



UK WOOD PACKAGING MATERIAL MARKING PROGRAMME

ASSESSMENT NOTES – Issue 1

Introduction

As the new regime of using independent agencies beds in questions are inevitably being asked as new situations are encountered. This is to be encouraged and we have decided that it will be in everyone's best interests if, in addition to answering the initial query, the question and its answer are published for all to see. While primarily directed at those carrying out the assessments, we also plan to publish them on our website so that anyone with an interest in the Programme can perhaps benefit from our experience.

One of the issues we have focussed on, in collaboration with a kiln manufacturer and kiln processor, is the question of ongoing monitoring of the heat treatment process after initial assessment. We have recently revised Information Note 1, which has been sent to all participants in the Programme who carry out heat treatment, and which is also on our website.

This, then, is the first in a new series of "Assessment Notes". Issues shall be published on a 'needs be' basis and we anticipate that they will become less frequent as time goes on.

Question 1

When treatment facilities are being assessed, what checks should be carried out to ensure that data recording equipment is functioning properly?

Answer

All data recording or analysing equipment used in either heat treatment or fumigation processes must have valid certificates of calibration issued by a recognised accreditation facility such as UKAS. Calibration certificates are valid for 12 months, although many companies with ISO9000 accreditation may have equipment calibrated more frequently. Calibration certificates must be checked as part of the assessment.

Question 2

When assessing operations that have more than one heat treatment facility, does each chamber need to be assessed?

Answer

Each chamber must be assessed separately unless they share certain specified features such as dimension, construction material and boiler systems. These are set out in Appendix 2 to Information Note 1 (Revised June 2003) on verifying heat treatment facilities.

Question 3

Why have you decided that each run must incorporate a thermal probe inserted into the core of the wood?

In developing the heat treatment monitoring process, we have established that our 13 probe specification, developed some years ago, is appropriate for initial verification. From this, the slowest point in the chamber to heat up can be established, and this remains constant. We also know that a number of factors can affect the time taken for each charge to attain a wood core temperature of 56°C such as ambient temperature, initial moisture content, air humidity, all of which are variable. Accordingly, monitoring of each run, with a single probe inserted into wood positioned at the slowest point to heat up, will provide an accurate record with a high level of confidence.

Question 4

When assessing fumigation companies that have more than one operation within the company, do we need to assess each separate operating location and what checks should be carried out?

Answer

Because many fumigations are carried out 'on location' it would be impracticable to monitor a fumigation at each of the separate operating sites as part of the assessment. We have decided, therefore, that only one fumigation need be monitored.

Every fumigation operator must have a Certificate of Competence issued by the British Pest Control Association and this should be checked for each operator in the company carrying out work under the Programme. Calibration certificates for gas and temperature recording equipment issued by a recognised accreditation body such as UKAS must also be checked to ensure that all of the equipment used at the different locations are valid. Calibration must be carried out at least annually. Care should be taken to ensure that different operators and different locations are used for each assessment.

Question 5

What checks should be carried out when assessing a fumigation?

Answer

Checks should be made against the specification set out in Information Note 2 (verification of fumigation by Methyl bromide). In order to maximise use of the assessor's time, these should be undertaken once the fumigation area has been prepared but before the fumigant is introduced. This will enable you to ensure in safety that the physical preparation (stack size, air space, ventilation systems etc) has been carried out properly and that gas and temperature recording systems are in place. Once these checks have been completed, the assessor can leave the risk area and observe the introduction of the fumigant and the checks for gas leaks being carried out. The fumigation operator should be able to explain to you how he has calculated the mass of fumigant to apply and to demonstrate how gas concentration and temperature is being monitored and controlled.

Where it is not possible to monitor a fumigation of wood packaging material on the day set aside for the assessment, a fumigation of another commodity can be substituted. While the dosage rates, for example, may be different, the procedures and equipment should always be the same.

Question 6

What should we do if we consider that the company being assessed does not meet the requirements of the Programme?

Answer

We have identified two categories of failure to meet the Programme's requirements, and these are covered on pages 5 and 6 of Plant Health Leaflet 12. Where no significant shortcomings that would lead to an immediate withdrawal of approval to use the mark are found, a 'qualified approval' should be given detailing the shortcomings and what needs to be done to correct the situation. The participant has three months in which to correct matters and request a re-assessment (otherwise his approval to use to use the mark will automatically be withdrawn).

In the event that the assessor is of the opinion that a significant failing warranting immediate withdrawal of approval to use the mark exists, he should advise the designated person at the premises of his decision and the reasons for reaching it. If appropriate, he may discuss what action needs to be taken to remedy the shortcomings. He must also ensure that all product on the premises that has been marked as Programme compliant is either retreated properly or has the mark obliterated.

He must also advise the designated person of his right of appeal as per paragraph 18 of "Assessment Requirements" issued at the time of initial application to join the Programme.

Finally, he should immediately advise TIMCON by telephone of the outcome of the assessment so that they can amend their records and update the website accordingly.

Question 7

Do we need to collect copies of any records examined as part of the assessment process?

Answer

No. In the event that copies of any records are required for any purpose, these will be collected either by Plant Health Inspectors or Investigation Officers from our Legal Service.

Where there is no cause for concern, the assessor should simply record the nature of the records examined, and the satisfactory outcome. The number and type of record examined should also be recorded.

Question 8

When assessing a company that purchases heat treated raw material, should every piece be marked?

No. However, each pack must be marked "HT" or "heat treated" and there must be an identification number or code (usually a lot number) which can be cross checked against the relevant invoices. Under current EC rules there is no requirement that packs need to be marked in this way. It will therefore be acceptable for importers or others in the supply chain to add the mark, based on the evidence on either a declaration on the phytosanitary certificate accompanying the consignment (non-EU countries only), or the relevant delivery note or other commercial paperwork issued by the supplier (EU including other UK only). In all cases, certified copies must accompany the packs down to the manufacturer or repairer of wood packaging material.

NB: changes to the EC Plant Health Directive are currently being discussed which, once adopted (the provisions in Commission Directive 2004/102 applied in the EU from 1 March 2005), will require packs of heat treated wood, or their wrapping, to be marked "HT" or "heat treated" when imported from non-EU countries. Exceptionally, heat treated sawn wood from Canada may have each piece marked under their procedures.

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