



## IPPC Webinar

### **Discussion paper: Development of the draft standard on authorization of non-NPPO entities to perform phytosanitary actions**

*(Prepared by Stephen Butcher, New Zealand in 2020)*

#### **History**

- [1] In 2013 the Standards Committee (SC) recommended to CPM that the topic *Authorization of non-NPPO entities to perform phytosanitary actions* be added to the work programme.
- [2] In 2014, CPM-9 added the topic *Authorization of non-NPPO entities to perform phytosanitary actions* (2014-002) to the work programme with priority 3. Recognising the importance of the topic, CPM-10 changed the priority to priority 2 in 2015.
- [3] SC approved Specification 65 (*Authorization of entities to perform phytosanitary actions*) in 2016 and an expert working group (EWG) drafted the ISPM in 2017.
- [4] The draft ISPM was reviewed by the SC and sent for first consultation in 2018.
- [5] The draft ISPM was then reviewed by SC-7 and sent for second consultation in 2019.
- [6] The importance and value of the topic was reflected in the Strategic Framework for the International Plant Protection Convention (IPPC) 2020-2030 (SF). The SF recognized that NPPOs may not have sufficient resource to conduct all necessary or desired activities, especially during pest outbreaks and other emergencies.

#### **Comments from Contracting Parties**

- [7] The development of the draft ISPM has followed the normal standard setting process. Contracting Parties (CPs) have provided comment during the development of the specification, through the establishment and conduct of the expert work group, through two rounds of consultation on the draft ISPM, and in the development of the 202-2030 SF.
- [8] Some CPs have raised concerns that this proposed ISPM will have undesired effects on their operations, while others have recognized that authorizing non-NPPO entities has become a common practice, especially to overcome resource constraints.

## Discussion

- [9] In the absence of harmonized guidance, NPPOs have used a variety of systems for authorizing non-NPPO entities. These varying systems have resulted in widely varying levels of oversight, control and verification. This variation could contribute to a reduced confidence in the reliability of actions undertaken by non-NPPO entities. This in turn could lead to trade difficulties where importing countries impose additional import requirements to increase their confidence in the safety of the import.
- [10] Authorizing non-NPPO entities is not a requirement for CPs, and the decision whether to authorize such entities lies with the NPPO. These elements are recognized in the IPPC Strategic Framework:
- authorizing non-NPPO entities to perform phytosanitary actions is voluntary
  - the decision to authorize (or not) lies with the NPPO.
- [11] Authorizing non-NPPO entities to perform phytosanitary actions does not remove the existing obligations and responsibilities of the NPPO for those actions.
- [12] While the phytosanitary actions may be performed by a non-NPPO entity, the oversight, control and verification remain the responsibility of the NPPO. The NPPO is responsible for providing assurance that the activities are appropriately performed and meet relevant ISPM guidance.

## Summary

- Authorising non-NPPO entities to perform phytosanitary actions is voluntary and there is no obligation for a NPPO to authorise non-NPPO entities if it does not desire to.
- The responsibility for oversight and assurance that the phytosanitary actions are properly performed by a non-NPPO entity remains with the NPPO.
- Providing harmonised guidance for NPPOs who wish to authorise non-NPPO entities to perform phytosanitary actions will increase the assurance that such actions have the appropriate oversight, control and verification.