**Statement from Japan on Draft ISPM: Audit in the phytosanitary context**

**(Agenda item 9.2)**

1. At the Sixteenth Session of the Commission on Phytosanitary Measures (CPM-16), Japan would like to share with the Contracting Parties its proposal on the agenda item 9.2 “Adoption of International Standards for Phytosanitary Measures (ISPMs)”, specifically to the draft ISPM on audit in the phytosanitary context (2015-14).
2. As described in the section 1. “Purpose of an audit”, the proposed ISPM covers three types of audits:

1) audit to the NPPO’s own systems and procedures;

2) audit to the systems and procedures of entities that have been authorized by the NPPO; and

3) audit to the systems and procedures of the NPPO of an exporting country.

1. The requirements for the three types of audits are set up all together in this standard except for only section 4. “Roles and responsibilities”. Japan however thinks that the whole requirements should be described separately for the audit in its own territory (2. 1) and 2) above) and for the audit in an exporting country (2. 3) above) as per the following reasons:

* There is a significant difference between the natures of the audit in its own territory and the audit in an exporting country.
* The audit in an exporting country requires coordination between an auditee country and an auditing country.
* The audit in an exporting is directly related to an international trade.
* The audit in its own territory should comply with rather national legislations than international standards.

1. For example, the steps in the audit process are considerably different between two types of audits. A notification should be made prior to the audit in an exporting country without any exemption, while an unscheduled audit may be conducted in its own territory where there is a critical nonconformity as descried in Section 11.1.1 scheduling of audits.
2. For reference, Codex has separate standards for monitoring the national food control system (CAC/GL 91-2017) and for assessment of foreign official inspection and certification system (CAC/GL 26-1997 Annex) although they don’t necessarily focus on audit.
3. Japan feels regrettable that Japan is making the comment in the last stage without having provided this comment during the previous country consultations, however this point has been noticed during the final review of the standard and identified as an important issue to raise in the CPM.
4. Based on the above background, Japan would like to suggest revising the ISPM to describe separately the requirements for the audit in its own territory and for the audit in an exporting country.
5. **The CPM is invited to:**
6. review the statement from Japan on Draft ISPM “Audit in the phytosanitary context”
7. discuss and decide whether the draft ISPM should be revised to separate the requirements between the audit in its own territory and the audit in an exporting country.