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Agenda items 9.3 and 8.3
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<i>English only</i>

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9.3 Conceptual challenges in standards development in terms of implementation - Commodity and pathway specific International Standards for Phytosanitary Measures (CPM 2018/29)

As requested in document CPM2018/29 decision point 3 we considered the SC request regarding ISPMs for commodities and pathways and we provide here our comments

1) Do requirements in ISPMs for commodities and pathways replace the need for technical justification

A commodity standard should not be considered an alternative or substitute for the pest risk assessment process, but it should support the PRA by specifying harmonized risk factors of the commodity and providing guidance for NPPOs on how to establish consistent phytosanitary measures. Commodity standards could facilitate carrying out the stage 3 of PRA through listing the pest risk management options for the relevant pests (agreed by CPM) that could be then selected by NPPOs as phytosanitary measures.

In line with one of the IPPC principles, Contracting Parties should not apply phytosanitary measures without technical justification. Thus, commodity standard should support contracting parties to select pest risk management options and apply phytosanitary measures.

CPs should have a clear understanding of the relationship between commodity standards and the use of general PRA frameworks to ensure that scientific and technical evidence supports and justifies the use of phytosanitary measures.

2) Broad or narrow scope of ISPMs for commodities and pathways

As already stated by the CPM, a standard need not be tagged as a particular type. Countries should have the possibility of having both types of standards (broad and narrow scope) depending on the needs that may arise as a result of the phytosanitary condition at a given time.

The development of standards with broad scope should be analyzed in a case by case basis. In such cases the scope will depends on the group of commodities, intended use, type of processing, etc.

For standards with narrow scope and before having a list of specific commodities, the criteria for prioritizing commodities or pathways should be established.

In both cases (broad and narrow scope) commodity ISPMs should aim to resolve one or several problems. The scope will vary depending on the problem being addressed by the standard.

3) Pest or quarantine pest in ISPMs for commodities and pathways

Commodity and pathway standards could include a list of relevant regulated pests. IPPC is clear that Contracting Parties shall not require phytosanitary measures for non-regulated pests. In any case as this type of ISPM would address harmonized phytosanitary measures, NPPOs shall only establish these measures for regulated pests according to the corresponding pest risk assessment.

Furthermore criteria on how to define the pest list should be developed. Otherwise it will be extremely difficult to agree on a list of regulated pests to be included in the ISPMs for commodities and pathways as different countries have different quarantine pests.

These ISPMs should include pest risk management options and such as phytosanitary treatments and other phytosanitary measures for pest groups.

4) Should ISPMs for commodities and pathways include requirements or obligations for importing countries

A commodity standard may include requirements for importing countries. In fact many adopted ISPM include such requirements.

The management of the diversion from the intended use is not the responsibility of the NPPO of the exporting country. The NPPO of the importing country under no circumstances should demand additional import requirements to address the pest risk resulting from possible diversion from intended use.

The issue of diversion from intended use should not be considered in commodity and pathway standards.

Therefore, COSAVE members countries suggest modifying Decision 2) of CPM2018/19 document as follow:

Agree the potential benefits of these ISPMs in providing NPPO with ~~ready-made phytosanitary measures harmonized pests risk management options for relevant pests associated with specific commodities that eliminate the need for comprehensive pest risk assessment or bilaterally negotiated treatments for common pests~~ to simplify trade and expedite market access negotiation and facilitate safe trade.

8.3 IPPC Draft Strategic Framework 2020-2030 (CPM2018/28)

Although CPM is invited to provide high level substantive comments on the current draft content of the Strategic Framework, we consider appropriate to launch a full country consultation in 2018 in order to provide specific technical comments to the text.

In this paper we only provide substantive comments as requested to CPM following the structure of the draft.

Strategic Objectives

B. Enhance global food security and increase agricultural productivity.

2030 key result areas

Text under B4 is not clear regarding this key result area. We believe that what is expected is the wide implementation of systems approaches for pest risk management to minimize pest risk right through the production process and harvesting and minimize the need of endpoint treatments. As it is worded, there is a confusion with pest management systems.

C. Protect the environment from the impact of plant pests

Under this objective there is also confusion between systems approaches for pest risk management, pest management systems and integrated pest management (third paragraph).

Development agenda 2020 2030

Even if the focus of IPPC standards development activity is shifted to commodity standards, other relevant topics could also be included in the Standard Setting Process.

According to our understanding of the concept of a commodity standard presented in our statement regarding document CPM 2018/29, we suggest revising the Strategic Framework as follows:

2. Commodity & Pathway Specific ISPMs: ISPMs developed for specific commodities and pathways, with accompanying diagnostic protocols, phytosanitary treatments and guidance.

Desired 2030 Outcome: Many new ISPMs have been adopted and implemented for specific commodities and pathways, with accompanying diagnostic protocols and phytosanitary treatments to support implementation. They provide NPPOs ~~with ready-made~~ harmonized phytosanitary measures, which they may use ~~instead of undertaking to support~~ their own pest risk analysis ~~or bilaterally negotiating unique treatments for common pest risk~~. This has simplified trade and expedited market access negotiations.

Description: Trade is no longer characterized by the exchange of finished products alone, but also by the coproduction of goods between countries. Some of the largest agricultural companies diversify their presence and production around the world. This enables companies to shift plants and plant products around the world to respond to fluctuations in demand, as well as source agricultural materials from different countries and regions. Plant health strategies need to evolve to respond and manage pest risks as business practices and production methods change. The IPPC can respond by generating commodity and pathway specific standards that will facilitate safe trade and reflect both traditional and changing business practices for the international movement of plants and plant products. These standards should be accompanied by pest specific diagnostic protocols, phytosanitary treatments, surveillance methods, and other guidance material which will help countries to fully implement new standards. In most cases, trade can only occur after bilateral negotiation between countries to ensure they are satisfied phytosanitary risks will be appropriately managed. These negotiations are based on SPS principles and IPPC standards. Over the years, multiple trading partners bilaterally, negotiate rules to manage pest risks associated with a commodity or pathway, even though often, many of the pests associated with the commodity are identical in each of the bilateral negotiations. Significant advances in trade facilitation would be made if standards (ISPMs) were developed that established ~~harmonized pest~~ risk management ~~options~~ for the major pests associated with a commodity or a pathway. Countries would still ~~be free~~ need to negotiate measures for pests of concern not cover by the ~~baseline~~ commodity or pathway specific ISPM. Future standard setting will ~~change the~~ focus more and more on commodity or pathway specific topics rather than on broad conceptual and foundational issues which have been largely addressed. ~~This may necessitate that standard setting formats, procedures and practices are reviewed and if necessary adjusted to facilitate the smooth identification and prioritization of topics as well as the efficient development and adoption of such standards.~~

Activities to be carried out during 2020 - 2030 would include:

- ~~Agree on a priority to~~ develop two initial commodity or pathway specific ISPMs ~~from topics identified and approved by CPM as needed~~ with accompanying diagnostic protocols,

phytosanitary treatments, surveillance methods, and other guidance material, ~~and as needed, adjust the standard setting and implementation support processes.~~

- Conduct an assessment of the critical factors necessary for an NPPO to effectively implement a new commodity standard, and the barriers that have to be overcome.
- Agree on ~~the criteria to prioritize~~¹ a ~~priority~~ list of commodity and pathway specific ISPMs and secure country and industry commitments to support development.
- After implementation, evaluate the economic, trade, food security, and environmental benefits delivered by a selection of commodity or pathway specific standards.

7. New Phytosanitary Treatments: A strengthened and coordinated effort to identify and develop new sustainable phytosanitary treatments and alternative pest risk management approaches.

Activities to be carried out during 2020 - 2030 could include:

- Identify top priority commodities and pests for new treatments and communicate these widely to the science and treatment provider community.
- Intensify current activities on phytosanitary treatments.
- Establish technical panels to develop alternative pest risk management approaches for individual pests or commodities.²

¹ We suggest modifying this activity, considering the difficulties to prioritize commodities for which CPs have a common interest. We think that CPM could agree on the criteria to give priority to the development of a commodity and pathway specific ISPM. These criteria should consider the complexity of the commodity, number of products within that commodities, range of pests and the intended use. We understand that it could not be possible a priori to agree on a priority list for this type of standards, considering that they should be justified based on a real perceived need for global harmonization

² We understand that it is not necessary to establish technical panels for individual pest or commodities. An expert working group could also address the development of alternative pest risk management.