

October 2020

Brexit: your questions answered

What is ISPM15?

International Phytosanitary Measures 15 (ISPM15) is an international standard for the treatment of wooden packaging to help prevent the spread of pests.

It was developed by the International Plant Protection Convention (IPPC) to prevent the international transport and spread of disease and insects that could negatively affect plants or ecosystems. It applies to all wood packaging materials of a thickness greater than 6mm, and require it to be debarked and heat treated or fumigated with methyl bromide – and then stamped with a visible mark of compliance; this mark is a ‘passport’ that allows the packaging to move between countries across international borders.

More information about ISPM15 can be found here: www.ukwpmmp.org

What does this mean after Brexit?

The UK Government has stated that *“From 1st January 2021 it will be a legal requirement for all wood packaging material moving in both directions between UK and the EU to be compliant with a treatment and mark as specified in the International Standard for Phytosanitary measures No 15 (ISPM15).”*

Wood packaging material is currently permitted to move freely between most EU countries, so these rules previously did not apply to UK/EU movements, meaning no inspections are required between countries in the EU.

Because the UK is leaving the EU Customs Union, we become a ‘third-country’ - which means the UK will be subject to ISPM15 legislation and related border measures.

Additional inspections may be put in place to enforce ISPM15 as wood packaging material crosses UK/EU borders and penalties introduced on a local basis for non-compliance. These could include refusal to allow a shipment to enter a country or even destruction of the pallet and the goods on it.

Does Brexit increase the risk of timber related pests being transported on wood pallets and packaging?

Although the UK is leaving the EU this does not mean there is any greater risk of exporting pests between these two regions - there will be no change in the plant health risk embodied by movements of pallets and packaging.

The Timber Pallet and Packaging Confederation (TIMCON) therefore believes there is no scientific or fact-based rationale to justify any change in the rules or enforcement regimes applied to wooden packaging material (WPM). Our view is shared by packaging and other industry associations across Europe, including Logistics UK (formerly the Freight Transport Association), National Association of Pallet Distributors (NAPD), the European Federation of Wooden Pallet and Packaging Manufacturers (FEFPEB) and the Closed Pallet Pooling Coalition (CPPC representing CHEP, LPR and IPP).

Will there be a period of grace to phase in the new inspection regime?

TIMCON had asked for a 6-month extension beyond the 1st January 2021 to allow us to catch upon preparation time lost because of the pandemic. However, this was not accepted by UK negotiators because ISPM15 is seen as a sovereign issue and one of the EU legislative areas the UK wants to pull out of.

It is not yet clear how the inspection regimes will be implemented, although we are advocating that they will be carried out on a risk-based approach. However, you must nevertheless follow the law and ensure you are compliant.

It is the responsibility of the end user to ensure the timber packaging and pallets sourced meet the required phytosanitary standards - as set by the destination country of those goods.

TIMCON is recommending an aligned approach to inspections in all EU member states to reflect the risk-based approach to ISPM15 inspections already advocated by the UK Government. Such an approach is consistent with current EU legislation relating to ISPM15 and allows member states to continue this after 1st January 2021.

Our pan-EU industry has been mobilised to ask their National Plant Protection Organisations (NPPO) i.e. their Forestry Commission/Defra equivalents responsible for ISPM15 in their respective countries, to continue to take a risk-based approach to inspection, which each member state of the EU is allowed to do of its own volition.

What steps has the industry taken to prepare so far?

The pallet and packaging industry has been preparing for some time. Measures taken have included manufacturers increasing their heat-treating capacities with new investment in equipment; and increasing the capacity of current equipment - moving to 24/7 shift patterns, for example, which in many cases more than doubles capacity without major investment.

Work has also been carried out with the Forestry Commission, the UK Wood Packaging Material Marking Programme Advisory Council and the major pooling companies, allowing the use of heat-treated boards, so the entire pallet does not need to be retreated after it is repaired.

Has the pandemic affected industry preparations for Brexit?

Yes. Our industry, like many others, have lost seven months of preparation time during the first lockdown period. Coronavirus continues to provide challenges; however, our industry and employees have been officially designated as essential from the early phase of the pandemic, and all efforts have been made to keep vital supply chains moving. The same ethos now applies to Brexit.

Will I be able to get ISPM15 pallets from 1st January 2021?

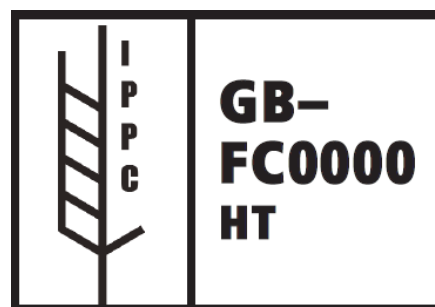
Whilst we cannot guarantee there will be no delays to the supply of pallets in the early part of next year, the industry has been working hard to be 100 per cent ISPM15 compliant. A recent industry survey issued by TIMCON indicates (as from 1st September 2020) that 76% of pallets and packaging manufacturers and suppliers of second-hand pallets are confident they will be able to meet demand.

We expect this figure to increase in the weeks ahead, and we continue to keep the pressure up reach as close to 100 per cent compliancy as possible by 1st January. We are confident of keeping customers supplied with ISPM15 compliant packaging from the 1st January and beyond and that by the middle of 2021 we will be as close to 100 per cent compliance as possible.

You should speak to your supplier in good time about your ISPM15 requirements.

Will my ISPM15 pallets need to be accompanied by a phytosanitary certificate at the border?

No. The stamp on the pallet (see example, right) is enough as it provides an audit trail to the manufacturer/repairer of the pallet. This must be clear and legible. If it is not, then the pallet is not considered compliant.



Can I use second-hand pallets that have ISPM15 marks from other countries, and send them back into the EU with my goods on?

Yes. Once a pallet has been treated to ISPM15 specifications, it can be sent around the world multiple times without the need for retreatment, unless it needs to be repaired. In the UK, if an ISPM15-compliant pallet needs repairing, the entire pallet needs to be re-heat treated once repaired and the original mark obliterated and replaced by the mark of the repairer.

To do this, the company doing the repairs needs to be registered on the UK Wood Packaging Material Marking Programme (UKWPMMP) that

regulates ISPM15 activity in the UK and be subject to its rules and legal obligations.

How will Brexit affect ISPM15 requirements for pallets moving within the UK?

ISPM15 does not affect pallets moving between England, Wales, Scotland or the Channel Islands. However, the pallet flow between the UK mainland – Northern Ireland – Republic of Ireland (and other permutations thereof) will need special attention. You can refer to the table below about these new ISPM15 requirements.

Origin	Destination	Via	HT needed?
EU	UK		✓
UK	EU		✓
Ireland	GB		✓
GB	Ireland		✓
N Ireland	Ireland		
GB	Ireland	N Ireland	✓
Ireland	GB	N Ireland	✓
GB	N Ireland		✓
N Ireland	GB		

As negotiations continue, we will advise if there are any changes that come about from the UK Internal Market Bill, or any other important developments.

A final word

Brexit and the pandemic have increased understanding amongst politicians, industry and even the public about the essential role the timber packaging and pallet industry has in the UK and EU. It is a key sector supporting the delivery of food, medicines and other essential goods to retailers, underlining the importance in ensuring no delays or supply chain issues surrounding the flow of goods.

Wooden packaging remains the most cost-effective method of transportation of goods and is recognised as one of the best examples of a circular economy in operation. It has unrivalled environmental and hygiene credentials - wood absorbs carbon from the atmosphere as it grows and locks it in until it reaches the end of its useful life; and is ultimately recycled.

It has been the preferred choice for many years - and will continue to be when the EU transition period ends on 1st January 2021.

TIMCON, along with the other associations and individual companies in the industry are keeping customers updated, reassured and supplied with our ISPM15 compliant products.

For more information, please contact TIMCON:

Email: info@timcon.org Tel: +44 (0)116 274 7357