



Appalachian Hardwood Center

Phytosanitation of Wood Packaging Material Newsletter



*A Cooperative Effort of the West Virginia University Appalachian Hardwood Center
and the US Forest Service Wood Education & Resource Center*

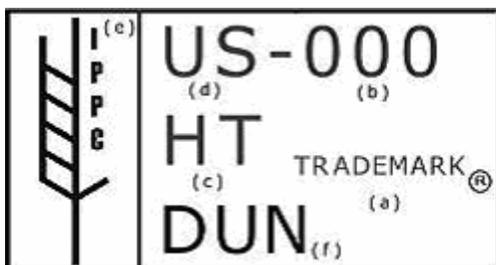
DUNNAGE

ISPM-15 defines dunnage as “Wood packaging material (WPM) used to secure or support a commodity but which does not remain associated with the commodity.”

ISPM-15 further states that “Ideally, dunnage should also be marked in accordance with Annex II of this standard as having been subjected to an approved measure. If not, it requires special consideration and should, as a minimum, be made from bark-free wood that is free from pests and signs of live pests. Otherwise it should be refused entry or immediately disposed of in an authorized manner.” Annex II refers to the proper marking for approved measures, namely heat treatment and methyl bromide fumigation.

Current handling of dunnage is a direct result of requirements imposed by several countries. It is highly recommended that shippers utilizing dunnage should adhere to the following requirements for all international destinations in order to avoid delayed and/or rejected shipments.

Dunnage must be treated with one of the acceptable treatments, heat or methyl bromide fumigation, and marked with the appropriate IPPC (International Plant Protection Convention) symbol. Because the basic heat treatment (HT) and methyl bromide (MB) WPM stamps are intended only for final products (e.g., pallets, skids, crates, etc.) they cannot be used for dunnage. Instead, “HT/DUN” and “MB/DUN” are the accepted markings for dunnage. The following example illustrates the appropriate marking for heat-treated dunnage:



Where:

- Trademark - the identifying symbol, logo, or name of the accredited agency
- Facility Identification - product manufacturer name, brand or assigned facility number
- Heat Treatment Mark
- Country Code - the two letter ISO country abbreviation
- Approved International symbol for compliant wood packaging material
- Indication of use for dunnage (may be spelled out fully)

Additionally, pieces intended for use as dunnage must be marked every two feet, so that any cutting of the longer piece into shorter pieces will ensure that the mark is present on each of the shorter pieces. In the case of dunnage shorter than 2 feet, each piece must still have the mark present.

Dunnage is almost exclusively being treated with heat. For those companies heat-treating both final product and dunnage, they will need to maintain two separate stamps from their inspection agency. Of course, this also means maintaining records for both dunnage and final product activities.

DEBARKING

Debarking is defined in ISPM-15 as the removal of bark from round wood (debarking does not necessarily make the wood bark-free). The European Union (EU) has been at the forefront of the debarking requirement for WPM. A number of World Trade Organization (WTO) members have questioned the scientific justification of the EU’s decision, making for a contentious situation.

The IPPC, through ISPM-15, allows member countries to impose additional requirements, such as debarking, only if these requirements are “technically justified.” Within the IPPC process, a measure is deemed to be “technically justified” when it is adopted on the basis of conclusions reached after an appropriate risk analysis, or after a comparable examination and evaluation of available scientific information. To date, a formal technical justification process has not been completed and submitted to the IPPC.

The chronology of the EU debarking requirement is as follows. The EU began implementation and enforcement of ISPM-15 on March 1, 2005 with a debarking requirement for WPM, but postponed enforcing the debarking requirement to March 1, 2006. Prior to the March 1, 2006 deadline, the EU Standing Committee on Plant Health, on January 1, 2006 voted to delay implementation of the debarking requirement until January 1, 2009. The delay was published as Council Directive 2005/15/EC in Official Journal L 56. A progress review of the directive is expected to commence by September 2007. The intent of the delay is to allow the IPPC time to evaluate the merits of a debarking requirement.

METHYL BROMIDE

In April of 2005, the Standards Committee of the ICPM (Interim Commission on Phytosanitary Measures), under the advice of the of the Technical Panel on Forest Quarantine, decided to submit a proposed change to the Methyl Bromide (MB) Fumigation Schedule of ISPM-15 (Guidelines for Regulating Wood Packaging Material in International Trade) through the Fast Track Standard Setting Process.

The following proposed changes were considered necessary due to concerns about the efficacy of the MB fumigation schedule in Annex I of ISPM-15.

The current schedule is in the table below:

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

Currently the minimum temperature should not be less than 11°C and the minimum exposure time should be 16 hours.

The proposed revision is in the table below (with changes in red and underlined):

Temperature	Dosage g/m ³	Minimum concentration (g/m ³) at:			
		<u>2</u> hrs.	<u>4</u> hrs.	<u>12</u> hrs.	<u>24</u> hrs.
21°C or above	48	<u>36</u>	<u>31</u>	<u>28</u>	<u>24</u>
16°C or above	56	<u>42</u>	<u>36</u>	<u>32</u>	<u>28</u>
<u>10</u> °C or above	64	<u>48</u>	<u>42</u>	<u>36</u>	<u>32</u>

The minimum temperature should not be less than 10°C and the minimum exposure time should be 24 hours.

As part of the Fast Track Process, a proposed revision is subjected to a 100-day comment period. If no formal objections are received, the standard is included on the agenda of the next scheduled ICPM plenary session for adoption without discussion. If one or more formal objections are received during the comment period, the IPPC Secretariat tries to resolve the issue(s) with the country(ies) concerned, and if these issues are resolved without change to the draft text, the standard is submitted to the ICPM for adoption without discussion.

A number of comments were received on the proposed revision. These can generally be summarized as follows:

- Several respondents wanted assurances that WPM treated under the existing fumigation protocol would not need to be re-treated if the proposed protocol is adopted. (Bolivia, Brazil, Chile, Paraguay, Uruguay)
- Respondents were in favor of the proposed protocol with respect to providing more protection against the pinewood nematode. (Bolivia, Brazil, Chile, Paraguay, Uruguay)
- Some respondents wanted the number of monitoring intervals reduced. (Indonesia, Malaysia, Nepal, Japan)
- There was interest in providing supporting text to describe how to use the table. (Indonesia, Malaysia, Nepal, Japan)
- Respondents were concerned that it is difficult to achieve the proposed gas concentrations at the end of 24-hour treatment, particularly if fumigation is carried out under a tarpaulin sheet (which is common in many countries) even though adequate safeguards have been put in place to ensure gas tightness of the enclosure. (Indonesia, Malaysia, Nepal, Australia)
- One country proposed reduced minimum concentrations at each time interval. (Thailand)
- One country argued against lowering the temperature from 11°C to 10°C at the lowest temperature range. (Canada)
- One country argued that effective control of Asian Longhorned Beetle larvae is only achieved at dosage rates of 80g/m³ (or above) at greater than 20°C for 24 hours. (Australia)
- One country suggests that the size, state (e.g., green wood), and type (e.g., softwood or hardwood) of the timber needs to be addressed. (Australia)

The process appears to currently be in the stage of resolving the issues put forth by the countries that responded during the comment period.

Country Updates

HONDURAS

According to USDA-APHIS, Honduras has apparently adopted ISPM-15 requirements for wood packaging. Based on a translated document that outlines the Honduran requirements, the following specifics appear to constitute the basics of their program.

- All WPM must exhibit the IPPC mark.
- The fact that WPM exhibits the IPPC mark, does not exempt it from inspection by official personnel carried out in conformity to the Manual of Quarantine Procedures.
- WPM not exhibiting the IPPC mark will be subject to the following actions, with all associated costs being borne by the importer:
 - a) Treat the unmarked WPM at the port of entry.
 - b) Replace the non-compliant WPM with national (Honduran) packaging or other packaging that fulfills the phytosanitary measures established in the Honduran regulations. Importers also have the choice of substituting non-regulated material for the non-compliant WPM.
 - c) Re-export the non-compliant WPM to the exporting country.
 - d) To return the entire shipment if none of the above measures can be applied.
- WPM exhibiting the proper IPPC mark, but with evidence of live pests, will be subject to an order safeguarding the affected WPM.

At this time, no official notifications by Honduras to the WTO (World Trade Organization) have been publicized, which is the reason for describing this announcement as an "apparent" adoption of ISPM-15.

JAPAN

Japan has decided to initiate a process that will lead to implementation of ISPM-15. In February 2006 a series of explanatory meetings were held and a comment period was put in place.

During the period of March thru June 2006 public hearings will be held, a formal announcement of quarantine measures will be made, information will be provided to the WTO/SPM (Sanitary and Phytosanitary Measures) Committee, and finally information will be posted to the IPPC website.

The intent is to implement the ISPM-15 guidelines in 2006, but a 6 month grace period will be in effect following publication of the final rule.

At this time quarantine measures will be handled somewhat differently, depending on the type of port.

Designated Ports

- Inspectors will check for WPM treatment marks and/or treatment certificates on a random basis.
- If marks and/or certificates are satisfactory WPM will not be subject to plant quarantine.
- If the marks and/or certificates are not satisfactory, then the following protocol will be followed. A visual inspection will be conducted. If no pests are found, the WPM will be allowed to pass. If pests are found, the WPM will need to be treated or destroyed.

At Other Ports

- Imports are permitted to enter Japan only if they have satisfactory treatment marks and/or certificates for the WPM. No other option is available.

NEW ZEALAND

A recent email communication with a representative of New Zealand's Ministry of Agriculture and Forestry (MAF) indicates that New Zealand is in the process of revising their WPM regulations. A draft of the Import Health Standard was available for public comment through the end of February 2006. By all indications, the revised standard is due to be issued on May 1, 2006. A copy of the draft can be found at the following website and scrolling down to Forest Biosecurity:

<http://www.biosecurity.govt.nz/strategy-and-consultation/consultation/ihs>.

A review of the draft standard would indicate that New Zealand is generally following the ISPM-15 guidelines. Deviations from ISPM-15 include a bark free requirement, a 24-hour methyl bromide fumigation schedule (see page 2) and the option to use other New Zealand approved treatments. These other treatments include fumigation with phosphine and chemical preservation (to full sapwood penetration) with boron compounds, copper azole, CCA, propiconazole and tebuconazole, or copper + didecyldimethyl ammonium chloride. These other treatments must be accompanied by a phytosanitary certificate with the treatment detailed in the Treatment Section or a National Plant Protection Organization (NPPO)-endorsed treatment certificate.

MAF will risk profile all consignments and select a subset for assessment on arrival in New Zealand. The subset will be selected using historical information of countries, commodities, importers or suppliers that have been associated with high risk wood packaging material. A number of consignments will also be selected and held at random. A Quarantine Officer will assess whether the consignment will be inspected or released.