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Revocation and replacement of old versions of ISPMs
Agenda item 8.5
Prepared by the IPPC Secretariat¹

I. Background

1. Since the adoption of the first International Standard for Phytosanitary Measures (ISPM) in 1993 (ISPM 1: *Principles of plant quarantine as related to international trade*), many ISPMs have undergone revisions. ISPMs can be revised in different ways: they may be partially amended, the full text revised, or supplements, annexes and appendixes added (which themselves may be amended, revised or eliminated). In addition, ISPMs have been modified by ink amendments, by changes to language versions following Language Review Groups (LRG) review and by minor modifications to correct errors.

2. As old versions of ISPMs have never been officially revoked by the Commission for Phytosanitary Measures (CPM), this has led to a situation whereby the latest versions of ISPMs co-exist with older versions of the same ISPM. The latest versions of ISPMs are made available on the International Phytosanitary Portal (IPP)² on the “adopted ISPMs” main page. Old versions of the same ISPMs may also be found on the IPP, clearly indicated as previous versions. The status of these older versions and their provisions, in relation to the status of the latest versions, is not totally clear for the IPPC contracting parties. Besides, some of the latest versions of ISPMs still contain cross-references to old versions of other ISPMs which have now been revised. This issue has been raised by the CPM and Standards Committee (SC). The IPPC Secretariat considered this situation should be rectified and undertook an in-depth analysis of all ISPMs, in close consultation with FAO Legal Office.

3. A simplified mechanism is proposed to:

- clarify which versions of ISPMs are in force, and

¹ The agenda point number was corrected on 19th January.

² IPP page on the adopted ISPMs: <https://www.ippc.int/core-activities/standards-setting/ispm>

- set up a mechanism to ensure older versions of ISPMs are replaced by the latest versions of an ISPM and are revoked when revisions are adopted.
4. Changes to some existing ISPMs, including modifications to cross-references to old versions of ISPMs, need to be applied in order to allow these old versions of ISPMs to be revoked and no longer applicable.
 5. During their May and November 2014 meetings³, the SC reviewed the whole analysis undertaken by the Secretariat.

II. Proposed changes to existing ISPMs and mechanism for the future

6. As the revocation of old versions of ISPMs implies that any cross-reference to such old versions be modified, all cross-references to other ISPMs were reviewed in all existing ISPMs. In this respect, the SC approved ink amendments, which are presented to the CPM for noting in Attachment 1 (English only) to this paper. Once these ink amendments are noted by the CPM, they will be submitted for translation. Proposed translations of ink amendments will be submitted to the LRG process prior to publication⁴.
7. Besides, other changes will have to be implemented by the Secretariat (as resources allow) to allow the revocation of old versions of ISPMs and facilitate the process in the future. These changes include minor editorial amendments to ISPMs as approved by the SC and changes to the format of the publications for ISPMs⁵.
8. In addition, the SC agreed that in the future, when an ISPM is revised, the expert drafting group should review all references to the ISPM under revision in other ISPMs to ensure that they are still relevant and propose consequential changes if necessary, as this work is needed to allow the previous version of the ISPM to be revoked. Such a task was added by the Secretariat to all current specifications for the revision to an ISPM where drafting has not begun. Consequently, the SC noted:
 - when revisions of ISPMs are prepared for member consultation that consequential changes to other ISPMs will also be presented.
 - when revisions of ISPMs are presented to the CPM for adoption that the consequential changes will also be presented as ink amendments.
 - that upon adoption of a revised ISPM, the CPM will be requested to *revoke* the previous version of the ISPM and *replace* it with the newly adopted revision.
9. The mechanism to simplify future revision and adoption of ISPMs agreed by the SC⁶ has been added accordingly to the Procedure Manual for Standard Setting⁷ and the IPPC Style Guide⁸.

III. Proposed changes to Diagnostic Protocols and Phytosanitary Treatments

10. Regarding diagnostic protocols (DPs), the SC considered that Appendix 2 of ISPM 27 could be deleted as the adopted DPs will be listed directly along with other ISPMs (in the *List of adopted*

³ See section 9.3 of the May 2014 SC meeting and section 4.3 of the November 2014 SC meeting: <https://www.ippc.int/core-activities/standards-setting/standards-committee>

⁴ <https://www.ippc.int/core-activities/governance/standards-setting/ispm/language-review-groups>

⁵ See section 4.3 of the November 2014 SC meeting: <https://www.ippc.int/core-activities/standards-setting/standards-committee>

⁶ See section 4.3 of the November 2014 SC meeting: <https://www.ippc.int/core-activities/standards-setting/standards-committee>

⁷ See section 4.7 of the 2014 Procedure Manual for standard setting available at: <https://www.ippc.int/core-activities/ippc-standard-setting-procedure-manual>

⁸ See sections 2.1 and 10.3 of the IPPC Style Guide for standards and meeting documents available at: <https://www.ippc.int/core-activities/standards-setting>

standards, available on the IPP⁹). Regarding phytosanitary treatments (PTs), the SC considered that Appendix 1 of ISPM 28 could also be deleted as all the information needed is posted on the IPP until a database on phytosanitary treatments is further considered. Minor adjustments may be needed to the text of ISPMs 27 and 28 as well as individual DPs and PTs to reflect these changes.

IV. ISPMs in force after application of the changes and mechanism

11. After the changes and mechanism described above have been applied, it will be clarified that the latest versions of ISPMs which are available on the “adopted ISPMs” main page of the IPP¹⁰ are the ones in force.

V. Recommendations

12. The CPM is invited to:

- 1) *adopt* the elimination of Appendix 2 to ISPM 27 and Appendix 1 to ISPM 28 (which will be maintained separately by the IPPC Secretariat and posted on the IPP until it can be replaced by a database) and note that ISPM 27 and ISPM 28 will have minor adjustments to reflect the removal of these two appendices.
- 2) *note* ink amendments (Attachment 1 to this paper).
- 3) *agree* that once the Secretariat has applied the changes mentioned above, all previous versions of ISPMs are revoked and replaced by the newly adopted or noted versions.

⁹ : <https://www.ippc.int/core-activities/standards-setting/ispms>

¹⁰ <https://www.ippc.int/core-activities/standards-setting/ispms>

Attachment 1

Replacement and revocation of old versions of ISPMs: proposed ink amendments (adjustments of content in ISPMs)

At the beginning of the column “reasons”, between square brackets, are indicated the ISPMs cross-referred in the paragraph that have been revised, or are under revision, to mark clearly which cross-references need to be changed to allow replacement of old versions, which ones will come up soon, and others.

ISPM	No.	Location of reference	Ref.ISPM	Current text	Proposed revision	Reasons
		ISPM 5		Glossary of Phytosanitary Terms		
5	1.	References		<p>CBD. 2000. <i>Cartagena Protocol on Biosafety to the Convention on Biological Diversity</i>. Montreal, CBD.</p> <p>CEPM. 1996. <i>Report of the Third Meeting of the FAO Committee of Experts on Phytosanitary Measures, Rome, 13–17 May 1996</i>. Rome, IPPC, FAO.</p> <p>— 1999. <i>Report of the Sixth Meeting of the Committee of Experts on Phytosanitary Measures, Rome, Italy: 17–21 May 1999</i>. Rome, IPPC, FAO.</p> <p>CPM. 2007. <i>Report of the Second Session of the Commission on Phytosanitary Measures, Rome, 26–30 March 2007</i>. Rome, IPPC, FAO.</p> <p>— 2008. <i>Report of the Third Session of the Commission on Phytosanitary Measures, Rome, 7–11 April 2008</i>. Rome, IPPC, FAO.</p> <p>— 2009. <i>Report of the Fourth Session of the Commission on Phytosanitary Measures, Rome, 30 March–3 April 2009</i>. Rome, IPPC, FAO.</p> <p>— 2010. <i>Report of the Fifth Session of the Commission on Phytosanitary Measures, Rome, 22–26 March 2010</i>. Rome, IPPC, FAO.</p> <p>— 2012. <i>Report of the Seventh Session of the Commission on Phytosanitary Measures, Rome, 19–23 March 2012</i>. Rome, IPPC, FAO.</p> <p>FAO. 1990. FAO Glossary of phytosanitary terms. <i>FAO Plant Protection Bulletin</i>, 38(1): 5–23. [current equivalent: ISPM 5]</p> <p>FAO. 1995. See ISPM 5:1995.</p> <p>ICPM. 1998. <i>Report of the Interim Commission on Phytosanitary Measures, Rome, 3–6 November 1998</i>. Rome, IPPC, FAO.</p>	<p><u>The references below correspond to the approval of terms and definitions, as indicated in the definitions. For ISPMs, they do NOT indicate the most recent version (which is available on the IPP at https://www.ippc.int/core-activities/standards-setting/ispms)</u></p> <p>CBD. 2000. <i>Cartagena Protocol on Biosafety to the Convention on Biological Diversity</i>. Montreal, CBD.</p> <p>CEPM. 1996. <i>Report of the Third Meeting of the FAO Committee of Experts on Phytosanitary Measures, Rome, 13–17 May 1996</i>. Rome, IPPC, FAO.</p> <p>— <u>1997. <i>Report of the Fourth Meeting of the FAO Committee of Experts on Phytosanitary Measures, Rome, 6–10 October 1997</i>. Rome, IPPC, FAO.</u></p> <p>— 1999. <i>Report of the Sixth Meeting of the Committee of Experts on Phytosanitary Measures, Rome, Italy: 17–21 May 1999</i>. Rome, IPPC, FAO.</p> <p>CPM. 2007. <i>Report of the Second Session of the Commission on Phytosanitary Measures, Rome, 26–30 March 2007</i>. Rome, IPPC, FAO.</p> <p>— 2008. <i>Report of the Third Session of the Commission on Phytosanitary Measures, Rome, 7–11 April 2008</i>. Rome, IPPC, FAO.</p> <p>— 2009. <i>Report of the Fourth Session of the Commission on Phytosanitary Measures, Rome, 30 March–3 April 2009</i>. Rome, IPPC, FAO.</p> <p>— <u>2010. <i>Report of the Fifth Session of the Commission on Phytosanitary Measures, Rome, 22–26 March 2010</i>. Rome, IPPC, FAO.</u></p>	<p>The reference section of ISPM 5 lists only sources of approval of terms and definitions (those indicated between [] at the end of the definitions). Standards referred to in supplements and annex 1 are referenced in those.</p> <p>It is proposed that all sources are maintained here, and that this does not prevent replacement of old versions that have been revised (e.g. ISPMs 11 and 15). However, some adjustments are proposed:</p> <ul style="list-style-type: none"> - a paragraph to clarify the nature of the references - this section was not consistently updated when terms were deleted. Several references to CPM, ICPM or ISPMs are not anymore in ISPM 5 and were deleted. - the mention that a standard was revised is not relevant as this list is only about sources of adoption. Such mentions were deleted - A few references were missing and were added. <p>Note: It would not make sense to refer to ISPMs collectively in this case. An alternative would have been to delete the references and decide what to do with the sources indicated between square brackets in each definition. However, these are believed to be useful and this alternative has not been retained.</p>

ISPM	No.	Location of reference	Ref.ISPM	Current text	Proposed revision	Reasons
				<p>— 2001. <i>Report of the Third Interim Commission on Phytosanitary Measures, Rome, 2–6 April 2001</i>. Rome, IPPC, FAO.</p> <p>— 2002. <i>Report of the Fourth Interim Commission on Phytosanitary Measures, Rome, 11–15 March 2002</i>. Rome, IPPC, FAO.</p> <p>— 2003. <i>Report of the Fifth Interim Commission on Phytosanitary Measures, Rome, 07–11 April 2003</i>. Rome, IPPC, FAO.</p> <p>— 2004. <i>Report of the Sixth Interim Commission on Phytosanitary Measures, Rome, 29 March–02 April 2004</i>. Rome, IPPC, FAO.</p> <p>— 2005. <i>Report of the Seventh Interim Commission on Phytosanitary Measures, Rome, 4–7 April 2005</i>. Rome, IPPC, FAO.</p> <p>IPPC. 1997. <i>International Plant Protection Convention</i>. Rome, IPPC, FAO.</p> <p>ISO/IEC. 1991. <i>ISO/IEC Guide 2:1991, General terms and their definitions concerning standardization and related activities</i>. Geneva, International Organization for Standardization, International Electrotechnical Commission.</p> <p>ISPM 2. 1995. <i>Guidelines for pest risk analysis</i>. Rome, IPPC, FAO. [published 1996] [revised; now ISPM 2: 2007]</p> <p>ISPM 2. 2007. <i>Framework for pest risk analysis</i>. Rome, IPPC, FAO.</p> <p>ISPM 3. 1995. <i>Code of conduct for the import and release of exotic biological control agents</i>. Rome, IPPC, FAO. [published 1996] [revised; now ISPM 3: 2005]</p> <p>ISPM 3. 2005. <i>Guidelines for the export, shipment, import and release of biological control agents and other beneficial organisms</i>. Rome, IPPC, FAO.</p> <p>ISPM 4. 1995. <i>Requirements for the establishment of pest free areas</i>. Rome, IPPC, FAO. [published 1996]</p> <p>ISPM 5. 1995. <i>Glossary of phytosanitary terms</i>. Rome, IPPC, FAO. [published 1996]</p>	<p>— 2012. <i>Report of the Seventh Session of the Commission on Phytosanitary Measures, Rome, 19–23 March 2012</i>. Rome, IPPC, FAO.</p> <p>FAO. 1990. FAO Glossary of phytosanitary terms. <i>FAO Plant Protection Bulletin</i>, 38(1): 5–23. [current equivalent: ISPM 5]</p> <p>FAO. 1995. See ISPM 5:1995.</p> <p>ICPM. 1998. <i>Report of the Interim Commission on Phytosanitary Measures, Rome, 3–6 November 1998</i>. Rome, IPPC, FAO.</p> <p>— 2001. <i>Report of the Third Interim Commission on Phytosanitary Measures, Rome, 2–6 April 2001</i>. Rome, IPPC, FAO.</p> <p>— 2002. <i>Report of the Fourth Interim Commission on Phytosanitary Measures, Rome, 11–15 March 2002</i>. Rome, IPPC, FAO.</p> <p>— 2003. <i>Report of the Fifth Interim Commission on Phytosanitary Measures, Rome, 07–11 April 2003</i>. Rome, IPPC, FAO.</p> <p>— 2004. <i>Report of the Sixth Interim Commission on Phytosanitary Measures, Rome, 29 March–02 April 2004</i>. Rome, IPPC, FAO.</p> <p>— 2005. <i>Report of the Seventh Interim Commission on Phytosanitary Measures, Rome, 4–7 April 2005</i>. Rome, IPPC, FAO.</p> <p>IPPC. 1997. <i>International Plant Protection Convention</i>. Rome, IPPC, FAO.</p> <p>ISO/IEC. 1991. <i>ISO/IEC Guide 2:1991, General terms and their definitions concerning standardization and related activities</i>. Geneva, International Organization for Standardization, International Electrotechnical Commission.</p> <p>ISPM 2. 1995. <i>Guidelines for pest risk analysis</i>. Rome, IPPC, FAO. [published 1996] [revised; now ISPM 2: 2007]</p> <p>ISPM 2. 2007. <i>Framework for pest risk analysis</i>. Rome, IPPC, FAO.</p> <p>ISPM 3. 1995. <i>Code of conduct for the import and</i></p>	

ISPM	No.	Location of reference	Ref.ISPM	Current text	Proposed revision	Reasons
				<p>ISPM 6. 1997. <i>Guidelines for surveillance</i>. Rome, IPPC, FAO.</p> <p>ISPM 7. 1997. <i>Export certification system</i>. Rome, IPPC, FAO.</p> <p>ISPM 8. 1998. <i>Determination of pest status in an area</i>. Rome, IPPC, FAO.</p> <p>ISPM 9. 1998. <i>Guidelines for pest eradication programmes</i>. Rome, IPPC, FAO.</p> <p>ISPM 10. 1999. <i>Requirements for the establishment of pest free places of production and pest free production sites</i>. Rome, IPPC, FAO.</p> <p>ISPM 11. 2001. <i>Pest risk analysis for quarantine pests</i>. Rome, IPPC, FAO. [revised; now ISPM 11:2004]</p> <p>ISPM 11. 2004. <i>Pest risk analysis for quarantine pests including analysis of environmental risks and living modified organisms</i>. Rome, IPPC, FAO.</p> <p>ISPM 12. 2001. <i>Guidelines for phytosanitary certificates</i>. Rome, IPPC, FAO.</p> <p>ISPM 13. 2001. <i>Guidelines for the notification of non-compliance and emergency action</i>. Rome, IPPC, FAO.</p> <p>ISPM 14. 2002. <i>The use of integrated measures in a systems approach for pest risk management</i>. Rome, IPPC, FAO.</p> <p>ISPM 15. 2002. <i>Guidelines for regulating wood packaging material in international trade</i>. Rome, IPPC, FAO. [revised; now ISPM 15:2009]</p> <p>ISPM 16. 2002. <i>Regulated non-quarantine pests: concept and application</i>. Rome, IPPC, FAO.</p> <p>ISPM 18. 2003. <i>Guidelines for the use of irradiation as a phytosanitary measure</i>. Rome, IPPC, FAO.</p> <p>ISPM 20. 2004. <i>Guidelines for a phytosanitary import regulatory system</i>. Rome, IPPC, FAO.</p> <p>ISPM 22. 2005. <i>Requirements for the establishment of areas of low pest prevalence</i>. Rome, IPPC, FAO.</p> <p>ISPM 23. 2005. <i>Guidelines for inspection</i>. Rome, IPPC, FAO.</p> <p>ISPM 24. 2005. <i>Guidelines for the determination and recognition of equivalence of phytosanitary</i></p>	<p>release of exotic biological control agents. Rome, IPPC, FAO. [published 1996] [revised; now ISPM 3: 2005]</p> <p>ISPM 3. 2005. <i>Guidelines for the export, shipment, import and release of biological control agents and other beneficial organisms</i>. Rome, IPPC, FAO.</p> <p>ISPM 4. 1995. <i>Requirements for the establishment of pest free areas</i>. Rome, IPPC, FAO. [published 1996]</p> <p>ISPM 5. 1995. <i>Glossary of phytosanitary terms</i>. Rome, IPPC, FAO. [published 1996]</p> <p>ISPM 6. 1997. <i>Guidelines for surveillance</i>. Rome, IPPC, FAO.</p> <p>ISPM 7. 1997. <i>Export certification system</i>. Rome, IPPC, FAO.</p> <p>ISPM 8. 1998. <i>Determination of pest status in an area</i>. Rome, IPPC, FAO.</p> <p>ISPM 9. 1998. <i>Guidelines for pest eradication programmes</i>. Rome, IPPC, FAO.</p> <p>ISPM 10. 1999. <i>Requirements for the establishment of pest free places of production and pest free production sites</i>. Rome, IPPC, FAO.</p> <p>ISPM 11. 2001. <i>Pest risk analysis for quarantine pests</i>. Rome, IPPC, FAO. [revised; now ISPM 11:2004]</p> <p>ISPM 11. 2004. <i>Pest risk analysis for quarantine pests including analysis of environmental risks and living modified organisms</i>. Rome, IPPC, FAO.</p> <p>ISPM 12. 2001. <i>Guidelines for phytosanitary certificates</i>. Rome, IPPC, FAO.</p> <p>ISPM 13. 2001. <i>Guidelines for the notification of non-compliance and emergency action</i>. Rome, IPPC, FAO.</p> <p>ISPM 14. 2002. <i>The use of integrated measures in a systems approach for pest risk management</i>. Rome, IPPC, FAO.</p> <p>ISPM 15. 2002. <i>Guidelines for regulating wood packaging material in international trade</i>. Rome, IPPC, FAO. [revised; now ISPM 15:2009]</p>	

ISPM	No.	Location of reference	Ref.ISPM	Current text	Proposed revision	Reasons
				<p><i>measures</i>. Rome, IPPC, FAO.</p> <p>ISPM 25. 2006. <i>Consignments in transit</i>. Rome, IPPC, FAO.</p> <p>ISPM 27. 2006. <i>Diagnostic protocols for regulated pests</i>. Rome, IPPC, FAO.</p> <p>ISPM 28. 2007. <i>Phytosanitary treatments for regulated pests</i>. Rome, IPPC, FAO.</p> <p>WTO. 1994. <i>Agreement on the Application of Sanitary and Phytosanitary Measures</i>. Geneva, World Trade Organization.</p>	<p>ISPM 16. 2002. <i>Regulated non-quarantine pests: concept and application</i>. Rome, IPPC, FAO.</p> <p>ISPM 17. 2002. <i>Pest reporting</i>. Rome, IPPC, FAO.</p> <p>ISPM 18. 2003. <i>Guidelines for the use of irradiation as a phytosanitary measure</i>. Rome, IPPC, FAO.</p> <p>ISPM 20. 2004. <i>Guidelines for a phytosanitary import regulatory system</i>. Rome, IPPC, FAO.</p> <p>ISPM 22. 2005. <i>Requirements for the establishment of areas of low pest prevalence</i>. Rome, IPPC, FAO.</p> <p>ISPM 23. 2005. <i>Guidelines for inspection</i>. Rome, IPPC, FAO.</p> <p>ISPM 24. 2005. <i>Guidelines for the determination and recognition of equivalence of phytosanitary measures</i>. Rome, IPPC, FAO.</p> <p>ISPM 25. 2006. <i>Consignments in transit</i>. Rome, IPPC, FAO.</p> <p>ISPM 27. 2006. <i>Diagnostic protocols for regulated pests</i>. Rome, IPPC, FAO.</p> <p>ISPM 28. 2007. <i>Phytosanitary treatments for regulated pests</i>. Rome, IPPC, FAO.</p> <p>WTO. 1994. <i>Agreement on the Application of Sanitary and Phytosanitary Measures</i>. Geneva, World Trade Organization.</p>	
ISPM 7 Phytosanitary certification system						
7	2.	3.2 Information on phytosanitary import requirements	20	Phytosanitary certification should be based on official information from the importing country. The NPPO of the exporting country should, to the extent possible, have available current official information concerning the phytosanitary import requirements of relevant importing countries. Such information should be made available in accordance with Article VII.2(b), VII.2(d) and VII.2(i) of the IPPC and ISPM 20:2004, section 5.1.9.2.	Phytosanitary certification should be based on official information from the importing country. The NPPO of the exporting country should, to the extent possible, have available current official information concerning the phytosanitary import requirements of relevant importing countries. Such information should be made available in accordance with Article VII.2(b), VII.2(d) and VII.2(i) of the IPPC and ISPM 20 (elements on dissemination of established regulations):2004, section 5.1.9.2.	Specific cross-reference. Proposal refers to the content of the section, which is likely to still be in the standard even if ISPM 20 is revised, rather to the section number.
ISPM 8 Determination of pest status in an area						
8	3.	Appendix 1, Useful references, under "Nomenclature, Terminology and General Taxonomy"	5	ISPM 5. <i>Glossary of phytosanitary terms</i> . Rome, IPPC, FAO. (Arabic/Chinese/ English/French/Spanish)	ISPM 5. <i>Glossary of phytosanitary terms</i> . Rome, IPPC, FAO. (Arabic/Chinese/ English/French/Spanish/ Russian)	In this specific case, the reference is useful and Russian should be added

ISPM	No.	Location of reference	Ref.ISPM	Current text	Proposed revision	Reasons
ISPM 11 Pest risk analysis for quarantine pests						
11	4.	2.1.1.3 Regulatory status, 2nd parag.	5 Suppl 1 (previous)	S1 Official control of pests presenting an environmental risk may involve agencies other than the NPPO. However, it is recognized that ISPM 5 Supplement 1 (<i>Guidelines on the interpretation and application of the concept of official control for regulated pests</i>), in particular section 5.7, applies.	S1 Official control of pests presenting an environmental risk may involve agencies other than the NPPO. However, it is recognized that ISPM 5 Supplement 1 (<i>Guidelines on the interpretation and application of the concepts of "official control" and "not widely distributed"</i>); in particular section 5.7, applies, <u>in particular its provisions regarding NPPO authority and involvement in official control.</u>	[ISPMs revised since: Suppl. 1] Supplement 1 to ISPM 5 was revised in 2012. The title and the structure changed. Section 5.7 became section 2.7, but kept the same content and title. It is proposed to refer to the title (reflecting the content) rather than section numbers.
ISPM 15 Regulation of wood packaging material in international trade						
15	5.	4.6 Phytosanitary measures for non-compliance at point of entry, 1st parag.	13, 20	- Relevant information on non-compliance and emergency action is provided in sections 5.1.6.1 to 5.1.6.3 of ISPM 20:2004, and in ISPM 13:2001. Taking into account the frequent re-use of wood packaging material, NPPOs should consider that the non-compliance identified may have arisen in the country of production, repair or remanufacture, rather than in the country of export or transit.	- Relevant information on non-compliance and emergency action is provided in sections 5.1.6.1 to 5.1.6.3 of ISPM 20:2004, and in ISPM 13: 2001 . Taking into account the frequent re-use of wood packaging material, NPPOs should consider that the non-compliance identified may have arisen in the country of production, repair or remanufacture, rather than in the country of export or transit.	General cross-reference to ISPM 13, on notification of non-compliance and emergency action. However, in ISPM 20, "non-compliance and emergency actions" is the title of section 5.1.6. Sections 5.1.6.1 to 5.1.6.3 deal with actions in case of non-compliance, emergency action, reporting of non-compliance and emergency action. Apparently ISPM 15 did not mean to refer to section 5.1.6.4 of ISPM 20 (Withdrawal or modification of phytosanitary regulation). Deletion of the section numbers is proposed, as the information referred to is easy to find in ISPM 20.
ISPM 19 Guidelines on lists of regulated pests						
19	6.	1. Basis for Lists of Regulated Pests, 4th parag.	12 (previous)	The availability of lists of regulated pests assists exporting contracting parties to issue phytosanitary certificates correctly. In instances where a list of regulated pests is not supplied by the importing contracting party, the exporting contracting party can only certify for pests it believes to be of regulatory concern (see ISPM 12:2001, section 2.1).	The availability of lists of regulated pests assists exporting contracting parties to issue phytosanitary certificates correctly. In instances where a list of regulated pests is not supplied by the importing contracting party, the exporting contracting party can only certify for pests it believes to be of phytosanitary regulatory concern (see ISPM 12 <u>in relation to certifying statements:2001, section 2.1</u>).	[ISPMs revised since: 12] Specific cross-reference. "Regulatory concern" was changed to "phytosanitary concern" when ISPM 12 was revised, and is adjusted here for consistency. A specific reference would be helpful as it relates to one item in ISPM 12. However, the section number (previously 2.1, now 5) is not helpful, as it is a long section, and a reference to the certifying statement was added
ISPM 22 Requirements for the establishment of areas of low pest prevalence						
22	7.	3.1.4.3 Reducing the risk of entry of specified pest(s), 1st parag.	20	In cases where an ALPP is established for a regulated pest, phytosanitary measures may be required to reduce the risk of entry of the specified pests into the ALPP (ISPM 20:2004). These may include:	In cases where an ALPP is established for a regulated pest, phytosanitary measures may be required to reduce the risk of entry of the specified pests into the ALPP (ISPM 20:2004). These may include:	The reference seems superfluous as it is not clear which aspect of ISPM 20 it refers to (ISPM 20 does not deal with this directly, and it is ISPM 22 which is making requirements

ISPM	No.	Location of reference	Ref.ISPM	Current text	Proposed revision	Reasons
						for ALPPs).
22	8.	3.3 Change in the status of an area of low pest prevalence, last parag.	17	If the ALPP is being used for export purposes, the importing country may require that such situations and associated activities are reported to it. Additional guidance is provided by ISPM 17:2002. Furthermore, a corrective action plan may be agreed to between the importing and exporting countries.	If the ALPP is being used for export purposes, the importing country may require that such situations and associated activities are reported to it. Additional guidance is provided by ISPM 17: 2002 in the section on other pest reports . Furthermore, a corrective action plan may be agreed to between the importing and exporting countries.	It is unclear what this refers to, or what guidance is provided by ISPM 17. The only section that seem to relate to this aspect is about "other pest reports", which comes after all the other aspects of "obligatory" pest reporting. If this is the case, then lack of specific cross-reference makes it difficult to understand what is meant.
ISPM 26 Establishment of pest free areas for fruit flies (Tephritidae)						
26	9.	4th parag.	8	In areas where the fruit flies concerned are not capable of establishment because of climatic, geographical or other reasons, absence should be recognized according to the first paragraph of section 3.1.2 of ISPM 8:1998. If, however, the fruit flies are detected and can cause economic damage during a season (Article VII.3 of the IPPC), corrective actions should be applied in order to allow the maintenance of a FF-PFA.	In areas where the fruit flies concerned are not capable of establishment because of climatic, geographical or other reasons, there should be no records of presence and it may be reasonable to conclude that the pest is absent ce should be recognized according to the first paragraph of section 3.1.2 of (ISPM 8):1998 . If, however, the fruit flies are detected and can cause economic damage during a season (Article VII.3 of the IPPC), corrective actions should be applied in order to allow the maintenance of a FF-PFA.	[ISPMs under revision: 8] Specific cross-reference, not clear as such, nor how it relates to the second paragraph of the section mentioned. To avoid the specific reference, some rewording is proposed, adapted from the first paragraph of section 3.1.2 of ISPM 8. The section is likely to change in the revised ISPM 8, but the general concept will probably remain (i.e. reasonable to conclude that the pest is absent when there are no records of presence in general surveillance data) – if not, this standard will need to be changed.
26	10.	5th parag.	8	In areas where the fruit flies are capable of establishment and known to be absent, general surveillance in accordance with section 3.1.2 of ISPM 8:1998 is normally sufficient for the purpose of delimiting and establishing a pest free area. Where appropriate, import requirements and/or domestic movement restrictions against the introduction of the relevant fruit fly species into the area may be required to maintain the area free from the pest.	In areas where the fruit flies are capable of establishment and known to be absent, general surveillance in accordance with section 3.1.2 of ISPM 8:1998 is normally sufficient for the purpose of delimiting and establishing a pest free area. Where appropriate, import requirements and/or domestic movement restrictions against the introduction of the relevant fruit fly species into the area may be required to maintain the area free from the pest.	[ISPMs under revision: 8] Specific cross-reference to absence/general surveillance in ISPM 8. The section that mentions general surveillance in ISPM 8 is easy to find, and therefore does not need to be mentioned.
ISPM 27 Diagnostic protocols for regulated pests						
27	11.	APPENDIX 2				It is proposed that this appendix be deleted (see main text)
ISPM 28 Phytosanitary treatments for regulated pests						
28	12.	APPENDIX 1				It is proposed that this appendix be deleted (to be maintained by the Secretariat on the IPP – see main text)

ISPM	No.	Location of reference	Ref.ISPM	Current text	Proposed revision	Reasons
ISPM 29 Recognition of pest free areas and areas of low pest prevalence						
29	13.	1. General Considerations, parag. 2 to 7	1, 4, 8, 10, 22, 26	<p>ISPM 1:2006 includes operational principles on recognition of PFAs and ALPPs (sections 2.3 and 2.14). ISPM 4:1995 points out that, since certain PFAs are likely to involve an agreement between trading partners, their implementation would need to be reviewed and evaluated by the national plant protection organization (NPPO) of the importing country (section 2.3.4).</p> <p>ISPM 8:1998 provides guidance on the use of the phrase "pest free area declared" in pest records (section 3.1.2).</p> <p>ISPM 10:1999 describes the requirements for the establishment and use of pest free places of production and pest free production sites as risk management options for meeting phytosanitary requirements for the import of plants, plant products and other regulated articles.</p> <p>ISPM 22:2005 describes the requirements and procedures for the establishment of ALPPs for regulated pests in an area and, to facilitate export, for pests regulated by an importing country only. This includes the identification, verification, maintenance and use of those ALPPs.</p> <p>ISPM 26:2006 describes the requirements for the establishment and maintenance of PFAs for the economically important species in the family Tephritidae.</p>	<p>ISPM 1:2006 includes operational principles on recognition of PFAs and ALPPs <u>(and avoidance of undue delays)</u> (sections 2.3 and 2.14).</p> <p>ISPM 4:1995 points out that, since certain PFAs are likely to involve an agreement between trading partners, their implementation would need to be reviewed and evaluated by the national plant protection organization (NPPO) of the importing country (section 2.3.4).</p> <p>ISPM 8:1998 provides guidance on the use of the phrase "pest free area declared" in pest records <u>(section 3.1.2)</u>.</p> <p>ISPM 10:1999 describes the requirements for the establishment and use of pest free places of production and pest free production sites as risk management options for meeting phytosanitary requirements for the import of plants, plant products and other regulated articles.</p> <p>ISPM 22:2005 describes the requirements and procedures for the establishment of ALPPs for regulated pests in an area and, to facilitate export, for pests regulated by an importing country only. This includes the identification, verification, maintenance and use of those ALPPs.</p> <p>ISPM 26:2006 describes the requirements for the establishment and maintenance of PFAs for the economically important species in the family Tephritidae.</p>	<p>[ISPMs under revision: 4, 8] Specific cross-references, but likely to remain valid even if ISPM 1 is revised (except for section number). Section 2.14 is about avoidance of undue delay, and it would be clearer to indicate this. Principles are easy to locate in the standard</p> <p>Specific cross-reference to ISPM 4, but quite general</p> <p>Specific cross-reference to one status in ISPM 8. Needed here (but may need to be changed when ISPM 8 is revised). Section number is not needed</p> <p>General cross-references to ISPM 10, 22 and ISPM 26</p>
29	14.	2.1 Recognition of pest free areas and areas of low pest prevalence	1	ISPM 1:2006 states that "contracting parties should ensure that their phytosanitary measures concerning consignments moving into their territories take into account the status of areas, as designated by the NPPOs of the exporting countries. These may be areas where a regulated pest does not occur or occurs with low prevalence or they may be pest free production sites or pest free places of production".	ISPM 1:2006 states that "e Contracting parties should ensure that their phytosanitary measures concerning consignments moving into their territories take into account the status of areas, as designated by the NPPOs of the exporting countries. These may be areas where a regulated pest does not occur or occurs with low prevalence or they may be pest free production sites or pest free places of production" (ISPM 1) .	[ISPMs revised since: 1] Although there is a specific cross-reference, in this case it is proposed to leave some text in the standard but not as a quote.
29	15.	3. Requirements for the Recognition of Pest Free Areas and Areas of Low Pest Prevalence, 4th parag.	8	Where the pest is absent from an area and the PFA status can easily be determined (for example in areas where no records of the pest have been made and, in addition, long-term absence of the pest is known or absence is confirmed by surveillance), the process for recognition described in this standard (in section 4) may not be required or very little supporting information may be necessary. In such cases, absence of the pest should be recognized according to the first paragraph of section	Where the pest is absent from an area and the PFA status can easily be determined (for example in areas where no records of the pest have been made and, in addition, long-term absence of the pest is known or absence is confirmed by surveillance), the process for recognition described in this standard (in section 4) may not be required or very little supporting information may be necessary. In such cases, absence of the pest should be recognized <u>(according to the first paragraph of section</u>	[ISPMs under revision: 8] Specific cross-reference to an element of ISPM 8, but the sentence on its own with the reference to ISPM 8 seems sufficient. It is expected that such approach will be possible also according to the revised ISPM 8.

ISPM	No.	Location of reference	Ref.ISPM	Current text	Proposed revision	Reasons
				3.1.2 of ISPM 8:1998 without the need for detailed information or elaborate procedures.	3.1.2 of ISPM 8:1998 without the need for detailed information or elaborate procedures.	
29	16.	5. Considerations on Pest Free Places of Production and Pest Free Production Sites, paragraphs 1 to 3	10	<p>Usually pest free places of production and pest free production sites should not require recognition using the procedures described above (section 4). In this regard ISPM 10:1999 states, for such places and sites, “The issuance of a phytosanitary certificate for a consignment by the NPPO confirms that the requirements for a pest free place of production or a pest free production site have been fulfilled. The importing country may require an appropriate additional declaration on the phytosanitary certificate to this effect.” (section 3.2 of ISPM 10)</p> <p>However, ISPM 10 (in section 3.3) also indicates:</p> <p>The NPPO of the exporting country should, on request, make available to the NPPO of the importing country the rationale for establishment and maintenance of pest free places of production or pest free production sites. Where bilateral arrangements or agreements so provide, the NPPO of the exporting country should expeditiously provide information concerning establishment or withdrawal of pest free places of production or pest free production sites to the NPPO of the importing country.</p> <p>As described in ISPM 10 (section 3.1):</p> <p>When complex measures are needed to establish and maintain a pest free place of production or pest free production site, because the pest concerned requires a high degree of phytosanitary security, an operational plan may be needed. Where appropriate, such a plan would be based on bilateral agreements or arrangements listing specific details required in the operation of the system including the role and responsibilities of the producer and trader(s) involved.</p>	<p>Usually pest free places of production and pest free production sites should not require recognition using the procedures described above (section 4). In this regard ISPM 10:1999 <u>provides guidance states</u>, for such places and sites, “The issuance of a phytosanitary certificate for a consignment by the NPPO confirms that the requirements for a pest free place of production or a pest free production site have been fulfilled. The importing country may require an appropriate additional declaration on the phytosanitary certificate to this effect.” (section 3.2 of ISPM 10)</p> <p>However, ISPM 10 (in section 3.3) also indicates <u>that t</u></p> <p>The NPPO of the exporting country should, on request, make available to the NPPO of the importing country the rationale for establishment and maintenance of pest free places of production or pest free production sites. Where bilateral arrangements or agreements so provide, the NPPO of the exporting country should expeditiously provide information concerning establishment or withdrawal of pest free places of production or pest free production sites to the NPPO of the importing country.</p> <p>As <u>also</u> described in ISPM 10 (section 3.1), <u>when</u> complex measures are needed to establish and maintain a pest free place of production or pest free production site, because the pest concerned requires a high degree of phytosanitary security, an operational plan may be needed. Where appropriate, such a plan would be based on bilateral agreements or arrangements listing specific details required in the operation of the system including the role and responsibilities of the producer and trader(s) involved.</p>	<p>Specific cross-references to content of ISPM 10. The quotes provide a lot of information. Deleting them would remove some information, rephrasing may be paraphrasing. So it is suggested to take away the quotes and simply make stand alone statements.</p>
ISPM 30 Establishment of areas of low pest prevalence for fruit flies (Tephritidae)						
30	17.	1.2 Determination of an FF-ALPP, 2nd parag.	8	In areas where prevalence of fruit flies is naturally at a low level because of climatic, geographical or other reasons (e.g. natural enemies, availability of suitable hosts, host seasonality), the target fruit fly population may already be below the specified level of low pest prevalence without applying any control measures. In such cases,	In areas where prevalence of fruit flies is naturally at a low level because of climatic, geographical or other reasons (e.g. natural enemies, availability of suitable hosts, host seasonality), the target fruit fly population may already be below the specified level of low pest prevalence without applying any control measures. In	[ISPMs under revision: 8] Specific cross-reference. While the section number will probably change in the revised ISPM 8, it is expected that examples (or recommendations) for pest status of presence will still be given, and it is also

ISPM	No.	Location of reference	Ref.ISPM	Current text	Proposed revision	Reasons
				surveillance should be undertaken over an appropriate length of time to validate the low prevalence status and this status may be recognized in accordance with the examples listed in section 3.1.1 of ISPM 8:1998. If, however, the fruit flies are detected above the specified level of low pest prevalence (e.g. because of extraordinary climatic conditions) corrective actions should be applied. Guidelines for corrective action plans are provided in Annex 2.	such cases, surveillance should be undertaken over an appropriate length of time to validate the low prevalence status and this status may be recognized in accordance with the examples of pest statuses for presence in listed in section 3.1.1 of ISPM 8:1998 . If, however, the fruit flies are detected above the specified level of low pest prevalence (e.g. because of extraordinary climatic conditions) corrective actions should be applied. Guidelines for corrective action plans are provided in Annex 2.	assumed that there will be one for low prevalence. This will have to be corrected if it is not the case in the revised version. The change proposed does not change the concept or application of the ISPM, but introduces new words
ISPM 31 Methodologies for sampling of consignments						
	18.	1. Lot Identification, 1st parag.	23	A consignment may consist of one or more lots. Where a consignment comprises more than one lot, the inspection to determine compliance may have to consist of several separate visual examinations, and therefore the lots will have to be sampled separately. In such cases, the samples relating to each lot should be segregated and identified in order that the appropriate lot can be clearly identified if subsequent inspection or testing reveals non-compliance with phytosanitary requirements. Whether or not a lot will be inspected should be determined using factors stated in ISPM 23:2005 (section 1.5).	A consignment may consist of one or more lots. Where a consignment comprises more than one lot, the inspection to determine compliance may have to consist of several separate visual examinations, and therefore the lots will have to be sampled separately. In such cases, the samples relating to each lot should be segregated and identified in order that the appropriate lot can be clearly identified if subsequent inspection or testing reveals non-compliance with phytosanitary requirements. Whether or not a lot will be inspected should be determined using factors stated in ISPM 23:2005 (section 1.5 on other considerations for inspection).	Specific cross-reference. The concept is expected to remain in ISPM 23 even if revised.
31	19.	7. Outcome of Sampling	23	The outcome of activities and techniques related to sampling may result in phytosanitary action being taken (further details can be found in ISPM 23:2005, section 2.5).	The outcome of activities and techniques related to sampling may result in phytosanitary action being taken (further details can be found in ISPM 23 in relation to inspection outcome:2005, section 2.5).	Specific cross-reference. The wording used before the parenthesis did not exactly relate to the section in ISPM 23, and some additional words would be useful. Inspection outcome is expected to remain in ISPM 23.
ISPM 32 Categorization of commodities according to their pest risk						
32	20.	Background, 2nd parag.	11	Some intended uses of commodities (e.g. planting) result in a much higher probability of introducing pests than others (e.g. processing) (further information is contained in ISPM 11:2004, section 2.2.1.5).	Some intended uses of commodities (e.g. planting) result in a much higher probability of introducing pests than others (e.g. processing) (further information is contained in ISPM 11:2004, in relation to the probability of transfer to a suitable host section 2.2.1.5).	[ISPMs revised since: 11] Specific reference. This is not a straightforward reference. Words added
32	21.	Background, from 5th parag. onwards	11 (previous), 12 (previous), 15 (previous), 16, 20,	Article VI.1(b) of the IPPC states: "Contracting parties may require phytosanitary measures for quarantine pests and regulated non-quarantine pests, provided that such measures are ... limited to what is necessary to protect plant health and/or safeguard the intended use" This standard is based on the concepts of intended use of a commodity and the method and degree of its processing, which are also addressed in other ISPMs as outlined	Article VI.1(b) of the IPPC states: "Contracting parties may require phytosanitary measures for quarantine pests and regulated non-quarantine pests, provided that such measures are ... limited to what is necessary to protect plant health and/or safeguard the intended use" This standard is based on the concepts of intended use of a commodity and the method and degree of its processing, which are also addressed in other ISPMs as outlined	[ISPMs revised since: 11, 12, 15] This is probably the most difficult case in this analysis. It is important to find a solution, as otherwise the old versions of ISPMs 11, 12 and 15 cannot be replaced. Removing quotes entails extensive rewording, but simply adjusting the text to

ISPM	No.	Location of reference	Ref.ISPM	Current text	Proposed revision	Reasons
			21, 23	<p>below.</p> <p>Method and degree of processing:</p> <ul style="list-style-type: none"> - ISPM 12:2001, section 1.1, states: Importing countries should only require phytosanitary certificates for regulated articles. ... Phytosanitary certificates may also be used for certain plant products that have been processed where such products, by their nature or that of their processing, have a potential for introducing regulated pests (e.g. wood, cotton). ... Importing countries should not require phytosanitary certificates for plant products that have been processed in such a way that they have no potential for introducing regulated pests, or for other articles that do not require phytosanitary measures. - ISPM 15:2002, section 2, states: Wood packaging made wholly of wood-based products such as plywood, particle board, oriented strand board or veneer that have been created using glue, heat and pressure, or a combination thereof, should be considered sufficiently processed to have eliminated the risk associated with the raw wood. It is unlikely to be infested by raw wood pests during its use and therefore should not be regulated for these pests. - ISPM 23:2005, section 2.3.2, states: "Inspection can be used to verify the compliance with some phytosanitary requirements." Examples include degree of processing. <p>Intended use:</p> <ul style="list-style-type: none"> - ISPM 11:2004, sections 2.2.1.5 and 2.2.3. When analysing the probabilities of transfer of pests to a suitable host and of their spread after establishment, one of the factors to be considered is the intended use of the commodity. - ISPM 12:2001, section 2.1. Different phytosanitary requirements may apply to the different intended end uses as indicated on the phytosanitary certificate. - ISPM 16:2002, section 4.2. Risk of economically unacceptable impact varies with different pests, commodities and intended use. 	<p>below.</p> <p>Method and degree of processing:</p> <ul style="list-style-type: none"> - <u>ISPM 12. NPPOs of the importing countries should not require phytosanitary certificates for plant products that have been processed to the point where they have no potential for introducing regulated pests</u> - <u>ISPM 15. Low risk articles are exempted from the requirements in the standard due to the method and degree of processing.</u> - <u>ISPM 23. Inspection may be used to verify the degree of processing.</u> <p>ISPM 12:2001, section 1.1, states: Importing countries should only require phytosanitary certificates for regulated articles. ... Phytosanitary certificates may also be used for certain plant products that have been processed where such products, by their nature or that of their processing, have a potential for introducing regulated pests (e.g. wood, cotton). ... Importing countries should not require phytosanitary certificates for plant products that have been processed in such a way that they have no potential for introducing regulated pests, or for other articles that do not require phytosanitary measures.</p> <p>ISPM 15:2002, section 2, states: Wood packaging made wholly of wood-based products such as plywood, particle board, oriented strand board or veneer that have been created using glue, heat and pressure, or a combination thereof, should be considered sufficiently processed to have eliminated the risk associated with the raw wood. It is unlikely to be infested by raw wood pests during its use and therefore should not be regulated for these pests.</p> <p>ISPM 23:2005, section 2.3.2, states: "Inspection can be used to verify the compliance with some phytosanitary requirements." Examples include degree of processing.</p> <p>Intended use: ISPM 11:2004, sections 2.2.1.5 and 2.2.3. When analysing the probabilities of transfer of pests to a suitable host and of their spread after establishment, one of the factors to be considered is the intended use of the commodity. ISPM 12:2001, section 2.1. Different phytosanitary requirements may apply to the different intended end uses as indicated on the phytosanitary certificate. ISPM 16:2002, section 4.2. Risk of economically unacceptable impact varies with different pests, commodities and intended use.</p> <p><u>Intended use: - ISPM 11. The intended use is considered when analysing the probabilities of transfer of pests to a suitable host and of their spread after establishment.</u></p>	<p>quote the revised standards is not straightforward either.</p> <p>This proposed revision is more drastic than simply quoting the new revisions, but should avoid similar issues in the future.</p> <p>This revision does not take account of the fact that some ISPMs developed after ISPM 32 are also relevant (e.g. ISPM 36)</p>

ISPM	No.	Location of reference	Ref.ISPM	Current text	Proposed revision	Reasons
				<p>- ISPM 21:2004, which uses extensively the concept of intended use.</p> <p>Method and degree of processing together with intended use:</p> <p>- ISPM 20:2004, section 5.1.4, indicates that PRA may be done on a specific pest or on all the pests associated with a particular pathway (e.g. a commodity). A commodity may be classified by its degree of processing and/or its intended use.</p> <p>- ISPM 23:2005, section 1.5. One of the factors to decide the use of inspection as a phytosanitary measure is the commodity type and intended use.</p>	<p>- ISPM 16. Risk of economically unacceptable impact varies with different pests, commodities and intended use.</p> <p>- ISPM 21. Uses the concept of intended use extensively.</p> <p>ISPM 11:2004, sections 2.2.1.5 and 2.2.3. When analysing the probabilities of transfer of pests to a suitable host and of their spread after establishment, one of the factors to be considered is the intended use of the commodity.</p> <p>ISPM 12:2001, section 2.1. Different phytosanitary requirements may apply to the different intended end uses as indicated on the phytosanitary certificate.</p> <p>ISPM 16:2002, section 4.2. Risk of economically unacceptable impact varies with different pests, commodities and intended use.</p> <p>ISPM 21:2004, which uses extensively the concept of intended use.</p> <p>Method and degree of processing together with intended use:</p> <p>- ISPM 12. Different phytosanitary requirements may apply to the different intended end uses or degree of processing as indicated on the phytosanitary certificate.</p> <p>- ISPM 20. A commodity may be classified by its degree of processing and/or its intended use.</p> <p>- ISPM 23. The commodity type and intended use are taken into account to decide the use of inspection as a phytosanitary measure.</p> <p>ISPM 20:2004, section 5.1.4, indicates that PRA may be done on a specific pest or on all the pests associated with a particular pathway (e.g. a commodity). A commodity may be classified by its degree of processing and/or its intended use.</p> <p>- ISPM 23:2005, section 1.5. One of the factors to decide the use of inspection as a phytosanitary measure is the commodity type and intended use.</p>	