



NAPPO

North American Plant Protection Organization
Organización Norteamericana de Protección a las Plantas

NAPPO Conference Call/Meeting Report

Expert Group:	Grains-International movement of grains	
Location:	Conference call	
Date:	July 25, 2016	
Chairperson:	George Galasso, APHIS	
Participants:		
George Galasso, APHIS	Gary Martin, NAEGA	Rebecca Lee, NAPPO
Rajesh Ramarathnam, CFIA	Rosalind Leeck, US-Industry	Nedelka Marin-Martinez, NAPPO
Andrés Quezada, SENASICA	Stephanie Dubon, APHIS	Marina Zlotina, APHIS
Lynn Evans-Goldner, APHIS	Katharine Church, CFIA	Alonso Suazo, NAPPO
Ricardo Calderon, MX-Industry		
Summary/Resumen		
Project:	Develop a NAPPO discussion document in preparation for the IPPC Expert Working Group (EWG) tasked with the development of an ISPM on International Movement of Grain.	
General comments:	<p>Marina Zlotina, APHIS, started the discussion of Diversion from End Use and Traceability</p> <ul style="list-style-type: none"> • Traceability-no IPPC approved guidance, not a recognized phytosanitary measure, but rather a tool available to exporting countries to be used in response to a phytosanitary incident. • Intended use, risk categorization-refer to ISPM 32 – Categorization of Commodities According to their Pest Risk. • Diversion from intended use-legitimate concern if technically justified by pest risk assessment specifically focused on diverted content; needs estimate of volume diverted and separate evaluation of that portion with respect to nature of diversion (ex. Spillage, intentional for planting or otherwise). <p>Gary Martin, NAEGA, Issue of industry view of noncompliance notice and appeal; transparency and predictability. Gary recommended language be added to the discussion paper, consistent with Regulatory Coherence Provisions of the TPP:</p> <ul style="list-style-type: none"> • Encouraging transparency to enhance predictability; maintenance and availability to interested parties of a record of noncompliant incidents, their appeal and the 	

	<p>resulting decisions.</p> <ul style="list-style-type: none"> • Encouraging use of “rapid response mechanism” for review of incidents of noncompliance. <p>Rosalind Leeck, USSEC, description of AQSIQ concerns about foreign material (seconded by Rajesh).</p> <ul style="list-style-type: none"> • CSNA/USSEC Oilseed Summit, July 13-15, 2016, Chengdu presentation by AQSIQ focused on the need to control foreign material as a phytosanitary measure. One percent of foreign material mentioned. Intent expressed by AQSIQ to bring proposals to standard work group in Melbourne, Australia. • Will translate and provide AQSIQ presentation to NAPPO discussion paper working group.
Areas of Consensus	<ul style="list-style-type: none"> • Need for a general statement upfront that grain is a low risk product; that there is insufficient historical basis for consideration of grain as a product with heightened risk necessitating revision of import requirements (Rajesh to provide). • Redrafted opening statement under Article #3 as follows; <i>Each country as a sovereign right to establish import requirements for the entry of plant products into its territory in order to avoid introduction and spread of regulated pests, provided they are made necessary by phytosanitary considerations, are technically justified, are consistent with the pest risk involved and represent the least restrictive measure available, and result in the minimum impediment of the international movement of people, commodities and conveyances.</i> • Main concerns were identified as: <ul style="list-style-type: none"> ○ Phytosanitary measures often lack technical justification-action is often not supported by PRAs <ul style="list-style-type: none"> ▪ Often based on the possibility of entry, not the required standard of probability of introduction and spread. ▪ Intended use is often overlooked, instead the focus is on diversion from intended use. That diversion is often not the subject of a targeted risk assessment on the diverted portion. ▪ Quarantine and non-quarantine pests are often not adequately distinguished, leading to misapplication of measures, particularly as related to official control. ○ Phytosanitary measures are often restrictive or impractical <ul style="list-style-type: none"> ▪ Traceability (see above discussion) ▪ Registration of exporters or exporting facilities. ▪ Systems approaches, particularly involving pest management plans.

	<ul style="list-style-type: none"> ▪ Other non-phytosanitary measures-quality restrictions, i.e. foreign material limit, other (food safety, GMO, etc.) ○ Handling of non-compliance (Canada and US contribution, Mexico noted no issues of concern) <ul style="list-style-type: none"> ▪ Inadequate basis for action ▪ Inappropriate application of emergency measures ▪ Lack of sufficient notice to NPPO and commercial agents ▪ Inadequate consideration of alternative postharvest measures, including compliance agreements.
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Next Steps

Responsible Person	Action	Date
George Galasso, APHIS	Contact Stephen Butcher, International Movement of Grain steward about use of material from and citation of Diversion from End Use consultant paper and editing /consolidation of member contributions to discussion paper (due Aug 3, 2016)	By Aug 3, 2016
Andrés Quezada, SENASICA	Comments regarding discussion of Group B (Mexico) contribution to discussion paper (July 27)	Before Aug 8, 2016
Gary Martin, NAEGA	Paragraph summarizing TPP-Regulatory Coherence Provision consistent with the NAEGA/IGTC position on noncompliance and appeals; transparency and predictability.	Before Aug 8, 2016
Rosalind Leek, US-Industry	Translation and provision of AQSIQ presentation at CSNA/USSEC July 13-15, 2016, Oilseed Summit, Chengdu.	Before Aug 8, 2016
Rajesh Ramarathnam, CFIA	General statement, paragraph on application of end use concept to grain and lack of historical basis for heightened risk stance, implications for import requirements.	Before Aug 8, 2016

Next Meeting

Location:	Conference call
Date:	August 8 th at 3:00pm EDT (2:00pm Mexico time)

Proposed Agenda Items

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3.