

Q&As - ISPM15 Meeting on Tuesday 25th January 2005

Question 1:

With regard to Australia, please clarify the treatment acceptable for panel products.

Answer:

The Forestry Commission attempted to clarify this issue via AQIS prior to the TIMCON meeting but it did not receive a response. It was understood that treatment certificates are being accepted and that no problems had been encountered by exporters. The Forestry Commission and TIMCON will post any updates regarding the use of panel products as Wood Packaging Material on the websites as soon as they are received.

Question 2:

With regard to the calibration of dataloggers and probes for heat treatment chambers – why does the Forestry Commission insist upon temperature recording equipment being UKAS calibrated and certificated annually, which is more expensive than the equipment simply being tested against UKAS certified equipment.

Answer:

The Forestry Commission must provide Assessment Agencies with a calibration check that is easy to perform and ensures that treatment facilities are working to a common standard. UKAS calibration and certification is recognised internationally. It is difficult to ensure that calibration is performed to a common standard if various companies and individuals with varying standards and competencies are permitted to certify calibration tests. However, if a company supplies the Forestry Commission with details of an alternative protocol it will present it to the UKWPMMP Advisory Council for consideration.

Question 3:

With regards to the repairs of Wood Packaging Material, please give the details of acceptable repair.

Answer:

If you alter the identity of the Wood Packaging Material, then re-treatment must be done and the original mark must be obliterated.

Question 4:

With regard to HT or MB, how long does the treatment last?

Answer:

Both treatments are considered to be permanent.

Question 5:

Various issues concerning second hand pallets being sold and repaired – with HT marks on them.

Answer:

The FC confirmed that planned statutory regulations for the UKWPMMP will make it an offence to repair or alter Wood Packaging Material without the terms of the UKWPMMP and leave original manufacturer's and treatment marks on the repaired articles. These marks must be obliterated and new ones applied if the articles are subjected to re-treatment during repair or remanufacture operations.

Question 6:

Methyl Bromide – what are the phase out dates?

Answer:

It was confirmed that the use of Methyl bromide is shortly to be phased out, although there will remain exemptions for certain quarantine including ISPM15 and pre-shipment uses.

Question 7:

Dunnage entering the EU from Third Countries - what is required?

Answer:

From 1st March 2005, dunnage must either be ISPM15 compliant **OR** on a temporary basis until 31st December 2007 it must meet the minimum landing requirement for dunnage ie. bark free and free of pests and signs of live pests. From 31st December 2007, it must be ISPM15 compliant i.e. treated and marked to the same standard as Wood Packaging Material.

Question 8:

Various issues about traceability of pallets – fraudulent use of people's marks – how to stop it?

Answer:

Fraudulent use is not unique to WPM or the UKWPMMP and is a concern in all areas of enforcement. New Statutory Regulations due to be introduced in summer 2005 will cite this as an offence and prosecutions would be pursued with vigour. FC will act upon confidential information to trigger investigations.

Question 9:

Is there any tests to prove that treatment types have been performed?

Answer:

There is no test to confirm that timber has been heat treated. There is an expensive laboratory test that can be done to confirm that Wood Packaging Material or a commodity has been exposed to Methyl Bromide, but doesn't give an indication of the gas concentration used during the fumigation and must be performed as soon as possible after treatment.

Question 10:

I have three registered sites all in the same street – can I have one registered number to cover all three sites so that I can reduce my Programme costs?

Answer:

Unique Forestry Commission registration numbers are SITE SPECIFIC with the exception of fumigation companies, so therefore, each site must be registered.

Question 11:

Do treatment facilities have to mark each piece of timber with their registration mark when supplying treated timber packs to wood packaging manufacturers?

Answer:

NO. The packs of timber simply have one mark applied to the pack to identify it as a treated pack. If individual pieces are to be used for dunnage then the treatment facility may mark each piece. The treatment facility has no way of knowing what timber is being used in the manufacture of a finished article and therefore the manufacturer should apply their own mark to fabricated articles to provide traceability of that article.

Question 12:

Can the UKWPMMP fees be reduced for manufacturers dealing in small volumes of purchased heat treated material for limited WPM article manufacture.

Answer:

Changes to the fees structure must be agreed with the UKWPMMP Advisory Council. At a meeting of the Advisory Council members on 8th February 2005, it was decided that 'As the existing system is working well and charges are competitive with other countries, it was agreed that there will be no alteration of the UKWPMMP fees'. Regarding reduced fees for small volume users, it was agreed that this proposal would complicate the system. It was agreed that a clarification note would be sent out to all programme participants stating this resolution.

Question 13:

In your 10th Jan "Update" it does not specify for some countries if a certificate is required or not, how can this be clarified? Do we assume none required if not specified?

Answer:

If a country is implementing ISPM15 as a landing requirement for Wood Packaging Material, it can be assumed that a phytosanitary certificate is not required as one of the main concepts of ISPM15 is to provide certification via the wood mark and not via a separate piece of paper.

Question 14:

Europe, my understanding is that from 1st March 2005 the wood packaging entering the EU from Third Countries will need a stamp but NOT a certificate?

Answer:

That is correct - all Wood Packaging Material entering any of the 25 EU member States from a third country (note Switzerland should be regarded as an EU member State) should be treated and marked to ISPM15 standards and there is no requirement for a phytosanitary certificate. Some less developed countries which have not put in place wood marking programmes and therefore cannot meet ISPM15 requirements are currently making representations to Brussels requesting that the EU member States should accept phytosanitary certificates indicating the treatment types in lieu of wood marks and these are currently being considered. It should be noted that there is no requirement to treat and mark wood packaging material which is simply moving between EU member States.

Question 15:

Australia, you said yesterday that they will NOT ACCEPT PLYWOOD CASES (Manufactured Wood Product) unless the Plywood is further Heat Treated or Fumigated. We have been under the misunderstanding that Australia accepted the manufacturing process of the MWP to be acceptable, I now need to talk again to ALL my customers and explain my mistake - please clarify when this became apparent. What have I missed?

Answer:

We had indications that Australia were going to continue to control processed wood packaging material prior to their implementation of ISPM15 on 1st September 2004 but we did not get any details until the end of the year after having pressed AQIS for a response. They finally provided us with a statement which we could pass on to the trade and this has now been published on both the Forestry Commission's and TIMCON's websites. As soon as we receive details of AQIS's review of panel product controls we will publish them on the websites.

Question 16:

I have received information from one of my colleagues in USA concerning implementation dates in EU. I would be grateful if you could clarify some details. 'Implementation date is 01 Mar 05 for all new WPM. However existing WPM in circulation or storage will not need to be regulated until Dec 2007.' Does this only relate to imports from USA or is it a general statement for imports worldwide?

Answer:

The answer is that it relates to imports of wood packaging material from any country that displays a treatment mark which does not incorporate the IPPC logo. Countries such as USA, Canada, Japan and China have been required to treat and mark all softwood wood packaging material entering the EU since 1st October 2001 in order to comply with Commission Decision 2001/219/EC.

The wood marks applied to wood packaging material manufactured before 28th February 2005, in order to meet the requirements of Commission Decision 219, will continue to be accepted by the EU on a temporary basis until 31 December 2007. After this date the wood packaging will have to be ISPM15 compliant in order to be accepted by the EU.