



COMMISSION ON PHYTOSANITARY MEASURES

TWENTIETH SESSION

EU STATEMENT ON RETHINKING ISPMs

AGENDA ITEM 6.1

(Submitted by EU)

General remarks on the recommendations:

- [1] From the discussions during SPG, it is quite difficult to draw up concrete recommendations for CPM.
- [2] The recommendations provided in this paper are good. However, taking into consideration that SPG agreed to take a first step with Improving the plain language, recommendation (3) appear to be broad and leaves room for other changes to be made on the structure of ISPMs which needs further exploration and consensus and whose relevance will be better understood after recommendation (1) has been implemented. Written as such, recommendation (3) seems to be contradicting recommendation (1)

Considerations for applying plain language in next 2 EWGs

- [3] The EWGs planned for 2026 are: reorganization and revision of PRA standards, safe provision of humanitarian aid in the phytosanitary context and revision of ISPM12 (phytosanitary certificate). Considering the importance of the PRA standard and ISPM12 and the fact that the plain language approach is novel and bound to go through a trial period where it will be refined and optimized, it would be appropriate that this approach first tested on the development of new standards and not on already adopted standards which are to be revised such as the PRA reorganization standards and the ISPM12 revision.
- [4] Furthermore, we find the recommendation to streamline the implementation of plain language at the drafting stage of the standards very appropriate.

Proposals for amending recommendation points:

- [5] Having taken note of the [SCs position and TPDP recommendations on rethinking ISPMs](#) (CPM 2026/INF/24) and the IC paper presented during SPG 2025 (08_ SPG_2025_Oct), we would like to suggest changes to recommendations (2), (3) and (4) as follows:
- [6] (2) Agree to invite a plain English specialist to participate in the draft ISPM Expert Working Group (EWG) *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 EWG before it is presented to the Standards Committee.

(3) Agree that the *EWG on safe provision of humanitarian aid in the phytosanitary context* takes into consideration the discussions from the 2025 SPG meeting *regarding plain language only*, including from the papers submitted by the Standards and Implementation Committees.

(4) Agree that *following the experience gained from implementing Recommendation (3)*, 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.

Further considerations:

- [7] Finally, we would like to highlight that our understanding of using plain language in standards is that the wording, structure and design of the sentences are clear to the NPPOs that they can easily find the information they need in a standard and understand it. This is in line with the definition of plain language by the international plain language federation.
- [8] We continue to reiterate that the use of plain language should not lead to the proliferation of annexes and guidance documents nor to the alteration of the technical content of the ISPMs.