Commission on Phytosanitary Measures

STRATEGIC PLANNING GROUP

RETHINKING ISPMS-VIEWS FROM THE EPPO REGION

*(Prepared by the EPPO Secretariat)*

1. Introduction

The European and Mediterranean Plant Protection Organisation (EPPO) carefully considers the ongoing international discussions regarding the future of International Standards for Phytosanitary Measures (ISPMs). There are diverse views from the region on what needs to be changed and how these changes should be made. There is a gap in the understanding of the issues faced by contracting parties in the EPPO region. We emphasise that efforts to improve clarity, ease understanding, or restructure and simplify ISPMs must be carefully considered to ensure we do not lose the technical depth and credibility that make these standards trusted worldwide. Therefore, it is essential to proceed prudently and with a clear understanding of the issues surrounding ISPMs.

2. Why This Matters for EPPO Member Countries

ISPMs are fundamental for the 52 countries that comprise EPPO. They serve as the cornerstone of national plant health legislation, facilitating international trade. Across EPPO countries, there is a general understanding that ISPMs are not intended to provide direct guidance for inspectors. Instead, they are internationally recognised, scientifically based standards that support national laws and regulations. Efforts to improve their readability, facilitate greater understanding, and make their implementation easier must ensure that structural changes preserve the core qualities of ISPMs, in order to maintain their recognition within the WTO framework.

3. Opinion of the Regional Workshop

During the recent Regional Workshop, extensive dialogue highlighted various perspectives on improving ISPMs. While there was some interest in making standards easier to read and implement, there was also a clear understanding that these standards are the result of many years of expert work and are the result of a very thorough adoption process.

During the workshop, experts from diverse regions contributed valuable insights:

* Many emphasized the importance of keeping ISPMs technical and scientifically rigorous, as they underpin national legislation and enjoy international recognition.
* Some participants acknowledged that complex language can hinder understanding but suggested that this could be addressed through targeted improvements and pilot projects rather than wholesale simplification.
* Concerns were raised about developing implementation guidance, resource implications, and the translation of supplementary materials, especially if these are separated from the core standards.
* Overall, there was broad consensus that any modifications should maintain the standards' credibility and scientific depth, not diminish it.

4. Caution Against Premature Momentum

However, proposals raised during last year's meeting of the Strategic Planning Group advocating for significant simplification and changes to improve readability seem to be gaining momentum without a thorough assessment of the potential impacts on technical integrity. Therefore, we stress the importance of proceeding prudently.

5. Recommendations

We advocate for making ISPMs clearer through targeted language improvements, such as more accessible summaries and straightforward introductions, without altering the core technical content.

EPPO Recommendations:

1. Produce a survey template to understand the use of ISMPs and the challenges faced with specific ISPMs. This could be a valuable starting point to understand the needs to be addressed.
2. Use more accessible summaries.

* Include straightforward introductions.
* Maintain the integrity of core technical content.

1. Pilot readability enhancements:

* Recommend revising ISPM 23 as a test case.
* Assess how revised language affects:
* Understanding of the standard.
* Practical application.
* Preservation of scientific and technical accuracy.

1. Develop implementation guidance in parallel:

* Create practical support materials alongside the standards.
* Ensure these materials are well-resourced and designed for broad adoption.

1. Ensure global accessibility:

* Systematically translate supplementary materials.

6. Key Messages for the SPG and CPM

We strongly support the continued development of robust, scientifically and technically credible ISPMs. While clarity and accessibility are of utmost importance, they must not come at the expense of the standards’ integrity. We urge the IPPC to proceed prudently, respecting expert contributions, maintaining scientific rigour, and ensuring that standards continue to serve their vital role in protecting plant health worldwide.