Submission form for topics for Standards and Implementation

*(Updated by the IPPC Secretariat 2018-04-27)*

Name of Country or Organization: United States of America (USA)

Introduction

In Accordance with CPM-13 decision, a combined call for topics for standards and tools for implementation is opened in 2018. IPPC contracting parties and RPPOs are invited to submit proposals for topics to be included as gaps in the Framework for Standards and Implementation for consideration to be put onto the IPPC work programme. Each submission should clearly define the problem needing resolution in sufficient detail to determine how it fits into the Framework for Standards and Implementation and the cost/benefit of the development of the standard or tool. Submitters are requested to consult the current IPPC Framework for Standards and Implementation (<https://www.ippc.int/en/publications/82439/>) to identify areas where the proposal can contribute.

Standards

This form covers submissions for new ISPMs, new components to an existing ISPM and revision or amendments to an ISPM, supplement, annex or appendix, including diagnostic protocols. Please note that a separate call for phytosanitary treatments (PTs) is made, more information on this call is available at <https://www.ippc.int/en/core-activities/standards-setting/calls-treatments/>.

Please refer to the IPPC Standard Setting Procedure Manual[[1]](#footnote-1) for an explanation of the hierarchy of terms for standards (technical area, topic and subject). The list of topics for IPPC standards adopted by the CPM is available at <https://www.ippc.int/core-activities/standards-setting/list-topics-ippc-standards>.

Implementation

This form covers submissions for new IPPC implementation resources for implementation of the Convention, ISPMs and CPM recommendations or for revisions to IPPC implementation resources. Please refer to the IPPC Framework for Standards and Implementation on implementation resources that have been adopted/developed, are under development or are planned to be developed.

Submission

This completed form should be submitted by the IPPC official contact point, preferably via e-mail, to the IPPC Secretariat ([ippc@fao.org](mailto:ippc@fao.org)) no later than **31 August 2018**. Please use one form per topic.

An electronic version of this form is available at <https://www.ippc.int/en/core-activities/standards-and-implementation/call-for-topics-standards-and-implementation/>.

Save and submit the completed submission form as:   
2018\_TOPIC\_*[Country or organization name – Proposed title of topic]*.docx.

(Text in brackets given for explanatory purposes)

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| **Submission form for topics for Standards and Implementation** |
| 1. **Proposed by**: (Name of IPPC Official Contact Point) Mr. John Greifer (USA) |
| 1. **Contact:** (Contact information of an individual able to clarify issues relating to this submission)   Name: Mr John Greifer (USA)  Position and organization: Assistant Deputy Administrator for International Phytosanitary Standards  Mailing address: 1400 Independence Ave SW, Washington, DC 20250, USA  Phone: +1 202 799 7159 Fax: +1 202 690 0472  E-mail: John.K.Greifer@aphis.usda.gov |
| 1. **Proposed Topic (Choose one box only)**   [\_\_] Standard **(go to 4)** [\_X\_] Implementation resource **(go to 5)** |

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| 1. **Standards**    1. **Type of topic: (Choose one box only)** | | |
| A. New ISPM:  [\_\_] Concept  [\_\_] Pest specific  [\_\_] Commodity specific  [\_\_] Reference | B. New component to an existing ISPM:  [\_\_] Supplement  [\_\_] Annex  [\_\_] Appendix  [\_\_] Technical panel (technical area)  [\_\_] Diagnostic protocol (subject) | C. Revision/Amendment of:  [\_\_] ISPM  [\_\_] Supplement  [\_\_] Annex  [\_\_] Appendix |
| **Draft specification:**  As agreed by CPM-7 (2012) and CPM-11 (2016), submissions in answer to the call for topics (except for draft diagnostic protocols, which are subject to additional criteria, see below) should be accompanied by a draft specification. Proposals for phytosanitary treatments are submitted using a different submission form in a separate call: <https://www.ippc.int/en/core-activities/standards-setting/calls-treatments/>.  An annotated template for the draft specification for Standards is available on the IPP (<https://www.ippc.int/en/publications/81324/>) in English, French and Spanish.  **(go to 6)** | | |

**OR**

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| 1. **Implementation**    1. **Type of topic: (Choose one box only)** | |
| 1. New implementation resource:   [X] Guide (e.g. Manual)  [\_\_] Training material (e.g. e-Learning)  [\_\_] Awareness material  [\_\_] Other (Please specify ) | 1. Revision of implementation resource   [\_\_] Guide (e.g. Manual)  [\_\_] Training material (e.g. e-Learning)  [\_\_] Awareness material  [\_\_] Other (Please specify ) |
| * 1. Featured Convention articles, ISPMs and CPM recommendations in the proposed implementation resource   [\_\_] for Convention articles (Please specify )  [\_X] for ISPM (15)  [\_\_] for CPM Recommendation (Please specify ) | |
| **Draft outline:**  Submissions for topics on implementation should be accompanied by a draft outline of implementation resource defining a scope and purpose, or a draft implementation resource. Commitment for financial/in-kind resources to support the development of the implementation resource may be included in the submission (non-obligatory).  **(go to 6)** | |

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| **6. Proposed title of document** *ISPM 15 implementation guidelines for non-compliance* |
| **7. Proposed priority**  [X] 1 (high) [\_\_] 2 [\_\_] 3 [\_\_] 4 (low)  Comments:  Harmonization is needed to provide consistency in the implementation of ISPM 15 and to provide data that can be used to accurately measure and track the effect of the standard. |
| **8. Featured outcome of standard/implementation resource:** Harmonized guidance will be developed on what should be considered and reported as actual non-compliances for ISPM 15 versus other bases for quarantine action and what actions (justified or not). The guidance will explain the decision-making process supported by examples. This will lead to consistency in proper interpretation and implementation of ISPM 15 and will provide data that can be used to accurately measure and track the effect of implementation of this standard. |
| **9. Contribution to filling the gaps of the Framework for Standards and Implementation:** (2 lines max)  The guidance will supplement implementation needs in lines 11 and 69 of the Framework covering harmonization needs in both non-compliance reporting and the Explanatory Document for ISPM 15. |
| **10. Summary of justification for the proposal** (2 lines max) There is currently no harmonized understanding of non-compliance for ISPM 15, especially when it relates to pest presence. While some of pests may require action if detected, pests interceptions do not always represent non-compliance with ISPM 15. |

**Criteria for justification and prioritization of proposed topics[[2]](#footnote-2):**

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| Submissions should address the applicable criteria for justification of the proposal (as listed below). Where possible, information in support of the justification and that may assist in the prioritization should be indicated.  All core criteria must be addressed; supporting criteria should be addressed if applicable.  Priority will be given to topics with the largest global impact. |
| **Core criteria (must provide information. It is expected that all submissions meet the following core**  **criteria)** |
| Contribution to the purpose of the IPPC as described in article I.1.  *The Guidelines will secure common and effective action to prevent introduction and spread of pests via movement of wood packaging material. This will be achieved by ensuring harmonized approach to correctly identifying and responding to non-compliance for ISPM 15. This will prevent disagreements between NPPOs over which non-compliance reporting is justified and secure the correct phytosanitary actions.* |
| Linkage to IPPC Strategic Objectives (SOs) and Organizational results demonstrated.  *The Guidelines will help improving phytosanitary capacity of NPPOs in accomplishing main IPPC Strategic Objectives, i.e., protecting environment from introduction and spread of tree pests and by facilitating safe trade in wood commodities that are pest free.* |
| Feasibility of implementation at the global level (consider ease of implementation, technical complexity, capacity of NPPO(s) to implement, relevance for more than one region).  *The ISPM 15 is already globally implemented. The new guidance will further improve its implementation by harmonizing the understanding of what actual non-compliance for this standard is and by providing examples of decision making under different circumstances.* |
| Clear identification of the problems that need to be resolved through the development of the standard or implementation resource.  *Substantial debate surrounds the impact and effectiveness of ISPM 15 implementation, including the findings of trading partners regarding compliance and information collected and analyzed by academics and others on the national or global significance of the standard. While the plant pest risk associated with wood packing has been certainly substantially reduced through the implementation of ISPM 15, the questions remain on how well it is working, whether it provides enough protection, and does it reduce trade friction. The data needed to answer these questions come largely from the operational results of implementation which involves national records on incidents of non-compliance. Unfortunately, there is currently no harmonized understanding of non-compliance for ISPM 15 and therefore no reliable data from which to judge the effect of the standard.*  *The pest risk management design of ISPM 15 is widely misunderstood to establish an international appropriate level of protection (ALOP). It does not. ISPM 15 establishes a level of risk mitigation that all countries have agreed will be a baseline. It will be stronger than needed for many and less than adequate for others. The level of non-compliance in implementation is key to whether the standard achieves its intended effect (high compliance) or is substantially weakened for all countries (low compliance). Clear agreement on the definition of compliance is therefore essential.*  *Each of the treatments in ISPM 15 have different levels of efficacy for different pests in different woods under different conditions. This makes it impossible to have a one-size-fits-all definition. There are however certain clear points of non-compliance that can be agreed. First is that wood without the requisite stamp or with an unauthorized stamp is non-compliant whether or not pests are found. Likewise, with the presence of excess bark. The difficulty comes with* *pest presence.*  *As stated above, ISPM 15 is not effective for all wood pests. For instance, it was not intended to address secondary invaders like termites, carpenter bees, or snails. Although these pests may require action if detected, they do not represent non-compliance with ISPM 15. Other pests may be “green wood” pests but are outside the efficacy range for ISPM 15 treatments (e.g., some insects, deep-wood fungi). These also may require action but should not count as ISPM 15 non-compliance. Some countries take action on wood packing based only on signs of pests (e.g., holes, galleries, frass, stain). In the absence of a live pest, the justification for such actions is challengeable, as is the record of non-compliance with ISPM 15.* |
| Availability of, or possibility to collect, information in support of the proposed standard or implementation resource (e.g. scientific, historical, technical information, experience). *Information should be available globally from NPPOs who have polices for their actions and records of non-compliance notifications.* |

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| **Supporting criteria (information may be provided, as appropriate):** |
| **Supporting criteria (Practical)**   1. Is there a regional standard and/or implementation resource on the same topic already available and used by NPPOs, RPPOs or international organizations. 2. Availability of expertise needed to develop the proposed standard and/or implementation resource.   *Expertise is available internationally, including from NPPOs, TPFQ, and IFQRG.* |
| **Supporting criteria (Economic)**   1. Estimated value of the plants protected. 2. Estimated value of trade including new trade opportunities affected by the proposed standard and/or implementation resource (e.g. volume of trade, value of trade, the percentage of Gross Domestic Product of this trade) if appropriate.   *The total value of minimally processed wood products exported globally in 2017 was $80,612,766,080 ($80.6 billion USD) (Source FAO Stat).*  *The new implementation guidelines will decrease the trade friction by reducing the number of unjustified non-compliance reports.* |
| **Supporting criteria (Environmental)**   1. Utility to reduce the potential negative environmental consequences of certain phytosanitary measures, for example reduction in global emissions for the protection of the ozone layer. 2. Utility in the management of non-indigenous species which are pests of plants (such as some invasive alien species). 3. Contribution to the protection of the environment, through the protection of wild flora, and their habitats and ecosystems, and of agricultural biodiversity.   *The devastating effects of the invasive pests of* Agrilus planipennis *and*  Anoplophora glabripennis *in North America, and pine wilt disease caused by* Bursaphelenchus xylophilus *in the Republic of Korea, the damage that these pests introduced by wood packaging material before the adoption of ISPM 15 or non-compliance of ISPM 15 has been clearly documented and demonstrated. Additionally, the benefits of compliance are significant (Haack et al., 2014).* |
| **Supporting criteria (Strategic)**   1. Extent of support for the proposed standard and/or implementation resource (e.g. one or more NPPOs or RPPOs have requested it, or one or more RPPOs have adopted a standard on the same topic). 2. Frequency with which the issue to be addressed, as identified in the submission emerges as a source of trade disruption (e.g. disputes or need for repeated bilateral discussions, number of times per year trade is disrupted).   Unjustified non-compliance reports   1. Relevance and utility to developing countries. 2. Coverage (application to a wide range of countries/pests/commodities). 3. Complements other standards and/or implementation resources (e.g. potential for the standard to be used as part of a systems approach for one pest, complement treatments for other pests).   *The proposed Guidelines will complement an implementation tool for harmonization of non-compliance intended in the Framework for Standards and Implementation for further development.*   1. Conceptual standard and/or implementation resource to address fundamental concepts (e.g. treatment efficacy, inspection methodology).   *The Guidelines would have a global effect on estimating the effectiveness of ISPM 15 implementation and adjusting the phytosanitary measures where necessary.*   1. Urgent need for the standard and/or implementation resource.   *The guidelines are needed urgently because unjustified non-compliance reports deflect from the effectiveness of the ISPM 15 implementation, increase costs and slow the trade.* |
| **Diagnostic protocols are subject to additional criteria. For proposals for DPs, please elaborate on the following criteria to help the future consideration of the subject proposed:**   * Need for international harmonization of the diagnostic techniques for the pest (e.g. due to difficulties in diagnosis or disputes on methodology) * Relevance of the diagnosis to the protection of plants including measures to limit the impact of the pest. * Importance of the plants protected on the global level (e.g. relevant to many countries or of major importance to a few countries). * Volume/importance of trade of the commodity that is subjected to the diagnostic procedures (e.g. relevant to many countries or of major importance to a few countries). * Other criteria for topics as determined by CPM that are relevant to determining priorities * Balance between pests of importance in different climatic zones (temperate, tropics etc.) and commodity classes. * Number of labs undertaking the diagnosis. * Feasibility of production of a protocol, including availability of knowledge and expertise. |
| **Literature review**[[3]](#footnote-3) (This section will provide a **summary of the topic** based on scientific and technical publications, including a referenced **list of literature reviewed**. This will help provide the scientific basis for the content of the standard/implementation resource to be used by the selected experts during the development of the standard/implementation resource)**.** |

**Send submissions to:** **Address:** IPPC Secretariat (AGDI)

**E-mail:** [ippc@fao.org](mailto:ippc@fao.org) Food and Agriculture Organization of the UN

(Subject line: “Call for topics 2018”) Viale delle Terme di Caracalla

00153 Rome, Italy

**DRAFT OUTLINE FOR IMPLEMENTATION GUIDE: ISPM 15 implementation guidelines for non-compliance ([Topic no.])**

**Status box**

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| This is not an official part of the guide and it will be modified by the IPPC Secretariat after approval | |
| **Date of this document** | 2018-08-23 |
| **Document category** |  |
| **Current document stage** |  |
| **Major stages** |  |
| **Steward history** |  |
| **Notes** |  |

**Title**

1. ISPM 15 implementation guidelines for non-compliance.

**Reason for the implementation guide**

1. The Guidelines will secure common and effective action to prevent introduction and spread of pests via movement of wood packaging material. This will be achieved by ensuring harmonized approach to correctly identifying and responding to non-compliance for ISPM 15. This will prevent disagreements between NPPOs over which non-compliance reporting is justified and secure the correct phytosanitary actions.

**Scope**

1. Harmonized guidance will be developed on what should be considered and reported as actual non-compliances for ISPM 15 versus other bases for quarantine action and what actions. The guidance will explain the decision-making process supported by examples. This will lead to consistency in proper interpretation and implementation of ISPM 15 and will provide data that can be used to accurately measure and track the effect of implementation of this standard.

**Purpose**

1. ISPM 15 is already globally implemented. The new guidance will further improve its implementation by harmonizing the understanding of what actual non-compliance for this standard is and by providing examples of decision making under different circumstances.

**Provision of resources**

1. Funding for the meeting may be provided from sources other than the regular programme of the IPPC (FAO). As recommended by ICPM-2 (1999), whenever possible, those participating in standard setting activities voluntarily fund their travel and subsistence to attend meetings. Participants may request financial assistance, with the understanding that resources are limited and the priority for financial assistance is given to developing country participants. Please refer to the *Criteria used for prioritizing participants to receive travel assistance to attend meetings organized by the IPPC Secretariat* posted on the International Phytosanitary Portal (IPP) (see <https://www.ippc.int/en/core-activities/>).

**Collaborator**

1. To be determined.

**Expertise**

1. Five to seven experts with a wide knowledge and experience in the implementation of ISPM 15.

**Participants**

1. [To be determined.]

**References**

1. The IPPC, relevant ISPMs and other national, regional and international implementation guides, standards and agreements as may be applicable to the tasks, and discussion papers submitted in relation to this work.

**Discussion papers**

1. Participants and interested parties are encouraged to submit discussion papers to the IPPC Secretariat ([ippc@fao.org](mailto:ippc@fao.org)) for consideration by the EDG.

1. IPPC Standard Setting Procedure Manual URL: <https://www.ippc.int/en/publications/85024/> [↑](#footnote-ref-1)
2. As agreed by CPM-13 (2018) [↑](#footnote-ref-2)
3. As agreed by CPM-7 (2012) and CPM-11 (2016). [↑](#footnote-ref-3)