



# **International Plant Protection Convention**

## **IMPLEMENTATION REVIEW AND SUPPORT SYSTEM (IRSS) TRIENNIAL IMPLEMENTATION REVIEW REPORT (2011- 2014)**

**March 2014**

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## FOREWORD

The generous support of the European Commission (EC) has allowed the Implementation Review and Support System (IRSS) to function on a project basis through its complete first cycle from April 2011 until March 2014. The project aims to review contracting parties' implementation of the IPPC and its standards and provide support to improve implementation.

## SECTION I. IPPC SECRETARY'S PREFACE

This report is the first comprehensive effort of the International Plant Protection Convention (IPPC) that tracks and monitors the IPPC's contracting parties' implementation of the Convention and its international standards for phytosanitary measures (ISPMs). Efforts of this kind demonstrate the IPPC embraces the culture of evaluation. The intention of this report is to more fully inform IPPC programming and decision-making in the future.

The report serves as a reference point to describe the current state of implementation of the IPPC and ISPMs by contracting parties, which should prove useful in tracking future progress and challenges as they arise. This monitoring and evaluation initiative is evidence that the IPPC is moving towards Results Framework Programming via the Implementation Review & Support System (IRSS) mechanism, along with the recently adopted [IPPC Strategic Framework for 2012-2019](#). It also follows the similar Results Framework programming trajectory that the Food and Agriculture Organisation of the United Nations (FAO), host of the IPPC, has been taking in recent years.

IPPC contracting parties – their governments, regional plant protection organisations (RPPOs), the private sector and partner multilateral organizations want to see results from the IPPC to understand how well plant protection systems are implementing ISPMs and consequently working towards preventing the introduction and spread of plant pests. It is incumbent that the IPPC demonstrates it is making a difference towards food security, trade facilitation, environmental protection and capacity development.

This report contains a synthesis of the IRSS outputs over the course of the first cycle of the three year project. Each year, the IRSS closely reviewed the implementation of selected ISPMs and in its final year of the first cycle the project generally reviewed contracting parties' implementation of all ISPMs and the IPPC. The report also includes a discussion on the overall nature of IRSS project, including its modalities and the linkages and programmatic impacts on relevant IPPC bodies, such as Standard Setting (SC), Capacity Development (CD), National Reporting Obligations (NROs) and the Subsidiary Body on Dispute Settlement (SBDS). Recommendations from the IRSS findings for the improvement of the IPPC and ISPM implementation are proposed to the Commission on Phytosanitary Measures (CPM), the governing body of the IPPC, for their consideration.

IPPC would like to thank the European Commission for its full support of the IRSS initiative, which for the first time has made it possible for the IPPC Secretariat to undertake this monitoring and evaluation exercise. IPPC would also like to thank national plant protection organizations (NPPO) contact points and staff, RPPOs, subsidiary body members and other direct and indirect contributors for their time, active participation and support of the IRSS project over the first three year cycle.

It is IPPC's intention that in the next IRSS work programme suitable indicators will be developed to regularly monitor and evaluate contracting parties' progress towards the objectives outlined in the [IPPC Strategic Framework for 2012–2019](#). It is IPPC's aspiration to clarify what higher level results we

want to achieve, to develop and act on evidence-based strategies to achieve these results. This will ultimately improve the ability of all contracting parties to successfully implement the IPPC and its ISPMs.

## SECTION II. INTRODUCTION

In 2007, an open-ended working group meeting on developing a possible IPPC compliance mechanism was held. It was agreed that a compliance process was contrary to the objectives and the philosophy of the CPM and the FAO and rather an implementation review and support system would suit better the needs of contracting parties.

As a result, the open-ended working group developed the IRSS, which built on existing, or planned processes already approved by the CPM with the primary objective of facilitating and promoting the implementation of the IPPC and the ISPMs. The end goal of the system would be to help in avoiding future disputes between contracting parties. Expected benefits also include the ability to monitor, encourage and support the harmonized implementation of the IPPC and its ISPMs by contracting parties; and the identification and addressing of potential and emerging implementation problems.

In 2008, the Third Session of CPM endorsed the report of the open-ended working group, and adopted the modified programme for the development of the IRSS.

The IRSS was to be divided into two major components: the Implementation Review System (IRS) and the Implementation Support System (ISS). The IRS monitors the fulfillment of reporting requirements of contracting parties through the [International Phytosanitary Portal](#) (IPP) and monitors the implementation of other non-reporting obligations contained in the IPPC. The ISS assists contracting parties by linking them to resources related to ISPM implementation. It was also agreed that the IRSS would produce the Implementation Review Response (IRR) report every three years.

The IRR report will summarize the [IRSS Helpdesk](#) activities and the overall implementation of IPPC reporting and non-reporting obligations. It will also cover methodological elements and overall effects of the work of the IRSS on the IPPC and its subsidiary bodies and provide recommendations for future activities to enhance the implementation of the IPPC and ISPMs. Such recommendations may be incorporated into the operational work programme of the CPM.

## SECTION III. IPPC STRATEGIC FRAMEWORK

### Role of the IRSS in the FAO and IPPC strategic frameworks

The IPPC is a key FAO instrument among its members for ensuring food security, conservation of plant resources, and trade facilitation. The work of the IPPC plays an important role in supporting the main overarching goals of the FAO, in particular the FAO's strategic objectives one and two relating to food security and the sustainable intensification of crop production, and strategic objective four enabling inclusive and efficient agricultural and food systems. Part of objective four emphasizes the critical role international agreements and in particular international standards have on promoting fair and safe trade and enhancing regional and global market opportunities and participation. The IPPC strives to align the IPPC's activities with the FAO strategic objectives as well as the new FAO Results Based Management System. The IPPC has developed a strategic framework,

which consists of four strategic objectives covering global food security, environmental protection, economic and trade facilitation and phytosanitary capacity development for contracting parties.

The delivery of strategic results depends on the IPPC's contracting parties' ability to implement the Convention at the country and regional level. In an effort to ensure effectiveness of the IPPC, the IRSS project has been an important first step towards the establishment of a baseline set of information on IPPC reporting and non-reporting obligations by contracting parties.

This triennial IRR report serves as summation of all the outputs of the IRSS. This document will have a strategic value to inform the development of work programmes of the subsidiary bodies of the IPPC including the Capacity Development Committee (CDC), the Framework for Standards, the SC, and the SBDS.

## SECTION IV. STATUS AND IMPACTS OF THE IMPLEMENTATION OF CORE PHYTOSANITARY ACTIVITIES

In 2006, the First Session of the CPM discussed the subject of compliance and emphasized that the issue needed to be further investigated by an open-ended working group. Considerations were made with regard to the meaning of "compliance mechanisms" which were defined as systems designed to promote and improve compliance with a convention to better ensure its implementation and functioning.

It was believed that compliance mechanisms can be facilitative or contain enforcement elements. A possible compliance mechanism for the IPPC was thought to be of a facilitative character since it could also contain non-obligatory elements, such as the implementation of ISPMs. As such, the open-ended working group determined that a comprehensive implementation review and support system should be proposed for adoption by the CPM, which it did in 2008. The following chapters aim to provide an overview of the implementation of IPPC obligations and other provisions, as well as specified ISPMs by contracting parties. Information on the structure of the IRSS, the methodology applied in carrying out implementation reviews and detailed results are provided. In addition, the impact of the IPPC and ISPM implementation is evaluated.

### The structure of the IRSS

The IRSS is characterized by the following two components:

- Implementation Review System (IRS); and
- Implementation Support System (ISS).

The first component is differentiated by two elements: firstly, to monitor, on an ongoing basis, the fulfillment of reporting obligations by contracting parties undertaken through the [IPP](#). Secondly, that a "triennial review" should be undertaken to evaluate the implementation of other obligations contained in the IPPC. This should be done through a questionnaire developed to elicit data and information from contracting parties regarding implementation with the IPPC obligations, in particular to Articles IV, V, VII and VIII. Data received was to be compiled by the IPPC Secretariat, analyzed and published in this IRR report, to be considered by the CPM. The following chapters constitute the implementation review and do not include analysis of the ISS.

## Monitoring of IPPC Reporting Obligations

The intention of the IRSS has been for the IPPC Secretariat to monitor, on an ongoing basis, the fulfillment of reporting obligations by contracting parties undertaken through the [IPP](#). As a second step is for the Secretariat to determine contracting parties who are not complying with their reporting obligations and provide an annual report on this inactivity to the CPM.

The monitoring of reporting obligations by the IPPC Secretariat was considered to be one of the least resource intensive and simplest undertakings in the implementation review. Since the IPPC Secretariat maintains the [IPP](#) it was thought to be relatively straightforward to check which countries have entered their obligatory information.

### Basic Reporting

- Description of the NPPOs (Article IV.4)
- Phytosanitary restrictions, requirements and prohibitions (Article VII.2 (b))
- List of regulated pest lists (Article VII.2 (i))
- Official contact points (Article VIII.2)

### Event Reporting

- Pest reports (Articles IV.2 (b) & VIII.1 (a) & VIII.1 (c))
- Emergency actions (Article VII.6)

At CPM 7 (2012) and CPM 8 (2013) no detailed statistical analyses of the reporting obligations were provided, as foreseen in the IRSS objectives. However, within the context of the IPPC Secretariats' annual CPM report, general information on the fulfillment of reporting obligations was included.

Following on from general reporting, the IPPC Secretariat produced a statistical analysis of the fulfillment of reporting obligations in the report "Meeting National Reporting Obligations - Statistics", for use by the National Reporting Obligations Advisory Group (NROAG). This analysis attempted to provide statistics with regard to the regional performance in meeting reporting obligations, for example which countries had met their basic reporting obligations. The regional analysis, however, was flawed in two principal ways, including geographic location anomalies and a focus on the publication of a report rather than its contents.

On the [IPP](#), a website has been created which provides statistical analysis of reporting obligations met, although some of the information displayed is difficult to comprehend and in certain cases it is not clear how the statistics were compiled. However, one table displaying the percentage of countries per region that have reporting information (<https://www.ippc.int/countries/regionspercentage>) is informative, it shows that with two exceptions, regions have similar reporting patterns.

### Synopsis: Monitoring of reporting obligations

- No systematic monitoring of the fulfilment of reporting obligations was carried out
- CPM 7 and CPM 8 were not provided with detailed reports on the fulfilment of reporting obligations
- Some statistical analysis has been conducted
- In general the implementation of reporting obligations is very poor
- Particular focus on assisting contracting parties in fulfilling their reporting obligations should be devoted to the Near East region

The fulfillment of reporting obligations by countries from the regions of Africa, Europe, Southwest Pacific, Asia as well as Latin America and the Caribbean are quite similar. For the basic reporting obligations these areas have varying degrees of reporting ranging between 30-60% of countries fulfilling their obligations. The North American region has an outstanding reporting track record, which can be attributed to the presence of two highly developed countries in the region. The Near-East region has a considerable lower reporting record than any other region in all basic reporting categories. Finally, although the European region has a relatively high degree of harmonization and generally strong development, it does not positively correlate to its reporting activities.

It is disappointing to see that 17 years after the adoption of the revision of the IPPC only approximately 50% of contracting parties have fulfilled all their basic reporting obligations.

The regular monitoring of the fulfillment of reporting obligations should be an integral method for comparing responses to the questionnaires on pest reporting and the general IPPC obligations, as found in the following chapters.

### Triennial Review of the IPPC Implementation

The second element of the implementation review of the IPPC and its ISPMs included a number of activities undertaken by the IPPC Secretariat. Originally at the adoption of the IRSS it had been envisaged that one questionnaire would be developed to elicit data from contracting parties regarding compliance to IPPC obligations, in particular to Articles IV, V, VII and VIII. It was thought that the questionnaire should be as concise as possible to ensure that the work for contracting parties is kept to a minimum. However, this process would incur some costs to RPPOs and NPPOs to complete the questionnaire and when necessary translate it into national language(s).

#### Activities undertaken

The second element of the implementation review activities included undertaking contracting party questionnaires, investigation of current phytosanitary issues and studies at the request of other IPPC Secretariat bodies.

#### Questionnaires:

- General IPPC obligations
- ISPM 4 *Requirements for the establishment of pest free areas* implementation
- ISPM 6 *Guidelines for surveillance* implementation
- ISPM 8 *Determination of pest status in an area* implementation
- ISPM 13 *Guidelines for the notification of non-compliance and emergency action* implementation
- ISPM 17 *Pest reporting* & 19 *Guidelines on lists of regulated pests* implementation

#### Synopsis: Questionnaires

- Six questions with a total of well over 200 questions were distributed to all contracting parties
- The response rate was very poor with well under 50% responses for most questionnaires
- Resource needs of contracting parties to coordinate answers may have prevented higher participation
- Surveillance questionnaire the most 'successful' with 100 contracting parties responding
- The quality and understanding of the questionnaire were considered challenging by some contracting parties

### ***Investigation of current phytosanitary issues:***

- Implementation of ISPM 6: Challenges and Best Practices
- Aquatic plants: Their Uses and Risks
- Internet Trade (e-Commerce) in Plants
- Application of Equivalence between Pest Risk Management Measures

### ***Studies requested by various CPM and IPPC Secretariat bodies, including:***

- ePhyto Feasibility Study
- Establishing priority pests
- Study on the utility of IPPC diagnostic protocols

For varying reasons these studies were not accepted by the CPM Bureau as part of the IRSS, but were addressed in other ways.

The following chapters summarize the findings of the above IRS activities.

## **Results obtained**

### ***Notes in relation to the questionnaires***

In general, questionnaires are a valid and appropriate way of obtaining representative information on certain issues. In its questionnaires the IPPC Secretariat requested official information on the implementation of the IPPC and its ISPMs from contracting parties. This activity was undertaken by contracting parties exercising a high level of caution in the official statements they made.

In many countries a contracting party's NPPO may only have a technical mandate regarding IPPC matters and are subject to oversight by foreign ministries or other government bodies who have the general responsibility for United Nations affairs. This means that any communication to the IPPC on implementation matters may have to be closely coordinated with different government authorities, in addition to technical coordination with experts and local authorities. This coordination activity can make the official reply very work intensive and costly. In addition, translation can add to the resource needs, therefore a contracting party will consider very carefully if they choose to answer every IPPC questionnaire or only those which are easiest or most applicable to them. An observation at CPM 8 (2013) stated that contracting parties may undergo questionnaire fatigue and this may have been reflected in the number of responses to the questionnaires:

- General Survey of IPPC (73 respondents)
- ISPM 4 implementation (27 respondents)
- ISPM 6 implementation (100 respondents)
- ISPM 8 implementation (29 respondents)
- ISPM 13 implementation (43 respondents)
- ISPM 17 & 19 implementation (63 respondents)

With exception of the questionnaire on ISPM 6, for which a series of regional workshops were run in conjunction with the questionnaire, questionnaire responses were well under 50% of the IPPC contracting parties. Some questionnaires had less than 20% response rate. Questionnaire responses from some contracting parties stated that certain questions were difficult to understand, to answer or were illogical. In the General IPPC Survey one question was addressed to solicit the contracting parties' opinions on the questionnaire itself, to which several criticisms were received. However, most feedback stated questions were straightforward and easy to understand.



## Findings in relation to the questionnaires

### **Implementation of the IPPC and ISPM 4 provisions concerning pest free areas (PFA)**

According to ISPM 5 Glossary of phytosanitary terms a PFA is “an area in which a specific pest does not occur as demonstrated by scientific evidence and in which, where appropriate, this condition is being officially maintained”. The IPPC provides in its Article IV 2(e) that the responsibility of an NPPO is the protection of endangered areas and the designation, maintenance and surveillance of PFAs and areas of low pest prevalence (ALPP). Although it is the responsibility of the NPPO to maintain and survey PFAs where they exist, it is not an obligation for NPPOs to establish one. ISPM 4 states in its scope that it describes “the requirements for the establishment and use of pest free areas (PFAs) as a risk management option”.

The implementation of ISPM 4 on the establishment of PFAs depends, therefore, on the choice of an NPPO if it wishes to protect an area within its own territory against a specified pest or for the fulfillment of an importing country’s requirements. In both cases, for endangered area protection and export facilitation, the provisions of ISPM 4 should be followed.

As part of the General IPPC Survey contracting parties were questioned about their implementation of ISPM 4. In addition a specific questionnaire on the implementation of ISPM 4 was sent to all IPPC contracting parties. Unfortunately, the number of responses was very low (27 contracting parties). The highest participation came from Europe, followed by three responses from the Latin America and Caribbean region and no response from North America and the South-West Pacific regions. Considering the low responses rate, as well as the uneven distribution it is difficult to consider the results as representative. However, certain answers to the questionnaire were very informative and indicate some implementation difficulties.

According to the cumulative results obtained ISPM 4 is implemented by the majority of contracting parties (who responded) to some degree, however only 35% of those responding to the General IPPC Survey indicated a high degree of implementation. On average 20% of the contracting parties responding to the General IPPC Survey and the ISPM 4 specific questionnaire responded that they do not implement it at all, which is a valid choice if the NPPO decides not to establish PFAs. Unfortunately no data is available clarifying the number of contracting parties with PFAs, but which did not implement ISPM 4. In addition, it would have also been very informative to determine the number of contracting parties which use PFAs as an import phytosanitary requirement.

### **Synopsis: ISPM 4 implementation**

- **The implementation of ISPM 4 is not particularly strong. This may be due to the fact that PFAs are only one possible management option.**
- **Systematic capacity limitations, such as a lack of diagnostics, staff, resources, legislation are the main difficulties in implementing ISPM 4**
- **A lack in understanding and implementing technical aspects of ISPM 4 are also inhibiting implementation**
- **Mobilizing small subsistence farmers and lack of industry organizations may hinder implementation**
- **The bilateral nature of many PFAs poses difficulties**
- **Proposals for reviewing ISPM 4 have been submitted to the SC and were considered in the revision of the ISPM 4 specification**

From analysis of the limitations of contracting parties implementing ISPM 4, it shows that many systematic capacity limitations apply. Missing or insufficient legislation, financial and staff resource limitations as well as technical and scientific capacity confines were the main reasons provided. Contracting parties who have no appropriate diagnostic capacity or surveillance capability will also have difficulties in establishing PFAs in accordance with ISPM 4. In responding to the ISPM 4 questionnaire contracting parties indicated the technical and scientific components such as determination, establishment and maintenance of PFAs are the most difficult to implement.

The specific questionnaire on ISPM 4 also indicated some aspects that are not usually addressed in an IPPC context. The notion that technical parameters for many PFAs are negotiated in bilateral agreements with importing countries led to the opinion that it would be important to know how PFAs have been negotiated. One particular difficulty for certain developing countries was identified as the lack of farmers and producers to participate in the activities to establish PFAs. Considering that in many developing countries the majority of producers are small subsistence farmers with minimal education and a lack of industry association, it appears difficult to mobilize and train such producers in activities to establish and maintain a PFA.

Within the specific questionnaire on ISPM 4 contracting parties were also asked about inconsistencies with other ISPMs or needs to amend the standard. Of particular interest was the question of determining PFA borders. The results of this question were communicated to the SC in 2012, which have been considered in the specification for the revision of ISPM 4.

#### ***Implementation of the IPPC and ISPM 6 provisions concerning pest surveillance***

Article VII 2(i) of the IPPC provides that "contracting parties shall, to the best of their ability, conduct surveillance for pests and develop and maintain adequate information on pest status in order to support categorization of pests, and for the development of appropriate phytosanitary measures. This information shall be made available to contracting parties, on request". To assist in the implementation of surveillance ISPM 6 was developed and adopted by the CPM.

Surveillance is a fundamental NPPO activity on which other phytosanitary activities are based and dependent on, such as PRA, the establishment of phytosanitary measures, control and eradication measures and pest reporting. With a sound and functional surveillance system NPPOs are able to implement many other IPPC and ISPM provisions.

To investigate the implementation of the IPPC and ISPM 6 surveillance provisions a specific questionnaire was designed consisting of 77 questions and sent to all contracting parties. In order to receive further information on implementation, a series of regional workshops were also conducted. Although 108 countries responded to the questionnaire, only 100 provided substantive answers.

The results of the specific questionnaire were not only used to analyze the implementation of the IPPC and ISPM 6 surveillance provisions, but also to serve as the basis for a symposium on the implementation challenges and best practices. The symposium was hosted by the Asia Pacific Plant Protection Convention (APPPC) in the Republic of Korea in 2012 and was attended by representatives from all FAO regions. A report on the implementation of the surveillance provisions has been published by the IPPC Secretariat - "Implementation of ISPM 6 – Challenges and Best Practices". Summary results of the review of ISPM 6 implementation are presented below.

In most countries the responsibility for undertaking surveillance activities is attributed to the NPPO. Most NPPOs undertake surveillance for many different pests including quarantine pests, regulated non-quarantine pests and pests of national concern. However, in most countries more than one organization decides which plant species/plant products are officially surveyed. These include, inter alia, biosecurity agencies (including NPPOs and forest service institutions), ministries responsible for agriculture, forestry, natural resources, environment, research organizations and commodity export groups.

In many countries stakeholders are involved in carrying out surveillance activities. These stakeholders are largely from research organizations or institutions dealing with agriculture, forestry, environment and natural resources; universities; industry representatives or associations, i.e. producers, and traders; local/regional governments; other governmental agencies/ministries; chambers of commerce/associations of manufacturers; surveillance reference groups; registered growers; specific commodity interest groups and the general public. It is important to emphasize the availability of written surveillance procedures when engaging stakeholders in such activities.

The availability of reliable diagnostic services is seen as a pre-requisite for conducting specific surveys. In many developing countries access to diagnostic laboratories has been identified as a limiting factor in carrying out specific surveillance and therefore implementation of ISPM 6. Similar statements were made in relation to the implementation of ISPM 8 and ISPM 17. The reliance on laboratories which are not under the authority of the NPPO raises questions with regard to their accreditation and supervision. Another important aspect in carrying out specific surveys is the availability of specimen sampling procedures. Documented procedures for specimen sampling, sample delivery, intermediate storage and disposal are in use by less than 50% of the contracting parties. The availability of well documented procedures is especially important when sampling is carried out by non-NPPO personnel who need to be trained to undertake survey activities.

As a final consideration on the outcome of the specific questionnaire, the financial and resource implications of carrying out surveillance activities are also a limiting factor for many developing countries. Resource constraints

#### **Synopsis: ISPM 6 implementation**

- **Medium to high implementation of ISPM 6 in general**
- **Limitations in the amount of pests for which specific surveys are conducted**
- **For most contracting parties, NPPOs are the responsible body to carry out surveillance**
- **Stakeholder involvement in survey activities may need procedures or rules**
- **Systematic capacity limitations included lack of diagnostics, trained staff, resources and sampling procedures (1)**
- **Extremely well designed and researched implementation study**

require contracting parties to choose which pests to survey for and thus may have repercussions on the market access of countries that depend on the ability to export agricultural or horticultural goods. Awareness of the benefits of surveillance needs to be raised in many countries.

The implementation challenges for ISPM 6 are well documented in the IPPC Secretariat report and a number of detailed suggestions for improving implementation are given. The combination of data generated from the specific questionnaire, a series of regional workshops and a symposium makes the efforts of the IRSS on the implementation of ISPM 6 one of the most extensive and well documented studies on the implementation of an international standard.

#### ***Implementation ISPM 8 provisions concerning pest status in an area***

ISPM 8 describes the content of a pest record, their use and other information in the determination of pest status in an area. The determination of pest status in an area is a fundamental basis for carrying out PRA, regulating pests, complying with importing country requirements, planning pest management programmes, establishing national pest lists and the maintenance of PFAs. Contracting parties should follow good reporting practices to facilitate international cooperation among contracting parties in meeting their obligations in reporting the occurrence, outbreak or spread of pests.

As part of the General IPPC Survey and a specific questionnaire, contracting parties were questioned about their implementation of ISPM 8. Unfortunately, the number of responses was very low (29 contracting parties). The highest participation came from Europe, followed by three responses from the Latin America and Caribbean region and no response from the South-West Pacific region. Considering the low response rate, as well as the uneven distribution it is difficult to consider the results as representative. However, certain answers to the questionnaire are very informative and indicate some implementation difficulties.

According to the results of the General IPPC Survey ISPM 8 is implemented by the majority of the contracting parties to some degree. The results found 57% of contracting parties responding to the question indicated a high degree of implementation and 34% a low degree of implementation. Interesting is the fact that four contracting parties answered they don't implement ISPM 8 at all and two stated that the standard is not applicable to them. In conclusion, it can be said that ISPM 8 implementation is neither weak nor particularly strong.

As in other cases, results show that many of the systematic capacity limitations also apply to the implementation of ISPM 8. Outcomes of the questionnaire indicate that the surveillance limitations of contracting parties have direct effects on the implementation of ISPM 8. NPPOs without sufficient capacity to carry out surveys and to identify pests will not be able to create, maintain or confirm accurate pest records and therefore the determination of pest status becomes arbitrary.

#### **Synopsis: ISPM 8 implementation**

- **Medium implementation of ISPM 8**
- **Systematic capacity limitations, such as lack of diagnostics, trained staff, resources and surveillance are the main difficulties for implementing ISPM 8**
- **Lack of capacity in generating and maintaining pest records**
- **Lack of surveillance data may enhance confusion about pest status categories**
- **Internal national flow of pest information is a limiting factor**
- **Proposals for reviewing ISPM 8 were submitted to the SC and were considered in the revision of the ISPM 8 specification**

Another area causing ISPM 8 implementation difficulties and lack of determination of pest records is the limited flow of information between different authorities and institutions active in plant health and/or environmental protection; in many developing countries publications concerning pests have rather been limited. Much information on pests is unpublished which necessitates that the NPPO has a good exchange of information with universities, research institutes and other authorities. Several less developed countries also indicated their lack of understanding regarding some pest status categories. Especially the concept of "transience", was found to cause confusion and misunderstandings.

The specific questionnaire results outlined a number of issues in ISPM 8 which were perceived as being inconsistent with IPPC and other ISPM provisions, indicating clarifications in the standard are necessary. These suggestions were presented to the SC in April 2012 and included in the specification for the revision of the standard.

### ***Implementation of the IPPC and ISPM 13 provisions concerning notifications of non-compliance and emergency measures***

Article VII 2 (f) of the IPPC specifies that "importing contracting parties shall, as soon as possible, inform the exporting contracting party concerned or, where appropriate, the re-exporting contracting party concerned, of significant instances of non-compliance with phytosanitary certification. The exporting contracting party or, where appropriate, the re-exporting contracting party concerned, should investigate and, on request, report the result of its investigation to the importing contracting party concerned." In addition, Article VII.6 states that contracting parties may take "appropriate emergency action on the detection of a pest posing a potential threat to its territories or the report of such a detection. Any such action shall be evaluated as soon as possible to ensure that its continuance is justified. The action taken shall be immediately reported to contracting parties concerned, the Secretary, and any regional plant protection organization of which the contracting party is a member." In order to provide guidance on these provisions ISPM 13 was adopted to provide guidance on the notification of non-compliance and emergency measures.

On request by the SBDS in 2012 a specific questionnaire concerning the implementation of the IPPC and ISPM 13 provisions was developed and sent to all contracting parties. The questionnaire was extensive, including six sections and including 56 questions. Fifty-eight contracting parties (one provided two independent responses) started the questionnaire by filling in their name; however 16 then stopped and did not complete the questionnaire any further. Responses to different sections of the questionnaire varied, showing a decreasing trend. In the first section 43 responses were given, followed by 42 in the second, 40 in the third and 38 in the fourth. It appears that when contracting parties were not able to answer a specific question, they did not continue the questionnaire further.

Outcomes of the questionnaire indicate several questions were difficult to understand or answer. For instance the question "Do you have any bilateral agreements in place for reporting OR responding to instances of non-compliance?" was considered difficult. A possible explanation for this is that the question has two parts, which may have confused contracting parties. For example a contracting party may have bilateral reporting agreements in place but not specifically for non-compliance reporting, or vice versa. Due to the fact that quite a number of questions were imprecise or confusing it is difficult to consider the representativeness of the responses given. However, there were also a number of straightforward and relevant questions which make it possible to identify difficulties in implementing certain IPPC or ISPM 13 provisions.

The questionnaire revealed that an overwhelming majority of contracting parties have a system in place which gives clear legal authority to NPPOs to notify exporting countries in significant cases of non-compliance. In addition, contracting parties usually provide the NPPO with legal authority to address significant cases of non-compliance through actions such as destroying, resending or treating consignments to mitigate risk. The absence of specific data from three contracting parties who have no clear legal authority given to the NPPO makes it difficult to analyze this provision further.

Most contracting parties who receive non-compliance notifications were the primary communication channel or the authority to whom replies shall be addressed. Therefore the provisions of ISPM 13 with regard to notifications appears to be implemented by many contracting parties. The absence of specific data from the eight countries which replied that they do not receive notifications makes it difficult to consider if these occurrences are indicators of systems failure or individual negligence. The lack of specific data quantifying such occurrences provides additional difficulties in identifying trends of implementation limitations.

The fact that 16 contracting parties felt that importing countries' phytosanitary import requirements are not easily accessible, even after requesting them, is disconcerting, considering the focus of transparency promoted by international organizations such as the IPPC Secretariat and the World Trade Organization (WTO) Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement). The IPPC obligation for contracting parties to publish and transmit phytosanitary requirements, restrictions and prohibitions to any contracting party or parties that they believe may

### **Synopsis: ISPM 13 implementation**

- **Medium to high implementation of ISPM 13**
- **Capacity limitations, such as lack of administrative procedures, communication policies, technical equipment are the main difficulties for implementing ISPM 13**
- **ISPM 13 may not provide enough guidance, especially in relation to the timing of notifications, detailed notification forms and languages**
- **Most contracting parties have their NPPO as the responsible authority for notifications**
- **Considerable difficulties of contracting parties to obtain the phytosanitary requirements of importing countries, even after requests**
- **Substantial numbers of contracting parties receive notifications reporting the pest finding of a pest which is not present in the exporting country**
- **Documentary reasons account for the most non-compliance cases**

be directly affected by such measures, seems not to be implemented by a considerable number of contracting parties.

The questionnaire revealed that there are still deficiencies in the flow of information from NPPOs to producers and exporters about detailed phytosanitary requirements of importing countries. In this context it should be noted that this is a general problem affecting countries of different development statuses.

The responses to several questions showed that not all notifications of non-compliance are followed-up and investigated by the NPPO of the exporting contracting party. This indicates that some contracting parties are not taking relevant provisions in the IPPC and ISPM 13 seriously or that some notifications of non-compliance are not deemed significant enough to warrant an investigation. It should be noted that most contracting parties issue less than 50 notifications of non-compliance per year.

Approximately half of the responding contracting parties indicated that they had received a notification of non-compliance caused by a pest which is not present in their country. Although, an apparently substantial number of countries had this experience, the reasons provided clarified that these cases are relatively rare. Two very specific cases were mentioned, namely travelers and wood packaging material (WPM). In both cases it is difficult to attribute an intercepted pest to a certain country of origin.

From contracting party responses the failure to comply with documentary requirements is the most frequent reason for non-compliance. This would include the absence of phytosanitary certificates, uncertified alterations or erasures to phytosanitary certificates, serious deficiencies in information on phytosanitary certificates and fraudulent phytosanitary certificates. The other major reasons are the failure to comply with phytosanitary import requirements and the detection of regulated pests.

A major shortcoming in implementing the provisions of ISPM 13 may be due to a lack of comprehensive record keeping and corresponding information retrieval systems. This capacity allows an NPPO to provide appropriate information to relevant parties in cases of significant non-compliance. However, overall NPPOs have procedures in place for exchange of information in significant cases of non-compliance.

From analyzing the limitations of contracting parties implementing ISPM 13, it has been found that primarily administrative limitations as well as some technical difficulties cause issues. In addition, weak communication and information exchange capacities as well as minimal or insufficient technical equipment are the main reasons why contracting parties may not notify cases of non-compliance.

### ***Implementation of the IPPC, ISPM 17 and ISPM 19 provisions concerning pest lists and pest reporting***

Article VII 2(i) of the IPPC provides that "contracting parties shall, to the best of their ability, establish and update lists of regulated pests, using scientific names, and make such lists available to the Secretary, to regional plant protection organizations of which they are members and, on request, to other contracting parties". In addition, Article VIII 1(a) specifies that contracting parties shall "cooperate in the exchange of information on plant pests, particularly the reporting of the occurrence, outbreak or spread of pests that may be of immediate or potential danger, in accordance with such procedures as may be established by the Commission". These provisions were the trigger for the CPM to provide further guidance to contracting parties by the adoption of ISPM 17 and ISPM 19.

In order to investigate the implementation of reporting obligations by contracting parties, such as the publication of lists of regulated pests and the occurrence, outbreak or spread of pests, and to supplement the results of the General IPPC Survey, the subsidiary bodies of the CPM and the CPM Bureau agreed to a specific questionnaire for ISPM 17 and ISPM 19. Unfortunately, the IPPC Secretariat did not carry out an analysis of reporting in the [IPP](#) by contracting parties. Such an analysis and its comparison with responses to the questionnaire would have provided a very representative overview on the fulfillment of reporting obligations.

The questionnaire on ISPM 17 and ISPM 19 contained 63 questions and was sent to all IPPC contracting parties. In total, 63 contracting parties answered the questionnaire, which constitutes a 37% response rate. Distribution of contracting party responses from different FAO regions was approximately even.

In the General IPPC Survey questions concerning the implementation of ISPM 17 and ISPM 19 had different results. For both ISPMs contracting parties thought that they were moderately or highly relevant, but difficult to implement. The main limiting implementation factor of these standards was thought to be due to the lack of skilled and qualified personnel. In addition, the lack of financial resources, infrastructure and facilities were indicated by one third of contracting parties as the limiting implementation factors.

### ***ISPM 19 results***

The results of the questionnaire showed that a relatively high percentage of contracting parties believe that they have implemented ISPM 19, although a lower percentage indicated they compile lists of regulated non-quarantine pests. The majority of responding contracting parties (almost 80%) indicated that they publish their pest lists on the [IPP](#). This is an unexpected response trend, since the statistics of reporting obligations on the [IPP](#) show that pest listing has the weakest implementation of the IPPC reporting obligations. It may however, be possible that most of the contracting parties having listed their pest lists on the [IPP](#) have answered the questionnaire.

Disappointingly, almost 20% of the contracting parties do not transmit their pest lists to other contracting parties even when they are requested. Only five countries fully agree that they had received lists of regulated pests from contracting parties they trade with. When questioned which pests lists are requested, not only regulated pests were requested, but also lists of pests which occur on certain hosts and the production system, but which are not officially controlled. A possible reason for these requests is for use of the pest lists as part of the PRA process, which may have confused contracting parties when making their responses to the questionnaire.

#### **Synopsis: ISPM 19 implementation**

- **Medium to high implementation of ISPM 19**
- **Low implementation of ISPM 19 according to the IPP**
- **Pest lists are not always transmitted after receiving a request**
- **Implementation difficulties may attribute to lack of legislation, national procedures and guidelines or operational manuals**
- **Possible confusion on the concept of 'lists of regulated pests'**
- **ISPM 19 may not be clear enough**



The limiting implementation factors, as indicated by the contracting parties in the establishment of lists of regulated pests were found to be associated with legislation and lack of national guidelines or standard operating procedures for listing regulated pests. However, ISPM 19 provides that pests to be listed are those that have been determined by the NPPO to require phytosanitary measures. Every NPPO should be able to list those pests without specific guidance. Although it appears that the guidance may not be understood by many contracting parties.

### **ISPM 17 results**

The majority of contracting parties indicated they frequently report and receive reports for the occurrence and outbreak of pests and the detection of quarantine pests in accordance with ISPM 17. However, when analyzed further, this response trend was contradictory to the pest reporting statistics published on the [IPP](#), in which relatively low pest reporting is indicated. Four contracting parties indicated that they don't report in any form, such as on the [IPP](#), to their RPPO or bilaterally, while approximately half of the responding contracting parties indicated they report on the [IPP](#) and to RPPOs.

An interesting response from the questionnaire was the origins of pest reports, while most contracting parties use official pest surveillance data, other information is also used. Official pest reports can come in many published forms, such as scientific journals, university publications, news articles and industry reports. It is unfortunate that the questionnaire did not request information as to the procedures in place to verify pest reports based in such publications. ISPM 17 clearly states that NPPOs should put in place systems for verification of domestic pest reports from official and other sources (including those brought to their attention by other countries). Approximately 50% of responding contracting parties indicated that they have no verification systems in place.

The internet or e-mails were identified as the preferred channels for communicating pest reports with trading partners. Unfortunately, the [IPP](#) was found to play a less important role in report communication, with even the RPPO reporting channel considered more important. This lack of implementation is disappointing, since it is an obligation for contracting parties to officially report the occurrence, outbreak or spread of pests to the [IPP](#).

Contracting parties responding from developing countries stated the primary cause for implementation difficulties were due to lack of appropriate electronic storage and retrieval systems. In addition the lack of national guidelines or standard operating procedures for pest reporting may also be a limiting factor. It is of concern that 40% of contracting parties report that they do not have arrangements in place to collect, store, analyze and verify pest reports in their countries. Almost

### **Synopsis: ISPM 17 implementation**

- **Medium to high implementation of ISPM 17**
- **Low implementation of ISPM 17 according to the IPP**
- **Pest reporting on the IPP is not the most widely used means of communication**
- **Reporting to RPPOs as most widely used means of communication**
- **Scientific and/or 'grey' literature and reports used in many cases without verification of pest reports**
- **Implementation difficulties may attribute to lack of legislation, national procedures, guidelines or operational manuals or electronic storage and retrieval systems**
- **Many non-official pest reports treated as official by trading partners**

50% of responding contracting parties reporting having experienced cases where non-official pest reports were treated as official by their trading partners.

### ***Implementation of other IPPC provisions (the General IPPC Survey)***

The General IPPC Survey on the implementation of the IPPC and ISPM provisions was designed as an indicator to measure which provisions are the most challenging to contracting parties. The survey was augmented by the development of specific questionnaires on individual provisions and/or ISPMs in order to solicit specific data. The survey contained 49 questions and was sent to all contracting parties. In total 77 contacting parties provided substantive responses to the survey. This chapter only discusses those provisions not already analyzed in the chapters above.

#### ***Phytosanitary certificates and phytosanitary certification systems***

The most widely implemented provisions of the IPPC are those related to the issuance of phytosanitary certificates. A 90% response rate for a very strong degree of implementation was received for this international requirement. It should, however, be pointed out that the issuance of phytosanitary certificates is a necessity for the majority of trade.

#### ***Inspections***

One of the major responsibilities of NPPOs is to carry out phytosanitary inspections, in accordance with Article IV of the IPPC. Most contracting parties indicated that they fully implement these provisions. However, responses from some contracting parties, stated inspection activities are not fully implemented because trade considerations override plant protection activities. It is not fully clear if this is in relation to import or export.

#### ***Pest Risk Analysis***

One of the principles of the IPPC (and the WTO SPS Agreement) is that phytosanitary measures must be technically justified, meaning that they are based on PRA. Although a suite of ISPMs have been developed to provide guidance on PRA, many contracting parties responded that they have difficulties in implementing PRA provisions, with 24% of contracting parties indicating low implementation. Only 43% of contracting parties reported full implementation of this responsibility. Contracting parties noted that their NPPOs face difficulties due to inadequate quarantine facilities, inadequate funding given that this is a particularly high-cost activity, a lack of cooperation from other contracting parties who fail to provide required information necessary to process a PRA, and a lack of trained specialists.

#### **Synopsis: General IPPC implementation**

- **Very high implementation of provisions for phytosanitary certificates**
- **High implementation of provisions concerning inspection**
- **Medium implementation of PRA provisions (and consequently the technical justification requirement)**
- **Moderate implementation of provisions concerning the issuance of phytosanitary requirements**
- **Implementation difficulties may attribute to lack of trained staff, financial resources or capacity support**

### ***Phytosanitary Regulations***

According to the IPPC Article IV 3(c) each contracting party shall make provision, to the best of its ability, for the issuance of phytosanitary regulations. This is a prerequisite for fulfilling reporting obligations which include phytosanitary restrictions, requirements and prohibitions. It is also of importance with regard to fulfilling the WTO SPS Agreement provisions in relation to transparency. According to the responses given in the survey there is only moderate implementation of the provisions to issue phytosanitary regulations.

For the other more detailed ISPMs reviews, most contracting parties identified the lack of well trained personnel, lack of financial resources and lack of capacity support as the main challenges for implementation.

### **Findings in relation to the studies**

As indicated earlier in this section a number of studies had been commissioned by the IPPC Secretariat to investigate certain topics. Of these studies two were of immediate importance to the IPPC:

- Aquatic plants: Their Uses and Risks
- Internet Trade (e-Commerce) in Plants: Potential Phytosanitary Risks

These studies did not attempt to review the implementation of the IPPC and its provisions, but instead focused on identifying potential issues contracting parties face in plant health.

The study on aquatic plants highlighted the phytosanitary risks posed by pests of aquatic plants, as well as the risks posed by some aquatic plants when introduced into other ecosystems (invasive alien species - IAS). Within the context of the Convention on Biological Diversity the IPPC explored the question of whether to protect only terrestrial plants or all plants. To highlight the study it was presented and discussed at a scientific session of the CPM. The IRSS study helped the CPM to come to a conclusion and at CPM 9 (2014) a recommendation was adopted stating that aquatic plants should be protected and invasive aquatic plants should be considered as potential pests under the IPPC framework.

The study on internet trade of plants sought to identify the risks posed by the new and increased sale of plants and plant products ordered through the internet. This trade presents new challenges to NPPOs and their inspection activities. The study was also presented and discussed at the CPM and a recommendation adopted at CPM 9 (2014) for the encouragement of NPPOs and RPPOs to respond to phytosanitary risks associated with internet trade in plants and other regulated materials.

Both studies contributed to the work of the IPPC, but were not directly connected to the implementation review of the IRSS. They were policy investigations undertaken by the IPPC Secretariat and the CPM and sought to define future directions of the IPPC in general. For the second cycle of IRSS the CPM and the sponsor of the IRSS may want to consider whether it is of advantage to have such studies conducted within the IRSS project, as this may divert resources earmarked for implementation review and support.

## SECTION V. SUBSIDIARY BODY CHAIRS AND IRSS LINKAGES

### Standards Setting and the Standards Committee (SC)

An overview of the IRSS project was presented to the members of the SC in May 2011 when the IRSS project was in its first stages of implementation. The IRSS Officer proposed that the SC provided suggestions for the IRSS relating to the implementation of ISPMs. The SC did not identify specific topics, however it was noted that revision of three standards (ISPM 4, ISPM 6 and ISPM 8) were on the SC work programme and draft specifications were under development. The SC also suggested there could be an opportunity for the IRSS to seek views from contracting parties on areas for improvement of the ISPMs and to seek inputs related to their implementation.

Based on this and further funding commitments made by the European Commission in 2011, it was decided that the IRSS project would review contracting party implementation of the ISPMs up for specification revision. The IRSS Officer invited the SC to provide inputs into future IRSS activities after the conclusion of the implementation reviews of ISPM 4, ISPM 6 and ISPM 8 in March 2012. An SC representative was selected as a member to participate in the IRSS Triennial Review Group (TRG) which served to oversee the work of the IRSS.

The SC identified several additional topics for future IRSS activities. In the April 2012 SC meeting, the SC requested that the CPM Bureau consider an IRSS study on the feasibility of introducing a global harmonized system for electronic certification (central hub), which would look at the feasibility and cost and benefits of such a system, taking into account the needs of developing countries. This proposal was considered high priority for the CPM Bureau, however not as an IRSS study, but rather as part of future e-Phyto activities. The SC had also proposed a survey on pest interceptions associated with sea containers and an IRSS study on the utility of IPPC diagnostic protocols, but these were not considered suitable at the time.

Following the launch and subsequent analysis of the information obtained from the ISPM 6 questionnaire, the SC steward for ISPM 6 together with the APPPC used the analysis as input towards a symposium on phytosanitary pest surveillance in October 2012. The meeting identified the need for a number of manuals that are now being developed with the support of the IPPC CD team. The outcomes of the symposium and the review of ISPM 6 were used for the development of the specification for the revision of ISPM 6.

The outcomes of the questionnaires for ISPM 4 and ISPM 8 were also used to develop draft specifications. The SC encouraged the stewards of the draft specifications to engage with the IRSS team to analyze the issues and activities arising from the reviews of ISPM 4, ISPM 6 and ISPM 8 so that the views of contracting parties were taken into account. These comments were transmitted to the IRSS Officer and subsequently considered and included in later draft versions.

The draft report of the IRSS General IPPC Survey was used as an input at the meeting of the Framework for Standards Task Force. It was used when developing the draft framework and for the initial gap analysis of the IPPC and its ISPMs. It also helped identify the linkages between the IPPC, its ISPMs and other areas of Secretariat work. The SC will consider the draft Framework for Standards further, undertake a gap analysis and consider how it might be used to prioritize topics and report to CPM on this issue.

In regards to the list of topics for ISPMs, the SC had proposed a modification of the priority of the revision of ISPM 8 from priority level three to one, due to the outcome of the IRSS General IPPC Survey that identified ISPM 8 as a priority for implementation by contracting parties.

Furthermore, the IRSS has supported the SC on the reviews of ISPMs related to the requirements for the establishment of PFAs, the determination of pest status in an area, and guidelines for pest surveillance. It has also contributed towards the Framework for Standards and the list of topics for ISPMs. The SC also made valuable contributions towards the overall guidance and quality of the IRSS products including the development of IRSS questionnaires.

### **Expert Working Group on Capacity Development (EWG-CD) and the Capacity Development Committee (CDC)**

An overview of the IRSS project was provided to the 2<sup>nd</sup> annual EWG-CD in 2011. The Secretariat invited the EWG-CD members to provide feedback on the modalities for contributions to the implementation of the IRSS project. It was agreed that the EWG-CD, and in the future the newly developed CDC would provide comments on any IRSS questionnaires and products prepared under the project.

The IRSS ISPM 4, ISPM 6 and ISPM 8 reviews were presented to the 3<sup>rd</sup> annual EWG-CD in May 2012. Based on the review results the IRSS also compiled and presented a list of suggested actions based on each major thematic areas.

Five major priority areas were identified as most relevant to guide future activities for capacity development. These include the storage of information, advocacy, staff training and human resources, resource mobilization, and finally, operation manuals. The group proposed a number of possible activities under each priority area and concluded with two concept proposals for the IRSS work programme. Given that the results of the review of ISPM 6 and ISPM 8 revealed a weakness in surveillance activities such as limited diagnostic capabilities, poor pest information management systems and accessibility, and low numbers of sufficiently trained and experienced staff, the group felt further analysis on pest reporting would be useful. The group proposed a global review and analysis of the implementation of ISPM 17.

The group also proposed the collection and analysis of regulated pest information from contracting parties and RPPOs to help in identifying common pest threats and to use the information to assist NPPOs and RPPOs to inform and update their lists of regulated pests. Specifically the proposal seeks to provide a listing of top ranked regulated pests and a full analysis of regional differences and commonalities regarding plant health.

The IRSS presented the results of the ISPM 13 review to the first CDC meeting in December 2012. Based on the results, the CDC made several recommendations including the planning of workshops and trainings on how to apply ISPM 13 (with a particular focus on operations) and the development of standard operating procedures and guidance materials in regards to notifications. The CDC also proposed making a call to NPPOs to provide some examples of notification formats for conversion into a generic template which could be posted on the phytosanitary resources page for use as reference material.

The CDC has actively participated in the review and comment on a number of IRSS questionnaires and draft analyses and schedules discussion of IRSS activities at each biannual CDC meeting.

### **Subsidiary Body on Dispute Settlement (SBDS)**

In March 2012, the Secretariat lead for the SBDS requested the CPM Bureau to approve an IRSS review of ISPM 13. It was noted this would be a short term IRSS review, requiring the preparation of a brief questionnaire and a review of WTO documents and other relevant resources. The CPM Bureau agreed the IRSS should carry out the short-term review to determine the needs of the SBDS. Some of the questions the IRSS would serve to answer included which issues have progressed with

the SBDS, what could be improved with the SBDS and the future role of the SBDS involving dispute avoidance.

At the SBDS meeting in March 2013 the IRSS review was submitted for discussion. Members noted that issues brought forth from the ISPM 13 questionnaire could be addressed in a future SC revision of the ISPM, preparation of guidance material for stronger implementation and workshops developed, similar to those held for ISPM 15. Out of this discussion, members identified a need to define the role of the SBDS in implementation of the IPPC. It was agreed by members that while the SBDS and implementation issues have strong links, the role of overseeing IPPC implementation does not fall under the SBDS Terms of Reference.

## SECTION VI. ROLES AND RESPONSIBILITIES

The first cycle of the IRSS demonstrated that there is a clear role for various stakeholders in the review of implementation and the provision of support to contracting parties. At first roles were not clearly defined, but as the project progressed there was a natural shift toward specific roles by the various entities identified below:

### The Commission on Phytosanitary Measures (CPM)

The CPM remains the principal decision maker for the overall work programme. As a result of the activities of the IRSS, as well as the information garnered, it became evident to contracting parties at CPM sessions that there was a greater need for implementation efforts. Toward the end of the first IRSS cycle, the CPM decided to support the establishment of a pilot programme on pest surveillance and emphasized closer integration of the IRSS with such a programme.

### The IPPC Secretariat

The IRSS has been implemented under the auspices of the IPPC Secretariat using a project approach by providing professional and administrative support for its implementation. The IRSS emerged as a cross cutting activity in the IPPC work programme throughout the implementation of the project. The activities conducted by the IRSS required engagement with various IPPC core teams as well as subsidiary bodies. While the approach was not perfect, the horizontal nature of the IRSS also influenced, to some degree, the need for a different approach to implementation in the Secretariat and led to discussions of how best to re-structure the Secretariat to better serve contracting parties.

### The CPM Bureau

Between sessions of the CPM the Bureau provided general oversight of the IRSS work programme including screening and approval of activities proposed by the subsidiary bodies.

### The IPPC subsidiary bodies and associated committees

The IRSS team was represented at the majority of the SC, SBDS, NROAG, as well as the CDC (and formerly the EWG-CD) meetings. The latter committee assisted in the development of the IRSS helpdesk, as well as in the development of the various IRSS questionnaires. The SC and the SBDS proposed a number of possible tasks for the IRSS as well as considered the results of studies undertaken. The SC prioritized revision of several standards based on IRSS guidance, namely ISPM 4, ISPM 6 and ISPM 8.

### Regional Plant Protection Organizations (RPPOs)

The IRSS was represented at all meetings of the Technical Consultation among RPPOs and provided updates on the project, solicited RPPO support to encourage contracting party participation in IRSS activities as well as requested feedback from the RPPOs on IRSS products, in particular desk studies undertaken. The RPPOs' feedback were channeled to the Bureau for consideration.

### National Plant Protection Organizations (NPPOs)

The opportunities to engage NPPOs were more limited, however the IRSS team engaged the NPPOs during the seven annual IPPC regional workshops. In addition a specific forum to discuss the IRSS survey results on pest surveillance, from a regional perspective, was held in each of the seven FAO regions. Furthermore, a final global workshop sponsored by the Republic of Korea was also held on the topic, in which IRSS survey results were considered. The main mechanism to engage NPPOs were in the various IRSS surveys undertaken. The level of engagement is discussed further in the relevant sections of the report.

### The Triennial Review Group (TRG)

The TRG was initially proposed as a supervising group for the IRSS until such time as a permanent technical body could assist. However, early on it was noted that this would increase cost by creating another IPPC group. The decision was taken by the IPPC Secretariat for the Bureau to provide oversight for the IRSS as it does for other IPPC work programme activities. The TRG was then focused on review of IRSS activities as it relates to the preparation of the Triennial Review Report. The TRG was comprised of representatives of the various IPPC subsidiary bodies as well as IPPC core team leads. The meetings were held during CPM or in conjunction with other subsidiary body meetings to save costs.

## SECTION VII. GOVERNANCE AND ACCOUNTABILITY PROCESSES

Since its inception, the IRSS has built on existing and planned processes already approved by the CPM and in line with an increased focus on strengthening contracting parties' ability to implement their national obligations stipulated in the [IPPC Strategic Framework 2012-2019](#).

The CPM Bureau is responsible for managing the IRSS programme through budgetary oversight and approval of IRSS concept proposals. Each stage of IRSS activity has involved consultation with Secretariat staff, relevant subsidiary bodies and in particular strategic guidance from the CPM, CPM Bureau and the TRG.

### Communications and engagement of stakeholders

Communications outreach was developed for each IRSS activity. Contracting parties were notified prior to survey development and deployment on timely submissions of questionnaires and on survey reviews and products that had been posted on the [IPP](#). Pamphlets and factsheets on the purpose and benefits of the IRSS project were distributed at regional workshops and promoted on the [IPP](#). Promotion of the [IRSS webpage](#), country profiles page and the Question and Answer Forum on the [IPP](#) has been in effect since the inception of the IRSS project and is updated as progress continues.

## SECTION VIII. INTELLECTUAL PROPERTY AND CONFIDENTIALITY

With each IRSS activity involving contracting party responses, the IRSS has been diligent about ensuring confidentiality. Results on each questionnaire response have been presented solely by region and reviews released on IRSS webpage have been made anonymous, unless permission has been granted from a particular contracting party to release their response information. All reviews presented to any multilateral forum are done so anonymously, unless permission is given.

The [IPP Country Profiles webpage](#) contains information provided by the IPPC official contact points and the Food and Agriculture Organization of the United Nations (FAO) centralized statistical database (data.fao.org). The FAO data is automatically updated when there is a change in a statistic in the database. National economic and labor statistics are derived from the World Bank databank. Additionally, a select number of contracting parties that have performed the Phytosanitary Capacity Evaluation (PCE) have also included a PCE section covering phytosanitary and trade data. Official contact points can insert and remove phytosanitary and trade-related statistics from their country profile webpage.

## SECTION IX. LESSONS LEARNED AND RECOMMENDATIONS

### Introduction

The following section aims to group the main conclusions and recommendations into themes. They are mainly of a strategic nature and do not necessarily address individual ISPMs and detailed proposals for technical amendments. However, a number of technical and detailed issues could lead to revisions of individual ISPMs and the reports on the questionnaires can be used to identify such issues. Similarly the following section does not aim to identify individual supporting material which could be developed based on the results of the IRSS implementation review.

The lessons learnt from the IRSS implementation review and its subsequent recommendations have been structured into the following main categories:

- Strategic Issues
- Organizational Matters
- Technical Activities

### Strategic Issues

Strategic issues aim to identify activities which could be added to the IPPC Secretariat work programme or supplement existing activities. They are intended to provide suggestions for directions for future IRSS or capacity building activities and their relation to the standard setting and information exchange areas.

### ***Monitoring of IPPC reporting obligations***

One of the original intentions of the IRSS was for the IPPC Secretariat to monitor, on an ongoing basis, the fulfillment of reporting obligations by contracting parties undertaken through the [IPP](#). It was thought that this would be an effective way to manage reporting obligations by contracting parties by publicizing those who do not fulfill their reporting obligations and thus motivating them to do so.



Despite the availability of sufficient funds provided by the European Commission which would have allowed hiring short term staff to undertake this activity, the IPPC Secretariat did not implement this IRSS activity sufficiently. Some efforts were undertaken to statistically work on the [IPP](#) reporting obligations, but these did not constitute a regular monitoring and did not result in annual reports to the CPM on the fulfillment of reporting obligations.

Recently the IPPC Secretariat and the CPM have recognized again that the fulfillment of reporting obligations is of great importance. In order to carry out this activity in a more structured way and to assist the IPPC Secretariat the NROAG was created. The CPM agreed to this group at CPM 8 (2013). Given this, it should be now be possible to undertake the regular monitoring of reporting obligations to identify contracting parties not fulfilling their obligations on the [IPP](#), so this can be documented in regular CPM reports to motivate them to do so.

***Recommendation 1:***

It is strongly recommended to undertake a regular monitoring of the fulfilment of reporting obligations by contracting parties. Annual reports, including the identification of contracting parties not honouring their reporting obligations, should be provided to the CPM.

***Development of a cross-cutting information exchange policy and work-programme***

Activities under the IRSS, especially under the ISS, very much depends on the ability to distribute information on how to implement ISPMs to those needing it. Information exchange is not just how contracting parties fulfill their reporting obligations, it is also how efficiently this and other information is transmitted to the target audiences.

Within the IRSS information exchange activities have taken place including the establishment of an IRSS webpage on the [IPP](#). The inclusion of country specific trade and social information into the IRSS webpage is thought to help countries in identifying market access issues.

It is considered important that future information exchange channels and strategies are designed in such a way to complement the implementation needs of contracting parties, as well as the information exchange requirements of the IRSS. Information exchange is not a discipline working in isolation and for its own purpose, it is an interdisciplinary tool servicing all aspects of standard development and implementation, including the IRSS.

In order to have the greatest possible impact for the IPPC, involving a coordinated approach between CDC, IRSS, as well as standard setting, the establishment of an information exchange policy and work programme should be considered. The development of such a policy and work programme would be ideally assisted by a CPM appointed body. The already existing NROAG may take on such a role.

**Recommendation 2:**

It is recommended to develop a cross-cutting information exchange policy and work-programme in consultation with the standard development and implementation clusters within the IPPC Secretariat.

***Topical implementation review***

One of the success stories of the first cycle of the IRSS has been the topical approach in investigating the implementation of surveillance provisions. The General IPPC Survey was especially supplemented by a detailed questionnaire on surveillance and further investigated through a symposium and regional workshops. This provided an excellent overview on how ISPM 6 is implemented by different contracting parties and the major implementation challenges. This helps to specifically design implementation support activities through the IPPC and possibly for individual donors such as countries or the WTO Standards and Trade Development Facility (STDF).

Another very positive aspect of an implementation review based on a topic has been that the implementation of other surveillance related or dependent ISPMs have also been reviewed. The implementation of ISPM 4, ISPM 8, ISPM 17 and ISPM 19 are partially dependent on good surveillance systems in place. Without these systems contracting parties would not be able to establish PFAs, determine the pest status in an area or detect and report new pests.

The topical design of the intensified implementation review makes it possible to develop a comprehensive implementation support system for surveillance. The data gathered in the regional workshops and the symposium identified the needs of many contracting parties and had the additional advantage of identifying the target audiences for future training activities undertaken by the IPPC on this subject.

Focusing on a certain or limited number of topics in the IRSS implementation review should be continued. It will provide a deeper understanding of contracting parties' challenges in implementing certain IPPC and ISPM provisions and their relevance to develop and/or maintain a sound plant health system. Topical reviews will also help in designing appropriate and efficient capacity development projects and activities. However, care should be taken to ensure that questionnaires are designed appropriately and results are representative. Lastly, it will also help the CPM to better understand how systematic capacity shortcomings of contracting parties may impact the implementation of existing ISPMs, which may lead to better standard setting.

**Recommendation 3:**

Future implementation review activities should continue to choose certain topics as focal themes.

### ***Diagnostics and taxonomy – an IPPC topic for the future***

One of the major revelations of the questionnaires on surveillance, PFAs and pest status has been the identification of diagnostic and taxonomy shortcomings as major implementation inhibitors for many contracting parties. The lack of diagnostic and taxonomic capacity has direct influences on the ability to do surveillance and associated activities. Also, resource limitations restrict the ability of countries to send samples to other countries' laboratories for diagnostic identification. While an NPPO may understand the provisions of surveillance ISPMs very well, if they don't have access to a sufficiently equipped and run diagnostic laboratory they will not be able to implement this standard fully.

The availability of reliable diagnostic and taxonomic services is not only a problem of developing countries; developed countries also face a continual decline of resources for these disciplines. The lack of reliable diagnostics can also have significant trade implications due to misidentifications. Because of its fundamental importance for almost all phytosanitary activities, not just surveillance, it is essential to address this topic in a much broader sense as a major implementation inhibitor.

In order to determine how the lack of access to reliable diagnostic and taxonomic services prevents or inhibits the implementation of ISPMs, this topic should be investigated at the next cycle of the IRSS. The results of such a focal investigation could serve as a basis to discuss and define a future IPPC policy towards this subject, which may include activities such as standard setting, regional cooperation and capacity building.

#### **Recommendation 4:**

The implementation review of the next phase of the IRSS should focus on investigating the relevance and impact of diagnostic and taxonomic services for the implementation IPPC and ISPM provisions.

### **Organizational Matters**

The lessons learnt from the IRSS implementation reviews are not necessarily limited to the results obtained from the questionnaires or workshops, they also relate to the way the project was implemented by the IPPC Secretariat and the CPM and its subsidiary bodies. The interactions and dynamics in the implementation of this project are important to guide how future activities on implementations may be undertaken. This section seeks to highlight these aspects of the IRSS implementation.

#### ***Organization of capacity building and IRSS activities***

The IRSS project was established by the IPPC Secretariat in a typical project fashion, with a project manager (IRSS Officer) and professional staff; it is anticipated that this structure will be maintained in the next cycle of the project. The project was not established under the capacity development area of the IPPC Secretariat, but was thought to be a cross-cutting activity in its own right. Findings of the IRSS questionnaires were provided to different units within the IPPC Secretariat, the subsidiary bodies and other CPM bodies to enable them to take implementation issues into account.

The IPPC specifies in its Article XX on technical assistance that "contracting parties agree to promote the provision of technical assistance to contracting parties, especially those that are developing contracting parties, either bilaterally or through the appropriate international organizations, with the objective of facilitating the implementation of this Convention". Thus, all IPPC related technical assistance activities provided by contracting parties directly or through the IPPC Secretariat have one major objective - to facilitate the implementation of the IPPC. The IRSS is therefore, quite specifically falling under Article XX of the IPPC because it aims to identify implementation difficulties and then to alleviate them through support activities.

At the CPM 8 (2013) New Zealand presented a paper which promoted greater focus on the implementation of the IPPC and ISPMs. It was advocated that it may now be the time to obtain greater value from the investments made in developing ISPMs by shifting the emphasis of CPM's efforts to focus more on the implementation. The paper proposed greater cooperation and coordination within and between the IPPC Secretariat, CPM, contracting parties and RPPOs to further implementation. It was argued that the CPM will achieve more with a collaborative and well coordinated approach that brings together the full knowledge and resources of the aforementioned parties. CPM 9 (2014) agreed with this approach and that there should be a pilot project on surveillance. An open ended working group was held in 2014 to progress this initiative, which was presented to CPM 10 (2015) for endorsement.

Considering the aim of the IRSS, the objective of the IPPC capacity development activities and the proposal that was made to CPM 9 (2014), it is quite apparent that the activities of the IPPC aiming to further implementation have two major components:

- Identification of implementation difficulties
- Provision of targeted support to eliminate these implementation challenges

It is apparent that a greater effort on the coordination of capacity development activities should be undertaken. It is not sustainable or efficient for the CDC or TRG to independently discuss similar matters, such as the implementation difficulties of contracting parties. It should also be considered that the TRG was only initially proposed as a supervising group for the IRSS until such time as a permanent technical body could assist; the Bureau now has oversight over the IRSS.

The lesson learnt from the implementation review of the surveillance provisions of the IPPC and ISPMs is that there is a strong need for a detailed identification component, which allows support and assistance to be much more focused and targeted to contracting parties challenges. This should result in a much more effective and cost efficient provision of technical assistance.

The CPM should consider if all activities with regard to Article XX should be modeled after the IRSS structure - identification first and then targeted assistance. This would encompass IPPC capacity development activities and those of the IRSS, which possibly would result in an adjustment to the [IPPC National Phytosanitary Capacity Building Strategy](#) and work plan and findings of the IRR. It should also be considered that the IRSS is currently financed through an extra-budgetary contribution and if not received in future years the value of the identification phase of the IRSS may be lost.

Combining the capacity development and IRSS activities may also warrant a change to the supervising structures established by the CPM. It may also mean that the different committees may have to be merged into one body to oversee implementation issues. Such a body should have considerable collaboration with the existing subsidiary bodies and the CPM Bureau. In this context

the creation of a subsidiary body on implementation issues maybe the most appropriate next step. Such a subsidiary body would replace the current CDC and TRG.

**Recommendation 5:**

The CPM should consider merging IPPC capacity development activities with the IRSS into one programme aimed at improving the implementation of IPPC and ISPMs. The CPM should also consider to establish a subsidiary body on implementation issues aimed at supervising all CPM activities directed towards implementation issues.

***Collaboration of standard setting, information exchange and implementation activities***

As described in previous chapters the IRSS is a cross-cutting activity. The results of the implementation review feed into standard setting activities by providing data on implementation challenges experienced, which can be used to improve existing ISPMs, but also be taken into account when designing new ISPMs. Therefore, implementation officers need to be knowledgeable in both capacity developing activities and standard setting. A similar cross-cutting activity is with information exchange. Activities undertaken to improve implementation should be well coordinated and where possible jointly developed with information exchange professionals in order to best present support material to reach target audiences.

As reported in section V there has been ongoing cooperation between information exchange, capacity development, standard setting and the IRSS, with particular visibility between the latter two. On several occasions data obtained from the questionnaires was introduced into the SC discussions on the revision of specifications for individual ISPMs. The cooperation with information exchange was less successful considering that during the first part of the IRSS the monitoring of reporting obligations was not carried out effectively. However, cooperation on website development has taken place to manage this function more effectively in the future.

Historically, the IPPC Secretariat has implemented its work programme through a vertical approach, in which standard setting, information exchange and capacity building activities were carried out separately. This approach may have led to fragmented implementation of the IPPC Secretariat work programme. The cooperation of work activities was not always optimal and inter-segmental competition for resources has occurred. Interestingly, this segmented and competitive approach (often termed silo mentality) has transpired to and been mirrored by the CPM to a certain degree.

The implementation review carried out under the IRSS has provided very clear results, showing that implementation issues can be found within any step of standard development and the IPPC Secretariat work programme. This means that any activity in the IPPC Secretariat work programme should consider an implementation perspective, with specific relevance to the development of ISPMs.

Accepting the importance of implementation issues with regard to standard setting and the IPPC work programme necessitates a change in how these activities are carried out, both by the IPPC Secretariat and the CPM. A structure where these activities are undertaken vertically may not suffice, they instead should be incorporated into the IPPC Secretariat and CPM work programme in a more horizontal cross-cutting approach. This could be achieved by the establishment of project teams for development and implementation of specific ISPMs. Such teams could consist of standard

setting, implementation and information exchange experts. Also the CPM could investigate how the different subsidiary bodies could work and cooperate together.

The apparent cross-cutting nature of the IRSS clearly provides an opportunity and an incentive to investigate more efficient working procedures in the IPPC Secretariat, to achieve work programme activities, while creating synergy through closer cooperation.

**Recommendation 6:**

The CPM and the IPPC Secretariat should investigate on how they can improve their respective working procedures in order to incorporate crosscutting implementation issues into the implementation and development of their work programme.

### Technical Activities

The results of the implementation review of the IRSS demonstrated there are a number of technical activities necessary in order to facilitate the implementation of IPPC and ISPM provisions. These primarily ISPM oriented lessons and recommendations are expanded upon further in this section. It should be noted that the IRSS questionnaires resulted in a multitude of findings on how individual ISPMs could be better implemented or facilitated through specific guidance material. These can be found in the different reports provided by the IPPC Secretariat. This section seeks to highlight only the most important technical conclusions from the questionnaires.

#### ***Improving IRSS questionnaires***

The number of responses to the individual IRSS questionnaires varied considerably, with the response rate of some questionnaires very low. This very low rate may be explained by resource difficulties of coordinating national responses. However, some contracting parties also observed that some questions were difficult to understand, to answer or were considered illogical.

For the questionnaires to be of value to the IPPC Secretariat and the CPM it is important to receive a sufficient number of clear and precise responses in order to make accurate conclusions. This can only be achieved if the quality of the questionnaires is very good and if contracting parties are not overwhelmed with different questionnaires, resulting in fatigue. It should be taken into account that not only IRSS questionnaires contribute to the workload of contracting parties, but also questionnaires for other activities of the IPPC. In order to improve the quality of ISPM related questionnaires their development should be coordinated with SC members (possibly stewards) and be subject to a quality control checks approved by the CPM.

**Recommendation 7:**

In order to avoid questionnaire fatigue and confusing answers the CPM and the IPPC Secretariat should develop a quality control system for IRSS questionnaires and limit the overall amount of questionnaires sent to contracting parties to a sustainable level.

### ***Intensifying implementation efforts for the Near-East region***

Questionnaire responses and analysis on the implementation of reporting obligations show the Near-East Region has considerably more issues of implementing certain IPPC and ISPM provisions than all other FAO regions. Therefore a significant effort is needed in the Near-East region with regard to implementation support.

When undertaking implementation support or other capacity development activities the CPM and the IPPC Secretariat should make special efforts with regard to the Near East region. Also the cooperation with the newly established Near East Plant Protection Organization (NEPPO) should be intensified.

#### **Recommendation 8:**

The IPPC Secretariat and the CPM should attribute special attention to the implementation of IPPC and ISPM provisions in the Near-East region. Implementation assistance to the Near-East region countries and NEPPO should be considered to improve implementation in this FAO region.

### ***Involving small producers and stakeholders***

A particular issue in implementing ISPM 4 and ISPM 6 was identified in certain developing countries due to difficulties in mobilizing and involving farmers and producers in the activities to establish PFAs or conduct surveillance. This may be due to the majority of producers being small subsistence farmers with minimal education and a lack of industry association.

Although a manual on stakeholder involvement is currently being developed under an IPPC managed STDF project, the fundamental nature of the issue relates to all subsistence small farmer relations with the NPPO in developing countries. This is more of an outreach problem for NPPOs rather than a political stakeholder involvement issue. How NPPOs involve small subsistence farming in their activities needs to be considered further, as often the primary objective of most subsistence farmers is to produce enough income to live, rather than a focus to protect plant health. These are topics which may need to be discussed further through either a symposium or workshop and carried out in association with a CPM meeting.

#### **Recommendation 9:**

A global symposium or workshop should address the topic of small farmer involvement in NPPO activities.

### ***Development of a model form for notifications of non-compliance, including e-notifications***

The highest implementation rate of all ISPMs had been recorded for those related to phytosanitary certification. In the General IPPC Survey 90% of contracting parties indicated they implement the IPPC and ISPM 7 and ISPM 12 provisions for issuing phytosanitary certificates with a high degree.

Although there is a high degree of implementation for the issuance of phytosanitary certificates this does not correspond to ISPM 13 notifications of non-compliance (e.g. a pest interception), which are not as strongly implemented. The need to notify of an interception is significant as it allows the NPPO of the exporting country to trace back, identify shortcomings and to establish corrective actions. The amount of non-compliance notifications issued by countries may warrant a standardized notification format within ISPM 13. Also, the transparency issue for phytosanitary import requirements is a subject which deserves more attention in the IPPC Secretariat work programme. Since this is an issue with much wider implications than just non-compliance and emergency measures, it should be looked at from a horizontal perspective within IPPC. The implementation of reporting obligations may address this subject.

Finally, the subject of notifications of non-compliance and emergency measures should also be considered in the context of e-certification. Incorporation of ISPM 13 elements into the newly proposed e-certification format may enhance implementation of this ISPM 13 provisions.

**Recommendation 10:**

The CPM should consider revising ISPM 13 with regard to incorporating a standardized notification format. Such a notification format maybe incorporated into the electronic phytosanitary certification system. The CPM should also consider to intensify efforts concerning the reporting of phytosanitary requirements.

***Clarification concerning lists of regulated pests***

It is interesting that contracting parties' questionnaire responses stated they have a high degree of ISPM 19 implementation for developing lists of regulated pests, as this is not supported by [IPP](#) data, with very few pest lists received. In addition the ISPM 19 questionnaire responses revealed that even after receiving a direct request from exporting countries, such lists are not always provided.

One particular response to the questionnaire is a misunderstanding of establishing lists of regulated pests. Requests received by contracting parties for pests lists not only included regulated pests, but also lists of pests which occur on certain hosts and the production system, but which are not officially controlled. This indicates that there may be misunderstandings on the establishment of lists of regulated pests and guidance provided in ISPM 19 may not be understood by many contracting parties.

In order to enhance the implementation of ISPM 19, as well as the IPPC reporting obligations, the CPM may consider to review ISPM 19 with a view to provide clearer guidance on the establishment of lists of regulated pests and their publication on the [IPP](#).

**Recommendation 11:**

The CPM should consider revising ISPM 19 with a view to provide clearer guidance on the establishment of lists of regulated pests and their publication of the IPP.



### ***Improving PRA implementation***

One of the principles of the international phytosanitary trading system is that phytosanitary measures are technically justified, i.e. based on PRA. It is, therefore very surprising that ISPMs on PRA are only moderately implemented, with only 43% of respondents reported full implementation. The IPPC Secretariat and the CPM have over the years undertaken a number of initiatives to improve the implementation of the PRA provisions in the IPPC and respective ISPMs. The global IPPC workshop on PRA, the development of an online training tool, as well as regional and sub-regional training workshops, which were partially funded by the STDF, are all examples of dedicated activities to further the implementation of PRA provisions.

Perhaps funding difficulties and the lack of trained experts are determining factors in this lack of implementation by many contracting parties, especially in developing countries. The development of sub-regional PRA centers or international rosters of PRA experts may be answers to these implementation difficulties. The CPM should discuss this topic in order to provide guidance on how the implementation of the PRA ISPMs could be improved. The implementation of PRA ISPMs is not only important to the IPPC, but is also crucial in the framework of the SPS Agreement.

#### **Recommendation 12:**

The CPM should consider to establish a dedicated programme to improve the implementation of ISPMs providing guidance on PRA.

### **Final Consideration**

The first cycle of the IRSS and especially the general and topical assessment of implementation difficulties by contracting parties has been an extremely valuable exercise in obtaining detailed information about the reasons why contracting parties cannot implement certain provisions of the IPPC and of ISPMs. The data obtained can be used by the CPM and the IPPC Secretariat to pinpoint implementation support activities, i.e. capacity development. This should help to improve implementation substantially and can serve as a blueprint for future activities of the IPPC Secretariat and CPM with regard to implementation support.

#### **Recommendation 13:**

It is highly recommended that the IRSS is continued in the future and is combined with the current capacity development activities. It is also recommended that the funding of the IRSS should not be dependent on extra-budgetary donations.