

**THE UKWPMMP – Addendum. EXEMPTION FROM RETREATMENT AND REMARKING REQUIREMENT WITHIN THE UKWPMMP.**

**QUESTION AND ANSWER PAPER**

Q1. Is there a defined route for or compulsion for a Euro Pallet to be returned to a designated Epal/Brepal registered repairer?

**EPAL are looking to increase the number of licenced repairers. At the moment there is not a defined route, however, customers are being educated that only EPAL registered repairers can sell EPAL Euros.**

Q2. What is the frequency of the 'regular' unannounced audits that shall be carried out by the relevant pooling company on behalf of the FC to confirm continuous compliance by the individual Closed Loop Pooling companies and their respective approved manufacturers?

**Minimum once a month**

Q3. How easy is it for a lay person to differentiate between a Euro Pallet and a Euro style pallet?

**Extremely – EPAL Euros are marked on 6 blocks and are manufactured using 22mm timbers. The majority of euro styles are of much lighter construction and do not have EPAL markings etc**

Q4. Will non licenced Epal/Brepal repairers who are participants in the UKWPMMP be able to apply to the FC for exemption from retreatment and remarking?

**The exemption option is available to all UKWPMMP participants currently but only applicants that are able to demonstrate full traceability and rigorous control procedures will have their applications approved. However, in the case of EPAL pallet repairers applying for an exemption from the retreatment and remarking of EPAL pallet repairs they must be licenced EPAL repairers before their application for this activity will be considered. The repairer can apply for an exemption for non EPAL pallet repairs and their application will be considered without the need for an EPAL repair licence. This situation arises because only licenced EPAL repairers are legally permitted to repair EPAL pallets to ensure that the EPAL pallet specification is maintained. The repairer could opt to remove the EPAL logos from the pallet to repair it with an exemption where they are not licenced EPAL repairers.**

Q5. If a Euro pallet has been repaired with non ISPM15 treated components by a non-registered Epal/Brepal repairer and the Epal/Brepal repairer handling the pallet thereafter is exempt from retreatment and remarking and they use new treated components in their repairs – how would they know about the presence of untreated material and therefore treat any untreated component parts that are existing in the pallet?

**This is a difficult scenario, however, the EPAL regulations clearly state that the licenced repairer accepts full responsibility for the whole pallet when they sell it on, therefore ,if there is any doubt**

**at all then the repairer will heat treat the complete pallet. Again this is why EPAL / Brepal are looking for more repairers to become licenced repairers**

Q6. Will Europallets that were manufactured prior to 2010 be made ISPM15 compliant?

**Any pallets being sold on have to meet the EPAL specification this includes heat treatment. So the repairer will have to heat treat the whole pallet.**

Q7. Is it not possible to efficiently remove branded ISPM15 marks with a sander?

**For health and safety reasons it is not recommended that a sander is used to remove branded ISPM15 marks especially where large numbers of marks may have to be removed. Also excessive grinding will be removing a good section on the block which in time could lead to strength issues etc.**

Q8. Can Epal/Brepal legally require unregistered repairers of Epal/Brepal pallets to remove the Epal/Brepal logos from Epal/Brepal pallets that have not been repaired to the Epal/Brepal standards?

**Yes they can.**

Q9. The Closed Loop approved manufacturers and repairers mark is discretionary – should this not be compulsory to aid traceability?

**ISPM15 concerns the information within the border of the ISPM15 mark only. The pallet pools are aware that if they cannot provide site traceability then should a problem with their pallets be found in another country then all site operations have to be suspended until matters are investigated rather than just one site's operations being suspended and investigated.**

Q10. To achieve any traceability specific site identification marks are required. A new registration should be made for each mark, issuing an individual number. If Closed Loop pallet pools elect to use the generic mark option then they will have to apply for registration in their own right – is that correct?

**Yes, two separate assessments will then be required for the different ISPM15 marks applied on a site every 6 months at additional cost to the operators.**

Q11. Doesn't regular unannounced audits carried out by the relevant pooling company permit unscrupulous manufacturers/repairers to be their own Policing agent.... where rules and regulations' can potentially be circumnavigated?

**The unannounced audits by the relevant pooling company will be in addition to the independent audits of all individually registered sites, as per current rules. These unannounced audit reports will be shared with the UKWPMMP Independent Assessment Agencies responsible for the site assessments for information so that they can review them and consider their effectiveness.**

Q12. Epal/Brepal shall ensure that the exemption criterion becomes an integrated feature of the monthly audits. What exemption criterion and what monthly audit?

**The exemption criterion are those that apply to the exemption to retreatment and remarking requirement for pallets repairs i.e. the application for exemption from the site will include details of the repair operation's full traceability and rigorous control procedures which will be assessed to ensure that they meet the Programme's requirements. The monthly audits are the manufacturing and repair specification audits that are performed by Epal/Brepal inspectors.**

Q13. Within the exemption requirements pallets could display two different ISO country marks. How would those investigating interceptions know which is the original and which is the repair mark? There would also seem to be no way to know which component has been repaired (especially as they could be using recycled components).

**Indications from one of the larger closed pallet pool operatives at present are that they favour the site specific mark which will be applied outside the border of the ISPM15 mark. When this is used it results in the Closed Loop Pallet Pool operative assuming full responsibility and liability for the whole pallet.**

Q14. In the event of a generic mark not being applied and a non-compliant mark being removed and a standard manufacturer's mark being applied who assumes responsibility and liability?

**The standard manufacturer assumes full responsibility and liability for the pallets via the application of their mark.**

Q15. The matter of utilising Reclaimed Timber Components sounds to be an incredibly difficult area to "Police", with dismantled / recycled timber components being stored in big piles across workshop floors. Is it not considered that this type of situation could only truly be monitored by a full time third party inspector on site?

**The site specific application from the retreatment and repair from repairs requirement must make it clear as to how this area is to be practically and satisfactorily controlled prior to an exemption being granted.**

Q16. In the Exempt Closed Pools Flow Chart and the right hand side sequence coloured in blue - What happens to these designated non-ISPM pallets? What controls are there to ensure they don't get unscrupulously marked with an ISPM15 mark and fed back into the compliant system?

**The site specific application from the retreatment and repair from repairs requirement must make it clear as to how this area is to be practically and satisfactorily controlled prior to an exemption being granted.**

Q17. In the Exempt Closed Pools Flow Chart and the green sequence headed by the flow entitled 'Is the ISPM mark legible or not? And the 'No' option[ N]- 'Turn or replace block to enable marking' - If the mark is not legible how does anyone know the pallet is compliant in the first place?

**If the ISPM15 mark is not legible and traceability is lost then the pallet MUST be treated as non-compliant.**

Q18. Can any pallet, case, crate or box manufacturer participating in the UKWPMMP apply for an exemption from the retreatment and remarking requirement for repairs?

**Yes, other manufacturers/repairers can be included as the UKWPMMP already makes a provision for this type of exemption provided that the control criteria are met. Both the Closed and Open pallet pool sectors have put a case forward for exemption and it is up to the Advisory Council to consider whether it should, in principle be granted or not. Furthermore it is then up to a panel of evaluators to decide if the detailed application submitted by the individual site meets the criteria to grant the exemption.**