

EPPO Workshop on ISPM 15 “Guidelines for Regulating Wood Packaging Material in International Trade”

The Workshop was attended by 55 participants from 16 EPPO member countries (Belarus, Czechia, Denmark, Estonia, Germany, Finland, Croatia, Hungary, Lithuania, Latvia, Netherlands, Norway, Russia, Spain, Sweden, Ukraine). The Workshop was opened by Mr Popovich (Federal Service for Veterinary and Phytosanitary Surveillance of Russia) and an overview of ISPM No.15 “Guidelines for Regulating Wood Packaging in International Trade” was given by Mr Larson (IPPC Secretariat).

Mr Larson recalled in particular that the ICPM had adopted the standard to introduce a single general measure to prevent the spread of pests associated with wood packaging. In particular ICPM members recognized that wood packaging is frequently made of raw wood that may not have undergone sufficient processing or treatment to remove or kill pests. Furthermore, the ICPM recognised that wood packaging is very often reused, recycled or re-manufactured and the true origin of any piece of wood packaging is difficult to determine and thus its phytosanitary status cannot be ascertained. Therefore the normal process of undertaking risk analysis to determine if measures are necessary and the strength of such measures was frequently not possible for wood packaging because its origin and phytosanitary status is often not known. He added that the ICPM members recognized that the standard did not provide 100 percent security but intended to eliminate the risk for most quarantine pests and considerably reduce the risk from a number of other pests that may be associated with that material. Some participants added that at the moment non-treated wood packaging was moving around the world and that the approved measure would necessarily reduce the risk of spread of pests.

8 EPPO member countries presented the stage of implementation of ISPM 15 in their countries in particular the programmes which have been put in place to ensure that wood packaging exported from their countries complies with ISPM N°15 requirements. Most countries attending the Workshop indicated that they were in the process of establishing programmes for the treatment of wood packaging. In most countries the programmes have a voluntary nature (presentation given at the workshop can be viewed on the EPPO website). In addition the workshop was informed of the Discussion Board set up to discuss problems of implementing ISPM n°15 "Guidelines for regulating wood packaging in international trade". It was mentioned that this Discussion Board was open to any interested person.

The main concerns raised during the meeting were the following:

Consistency of the Standard with the IPPC and the SPS agreement:

Some participants believed that the standard contradicted to the SPS agreement and IPPC and considered that before approved measures can be included in one's country legislation technical justification should be provided (including a list of quarantine pest supporting the measures adopted for different parts of the world)

It was recalled that the standard states that countries should have technical justification for requiring the application of the approved measures as described in the standard for imported wood packaging. Most participants stressed that the main reason for international measures was the difficulty of knowing the origin and phytosanitary status of wood. It was also stressed

that ISPM 15 says that “the NPPOs of importing countries should consider other arrangements for wood packaging associated with exports from any country (or particular source) where evidence is provided which demonstrates that the pest risk is adequately managed or absent (e.g. areas with similar phytosanitary situations or pest free areas)”. Such provisions may be used by exporting countries.

Marking of wood packaging

The Workshop noted that the standard indicates that the mark should at minimum include the ISO two letter country code followed by a unique number assigned by the NPPO to the producer of the wood packaging, who is responsible for ensuring that appropriate wood is used and properly marked. During the discussions, all participants from countries implementing a programme for wood packaging indicated that they had also allowed companies treating wood packaging and companies producing wood packaging from treated wood to use the mark.

It was mentioned that different national procedures had been developed and adopted for each different case. These procedures included inspection performed by the NPPO or independent inspection bodies under the supervision of the NPPO. The minimum involvement of the NPPO is auditing the independent body inspection system. Some countries reported legal difficulties in delegating some of their responsibilities to independent bodies.

It was suggested that the date of treatment of the wood packaging (month/year) should be included in the mark to allow better traceability. It may also be an important element to explain cases where wood packaging is found contaminated or re-contaminated with pests. Such a provision could also help to prevent fraud.

Some participants were concerned that it was very easy for a company to reproduce the mark and that a physical protection could have been included in the mark. Most participants insisted that inspection of wood packaging was one of the mechanisms to identify fraud. Communication between countries was also important (notification of cases of non-compliance associated with wood packaging). Some participants insisted that the possibility of falsifying the mark could result in trade barriers and responsibility disputes (when a non-compliant wood packaging, including wood packaging infested by a quarantine pest, could be linked to one country whereas it was marked in another country by a fraudulent company).

Marking of dunnage

Some participants indicated that container-loading companies may be allowed to mark dunnage during loading, provided that only treated wood is used. Others also use piece of wood marked every 10 cm. Participants from EU countries indicated that treated and marked dunnage will only be required from 2007 and that the only current requirement was debarking of wood.

Repairing of pallets

This was recognized as the most difficult issue. Participants were concerned that marked pallets with broken parts replaced with non-treated wood could move inside one country and still carry the IPPC mark. Some participants suggested that the IPPC mark should be deleted once the wood packaging was no longer compliant with treatment requirements.

Treatments of wood

During the meeting, some preliminary results on Gamma irradiation of wood from the Sankt Peterburg State Forest Technical Academy were presented. The IPPC Secretariat

representative explained that all experts working in forest quarantine were invited to join the International Forest Research Group. The IFQRG is an independent body that brings phytosanitary and scientific communities together for discussion and collaborative research on forest quarantine matters. Subcommittees of this group address subjects such as ionizing radiation, bark infestation research, fumigation and heat treatment, global interception database and implementation. He encouraged the Russian colleagues to communicate the results of these preliminary studies to this group.

The Workshop confirmed that there was a need for further research on alternative treatments for wood packaging due to the diminishing access to methyl bromide and as heat treatment was viewed as an expensive process.

Reinfestation of wood and debarking of wood

The main argument presented for requiring debarking of wood was the risk of re-infestation. Participants agreed that it could be a problem although treated-wood was not in general attractive to the insects concerned even if not debarked, but that a risk of reinfestation may exist in certain circumstances and that further research was needed.

Other issues

Questions on how NPPOs could cope with these new requirements were raised, in particular whether there had been an increase of staff to cope with the inspection requirements related the treatment and marking of wood packaging as some countries were confronted with legal difficulties to delegate the inspection work. Most participant from countries having implemented the standard explained that there had been no increase of staff in the NPPO.