

**Submissions for topics for Standards and Implementation****1. General information**

<b>Submission number</b>	2023-031
<b>Title of Proposal</b>	Annex to ISPM 47 on Remote Audits
<b>Submitted by</b> (Country or Organization)	IPPC Contracting Party
<b>IPPC Official Contact Point or RPPO</b>	Canada
<b>Supported by</b>	USDA-APHIS: NPPO of the United States

**2. Contact information**

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**3. Summary of proposal**

<b>Summary of justification for the proposal</b>	Audits are important tools to evaluate whether a specific phytosanitary system or procedure conforms with the requirements set by the auditing NPPO. New technology has allowed contracting parties to conduct remote audits when in-person audits are not possible due to travel restrictions, emergency situations, financial constraints or availability of experts. Remote auditing while presenting some challenges, can offer significant benefits to contracting parties whilst also providing an appropriate level of oversight. Remote audits can also ensure continuity of audit related activities when physical visits are not practical or possible. In addition, remote audits can provide flexibility in achieving audit objectives and the ability to have additional experts participate.
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<b>Expected outcome of standard / implementation resource</b>	The proposed annex to ISPM 47 would aim to secure a common approach to remote audits, including but not limited to audits of entities other than NPPOs performing phytosanitary action, thereby increasing trust and facilitating understanding among contracting parties and trading partners.
<b>Contribution to filling gaps in the Framework for Standards and Implementation</b>	There is currently no standard or implementation resource on remote audits in the phytosanitary context.

#### 4. Type of proposed material

<b>Proposed material</b>	Standards
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#### 5. Standard/ Implementation

<b>Type of standard</b>	New ISPM or component to an existing ISPM
<b>New ISPM or component to an existing ISPM</b>	Annex to ISPM
<b>Choose an item</b>	ISPM 47 - Audit in the phytosanitary context

#### 6. Literature review

<b>Literature review</b>	<p>1) CODEX Alimentarius. (2023, March). Codex committee on food import and export inspection and certification systems (CCFICS) - Proposed draft principles and guidelines on the use of remote audit and inspection in regulatory frameworks (CL 2023/50/OCS-FICS).</p> <p>2) World Trade Organization. (2023, June 21). Sanitary and Phytosanitary Measures Thematic Session on the Use of Remote (Virtual) Audit and Verification in Regulatory Frameworks. <a href="https://www.wto.org/english/tratop_e/sps_e/thematic_session_21jun22_e.htm">https://www.wto.org/english/tratop_e/sps_e/thematic_session_21jun22_e.htm</a></p> <p>3) International Organization for Standardization. (2018). Guidelines for auditing management systems (ISO 19011:2018 (E) – (Annex A)). <a href="https://synersia.org/wp-content/uploads/2021/02/ISO-19011-2018-Pedoman-Audit-Sistem-Manajemen-EN.pdf">https://synersia.org/wp-content/uploads/2021/02/ISO-19011-2018-Pedoman-Audit-Sistem-Manajemen-EN.pdf</a></p> <p>4) International Accreditation Forum. (2021). IAF mandatory document for the use</p>
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	<p>of information and communication technology (ICT) for auditing/assessment purposes – Issue 2, version 2 (IAF MD 4:2018). <a href="https://iaf.nu/iaf_system/uploads/documents/IAF_MD4_Issue_2_Version_2_03082021.pdf">https://iaf.nu/iaf_system/uploads/documents/IAF_MD4_Issue_2_Version_2_03082021.pdf</a></p> <p>5) International Organization for Standardization. (2020). ISO 9001 Auditing Practices Group Guidance on Remote Audits (Edition 1). <a href="https://committee.iso.org/files/live/sites/tc176/files/documents/ISO%209001%20Auditing%20Practices%20Group%20docs/Auditing%20General/APG-Remote_Audits.pdf">https://committee.iso.org/files/live/sites/tc176/files/documents/ISO%209001%20Auditing%20Practices%20Group%20docs/Auditing%20General/APG-Remote_Audits.pdf</a></p> <p>6) Deuss, A. and S. Honey. (2023). Costs, benefits and effectiveness of remote audits for international food safety, OECD Food, Agriculture and Fisheries Papers, No. 196, OECD Publishing, Paris, <a href="https://doi.org/10.1787/fe97106-en">https://doi.org/10.1787/fe97106-en</a>.</p>
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## 7. Criteria for justification and prioritization of proposed topics

### 7.1. Core criteria

Criteria	Information provided by Submitter
<b>1. Contribution to the purpose of the IPPC as described in article I.1</b>	<p>Audits are essential tools to maintain and improve the effectiveness of a NPPO's phytosanitary system or procedure to prevent the international spread of plant pests. The concept of 'audit' is referenced in most ISPMs adopted by the Commission on Phytosanitary Measures (CPM), including ISPMs 2, 3, 4, 5, 6, 7, 10, 11, 12, 14, 15, 18, 20 (extensively), 21, 22, 23, 24, 26, 30, 33, 34 and 36 (extensively) and 47. 'Audit' is also an essential element of certain standards that have been approved by the IPPC CPM e.g ISPM 45- Requirements for national plant protection organizations authorizing entities to perform phytosanitary actions. The proposed annex to ISPM 47 would aim to secure a common approach to remote audits, including audits of entities other than NPPOs, thereby increasing trust in phytosanitary systems and facilitating understanding among contracting parties and trading partners.</p>
<b>2. Linkage to IPPC SOs and Organizational results demonstrated</b>	<p>The development of an annex to ISPM 47 on remote audit support the following IPPC 2020-2020 strategic objectives: Strategic objective A – Enhance global food security and increase sustainable agricultural productivity Strategic objective B – Protect the environment from the impacts of plant pests Strategic objective C – Facilitate safe trade, development and economic growth Remote audits will facilitate safe trade, and will support development and economic growth by providing guidance to NPPOs so that measures can be verified when in-person resources might not be available or possible.</p>

	<p>Additionally an annex on remote audits will also protect the environment from the impact of plants pests by ensuring that NPPOs have the necessary guidance to conduct remote audits to prevent the introduction and spread of plant pests. Conducting audits helps to ensure the effectiveness of phytosanitary systems and procedures, thereby reducing the pest risk. This protects plant health, which in turn reduces negative environmental impacts.</p>
<p><b>3. Feasibility of implementation at the global level</b></p>	<p>Partially in response to shrinking resources available, increased work load, enhanced technological tools and with the objective of being more efficient, NPPOs have been leaders in innovative approaches to phytosanitary measures, including using audits to authorize third party entities to act on their behalf (Topic 2014-002), using systems approaches supported by audits (ISPM 14 and 36), and audit of production/treatment procedures in exporting countries (ISPM 20). It is expected that the proposed annex will be relatively easy to implement as many NPPOs have already developed such approaches during the COVID 19 pandemic. Implementation will facilitate international harmonization of remote audit procedures used by NPPOs. Other international organizations (e.g. International Organization for Standardization - ISO) have undertaken significant work in this area and the proposed standard could include some of their components, modified for the use in the phytosanitary context.</p>
<p><b>4. Clear identification of the problems that need to be resolved through the development of the standard or implementation resource</b></p>	<p>Audits are referenced in many adopted ISPMs. More specifically ISPM 47 (Audit in the phytosanitary context) provides guidance to NPPOs on a common approach to conducting audits in its own territory or with and in the territory of another NPPO. Recent events have resulted in a number of NPPOs having to conduct remote audits. An Annex to ISPM 47 on remote audits would result in harmonized requirements on remote audits that contracting parties can use. In person audits can be very costly for the contracting parties involved in audits. Cost of travel has become prohibitive due to inflation and it may be difficult to organize in-person audits due to travel restrictions and other barriers. In addition, in-person audits require significant human resources to organize, participate and coordinate and in some cases may be achieved more efficiently by remote audits. As various technological tools are now available, there is a need for a common understanding and approach to help NPPOs</p>

	implement remote audits and to understand the opportunities and risks.
<b>5. Availability of, or possibility to collect, information in support of the proposed standard or implementation resource</b>	Existing and new technologies have allowed NPPOs to gain experience in the planning and implementation of remote audits in recent years as a result of travel restrictions. Experience during the COVID 19 pandemic has demonstrated that remote audits are possible and has accelerated the acceptance of such approaches. Case studies on different types of remote audits were presented to the WTO SPS thematic session on remote audit and NPPOs may also be able to provide additional case studies and examples that demonstrate the benefits of remote audits. Guidance has been developed by the International Organization for Standardization which may be a helpful resource for the development of an annex.

## 7.2. Supporting criteria

Supporting Criteria	Information provided by Submitter
<b>Practical</b>	<p>1) There is no regional standard or implementation resource currently available. Other international organizations such as CODEX and OECD are exploring this topic. ISO 9001 (19011:2018 and IAF MD 4) provides some guidance.</p> <p>2) Many countries gained experience in remote auditing during the COVID 19 pandemic. It is expected that there will be enough expertise to develop the proposed annex to ISPM 47. It may also be helpful to include expertise from other international organizations such as ISO, given their knowledge in this area.</p>
<b>Economic</b>	<p>1) Up to \$1.1 trillion worth of agricultural products are traded internationally each year and an audit standard could facilitate much of this trade, and also enhance trust in the systems of trading partners involved in the trade of these products</p> <p>2) An annex to ISPM 47 for remote audit in the phytosanitary context will provide opportunities for new trade by facilitating the use of additional equivalent measures.</p>
<b>Environmental</b>	The use of remote audits reduces the environmental impact associated with travel. In addition, having the capacity to conduct remote audits when physical visits are not practical helps to ensure the effectiveness of phytosanitary systems and procedures, thereby reducing

	the pest risk. This protects plant health, which in turn reduces negative environmental impacts.
<b>Strategic</b>	<p>1) During the second consultation of ISPM 47, both Australia and the Pacific Plant Protection Organization (PPPO) indicated that it would be useful for the standard to include measures for remote auditing.</p> <p>2) The importance and ability to conduct remote audits was highlighted during the COVID 19 pandemic. However, even under non-emergency situations remote audits may be a valuable tool for contracting parties.</p> <p>3) Developing countries may have limited resources to travel and the possibility of remote audits may offer an opportunity to conduct audits in circumstances where they would otherwise not be possible.</p> <p>4) Audits are cited in a number of ISPMs and can cover a broad range of pests and commodities.</p> <p>5) An annex to ISPM 47 on remote audits would complement ISPM 14 (The use of integrated measures in a systems approach for pest risk management) and ISPM 45 (Requirements for national plant protection organizations if authorizing entities to perform phytosanitary actions). It would be helpful to include the concept of remote audits in a future revision of the guide on audits.</p> <p>6) This would be an annex to ISPM 47 which is a conceptual standard.</p> <p>7) This need was identified in the second consultation for ISPM 47. The sudden travel restrictions implemented during the COVID 19 pandemic demonstrated the urgent need for guidance on remote audit.</p>

#### 8. Financial/in-kind resources

<b>Commitment for financial/in-kind resources to support the development of the proposed standards or implementation resource</b>	N/A
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