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Food and Agriculture
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منظمة
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**Statements from COSAVE and its member countries regarding various
CPM agenda items**

Agenda items 8.10; 9.2; 9.3 and 16

Prepared by the COSAVE and its member countries

English only

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**STATEMENTS FROM COSAVE AND ITS MEMBER COUNTRIES
REGARDING THE FOLLOWING CPM AGENDA ITEMS**

- ❖ **8.10 “Proposal for a new implementation oversight body - Outcomes of the focus group and SPG and Bureau consideration” CPM 2017/08**
- ❖ **9.2 “Adoption of International Standards for Phytosanitary Measures” CPM 2017/03.**
- ❖ **9.2 “Adoption of International Standards for Phytosanitary Measures - Reorganization, Harmonization and Minor Technical Updates of the Fruit Fly ISPMs”. CPM 2017/19**
- ❖ **9.3 “Topics for IPPC Standards - New topics and adjustments to the List of topics for IPPC standards” CPM 2017/17**
- ❖ **16. “Conceptual Challenges in Standards Development in Terms of Implementation”. CPM 2017/18**

- ❖ **8.10 “Proposal for a new implementation oversight body - Outcomes of the focus group and SPG and Bureau consideration” CPM 2017/08**

COSAVE and its members countries agree the IC be established under the proposed ToR and rules of procedures, but are proposing the following amendments to the proposal, because taking into account the new body will be a CPM subsidiary body, its members should be approved by the CPM. Furthermore, changes to the rule of procedure are proposed in order to keep FAO regional representation:

Appendix 1: Draft Terms of Reference of the IPPC Implementation and Capacity Development Committee (IC) - a subsidiary body of the CPM

3. Composition

The IC is composed of ~~twelve~~^{eleven} experts with relevant skills and experience in implementation of phytosanitary-related instruments and/or capacity development. The ~~Bureau~~^{CPM}, taking account of the balance of skills and experience required, and geographical representation, selects and appoints the members.

Appendix 2 – Draft Rules of Procedure of the IPPC Implementation and Capacity Development Committee (IC) - a subsidiary body of the CPM

Rule 1. Membership

The IC is composed of ~~12~~¹¹ members plus one representative each from regional plant protection organizations (RPPOs) and the Standards Committee (SC) of the International Plant Protection Convention (IPPC).

Members are selected on the basis of a balance of expertise with at least one from each Food and Agriculture Organization of the United Nations (FAO) region and representation from developing countries. Members should have

experience of either implementation of phytosanitary related instruments and/or capacity development and will be selected and appointed by the CPM Bureau.

The distribution for each region will be composed:

- Africa (2)
- Asia (2)
- Europe (2)
- Latina America and the Caribbean (2)
- Near East (2)
- North America (1)
- South west Pacific (1)

Rule 3. Procedure for selection of members

Members serve for a term of three years which may be renewed for an additional term. Members may serve no more than two terms unless a region submit a request to the CPM for an exemption to allow a member for each region to serve an additional term.

Rule 4. Alternate and replacement members

If a member resigns, no longer meets the qualifications for membership set forth in these Rules, or fails to attend two consecutive meetings of the IC, the member~~he or she~~ will be replaced.

Rule 5. Chairperson and Vice-Chairperson

The chairperson and vice-chairperson of the IC are elected by its members and serve for a term of three years with the possibility of re-election for not more than one~~two~~ further terms

Rule 14. Language

Meetings of the IC will be conducted in ~~English.~~ the languages of the organization.

❖ 9.2 “Adoption of International Standards for Phytosanitary Measures” CPM 2017/03.

COSAVE countries do not have formal objections for the adoption of the draft ISPMs proposed in the decision section of document CPM 2017/03.

Notwithstanding the above mentioned, COSAVE countries want to express their concerns regarding the draft ISPM on the *International movement of growing media in association with plants for planting* (2005-004) contained in CPM 2017/03_05, and a few comments on the *International movement of seeds* (2009-003) contained in CPM 2017/03_01

- ***International movement of growing media in association with plants for planting (2005-004)***: the adoption of this draft was formally objected in CPM 10 by Uruguay and supported by the rest of COSAVE member countries. We appreciate efforts made to address this objection by the Steward and the SC, but the version of this draft presented for adoption by the CPM 12 does not differ substantially from the version formally objected in CPM 10.

It remains still unclear what pest risk the draft standard would address, because in some cases the draft outline the pest risk of plant for planting alone rather than those growing media in association with plants for planting. In addition, the draft standard is focused to growing media in which the plants are grown, but does not clearly differentiate from growing media used just for international trade to support plants.

Therefore, we consider that the future standard would have difficulties for its implementation in COSAVE countries.

- ***International movement of seeds (2009-003)***: we suggest some minor technical changes to improve and clarify the draft on the *International movement of seeds (2009-003)* contained in CPM 2017/03_01.

These minor technical changes to the draft on International movement of seeds are presented in the following table for consideration by other member countries. We believe they are needed to further improve the draft.

Para	Current text	Proposed text	Reason
3	Under ISPM 5 (<i>Glossary of phytosanitary terms</i>) seeds (as a commodity class) are intended for planting and not for consumption. Viable seeds, which are a sample of a seed lot, imported for laboratory testing or destructive analysis are also addressed by this standard.	Under ISPM 5 (<i>Glossary of phytosanitary terms</i>) seeds (as a commodity class) are intended for planting and not for consumption. Viable Seeds, which are a sample of a seed lot, imported for laboratory testing or destructive analysis are also addressed by this standard.	For consistency with section 1.3.1
9	Seeds are regularly moved internationally for commercial and research purposes. Therefore, when assessing the pest risk and determining appropriate phytosanitary measures, NPPOs should consider the intended use of the seeds (research, planting under restricted conditions or planting under natural conditions).	Seeds are regularly moved internationally for commercial and research purposes. Therefore, when assessing the pest risk and determining appropriate phytosanitary measures, NPPOs should consider the intended—use purpose of import of the seeds (research, planting under restricted conditions or planting under natural conditions).	There is an entire section in the draft referring the purpose of import, and this should be reflected in the outline of requirements. On the other hand the intended use of seeds is planting.
59	2.4 Treatments	2.4 Phytosanitary treatments	Section 2 refers to phytosanitary measures therefore, this section should refer to seed treatments used as

			phytosanitary treatments
59	2.4.1 Crop treatment	2.4.1 Crop treatment	Section 2.4.1 should be part of section 1.5 “Pest management in seed production”. It is proposed being a new section under 1.5 e.g. 1.5.4
60	Pesticide application to parent plants may be used to prevent seed infestation.	Pesticide application to parent plants may be used to prevent seed infestation.	See previous proposal, this is proposed to be moved under section 1.5
Appendix 1	Category 1(c): Pests carried by the seed, internally or externally, that do not transfer to a host plant under natural conditions	Category 1(c): Non-seed transmitted pests that are carried by the seed, internally or externally, that do not transfer to a host plant under natural conditions	For consistency with the description of the other categories in the Appendix

Finally, COSAVE countries believe that a procedure for these minor technical changes should be developed to be included in the standard setting process to allow countries to make technical comments detected when revising draft standards for CPM adoption that not constitute an objection, but improve the final text presented for adoption.

❖ 9.2 “Adoption of International Standards for Phytosanitary Measures - Reorganization, Harmonization and Minor Technical Updates of the Fruit Fly ISPMs”. CPM 2017/19

COSAVE countries do not agree to the reorganization of the suite of fruit fly ISPMs because the proposed reorganization implies changes that go beyond a reorganization, harmonization and minor technical updates of the Fruit Fly ISPMs. In particular, the incorporation of ISPM 30 into ISPM 35 as Annex 1, for the following reasons:

- The adoption of ISPM 30 was agreed by CPM in 2008. Therefore, it was agreed that the establishment of areas of low pest prevalence for fruit flies (ISPM 30) is a phytosanitary measure by itself for fruit fly risk management.
- Although the establishment of an area of low pest prevalence (ALPP) may be one of the measures of a systems approach, not always the area under a system approach for fruit flies has to meet all the requirements of ISPM 30.
- For the above-mentioned reasons, we do not agree to revoke the ISPM 30.

To be properly analyzed and in order to follow the appropriate procedures, the reorganization should be submitted to member consultation.

Notwithstanding the foregoing, COSAVE countries do not agree with some ink amendments. As an example, in Annex 1 of document CPM 2017/19, changing the term "entry points" by "point of entry" (defined in ISPM 5) is not correct, since in the cases where it is proposed to use "point of entry" the term is not used in the sense of the glossary definition.

On the other hand, consequential changes in the core text of ISPM 35 are not presented.

❖ 9.3 “Topics for IPPC Standards - New topics and adjustments to the List of topics for IPPC standards” CPM 2017/17

1.i) Phytosanitary measures for commodities (2015-002), with priority 1 and IPPC Strategic Objectives A, B and C

COSAVE and its member countries do not agree to add this topic to the list of topics for IPPC standards. They want to recall that CPM-11 required the SC to reconsider this topic as well as other proposals for commodity standards which were made during the 2015 call for topics with further input from the CP who submitted the topic.

The current topic *Phytosanitary measures for commodities (2015-002)* does not differ substantially from that presented during CPM-11 (*PRA for commodities*) and according to the draft specification submitted, if this topic is added to the LOT, a conceptual standard for development of commodity standards will be set up.

This is not in line with the CPM decision that “a standard need not to be tagged as a particular type, such as a commodity standard, but rather focus on defining requirements or guidance for harmonization that are appropriate to the effective management of phytosanitary risks that the standard is intended to achieve and which is defined in its scope”.

❖ 16. “Conceptual Challenges in Standards Development in Terms of Implementation”. CPM 2017/18

COSAVE and its member countries support option A, based on the following:

According to IPPC and ISPMs related to certification, the only document used to ensure the phytosanitary condition of a regulated article is the Phytosanitary Certificate. With the only exception for the specific case of the mark of the treatment of wood packaging.

In addition, ISPM N° 32 makes a distinction between categories of commodities according to their phytosanitary risk, from which it is defined which commodities should be covered by a Phytosanitary Certificate and which not.

We also believe that, creating another certificate other than the Phytosanitary Certificate, not signed by a public official, ensuring the health of the article, will generate important confusion and problems in the regulated commodities trade.