



## **FORESTRY COMMISSION PLANT HEALTH SERVICE – INFORMATION NOTE (Revised December 2004)**

### **VERIFICATION OF HEAT TREATED TIMBER OBTAINED FROM UK OR SOURCES ABROAD AND AUTHORISATION FOR THE USE OF THE HT AND DB-HT MARKS TO COMPLY WITH THE INTERNATIONAL STANDARD FOR PHYTOSANITARY MEASURES ISPM 15<sup>1</sup>**

#### **INTRODUCTION**

This Information Note compliments the information contained in our sister Note entitled 'Verification of Heat Treatment facilities and Authorisation of the Use of the HT Mark to Comply with ISPM 15', which deals with the assessment process for heat treatment kilns and chambers.

Where a company wishes use the International Standard (ISPM15) HT mark on its Wood Packaging Material (WPM), but does not have its own heat treatment facilities, it will be necessary for the company to join the UK Wood Packaging Material Marking Programme ("the Programme") and obtain officially verified heat treated timber from accredited suppliers, either in the UK or from another country, either a Member State in the EU or a third country outside it.

#### **'HT' VERIFICATION PROCESS (AUDIT TRAIL)**

The verification process requires the availability of documentary evidence supplied with the heat treated timber (i.e. from outside the EU, either an industry, mill or phytosanitary certificate as required under Plant Health import requirements or, for wood sourced from within the EU, an invoice or delivery advice note) and the physical marking of timber identifying the consignment, lot or pack by a unique code which must also appear on the accompanying document. In addition, there must be a declaration on the accompanying document attesting heat treatment and, where treatment was not carried out by the supplier, the name of the heat treatment facility. Ideally, the timber should also be marked 'HT' or 'heat treated', either on each board or on each pack. Where the pack is supplied in wrapping, the mark may also, in addition to marking the pack or boards, be applied to the wrapping. These procedures apply regardless of where the timber was treated and are essential to ensure that full traceback is possible in the event that this proves necessary.

#### **Timber Heat Treated in the UK**

Before a registered WPM manufacturer or repairer can utilise timber for WPM, he must ensure that the supplier has treated the timber on his own premises in treatment facilities (kiln/chamber) assessed as part of their registration in the Programme. A manufacturer/repairer cannot simply purchase heat treated timber from a supplier and then apply the supplier's unique Programme registration mark to the finished WPM. Manufacturers and repairers must be registered in the Programme in their own right and must apply their own unique registration marks to finished articles in order to facilitate a trace back to them and where appropriate, the treatment facility should any WPM be found non-compliant.

When supplying heat treated timber to a WPM manufacturer or repairer, a supplier must be able to demonstrate that the timber meets the requirements of the Programme. Suppliers can achieve this by displaying their UKWPMMP registration number<sup>2</sup> on invoices, delivery notes and any other relevant commercial documentation and by including an attestation of treatment eg 'Heat Treated 56/30' or 'KD56°C/30 min'. Additionally they must also apply

<sup>1</sup> "Guidelines for Regulating Wood Packaging Material Used in International Trade" – ISPM 15. Published by the Food and Agriculture Organisation, Rome, 2002. Can be viewed on the FAO website <http://www.ippc.int/IPP/En/ism.jsp>

<sup>2</sup> NB: the inclusion of the words "Forestry Commission" and/or the two-tree logo is not permitted on any documentation. These are protected by Crown Copyright and may only be applied to treated WPM as part of the mark which includes the registration number issued to Programme members

the treatment code 'HT' to the timber packs supplied (ie either on each piece or each pack) attesting that the timber has been heat treated. Where the timber has been produced from debarked logs. The code 'DB' may also be included in both the documents and the mark on the wood itself. This marking of the treated timber combined, where appropriate, with the physical segregation of treated and untreated wood, enables both the manufacturer or repairer of WPM and the Assessment Agent to clearly identify treated material at the facility, and to link it to the appropriate documentation.

When ordering from a supplier that heat treats timber in the UK it should be made clear on all relevant documentation i.e. purchase orders, that the timber ordered is to have been heat treated to a minimum core temperature 56°C for 30 minutes (the ISPM 15 standard). The purchaser must then ensure that the timber supplied is both marked as heat treated and is accompanied by commercial documentation that attests heat treatment and the identified the heat treatment facility. The purchaser must be able to match the timber supplied to the documentation via timber pack numbers or some other identifying mark.

#### Timber Heat Treated outside the EU

If the supplier of the heat treated timber is outside the EU then, depending on the country of origin and species of wood, it must be accompanied by a mill, industry or phytosanitary certificate required under the EC Plant Health Directive and produced by the importer at the time of entry into the EU. The documentation may state that it has been subjected to heat treatment. For example, under the Directive, sawn wood of conifers (except *Thuja L.*) originating in Canada and the USA must be heat treated and marked accordingly before the timber can be permitted to land in the EU. For wood originating elsewhere outside the EU, an additional declaration may be included in the phytosanitary certificate attesting that the wood has been heat treated in an officially accredited heat treatment facility. Unless the consignment has been fully cleared for entry into the EU in another Member State, the original of the industry, mill or phytosanitary certificate must be produced to and retained by a Forestry Commission inspector at the time of arrival into Great Britain. Importers may, however, retain copies of these certificates and may forward one to each subsequent purchaser of timber as proof of heat treatment.

Where, for reasons of commercial confidentiality the importer wishes to do so, he may obscure any information on the certificate other than the serial number, the date of issue, the issuing authority and the description of the consignment including identification numbers. In the event that it proves necessary, the Forestry Commission will be able to retrieve the original certificate with all other information intact and establish full traceback.

#### Timber Heat Treated in another Member State of the EU

Under the Plant Health Directive there are no documentary requirements concerning timber sourced from within the EU and consigned to the UK other than for wood of conifers retaining bark, wood of sweet chestnut (*Castanea*) retaining bark and wood of plane (*Platanus*). For wood of conifers and sweet chestnut retaining bark and all wood of plane, a plant passport is required to attest that the wood has either (a) been kiln-dried to below 20% moisture content or (b) originated in a pest-free area. Commercial documentation must therefore make reference to the fact that the wood has been heat treated and identify the heat treatment facility, which must have been officially accredited by the relevant Plant Protection Organisation in the country concerned. It must also be possible to associate the commercial documentation with the timber using pack numbers or other unique codes. It is recommended that wherever possible packs are marked 'HT' or 'heat treated', either on a piece by piece basis or by pack as is currently the case with heat treated timber from Sweden (see para below). However, unless specific EU arrangements are adopted, this must remain a recommendation for the time being, but its use is to be encouraged. It may be that the EU will agree to utilise the Registered Forestry Traders scheme and plant passporting arrangements to provide traceability of heat treated timber supplied from one member State to another etc in the future, however, this is only a consideration at present.

### General Heat Treatment, Marking and Audit Trail Information

Different countries have various ways of attesting that timber has been heat treated. For example, heat treated softwood timber imported from Sweden (an EU Member State) is marked with the Swedish Board of Agriculture mark '**KD – 56/30**' which satisfactorily attests that the timber has been heat treated. Whereas timber from Russia currently carries no heat treatment markings but is accompanied by a phytosanitary certificate, which may also satisfactorily attest that the timber has been heat treated.

For the purposes of the UK Wood Packing Material Marking Programme a receiver of timber sourced from outside the UK must be satisfied that the timber is heat treated to the ISPM15 standard. This should be done through the checking of all relevant documentation and the physical inspection of the timber supplied for appropriate marks, declarations and treatment specifications etc. The supplier must demonstrate this to their customers by the production of copy phytosanitary, mill or industry certificates, invoices, delivery notes or any other relevant commercial documentation which include an attestation of treatment eg 'Heat Treated 56/30' or 'KD56°C/30 min'.

Where an importer is satisfied that a consignment originating outside the EU is heat treated, but the packs carry no treatment mark, he may with the prior approval of a Forestry Commission inspector under a general obligation imposed on him as part of his registration as an importer, mark each pack himself with the treatment code 'HT'. This mark must be applied only after completion of the import inspection and after issue of a Certificate of Clearance (Form PHF28) by an inspector. In addition, where the import requirement demands that the wood be stripped of bark, he may also add the code 'DB'.

When ordering from a supplier who obtains heat treated timber from outside the UK it should be made clear on all relevant documentation i.e. purchase orders, that the timber to be supplied has been heat treated to a minimum core temperature 56°C for 30 minutes (the ISPM 15 standard). The purchaser must then ensure that the timber supplied is accompanied by a delivery note and/or invoice that attests the treatment standard eg Heat Treated 56/30 or KD56°C/30 min. The purchaser must be able to match the timber supplied to the documentation via timber pack numbers or some other identifying mark.

NB: Timber that is simply kiln-dried to below 20% moisture content is, for the purposes of the Programme, not acceptable unless the timber has also been heat treated to a minimum of 56°C for 30 minutes, measured at the core. For example timber that is both kiln dried and heat treated, that carries the Swedish Board of Agriculture mark '**KD – 56/30**' is acceptable.

### RECORD KEEPING

All members of the Programme who purchase heat treated timber, whether it is treated in the UK or abroad must keep timber stock records that can be audited and verified by an independent Assessment Agency recognised by the Forestry Commission in order to meet the requirements of the Programme.

These records must include:

- Timber purchased for UKWPMMP purposes including:
  1. quantity ordered
  2. date ordered / delivered
  3. supplier name
  4. purchase order number
  5. delivery note number
  6. invoice number
  
- Timber utilised for UKWPMMP purposes including:

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1. quantity used
2. date of manufacture
3. client details

- Any timber remaining on stock,
  1. This should be a balance of the quantity ordered less the quantity used and any loss during manufacture

Either a manual or computerised balance sheet detailing the above will be sufficient. Some companies, however, will wish to provide more detailed information on job type and number for specific customers etc and this is also acceptable.

WPM manufacturers or repairers who wish to utilise only heat treated timber throughout for all products regardless of their final destination will only have to produce a balance sheet showing quantity ordered and stock remaining. However, a declaration stating the use of only heat treated timber will be required to support this. The Assessor must be given access to all records of material purchased in order to satisfy himself that the declaration can be substantiated.

#### DEBARKING (DB)

In the UK all members of the Programme are required to use the mark 'DB', together with the HT mark. The manufacturer must be able to demonstrate that an appropriate inspection system is in place at the production site. The inspection system must include an undertaking to inspect all wood before it is utilised and measures must be in place to either remove all pieces with bark, or otherwise remove and safely dispose of the bark.

**NB:** Strictly speaking, to meet the definition of 'debarked' and qualify for the use of the 'DB' mark, wood has to be produced from debarked logs. However, as the same outcome is achieved where residual bark is removed after the sawing process and before the wood packaging material is marked, this will be accepted.

#### FURTHER INFORMATION

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