

## **Statements from COSAVE countries on several CPM-19 agenda items**

### ***Agenda Item 8. Report from the Strategic Planning Group. Is it time to rethink ISPMs? (CPM 2025/47)***

COSAVE and its member countries thank New Zealand and SPG for the development of this document and provide the following comments.

**Low readability:** We agree that standards should be written in a language easy to read and easy to follow (plain language), because plain language may facilitate their understanding. We acknowledge that some ISPMs have long repetitive sentences filled with unnecessary words. However, the use of specialized phytosanitary terms is necessary in ISPMs and the quality of technical language in ISPMs should not be affected by excessive simplification. Language in ISPMs should be as easy to read as possible, but as specialized as necessary.

**Low translatability:** We agree that the low translatability of the ISPMs might lead to some CPs investing in interpretation services to help translate and use the ISPMs. But this will continue to be the case even when the ISPMs are written in plain language.

**Core requirements are unclear:** the document is based on the analysis of ISPM 11 where the indication is that ISPM 11 has almost twice as much guidance than requirements. This is based on how the terms “should” and “may” are used in the ISPM. This is not always so in all adopted ISPMs. In addition any modification made would involve a thorough review of the use of should and may in all ISPMs, a task that has already been discussed in the past by CPM and has not been carried out for various reasons.

### **Options for resolving issues**

**Plain language:** Among the options suggested for developing and revising ISPMs in plain language we agree with:

- inserting explicit plain language principles into the IPPC style guide;
- including a core task for expert working groups and technical panels to:
  - develop ISPMs using plain language principles;
  - test text using the Flesch-Kincaid readability test with the aim of text having a reading ease score of 50 or greater;

However, the Flesch-Kincaid readability test is suitable for English language, but when using Fernandez-Huerta readability test for Spanish language, the same ISPM II text resulted in an easy to read score. Therefore scores could vary between languages and the tool used.

We do not agree in establishing a Technical Panel on Plain Language to revise all adopted ISPMs into plain language over time. This revision would be in a very long term, would imply to send some of the adopted ISPMs to country consultation, and would require resources that could be used for other urgent issues. Moreover, the revision of all adopted ISPMs will result in additional costs to translate ISPMs into all the FAO languages.

We agree with the approach that expert working groups focus on establishing core requirements and could develop guidance information in parallel. This approach would avoid the current delays in providing implementation resources, and would promote efficiency and reduce costs.

Regarding the next steps proposed by SPG we agree with:

- The Secretariat updates the IPPC style guide to explicitly include plain language principles;
- The Secretariat contracts a standards design specialist to provide advice on ISPM format, including digital and visual tools, to promote ease of use and understanding;
- The SC recommends to the CPM-20 (2026) a revised standard setting procedure for developing, consulting and publishing ISPMs in parallel with associated guidance;
- implementing the procedure once approved, starting from 2026 for setting new ISPMs or new revisions of ISPMs.



### **Agenda item 9.3. Proposed changes of the submission forms and the criteria for the justification and prioritization of proposed topics (CPM 2025/13)**

COSAVE and its member countries thank the Task Force on Topics and the IPPC Secretariat for the revision of the forms. We agree with proposed changes to sections 2 to 4 of Annex 1 to document CPM 2025/13. Regarding section 1 on “General Information” we suggest adding text to explicitly clarify that “subjects” (technical panels) do not require submission of a draft specification. The proposal is underlined below.

#### **1. *General information***


**Important information for filling out and submitting the form:**

**The YYYY Call for Topics closes 15 September YYYY.**

Please read through the Call for Topics web page, where additional guidance preparing topic submissions is available: <https://www.ippc.int/en/activities/standards-and-implementation/call-for-topics-standards-andimplementation/>.

The use of the new electronic submission forms is strongly encouraged. The electronic version of this form is available here: <https://forms.office.com/e/9JAeegjr0Z>

Diagnostic protocols are submitted using a different form available <https://forms.office.com/e/pp9bS2fJgX>

**Submissions must address the criteria for justification (see 5) and must include a draft specification (see 3.1) for proposed standards (except “subjects” on technical panels) or a draft outline (see 3.2) for proposed implementation resources. These are required for evaluation and subsequent development of the material. Including a literature review providing technical information is recommended.**

The completed submission form AND draft specification/draft outline may be submitted as Word documents by the IPPC official contact point, via email, to the IPPC Secretariat ([ippc@fao.org](mailto:ippc@fao.org)) no later than 15 September YYYY (Subject line: “Call for topics YYYYXXXX”).

Regarding section 5 concerning the criteria for the justification and prioritization of the proposed topics, we also suggest some modifications to clarify these criteria. The feasibility of implementation is not a criterion to be considered for the preparation of implementation materials. Therefore we would like to suggest the following changes:

**5. Criteria for justification and prioritization of proposed topics**

**5.1 Core criteria (Information must be provided by the submitter. It is expected that all submissions meet the following core criteria.)**

<b>Core Criteria</b>
1. ....
<b>2. Contribution to the purpose <u>or implementation</u> of the IPPC <u>or implementation</u> as described in article 1.1.</b>

3. 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).

Mandatory for standards

Optional for Implementation materials (optional)

4. ....

### **Agenda item 11.2 Proposed modifications to the procedure for the adoption of CPM recommendations**

COSAVE and its member countries agree with the proposed process for developing and adopting CPM Recommendations. According to paragraph 4 of document CPM 2025/18 the Bureau or the CPM may in any annual cycle determine that a further consultation period is required depending on responses received during initial consultations. The proposal is not clear about the timing during the annual cycle this further consultation would take place. Therefore, we suggest the following minor amendment in number 10 of paragraph 5, as underlined below:

*(10) If the draft CPM Recommendation is not adopted and needs further review or revision, the CPM may decide to send it to an appropriate CPM body or group, or the original proponent, for further revision, or to a second round of consultation. The revised CPM Recommendation would then be sent to the next CPM for consideration and adoption.*

### **Agenda item 13.1. Report of the Focus Group on Safe provision of food and other humanitarian aid (CPM 2025/30\_01)**

If the CPM determines to proceed with the development of an ISPM, COSAVE member countries suggest to modify tasks 2, 5 and 7 of the draft specification presented for adoption as follows:

#### **Tasks**

*(2) Identify the ~~categories of~~ regulated articles (e.g. bulk grain, shelter material, building materials, heavy equipment) frequently moved as humanitarian aid, including types of packaging.*

New task: categorize regulated articles identified in task (2) according to their pest risk (considering ISPM 32)

5) Develop a ~~standardized statement~~ additional declaration for use on phytosanitary certificates ~~to attest to the meeting of the phytosanitary requirements developed from tasks 2, 3 and 4~~

(7) Develop descriptions of the roles and responsibilities of NPPOs (of origin, transit and recipient countries) and humanitarian aid agencies with regard to minimization of pest risk along the disaster-relief pathway. ~~Align and coordinate these descriptions with the objectives of the World Organisation for Animal Health, the Codex Alimentarius Commission, the World Customs Organization, other United Nations agencies and other relevant conventions (e.g. Food Assistance Convention, Geneva Convention) that have a role in the safe provision of humanitarian aid.~~

New task: consider the guidelines from the World Organisation for Animal Health, the Codex Alimentarius Commission, the World Customs Organization, other United Nations agencies and other relevant conventions (e.g. Food Assistance Convention, Geneva Convention) that have a role in the safe provision of humanitarian aid.