

EU POSITION

AGENDA ITEM 12.2

STRATEGIC FRAMEWORK DEVELOPMENT AGENDA ITEM COMMODITY-SPECIFIC ISPMs

(CPM 2025/22)

The EU and its 27 Member States thank the IPPC TPCS for the progress made on the development of commodity-specific ISPMs and for the report, which we note.

We would however like to underline the following points:

1. With respect to the proposed tentative timeline, ISPMs for priority 2 commodities (*Vitis vinifera*, *Malus domestica* and *Citrus sinensis*) are expected to be adopted at same time as ISPMs for priority 1 commodities (Citrus fruits and seeds of *Phaseolus vulgaris*), raising questions on the priorities assigned to the different subjects. However, the priorities for the subjects for commodity-specific standards endorsed by CPM should not be altered by TPCS and should be reflected in the timing for development and adoption of the standards. In addition, in the report, there is no mention of criteria used by TPCS to determine the order of the subjects to be developed.
2. From the experience of the first Annex on mango fruit, we would like to highlight the need to:
 - a. clarify whether supporting documents can be submitted also after the deadline set by the call and during the first consultation, either spontaneously or at request of the TPCS;
 - b. specify procedure and timing to update approved Annexes.
 - c. make all supporting documents available for consultation for contracting parties to verify the consistency with the cited references.
3. Finally, we would like to draw attention to an issue related to the drafting process of these annexes that has perhaps not been sufficiently highlighted. In accordance with ISPM 46, pests regulated by at least one contracting party based on technical justification are included in the list of pests of the Annex. TPCS experts are not called upon to assess the technical justifications for regulated pests submitted by contracting parties to support their inclusion

in the Annex. A consequence of this is that certain pests for which there is scientific evidence supporting that the commodity is not a pathway would be retained in the standard. Without a proper understanding of this approach, these Annexes could be misinterpreted.

It should further be emphasised that since no assessments of the technical justification of regulated pests and measures currently used in trade are made by the TPCS, the competence of the experts is exclusively required to assess the completeness of the information in the supporting documents.