Commission on Phytosanitary Measures

STRATEGIC PLANNING GROUP

RE-THINKING ISPMS - SOME OBSERVATIONS FROM THE UK

*(Prepared by the UK)*

1. What are we trying to achieve

There appears to be a misconception that the concept of re-thinking ISPMs is about ‘dumbing then down’, it is not clear why this has arisen but it may be due to the use of the word ‘simplification’. In this context ‘simplification’ is being used to express an ambition to make standards easier to read, and therefore implement, rather than reducing their technical or scientific basis or credibility.

Removing complex guidance material from ISPMs and instead focusing on obligations and the justification for them will improve the quality and value of the standards we adopt and use. It will however not be possible or desirable to remove all guidance from an ISPM, as sometimes some guidance will be needed to help support comprehension of the text.

There have been concerns expressed that rethinking ISPMs would put at risk the recognition of the IPPC’s standards under the WTO-SPS agreement. This is unlikely to be the case as the SPS agreement simply recognises the standards produced by the IPPC (and other two sisters), it makes no comment on their ‘quality’.

Increasing the readability of a draft ISPM and ensuring there is a clear focus on obligations should also make the process of country consultation easier and potentially reduce the number of comments global stewards are required to review.

2. What should we be reviewing

There also unfounded concern that it is being proposed to review all ISPMs at the same time. This is clearly neither practical or desirable. The process of re-thinking ISPMs needs to be staged and it is our view that this would best be achieved by focusing on both new drafts or revisions to existing ISPM, i.e. only those standards which are included on the workplan.

There will inevitably be variation in readability between ISPMs, i.e. some being more accessible than others, this means that there is unlikely to be a need for all ISPMs need to be re-worded

We subjected a small sample of ISPMs to three different readability tests, the outcome of this work is appended to this paper but in summary of the six ISPMs examined:

* ISPM 15 and ISPM 17 are the most readable, with higher Flesch Reading Ease and lower grade levels.
* ISPM 23 and ISPM 11 are the most complex, requiring college-level comprehension.
* ISPM 1 and ISPM 2 fall in the middle, leaning toward technical complexity.

ISPM 5 – Friend or Foe

Is it time to take a fresh look at ISPM 5? One of the biggest challenge we face when drafting ISPMs is the inability to use words which are defined in ISPM5 in their ‘normal’ or ‘common’ understanding. A good example is ‘field’, this has a very narrow definition in ISPM which prevents it from being used in the way most people would understand it:

* A simple phrase such as ‘surveying the surrounding fields’ could not be included in an ISPM with its commonly understood meaning due to the ISPM 5 definition of field.
* ‘Surveying the surrounding area’ would be an obvious alternative wording, however the ISPM 5 definition of ‘area’ makes this impossible.

Another example could be

* ‘should result in the refusal to issue a phytosanitary certificate’. The ISPM 5 definition of ‘refusal’ means such a statement could not be included in an ISPM.

ISPM 5 also includes

* Words which arguably do not need to be defined by the IPPC, such as habitat and secretary.
* Acronyms, e.g. RPPO and NPPO. Acronyms do not need to have a definition, although recognising that what they are acronyms of may need defining.
* Words which may no longer feature in ISPMs following a revision of the standard. ‘transience’ may be an example of this following the revision of ISPM 8

Having defined terminology is demonstrably vital when relying on international standards to harmonise activities but should this be to the detriment of being able to use plain language?

Several years ago the Standards Committee considered, but rejected, a proposal for terms to be in bold or underlined when being used to express their ISPM 5 definition. Such an approach would have allowed words and phrases to be used with their ‘ordinary’ understanding whilst also ensuring that ISPM 5 terms were used when appropriate. In the sprit of re-thinking ISPMs it may be timely to reconsider such an approach.

Another solution would be to have a smaller list of key defined terms, including those which are included in annex II of the convection, and include standard specific definitions in an ISPM when needed to help with drafting or comprehension.

Some proposals which could be considered

* Not having appendices in ISPMs
* Not having examples in parenthesises (e.g. something, another thing)
* As an interim measure, guidance removed from ISPMs could be saved as a pdf document and saved on the IPP with a link to the ISPM and vice versa
* Review how it was envisaged the SC and IC would work together to ensure that standards and supporting guidance material were developed together. One of the main barriers to this has been the lack of regular program budget available to the IC and a solution to this, as raised at SPG 2024[[1]](#footnote-1) would be to reduce the size of the standards committee to its previous size (15) and making the money saved available to the IC.

**Appendix 1: Readability scores for a sample of ISPMs**

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| **ISPM** | **Flesch Reading Ease** | **Flesch-Kincaid Grade Level** | **Gunning Fog Index** | **SMOG Index** | **Summary** |
| 1: Phytosanitary principles for the protection of plants …. in international trade | 30.5 difficult reading, typically suitable for university-level readers | 12.112th-grade reading level, i.e., late secondary school | 16.9 best understood by someone with college-level education | 14.1 college-level reading requirement. | The document is highly technical and formal, consistent with its purpose as an international regulatory standard. It’s best suited for professionals or academics familiar with phytosanitary or trade-related terminology. |
| 2: Framework for PRA | 39.3 fairly difficult reading, suitable for readers with higher education. | 11.9 12th-grade reading level, i.e., late secondary school. | 17.4 best understood by someone with college-level education. | 15.2 college-level reading requirement. | Like ISPM 1, this document is technical and formal, designed for professionals in plant health, trade, or regulatory roles. It uses complex sentence structures and specialized vocabulary, making it less accessible to general audiences. |
| 11: Pest risk analysis for quarantine pests | 30.4 difficult reading, suitable for readers with higher education. | 12.8college-level reading requirement. | 17.1 Best understood by someone with advanced education, typically postgraduate level. | 14.8college-level reading requirement. | ISPM 11 is a highly technical and complex document, reflecting its role in guiding detailed risk analysis procedures. It’s best suited for professionals in plant health, regulatory policy, or scientific research. |
| 15: Regulation of wood packaging material in international trade | 78.5fairly easy reading, suitable for a wide audience. | 6.87th-grade reading level, i.e., early secondary school. | 11.2best understood by someone with high school education. | 10.8high school-level reading requirement. | Compared to ISPM 1 and ISPM 2, ISPM 15 is significantly more readable, likely due to its practical and procedural focus rather than conceptual or policy-heavy content. It’s more accessible to a broader audience, including technical staff and inspectors. |
| 17: Pest Reporting | 66plain English, fairly easy to read for most adults | 7.57th–8th grade reading level, suitable for early secondary school. | 9.5best understood by someone with secondary education | 9.8 secondary school-level reading requirement. | ISPM 17 is moderately readable, more accessible than ISPM 1 and ISPM 2, but slightly more complex than ISPM 15. It balances technical detail with clarity, making it suitable for both professionals and informed stakeholders. |
| 23: Guidelines for inspection | 27.6very difficult reading, suitable for expert or professional audiences. | 13.5 college-level reading requirement. | 18.0best understood by someone with advanced education, typically postgraduate level. | 15.5college-level reading requirement. | ISPM 23 is one of the most complex ISPMs analyzed so far, likely due to its technical language, procedural detail, and regulatory terminology. It’s designed for professionals involved in plant health inspections and regulatory compliance. |

1. [06\_SPG\_2024\_Oct\_ISPMs\_and\_Guidance\_UK\_paper\_2024-10-10.docx](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fassets.ippc.int%2Fstatic%2Fmedia%2Ffiles%2Fpublication%2Fen%2F2024%2F10%2F06_SPG_2024_Oct_ISPMs_and_Guidance_UK_paper_2024-10-10.docx&wdOrigin=BROWSELINK) [↑](#footnote-ref-1)