



**EXPLANATORY DOCUMENT
ON
INTERNATIONAL STANDARD FOR PHYTOSANITARY MEASURES
No. 17
(PEST REPORTING)**

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October 2005

Note: Explanatory documents for International Standards for Phytosanitary Measures (ISPMs) are produced as a result of a decision of the Interim Commission on Phytosanitary Measures in 2004 (reported on paragraph 111 of the report of ICPM-6). They are written to provide supporting information to the standard they refer to and cannot be taken as an official legal interpretation of the IPPC or its related documents, and are produced for public information purposes only. Each document is written by an expert, reviewed by at least two peers (usually from the Expert Working Group concerned), then reviewed by the Standards Committee and the IPPC Secretariat. However, the material presented in explanatory documents remains the opinion of the writer and cannot be interpreted as a decision of the ICPM/CPM. It is hoped that most standards will have one or more explanatory documents associated with them.

PURPOSE AND RELATIONSHIP WITH OTHER STANDARDS

Pest reporting is an obligation of IPPC contracting parties. All countries want to be informed of the appearance of new dangerous pests on the territory of their trading partners. However, there has been a general tendency for many years for countries to report too little, and too late. They have not had any strong incentive to report pest outbreaks on their territory, and indeed have been well aware that such reports may lead to new restrictions or prohibitions on their export trade of plants and plant products, or may necessitate costly eradication campaigns. A country may hesitate to make an immediate report on a pest outbreak that may quietly disappear. One incentive for reporting is reciprocity. Countries will report if they feel assured that they do this not in isolation, but can expect similar reports in return. There is thus a need for an international cooperative system, which will provide the information which countries need, increase the credibility of pest reports, help to build up international databases on pest distribution, and facilitate international campaigns against new pests.

The IPPC lays down that:

"The contracting parties shall cooperate with one another to the fullest practical extent in achieving the aims of the Convention, and shall in particular cooperate in the exchange of information on plant pests, particularly the reporting of the occurrence, outbreak or spread of pests that may be of immediate or potential danger, in accordance with such procedures as may be established by the Commission."

In this respect, the Commission has developed ISPM No. 17 on "Pest reporting", which depends on a clear understanding of the geographical distribution status of pests in countries (ISPM No. 8: *Determination of pest status in an area*) and on the consistent use of the terms and concepts of ISPM No. 5 (*Glossary of*

phytosanitary terms). It has also supported the development of the International Phytosanitary Portal (IPP) as a mechanism for pest reporting, with the aim of making it easy for contracting parties to make pest reports, through the internet, to some or all other contracting parties.

GENERAL FORM AND CONTENTS OF THE STANDARD

The standard is divided into 6 main sections, with 3 minor sections at the end. Section 1 sets out the IPPC provisions related to pest reporting. Section 2 explains the purpose of pest reporting. Section 3, on responsibilities, explains the systems which the NPPO should have in place to be able to make good pest reports. Section 4 examines the nature of the information which should be reported and to which countries it should be addressed. Section 5 considers the type of event which initiates a pest report. Section 6 provides guidelines on the content of pest reports, and on the media in which they are communicated.

SIGNIFICANT PROVISIONS OF THE STANDARD

Sections 1 and 2 are self-explanatory and require no special comment. This explanatory document accordingly concentrates on issues arising in Sections 3-6.

Where the information comes from and how it is validated

Section 3 basically emphasizes the need for an NPPO to put in place systems for general surveillance and specific surveys. These are needed also for other purposes, and form part of the general concept of what is needed in a competent NPPO, able to fulfil its country's contractual obligations. Pest information may come from the NPPO's own work, or from various public or private sources. It cannot be assumed that the persons who first find and identify new pests will generally be the staff of the NPPO, and the first reports of a pest in a country often appear in the specialist press (entomological journals, growers' magazines...). So it is important to monitor such publications and to maintain contacts with entomologists, plant pathologists, etc. to obtain information before publication if possible. Such reports may, however, be mistaken or misleading, and it is important that the NPPO should evaluate them, first for their validity, then for the possible associated danger (by PRA).

Immediate or potential danger

The reporting of immediate or potential danger is the key element of this standard. The IPPC obligation primarily addresses the direct interests of contracting parties. They should be informed of any pest event which is of immediate or potential danger to them. The reporting country needs criteria to establish which pest events fall in this category. In theory, it could publish reports of all pest events (on the grounds that it does not know what constitutes an immediate or potential danger to other countries). But such an approach has several problems: 1) it is very laborious; 2) it obscures the situation, since significant reports may be lost among unimportant ones; 3) it fails to address the spirit of the obligation, which is to identify immediate or potential danger. So the reporting country in fact has to select what it is most useful to report.

Section 4.1 of the Standard provides guidance on this selection. It considers first the case of pests which are of immediate or potential danger to the reporting country. Broadly, this corresponds to the list of regulated pests for that country. A pest which is not present in the country but is regulated by it is known to be "of potential danger" to it as a result of PRA. A regulated pest which has a limited distribution in a country presents an immediate and continuing danger to it. A new pest which has just been found in a country, and is not yet regulated, may by rapid PRA be determined to present an immediate danger and be subjected to emergency action. Any event concerning such a pest qualifies as of immediate or potential danger to the reporting country.

Do such events also present an immediate or potential danger to other countries? If the country itself considers that the pest event constitutes a danger, then this is a strong basis for the presumption that it constitutes at least a potential danger for other countries. If informed of it, they can undertake the necessary PRA to take account of it. Besides, the report of a regulated pest in a country constitutes a change in its pest status (ISPM No. 8: *Determination of pest status in an area*). It may call into question the continued technical justification of the phytosanitary measures required in exporting countries on account of that pest.

Surveillance in the reporting country may also reveal pest events which are not of immediate or potential danger to the country, the pests concerned not being regulated. As far as the country itself is concerned, such events do not lead to any phytosanitary action and reporting such events is of relatively minor importance. However, such events could be of immediate or potential danger to other countries, and the reporting country could, under the general cooperation provisions of Article VIII of the IPPC, send them a warning. But there are nearly 140 contracting parties of the IPPC (to date), and the reporting country can hardly examine the immediate or potential danger of each pest report, of minor importance for itself, to every other contracting party. The text of Section 4.1 supposes that it is realistic for a reporting country to take note of the regulated pests specified by its neighbours and by its trading partners, and to report potential danger in these cases. The reporting country also has the possibility, through the International Phytosanitary Portal (IPP), of making the report electronically to all countries (see *Reporting medium* below). In that case, the other countries have to consult the IPP and decide what is of immediate or potential danger to them.

In summary, Section 4.1 simplifies the selection of what to report by relating it closely to regulatory status. Events concerning pests regulated by the country should be reported to all contracting parties. Events concerning pests not regulated by the reporting country should be reported to countries which regulate those pests (unless there are no pathways to them). Immediate dangers should be reported to everyone.

Occurrence, outbreak and spread

The text of the Convention also limits the scope of pest reporting by referring specifically to the "occurrence, outbreak and spread" of pests. The most important and typical type of pest event to be reported is an "outbreak". This is defined as "A recently detected pest population, including an incursion, or a sudden significant increase of an established pest population in an area". Of the different types of outbreaks, an "incursion" is the most significant. This is defined as "An isolated population of a pest recently detected in an area, not known to be established, but expected to survive for the immediate future". It corresponds to an outbreak of a pest new for the reporting country, and likely to establish unless phytosanitary action is taken. Such a case is very likely to be of immediate or potential danger to other countries.

Not all outbreaks are necessarily dangerous. There are pest incidents which are so temporary, and so limited in space, that they do not merit reporting. The pest is "not expected to survive for the immediate future". These concepts are also addressed in ISPM No. 8 (*Determination of pest status in an area*), which distinguishes a pest status category "Transient: non-actionable" corresponding to the level where reporting is not needed ("The pest has only been detected as an individual occurrence or isolated population not expected to survive and no phytosanitary measures have been applied."). The other pest "transient" pest status categories are "Transient: actionable, under surveillance" and "Transient: actionable, under eradication". Both these categories are incursions, and reportable.

The word "outbreak" can also be used to refer to an unusually large development of a population which is normally present at a low level (for example, outbreaks of forest pests such as *Lymantria dispar* in the Old World). For other countries, the normal low populations may not be considered to present a danger (acceptable risk), but the unusually large populations are dangerous (unacceptable risk). So such outbreaks are reportable, even though the pest is already present in the reporting country.

"Spread" is also reportable. It is defined as the "expansion of the geographical distribution of a pest within an area". In the present case, the relevant area is the reporting country. Spread can happen either gradually, or by sudden jumps. If a pest which has been reported in California appears in North Carolina, then this sudden jump within the USA may constitute an immediate or potential danger to other countries. The danger is probably greater than local spread (say to Oregon), which may not imply any substantial change in risk to other countries. However, information is needed on the continuing spread from an initial outbreak (see *Follow-up reports* below).

Finally, "occurrence" means simply presence, without any connotation of a new event. "Occurrence" is generally already known, through the accumulation of geographical distribution information in the scientific literature. However, a pest which is already present in a country, and is not regulated, can become an immediate or potential danger to another country if that country decides to regulate it. The "event" is then the decision to regulate. If the pest is already well known to be present, there is no need to report it. If the pest is only found by surveillance after it has been regulated, and appears to be long established, then its

"occurrence" should be reported. If its presence appears to be new, then it is an "outbreak" and not an "occurrence". For example, it has several times happened in Europe that a pest is reported in one country, and a second country where it is absent takes measures on account of it. Other countries then discover that the pest is present on their territory and has possibly been so for many years. Then, they should report its "occurrence".

Follow-up reports

Though ISPM No. 17 concentrates on the initial pest report, it is clear that this should be followed up if necessary, so follow-up reports are also covered by the Standard. It is in a country's own interest to report that a pest is no longer found and, if and when the conditions of ISPM No. 9 (*Guidelines for pest eradication programmes*) have been satisfied, that the pest has been eradicated. The same applies to the report of a pest-free area (according to ISPM No. 4: *Requirements for the establishment of pest free areas*). However, the most significant follow-up situation, that the pest in fact becomes established and spreads, creating an even greater danger than the original outbreak, is often not reported at all. It is not so much in a country's interest, but clearly it should be done. One cannot necessarily rely on the appearance of other publications showing that this is happening.

Content and timing of reports

The Standard makes it optional to indicate the phytosanitary measures applied. However, it is clearly in the reporting country's interest to report the extent and significance of the measures applied, so this really a normal part of the report.

The question of the timing of reports is necessarily a compromise. Other countries naturally wish to receive pest reports as early as possible. However, there must be time for the report to be properly evaluated and verified (in particular, if special diagnostic tests are needed). False reports are in nobody's interest. In this author's opinion, the report should in principle not be delayed until the following growing season (a practice which is not unusual, and which allows outbreaks eradicated within the year to pass unreported!).

Reporting medium

At the time ISPM No. 17 was approved, the International Phytosanitary Portal or IPP (to which it refers) was only an unrealized project. The possibilities for countries from all parts of the world to use the internet for reporting were less developed than they are today. So it was necessary to take a relatively conservative position on the reporting medium, and retain the use of mail or fax. Nevertheless, it is part of the ICPM's general policy on information exchange to promote electronic communication, in view of its speed and reliability, and of the ease with which information can automatically be sent to many destinations. On the face of it, the internet is the ideal medium for communicating pest reports, and it can only become easier to use it in future.

Even in the few years since the approval of ISPM No. 17, many more NPPOs have internet access at a practical level. Besides, the IPP now exists. Workshops on its use are being organized through 2005, and it is in position to become the main practical medium for pest reporting from 2006 onwards. Implementation of ISPM No. 17 must now take account of this. It may also be noted that use of the IPP resolves to a certain extent the difficulty about the countries to which reports should be sent (Section 4). If publication on the IPP is in itself considered sufficient, then all countries have access to it in any case. If for some special reason, the reporting country wishes to address pest reports only to certain other countries, the IPP can also be used to do this.

The Standard specifies an alternative approach to the IPP, which is to publish pest reports on a national website. It is important in this case that the pest reports should be very clearly identifiable as such, and should not be hidden in some inaccessible corner of the site. Also, though the Standard cannot insist on the use of English, or even of one of the FAO languages, for pest reports, it is clear that the use of national websites which do not have an alternative English interface will also be an obstacle to transparency. For reports on the IPP, or reports mailed directly to official contact points, use of English or another FAO language is less critical, since the identity of the report and the danger which it communicates will in any case be clear.

Other reports

Since the IPPC Article VIII obligations on information exchange are open-ended, ISPM No. 17 was drafted to make it clear that countries are free to report whatever information they may consider useful, beyond the considerations of immediate or potential danger which are analysed above. They should not take the view that ISPM No. 17 in any way discourages them from more general reporting. However, it is also important to stress that the immediate or potential danger which is communicated by a pest report may be concealed if the report is mixed in with others which do not communicate such danger. Immediate or potential danger should be highlighted.

Countries which are members of RPPOs may also have obligations to make pest reports to those organizations, and certain RPPOs collect, compile and publish such information on paper or through their websites. These information systems complement those directly put in place in the framework of the IPPC. There is, however, no official channel for information reported to RPPOs to be passed on to the IPP. Accordingly, contracting parties are encouraged to report to both.

REFERENCES TO ADDITIONAL EXPLANATORY MATERIAL

As mentioned above, the IPP is in place and its use is being promoted for pest reporting. Users of ISPM No. 17 should consult this website and all the information it provides on how to use it for pest reporting.

CONCLUSION

In view of the different initiatives undertaken by the ICPM (standards on pest reporting, on pest status, development of the IPP), we can look forward to a situation, within a few years, where pest reporting becomes a relatively routine matter, undertaken by a great number of IPPC contracting parties, via the Internet. Follow-up reports will keep the situation up to date, and countries will be able to determine their phytosanitary measures on the basis of accurate, detailed and recent information on pests.

However, this ideal situation does also depend on how contracting parties react to pest reports. The ICPM has gone to considerable trouble to develop standards which make it clear that the situation of pests in countries is not just black and white presence or absence. Accurate information allows discrimination among pest status situations representing quite different levels of risk for other countries. These different levels of risk justify different levels of measures, commensurate with the risk. Acceptance of ISPM No. 1 (*Principles of plant quarantine in relation to international trade*) implies that countries will respect this approach of managed risk. If importing countries react with wildly disproportionate measures to the report of a localized outbreak in an area which does not even export, then exporting countries cannot reasonably be expected to join in the cooperative initiative of implementing ISPM No. 17, and no progress will have been made.