Commission on Phytosanitary Measures

STRATEGIC PLANNING GROUP

DISCuSSION PAPER

rethinking ISPMs – priorities and next steps

(*Prepared by the United States*)

1. Background

At the CPM Strategic Planning Group (SPG) meeting in October 2024, New Zealand discussed issues with the current International Standards for Phytosanitary Measures (ISPMs) including low readability and translatability and the impact that these issues have on implementation. Following a robust discussion, the paper was updated and shared with the contracting parties at CPM-19 (2025). Several options were proposed for resolving some of the issues, including the use of plain language, visual and digital tools, layering information, developing ISPMs with core requirements only, and learning from other standard setting organizations.

2. Discussion

When all contracting parties share a common understanding of ISPMs, the IPPC’s global objectives are advanced more effectively and efficiently. Clearer ISPMs and associated guidance makes it easier for countries to align national regulations with international standards, and it makes them accessible to all contracting parties regardless of their primary language or level of expertise. We received feedback from risk analysts, exports field staff, technical directors, permit specialists, and others about the challenges with interpreting ISPMs and the associated frustration with their lack of clarity. We consolidated the feedback received and prioritized potential actions to help define a path forward.

***ISPMs with Core Requirements Only***

The wording surrounding what is a requirement and what is guidance (“should” vs “shall” vs “must” vs “may” vs “can”) is likely confusing to many contracting parties because it is unclear what in the ISPMs is a legal requirement. This problem may be amplified in other languages that do not have this type of language distinction. Therefore, we believe that ISPMs need to be clearer on what the core requirements are and separate them from other information. This would allow the ISPMs to meet legal obligations and use more complex legal and technical language, but only for language that is required. Guidance can and should be more accessible in terms of plain language, reading level, graphics and examples.

***Plain Language and Visual/ Digital Tools***

Plain language and visual tools increase the accessibility of information. The style and layout of some of the IPPC’s guidance documents vs the ISPMs illustrates this idea (e.g. [Phytosanitary issues of consignments in transit: A guide for national plant protection organizations](https://openknowledge.fao.org/server/api/core/bitstreams/59f34196-d013-417e-b3b9-d344438ff725/content) vs [ISPM 25: Consignments in transit](https://www.ippc.int/static/media/files/publication/en/2016/01/ISPM_25_2006_En_2015-12-22_PostCPM10_InkAmReformatted.pdf)). Simple adjustments in the style and layout make information easier to understand in all languages, including non-FAO languages, even if the equivalency of terms remains an issue.

Focusing on the core requirements in ISPMs combined with the use of plain language wherever possible will make it easier to translate ISPMs. This is particularly important for countries that use artificial intelligence tools for translations. However, as noted above, plain language should not be used in place of necessary technical and legal language to avoid generating ambiguity.

Incorporating digital tools into ISPMs would be helpful, but this idea only works if the document is read on a computer. If documents are printed, digital tools (e.g. mouseover definitions) would not be accessible. Therefore, it will be important to make sure that each ISPM can stand on its own even if digital tools are embedded into a document.

***Examples of ISPM Implementation (Separate from Requirements)***

ISPMs should be shorter and focus on requirements, and implementation examples should be in the longer manuals or guidance documents. However, if contracting parties agree to pursue rewriting ISPMs, manuals and guides for these ISPMs should be in place before the rewriting process begins. In addition, ISPMs and guidance documents need to be better connected. For example, a specific ISPM can be found by going to the IPPC site > Standards > Adopted Standards and looking for the ISPM in the list. ISPMs are referenced by the name and number. Guidance documents are referenced by going to the IPPC site > Standards > Guides and Training Materials. This is a list of resources, some of which relate to specific ISPMs; however, the specific ISPMs aren’t referenced on the page, and sometimes the title of the guidance does not align with the name of the relevant standard or the actual name of the guide (e.g. the previously mentioned guidance on transit is simply called Transit). This can make it difficult to find guidance even for speakers of official FAO languages. Developing something such as a landing page for each ISPM that links to any relevant guidance may be helpful. In addition, including glossaries, acronyms, etc. within guidance documents allows readers to reference that information without also having to access the IPPC glossary or the internet.

***Plain Language Specialists***

Due to the highly technical nature of ISPMs, in-kind contributions from plain language specialists within member countries may be more useful than bringing in outside plain language specialists. Targeting people who speak non-FAO languages to represent their region and participate in working/expert groups could accommodate language barriers during the development phase, which enables a more proactive approach to this challenge.

3. Recommendations

The SPG is invited to:

1. *Discuss* and *identify* actions that can be taken immediately to improve understanding of ISPMs.
2. *Support* the development of a new guidance document for the Standards Committee that improves accessibility of ISPMs.
3. *Discuss* how existing ISPMs can be improved over time.