Core Criteria for a Commodity-Pathway Standard

 or Guidance Document

Submitted by Australia

Commodity standards as International Standards for Phytosanitary Measures (ISPMs) have been a recent development in the International Plant Protection Convention (IPPC). There are now several commodity standards in the drafting or planning stages, including the international movement of wood, cut flowers, wood handicrafts, grain and seeds.

Achieving consensus by contracting parties to the IPPC on what should be included in these standards, or whether they can even be considered standards has been difficult. A formal objection received prior to the Commission on Phytosanitary Measures (CPM) – 10 (2015) on the draft ISPM on the International movement of wood highlighted this.

CPM10 agreed that there was a need for further discussion and analysis on the concept of a commodity standard. A small expert working group was established and met in July 2015. They were asked to complete the tasks in their terms of reference and produce a report for the Strategic Planning Group (SPG) and Standards Committee (SC). The SC would then provide recommendations to CPM 11 (2016) for consideration.

Pending the posting of the expert working group report, it was clear that the working group would need to consider a number of issues on which opinions differed. These include the need for a commodity or a commodity class standard, their particular purpose and whether resources should be directed to the development of standards based on commodity rather than to address a defined phytosanitary risk or harmonise processes for a defined outcome.

Australia proposes a possible way forward within existing standard setting processes that would focus the contracting parties’ articulated need for a specific commodity-pathway standard and provide guidance to the Standards Committee.

Australia is of the view that commodity standards are better considered pathway standards. This focuses on the risk management processes rather than the underlying pest risks, which are determined through pest risk analysis. A focus on risk management also provides support for the development and application of phytosanitary treatments, which are themselves a core area of IPPC standards development work.

One of the tasks for the expert working group was to identify a number of principles that relate to commodities. The SPG and SC should discuss these and could consider them for inclusion in the Core Criteria for Justification and Prioritisation of Proposed Topics (*the criteria*). There may be further phytosanitary principles related to a commodity-pathway that could also be included. The CPM would need to agree on these specific criteria and their inclusion in *the criteria* when related to the submission of a pathway-commodity topic.

Including these new pathway criteria as part of *the criteria* has the advantage of not requiring the development or agreement by contracting parties of a new standard setting process for commodity-pathway standards and the IPPC Secretariat would not have to administer a new process.

Furthermore, once a proposed topic has gone through this prioritisation process and is not considered to fit the defined purpose of a standard by the SC and CPM, but describes a problem that requires action, the specification could be forwarded to the CDC/Implementation section of the IPPC Secretariat for consideration and development in appropriate guidance material.

Proposed Core criteria for consideration by the SPG against which a specific commodity may be assessed for justification and prioritisation as a proposed topic for an ISPM or guidance material (e.g. to be included as sub-criteria under criteria 4 “Clear identification of the problems that need to be resolved through the development of the standard”):

* Pathway – identify where there is a pest risk specific to the commodity that can not be addressed through existing IPSMs.
* Identify pest risk factors specific to the commodity or group of commodities that should be considered
* Phytosanitary measures- identify where there is a pest risk that can not be addressed through existing phytosanitary measures (e.g. phytosanitary treatments).
* Intended use – identify where the intended use creates a pest risk that can not be addressed through existing IPSMs.
* Elements specific to the production and trade of the commodity or group of commodities which may affect the pest risks
* Identify unique characteristics of the commodity or group of commodities where harmonization would facilitate safe trade
* Identity of the commodity – the botanical names of plant commodities of a composite nature are not always possible to establish for determining pest risk.
* Place/s of origin - places where the commodity was grown or produced and where it was possibly exposed to regulated pests.

The table below provides some examples of how the current commodities in the drafting or planning phases may be considered as an ISPM (annexes, appendices) or guidance documents.

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| **Commodity-Pathway** | **Annex/****Appendix/Guidance document** | **Comments** |
| International movement of seed | Annex | This commodity/pest pathway could benefit from harmonisation as seeds can be produced in one country and then stored/mixed/blended/multiplied in another country before arriving in the country of final destination. This leads to difficulty in establishing the identity and pest profile of the product and establishing appropriate phytosanitary measures. Additionally, the international movement of seeds can lead to the entry of a pest (seed borne pathogen) but may not necessarily lead to the establishment of the pest (if not a seed transmitted pathogen). |
| International movement of cut flowers | Appendix/Guidance document | This commodity/pest pathway’s requirements for the trade of this commodity are available in existing standards. The one main issue that is not addressed in existing standards is the risk of (diversion from) intended use. However, this is a cross-cutting issue that is under further consideration within the IPPC. |
| International movement of grains | Appendix/Guidance document | This commodity/pest pathway’s requirements for the trade of this commodity are available in existing standards. The two issues that are not addressed in existing standards are diversion from intended use and traceability. However, these are cross cutting issues that are under further consideration within the IPPC. |
| International movement of wood handicrafts | Annex | This commodity/pest pathway could benefit from harmonisation as wood handicrafts are often constructed from a range of plant materials which causes difficulties in establishing its identity and pest profile. |