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para la
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Alimentación

COMMISSION ON PHYTOSANITARY MEASURES

Third Session

Rome, 7 - 11 April 2008

Comments on draft standards (CPM 2008/2 - Annex 4) Replacement or reduction of methyl bromide as a phytosanitary measure

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 replacement or reduction of methyl bromide as a phytosanitary measure from the following members and RPPOs:

- Australia
- Canada
- EC and its Member States
- EPPO
- Japan
- Norway
- Republic of Korea
- USA

2. For that draft ISPM, see also documents: CPM 2008/INF/10/Rev.1 and CPM 2008/INF/21.

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DRAFT ISPM: REPLACEMENT OR REDUCTION OF METHYL BROMIDE AS A PHYTOSANITARY MEASURE

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. This document is provided for information and the final version will be distributed at the CPM-3 meeting.

	1. Section	2. COUNTRY	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
1.	GENERAL COMMENTS	Australia			ISPM 5 states that a standard is a <i>Document established by consensus and approved by a recognized body, that provides, for common <u>and repeated use</u>, rules, guidelines or characteristics for activities or their results, aimed at the achievement of the optimum degree of order in a given context</i> (emphasis added). This draft is not a document for repeated use but a policy document and should be redrafted as such. Section 5 offers Guidelines for Appropriate Use of Methyl Bromide as a Phytosanitary Measure – elements listed may provide topics for standards in their own right if expanded and developed further. As a list they provide suggestions only and do not constitute significant guidance to members nor reduce potential methyl bromide use. Whilst there is no proforma for a policy document, policy decisions have been taken in the past and reported in the report of the CPM/ICPM. There needs to be clear identification as to the responsibilities of the IPPC against those of the Montreal Protocol. The latter should work with the IPPC to have a joint program that clearly defines respective roles and responsibilities as afforded by each treaty. Signatories to the Montreal Protocol are obligated to reduce use of ozone depleting gases. IPPC helps members reduce the spread of plant pests within an environment of reduced use of methyl bromide and ozone depleting alternatives. The majority of IPPC parties are already bound to meet Montreal Protocol obligations and the IPPC document should facilitate and provide guidance on phytosanitary measures. A draft standard could be developed that had a scope to provide ‘how to’ guidance to members to do reduce MB use rather than a policy statement that states what they should do. Comments on the text of the draft standard are provided below	
2.	GENERAL COMMENTS	Japan	General comments		The draft text does not provide specific requirements for phytosanitary measures to which they should be internationally harmonized. Without such requirements, we can not evaluate whether phytosanitary measures taken by a country conform to international standards or not. So we believe that the draft does not seem to be qualified as an international standard. Taking into also account that “recommendation” would have the same effect as “international standard” in terms of legal implication under the SPS Agreement, Japan believes that this draft text should be adopted as a “CPM policy” or “strategic plan”, not as an “international standard” or “recommendation”.	
3.	GENERAL COMMENTS	Rep. Korea	Substantive		It was felt that the document was a policy document rather than a standard.	
4.	GENERAL COMMENTS	Australia			Wood packaging alternative treatments need to be included in ISPM 15 to encourage uptake. Whilst this is mentioned in the draft the sooner this information is made available the sooner alternatives can be introduced into global commerce. It would be preferable to bring industry along as alternatives are agreed. The availability and cost associated with some of the alternatives will impact on uptake.	
5.	GENERAL COMMENTS	Australia			The alternative options for methyl bromide are not readily accepted by Australia's trade partners. This may have significant impact on reducing the use of MeBr and necessitate continued use if alternatives are not accepted. The	

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					Technical Panel on Phytosanitary Treatments is already charged with developing treatment annexes that provide alternatives to methyl bromide as a priority	
6.	GENERAL COMMENTS	Australia		Scope, Outline of requirements,	The guidelines should make clear the links with the Montreal Protocol and give greater weight of NPO and NOU collaborating See below	It is likely that contracting parties to the IPPC will be Parties to the Montreal Protocol. Links should therefore be established to ensure that practitioners using this guideline and those dealing with methyl bromide issues under the Montreal Protocol continue to seek a common national policy approach to alternatives. Also, this guideline is not a mandatory measure while mandatory measures may already exist for those contracting parties who are also Parties to the Montreal Protocol (eg reporting requirements on usage under the Protocol, even for QPS use). Methyl bromide remains a controlled substance under the Protocol despite the exemption for QPS use in Article 2H.
7.	SPECIFIC COMMENTS	Australia		Table of alternatives	The list of alternatives is too limited – needs a wider scope. Australia has developed a database of alternatives and can discuss with the Secretariat making this available through the IPP	
8.	TITLE OF THE DRAFT	Australia	Substantive	Title	Replacement or reduction of methyl bromide as a phytosanitary measure for quarantine pre-shipment	Is IPPC limiting to QPS as critical use exception already regulated by the Montreal Protocol?
9.	TITLE OF THE DRAFT	European Commission and its member states (hereafter “EC”), EPPO	Editorial/Technical	Add additional wording in the middle	REPLACEMENT OR REDUCTION OF THE USE OF METHYL BROMIDE AS A PHYTOSANITARY MEASURE	Linguistically more precise
10.	SCOPE	Australia	Substantive	Sentence 1 and <u>footnote 1</u>	This standard provides guidance to National Plant Protection Organizations (NPPOs) on the replacement of or reduction in the use of methyl bromide as a phytosanitary measure in order to reduce emissions of methyl bromide. <u>The Montreal Protocol on Substances that Deplete the Ozone Layer controls the use of methyl bromide and nothing in this standard shall affect the rights or obligations of contracting parties under this, or other applicable, international agreements. Nevertheless, practitioners using this guideline and those dealing with methyl bromide issues under the Montreal Protocol should continue to seek a</u>	Text should more clearly establish the link with the Montreal Protocol – a footnote does not provide sufficient weight and this wording should be incorporated into the text. The scope should make it quite clear that these guidelines should be used as part of a national policy approach, including those requirements under the Montreal Protocol.

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					<u>common national policy approach to methyl bromide alternatives.</u>	
11.	REFERENCES	Australia	Editorial	Reference to ISPM 15	Update publication year to include <u>with modifications to Annex 1 2006</u>	Annex 1 is an important part of ISPM 15 for this standard
12.	OUTLINE OF REQUIREMENTS	Australia	Substantive	Sentence 1		Are there guidelines?
13.	OUTLINE OF REQUIREMENTS	Australia	Substantive	Sentence 3	The standard also provides guidance on monitoring the use of methyl bromide <u>collection of methyl bromide usage data, which is also a requirement under the Montreal Protocol.</u>	The use of “monitoring” may be confused with monitoring methyl bromide levels in a fumigation. Rather, it actually provides guidance on data collection – but misses the link with the Montreal Protocol which already has such a requirement.
14.	OUTLINE OF REQUIREMENTS	Japan	Substantive	Para. 1 last sentence	The standard also provides guidance on monitoring <u>recording</u> the use of methyl bromide.	Guidance is not provided on monitoring but on recording at the section 4 of this draft.
15.	BACKGROUND	EC	Substantial	Para 1 3 rd sentence	Change to: “In its preamble, the IPPC <u>indicates that in agreeing to the Convention, the contracting parties</u> take into account “internationally approved principles governing the protection of <u>plant, human, and animal</u> health and the environment”.	Concise reference to Preamble.
16.	BACKGROUND	EPPO	Substantial	Para 1 3 rd sentence	Change to: ‘In its Preamble, the IPPC states that <u>the Convention has been agreed by</u> contracting parties <u>taking</u> into account internationally approved principles governing the protection of human health and the environment”.	Concise reference to Preamble.
17.	BACKGROUND	Canada	Technical	Para 2 sentence 2	This obliges them to protect the ozone layer by reducing, and ultimately eliminating, emissions of ozone-depleting substances through a phase-out of production, <u>import and consumption</u> of such substances.	The word “consumption” needs to be added to accurately reflect the obligations under the Montreal Protocol. The word “consumption” would include import, export, etc. which are all covered under the obligations of the Montreal Protocol.
18.	BACKGROUND	Australia	Editorial	Para 2 sentence 2	...phase-out of production and import of such substances, <u>noting the QPS exemptions</u>	Accuracy
19.	BACKGROUND	Australia	Editorial	Para 4 sentence 1 & 2	<u>For many decades,</u> methyl bromide has been widely used as a pest control treatment <u>as it</u> for many decades. It offers broad spectrum control for insects, nematodes, weeds, pathogens and rodents.	
20.	BACKGROUND	Australia	Editorial	Para 3 sentence 6	Therefore, parties to the Montreal Protocol already have obligations to monitor and report their use of methyl bromide for QPS applications.	Repetitious
21.	BACKGROUND	Australia	Editorial	Para 4	Weeds	Identify users and outcomes, may help in

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				sentence 1	rodents	identifying alternatives
22.	BACKGROUND	Australia	Editorial	Para 4 sentence 3 & 4	Methyl bromide has been employed primarily as a soil fumigant before planting crops and is also used for commodity treatments and structural fumigation. Most uses of methyl bromide as a phytosanitary measure are for the treatment of durable commodities, in fumigation of structures and for treatment of commodities such as grains, cereals, dried foodstuffs, wood packaging materials, wood and logs, as well as perishable commodities such as fruit.	Smoother word usage
23.	BACKGROUND	Australia	Editorial	Para 6	Insert examples.	Sentence begs the questions ‘Which countries’?, ‘How’?, Have there been any adverse biosecurity implications or particular benefits?
24.	BACKGROUND	Australia	Substantive	Para 6	Some countries have already successfully reduced or eliminated the use of methyl bromide.	Delete para – this does not give any idea of the nature of the reduction or elimination – ie was it trivial or a major programme? Only retain para if more details can be provided.
25.	BACKGROUND	Australia	Substantive	Para 7 sentence 2	In comparison, the United Nations Environment Programme’s Methyl Bromide Technical Options Committee defined alternatives as those non-chemical or chemical treatments and/or procedures that are technically feasible for controlling pests, thus avoiding or replacing the use of methyl bromide. This is similar to the approach taken by the Montreal Protocol when assessing proposals for continued critical use of methyl bromide – for which an alternative to be considered as a practicable alternative, then a link between technological and economic feasibility should be considered. The practicable alternative should also provide a benefit to the protection of the ozone layer.	MBTOC source not quoted. We are not aware of this definition for methyl bromide alternatives and its use here is at odds for alternatives that are considered under critical use exemptions. Certainly, if an alternative was to be considered as a practicable alternative, then a link between technological and economic feasibility should be considered and would match similar language used in decisions by the Parties (eg Decision IV/23, Decision IX/6 and Decision XV/53) which have more weight than advice from MBTOC. We would also note that a practicable alternative should provide a benefit to the protection of the ozone layer.
26.	BACKGROUND	Rep. Korea	Substantive	Para 7 sentence 2	In comparison, the United Nations Environment Programme’s Methyl Bromide Technical Options Committee defined alternatives as those non-chemical or chemical treatments and/or procedures that are technically <u>and economically</u> feasible for controlling pests, thus avoiding or replacing the use of methyl bromide.	Coordinate to Montreal Protocol
27.	REQUIREMENTS	Australia	Substantive	Para 1 sentence	Contracting parties are encouraged to put in place a strategy that will help them to reduce the use of methyl bromide for phytosanitary	This is a policy statement

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					measures and/or reduce emissions of methyl bromide. This may include the following areas for action: - replacing methyl bromide use - reducing methyl bromide use - physically reducing methyl bromide emissions - accurately recording methyl bromide use for phytosanitary measures.	
28.	REQUIREMENTS	Australia	Editorial	Para 1 new point after 2 nd dash point	<u>- ensuring efficient application of methyl bromide through use by trained applicators, thereby reducing necessity for re-fumigations</u>	Important that methyl bromide be used more efficiently as part of the solution to decrease emissions
29.	REQUIREMENTS	Australia	Editorial	Para 1 3 rd dash point	- physically reducing methyl bromide emissions <u>through recapture and destruction technologies</u>	More full explanation
30.	1. Replacement of Methyl Bromide Use as a Phytosanitary Measure	Australia	Editorial	Para 1 sentences 1 & 2	In recognition of the desire to minimize the use of methyl bromide, contracting parties should, where possible, take actions to replace methyl bromide usage by increasing the application of alternative phytosanitary measures <u>for regulated pests</u> . Where methyl bromide fumigation is currently used as a phytosanitary treatment for regulated pests it may be replaced by an alternative phytosanitary measure in which no methyl bromide is used.	The wording of the 2 nd sentence largely repeats what has been said in previous sentence. The 2 nd sentence should therefore either be deleted or amended. This could be achieved by adding 'for regulated pests' at the end of 1 st sentence and then deleting 2 nd sentence.
31.	1. Replacement of Methyl Bromide Use as a Phytosanitary Measure	Australia	Editorial	Para 3, sentence 1	In situations where consignments are identified as non-compliant <u>with respect to importing phytosanitary requirements</u> at the point of import,	Need to clarify being non-compliant with respect to what
32.	1. Replacement of Methyl Bromide Use as a Phytosanitary Measure	Australia	Editorial	Para 3, sentence 1	the use of methyl bromide should be avoided where possible. <u>Re-export or destruction of infested consignments would avoid the need for fumigation, or alternate effective equivalent, that is no ozone depleting may be applied.</u>	Provide options
33.	1. Replacement of Methyl Bromide Use as a Phytosanitary Measure	Australia	Editorial	Para 4	The CPM, largely through the provisions of ISPM No. 28 (<i>Phytosanitary treatments for regulated pests</i>), is actively pursuing recognition of treatments that are viable alternatives to methyl bromide. As these alternatives become recognized, contracting parties are encouraged to use them in place of methyl bromide, where appropriate.	Policy statement
34.	1. Replacement of Methyl Bromide Use as a Phytosanitary Measure	EC, EPPO	Editorial	Para 4, 1 st sentence	Change "recognition " to " <u>adoption</u> "	More precise what CPM is doing

	1. Section	2. COUNTRY	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
	Measure					
35.	1. Replacement of Methyl Bromide Use as a Phytosanitary Measure	Norway	technical	Para 5. last part of sentence	... and others are considered to present less of an adverse environmental impact, parties <u>should endeavour</u> to use the lower-impact option(s).	Text more in line with para 1, sentence 1
36.	1. Replacement of Methyl Bromide Use as a Phytosanitary Measure	Australia	Editorial	Para 5	Where a standard contains options for various treatments for a commodity, and one of the options is methyl bromide (currently the only standard for which this is the case is ISPM No. 15: <i>Guidelines for regulating wood packaging material in international trade</i>) and others are considered to present less of an adverse environmental impact, parties are encouraged to use the lower impact option(s.). Parties/users should be encouraged to apply option(s) with lower environmental impact than methyl bromide, where available.	Current paragraph is too wordy and loses impact as a result.
37.	1. Replacement of Methyl Bromide Use as a Phytosanitary Measure	EC, EPPO	Technical	Para 6	Change “measures” to “ <u>treatments</u> ”	Consistent with appendix, which is primarily on treatments
38.	2. Reducing Volumes of Methyl Bromide Use as a Phytosanitary Measure	Australia	Editorial	Para 1 sentence 1	The reduction of methyl bromide emissions can be achieved through the use of reduced dosages of methyl bromide as a phytosanitary measure or decreased treatment frequency <u>and the efficient application of methyl bromide by trained applicators.</u>	Important that methyl bromide be used more efficiently as part of the solution to decrease emissions
39.	2. Reducing Volumes of Methyl Bromide Use as a Phytosanitary Measure	USA	technical	Para 2, new indent	<u>“- evaluation of pest risk and treatment efficacy (PRA) to determine if a more appropriate dose or alternative treatment is possible.”</u>	PRAs are essential in reducing or replacing the use of MB
40.	2. Reducing Volumes of Methyl Bromide Use as a Phytosanitary Measure	EC, EPPO	Technical	Para 2, 1 st indent	Reword to: “- inspection-based fumigation instead of mandatory fumigation (fumigation should only be used when a quarantine pest has been detected)”	More concise, explaining what meant by inspection-based, cf. similar good wording in 2 nd indent
41.	2. Reducing volumes of methyl bromide use as phytosanitary measure	Rep. Korea	Substantive	Para 2, ¹ dash point 1	- inspection-based fumigation instead of mandatory fumigation, i.e. to detect and identify the <u>regulated</u> pest of concern	include regulated non-quarantine pest

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42.	2. Reducing volumes of methyl bromide use as phytosanitary measure	Rep. Korea	Substantive	Para 2, dash point 2	- avoidance of unjustified refumigation with methyl bromide (i.e. refumigation should be used only when a <u>regulated</u> pest situation is evident)	include regulated non-quarantine pest
43.	2. Reducing Volumes of Methyl Bromide Use as a Phytosanitary Measure	Australia	Editorial	Para 2, dash points 1 & 2		Inconsistent use of brackets
44.	2. Reducing Volumes of Methyl Bromide Use as a Phytosanitary Measure	Australia	Editorial	Para 2, dash point 3	—improvement of treatment facilities as appropriate in order to increase exposure time with a reduction of dosage - <u>Improved treatment facilities that enable a lower dosage by increasing exposure time</u>	Improve clarity
45.	2. Reducing volumes of methyl bromide use as phytosanitary measure	Rep. Korea	Substantive	Insert Dashpoint 4,5,6	- <u>fumigation performance, e.g. by use of bioassay controls in lieu of concentration × time (C×T) products, use of higher temperatures during fumigation through supplemental heat when necessary combined with air circulation, pressure testing etc., reduction of leakage</u> - <u>gas circulation, e.g. by use of a carrier gas such as CO₂</u> - <u>gas and temperature monitoring including proper calibration of equipment.</u>	More appropriate
46.	2. Reducing Volumes of Methyl Bromide Use as a Phytosanitary Measure	Australia	Editorial	Para 2, dash point 6	—reassessment of doses and exposure times in order to reduce them - <u>To reduce methyl bromide dose</u>	Improve clarity
47.	2. Reducing Volumes of Methyl Bromide Use as a Phytosanitary Measure	Australia	Substantive	Para 2, dash point 7	- use of higher temperatures when fumigating	What about Malaysia's concerns that temperatures can be too high to be effective (ISPM 15)
48.	3. Physically Reducing Methyl Bromide Emissions	Australia	Editorial	Para 1, sentence 1	Contracting parties should aim to minimize or eliminate the release of methyl bromide to the atmosphere by physical means. <u>implement physical measures where possible to minimise or eliminate the release of methyl bromide to the atmosphere.</u>	Better words
49.	3. Physically Reducing Methyl Bromide	Australia	Editorial	Para 1, sent 2	This may be achieved by upgrading facilities as appropriate to increase efficiency of methyl bromide application to improve	To ensure that need for change is more strongly emphasised.

	1. Section	2. COUNTRY	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
	Emissions					
50.	3. Physically Reducing Methyl Bromide Emissions	Australia	Editorial	dash point 1	...eg by recapture, and/or reusage reuse or destruction delete 'etc'	Better English 'etc' unnecessary when part of list of examples
51.	3. Physically reducing methyl bromide emissions	Rep. Korea	Substantive	Remove dashpoint 2,3,4,	3. Physically Reducing Methyl Bromide Emissions Contracting parties should aim to minimize or eliminate the release of methyl bromide to the atmosphere by physical means. This may be achieved by upgrading facilities as appropriate to increase efficiency of methyl bromide application to improve: - methyl bromide emissions control, e.g. by recapture, and/or reusage or destruction, through the use of leak-proof chambers and containment/capture bubbles, etc.	See above [move to section 2]
52.	3. Physically Reducing Methyl Bromide Emissions	Japan	Substantive	Para. 1 Indent 2	- fumigation performance, e.g. by use of bioassay controls in lieu of concentration × time (C×T) products , use of higher temperatures during fumigation through supplemental heat when necessary combined with air circulation, pressure testing etc., reduction of leakage	Bioassay controls is not be used generally to improve fumigation performance.
53.	3. Physically Reducing Methyl Bromide Emissions	EC, EPPO	Editorial	2 nd indent	Delete "(CXT)"	This abbreviation is not used anywhere henceforward
54.	4. Recording Methyl Bromide Use as a Phytosanitary Measure	Australia	Editorial	Para 1, sentence 1	To measure monitor progress in reduction of methyl bromide emissions arising from use of methyl bromide	Better word
55.	4. Recording Methyl Bromide Use as a Phytosanitary Measure	Australia	Editorial	Para 2, dash point 2	Insert '·' into list as appropriate in place of ','	Punctuation needs amending to show what part of list are together
56.	4. Recording methyl bromide use as a phytosanitary measure	Rep. Korea	Substantive	Para 2, dash point 2	- description of the articles ¹ fumigated, <u>where appropriate</u>	In most cases, articles in table in Appendix1 is more detail than groups (cereal, wood etc) which many countries report

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57.	4. Recording Methyl Bromide Use as a Phytosanitary Measure	Australia	Editorial	Para 2, dash point 4	- target pests (common name and species)	Important to detail clearly what and why use is needed and this includes clearly distinguishing target organism
58.	5. Guidelines for Appropriate Use of Methyl Bromide as a Phytosanitary Measure	EC	Technical	First sentence	Change “could” to “are encouraged to”	Consistency with Article 4 first para. To avoid using “could” in line with CPM 2008/17.
59.	5. Guidelines for Appropriate Use of Methyl Bromide as a Phytosanitary Measure	USA	Technical	Add a new number	<u>“Evaluate or re-evaluate pest risk (via PRA) to determine if the treatment prescription is appropriate and whether less rigorous treatment or alternative measures may be used.”</u>	In the case of treatments prescribed as a condition of entry, the use of MB is often not linked to a PRA or efficacy studies for a particular pest, commodity, or origin situation but rather based on worst-case assumptions and bilateral agreements designed to facilitate market access based on a rigorous, broadly effective treatment. We feel that the use of PRA is an essential part of reducing or replacing the use of MB. In the absence of other single treatment alternatives, the assessment of risk leading to improved risk management decisions is critical. Likewise, employing systems approaches will become more important if we are to get away from single treatment strategies.
60.	5. Guidelines for Appropriate Use of Methyl Bromide as a Phytosanitary Measure	Japan	Editorial	Point 1	1. Review and consider how to change phytosanitary policies (e.g. phytosanitary import requirements) to reduce replace and/or replace reduce methyl bromide where it is required and where an equivalent, practically viable and economically feasible alternative exists. This may also require review and revision of bilateral agreements between countries.	In line with the other descriptions in this draft.
61.	5. Guidelines for appropriated use of methyl bromide as phytosanitary measures	Rep. Korea	Editorial	Point 1	1. Review and consider how to change phytosanitary policies (e.g. phytosanitary import requirements) to replace and/or reduce methyl bromide where it is required and where an equivalent, practically viable and economically feasible alternative exists.	Accuracy No need to mention bilateral agreement
62.	5. Guidelines for Appropriate Use of	Australia	Editorial	point 1. Sentence 1	Review and consider how to change phytosanitary policies (e.g. phytosanitary import requirements) to reduce and/or replace methyl	To highlight all of the key factors involved in making this decision

	1. Section	2. COUNTRY	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
	Methyl Bromide as a Phytosanitary Measure				bromide where it is required and where an equivalent, practically viable and economically feasible alternative exists. <u>technically feasible, practical and economically viable alternative exists.</u>	
63.	5. Guidelines for Appropriate Use of Methyl Bromide as a Phytosanitary Measure	Australia	Editorial	point 4	1. -4. Develop, implement and utilise phytosanitary measures that are equivalent, viable and feasible alternatives to methyl bromide.	Shift to 1 st point due to its importance.
64.	5. Guidelines for Appropriate Use of Methyl Bromide as a Phytosanitary Measure	Australia	Editorial	Point 6.	Use either “effective” or “efficacious”, not both	Why two words essentially meaning the same thing?
65.	5. Guidelines for Appropriate Use of Methyl Bromide as a Phytosanitary Measure	Australia	Substantive	Point 9	<u>Coordinate with the National Ozone Unit, as appropriate, to</u> f Facilitate the annual collection and reporting of methyl bromide usage data.	This may conflict with mechanisms existing for MP requirements – interaction with NOU should be raised higher
66.	5. Guidelines for Appropriate Use of Methyl Bromide as a Phytosanitary Measure	Australia	Substantive	Point 9	Facilitate the annual collection and reporting of methyl bromide usage data.	Isn't this the role of the ozone office in each country?
67.	5. Guidelines for Appropriate Use of Methyl Bromide as a Phytosanitary Measure	Australia	Substantive	Point 10		But what about ISPM 28 and TPPT? This point seems to avoid the agreed ‘recognition’/‘assessment’ process ie TPPT to SC to member consultation to CPM
68.	5. Guidelines for Appropriate Use of Methyl Bromide as a Phytosanitary Measure	Australia	Substantive	Point 11	44 1	Raise point 11 to point 1 See “General Comments”
69.	5. Guidelines for Appropriate Use of Methyl Bromide as a Phytosanitary Measure	Australia	Substantive	point 13	Identify current treatments where methyl bromide is the only option, and provide sufficient information to the IPPC Secretariat for consideration-in the development of potential viable alternatives (e.g. identify the commodity, pests associated with it for which methyl bromide is used, required efficacy)	Is this the role of the IPPC Secretariat?
70.	5. Guidelines for	Australia	Editorial	point 13	Identify current treatments where methyl bromide is the only option,	To clarify

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	Appropriate Use of Methyl Bromide as a Phytosanitary Measure				and provide sufficient information to the IPPC Secretariat for consideration in the development of potential viable alternatives (e.g. identify the commodity, pests associated with it for which methyl bromide is used, required efficacy). <u>of development of potential viable alternatives (e.g. identify the commodity, pests associated with it for which methyl bromide is used and necessary and the efficacy required to fulfil the phytosanitary requirement.</u>	
71.	APPENDIX 1 Examples of potential phytosanitary treatments to replace or reduce methyl bromide	USA	Technical	Title	Examples of Potential Phytosanitary <u>Measures</u> to Replace or Reduce MB	The examples given on the table include “phytosanitary systems approach (PRA, PFA, ALPP, etc.) which are not considered treatments.
72.	APPENDIX 1 Examples of potential phytosanitary treatments to replace or reduce methyl bromide	USA	Technical	Para 1	“Listed in the table below are <u>measures</u> that could be considered and validated as alternatives to MB and that currently registered, where necessary, and used in at least one country. The <u>measures</u> may be employed...	The examples given on the table include “phytosanitary systems approach (PRA, PFA, ALPP, etc.) which are not considered treatments.
73.	APPENDIX 1 Examples of potential phytosanitary treatments to replace or reduce methyl bromide	EC, EPPO	Substantial	Para 1, new last sentence	Add following sentence: “Other Phytosanitary measures could be considered including PFA, ALPP and systems approach as alternatives for some of the treatments listed below.”	The list concerns treatments and PFA, ALPP and system approach should be mentioned separately as an alternative Phytosanitary measure.
74.	APPENDIX 1 Examples of potential phytosanitary treatments to replace or reduce methyl bromide	Australia	Editorial	Para 2, dash point 1	...of crop types (flowers...	Plural required
75.	APPENDIX 1 Examples of potential phytosanitary treatments to	EC, EPPO	Technical	Para 2, indent 3	Change; “preclude” to “ <u>affect</u> ”.	The current statement does not reflect the basic idea of this ISPM, that obstacles to reducing MB could be removed actively. Thus for example, economic factors could be amended, such that preclusion is

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	replace or reduce methyl bromide					avoided. Actually, economic factors could also enhance the choice of a particular measure, such that in any case the current text is too restricted.
76.	APPENDIX 1 Examples of potential phytosanitary treatments to replace or reduce methyl bromide	Canada	Technical	2 nd paragraph, 6 th indent	- irradiation (often used only on specific life stages for sterility, not for eradication)	The qualifying statement in brackets is incorrect, incomplete and should be removed.
77.	APPENDIX 1 Examples of potential phytosanitary treatments to replace or reduce methyl bromide	USA	technical	Para 2, indent 6	<u>“- Irradiation (it may not kill immature stages but it rather inhibits development to maturity).”</u>	Irradiation as a post-harvest treatment, inhibits development and emergence of adult stages. It does not sterilize.
78.	APPENDIX 1 Examples of potential phytosanitary treatments to replace or reduce methyl bromide	USA	technical	Table, title, column on right	Examples of potential phytosanitary <u>measures</u> to consider to replace or reduce MB	The examples given on the table include “phytosanitary systems approach (PRA, PFA, ALPP, etc.) which are not considered treatments.
79.	APPENDIX 1 Examples of potential phytosanitary treatments to replace or reduce methyl bromide	Australia	Editorial	Table	Carbon dioxide, CO₂ Controlled atmosphere (CO₂, N₂)	Inconsistent use of formulae/words. Carbon dioxide should be spelt out at all mentions. Controlled atmosphere (CO ₂ , N ₂) should be given at all mentions if given at next mention
80.	APPENDIX 1 Examples of potential phytosanitary treatments to replace or reduce methyl bromide	Australia	Editorial	Table, row 1 right column	...combination of these treatments	What are these treatments?
81.	APPENDIX 1	Australia	Substantive	Table, row 3	Reference to hydrogen cyanide	Is it appropriate to list as an alternative a

	1. Section	2. COUNTRY	3. Type of comment	4. Location	5. Proposed rewording	6. Explanation
	Examples of potential phytosanitary treatments to replace or reduce methyl bromide					chemical such as hydrogen cyanide that is equally (or more) damaging to environmental health than methyl bromide?
82.	APPENDIX 1 Examples of potential phytosanitary treatments to replace or reduce methyl bromide	EC, EPPO	Substantive	Table, right hand column including headings, rows 5, 8, 10 and 15	Delete “systems approach (PRA, PFA, ALPP etc.)’	PFA, ALPP and systems approach are alternative Phytosanitary measures but can not be included in list of treatments, whilst PRA seems out of place
83.	APPENDIX 1 Examples of potential phytosanitary treatments to replace or reduce methyl bromide	EC, EPPO	Substantive	Table, right hand column including headings, 12 th row "Wood (including round wood, sawn wood, wood chips)"	Insert after”...sulfuryl fluoride, <u>removal of bark</u> ”	An important example to be included in the list
84.	APPENDIX 1 Examples of potential phytosanitary treatments to replace or reduce methyl bromide	USA	technical	Table, Wood (including round wood, sawn wood, wood chips), right column, add at the end of sentence	<u>“...phosphine, sulfuryl fluoride, bark removal, kiln drying”</u>	