Review of the Implementation of ISPM4

Cataloguing Challenges and Opportunities

International Plant Protection Convention (IPPC)
Food and Agriculture Organization of the United Nations
Via delle Terme di Caracalla 00153
Rome, Italy

March 2012

Implementation Review and Support System (IRSS)

Report on Activity carried out for ISPM No. 4 (1995): Requirements for the Establishment of Pest Free Areas

Background

Adopted by the Twenty-eighth Session of the FAO Conference in 1995, this standard describes the requirements for the establishment and use of pest free areas (PFAs) as a risk management option for phytosanitary certification of plants and plant products and other regulated articles exported from the PFA or to support the scientific justification for phytosanitary measures taken by an importing country for protection of an endangered PFA. The establishment and use of a PFA by a national plant protection organization (NPPO) provides for (i) the export of plants, plant products and other regulated articles from the country in which the area is situated (exporting country) to another country (importing country) without the need for application of additional phytosanitary measures when certain requirements are met. Thus the pest free status of an area may be used as the basis for the phytosanitary certification of plants, plants products, and other regulated articles with respect to the stated pest(s). It also provides (ii) as an element in pest risk assessment, the confirmation, on a scientific basis of the absence of a stated pest from an area. In 2011, the IPPC initiated the Implementation Review and Support System (IRSS) project which received instructions from the Standards Committee (SC) to analyze the implementation of ISPM4 with a view to identify possible amendments to the standard in an upcoming review.

The IRSS developed a "Mini-Questionnaire" that was administered to 177 Contracting Parties in the seven FAO regions and feedback was received from the following 28 Contracting Parties in the different regions as follows:

- i. Africa: Eritrea, Kenya, Mozambique, Mauritania, Senegal, South Africa
- ii. Asia: China, Laos, Philippines, Singapore
- iii. The Caribbean: St. Kitts

iv. Eastern Europe and Central Asia: Belarus, Czech Republic, Kyrgyzstan, Macedonia, Moldova, Uzbekistan

v. EU member states: Albania, Belgium, France, United Kingdom

vi. Latin America: Chile, Peru

vii. Near East: Morocco, Palestine, Syria, Tunisia, United Arab Emirates

viii. North America: 0

ix. South West Pacific: 0

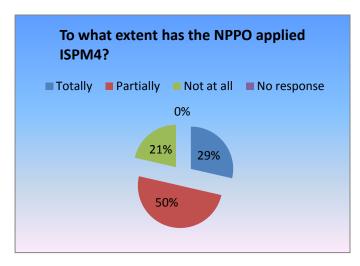
The questionnaire was also sent to Regional Plant Protection Organizations and shared with staff of the FAO. The questionnaires were also discussed by 107 Contracting Parties during 7 Regional Workshops on ISPM6 Pest Surveillance held in the period of January to February 2012.

Scope of the Questionnaire

The mini questionnaire focused on the use, challenges in implementation and potential areas for improvement of ISPM4. This report presents global information from the data captured by the brief IRSS study on ISPM4 and well as comments made on the standard during the IRSS ISPM6 Pest Surveillance Workshops mentioned above. Raw data from the questionnaires are presented in Annex I. Reports of the Regional Workshops are available on the IPP IRSS webpage here: https://www.ippc.int/index.php?id=1111059&L=0#irssactivities. The sections that follow present the analysis from a Global perspective, but regional differences may be significant and the Steward may wish to review those responses when developing specifications for the revision of the standard.

Extent of NPPO Application

The extent to which NPPO's have applied ISPM4 for those countries who participated in the ISPM4 mini-survey showed mixed results. While fifty percent of respondents indicated that their NPPO's applied ISPM4 "Partially", the other half of respondents were almost equally split in their response. Namely, 29% indicated that their NPPO's apply ISPM4 "Totally" whereas the other

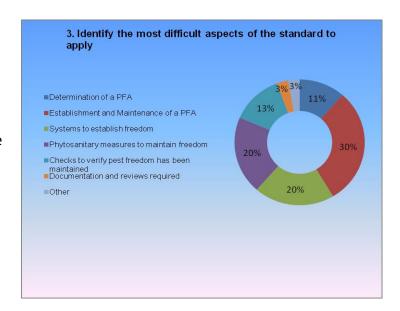


21% of respondents reported that their NPPO's were "not at all" applying ISPM4. For those respondents who indicated that they were only partially applying ISPM4 or not applying ISPM4, the top 3 reasons why they were only partially or not applying ISPM4 are:

- 1. Lack of financial resources
- 2. Weak domestic policy in place poor awareness on importance of PFAs among private and public sectors
- 3. Limited number of experts/low level of qualification and poor staffing levels

Difficulties in application

In regards to the identification of the most difficult aspects of ISPM4 to apply, the respondents indicated that (i) the establishment and maintenance of a Pest Free Area (PFA), (ii) phytosanitary measures to maintain freedom and (iii) systems to establish freedom were difficult to apply. It would appear that CP's have



fundamental problems for implementation of the core areas in the establishment of a Pest Free Area (PFA). It is unclear whether the reasons indicated in the previous section can account for these difficulties in implementation. However, the shortcomings indicated in the next section may be considered as key elements when developing new specifications for the revision of ISPM4.

Country Open-Ended Feedback

Compiled Suggested improvements for ISPM4

- Guidance towards the recognition of pest free areas (legal, technical and economic)
- Detailed and well articulated description of the process of establishment and maintenance of a PFA
- Inclusion of guidelines not only requirements
- Specific situations of each country i.e. Phytosanitary laws and regulations, legal support structures
- Greater focus on simple recognition of Pest Free status which cannot be established in an area or country i.e. Semi-tropical or tropical fruit flies cannot be established in temperate areas but some countries still require creation and maintenance of high cost measures to prove freedom before they will accept imports from that area
- Make a link with relevant ISPMs adopted or revised after the adoption of ISPM4 ie.
 ISPM6, ISPM8, ISPM9, ISPM11, ISPM17, ISPM19, ISPM26, and ISPM29
- Reference to public reporting for new pests as part of the checks for the pests involved in a PFA
- Regarding pest monitoring, there needs to be guidance on the time schedule for declaring pest freedom
- The usage of terms needs to be updated i.e. phytosanitary security
- A need for more information on the use of buffer zones
- Provision for a legal obligation to prevent or monitor the movement of commodities in the PFA
- The inclusion of public awareness campaigns

The following Tables provide country feedback categorized into thematic areas and provides for some suggestions actions based on the review findings and the Regional Pest Surveillance Workshop discussions held in January 2012, which also covered ISPM4.

Table 1: Reasons given by respondents on why ISPM4 is either partially or not implemented at all (Clustered into thematic areas):

Thematic Area	Country Feedback	IPPC Sec Recommendations
Policy/Legislation	 Policy issues - currently the policy on determination of authority changed with delineation of pest free areas not very clearly defined under the laws of Kenya: Implementation of the regulatory action and in particular - restriction of the movement of certain products within areas of a country or countries including buffer zones has not been easy to maintain due to policy limitations. this also applies to routine monitoring for diseases; Adhesion small farmers; Farmers; Absence of national legislation on protected or free areas; Political considerations; The responsibility of exports and imports had until short time ago rested on the (X country) side, so there were many obstacles; As a net importer of plants and plant products, and a export hub, maintenance of PFA in phenomenal; Legislation; Difficulty of restricting the movement of certain products within areas 	 Develop a model phytosanitary policy to guide development of subsequent phytosanitary and associated legal frameworks. Develop advocacy material for improved support by policy makers.
Trade Environment	 There was no commodity/pest of concern particularly intended for trade export; Use PFAs only through the EU concept of protected zones; Delimiting and monitoring surveys; Introduction of quarantine problem is limited and recent; The list of hosts of the pest in Tacna and Moqegua is little and easy to control, with support from the inter-American development bank is increasing the free areas elsewhere in the country as Ica, Arequipa, Lima, La Libertad, Ancash, etc.; The pest free area protocol still under discussion with the trade partners; Demand for other countries to plants or plant products concerned by these problems in absent; Limited export of plants, plant products, and other regulated materials of economic significance to warrant resources to conduct 	Prepare training materials / guidance based on the IPPC Market Access Manual.

	PFA surveys;	
Technical	 Lack of economic interest (complex trade) Modernization of techniques of survey; Technical justification to prove freedom from given harmful organisms; Lack of pest categorization into quarantine and regulated non quarantine pests due to inadequate surveillance data; Keeping free of certain harmful organisms; Lack of local national plant quarantine enforcement systems; Lack of an adequate early warning system to prevent entry and establishment of exotic pests; We are still conducting surveys to determine status (for fruit fly and Coconut Lethal Yellowing Disease); Currently, in the process of establishment i.e. Surveys; lack of historical and published data for systems to establish freedom; inadequate pest list records; Surveillance data verification 	Develop manuals and other technical resources as appropriate.
Operational Aspects	 Lack of regular surveillance to establish freedom; Difficulty in implementing such a program; Management focus; Mostly capacity development to maintain areas; Way of planting; Applying the old methods in controlling; There has been some use of PFA status in support of exports although possibly not explicitly referring to the ISPM; Some import provisions allow for recognition of PFA status, explicitly referring to the ISPMs or otherwise specifying "area freedom"; Weak domestic quarantine systems in the country 	 Develop appropriate guidance documents for practical implementation.
Economic/Financial	 Financial resources; Financial/budget constraints; Limited financial resources; Financial constraints; Deficiency of financial resources; Cost of surveillance; Expensive to maintain and develop; Lack of resources to carry out detection; 	 Develop advocacy material for improved funding particularly from national (particularly the private sector) and other sources. Develop advocacy material emphasizing the importance of public/private partnerships for successful implementation of

	Lack of resources to carry out pest eradication programmes;	the standard.
	 Budgetary constraints in fully undertaking the requirements of the ISPM, 4; Inadequacy of budget support; There are no specific resources allocated in terms of budget, trained 	
	manpower, etc; • Financings NPPO not up to the mark	
Human Resource Capacity	 Limited number of experts; Staffing levels not adequate to fully implement the standard; No capable human resource; Lack of expert staff; Manpower constraints; Limited resources to analyze historical data for establishment; Limited human resources; Expert qualifications; Weak technical base; Qualification of experts is insufficient for performance of tasks in view; No capable human resource; Lack of specialist within the concerned structures; Limited professional organization; Lack of adequate extension advice to producers 	 Consider development of specific training courses including appropriate course content; Seek partners and funding to develop these
Advocacy	 Missing awareness raising by political decision makers; Weak awareness on importance of PFA among public and private sectors 	 Develop advocacy material for improved support by policy makers and other stakeholders.
Coordination	 Absence of coordination between various participants (agriculture, trades, home department) for the preservation of PFA zones 	 Develop guidance instruments for better coordination mechanisms at national level
Physical Environment	 Geographical reasons (small country with a lot of imports); Two small volcanic islands in close proximity (essentially one ecological/climatic zone); Weather 	 Develop materials that showcase how other countries implement the Standard under similar circumstances.

Table 2: Pertinent aspects or situations experienced by NPPOs which are perceived NOT to have been covered by ISPM 4 (Clustered into thematic areas):

Thematic Areas	Country Feedback	IPPC Sec Recommendations
Institutional	Specific bilateral agreements;	 Develop materials that showcase how other countries establish bilateral agreements in this respect.
Guidance	 Set of guidance for the recognition of pest free areas (legal, technical and economic); Necessary to reinforce capacity in terms of the PRA Hard to understand the process of establishment and maintenance of a PFA. Guidelines are needed, not only the requirements; For eg. the surveillance of CLYD there is no international standard defined within the IPPC; The topics that have not been considered in ISPMs are specific situations of each country and it should be resolved individually, such as: phytosanitary laws and regulations, legal support structures, inter-cultural differences and economic or social conditions in the people; Certification for pest freedom for a commodity that is not grown here eg. potato cyst nematode, soybean cyst nematode and potato wart disease 	Develop manuals and other technical resources as appropriate.
Gaps	 The standard does not describe the boundaries of an area; The standard does not describe the inspection measures of the environment and at what level is the distance zoning applicable; It would also be interesting to see this standard address the possibilities for raising quarantine precise areas; Pertinent aspects of this ISPM relate to is 2.2 contaminated zone in an area; [RECOGNITION] We would like to see greater focus on simple recognition of pest free status for pests which cannot establish in an area or a country -eg. semi tropical or tropical fruit flies cannot be established in temperate areas but some countries still require creation and maintenance of high cost measures to prove freedom before they will accept imports from that area 	Communicated to the SC (April 2012)

Validation of Implementation	 It is expected that the current ISPM is comprehensive, but if we apply the requirements for establishment (PFA), expect to appear situation experienced [IPPC Sec Interpretation of this question: Has the standard been validated by any other NPPO?] 	 Document best practices Develop appropriate guidance documents for practical
		implementation.

Table 3: Additional guidance or tools NPPOs have suggested as necessary to better implement ISPM4 (Clustered into thematic areas):

Thematic Areas	Country Feedback	IPPC Sec Recommendations
Guidance Materials	 Guidance in documentation and review during the establishment and maintenance of a PFA; Guideline for establishment of PFA; Guidance about linking between the type of pest and minimum area that can be considered as PFA; Guidance about pest levels in adjacent areas to PFA; More resource materials on pest information and risk management techniques are also needed; National standard operating procedures on determining PFAs; Greater guidance on how to prove pest freedom and on a trading partners acceptance of that status would be useful, perhaps by reflecting some of the language used to that effect in ISPM29; There should be an article concerning capacity building for some countries; Studying information on plants of quarantine, pests on site, good work of the internet. 	Develop appropriate guidance documents for practical implementation.
Human/Financial Resources	 Need help in terms of budget; In Mauritania the primary limitation is the implementation of the standard due to the lack of numbers of qualified technicians; [ROI/CBA]The current measures tend to be high in costs in terms of surveillance and providing pest freedom, including in cases where pest establishments is not possible or could only be temporary 	 Develop advocacy material for improved funding particularly from national sources.
Legislation	 To results legal normative base in conformity to standards ISPM; establish a law governing this aspect; effective legislation such as provision for issuing on-the-spot fines for transgressors; policy is still a constraint in Kenya 	 Develop phytosanitary legal and policy guidance documents.
Capacity Development	Preparation of national experts;	 Consider

References	 trainings of all stakeholders and public sectors on the importance of maintenance of pest free areas; Trainings on surveillance and phytosanitary measures are needed; Training to strengthen domestic quarantine system; The guidance is adequate, however the issue of capacity; Practical implementation of standards; Practical case study and simulations IPPC Repository for surveillance data for declared pest free areas (currently its more on bilateral arrangements) that can be used by other countries;	development of specific training courses including appropriate course content; • Seek partners and funding to develop these • Identify technical assistance for skills development in the identified areas. • Explore practical ways to enable
	 A global host pest list for reference - CABI is not time sensitive; Pest alerts eg. Promed (plants) 	confirmatory identifications of pests.
Best Practices	The most important thing is a good understanding to our special methods which related with the program	 Document best practices Develop appropriate guidance documents for practical implementation.