**ALTERNATIVE SERVICE DELIVERY (ASD)**

*Discussion paper submitted by Canada*

**BACKGROUND**

1. The traditional model of solely government-based provision of plant protection services may not be sustainable for all countries. Indeed, priority setting, while taking into consideration budget capacity and the appropriate role of government in areas where there is a clear private good, has already led some countries to adopt systematic use of alternative (or third party) service delivery for phytosanitary activities. It seems inevitable that the use of ASD will increase in the future.
2. Where ASD is used to support export certification, importing countries may seek reassurance or need confidence that such approaches are robust and that pest risks are appropriately managed, and assurance that the use of ASD in such circumstances aligns with the principles of the IPPC.
3. Authorization of entities other than national plant protection organizations (NPPOs) to perform specific phytosanitary activities such as inspection, testing, surveillance, and treatment, appears to be becoming increasingly common in various countries throughout the world. Authorization is referred to in the IPPC (Article V.2(a) related to phytosanitary certification) as well as in several ISPMs, such as ISPM 3 *Guidelines for the export, shipment, import and release of biological control agents and other beneficial organisms*, ISPM 7 *Phytosanitary certification system*, ISPM 12 *Phytosanitary certificates*, ISPM 20 *Guidelines for a phytosanitary import regulatory system* and ISPM 23:2005 *Guidelines for inspection*.
4. Regionally, the North American Plant Protection Organization (NAPPO) has recognized the importance of harmonization in the area of ASD and has adopted Regional Standard for Phytosanitary measures (RSPM) 28 *Authorization of Entities to Perform Phytosanitary Services*, RSPM 8 *Authorization of Individuals to Issue Phytosanitary Certificates* and RSPM 9 *Authorization of Laboratories for Phytosanitary Testing*.
5. The IPPC has adopted standards, such as ISPM 36 *Integrated measures for plants for planting*, that operationalize the concept of a systems approach in which not all aspects need be conducted by the National Plant Protection Organization (NPPO).
6. In addition, in the first supplement to the Glossary (ISPM 5) on *Guidelines on the interpretation and application of the concept of official control for regulated pests*, although the supplement relates to the definition of a quarantine pest and its scope is based on the official control of regulated pests, certain provisions may be deemed applicable to the use of ASDs in this regard. This is particularly the case where ASD systems are related to maintaining freedom of an endangered area from a quarantine pest and for issuing phytosanitary certificates in relation to this (and this is consistent with the definition for official control). The guideline indicates that all official control programs have elements that are mandatory and that, at minimum, program evaluation is required. It goes on to elaborate on the mandatory nature of official control and to state that the level of NPPO authority and involvement in official control should be at minimum audited/reviewed by, and have enforcement assured by the NPPO. It also indicates that certain aspects of official control programs may be the responsibility of the private sector. This guideline therefore clearly recognizes that the use of ASD is permissible within the context of the IPPC and official control.
7. However, despite the presence of the guidance referred to above, uncertainty around components of ASD systems and NPPO obligations exists. A current clearly stated boundary of where an ASD may not be applied is with respect to “Public Officers” who are the only individuals who can issue phytosanitary certificates (Article V.2 (a) of the IPPC).
8. It seems clear that many countries are either considering expanded use of ASD systems or are actively implementing them. Therefore, the IPPC must ensure that comprehensive and coherent guidance is developed now in order to maximize consistent understanding and harmonization, implementation and acceptance of ASD-based systems.
9. If, as expected, the use of ASD does become more widespread, the IPPC can anticipate demands for expanding its activities in relation to at least three roles:

* Ensuring that the purpose and responsibility of the IPPC in securing common and effective action to prevent the spread and introduction of pests and promoting appropriate measures is maintained in light of an increasing change in the regulatory approach used by Contracting Parties in the use of ASD;
* Establishing guidelines and standards relating to ASD that will enable Contracting Parties to establish robust ASD programs and to ensure that their trading partners have confidence in these and the means to determine their effectiveness and acceptability;
* Developing implementation tools, including capacity building for developing countries, relating to both establishment and review of ASD systems.

**CURRENT STATUS**

1. Recognizing the importance of ASDs in the future, a topic for a future ISPM, *Authorization of entities other than national plant protection organizations to perform phytosanitary actions* was adopted at CPM-9 (2014) and added to the List of Topics. The draft specification for this topic was sent for member consultation in December 2014 to February 2015. The topic is currently rated as a priority 2 and will be further discussed at the Standards Committee meeting in November 2015.
2. More recently, as a complement to the topic above and based on its identification as a gap in the Framework for Standards and Implementation, Canada has submitted a proposal for a future standard on "Audits in the phytosanitary context". Canada’s second topic proposal on systems approaches for forestry products is also linked since, along with ASD, more implementation of systems approaches that reduce the need for endpoint inspections can be anticipated.
3. Given the above comments, it seems appropriate and opportune for the IPPC to consider the likelihood of an increased use of ASD in the future and to plan how to position the organisation and its standards for this eventuality and to consider the need for implementation-supporting tools.

**NEXT STEPS**

1. Provided the SPG supports continued development of this strategic direction, high priority should be given to the development of standards that support the use of ASD, e.g., *Authorization of entities other than national plant protection organizations to perform phytosanitary actions* and *Audits in the Phytosanitary Context*.
2. The SPG should also consider supporting the development of the tools required to implement the resultant standards. This could include, for example, training and manuals on audits and quality systems management.
3. At minimum, this subject should be considered and discussed carefully by the SPG in light of its developmental work on the next Strategic Framework for the IPPC.