



COMMISSION ON PHYTOSANITARY MEASURES

TWENTIETH SESSION

SC'S POSITION AND TPDP'S RECOMMENDATION ON "RETHINKING ISPMS"

AGENDA ITEM 6.1

Background

- [1] The discussion on improving the clarity, readability, translatability, and overall usability of ISPMS originated during the 2023 consultation on the reorganized pest risk analysis (PRA) standards and was formally brought forward by New Zealand at the 2024 CPM Strategic Planning Group (SPG) meeting¹ and again at CPM-19². The papers presented highlighted how structural complexity and drafting practices may negatively affect implementation, while proposing potential solutions to enhance accessibility and flexibility. Contracting parties acknowledged the importance of ensuring that ISPMS can be consistently understood and implemented by NPPOs; however, some Contracting parties expressed concerns regarding the scope of the proposed "rethinking" process, including possible involvement of other standard-setting bodies, resource implications, risks associated with removing guidance from standards, the role of IPPC subsidiary bodies, and the potential increase in workload.
- [2] CPM subsequently agreed that improving the clarity and usability of ISPMS should be treated as a core strategic issue and placed it on the agenda of the 2025 SPG meeting, inviting submissions from SPG members and contracting parties, as well as contributions from the Standards Committee (SC). The SC expressed appreciation to New Zealand and the Pacific Plant Protection Organisation (PPPO) for initiating this important discussion and reaffirmed its commitment to analysing the concerns raised and identifying practical, shared solutions to ensure ISPMS remain clear, implementable, and fit for purpose.

SC Considerations on 'Rethinking ISPMS'

- [3] An important consideration is the diversity of ISPMS types: some are technical (e.g., Diagnostic Protocols - DPs, Phytosanitary Treatments - PTs), while others are conceptual (e.g., PRA, PFA standards). The structure and language of each ISPMS should reflect its nature and the target audience.
- [4] The SC supports the use of plain language to enhance accessibility and understandability but stresses the importance of defining what "plain language" means. Language should be clear, concise, consistent flow and understandable while maintaining technical precision.
- [5] Technical standards such as DPs are directed at laboratory staff and researchers, while conceptual ISPMS target policy makers or phytosanitary officers or border officers or headquarters personnel.
- [6] ISPMS serve as frameworks for developing national regulations, guidelines, requirements and SOPs. Technical ISPMS, therefore, must include a degree of guidance to aid understanding of the requirements only.

¹ SPG 2024 paper from New Zealand: <https://www.ippc.int/en/publications/93862/>

² CPM 2025/47: <https://www.ippc.int/en/publications/94206/>

- [7] Regarding the complexity of ISPMs, the SC believes that improving clarity does not necessarily entail reducing technical content or losing important information. The technical depth should be appropriate for the standard's audience and purpose. For example, DPs require precise, specialized language for technical experts.
- [8] The SC considers assessment or acknowledgement of the potential impact of any ISPM review process, including its implications for SC workload both immediately and into the future. It is acknowledged that the workload may increase in the short term as any change is implemented, but it is also anticipated that this could reduce overtime as efficiency of ISPM text is improved.

SC Considerations on the Standard Setting Process

- [9] Draft texts approved by the SC for consultation and CPM adoption would benefit from further revision by a copy editor to enhance clarity and structural consistency. Providing greater flexibility to the copy editor may also reduce the volume of editorial comments stewards must address after consultations.
- [10] Engaging a plain-language expert to support the standard-setting process could enhance clarity from the outset and reduce the need for revisions later in the process.

SC Proposals

- [11] The SC proposes the following:
- **Enhanced editorial support:** Alter the understanding of SC agreement to draft ISPM text allowing the copy editor to review draft texts approved by SC and SC7 to increase clarity and consistency.
 - **Engaging a plain-language expert:** Assign an external expert to support the standard setting process starting from the expert drafting group.
 - **Flexible ISPM models:** Develop tailored structures for different types of ISPMs. For example:
 - A tiered structure for ISPMs, with the core requirements presented at the beginning of the document, followed by more detailed guidance later on (allowing NPPOs to quickly identify what is obligatory and what is guidance in the document).
 - For DPs, consider the possibility of two versions: a brief version with essential diagnostic guidance, and a full version including background, validation data, and hyperlinks (e.g., to high-definition images, particularly for fungi).
 - **Clarification of obligation terminology:** Provide a plain-language explanation of key modal verbs (e.g., should, shall, must, may, can, could) either in the front or end matter of ISPMs or on the IPP Adopted Standards page, with a link from the ISPM itself.
 - **Revised editorial review process:** Explore new mechanisms for editorial review of standard drafts, including the following options:
 1. Keep editorial review in the hands of the copy editor and plain-language expert.
 2. Limit editorial comments to the second round of consultation only.
 3. Include a disclaimer in the OCS inviting editorial comments only when they affect text comprehension.

TPDP's proposals and recommendations

[12] The Technical Panel on Diagnostic Protocols (TPDP) discussed this issue at its 2025 meeting and emphasized the following points specifically regarding DPs:

- **Translation:** The panel noted that advances in artificial intelligence could facilitate more efficient translation of DPs into additional languages in the future.
- **Contact points:** The TPDP emphasized the importance of the contact points section in each DP, noting that it is specifically intended to address the needs of contracting parties by providing the contact details of designated experts who can offer technical support and information.
- **Reading and implementation:** Members stressed the need to read each DP in full at the outset to clearly understand the minimum diagnostic requirements before implementation.
- **Revision of the *Instructions for Authors*:** The TPDP recalled that part of its current work programme includes the revision of the document on the [Instructions for Authors](#)³. As part of this revision, a proposal that could be considered is to include guidance in DPs on how to meet minimum diagnostic requirements, for instance by summarizing them in a table.
- **Intended audience of DPs:** The TPDP reaffirmed that DPs are technical documents intended for laboratories performing pest diagnosis, as stated in ISPM 27. Such laboratories may be established under, or authorized by NPPOs, so that diagnostic results can be considered as part of NPPO phytosanitary measures.
- **Capacity development:** The panel noted that additional capacity development activities and initiatives could be provided under IPPC programmes to support the implementation of DPs, as one of the main constraints in implementing DPs is the uneven level of expertise among contracting parties.
- **Information on constraints:** The TPDP highlighted the need for more information on existing constraints in the use and implementation of DPs specifically, to better identify gaps and address challenges.

³ TPDP Instructions to Authors of diagnostic protocols: <https://www.ippc.int/en/publications/tp-diagnostic-protocols-instructions-authors-diagnostic-protocols/>