



Technical issues that are not formal objections regarding draft ISPMs presented for adoption by CPM

COMMISSION ON PHYTOSANITARY MEASURES

NINETEENTH SESSION

DISCUSSION PAPER TO ADDRESS TECHNICAL ISSUES THAT ARE NOT FORMAL OBJECTIONS REGARDING DRAFT ISPMs PRESENTED FOR ADOPTION BY THE CPM

AGENDA ITEM 9.1.3

(Prepared by the Standards Committee and the IPPC Secretariat)

Background

- [1] During the Eighteenth Session of the Commission on Phytosanitary Measures (CPM-18) in 2024, some contracting parties (CPs) submitted an information paper noting that draft International Standards for Phytosanitary Measures (ISPMs) approved by the Standard Committee (SC) for adoption by the CPM could be improved or adjusted before the CPM meeting, when any CP considers it necessary and can provide the necessary technical justification after the three-week deadline for submission of technical justification before the CPM session.
- [2] In the past, adjustments to draft standards during CPM meetings were made during evening sessions in which concerns and proposals from CPs before adoption were addressed. However, the CPM agreed that there should be no drafting of ISPMs during CPM meetings, as evening sessions did not have interpretation in all six FAO languages or the attendance of experts on the relevant topics.
- [3] To address the concerns raised in the paper, CPM-18 *requested* that the SC explore mechanisms to address technical issues that are raised about draft ISPMs submitted for adoption but that are not objections.¹

Issue

- [4] As a result, the SC considered a discussion paper presented at its May 2024 meeting. This proposal included a new stage to the Standard Setting Procedure, allowing CPs to propose technical improvements or drafting adjustments to draft ISPMs for adoption. This discussion led to the creation of a SC small working group of SC members tasked with the development of a paper with a possible way forward for consideration of the SC at its meeting in November 2024.
- [5] Although the SC noted that the proposed mechanism would give more opportunity for technical improvements of draft ISPMs being presented for adoption, there were some challenges limiting its acceptance and implementation.
- [6] As explained by the secretariat, the proposed time frame would not be feasible to implement because of the deadlines for posting CPM papers and the time required for translation. However, the SC agreed to add a footnote to the SC November report to highlight the fact that draft ISPMs approved by the SC for adoption by the CPM are available in English, with the publication of the SC report, as appendices. This

¹ CPM-18 (2024), agenda item 10, decision point 5:
https://assets.ippc.int/static/media/files/publication/en/2024/05/CPM-18_Report_2024-05-15.pdf

would be in January at the earliest, given the time required to finalize the SC report and complete editing of the revised draft ISPMs.

- [7] Another aspect considered was the potentially large number of these types of comments and the setting of a limit. Setting a limit was not considered feasible, as the current process does not restrict the number of objections CPs can submit. Furthermore, the mechanism for addressing these comments would potentially demand holding meetings that could not be organized before or during the CPM.

Possible options forward

- [8] After consideration of the proposal, the SC recognized that the current Standard Setting Procedure for objections already accommodates a means to submit proposed improvements aimed at optimizing the text and its technical content before adoption by the CPM ([IPPC Procedure Manual for Standard Setting](#), part 3.5.1). However, there is a need to better communicate the process and perhaps adjust the [objection templates](#) to better indicate the way objections can be dealt with. There is precedent for a draft ISPM being adopted when an objection was submitted with a technical solution and that solution was accepted by the CPM.
- [9] As in the current process, any objection submitted by CPs (or group of CPs, perhaps coordinated by their regional plant protection organization (RPPO)) would have to clearly articulate the rationale for the suggested improvement, articulate how it improves the text of the draft ISPM and be posted as required on the International Phytosanitary Portal.
- [10] In conclusion, to address the request of CPM-18 (2024), the SC considers that the current process is adequate and the secretariat has confirmed the possibility of raising awareness among CPs and RPPOs, highlighting the availability of the draft ISPMs attached as appendices to the SC November report and the flexibility already available in the current objection procedure for submitting improvements to ISPMs proposed for adoption.