Commission on Phytosanitary Measures

STRATEGIC PLANNING GROUP

DISCuSSION PAPER

rethinking ISPMs, concept planning and steps forward

(*Prepared by Greece*)

1. Background

At the CPM Strategic Planning Group (SPG) meeting in 2024, New Zealand motivated by the concerns raised during the 2023 regional consultation on the reorganized pest risk analysis (PRA) standards, presented a discussion paper on “Rethinking ISPMs” highlighting issues concerning the readability accessibility and clarity of ISPMs and an assessment on the possible impact on their implementation.

This paper became the basis of fruitful and extensive discussions that continued in CPM 19 and were further elaborated in a dedicated Friends of the chair meeting. CPM 19 considered that improving the clarity and utility of ISPMs will be a core part of the 2025 SPG meeting agenda and invited Contracting Parties (CPs) to provide papers on viewpoints for consideration to the SPG.

2. Discussion

2.1 Introduction

In follow up of the discussions that started during last year’s SPG meeting about rethinking ISPMs and views exchanged during CMP 19, EU would like to provide a synopsis of our views on the need to improve the ISPMs and the way forward.

Preliminary discussions already highlighted a convergence of views on improving ISPMs readability and accessibility on the condition that simplification must not affect phytosanitary terms and the technical nature of their content.

At the same time proposals concerning the timing and changes in the content of ISPMs we believe needs to be more deeply discussed and debated within the IPPC community. Rethinking the content of ISPMs is a discussion to be held on the principles of long term strategic planning, that takes into consideration possible implications and consequences of any change. The development of ISPM’s is a complex and time consuming process that entails collaboration, consensus, and technical knowledge, with their implementation impacting trade under the framework of WTO-SPS agreement and IPPC convention. Therefore, it is important that the actual needs of the IPPC community are carefully identified and changes don’t undermine the status and important role of ISPMs in trade.

The implementation of ISPMs lies with the NPPOs of contracting parties and the IPPC -IC produces implementation material to articulate and explain their context and address technical issues that may arise during their implementation. It is true that the development of guidance material associated with ISPMs doesn’t follow the timeline of their adoption as this process is dependent on the availability of funds. This maybe contributing to the difficulties some contracting parties have in the understanding and implementation of ISPMs.

The need to remove guidance material from ISPMs was put forward as a way to improve their clarity and implementation but not all CPs have identified this need. There are also differences in the way we understand the term guidance and when it is needed in an ISPM. If we focus on “conceptual” ISPMs there are cases (like in the case of the overarching PRA Standard) where specific guidance is fundamental to ensure understanding and compliance with the core requirements and obligations and therefore should not be removed whereas in other cases (i.e. ISPM26) it may be possible to easily remove technical guidance to implementation material. Overall, the inclusion of guidance material within an ISPM (if needed) is an important element to help understanding and should be retained unless it is technical information or methodology on implementation.

The lack of a sustainable funding mechanism to align the development of guidance material with the adoption of ISPMs also raises the question how guidance material that is now embedded in ISPMs, can be removed and developed into implementation guides. Equally consideration needs to be given to how such guidance can be translated into all FAO languages. This is a core issue directly linked with the concept of rethinking ISPMs and should be discussed by the IPPC community before any decision on removing guidance material from ISPMs is taken on board.

Concluding, we consider and would like to discuss the following steps as a way forward to improve ISPMs:

* Start working on the improvement of the readability and accessibility of ISPMs to enhance understanding within the IPPC community. This is a worthwhile pursuit from which we can all benefit.
* Work further to identify the actual needs of the IPPC community by initiating a Survey as a first step.
* Continue the discussions on the revision of the Standards in the form of a Development Agenda Item for the next Strategic Framework. We envisage that a dedicated “global” DAI on this topic will give the IPPC community appropriate time and the forum to (1) Seek consensus on conceptual issues, (2) Identify future implications of suggested changes, and (3) Create an appropriate mechanism to align development of guidance material and ISPMs.

2.2 Focused work and possible steps forward to improve the readability and accessibility of ISPMs

 Adoption of simple concepts like avoiding long sentences and paragraphs and using shorter sentences and breaking up long paragraphs are practical measures that do make for easier reading.

Hyperlinks can be helpful but their overuse can disrupt the flow of reading, so they should only be used when relevant. Readability tests are useful indicators but the technical nature and significant audience must always be taken into account when using them.

Translatability issues exist but discussions should not be focused on these. EU’s experience in cultural and linguistic diversity (24 Official Languages) suggests, that it is impossible to diminish them, and are to be addressed in a case by case basis. In the phytosanitary context, for FAO official languages this is done during consultation process in other cases it is a burden undertaken by the NPPO of the contracting Party.

 Practical measures such as more active role for scientific report writers in the drafting and redrafting process could help simplify and improve overall readability of the text. This practical measure could be discussed and introduced into the standard setting process and may be applicable particularly on the drafting stage.

Additionally, and to help the user gain a better overview of the content of a Standard in a friendly manner, a preamble or explanatory synopsis section in plain language could be explored.

It would also be worthwhile to explore training or information sharing even before Regional Workshops, in the form of a webinar with the objective to explain draft ISPMs under consultation facilitate engagement understanding and getting better feedback

**3. Conclusion and next steps:**

ISPMs are core for the implementation of the IPPC convention under the framework of WTO-SPS agreement. It is important that ISPMs maintain their role and status in the IPPC community. It is equally important that ISPMs are understood and implemented by the whole IPPC community and any change aiming to their improvement reflects the actual needs of the Contracting Parties and considers possible impacts.

The SPG is the forum to exchange ideas and shape proposals on the concept and future developments for the IPPC and its work.

The CPM Bureau and SPG are invited to:

1. *Agree* that work on the readability and accessibility of the ISPMs can be initiated as there is consensus of views on this issue. Consider adapting simple practices and engaging a scientific editor to contribute on the drafting stage.
2. *Agree* that
* the needs of the CPs must be clearly identified and
* consensus on conceptual issues must be reached before any further action to improve the content of ISPMs takes place.
1. *Discuss* the idea of an IPPC (Observatory) survey as a first step to better clarify the issues
2. *Consider* that a dedicated “global” DAI on this topic is included in the next Strategic Framework to give the IPPC community appropriate time and the forum to 1. Seek consensus on conceptual issues 2. Identify future implications on suggested changes 3. Create an appropriate mechanism to align development of guidance material and ISPMs.