



Forestry Commission

Plant Health Leaflet No 12

December 2002 (rev)

The UK Wood Packaging Material Marking Programme

This leaflet sets out the arrangements for the UK Wood Packaging Material Marking Programme.

Under the Programme, registered manufacturers, repairers, recyclers and others involved in the wood packaging material sector are approved to apply a mark to their product attesting that it meets prescribed treatment requirements assuring phytosanitary (plant health) security.

The Programme is based on ISPM 15 "Guidelines for regulating wood packaging material in international trade" adopted by the Interim Commission for Phytosanitary Measures and published by the Food and Agricultural Organization of the United Nations in June 2002.





Plant Health Controls

The UK Wood Packaging Material Marking Programme

The Programme has been set up in partnership between the Forestry Commission, the Forest Service of the Department of Agriculture and Rural Development for Northern Ireland and the Timber Packaging and Pallet Confederation (TIMCON). Under agreed arrangements, the Programme will be administered by TIMCON.

Introduction

Plant Health Organisations around the world have long since recognised the risk posed by movements of wooden packaging material – especially the lower grade material that is used, often as dunnage, to transport some types of goods.

Recent incidents involving new pest outbreaks have prompted the international community to promote the development of an international standard to address this problem.

International standards for phytosanitary measures (ISPMs) are prepared by the Secretariat of the International Plant Protection Convention as part of the United Nations Food and Agriculture Organization's global programme of policy and technical assistance in plant quarantine.

In March 2002, The Interim Commission on Phytosanitary Measures endorsed ISPM15 "Guidelines for regulating wood packaging material in international trade".

The UK Wood Packaging Material Marking Programme is based on the guidelines set out in ISPM 15 and, while it is currently a voluntary programme, it will become mandatory when the ISPM is implemented by the European Community, possibly in July 2003. Participants in the programme agree, however, to be bound by its rules and may face suspension from the Programme in the event that they breach its requirements.

NB: copies of ISPM15 can be obtained from the Secretariat of the International Plant Protection Convention, Food and Agriculture Organization of the United Nations, Viale delle Terme di Caracalla, 00100 Rome, Italy. Alternatively, it can be viewed on:

www.ippc.int/servlet/BinaryDownloaderServlet?filename=1031241811859_ispm15e.pdf&refID=16259

How do existing rules affect pallet and packaging manufacturers, repairers and recyclers operating in the United Kingdom?

While ISPM15 has not yet been adopted in the EU there are, nevertheless, rules in place governing the import of wood packaging material from most countries, with enhanced requirements including treatment and marking for material originating in specific countries (e.g. Canada, China, Japan and the USA).

Wood packaging manufacturers in the UK who make or repair pallets, crates, boxes, cable drums and similar articles supply these to a wide range of companies, many of which will be involved in exports. Subsequently, some of the packaging may therefore be used for goods shipped back to the UK. If this wood packaging material cannot be easily identified as having originated in the UK, it would have to be treated in the same way as the same material produced in the exporting country before being shipped back. Otherwise, on arrival, it will be liable to some form of remedial treatment in just the same way as non-compliant material originating in the exporting country. That is to say it may be destroyed, fumigated, heat treated or re-exported, at the importer's expense.

To address this problem, manufacturers, repairers and others involved in the wood packaging sector in the UK may apply to participate in the UK Wood Packaging Material Marking Programme. Once registered, and having been successfully assessed as being able and willing to comply with the requirements of the Programme, participants will be given approval to mark their product with a standardised mark incorporating a unique code identifying them and also each article as being of UK manufacture and meeting certain prescribed phytosanitary (plant health) requirements. Other Member States in the European Community, and some third countries, have similar arrangements and each will recognise the other's marks.

Other countries also have their own rules governing imports of wood packaging material and many are expected to implement ISPM15 in the near future. This Programme will enable suppliers of wood packaging material to supply products that will meet these new demands without any interference in our ability to trade with our overseas customers.

What does the Mark Look Like?

The standard mark is a box containing the following information (a sample mark appears at the end of this leaflet):

- The two-character ISO country code **“GB”** followed by a dash;
- followed by either **“FC”** or **“FS”** (for Great Britain or Northern Ireland, as appropriate) and a four-digit producer code (all zeros to be shown);
- The appropriate treatment code **“DB-HT”** (debarked and heat treated) or **“DB-MB”** (debarked and fumigated with Methyl bromide).
- The Forestry Commission’s ‘two-tree’ logo (Crown Copyright reserved).
- The standardised ISPM15 Wood Packaging Material compliance mark (to be confirmed).

The mark must be placed on each article, preferably twice on opposite vertical surfaces, but at least once, where it is not likely to be obscured by the goods when packed.

It must be of sufficient size so as to be easily legible.

It must be permanent. The use of tags is not permitted, unless it is not possible for them to be removed without breaking.

It may be in any colour, but the use of red or orange is not recommended as these colours are reserved for dangerous and hazardous cargoes.

Other information may also be included provided that it is not confusing, deceptive or misleading. Examples of permitted additional information include date of manufacture, batch number or company name or logo.

NB: where the wood packaging material includes components made from processed wood, these need not be subject to any additional treatment. Thus, for a crate made with processed wood components and solid wood which has been debarked and heat treated, the mark may include the letters “DB-HT”.



How do I register in the Programme?

Registration is by simple application and the declaration of an understanding of and an ability to meet the Programme's requirements with immediate effect. This will be verified by a compliance assessment that will need to be carried out before the applicant is given approval to use the mark. This will be in the form of a certificate incorporating the name of the company and the unique registration number to be incorporated in the official mark or stamp to be used by them. It will also confer authority to incorporate the logo of the Forestry Commission in the mark while the registration remains valid.

NB: use of the Forestry Commission logo for any purpose other than by Programme participants in the mark applied to compliant wood packaging material is a breach of Crown copyright and may lead to prosecution.

The Compliance Assessment will be carried out by an independent inspection agency approved for the purpose. Details of recognised agencies will be supplied at the time of application and it will be for the applicant to decide which agency to use and to arrange payment of assessment fees to the agency in accordance with their terms and conditions. The assessment will involve a review of the following areas:

DESIGNATED PERSON

Each applicant must, at the time of application, designate a person who is technically experienced in the processes employed in the production of the wood packaging material produced and stored on the premises. The Designated Person will liaise with the assessor and ensure that access is given to him at all reasonable times, in particular to inspect and to take any necessary samples, to examine the records of wood which has been purchased for packaging material production and any other related documents. Additionally the Designated Person must co-operate with the assessor in accordance with any other reasonable request he makes for the purpose of establishing whether the Programme's requirements are being complied with.

THE ASSESSMENT

The assessment will review the procedures established by the company and the system for recording details of material purchased and of products to be produced and identified with the officially recognised mark. All relevant records must be retained for a minimum period of 1 year. The assessor will therefore review:

- the sources and types of wood material used e.g. imported or home-grown; treated or untreated;
- treatment methods applied at the premises (e.g. heat treatment or fumigation) and the volume of timber treated, capacity of treatment facilities etc;



- uses of the packaging material produced e.g. for domestic, EU or third country exports;
- storage areas used to segregate materials intended for producing marked packaging (i.e. for third country exports) and other, unmarked, material;
- records of raw materials purchased and packaging material produced;
- the Designated Person's knowledge of the production operations, the Programme requirements and the relevant plant health regulations. In particular this will include his understanding of the following terms and processes;
 - debarked wood
 - heat treatment
 - fumigation with Methyl bromide
 - infestation
 - processed wood
 - signs of live pests

NB: *these terms are all described in the **Glossary** section of this booklet.*

The assessor will record the result of the assessment in a standard format and this will be discussed with the Designated Person before the assessor leaves. In addition, the result will be confirmed in writing within 5 days of the assessment.

NEGATIVE ASSESSMENT RESULTS

In the event of a negative assessment the company may elect to seek re-assessment at any time within three months of the original assessment. Failure to do so within this period will result in any later application being subject to a further payment of the registration fee in full.

QUALIFIED APPROVAL

In the event that the assessment is not wholly satisfactory, or cannot be completed because, for example, it is not possible to assess the finished product, and no significant shortcomings have been identified that would lead to an immediate refusal of approval to use the mark, the company will be given a 'qualified approval' only. In this event, the company must apply for a re-assessment when it considers that it has rectified the situation, or that sufficient product has been manufactured and is available for inspection so that the assessment can be completed.

The company must make application for re-assessment within three months of the first assessment. The re-assessment results must be positive if the company is to obtain a full registered status. Failure to apply for a re-assessment within the time period will result in the automatic removal from the Programme and immediate withdrawal of approval to use the mark.

The Timber Packaging and Pallet Confederation (TIMCON) will review the results of the assessment and in the case of a negative result inform the company of further action.

ONGOING ASSESSMENTS

Each participant in the Programme will be subject to re-assessment at six-monthly intervals. Two month's notice of when this is due will be provided to participants. The objective will be to confirm that all marked wood packaging material produced and despatched from the premises fully meets the requirements of the Programme. For companies accredited under ISO 9000 or other similar procedures, and where the agency carrying out these inspections is also approved under the Wood Packaging Material Programme, it will be possible to combine the two procedures.

Official Monitoring

In order to ensure that assessments are being carried out properly and consistently, Plant Health Inspectors from the Forestry Commission or the Forest Service in Northern Ireland will, from time to time, carry out their own assessments. These will generally take place immediately following the assessment carried out by the independent agency and will be arranged directly with the Programme participant at a mutually convenient time. There will be no charge made for this visit and every effort will be made to keep any inconvenience to a minimum. Each participant in the Programme will be obliged to co-operate with our inspector and to make all records and facilities available for inspection, as required.

What does it cost to participate in the Programme?

The cost of registration is £400 plus VAT. This fee is payable at the time of application and should be remitted to TIMCON together with the application form. Maximum fees for assessment visits are set by the independent inspection agencies and are ratified by the Advisory Council that oversees the running of the Programme. Applicants are responsible for paying these fees direct to the agency of their choice.

The fee payable to the inspection agency for all assessment visits, other than the first visit following application to register, will include an amount, currently £120 plus VAT, which will be remitted to TIMCON by the inspection agency to cover the ongoing administration costs of TIMCON and the Forestry Commission.

Infringements and Abuses

The Forestry Commission or the Forest Service, at their own expense, will be responsible for the action to be taken in the case of abuse or unauthorised use of the Wood Packaging Material marks. Part of the mark is the official logo of the Forestry Commission which is covered by Crown Copyright restrictions. This means that it can only be used with our specific authority, given in writing. This authority will only be given for the use of the logo when applied to compliant wood packaging material. It must not be used for any other purpose such as advertising or on company stationery. It will, however, be acceptable for approved participants to make reference to the fact that they are approved to mark and supply wood packaging material and to quote their registration number should they wish to do so.

Penalties for Abuse

The Forestry Commission and the Forest Service have the power to suspend the authority to apply the mark to wood packaging material where they are satisfied that the conditions for the use of the mark have not been, or are not being complied with. Suspension will remain in force until such times as the Forestry Commission or the Forest Service, as appropriate, is satisfied that the participant will be able to comply in the future. This will require an application for renewal of registration and additional assessment, at the participant's expense and at the same rate of fee as for a new application for registration and associated initial assessment.

In cases where a non-participant is found to have been using the mark, this will be referred to the relevant Prosecution Service for formal investigation and, where deemed appropriate, legal proceedings will be initiated against alleged offenders.

Glossary of Terms

Debarked wood – is defined as wood produced from logs which has had the bark removed.

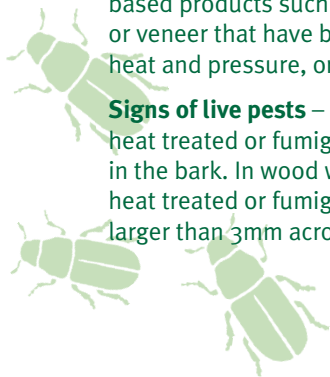
Heat Treatment – is defined as the process in which a commodity is heated until it reaches a minimum temperature for a minimum period of time according to an officially approved technical specification. For plant health purposes, this has been defined as a minimum temperature of 56°C, measured at the core of the wood, for at least 30 minutes.

Fumigation – treatment with a chemical agent that reaches the commodity wholly or primarily in a gaseous state. For plant health purposes, only fumigation with Methyl bromide is recognised as effective against all harmful organisms at all stages of development.

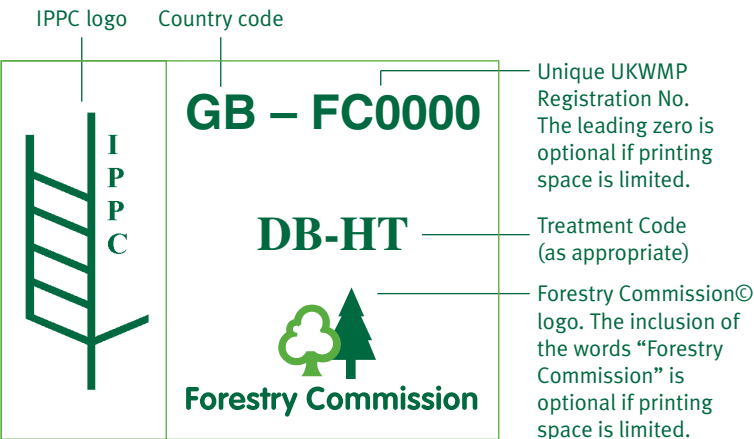
Infestation – presence in the wood of a living pest of the wood or of the species of tree from which it was produced.

Processed wood packaging – wood packaging made wholly of wood-based products such as plywood, particle board, oriented strand board or veneer that have been created using a process involving glue, or heat and pressure, or a combination of these.

Signs of live pests – in wood with bark, other than wood that has been heat treated or fumigated and appropriately marked, insect bore holes in the bark. In wood without bark, other than wood which has been heat treated or fumigated and appropriately marked, insect bore holes larger than 3mm across.



Sample mark



Other leaflets in the Plant Health series

- PHL1 Plant Health Import and Export Controls – Wood and Bark
- PHL2 Import Inspection Fees for Wood, Wood Products and Bark
- PHL5 Health and Safety at Work – A guide for Inspectors carrying out Plant Health Service work
- PHL7 Plant Health and the Single Market
- PHL8 Plant Health and the Single Market – Guidance on EC Plant Health controls for registered forestry traders
- PHL9 *Dendroctonus Micans* – A guide for forest managers on control techniques
- PHL10 Plant Health Inspections – Minimum facilities at ports
- PHL11 Plant Health Controls – The use of dunnage in British ports



Forestry Commission

■ Further Information

For advice on the Wood Packaging Material Marking Programme, please contact:

The Secretary, UK Wood Packaging Material Marking Programme
TIMCON, 840 Melton Road, Thurmaston, Leicester LE4 8BN

Tel: 0116 264 0579 • Fax: 0116 264 0141 • Website: www.timcon.org

For advice on any aspect of plant health please contact your local Plant Health Regional Manager:

Scotland

Ian Brownlee
Tel: 0131 314 6480
Fax: 0131 314 6148
Mobile: 07831 159014
Email: ian.brownlee@forestry.gsi.gov.uk

North England & North Wales

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Tel/Fax: 01751 475655
Mobile: 07836 543234
Email: russell.collins@forestry.gsi.gov.uk

East England

Stephen Mears
Tel/Fax: 01507 328275
Mobile 07831 204324
Email: steve.mears@forestry.gsi.gov.uk

South England & South Wales

Mike Willingham
Tel/Fax: 01622 850768
Mobile: 07831 157692
Email: mike.willingham@forestry.gsi.gov.uk

Alternatively, advice can be sought from the Plant Health Service,
Forestry Commission, Silvan House, 231 Corstorphine Road, Edinburgh EH12 7AT
Tel: 0131 314 6414 • Fax: 0131 314 6148
E-mail: plant.health@forestry.gsi.gov.uk

For enquiries in Northern Ireland contact the Department of Agriculture and Rural
Development Forest Service, Dundonald House, Upper Newtownards Road,
Belfast BT4 3SB
Tel: 02890 524116 • Fax: 02890 524380

Information on Plant Health generally, as well as current items of interest, can be
viewed on our website at: www.forestry.gov.uk/planthealth

Plant Health Service

*Guarding the health of Britain's forests
and woodlands.*

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