Submissions for topics for Standards and Implementation

1. General information

Submission number	2021-001
Title of Proposal	Guide on Performing Audits in the Phytosanitary Context
Submitted by	IPPC Contracting Party Canada
Submission supported by	USDA-APHIS: United States of America SENASICA - Mexico North American Plant Protection Organization

2. Contact information

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3. Summary of proposal

Summary of justification for the proposal	The draft ISPM on audit in the phytosanitary context is currently undergoing its second round of consultation (as of July 2021). In its report dated June 2019, the EWG in charge of drafting the standard identified a number of potential implementation issues, including the need for audit guidance tools and the need for auditor training resources. In addition, the potential for resistance from a number of NPPOs in delegating responsibilities to third-party entities was also identified in the report and recommendation to identify the reasons for such resistance and solutions to address them was recommended by the EWG. The concept of audit in the phytosanitary context is being adopted by an increasing number of Contracting Parties (CP) in a variety of activities conducted as part of their national phytosanitary systems. Audits are also referenced in the newly adopted IPPC Strategic Framework 2020-30 under Development Agenda Item 8.2 Commodity- and Pathway-specific ISPMs, and item 8.4 Developing guidance on the use of third-party entities. We therefore would like to propose the development of a guide to support the implementation of the ISPM on audit through a broader comprehension and adoption of the concept of audit in the phytosanitary context by the CPs. The development of the guide will go hand in hand with the development of the draft ISPM, which is in its final stages prior to adoption by CPM.
Expected outcome of standard / implementation resource	A guide is developed and the concept of audit in the phytosanitary context is understood and accepted by a larger number of CPs as a result, and they have the capacity to implement it as part of their national phytosanitary activities.
Contribution to filling gaps in the Framework for Standards and Implementation	Key result area C3: NPPOs have built capacity and been supported to establish phytosanitary export assurance and phytosanitary certification systems that are robust and are trusted by trading partners. Development agenda 4: Developing guidance on the use of third-party entities

4. Type of proposed material

Proposed material	Implementation resources
Type	New implementation resource Guide Convention articles: Article V – Phytosanitary Certification 2(a) ISPM: Draft ISPM on Audit in the Phytosanitary Context, ISPM 14, ISPM 20, ISPM 45

5. Literature review

Literature review	• The IPPC, relevant ISPMs and other national, regional and international standards and agreements as may be applicable to the tasks, and discussion papers submitted in relation to this work. • ISO (International Organization for Standardization). 2009–2015. IS0 9000: International standards for quality management. Geneva, Switzerland, ISO. • Draft ISPM on audit in the phytosanitary context. • ISPM 14, 2002. The use of integrated meaures in a system approach for pest risk management. Rome, IPPC, FAO. • ISPM 20. 2017. Guidelines for a phytosanitary import regulatory system. Rome, IPPC, FAO. • ISPM 36. 2016. Integrated measures for plants for planting. Rome, IPPC, FAO. • NAPPO (North American Plant Protection Organization). 2014. Authorization of entities to perform • phytosanitary services. Regional Standard for Phytosanitary Measures (RSPM) 28. (The section on audit may be particularly helpful.) • National Plant Protection Organizations in-house training programmes on audits (would require a call for resources as they may not all be publicly accessible).

6. Criteria for justification and prioritization of proposed topics

6.1. Core criteria

Core Criteria	Information provided by Submitter
1. Contribution to the purpose of the IPPC as described in article I.1	Audits are essential tools to prevent the spread and introduction of pests of plants and plant products and are increasingly being used by CPs in order to optimize resources. The concept of 'audit' is referenced in numerous adopted ISPMs, including ISPM 45: Requirements for national plant protection organizations if authorizing entities to perform phytosanitary actions. The proposed guide would aim to provide a common interpretation of the upcoming standard as well as case studies, thereby increasing trust and facilitating trade among contracting parties.
2. Linkage to IPPC SOs and Organizational results demonstrated	Arguments could be made to indicate that all three SOs would be served well by a guide on audits, however, SO "C" (Facilitate Safe Trade Development and Economic Growth) is the one that has the strongest linkage with the proposed guide. A common understanding of the concept of audits and of the newly adopted ISPM, supported by examples of audit schemes that are currently in use worldwide, would certainly assist with a wider use of audits, which would in turn increase trust and facilitate trade amongst CPs. The use of audits in certain sectors of phytosanitary activities will help save limited resources and promote economic growth of CPs.
3. Feasibility of implementation at the global level	Partially in response to shrinking resources available to them and with the objective of being more efficient, NPPOs have been leaders in innovative approaches to regulations and this has included using audits to authorize third party entities to act on their behalf (ISPM 45), using systems approaches supported by audits (ISPM 14 and 36), and audit of production/treatment procedures in exporting countries (ISPM 20). An increasing number of CPs have adopted the use of audits as part of their phytosanitary activities, have included audits as part of their import requirements, and therefore have performed audits and developed training material for their own workforce.

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	Some CPs performing foreign site audits might also have provided training to their trading partners. Other international organizations (e.g. International Organization for Standardization - ISO) have undertaken significant work in this area and have developed training material, which could be modified for the use in the phytosanitary context. The above suggests that there is a significant amount of training material from which an EWG could base its work upon when developing the guide, making this topic relatively easy to implement.
4. Clear identification of the problems that need to be resolved through the development of the standard or implementation resource	The expected adoption of the draft ISPM on audit in the phytosanitary context provide a clear opportunity to develop an associated guide to ensure a proper understanding of the ISPM and the concept of audit. CPs are increasingly using audits to authorize third party entities to act on their behalf, to support systems approaches, and to verify conformity of production/treatment procedures in exporting countries, signaling a need to ensure a common interpretation and implementation of the ISPM in order to maintain the strong trust and understanding that occurs between contracting parties.
5. Availability of, or possibility to collect, information in support of the proposed standard or implementation resource	Many NPPOs have significant experience in audit in the phytosanitary context and have developed in-house training programs for their workforce, which will be useful when developing the proposed guide. RPPOs may have training material on audit. While the International Organization for Standardization (ISO) has a suite of standards (IS0 9000: Quality management) and private firms (e.g. SGS, BSI) have developed their own training material, these are subject to intellectual property restrictions and would require adaptation to the phytosanitary world.

6.2.Supporting criteria

Supporting Criteria	Information provided by Submitter
Practical	1) NAPPO's RSPM 28: Authorization of entities to perform phytosanitary services, contains a section on audit which may be particularly helpful. 2) Many NPPOs have significant expertise with audit in the phytosanitary context and have audits experts, including certified lead auditors that could contribute to the guide. It may also be helpful to include expertise from other international organizations such as ISO.
Economic	1) Up to $1.1 trillion worth of agricultural products are traded internationally each year and a guide supporting the ISPM on audits could facilitate much of this trade, also providing greater trust in the systems of trading partners involved in the trade of these products. 2) See above answer. While difficult to quantify, a wide adoption of the concept of audits worldwide has the potential to increase trade exchanges in most if not all plants and plant products worldwide.
Environmental	1) A common understading of audits will facilitate their implementation as alternatives to treatments that have negative environmental consequences e.g. methyl bromide fumigation. 2) A common understanding of audits will facilitate their implementation as phytosanitary measures that aim at preventing the introduction and spread of pests of plants and plant products. 3) A common understanding of audits will facilitate their implementation implementation to prevent the spread and introduction of pests of plants and plant products, which in turn contributes to the protection of the environment and biodiversity.

Supporting Criteria	Information provided by Submitter
Strategic	1) Canada's experience with the implementation of audits as part of phytosanitary measures and import requirements has demonstrated that the concept is sometimes difficult to understand by its trading partners. Discussions at various fora in the past seems to indicate that similar situations are experienced by many CPs. It is anticipated that the guide will by supported by many. 2) A different understanding of audit principles has led to trade disruptions or interruption of new market access for many Canadian plant products. Similar situations in other countries have likely happened as well. 3) The guide on audits would be relevant to all countries, in particular developing countries which may not have experience with audits in the phytosanitary context. 4) The guide would apply to all countries, pests, and commodities. 5) The guide would primarily complement the draft standard on audits in the phytosanitary context. It would also complement all the ISPMs which make reference to the concept of "audit": ISPMs 2, 3, 4, 5, 6, 7, 10, 11, 12, 14, 15, 18, 20, 21, 22, 23, 24, 26, 30, 33, 34, 36, 41, 42, 43, 44 and 45. 6) The anticipated adoption of the draft ISPM on audits in the phytosanitary context will create a need for guidance in the implementation of the concept. 7) Guidance on audit in the phytosanitary context is a gap that is identified in the Framework for Standards and Implementation. The associated draft ISPM is considered a priority 1.