

Systems Approach Concept

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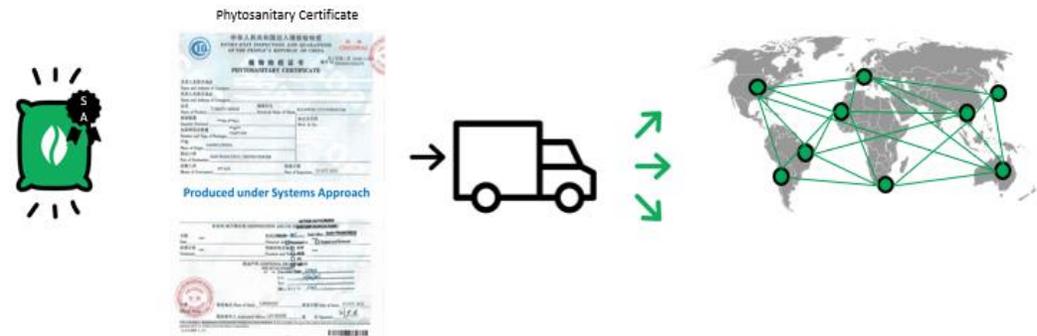
Challenges and possible solution

Challenges in the current trade system

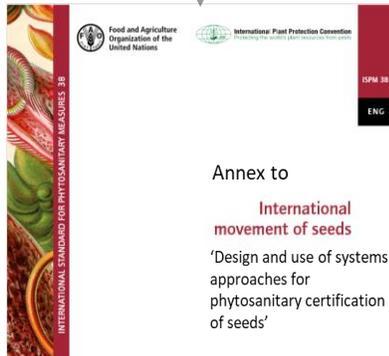
- Consignment-by-consignment certification
- Increasing number of specific pest requirements and variation between NPPOs
- Import requirements can change quickly
- Requirements are not always for pests associated with seeds as a pathway
- Re-export – an important business practice - challenging to fulfill the needs of all countries involved in the chain
- Movement of small lots of seeds for research and breeding purposes increasingly difficult

Systems Approach as possible solution

- Approved companies produce ‘Systems Approach-seed’
- Multilateral acceptance: seeds move freely between all countries where a systems approach has been agreed
- Phytosanitary certificates without the specification of individual pests
- An alternative option for countries to participate



Governance of Systems Approach



Annex & Crop specific Appendices provide the framework for general and specific requirements to be met by participant. Basis for alignment between countries

Participating countries



- Bilateral agreements
- NPPOs collaborate to develop agreement
- NPPO of importing country: agrees to allow importation of seeds produced by approved producers
- NPPO of country of production approves producers in country of production. Auditing

SA participants (seed companies)



- Describe how identified risks are managed
- Quality Management System
 - Risk evaluation
 - Pest Risk Management Plan
 - Monitoring and reporting on emerging pests

In future, participating countries may need/ want increased efficiency: towards multilateral acceptance

In line with ISPM-guidelines – consequences for SA

ISPMs are based on bilateral agreements

Implementation of **multiple, harmonized bilateral** agreements will result in a (close to) multilateral system

- risk of variations between agreements
- variations do not facilitate re-export
- not all NPPOs have the capacity for bilateral negotiations and audits

Example – Pest mgmt. options during pre-planting phase

- use of resistant plant varieties
- use of healthy seeds (free from pests)
- seed treatment
- crop management (e.g. rotation or mixed planting)
- field selection
- soil or growing medium treatment
- geographical or temporal isolation
- sanitation or disinfection of water

Consequence for SA

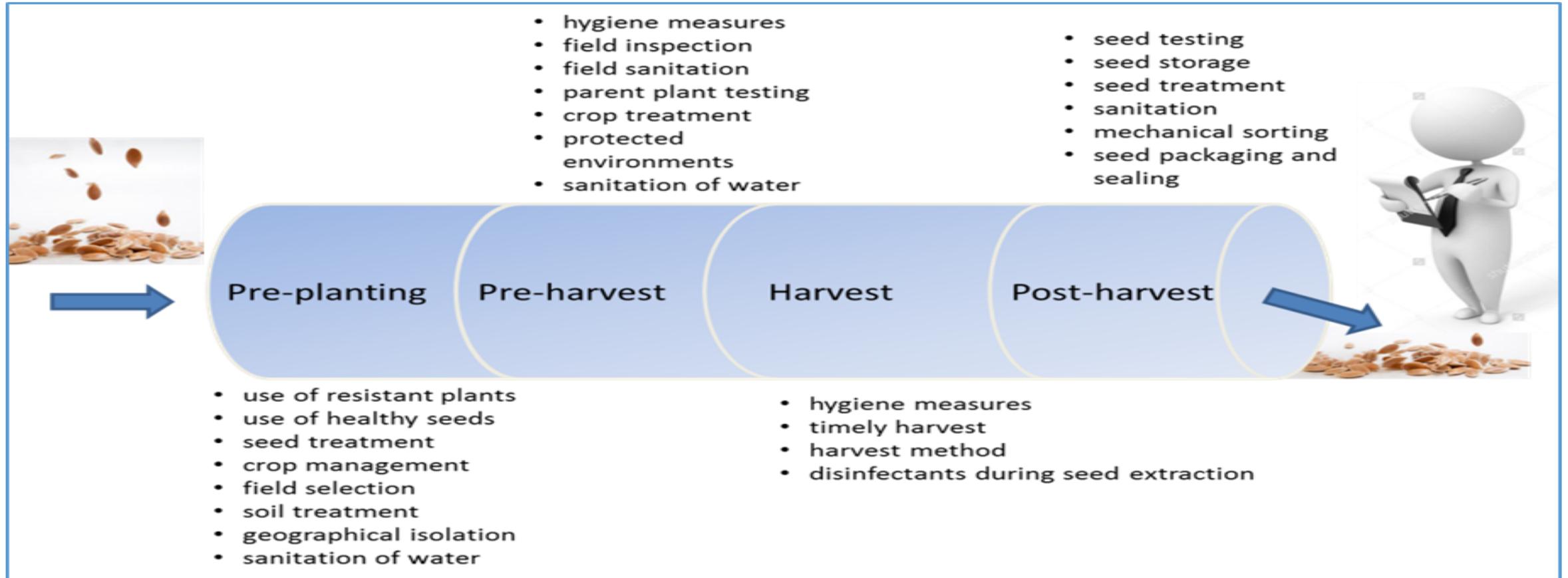
- Annex should contain sufficient detail
 - ✓ List of management options per phase of production (pre-planting, planting, growing, harvest, post-harvest)
 - ✓ Guidance on pathway analysis per crop (group) – how does the pest enter a seed production?

Building Blocks for Systems Approach for seed for sowing

Essential elements of a Systems Approach for seed from an industry point of view are that the system:

- is in line with international standards guidelines
- offers an alternative to consignment by consignment certification for seed companies with certified pest risk management practices
- strives for global harmonization via implementation of multiple, harmonized bilateral (or multilateral) agreements
- is risk-based and data-driven
- is accessible to both small and large seed companies
- is flexible across different crops
- incorporates industry practices (while leaving room for incorporation of innovations)
- is non-competitive

Examples of pest risk management activities that many seed companies already have in place. These activities are mentioned in ISPM38 as options acceptable for pest risk management



Advantages and disadvantages of Systems Approach

Long term solution

- instead of ad hoc solutions per country

More efficient and predictable framework for the international movement of seed

- global harmonization
- reduced workload NPPOs

Pro-actively addresses issues with emerging pathogens

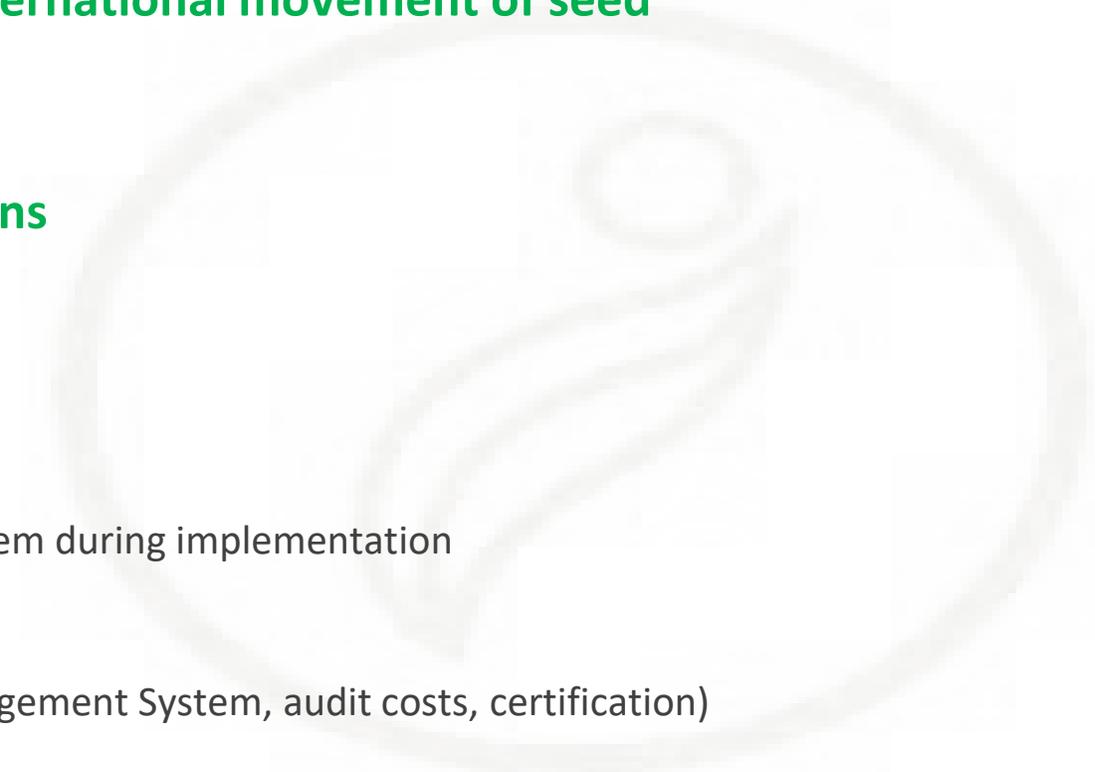
- risk mitigation for one bacterium = potential for all bacteria

Complexity

- SA may be more complex than end-point tests or treatments
- global harmonization via bilateral agreements is challenging
- participant have to fulfill requirements of current and new system during implementation

Costs

- set up and maintain SA-approval for participants (Quality Management System, audit costs, certification)
- bilateral negotiations between NPPOs



ISF Systems Approach WG

Industry Point of View

Michael Leader

APSA 6th Phytosanitary Meeting, August 2020



The long-term vision on Systems Approach for seeds

- Seed companies would be approved by an independent globally accepted body.
- Approval reliant on independent auditing of the quality management system and the specific pest management practices per crop
- Generic phytosanitary certification, valid for all pests regulated for seeds.
- Pest management would be based on the use of a documented quality management system and best practices that manage phytosanitary risks to an acceptable level.
- Best practices would focus on the pests for which seed has been identified as a pathway under practical field conditions in the ISF Regulated Pest List.

Transparency – industry practices and emerging issues

NPPOs need to trust certification based on industry practices

Consequence for SA

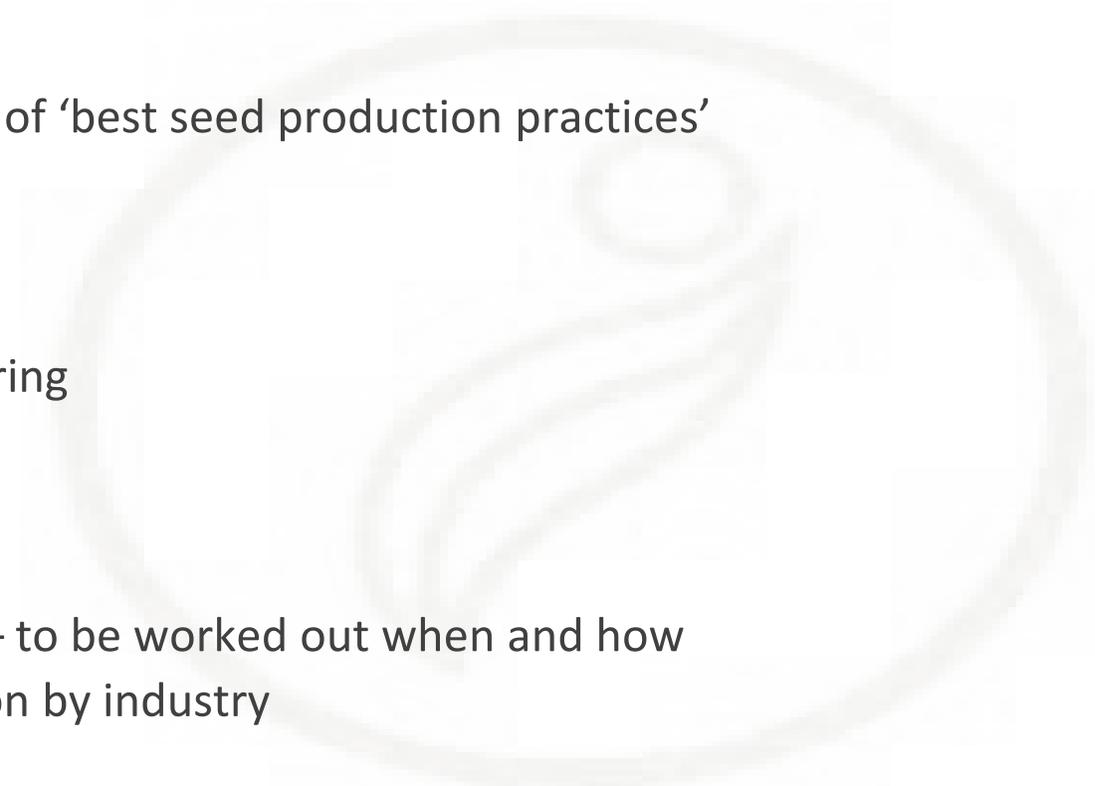
- Transparency about industry practices is essential
- Seed companies need to be ready for open exchange of ‘best seed production practices’

NPPOs want information about emerging issues

Industry need to trust NPPO-reaction to information sharing

Consequence for SA

- Information sharing is mandatory for SA-companies
- Procedure to share information with relevant NPPO – to be worked out when and how
- Sharing wider after consolidation of global information by industry



DRAFT SPECIFICATION FOR ISPM: Annex *Design and use of systems approaches for phytosanitary certification of seeds* (2018-009) to ISPM 38

1. The seed industry is supportive of the proposed draft specification from the IPPC to develop a Systems Approach Annex for ISPM 38
2. We acknowledge the recognition from the IPPC Secretariat of the challenges that the seed industry faces in the current phytosanitary system.
3. A harmonized framework is very important for the international movement of seeds and the seed industry is pleased that it has been specifically referenced
4. Industry is supportive of the recognition of industry pest management practices as one of the building blocks of the systems approach.
5. For seed companies, a multilateral Systems Approach is required, as compared with existing Systems Approaches used for fruits and vegetables based on ISPM14, which are via bilateral agreements between countries.
6. Participation of a seed industry participant was very valuable for both parties during the development of ISPM 38 and we would ask that this collaboration continue as part of this process

ISF Systems Approach Working Group

Current Activities

- Pilot
- Industry best practices
- Sharing information related to emerging pests



Role of NPPOs in relation to Systems Approach for Seeds

- to recognize or approve of SA for seeds as an alternative to consignment based phytosanitary requirements
- to engage into developing and agreeing on bilateral/ multilateral agreements with countries importing seeds from or supplying seeds to their country, to enable SA as alternative option for phytosanitary certification.
- to certify facilities based on auditing by themselves or on basis of recommendations by approved entities
- to maintain and publish a register of certified facilities
- to decide on suspension, exclusion and re-acceptance (re-certification) of facilities of participants/ participants
- to ensure that auditing is done in a uniform and harmonized way
- to check if the seed supplier exporting seeds with a SA Additional Declaration on the phytosanitary certificate is in the register of certified facilities.



Seed is Life