

Q1 *How do I get approval to apply the ISPM15 mark to WPM?*

A1 Approval to use the ISPM15 mark can only be given by a National Plant Protection Organisation or an organisation officially audited and mandated by the NPPO.

Q2 *Is the ISPM15 mark protected and do I need to get permission to use it?*

A2 The IPPC part of the mark has been protected in a number of countries by the FAO and is available to be used by production and treatment facilities approved to apply the ISPM15 mark by their NPPO.

Q3 *Does the mark applied to treated WPM need to be identical to the model in ISPM15?*

A3 Ideally, the model in Annex II of ISPM15 should be followed but the main requirement is that the mark is to be permanent and legible. In some instances, technical or operational factors make it impossible to faithfully follow the format and style set out in Annex II. The mark must, however, contain the minimum information of

- IPPC symbol;
- ISO two letter country code followed by a unique number assigned by the NPPO to the producer of the WPM, who is responsible for ensuring appropriate wood is used and properly marked;
- treatment code according to Annex I of ISPM 15 (e.g. HT or MB).

The mark may contain other information so long as it is not confusing, misleading or deceptive.

Q4 *What size must the mark be?*

A4 There is no prescribed size.

The only requirement is that the mark must be permanent and legible.

Q5 *Must the mark be applied to every piece of wood in the treated article (e.g. pallet, box, cable drum etc)?*

A5 No: the mark need only be applied to the complete unit, preferably twice on opposing vertical faces, where it can easily be seen. On pallets, this could be on the inner faces of blocks because these are more visible to an inspector when looking inside a container or anywhere else where pallets are stacked.

Q8 *What kinds of treatment are allowed?*

A8 Currently, there are two approved measures that are recognised: heat treatment and fumigation by Methyl bromide, both in accordance with the specification set out in Annex I of ISPM15. Other treatments may be approved in future once scientific data on efficacy has been considered and an amendment to ISPM15 agreed by the ICPM.

Q14 . What are the target-pests of wood packaging material (WPM) ?

A14 The target pests are those listed in the table forming part of Annex I to ISPM15.

Q14(a) Is it possible to talk about pest free areas (e.g. for Asian longhorn beetle, Pine shoot beetle, Termites...etc)?

A14(a) With the exception of certain bilateral arrangements, provided for in section 3.3 of ISPM 15 (Other Measures), it is not possible to make reference to pest free areas. This is because, by its nature, WPM has a long service life and while it may be manufactured in a country where pests of quarantine concern are known not to occur, and all production in that country is comprised of wood originating in that country (no imported wood is used), it is probable that it will be repaired, remanufactured or re-cycled in other countries during its service life. Even if it is not to be repaired, remanufactured or recycled after the first use, it could not be re-used before being treated and marked in the country of first destination.

Q14(b) *What are the phytosanitary requirements to Import WPM from pest free areas?*

A14(b) Where bilateral arrangements are made under section 3.3 of ISPM 15 (other measures), NPPOs will need to agree the phytosanitary requirements to be met for WPM that has not been subject to one of the approved measures.

This may require the use of phytosanitary certificates and/or the marking of WPM in some other way so as to identify it as not having been treated under ISPM 15.

Q18 *Where an NPPO permits the use of phytosanitary certificates in place of marking in accordance with ISPM 15, how do companies that wish to re-use unmarked WPM ensure that it is eligible for such re-use?*

A18 The NPPO would need to make provision for the issue of a re-forwarding phytosanitary certificate in accordance with ISPM 7 (Export Certification System), having first established that the importing country is prepared to accept this. If the importing country has put in place requirements based on ISPM 15, the exporter would need to have the WPM treated by an approved measure and marked under the official programme of the NPPO. If neither of these options could be followed, the WPM cannot be re-used for export.

Q16 What about phosphine fumigation instead of Methyl bromide fumigation (because MB is prohibited in some countries)?

A16 Fumigation with fumigants other than Methyl bromide have not been proved effective against some pests, particularly Pine Wood Nematode, and may not be effective against some pests present at certain stages of development, particularly the egg stage. Alternatives to Methyl bromide, including phosphine, are identified in Annex III of ISPM 15 "Measures being considered for approval under this standard" but will only be approved once scientific data proving efficacy is made available. Where the use of methyl bromide is prohibited, the only alternative currently available is heat treatment. Where there are no facilities for heat treatment available locally, manufacturers of WPM will need to purchase heat treated wood from another source.

Q10 Is kiln-drying the same as heat treatment?

A10 No, they are separate processes. Kiln-drying is a process designed primarily to reduce the moisture content of the wood to below, typically, 20%. It uses artificial heat, but there is no minimum requirement for temperature and some kiln temperatures are too low to ensure that all pests present are killed. Heat treatment is a process relying on a minimum wood core temperature of 56 degrees Celsius being reached and maintained for at least 30 minutes. This specification has been proved to be effective at killing quarantine pests* at all life stages.

* i.e. the pests identified in Annex I of ISPM 15

Q9 *Are the approved measures permanent?*

A9 Both heat treatment and methyl bromide are considered permanent.

Neither will give 100% protection but they will practically eliminate the risk for most quarantine pests and will significantly reduce the risk from a number of other pests that may be found in WPM.

However, where the bark is not removed, there is a greater risk of post treatment infestation as many of the pests of quarantine concern depend on the presence of bark to lay eggs. This risk will, however, reduce in time as the wood naturally dries out.

Q13 *How long could WPM be protected against insect and fungi infestation once it is Heat treated or fumigated? (This was asked because in several countries the Agricultural product exporters store WPM for six to 12 months before use)*

A13 Both of the approved measures (heat treatment and fumigation with Methyl bromide) are recognized in ISPM 15 as being sufficient to permit the ongoing use of the treated and certified WPM indefinitely, provided that untreated wood is not added to the packaging. However, both treatments are only effective against pests present at the time of the treatment. Technically, treated wood is susceptible to infestation by some pests immediately treatment is concluded - especially if the wood has not been debarked. If, however, the moisture content of the wood falls below 20% moisture content, either naturally or artificially, then fungal growth will be inhibited and many pests will not be able to survive. In general, the risk of infestation following treatment is limited because WPM is often in service for long periods of time and, as the wood ages, it naturally loses viability as a host to most pests. Exceptions to this general rule are termites and certain drywood borers (Lyctidae).

Q11 *What is meant by repair, remanufacture, recycle and re-use?*

A11 The following definitions may be used:

"Recycle" - a process whereby a previously used article of wood packaging material is dismantled either partially or completely and the components used without further re-working in the manufacture of a new article of wood packaging material.

(NB: Recycling may include 'remanufacturing').

"Remanufacture" - a process whereby a previously used article of WPM is completely dismantled and the components used, either in their original form or after re-sawing, in the manufacture of another article of WPM. Remanufactured WPM may or may not incorporate new and previously unused components.

"Repair" - a process whereby a previously used article of WPM has one or more components removed and replaced with new and previously unused wood.

Q11.1 - Should repaired, remanufactured and re-cycled WPM be re-treated in addition to being re-certified and re-marked?

A11.1 - Yes: in order to establish chain of custody and maintain accountability, repaired, remanufactured and recycled WPM shall be subject to re-treatment. All previous ISPM15 markings shall be removed or obliterated and the product re-certified and re-marked by a person authorised under an official programme. This is also necessary to ensure that each article of WPM meets the requirement in Annex II that markings should be placed in a visible location, preferably on at least two sides of the article being certified.

Q7 Does WPM need to be re-treated and re-marked before being re-used?

A7 If no alterations are made to the unit of WPM, and it is simply being put back into service without any modifications or repairs, it does not need to be retreated and remarked.

Q6 What marks should be on repaired WPM which might have pieces of wood treated by different companies in different countries?

A6 WPM that is repaired, remanufactured or recycled must have all the original marks removed or obliterated and replaced by a single mark assigned by the NPPO to the facility carrying out the work. The facility shall be responsible for ensuring that appropriate wood is used.

Q23 Is it permitted to repair an ISPM 15 compliant pallet or other WPM product with untreated wood components for national use only?

A23 Yes, but the original mark must be obliterated so that it is not possible for the WPM to ever be used again in international trade. As this category of repairer is unlikely to be a member of a national ISPM 15 Programme, NPPOs should consider regulating this activity within their legislation so that it would be prohibited to put such a repaired product into circulation without first obliterating the ISPM 15 mark.

Q19 - What needs to be done with WPM that has been treated by an approved measure but which was produced before the adoption of ISPM 15 and introduction of the IPPC mark so that it may be accepted by importing countries?

A19 - All WPM has to be treated by an approved measure and have the appropriate mark applied by an officially authorised manufacturer or repairer operating within a NPPO Program. The mark can only be applied either at an approved facility where the treatment was applied or by another accredited party and based on documentary evidence that the wood supplied to him has been treated at another NPPO- authorised treatment facility, either in the same country or in another country with an official program. For 'old' WPM, if that evidence does not exist, it will need to be subjected to re-treatment and a mark applied in the normal way.

Q21 How should an operator attest WPM that is treated by an approved measure after loading into, for example, a container immediately prior to shipping?

A21 The preferred solution is to mark the WPM after treatment and before it is put into service. However, it may be possible to have in place an official procedure whereby either the container is unloaded after treatment and the WPM marked, or the WPM is marked by the operator immediately prior to loading and treatment. Special provisions shall be required to ensure the integrity of the consignment and the WPM throughout the process. If operational restrictions do not enable adequate provisions to be put in place then the exporting NPPO may consult with the importing NPPO to arrange acceptance of a phytosanitary certificate attesting treatment of unmarked WPM.

Q12 - Is any marking required for manufactured WPM such as plywood, particle board or veneer peeler cores?

A12 - There is no marking requirement for WPM comprised **entirely** of exempted wood-based products such as plywood, particle board, oriented strand board, veneer or material such as veneer peeler cores. However, if veneer peeler cores are altered such as by sawing or shaping so that they lose their visual identity, they will need to be regarded in the same way as non-manufactured wood and marked to show that they have been subject to an approved measure in accordance with ISPM 15.

Q20 Are new barrels manufactured for carrying wines and spirits or barrels previously used for this purpose covered by the definition of wood packaging material set out in ISPM15?

A20 Technically, a barrel is wood packaging material as it is a product used in carrying a commodity. However, the manufacturing process for barrels used in the wines and spirits industry is such that it presents no phytosanitary risk and it should be considered a processed product and regarded in the same way as, for example, veneer peeler cores and not regulated.

Q17 *Does dunnage remaining on board a marine vessel require to comply with ISPM 15?*

A17 As any pests that might be present on infested dunnage (or WPM, for that matter) may be attracted to migrate inland, all dunnage and WPM that presents a risk of introduction of harmful organisms should ideally be treated. However, whether a NPPO is able to make this a requirement will depend on the limits of its national law. It is suggested that, where possible, the same provisions should be applied in respect of dunnage and WPM that is present on other forms of transport and which is not intended to be removed.

Q22 *How can an NPPO properly identify consignments of commodities with associated WPM for inspection at the time of import?*

A22 Packaging declarations, issued by an exporter or a shipper, will be helpful and may be assessed by customs brokers or customs authorities or, if declared on shipping manifests, by port operators. NPPOs in collaboration with these parties may use this information, as well as entry clearance information obtained from Customs, to formulate risk-based inspection procedures to target consignments for phytosanitary inspection. Such procedures should facilitate the speedy throughput of cargo and ensure that inspections are carried out only where necessary. To remain effective, however, continual monitoring of results must be maintained.

New question: is it possible that fraudulent marks will be used?

Answer: Yes - in every situation where a mark is used to make a statement, it is possible that someone could have a fraudulent stamp made. This is not unique for WPM. It will be for the NPPO to ensure that there are adequate legal penalties when fraud is found, and that necessary inspections are made to help find them.

Verification of Heat Treatment Chambers and Authorisation of the use of the HT Mark

Use of Heat Treated Wood by a WPM Manufacturer or Repairer who does not have his own heat treatment facility

- Treated wood purchased in from a facility in the same country
- Treated wood purchased in from another country

Join the Discussion Board: Instructions can be found at

www.forestry-quarantine.org

or send an e-mail to

mailserv@mailserv.fao.org

leave the subject line blank and type this message in the text:

SUBSCRIBE ISPM-15-L

Then simply send

The End

Thank you for your attention