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## **COMMISSION ON PHYTOSANITARY MEASURES**

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Position paper on the proposed ISPM International Movement of Grain

## Agenda item 8.1.4

## **Prepared by the United States of America**

1. This paper addresses document number CPM 2013/06 of the agenda 8.1.4 List of topics for IPPC standards: International Movement of Grain (2008-007).

#### I. Issue

After carefully considering the revised specification for the standard on the International 2. Movement of Grain, the USA would like to reaffirm its preference for developing a technical guidance document rather than a standard at this time. The USA does not agree that a standard based on the current specification is a necessary or desirable way to address the needs for guidance expressed by member countries at the Open Ended Working Group in 2011. The USA is concerned that a comprehensive but ill-considered standard will not adequately clarify the numerous issues related to the international movement of grain, and may do more harm than good by covering too many topics too generally to provide useful guidance to member countries.

#### П. Background

Despite lengthy consideration at CPM 4 (2009), an Open ended workshop (2011), at CPM 7 3. (2012) and by the SC (2012), IPPC member countries have not been able to reach consensus on the need for a grain standard or its content.

#### Discussion III.

The USA acknowledges and appreciates the hard work of the steward, member countries, and 4. the SC in drafting, reviewing, and revising the specification on the International Movement of Grain.

5. The international movement of grain is a broad and complex issue. Grain is a broad categorization of many diverse products which have significant diversity in type and phytosanitary

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risk. Grain is a functionally defined term in the Glossary as "a **commodity class** for seeds intended for processing or consumption but not for planting." It includes the dried seeds of grasses, legumes and other oil producing plants, each of which are produced, harvested, handled, packaged, processed, transported and consumed in an often unique variety of ways and subject to widely varying pest complexes.

6. A standard is not an appropriate document for describing grain movement and for providing harmonized guidance. The specification, as written, contains an unprecedented amount of explanatory technical background material. This descriptive information could be more fully, clearly and usefully provided to members in a guidance document.

7. There may be issues related to the international movement of grain where harmonized guidance on phytosanitary measures would benefit all member countries. However, it is not clear that a separate ISPM on grain as described by the specification is the best way to provide this guidance. Further consideration needs to be given to identifying issues that may require harmonized guidance and the best way to provide this guidance.

### IV. Proposal

8. For the reasons outlined above, the USA believes that the needs of IPPC member countries for technical information and harmonized guidance related to international movement of grain would be best served at this time by 1) developing technical guidance on the international movement of grain and 2) further considering issues related to harmonized guidance. Attached to this paper is an example of topics that could be included in the technical guidance.

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