



Commenting on draft international standards and other IPPC documents

Fact sheet

July 2021

The IPPC and international standards

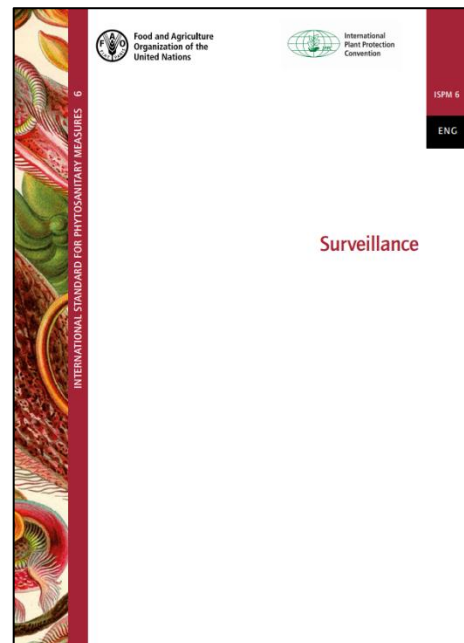
The International Plant Protection Convention (IPPC) is an intergovernmental treaty signed by 184 member countries (including Australia) with the purpose of protecting the world's plant resources from the introduction and spread of plant pests.

The IPPC develops International Standards for Phytosanitary Measures (ISPMs), recommendations, diagnostic protocols and phytosanitary treatments to harmonise facilitation of safe trade.

ISPMs are recognised as international benchmarks for trade in plant commodities and are the basis for phytosanitary measures applied during trade by the members of the World Trade Organization (WTO). Implementation of these standards is supported by IPPC documents and tools.

More information on the IPPC is available at <https://www.ippc.int/en/>.

The current ISPMs are available at <https://www.ippc.int/en/core-activities/standards-setting/ispms/>.



ISPM 6 (*Surveillance*)- sets out the requirements of pest surveillance used to form the basis of the internationally recognised pest status of an area.

What do you need to know?

1. This year, a number of new international standards have been drafted and existing standards have been revised.
2. The IPPC has released drafts of these documents to contracting parties and the public for global review and comment.
3. You have an opportunity to provide comment on these draft documents and influence their contents.
4. If you would like to contribute, please send your comments back to Australia's IPPC Contact Point at IPPC.contactpoint@awe.gov.au by 6 September 2021, for their consideration for inclusion in the one submission comprising Australia's comments.



Why provide comment?

Australia and our trading partners are required to comply with IPPC standards and other adopted documents.

Providing comment:

- Is a chance to become familiar with and influence the development of standards that may have an impact on your industry, and/or regulatory environment.
- Can help ensure adopted standards properly consider the implication to relevant industries and governments and ensure the finished product is able to be implemented as easily as possible.
- Equips Australian delegates with a greater ability to understand the various points of view and formulate an informed Australian position, noting the Australian Department of Agriculture, Water and the Environment is the agency that will present these positions and ultimately agree (or otherwise) to adopt the various standards.

Changes to these standards may impact the production or trading activities of your industry or regulatory environment

Example: ISPM 4 (*Requirements for the establishment of pest free areas*) was adopted in 1995. It is currently under review as global thinking, trade and biosecurity systems have matured and changed since its initial drafting. Changes made however, may impact current industry and state and territory government management of Pest Free Areas. This is why it is important for you to be aware of these standards, their development and review.

How to comment

When formulating your comments:


1. Consider:

- Technical robustness (is it based on science?)
- Is this the best process and/or practical to implement?
- Does the document make sense? Is the meaning of the text clear and the intent of the document achieved?
- Have important terms been appropriately defined?
- Have the terms '**should**' and '**may**' been used appropriately? Note: Countries will be expected to adhere to all '**shoulds**.' '**May**' indicates something that is optional.



2. Document your comments in **track changes**. Link each comment to a “comments box” similar to the one shown below and...
 - Include justification for each comment e.g. specify species here to maintain consistency with rest of the document.
 - Where changes to the text are requested, please provide suggested alternative text.
 - Provide references (e.g. journal articles) to support comment where applicable.

Comment template

	<p> Comment Provider Comment-template-to-link-to-each-of-your-proposed-changes.¶ ¶ <u>Comment:</u>-(Please-provide-General-Comments-here.-If-you-are-proposing-to-add,-delete-or-change-text,-please-do-this-in-tracked-changes.)¶ ¶ ¶ <u>Comment-Justification:</u>-(please-provide-your-explanation/justification-for-your-proposed-change)¶ ¶ ¶</p>
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3. Submit your comments to Australia’s IPPC Contact Point within the Australian Department of Agriculture, Water and the Environment at IPPC.contactpoint@awe.gov.au by 6 September 2021. Consideration will be given to all comments before determining whether to include them in Australia’s response.

Things to note

- Submitted comments will be made **publicly available** online.
- Comments should be polite and diplomatic in tone.
- Comments should be clear and able to be understood by someone without specific industry or technical knowledge.



The IPPC Commission on Phytosanitary Measures is the forum for adopting final ISPMs and other international protocols.