ISPM No. 23



INTERNATIONAL STANDARDS FOR PHYTOSANITARY MEASURES

ISPM No. 23

GUIDELINES FOR INSPECTION

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ENDORSEMENT

This standard was endorsed by the Interim Commission on Phytosanitary Measures in April 2005

INTRODUCTION

SCOPE

This standard describes procedures for the inspection of consignments of plants, plant products and other regulated articles at import and export. It is focused on the determination of compliance with phytosanitary requirements, based on visual examination, documentary checks, and identity and integrity checks.

REFERENCES

Export certification system, 1997. ISPM No. 7, FAO, Rome.
Glossary of phytosanitary terms, 2004. ISPM No. 5, FAO, Rome.
Guidelines for a phytosanitary import regulatory system, 2004. ISPM No. 20, FAO, Rome.
Guidelines for pest eradication programmes, 1998. ISPM No. 9, FAO, Rome.
Guidelines for the notification of non-compliance and emergency action, 2001. ISPM No. 13, FAO, Rome.
Guidelines on lists of regulated pests, 2003. ISPM No. 19, FAO, Rome.
Guidelines on phytosanitary certificates, 2001. ISPM No. 12, FAO, Rome.
Guidelines on phytosanitary certificates, 2001. ISPM No. 12, FAO, Rome.
International Plant Protection Convention, 1997. FAO, Rome.
Pest risk analysis for quarantine pests including analysis of environmental risks and living modified organisms, 2004.
ISPM No. 11, FAO, Rome.
Pest risk analysis for regulated non-quarantine pests, 2004. ISPM No. 21, FAO, Rome
Principles of plant quarantine as related to international trade, 1995. ISPM No. 1, FAO, Rome.
Regulated non-quarantine pests: concept and application, 2002. ISPM No. 16, FAO, Rome.
The use of integrated measures in a systems approach for pest risk management, 2002. ISPM No. 14, FAO, Rome.

DEFINITIONS

Definitions of phytosanitary terms used in the present standard can be found in ISPM No. 5 (*Glossary of phytosanitary terms*).

OUTLINE OF REQUIREMENTS

National Plant Protection Organizations (NPPOs) have the responsibility for "the inspection of consignments of plants and plant products moving in international traffic and, where appropriate, the inspection of other regulated articles, particularly with the object of preventing the introduction and/or spread of pests." (Article IV.2c of the IPPC, 1997).

Inspectors determine compliance of consignments with phytosanitary requirements, based on visual examination for detection of pests and regulated articles, and documentary checks, and identity and integrity checks. The result of inspection should allow an inspector to decide whether to accept, detain or reject the consignment, or whether further analysis is required.

NPPOs may determine that consignments should be sampled during inspection. The sampling methodology used should depend on the specific inspection objectives.

REQUIREMENTS

1. General Requirements

The responsibilities of a National Plant Protection Organization (NPPO) include "the inspection of consignments of plants and plant products moving in international traffic and, where appropriate, the inspection of other regulated articles, particularly with the object of preventing the introduction and/or spread of pests" (Article IV.2c of the IPPC, 1997).

Consignments may consist of one or more commodities or lots. Where a consignment is comprised of more than one commodity or lot, the inspection to determine compliance may have to consist of several separate visual examinations. Throughout this standard, the term "consignment" is used, but it should be recognized that the guidance provided for consignments may apply equally to individual lots within a consignment.

1.1 Inspection objectives

The objective of inspection of consignments is to confirm compliance with import or export requirements relating to quarantine pests or regulated non-quarantine pests. It often serves to verify the effectiveness of other phytosanitary measures taken at a previous stage in time.

An export inspection is used to ensure that the consignment meets specified phytosanitary requirements of the importing country at the time of inspection. An export inspection of a consignment may result in the issuance of a phytosanitary certificate for the consignment in question.

Inspection at import is used to verify compliance with phytosanitary import requirements. Inspection may also be carried out generally for the detection of organisms for which the phytosanitary risk has not yet been determined.

The collection of samples for laboratory testing or the verification of pest identity may be combined with the inspection procedure.

Inspection can be used as a risk management procedure.

1.2 Assumptions involved in the application of inspections

As inspection of entire consignments is often not feasible, phytosanitary inspection is consequently often based on $sampling^{1}$.

The use of inspection as a means to detect the presence of pests in, or to determine or verify the pest level of, a consignment is based on the following assumptions:

- the pests of concern, or the signs or symptoms they cause, are visually detectable
- inspection is operationally practical
- some probability of pests being undetected is recognized.

There is some probability of pests being undetected when inspection is used. This is because inspection is usually based on sampling, which may not involve visual examination of 100% of the lot or consignment, and also because inspection is not 100% effective for detecting a specified pest on the consignment or samples examined. When inspection is used as a risk management procedure, there is also a certain probability that a pest which is present in a consignment or lot may not be detected.

The size of a sample for inspection purposes is normally determined on the basis of a specified regulated pest associated with a specific commodity. It may be more difficult to determine the sample size in cases where inspection of consignments is targeted at several or all regulated pests.

1.3 Responsibility for inspection

NPPOs have the responsibility for inspection. Inspections are carried out by NPPOs or under their authority (see also section 3.1 of ISPM No. 7: *Export certification system*; and section 5.1.5.2 of ISPM No. 20: *Guidelines for a phytosanitary import regulatory system*; Articles IV.2a, IV.2c and V.2a of the IPPC, 1997).

¹ Guidance on sampling will be provided in the ISPM under development.

1.4 Requirements for inspectors

As authorized officers or agents by the NPPO, inspectors should have:

- authority to discharge their duties and accountability for their actions
- technical qualifications and competencies, especially in pest detection
- knowledge of, or access to capability in, identification of pests, plants and plant products and other regulated articles
- access to appropriate inspection facilities, tools and equipment
- written guidelines (such as regulations, manuals, pest data sheets)
- knowledge of the operation of other regulatory agencies where appropriate
- objectivity and impartiality.

The inspector may be required to inspect consignments for:

- compliance with specified import or export requirements
- specified regulated pests
- organisms for which the phytosanitary risk has not yet been determined.

1.5 Other considerations for inspection

The decision to use inspection as a phytosanitary measure involves consideration of many factors, including in particular the phytosanitary requirements of the importing country and the pests of concern. Other factors that require consideration may include:

- the mitigation measures taken by the exporting country
- whether inspection is the only measure or combined with other measures
- commodity type and intended use
- place/area of production
- consignment size and configuration
- volume, frequency and timing of shipments
- experience with origin/shipper
- means of conveyance and packaging
- available financial and technical resources (including pest diagnostic capabilities)
- previous handling and processing
- sampling design characteristics necessary to achieve the inspection objectives
- difficulty of pest detection on a specific commodity
- experience and the results of previous inspections
- perishability of the commodity (see also Article VII.2e of the IPPC, 1997)
- effectiveness of the inspection procedure.

1.6 Inspection in relation to pest risk analysis

Pest risk analysis (PRA) provides the basis for technical justification for phytosanitary import requirements. PRA also provides the means for developing lists of regulated pests requiring phytosanitary measures, and identifies those for which inspection is appropriate and/or identifies commodities that are subject to inspection. If new pests are reported during inspection, emergency actions may be undertaken, as appropriate. Where emergency actions are taken, a PRA should be used for evaluating these pests and developing recommendations for appropriate further actions when necessary.

When considering inspection as an option for risk management and the basis for phytosanitary decision making, it is important to consider both technical and operational factors associated with a particular type and level of inspection. Such an inspection may be required to detect specified regulated pests at the desired level and confidence depending on the risk associated with them (see also ISPM No. 11: *Pest risk analysis for quarantine pests including analysis of environmental risks and living modified organisms*, 2004, and ISPM No. 21: *Pest risk analysis for regulated non-quarantine pests*).

2. Specific Requirements

The technical requirements for inspection involve three distinct procedures that should be designed with a view to ensuring technical correctness while also considering operational practicality. These procedures are:

- examination of documents associated with a consignment
- verification of consignment identity and integrity
- visual examination for pests and other phytosanitary requirements (such as freedom from soil).

Certain aspects of inspection may differ depending on the purpose, such as for import/export purposes, or verification/risk management purposes.

2.1 Examination of documents associated with a consignment

Import and export documents are examined to ensure that they are:

- complete
- consistent
- accurate
- valid and not fraudulent (see section 1.4 of ISPM No. 12: *Guidelines for phytosanitary certificates*).

Examples of documents that may be associated with import and/or export certification include:

- phytosanitary certificate/re-export phytosanitary certificates
- manifest (including bills of lading, invoice)
- import permit
- treatment documents/certificates, marks (such as provided for in ISPM No. 15: *Guidelines on regulating wood packaging material in international trade*) or other indicators of treatment
- certificate of origin
- field inspection certificates/reports
- producer/packing records
- certification programme documents (e.g. seed potato certification programmes, pest free area documentation)
- inspection reports
- commercial invoices
- laboratory reports.

Problems encountered with either import or export documents should, where appropriate, be investigated first with the parties providing the documents before further action is taken.

2.2 Verification of consignment identity and integrity

The inspection for identity and integrity involves checking to ensure that the consignment is accurately described by its documents. The identity check verifies whether the type of plant or plant product or species is in accordance with the phytosanitary certificate received or to be issued. The integrity check verifies if the consignment is clearly identifiable and the quantity and status is as declared in the phytosanitary certificate received or to be issued. This may require a physical examination of the consignment to confirm the identity and integrity, including checking for seals, safety conditions and other relevant physical aspects of the shipment that may be of phytosanitary concern. Actions taken based on the result will depend on the extent and nature of the problem encountered.

2.3 Visual examination

Related aspects of visual examination include its use for pest detection and for verifying compliance with phytosanitary requirements.

2.3.1 Pests

A sample is taken from consignments/lots to determine if a pest is present, or if it exceeds a specified level. The ability to detect in a consistent manner the presence of a regulated pest with the desired confidence level requires practical and statistical considerations, such as the probability of detecting the pest, the size of the lot, the desired level of confidence, the sample size and the intensity of the inspection (see ISPM on sampling -under development).

If the objective of inspection is the detection of specified regulated pests to meet phytosanitary import requirements, then the sampling method should be based on a probability of detecting the pest that satisfies the corresponding phytosanitary requirements.

If the objective of the inspection is the verification of the general phytosanitary condition of a consignment/lot, such as when:

- no specified regulated pests have been identified
- no specified pest level has been identified for regulated pests
- the aim is to detect pests when there has been a failure of a phytosanitary measure,

then sampling methodology should reflect this.

The sampling method adopted should be based on transparent technical and operational criteria, and should be consistently applied (see also ISPM No. 20: *Guidelines for a phytosanitary import regulatory system*).

2.3.2 Compliance of phytosanitary requirements

Inspection can be used to verify the compliance with some phytosanitary requirements. Examples include:

- treatment
- degree of processing
- freedom from contaminants (e.g. leaves, soil)
- required growth stage, variety, colour, age, degree of maturity etc.
- absence of unauthorized plants, plant products or other regulated articles
- consignment packaging and shipping requirements
- origin of consignment/lots
- point of entry.

2.4 Inspection methods

The inspection method should be designed either to detect the specified regulated pests on or in the commodity being examined, or to be used for a general inspection for organisms for which the phytosanitary risk has not yet been determined. The inspector visually examines units in the sample until the target or other pest has been detected or all sample units have been examined. At that point, the inspection may cease. However, additional sample units may be examined if the NPPO needs to gather additional information concerning the pest and the commodity, for example if the pest is not observed, but signs or symptoms are. The inspector may also have access to other non visual tools that may be used in conjunction with the inspection process.

It is important that:

- examination of the sample be undertaken as soon as reasonably possible after the sample has been drawn and that the sample is as representative of the consignment/lot as possible.
- techniques are reviewed to take account of experience gained with the technique and of new technical developments.
- procedures are put in place to ensure the independence, integrity, traceability and security of samples for each consignment/lot.
- results of the inspection are documented.

Inspection procedures should be in accordance with the PRA where appropriate, and should be consistently applied.

2.5 Inspection outcome

The result of the inspection contributes to the decision to be made as to whether the consignment meets phytosanitary requirements. If phytosanitary requirements are met, consignments for exports may be provided with appropriate certification, e.g. phytosanitary certificates, and consignments for import will be released.

If phytosanitary requirements are not met, further actions can be taken. These actions may be determined by the nature of the findings, considering the regulated pest or other inspection objectives, and the circumstances. Actions for non-compliance are described in detail in ISPM No. 20 (*Guidelines for a phytosanitary import regulatory system*), section 5.1.6.

In many cases, pests or signs of pests that have been detected may require identification or a specialized analysis in a laboratory or by a specialist before a determination can be made on the phytosanitary status of the consignment. It may be decided that emergency measures are needed where new or previously unknown pests are found. A system for properly documenting and maintaining samples and/or specimens should be in place to ensure trace-back to the relevant consignment and to facilitate later review of the results if necessary.

In cases of repeated non-compliance, amongst other actions, the intensity and frequency of inspections for certain consignments may be increased.

Where a pest is detected in an import, the inspection report should be sufficiently detailed to allow for notifications of non-compliance (in accordance with ISPM No. 13: *Guidelines for the notification of non-compliance and emergency action*). Certain other record-keeping requirements may also rely on the availability of adequately completed inspection reports (e.g. as described in Articles VII and VIII of the IPPC, ISPM No. 8: *Determination of pest status in an area,* and ISPM No. 20: *Guidelines for a phytosanitary import regulatory system*).

2.6 Review of inspection systems

NPPOs should conduct periodic reviews of import and export inspection systems to validate the appropriateness of their design and to determine any course of adjustments needed to ensure that they are technically sound.

Audits should be conducted in order to review the validity of the inspection systems. An additional inspection may be a component of the audit.

2.7 Transparency

As part of the inspection process, information concerning inspection procedures for a commodity should be documented and made available on request to the parties concerned in application of the transparency principle (ISPM No. 1: *Principles of plant quarantine as related to international trade*). This information may be part of bilateral arrangements covering the phytosanitary aspects of a commodity trade.