



The United Kingdom Wood Packaging Material Marking Programme

Requirements for regulating wood packaging material in international trade (ISPM15)





Forestry Commission

Plant Health Guide

The United Kingdom Wood Packaging Material Marking Programme

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Introduction

The risks of introducing and spreading tree pests through the transport of packaging material made of unprocessed wood is recognised internationally. Certain pests, including wood boring longhorn beetles from the family Cerambycidae, bark beetles from the family Scolytidae, and the pine wood nematode *Bursaphelenchus xylophilus*, are readily transported and spread via infested wood packaging material.

On 15 March 2002 the Interim Commission on Phytosanitary Measures* adopted an International Standard for a Phytosanitary Measure, *Guidelines for regulating wood packaging material in international trade* (ISPM15). Many of the UK's trading partners around the globe have now implemented landing regulations based on ISPM15. At present, wood packaging material (WPM) used to transport goods between EU member States (including Switzerland under special agreement) need not be ISPM15 compliant. However, to meet the landing requirements of the EU Plant Health Directive (Council Directive 2000/29/EC), all wood packaging material (except dunnage) entering the EU from non-member states (except Switzerland) must be either heat treated or fumigated with methyl bromide and be marked in compliance with ISPM15. Dunnage may either be treated and marked in the same way as other WPM or, until 31 December 2007, it is sufficient that it is bark-free, free of pests and signs of live pests.

For exports from the UK, the Forestry Commission (Great Britain) and Forest Service (Northern Ireland) have established a national wood packaging material marking programme in conjunction with the trade in to help manufacturers demonstrate compliance with ISPM15. The *United Kingdom wood packaging material marking programme* (UKWPMMP) regulates the manufacture, repair, recycling and re-manufacture of ISPM15 compliant WPM in the United Kingdom and is administered by the Timber Packaging and Pallet Confederation (TIMCON). The Programme was given statutory status on 6 November 2006, when the Plant Health (Wood Packaging Material Marking) Forestry Order 2006 came into force. Operation of the UKWPMMP is overseen by members of an Advisory Council consisting of representatives from the Forestry Commission (FC), Forest Service (FS), Timber Packaging and Pallet Confederation (TIMCON), National Association of Pallet Distributors (NAPD), United Kingdom Forest Products Association (UKFPA) and the British Pest Control Association (BPCA).

This guide sets out the obligations of manufacturers, repairers, recyclers and others involved in the wood packaging material sector under the *United Kingdom Wood Packaging Material Marking Programme*.

*Now the Commission on Phytosanitary Measures following implementation of the revised text of the International Plant Protection Convention on 2 October 2005.

The implications of ISPM15 for WPM manufacturers operating in the UK

The key points to note are:

- Many countries have implemented ISPM15 and anyone who uses WPM to transport their goods to these countries must ensure that it is treated and marked accordingly.
- If you want to apply an ISPM15 mark you must have an official certificate authorising you to do so.

Applying for a certificate

TIMCON administers the programme on behalf of the FC and FS. More information and an application form are available from the ISPM15 page at www.timcon.org.

On receipt of an acceptable application, you will be advised to arrange for an independent assessment agency recognised by the FC and the FS to formally assess your ability to carry out, in a proper manner, the approved measure(s) to which the application relates. Alternatively, where pre-treated wood is used, your systems to ensure proper marking of WPM manufactured by you, together with appropriate audit trails and records will be assessed. Information relating to the operational standards that the assessment agencies will be reviewing can be viewed on the TIMCON website at www.timcon.org.

When you apply for a certificate you must nominate a *Designated person*. This person must have full technical knowledge and experience of the WPM production methods specified in your application. He/she must be available during the assessment process and be able to facilitate access to material, production areas and equipment, and relevant records.

The assessment

The assessment will review the systems, including processes and records, pertaining to the manufacture, re-manufacture, repair, recycling, treatment and marking of WPM. It will include a review of:

- The sources and types of wood used, and reconciliation of volumes in and out and stock balances (receipts and sales).

- The treatment methods used at the premises, for example, the capacity of facilities and their ability to achieve the required technical standards.
- The available facilities for segregation of ISPM15-treated material from that which is not treated.
- The Designated person's knowledge of production operations, the Programme's requirements and Plant Health regulations. In particular his or her understanding of the following terms and processes:
 - ISPM15 marking requirements;
 - definition of WPM;
 - heat treatment;
 - fumigation with methyl bromide;
 - processed wood;
 - debarked and bark-free wood;
 - signs of live pests.

If the application is successful the FC will issue a certificate via TIMCON. The certificate is valid for six months. If the application is refused, and one or more measures are identified which, if taken, would enable a certificate to be issued, you may be invited to apply for reassessment. Please note that:

- The Plant Health (Wood Packaging Material Marking) (Forestry) Order 2006 imposes an obligation on manufacturers to ensure that they can demonstrate the integrity of their WPM supply chain (process, documents, products) from source of ISPM15 compliant wood to production and marking of the finished product.
- The Order specifies two options for producing ISPM15 compliant material: either heat treatment to a minimum of 56°C at the core for 30 minutes, or methyl bromide fumigation. (Please note that under the terms of the Montreal Protocol the use of methyl bromide is limited to certain quarantine and pre-shipment uses, and may eventually be phased out.)
- The Order also introduces a number of offences and associated penalties for unauthorised or improper use of an ISPM15 mark.

Where you are subject to ISO9000 Quality Management Standards audit, and your auditor is approved by us to perform WPM Programme assessments, it should be possible to combine the two.

Joining fees

To join the Programme you must pay a registration fee and an assessment fee. The registration fee of £400 must accompany your application and should be paid to TIMCON. An initial assessment will be carried out to ensure that you are able and willing to meet all of the requirements of the Programme. This assessment and ongoing six-monthly re-assessments (see Renewing a certificate on page 6), will be carried out by one of the independent agencies recognised for the purpose and listed on the TIMCON website. You will be responsible for arranging a time for your assessment with the agency of your choice and for payment of associated fees, negotiated with them by you.

Treatment options and marking requirements for WPM

All new/repaired/remanufactured/recycled wood packaging material, including dunnage, must be free of bark and shall be treated by one of the following:

- Heat treatment to a minimum of 56°C for 30 minutes measured at the core.
- Fumigation with methyl bromide in accordance with the specification in Table 1.

Table 1: Methyl bromide fumigation schedule (Annex 1 of ISPM15)

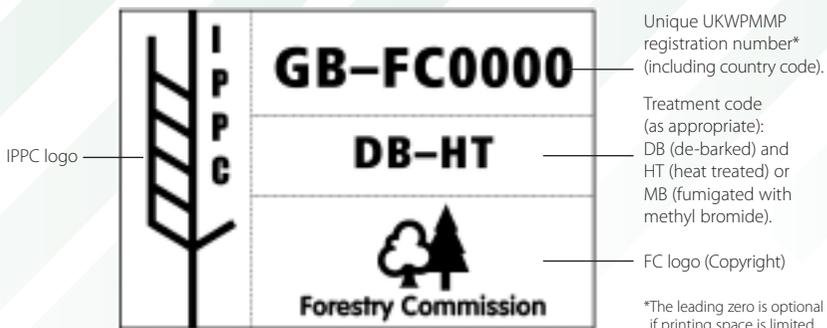
Temperature	Dosage (g m ⁻³)	Minimum concentration (g m ⁻³) at:			
		2 hours	4 hours	12 hours	24 hours
21°C or above	48	36	31	28	24
16°C or above	56	42	36	32	28
10°C or above	64	48	42	36	32

NB: minimum temperature should not be less than 10°C and the minimum exposure time should be 24 hours. Monitoring of concentrations shall be carried out at a minimum of 2, 4 and 24 hours.

An ISPM15 mark consists of three codes (country, producer and approved measure), and the IPPC and Forestry Commission* logos. An example of an ISPM15 mark is shown in Figure 1 opposite. More detailed information regarding the quality of marking can be found at: www.timcon.org.

*The Forestry Commission logo is protected by Crown Copyright and may only be used within the context of the Plant Health (Wood Packaging Material Marking) (Forestry) Order 2006.

Figure 1: An example of an ISPM15 mark.



How to mark articles of WPM:

- Each WPM article shall be marked on two opposite vertical surfaces.
- Marks shall be clearly visible when the article is in use.
- Marks shall be legible.
- Marks shall be permanent. The use of tags is not permitted, unless they are non-transferable (unable to be removed without being damaged).
- Marks 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.
- Branding and laser printing is more effective on rough sawn timber and composite pallet blocks and stencil and stamps are readily applied to smooth wooden surfaces.

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.

Processed wood and wood less than 6 mm in any dimension is, generally, exempt from control but may be made subject to landing requirements in some countries. Where wood packaging material includes components made from processed wood, these need not be subject to any additional treatment. Thus the mark on a crate made from both processed and non-manufactured wood components, which have been debarked and heat treated, may include the letters 'DB-HT'.

What happens if ISPM15 compliant WPM is repaired, recycled or re-manufactured?

In order to maintain chain of custody and accountability, repaired, recycled and re-manufactured ISPM15 compliant WPM must be subject to re-treatment and all previous ISPM15 marks must be removed or obliterated and the product re-marked by a person authorised under the UKWPMMP. In exceptional circumstances the FC may grant an exemption from re-treatment and re-marking. Companies may apply to the FC for exemption but full traceability and rigorous control procedures must be evident before any application will be considered. All such exemptions must be approved in writing.

What happens to imported material that does not comply with ISPM15 requirements?

Action taken is at the discretion of the Plant Protection Organisation of the importing country. Non-compliant material may be re-exported (with or without the goods being shipped with it), destroyed, treated, subjected to deep burial or processing, e.g. chipping (depending upon the policy of the country of import), generally at the importer's expense.

Other ISPM15-related questions and answers

In order to address many of the questions that have arisen and continue to arise regarding the global implementation of ISPM15, an international list-serve discussion forum has been set up. This forum is moderated by a member of the International Forestry Quarantine Research Group (IFQRG) sub-committee on ISPM15. Consensus on proposed answers to questions are sought through this email forum and are posted at www.forestry-quarantine.org/ISPM15 but they hold no official status.

Renewing a certificate

The holder of a certificate may apply for renewal no earlier than one month before its expiry. A reassessment will be carried out to confirm that all ISPM15 compliant WPM produced meets the requirements of the Programme. The administration fee for renewal of a certificate is £120 which is payable to TIMCON. As soon as TIMCON receive this fee and are notified of a successful re-assessment (which will be charged separately by the assessment agency) a new certificate will be issued to the person designated within your organisation.

Official monitoring

In order to ensure that assessments are being carried out properly and consistently, plant health inspectors from the FC or FS will audit assessment agencies. They will coordinate audits to coincide with the independent agency's assessment visit. You will not be charged for this official monitoring.

Powers of inspectors

To check whether marked WPM is being manufactured in compliance with the Programme, plant health inspectors have authority to enter, without a warrant, any premises they believe to be used for this purpose (other than premises used wholly as a private dwelling). An inspector may observe the manufacturing process, examine or test any equipment, examine or take samples of WPM, inspect and make copies of documents relating to the manufacture of WPM and take photographs as necessary.

An inspector may remove, or ask for the removal of, any ISPM15 marks, which he/she believes have been applied without a certificate or which do not otherwise meet the requirements of the Programme (e.g. are illegible).

Where an inspector has grounds for suspecting that a person has applied, or intends to apply a mark to WPM without a certificate, they may confiscate any equipment they believe to be capable of applying an ISPM15 mark. Any person from whom such equipment has been seized will have one month in which to lodge an appeal to the Forestry Commissioners before the equipment is destroyed. Where an appeal is lodged, the Forestry Commissioners shall either return the equipment if they are satisfied that there are good grounds for doing so, or shall apply to the Court for an order for its destruction.

Withdrawal of Certificates

Certificates may be withdrawn if it is believed that a manufacturer has not complied with the provisions in the Plant Health (Wood Packaging Material Marking) (Forestry) Order 2006. Any person from whom a certificate has been withdrawn will be notified of the reasons in writing and may apply for re-assessment within 3 months of the date on which the invitation to reapply was received by them.

Useful sources of information

Copies of ISPMs 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 they can be viewed at: www.ippc.int.

Statutory Instrument 2006 No. 2695 *The Plant Health (Wood Packaging Material Marking) (Forestry) Order 2006* can be viewed at www.opsi.gov.uk.

For information and advice on the UK Wood Packaging Material Marking Programme and details of all participant wood packaging manufacturers, contact:

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www.timcon.org (select the ISPM15 option)

For information and advice on plant health matters in Great Britain, visit: www.forestry.gov.uk/planthealth or contact one of the members of the Forestry Commission Plant Health team:

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E: grants.forestservice@dardni.gov.uk

Plant health publications

Plant health guides:

- **FCPH001** Importing wood, wood products and bark
- **FCPH002** Import inspection fees for wood, wood products and bark
- **FCPH003** Export certification
- **FCPH004** The United Kingdom Wood Packaging Material Marking Programme
- **FCPH007** Plant health and the single market
- **FCPH008** Plant health and the single market: guidance on EC plant health controls for registered forestry traders
- **FCPH009** *Dendroctonus micans*: a guide for forest managers on control techniques

Plant health notes:

- **FCPH110** Minimum facilities at ports
- **FCPH111** The use of dunnage in British ports

For information on all Forestry Commission publications, visit: www.forestry.gov.uk/publications
Digital (pdf) versions of many titles, including this one, are available to view and download.

Glossary

Bark free wood: wood from which all bark, excluding the vascular cambium, ingrown bark around knots and bark pockets between rings of annual growth, has been removed.

Debarked wood: wood produced from logs which have had the bark removed.

Dunnage: wood used, or intended for use, to wedge or support cargo.

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.

Heat treatment: the process by 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.

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

ISPM15 mark: a mark which contains the information specified in Annex II of ISPM 15 and such other information as may be required by the UKWPMMP certificate.

Non-manufactured wood: wood which has not undergone a manufacturing process involving glue, heat or pressure or a combination of these.

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

Recycling: 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!')

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

Repair: a process whereby a previously used article of wood packaging material has one or more components removed and replaced with new and previously unused wood.

Re-use: a second or subsequent use of a unit of wood packaging material which is not changed or altered in any way and which requires no official intervention.

Signs of live pests: insect bore holes in wood with bark, and insect bore holes larger than 3 mm diameter in wood without bark.

Wood packaging material (WPM): defined in The Plant Health (Wood Packaging Material Marking) (Forestry) Order 2006 as **non-manufactured wood**, excluding wood of 6 mm or less, which is in the form of packing cases, boxes, crates, drums and similar packings, pallets, box pallets and other load boards, pallet collars or dunnage.



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