

10 February 2014

Ms Julia Rymer  
Assistant Director  
International Plant Health Program  
Department of Agriculture  
Canberra ACT

Dear Ms Rymer,

Re: Draft specification for ISPM - International movement of grain

I refer to the request from the Department of Agriculture for industry comment on the revised specification - International Movement of Grain.

### About Grain Trade Australia

Grain Trade Australia (GTA) is the focal point for the commercial grains industry within Australia. It facilitates trade and works to provide an efficient, equitable and open trading environment by providing leadership, advocacy and commercial services to the Australian grain value chain.

GTA members are responsible for over 95% of all grain storage and freight movements made each year in Australia. Over 95% of the grain contracts executed in Australia each year refer to GTA grain standards and/or trade rules.

GTA members are drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA members are involved in grain trading activities, grain storage, human and stock feed milling.

Within this context, GTA provides comment on the revised specification.

### Comments on the specification

The following comments relate primarily to placing a greater emphasis on importing country practices rather than a heavy reliance on the exporting country. This approach is self-evident given that Australia is a grain exporting nation.

GTA believes that with the inclusion of these amendments, the draft specification will provide a base to develop a standard that would suit the needs of both exporting and importing countries.

Para no	Sentence/row/indent etc	Type of comment - substantive, edit, technical	Proposed rewording	Explanation of comment
7	Row 11	Technical	Phytosanitary measures applied before export, during transfer, on arrival, and during handling and processing <u>in the importing country</u> can be effective in pest risk mitigation and thereby help to improve food security and the conservation and sustainable use of biodiversity, but international guidance is needed to ensure such measures are technically justified, commensurate with the level of risk, and not more trade-restrictive than required.	Clarify that handling and processing relates to the importing country only, as measures "applied before export" apply in the exporting country.

Para no	Sentence/row/indent etc	Type of comment - substantive, edit, technical	Proposed rewording	Explanation of comment
11	Row 4	Technical	The standard should identify and describe specific phytosanitary measures that could be used to reduce pest risk prior to export, during transfer, on arrival, and during handling and processing <u>in the importing country</u> .	As above, clarify that handling and processing relates to the importing country only, as measures “applied before export” apply in the exporting country.
14	Row 4	Technical	The number and types of pests that have been <u>or may be</u> introduced via the grain trade and which may be of quarantine concern should be considered.	When providing guidelines, all quarantine pests should be considered, being those already cosmopolitan and those not currently found in a particular importing country.
21	Part i	Technical	i. secure storage, processing, packaging or confinement of grain <u>before, during shipping and post-shipment</u> during transfer	To reflect that these pest risk mitigation measures may be applicable to be applied at various stages along the grain supply pathway.
21	Part iii	Technical	iii. situations at and after import such as <u>the method of unloading, storage and transport or</u> processing of grain at destination (e.g. milling, oilseed crushing, malting, biofuel production, pelleting, or cleaning and packaging/repackaging for retail sale)	To emphasise that the method of discharging, storage and transport of a grain consignment in the importing country may have a significant impact on the prevention of cosmopolitan pests contaminating the grain consignment.

### Comments on the Standard drafting process – Para 32 Expertise

1. There is a reference that 8 to 10 phytosanitary experts be appointed along with a loose invite of “2 to 3 industry experts as required”. This is a positive development but needs to be tempered that the additional expertise needs to reflect the different industry practices in all the various jurisdictions, be they importing or exporting countries. NPPO’s in all countries have developed, over time, processes that suit the needs of their stakeholders, thus work practices between countries will be substantially different.
2. Simply allowing “submissions from interested parties” is not sufficient unless properly co-ordinated to get the right mix of input. Thus the invited industry experts must liaise with the many different grain industries in major exporting/importing countries.
3. GTA as member of the International Grain Trade Coalition (IGTC) will liaise with our global counterparties to ensure that each country/industry sector as appropriate can provide suitable input for consideration by the invited industry experts prior to their attendance.
4. If agreed, by the IPPC Standards Committee, GTA would strongly recommend that the IGTC be consulted in regards to the selection of those experts (previous point) as the last thing we would want is for those invited industry experts to not represent the current views of the major grain exporting nations.

Thank you for consideration of this response.



Geoff Honey  
Chief Executive Officer



[1] **2008-007: Draft specification for ISPM - International movement of grain**

[2]

This is not an official part of the specification and it will be modified by the IPPC Secretariat after approval.	
<b>Date of this document</b>	2013-11-22
<b>Document category</b>	Draft specification for an ISPM
<b>Current document stage</b>	2013 SC November approved for member consultation
<b>Major stages</b>	<p>2008-03 CPM-5 added topic International movement of grain (2008-007)</p> <p>2011-12 Open-ended workshop to collect, consider and discuss information on phytosanitary issues related to the international movement of grain</p> <p>2012-04 SC reviewed draft and approved for MC</p> <p>2012-09 Steward reviewed countries' comments and redrafted text</p> <p>2012-09 Secretariat edited draft</p> <p>2012-11 SC revised draft specification to reflect responses from member consultation and SC discussions. SC has not approved the draft specification.</p> <p>2013-03 CPM discussed topic and requested contracting parties to submit comments on strategic issues to the SC members from their region no later than 22 April 2013</p> <p>2013-11 SC reviewed draft</p>
<b>Steward history</b>	<p>2013-05 SC: Woode, Ruth (GH, Steward), Rossel, Bart (AU, Assistant Steward)</p> <p>2008-11 SC: Unger, Jens (Germany)</p>
<b>Notes</b>	2013-22 Edited

[3] **Title**

[4] International movement of grain.

[5] **Reason for the standard**

[6] International trade in grain to be used for human consumption, animal feed or further processing (e.g. milling, oilseed crushing, biofuel production) is important to the economies of both grain-exporting and grain-importing countries. A stable grain trade is critical for feeding the world's growing population and it plays a major role in global food security. Grain has been traded in large volumes for centuries and has been considered a commodity of inherently low risk as it is primarily infested by storage pests that are cosmopolitan. Presently, the international grain trade is well developed and highly globalized, and it uses sophisticated infrastructure. Phytosanitary measures applied to the international movement of grain help reduce the risk of introduction and spread of quarantine pests into new geographical areas. These measures should be technically justified and not more trade-restrictive than required.

[7] Although a number of general ISPMs (e.g. on pest risk analysis (PRA) and pest free areas (PFAs)) provide relevant guidance for the phytosanitary aspects of the international movement of grain, there is currently no adopted ISPM that focuses specifically on phytosanitary measures for the international movement of grain. This has resulted in a lack of harmonized approaches for managing pest risks associated with grain. Many national organizations and trading partners have developed guidelines and quality specifications, including grade standards, applicable to the international movement of grain. While many of these address only grain quality and/or food safety some may have significant effect on mitigating pest risk. It is important that national plant protection organizations (NPPOs) focus on phytosanitary measures applied to prevent the introduction of quarantine pests. Grain exporting and importing countries may benefit from guidance on the assessment of pest risks related to grain as a pathway for quarantine pests and on technically justified phytosanitary measures to manage such pest risks. Phytosanitary measures applied before export, during transfer, on arrival, and during handling and processing in the importing country can be effective in pest risk mitigation and thereby help to improve food security and the conservation and sustainable use of biodiversity, but international guidance is needed to ensure such measures are technically justified, commensurate with the level of risk, and not more trade-restrictive than required.

[8] **Purpose**

[9] The standard may facilitate the safe international movement and trade of grain through harmonized guidance and criteria for the establishment of phytosanitary import requirements to be used by NPPOs. The application of this standard may help minimize the global spread of pests due to the movement of grain.

[10] **Scope**

[11] The standard should apply to consignments of cereals, oilseeds and pulses intended for processing or consumption (hereinafter "grain") moved internationally and provide more specific guidance than other ISPMs provide (in particular ISPM 11:2013) to assist NPPOs to identify, assess and manage the pest risks associated with the international movement of grain. The standard should identify and describe specific phytosanitary measures that could be used to reduce pest risk prior to export, during transfer, on arrival, and during handling and processing in the importing country. The standard does not apply to seed<sup>3</sup> and does not specifically address issues related to living modified organisms (LMOs), food safety, climate change and quality.

[12] **Tasks**

[13] The expert working group (EWG) should:

- [14] 1. Identify and analyse existing international guidance such as standards or industry guidelines and practices (including commercial contract specifications) dealing with the international movement of grain and consider the extent to which these address phytosanitary issues and are relevant to the development and application of phytosanitary measures under the provisions of the IPPC. The number and types of pests that have been or maybe introduced via the grain trade and which may be of quarantine concern should be considered.
- [15] 2. Provide guidance for determining through PRA the potential of grain moving in international trade to be a pathway for quarantine pests. The pest risk should be specified for the pest group (distinguishing between, for example, risks from insects and from viruses; considering contamination, for example, by weed seeds), taking into account the intended use of the grain. Guidance should also be provided on assessing the likelihood of establishment of quarantine pests.
- [16] 3. Identify phytosanitary import requirements most commonly used by NPPOs in relation to imported grain. The EWG should also consider providing guidance on the technical justification of the phytosanitary import requirements.
- [17] 4. Identify and provide guidance for NPPOs on appropriate phytosanitary measures and their limitations, including consideration of, for example:

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- [18] a. climatic factors (including those related to treatments)
- b. the specific conditions for grain production, packaging, storage, transport and handling, in particular:
- [19] i. the relevance and limitations of applying the concepts of PFAs, areas of low pest prevalence and pest free places of production, taking into account current industry practices and operational limitations
- ii. the application of one or more pest risk mitigation measures, which may reduce the pest risk to a level that provides an appropriate level of protection to importing countries, while considering the intended use of the product
- iii. any common practices that affect pest risk where specific guidance could be included
- iv. sampling methods in relation to the pest of concern
- [20] c. pest risk mitigation measures, including:
- [21] i. secure storage, processing, packaging or confinement of grain before, during shipping and post shipment during transfer
- ii. phytosanitary treatments of grain
- iii. situations at and after import such as the method of unloading, storage and transport or the processing of grain at destination (e.g. milling, oilseed crushing, malting, biofuel production, pelleting, or cleaning and packaging/repackaging for retail sale)
- iv. confinement and appropriate disposal or treatment of screenings or residues derived from cleaning the grain before processing, packaging or consumption
- v. conveyance and packaging measures.
- [22] 5. Discuss the need for guidance on specific situations (e.g. sampling or inspection protocols for pest detection that are, for example, appropriate to the consignment size and packaging) that could be included in appendixes or annexes to the ISPM.
- [23] 7. Consider whether the ISPM could affect in a specific way (positively or negatively) the protection of biodiversity and the environment. If this is the case, the impact should be identified, addressed and clarified in the draft ISPM.
- [24] 8. Consider implementation of the standard by contracting parties and identify potential operational and technical implementation issues. Provide information and possible recommendations on these issues to the Standards Committee.
- [25] 9. Recommend, where appropriate, the development of supplementary material to aid implementation by contracting parties.
- [26] **Provision of resources**
- [27] Funding for the meeting may be provided from sources other than the regular programme of the IPPC (FAO). As recommended by ICPM-2 (1999), whenever possible, those participating in standard setting activities voluntarily fund their travel and subsistence to attend meetings. Participants may request financial assistance, with the understanding that resources are limited and the priority for financial assistance is given to developing country participants.
- [28] **Collaborator**
- [29] To be determined.
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**[30] Steward**

**[31]** Please refer to the *List of topics for IPPC standards* posted on the International Phytosanitary Portal (IPP) (see <https://www.ippc.int/index.php?id=207776>).

**[32] Expertise**

**[33]** Eight to ten phytosanitary experts with collective expertise in the following areas: development or implementation of phytosanitary measures to manage pest risks associated with the international movement of grain; PRA; grain inspection, testing or storage; and existing international guidance for the international movement of grain or other plant products. Expertise in exporting and importing countries' needs should be equally represented.

**[34]** In addition to these experts, two or three experts from the grain industry (producing, trading, handling or processing) or from relevant international organizations may be invited to participate at the EWG meeting(s) or part of a meeting as invited experts.

**[35] Participants**

**[36]** To be determined.

**[37] References**

**[38]** The IPPC, relevant ISPMs and other national, regional and international standards and agreements as may be applicable to the tasks, discussion papers submitted in relation to this work; and guidance provided from the Open-Ended Workshop on the International Movement of Grain (Vancouver, December 2011).

**[39] Discussion papers**

**[40]** Participants and interested parties are encouraged to submit discussion papers to the IPPC Secretariat ([ippc@fao.org](mailto:ippc@fao.org)) for consideration by the EWG.