

M 015-06

steamship association of louisiana

(Formerly known as the New Orleans Steamship Association)

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April 24, 2006

TO: ALL MEMBERS

RE: UPDATE ON WOOD PACKAGING MATERIAL (WPM) ENFORCEMENT

Under the International Standards of Phytosanitary Measures Rule 15 (ISPM 15), full enforcement for all WPM, including dunnage being imported into the United States, is set to begin on July 5, 2006. Enforcement for pallets and crates began on February 1, 2006. SALA recently submitted ISPM 15 enforcement questions to both Customs and Border Protection (CBP) and USDA/APHIS national contacts. Those questions and the initial reply are attached. In an attempt to get clarification, SALA recently chaired a National Association of Maritime Organizations (NAMO) sponsored conference call with the involved government agencies. The minutes from that meeting are also attached for your reference. This conference call helped establish several improvements that will serve to help shippers and CBP with enforcement. Based on these questions and several comments submitted by SALA, the FAQ made available through CBP's website has been updated. To view the FAQ, please click [here](#). SALA's main concerns involve mold growth on heat-treated WPM, marks smeared due to handling and exposure to moisture, the difficulty in associating WPM on the dock with the country of origin of the cargo, and a conflict between the old APHIS practices for discharging dunnage and the ISPM 15 standards.

Several scientific studies have concluded that heat treating WPM produces conditions favorable to the growth of mold. The heat treatment procedure rapidly removes moisture from the WPM. This process produces ideal conditions for mold growth when WPM is exposed to moisture after heat treatment, as on a dock or in a ship's hold. To review the coverage of this topic as offered by the UK P&I Club, please click [here](#). SALA requests our members alert us to any experience with mold on heat-treated WPM, as well as on any other issues or questions associated with ISPM 15.

Suggestions to decrease the mold risks include the use of forced air to circulate and help keep the WPM exterior dry after treatment and while in the ship's hold. More radical and expensive options would be to apply mildicides, such as copper-8-quinolinolate and copper naphthanate after heat treatment, and to add dehumidifiers to ship holds.

SALA has documented several cases of smeared marks on compliant WPM, and we posted a question to CBP about their position on this matter. As with the mold issue, the moisture in the air or in the ship's hold, coupled with normal gear handling and friction between cargo and other pieces of dunnage, often smears the IPPC stamps. In the original answers, CBP stated that if the mark was not legible, it would be ruled non-compliant. In the recent conference call, CBP acknowledged that, based on this question, CBP Officers would be directed to use their discretion in such cases. This aligns CBP's position more closely to that offered on cut dunnage that is not

marked because the marks are on the ends of the wood. CBP will be advising their inspectors to use their discretion with smeared marks and on cut dunnage that is not marked. CBP wanted to avoid calling this a percentage allowance. If the uncut WPM in the same shipment is stamped, the cut WPM would mostly likely be ruled as compliant. Thus, smeared marks should be acceptable if most of the stamps were legible. This, again, is up to the agricultural officer's discretion.


Prior to the conference call, the determination for the origin of dunnage post-discharge was to be associated with the country of origin to the cargo. SALA explained that this could cause problems when the inspection is done after the cargo is discharged when WPM of U.S. origin was used by stevedores to store cargo on the dock or in barges. At this point, CBP offered that certain situations could not be accounted for in advance, though this situation is being taken into account. Discretion might allow for considering such things as recent dunnage invoices used to verify the WPM origin.

The conflicting position between an old APHIS regulation and ISPM 15 regarding WPM being discharged from a vessel was discussed during the conference call. The Ship Inspection Report completed by CBP's agriculture inspectors require the following:

"SAFEGUARD NOTICE: While this vessel is in the territorial limits of the United States, no crew member or other person shall remove any of the following items except by specific permission by an Agricultural Officer....(4) hay, straw, rice hulls, hold sweepings or dunnage:....."

While ISPM 15 allows for WPM to be unloaded from the vessel if properly treated and marked without prior notification of CBP or APHIS, the rule of thumb, until ISPM 15 enforcement begins for all WPM, is that properly stamped WPM can be discharged without prior approval. As noted above, permission must be granted by an agricultural officer before discharging unmarked WPM. Once full enforcement begins on July 5, 2006, unmarked WPM should not be removed from a vessel.

SALA also submitted the attached suggestions to the U.S. National Plant Protection Organization (NPPO) contact in time to be considered for ratification by the International Plant Protection Convention. SALA does not have any feedback on these comments at this time, though we will continue to keep our members up to date.


Sean M. Duffy, Sr.
General Manager

Attachments