

Patent Cooperation Treaty (PCT) Working Group

Nineteenth Session
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SEQUENCE LISTINGS TASK FORCE: STATUS REPORT

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BACKGROUND

1. The Sequence Listings Task Force was created by the Committee on WIPO Standards (CWS), at its first session (October 25 to 29, 2010), to perform Task No. 44, that is “to prepare a recommendation on the presentation of nucleotide and amino acid sequence listings based on eXtensible Markup Language (XML) for adoption as a WIPO standard”. The European Patent Office (EPO) was assigned the role of Task Force Leader. The Task Force was also requested “to liaise with the appropriate PCT body regarding the possible impact of such a Standard on Annex C to the Administrative Instructions under the PCT” (see paragraph 29 of document CWS/1/10).
2. At its reconvened fourth session, WIPO Standard ST.26 was adopted by the CWS in 2016. In October 2021, at the fifty-third session of the PCT Assembly, the amendments to the PCT Regulations to implement WIPO Standard ST.26 in the PCT System were adopted. The WIPO General Assembly approved to delay the “big bang” implementation date of WIPO Standard ST.26 to July 1, 2022, at national, regional and international levels (see document WO/GA/54/14 and paragraphs 178 to 183 of document WO/GA/54/15).
3. At the eleventh session of the CWS in 2023, the CWS approved a revision of the description of Task No. 44, which reads now as follows:

“Support the International Bureau by testing new releases based on available resources and providing user feedback on the WIPO Sequence Suite; and prepare necessary revisions of WIPO Standard ST.26”.

4. Since the Standard was adopted in 2016, there have been several updates resulting in versions 1.1, 1.2, 1.3, 1.4, 1.5 and 1.6. The Standard was also revised at the eleventh session, held in December 2023, when the CWS adopted version 1.7 that is currently in force, adding new examples to Annex VI of WIPO Standard ST.26 and the Appendix to Annex VI.
5. Since the eleventh session of the CWS, discussions of the Task Force have centered on two proposals for substantive revisions of the Standard, in addition to a number of improvements and corrections:
- (a) a proposal to require a subset of nucleotide analogs and peptide analogs to be represented by the corresponding unmodified residue symbol; and
 - (b) a proposal to lift the minimum sequence length requirement and allow short sequences – i.e., sequences with less than 10 specifically defined nucleotides or less than 4 specifically defined amino acids – to be included in the sequence listing.
6. No proposal for revision to WIPO Standard ST.26 was submitted to the CWS at the twelfth session in September 2024 as further discussions and consultations were considered necessary by the Task Force on the two proposals.

PROGRESS REPORT

7. Since the twelfth session of the CWS, the Task Force has met online five times to discuss the proposals for the revision of WIPO Standard ST.26 and related issues, as well as the progress made with the development of the WIPO Sequence Suite, for which the Task Force provided support.

REVISION OF WIPO STANDARD ST.26

8. With a view to obtaining user feedback on lifting the minimum length requirement for sequence listings in WIPO Standard ST.26, and whether the proposal to lift it would find support, the Task Force approved a user survey, to be conducted by the International Bureau. The user survey was open from January 23 until March 31, 2025. A total of 1,114 responses (both complete and incomplete) were received; 61 per cent of the responses expressed support for lifting the minimum length requirement.
9. During the subsequent meetings of the Task Force and through discussions undertaken on the electronic forum (hereinafter referred to as the wiki), members of the Task Force engaged in the analysis of the results of the user survey and the merits of the proposal. In light of the broad user support, consensus was reached by the Task Force to propose to the CWS the lifting of the minimum length requirement by optionally allowing the inclusion of short sequences.
10. The Task Force also discussed, during its meetings, on the wiki, and in small group discussions between Task Force members having expressed a position, the proposal to make the representation of a subset of nucleotide analogs and peptide analogs mandatory. Following extensive discussions, consensus was eventually reached to include this proposal in the revised draft Standard.
11. The Task Force thus agreed to submit to the thirteenth session of the CWS in November 2025 for approval a proposal for revision of WIPO Standard ST.26 in the form of version 2.0 (see paragraph 5 and the Annex of document CWS/13/16 Rev.) comprising:
- amendments aimed at requiring a subset of nucleotide analogs and peptide analogs to be represented by the corresponding unmodified residue symbol;
 - amendments aimed at lifting the minimum sequence length requirement;

- improvements and corrections to the existing text in version 1.7.

IMPLEMENTATION PLAN

12. With regard to the implementation method, in view of the different implications of the two substantive proposals for revision of the Standard, the Task Force recommended the following (see paragraph 9 of document CWS/13/16 Rev.):

- (a) As regards the lifting of the minimum length requirement, given this amendment would merely provide applicants an option, and with a view to avoiding the need for having two parallel versions of WIPO Sequence Suite for creating and validating sequence listings, or even two different tools in parallel, this change should apply as from the date the new version of WIPO Standard ST.26 enters into force, irrespective of the filing date of the patent application concerned.
- (b) As regards the mandatory inclusion of subsets of nucleotide analogs and peptide analogs and clarifications of a mandatory character, given that this would require applicants to include additional sequences in the sequence listing, this change should apply to sequence listings filed for a patent application with a filing date – not a priority date – on or after the date the new version of WIPO Standard ST.26 enters into force. This would allow the transition to be solely based on the filing date and allow priority dates and the status of an application as a continuation, continuation-in-part or divisional to be ignored.

13. With a view to giving sufficient preparation time for applicants and Offices, allowing for any necessary updates to the legal framework being promulgated on time, and ensuring timely updates of the relevant software tools for creating and validating sequence listings (WIPO Sequence Suite), the Task Force recommended July 1, 2027, as the date of entry into force of the new version of WIPO Standard ST.26.

ADOPTION OF THE NEW VERSION FOR THE STANDARD AND NEXT STEPS

14. At its thirteenth session in November 2025, the CWS approved the proposed revision to WIPO Standard ST.26 as version 2.0 and approved the date of entry into force as July 1, 2027. The CWS also agreed on the transition requirement as proposed by the Sequence Listings Task Force (see document CWS/13/16 Rev.), as set out in an editorial note on the first page of version 2.0 of WIPO Standard ST.26 as follows:

“The Thirteenth Session of the Committee on WIPO Standards decided that version 2.0 of ST.26 will enter into force on July 1, 2027 and apply to all patent applications with a filing date on or after that date.

Exceptionally, paragraph 8 of this Standard will apply as from the date of entry into force of version 2.0, independent of the filing date of the patent application concerned.”¹

15. The CWS also agreed that version 2.0 of WIPO Standard ST.26 should be presented to the WIPO General Assembly in 2026.

16. At the most recent meeting of the Task Force on November 13, 2025, during the thirteenth session of the CWS, the Task Force noted that, although there were still items under discussion, there was no general support for presenting a new proposal for revision of the Standard for approval to the CWS at its fourteenth session in November 2026.

¹ Paragraph 8 of version 2.0 of WIPO Standard ST.26 concerns the minimum length requirement.

WORK PLAN

17. The following items are considered a priority in the upcoming year for the Sequence Listings Task Force:

- (a) Facilitating preparations for the entry into force of version 2.0 of WIPO Standard ST.26 and its implementation, including by liaising with International Nucleotide Sequence Database Collaboration (INSDC) and its members;
- (b) Collaborating on any further revisions of WIPO Standard ST.26, if required, to further facilitate its implementation by Offices and applicants while remaining aligned with the requirements of INSDC and the Universal Protein Resource (UniProt); and
- (c) Supporting the International Bureau by testing new releases of WIPO Sequence Suite and passing on user feedback regarding their use of WIPO Sequence.

18. *The Working Group is invited to note the contents of this document.*

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