



# **Better Training for Safer Food** *Initiative*

*International Standard-Setting Bodies - IPPC*

**Types and examples of IPPC  
comments**  
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Consumers, Health,  
Agriculture and Food  
Executive Agency

**May 2015**

# Types of IPPC comments

There are four types of IPPC comments:

**SUBSTANTIVE**

**TECHNICAL**

**EDITORIAL**

**TRANSLATION**

# Types of IPPC comments

Comments may be **GENERAL** or **SPECIFIC**

**General** comments do not relate to any particular part of the draft ISPM.

They relate to concerns that are valid throughout the text of the draft ISPM.

They usually call for an overall change in/of the draft ISPM.

**Specific** comments relate to (suggest to modify) a particular part of the draft – a section, paragraph, a sentence, a word or a character.

In specific comments text proposed to be deleted should be ~~crossed-out~~, text to be added should be underlined.

# Types of IPPC comments

## **SUBSTANTIVE** comments

This type of comment takes into account conceptual changes and the addition of new aspects or ideas.

This class of comments contains additions or extensions as well as changes, reorganization of the text or deletions resulting in alteration of the content of a sentence /paragraph /section of the draft.

It is that this point is addressed in the revision process in some way.

# Types of IPPC comments

## SUBSTANTIVE comments – example 1

**Proposal (general)/Explanation:** “The draft ISPM provides useful guidance for developing phytosanitary measures but does not provide any particular requirements as expected for an ISPM. Therefore the usefulness of this document as an international standard is questioned. The pest risks related to wood commodities section is information not a procedure and could be placed in an appendix or elsewhere.”

# Types of IPPC comments

## SUBSTANTIVE comments – example 2

**Proposal (general)/Explanation:** “Determination needs to be made on whether the draft ISPM for handicrafts will be an annex to this document or a standalone document. This ISPM will need to be modified based on that decision. For example, the scope for this standard does not include bamboo, and many handicrafts are made from bamboo. Therefore, if the handicrafts standard is annexed to this document, the scope for this standard should include bamboo.”

# Types of IPPC comments

## SUBSTANTIVE comments – example 3

**Proposal (specific):** “Wood as a commodity class includes round wood, sawn wood, and wood chips, all with or without bark. This standard also covers residual products from the mechanical processing of wood (chips, such as sawdust and wood residue), and processed wood material (e.g. plywood, pellets, oriented strand board, flakeboard and fibreboard), all with or without bark.”

**Explanation:** “Chips should not be categorized as residual products. The word 'purely' stresses that no other factors are involved. Flakeboard is another good example of processed wood material.”

# Types of IPPC comments

## SUBSTANTIVE comments – **example 4**

**Proposal (specific):** “Pest risk varies among different wood commodities – round wood, sawn wood, mechanically processed wood and ~~processed wood material~~ – depending on the level of processing that the wood has undergone and the presence or absence of bark. This standard describes the general pest risk profile for each commodity by indicating the major pest groups associated with each one.”

**Explanation:** The processed wood material should not be in the scope of this standard.



# Types of IPPC comments

## **TECHNICAL** comments

This type of comment takes into account scientific corrections and technical adjustments.

It aims at further clarification and improvement of the standard and sometimes at conformity with other standards from the technical viewpoint.

These comments are incorporated unless there is disagreement or some misunderstanding.

# Types of IPPC comments

## TECHNICAL comments – example 1

**Proposal:** “It is important to note that the phytosanitary measures referred to in this standard should not be required as phytosanitary import requirements without appropriate technical justification. This technical justification should be based on ~~PRA~~ the pest risk ~~(as described in ISPM 2:2007 and ISPM 11:2004)~~, including:”

**Explanation:** “should not always have to go through a formal pest risk analysis process”

# Types of IPPC comments

## TECHNICAL comments – example 2

**Proposal:** ~~“the pest status in the area of origin of the wood”~~

**Explanation:** “It is not necessary to mention this bullet because it is already included in ISPM 2 and 11”

# Types of IPPC comments

## **EDITORIAL** comments

This type of comment clarifies or simplifies the text without changing the meaning.

This includes spelling or grammatical corrections, suggestions of different but equivalent words, and simplification of sentence structure.

# Types of IPPC comments

## EDITORIAL comments – example 1

**Proposal:** “CPM. 2008. *Replacement or reduction of the use of methyl bromide as a phytosanitary measure*~~Replacement or reduction of the use of methyl bromide as a phytosanitary measure~~. IPPC Recommendation. *In Report of the Third Session of the Commission on Phytosanitary Measures. Rome, 7–11 Apr. 2008, Appendix 6. Rome, IPPC, FAO.*”

**Explanation:** The title of the recommendation should be in italics.

# Types of IPPC comments

## EDITORIAL comments – example 2

**Proposal:** "~~It is important to note that the p~~Phytosanitary measures referred to in this standard should not be required as phytosanitary import requirements without appropriate technical justification. ~~This technical justification should be based on PRA (as described in ISPM 2:2007 and ISPM 11:2004), taking into account e.g. including:~~"

**Explanation:** Simplification, more correct wording.

# Types of IPPC comments

## **TRANSLATION** comments

This type of comment corrects points that are considered to be inaccurately translated into another language version of the text.

# Types of IPPC comments

## TRANSLATION comments – example 1

**Proposal:** “Referencias Bibliografía”

**Explanation:** Término apropiado para los proyectos de NIMF (son documentos de referencia de la norma y no bibliografía como en el caso de anexos y apéndices)



# Thank you for your attention





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