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Concept of a commodity standard - Report of the Working Group and recommendations from the SPG and SC
Agenda item 8.3
Prepared by the CPM chair, CPM vice-chair and chair of the Working Group on the concept of a commodity standard, with input from the IPPC Secretariat¹

I. Introduction

1. A number of discussions over the last two years have considered the purpose, status and content of International Standards for Phytosanitary Measures (ISPMs) in general and more specifically the concept of a commodity standard. The CPM decided that a Working Group on the Concept of a commodity standard (WG) should be convened. The CPM also decided that the report of this group should be presented to the Strategic Planning Group (SPG) which should provide written input on strategic issues to the Standards Committee (SC). The Working group conclusions and recommendation have also be discussed by the Capacity Development Committee (CDC). The SC would make recommendations to the CPM.

¹ Rev 01 was produced in English only on 29/01/16 to correct the title of the heading IV - rev. 02 was produced in English only on 10/02/16 to clarify the paragraph 27.

II. Working group on the concept of a commodity standard

2. The WG met in Edinburgh from 20-24 July 2015. The report from this meeting is posted on the IPP². The group undertook the tasks specified in the Terms of Reference (attached to meeting report), including discussion and analysis of:

- the purpose, content and format of commodity standards
- a process for the development of commodity standards and
- a system to maintain and update commodity standards.

3. The WG considered the potential challenges associated with developing commodity standards but also noted that there could be benefits with their development. It was not clear to some experts whether the development of specific commodity standards was a priority for the CPM or whether the CPM was ready to agree on potential global requirements set in commodity standards. Some WG members felt a survey of contracting parties (CPs) was needed, but in the end, this was not recommended.

4. The WG recognised that there were different types of commodities (a single commodity, groups of similar/related commodities and broad commodity classes) which would have different challenges when agreeing harmonised requirements (in particular the numbers of pests associated with groups of commodities/commodity classes). The experts considered that a commodity standard should have a defined scope and that it should aim to resolve one or several problems. These should have already been identified in the relevant submission for a new topic for a standard. Commodity standards should contain requirements and a simple draft template for commodity standards was prepared.

5. Regarding the process for development of commodity standards, the WG recommended that the existing standard setting procedure should be used. When considering the draft Framework for Standards and Implementation, the group proposed that a combined call for development of topics for standards and tools for implementation should be considered. This would help the CPM set clear priorities and help the Secretariat with work planning.

6. The WG considered that the Phytosanitary resources web page is a useful repository of information and it would be important to have resources relevant to commodity standards available.

7. It was considered essential to involve industry associations in the development of commodity standards from an early stage, including during drafting, commenting on draft specifications and draft standards and helping with advocacy and implementation of the standards. To facilitate the faster development of commodity standards and to increase flexibility in processes, the following options were proposed:

- submission of topics for commodity standards at any time
- submission of a draft standard in response to the call for topics
- delegating authority to the SC to add proposals for commodity standards as subjects in the *List of topics for IPPC standards*
- allowing CPs to prepare a new draft or draft revision of a commodity standard for submission to the SC.

8. WG participants highlighted that commodity standards would need frequent revision in order to keep them up to date and some suggestions were made to facilitate this. It was also envisaged that initial versions of commodity standards could be produced to deal with major issues, with further elements added as needed.

9. The WG discussed the costs associated with developing and maintaining commodity standards as well as capacity development for their implementation. The WG therefore invited the SPG to

² WG Report: <https://www.ippc.int/en/publications/81503/>

consider asking the Bureau to consider the resource implications as well as the possibility of sponsorship of the development of commodity standards by international industry associations.

10. The WG felt that there were often urgent issues related to commodities or pests associated with them that should be addressed quickly. The development of a standard would be appropriate in the longer term, but may not be appropriate in the short term for raising the issue and promoting immediate action.

III. SPG Consideration of the WG conclusions and recommendations

11. The SPG considered the report of the WG at its meeting in October 2015³ and provided strategic comments for consideration by the SC. The SPG supported many of the suggestions made by the WG. In addition, the SPG:

- Encouraged the SC to test whether the criteria for inclusion of new topics were appropriate for commodity standards.
- Noted the complexity of development of commodity standards because they may need to set requirements for many pests.
- Supported continued development of draft standards on the List of topics for IPPC standards.
- Agreed that phytosanitary treatments should also be developed to ensure tools are available for CPs.
- Suggested further consideration of where commodity standards fit within the Framework for Standards and Implementation.
- Considered that there should be consideration by the CPM of whether the benefits of commodity standards outweigh the challenges and costs of developing them.
- Suggested striving for setting global appropriate levels of protection (similar to ISPM 15) for commodities, targeting the most important pests or groups of pests for the commodity and ensuring the levels of protection match the risk (trade barriers vs. safe trade).
- Stressed the importance for the IPPC to retain relevance by obtaining global agreement on concrete topics (commodity or pathway related) not only on concepts.
- Suggested that commodity standards could be used as pilots for “sponsorship of standards”.

IV. SC Consideration of the WG conclusions and recommendation

12. At its meeting in November 2015, the SC considered the conclusion and recommendations of the WG, together with the outcomes of discussions of the report by the SPG.

13. The SC acknowledged the work undertaken by the Working Group on the Concept of a Commodity Standard. In general discussion SC Members raised questions regarding the objectives of commodity standards and particularly the challenges associated with harmonizing risk management options for pests of plants and plant products in trade, where the applications of measures should be directed by a pest risk analysis of the importing country.

14. Similarly, a global commodity pest list as the basis for harmonized pest risk management options was not seen as viable because all countries regulate different pests according to their pest status (ISPM 8 Determination of pest status in an area). Subsequent discussion on identifying commonly regulated pests, most often intercepted or managed pests in relation to the draft cut flowers,

³ Report SPG 2015: <https://www.ippc.int/en/publications/81716/>

failed to achieve an agreed list for building harmonized risk management measures, thereby illustrating the difficulties of this approach.

15. Some members suggested that there should be a continued focus on the development of additional pest risk management options, which was consistent with a similar point made by the SPG.

16. Standards that harmonize the implementation of the Convention, including the effective risk management of significant pests impacting food security, trade and the environment are a priority for the IPPC and its Contracting Parties (CPs). The SC did not consider the development of commodity standards to be any more relevant, feasible or of higher priority than any other standard on the List of topics for IPPC standards.

17. Further, there is nothing in the current standard setting procedure that prevents CPs from proposing topics for standards that harmonize the management of phytosanitary risks on a particular commodity. In fact, the current procedure, which requires that CPs proposing topics clearly define the problem and its impact on the global movement of pests, will assist CPs to identify the purpose and benefit of any commodity standard proposed. The purpose and outcome of the standard is laid out in a specification for each standard and is approved by the SC. The specification defines the scope of the standard and relates directly to the resolution of the problem identified in the topic.

18. The potential for harmonized measures to be developed for specific commodity pests, as has been done for Tephritid fruit flies, offers a mechanism for identifying pests requiring global action.

19. The SC recognized that it is important for the CPM to establish a mechanism to deal with emerging phytosanitary risks. The SC considered that this is an area for urgent consideration by CPM given recent movements of significant pests such as *Fusarium oxysporum* f.sp. *cubense* race TR4 and *Xylella fastidiosa*.

20. The SC noted the principles in the WG report that standards should contain requirements and be used to achieve harmonization. However the SC agreed that standards should aim to harmonize PMs but may not always contain specific requirements. With this in mind, it considered that the agreed scope of a standard, as it is defined in the approved specification, determines the nature of any requirements it should contain. For example, a standard with a broad scope (in relation to the commodities covered by such standards) may have less specific requirements than a standard with a narrow scope.

21. The SC recognized that a standard is similarly directed by its agreed scope, and this removed the need for standards to be tagged as a particular type, such as a commodity standard.

22. The SC discussed terms including 'commodity', 'commodity class' and 'commodity group'. It was agreed that the glossary definitions for the two former terms should be reconsidered by the TPG in the context of this discussion as they were found to be confusing, particularly the application of commodity classes.

23. Given the considerations above, the SC developed an approach to accommodate the concept of commodity standards, within existing processes for consideration by CPM.

A. An integrated approach to harmonising phytosanitary measures in commodities

24. The SC strongly supports the Framework for Standards and Implementation as the basis for planning and prioritizing the development of standards and other tools. It recognized that the Framework includes concepts of the phytosanitary import and export regulatory system and their implementation to address phytosanitary risks associated with conveyances and on commodity pathways.

25. The SC recognizes that some adopted standards and some under development, which have a focus on harmonizing phytosanitary risk management associated with a commodity or pathway, have become stratified around the varying levels of requirements they contain. While varying in the number and nature of requirements, the requirements in each of the standards are appropriate to the effective management of phytosanitary risks that standard is intended to achieve and which is defined in the scope.

26. In keeping with its conclusion that existing standard setting processes are appropriate for managing commodity standards, the SC proposes the stratification or layering of these standards in the Framework, from broader to more specific. Broader standards would describe the options to manage the pest risks in a group of commodities (such as wood, plants for planting, seeds, grains, fruit and vegetables) that would be linked to more specific standards creating a suite of requirements from broad to specific. This suite of standards could cover groups of commodities specified at different levels in more or less detail as determined by the scope, which would determine where these sit within the framework.

27. Examples of these narrowly scoped standards include ISPM 15 (Regulation of wood packaging material in international trade), ISPM 33 (Pest free potato (*Solanum* spp.) micropropagative material and minitubers for international trade), ISPM 36 (Integrated measures for plants for planting), Tephritid fruit fly standards (ISPMs 26, 30, 35) and draft standards for wooden handicrafts and growing media associated with plants for planting. They may also pick up recently proposed topics. Pathway-specific standards should be based on a pest risk analysis carried out according to the principles laid down in appropriate ISPMs on pest risk analysis.

28. The SC considered that developing a standard for each particular layer may or may not be needed but should be determined when decisions are made by the SC when making recommendations to the CPM on adding topics to the List of topics for IPPC standards and assigning priorities for the topics such as avoiding duplication of information from one standard to another.

29. The SPG had encouraged the SC to test whether the current criteria for inclusion of new topics are relevant to determine the development of commodity standard topics. The SC discussed the issue when reviewing the submissions received in answer to the 2015 call for new topics for standards and felt the criteria should be reviewed at a later stage.

30. The SC considered that guidance should be developed to assist the assessment of topics for standards within the Framework as it would be expanded to accommodate the layers.

31. This concept is illustrated using existing adopted and draft standards as follows:

A. *The following illustrates the layer concept for wood:*

Example of a Standard with a Broad Scope

International Movement of Wood (draft)

Example of Standards with a narrower Scope that are or may be linked to a broad standard

Regulation of wood packaging material in international trade (ISPM 15)

International movement of wood products and handicrafts made from wood (draft)

International movement of lumber (topic – considered but not recommended)

Use of systems approaches in managing risks associated with the movement of wood commodities (topic – considered but not recommended)

***B The following illustrates the potential
layer concept for fruit and vegetables for human consumption:***

Example of a Standard with a Broad Scope

Pest risks associated with fruit and vegetables for human consumption in international trade

Example of Standards with a narrower Scope that are or may be linked to a broad standard

Pest-based

ISPM 26 (*Establishment of pest free areas for fruit fly* (Tephritidae))

ISPM 30 (*Establishment of areas of low pest prevalence for fruit flies* (Tephritidae))

ISPM 35 (*Systems approach for pest risk management of fruit flies* (Tephritidae))

Phytosanitary treatments (irradiation, cold etc)

Host-based

International movement of apples (topic– considered but not recommended)

International movement of tomato fruit (topic– considered but not recommended)

32. The SC noted that some members of the SPG considered a pilot could be used to help understand feasibility challenges for the future work on specific commodities. Progressing a topic to a specification will likely draw out a range of considerations for the harmonization of measures for the international movement of a single commodity and test the assumption that current processes are sufficient to do this. It may also inform the proposed guidance.

33. The SC considered that requirements in a chapeau standard are likely to be broad and may potentially set a minimum standard suitable for global use.

34. The SC strongly supported closer collaboration between standard setting and implementation and also strongly supported that CPs should be encouraged to submit phytosanitary resources relevant to the management of pest risks associated with commodities or groups of commodities for possible inclusion in the phytosanitary resources web page.

35. The SC agreed that the current standard setting procedure should be followed for developing all standards, and therefore they felt it was premature to consider changes to the existing procedure to make it more flexible for commodity standards. This could be reviewed in future.

36. Consistent with the SC consideration that existing processes should be used, the SC was of the view that a specific template for standards that focus on risk management of a commodity is not needed.

37. The SC considered that the approach described above, addresses the remaining conclusions and recommendations made by the WG.

V. CDC Consideration of the WG conclusions and recommendations

38. Further to the discussions by the SPG and the SC, the conclusions and recommendations of the WG were also considered by the CDC, as one member of the CDC had attended the WG.

39. The CDC suggested that the concept of using manuals and other tools to address commodity related issues should always be considered, whether or not an ISPM is developed. If there are no clear requirements for an ISPM, other options of tools intended to implement the IPPC could be identified, such as guidelines, recommendations, manuals and brochures, among others. The more appropriate type of tool(s) needs to be selected on a case by case basis.

40. The CDC was cautious about the need of such type of standard and noted that this would involve a lot of commodities and that the benefits of such work need to be considered.

41. The CDC suggested that sound criteria should be established to determine the appropriateness of developing a commodity standard.

42. The CDC concluded that it is too soon to make a decision on such standards, that further consideration is needed and that another WG should be established. This WG should consider the question of what is the objective of the standard being developed (e.g. food security) as well as the end use of the commodity and the cost/benefit of its development. The CDC suggested that the WG should be small, with one representative from the original WG, the CDC, the SC and the SPG and should be established as soon as possible after CPM-11 (2016). It should be tasked to produce a report in time for consideration by the CDC and SC in May 2016 and SPG before CPM-12 (2016).

VI. Recommendations

43. This paper consolidates the consideration of the concept of a commodity standard by the WG, SPG SC and CDC during 2015. Actions to address and progress the issues raised by the groups have been integrated into the following recommendations.

44. The CPM is invited to:

- 1) *Note* the considerations by the WG, SPG and SC and the CDC in relation to the concept of commodity standards.
- 2) *Agree* that the development of commodity standards is no more relevant, feasible or higher priority than any other standards or implementation tools and that there is nothing in the current standard setting procedure that prevents CPs from proposing topics for standards that harmonize the management of phytosanitary risks on a particular commodity or group of commodities.
- 3) *Agree* that a standard need not be tagged as a particular type, such as a commodity standard, but rather focus on defining requirements or guidance for harmonization that are appropriate to the effective management of phytosanitary risks that the standard is intended to achieve and which is defined in its scope.
- 4) *Consider* whether a combined call for topics for standards and tools for implementation should be made, which would be reviewed with input from the SC and CDC, or its successor. If agreed, request the SC and CDC to review and adapt the current process to allow the call to be made, including any changes to the assessment criteria needed.
- 5) *Agree* that any submission in response to a call for topics and tools should clearly define the problem needing resolution in sufficient detail to determine how it fits into the Framework of Standards and Implementation and the cost/benefit of the development of the standard or tool.
- 6) *Agree* the expansion of the Framework of Standards and Implementation to accommodate the definition and application of layers for the management of phytosanitary risks associated with conveyances and on commodity pathways.

- 7) *Request* that the IPPC Secretariat, in collaboration with the SC and CDC, develop guidance on these layers of standards and their requirements for presentation to CPM-12 (2017).
- 8) *Agree* that a small working group undertakes a desk study based on drafting a specification for a standard as a pilot to inform an analysis of the outcomes, benefits and challenges of developing a commodity-specific standard. Develop the terms of reference for the group.
- 9) *Consider* at CPM-12 (2017) whether the benefits of commodity standards outweigh the challenges of developing them, using information generated by the small working group and subsequent considerations by relevant CPM bodies.
- 10) *Request* the Bureau to consider, at an appropriate time, the resource implications in relation to the development and updating of commodity standards as well as to building capacity for their implementation and to consider possible mechanisms for funding by donors (e.g. using commodity standards as a pilot for “sponsorship of standards”).
- 11) *Encourage* CPs to provide phytosanitary resources relevant to the management of pests associated with commodities or groups of commodities for possible inclusion in the phytosanitary resources web page in response to specific calls for resources.
- 12) *Request* the Bureau, in consultation with SC and CDC, to urgently establish a mechanism to deal with emerging issues that require global action.