



Objections to draft ISPMs recommended for adoption by CPM-20 (2026)

COMMISSION ON PHYTOSANITARY MEASURES

TWENTIETH SESSION

OBJECTIONS TO DRAFT ISPMs RECOMMENDED FOR ADOPTION BY CPM-20 (2026)

AGENDA ITEM 11

(Prepared by the IPPC Secretariat)

Background

- [1] Draft International Standards for Phytosanitary Measures (ISPMs) recommended for adoption by the Commission on Phytosanitary Measures (CPM), excluding draft diagnostic protocols (DPs), are posted on the CPM page on the International Phytosanitary Portal (IPP) in all official FAO languages at least six weeks before the CPM session.¹
- [2] Following the *IPPC standard setting procedure* (SSP)², IPPC contracting parties may submit objections to the adoption of draft ISPMs by CPM no later than three weeks before the CPM session, following the instructions available on the IPP.³
- [3] If no objection is received, the CPM will adopt the draft ISPMs without discussion.
- [4] If objections to the adoption of an ISPM are received, the objections should be completed and submitted by the IPPC Official Contact Points to the IPPC Secretariat (hereafter referred to as the “secretariat”) and they must be accompanied by technical justifications and suggestions for improving the draft ISPM that are likely to be acceptable to other CPs.
- [5] CPM-19 (2025) confirmed that the process of objections allows CPs and regions to propose text improvements. This followed the conclusion of the Standards Committee that, for technical issues that are not formal objections, the current process for objections sufficed, as it already accommodated a means to submit proposed improvements.
- [6] The secretariat will post a CPM information paper detailing the objection or objections on the IPP immediately following the closure of the call for objections and contracting parties will be notified via the IPP. Concerned contracting parties should make every effort to seek agreement before the CPM session. The objection or objections will be added to the CPM agenda and the CPM will decide on a way forward.
- [7] Contracting parties may also submit minor editorials to the secretariat. Other points of concern that do not warrant an objection can also be submitted to the secretariat, who will keep them for consideration during a future revision of the relevant ISPM.

¹ CPM-20 dedicated webpage: <https://www.ippc.int/en/commission/cpm/cpm-sessions/cpm-20-2026/>

² *IPPC procedure manual for standard setting*: <https://www.ippc.int/en/publications/85024/>

³ Current objections to the adoption of ISPMs: www.ippc.int/en/core-activities/standards-setting/member-consultation-draft-ispms/objections-draft-ispms-prior-cpm

Objections received by the IPPC secretariat

[8] The secretariat had received the following objections to the adoption to the draft ISPMs presented for adoption by CPM-20 (2026) by the deadline of 16 February 2026, 12:00 (GMT+1).⁴ These are:

- Annex 1: Draft revision of ISPM 26 (*Establishment and maintenance of pest free areas for tephritid fruit flies*) (2021-010), as available in CPM 2026/10_01⁵, from Chile on behalf of Argentina, Bolivia (Plurinational State of), Brazil, Chile, Paraguay, Peru and Uruguay (Comité de Sanidad Vegetal del Cono Sur (COSAVE) member countries), in Spanish and English version; and
- Annex 2: Draft annex *Field inspection* (2021-018) to ISPM 23 (*Guidelines for inspection*), as available in CPM 2026/10_02⁶, from United Kingdom of Great Britain and Northern Ireland.

The designations employed and the presentation of material in this document do not imply the expression of any opinion whatsoever on the part of the Food and Agriculture Organization of the United Nations (FAO) concerning the legal or development status of any country, territory, city or area or of its authorities, or concerning the delimitation of its frontiers or boundaries.

⁴ For more details, please refer to CPM paper 2026/10_Rev1: <https://www.ippc.int/en/publications/95378/>

⁵ CPM 2026/10_01 - DRAFT REVISION OF ISPM 26: Establishment and maintenance of pest free areas for tephritid fruit flies (2021-010): <https://www.ippc.int/en/publications/95420/>

⁶ CPM 2026/10_02 - DRAFT ANNEX TO ISPM 23: Field inspection (2021-018): <https://www.ippc.int/en/publications/95421/>

Annex 1: Draft revision of ISPM 26 (*Establishment and maintenance of pest free areas for tephritid fruit flies*) (2021-010) - Chile on behalf of Argentina, Bolivia, Brazil, Chile, Paraguay, Peru and Uruguay (COSAVE member countries)

[1] Spanish version:

<p>Reunión de la CMF / Período de notificación relativo a los PD: <i>[Inserte la reunión y el año de la correspondiente reunión de la CMF o, en el caso de los protocolos de diagnóstico, las fechas del período de notificación]</i></p> <p>CMF – 20 (2026)</p>
<p>Presentación de una objeción a la adopción del siguiente proyecto de NIMF, proyecto de tratamiento fitosanitario (TF) o proyecto de protocolo de diagnóstico (PD): <i>[Inserte el título y número de tema del proyecto al que se presenten objeciones]</i></p> <p>PROYECTO DE REVISIÓN DE LA NIMF 26: Establecimiento y mantenimiento de áreas libres de plagas para moscas tefritidas de la fruta (2021-010)</p> <p>Según lo acordado en la CMF-19 el proceso de presentación de objeciones permite el envío de mejoras técnicas al texto. En este sentido, COSAVE y sus países miembros no objetan la adopción de la NIMF pero presentan una mejora técnica para el texto, cuestionando la inclusión de definiciones de algunos términos, principalmente la de “área libre de plagas para moscas de la fruta” (FF-PFA).</p>
<p>Parte contratante que presenta la objeción: <i>Chile en representación de Argentina, Bolivia, Brasil, Chile, Paraguay, Perú y Uruguay (países miembros de COSAVE)</i></p>
<p>Fecha de presentación: 13 de febrero de 2026</p>
<p>Persona de contacto: <i>[Inserte el nombre y los datos correspondientes al punto de contacto o a otra persona con quien se pueda establecer contacto a fin de ayudar a resolver la cuestión antes de la reunión de la CMF]</i></p> <p>Nombre: Marco Antonio MUÑOZ FUENZALIDA</p> <p>Cargo y organización: JEFE (S) DIVISION DE PROTECCION AGRICOLA Y FORESTAL del SERVICIO AGRICOLA Y GANADERO</p> <p>Dirección postal: Paseo Bulnes # 140, piso 3. Santiago de Chile</p> <p>Tel.: +562 2345 1201</p> <p>Correo electrónico: marco.munoz@sag.gob.cl</p>

Introducción: *[Exponga la objeción y enumere las inquietudes de la parte contratante. Cuando proceda, indique las iniciativas que se tomaron para resolver tales inquietudes antes de la presentación de la objeción.]*

El borrador de revisión de la NIMF 26 en ninguna de las dos rondas de consulta a los países tenía una sección de definiciones de términos específicos. De esta forma, Chile y países miembros de COSAVE consideran pertinente proponer mejoras técnicas al texto que no constituyen objeciones formales, conforme a lo aclarado en la CMF-19.

Los países miembros de COSAVE cuestionan la pertinencia de incluir algunas de las definiciones en la nueva versión de la NIMF 26 presentada a adopción y consideran innecesarias las siguientes:

Material hospedante

Fruta

Mosca de la fruta objetivo

Área libre de plagas para moscas de la fruta FF-PFA

Justificación técnica de la objeción: *[Agregue texto a fin de justificar técnicamente la objeción y facilitar pruebas que la apoyen. Remítase asimismo a los Criterios para ayudar a determinar si una objeción está técnicamente justificada (aprobados por la CMF-8 (2013), disponibles en el Manual de procedimiento de la CIPF para el establecimiento de normas: <https://www.ippc.int/es/core-activities/ippc-standard-setting-procedure-manual/>)]*

La definición propuesta de “área libre de plagas para moscas de la fruta” (FF-PFA) es incoherente con la definición acordada del término “área libre de plagas” definición que por otra parte tiene su origen en el acuerdo MSF y cuya revisión se propone incluir en el plan de trabajo del CN. Tampoco es equivalente determinar que la mosca de la fruta objetivo está ausente en un área (de conformidad con la NIMF 8) y declarar un área libre de plagas de la mosca de la fruta objetivo (FF-PFA) en esa misma área. De acuerdo con los requisitos para el establecimiento de un “área libre de plagas” establecidos en la NIMF 4 (ratificados en el ámbito del borrador que está para adopción) cuando un país exportador declara la ausencia de una plaga en un área (de conformidad con la NIMF 8), el país importador no debería exigir el establecimiento de un ALP.

Las definiciones de material hospedante y fruta no tienen un significado específico en esta norma y además son términos que se usan con su significado común.

La definición de “mosca de la fruta objetivo” es una explicación y no una descripción del concepto.

Sugerencias para la mejora del proyecto de NIMF / TF / PD: *[Proporcione por escrito sugerencias destinadas a mejorar el proyecto de NIMF / TF / PD con el fin de responder a las inquietudes planteadas en la objeción. Indique los próximos pasos que habrán de darse para buscar un acuerdo antes de la reunión de la CMF o, en el caso de los PD, antes del siguiente período de notificación relativo a los PD.]*

Sugerimos no incluir una definición para el término “área libre de plagas para moscas de la fruta” específica para las moscas, ya que el concepto de “área libre de plagas” está armonizado y debería aplicar a cualquier tipo de plagas.

Sugerimos no incluir las definiciones de material hospedante, fruta y mosca de la fruta objetivo. Las aclaraciones pueden incorporarse al texto del borrador sin necesidad de crear un término. Como consecuencia, se propone modificar:

- En la sección 2, agregar ejemplos de material hospedante: [...] *Podrían tratarse temas como la importancia de establecer y mantener el ALP-MF y la importancia de evitar la introducción o reintroducción de la mosca de la fruta objetivo mediante material hospedante que pudiera estar infestado (esto es, flores y frutas, en sentido botánico)*[...]
- El último párrafo de la sección 6.4 como se describe a continuación: *La detección de moscas de la fruta estériles no afecta al establecimiento de un ALP-MF, ~~ya que no son la mosca de la fruta objetivo (véase la sección “Definiciones”).~~*

[2] English version:

<p>CPM session / DP notification period <i>[Insert the session and year of the relevant CPM session, or for DPs the dates of the notification period]</i></p> <p>CPM – 20 (2026)</p>
<p>Submission of an objection to the adoption of the following draft ISPM, draft Phytosanitary treatment (PT), or draft Diagnostic protocol (DP) <i>[Insert the title and topic number of the draft being objected to]</i></p> <p>DRAFT REVISION OF ISPM 26: Establishment and maintenance of pest free areas for tephritid fruit flies (2021-010)</p> <p>As agreed at CPM-19, the objection process allows for the submission of technical improvements to the text. In this regard, COSAVE and its member countries do not object to the adoption of the ISPM but are submitting a technical improvement to the text, questioning the inclusion of definitions for some terms, primarily that of “fruit fly pest free area” (FF-PFA).</p>
<p>Contracting party submitting the objection: <i>Chile on behalf of Argentina, Bolivia, Brazil, Chile, Paraguay, Perú and Uruguay (COSAVE member countries)</i></p>
<p>Date of submission: February 13, 2026</p>
<p>Contact person: <i>[Insert the name and contact details of the contact point or another person who can be contacted to help resolve the issue before the CPM meeting]</i></p> <p>Name: Marco Antonio MUÑOZ FUENZALIDA</p> <p>Position and Organization: JEFE (S) DIVISION DE PROTECCION AGRICOLA Y FORESTAL del SERVICIO AGRICOLA Y GANADERO</p> <p>Mailing Address: Paseo Bulnes # 140, piso 3. Santiago de Chile</p> <p>Tel.: +562 2345 1201</p> <p>Email: marco.munoz@sag.gob.cl</p>
<p>Introduction: <i>[Introduce the objection and list the concerns of the contracting party. Where appropriate, indicate what was done to try to have those concerns addressed before the submission of the objection]</i></p> <p>The draft revision of ISPM 26 did not include a section defining specific terms in either of the two rounds of country consultation. Therefore, COSAVE and its member countries, consider it appropriate to propose technical improvements, which do not constitute a formal objection as clarified in CPM-19.</p> <p>COSAVE member countries question the relevance of including some of the definitions in the version of ISPM 26 submitted for adoption and consider the following unnecessary:</p> <ul style="list-style-type: none"> Host material Fruit Target fruit fly Fruit fly pest free area (FF-PFA)

Technical justification to the objection: *[Add text to technically justify the objection and provide evidence supporting the objection. Also, refer to the Criteria to help determine whether an objection is technically justified (approved by CPM-8 (2013)) and available in the IPPC Procedure Manual for Standard Setting: <https://www.ippc.int/en/core-activities/ippc-standard-setting-procedure-manual/>]*

The proposed definition for “fruit fly pest free area” (FF-PFA) is inconsistent with the agreed definition of the term “pest free area,” a definition that originates from the SPS Agreement and whose revision is proposed for inclusion in the SC's work plan. Furthermore, determining that the target fruit fly is absent in an area (in accordance with ISPM 8) is not equivalent to declaring a target fruit fly pest free area (FF-PFA) in that same area. According to the requirements for establishing a “pest free area” set out in ISPM 4 (ratified within the scope of the draft currently under adoption), when an exporting country declares the absence of a pest in an area (in accordance with ISPM 8), the importing country should not require the establishment of a pest free area.

The definitions of host material and fruit do not have a specific meaning in this standard and are used with their common meaning.

The definition of “target fruit fly” is an explanation, not a description, of the concept.

Suggestions for improvement of the draft ISPM / PT / DP: *[Provide text suggestions to improve the draft ISPM / PT / DP in order to address the concerns raised in the objection. Indicate the next steps to be undertaken to seek agreement before the CPM or for DPs before the next DP notification period]*

We suggest not including a definition for the term “fruit fly pest free area” specific for fruit flies, as the concept of “pest free area” is harmonized and should apply to any type of pest.

We suggest not including the definitions of host material, fruit, and target fruit fly. Clarifications can be incorporated into the draft text without creating a new term. Consequently, the following modifications are proposed:

- In section 2, add examples of host material: *[...] This could be on topics such as the importance of establishing and maintaining the FF-PFA, and the importance of avoiding introducing or reintroducing the target fruit fly through potentially infested host material (e.g. flowers and fruits, in the botanical sense)[...]*
- Last paragraph of section 6.4 can be modified as follows:
 - *Detections of sterile fruit flies do not affect the establishment of an FF-PFA, ~~as they are not the “target fruit fly” (see Definitions).~~*

Annex 2: Draft annex *Field inspection* (2021-018) to ISPM 23 (*Guidelines for inspection*) - United Kingdom

[1] Below are the introduction, technical justification and suggestions for improvement of the draft ISPM as provided by the submitter.

[2] Contact person:

- **Name:** Mr Sam BISHOP
- **Position and Organization:** Head of Plant & Bee health and PVS Policy, Department for Environment, Food and Rural Affairs (DEFRA), United Kingdom
- **Mailing Address:** Room 11G35, Defra, Sand Hutton, York, YO41 1LZ, United Kingdom
- **Email:** uknppto@defra.gov.uk

2. Introduction

[3] The United Kingdom NPPO objects to the adoption of the draft annex *Field inspection* (2021-018) to ISPM 23 (*Guidelines for inspection*). ISPM 23 is already on the IPPC work plan for revision, and the Draft Specification for the Revision of ISPM 23 (2023-014) has completed first country consultation. Because the specification intends to modify ISPM 23 substantially, including terminology, definitions, internal structure, and its relationship to field inspection, adopting the annex ahead of the ISPM's revision would create conceptual and operational inconsistencies between the annex and the core standard.

[4] The UK raised concerns through comments submitted during the second round of OCS consultation on the draft annex. We understand that these comments were considered during the November 2025 meeting of the Standards Committee but as the report of the meeting has not yet been published we do not know the details of the discussions. Given the long duration of the standard setting process, adopting the annex now risks leaving an inconsistent annex–standard pairing in place for several years potentially affecting harmonized implementation by contracting parties.

3. Technical justification

a) *Inconsistency due to timing*

[5] The Specification for the Revision of ISPM 23 (*Guidelines for inspection*) (2023-014) indicates that the revision is intended to align terminology with ISPM 5, address differences between the current use of the term inspection in ISPM 23 and the definition of inspection in ISPM 5, update and clarify requirements for inspection procedures and connect the core text of ISPM 23 with the annex on field inspection.

[6] If the annex is adopted now, before the core text of ISPM 23 is revised, part of the intended package of changes would be implemented in isolation. This breaks the sequence foreseen in the specification and reduces internal coherence during the interim period. Based on recent standard-setting timelines, it will take a minimum of two years before a draft revised ISPM 23 is ready for consultation and four to five years before a revised ISPM 23 could be adopted by CPM. As CPM-18 assigned the revision priority 2 in 2024, the timeline could be even longer. The timeline for new or revised implementation materials would be longer still. In this period, contracting parties would have to implement an annex that is out of alignment with the overarching ISPM 23, affecting harmonized implementation by contracting parties.

[7] Recognizing that the revision of an adopted annex must follow the standard setting procedure, any contradictions or discrepancies between the current ISPM 23 and the annex could persist and remain unaddressed for several years, undermining ISPM coherence for a protracted period.

b) *Inconsistency that risks misapplication*

- [8] Without the clarifications expected in the ISPM 23 revision, two different concepts of inspection, one consignment-based and broad, the other field-based and narrow, would coexist within the same standard. This risks NPPOs diverging in their interpretations regarding how field inspection results should relate to consignment inspection outcomes, how field inspection findings influence certification steps and the role of field inspection within systems approaches. A period of operational ambiguity is therefore likely until the revised ISPM 23 resolves these definitional differences.

c) *Coherence across standards*

- [9] The ISPM 23 revision specification identifies an existing gap between ISPM 23 terminology and ISPM 5 definitions. This needs to be resolved to maintain cross-standard coherence. The suggestion of the annex being developed as a standalone ISPM was considered by the Standards Committee at the SC meeting in May 2025. While the SC decided to retain it as an annex, their conclusion was linked to the expectation that the revised ISPM 23 would be restructured to integrate the annex coherently. Adopting the annex before this structural revision occurs would create a mismatch between the annex and the core text creating a period where the cross-standard alignment foreseen by the specification will not be achieved.

d) *Lack of clarity and risk of misapplication*

- [10] The draft annex intends to distinguish field inspection from specific surveillance and provide clear objectives and processes for field inspection. The revision of ISPM 23 is similarly intended to clarify the treatment of inspection and other compliance procedures, including documentary, identity, and integrity checks, and to ensure that these are consistently presented in the revised standard. If the annex were adopted before these clarifications are finalized in the core text, definitions and boundaries between these concepts remain insufficiently defined until the revision is complete and likely to affect consistent implementation by NPPOs in certification and systems-approach contexts.

4. Suggestions for improvement of draft ISPM

- [11] To address the concerns above and ensure coherence across standards, the UK NPPO proposes CPM accept one of the following three alternative options:

a) *Primary suggestion (most preferred): Field inspection as a standalone ISPM*

- [12] Given the conceptual separation between consignment inspection and field inspection, the UK strongly recommends that CPM consider developing field inspection as a standalone ISPM. This would avoid persistent inconsistencies, ensure clearer conceptual boundaries and make an immediate revision of ISPM 23 unnecessary. The current ISPM 23 is clear that it is about inspection of consignments, and the draft annex is clear that it is about field inspection. These are distinct concepts and different technical areas, combining them within a single standard risks reducing clarity and complicates implementation for contracting parties. Further, ISPM 23 could be renamed “Inspection of consignments” to make the contents clearly distinguishable from an ISPM on “Field inspection”.

b) *Alternative suggestion (less preferred than option a): Defer adoption*

- [13] As an alternative to a standalone ISPM on field inspection, UK suggests that the adoption of the annex is deferred until the revision of ISPM 23 is finalized. This would allow definitions, cross references, and process flows to be aligned and enable simultaneous adoption and consistency between the core text and annex. This would also follow the sequence anticipated in the revision specification and would avoid multi-year misalignment and related implementation challenges.

c) *Alternative suggestion (less preferred than option b): Adopt with an automatic alignment clause*

- [14] Alternatively, if CPM is determined to adopt the annex now, a CPM alignment clause mandating immediate editorial/technical re-alignment of the annex on adoption of the revised ISPM 23, plus

Secretariat guidance for transitional use is suggested. For example, CPM include a Decision/Note in the CPM report and the status box stating: “This annex will be automatically scheduled for editorial/technical alignment and re-review at the time of adoption of the revised ISPM 23 (2023-014), to ensure consistency of terms (ISPM 5), scope, and cross references. NPPOs should treat the annex as provisional with respect to terminology until the ISPM 23 revision is adopted.” This would of course require a change to the Standard Setting Procedure.