



**NAPPO**

North American Plant Protection Organization  
Organización Norteamericana de Protección a las Plantas  
**MEXICO - USA - CANADA**

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*DD 09: Criteria for Evaluating Phytosanitary Seed Treatments*

Prepared by the members of the Expert Group on Seeds of the North American Plant Protection Organization (NAPPO), in consultation with additional experts from the NAPPO member countries.

## Criteria for Evaluating Phytosanitary Seed Treatments

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## Criteria for Evaluating Phytosanitary Seed Treatments

The purpose of this project was the **development of a list of criteria for evaluating phytosanitary seed treatments** as well as the identification of data gaps and research needs where they may exist. The document covers the following topics:

- What constitutes an effective treatment;
- When should treatments be applied;
- How would countries agree that a treatment is (or is not) sufficient for managing risk;
- When (or if) verification through testing is justified;
- When (or if) additional testing after a treatment is appropriate;
- Whether seed is an epidemiologically significant pathway (what is the likelihood of pathogen introduction) after treatment; and,
- What impacts do the treatments have on the commodity?

### 1. Background

International Standard for Phytosanitary Measures 28 (ISPM 28 - Phytosanitary treatments for regulated pests) provides general guidance on the development of phytosanitary treatments. However, the standard does not provide any specific guidance on phytosanitary treatments for seeds. Evaluating phytosanitary treatments for seeds may differ from other commodities; therefore, this paper presents additional considerations for evaluating phytosanitary treatments for seeds specifically. The goal of phytosanitary seed treatment research is to subject infected seed to one or more treatments that reduce and/or devitalize the pathogen from the seed pathway. Treatments for seed represent a special case because of the difficulty involved in verifying that treatment efficacy has met the appropriate level of protection identified by the importing country. In some cases, treatments for seeds may affect the vitality of the seed being treated. Depending on the type of diagnostics used to verify treatment efficacy, seed may still test positive for the presence of a pest even if it has undergone an efficacious treatment to inactivate a pest (e.g. serological tests may still detect pathogen proteins or DNA based tests may detect residual DNA after effective

1 treatment). Furthermore, seed treatments – as with most other phytosanitary treatments for other types of  
2 commodities – may not achieve 100% devitalization. The risk associated with the pest, and the appropriate  
3 level of protection of the importing country will inform the necessary level of efficacy of the treatment. A  
4 combination of factors may help to evaluate the reduced risk of a particular seed lot; biology of the pest,  
5 minimum founder rate, efficacy of the seed treatment and acceptable level of risk.

6 **Note:** The scope of this project is focused on both seed borne and transmitted pests. It is understood that  
7 invasive weeds (seeds) can pose a potential phytosanitary risk in the seed pathway, however the criteria and  
8 considerations to mitigate quarantine weeds (seeds) are considerably different than those for seed borne  
9 pests. Therefore, we have not tried to incorporate the criteria for mitigating quarantine weeds (seeds)  
10 throughout this document. Seed certification, inspection and cleaning to remove quarantine weeds and  
11 testing to certify seed lots free from these weed (seeds) are commonly utilized practices to mitigate the  
12 presence of regulated weed (seeds) in seed lots. Seed testing certificates produced by laboratories with  
13 internationally recognized accreditation systems and/or laboratories testing according to internationally  
14 recognized seed testing methods are credible sources to provide evidence of freedom from regulated weed  
15 species. If National Plant Protection Organizations (NPPO) are willing to mutually accept these sources, it  
16 could eliminate the need for testing seed lots for the presence of regulated weed seeds in both the country  
17 of origin and the destination country.

## 18 **2. Types of Treatments**

19 According to the [draft] International Plant Protection Convention (IPPC) standard on International  
20 Movement of Seeds, “seed treatments include, but are not limited to:

- 21 • pesticides (fungicides, insecticides, nematicides and bactericides)
- 22 • disinfectants, generally used against bacteria and viruses; disinfection may take place during  
23 various steps in seed processing (e.g. seed extraction, seed priming) or during a dedicated  
24 disinfection process

- 1 • physical treatments (e.g. dry heat, steam, hot water, irradiation by ultraviolet light, high pressure,  
2 deep-freezing)
- 3 • biological or biochemical treatments based on different modes of action, such as antagonism,  
4 competition and induced resistance.”

5 Appendix 1 includes examples of pesticide, disinfectant and physical treatments. Treatments may be  
6 systemic or contact treatments. A particular treatment may be effective against one or more pathogens, or  
7 two or more treatments may be combined to target one or more pathogens.

### 8 **3. Purpose of Treatments**

9 Treatments for seeds are often applied as protective treatments intended to prevent a soil borne pest from  
10 infesting the growing seedling (e.g. seeds are treated with a fungicide to prevent fungal infection when the  
11 seed sprouts) or remove microbial pests that may be on the surfaces of seeds. For phytosanitary purposes,  
12 a treatment is applied to kill or devitalize a pest that is associated with the seed (either seed borne or seed  
13 transmitted). Additionally, seed biological control treatments may directly (e.g., by antibiotic production  
14 or niche competition) or indirectly (by inducing plant resistance) reduce the risk of pathogen introduction  
15 and epidemic development.

### 16 **4. Developing a Research Protocol for Phytosanitary Seed Treatments**

17 Experimental materials and methods should be described in detail. Research protocols should be submitted  
18 to the NPPO that will be considering the treatment before the research begins. This is to ensure that the  
19 protocol is agreed upon prior to the initiation of research and that the protocol meets requirements of the  
20 importing country. Research completed without a protocol having been reviewed may result in rejection  
21 of the research results.

### 22 **5. Determining Efficacy of Treatments**

23 As with any other phytosanitary treatment, efficacy is demonstrated through small scale testing followed  
24 by large scale confirmatory tests.

### 1 **5.1 Small Scale Tests**

2 Small scale testing or preliminary tests are usually done to determine the best treatment. All treatments are  
3 subject to pesticide regulations and should conform to any specific requirements related to such regulations.  
4 Several doses should be used to determine the optimum treatment. Each treatment rate must be tested in a  
5 replicated fashion (minimum 3 replicates per treatment) with an appropriate negative control to allow for  
6 statistical analysis of the effects of the treatment. If possible, different seed infestation rates should be tested  
7 (e.g. low, medium and high percentages on infested seeds/lot).

8 The researcher should choose the most appropriate detection assay method for the pest and commodity.

9 This will be dependent on the biology of the pathogen and the type of treatment being tested. Multiple  
10 assays can be used if required. The assay should be described in detail. Researchers are also required to  
11 submit all results from the small scale dose-response testing to the NPPO prior to the initiation of  
12 confirmatory trials. This step will ensure that there are no discrepancies between NPPO and the researchers  
13 as to the best treatment.

### 14 **5.2 Large Scale Confirmatory Tests**

15 Large scale confirmatory tests are done to establish statistical confidence in the efficacy of a proposed  
16 treatment. The sample size for the confirmatory testing should be mutually agreed upon by NPPO and  
17 researchers. An example of a specific test size is provided in Appendix 2. Seed pests are diverse and  
18 guidelines for confirmatory test size will be dependent on the pathogen biology, risk of establishment in  
19 environment, and host. Obtaining naturally infected seed in sufficient numbers to conduct statistically  
20 significant tests can be challenging. Where appropriate, spiked seed samples can be used. Additional  
21 information on testing requirements can be found in Appendix 3.

### 22 **5.3 Measuring Efficacy**

23 Researchers should subject data to appropriate statistical analyses, such as probit analysis at the LD50,  
24 LD95, LD99, and probit-9 levels. The type of statistical analysis used to determine the efficacy of the  
25 treatment should be described. Researchers are also encouraged to provide “raw” data in table format.

1 Acceptable measures used for pathogen detections include colony forming units (cfus), often used for  
2 treatments that are considered to be disinfectants. The experimental design for a study should take into  
3 account the need to quantify or measure efficacy, and account for the mode of action of the treatment.

#### 4 **5.4 Determining Effects of the Treatment**

5 Plant pathogenic microorganisms (e.g. fungi, bacteria, viruses, etc.) are the most common type of pest  
6 associated with seed. Because of the biology of these organisms, it may be difficult to assess the effect  
7 (inactivation, devitalization, etc.) and efficacy of a treatment. This may also require an extended growing  
8 period of the planted seed in a growth chamber, greenhouse or small field plots. This is due to the  
9 complexity of the life-cycle of the pathogens which may only produce symptoms on mature plants.

10 In conducting confirmatory tests, researchers should demonstrate that the pest is non-viable (inactivated,  
11 devitalized, etc.) on/in the seed post-treatment. This may be demonstrated through direct detection of the  
12 pathogen, seedling/plant grow-out assays or a combination of pathogen detection and plant grow-out. See  
13 the section below on testing treated seed.

14 Some biological seed treatments do not actually kill or devitalize pests; they are applied as seed coatings  
15 and, once the seed is planted and germinates, these biological agents rapidly colonize the rhizosphere and  
16 developing root systems to limit seed-to-seedling transmission of disease. In these situations, efficacy  
17 could vary depending on environmental conditions and soil microflora. Hence, seed treatment efficacy  
18 may have to be determined by evaluating effects on the resulting plants through plant grow-out studies in  
19 different locations/conditions. In such cases, these issues should be discussed with the NPPO prior to  
20 testing.

#### 21 **6. Feasibility of Treatments**

22 International Standard for Phytosanitary Measures 28 (Phytosanitary treatments for regulated pests)  
23 provides guidance on issues related to feasibility of treatments. For seeds in particular, one special  
24 consideration is the effect of treatments on viability or germination rate of the seed. Treatments that  
25 negatively impact the commodity should be carefully considered before they are used. Information about

1 the impacts of treatments on the following attributes of seed should be included in the outcomes of the  
2 efficacy research as they are an important consideration for the users of seed treatments:

- 3 • Vigor
- 4 • Viability
- 5 • Physical damage
- 6 • Physiological alterations of the seed
- 7 • Promoting seed latency or premature germination
- 8 • Effects on seed storage
- 9 • Shelf-life of the treatment

10 Other aspects of feasibility to consider include cost, practicality of application and accessibility of inputs  
11 (equipment and materials).

12 It should be noted that pesticide treatments used on seeds may need to be registered in both the exporting  
13 and importing countries by the responsible authorities.

## 14 **7. Special Considerations for Research on Phytosanitary Treatments of Seeds**

### 15 **7.1 Testing Treated Seed**

16 During research, it may be necessary to confirm that the treatment has devitalized, killed or otherwise  
17 inactivated the pest. This may be done through an appropriate diagnostic test if the test can indicate that  
18 the pest is devitalized or killed. However, it should be noted that some diagnostic tests may still detect  
19 products of pathogens (e.g. DNA, protein) even if the pathogen has been devitalized or killed. A positive  
20 detection in this case may not indicate viable pathogenic organisms. In some cases, it may be appropriate  
21 to grow out seed under conditions conducive for disease to determine if viable pathogens are still present.

22 To preclude any additional testing of treated seed lots the NPPO(s) could enter into a trade agreement where  
23 both sides have reviewed the treatment research data and agree that it is sufficient to mitigate the  
24 phytosanitary risk. If further testing of treated seed is deemed to be required it would be at the discretion of  
25 the NPPO and should only be done if it is technically justified according to relevant standards (ISPM No.



1 1, 11, 28, etc.). After a treatment has been agreed upon to be used in trade, the NPPO(s) may need to  
2 periodically verify the efficacy of the treatment through testing.

### 3 **8. Sharing Research Protocols and Data among NAPPO NPPOs**

4 All results, including research protocol used, raw data, and statistical analyses, should be shared with the  
5 NPPO. The quality and consistency in data will determine if the research result(s) is (are) accepted. The  
6 NPPO that has approved the treatment should consider providing the details of the treatment to importing  
7 NPPOs for their consideration. If one NAPPO member country approves a treatment that was developed  
8 according to an appropriate research protocol, other NAPPO member countries may want to consider  
9 approving that treatment for their own purposes.

### 10 **9. Knowledge Gaps**

11 Although seed trade has increased dramatically in the last 40 years, the tools available for regulators to  
12 mitigate seed transmitted pests remain limited and is an area that needs further research investment. Many  
13 treatments currently available for phytosanitary purposes are not appropriate for dealing with pathogens in  
14 or on the seed coat of seed being used for propagative purposes as it dramatically decreases seed  
15 germination. Development of additional treatment options for seed borne and seed transmitted pathogens  
16 localized in or on the seed coat or in the endosperm is needed by regulators.

17 Several private industries are investigating various new technologies to treat seed borne pathogens, but the  
18 treatments need to be validated by NPPOs in order to use these treatments for phytosanitary purposes.  
19 Additional options for both internal and external pathogens need to be developed by both industry and  
20 government scientists and validated for use by NPPOs.

21 Seed tests can be used to check the phytosanitary status of shipments at the port of entry, but there are many  
22 gaps that need to be filled relating to testing. First, seed tests can give erroneous results if conducted on  
23 seed that has been treated. Development and validation of seed tests for high priority pathogens that can  
24 be used after seed has been treated is a need of NPPOs. Having an effective seed test available will allow

1 regulators to make informed regulatory decisions at the port of entry regarding infection status of the  
2 imported consignment.

3 Additionally, sampling methodologies for seeds is an area for further research. Sampling can influence the  
4 detectability of pathogens in seed lots. Required sample sizes could vary depending on the pathogen and  
5 seed type.

6 Many lots of seeds that move around the world contain less than 20,000 seeds. These small seed lots pose  
7 unique challenges to NPPOs in terms of sampling and testing. Often lots of seeds are too small for testing.

8 Developing effective treatments for quarantine pathogens may facilitate movement of small lots of seeds.

## 9 **10. References**

10 IPPC. 2016. ISPM 11. Pest risk analysis for Quarantine Pests. Rome, Italy.

11 IPPC. 2016. ISPM 28. Phytosanitary Treatments for Regulated Pests. Rome, Italy.

12 NAPPO. 2013. RSPM 36. Phytosanitary Guidelines for the Movement of Seed. Ottawa, Canada.

13 USDA. 2016. Treatment Manual.

14 [https://www.aphis.usda.gov/import\\_export/plants/manuals/ports/downloads/treatment.pdf](https://www.aphis.usda.gov/import_export/plants/manuals/ports/downloads/treatment.pdf)

## 1 APPENDIX 1 - Examples of different types of seed treatments

### 2 Pesticides

3 An example of chemical treatments is using Thiram to treat alfalfa seed:

4 Seeds of alfalfa (*Medicago falcata*, *M. gaetula*, *M. glutinosa*, *M. media*, and *M. sativa*)

5 Pest: *Verticillium albo-atrum*

6 Alternative treatments:

7 Treatment: Dust with 75 percent Thiram at the rate of 166 grams per 50 kilograms of seed (3.3g/kg).

8 Treatment: Treat with a slurry of Thiram 75 WP at a rate of 166 grams per 360 milliliters of water per 50  
9 kilograms of seed (3.3g pesticide/7.2ml water/kg seed).

10 (note: chemical treatment is treating with Thiram 75 WP).

### 11 Disinfectants

12 An example of disinfectant is using hot water plus chemical dip for treating citrus seeds for citrus canker  
13 (*Xanthomonas axonopodis*).

14 Seeds of Citrus (Rutaceae family)

15 Pest: Citrus Canker (*Xanthomonas axonopodis*)

16 Treatment: Hot water plus chemical dip

- 17 1. Wash the seed if any mucilaginous material, such as pulp, is adhering to the seed.
- 18 2. Immerse the seed in water heated to 125 °F (51.6 °C) or higher for 10 minutes.
- 19 3. Then, immerse the seed in a solution containing 200 parts per million sodium hypochlorite at a pH  
20 of 6.0 to 7.5 for at least 2 minutes. (Note: chemical treatment is treating with sodium hypochlorite).

### 21 Physical treatments include heat treatment and forced hot air

22 An example of a physical treatment is using steam to treat corn seed:

23 Corn (seed) (Small lots for propagation but not for food, feed, or oil purposes)

24 Pest: Various corn-related diseases

- 1 Treatment: Treat seeds with a dry application of Mancozeb in combination with Captan. Disinfect bags
- 2 by: 1) Dry heat at 212 °F for 1 hour. Treat small bales only; or 2) Steam at 10 pounds pressure
- 3 at 40 °F for 20 minutes.

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1 **APPENDIX 2 - Example of specific test sizes for seed treatments**

2 Example 1: An example of a specific test size that is approved by USDA-APHIS is 30,000 infected  
3 seed or more. No pathogen propagates should survive out of 30,000 infected seeds tested. Statistically,  
4 test results defined here provide probit 8.72 control with 99.990015 percent mortality at a 95%  
5 confidence level at 0.0001000 infection rate. Smaller numbers may be used if approved by APHIS  
6 depending on the biology of the host and pathogen. The untreated control lot size must be at least 25%  
7 as large as the lot of the seed lot used to test treatments. Use at least 4 repetitions. Each repetition should  
8 have the equivalent of 100% infected seed.

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## 1 **APPENDIX 3 - Additional considerations for developing seed treatments**

### 2 **Test Plant Pathogen**

3 Use isolates/strains of the plant pathogen of interest that represents the most pathogenic populations in the  
4 country for which the treatment is being developed. Pathogenicity should be demonstrated and maintained  
5 throughout the experimental period. The research should supply complete information on 1) identity of the  
6 taxon of the pathogen, 2) date of isolation, 3) pathogenicity, and 4) methodology for maintenance of the  
7 pathogen. Use natural or artificial inoculation and include a full description of inoculation method(s).  
8 Naturally infested or infected seed is preferred but the inoculum level should be considered carefully.

### 9 **Host Seed**

10 Conduct all preliminary tests, dose-response research, and confirmatory trials on the commodity for which  
11 the treatment is being developed.

12 Use seed of market quality that has not been treated with fungicides or other chemicals.

13 Use a cultivar that is highly susceptible to infection. Each preliminary treatment including the non-treated  
14 control repetition should include at least 100 infected seed.

### 15 **Seed Treatments**

16 Pesticide treatment - When possible, use fungicides registered in both the exporting and importing countries  
17 for the crop to be tested to avoid pesticide use issues, or trade barriers. In cases where the fungicide is not  
18 registered, appropriate regulatory authorizations may need to be obtained. Choose fungicides that have a  
19 high level of efficacy.

20 Physical treatment - hot water or oil treatments can be used on several seed commodities for various  
21 diseases. Provide a detailed description of thermal bath and procedures for conducting thermal treatment.  
22 This treatment has been known to give quarantine level of control. It may be used in conjunction with  
23 chemical treatments. Temperature readings cannot be averaged.

- 1 Disinfectants - There are several chemical seed treatments in addition to fungicides, including chlorine,
- 2 quaternary ammonium chloride, hydrogen peroxide, peroxyacetic acid that are used as disinfectants.
- 3 Researchers should give a detailed description of the equipment and procedures when testing disinfectants.

#### 4 **Equipment**

- 5 Equipment - The researchers should provide a thorough description of the treatment monitoring equipment
- 6 used during the study, e.g., sensor type, number, and placement; accuracy of monitoring equipment;
- 7 specifications of treatment equipment. Diagrams and pictures should also be supplied for all these factors
- 8 for both small-scale and confirmatory trials, as appropriate.