



منظمة الأغذية
والزراعة
للأمم المتحدة

联合国
粮食及
农业组织

Food
and
Agriculture
Organization
of
the
United
Nations

Organisation
des
Nations
Unies
pour
l'alimentation
et
l'agriculture

Organización
de las
Naciones
Unidas
para la
Agricultura
y la
Alimentación

COMMISSION ON PHYTOSANITARY MEASURES

Third Session

Rome, 7 - 11 April 2008

**Comments on draft standards (CPM 2008/2 - Annex 2)
Establishment of areas of low pest prevalence for fruit flies
(Tephritidae)**

Agenda Item 9.2 of the Provisional Agenda

Document by the IPPC Secretariat

1. The Secretariat compiled comments received in advance of the CPM on the draft ISPM on areas of low pest prevalence for fruit flies (Tephritidae) from the following members and RPPOs:

- Argentina
- Australia
- Bolivia
- Brazil
- Chile
- COSAVE
- EC and its Member States
- EPPO
- Japan
- Paraguay
- Republic of Korea
- USA
- Uruguay

For reasons of economy, this document is produced in a limited number of copies. Delegates and observers are kindly requested to bring it to the meetings and to refrain from asking for additional copies, unless strictly indispensable.
Most FAO meeting documents are available on Internet at www.fao.org

DRAFT ISPM: ESTABLISHMENT OF AREAS OF LOW PEST PREVALENCE FOR FRUIT FLIES (TEPHRITIDAE)

The following are comments received as of 04 April 2008 according to guidelines given in the document CPM 2008/2. The Secretariat has compiled the comments, as provided by members, in the order of the text.

	1. Section	2. COUNTRY	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
1.	GENERAL COMMENTS	Japan	General comments		We believe that this proposed standard would be easier to use and apply for NPPOs if annexed to ISPM No22, <i>Requirements of the establishment of areas of low pest prevalence</i> . In this regard, we would like to suggest considering this issue more generally in conjunction with our proposing work, “Reorganization of existing ISPMs”.	
2.	BACKGROUND	Australia	Editorial	Para 2, sentence 2	The high probability of introduction of fruit flies associated with a wide range of hosts results in restrictions imposed by many importing countries and the need for phytosanitary measures to be applied in exporting countries related to movement of host material or regulated articles to ensure that the risk of introduction is appropriately mitigated.	Sentence too long - split
3.	BACKGROUND	Australia	editorial	Para 4, sentence 1	FF-ALPPs are generally used as a buffer zone	
4.	BACKGROUND	Australia	substantive	Para 4, sentence 1		When is an FF ALPP likely to be used as part of an eradication ?
5.	BACKGROUND	Japan	Substantive/Editorial	Para. 5	They may occur naturally (and subsequently be verified by surveillance, declared and monitored or otherwise managed); they may occur as a result of pest management practices <u>control</u> during crop production that suppress the population of fruit flies in an area to limit their impact on the crop; or they may be established as a result of management practices <u>control</u> that reduce the number of fruit flies in the area to a specified low level.	It is requirements which do not need to be described in the background section. The meaning of management practices is unclear since there is no definition on management practices in ISPM No. 5. Control is more appropriate.
6.	BACKGROUND	Australia	substantive	Para 6, sentence 1	The decision to establish an FF-ALPP may be closely linked to market access as well as to economic and operational feasibility <u>and/or viability</u> .	
7.	BACKGROUND	Australia	substantive	Para 7, sentence 1	...should be determined and agreed <u>to</u> in conjunction with...	
8.	BACKGROUND	European Commission and its	Substantive	Last Para [para 8]	Delete	Reference to domestic trade is not in ISPM 26, so it is not appropriate to include here

	1. Section	2. COUNTRY	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
		member states (hereafter “EC”), EPPO				
9.	BACKGROUND	USA	editorial	Last paragraph	“The requirements for the establishment of FF-ALPPs in this standard can also be applied in domestic trade for movement of fruit within a country”.	
10.	BACKGROUND	Australia	substantive	Para 8, sentence 1	The requirements for the establishment of FF-ALPPs laid down in this standard can also be applied in domestic trade for movement of fruit in between ALPPs within a country.	
11.	BACKGROUND	Japan	Substantive/Editorial	after last para. [para 8]	Add <u>The target pests for which this standard was developed include insects of the order Diptera, family Tephritidae, of the genera <i>Anastrepha</i>, <i>Bactrocera</i>, <i>Ceratitis</i>, <i>Dacus</i>, <i>Rhagoletis</i> and <i>Toxotrypana</i>.</u>	In line with ISPM No. 26 (background, second para.)
12.	REQUIREMENTS	Australia	Editorial	Para2 sentence 2	Some of them may require the application of	
13.	1. General Requirements	EC, EPPO	Editorial	Para 3, 3 rd sentence	Delete ‘necessary’	Superfluous
14.	1.1 Operational plans	Australia	Editorial	Para 1	An official operational plan is needed to specify the required phytosanitary procedures required to establish and maintain an FF-ALPP.	
15.	1.2 Determination of an FF-ALPP	USA	technical	1 st paragraph, 3 rd indent	“- location, abundance and seasonality of hosts, including wherever possible specifying biologically preferred hosts”	The use of terms like “primary” and “secondary” hosts is not really accurate. It is confusing. More useful to refer to “host”, “non-host”, “preferred host”. Depending on what hosts are available, primary and secondary host status does not really apply. In some cases, secondary hosts may be preferred if other hosts are not available.
16.	1.2 Determination of an FF-ALPP	Australia	substantive	Para 1, new dash point	- Identification of factors limiting and keeping fruit fly population at low levels.	Should identify (with substantive justification) what is limiting the fruit fly population and keeping it at a low level
17.	1.2 Determination of an FF-ALPP	Australia	substantive	Para 2, sentences 2	In such cases, surveillance should be undertaken at times of likely peak numbers and over appropriate length of time to validate the low prevalence status and this status may be recognized in accordance with the examples listed in section 3.1.1 of ISPM No. 8 (<i>Determination of pest status in an area</i>).	With regard to trapping, need to refer here or elsewhere (eg. 1.3 Para 2, bullet points) to the timing and duration of trap records that are being used to demonstrate that an area has low pest prevalence status. For example, traps used over winter or for a small period of time

	1. Section	2. COUNTRY	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
						or single season may have limited value in proving low pest status.
18.	1.2 Determination of an FF-ALPP	Australia	substantive	Para 2, sentences 3	.. (for example, eg because of extraordinary climatic conditions or other reasons)	
19.	1.3 Documentation and record keeping	Australia	editorial	Para 2, dash point 2	and meteorological conditions climate , for example rainfall,	
20.	1.3 Documentation and record keeping	Australia	substantive	Para 2, bullet points		Refer to comment at 1.2 para 2 sentence 2
21.	1.3 Documentation and record keeping	Rep. Korea	Substantive	2 nd para 3 rd dashpoint	- surveillance records: trapping: types of surveys, number and type of traps and lures, frequency of trap inspection, trap density, trap array, number of target fruit flies captured by species for each trap, <u>trap servicing</u> fruit sampling: type, quantity, date, frequency and result	Trap servicing (frequency of bait change, maintenance etc) is an important component of trapping: refer ISPM 26 2.2.2.1
22.	1.4 Supervision activities	Australia	Editorial	Para 2 sentence 1	The NPPO should evaluate and/or audit	Intent is vague if ‘and/or’ is used. If both evaluation and auditing are required use ‘and’ if either is acceptable use ‘or’.
23.	2.1.1 Determination of the specified level of low pest prevalence	Australia	Editorial	Para 2 2 nd dash point bracketed text	“... including experience and/or historical data ...”	Intent is vague if ‘and/or’ is used. If both evaluation and auditing are required use ‘and’ if either is acceptable use ‘or’.
24.	2.1.2 Geographical description	Australia	Editorial	Para 1	required for establishment of FF-ALPPs	
25.	2.1.2 Geographical description	USA	technical	2 nd paragraph	Boundaries used to describe the delimitation of the FF-ALPP should be established and closely related to the relative presence of hosts of the target fruit fly species or adjusted to readily recognizable boundaries.	See above explanation. [The use of terms like “primary” and “secondary” hosts is not really accurate. It is confusing. More useful to refer to “host”, “non-host”, “preferred host”. Depending on what hosts are available, primary and secondary host status does not really apply. In some cases, secondary hosts may be preferred if other hosts are not available.]
26.	2.1.2 Geographic description	Rep. Korea	substantive	2 nd para	Boundaries used to describe the delimitation of the FF-ALPP should be established and closely related to the relative presence of hosts of the target fruit fly species or adjusted to readily recognizable boundaries.	Delete primary . Both of primary and secondary hosts can affect
27.	2.1.3 Surveillance	USA	technical	End of paragraph	“...host availability and appropriate technical	In some cases, 12 months is more than

	1. Section	2. COUNTRY	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
	activities prior to establishment				considerations.”	enough time; in other cases (e.g. univoltine/temperate species of flies) 12 months may not be adequate. The amount of time will vary and should be based on technical considerations.
28.	2.1.3 Surveillance activities prior to establishment	Australia	Editorial	para	Prior to the establishment of an FF-ALPP, surveillance to assess the presence and level of prevalence of the target fruit fly species should be undertaken for a period determined by its biology, behaviour, climatic characteristics of the area, host availability and appropriate substantive considerations. This surveillance should continue for at least 12 consecutive months.	Clarification of the establishment surveillance requirement.
29.	2.2.1 Surveillance activities	USA	Technical	2 nd paragraph 3 rd paragraph	Delete “ <u>The NPPO may complement trapping for adults with fruit sampling for larvae for fruit fly surveillance and/or monitoring. Fruit sampling may be especially useful for surveillance for fruit flies when no traps are available. If larvae are detected in fruit sampling, it may be necessary to rear the larvae to adults in order to identify them. This is the case particularly if multiple species of fruit flies may be present.</u> Surveillance procedures may include those described in section 2.2.2.2 on fruit sampling procedures of ISPM No, 26 (<i>Establishment of pest free areas for fruit flies (Tephritidae)</i>)	Fruit sampling is sometimes the only surveillance method for species where lures or other adult traps are not available. In addition, in some cases, larvae may be present at certain times of the year (overwintering in fruit) when adults are not present or will not be active to be trapped.
30.	2.2.1 Surveillance activities	Japan	Substantive	Para. 3	The NPPO may complement trapping with fruit sampling for fruit fly surveillance and/or monitoring.	According to ISPM No. 5, “surveillance” includes “monitoring”.
31.	2.2.1 Surveillance activities	USA	technical	4 th paragraph, 1 st sentence	“The presence and distribution of fruit fly hosts should be recorded separately identifying commercial and non-commercial hosts.”	The use of terms like “primary” and “secondary” hosts is not really accurate. It is confusing. More useful to refer to “host”, “non-host”, “preferred host”.
32.	2.2.2 Reduction and maintenance of target fruit fly species population level	Australia	Substantive	Para 1	Suppression of fruit fly populations may involve the use of more than one control option; some of these are described in section 3.1.4.2 of ISPM No. 22 (<i>Requirements for the establishment of areas of low pest prevalence</i>) and Annex 1 of ISPM No 26 (<i>Establishment of pest free areas for fruit flies (Tephritidae)</i>).	

	1. Section	2. COUNTRY	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
33.	2.2.2 Reduction and maintenance of target fruit fly species population level	Australia	Substantive	Para 3	Since the target fruit fly species are either endemic or established in the area, preventive and/or sustainable control measures	Aren't sustainable measures also preventative – suggest delete
34.	2.2.2 Reduction and maintenance of target fruit fly species population level	Australia	Substantive	Para 3	Available methods include: Add – controls on commercial produce for retail sale	Another method to consider.
35.	2.2.3 Phytosanitary measures related to movement of host material or regulated articles	Australia	Substantive	Para 1 sentence 2	These are outlined in section 3.1.4.3 of ISPM No. 22 (<i>Requirements for the establishment of areas of low pest prevalence</i>) and 2.2.3 of ISPM No 26 (<i>Establishment of pest free areas for fruit flies (Tephritidae)</i>).	
36.	2.2.4 Domestic declaration of an FF-ALPP	USA	technical	2 nd paragraph	To verify the status of the FF-ALPP and for purposes of internal management, the continuing FF-ALPP status should be verified <u>after</u> it has been established....	Suggest to state how often?
37.	2.3 Maintenance of the FF-ALPP	Australia	Editorial	Para 1	Once the FF-ALPP is established, the NPPO should maintain the relevant documentation and verification procedures (auditable), and continue the application of phytosanitary procedures as described in section 2.2 of this standard.	
38.	2.3.1 Surveillance	Australia	Substantive	Whole section	2.3.1 — Surveillance In order to maintain the FF-ALPP status, the NPPO should continue surveillance, as described in section 2.2.1 of this standard.	This is probably superfluous as its covered by proceeding point. Suggest delete
39.	2.3.2 Measures to maintain low prevalence levels of target fruit fly species	Australia	Editorial	Para 2	If the monitored fruit fly prevalence level is observed to be increasing (but remains below the specified level for the area), a threshold established set by the NPPO for the application of additional control measures may be reached. At this point the NPPO may require implementation of additional control such measures (e.g. as described in section 3.1.4.2 of ISPM No. 22: <i>Requirements for the establishment of areas of low pest prevalence</i>). This threshold should be set to provide adequate warning of potentially exceeding the specified level of low pest prevalence and avert suspension and implementation of corrective action plans.	

	1. Section	2. COUNTRY	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
40.	2.5 Suspension, reinstatement and loss of FF-ALPP status	Australia	Substantive	New para	Suspension, reinstatement and loss of FF-ALPP status does not apply to FF-ALPPs that are buffer zones to FF-PFAs, fruit fly free places of production or fruit fly free production sites as failure to adequately operate a buffer zone may jeopardise the phytosanitary integrity of the protected areas.	
41.	2.5.1 Suspension of FF-ALPP status	USA	editorial	3 rd paragraph	“Suspension of the program based on ALPP may also apply if faults in the procedures or their application...”	
42.	2.5.1 Suspension of FF-ALPP status	Bolivia, Brazil, Chile, COSAVE, Paraguay, Argentina, Uruguay	Substantial	3 rd para	Suspension may also apply if faults in the <u>application of the procedures or their application</u> are found (for example, inadequate trapping or pest control measures or inadequate documentation).	Procedures have already been agreed among NPPO's during the previous recognition process. At this stage, it is an issue of how the agreed procedures are applied.
43.	2.5.1 Suspension of FF-ALPP status	Japan	Editorial	Para. 3	Suspension may also apply if faults in the procedures or their application are found (for example, inadequate trapping, or pest control measures or inadequate documentation).	
44.	2.5.2 Reinstatement of FF-ALPP status	USA	technical	End of first indent 2 nd paragraph	“...environmental conditions; <u>and/or</u> “Once the specified level of low prevalence has been achieved and maintained as required above <u>and</u> procedural faults, <u>if any</u>, have been rectified through the application...	Both conditions may apply before reinstatement takes place
45.	2.5.2 Reinstatement of FF-ALPP status	Australia	substantive	Para 2	as required above or procedural faults have been rectified through the application of corrective actions contained in the plan	Procedural faults are not covered in the plan.
46.	2.5.2 Reinstatement of FF-ALPP status	Bolivia, Brazil, Chile, COSAVE, Paraguay, Argentina, Uruguay	Substantial	2 nd para,	Once the specified level of low prevalence has been achieved and maintained as required above or procedural faults have been rectified through the application of corrective actions contained in the plan, the FF-ALPP status can be reinstated. If the FF-ALPP is established for export of host fruits, the reinstatement may be subject to <u>verification</u> recognition by the relevant importing country(ies). This recognition of reinstatement should be carried out without undue delay by the NPPO of the importing country.	ISPM No. 29 states that verification can be used for this situation and not necessarily the full recognition process has to be reinitiated. The reinstatement implies the application of a corrective action plan and the effect of those actions must be verified and not necessarily a full recognition process has to be re initiated. If not, there is no difference between suspension and lost.
47.	2.5.3 Loss of FF-	Japan	Substantive	Para. 1	Loss of FF-ALPP status should occur after suspension	A time frame should not be determined by

	1. Section	2. COUNTRY	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
	ALPP status				if reinstatement has failed to take place within an acceptable <u>justifiable</u> time frame <u>taking into account the biology of the fruit fly target species.</u>	acceptability but by scientific justification.
48.	Annex 1 Parameters used to estimate the level of fruit fly prevalence	USA	Technical	Para 5, sentence 2	“...relating to <u>each</u> host of the fruit fly species...”	The use of terms like “primary” and “secondary” hosts is not really accurate. It is confusing. More useful to refer to “host”, “non-host”, “preferred host”.
49.	Annex 1 Parameters used to estimate the level of fruit fly prevalence	USA	Technical	Para 5, sentence 3	“...only one type of host, consideration should be given to the level of infestation expected in the host.”	Consistent with previous comments regarding “primary” and “secondary” hosts.
50.	Annex 1 Parameters used to estimate the level of fruit fly prevalence	Australia	Substantive	Para 5 new last sentence	Any subsequent change to the host assemblage of the area should initiate a review of the FTD value for the FF-ALPP.	
51.	Annex 1 Parameters used to estimate the level of fruit fly prevalence	USA	Technical	Add new 6 th paragraph	<u>“For an exported commodity, the specified level should be related to the likelihood of introduction into the importing country and the other measures being employed to manage risk. For a buffer area for a PFA, the level should be based on the ability to maintain the PFA.”</u>	
52.	Annex 1 Parameters used to estimate the level of fruit fly prevalence	Australia	Editorial	Para 8 sentence 1	specified level of low pest prevalence is established determined for the new formulation.	
53.	Annex 1 Parameters used to estimate the level of fruit fly prevalence	USA	Technical	Para 9	“Once a specified level of low pest prevalence has been established for a given situation using a specific lure/attractant <u>or other parameters</u>. The lure/attractant used....”	Other parameters could include monitoring and frequency.
54.	Annex 1 Parameters used to estimate the level of fruit fly prevalence	USA	Technical	Last para	“Fruit sampling can be used as a surveillance method to assess the profile of the fruit fly population levels, <u>particularly if traps are not available for target species. Fruit sampling should be done on known hosts. It should be taken into account that efficacy of fruit sampling depends on sample size, frequency and timing. Fruit sampling may include rearing larvae to identify the fruit fly species. If fruit cutting is done, the efficacy of visually detecting larvae should be calculated.</u>	

	1. Section	2. COUNTRY	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
55.	Annex 2 Guidelines on corrective action plans for fruit flies in an FF-ALPP	Australia	substantive	Para 1, sentence 1	Faults in the procedures or their application (eg inadequate trapping or pest control measures, inadequate documentation, or t he detection of a population level	
56.	Annex 2 Guidelines on corrective action plans for fruit flies in an FF-ALPP	Australia	substantive	Para 1 sentence 2	The objective of the corrective action plan is to ensure procedures and their applications are adequate and suppression of the fruit fly population to below the specified level for low pest prevalence is achieved as soon as possible	
57.	Annex 2 Guidelines on corrective action plans for fruit flies in an FF-ALPP	Australia	substantive	Para 3, new 1 st dash point	- revision and rectification of operational procedures, or	
58.	Annex 2 Guidelines on corrective action plans for fruit flies in an FF-ALPP	Australia	substantive	Para 3, new dash point	- range of control measures available eg pesticides	Should also refer to range of control measures available (eg. for pesticides, which products) and possibility also to the factors constraining the use of some control measures eg. pesticide registrations
59.	Annex 2 Guidelines on corrective action plans for fruit flies in an FF-ALPP	Australia	substantive	Application of corrective action plan 1. Notice to implement corrective actions	Insert new 2nd sentence Notification should include the reason for initiating the plan ie faulty procedures or exceeding the specified level of low pest prevalence	
60.	Annex 2 Guidelines on corrective action plans for fruit flies in an FF-ALPP	EC, EPPO	Substantive	4 th paragraph	Remove “, or an NPPO-nominated agency”	The draft ISPM is addressed only to the NPPO, so reference to an NPPO-nominated agency is unnecessary..
61.	Annex 2 Guidelines on corrective action plans for fruit flies in an FF-ALPP	Rep. Korea	editorial	1. [para 4]	1. <u>Notice to implement corrective actions</u> The NPPO notifies interested stakeholders and parties, including relevant importing countries, when initiating the application of a corrective action plan. The NPPO is responsible for supervising the implementation of corrective measures.	Delete ‘NPPO nominate agency’; only NPPO is responsible for supervising
62.	Annex 2 Guidelines on corrective action plans for fruit flies in an FF-ALPP	Australia	substantive	Application of corrective action plan 3. Suspension of FF-ALPP status	If the specified level of low pest prevalence of the target fruit fly species is exceeded or faulty procedures are found , the FF-ALPP status should be suspended as stated in section 2.5.1	
63.	Annex 2 Guidelines on corrective action	USA	technical	2. Determination of the phytosanitary	“...delimiting survey (which may include the deployment of additional traps, fruit sampling of	Consistent with previous comments regarding “primary” and “secondary” hosts.

	1. Section	2. COUNTRY	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
	plans for fruit flies in an FF-ALPP			status, 2 nd line	host fruits and increased trap inspection frequency)....	
64.	Annex 2 Guidelines on corrective action plans for fruit flies in an FF-ALPP	Australia	substantive	Application of corrective action plan	New section 4 <u>Rectifying procedural faults</u> Faulty procedures and associated documentation should be immediately reviewed to identify the source of the fault(s). The source and remedial action taken should be documented and the modified procedures monitored to ensure compliance with the objectives of the FF-ALPP.	
65.	Annex 2 Guidelines on corrective action plans for fruit flies in an FF-ALPP	USA	technical	4. Implementation of control measures in the affected area, 5 th indent	“ – stripping and destruction of host fruits, if possible”	Same as above [Consistent with previous comments regarding “primary” and “secondary” hosts.]
66.	Annex 2 Guidelines on corrective action plans for fruit flies in an FF-ALPP	Rep. Korea	editorial	4. 4 th dashpoint	- collection and destruction of affected fruits	accuracy
67.	Annex 2 Guidelines on corrective action plans for fruit flies in an FF-ALPP	Australia	substantive	Application of corrective action plan 4 Implementation of control measures in the affected areas – new dash point	- removal or replacement of host plants	Should add removal or replacement of host plants
68.	Appendix 1 Guidelines on trapping procedures	USA	technical		Remove this appendix	This should be included as a reference at the beginning of the standard but should not be attached as an appendix. Some of the information is dated; newer information in some cases is available.
69.	Appendix 2 Typical applications of FF-ALPPs	Australia	editorial	Heading	TYPICAL APPLICATIONS OF AN FF-ALPPs	delete ‘s’ from ALPPS
70.	Appendix 2 Typical applications of FF-ALPPs 1. An FF-ALPP as a buffer zone	Australia	editorial	Para 1, sentence 2	These FF-ALPPs are usually established at the same time as establishing the FF-PFA and may subsequently be redefined to improve protection of the FF-PFA. Establishment of the FF-ALPP and FF-PFA should occur at the same time, enabling the FF-ALPP to be defined for the purpose of protecting the FF-PFA.	

	1. Section	2. COUNTRY	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
71.	Appendix 2 Typical applications of FF-ALPPs 1. An FF-ALPP as a buffer zone	Australia	Substantive	para 1, sentence 2	...and may subsequently be redefined to improve protection of the FF-PFA- and have features similar to the area or place of production it protects.	This condition of a buffer zone should be stated at the outset, not alluded to subsequently (as in section 1.3)
72.	Appendix 2 1.1 Determination of an FF-ALPP as a buffer zone	Australia	Editorial	Sentence 1	Determination procedures may include draw upon those ...	I don't like "may include" in the standard. If there are more known options these should have been listed. If not "may include" is wordy. Delete "may" as an alternative to that suggested in Col 5.
73.	Appendix 2 1.1 Determination of an FF-ALPP as a buffer zone	Australia	Editorial	Sentence 1	Determination procedures may include those listed in section 1.2 of this ISPM standard.	
74.	Appendix 2 1.1 Determination of an FF-ALPP as a buffer zone	Australia	Editorial	Sentence 3	...sea, as well as these other areas that function as natural barriers	
75.	Appendix 2 1.2 Establishment of ...	Australia	Editorial	End of sentence 1	...procedures are described in section 2.1 of this standard.	Clarity. Consistency with description in 1.1.
76.	Appendix 2 1.3 Maintenance of ...	Australia	Editorial	Sentence 1	Maintenance p Procedures include those listed in section 2.3 of this standard.	Clarity. Consistency with description in 1.1..
77.	Appendix 2 Typical applications of FF-ALPPs 2. FF-ALPPs for export purposes	USA	technical	2. FF-ALPPs for export purposes, 2 nd indent	"- production of <u>hosts that support low levels of infestation</u>"	Consistent with previous comments regarding "primary" and "secondary" hosts.
78.	Appendix 2 2.1 Determination of an FF-ALPP for export purposes	Australia	Editorial	Sentence 1	include those listed in section 1.2 of this standard	Consistency
79.	Appendix 2 2.1 Determination of an FF-ALPP for export purposes	Australia	Editorial	Sentence 1	include those listed in section 2.3.2 of this standard	Consistency