

THE COMPOSITION AND USE OF EXPLANATORY DOCUMENTS TO INTERNATIONAL STANDARDS FOR PHYTOSANITARY MEASURES

Prepared by the IPPC Secretariat, June 2004

1. Introduction

The preparation of explanatory documents has been discussed on many occasions by countries' delegates at Interim Commission for Phytosanitary Measures (ICPM) meetings. However, at its sixth Session in April 2004, the ICPM made the following decisions:

11.3 Policy on the Production of Explanatory Documents, Training Guides and other Supporting Documentation

110. The Strategic Planning and Technical Assistance working group noted the demand for explanatory documents, manuals and similar documents to help countries implement provisions of the International Plant Protection Convention (IPPC) and International Standards for Phytosanitary Measures (ISPMs). The Secretariat presented the recommendations of the Informal group on Strategic Planning and Technical Assistance (SPTA) and noted that the SPTA had reviewed similar activities of other international organizations. The SPTA recommendations were reviewed and amended.

111. The ICPM:

1. *Endorsed* a policy to allow explanatory documents, training guides and similar documents to be developed and distributed under the auspices of the Secretariat.
2. *Decided* that these documents be reviewed by experts acting under the auspices of the Secretariat before publication, but that the draft documents would be made available to the Standards Committee (SC) which may comment in the reviewing process.
3. *Decided* that these documents would be published under the name of the author acting under the auspices of the Secretariat, with a clear disclaimer that these cannot be taken as an official legal interpretation of the IPPC or its related documents, and are produced for public information purposes only.
4. *Decided* that these documents be placed on the International Phytosanitary Portal (IPP).

This document is written to provide guidance to the prospective writers of the explanatory documents and to provide advice on how the explanatory documents should be used.

2. The purpose of explanatory documents on standards

Standards by their nature are often not easy documents to understand. This is not because the language is difficult or the writing is complex, but because a standard describes a particular set of activities often using specific terminology. The definition of standard in ISPM No. 5 (*Glossary of phytosanitary terms*) is:

Document established by consensus and approved by a recognized body, that provides, for common and repeated use, rules, guidelines or characteristics for activities or their results, aimed at the achievement of the optimum degree of order in a given context.

The activities described in a standard are usually technical, aimed at a certain result, with the idea of having all who carry out this series of activities doing it the same way. Usually, this also means that those using the standard and achieving the result know precisely what they are doing. So the standard describes the set of activities but does not necessarily explain them.

This leaves those who are not well used to the activities described in the standard without explanation of the content of the standard and of why certain activities are done the way they are. This is the case with ISPMs. Some more detailed explanation may be given in some areas of the standards but generally this is limited. Therefore, it has been suggested that explanatory documents be made available to those who want them. Such documents would explain what the standards apply to, and how they are employed and would note any difficulties in using a particular standard. These explanatory documents should be seen as tools to inform, clarify difficult issues and assist in the implementation of ISPMs.

3. Form of the explanatory document

Normally, a document of 5-10 pages would be sufficient to help with the understanding of the standard. In certain cases, longer documents could be necessary. Diagrams or flowcharts may be of assistance in certain circumstances (for example to explain relationships with other ISPMs) as long as they do not introduce more questions than they answer. Presentations in the form of Powerpoint or its equivalent may well be helpful for some officials in training roles.

The name of the writer of the explanatory document will be at the head of the document.

4. Status and use of explanatory document

Readers of explanatory documents should recognize that these documents are written by one expert, and they are not standards in themselves. The expert will be familiar with the standard and with international thinking on the standard. The explanatory documents will be reviewed by the Secretariat and other experts (including the Standards Committee), and it is unlikely that they will contain contentious or incorrect statements. However, it is important that readers note that the comments of the expert are those of the expert only, and cannot be quoted as part of a standard. The Secretariat has been concerned that papers published under the auspices of the Secretariat could be regarded as an official interpretation of the standard. These explanatory documents are not official interpretations – they are the comments of the expert writer of the explanatory document only.

5. The content of an explanatory document

Explanatory documents will differ in some matters of form depending on the subject of the standard. Some might describe various aspects of the standard at length, others might concentrate on particular problem areas that the standard deals with, whilst for other standards with fewer difficulties the explanatory document might be quite short. However, whatever the length of the explanatory document, it should cover a number of basic areas. These include:

- Purpose and relationships with other standards
- General form of the standard
- Contents of the standard
 - ... the major headings should be listed
- Major points of concern
- References to additional explanatory material.

5.1 Purpose and relationships with other standards

This section should describe the general intent of the standard and say how it fits amongst the other standards.

Some of the more recent standards have a section on the purpose of the standard (for example ISPMs No. 17 and 19) but this is generally quite short. It needs to be made quite clear what the standard was written for, what problems it was meant to try to solve and what benefits might accrue from its use.

An explanatory document can discuss how a standard fits into the framework of the IPPC and how it relates to other standards. For example, the relationship of the standards on pest risk analysis, and the link between *Export Certification system* and *Guidelines for phytosanitary certificates* would be noted. In later years, the links between a concept standard and specific standards will be able to be described – for example *Guidelines for surveillance* and *Surveillance for citrus canker* (standard not completed yet).

5.2 General form of the standard

The form of the standard relates to the requirements section of the standard, not the administration section (Endorsement, Application, Review and amendment, Distribution) or the Introduction (Scope, References, Definitions and abbreviations, Outline of requirements).

The basic structure of the standard could be commented on: for example, the three main stages of pest risk analysis in ISPM No. 11, the respective responsibilities of those involved in the import and release of biological control agents in ISPM No. 3, or the technical issues listed in ISPM No. 18 the *Guidelines for the use of irradiation as a phytosanitary measure*) – treatment, dosimetry, approval of facilities, phytosanitary system integrity etc. The reasons for the structure could be explained if not immediately obvious.

5.3 Contents of the standard

In this part of the explanatory document, the individual sections of the standard can be discussed. Obviously, this might not always be necessary, and when this is the case, no explanation should be offered. However, with many standards background information could well be of great assistance to those not familiar with the activities described in the standard. This is the particular use and help of the explanatory documents.

5.4 Major points of concern

With some points in some standards it may be helpful to provide a background to the discussions that led to the particular point being expressed or the way it is expressed. There may have been contentious issues discussed at the Expert Working Group, at the Standards Committee meeting, in country consultations or at the ICPM. It is helpful for users of the standard to be aware of the difficulties that have arisen, been debated and hopefully solved. These are often the very points that new users of the standard have concerns about and where they need guidance. This section could also list points which have shown to be of particular concern when starting to apply the standard (e.g. treatment schedules) or found to require systematic consideration when applying a standard (e.g. consideration of environmental consequences under economic consequences in the earlier versions of the PRA standards).

5.5 References to additional explanatory material

The references noted here are not those referred to in the standard. If available, they should provide additional background to the standard. This may be material on the way some countries and their agencies apply the standard or other discussion documents on the standard (generally information that will be useful in understanding the use of the standard).