

Implementation of ISPM 15 in the NAPPO Region

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Quality Assurance

Plan – phytosanitary policy

Do – producer's ongoing processes

Check – auditing by NPPO or authorized parties

Act – correct errors



Quality Assurance Systems

NPPOs establish specific standards to which facilities must comply

Phytosanitary strategies applied within entire production process

Quality Assurance Systems

Facilities must have written procedures on behaviour = responsibilities of individuals

- *Monitoring*
- *Deviation = set practices*
- *Verification procedures*
- *Documents to show actions*

Auditing verifies consistency of production/continuous improvement

Role of the NPPO in the Phytosanitary Quality System

*Establishing the phytosanitary
standard*

Auditing the accredited party

- *Failure in the accredited individual*
- *Failure of the system*

Continuous improvement

Role of Industry in the Phytosanitary Quality System

*Developing & implementing
compliant procedures & practices*

*Measuring the systems operation in
the facility*

*Correcting failure & continuous
improvement*

Components of a Phytosanitary Quality System

Procedures for pest management:

- *Inspection/testing /validation of:*
 - *Inputs,*
 - *Production areas/processes,*
 - *Outputs*
- *Pest detection and control systems*

Components of a

Phytosanitary Quality System

Sufficient and competent staff

*Records verifying consistent
maintenance of the quality system*

NAPPO Production

*420 H.T. facilities &
350 W.P. facilities*

*3200 H.T. facilities
& 3200 W.P.
facilities*

*113 W.P.
facilities*



Overview of NAPPPO Export Systems

Registered facilities operate under quality/certification system

- *Use and tracking of only approved heat treated or fumigated wood*
- *Controlled application of certification stamp*
- *Inventory control of treated vs. untreated products*

Overview of U.S. System

Process based system

*APHIS MOU with the American Lumber
Standard Committee (ALSC)*

*ALSC implements a quality control
program for the labeling of heat
treated WPM.*

WPM Program

Integration of two programs

*Lumber program oversees the
control of HT lumber*

*Wood Packaging Material Program
production of heat treated WPM*

Overview of U.S. HT System for Lumber and WPM

*PS 20 American Softwood
Lumber Standard lumber
standard includes conditions
for HT*

*ALSC establishes specific
policies and procedures*

Overview of U.S. HT System for Lumber and WPM

*ALSC accredits agencies to
oversee production of HT
lumber/labelling of lumber or WPM*

*HT requirements for lumber
program are identical to that of HT
WPM program*

Audit

Accredited agencies verify that standards

- *Heating chambers*
- *Thermocouples and/or*
- *Schedule sufficient to prescribed standards have been met*

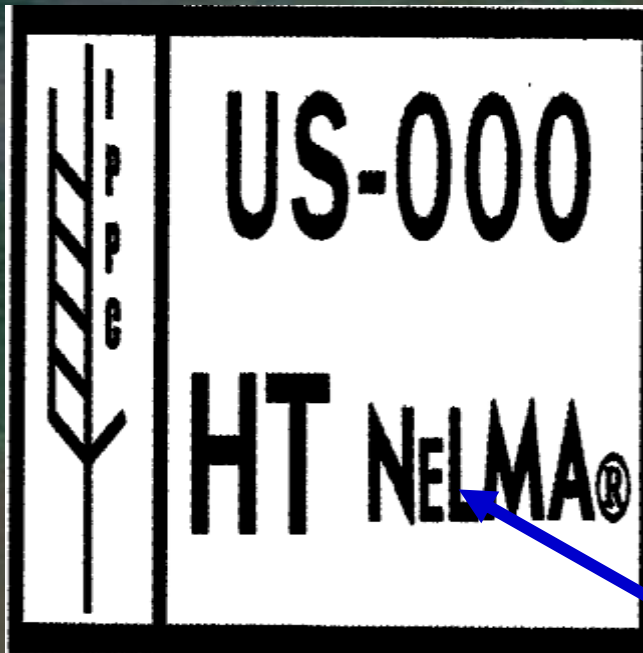
Audit

Perform a minimum of 12 unannounced inspections per year at each producer under the HT lumber program and the WPM program

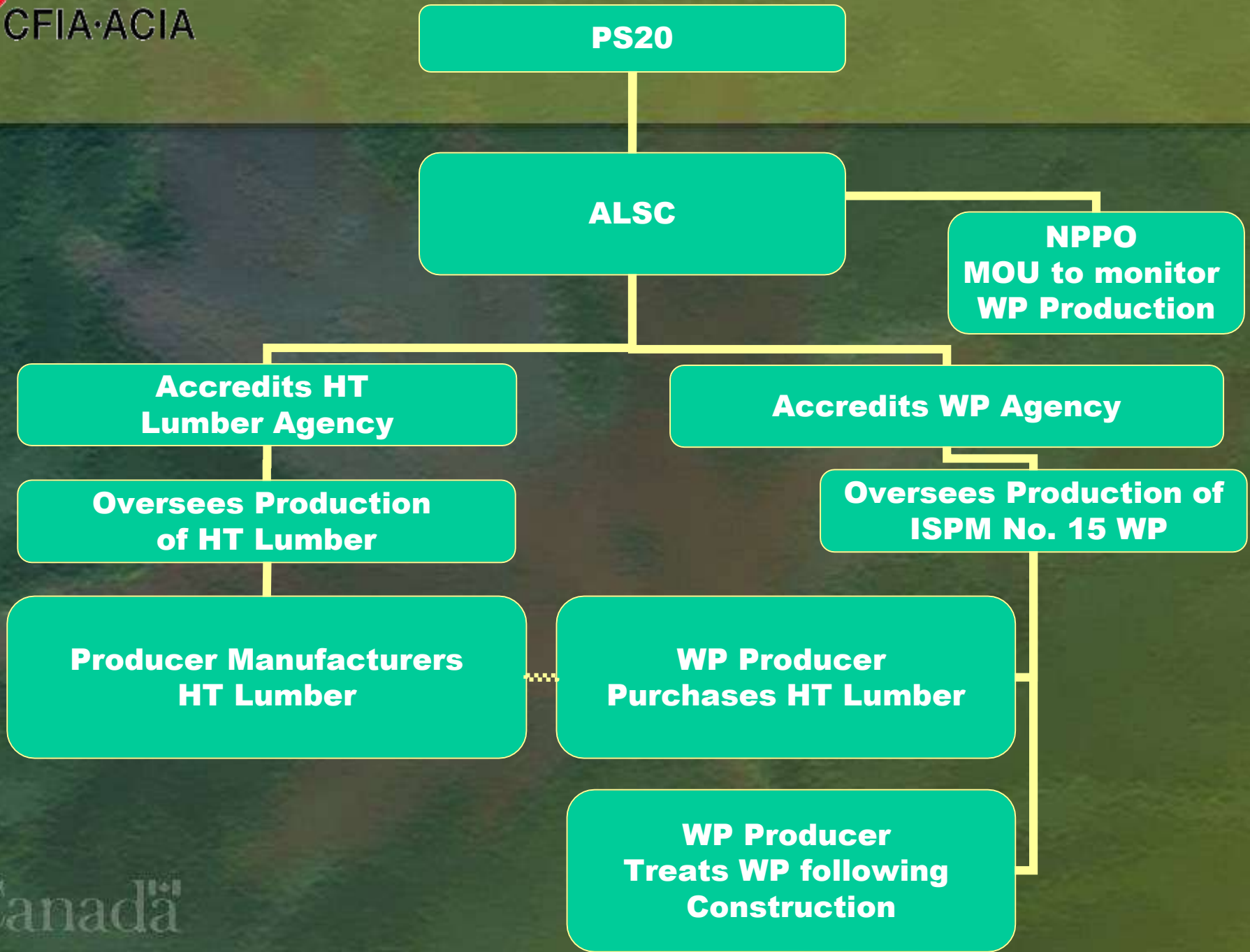
Agencies can/do withdraw labeling privileges from producers for non-compliance

Audit

*ALSC audits each agency to
determine compliance to the
established auditing requirements*



Trademark



U.S. W.P. Production

Certified W.P. compliant when:

- *Produced from HT grade marked lumber*
- *Constructed from non-heat treated lumber which once in W.P. form is heat treated in an approved chamber*

Allows producer to apply ISPM 15 compliant mark

Overview of Canadian System

Performance based

Several regulatory documents specify requirement for facilities/auditors

Administrative and legal requirements

- *Application, management commitment to compliance, etc.*

Operate under a Quality Plan

- *Heat treatment processes*
- *W.P. production*

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Canadian Food
Inspection Agency

Agence canadienne
d'inspection des aliments

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D-03-02

EFFECTIVE DATE
November 28, 2005
(2nd Revision)

Title: **Canadian Heat Treated Wood Products Certification Program (CHTWPCP)**

File

SUBJECT:

The Canadian *Plant Protection Act and Regulations* require that exports from Canada meet the phytosanitary requirements of the importing country. This policy directive outlines the conditions for the export of wood products by facilities registered under the *Canadian Heat Treated Wood Products Certification Program (CHTWPCP)*, which are required to meet the heat treatment requirements of foreign countries. Facilities participating in Canadian Heat Treated Wood Products Certification Program must operate under the provisions of *The Quality System*

[*www.inspection.gc.ca*](http://www.inspection.gc.ca)

4.1 Mandatory General Heat Treatment Chamber Operating Conditions

To use a heat treatment option the heat treatment chamber and facility must meet both the general conditions prescribed below along with the specific heat treatment requirements specified with each option.

4.1.1 The quality manual must identify that adequate air flow occurs throughout all zones of the chamber. An air flow minimum of 0.5 meters/second (100 feet/minute), (measured on the air exit side of the chamber of the load) is required. A zone is an area of 5 m long by 2.5 m high.

4.1.2 Lumber must be stacked on stickers of no less than 9.5 mm (3/8 inch) in thickness and in a manner to provide adequate air flow. Wood packaging or other wood products may be piled in a manner to provide good air circulation through and over all wide surfaces of individual boards.

4.1.3 All equipment must be in proper working conditions and the quality manual must specify the practices that are undertaken by the facility to ensure the normal operation of all equipment including heat sensors.

4.1.4 Dry and wet bulb measuring system must accurately measure the temperature within **$\pm 2.5^{\circ}\text{C}$ (4.5°F)**. The verification of the measuring system will be required on an annual basis. This requirement may be removed where the temperature exceeds the requirement for option A-B-D-E-F by at least 5°C and by at least 10°C for option C.

4.1.5 To ensure that facilities are prepared to deal with non-conforming equipment, the facility must specify procedures for dealing with failure or deficiencies in equipment operation including heat sensors, fans, etc.

4.1.6 If a facility is not in operation for a period of 6 months or longer, the facility must specify steps used in ensuring that the equipment is in normal operating condition before beginning treatments.

Canadian W.P. Production

Produced from CFIA certified wood

- *KD or HT (56°C/30 min.)*
- *No MBr. treated wood used in Canadian Program*

Recycled from certified W.P. and/or certified wood



Canadian Requirements

Treatment schedules must be developed or equivalent to generic process

Monitor and record of treatment processes

Monitoring/testing of equipment

Records and documentation

Heat Treatment



Canadian Requirements

Segregation (untreated/treated)

*Actions to deal with non-
conforming/non-compliant products*

Training/training records

Source of treated wood

Quality System



Process Control



Overview of Mexican System

Prescriptive requirements

Facility must comply with minimum treatment standards

NOM-144-SEMARNAT-2003

SEMARNAT inspects facilities and verifies treatment and traceability compliance

Mexican Standards for W.P.

SEMARNAT verifies facility production of H.T. through direct testing

- *Specific requirements for heat chambers (air circulation, measurement of temperatures, moisture control, etc.)*

Most facilities produce both H.T. and W.P.

Requirements to maintain records attesting to ongoing production using H.T. wood.

Controlling Wood Packaging Imports

Canada adopted in January 2004

US adopted in September 2004

Mexico in January 2005

☐ ISPM No. 15

HT or MBr

NPPO oversight

Slight technical distinctions

Controlling Wood Packaging Imports

Staged Enforcement Strategy

July 5 2006 - hard enforcement of non-compliant shipments



Inspection Methodology

Review of manifested goods

Targetting of high risk commodities (eg. granite blocks, tile, steel, heavy equipment...)

Instructions to border services (Customs, etc.)

High risk material inspection (re-directed)

Breakdown inspections carried out at inspection stations

Canadian Example: Sealed Container is Re-directed for Inspection



Gas Testing



Material is Offloaded for Inspection



Inspection



Inspection



Inspection



Inspection of Port Dunnage



Education





Canadian Food Inspection Agency



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CFIA-ACIA

Wood Imported to Canada is Strictly Regulated

Movement of crating, dunnage and any wood that is not kiln dried or heat treated, imported from countries other than the United States is only permitted when authorized by the Canadian Food Inspection Agency.

**Unauthorized movement
Subject to penalty**

Le bois importé au Canada est strictement réglementé

Le mouvement de caisses, de pièces d'arrimage et autres matériaux en bois qui n'ont pas été séchés au séchoir ou soumis à un traitement thermique en provenance de pays autres que les États-Unis est permis seulement lorsqu'autorisé par L'Agence canadienne d'inspection des aliments.

Tout mouvement non-autorisé sera passible de sanctions

Canada