

APHIS, Industry Prepare for New Wood Packaging Material Requirements

In September of last year, the Animal and Plant Health Inspection Service (APHIS) issued a Final Rule amending the regulations for the importation of un-manufactured wood articles which goes into effect September 15th of 2005. Adopting to an international standard entitled, "Guidelines for Regulating Wood Packaging Material in International Trade," the agency will require that wood packaging material either be heat treated to a minimum wood core temperature of 56 degree Celsius for a minimum of 30 minutes or fumigated with methyl bromide, and marked with an approved international mark certifying treatment.

Basis for Regulating: Wood packaging material is frequently made of raw wood that may not have undergone sufficient processing or treatment to remove or kill pests and therefore becomes a pathway for the introduction and spread of pests. Furthermore, wood packaging material is very often re-used, recycled or re-manufactured (in that packaging received with an imported consignment may be re-used to accompany another consignment for export).

The true origin of any piece of wood packaging material 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 is frequently not possible for wood packaging material. For this reason, this standard describes globally accepted measures that are approved and that may be applied to wood packaging material by all countries to practically eliminate the risk for most quarantine pests and significantly reduce the risk from a number of other pests that may be associated with that material. National Plant Protection Organizations (NPPOs) are encouraged to accept wood packaging material that has been subjected to an approved measure without further requirements. Such wood packaging material includes dunnage, but excludes processed wood packaging material.

Procedures to verify that an approved measure has been applied, including the application of a globally recognized mark, should be in place in both exporting and importing countries. Other measures agreed to under a bilateral arrangement are also considered in this standard. Wood packaging material that does not comply with the requirement of this standard should be disposed of in an approved manner.

Disposal: Disposal of wood packaging material is a risk management option that may be used by the NPPO of the importing country upon arrival of the wood packaging material where treatment is not available or desirable. Recommended methods of disposal include incineration, burial, processing or other methods endorsed by the NPPO as effective for the pests of concern. Wood packaging material that requires emergency action should be appropriately safeguarded prior to treatment or disposal to prevent escape of any pest between the time of the detection of the pest posing the treat and the time of treatment or disposal.

Regulated Wood Packaging Material: These guidelines are for coniferous and non-coniferous raw wood packaging material that may serve as a pathway for plant pests posing a threat mainly to living trees. They cover wood packaging material such as pallets, dunnage, crating, packing blocks, drums, cases, load boards, pallet collars and skids which can be present in almost any imported consignment, including consignments which would not normally be the target of phytosanitary inspection.

Wood packaging made wholly of wood-based products such as plywood, particle board, oriented strand board or veneer that have been created using glue, heat and pressure or a combination thereof should be considered sufficiently processed to have eliminated the risk associated with the raw wood. It is unlikely to be infested by raw wood pests during its use therefore should not be regulated for these pests.

Measures for non-compliance at point of entry: Where wood packaging material does not carry the required mark, action may be taken unless other bilateral arrangements are in place. This action may take the form of treatment, disposal or refused entry. Where the wood packaging material does carry the required mark, and evidence of live pests is found, action can be taken. These actions may take the form of treatment, disposal or refused entry. The NPPO of the exporting country should be notified in cases where live pests are found, and may be notified in other cases.

The Department of Homeland Security U.S. Customs and Border Protection officers will be enforcing these requirements. For questions or further information contact Hal Fingerman, Chief of Agriculture Operations, CBP at 215-597-4515 ext. 5 or email Hal.Fingerman@dhs.gov.