

**COMMISSION ON PHYTOSANITARY MEASURES****TWENTIETH SESSION****STATEMENTS OF COSAVE COUNTRIES ON CPM-20 AGENDA ITEMS 6.1 AND 13.1.1****AGENDA ITEMS 6.1 AND 13.1.1****Agenda item 6.1 “Rethinking ISPMs” (CPM 2026/44)**

- [1] COSAVE and its member countries agree that the proposed pilot work on ISPM readability can begin. However, in case CPM agrees to proceed with the Observatory survey, we suggest clarifying its objective in decision point (1), which we understand is to better understand the implementation problems of current ISPMs and to determine whether many NPPOs are experiencing these problems. Additionally, we consider it premature for the Secretariat to dedicate efforts to developing guidelines for the use of plain language by the SC, IC, and expert working groups. In this regard, we suggest completing the assessment proposed in decision points 2 and 3 of document CPM 2026/44 before discussing the need to develop such guidelines. Having reviewed the CPM 2026/INF/29 document submitted by the EU, we share the suggested modifications to decision points 2 and 3 and to limit the scope to the use of plain language and not other cross-cutting issues with other ISPMs. Therefore, we suggest the following modifications to the decision points of that document:

*The CPM is invited to:*

- (1) Agree to conduct a survey, using the Observatory including targeted interviews, to gather further quantitative and qualitative data on ~~the topic of rethinking ISPMs implementation challenges due to the complexity of the text in ISPMs identified~~
- (2) Agree to invite a plain English specialist to participate in the ~~next two~~ draft ISPM Expert Working Groups (EWGs) ~~on the standard on safe provision of humanitarian aid in the phytosanitary context~~ or invite a scientific copy editor to review the drafts produced by ~~that the next two ISPM EWGs~~ before ~~they are~~ it is presented to the Standards Committee.
- (3) Agree that the ~~next 2~~ EWGs ~~on safe provision of humanitarian aid in the phytosanitary context~~ takes into consideration the suggestions from the 2025 SPG meeting ~~regarding only the use of plain language~~, including from the papers submitted by the Standards and Implementation Committees.
- (4) ~~Agree that the IPPC Secretariat, working with the Standards and Implementation Committees, develops plain language guidelines for use by the Standards Committees, Implementation Committees and EWG. If necessary, a plain language expert could be engaged to assist with this process.~~

**Agenda Item 13.1.1 “IPPC ePhyto solution implementation update including governance status (CPM 2026/11)**

- [2] The ePhyto (as a specific, centralized, and harmonized electronic certification project) was designed as a single, multilateral point for certificate exchange, precisely to avoid the need for bilateral negotiations, agreements, or technical validations. Its purpose was to allow all connected NPPOs to exchange certificates based on a common standard and a centralized infrastructure.

- [3] However, several countries continue to require additional technical testing, specific pilot phases, or even the formalization of bilateral agreements before accepting ePhytos, even when the exporting country is already registered, fully operational on the Hub, and actively exchanging ePhytos with other partners.
- [4] It is not feasible to require country-by-country validation with more than 140 participants to confirm something that is already fully functional. Such an approach might have been understandable in the early stages of the ePhyto initiative (2018, 2019, 2020), when only a limited number of countries were connected and the system was still being consolidated.
- [5] The ePhyto Steering Group (ESG) could play a more active role in this matter, either by more clearly promoting the multilateral vision of ePhyto or by encouraging the establishment of a centralized validation mechanism. Such a mechanism would allow for a one-time assessment of a National Plant Protection Organization's (NPPO) technical and operational compliance with the ePhyto Solution, enabling ePhytos issued by that country to be considered valid by all other countries registered in the Hub.
- [6] It is important to note that the validation mechanism referred here is about the technical confirmation of exchanges and not about the acceptance by NPPOs of the commencement of ePhyto use.
- [7] To address this issue, COSAVE member countries believe it is necessary to add a new task to the ePhyto Steering Group's terms of reference as follows:

*The ESG will:*

- ❖ *Identify governance issues and recommend solutions to the Bureau for decision;*
- ❖ *Identify, prepare for, and support the implementation of technical changes, considering:*
  - *The governance structure model and decision-making framework*
  - *Availability of funds*
  - *Criticality of the changes, considering the quality of services and security main priorities*
  - *Impact of the changes on the final users*
  - *Expected benefits of the changes*
- ❖ *Monitor the execution of the ePhyto budget against the agreed priorities;*
- ❖ *Promote the multilateral vision and use of ePhyto, and actively support and collaborate in maintaining a unified implementation approach and coherent communication among all stakeholders.*
- ❖ *Promote a multilateral approach for the validation of ePhyto exchanges between contracting parties registered in the IPPC ePhyto Solution, including the development of principles, guidelines, or best practices aimed at reducing unnecessary bilateral validations, trial phases, or specific agreements once countries are connected to the IPPC ePhyto Hub and operating in accordance with agreed standards.*
- ❖ *Identify implementation requirements of the ePhyto-related ISPM(s);*
- ❖ *Regularly review and confirm [ .....]*