



QUESTIONS ON SYSTEMS APPROACH DRAFT DOCUMENT FOR BREAKOUT GROUPS

Note: Questions # 1 and # 2 below will be addressed by all breakout groups.

1. Does this document provide the lay reader with a better understanding of the Systems Approach or its regulatory role? Also, does the document correctly amplify the definition of the Systems Approach as defined by Congress?" If not, how should it be changed?
2. Does the Conclusions section adequately summarize the role application, capabilities of the Systems Approach in mitigation of pathogens? Should a paragraph be added to expand on these areas?
3. Should the International Plant Protection Convention Principles of Plant Quarantine be better integrated into the report as it affects utilization of the Systems Approach?
4. Does the document need to more clearly recognize and include the phytosanitary regulations enabling Systems Approaches currently in use (i.e. - those described in the case studies)?
5. Does the document need to more extensively emphasize the growing role of Systems Approaches in light of the loss of other (single treatment) risk management tools?
6. Does the report adequately assess the success of the Systems Approaches in current use? For instance, would more data on interception per volume of commodity or other measure be helpful in the case studies? If not, how should it be changed?
7. Should the document explain that Systems Approaches are far from "the least restrictive measure(s)," and, if so, should this be explained in the context of the International community's understanding that phytosanitary measures be based on risk? Does the document need to note that, though some disease/host relationships lend themselves to a Systems Approach, the implementation of the Systems Approach to that system must be evaluated using a risk analysis/assessment (i.e. - some risks to U.S. agriculture are too high)?
8. Is there a better example for Table 2 than Mexican Avocado?
9. The Argentine Citrus Case does not emphasize that three pathogens are involved. Should this be done? Should Argentine Citrus be left out of the report?
10. Should Probit 9 security be defined in the Historical Section, where it is first introduced? (Smith)
11. Does the document need to include a stronger statement noting that the "ability, resources and sophistication of the industry and regulatory agency (NPPO) involved" should be factored into the approval process?
12. "How does APHIS' use of systems approaches to guard against the introduction of plant pathogens into the United States fit into the international safeguarding system?" Is the preceding portion of the Team's mandate sufficiently emphasized in the report? If not, how should it be changed?