ABN: 90153660836 25 Garden Drive Tullamarine Victoria Australia 3043 Telephone: +613 83367111 Fax: +613 93387935 Mobile: +61 (0) 413586186 Email: <u>Andrew@wcbm.com.au</u> www.wcbm.com.au



### Frequently asked questions about ISPM 15 Treatment certificate

### 1. What is ISPM 15?

ISPM 15 is the 'International Standards for Phytosanitary Measures Publication No. 15 (2009): Regulation of Wood Packaging Material in International Trade'.

### 2. Why was ISPM 15 developed?

ISPM 15 was developed to address the global spread of timber pests by regulating the movement of timber packaging and dunnage in international trade. ISPM 15 describes phytosanitary measures to reduce the risk of introduction and/or spread of quarantine pests associated with solid timber packaging material (includes dunnage).

### 3. Who developed and endorsed ISPM 15?

The United Nations Food & Agriculture Organisation (FAO) addresses plant quarantine through the International Plant Protection Convention (IPPC). The IPPC is an international treaty administered by the FAO and implemented through the cooperation of member governments. Australia is a member or 'contracting party' to the treaty.

As for all other ISPMs, the Secretariat to the IPPC coordinated the development and preparation of ISPM 15 over a period of time through an agreed and defined process of draft development and country consultation.

ISPMs are recognised as the basis for phytosanitary measures applied by members of the World Trade Organisation (WTO) under the Agreement on the Application of Sanitary and Phytosanitary Measures (the SPS Agreement). Australia has been a WTO member since 1995.

The Commission on Phytosanitary Measures (CPM) (provided for in a 1997 revision to the text of the IPPC) was established in 2006 and now serves as the global agreement's governing body. Members of the CPM are the contracting parties to the IPPC. As Australia is a contracting party to the IPPC, Australia is therefore a member of the CPM.

More detailed information on the CPM, the IPPC (including its relationship to international trade), and other international agreements is provided on the <u>International Phytosanitary Portal</u>, the official website for the <u>International Plant Protection Convention</u>.

Further information on the WTO and FAO including the SPS Agreement, is available from the <u>WTO</u> website.

### 4. What countries have implemented ISPM 15 for their exports?

Many countries, including Australia, have implemented systems to accept ISPM 15 compliant imports. However, this does not necessarily mean that these countries also have ISPM 15 programs in place for their exports. Australia has implemented ISPM 15 for their exports. Countries are not obliged to advise trading partners of their ISPM 15 export readiness so it is difficult to determine the ISPM 15 export readiness of various countries. However, the information that AQIS has obtained from the Internet is available at <u>International Implementation of ISPM 15</u> or alternatively, the National Plant Protection Organisation (NPPO) of the exporting country. NPPO contacts for each country are available on the <u>International Phytosanitary Portal</u>.

### 5. What is timber packaging and dunnage?

Packaging is used to support, protect or carry a commodity.

Packaging includes dunnage, pallets, crating, packaging blocks, drums, cases, load boards, pallet collars and skids, etc.

Packaging can be constructed of any number of materials including timber (or wood).

Dunnage is used to secure or support a commodity but does not remain associated with the commodity.

AQIS import requirements for packaging made of solid timber, plywood and/or veneer peeler core are provided in the AQIS publication 'Cargo Containers: Quarantine aspects and procedures'. The AQIS Import Conditions database, ICON, also provides import requirements.

For importation into Australia, packaging made from particleboard, chipboard, hardboard (masonite), oriented strand board, medium density fibreboard (MDF) or high density fibreboard (HDF) does not require treatment. More information on packaging made from these reconstituted wood products is available on the AQIS Import Conditions database, <u>ICON</u>. These products are deemed to pose minimal quarantine risk and can be released without inspection by AQIS and do not need to be declared on packing declarations.

### 6. What wood packaging material does ISPM 15 apply to?

ISPM 15 applies to coniferous (softwood) and non-coniferous (hardwood) raw wood packaging material. The standard does not apply to wood packaging made wholly of wood-based products such as plywood and veneer, reconstituted wood products (particle board, chipboard, hardboard (masonite) oriented strand board, high density fibre board, and medium density fibre board) or products created using glue, heat and pressure or a combination of these.

#### 7. Is the ISPM 15 import option mandatory for timber packaging entering Australia?

No. The ISPM 15 import option is one of a number of import options offered by AQIS for timber packaging. Importers are able to choose the import option that best suits their business needs. Further treatments are provided in the AQIS publication <u>'Cargo Containers: Quarantine aspects and</u> <u>Procedures'</u>

#### 8. Why does AQIS require imported timber packaging (including dunnage) to be free of bark?

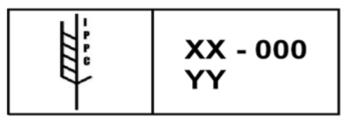
ISPM 15 requires all solid timber packaging must be made of debarked wood. Bark has the potential to contain numerous pathogens of quarantine concern. It also acts as a shelter site for insect pests and encourages post-treatment infestation by both insect and pathogen pests. The presence of bark also hampers inspection procedures and may reduce the effectiveness of methyl bromide fumigation. For these reasons, AQIS requires imported solid wood packaging material be free of bark, but allows a tolerance for small pieces of bark that have not been completely removed during milling — 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 (length × width) of an individual piece of bark less than 50 square cm.

However, if quarantine risk material is found associated with compliant pieces of bark, AQIS will continue to apply measures all at the importer's expense.

# 9. What does an ISPM 15 compliant stamp or mark look like? What do the symbols in the stamp mean?

Timber packaging and dunnage bearing the mark below is certified as having been subjected to an ISPM 15 approved treatment.

#### ISPM 15 mark



An ISPM 15 compliant mark must include:

- **IPPC** certification symbol.
- XX: represents the two letter ISO country code (e.g. AU for Australia, US for United States, NZ for New Zealand, GB for United Kingdom).
- **000**: represents the unique certification number issued by AQIS to the treatment provider or wood packaging manufacturer. Inclusion of this certification number ensures that the wood packaging material can be traced back to the treatment provider and/or manufacturer.
- **YY**: is the treatment abbreviation where:
  - HT is the code for heat treatment to a minimum of 56° C for a minimum of 30 minutes
  - MB is the code for methyl bromide fumigation.

No other information shall be contained within the border of the mark. If additional marks (e.g. trademarks of the producer, logo of the authorizing body) are considered useful to protect the use of the mark on a national level, such information may be provided adjacent to but outside of the border of the mark.

#### 10. Where should ISPM 15 marks be located on timber packaging?

To aid in validation inspections, ISPM 15 compliant marks should be clearly visible and AQIS recommends that they appear on at least two opposite sides of the article being certified. To be ISPM 15 compliant only one mark is required.

Where various components are integrated into a unit of wood packaging material, the resultant composite unit should be considered as a single unit for marking purposes. On a composite unit of wood packaging material made of both treated wood and processed wood material (where the processed component does not require treatment), it may be appropriate for the mark to appear on the processed wood material components to ensure that the mark is in a visible location and is of a sufficient size. This approach to the application of the mark applies only to composite single units, not to temporary assemblies of wood packaging material.

Where ISPM 15 stamped timber is used as dunnage and is cut to final length at the time of lading, marks should be in frequent, multiple applications along the entire length of the wood intended for use as dunnage. The wood may be then cut to a size where at least a single mark (preferably two marks) may remain present

# on the cut portion. Pieces should not be used if they are cut to a size such that the piece does not retain a single entire visible mark.

The marks must be permanent and not transferable. Hence metal plates and stickers are not acceptable. In addition, ink and paint stamps have proven to be non-permanent as many stamps entering Australia have become illegible during transport. AQIS therefore recommends the use of heat branding.

# **11.** Do the ISPM 15 approved measures of heat treatment and methyl bromide fumigation offer permanent protection to timber packaging against timber and non-timber pests?

Neither of the ISPM 15 approved measures offers permanent protection against post-treatment infestation of timber packaging by timber and non-timber pests. The treatments only control pests present at the time of treatment.

#### 12. Do AQIS procedures addressing Giant African Snail remain unchanged?

Yes. Whilst AQIS accepts timber packaging marked with ISPM 15 compliant stamps from all countries including GAS countries, AQIS import requirements that address the GAS risk remain unchanged. This is because ISPM 15 treatments only address quarantine concerns that are present at the time of treatment, not the risks of post-treatment infestation or 'hitch-hiker' pests (pests not associated with particular commodities). As GAS is a 'hitch-hiker' pest, ISPM 15 treatments do not address AQIS concerns and AQIS import requirements that address GAS risk remain unchanged.

# 13. Does the AQIS '21 day rule' apply to solid timber packaging marked with ISPM 15 compliant stamps?

#### Whether or not the 21 day rule applies depends on the circumstances:

Yes, if none of the timber packaging (including dunnage) in a consignment is marked with ISPM 15 compliant marks and the timber packaging material has been treated offshore. Import conditions require treatment to be applied within 21 days of shipping (this is extended to 3 months for certain countries).

Yes, if some of the timber packaging in a consignment is marked with ISPM 15 compliant marks and some is not marked with ISPM 15 compliant marks, a packaging declaration and other evidence of treatment is required and the '21 day rule' as described above applies to the entire consignment.

No. If all timber packaging in a container is marked with ISPM 15 compliant stamps, the '21 day rule' does not apply.

#### 14. Can I re-use solid timber packaging marked with ISPM 15 compliant stamps?

According to the ISPM 15 standard, ISPM 15 marked solid timber packaging (includes dunnage) may be used again, but if exported from Australia, it is the exporter's responsibility to ensure that it meets the requirements of the importing country.

#### 15. Does AQIS monitor imported timber packaging marked with ISPM 15 compliant stamps?

Yes. AQIS is conducting surveillance on imported timber packaging as part of Australia's performance assessment of ISPM 15. The performance assessment of ISPM 15 will contribute to Australia's input into the technical review of this standard by the International Forestry Quarantine Research Group.

# 16. Can untreated timber, without ISPM 15 marks or evidence of other treatment, be separated from the goods to facilitate clearance?

Consignments that contain untreated timber packaging and no other quarantine concerns may be transported to a Quarantine Approved Premises and the goods separated from the timber packaging to allow clearance. Timber packaging will be subject to treatment, export or destruction at the importer's expense.

#### Import conditions for Containerised Sea Cargo

# 17. What treatments does AQIS accept for solid timber packaging associated with containerised cargo?

AQIS has long regulated imported timber packaging (including dunnage) and over time has approved a number of treatments. AQIS commenced accepting timber packaging marked with ISPM 15 compliant stamps on 1 September 2004. All AQIS approved treatments are outlined in the AQIS publication 'Cargo Containers: Quarantine aspects and procedures' and on the AQIS Import Conditions database (ICON).

If timber packaging (including dunnage) has been subjected to an ISPM 15 approved treatment, AQIS requires the timber packaging to be marked with ISPM 15 compliant marks to be granted quarantine clearance without any further quarantine intervention.

**NB:** Timber packaging marked with ISPM 15 compliant stamps is considered acceptable under existing Australian compliance agreement arrangements such as the Containerised Cargo Clearance Scheme.

AQIS offers a number of clearance mechanisms for containerised consignments that have been treated offshore. These include clearance on the basis of a treatment certificate and/or a packaging declaration. The full details of these clearance mechanisms can be found at – <u>www.aqis.gov.au/icon</u>. Search ICON for "Timber Packaging and Dunnage" to find out more.

# 18. When can timber packaging associated with containerised cargo be granted quarantine clearance based on a packing declaration?

**a**) If ALL timber packaging in a consignment is marked with ISPM 15 compliant stamps, and is compliant with the bark tolerance limits of ISPM15 and no other quarantine concerns exist (e.g. the presence of straw, contamination, etc.); **OR** 

**b**) If ALL timber packaging in a consignment is covered by treatment certification acceptable to AQIS, and is compliant with the bark tolerance limits of ISPM 15 and no other quarantine concerns exist (e.g. the presence of straw, contamination, etc.). This option is applicable regardless of whether any timber packaging in the consignment is marked with ISPM 15 compliant stamps.

If a packing declaration or treatment certification is unacceptable to AQIS, importers are offered options to facilitate clearance such as treatment, export or destruction. All are conducted at the importer's expense. Timber packaging eligible for quarantine clearance based on documentation alone will be subject to surveillance by AQIS to ensure compliance.

### 19. What treatment options are available for timber packaging and dunnage?

All timber packaging will be required to be either compliant with ISPM 15, or have evidence of acceptable offshore treatment provided otherwise the timber packaging will be subject to onshore treatment, export or destruction.

For containerised sea cargo, a packaging declaration will continue to be used as a risk profiling tool and the means to determine whether or not ISPM 15 compliant wood packaging has been used.

#### 20. Where can I obtain an example of an AQIS Packing Declaration?

Packers/suppliers of containerised cargo need to complete a Packing Declaration if an importer chooses to utilise the facilitated quarantine clearance system for timber packaging associated with containerised cargo.

For information on packing declaration requirements, including examples of packing declarations, please see **Documentary Requirements**.

ISPM 15 Packing Declarations are only required if timber packaging used within a containerised consignment is marked with ISPM 15 compliant stamps and the importer elects for quarantine clearance of the packaging based on documentation alone.

#### Air and Break Bulk Cargo

# 21. Will Packing Declarations be required for timber packaging and dunnage used in supporting air and break bulk cargo?

No. Until a broker accreditation type arrangement can be developed there will be no need to present documents to AQIS unless surveillance detects non-compliance and importers do not wish the consignment to be treated onshore.

# 22. How will AQIS know if timber packaging has been used? Airfreight consignments currently don't require documents to indicate what kind of packaging has been used.

Until a broker or industry accreditation arrangement is in place for timber packaging associated with air cargo it will be assumed by AQIS that any timber packaging is compliant with standards until AQIS has evidence to the contrary. AQIS will rely on its normal surveillance mechanisms to determine whether or not ISPM 15 compliant timber packaging has been used. It is the importer's responsibility to ensure that all packaging is compliant with AQIS requirements.

#### 23. What will the importers or their agents be responsible for?

The importers or their agents will only have additional responsibilities if existing AQIS surveillance detects non-compliance with the ISPM 15 standard. Timber packaging that is not marked with ISPM 15 marks will be sent for treatment, export or destruction unless evidence of valid offshore treatment can be presented to AQIS front counters. These treatments will be at the importer's expense. It is the responsibility of importers to ensure that packaging is compliant with AQIS requirements.

# 24. Is there any barrier question, non-conformity or penalty system for brokers with regards to packing declaration?

No, for Air and Break bulk cargo only, brokers will not be asked the barrier question in ICS "Do all FCL/X containers on this declaration meet AQIS non-commodity requirements and are they all designated to be unpacked in a metropolitan postcode or inside the boundary of an approved AQIS port?" In the advent of non-compliant packaging material, the absence of packaging and treatment certificates for air and break bulk will not result in non-conformity penalties under the Broker Accreditation Scheme. However, goods will be subjected to onshore treatment, destruction or exportation at the importer's expense when AQIS surveillance identifies quarantine concerns.

### 25. Will wood packaging attached to break bulk timber bundles/packs be required to be ISPM 15 compliant?

As ISPM 15 compliant timber packaging can be reused, may have a long service history and is typically made from low grade timber it is considered by AQIS to be of higher quarantine risk than most commercially imported timber. Gluts are also typically comprised of low grade timber with a higher pest risk. With the exception of stickering or gluts of the same grade as the timber, any timber packaging and dunnage must be compliant with ISPM 15 or evidence of other acceptable treatment provided.

### 26. Unaccompanied Personal Effects (UPEs)

UPEs undergo 100% inspection which includes any timber packaging. If any bark is not compliant with the bark tolerance limits of ISPM 15 or contamination or infestation is detected, the packaging will be directed for appropriate treatment at the importers expense.

# 27. Where can I find information relating to ISPM 15 for exports or Australian Wood Packaging Certification Scheme?

This can be found on the AQIS website in Exporting from Australia and ISPM 15 for Exports.