

Forestry Commission ISPM15 meeting 30/11/2004

Recorded Questions and Answers

Q&As

1. What is the current position in China – will they be implementing ISPM15?

A: Mr Brownlee believes that China will implement ISPM15 when the EU does. His best 'guestimate' is that this will probably happen around June 2005. China will implement ISPM15, but the date of implementation remains unconfirmed.

2. Who else requires Phytosanitary Certificates, other than China?

A: Mr Brownlee says that no other country to his knowledge is requiring them for wood packaging material, with the possible exception of Saudi Arabia. But his best advice to the meeting members was that they should check the landing requirements of the importing country before shipping the goods.

3. With regard to the fumigation treatment of WPM going to Australia, the Australian authorities backtracked on the 24hr requirement, and reverted to the 16hrs exposure time as stipulated in ISPM15.

4. With regard to best practise and standards regarding the compliance of ISPM15, Mr Brownlee advises that the Forestry Commission are following up complaints and issues brought to their attention and that there is policing of the scheme in hand. Mr Brownlee suggested that it is inevitable that prosecution will happen eventually either for fraudulent use of a wood mark or for some other illegal practice.

5. Is there anything that can be done to stop HT timber going black following treatment?

A: Yes, kiln drying will take out more moisture from the timber, so manufacturers have the option to increase their service to their customers by offering KD-HT, even though the ISPM15, does not require KD. It is important to draw the distinction between the phytosanitary requirement to kill pests (i.e. HT), and the commercial issue of combating stain and mould (by drying to an agreed maximum moisture content).

ISPM15

Mr Ian Brownlee from the Forestry Commission outlined the current serious controversy of the US challenging the EU's requirement for the debarking of timber packaging which the US considered was not technically justified. Mr Brownlee advised the meeting that Mr Burgess, in conjunction with his counterparts in some other member States, had submitted a scientific justification for the debarking requirement to the US via the EC. He commented that the main points of the justification included reference to –

- EU Inspectors being unable to assess by visual examination whether signs of the presence of many harmful organisms are present when the symptoms are obscured by bark
- The EU's concern over the potential risk of infestation or re-infestation by certain pests after treatment where the material is not debarked

In response to a question about the possibility of the US retaliating in some way if the EU was successful in defending the debarking requirement, Mr Brownlee commented that he could not think of any way that the US could retaliate given that it had published a very detailed final rule (Federal Register Vol. 69, No 179) which justified its implementation of ISPM15 on 16 September 2005 and that the EU had submitted comments on the implementation requirements.

Mr Brownlee added that the UKWPMMP members would be advised of the outcome of the US's challenge as soon as it was concluded.

Mr Brownlee confirmed that Australia had implemented ISPM15 on 1st September and that Australia required a Supplier/Packing Declaration to accompany consignments containing wood packaging material. He clarified that the declaration could be completed by the Exporter as AQIS had confirmed that their reference to "Suppliers" also meant "Exporters". Suppliers (ie the exporters) do not need to put ISPM 15 numbers on the packing declarations. The only number that is required is a numerical to link between the declaration and the container/shipment. The intention is for the supplier to fill out the declaration as they are the ones that AQIS will be targeting for increased surveillance/profiling if surveillance shows a problem.

Mr Brownlee then advised the meeting members of Australia's requirement for processed wood packaging to be treated (heat treated or Methyl bromide fumigated) and be accompanied with a treatment or phytosanitary certificate. This requirement was due to the fact that AQIS had historical evidence of processed wood packaging being infested with wood borers. Treated processed wood packaging material destined for

Australia does not have to be marked but it must be shipped within 21 days of treatment.

Mr Brownlee commented that Australia's advice to exporters using process wood packaging was that - "AQIS is reviewing its current import conditions for commodities solely comprised of panel products and wood packaging comprised of panel products with the aim of developing more streamlined import conditions that are consistent with identified quarantine risks and the benefits of particular manufacturing processes. These review process may take some time but some changes are expected early next year".