



# IGTC

International Grain Trade Coalition

Avenue Krieg 40  
Geneva CH-1208

**Second Consultation:  
Draft ISPM on Commodity-based standards for phytosanitary measures  
as posted on the IPPC website: [www.ippc.int/en/publications/90013/](http://www.ippc.int/en/publications/90013/)**

**The International Grain Trade Coalition (IGTC) respectfully submits the following response to the Second Consultation on the Draft ISPM Commodity-based standards for phytosanitary measures (2019-008).**

**IGTC prioritizes the International Plant Protection Convention (IPPC) as an important instrument to facilitate safe trade and underpin a global rules-based trading system through standard setting to the benefit of our sector. Over the period covering CPM 16-CPM 17 (2022-2023), we will be watching closely key grain trade milestones of the IPPC's work, most notably progress on:**

- 1. The draft ISPM on "Commodity-based standards for phytosanitary measures (2019-008)";**
- 2. ISPMs such as the newly approved ISPM-45 "Requirements for national plant protection organizations if authorizing entities to perform phytosanitary actions";**
- 3. IPPC 2020–2030 Strategic Framework that includes partnerships with the private sector;**
- 4. The ePhyto Solution;**
- 5. The Focus Groups on Communication and Climate Change Impacts on Plant Health.**

**IGTC sees the standard setting work led by National and Regional NPPOs, and the IPPC's Commission on Phytosanitary Measures (CPM) as crucial to our sector. We are committed to communicating and promoting the role of the IPPC as one of the "three sisters" along with Codex Alimentarius and the World Organization for Animal Health (OIE) that support the implementation of the World Trade Organization (WTO) Sanitary and Phytosanitary (SPS) Agreement via the creation of scientifically justified, globally harmonized international standards, guidelines and recommendations.**

**Requests for further information and proposals for joint work to face common priorities for IGTC and IPPC should be addressed to IGTC Secretariat Katy Lee ([secretariat@igtglobal.org](mailto:secretariat@igtglobal.org) +41 78932 96 18).**

**Submitted 30 September 2021**

Gary C. Martin  
IGTC President



---

### **About IGTC**

---

*IGTC is a federation of non-profit organizations formed to serve the greater good by promoting and facilitating the performance of the supply chain for grains, oilseeds, pulses and derived products. Aims include:*

- *Support accomplishments toward world food security and economic well-being goals as defined by the United Nations.*
- *Inform and promote the common/shared interests of international actors that include farmers, producers, exporters, importers, governments and consumers.*
- *Foster a safe, predictable, sustainable, affordable, nutritious and secure food supply across the world.*
- *Share critical research and expertise on the global supply chain.*
- *Serve the diverse needs arising from international provision of food, feed, transport and processing for grains, oilseeds, pulses and derived products in particular by:*
  - *Providing technical, legal and economic evaluations of certain current and future practices and policy on the impact on the distribution chain and food availability, security, affordability, and safety;*
  - *Communicating internationally and supporting regional, national and local communication.*

#### **Response to draft ISPM (2019-008)**

IGTC remains at the disposal of NPPOs, RPPOs and IPPC to provide grain trade expertise and experience, with understanding of the “practicality and feasibility” of measures as referenced in the draft text [paragraph 114] to support the establishment of the ISPM for commodity-based standards.

IGTC supports rules-based trade supported by international standard-setting bodies focused on science and risk-based, and technically justified approaches.

IGTC considers and supports the IPPC as an important instrument to facilitate safe trade and underpin a global rules-based trading system through standard setting to the benefit of the sector.

- **Scope [34, 35]**

The scope of the ISPM is relevant and supported from an IGTC perspective.

- **Technical justification [throughout the draft ISPM]**

Measures must be technically justified from a phytosanitary purpose. IGTC highlights for example that “quality” specifications are exclusively contractual issues and should not be included in the overarching commodity standard, nor in individual commodity ISPMs that follow.

In addition, Pest Risk Analysis (PRA), phytosanitary measures and alternative measures, import requirements, are all effectively implemented if based on technically justified approaches and scientific evidence.

Plant pest lists are an essential tool to facilitate safe trade. IGTC highlights, in line with the draft ISPM, that “lists of pests and options for phytosanitary measures are not intended



to be exhaustive and are subject to review and amendment. Lists are of potential pests only for action, and not to be included in a country legislation if not technically or scientifically justified”.

- **Principles in relation to commodity standards [61-67]**

IGTC supports the drafting of science-based and technically justified ISPMs that facilitate rules-based safe international trade. As per the WTO SPS Agreement it is important that the international standards provided by the IPPC “further the use of harmonized sanitary and phytosanitary measures between Members” and “without requiring Members to change their appropriate level of protection of human, animal or plant life or health”. With this in mind, IGTC supports the reference in the text to “sovereign rights” of contracting parties to set appropriate levels of protection for plant health, “assisting” them with decisions in this regard.

In addition, Commodity standards should be reviewed, updated, improved etc on a regular basis rather than be stagnant and potentially contain outdated processes, practices etc.

It is important to note that supporting documents as outlined in the IPPC’s Strategic Framework 2020-2030, such as diagnostic protocols and phytosanitary treatments, should not be taken as mandatory for NPPOs to implement, they are for guidance only.

- **Intended use of commodity [throughout the draft ISPM]**

IGTC welcomes the focus on “intended use” throughout the text and highlights the crucial importance of transparency of this among contracting parties. Safe trade benefits when all parties are aware of the intended use when a commodity standard is implemented. Importing countries have an important role in ensuring that appropriate practices are in place to confirm the commodity is used as per that notified intended use.