

EU POSITION

AGENDA ITEM 8

IS IT TIME TO RETHINK ISPMs?

CPM 2025/27

The EU and its 27 Member States thank New Zealand for its paper (CPM 2025/47), which has prompted some considerable reflection within the EU on how we perceive ISPMs.

There is no denying that the impact of ISPMs would be optimised if properly implemented by all the contracting parties.

We are in favour of considering accessibility within the IPPC community, in a common understanding of the concept that focuses primarily on enabling access for people with disabilities, or enabling access through the use of assistive technology (see the Web Content Accessibility Guidelines - WCAG), and which benefits everyone. However, we would like all elements of accessibility to be carefully considered and a way forward to be discussed and agreed upon for each one of them: plain language, headings, layout, tables, lists, images and hyperlinks.

We also believe that improving the readability and translatability of ISPMs through the use of plain language as well as visual and digital tools may translate into an improved impact for many contracting parties and help achieve the objectives of the IPPC. We are therefore willing to further explore the options and tools necessary to achieve that improvement and take a decision on how to proceed at a later stage.

However, the EU and its Member States do not agree with the proposal to redraft all existing ISPMs in plain language, or to revise the standard-setting procedure for the development, consultation and publication of redrafted ISPMs in parallel with the associated guidance. This is partly because revising all existing standards would constitute a tremendous and lengthy task for the secretariat, the SC and the IC, as well as the contracting parties, involving a huge financial burden, which may not be necessary. In addition, there is already an established procedure allowing contracting parties to request the revision of standards in the event of any issues arising.

Furthermore, we would like to highlight the fact that all existing ISPMs have gone through an agreed IPPC standard-setting process and two rounds of country consultations to ensure that each of them is adapted as far as possible to the needs of the contracting parties. ISPMs are developed through an inclusive and transparent process, whereby agreement on every word or sentence is crucial. Simplifying existing standards may lead to the loss of key elements and prevent agreement on their adoption.

We would recommend applying an agreed approach for improving the readability of ISPMs when developing a new ISPM, as a pilot measure.

Testing the new approach with the PRA ISPM is viewed with caution by the EU. Given PRA's complexity, and bearing in mind that it is one of the most technical standards, targeted mainly at highly specialised personnel, any revised ISPM on this topic must maintain an adequate level of guidance. In addition to that, and with reference to the related specification 76 task 6, asking the EWG to consider standards for PRA developed by sister organisations and identifying elements that could be applied where appropriate to improve the draft standard, the EU considers that this is an issue that should be considered within the scope of the broader discussion on ISPMs, and should not be one of the tasks allocated to the EWG as it would only add an enormous workload to the EWG and distract it from the main scope of its work.

Any approach aiming to improve the readability of ISPMs should not alter their technical content as adopted by CPM.

Another important consideration concerns the choice as to which elements/material (requirements and guidelines) to retain in the core text of a standard, which to retain in its annexes and appendices and which to retain in the implementation material.

The broad scope of topics considered under the IPPC is reflected in the variability of its standards. The focus should be on developing standards that are clear, well understood by the CPs and easy to implement, not on harmonising the structure with those of sister organisations, which may lead to the loss of the specificity of each ISPM.

In conclusion, as the development of ISPMs is the IPPC's core activity, the EU and its Member States consider that – this being the first time the proposal by New Zealand is discussed at CPM – it is still too early to ask the Bureau and the SC to explore the issue and to develop a detailed implementation plan to be presented at CPM-20 (2026). We believe that, due to the importance of the subject, it is necessary for the IPPC community to invest sufficient time in identifying, discussing and exploring the issues associated with ISPMs and take the most informed decisions in a consensual manner. Furthermore, with reference to decision point 29 of the report of the CPM Bureau meeting of 10, 12 and 17 December 2024, the bureau agreed that the paper will be submitted as an INF document at CPM-19, with one hour allocated for an informal discussion.

We therefore suggest that the proposal should be further discussed at the SPG meeting in 2025, and that the next steps be redefined.

The EU and its Member States do in fact consider that discussions on this topic could very well feed into decisions for the next strategic framework.

Finally, we consider that, in order to ensure a good basis for further exploration, it is important for each CP and/or RPPO to identify the challenges they face with regard to implementing ISPMs, and to map the specific ISPMs with those challenges.