

The UK Wood Packaging Material Marking Programme

Requirements for regulating wood packaging
material in international trade ISPM15



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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.

In 2002, an International Standard for a Phytosanitary Measure, *Guidelines for regulating wood packaging material in international trade* (ISPM15), was adopted by the Interim Commission on Phytosanitary Measures (now the Commission on Phytosanitary Measures). Most of the UK's international trading partners around the globe have now implemented landing regulations for wood packaging material based on ISPM15.

In order to help UK manufacturers and exporters demonstrate compliance with ISPM15, the Forestry Commission in Great Britain and the Forest Service, an agency within the Department of Agriculture, Environment and Rural Affairs in Northern Ireland, established a national wood packaging material marking programme in conjunction with the trade. The United Kingdom wood packaging material marking programme (UKWPMMP) regulates the manufacture, repair and re-manufacture of ISPM15 compliant WPM in the UK 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 an Advisory Council consisting of representatives from the Forestry Commission, Forest Service, Timber Packaging and Pallet Confederation (TIMCON), National Association of Pallet Distributors (NAPD), United Kingdom Forest Products Association (UKFPA), Confederation for Forest Industries (Confor) and British Pest Control Association (BPCA).

This Guide sets out the obligations of manufacturers, repairers, remanufacturers and others involved in the wood packaging material sector under the **UK Wood Packaging Material Marking Programme**. The key points to note are:

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

Regulated wood packaging material includes crates, boxes, packing cases, dunnage, pallets, cable drums and spools or reels which may be present in any imported consignment – including consignments that would not normally be subject to phytosanitary control.

Applying for a certificate

The UK Wood Packaging Material Marking Programme is administered by TIMCON, acting on behalf of the Forestry Commission and Forest Service. More information and an application form are available from the ISPM15 page at www.ukwpmmp.org.

On receipt of an acceptable application, you will be advised to arrange for an independent assessment agency, recognised by the Forestry Commission and Forest Service, 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 wood packaging material 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 found at www.ukwpmmp.org.

When you apply for a certificate you must nominate a Designated person. This person must have full technical knowledge and experience of the wood packaging material production methods specified in your application. The Designated person must be available during the assessment process and be able to ensure access to material, production areas and equipment, and all relevant records.

The assessment process

The assessment will review the systems, including processes and records, pertaining to the manufacture, re-manufacture, repair, treatment and marking of wood packaging material. 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 wood packaging material;
 - heat treatment;
 - processed wood;
 - debarked and bark-free wood;
 - signs of live pests.

If the application is successful the Forestry Commission 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 the source of ISPM15 compliant wood to production and marking of the finished product.
- The Order recognises the approved measures set out in ISPM15, which are either heat treatment, dielectric heating (e.g. microwave) or methyl bromide fumigation. However, as the storage and use of methyl bromide was banned in the UK in March 2010, this treatment option is no longer permitted within the UK Wood Packaging Material Marking Programme. UK trading partners abroad are still permitted to use methyl bromide fumigation for the treatment of WPM and compliance with ISPM15 for UK import purposes.
- 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 ISO9001 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

You must pay a registration fee and an assessment fee to join the UK Wood Packaging Material Marking Programme. 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 website at www.ukwpmmp.org. 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.

ISPM15 requirements

All wood packaging material must be made of debarked wood. For this standard, any number of visually separate and clearly distinct small pieces of bark may remain if they are:

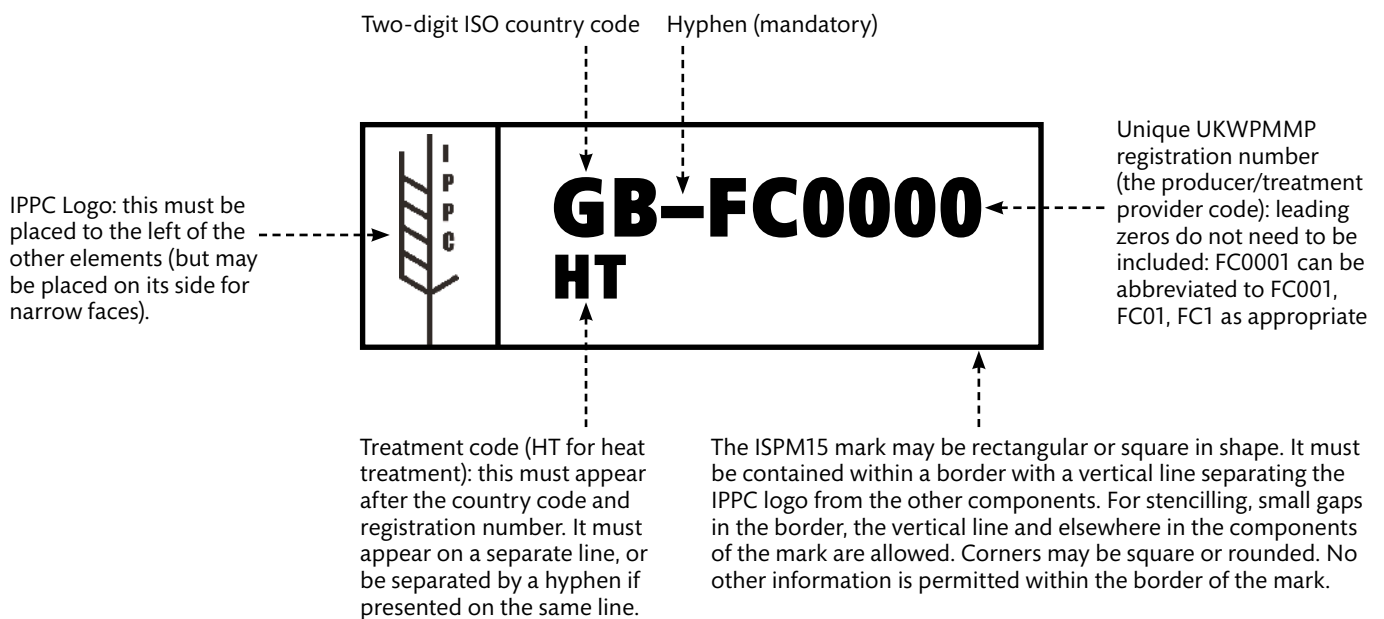
- less than 3 cm in width (regardless of the length); or
- greater than 3 cm in width, with the total surface area of an individual piece of bark less than 50 square cm

All new/repaired/remanufactured wood packaging material, including dunnage, must be heat treated. This should be in accordance with a specific time-temperature schedule that achieves a minimum temperature of 56°C for a minimum duration of 30 continuous minutes throughout the entire profile of the wood (including the core).

The ISPM15 mark

An ISPM15 mark consists of three codes (country, producer and approved measure), and the IPPC logo. An example of an ISPM15 mark is shown in Figure 1. More detailed information regarding the quality of marking required by the UK Wood Packaging Material Marking Programme can be found at www.ukwpmmp.org/schemeupdates.

Figure 1 An example of an ISPM15 mark*.



*At import, countries should accept previously produced wood packaging material carrying a mark consistent with earlier versions of the standard. Other examples of the mark are provided on page 7.

How to mark articles of wood packaging material:

- Each article of wood packaging material 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.

Processed wood (e.g. plywood, chipboard) and wood less than 6 mm thickness 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 solid wood components, which have been heat treated, may include the treatment code letters 'HT'. Where possible, the ISPM15 mark shall be applied to the solid wood element of the article of wood packaging material.

Repaired or re-manufactured ISPM15 WPM

In order to maintain chain of custody and accountability, repaired and re-manufactured ISPM15 compliant wood packaging material 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 Forestry Commission may grant an exemption from re-treatment and re-marking. Companies may apply to the Forestry Commission 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 by the Forestry Commission.

Specific guidance on exemptions for pallet pool operators is provided in a separate addendum to this guide entitled "Addendum – Exemption from retreatment and remarking within the UKWPMMP". The administrative procedure for submitting applications for exemptions from pallet pool operators is set out below -

Applications for exemption from retreatment and remarking mark requirement within the UKWPMMP

1. The exempt mark programme only applies to premises registered within the UKWPMMP.
2. Sites which are not part of the UKWPMMP should initially apply to join the Programme before being considered for exemption from retreatment and remarking (See <http://www.ukwpmmp.org/ApplicationPack/Default.asp>)

3. Members of the UKWPMMP, or agents acting on their behalf, must apply to the Forestry Commission for an exemption from the UKWPMMP requirement for retreatment and remarking of repairs on a site by site basis.
4. Applicants can use the addendum to the UKWPMMP the 'Exempt Mark Programme' as a model although their application should provide a **detailed** explanation of how the pallet pool repairs will operate at each site.
5. There is no standard application form for seeking an exemption as the internal site controls will be different at each site. If you are uncertain about how to set out an application you may wish to seek advice from a consultant working in the field of compliance or quality assurance.
6. Applicants should set out in as much detail as possible their traceability and control procedures.
7. It is helpful to provide a process flow diagram with the application to provide a quick overview of the repair operations.
8. The Forestry Commission will consider the application for each site based on the evidence presented of the level of control and traceability.
9. Exemptions must be approved in writing by the Forestry Commission before the exemption can apply. Conditions to the exemptions will apply.
10. Applications for exemptions will be considered by the Forestry Commission and feedback will be provided on refused applications. The application and feedback will be free of charge.
11. Applications will be considered from sites that wish to apply a generic ISPM15 pallet pool mark, in addition to other marks which may already be approved for the same site.
12. These applications will be treated as new to the UKWPMMP and will require an initial assessment prior to applying the mark. A re-assessment fee of £120 will apply to each additional mark be applied at the site.
13. Generic ISPM15 pallet pool marks will be authorised provisionally, until an independent assessment has been made at the site (to coincide with 6 months assessments for existing marks).
14. A full exemption authority will be confirmed by the Forestry Commission when the 6 monthly assessment is completed satisfactorily.
15. The fee for all independent assessments is a commercial fee which is agreed between the UKWPMMP registered site and the Independent Assessment Agent.

16. Applications for exemptions can be emailed to plant.health@forestrycommission.gov.uk or can be posted to:

Forestry Commission
Plant Health Service
Silvan House
231 Corstorphine Road
Edinburgh
EH12 7AT
Tel: 0300 067 5155

Imported WPM that does not comply with ISPM15

Action taken is at the discretion of the Plant Protection Organisation of the importing country. Non-compliant wood packaging 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. Where treatment is approved as a remedial option, wood packaging material 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.

Renewing a certificate

The holder of a certificate may apply for renewal no earlier than one month before its expiry by an independent assessment agency at the certificate holder's expense. 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 Designated person within your organisation.

Official monitoring

In order to ensure that assessments are being carried out properly and consistently, plant health inspectors from the Forestry Commission or Forest Service will audit assessment agencies. They will co-ordinate 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 wood packaging material, inspect and make copies of documents relating to the manufacture of wood packaging material 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. where they are illegible).

Where an inspector has grounds for suspecting that a person has applied, or intends to apply a mark to wood packaging material 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 (as amended). 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.

Examples of acceptable ISPM15 marks



An example of a mark where the registration number is on a separate line from the country code. Note that use of the hyphen is mandatory



An example of a mark where the border of the enclosing box has rounded corners.



An example of a mark where the heat treatment code is on the same line as the country code and the registration number. Note that it must be separated here by a hyphen.



An example of a mark applied by stencilling; small gaps are permitted in the border, lettering and other elements.



An example of a square mark: the country code, registration number and treatment code on separate lines.



An example of a linear mark, where the IPPC logo has been rotated to lie horizontally

Further reading and 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:

The Secretary
UK Wood Packaging Material Marking Programme
TIMCON
Q House, Troon Way Business Centre
Humberstone Lane
Thurmaston, Leicester LE4 9HA
0116 274 7357
timcon@associationhq.org.uk
www.ukwpmmp.org

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

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07799 657417
nick.hazlitt@forestrycommission.gov.uk

For information and advice on plant health matters in Northern Ireland, visit: www.forestserviceni.gov.uk or contact:

Department of Agriculture, Environment and Rural Affairs
Forest Service
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Upper Newtownards Road
Ballymiscaw
Belfast BT4 3SB
0300 200 7847
planthealth.forests-service@daera-ni.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
- FCPH005 Importing firewood
- FCPH007 Minimum facilities at ports

Other publications

For information on all Forestry Commission publications, visit: www.forestry.gov.uk/publications.

Glossary

Bark-free wood: wood from which all bark, except ingrown bark around knots and bark pockets between rings of annual growth, has been removed.

Debarked wood: wood that has been subjected to any process that results in the removal of bark. (Debarked wood is not necessarily bark-free wood).

Dunnage: wood packaging material used to secure or support a commodity but which does not remain associated with the commodity.

Heat treatment: the process by which wood packaging material is heated in accordance with a specific time-temperature schedule that achieves a minimum temperature of 56°C for a minimum of 30 continuous minutes throughout the entire profile of the wood, including at the core.

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

ISPM15 mark: the mark which contains the information specified in Annex II of ISPM 15 (2009).

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

Processed wood packaging: products that are a composite of wood constructed using glue, heat or pressure or any combination thereof.

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: 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.

