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COMMISSION ON PHYTOSANITARY MEASURES

Sixteenth Session

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**Adoption of International Standards for Phytosanitary Measures (ISPMs) -
comments from Japan**

Agenda item 9.2

Prepared by Japan

Statement from Japan on Draft ISPM: Audit in the phytosanitary context (Agenda item 9.2)

1. At the Sixteenth Session of the Commission on Phytosanitary Measures (CPM-16), Japan would like to share with the Contracting Parties its proposal on the agenda item 9.2 “Adoption of International Standards for Phytosanitary Measures (ISPMs)”, specifically to the draft ISPM on audit in the phytosanitary context (2015-14).

2. As described in the section 1. “Purpose of an audit”, the proposed ISPM covers three types of audits:

- 1) audit to the NPPO’s own systems and procedures;
- 2) audit to the systems and procedures of entities that have been authorized by the NPPO; and
- 3) audit to the systems and procedures of the NPPO of an exporting country.

3. The requirements for the three types of audits are set up all together in this standard except for only section 4. “Roles and responsibilities”. Japan however thinks that the whole requirements should be described separately for the audit in its own territory (2. 1) and 2) above) and for the audit in an exporting country (2. 3) above) as per the following reasons:

- There is a significant difference between the natures of the audit in its own territory and the audit in an exporting country.
- The audit in an exporting country requires coordination between an auditee country and an auditing country.
- The audit in an exporting is directly related to an international trade.
- The audit in its own territory should comply with rather national legislations than international standards.

4. For example, the steps in the audit process are considerably different between two types of audits. A notification should be made prior to the audit in an exporting country without any exemption, while an unscheduled audit may be conducted in its own territory where there is a critical nonconformity as described in Section 11.1.1 scheduling of audits.

5. For reference, Codex has separate standards for monitoring the national food control system (CAC/GL 91-2017) and for assessment of foreign official inspection and certification system (CAC/GL 26-1997 Annex) although they don’t necessarily focus on audit.

6. Japan feels regrettable that Japan is making the comment in the last stage without having provided this comment during the previous country consultations, however this point has been noticed during the final review of the standard and identified as an important issue to raise in the CPM.

7. Based on the above background, Japan would like to suggest revising the ISPM to describe separately the requirements for the audit in its own territory and for the audit in an exporting country.

8. The CPM is invited to:

- 1) review the statement from Japan on Draft ISPM “Audit in the phytosanitary context”
- 2) discuss and decide whether the draft ISPM should be revised to separate the requirements between the audit in its own territory and the audit in an exporting country.

Statement from Japan on Draft ISPM: Commodity-specific standards for phytosanitary measures (Agenda item 9.2)

1. At the Sixteenth Session of the Commission on Phytosanitary Measures (CPM-16), Japan would like to share with the Contracting Parties its proposal on the agenda item 9.2 “Adoption of International Standards for Phytosanitary Measures (ISPMs)”, specifically to the draft ISPM on commodity-specific standards for phytosanitary measures.

2. The section 4 of the draft ISPM reads:

4. Confidence in the effectiveness of measures

Options for phytosanitary measures are categorized by the TPCS according to confidence in the effectiveness of measures. Effectiveness of the measures is evaluated based on criteria developed and revised as necessary by the TPCS.

3. It is considered that the above-mentioned criteria for evaluation of the effectiveness of the measures developed by the Technical Panel for Commodity Standards (TPCS) is one of the core elements of this standard because it may be directly linked to the reliability of measures in a commodity standard for contracting parties and it will consequently influence whether the countries parties are willing to use the measures in an actual trade. It is, however, unclear whether and how the criteria will be shared with the contracting parties. Japan thinks that it will be better for the criteria to be developed in a transparent manner given the importance of the criteria.

4. Japan, therefore, would like to suggest that the criteria be shared with CPM for its review and approval after TPCS develops the draft criteria. Regarding the form of presentation of the criteria, it could be:

- 1) an additional part of the ISPM such as “Supplement” or “Annex”;
- 2) a part of “IPPC Procedure Manual for Standard Setting”; or
- 3) any other means (e. g. information on IPP).

5. Among them, Japan recommends that it be presented as 1) an additional part of the ISPM such as “Supplement” or “Annex” because this will ensure the transparent process in line with the IPPC standard setting process. “Annex” is supposed to be used for an individual commodity standard, so “Supplement” may be used when appropriate. Please see below, for CPM’s consideration, the quotation about “Supplement” and “Annex” of the Section 4.1 “Recommendations on use of supplements, annexes and appendixes in ISPMs of the “IPPC Procedure Manual for Standard Setting (Jan 2021)¹”.

4.1 Recommendations on use of supplements, annexes and appendixes in ISPMs

Supplement

Criteria for the formation, content and subsequent change of supplements

- *Supplements are the mechanism that the CPM uses in certain situations to add conceptual information that is supplemental to a standard and that provides additional text without changing existing text.*

Annex

Criteria for the formation, content and subsequent change of annexes

- *An annex adds technical information to the standard. It is referred to in the main text of the standard.*
- *Annexes may provide technical guidelines for phytosanitary treatments or procedures, including treatments, treatment schedules and diagnostic protocols.*

6. If the CPM agrees with the above, Japan would like to suggest adding a text (underlined) to the ISPM as follows:

¹https://assets.ippc.int/static/media/files/publication/en/2021/01/IPPCProcedureManual_StSet_2020_2021-01-18.pdf

4. Confidence in the effectiveness of measures

Options for phytosanitary measures are categorized by the TPCS according to confidence in the effectiveness of measures. Effectiveness of the measures is evaluated based on criteria developed and revised as necessary by the TPCS (the criteria are provided in Supplement 1 (or Annex 1)).

7. The CPM is invited to:

- 1) review the statement from Japan on Draft ISPM “Commodity-specific standards for phytosanitary measures”
- 2) discuss and decide whether the criteria for evaluation of the effectiveness of the measures should be shared with CPM for its review and approval after TPCS develops the draft criteria, possibly as an additional part of the ISPM such as “Supplement” or “Annex”.