuadas seleccionadas.
45	<del>El presente anexo no se centra en ninguna especie de semillas en particular, sino que trata sobre determinadas características de movimiento internacional de semillas, como es el caso de países que producen semillas para ser almacenadas y reacondicionadas en su país o en otros países para ser distribuida y reexportada a diferentes países en un periodo indeterminado. Como orientación general para elaborar un enfoque de sistemas para las semillas, el presente anexo no se centra en ningún producto de semillas en particular, sino que trata sobre determinadas</del>	P	Category : TECHNICAL  OIRSA <b>(265) OIRSA (21 Aug 2024 8:22 PM)</b> Consistente con la NIMF 38 y mayor claridad




	<del>características del comercio de semillas, como que los períodos en los que las semillas se pueden almacenar y entregar a diferentes clientes en diferentes países pueden llegar a ser prolongados.</del>		
45	Como orientación general para elaborar un enfoque de sistemas para las semillas, el presente anexo no se centra en ningún producto de semillas en particular, sino que trata sobre determinadas características del comercio de semillas, como <u>es el caso de países que los períodos en los que las producen</u> semillas <u>se pueden almacenar para ser almacenadas y entregar a diferentes clientes reacondicionadas en diferentes su país o en otros países pueden llegar a para ser</u> <u>prolongados distribuida y reexportadas a diferentes países en un período indeterminado</u>	P	Category : TECHNICAL <b>(203) OIRSA (19 Aug 2024 2:58 AM)</b> claridad del párrafo
45	<del>Como orientación general para elaborar un enfoque de sistemas para las semillas, el presente anexo no se centra en ningún producto de semillas en particular, sino que trata sobre determinadas características del comercio de semillas, como que los períodos en los que las semillas se pueden almacenar y entregar a diferentes clientes en diferentes países pueden llegar a ser prolongados.</del>	P	Category : TECHNICAL <b>(17) Uruguay (9 Aug 2024 5:49 AM)</b> Párrafo 45 se movió después del párrafo 42 porque el texto está mas alineado con el ámbito
46	<del>Las ONPF elaboran los enfoques de sistemas considerando todos los puntos críticos de control a lo largo de la cadena de suministro de semillas donde se pueden reducir y monitorear los riesgos de plagas específicos. Uno de los requisitos del marco es que cada una de las entidades que participan en el enfoque de sistemas debería estar autorizada por la ONPF del país de origen, de acuerdo con la NIMF 45. El marco se basa en combinar medidas que, además de las medidas fitosanitarias utilizadas habitualmente, podrán incluir componentes de las prácticas de producción y los sistemas de garantía de la calidad existentes empleados por las entidades participantes. Las ONPF elaboran los enfoques de sistemas resultantes, considerando todos los puntos críticos de control a lo largo de la cadena de suministro de semillas. Uno de los requisitos del marco es que cada una de las entidades que participan en el enfoque de sistemas debería estar autorizada por la ONPF del país de origen.</del>	P	Category : TECHNICAL  <b>OIRSA (62) Uruguay (13 Aug 2024 10:22 PM)</b> 1) Primera frase eliminada por que ya fue mencionado en el párrafo 33, 2) se agrega texto en la segunda frase para alinear con la NIMF 14 y para aclarar el uso de los CCP en relacion al manejo del riesgo de plagas, 3) Se agrega referencia a NIMF 45 por ser relevante <b>OIRSA (21 Aug 2024 8:31 PM)</b> De acuerdo: quitar la parte NIMF 45
46	El marco se basa en combinar medidas que, además de las medidas fitosanitarias utilizadas habitualmente, podrán incluir componentes de las prácticas de producción y los sistemas de garantía de la calidad existentes empleados por las entidades participantes. Las ONPF elaboran los enfoques de sistemas resultantes, considerando todos los puntos críticos de control a lo largo de la cadena de	P	Category : TECHNICAL <b>(204) OIRSA (19 Aug 2024 2:59 AM)</b>


	suministro de semillas. <u>producción, cosecha, almacenamiento y transporte</u> . Uno de los requisitos del marco es que cada una de las entidades que participan en el enfoque de sistemas debería estar autorizada por la ONPF del país de origen.		
46	El marco se basa en combinar medidas <del>que, además de como alternativa a</del> las medidas fitosanitarias utilizadas habitualmente, podrán incluir componentes de las prácticas de producción y los sistemas de garantía de la calidad existentes empleados por las entidades participantes. Las ONPF elaboran los enfoques de sistemas resultantes, considerando todos los puntos críticos de control a lo largo de la cadena de suministro de semillas. Uno de los requisitos del marco es que cada una de las entidades que participan en el enfoque de sistemas debería estar autorizada por la ONPF del país de origen.	P	<i>Category : TECHNICAL</i> <b>(45) CA (13 Aug 2024 8:12 PM)</b> En concordancia párrafo 1, introducción
46	<u>Las ONPF elaboran los enfoques de sistemas resultantes, considerando todos los puntos críticos de control a lo largo de la cadena de suministro de semillas donde los riesgos de plagas pueden ser reducidos y monitoreados. Uno de los requisitos del marco es que cada una de las entidades que participan en el enfoque de sistemas debería estar autorizada por la ONPF del país de origen, de acuerdo con la NIMF 45 (Requisitos para las organizaciones nacionales de protección fitosanitaria cuando autoricen a entidades para ejecutar acciones fitosanitarias).</u> <del>El marco se basa en combinar medidas que, además de las medidas fitosanitarias utilizadas habitualmente, podrán incluir componentes de las prácticas de producción y los sistemas de garantía de la calidad existentes empleados por las entidades participantes. Las ONPF elaboran los enfoques de sistemas resultantes, considerando todos los puntos críticos de control a lo largo de la cadena de suministro de semillas. Uno de los requisitos del marco es que cada una de las entidades que participan en el enfoque de sistemas debería estar autorizada por la ONPF del país de origen.</del>	P	<i>Category : TECHNICAL</i> <b>(18) Uruguay (9 Aug 2024 5:57 AM)</b> Se elimina texto que ya fue mencionado en el párrafo 33. Se sugiere agregar la referencia a la NIMF 45 por ser relevante
47	Se podrá utilizar un enfoque de sistemas como alternativa equivalente a los tratamientos fitosanitarios individuales para manejar el riesgo de plagas (véase la NIMF 14) asociado al movimiento de semillas. Los enfoques de sistemas que se utilicen deberían estar elaborados <u>o aprobados</u> por las ONPF. <del>En el presente anexo se señalan las responsabilidades de las ONPF y, si procede, los requisitos básicos de cada una de las entidades participantes en el enfoque de sistemas.</del>	P	<i>Category : TECHNICAL</i> <b>(205) OIRSA (19 Aug 2024 3:00 AM)</b>
47	Se podrá utilizar un enfoque de sistemas como alternativa equivalente a los tratamientos fitosanitarios individuales para manejar el riesgo de plagas (véase la	P	<i>Category : EDITORIAL</i> <b>(46) CA (13 Aug 2024 8:14 PM)</b> Se propone la eliminación de forma debido, a que ya se hace mención en el párrafo


	NIMF 14) asociado al movimiento de semillas. Los enfoques de sistemas que se utilicen deberían estar elaborados por las ONPF. <del>En el presente anexo se señalan las responsabilidades de las ONPF y, si procede, los requisitos básicos de cada una de las entidades participantes en el enfoque de sistemas.</del>		1 dela introducción.
47	<del>Se podrá utilizar un enfoque de sistemas como alternativa equivalente a los tratamientos fitosanitarios individuales para manejar el riesgo de plagas (véase la NIMF 14) asociado al movimiento de semillas. Los enfoques de sistemas que se utilicen deberían estar elaborados por las ONPF. En el presente anexo se señalan las responsabilidades de las ONPF y, si procede, los requisitos básicos de cada una de las entidades participantes en el enfoque de sistemas.</del>	P	Category : TECHNICAL  OIRSA <b>(19) Uruguay (9 Aug 2024 6:00 AM)</b> Se elimina párrafo para evitar duplicacion con párrafo 33
49	De conformidad con la NIMF 12, <i>Certificados fitosanitarios</i> , la certificación fitosanitaria se utiliza para avalar que los envíos cumplen los requisitos fitosanitarios de importación y la realiza una <del>ONPF</del> <u>ONPF del país exportador</u> . La finalidad de los enfoques de sistemas para las semillas es ofrecer otras opciones de <u>manejo de riesgo de plagas que proporcionan las bases para la</u> certificación fitosanitaria <del>que cumplan al cumplir con</del> los requisitos fitosanitarios de importación de todas las ONPF que intervienen en el movimiento internacional de semillas a lo largo de la cadena de suministro. Todo enfoque de sistemas para las semillas podrá requerir que las ONPF colaboren con las entidades que participan en dicho enfoque de sistemas, con vistas a asegurar la <u>buena salud fitosanidad</u> de las semillas que se producen y se mueven a lo largo de la cadena de suministro de los países que reconocen dicho enfoque. En la NIMF 14 se exponen los elementos de los enfoques de sistemas, algunos de los cuales pueden ser pertinentes para un enfoque de sistemas para las semillas.	P	Category : TECHNICAL <b>(207) OIRSA (19 Aug 2024 3:04 AM)</b>
49	De conformidad con la NIMF 12, <i>Certificados fitosanitarios</i> , la certificación fitosanitaria se utiliza para avalar que los envíos cumplen los requisitos fitosanitarios de importación y la realiza una <del>ONPF</del> <u>ONPF del país exportador</u> . La finalidad de los enfoques de sistemas para las semillas es ofrecer otras opciones <u>manejo del riesgo de plagas que proporcionan las bases para la</u> certificación fitosanitaria <del>que cumplan al cumplir con</del> los requisitos fitosanitarios de importación de todas las ONPF que intervienen en el movimiento internacional de semillas a lo largo de la cadena de suministro. Todo enfoque de sistemas para las semillas podrá requerir que las ONPF colaboren con las entidades que participan en dicho enfoque de sistemas, con vistas a asegurar la <u>buena salud fitosanidad</u> de las semillas que se	P	Category : EDITORIAL <b>(128) Nicaragua (18 Aug 2024 5:02 PM)</b> redacción


	producen y se mueven a lo largo de la cadena de suministro de los países que reconocen dicho enfoque. En la NIMF 14 se exponen los elementos de los enfoques de sistemas, algunos de los cuales pueden ser pertinentes para un enfoque de sistemas para las semillas.		
49	<u>La finalidad de un enfoque de sistemas para las semillas es ofrecer otra opción de manejo de riesgo de plagas para cumplir los requisitos fitosanitarios de importación de todas las ONPF que intervienen en el movimiento internacional de semillas a lo largo de la cadena de suministro. Todo enfoque de sistemas para las semillas debería requerir que las ONPF colaboren con las entidades que participan en dicho enfoque de sistemas, manejar el riesgo de plagas de las semillas que se producen y se mueven a lo largo de la cadena de suministro de los países que reconocen dicho enfoque. En la NIMF 14 se exponen los elementos de los enfoques de sistemas, algunos de los cuales pueden ser pertinentes para un enfoque de sistemas para las semillas. De conformidad con la NIMF 12, <i>Certificados fitosanitarios</i>, la certificación fitosanitaria se utiliza para avalar que los envíos cumplen los requisitos fitosanitarios de importación y la realiza una ONPF. La finalidad de los enfoques de sistemas para las semillas es ofrecer otras opciones de certificación fitosanitaria que cumplan los requisitos fitosanitarios de importación de todas las ONPF que intervienen en el movimiento internacional de semillas a lo largo de la cadena de suministro. Todo enfoque de sistemas para las semillas podrá requerir que las ONPF colaboren con las entidades que participan en dicho enfoque de sistemas, con vistas a asegurar la buena salud de las semillas que se producen y se mueven a lo largo de la cadena de suministro de los países que reconocen dicho enfoque. En la NIMF 14 se exponen los elementos de los enfoques de sistemas, algunos de los cuales pueden ser pertinentes para un enfoque de sistemas para las semillas.</u>	P	<p>Category : <i>TECHNICAL</i></p> <p> OIRSA</p> <p><b>(88) Uruguay (14 Aug 2024 6:48 PM)</b></p> <p>1) Texto innecesario, 2) Por consistencia 3) El propósito de un enfoque de sistemas es cumplir con los requisitos fitosanitarios de importación y no asegurar la sanidad de las semillas, es una opción de manejo de riesgo de plagas</p>
49	De conformidad con la NIMF 12, <i>Certificados fitosanitarios</i> , la certificación fitosanitaria se utiliza para avalar que los envíos cumplen los requisitos fitosanitarios de importación y la realiza una ONPF. La finalidad de los enfoques de sistemas para las semillas es ofrecer otras opciones de certificación fitosanitaria que cumplan los requisitos fitosanitarios de importación de todas las ONPF que intervienen en el movimiento internacional de semillas a lo largo de la cadena de suministro. Todo enfoque de sistemas para las semillas podrá requerir que las ONPF colaboren con las entidades que participan en dicho enfoque de sistemas, con vistas a asegurar la buena <del>salud</del> <u>fitosanidad</u> de las semillas que se producen y	P	<p>Category : <i>TRANSLATION</i></p> <p><b>(47) CA (13 Aug 2024 8:17 PM)</b></p> <p>La traducción de health, debería ser sanidad, pero para mayor precisión debería considerarse "fitosanidad de las semillas"</p>

	se mueven a lo largo de la cadena de suministro de los países que reconocen dicho enfoque. En la NIMF 14 se exponen los elementos de los enfoques de sistemas, algunos de los cuales pueden ser pertinentes para un enfoque de sistemas para las semillas.		
49	<u>La finalidad de un enfoque de sistemas para las semillas es ofrecer otra opción para el manejo de riesgo de plagas para cumplir los requisitos fitosanitarios de importación de todas las ONPF que intervienen en el movimiento internacional de semillas a lo largo de la cadena de suministro. Todo enfoque de sistemas para las semillas debería requerir que las ONPF colaboren con las entidades que participan en dicho enfoque de sistemas, con vistas a asegurar el manejo de riesgo de las semillas que se producen y se mueven a lo largo de la cadena de suministro de los países que reconocen dicho enfoque. En la NIMF 14 se exponen los elementos de los enfoques de sistemas, algunos de los cuales pueden ser pertinentes para un enfoque de sistemas para las semillas.</u> <del>De conformidad con la NIMF 12, <i>Certificados fitosanitarios</i>, la certificación fitosanitaria se utiliza para avalar que los envíos cumplen los requisitos fitosanitarios de importación y la realiza una ONPF. La finalidad de los enfoques de sistemas para las semillas es ofrecer otras opciones de certificación fitosanitaria que cumplan los requisitos fitosanitarios de importación de todas las ONPF que intervienen en el movimiento internacional de semillas a lo largo de la cadena de suministro. Todo enfoque de sistemas para las semillas podrá requerir que las ONPF colaboren con las entidades que participan en dicho enfoque de sistemas, con vistas a asegurar la buena salud de las semillas que se producen y se mueven a lo largo de la cadena de suministro de los países que reconocen dicho enfoque. En la NIMF 14 se exponen los elementos de los enfoques de sistemas, algunos de los cuales pueden ser pertinentes para un enfoque de sistemas para las semillas.</del>	P	<i>Category : TECHNICAL</i> <b>(20) Uruguay (9 Aug 2024 6:11 AM)</b> Primera frase eliminada por ser innecesaria. El propósito de un enfoque de sistemas es cumplir los requisitos fitosanitarios no asegurar la sanidad de la semillas, ya que es una opción para el manejo de riesgo de plagas
51	Algunos de los aspectos característicos de la producción y el <del>comercio</del> <u>movimiento internacional</u> de semillas, <del>en comparación con la producción y el comercio de otras plantas y productos vegetales,</del> es que los períodos en que las semillas se pueden almacenar y entregar pueden ser largos y que la entrega se puede realizar a muchos clientes distintos de países diferentes, con múltiples reexportaciones. Es posible que un enfoque de sistemas para las semillas, en especial si incluye <del>medidas y</del> prácticas utilizadas en la cadena de suministro de semillas, deba considerar si se necesitan requisitos especiales para:	P	<i>Category : TECHNICAL</i>  <b>ORISA</b> <b>(89) Uruguay (14 Aug 2024 6:52 PM)</b> 1) Por consistencia y simplificación de texto, 2) Ver comentario general de Uruguay


52	las semillas producidas antes de que una entidad haya recibido la autorización para participar en el enfoque de sistemas (estas semillas no deberían <del>comercializarse</del> <u>movilizarse</u> en el marco del enfoque de sistemas);	P	Category : TECHNICAL  OIRSA <b>(90) Uruguay (14 Aug 2024 6:53 PM)</b> Por consistencia
52	las semillas producidas antes de que una entidad haya recibido la autorización para participar en el enfoque de sistemas (estas semillas no deberían comercializarse <u>de un país a otro</u> en el marco del enfoque de sistemas);	P	Category : SUBSTANTIVE  OIRSA <b>(48) CA (13 Aug 2024 8:19 PM)</b> Para mayor precisión, dado que el comercio no solo implica movimiento internacional.
53	las semillas producidas antes de que la ONPF del país importador haya aprobado el enfoque de sistemas (estas semillas deberían examinarse para determinar en qué medida cumplen los requisitos fitosanitarios de <del>importación del país importador</del> <u>importación</u> );	P	Category : TECHNICAL <b>(266) OIRSA (21 Aug 2024 9:46 PM)</b> Claridad del párrafo
53	las semillas producidas antes de que la ONPF del país importador haya aprobado el enfoque de sistemas (estas semillas deberían examinarse para determinar en qué medida cumplen los requisitos fitosanitarios <del>de importación del país importador</del> <u>importador</u> , de ser el caso informar a la ONPF);	P	Category : SUBSTANTIVE <b>(49) CA (13 Aug 2024 8:23 PM)</b>
54	<del>el transporte de semillas a granel;</del>	P	Category : TECHNICAL  OIRSA <b>(208) OIRSA (19 Aug 2024 3:05 AM)</b>
54	<del>el transporte de semillas a granel;</del>	P	Category : EDITORIAL <b>(130) Nicaragua (18 Aug 2024 5:10 PM)</b> se anula parrafo
56	<del>la mezcla o combinación de semillas de diferentes orígenes o lugares de producción.-</del> <u>rastreabilidad en las múltiples exportaciones y reexportaciones</u>	P	Category : TECHNICAL <b>(209) OIRSA (19 Aug 2024 3:05 AM)</b>
56	<del>la mezcla o combinación de semillas de diferentes orígenes o lugares de producción.-</del> <u>rastreabilidad en las múltiples exportaciones y reexportaciones</u>	P	Category : EDITORIAL <b>(129) Nicaragua (18 Aug 2024 5:09 PM)</b> se anula parrafo
57	Las prácticas de producción utilizadas por las entidades participantes se podrán incluir como medidas <u>de mitigación del riesgo</u> en los enfoques de sistemas si las ONPF participantes reconocen que dichas prácticas son eficaces para manejar el riesgo de plagas. Se debería considerar que dichas medidas, en combinación con los sistemas de garantía de la calidad de las entidades participantes (como auditorías y otros requisitos mencionados en el presente anexo), cumplen los requisitos fitosanitarios de importación de los países importadores.	P	Category : TECHNICAL <b>(210) OIRSA (19 Aug 2024 3:06 AM)</b>
57	Las prácticas de producción utilizadas por las entidades participantes se podrán	P	Category : EDITORIAL



	incluir como medidas <u>de mitigación del riesgo</u> en los enfoques de sistemas si las ONPF participantes reconocen que dichas prácticas son eficaces para manejar el riesgo de plagas. Se debería considerar que dichas medidas, en combinación con los sistemas de garantía de la calidad de las entidades participantes (como auditorías y otros requisitos mencionados en el presente anexo), cumplen los requisitos fitosanitarios de importación de los países importadores.		<b>(131) Nicaragua (18 Aug 2024 5:11 PM)</b> se agrega mitigación del riesgo
57	Las prácticas de producción <u>y los sistemas de calidad</u> utilizadas por las entidades participantes se podrán incluir como medidas en los enfoques de sistemas si las ONPF participantes reconocen que dichas prácticas son eficaces para manejar el riesgo de plagas. <del>Se debería considerar que dichas medidas, en combinación con plagas para cumplir los sistemas de garantía de la calidad de las entidades participantes (como auditorías y otros requisitos mencionados en el presente anexo), cumplen los requisitos</del> fitosanitarios de importación de los países importadores.	P	<i>Category : TECHNICAL</i>  OIRSA <b>(91) Uruguay (14 Aug 2024 7:00 PM)</b> 1) Por consistencia con el párrafo 33, 2) texto eliminado redundante
58	Se podrán utilizar enfoques de sistemas para las semillas con vistas a manejar grupos de plagas en lugar de plagas individuales (sobre la base del concepto definido en la NIMF 36). <u>Siempre y cuando se cumplan con las regulaciones más estrictas para la plaga de mayor riesgo.</u> Si se elaboran enfoques de sistemas para grupos de plagas, las ONPF deberían permitir que <u>se indiquen</u> en las declaraciones adicionales (véase la NIMF 12 para obtener orientación al respecto) se <del>utilizaran</del> <u>utilicen</u> términos más genéricos en lugar <u>de</u> enumerar solamente especies individuales, <u>si las ONPF están de acuerdo.</u>	P	<i>Category : TECHNICAL</i> <b>(211) OIRSA (19 Aug 2024 3:08 AM)</b>
58	Se podrán utilizar enfoques de sistemas para las semillas con vistas a manejar grupos de plagas en lugar de plagas individuales (sobre la base del concepto definido en la NIMF 36). <del>Si</del> <u>Siempre y cuando se cumpla con las regulaciones más estrictas para la plaga de mayor riesgo</u> <del>Si se</del> elaboran enfoques de sistemas para grupos de plagas, las ONPF deberían permitir <del>que se indique</del> en las declaraciones adicionales (véase la NIMF 12 para obtener orientación al respecto) se <del>utilizaran</del> <u>utilicen</u> términos más genéricos en lugar <u>de</u> enumerar solamente especies <del>individuales</del> <u>individuales si las ONPF están de acuerdo.</u>	P	<i>Category : EDITORIAL</i> <b>(132) Nicaragua (18 Aug 2024 5:20 PM)</b> cambios de redacción
58	<del>Se podrán utilizar enfoques de sistemas para las semillas con vistas a manejar grupos de plagas en lugar de plagas individuales (sobre la base del concepto definido en la NIMF 36). Si se elaboran enfoques de sistemas para grupos de plagas, las ONPF deberían permitir que en las declaraciones adicionales (véase la</del>	P	<i>Category : TECHNICAL</i> <b>(92) Uruguay (14 Aug 2024 7:01 PM)</b> Se sugiere mover el párrafo al párrafo 96





	<del>NIMF 12 para obtener orientación al respecto) se utilizarán términos más genéricos en lugar de enumerar solamente especies individuales.</del>		
59	Para comprobar que las plagas reglamentadas se han eliminado <u>o se cumplen los niveles de tolerancia en la cadena de suministro de semillas</u> , las ONPF siempre deberían considerar la posibilidad de incluir <u>el análisis de pruebas a</u> las semillas como medida independiente en el enfoque de sistemas o como procedimiento de verificación.	P	Category : TECHNICAL (212) OIRSA (19 Aug 2024 3:11 AM)
59	Para comprobar que las plagas reglamentadas se han eliminado <u>o se cumplen los niveles de la cadena de suministro de tolerancia en las</u> semillas, las ONPF siempre deberían considerar la posibilidad de incluir <u>el análisis de pruebas a</u> las semillas como medida independiente en el enfoque de sistemas o como procedimiento de verificación.	P	Category : EDITORIAL (133) Nicaragua (18 Aug 2024 5:24 PM) cambio de la palabra de analisis por prueba
59	Para <del>comprobar</del> <u>verificar</u> que <u>el riesgo de</u> las plagas reglamentadas se han <del>eliminado</del> <u>manejado a lo largo</u> de la cadena de suministro de semillas, las ONPF <del>siempre</del> deberían considerar la posibilidad de incluir <u>el análisis la prueba</u> de las semillas como <del>medida independiente en el enfoque de sistemas o como</del> procedimiento de verificación.	P	Category : SUBSTANTIVE  OIRSA (93) Uruguay (14 Aug 2024 7:09 PM) 1) La redacción no es correcta, las plagas no son eliminadas, las medidas se acuerdan para minimizar su riesgo, 2) Una de las principales razones para un enfoque de sistemas para semillas es evitar el análisis de semillas a menos que se utilice como un procedimiento de verificación
60	El hecho de que las ONPF reconozcan <del>la equivalencia de las medidas, que podrán incluir</del> métodos <u>equivalentes</u> de <u>análisis pruebas</u> y protocolos de diagnóstico de plagas, puede hacer que la aplicación de los enfoques de sistemas sea más eficiente.	P	Category : TECHNICAL (267) OIRSA (21 Aug 2024 10:54 PM) Claridad del párrafo
60	El hecho de que las ONPF reconozcan la equivalencia de las medidas, que podrán incluir <del>métodos de análisis pruebas</del> y protocolos de diagnóstico de plagas, puede hacer que la aplicación de los enfoques de sistemas sea más eficiente.	P	Category : EDITORIAL (213) OIRSA (19 Aug 2024 3:12 AM)
60	El hecho de que las ONPF reconozcan la equivalencia de las medidas, que podrán incluir métodos de <u>análisis prueba</u> y protocolos de diagnóstico de plagas, puede hacer que la aplicación de los enfoques de sistemas sea más eficiente.	P	Category : EDITORIAL (134) Nicaragua (18 Aug 2024 5:25 PM) sustituir análisis por prueba
60	El hecho de que las ONPF reconozcan <del>la equivalencia de las medidas, que podrán incluir</del> métodos de <u>análisis prueba</u> y protocolos de diagnóstico de plagas, <u>equivalentes</u> puede hacer que la aplicación de los enfoques de sistemas sea más eficiente.	P	Category : SUBSTANTIVE (94) Uruguay (14 Aug 2024 7:16 PM) Se habla de equivalencia de medidas en la situación en la cual para un riesgo determinado de plagas, diferentes medidas fitosanitarias logran el nivel apropiado de protección de una parte contratante de acuerdo con la NIMF. Los enfoques de sistemas podrán ser equivalentes a medidas individuales y menos restrictivos. El párrafo es confuso, ya que el reconocimiento de equivalencia de medidas refiere a la armonización de métodos de prueba y protocolos de diagnóstico entre las ONPF

62	En la NIMF 14 se presenta orientación general sobre los conceptos y la elaboración de enfoques de sistemas por las ONPF. Los enfoques de sistemas deberían estar diseñados para poder asegurar la <del>buena salud</del> <u>fitosanidad</u> de las semillas a lo largo de toda la cadena de suministro, integrando medidas encaminadas a reducir el riesgo de plagas de manera definida, clara y simple.	P	Category : EDITORIAL <b>(214) OIRSA (19 Aug 2024 3:13 AM)</b>
62	En la NIMF 14 se presenta orientación general sobre los conceptos y la elaboración de enfoques de sistemas por las ONPF. Los enfoques de sistemas deberían estar diseñados para poder asegurar la <del>buena salud</del> <u>fitosanidad</u> de las semillas a lo largo de toda la cadena de suministro, integrando medidas encaminadas a reducir el riesgo de plagas de manera definida, clara y simple.	P	Category : EDITORIAL <b>(135) Nicaragua (18 Aug 2024 5:26 PM)</b> cambio de buena salud por fitosanidad
62	En la NIMF 14 se presenta orientación general sobre los conceptos y la elaboración de enfoques de sistemas por las ONPF. Los enfoques de sistemas deberían estar diseñados <u>en colaboración con las entidades participantes</u> , para <del>poder asegurar la buena salud</del> <u>manejar el riesgo</u> de <u>plagas de</u> las semillas a lo largo de toda la cadena de suministro, integrando medidas <del>encaminadas a reducir el riesgo de plagas de</del> manera definida, clara y simple.	P	Category : SUBSTANTIVE  OIRSA <b>(95) Uruguay (14 Aug 2024 7:22 PM)</b> Por consistencia con el párrafo 49. Los enfoques de sistemas se diseñan como opción de manejo de riesgo de plagas para reducir o manejar el riesgo de plagas asociado a las semillas
62	En la NIMF 14 se presenta orientación general sobre los conceptos y la elaboración de enfoques de sistemas por las ONPF. Los enfoques de sistemas deberían estar diseñados para poder asegurar la <del>buena salud</del> <u>condición fitosanitaria</u> de las semillas a lo largo de toda la cadena de suministro, integrando medidas encaminadas a reducir el riesgo de plagas de manera definida, clara y simple.	P	Category : EDITORIAL <b>(54) CA (13 Aug 2024 9:16 PM)</b> Para una mejor comprensión del párrafo
62	En la NIMF 14 se presenta orientación general sobre los conceptos y la elaboración de enfoques de sistemas por las ONPF. Los enfoques de sistemas deberían estar diseñados para poder asegurar la <del>buena salud</del> <u>fitosanidad</u> de las semillas a lo largo de toda la cadena de suministro, integrando medidas encaminadas a reducir el riesgo de plagas de manera definida, clara y simple.	P	Category : TRANSLATION <b>(50) CA (13 Aug 2024 8:24 PM)</b> Traducción, cambiar "fitosanidad de las semillas"
63	<del>2.1 Determinación del producto</del> <u>Identificación de las especies, variedades y cultivares</u>	P	Category : TECHNICAL <b>(215) OIRSA (19 Aug 2024 3:13 AM)</b> términos correctos
63	<del>2.1 Determinación del producto</del> <u>Identificación de especies y variedades o cultivares</u>	P	Category : EDITORIAL <b>(138) Nicaragua (18 Aug 2024 5:32 PM)</b> cambio de sub título
63	<del>2.1 Determinación del producto</del> <u>Identificación de las especies y variedades</u>	P	Category : EDITORIAL <b>(136) Nicaragua (18 Aug 2024 5:30 PM)</b> Redacción del título
63	<del>2.1 Determinación del producto</del> <u>Identificación de la especie de</u>	P	Category : TECHNICAL <b>(96) Uruguay (14 Aug 2024 7:33 PM)</b>



	<u>semillas</u>		Si bien en la NIMF 5 "producto" incluye el movimiento con otros propósitos diferentes al comercio, en la industria semillera "producto" está asociado a "comercio". Por lo tanto sugerimos usar especie de semilla
63	<b>2.1 <u>Determinación-Identificación</u> del producto</b>	P	Category : TRANSLATION (31) Colombia (10 Aug 2024 12:01 AM) Se considera adecuado utilizar la palabra identificación en lugar de la palabra determinación
64	<del>Las entidades podrán determinar un producto de semillas que sea de interés para el comercio internacional y proponer a las ONPF interesadas de los países productores de semillas que elaboren un enfoque de sistemas para dicho producto. El enfoque de sistemas se podrá elaborar en colaboración con las entidades participantes en la medida en que puedan contribuir a la reducción del riesgo de plagas a través del enfoque de sistemas.</del>	P	Category : EDITORIAL (137) Nicaragua (18 Aug 2024 5:31 PM) se solicita una nueva redacción del párrafo
64	Las entidades podrán determinar <del>un producto</del> <u>una especie</u> de semillas <del>que sea de interés para el comercio internacional</del> y proponer a las ONPF interesadas de los países productores de semillas que elaboren un enfoque de sistemas para <del>dicho producto. El enfoque dicha especie de sistemas se podrá elaborar en colaboración con las entidades participantes en la medida en que puedan contribuir a la reducción del riesgo de plagas a través del enfoque de sistemas.</del> <u>semilla.</u>	P	Category : TECHNICAL (97) Uruguay (14 Aug 2024 7:39 PM) 1) sugerimos usar especie de semilla en lugar de producto, 2) se sugiere simplificar texto para evitar duplicaciones y texto redundante
64	Las entidades podrán <del>determinar un producto de identificar las</del> semillas que sea de interés para el comercio internacional y proponer a las ONPF interesadas de los países productores de semillas que elaboren un enfoque de sistemas para dicho producto. El enfoque de sistemas se podrá elaborar en colaboración con las entidades participantes en la medida en que puedan contribuir a la reducción del riesgo de plagas a través del enfoque de sistemas.	P	Category : EDITORIAL (55) CA (13 Aug 2024 9:18 PM) En concordancia con el subtítulo
64	Las entidades podrán determinar <del>un producto de</del> semillas que <del>sea sean</del> de interés para el comercio internacional y proponer a las ONPF interesadas de los países productores de semillas que elaboren un enfoque de sistemas para dicho producto. El enfoque de sistemas se podrá elaborar en colaboración con las entidades participantes en la medida en que puedan contribuir a la reducción del riesgo de plagas a través del enfoque de sistemas.	P	Category : EDITORIAL (32) Colombia (10 Aug 2024 12:03 AM) Se considera adecuado utilizar la palabra semilla en lugar del término "producto de semillas"
65	<b>2.2 Determinación de plagas individuales o grupos de plagas asociados <del>al producto de semillas</del> <u>a la semilla</u></b>	P	Category : EDITORIAL (216) OIRSA (19 Aug 2024 3:14 AM)
65	<b>2.2 Determinación de plagas individuales o grupos de plagas asociados <del>al producto de semillas</del> <u>a la semilla</u></b>	P	Category : EDITORIAL (139) Nicaragua (18 Aug 2024 5:33 PM) cambio de producto por semilla

65	<b>2.2 Determinación de plagas individuales o grupos de plagas asociados <del>al producto</del> a la especie de semillas</b>	P	Category : TECHNICAL  OIRSA <b>(98) Uruguay (14 Aug 2024 7:41 PM)</b> 1) Ver comentarios de Uruguay en párrafos 63 y 64
65	<b>2.2 Determinación de plagas individuales o grupos de plagas asociados <del>al producto de</del> a semillas</b>	P	Category : EDITORIAL <b>(33) Colombia (10 Aug 2024 12:03 AM)</b> Se considera adecuado utilizar la palabra semilla en lugar del término "producto de semillas"
66	Para cualquier <del>producto-especie</del> de <del>semillas-concreto</del> <del>semillas</del> , se debería llevar a cabo un análisis de riesgo de plagas y determinar las plagas o grupos de plagas que previsiblemente están asociados a las semillas como vía (véanse la NIMF 2, <i>Marco para el análisis de riesgo de plagas</i> , y la NIMF 11, <i>Análisis de riesgo de plagas para plagas cuarentenarias</i> ). Los análisis de riesgo de plagas también sirven de base para establecer los requisitos fitosanitarios de importación, ya que toman en consideración la finalidad de las importaciones de semillas (esto es, el uso previsto) para determinar la rigurosidad de las medidas necesarias. Cuando aparece una nueva plaga y el análisis de riesgo de plagas muestra que está asociada al producto de semillas al que se aplica el enfoque de sistemas, este debería reevaluarse y ajustarse si fuera necesario.	P	Category : EDITORIAL <b>(217) OIRSA (19 Aug 2024 3:15 AM)</b>
66	Para cualquier <del>producto-especie</del> de semillas concreto, se debería llevar a cabo un análisis de riesgo de plagas y determinar las plagas o grupos de plagas que previsiblemente están asociados a las semillas como vía (véanse la NIMF 2, <i>Marco para el análisis de riesgo de plagas</i> , y la NIMF 11, <i>Análisis de riesgo de plagas para plagas cuarentenarias</i> ). Los análisis de riesgo de plagas también sirven de base para establecer los requisitos fitosanitarios de importación, ya que toman en consideración la finalidad de las importaciones de semillas (esto es, el uso previsto) para determinar la rigurosidad de las medidas necesarias. Cuando aparece una nueva plaga y el análisis de riesgo de plagas muestra que está asociada al producto de semillas al que se aplica el enfoque de sistemas, este debería reevaluarse y ajustarse si fuera necesario.	P	Category : EDITORIAL <b>(140) Nicaragua (18 Aug 2024 5:34 PM)</b> cambio de producto por el termino especie
66	Para cualquier <del>producto-especie</del> de semillas concreto, se debería llevar a cabo un análisis de riesgo de plagas y determinar las plagas <del>o grupos de plagas</del> que previsiblemente están asociados a las semillas como vía (véanse la <del>NIMF 2</del> , <u>sección 1 de esta norma</u> <del>Marco para el análisis de riesgo de plagas</del> ,). Cuando <u>aparece una nueva plaga y el análisis de riesgo de plagas muestra que está asociada a la NIMF 11</u> <del>especie de semillas</del> , <u>el enfoque de sistemas, debería reevaluarse y</u>	P	Category : TECHNICAL <b>(99) Uruguay (14 Aug 2024 7:49 PM)</b> 1) La sección 1 de la NIMF 38 especifica el ARP para semillas y allí se hace la referencia a las normas de ARP relevantes, 2) Texto eliminado por que no tiene relacion con el contenido de la sección


	<del>ajustarse si fuera necesario. Análisis de riesgo de plagas para plagas cuarentenarias). Los análisis de riesgo de plagas también sirven de base para establecer los requisitos fitosanitarios de importación, ya que toman en consideración la finalidad de las importaciones de semillas (esto es, el uso previsto) para determinar la rigurosidad de las medidas necesarias. Cuando aparece una nueva plaga y el análisis de riesgo de plagas muestra que está asociada al producto de semillas al que se aplica el enfoque de sistemas, este debería reevaluarse y ajustarse si fuera necesario.</del>		
66	Para cualquier <del>producto tipo</del> de semillas concreto, se debería llevar a cabo un análisis de riesgo de plagas y determinar las plagas o grupos de plagas que previsiblemente están asociados a las semillas como vía (véanse la NIMF 2, <i>Marco para el análisis de riesgo de plagas</i> , y la NIMF 11, <i>Análisis de riesgo de plagas para plagas cuarentenarias</i> ). Los análisis de riesgo de plagas también sirven de base para establecer los requisitos fitosanitarios de importación, ya que toman en consideración la finalidad de las importaciones de semillas (esto es, el uso previsto) para determinar la rigurosidad de las medidas necesarias. Cuando aparece una nueva plaga y el análisis de riesgo de plagas muestra que está asociada <del>al producto de a las</del> semillas <del>al a las</del> que se aplica el enfoque de sistemas, este debería reevaluarse y ajustarse si fuera necesario.	P	Category : EDITORIAL <b>(34) Colombia (10 Aug 2024 12:04 AM)</b> Se considera adecuado utilizar la palabra semilla en lugar del término "producto de semillas"
67	<b>2.3 <del>Medidas Prácticas de producción y acciones reglamentarias en los puntos críticos de control</del></b>	P	Category : TECHNICAL <b>(100) Uruguay (14 Aug 2024 7:52 PM)</b> Por consistencia con el contenido de la sección.
68	En esta sección se ofrecen ejemplos de las opciones de manejo del riesgo de plagas disponibles para las ONPF y las entidades participantes para sopesar la posibilidad de incluirlas como medidas integradas en un enfoque de sistemas. Puede encontrarse más información al respecto en <del>la sección 1.5 del presente anexo y el</del> Apéndice 2 del texto principal de esta norma.	P	Category : TECHNICAL  OIRSA <b>(218) OIRSA (19 Aug 2024 3:16 AM)</b> No se encuentra esta sección
68	En esta sección se ofrecen ejemplos de las opciones de manejo del riesgo de plagas disponibles para las ONPF y las entidades participantes para sopesar la posibilidad de incluirlas como medidas integradas en un enfoque de sistemas. Puede encontrarse más información al respecto en <del>la sección 1.5 del presente anexo y el</del> Apéndice 2 del texto principal de esta norma.	P	Category : EDITORIAL <b>(141) Nicaragua (18 Aug 2024 5:35 PM)</b> eliminar información no presente
68	En esta sección se ofrecen ejemplos de <del>las opciones prácticas de manejo del riesgo de plagas producción</del> disponibles para las ONPF y las entidades participantes para sopesar la posibilidad de incluirlas como medidas integradas en un enfoque de	P	Category : TECHNICAL  OIRSA <b>(101) Uruguay (14 Aug 2024 8:16 PM)</b> 1) Para alinear con el contenido de la sección, 2) no hay sección 1.5 en este Anexo,





	sistemas. <del>Puede encontrarse más información al respecto en la sección 1.5 del presente anexo y el Apéndice 2 del texto principal de esta norma.</del>		por otra parte el Apéndice 2 de la NIMF 38 refiere a las directrices sobre la probabilidad de que los grupos de plagas sean transportados e introducidos por las semillas
69	Las ONPF deberían evaluar la eficacia de las prácticas de producción para reducir el riesgo de plagas antes de incluirlas como medidas en un enfoque de <u>sistemas y evaluarlas para cada plaga que forma parte del enfoque de</u> sistemas. Las ONPF son las encargadas de determinar los puntos críticos de control a los que se podrán aplicar estas medidas. El número de puntos críticos de control podrá variar en función <del>del producto</del> de <u>la especie de</u> semillas de que se trate.	P	Category : TECHNICAL  OIRSA <b>(102) Uruguay (14 Aug 2024 8:20 PM)</b> Se agrega información relevante
69	Las ONPF deberían evaluar la eficacia de las prácticas de producción para reducir el riesgo de plagas antes de incluirlas como medidas en un enfoque de sistemas. Las ONPF son las encargadas de determinar los puntos críticos de control a los que se podrán aplicar estas medidas. El número de puntos críticos de control podrá variar en función <del>del producto</del> de <u>las</u> semillas <del>de que se trate</del> <u>tratar</u> .	P	Category : EDITORIAL <b>(35) Colombia (10 Aug 2024 12:08 AM)</b> Se considera adecuado utilizar la palabra semilla en lugar del término "producto de semillas"
70	He aquí algunos ejemplos de puntos críticos de control y las <del>medidas acciones</del> reglamentarias y prácticas de producción asociadas que pueden reducir el riesgo de plagas:	P	Category : TRANSLATION <b>(103) Uruguay (14 Aug 2024 8:22 PM)</b> "actions" debe traducirse como "acciones", a lo largo de todo el borrador
72	<del>medidas acciones</del> reglamentarias: vigilancia para determinar la condición de una plaga, <del>establecimiento de un área libre de plagas</del> , registro de los <del>productores</del> <u>productores y los sitios de producción</u> , examen y aprobación de un manual del sistema;	P	Category : SUBSTANTIVE  OIRSA <b>(104) Uruguay (14 Aug 2024 8:27 PM)</b> El establecimiento de un ALP no debería ser una acción reglamentaria. Si se establece un ALP para una plaga incluida en el Enfoque de sistemas, esa área debería ser reconocida de acuerdo con la NIMF 4. La acción en este caso es determinar la condición de la plaga en el área, 2) el registro del sitio de producción también es una acción relevante <b>OIRSA (21 Aug 2024 11:18 PM)</b> De acuerdo: no cambiar Medidas por Acciones (NO)
72	<del>medidas reglamentarias</del> : vigilancia para determinar la condición de una plaga, establecimiento de un área libre de plagas, registro de los productores, <u>registro de las áreas de producción</u> , examen y aprobación de un manual del sistema;	P	Category : TECHNICAL  OIRSA <b>(219) OIRSA (19 Aug 2024 3:17 AM)</b>
72	<del>medidas reglamentarias</del> : vigilancia para determinar la condición de una plaga, establecimiento de un área libre de plagas, registro de los productores, <u>registro de las áreas de producción</u> , examen y aprobación de un manual del sistema;	P	Category : EDITORIAL <b>(143) Nicaragua (18 Aug 2024 5:43 PM)</b> registro de areas
73	<del>prácticas de producción</del> : utilización <del>del área libre de plagas, lugares de producción o sitios de producción libres de plagas, utilización de</del> zonas tampón alrededor de los sitios de cultivo, utilización de la exclusión de plagas (por ejemplo, invernaderos o cubiertas), utilización de la rotación de cultivos, eliminación del	P	Category : TECHNICAL  OIRSA <b>(268) OIRSA (21 Aug 2024 11:27 PM)</b> Claridad del párrafo





	hospedante potencial, utilización de fuentes de agua analizadas <del>o limpias</del> libres de plagas, mantenimiento de la documentación, elaboración de un manual del sistema;		
73	<i>prácticas de producción:</i> <del>utilización del área libre de plagas,</del> lugares de producción o sitios de producción libres de plagas, <u>áreas de baja prevalencia</u> , utilización de zonas tampón alrededor de los sitios de cultivo, utilización de la exclusión de plagas (por ejemplo, invernaderos o cubiertas), utilización de la rotación de cultivos, eliminación del hospedante potencial, utilización de fuentes de agua analizadas <del>o limpias</del> libres de plagas, mantenimiento de la documentación, elaboración de un manual del sistema;	P	Category : TECHNICAL <b>(221) OIRSA (19 Aug 2024 3:19 AM)</b>
73	<i>prácticas de producción:</i> <del>utilización del área libre de plagas,</del> lugares de producción o sitios de producción libres de plagas, <u>áreas de baja prevalencia</u> , utilización de zonas tampón alrededor de los sitios de cultivo, utilización de la exclusión de plagas (por ejemplo, invernaderos o cubiertas), utilización de la rotación de cultivos, eliminación del hospedante potencial, utilización de fuentes de agua analizadas <del>o limpias</del> libres de plagas, mantenimiento de la documentación, elaboración de un manual del sistema;	P	Category : TECHNICAL <b>(220) OIRSA (19 Aug 2024 3:18 AM)</b>
73	<i>prácticas de producción:</i> <del>utilización del área libre de plagas,</del> lugares de producción o sitios de producción libres de plagas, <u>áreas de baja prevalencia</u> , utilización de zonas tampón alrededor de los sitios de cultivo, utilización de la exclusión de plagas (por ejemplo, invernaderos o cubiertas), utilización de la rotación de cultivos, eliminación del hospedante potencial, <u>reposo, veda</u> utilización de fuentes de agua <del>analizadas o limpias,</del> <u>analizadas libres de plagas</u> mantenimiento de la documentación, elaboración de un manual del sistema;	P	Category : EDITORIAL <b>(142) Nicaragua (18 Aug 2024 5:41 PM)</b> se agrega áreas de baja prevalencia
73	<i>prácticas de producción:</i> <del>utilización-selección del área libre de plagas</del> <u>campo,</u> <del>lugares de producción o sitios de producción libres de plagas,</del> utilización de zonas tampón alrededor de los sitios de cultivo, utilización de la exclusión de plagas (por ejemplo, invernaderos o cubiertas), utilización de la rotación de cultivos, eliminación del hospedante potencial, utilización de fuentes de agua analizadas o limpias, mantenimiento de la documentación, elaboración de un manual del sistema;	P	Category : SUBSTANTIVE <b>(105) Uruguay (14 Aug 2024 8:29 PM)</b> La práctica de producción debería ser la selección de un campo en el cual la plaga esta ausente
75	<del>medidas</del> - <u>acciones</u> reglamentarias: aprobación de instalaciones de análisis y programas de certificación, certificación de instalaciones destinadas al trasplante;	P	Category : TRANSLATION <b>(107) Uruguay (14 Aug 2024 8:34 PM)</b> "actions" debe traducirse como "acciones"
75	<del>medidas</del> - <u>acciones</u> reglamentarias: aprobación de instalaciones de análisis y programas de certificación, certificación de instalaciones destinadas al trasplante;	P	Category : TRANSLATION <b>(106) Uruguay (14 Aug 2024 8:30 PM)</b> "actions" debe traducirse como "acciones"


76	<i>prácticas de producción:</i> utilización de semillas analizadas o certificadas, aplicación de técnicas de saneamiento en las instalaciones destinadas al trasplante, utilización de cultivares resistentes o menos susceptibles, utilización de tratamientos para las semillas, <u>uso de sustratos nuevos o tratamiento a sustratos</u> , mantenimiento de documentación;	P	Category : TECHNICAL  OIRSA <b>(222) OIRSA (19 Aug 2024 3:21 AM)</b> Se amplia a sustratos
76	<i>prácticas de producción:</i> utilización de semillas analizadas o certificadas, aplicación de técnicas de saneamiento en las instalaciones destinadas al trasplante, utilización de cultivares resistentes o menos susceptibles, utilización de tratamientos para las semillas, <u>uso de sustratos nuevos o tratamientos a sustratos</u> , mantenimiento de documentación;	P	Category : EDITORIAL <b>(144) Nicaragua (18 Aug 2024 5:46 PM)</b> se incluye tratamiento a sustrato o sustrato nuevo
76	<i>prácticas de producción:</i> utilización de semillas <del>analizadas o certificadas</del> <u>sanas</u> , aplicación de técnicas de saneamiento en las instalaciones destinadas al trasplante, utilización de cultivares resistentes o menos susceptibles, utilización de tratamientos para las semillas, mantenimiento de documentación;	P	Category : TECHNICAL  OIRSA <b>(109) Uruguay (14 Aug 2024 8:38 PM)</b> Por consistencia con el texto central de la NIMF 38. Además no siempre se realizan análisis de semillas y hablar de semilla certificada puede llevar a confusión con la semilla certificada usada en la producción de semillas.
77	producción – antes de la <del>recolección</del> <u>cosecha</u> ;	P	Category : TRANSLATION <b>(113) Uruguay (14 Aug 2024 8:49 PM)</b> Harvest debe traducirse como cosecha
78	<i>medidas reglamentarias:</i> inspección durante el período vegetativo, auditorías de las instalaciones o <del>examen-revisión</del> de sus registros;	P	Category : EDITORIAL <b>(223) OIRSA (19 Aug 2024 3:21 AM)</b>
78	<i>medidas reglamentarias:</i> inspección durante el período vegetativo, auditorías de las instalaciones o <del>examen-o</del> de sus registros;	P	Category : EDITORIAL <b>(146) Nicaragua (18 Aug 2024 5:55 PM)</b> eliminar palabra examen
78	<del>medidas acciones</del> <i>reglamentarias:</i> inspección <u>de campo</u> durante el período <del>vegetativo</del> <u>de crecimiento</u> , auditorías de las instalaciones o examen de sus registros;	P	Category : TECHNICAL <b>(110) Uruguay (14 Aug 2024 8:43 PM)</b> Se sugiere usar inspección de campo por consistencia y el término del Glosario "período de crecimiento"
79	<i>prácticas de producción:</i> <del>examen de las plantas</del> <u>inspección</u> durante el período vegetativo, tratamientos o manejo de plagas durante el período vegetativo, muestreo o <del>análisis de prueba a</del> las plantas, aplicación de técnicas de saneamiento en el sitio de cultivo, capacitación de los trabajadores, mantenimiento de documentación;	P	Category : EDITORIAL <b>(224) OIRSA (19 Aug 2024 3:22 AM)</b> uso correcto de términos
79	<i>prácticas de producción:</i> <del>examen</del> <u>inspección</u> de las plantas durante el período vegetativo, tratamientos o manejo de plagas durante el período vegetativo, muestreo o <del>análisis-prueba</del> de las plantas, aplicación de técnicas de saneamiento en el sitio de cultivo, capacitación de los trabajadores, mantenimiento de	P	Category : EDITORIAL <b>(145) Nicaragua (18 Aug 2024 5:55 PM)</b> cambiar examen por inspección



	documentación;		
79	<i>prácticas de producción</i> : examen de las plantas durante el período <del>vegetativo</del> <u>de crecimiento</u> , <u>raleo</u> , tratamientos o manejo de plagas durante el período <del>vegetativo</del> <u>de crecimiento</u> , muestreo o <del>análisis-prueba</del> de las plantas, aplicación de técnicas de saneamiento en el sitio de cultivo, capacitación de los trabajadores, mantenimiento de documentación;	P	Category : TECHNICAL 👍 OIRSA (111) Uruguay (14 Aug 2024 8:46 PM) 1) Usar el término "período de crecimiento" definido en el Glosario, 2) raleo se agrega porque es una práctica relevante
80	producción – <del>recolección</del> <u>cosecha</u> de semillas:	P	Category : TRANSLATION (114) Uruguay (14 Aug 2024 8:49 PM) "harvest" debe traducirse como "cosecha"
81	<del>medidas</del> <u>acciones</u> <del>reglamentarias</del> : inspección sobre el terreno en el momento de la recolección, análisis cuando proceda;	P	Category : TRANSLATION (116) Uruguay (14 Aug 2024 8:51 PM) actions" debe traducirse como "acciones"
82	<i>prácticas de producción</i> : desinfección del equipo antes de utilizarlo en diferentes <u>lotes</u> , campos o en diferentes fechas de recolección, evitar la recolección de semillas de plantas <del>enfermas o poco saludables</del> <u>infestadas</u> , utilización de períodos de recolección para evitar la infestación, aplicación de técnicas de saneamiento, mantenimiento de documentación;	P	Category : TECHNICAL 👍 OIRSA (225) OIRSA (19 Aug 2024 3:23 AM) uso correcto de términos
82	<i>prácticas de producción</i> : desinfección del equipo antes de utilizarlo en diferentes <u>lotes</u> , campos o en diferentes fechas de recolección, evitar la recolección de semillas de plantas enfermas o <del>poco saludables</del> <u>infestadas</u> , utilización de períodos de recolección para evitar la infestación, aplicación de técnicas de saneamiento, mantenimiento de documentación;	P	Category : EDITORIAL (147) Nicaragua (18 Aug 2024 5:58 PM) redacción
82	<i>prácticas de producción</i> : desinfección del equipo antes de utilizarlo en diferentes campos o en diferentes fechas de recolección, evitar la recolección de semillas de plantas <del>enfermas o</del> poco saludables, utilización de períodos de recolección para evitar la infestación, aplicación de técnicas de saneamiento, mantenimiento de documentación;	P	Category : TECHNICAL (112) Uruguay (14 Aug 2024 8:47 PM) Redundante
83	después de la recolección – <del>condicionamiento y tratamiento</del> <u>manipulación</u> :	P	Category : TECHNICAL 👍 OIRSA (117) Uruguay (14 Aug 2024 8:56 PM) Término usado en la NIMF 38 para cubrir acondicionamiento y tratamiento
83	después de la <del>recolección</del> <u>cosecha</u> – condicionamiento y tratamiento:	P	Category : TRANSLATION (115) Uruguay (14 Aug 2024 8:50 PM) Harvest debe traducirse como cosecha
84	<i>medidas reglamentarias</i> : auditorías de las instalaciones operacionales, verificación de <del>la eficacia de</del> los <del>tratamientos</del> <u>procesos de manipulación</u> ;	P	Category : TECHNICAL 👍 OIRSA (119) Uruguay (14 Aug 2024 8:58 PM)


			Por consistencia
84	<del>medidas acciones</del> reglamentarias: auditorías de las instalaciones operacionales, verificación de la eficacia de los tratamientos;	P	Category : TRANSLATION <b>(118) Uruguay (14 Aug 2024 8:56 PM)</b> actions" debe traducirse como "acciones"
85	<i>prácticas de producción</i> : fermentación para reducir los residuos de semillas; lavado de las semillas para reducir <del>la carga microbiana contaminante</del> <u>el riesgo de plagas transportadas externamente</u> ; aplicación de tratamientos a las semillas (por ejemplo, calor, agua caliente o plaguicidas) en el momento de la recepción, <del>la molienda selección</del> y <del>la selección</del> <u>limpieza</u> , a fin de reducir los <del>contaminantes en las plantas y las semillas muertas</del> <u>contaminantes</u> ; aplicación de técnicas de saneamiento, y mantenimiento de documentación;	P	Category : TECHNICAL  OIRSA <b>(226) OIRSA (19 Aug 2024 3:25 AM)</b> uso correcto de términos
85	<i>prácticas de producción</i> : fermentación para reducir los residuos de semillas; lavado de las semillas para reducir <del>la carga microbiana contaminante</del> <u>plagas externas</u> ; aplicación de tratamientos a las semillas (por ejemplo, calor, agua caliente o plaguicidas) en el momento de la recepción, <del>la molienda selección</del> y <del>la selección</del> <u>limpieza</u> a fin de reducir los <del>contaminantes en las plantas y las semillas muertas</del> <u>contaminantes</u> ; aplicación de técnicas de saneamiento, y mantenimiento de documentación;	P	Category : EDITORIAL <b>(148) Nicaragua (18 Aug 2024 6:08 PM)</b> dar enfoque fitosanitario
85	<i>prácticas de producción</i> : fermentación para reducir los residuos de semillas; lavado de las semillas para reducir la carga microbiana contaminante; aplicación de tratamientos a las semillas (por ejemplo, calor, agua caliente o plaguicidas) en el momento de la <del>recepción</del> , <del>la molienda</del> <u>recepción</u> y la selección, a fin de reducir los contaminantes en las plantas y las semillas muertas; aplicación de técnicas de saneamiento, y mantenimiento de documentación;	P	Category : TECHNICAL <b>(56) CA (13 Aug 2024 9:25 PM)</b> Al ser semillas, no se considera que deba realizarse una molienda
85	<i>prácticas de producción</i> : fermentación para reducir los residuos de semillas; lavado de las semillas para reducir la carga microbiana contaminante; aplicación de tratamientos a las semillas (por ejemplo, calor, agua caliente o plaguicidas) en el momento de la recepción, la molienda y la selección, a fin de reducir los contaminantes en las plantas y las semillas muertas; aplicación de técnicas de saneamiento, y mantenimiento de documentación;	C	Category : SUBSTANTIVE <b>(5) Ecuador (31 Jul 2024 7:12 PM)</b> En el párrafo se mencionan tratamiento de calor, agua caliente; que no serían bien aplicadas a semillas para plantar , pues pueden disminuir su capacidad de germinación; también menciona procesos de molienda, este proceso no sería utilizado en semillas para plantar; por lo cual se sugiere eliminar estos términos  texto propuesto: prácticas de producción: fermentación para reducir los residuos de semillas; lavado de las semillas para reducir la carga microbiana contaminante; aplicación de tratamientos a las semillas (por ejemplo, fumigación, inmersión, atmósferas controladas) en el momento de la recepción, la selección, el traslado o movilización; a fin de reducir los contaminantes en las plantas y las semillas muertas; aplicación de técnicas de saneamiento, y mantenimiento de documentación;




86	después de la recolección – <del>manipulación y</del> almacenamiento:	P	Category : TECHNICAL  OIRSA <b>(120) Uruguay (14 Aug 2024 9:00 PM)</b> La manipulación fue considerada en el párrafo 83
87	<i>medidas reglamentarias</i> : auditorías e inspecciones de las instalaciones, <u>verificación de la trazabilidad</u> ;	P	Category : TECHNICAL  OIRSA <b>(122) Uruguay (14 Aug 2024 9:02 PM)</b> Se agrega una acción reglamentaria relevante <b>OIRSA (21 Aug 2024 11:39 PM)</b> Si de acuerdo: rastreabilidad
87	<del>medidas acciones</del> <i>reglamentarias</i> : auditorías e inspecciones de las instalaciones;	P	Category : TRANSLATION <b>(121) Uruguay (14 Aug 2024 9:01 PM)</b> actions" debe traducirse como "acciones"
88	<i>prácticas de producción</i> : almacenamiento de las semillas con salvaguardias para prevenir la infestación, almacenamiento de las semillas para mantener <del>su buena salud</del> <u>la fitosanidad</u> e identidad, ejecución de protocolos para prevenir la mezcla de lotes de semillas (limpieza del equipo), sellado del embalaje para excluir plagas, aplicación de técnicas de saneamiento y mantenimiento de documentación;	P	Category : EDITORIAL <b>(227) OIRSA (19 Aug 2024 3:26 AM)</b> uso correcto de términos
88	<i>prácticas de producción</i> : almacenamiento de las semillas con salvaguardias para prevenir la infestación, almacenamiento de las semillas para mantener <del>su buena salud</del> <u>la fitosanidad</u> e identidad, ejecución de protocolos para prevenir la mezcla de lotes de semillas (limpieza del equipo), sellado del embalaje para excluir plagas, aplicación de técnicas de saneamiento y mantenimiento de documentación;	P	Category : EDITORIAL <b>(149) Nicaragua (18 Aug 2024 6:10 PM)</b> cambiar buena salud por fitosanidad
89	después de la recolección – <del>análisis de la calidad de pruebas a</del> las semillas:	P	Category : TECHNICAL  OIRSA <b>(228) OIRSA (19 Aug 2024 3:27 AM)</b> uso correcto del término
89	después de la recolección – <del>análisis de la calidad de Pruebas a</del> las semillas:	P	Category : EDITORIAL <b>(151) Nicaragua (18 Aug 2024 6:14 PM)</b> cambio de redacción
89	después de la recolección – <del>análisis prueba</del> de <del>la calidad de</del> las semillas:	P	Category : TECHNICAL <b>(123) Uruguay (14 Aug 2024 9:05 PM)</b> 1) "prueba" es el termino en español para "test", 2) las acciones reglamentarias no serán para el análisis de la calidad de las semillas
90	<i>medidas reglamentarias</i> : aprobación de las instalaciones de análisis, aprobación o validación de los protocolos de muestreo, <del>pruebas de aptitud</del> ;	P	Category : TECHNICAL  OIRSA <b>(269) OIRSA (21 Aug 2024 11:41 PM)</b> pruebas de aptitud: no se tiene claro éste termino
90	<i>medidas reglamentarias</i> : aprobación de las instalaciones de análisis, aprobación o	P	Category : EDITORIAL <b>(229) OIRSA (19 Aug 2024 3:28 AM)</b>




	validación de los protocolos de muestreo, <del>pruebas de aptitud;</del>		eliminar por no entenderse el objetivo de "aptitud"
90	<i>medidas reglamentarias</i> : aprobación de las instalaciones de análisis, aprobación o validación de los protocolos de muestreo, <del>pruebas de aptitud;</del>	P	<i>Category : EDITORIAL</i> <b>(150) Nicaragua (18 Aug 2024 6:13 PM)</b> Comentario general:excluir calidad de semilla, dar enfoque fitosanitario
90	<del>medidas acciones</del> <i>reglamentarias</i> : aprobación de las instalaciones de análisis, aprobación o validación de los protocolos de muestreo, pruebas de aptitud;	P	<i>Category : TRANSLATION</i> <b>(124) Uruguay (14 Aug 2024 9:06 PM)</b> actions" debe traducirse como "acciones"
92	<u>Rastreabilidad</u> , distribución y transporte:	P	<i>Category : SUBSTANTIVE</i>  OIRSA <b>(51) CA (13 Aug 2024 8:28 PM)</b> Incluir Sistema de Rastreabilidad, debido que se requiere de la identificación de las semillas
93	<del>medidas acciones</del> <i>reglamentarias</i> : <del>establecimiento verificación de requisitos fitosanitarios de importación, auditoría o análisis en el momento de la importación</del> <u>trazabilidad</u> , <del>cuarentena posentrada</del> , certificación fitosanitaria;	P	<i>Category : TECHNICAL</i>  OIRSA <b>(125) Uruguay (14 Aug 2024 9:10 PM)</b> El texto borrado no corresponde a la etapa de distribución y transporte. En esta etapa es relevante incluir la verificación de la trazabilidad y la certificación fitosanitaria <b>OIRSA (21 Aug 2024 11:45 PM)</b> De acuerdo: no cambiar medidas por acciones y colocar rastreabilidad
94	<i>prácticas de producción</i> : <del>etiquetado para permitir la implementación de sistemas de</del> rastreabilidad, <u>que incluyan señalización, identificación, etiquetado y documentación</u> , aplicación de técnicas de saneamiento (por ejemplo, para garantizar que los medios de transporte están libres de contaminación), utilización de protocolos de análisis aprobados, mantenimiento de documentación.	P	<i>Category : SUBSTANTIVE</i> <b>(52) CA (13 Aug 2024 8:29 PM)</b> Incluir Sistema de Rastreabilidad, debido que se requiere de la identificación de las semillas
96	Los enfoques de sistemas <del>son una combinación de medidas y, dependiendo de los requisitos fitosanitarios de importación, que</del> pueden estar indicados en los certificados fitosanitarios como una declaración adicional, de conformidad con la NIMF 12. <u>Si se elaboran enfoques de sistemas para grupos de plagas, las ONPF deberían permitir que en las declaraciones adicionales se utilicen términos más genéricos en lugar enumerar solamente plagas individuales.</u>	P	<i>Category : TECHNICAL</i> <b>(126) Uruguay (15 Aug 2024 12:00 AM)</b> 1) para evitar duplicación, 2) Ultima frase fue movida desde el párrafo 58.
97	<b>3. Responsabilidades de las ONPF y las entidades participantes en el manejo del riesgo de plagas a lo largo de la cadena de suministro de semillas</b>	P	<i>Category : TECHNICAL</i>  OIRSA <b>(21) Uruguay (9 Aug 2024 6:14 AM)</b> Se sugiere mover el contenido de la sección 3 a la sección 8 para unificar en una sección todas las responsabilidades
98	Las ONPF son las responsables de determinar sistemáticamente las medidas que forman parte de un enfoque de sistemas y de comprobar su eficacia para reducir el riesgo de plagas planteado por posibles plagas asociadas a cada una de las etapas	P	<i>Category : TECHNICAL</i>  OIRSA <b>(230) OIRSA (19 Aug 2024 3:29 AM)</b>


	de producción. Estas medidas, que deberían estar en consonancia con las normas internacionales o regionales relativas al manejo del riesgo de plagas y los enfoques de sistemas, podrán incluir componentes de las prácticas de producción y los sistemas de garantía de la calidad existentes. Con vistas a mantener la flexibilidad y la innovación en el sistema, las entidades participantes podrán proponer nuevas medidas equivalentes para un punto crítico de control particular, cuya eficacia y viabilidad deberían ser evaluadas por las ONPF. En el <del>Apéndice 1 del presente anexo se exponen las medidas reglamentarias y no reglamentarias que llevan a cabo las ONPF y las entidades, respectivamente, en cada punto crítico de control a lo largo de la cadena de suministro de semillas.</del>		Ya fue indicado en el punto 2.3 del presente anexo, repitiéndose.
98	Las ONPF son las responsables de determinar sistemáticamente las medidas que forman parte de un enfoque de sistemas y de comprobar su eficacia para reducir el riesgo de plagas planteado por posibles plagas asociadas a cada una de las etapas de producción. Estas medidas, que deberían estar en consonancia con las normas internacionales o regionales relativas al manejo del riesgo de plagas y los enfoques de sistemas, podrán incluir componentes de las prácticas de producción y los sistemas de garantía de la calidad existentes. Con vistas a mantener la flexibilidad y la innovación en el sistema, las entidades participantes podrán proponer nuevas medidas equivalentes para un punto crítico de control particular, cuya eficacia y viabilidad deberían ser evaluadas por las ONPF. <del>En el Apéndice 1 del presente anexo se exponen las medidas reglamentarias y no reglamentarias que llevan a cabo las ONPF y las entidades, respectivamente, en cada punto crítico de control a lo largo de la cadena de suministro de semillas.</del>	P	<i>Category : EDITORIAL</i> <b>(152) Nicaragua (18 Aug 2024 6:18 PM)</b> esta repetido en el punto 2.3 del presente anexo
98	<del>Las ONPF son las responsables de determinar sistemáticamente las medidas que forman parte de un enfoque de sistemas y de comprobar su eficacia para reducir el riesgo de plagas planteado por posibles plagas asociadas a cada una de las etapas de producción. Estas medidas, que deberían estar en consonancia con las normas internacionales o regionales relativas al manejo del riesgo de plagas y los enfoques de sistemas, podrán incluir componentes de las prácticas de producción y los sistemas de garantía de la calidad existentes. Con vistas a mantener la flexibilidad y la innovación en el sistema, las entidades participantes podrán proponer nuevas medidas equivalentes para un punto crítico de control particular, cuya eficacia y viabilidad deberían ser evaluadas por las ONPF. En el Apéndice 1 del presente anexo se exponen las medidas reglamentarias y no reglamentarias que llevan a cabo las ONPF y las entidades, respectivamente, en cada punto crítico de control a lo largo de la cadena de suministro de semillas.</del>	P	<i>Category : TECHNICAL</i>  OIRSA <b>(22) Uruguay (9 Aug 2024 6:15 AM)</b> Se sugiere mover el contenido de este párrafo a la sección 8



	<del>lo largo de la cadena de suministro de semillas.</del>		
100	La verificación se debería realizar en varios <del>niveles-puntos</del> de la cadena de suministro de semillas. Las ONPF de los países exportadores deberían hacer un seguimiento del enfoque de sistemas para garantizar que el sistema funciona satisfactoriamente. Asimismo, deberían realizar auditorías periódicas y supervisar el efecto de las modificaciones resultantes del plan de las entidades participantes relativo al manejo del riesgo de plagas.	P	Category : TECHNICAL (23) Uruguay (9 Aug 2024 6:17 AM) Por consistencia
101	<del>Las ONPF deberían establecer los procedimientos de seguimiento y auditoría, así como los criterios para determinar cuándo se debe reevaluar un enfoque de sistemas de acuerdo con la NIMF 47 (Antes de suscribir un acuerdo sobre el enfoque de sistemas con las entidades, las ONPF deberían establecer los procedimientos de seguimiento y auditoría, así como los criterios para determinar cuándo se debe reevaluar un enfoque de sistemas (véase la NIMF 47, Auditoría en el contexto fitosanitario).</del>	P	Category : TECHNICAL  OIRSA (24) Uruguay (9 Aug 2024 6:21 AM) Para mejor entendimiento
102	<b>5. Establecimiento de los criterios de <del>rendimiento-desempeño</del> para la autorización de entidades participantes</b>	P	Category : EDITORIAL (231) OIRSA (19 Aug 2024 3:30 AM) uso correcto del término
102	<b>5. Establecimiento de los criterios de <del>rendimiento-desempeño</del> para la autorización de entidades participantes</b>	P	Category : EDITORIAL (155) Nicaragua (18 Aug 2024 6:22 PM) cambio de la palabra rendimiento por desempeño
102	<del>5. Establecimiento de los criterios de rendimiento para la autorización de entidades participantes</del>	P	Category : TECHNICAL  OIRSA (26) Uruguay (9 Aug 2024 6:28 AM) Sugerimos eliminar toda la sección 5 , No es apropiado incluir criterios de rendimiento para autorizar entidades en una NIMF, Si no se acepta la sugerencia debería re redactarse para describir cuales son esos criterios, como se aplican y como se evaluarán para determinar si se cumplen
103	Al elaborar un enfoque de sistemas, las ONPF deberían incorporar un mecanismo, atendiendo a criterios de <del>rendimiento-desempeño</del> , para autorizar a entidades de toda la cadena de suministro de semillas.	P	Category : EDITORIAL (232) OIRSA (19 Aug 2024 3:30 AM) uso correcto del término
103	Al elaborar un enfoque de sistemas, las ONPF deberían incorporar un mecanismo, atendiendo a criterios de <del>rendimiento-desempeño</del> , para autorizar a entidades de toda la cadena de suministro de semillas.	P	Category : EDITORIAL (154) Nicaragua (18 Aug 2024 6:22 PM)
103	<del>Al elaborar un enfoque de sistemas, las ONPF deberían incorporar un mecanismo, atendiendo a criterios de rendimiento, para autorizar a entidades de toda la cadena de suministro de semillas.</del>	P	Category : TECHNICAL (27) Uruguay (9 Aug 2024 6:29 AM) Sugerimos eliminar toda la sección 5 , No es apropiado incluir criterios de rendimiento para autorizar entidades en una NIMF, Si no se acepta la sugerencia debería re redactarse para describir cuales son esos criterios, como se aplican y


			como se evaluarán para determinar si se cumplen
104	Para que una entidad se considere compatible con el enfoque de sistemas, debería cumplir los criterios de <del>rendimiento-desempeño</del> relativos a cada una de las medidas asociadas al enfoque de sistemas que aplica. La entidad debería implementar un sistema de garantía de la calidad aprobado. La ONPF que elabora el enfoque de sistemas podrá evaluar y aprobar las prácticas de producción más eficaces de la entidad a fin de integrarlas en el enfoque de sistemas (véase la sección 2.3 del presente anexo).	P	Category : EDITORIAL <b>(233) OIRSA (19 Aug 2024 3:31 AM)</b> uso correcto del término
104	Para que una entidad se considere compatible con el enfoque de sistemas, debería cumplir los criterios de <del>rendimiento-desempeño</del> relativos a cada una de las medidas asociadas al enfoque de sistemas que aplica. La entidad debería implementar un sistema de garantía de la calidad aprobado. La ONPF que elabora el enfoque de sistemas podrá evaluar y aprobar las prácticas de producción más eficaces de la entidad a fin de integrarlas en el enfoque de sistemas (véase la sección 2.3 del presente anexo).	P	Category : EDITORIAL <b>(153) Nicaragua (18 Aug 2024 6:22 PM)</b> cambio de la palabra rendimiento por desempeño
104	<del>Para que una entidad se considere compatible con el enfoque de sistemas, debería cumplir los criterios de rendimiento relativos a cada una de las medidas asociadas al enfoque de sistemas que aplica. La entidad debería implementar un sistema de garantía de la calidad aprobado. La ONPF que elabora el enfoque de sistemas podrá evaluar y aprobar las prácticas de producción más eficaces de la entidad a fin de integrarlas en el enfoque de sistemas (véase la sección 2.3 del presente anexo).</del>	P	Category : TECHNICAL <b>(28) Uruguay (9 Aug 2024 6:29 AM)</b> Sugerimos eliminar toda la sección 5 , No es apropiado incluir criterios de rendimiento para autorizar entidades en una NIMF, Si no se acepta la sugerencia debería re redactarse para describir cuales son esos criterios, como se aplican y como se evaluarán para determinar si se cumplen
106	<del>Si varios países importadores reconocen el mismo enfoque de sistemas, este se convierte en un enfoque de sistemas multilateral, con capacidad para ajustarse al carácter multinacional del comercio de semillas. En los enfoques de sistemas multilaterales, debería prestarse especial atención a los elementos que tienen lugar en los países exportadores tras la detección de un caso de incumplimiento. If several importing countries recognise the same systems approach, it becomes a multilateral systems approach, capable of adjusting to the multinational nature of seed trade. In multilateral systems approaches, particular attention should be paid to the elements that occur in exporting countries following the detection of a case of non-compliance.</del>	P	Category : SUBSTANTIVE <b>(260) IPPC Regional Workshop Africa (21 Aug 2024 1:39 PM)</b> The language of global economics makes a distinction between a plurilateral arrangement and a multilateral arrangement as follows: A plurilateral agreement is a multi-national legal or trade agreement between countries (it is an agreement between more than two countries, but not a great many, which would be multilateral agreement).
106	Si varios países importadores reconocen el mismo enfoque de sistemas, este se convierte en un enfoque de sistemas multilateral, con capacidad para ajustarse al carácter multinacional del <del>comercio-movimiento</del> de semillas. <del>En los enfoques de sistemas multilaterales, debería prestarse especial atención a los elementos que</del>	P	Category : TECHNICAL  OIRSA <b>(29) Uruguay (9 Aug 2024 6:33 AM)</b> La última frase debe redactarse mejor para aclarar el significado o eliminarse

	<del>tienen lugar en los países exportadores tras la detección de un caso de incumplimiento.</del>		
108	Las ONPF que participan en un enfoque de sistemas deberían evaluar la eficacia de dicho enfoque. <del>Ello</del> Esto se puede hacer realizando estudios experimentales durante la fase de diseño antes de tratar de obtener el reconocimiento pleno del enfoque de sistemas para la certificación fitosanitaria.	P	Category : TRANSLATION <b>(270) Dominican Republic (21 Aug 2024 11:59 PM)</b>
108	Las ONPF que participan en un enfoque de sistemas deberían evaluar la eficacia de dicho enfoque. <del>Ello</del> Esto se puede hacer realizando estudios experimentales durante la fase de diseño antes de tratar de obtener el reconocimiento pleno del enfoque de sistemas para la certificación fitosanitaria.	P	Category : EDITORIAL <b>(234) OIRSA (19 Aug 2024 3:31 AM)</b>
108	Las ONPF que participan en un enfoque de sistemas deberían evaluar la eficacia de dicho enfoque. <del>Ello</del> Esto se puede hacer realizando estudios experimentales durante la fase de diseño antes de tratar de obtener el reconocimiento pleno del enfoque de sistemas para la certificación fitosanitaria.	P	Category : EDITORIAL <b>(156) Nicaragua (18 Aug 2024 6:42 PM)</b> cambiar Ello por esto
108	Las ONPF que participan en un enfoque de sistemas deberían evaluar la eficacia de dicho enfoque. Ello se puede hacer realizando estudios experimentales durante la fase de <del>diseño-implementación</del> antes de tratar de obtener el reconocimiento pleno del enfoque de <del>sistemas para la certificación fitosanitaria</del> sistemas.	P	Category : TECHNICAL  OIRSA <b>(63) Uruguay (13 Aug 2024 10:33 PM)</b> Los estudios pilotos deberían realizarse durante la fase de implementación
109	Estas evaluaciones se podrán llevar a cabo en un número representativo de envíos de <del>productos-especies</del> de semillas <del>en distintas etapas de producción</del> y durante un período de tiempo establecido.	P	Category : TECHNICAL  OIRSA <b>(64) Uruguay (13 Aug 2024 10:36 PM)</b> El párrafo refiere a la evaluación de envíos por lo tanto no aplicable a las etapas de producción
111	Al decidir si un enfoque de sistemas para <del>un determinado producto determinadas especies</del> de semillas es aceptable, las ONPF que participan en dicho enfoque deberían evaluar si reduce el riesgo de plagas hasta un nivel que permita cumplir los requisitos fitosanitarios de importación de todos los países participantes a lo largo de la cadena de suministro de semillas. En el caso de los países importadores, en esta evaluación se deberían considerar los puntos siguientes:	P	Category : TECHNICAL  OIRSA <b>(235) OIRSA (19 Aug 2024 3:32 AM)</b> mejor comprensión del párrafo
111	Al decidir si un enfoque de sistemas para <del>un determinado producto determinadas especies</del> de semillas es aceptable, las ONPF que participan en dicho enfoque deberían evaluar si reduce el riesgo de plagas hasta un nivel que permita cumplir los requisitos fitosanitarios de importación de todos los países participantes a lo largo de la cadena de suministro de semillas. En el caso de los países importadores, en esta evaluación se deberían considerar los puntos siguientes:	P	Category : EDITORIAL <b>(157) Nicaragua (18 Aug 2024 6:43 PM)</b> cambiar producto por semilla



111	Al decidir si un enfoque de sistemas para <del>un determinado producto una determinada especie</del> de semillas es aceptable, las ONPF que participan en dicho enfoque deberían evaluar si reduce el riesgo de plagas <del>hasta un nivel que permita cumplir los requisitos fitosanitarios de importación de todos los países participantes</del> a lo largo de la cadena de suministro de semillas. En el caso de los países importadores, en esta evaluación se deberían considerar los puntos siguientes:	P	Category : TECHNICAL  OIRSA <b>(65) Uruguay (13 Aug 2024 10:40 PM)</b> Para simplificar
116	<b>8. <del>Funciones y responsabilidades</del> Responsabilidades</b>	P	Category : TECHNICAL  OIRSA <b>(66) Uruguay (13 Aug 2024 10:41 PM)</b> Por consistencia
118	<del>Las responsabilidades de las ONPF se describen en la NIMF 14. Las ONPF son las responsables de evaluar el riesgo de plagas, establecer los requisitos fitosanitarios de importación, diseñar el sistema, evaluar la eficacia de las prácticas de producción y de los componentes del sistema de calidad para reducir el riesgo de plagas, determinar las medidas que componen el enfoque de sistemas y verificar su efectividad para reducir el riesgo de plagas asociada con cada una de las etapas de producción. En el Apéndice 1 del presente anexo se exponen las medidas reglamentarias y no reglamentarias que llevan a cabo las ONPF y las entidades, respectivamente, en cada punto crítico de control a lo largo de la cadena de suministro de semillas. Los enfoques de sistemas pueden ser elaborados por la ONPF (o múltiples ONPF) de cualquier país importador a lo largo de la cadena de suministro de semillas, en colaboración con las ONPF de los países exportadores y, si procede, las entidades que deseen participar en el enfoque de sistemas. Los enfoques de sistemas pueden ser elaborados por la ONPF (o múltiples ONPF) de cualquier país importador a lo largo de la cadena de suministro de semillas, en colaboración con las ONPF de los países exportadores y, si procede, las entidades que deseen participar en el enfoque de sistemas.</del>	P	Category : TECHNICAL  OIRSA <b>(67) Uruguay (13 Aug 2024 11:00 PM)</b> El texto agregado proviene del párrafo 98
119	Las ONPF de los países exportadores que participan en un enfoque de sistemas deberían comunicar las medidas integradas de dicho enfoque a las entidades que participan en <del>el en</del> sus respectivos territorios con vistas a su aplicación. Todas las ONPF con entidades participantes ubicadas en su territorio deberían disponer de un método para registrar cuáles de ellas están participando en el enfoque de sistemas para un producto de semillas específico y deberían comunicar dicha información a otras ONPF en caso necesario.	P	Category : EDITORIAL <b>(236) OIRSA (19 Aug 2024 3:32 AM)</b>
119	Las ONPF de los países exportadores que participan en un enfoque de sistemas	P	Category : EDITORIAL


	deberían comunicar las medidas integradas de dicho enfoque a las entidades que <del>participan-participan</del> en <del>él-en</del> sus respectivos territorios con vistas a su aplicación. Todas las ONPF con entidades participantes ubicadas en su territorio deberían disponer de un método para registrar cuáles de ellas están participando en el enfoque de sistemas para un producto de semillas específico y deberían comunicar dicha información a otras ONPF en caso necesario.		<b>(158) Nicaragua (18 Aug 2024 6:45 PM)</b> eliminación de palabra
119	Las ONPF de los países exportadores <del>que participan en un enfoque de sistemas</del> deberían comunicar las medidas integradas de dicho enfoque a las entidades que participan en él en sus respectivos territorios con vistas a su aplicación. Todas las ONPF con entidades participantes ubicadas en su territorio deberían disponer de un método para registrar cuáles de ellas están participando en el enfoque de sistemas para <del>un producto de</del> semillas <del>específico-específicas</del> y deberían comunicar dicha información a otras ONPF en caso necesario.	P	Category : <i>TECHNICAL</i>  OIRSA <b>(68) Uruguay (13 Aug 2024 11:02 PM)</b> For consistency
119	Las ONPF de los países exportadores que participan en un enfoque de sistemas deberían comunicar las medidas integradas de dicho enfoque a las entidades que participan en él en sus respectivos territorios con vistas a su aplicación. Todas las ONPF con entidades participantes ubicadas en su territorio deberían disponer de un método para registrar cuáles de ellas están participando en el enfoque de sistemas para un <del>producto-tipo</del> de semillas específico y deberían comunicar dicha información a otras ONPF en caso necesario.	P	Category : <i>EDITORIAL</i> <b>(57) CA (13 Aug 2024 9:30 PM)</b> Se considera pertinente el uso del termino tipo, en lugar de producto
119	Las ONPF de los países exportadores que participan en un enfoque de sistemas deberían comunicar las medidas integradas de dicho enfoque a las entidades que participan en él en sus respectivos territorios con vistas a su aplicación. Todas las ONPF con entidades participantes ubicadas en su territorio deberían disponer de un método para registrar cuáles de ellas están participando en el enfoque de sistemas para un <del>producto-tipo</del> de semillas específico y deberían comunicar dicha información a otras ONPF en caso necesario.	P	Category : <i>EDITORIAL</i> <b>(36) Colombia (10 Aug 2024 12:11 AM)</b> Se considera adecuado utilizar la palabra semilla en lugar del término "producto de semillas"
120	Todas las ONPF que participan en el enfoque de sistemas o lo reconocen deberían establecer un canal de comunicación entre ellas para mantenerse informadas sobre el grado de cumplimiento de todas las entidades participantes, especialmente si se aplican diferentes medidas en <del>diferentes-los</del> países.	P	Category : <i>EDITORIAL</i> <b>(58) CA (13 Aug 2024 9:32 PM)</b> Mejora la redacción y no repite la palabra diferentes
120	Todas las ONPF que participan en el enfoque de sistemas o lo reconocen deberían establecer un canal de comunicación entre ellas para mantenerse informadas sobre el grado de cumplimiento de todas las entidades participantes, especialmente si se	P	Category : <i>EDITORIAL</i> <b>(53) CA (13 Aug 2024 8:32 PM)</b> Duplicidad del término


	aplican diferentes medidas en <del>diferentes</del> países.		
121	Los casos de incumplimiento detectados se deberían comunicar a la ONPF del país exportador (país de origen o país de <del>exportación</del> ) <u>exportación</u> mediante la <u>elaboración de la correspondiente notificación de incumplimiento (NIMF 17)</u> . La detección de casos de incumplimiento debería dar lugar a la adopción de acciones correctivas para las entidades participantes especificadas en el acuerdo relativo al enfoque de sistemas. También puede conllevar el examen de cualquier medida específica en el enfoque de sistemas, cualquier parte del enfoque o el enfoque completo. Las ONPF de los países importadores y exportadores deberían aumentar el seguimiento después de haber detectado casos de incumplimiento críticos u otros casos (no críticos) de incumplimiento, y suspender inmediatamente el reconocimiento del enfoque de sistemas hasta que se adopten medidas correctivas (véase también la NIMF 45, <i>Requisitos para las organizaciones nacionales de protección fitosanitaria cuando autoricen a entidades para ejecutar acciones fitosanitarias</i> ).	P	<p>Category : TECHNICAL</p> <p> OIRSA  <b>(237) OIRSA (19 Aug 2024 3:33 AM)</b>  Aclaración de uso de la norma en el incumplimiento  <b>OIRSA (22 Aug 2024 3:46 PM)</b>  Si de acuerdo: cambiar por la NIMF 13</p>
121	Los casos de incumplimiento detectados se deberían comunicar a la ONPF del país exportador (país de origen o país de <del>exportación</del> ) <u>exportación</u> mediante la <u>elaboración de la correspondiente notificación de incumplimiento (NIMF 17)</u> . La detección de casos de incumplimiento debería dar lugar a la adopción de acciones correctivas para las entidades participantes especificadas en el acuerdo relativo al enfoque de sistemas. También puede conllevar el examen de cualquier medida específica en el enfoque de sistemas, cualquier parte del enfoque o el enfoque completo. Las ONPF de los países importadores y exportadores deberían aumentar el seguimiento después de haber detectado casos de incumplimiento críticos u otros casos (no críticos) de incumplimiento, y suspender inmediatamente el reconocimiento del enfoque de sistemas hasta que se adopten medidas correctivas (véase también la NIMF 45, <i>Requisitos para las organizaciones nacionales de protección fitosanitaria cuando autoricen a entidades para ejecutar acciones fitosanitarias</i> ).	P	<p>Category : EDITORIAL</p> <p><b>(159) Nicaragua (18 Aug 2024 6:51 PM)</b>  edición de redacción</p>
121	Los casos de incumplimiento detectados se deberían comunicar a <del>la-todas las</del> ONPF <u>que participan</u> del <del>país-exportador (país-enfoque de origen o país de exportación)</del> <u>sistemas</u> . La detección de casos de incumplimiento debería dar lugar a la adopción de acciones correctivas para las entidades participantes especificadas en el acuerdo relativo al enfoque de sistemas. También puede conllevar el examen	P	<p>Category : TECHNICAL</p> <p> OIRSA  <b>(69) Uruguay (13 Aug 2024 11:08 PM)</b>  1) para alertar a otras ONPF que algo esta mal con el enfoque de sistemas y se necesitan acciones correctivas, 2) para simplificar, 3) No siempre los no cumplimiento deben disparar la suspensión de una medida fitosanitaria (es decir el enfoque de sistemas) pero si evaluar si debe o no ser suspendida</p>



	de cualquier medida específica en el enfoque de sistemas, cualquier parte del enfoque o el enfoque completo. Las ONPF <del>de los países importadores y exportadores</del> deberían aumentar el seguimiento después de haber detectado casos de incumplimiento críticos u otros casos (no críticos) de incumplimiento, y <del>suspender inmediatamente considerar si debería suspenderse</del> el reconocimiento del enfoque de sistemas hasta que se adopten medidas correctivas (véase también la NIMF 45, <i>Requisitos para las organizaciones nacionales de protección fitosanitaria cuando autoricen a entidades para ejecutar acciones fitosanitarias</i> ).		
122	<u>En el caso de los enfoques de sistemas multilaterales, se deberían determinar las responsabilidades de cada una de las ONPF que participan en el enfoque de sistemas a lo largo de la cadena de suministro de semillas. Estas responsabilidades deberían incluir la identificación de las listas de plagas reglamentadas de cada una de las ONPF participantes, el análisis del riesgo de plagas asociado, la evaluación y la descripción de las medidas que forman parte del enfoque de sistemas y la determinación de los puntos críticos de control en el enfoque de sistemas en los que se deben aplicar dichas medidas.</u> <del>Las responsabilidades de los países importadores y exportadores en relación con los enfoques de sistemas se describen en la NIMF 14. En el caso de los enfoques de sistemas multilaterales, se deberían determinar las responsabilidades de cada una de las ONPF que participan en el enfoque de sistemas a lo largo de la cadena de suministro de semillas. Estas responsabilidades deberían incluir la armonización de las listas de plagas reglamentadas de cada uno de los países participantes, el análisis del riesgo de plagas asociado, la evaluación y la descripción de las medidas que forman parte del enfoque de sistemas y la determinación de los puntos críticos de control en el enfoque de sistemas en los que se deben aplicar dichas medidas.</del>	P	Category : TECHNICAL  OIRSA <b>(70) Uruguay (13 Aug 2024 11:12 PM)</b> 1) Primera frase movida al comienzo del párrafo por ser un requisito general, 2) La lista de plagas reglamentadas no se va a armonizar, sino que las ONPF deberán proporcionar sus listas de plagas reglamentadas
123	Como los países participantes en el enfoque de sistemas elaboran requisitos armonizados, las <del>OPF</del> ONPF que se incorporen al enfoque de sistemas deberían evaluar si tienen la capacidad de cumplir los requisitos fitosanitarios relativos a los elementos del enfoque de sistemas que les sean aplicables.	P	Category : EDITORIAL <b>(238) OIRSA (19 Aug 2024 3:33 AM)</b>
123	Como los países participantes en el enfoque de sistemas elaboran requisitos armonizados, las <del>OPF</del> ONPF que se incorporen al enfoque de sistemas deberían evaluar si tienen la capacidad de cumplir los requisitos fitosanitarios relativos a los elementos del enfoque de sistemas que les sean aplicables.	P	Category : EDITORIAL <b>(160) Nicaragua (18 Aug 2024 6:55 PM)</b> Corrección de palabra ONPF
123	Como <del>los países</del> las ONPF participantes en el enfoque de sistemas elaboran	P	Category : TECHNICAL <b>(71) Uruguay (13 Aug 2024 11:14 PM)</b>




	requisitos armonizados, las <del>OPF-ONPF</del> que se incorporen al enfoque de sistemas deberían evaluar si tienen la capacidad de cumplir los requisitos fitosanitarios <u>de importación</u> relativos a los elementos del enfoque de sistemas que les sean aplicables.		For consistency
123	Como los países participantes en el enfoque de sistemas elaboran requisitos armonizados, las <del>OPF-ONPF</del> que se incorporen al enfoque de sistemas deberían evaluar si tienen la capacidad de cumplir los requisitos fitosanitarios relativos a los elementos del enfoque de sistemas que les sean aplicables.	P	Category : EDITORIAL 🇨🇦 <b>(37) Colombia (10 Aug 2024 12:12 AM)</b> En el texto dice OPF y es ONPF
125	Las entidades <u>autorizadas a participar en un enfoque de sistemas deben cumplir los requisitos de la NIMF 45. Las entidades</u> que participan en un enfoque de sistemas deberían colaborar con las ONPF en relación con lo siguiente:	P	Category : TECHNICAL <b>(72) Uruguay (13 Aug 2024 11:16 PM)</b> Hacer referencia a NIMF relevante
126	<del>Las entidades participantes deberían</del> determinar los países que intervienen en la cadena de suministro de semillas <del>del producto de</del> <u>la especie de</u> semillas.	P	Category : TECHNICAL 🇨🇦 <b>(73) Uruguay (13 Aug 2024 11:19 PM)</b> Se elimina texto para evitar redundancia <b>OIRSA (22 Aug 2024 3:58 PM)</b> De acuerdo: quedaría hasta "suministro de semillas"
126	<del>Las entidades participantes deberían</del> determinar los países que intervienen en la cadena de suministro de semillas del producto de semillas.	P	Category : EDITORIAL <b>(239) OIRSA (19 Aug 2024 3:34 AM)</b>
126	<del>Las entidades participantes deberían</del> determinar los países que intervienen en la cadena de suministro de semillas <del>del producto de semillas.</del>	P	Category : EDITORIAL <b>(161) Nicaragua (18 Aug 2024 6:58 PM)</b> revisión de parrafo
126	Las entidades participantes deberían determinar los países que intervienen en la cadena de suministro de <del>semillas del producto de</del> semillas.	P	Category : EDITORIAL 🇨🇦 <b>(38) Colombia (10 Aug 2024 12:13 AM)</b> Se considera adecuado utilizar la palabra semilla en lugar del término "producto de semillas"
127	<del>Si una ONPF desea elaborar un enfoque de sistemas, debería hacer una relación de las plagas reglamentadas que pueden estar asociadas al producto de semillas en la cadena de suministro de semillas. Las entidades participantes deberían</del> proporcionar toda la información de interés sobre las prácticas de producción y los sistemas de garantía de la calidad, en especial los datos relacionados con la eficacia de las prácticas para reducir el riesgo de plagas, a fin de que la ONPF pueda evaluar dichas prácticas con vistas a incluirlas en el enfoque de sistemas. Esta información podrá guardar relación con las prácticas que se lleven a cabo en cualquier etapa de la producción y la distribución de semillas y con las medidas aplicadas en otros países a lo largo de la cadena de suministro de semillas.	P	Category : TECHNICAL 🇨🇦 <b>(240) OIRSA (19 Aug 2024 3:35 AM)</b> Ya abordado en el punto No. 2 del presente anexo


127	<del>Si una ONPF desea elaborar un enfoque de sistemas, debería hacer una relación de las plagas reglamentadas que pueden estar asociadas al producto de semillas en la cadena de suministro de semillas. Las entidades participantes deberían</del> proporcionar toda la información de interés sobre las prácticas de producción y los sistemas de garantía de la calidad, en especial los datos relacionados con la eficacia de las prácticas para reducir el riesgo de plagas, a fin de que la ONPF pueda evaluar dichas prácticas con vistas a incluirlas en el enfoque de sistemas. Esta información podrá guardar relación con las prácticas que se lleven a cabo en cualquier etapa de la producción y la distribución de semillas y con las medidas aplicadas en otros países a lo largo de la cadena de suministro de semillas.	P	Category : EDITORIAL <b>(162) Nicaragua (18 Aug 2024 6:59 PM)</b> se elimina líneas que están abordadas en el punto 2
127	<del>Si una ONPF desea elaborar un enfoque de sistemas, debería hacer una relación de las plagas reglamentadas que pueden estar asociadas al producto de semillas en la cadena de suministro de semillas. Las entidades participantes deberían</del> proporcionar toda la información de interés sobre las prácticas de producción y los sistemas de garantía de la calidad, en especial los datos relacionados con la eficacia de las prácticas para reducir el riesgo de plagas, a fin de que la ONPF pueda evaluar dichas prácticas con vistas a incluirlas en el enfoque de sistemas. Esta información podrá guardar relación con las prácticas que se lleven a cabo en cualquier etapa de la producción y la distribución de semillas y con las medidas aplicadas en otros países a lo largo de la cadena de suministro de semillas.	P	Category : TECHNICAL <b>(74) Uruguay (13 Aug 2024 11:20 PM)</b> Esta es una responsabilidad de la ONPF y no de las entidades
128	<b>8.2.1 Sistemas de garantía de la calidad para la autorización de entidades</b>	P	Category : TECHNICAL  OIRSA <b>(241) OIRSA (19 Aug 2024 3:35 AM)</b> Revisar esta sección, puede confundir con calidad del producto y no con la del proceso  El ámbito de la presente norma no aplica un sistema de la gestión de la calidad.
128	<b>8.2.1 Sistemas de garantía de la calidad para la autorización de entidades</b>	P	Category : SUBSTANTIVE <b>(75) Uruguay (13 Aug 2024 11:23 PM)</b> Se sugiere eliminar toda la sección ya que describe componentes de los sistemas de calidad sin relación con el impacto de estos componentes para reducir el riesgo de plagas. La sección es simplemente una descripción de los aspectos de calidad en sí mismos
129	<del>La utilización de sistemas de garantía de la calidad permite formalizar los procesos empleados para mantener la calidad y sienta las bases de la estabilidad, lo que puede dar lugar a la entrega de productos con una calidad predecible o fiable. Los sistemas de garantía de la calidad son el mecanismo que permite armonizar los</del>	P	Category : TECHNICAL  OIRSA <b>(242) OIRSA (19 Aug 2024 3:36 AM)</b> Revisar esta sección, puede confundir con calidad del producto y no con la del proceso

	<del>procesos y la calidad de los productos independientemente del país de origen.</del>		El ámbito de la presente norma no aplica un sistema de la gestión de la calidad.
129	La utilización de sistemas de garantía de la calidad permite formalizar los procesos empleados para mantener la calidad <del>y sienta las bases de la estabilidad</del> , lo que puede dar lugar a la entrega de productos con una calidad predecible o fiable. Los sistemas de garantía de la calidad son el mecanismo que permite armonizar los procesos y la <del>calidad-fitosanidad</del> de los productos independientemente del país de origen.	P	Category : EDITORIAL <b>(163) Nicaragua (18 Aug 2024 7:03 PM)</b> Revisar esta sección puede confundir con calidad del producto
129	<del>La utilización de sistemas de garantía de la calidad permite formalizar los procesos empleados para mantener la calidad y sienta las bases de la estabilidad, lo que puede dar lugar a la entrega de productos con una calidad predecible o fiable. Los sistemas de garantía de la calidad son el mecanismo que permite armonizar los procesos y la calidad de los productos independientemente del país de origen.</del>	P	Category : SUBSTANTIVE <b>(76) Uruguay (13 Aug 2024 11:24 PM)</b> Ver comentario en párrafo 128
130	<del>Los sistemas de garantía de calidad de las entidades deberían comprender, como mínimo:</del>	P	Category : SUBSTANTIVE <b>(77) Uruguay (13 Aug 2024 11:24 PM)</b> Ver comentario en párrafo 128
131	<del>una política relativa a la calidad que describa el compromiso y los objetivos que la entidad trata de lograr;</del>	P	Category : SUBSTANTIVE <b>(78) Uruguay (13 Aug 2024 11:25 PM)</b> Ver comentario en párrafo 128
132	<del>procedimientos normalizados de actuación, que son los métodos detallados que se ejecutan para producir el producto de calidad;</del>	P	Category : SUBSTANTIVE <b>(79) Uruguay (13 Aug 2024 11:25 PM)</b> Ver comentario en párrafo 128
133	<del>sistemas de capacitación, auditoría y anuncio de acciones correctivas;</del>	P	Category : SUBSTANTIVE <b>(80) Uruguay (13 Aug 2024 11:26 PM)</b> Ver comentario en párrafo 128
134	<del>mantenimiento de registros;</del>	P	Category : SUBSTANTIVE <b>(81) Uruguay (13 Aug 2024 11:26 PM)</b> Ver comentario en párrafo 128
135	<del>mejora continuada.</del>	P	Category : SUBSTANTIVE <b>(82) Uruguay (13 Aug 2024 11:26 PM)</b> Ver comentario en párrafo 128
136	<b>8.2.2 <u>1 Trazabilidad</u></b>  <u>Las entidades participantes deberían asegurar que se mantienen registros adecuados para permitir la trazabilidad en relación a todos los puntos críticos de control a lo largo de la cadena de suministro de semillas. Estos registros deberían mantenerse in el país exportador para aquellas medidas que se aplican previo a la exportación o durante el tránsito y en el país importador para as medidas tomadas en el país</u>	P	Category : SUBSTANTIVE  <b>OIRSA</b> <b>(83) Uruguay (14 Aug 2024 3:36 AM)</b> Se sugiere considerar agregar texto en relacion a la trazabilidad que es importante en un enfoque de sistemas. El texto propuesto está alineado con el Anexo a la NIMF 39 que esta en consulta <b>OIRSA (22 Aug 2024 4:06 PM)</b> de acuerdo: Las entidades participantes deberían asegurar que se mantienen registros adecuados para permitir la rastreabilidad en relación a todos los puntos críticos de control a lo largo de la cadena de suministro de semillas.

	<u>importador</u>		Estos registros deberían mantenerse durante el tiempo acordado por las ONPF participantes, para aquellas medidas que se aplican en la exportación o durante el tránsito, como en el país importador para las medidas tomadas en dicho país.
	<b>8.2.2 Notificación y gestión de los casos de incumplimiento</b>		
136	<b>8.2.2 <del>Notificación</del> <u>Comunicación</u> y gestión de los casos de incumplimiento</b>	P	Category : TECHNICAL  OIRSA <b>(243) OIRSA (19 Aug 2024 3:38 AM)</b> uso correcto del término
136	<b>8.2.2 <del>Notificación</del> <u>Comunicación</u> y gestión de los casos de incumplimiento</b>	P	Category : EDITORIAL <b>(168) Nicaragua (18 Aug 2024 7:21 PM)</b> cambio de notificación por comunicación
137	Las entidades que participan en un enfoque de sistemas deberían contar con un procedimiento acordado con la ONPF que concede la autorización para notificar <u>los casos de incumplimiento</u> , la detección de plagas reglamentadas y las acciones correctivas adoptadas al respecto. Las partes que incurran en un incumplimiento crítico o en múltiples incumplimientos de otro tipo podrán ser excluidas del enfoque de sistemas.	P	Category : TECHNICAL <b>(244) OIRSA (19 Aug 2024 3:38 AM)</b> mejor comprensión del párrafo
137	Las entidades que participan en un enfoque de sistemas deberían contar con un procedimiento acordado con la ONPF que concede la <del>autorización</del> <u>autorización</u> , para notificar <u>los casos de incumplimiento</u> , la detección de plagas reglamentadas y las acciones correctivas adoptadas al respecto. Las partes que incurran en un incumplimiento crítico o en múltiples incumplimientos de otro tipo podrán ser excluidas del enfoque de sistemas.	P	Category : EDITORIAL <b>(167) Nicaragua (18 Aug 2024 7:20 PM)</b> redacción
137	Las entidades que participan en un enfoque de sistemas deberían contar con un procedimiento acordado con la ONPF que concede la <del>autorización</del> <u>autorización</u> , para notificar la detección de plagas reglamentadas y las acciones correctivas adoptadas al respecto. Las partes que incurran en un incumplimiento crítico o en múltiples incumplimientos de otro tipo podrán ser excluidas del enfoque de sistemas.	P	Category : EDITORIAL <b>(166) Nicaragua (18 Aug 2024 7:19 PM)</b> Autorización
137	Las entidades que participan en un enfoque de sistemas deberían contar con un procedimiento acordado con la <del>ONPF que concede la autorización</del> <u>ONPF</u> para notificar la detección de plagas reglamentadas y las acciones correctivas adoptadas al respecto. Las partes que incurran en un incumplimiento crítico o en múltiples incumplimientos de otro tipo podrán ser excluidas del enfoque de sistemas.	P	Category : EDITORIAL <b>(165) Nicaragua (18 Aug 2024 7:17 PM)</b> quitar concede autorización
137	Las entidades que participan en un enfoque de sistemas deberían contar con un procedimiento acordado con la ONPF <del>que concede la autorización</del> para <del>notificar</del>	P	Category : EDITORIAL <b>(164) Nicaragua (18 Aug 2024 7:13 PM)</b> se elimina conceder

	<u>notificarle</u> la detección de plagas reglamentadas y las acciones correctivas adoptadas al respecto. Las partes que incurran en un incumplimiento crítico o en múltiples incumplimientos de otro tipo podrán ser excluidas del enfoque de sistemas. <u>(vease también NIMF 17)</u>		
137	Las entidades que participan en un enfoque de sistemas deberían contar con un procedimiento acordado con la ONPF que concede la autorización para notificar <del>la detección de plagas reglamentadas las no-conformidades</del> y las acciones correctivas adoptadas al respecto. <u>Estos procedimientos debería establecerlos la ONPF durante la fase de diseño del enfoque de sistemas.</u> Las partes que incurran en un incumplimiento crítico o en múltiples incumplimientos de otro tipo podrán ser excluidas del enfoque de sistemas.	P	<p>Category : <i>TECHNICAL</i></p> <p> OIRSA  <b>(84) Uruguay (14 Aug 2024 3:41 AM)</b>  La detección de plagas reglamentadas es un tipo de no conformidad y los procedimientos deben ser establecidos en la fase de diseño del enfoque de sistemas</p>
137	Las entidades que participan en un enfoque de sistemas deberían contar con un procedimiento acordado con la ONPF <u>(basado en la NIMF 13)</u> que concede la autorización para notificar la detección de plagas reglamentadas y las acciones correctivas adoptadas al respecto. Las partes que incurran en un incumplimiento crítico o en múltiples incumplimientos de otro tipo podrán ser excluidas del enfoque de sistemas.	P	<p>Category : <i>TECHNICAL</i></p> <p><b>(59) CA (13 Aug 2024 9:35 PM)</b>  Incluir que el procedimiento acordado se base en la NIMF 13</p>
137	Las entidades que participan en un enfoque de sistemas deberían contar con un procedimiento acordado con la ONPF que concede la autorización para notificar la detección de plagas reglamentadas y las acciones correctivas adoptadas al respecto. Las partes que incurran en un incumplimiento crítico o en múltiples incumplimientos de otro tipo podrán ser excluidas del enfoque de sistemas.	C	<p>Category : <i>TECHNICAL</i></p> <p><b>(6) Ecuador (31 Jul 2024 7:13 PM)</b>  Incluir que el procedimiento acordado se base en la NIMF 13</p> <p>texto propuesto: Las entidades que participan en un enfoque de sistemas deberían contar con un procedimiento acordado con la ONPF que concede la autorización para notificar la detección de plagas reglamentadas y las acciones correctivas adoptadas al respecto (basado en la NIMF 13). Las partes que incurran en un incumplimiento crítico o en múltiples incumplimientos de otro tipo podrán ser excluidas del enfoque de sistemas.</p>
138	<del>El informe de la entidad para la ONPF debería contener un análisis de las causas profundas que permita determinar las causas de la no-conformidad, los ajustes propuestos al enfoque de sistemas y cómo se podrá comprobar la eficacia de dichos ajustes. Este requisito incluye la detección de plagas en las instalaciones de la entidad autorizada (véase la NIMF 45 para obtener orientación al respecto). El informe de la entidad para la ONPF debería contener un análisis de las causas profundas que permita determinar cómo se introdujo la plaga reglamentada en la cadena de suministro de semillas, los ajustes propuestos al enfoque de sistemas en respuesta a la detección de una plaga y cómo se podrá comprobar la eficacia de dichos ajustes.</del>	P	<p>Category : <i>TECHNICAL</i></p> <p> OIRSA  <b>(85) Uruguay (14 Aug 2024 3:44 AM)</b>  Por consistencia con el párrafo 137</p>

140	Se debería informar a la ONPF que concede la autorización de los casos de incumplimiento crítico (véanse la NIMF 45 <del>y la NIMF 36</del> para obtener orientación al respecto) durante el plazo indicado en el acuerdo de autorización. La notificación debería comprender la confirmación oficial de la identidad de la plaga y la determinación de la respuesta reglamentaria.	P	Category : TECHNICAL  OIRSA <b>(86) Uruguay (14 Aug 2024 3:45 AM)</b> NIMF 36 no es de aplicación para semillas <b>OIRSA (22 Aug 2024 4:23 PM)</b> quitar tambien NIMF 45
141	La entidad debería documentar el procedimiento mediante el cual informa a la ONPF que <del>concede la autorización</del> <u>autoriza</u> de otros casos de incumplimiento en el plazo acordado por la ONPF y la entidad.	P	Category : TECHNICAL <b>(245) OIRSA (19 Aug 2024 3:39 AM)</b> uso correcto del término
141	La entidad debería documentar el procedimiento mediante el cual informa a la ONPF que <del>concede la autorización</del> <u>autoriza</u> de otros casos de incumplimiento en el plazo acordado por la ONPF y la entidad.	P	Category : EDITORIAL <b>(170) Nicaragua (18 Aug 2024 7:24 PM)</b> cambio de redacción
141	La entidad debería documentar el procedimiento mediante el cual informa a la ONPF que concede la autorización de otros casos de incumplimiento en el plazo acordado por la ONPF y la entidad.  <u>Además las no-conformidades detectadas por la ONPF del país importador, la notificación debe seguir los requisitos de la NIMF 13</u>	P	Category : TECHNICAL  OIRSA <b>(87) Uruguay (14 Aug 2024 3:48 AM)</b> Se sugiere incluir texto en referencia a la notificación de incumplimiento de acuerdo con la NIMF 13
145	<del>APÉNDICE 1 DEL ANEXO 1: Ejemplo de los puntos críticos de control a lo largo de la cadena de suministro de semillas en el que existen consideraciones relativas al riesgo de plagas para las semillas y dichos riesgos se pueden manejar mediante las medidas reglamentarias de las ONPF junto con las acciones de las entidades participantes</del> <u>APÉNDICE 1 DEL ANEXO 1: Ejemplo de los puntos críticos de control a lo largo de la cadena de suministro de semillas en el que existen consideraciones relativas al riesgo de plagas para las semillas y dichos riesgos se pueden manejar mediante las medidas reglamentarias de las ONPF junto con las acciones de las entidades participantes</u>	P	Category : TECHNICAL  Honduras; OIRSA <b>(246) OIRSA (19 Aug 2024 3:40 AM)</b> Actualizar según lo abordado en el cuerpo del anexo


150	<a href="#">Actualizar según lo abordado en el texto</a>	P	Category : EDITORIAL (169) Nicaragua (18 Aug 2024 7:23 PM)
150		C	Category : SUBSTANTIVE (7) Ecuador (31 Jul 2024 7:14 PM) En el esquema, en cuadro "después de la producción) se mencionan tratamiento de calor, agua caliente; que no serían bien aplicadas a semillas para plantar , pues pueden disminuir su capacidad de germinación; también menciona procesos de molienda, este proceso no sería utilizado en semillas para plantar; por lo cual se sugiere eliminar estos términos

**2024 FIRST CONSULTATION 1 July – 30 September 2024****Compiled comments for Draft annex to ISPM 38 (*International movement of seeds*) on the design and use of systems approaches (2018-009) - French**

**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
G	(General Comment)	C	Category : <i>SUBSTANTIVE</i> <b>(553) Benin (26 Sep 2024 1:34 PM)</b> Pas de commentaire
34	La terminologie employée dans la présente annexe est la suivante:	C	Category : <i>SUBSTANTIVE</i> <b>(827) Madagascar (30 Sep 2024 10:21 PM)</b> La terminologie de l'approche systémique par rapport à cette proposition de normes aurait dû être insérée
35	le terme «entités» désigne l'ensemble des parties autres que les ONPV qui interviennent dans la chaîne d'approvisionnement semencière, telles que les producteurs de semences et les entreprises qui effectuent des traitements;	C	Category : <i>SUBSTANTIVE</i> <b>(250) Gabon (20 Aug 2024 4:03 AM)</b> Le mot "entités" doit être remplacé par "parties prenantes".
43	<b>1.2 Contexte</b>	C	Category : <i>SUBSTANTIVE</i> <b>(826) Congo, DR (30 Sep 2024 9:28 PM)</b> Nous soutenons ce projet d'annexe qui vient clarifier et compléter certaines dispositions de la norme 38
46	Le cadre repose sur une combinaison de mesures pouvant comprendre, outre les mesures phytosanitaires couramment utilisées, des éléments de pratiques de production et de systèmes d'assurance de la qualité utilisés par les entités participantes. Les approches systémiques découlant de ce cadre sont élaborées par les ONPV, qui prennent en considération chacun des points de contrôle critiques rencontrés tout au long de la chaîne d'approvisionnement semencière. L'une des exigences fixée par le cadre est que chaque entité participant à l'approche systémique soit agréée par l'ONPV du pays d'origine.	C	Category : <i>EDITORIAL</i> <b>(262) Senegal (21 Aug 2024 1:44 PM)</b> ce
47	Une approche systémique peut être utilisée comme <u>solution de rechange mesure</u> équivalente <u>équivalente</u> aux traitements phytosanitaires indépendants aux fins de la gestion du risque phytosanitaire (voir la NIMP 14) associé aux déplacements des semences. Si des approches systémiques sont utilisées, elles devraient être élaborées par des ONPV. La présente annexe décrit les responsabilités qui incombent aux ONPV et, s'il y a lieu, les exigences élémentaires devant être satisfaites par chacune des entités participant à l'approche systémique.	P	Category : <i>EDITORIAL</i> <b>(263) Senegal (21 Aug 2024 1:46 PM)</b>

51	<p>Les caractéristiques qui distinguent la production et le commerce des semences de la production et du commerce d'autres plantes et produits végétaux sont les périodes potentiellement longues durant lesquelles les semences peuvent être stockées et livrées, ainsi que le fait que les semences peuvent être livrées à de nombreux clients différents dans différents pays et réexportées à de multiples reprises. Les approches systémiques pour les semences – en particulier celles qui comprennent des mesures et des pratiques utilisées sur la chaîne d'approvisionnement semencière – peuvent avoir à déterminer si des exigences particulières sont requises pour:</p>	<p>C</p> <p>Category : <i>EDITORIAL</i></p> <p> Cameroon</p> <p><b>(41) Senegal (12 Aug 2024 12:32 PM)</b></p> <p>les semences peuvent être livrées</p>
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