

"An Informed Customer is our Best Customer."

HOT! New IPPC Developments – Details Inside this Issue:

- July 5, 2006: ISPM-15 PHASE III Begins
- New ISPM-15 Fumigation Standards

Full Enforcement (PHASE III) of ISPM 15 begins in North America – effective date July 5, 2006

US Customs & Border Protection (CBP) has observed a 9-month staggered implementation schedule, as set forth by the National Plant Protection Organization, for the enforcement of import regulations on Wood Packaging Material (WPM).

The stagger has provided brokers and manufacturers alike the opportunity to become compliant and educated on the regulations, namely ISPM-15, affecting the international transport of wood packaging materials such as (*but not limited to*) wood pallets, crates, skids, dunnage, packing blocks, drums, etc.

Implementation Matrix for ISPM 15 for North America

| Phase I | Phase II | Phase III |
|---|---|--|
| Sept. 16, 2005 – Jan. 31, 2006 | Feb. 1, 2006 – July 4, 2006 | July 5, 2006 - onwards |
| Informed Compliance via account managers and notices posted in cargo with noncompliant WPM. | Enforcement of requirement for violative crates and pallets via re-exportation. Informed Compliance with other types of noncompliant WPM. | Full enforcement on all types of WPM. |

As the third and final phase of implementation begins, and the USDA continues the goal of decreasing the risk of introducing plant pests into the United States there are certain noteworthy changes.

On or after July 5, 2006 the following changes will take effect:

1. All informed compliance efforts (warnings, broker notifications, etc) at the shipment level under the WPM rule are discontinued.
2. If CBP discovers any WPM that are not properly marked (that is, lacking the proper IPPC logo) during the course of any visual examination of any cargo, the shipment will be considered in violation of the WPM rules
3. Export of all violative shipments will be ordered if the Port Director determines that it is not feasible to separate merchandise from the violative WPM. It is noted that separation, where feasible, is not an absolute right and is an option left to the government's discretion
4. All expenses incurred for the services of CBP officers and Agricultural Specialists involved in separation and exportation of cargo and/or merchandise will be billed to the importer or other party of interest.

To avoid a delay in merchandise availability and/or exportation expense, IFCO recommends full compliance with the regulation. IFCO is also available to answer any personalized questions surrounding compliance requirements.

For full details on Operating Procedures surrounding the ISPM-15 regulation, please refer to the following website: http://www.cbp.gov/xp/cgov/import/commercial_enforcement/wpm/

Information links:

A.P.H.I.S. (USDA)
<http://www.aphis.usda.gov/ppq/swp/>

C.F.I.A. (Canada)
<http://www.inspection.gc.ca/english/plaveq/for/noted98-08e.shtml>

AQIS. (Australia)
<http://www.aphis.usda.gov/ppq/swp/swaus.html>

Official IPPC portal
<http://www.ippc.int/IPPE/default.htm>

IPPC and ISPM 15 Background & Details

IPPC Regulations

The International Standard for Phytosanitary Measures N° 15 (ISPM 15), was passed March 15, 2002 by all 118 member countries of the IPPC, and covers both *hardwood and coniferous* Non Manufactured Wood Packaging (NMWP). Currently, only Heat Treatment and Methyl Bromide fumigation are approved treatment measures. Arrangements to allow other fumigation or chemical pressure impregnation would have to be negotiated between the exporting country and the importing country.

IPPC Approved Pest Treatment Standards:

➤ Heat Treatment (HT)

- The American Lumber Standards Committee, Inc. (ALSCI) oversees the Heat Treatment program for the U.S. All HT SWPM must carry the Heat Treatment marking (HT) approved by the IPPC.
- Solid Wood Packaging material should be heated in a schedule that achieves a minimum core temperature of 56°C for a minimum of 30 minutes.
- Kiln Drying (KD) or Chemical Pressure Impregnation (CPI): These and similar treatments may be considered HT treatments to the extent that they meet the above listed HT specifications. For example, CPI may meet the HT specification through the use of steam, hot water or dry heat; CPI alone without the HT certification does not comply.

➤ Methyl Bromide (MB) Fumigation: (!!NEW MINIMUM STANDARDS!!)

- The National Wooden Pallet and Container Association (NWPCA) oversees the Fumigation Program in the U.S.
- Must carry the approved Fumigation Mark (MB). Phosphine is not an approved fumigant as in the EU Measures.
- Same as Fumigation for the EU, Solid Wood Packaging Material should be fumigated with methyl bromide.
- The minimum standard for methyl bromide fumigation treatment for wood packaging material was originally defined as the following:

| OLD | Temperature | Dosage Rate | Minimum Concentration (g/m ³) at: | | | |
|-----|---------------|-------------|---|--------|--------|---------|
| | | | 0.5 hrs | 2 hrs. | 4 hrs. | 16 hrs. |
| | 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 |

The minimum temperature should not be less than 10°C and the minimum exposure time should be 16 hours.

- The updated requirements, **effective April 2006**, are as follows

| NEW | Temperature | Dosage Rate | Minimum Concentration (g/m ³) at: | | | |
|-----|---------------|-------------|---|--------|---------|---------|
| | | | 2 hrs | 4 hrs. | 12 hrs. | 24 hrs. |
| | 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 |

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

- Important footnotes:

- Please notice the required increase in both the methyl bromide concentration and the duration of fumigation.
- Material treated under the previous treatment schedule does not need to be retreated, remarked, or recertified.

Bulgaria: January
24, 2006

Honduras:
February 25, 2006

Japan: January
2007 (tentative
date of
implementation)

Lebanon: March
26, 2006

Seychelles: March
1, 2006

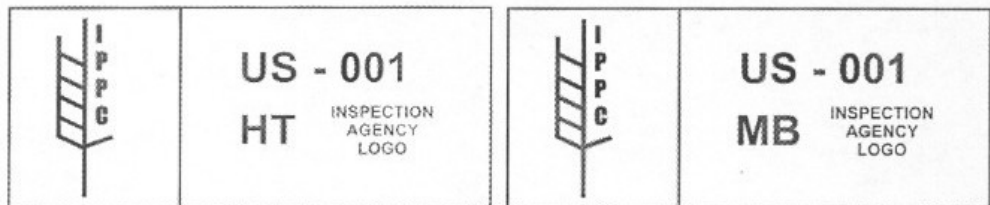
Syria: April 1,
2006

Ukraine: October
1, 2005

Vietnam: June 5,
2005

➤ **Marking Requirements:**

- ISPM-15 regulated WPM is required to be marked in a visible location on each article, preferably on at least two opposite sides, with a legible and permanent mark. Paper treatment certificates will no longer be required or accepted
- WPM must be marked with the following information:
 - International Plant Protection Convention (IPPC) logo
 - Two-letter International Organization for Standardization (ISO) code for the country that treated the WPM
 - The treatment facility number assigned by the national plant protection organization
 - Either HT for heat treatment or MB for methyl bromide.
- The USDA must approve any abbreviations other than HT for heat treatment and MB for methyl bromide.
- Unapproved language variations or treatment codes are unacceptable and will be considered violative.
- Examples of an acceptable WPM mark are as follows:



- To date, the only exception is for Guatemala (country code GT) who is approved to use TT to indicate heat treatment and BM to indicate treatment/fumigation with methyl bromide.

Country Specific Details:

➤ **Mexico:**

Secretaria de Medio Ambiente y Recursos Naturales (SEMARNAT) released its final rule on import and export SWPM. The rule states that SWPM imported into Mexico must be ISPM-15 compliant starting September 16, 2005 with its NPPO Partners (U.S. & Canada). IFCO Recommends **full** compliance after Sept. 16, 2005 to avoid any potential shipment delays or detention.

➤ **United States:**

Animal and Plant Health Inspection Service (APHIS) released its final rule "Importation of wood packaging material." Starting September 16, 2005, all imported SWPM except those coming from Canada must be treated and marked according to ISPM 15. (Note: The United States regulations control imports into America. They do not have authority over export wood packaging. For exports, be sure to be guided by the rules of the destination country.)

➤ **China:**

The General Administration of Quality Supervision, Inspection and Quarantine (AQSI) has decided it will now accept solid wood packaging treated in accordance with ISPM 15 and displaying the IPPC mark. However, coniferous wood from the U.S. treated with MB must be treated 24 hours (vs. the ISPM 15 standard of 16 hrs.). Although not a requirement, it is highly recommended to make a statement in Chinese language on the shipping invoice "WPM are ISPM 15-compliant," "WPM are exempt from ISPM 15" or "There is no WPM in this shipment."

➤ **Canada:**

The Canadian Food Inspection Agency (CFIA) has set April 1, 2005, as its target date for strict enforcement of ISPM 15. All countries must comply and only the U.S. has been granted an exemption.

➤ **European Union (EU):**

EU required ISPM 15 compliance on new SWPM starting March 1, 2005. SWPM already in circulation or in storage is not required to be treated and marked until December 21, 2007. The draft is now a commission directive that all 25 EU nations will be implementing. However, the EU has just announced it will delay a proposed "No Bark" amendment until 2009 while they study its impact. Previously the U.S. protested the proposed additional requirement.

➤ **Australia:**

Australian Quarantine Inspection Service (AQIS) has announced its amended import requirements for solid wood packaging; those requirements took effect September 1, 2004.

ISPM 15 compliant wood packaging is acceptable for shipment to Australia under the following conditions:

- Heat treated at 56°C for at least 30 minutes OR fumigated with methyl bromide and marked with the IPPC stamp
- **Bark-free**
- Include a packing declaration (Note: declaration for ISPM 15 compliant solid wood packaging must be submitted per consignment; an annual declaration is not acceptable).

➤ **Brazil:**

Brazil has published requirements adopting ISPM 15. The regulation goes into effect June 1, 2005. Their current import requirement based on ISPM 15 only applies to countries that have notified WTO and the Brazilian government of their adoption of ISPM 15, which includes the U.S.

➤ **Korea:**

The Korean National Plant Quarantine Service has published its rule adopting ISPM 15. The regulation went into effect June 1, 2005. Korea will now accept solid wood packaging treated in accordance with ISPM 15 and displaying the IPPC mark. However, Coniferous wood from the U.S. treated with MB must be treated 24 hours (vs. the ISPM 15 standard of 16 hours).

➤ **Additional Countries Requiring ISPM-15**

Argentina, Bolivia, Chile, Colombia, Costa Rica, Ecuador, Egypt, Guatemala, India, Jordan, Kenya, Lebanon, New Zealand, Nigeria, Peru, Philippines, South Africa, Trinidad and Tobago, Turkey, Vietnam, Venezuela



Sample of International IPPC Stamps

NOTE: IFCO Inside News is intended for information purposes only. Prior to any specific action, individuals should consult specific regulations in the country of destination. Specific information can be obtained using the information links provided herein and other resources available on the internet.