

DRAFT

## IMPLEMENTING GUIDELINES FOR REGULATING WOOD PACKAGING MATERIAL IN INTERNATIONAL TRADE

### Definition of Terms

Commodity	A type of plant, plant product, or other article being moved for trade of other purpose (FAO, 1990; revised ICPM, 2001)
Dunnage	wood packaging material used to secure or support a commodity but which does not remain associated with the commodity (FAO, 1990; revised ISPM Pub. No. 15, 2002)
Fumigation	treatment with a chemical agent that reaches the commodity wholly or primarily in a gaseous state (FAO, 1990; revised FAO, 1995)
Mark/Marking	an official stamp or brand, internationally recognized, applied to a regulated article to attest its phytosanitary status (ISPM Pub. No. 15, 2002)
Phytosanitary measure	Any legislation, regulation or official procedure having the purpose to prevent the introduction and or spread of quarantine pests, or to limit the economic impact of regulated non-quarantine pests (FAO, 1995; revised IPPC, 1997; ISC, 2001)
Quarantine pest	a pest of potential economic importance to the are endangered thereby and not yet present there, or present but not widely distributed and being officially controlled [FAO, 1990; revised FAO,1995; IPPC 1997]
Raw wood	wood which has not undergone processing or treatment [ISPM Pub. No. 15, 2002)
Thin wood	considered to be 6mm thickness or less according to the Customs Harmonized Commodity Description and Coding System (the Harmonized System or HS)
Treatment	officially authorized procedure for the killing or removal of pests or rendering pests infertile (FAO, 1990; revised FAO, 1995; ISPM Pub. No. 15, 2002)

Veneer peeler cores	by product of veneer production involving high temperatures and comprising the center of a log remaining after the peeling process
Wood packaging material (WPM)	wood or wood products (excluding paper products) used in supporting, protecting or carrying a commodity (includes dunnage) [ISPM Pub. No. 15, 2002)

## 1. Rationale

The Interim Commission on Phytosanitary Measures (ICPM) approved the “*Guidelines for Regulating Wood Packaging Material In International Trade (ISPM 15)*” on 15 March 2002. The approval is brought about after the IPPC determined that the worldwide movement of Wood Packaging Material (WPM) made of unprocessed raw wood is a pathway for the introduction and spread of a variety of pests belonging to the family, *Anobiidae*, *Bostrichidae*, *Buprestidae*, *Cerambycidae*, *Curculionidae*, *Isoptera*, *Lyctidae*, *Oedemeridae*, *Scolytidae* and *Siridae* for insects, and *Bursaphelenchus xylophilus*, a nematode.

The need to regulate was realized because the introduction of pests linked to WPM is a worldwide problem. More often than not, WPM’s are often re-used, recycled or re-manufactured, true origin cannot be determined and phytosanitary status cannot be ascertained.

This also reflects the regulatory guidelines established in International Standard for Phytosanitary Measures No. 15: Guidelines for Regulating Wood Packaging Materials in International Trade.

## 2. Coverage

This guidelines are for coniferous and non-coniferous Wood Packaging Materials which includes the following: *pallets, dunnage, crating, packing blocks, drums cases, load boards, pallet collars, skids*

This regulation does not cover WPM’s made wholly of wood-based products such as *plywood, particle board, oriented strand board or veneer* that have been created using glue, heat and pressure or a combination thereof should be considered sufficiently processed to have eliminated the risk associated with the raw wood

Wood packaging material such as *veneer peeler cores, sawdust, wood wool, and shavings*, and *raw wood cut into thin pieces* may not be pathways for introduction of quarantine pests and will not be regulated unless the technical bases are available.

### 3. Measures for Implementation

#### 3.1. Accreditation of Treatment Facilities/ Service Providers

##### Criteria for Accreditation

- Licensed by the Fertilizer and Pesticide Authority (FPA) for fumigators
- Should have the sufficient equipment for fumigation or heat treatment

Minimum Required Equipment - Accredited treatment companies should have the following equipment:

##### For Fumigation Companies

- Circulator
- Aerator
- Evaporator
- Adequate monitoring tubes/ devices
- Marking equipment approved by BPI

##### For Heat Treatment Companies

- Sufficient number of temperature probes (minimum of 5 sensor probes/chamber)
- Heat treatment chamber
- Temperature and Data Logger

##### Steps for Accreditation for Fumigation Companies/ Facilities

- I. Fumigation companies should apply for accreditation to the BPI.
- II. Present the following documents (FPA license, DTI/SEC Registration, Mayors Permit, TIN number) for evaluation
- III. BPI-PQS shall inspect and evaluate the facilities and equipment of the fumigation company
- IV. Recommendation by the PQS Chief prior to the final approval of the BPI Director.
- V. Certificate of Accreditation shall be issued with the assigned code.

##### Steps for Accreditation for Heat Treatment Companies

- I. Heat Treatment companies should apply to the BPI.
- II. Present the following documents (FPA license, DTI/SEC Registration, Mayors Permit, TIN number) for evaluation

- III. BPI-PQS shall inspect and evaluate the facilities and equipment of the heat treatment company
- IV. Recommendation by the PQS Chief prior to the final approval of the BPI Director.
- V. Certificate of Accreditation shall be issued with the assigned code.

Monitoring/ Reporting

The accredited company/ service provider conducting treatment is required to submit to BPI the following information on a weekly basis:

- I. Number of WPM treated and estimated weight
- II. Number of WPM used and its destination
- III. Kind of treatment applied
- IV. Company/ Exporter who used the WPM

3.2. Treatment

- Treatment should be done by accredited treatment companies/ service provider
- Treatment of WPM is mandatory to all countries implementing ISPM
- Treatment **should always be done** in the presence of a Plant Quarantine Officer
- Treatment report with approved PQS codes shall be prepared and signed by the attending PQO
- Approved PQS codes should match to the codes displayed on the markings of the WPM.
- Recycled, remanufactured or repaired wood packaging material should be **re-certified** and **remarked**. All components of such material should be treated. **Old mark should be obliterated as per the standard**

Methyl Bromide Fumigation

1. Methyl Bromide (MB) fumigation – treatment should be indicated by **MB** mark, following the minimum standard for MB fumigation treatment for wood packaging material.
2. The minimum temperature should not be less than 10°C and the minimum exposure time should be 16 hours.

Temperature	Dosage rate	Minimum concentration (g/m <sup>3</sup> )			
		0.5hrs	2hrs	4hrs	16hrs
<b>21°C or above</b>	48	36	24	17	14
<b>16°C or above</b>	56	42	28	20	17
<b>11°C or above</b>	64	48	32	22	19

### Heat treatment

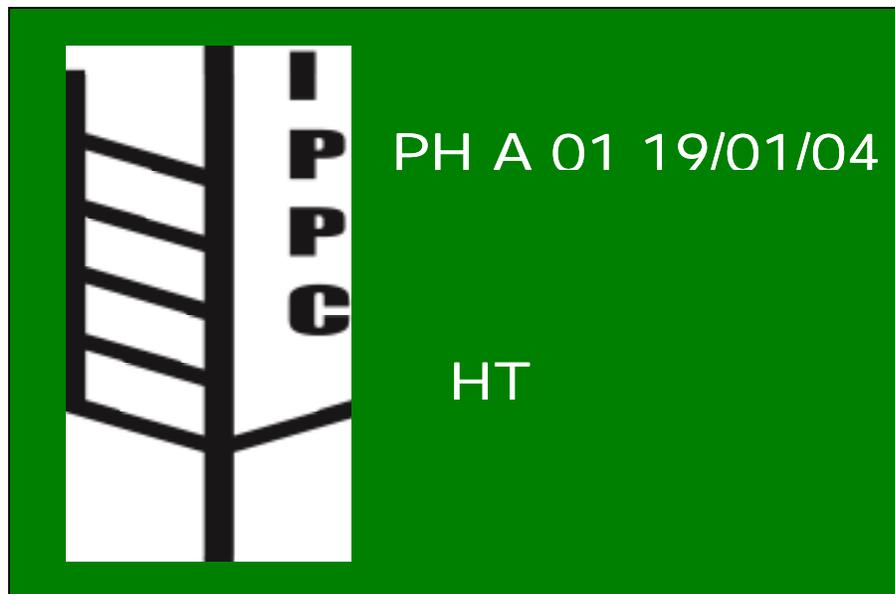
1. Wood packaging material should be treated in accordance with the specific time temperature schedule required to meet the **minimum wood core temperature of 56°C for a minimum of 30 minutes.**
2. Treatment should be indicated by **HT mark.**

### 3.3. Recommended Marking

Wood packaging materials subjected to the approved measures should display the approved marking using spray paint.

#### Approved Marking Should Be:

- SIZE - 3" x 4"
- GREEN in color (color is not a requirement of the standard)
- According to the model
- Legible
- Permanent and non-transferable
- Placed in a visible location (on two sides)
- **MB** (methyl bromide) or **HT** (heat treatment) mark should appear on the marking to indicate the kind of treatment applied



## System of Coding

### PH A 01 19/01/2004

PH – ISO Country Code  
A - Company  
01 - Batch  
19/01/2004 - Date of Fumigation

\*\*\*The Bureau of Plant Industry being the NPPO shall have its own code for marking and will be used whenever necessary.

#### 3.4. Sanctions for non-compliance

1. **Non-compliance** of the treatment covers the following:
  - I. Misuse/ improper marking
  - II. Non-acceptance of the importing country due to treatment failure
  - III. Non-submission of reports
  - IV. Failure to inform the PQO prior to treatment
2. First offense
  - Reprimand in writing
3. Second offense
  - Revoked accreditation

## EXPORT

1. All shippers or exporters using WPM should apply and accomplish an application form for WPM prior to exportation at least 7 days before the shipment (to give time for PQO scheduling)
2. For destinations that does not yet implement ISPM 15, inspection should be deemed sufficient until the destinations decides to implement the standard
3. Treated WPM's should be properly secured after treatment to avoid recontamination/ re-infestation
4. All WPM's should bear the APPROVED MARK indicating the date of the treatment, code and the kind of treatment used.
5. Treatment of WPM's should be done only by **accredited treatment companies/ service providers of BPI.**
6. Treatment of WPM's should be done in the presence of a PQO.
7. Approved marking should be placed after a successful completion of the treatment

## IMPORT

1. All importers should apply for inspection/clearance at least 24 hours prior to arrival of cargo for all commodities accompanied with WPM
2. Upon arrival, WPM shall be subjected to inspection and clearance by PQ Officer.
3. All trans-shipment shall be inspected/cleared at the final port of destination
4. All WPM should have the required/approved marking. [Note to BPI: There is no requirement for a date to be a part of the approved marking per ISPM15](#)
5. The following Phytosanitary Measures should be followed in the event of the following situations:

### Without approved marking

- Commodity must be put on hold and shall be under guard by PQ Officer
- Should the main commodity with the WPM will not be affected by treatment, conduct treatment at once, if not, stripping off the commodity will be required, recommended treatment will be conducted immediately
- Non-compliance report shall be prepared by the PQO to be submitted immediately to the NPPO of the country of origin, copy furnished the PQS and importer
- Any non-compliant wood packaging materials must be at all times stored in a closed container that is effective in ensuring that pests may not be allowed to enter the environment. Storage areas of non-compliant wood packaging materials must be isolated from other domestic wood commodities, materials that has already undergone processing and adjacent forested lands by no less than 30 meters.
- If the non-compliant wood packaging material is buried, it should be buried at a minimum depth of 3 meters below the surface of the ground. The wood must be buried at a site where-re-excavation of the material will not occur. Woods must not be left exposed within the burial pit.
- [Note to BPI: Suggest there be an option for re-export of the commodity](#)

### With approved marking but with live quarantine pest found

- Commodity should be subject to treatment at once if possible, if not, return to sender/country of origin at the exporter's/ importer's expense. [Suggest there be an option for destruction. The U.S. will allow for destruction of the wood packaging if quarantine pest is found.](#)
- Non-compliance report shall be prepared by the PQO to be submitted immediately to the NPPO of the country of origin, copy furnished the PQS and importer

## NON-AGRICULTURAL COMMODITIES

1. All importers should apply for inspection/clearance at least 24 hours prior to arrival of cargo for all commodities accompanied with WPM

2. Upon arrival, WPM shall be subjected to inspection.
3. All trans-shipment shall be inspected/cleared at the final port of destination
4. All WPM should bear the required/approved marking.
5. The following Phytosanitary Measures should be followed in the event of the following situations:

Without approved marking

- Commodity must be put on hold and shall be under guard by PQ Officer
- Should the commodity with the WPM will not be affected by treatment, conduct recommended treatment at once at the port area.
- Should the treatment be done to a specified site or processing, the non compliant wood packaging material must be moved in a closed container directly to the site at which disposal or processing is going to take place.
- Any non-compliant wood packaging materials must be at all times stored in a closed container that is effective in ensuring that pests may not be allowed to enter the environment. Storage areas of non-compliant wood packaging materials must be isolated from other domestic wood commodities, materials that has already undergone processing and adjacent forested lands by no less than 30 meters.
- Non-compliance report shall be prepared by the PQO to be submitted immediately to the NPPO of the country of origin, copy furnished the PQS and importer

With approved marking but with live quarantine pest found

- Commodity should be subject to treatment at once if possible, if not, return to sender/country of origin at the exporter's/ importer's expense.
- Non-compliance report shall be prepared by the PQO to be submitted immediately to the NPPO of the country of origin, copy furnished the PQS and importer **Suggest there be an option for destruction. The U.S. will allow for destruction of the wood packaging if quarantine pest is found.**
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**For Exporting Countries Not Yet Implementing ISPM 15**

For those countries who still has no system of marking WPM, they shall be given until January 2005 to comply with the necessary marking.

In lieu of the approved markings, all shipments should be accompanied by Phytosanitary Certificate stating that the prescribed treatment is carried out at the country of origin.

For Non-compliance, please refer to the provisions under IMPORT.

Since APHIS presently has an official program in place for both heat treatment and fumigation I do not see that the Jan 2005 compliance date applies to the U.S. However, the U.S. should be afforded a reasonable phase in period in order to allow for U.S. exporters to procure compliant stock.

Also, APHIS will not issue phytosanitary certificates for wood packaging used in the transport of commodities. The requirement for a phytosanitary certificate in lieu of approved markings is not compliant with the standard. The Philippines should be requested to accept the existing requirements of wood packaging on import and allow for a reasonable phase in period (one year?) before enforcing compliance of the regulation in line with ISPM15.