ISPM 15 – History
Brent Larson, Standards Officer, IPPC

APPPC/NPPO joint Workshop
ISPM 15 : Regulation of Wood Packaging Material in International Trade

10-14 June 2014, Beijing, China
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Need for a standard

• Wood boring pest interceptions
• Surveillance and monitoring programmes linked interceptions to wood packaging material
• Experts met several times and developed a draft ISPM
• Draft ISPM presented to ICPM-4 (2002)
Last minute Negotiations at ICPM-4 (2002)

- Debarking removed - technically justified?
- Concerns on the efficacy of methyl bromide in relation to pinewood nematodes
- Concern about promoting methyl bromide but reference to Montreal Protocol was not removed
ISPM 15 mark

The mark should at minimum include the:
- symbol
- ISO two letter country code followed by a unique number assigned by the NPPO to the producer of the wood packaging material, who is responsible for ensuring appropriate wood is used and properly marked
- IPPC abbreviation according to Annex I for the approved measure used (e.g. HT, MB).
Addressing concerns on the symbol

- A company in the USA claimed the symbol was already in use so IPPC Secretariat suggested countries temporarily suspend the implementation of the ISPM 15: 2002
Addressing concerns on efficacy

- North American Forestry Commission
- International Forest Quarantine Research Group (IFQRG)
- ICPM-5 (2003) requested the IFQRG to review data provided by the Republic of Korea and China
- IFQRG coordinated research on methyl bromide
New ISPM 15 symbol

- New symbol design, FAO registered under the Madrid Agreement (MA) and in some countries not party to the MA
- Limited resources: symbol was only registered in 82 countries in 2004.
ICPM-6 (2004) established Technical Panels:

• Technical Panel on Forest Quarantine (TPFQ)
  ➢ Work on the development of ISPM 15
  ➢ Practical application of treatments

• Technical Panels on Phytosanitary Treatments (TPPT)
  ➢ Review treatment efficacy using ISPM 28
    (Phytosanitary treatments for regulated pests)
IPPC workshop on the practical application of ISPM 15

28 February-4 March 2005, Vancouver, Canada

• Over 170 delegates participated:
  • reviewed ISPM 15 requirements
  • toured approved facilities
  • each delegate developed an implementation plan.
IPPC workshop on the practical application of ISPM 15

- Workshop proceeding are available on the IPP: https://www.ippc.int/core-activities/capacity-development/ippc-workshop-practical-application-ispm-no-15vancouver-canada-28-february-4-march-2005
ISPM 15 implementation issues

- Issues were raised on implementation
- IFQRG set up a list serve for Q & As
- Some issues raised, indicated that ISPM 15 should be revised
- CPM-1 (2006) added the revision of ISPM 15 to the IPPC List of topics for standards
- TPFQ began the revision
Revised Annex 1 on treatments

• CPM-1 (2006) adopted a revised Annex 1: Approved measures associated with wood packaging material to address the concerns regarding the methyl bromide (MB) fumigation
  • provided more guidance
  • fumigation schedule was changed
CPM Recommendation

- Use of methyl bromide for quarantine purposes is allowed under the Montreal Protocol
- IPPC criticized by the world for promoting methyl bromide use but in reality there was always an alternative treatment
- CPM-3 (2008) adopted a CPM recommendation on: *Replacement or reduction of the use of methyl bromide as a phytosanitary measure*
Revised ISPM 15

- CPM-4 (2009) adopted a revised ISPM 15: *Regulation of wood packaging material in international trade*
Issues addressed in the 2009 adopted ISPM 15

- reuse and remanufacture
- bark risks, specifically defining what size of bark was most risky
- removal of bark was added
- more guidance on the application of treatments
- criteria for new treatments removed (under revision)
- increased guidance on the use of the mark
ISPM 15 mark

Required components of the mark:
- the symbol
- a country code
- a producer/treatment provider code
- a treatment code using the appropriate abbreviation according to Annex 1 (HT or MB).
More specific guidance on the use of the ISPM 15 mark

- legible to inspectors without the use of a visual aid
- durable and not transferable
- rectangular or square
- no other information within a border line
- not hand written
- some flexibility allowed
Examples of the ISPM 15 mark
Protection of the symbol

• FAO has now registered the symbol in 114 countries
• In 2014 FAO has requested the registration in 19 more countries
• Each year, with limited resources, FAO continues the registration process
• IPPC welcomes commitments to reimburse FAO for registration costs
Usage Rules

• FAO as owner of the symbol has established usage rules
• FAO has authorized NPPO to use of the symbol in the ISPM 15 mark when implementing ISPM 15
Compliance

• FAO has delegated the NPPO as the authority to authorize and monitor the national use of the symbol in the ISPM 15 mark
• If misuse is discovered, NPPOs may request FAO to send a “Cease And Desist” letter to the offending party
Prosecution

• If the “Cease And Desist” letter does not bring about compliance NPPOs may request advice from FAO legal services
• The NPPO (or Contracting Party) may request authority to prosecute on behalf of FAO, this needs to be done in consultation with FAO Legal Services and at the costs are covered by the NPPO
An additional treatment added

CPM-8 (2013) adopted an additional treatment which was included in Annex 1. Approved treatments associated with wood packaging material

- a heat treatment using dielectric heating (DH)
- CPM-8 requested guidance on the application of this treatment be developed
Explanatory document

• First ISPM 15 explanatory document was produced by Shane Sela
• In 2014, in consultation with the TPFQ, a revised explanatory document was produced by Shane Sela, lead author, Thomas Schroeder, Matsui Mamoru and Michael Ormsby
• Explanatory documents are published on the IPP: https://www.ippc.int/publications/regulation-wood-packaging-material-international-trade-0
Guidance Documents

• IPPC Secretariat has developed specific guidance on the use of dielectric heating, information can be found on the IPP http://www.phytosanitary.info/

• *Dielectric Heating* - a quick guide to Dielectric Heating as treatment for wood packaging material, posted on the IPP:
Dielectric Heating- a quick guide to Dielectric Heating as treatment for wood packaging material
Possible new treatments

• In 2006 and 2007 the IPPC Secretariat made a call for treatments wood packaging treatments

• Six treatments for wood packaging were submitted:

  • Ecotwin
  • Microwave
  • Phosphine

  • Sulfuryl fluoride
  • Methyl iodide
  • Hydrogen cyanide (HCN)
TPPT reviewed treatment submissions

For most submissions there was:

• insufficient information on the numbers of pests tested
• efficacy level of the treatment against the target pest could not be determined
• the most resistant life stage was not determined
• life stages most likely to be present at the time of treatment was not determined
• no statistical support
TPPT requested additional information

Submitters, in most cases were not able to provide the TPPT with sufficient information.

Only two proposed treatments were considered further:
- Microwave heat treatment
- Sulfuryl fluoride
Microwave heat treatment

- Microwave changed to dieletric heating
- Adopted by CPM-8 (2013)
- Treatment code = DH
Sulfuryl fluoride

• Additional information is still being considered by the TPPT
Equivalence

First international recognition of equivalence for treatments:
- Fumigation by methyl bromide (MB)
- Treatment by heat (HT) or
- Dielectric heating (DH)

Also recognized the ISPM 15 mark as a way to prove a phytosanitary measure had been applied
New treatment criteria

- Criteria for ISPM 15 treatments was vague
- CPM decided to revise the criteria
- Part of ISPM 15 revision: *Criteria for treatments for wood packaging material in international trade* (2006-010)
- TPFQ are currently developing, pending IFQRG publication on the “Cardiff Protocol”
New treatment criteria (Cont.)

- TPFQ are revising based on research coordinated by IFQRG
- Once adopted this new criteria will be used by the TPPT and TPFQ to evaluate ISPM 15 treatment submissions
Conclusions

• The first and possibly the last case where the Appropriate Level of Protection is globally harmonized
• Huge impact on protecting trees and forests
• Equivalence
• Raised the profile of the IPPC
• Well worth the effort
• Need to focus on proper implementation
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ISPM 15
Scientific Technical Issues

Dr. Eric Allen
Canadian Forest Service
Natural Resources Canada

June, 2014
NAPPO – APPPC
ISPM 15 Workshop
Beijing, China
Overview of ISPM science issues

- Economic damage caused by pests
- Pest interceptions on treated wood packaging
- Scientific basis of treatments
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- Economic damage caused by pests
- Pest interceptions on treated wood packaging
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How can science help make improvements to ISPM 15?
International Forestry Quarantine Research Group

• Advisory body to the IPPC providing scientific analysis and review of global phytosanitary issues and new information

• Identify and undertake collaborative scientific research aimed at high priority forestry quarantine questions
Pest Risks Reduced by ISPM 15

Before ISPM 15:

- Untreated wood with bark
- Cable spools: 25% with live insects
Quarantine rearing of spruce bolts used to brace granite blocks

Fungi, nematodes, and insects (2408 of 28 species)
Major pest groups intercepted in wood packaging

**Cerambycidae**
- wood borers

**Siricidae**
- wood wasps

**Buprestidae**
- metallic wood-boring beetles

**Bostrichidae**
- dry wood beetles

**Scolytinae**
- bark and ambrosia beetles

- Bursaphelenchus xylophilus
- Dendroctonus ponderosae
- Ophiostoma spp

- Monochamus galloprovincialis
- Agrilus planipennis
- Lyctus brunneus
- Sirex spp.
Bark beetles and wood borers commonly intercepted and are known to be serious quarantine pests

21 species of Scolytinae and Cerambycidae established in the US from 1909–2008

• IFQRG bark infestation study results (UK, US, Germany, Canada)

Bark less than 3 cm wide or 50 square cm are very low risk
  • too small for insects to complete life cycle
  • dries quickly to become undesirable for insects

This led to changes in 2009 revision to ISPM 15
Bark patch size on area required for survival

*Ips typographus*

*Polygraphus poligraphus*

*Pityogenes chalcographus*

Gallery diagrams from Chararas (1962)
Canadian evaluation of SWP in containers

Live insects were found in 2% of the containers

<table>
<thead>
<tr>
<th>Treatment</th>
<th>% with insects</th>
</tr>
</thead>
<tbody>
<tr>
<td>MBr</td>
<td>30</td>
</tr>
<tr>
<td>HT</td>
<td>46</td>
</tr>
<tr>
<td>No IPPC stamp</td>
<td>23</td>
</tr>
<tr>
<td>Unknown</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td>100</td>
</tr>
</tbody>
</table>
Analysis of interceptions based on wood packaging type

Scolytinae interceptions (n=1105) 1950-2000 - NZ MAF
Analysis of interceptions based on wood packaging type

2011
N=192

2012
N=231

2013
N=261

EUROPHYTE data
29 EU member states
Economic damage caused by pests

Several recent studies:

Aukema et al. 2011. Economic Impacts of Non-Native Forest Insects in the Continental United States

<table>
<thead>
<tr>
<th>Annual Wood Borer Damage ($US x 10^6)</th>
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<tbody>
<tr>
<td>Federal Government</td>
</tr>
<tr>
<td>Local government</td>
</tr>
<tr>
<td>Household</td>
</tr>
<tr>
<td>Property loss</td>
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<td>Forest timber loss</td>
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<td>Total</td>
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McKenny et al. 2013. Estimates of the potential cost of *emerald ash borer* (*Agrilus planipennis*) to Canadian municipalities

The researchers estimated costs associated with mortality of street and homeowner trees over 30 years and concluded:

“damage was estimated from $265 - $1,177 million depending on the combination of spread, treatment, and discount rates”
Leung et al. 2014. Pathway-level risk analysis: the net present value of an invasive species policy in the US.

The researchers integrated estimated damage costs with policy implementation costs (treatment, trade effects) and concluded:

“Implementation of ISPM 15, although costly and yielding only moderate protection, can generate >US$ 11 billion in cumulative net benefits by 2050”
Brockerhoff et al. (2014) modelled pest arrival rates and probability of establishment. Species with low arrival rates are more likely to be mitigated than those with more frequent arrival.
Establishments will still occur, especially with high-arrival rate pests, even when entry rates are lowered 50-75%.
Haack et al. 2014. Effectiveness of the international phytosanitary standard ISPM No. 15 on reducing wood borer infestation rates in wood packaging material entering the United States.

Comparing pre- and post-ISPM 15 interception rates:

<table>
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<tr>
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0.1% x 13 million containers = 13,000 with live pests
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0.1% x 13 million containers = 13,000 with live pests

Why are live pests still moving with ISPM 15-marked wood packaging?
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Possible reasons:

• Pest tolerance of treatment
Why are live pests still moving with ISPM 15-marked wood packaging?

Possible reasons:

• Pest tolerance of treatment
• Infestation following treatment
Why are live pests still moving with ISPM 15-marked wood packaging?

Possible reasons:

• Pest tolerance of treatment
• Infestation following treatment
• Treatment not applied properly
Why are live pests still moving with ISPM 15-marked wood packaging?

Possible reasons:

• Pest tolerance of treatment
• Infestation following treatment
• Treatment not applied properly
• Fraud

Careful analysis of interceptions can help focus efforts to improve the effectiveness of ISPM 15
Scientific Basis of Treatments

Fumigation – methyl bromide

Exposure to methyl bromide is lethal to life stages of most living organisms

- 60 years of data showing MB use for wood products
- Effective for insects, fungi, nematodes
- Treatment success dependent on proper application
  - temperature, wood thickness, maintaining fumigant concentration
- Alternative fumigants being assessed
Exposure to high temperatures (50-60°C) is lethal to most living organisms

56°C for 30 min

- 80 years of data showing HT efficacy
- 1991 study - pinewood nematode and most adult and larval stages of insects
- recent research - wide range of decay and stain fungi
- outside of wood receives higher temperature, longer time
Heat treatment studies on fungi

Leptographium wingfieldii
### Maximum survival temperature for fungi (30 min exposure)

<table>
<thead>
<tr>
<th>Fungus</th>
<th>Temperature</th>
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</thead>
<tbody>
<tr>
<td><em>Leptographium wingfieldii</em></td>
<td>51°C</td>
</tr>
<tr>
<td><em>Leptographium wageneri</em></td>
<td>46°C</td>
</tr>
<tr>
<td><em>Ophiostoma polonica</em></td>
<td>46°C</td>
</tr>
<tr>
<td><em>Ceratocystis fagacearum</em></td>
<td>46°C</td>
</tr>
<tr>
<td><em>Armillaria ostoyae</em></td>
<td>51°C</td>
</tr>
<tr>
<td><em>Heterobasidion annosum</em></td>
<td>46°C</td>
</tr>
<tr>
<td><em>Phellinus noxius</em></td>
<td>51°C</td>
</tr>
<tr>
<td><em>Gloeophyllum sepiarium</em></td>
<td>66°C</td>
</tr>
<tr>
<td>Thermotolerant, non-quarantine pest</td>
<td></td>
</tr>
</tbody>
</table>
Effective Heat Treatment Approaches

- Different approaches to heat treatment monitoring
  - Ensuring consistent delivery of heat to all pieces of wood
  - Single or multiple probes
  - Kiln schedules (Canadian approach)
- Where heat chambers operate at ambient temperatures higher than 56° outer parts of wood achieve much higher temperatures
- Thermal models predict temperature throughout wood

![Graph showing temperature over time with key temperatures highlighted.]

Hours with wet bulb temp above:
- 133°F (56°C) - 18 hours
- 160°F (71°C) - 13 hours
Temperature profile of *Pinus* sawn wood at the end of a 509 minute schedule. Generally this temperature maintained for a further 30+ hr.
Summary

- Quarantine pests moving with wood packaging are known to cause significant social, ecological and economic impacts.
- Implementation of ISPM 15 is shown to have net economic benefit over time
- Fumigation and HT treatments are effective for most pests when applied correctly
- Compliance with ISPM 15 will lower pest arrivals and subsequent establishments but some will still occur.
The ultimate goal of ISPM 15, reducing pest establishments, can be improved by:

• Ensuring that new treatments are effective, especially against high arrival-rate pests
• Improved application of treatments
• Improved systems to ensure that treatments are properly applied

What next?
ISPM 15
Technical Issues

Dr. Eric Allen
Canadian Forest Service
Natural Resources Canada

June, 2014
NAPPO – APPPC
ISPM 15 Workshop
Beijing, China
Practical guidance on the implementation of ISPM 15

Shane Sela
APPPC-NAPPO Workshop on ISPM 15
June 10 – 15, 2014, Beijing, China
Scope

- Overview of the standard
- Authorisation of compliant exports
- Import control
- Applying the treatments
Overview of the standard

- Harmonized requirements ensure predictable, safe trade
- Basis of the standard:
  - Official treatment & marking
  - NPPO import system
- Certification should be the basis for entry and ongoing use
- NPPOs may undertake Pest Risk Analysis (PRA) to support additional measures if required
- 3 treatments internationally recognised
- Non-compliance should be reported in keeping with ISPM 13
Regulated commodities

- Dunnage
- Pallets
- Load boards
- Spools
- Crates
Exempt commodities

Plastic and oriented strand board

Thin wood

Wood shavings [cepolina.com]

Plywood

Wine barrels [cecilswine.com]
Elements of an official production system

- Legislative tools to support authorisation and control
- Systems to verify elements of certification (debarking, treatment and marking)
- Producer systems to ensure compliance with standard:
  - Treatment system
  - Segregation
  - Marking procedures
  - Traceability of the product as it moves through the system or to other authorised producers
  - Records attesting to treatment, production, handling and marking of compliant products
  - Security of the marking system
  - Etc.
Elements of an official production system

- Publication of information on authorised facilities
- Outreach and education
  - Identification and cooperation from the sector
  - Cooperation from users and cooperators (e.g. freight-forwarders, etc.)
- Audit and oversight
  - NPPO or authorised agency
  - Training
  - Frequency
- Follow-up on non-compliance
Marking

- Phytosanitary certificates should not be used
- Mark must comply with Annex 2
- Should not include additional information (e.g. dates, symbols, etc.)
- Must be easily read
- Dunnage may require multiple marks
Reuse, Repair and Remanufacture

- **Reuse**
  - Ongoing use without changing components
  - No requirement to re-treat or re-certify

- **Repair**
  - < 1/3 of components changed
  - Treated wood must be used
  - Mark must be affixed to the repaired components
  - No requirement to re-treat
  - Complexity in determining origin if non-compliant

- **Remanufacture**
  - > 1/3 of components changed
  - Entire unit should be retreated
  - All previous marks removed and unit re-certified
Supervision of the export system

- NPPOs cannot oversee or verify that every unit complies with requirements
- Oversight should be based on verifying that:
  - A producer’s documented procedures meeting prescribed standards and
  - Records of production and the inspection of activities or commodities to confirm compliance
- Unannounced auditing, testing, etc.
- Repair and remanufacture managed in as manner similar to the production of new WPM
Examples of auditing the system

- **Treatment**
  - Do the volumes of treated wood used match WPM produced?
  - Do records of treatment confirm the volumes of wood required for production?
  - Is the wood being used pest free?
  - Does the treatment chamber meet prescribed operating conditions;...

- **Marking of treated products** –
  - Is the mark applied only to wood which has been treated?
  - Is the mark applied after assembly?
  - Is the mark consistent with Annex 2;...

- **Security of the mark**
  - Who has access?
  - Do those that have access understand their responsibilities;...

- **Segregation**
  - Are treated and untreated products easily identified?
  - Do employees understand the requirements;...
Import control

Considerations:
- Legislation to control imported goods
- Outreach and awareness
- Availability/effective utilization of inspection resources
- Location of inspection site (e.g. at the port of entry; redirection to an inspection site; at destination; etc.)
- Requirements for import declarations to identify compliant shipments
- Equipment to conduct inspections
Import control

Considerations:
- Training/education of staff or cooperating agencies (Customs, port employees, etc.)
- Protocols for the selection of imports for inspection
- Actions to be taken on non-compliant imports
  - Separation of the commodity from the non-compliant WPM
  - Redirection or refusal of the commodity and the non-compliant WPM
  - Treatment, etc.

Notification of non-compliance
- Importers should be made aware of non-compliant shipments
- Notification in keeping with ISPM 13
Import inspection

- Shipment is redirected to inspection location
- Gas testing
- Shipment is offloaded for inspection
- Some shipments inspected in place
Approved treatments

- Debarked wood should be used
  - Any residual piece < 3cm or
  - If > 3cm no more than 50 cm²

- Treatments practically eliminate the risks of pests present in the wood at time of treatment
  - Heat treatment (HT)
  - Dielectric heating (DH)
  - Methyl Bromide (MB) fumigation

- Treatment should precede marking
- Debarking should precede methyl bromide fumigation
Debarking

4 cm

120 cm

1.8 cm
Heat treatment

- Heating of the wood to a specified temperature across its profile for specified period of time
  - 56°C for 30 minutes = HT
  - 60°C for 60 seconds = DH
- Heat treatment in a conventional kiln achieved by reaching specific ambient temperatures and humidity in the chamber
- Experts in wood drying technology could be used to establish treatment schedules, operating conditions
- Kiln drying which includes moisture reduction during heating of the wood may or may not achieve heat treatment
Factors influencing effective heat Treatment

- Uniformity and velocity of air flow through the wood stack
- Air circulation around the wood stack
- The presence and size of cold spots in the chamber
- Type and effectiveness of the heat source
- Type of wood being treated (species/density, size, etc.)
- Number and type of temperature and humidity measuring devices
- Efficiency of the chamber
- Size of the chamber
- Humidification and venting
- Recording devices
- etc.
### Heating

<table>
<thead>
<tr>
<th>DB</th>
<th>153°F</th>
<th>147°F</th>
<th>143°F</th>
<th>141°F</th>
</tr>
</thead>
<tbody>
<tr>
<td>WB</td>
<td>135°F</td>
<td>135°F</td>
<td>135°F</td>
<td>135°F</td>
</tr>
<tr>
<td>RH</td>
<td>60%</td>
<td>71%</td>
<td>80%</td>
<td>84%</td>
</tr>
</tbody>
</table>

- DB: 160°F
- WB: 135°F
- RH: 50%

- DB: 140°F
- WB: 135°F
- RH: 87%

**Airflow**
Heating

- When air flows through the wood stack:
  - Its temperature decreases as energy is used in heating and evaporation.
  - Its relative humidity increases as it picks up moisture from the surface of lumber.
  - Its heating capacity decreases.

- Increasing the relative humidity in the chamber may be used to reduce the cooling effect of moisture in the wood.

- Fan reversals and increased air flows may reduce cold spots in the kiln.

- The wood stack should allow for air flow over and under the stack.

- The size and density of the wood should be consistent to ensure uniform heating.

- Baffles may be used to direct air flows and optimize heating.
Heat chamber operation

Chamber
Chambers should be constructed to ensure uniform heating

Loading

Air flow
Fans should be used to maximize air flow through the wood stack
Fan reversal may be required to ensure uniform heating within the stack
Heat chamber operation

Wet bulb

Sensors should be regularly calibrated. Sufficient sensors should be used to account for variation or failure in any sensor.

Dry bulb

Sensors should consider the location of cold spots in the kiln (e.g. exit side of the air flow, etc.).

Probes

Spacers

Spacers (stickers) should be used to maximize air flow through the wood.
Verification of heat treatment

Option 1
- Fixed number of temperature sensors inserted into the wood to measure temperatures through each treatment
- At least two sensors located in the cold spot (slowest heating pieces)

Option 2
- Test treatment with multiple temperature sensors to identify a specific treatment schedule (ambient temperatures and other operating conditions) for a specific wood (species, size, etc.)
- Based upon the test treatments, ongoing use of the specific schedule to ensure that each treatment meets the requirements

Where treatment systems are the same, initial measurements on one kiln may be used for additional similar kilns provided other factors such as species being treated, wood size, etc. remain constant
Methyl Bromide (MB) fumigation

- Annex 1: Table 1: Minimum CT for MBr

<table>
<thead>
<tr>
<th>Temperature (°C)</th>
<th>CT (g·h/m³) over 24 h</th>
<th>Minimum final concentration (g/m³) after 24 h</th>
</tr>
</thead>
<tbody>
<tr>
<td>21.0 or above</td>
<td>650</td>
<td>24</td>
</tr>
<tr>
<td>16.0 – 20.9</td>
<td>800</td>
<td>28</td>
</tr>
<tr>
<td>10.0 – 15.9</td>
<td>900</td>
<td>32</td>
</tr>
</tbody>
</table>

- Usually carried out on the basis of dose (concentration over a period of time (CT))
- CT is affected by sorption, leakage, temperature, humidity, etc.
- Table 2 of Annex 1 provides a guide to measuring treatment by way of concentration
- MB infiltrates most woods very well, but will not infiltrate large dimension timber (e.g. 20cm)
- Temperature must be > 10°C in order for the MB to remain gaseous
- Should temperatures fall below optimal, treatments should be extended or restarted
MB fumigation

- Applicators should observe good fumigation practices
  - Appropriate sealing/testing for leaks
  - Appropriate air circulation
  - Loading of chamber (not more than 80%)
  - Reduce/account for potential unwanted sorption (water, other articles within treatment area, etc.)
  - Removal of articles that may prevent fumigant penetration (impermeable wraps, etc.)
  - Temperature and dosage monitoring
  - Applicator and environment safety
MB fumigation

**Container fumigation**

- Appropriate fans placed in the chamber
- Sufficient lines are placed into the chamber to ensure effective dispersion of the gas

**Tarp fumigation**

- Logs are used to secure the tarp
- Several sheets are used to prevent leakage
ISPM implementation working group of APPPC

Working group:
Rep. of Korea (Lead),
Australia, India, New Zealand, Philippines
ISPM implementation working group

• The 26th session of the APPPC set up a working group to consider a programme to assist APPPC members implement International Standards for Phytosanitary Measures (ISPMs).
• The APPPC Standards Implementation programme is intended to:
  - collect information on how APPPC members are managing to implement ISPMs
  - identify the major problem areas with ISPM implementation for APPPC members
  - set up programmes to assist APPPC members improve their implementation of ISPMs.
ISPM implementation working group

- The method for doing this is for:
  - APPPC members to be asked, using a questionnaire, how they are managing to implement the various provisions of different ISPMs
  - for the Implementation working group to consider and analyze the results of the questionnaire and identify problem areas
  - the working group to recommend methods of improving the implementation of the relevant standards.
Questionnaire on ISPM 15 implementation

• 33 questions in 7 sessions
  - Registration of the IPPC mark
  - General implementation
  - Implementation in export
  - Implementation in import
  - each country’s mark
  - future plan
  - Improvement for ISPM 15
Results

• 17 countries responded (including Japan and Singapore) through the IPPC contact points
1. Registration of IPPC mark

Among 11 answered as registered country, 3 are not registered:
Among 5 answered as non-registered country, 2 are registered
→ understanding of status of some NPPOs on registration is not appropriate
1. Registration of IPPC mark

**desirable IPPC/APPPC activities to hasten the registration**

- Consulting from lawyer, other countries or IPPC
- Letter to your government from IPPC to request the registration
- Other

- 6 countries
- 4 countries
- 2 countries
1. Registration of IPPC mark

Based on APPPC questionnaire results, it was suggested that the letter from senior level FAO to the senior foreign affairs counterpart and senior Perm Rep. of member countries who does not have registration as Bureau recommendation → approved by CPM-8
1. Registration of IPPC mark

Many countries who has/had protection with Madrid system or individual country system or other system had/has expired → renewal has been completed
1. Registration of IPPC mark

Why the registration is necessary?

- The mark is owned by FAO
- NPPO can legally use the mark with registration in their country

Without registration, the mark may be used by others (not legally protected)

→ trading partners cannot trust the mark from un-registered countries
1. Registration of IPPC mark

Easy process for new registration or renewal

- Contact FAO legal (Laura) for official request to register/renew
- Reimburse the cost to FAO (~1,000$ approx)
1. Implementation of ISPM 15

number of countries that regulate WPM according to ISPM 15

- 17 countries for exporting
- 15 countries for importing
1. Implementation of ISPM 15

Certification of Export WPM Treatment

- Only IPPC mark: 5
- Only Phytosanitary Certificate: 12
- IPPC mark and PC: 12
1. Implementation of ISPM 15

**Main cause of non-compliance of export consignment**

- 12 countries
- 5 countries
- 2 countries

- Without IPPC mark or PC
- Detection of live insects or traces
- Result of lab test
1. Implementation of ISPM 15

required certification for imported WPM

- 1 country: IPPC mark only
- 2 countries: * PC only: 0
- 3 countries: IPPC mark or PC
- 9 countries: Both IPPC mark and PC
- Treatment certificate
2. Implementation of ISPM 15: difficulties

- Short of staff
- Short of training
- Lack of cooperation from private sectors
- No treatment facility
- Lack of cooperation with customs
- Increase cost
### 3. Capacity needed

<table>
<thead>
<tr>
<th>Area</th>
<th>Concerns</th>
<th>Suggested Assistance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Domestic capacity</strong></td>
<td>No protection of IPPC mark (cost)</td>
<td>Workshop on the registration process Consultation workshop</td>
</tr>
<tr>
<td></td>
<td>Lack of understanding on importance of registration of IPPC mark</td>
<td>Workshop on training</td>
</tr>
<tr>
<td></td>
<td>Short of training capacity</td>
<td>Workshop on training</td>
</tr>
<tr>
<td></td>
<td>Lack of cooperation from private sectors</td>
<td>Workshop on case study of other countries</td>
</tr>
<tr>
<td></td>
<td>Lack of cooperation with customs</td>
<td>&quot;</td>
</tr>
</tbody>
</table>
## 3. Capacity needed

<table>
<thead>
<tr>
<th>Area</th>
<th>Concerns</th>
<th>Suggested assistance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Domestic capacity</strong></td>
<td>Lack of registered treatment providers</td>
<td>Workshop/mentoring on - Treatment provider registration procedure - Requirement of treatment provider (MB, heat treatment)</td>
</tr>
<tr>
<td>Absence of regulation on WPM</td>
<td></td>
<td>Workshop/mentoring on - Regulation of WPM</td>
</tr>
<tr>
<td>Absence of regulation on re-used and repaired WPM</td>
<td></td>
<td>Share info. on regulation of re-used and repaired WPM</td>
</tr>
<tr>
<td>Lack of public awareness</td>
<td></td>
<td>Share experience on public awareness</td>
</tr>
</tbody>
</table>
3. Capacity needed

<table>
<thead>
<tr>
<th>Domestic capacity</th>
<th>Lack of reasonable and reliable monitoring system</th>
<th>Share experience</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Lack of interlinked system between NPPO and customs</td>
<td>&quot;</td>
</tr>
<tr>
<td></td>
<td>Too many treatment providers to audit</td>
<td>&quot;</td>
</tr>
<tr>
<td></td>
<td>Too many WPM to monitor</td>
<td>&quot;</td>
</tr>
<tr>
<td></td>
<td>Fraudulent stamp</td>
<td>&quot;</td>
</tr>
<tr>
<td>Implementation of importing country</td>
<td>Dual requirement of IPPC mark and PC</td>
<td>Information sharing</td>
</tr>
<tr>
<td>-----------------------------------</td>
<td>-------------------------------------</td>
<td>---------------------</td>
</tr>
<tr>
<td></td>
<td>Expiry date of treated WPM</td>
<td></td>
</tr>
<tr>
<td>ISPM content</td>
<td>Unclear treatment method and its guideline</td>
<td>Submit to IRSS</td>
</tr>
<tr>
<td>--------------</td>
<td>------------------------------------------</td>
<td>----------------</td>
</tr>
<tr>
<td>Contaminated or dirty WPM with IPPC mark</td>
<td>Submit to SC</td>
<td></td>
</tr>
<tr>
<td>Not enough effect of the treatment on pathogens</td>
<td>“</td>
<td></td>
</tr>
<tr>
<td>Unclear guideline on repaired and re-used WPM</td>
<td>Submit IRSS</td>
<td></td>
</tr>
<tr>
<td>ISPM Interpretation</td>
<td>Consignment is WPM itself</td>
<td>Forward to IRSS</td>
</tr>
<tr>
<td>---------------------</td>
<td>---------------------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>Destination of non-compliance notification (exporting country/origin country)</td>
<td>“”</td>
<td></td>
</tr>
<tr>
<td>Not clearly visible mark</td>
<td>“”</td>
<td></td>
</tr>
<tr>
<td>Compliance of bark and marking</td>
<td>“”</td>
<td></td>
</tr>
<tr>
<td>Information sharing</td>
<td>Update list of ISPM 15 implementing countries</td>
<td>Forwarded to IRSS with Asia info.</td>
</tr>
<tr>
<td>---------------------</td>
<td>-----------------------------------------------</td>
<td>---------------------------------</td>
</tr>
<tr>
<td>Others</td>
<td>Concern on MB</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Confusion of exporters with KD and IPPC mark</td>
<td>Include in info package for workshop</td>
</tr>
<tr>
<td></td>
<td>Interception live insect from WPM with IPPC mark</td>
<td>Forward to IRSS</td>
</tr>
</tbody>
</table>
Suggested work plan for ‘14~15

- ISPM 15: follow up action
  NAPPO joint workshop (‘14)
  facilitate registration and renewal
  export certification?
  additional treatment?
Control of the ISPM 15
Mark
• All that is necessary for WPM to enter a country is a mark on the WPM that contains the IPPC registered symbol combined with a country code, producer/treatment provider and treatment code in a stamp format suggested in Annex 2 of ISPM 15

• NPPO’s of importing countries inspect some percentage of shipments but unless visible evidence of pests or large amounts of bark are present, the ISPM 15 mark on the WPM is accepted as evidence the WPM complies with ISPM 15 requirements
• NPPO’s provide ISPM 15 marks to manufacturers of WPM and the manufacturers use the ISPM 15 mark on WPM destined for export

• In the US approximately 5,400 WPM manufacturers of WPM can use ISPM 15 marks

• In Canada approximately 500 WPM manufacturers of WPM can use ISPM 15 marks

• Between these two countries at least 5,900 different marks can be used and many of these manufacturers have more than 1 mark

• When all countries implementing ISPM 15 are considered tens of thousands of different marks are being used

• Significant problems with the integrity of ISPM 15 could develop unless these numerous marks are controlled by the NPPO’s
• NPPO’s should have standardized procedures that provide for the safe keeping and use of the ISPM 15 marks that are distributed to WPM manufacturers—procedures could include:

  • maintain records (including facsimile of each mark) to document the number and format of marks issued to each approved WPM manufacturer—continuous verification should be made by NPPO inspections at each manufacturer

  • have a procedure for approving a facsimile of the mark before it is produced and issued for use by the WPM manufacturer

  • approval of the mark facsimile would provide the NPPO with a tool for standardizing and controlling the issuance all of the marks
    ✓ this standardization includes mark reproduction accuracy, font type and format

  • have procedures for verification of the destruction of worn out marks as well as a procedure for updating mark records of the NPPO when marks are destroyed
Why standardize the ISPM 15 mark and its components
(i.e. IPPC symbol, and format of the other elements within the mark borders)

• Assists the exporting NPPO in determining if the WPM is produced under its official program

• Assists importing NPPO’s in determining and accepting legitimate marks on WPM

• Makes copying the mark by an unauthorized user more difficult
  ✓ many marks presently used are not standardized therefore could be easily copied
  ✓ standardized mark is more difficult to copy because of the precise detail of the mark (fonts size, style of the lettering, etc.)

• Standardized marks will strengthen ISPM 15
Is Close Adequate—Which Mark Is Authorized?

Shown below are photos of typical ISPM 15 marks that show many variations from the standardized mark. These variations make acceptance difficult for importing NPPO’s.
Variations of marks from the official formats shown in ISPM 15 could simplify unauthorized reproduction—basically any mark that appears to be an ISPM 15 mark is presently being used and apparently being accepted by importing NPPO’s.

Poor control of the reproduction of the mark could lessen the effectiveness of ISPM 15 in accomplishing its goal of preventing unwanted pests from being transported on WPM.

Remember the mark is what the importing NPPO relies upon to identify WPM that meets the requirements of ISPM 15.

Successful implementation of ISPM 15 is dependent on strong programs for the control of ISPM 15 marks being developed and used by NPPO’s.
Summary of important areas to assist NPPO’s in control of the ISPM 15 mark

• Authorize initial distribution of the mark to the WPM manufacturer to assure standardization

• Inspections at the WPM manufacturer that include verification of the number and types of marks used

• Account for the destruction of worn marks

• Provide listing of typically used standardized mark formats for reference in identifying an authorized mark—this listing will be invaluable in helping to identify a fraudulent mark

The steps mentioned above will strengthen ISPM 15 and provide a more robust international standard that will enhance the effectiveness in reducing the movement of quarantine pests between countries—**the goal of ISPM 15**
Fraudulent and Unauthorized Marks
What is the Difference Between a Fraudulent and an Unauthorized Mark

• Both marks are unauthorized

• An unauthorized mark is a mark that has been officially issued by the NPPO and is being used without the knowledge of the NPPO
  ✓ control of the mark by the NPPO is very important so that unauthorized use is prevented

• A fraudulent mark is a mark that has been reproduced to look like an official mark of the NPPO
What is different about the marks?

- The IPPC symbol—note the fraudulent mark does not have the lettering “IPPC”
- No registered symbol and no hyphen between the “US” and “709”
- The font is different
- Mark layout is different
- This mark was made not made in the US but in another country, US Custom and Border Control refused this mark because it did not conform to the standardized mark issued by the agency in the US
Listing of Typical US Authorized ISPM 15 Marks
Note the difference in the agency trademark and lack of registered symbol.

Note IPPC incorrect; NeLMA incorrect.

Note the format of the mark is incorrect.
Authorization Mark

Note the T and P are not connected, lack of “AUDITED BY”, registered symbol

Fraudulent Mark

Note the T and P are not connected, IPPC symbol, font and format differences
Note the mark shows “IPPG” instead of “IPPC”; format of the mark is incorrect.

Note the mark shows “SIWR” instead of “SIWP”; IPPC symbol incorrect, format of mark incorrect.
US or Mexico?
When a Fraudulent/Unauthorized ISPM 15 Mark is Encountered

• The ISPM 15 trademark is registered in most countries. NPPO’s of the registering country have the responsibility to protect the trademark.

• NPPO programs should include procedures to uncover the use of fraudulent/unauthorized marks.

• Possible steps for NPPO’s to implement when a fraudulent/unauthorized mark is found:
  o Determine where the mark is being used and confiscate the mark
  o Obliterate the fraudulent/unauthorized mark from any WPM to prevent use as ISPM 15 compliant
  o Investigate where the fraudulently/unauthorized marked WPM was shipped and obliterate the marks if possible
  o Take appropriate legal action against the producers/users of the fraudulent/unauthorized mark
  o Publicize any action taken to discourage others from producing and using fraudulent/unauthorized marks
Control of the ISPM 15 mark by the NPPO is a significant factor in the successful implementation of ISPM 15.
QUESTIONS?

If you would like a copy of this presentation, please send me an email:

jmcdaniel@alsc.org

Thank you!
ISPM 15
Implementation in
Australia

Peter Creaser, Director, Grain and Seed Exports Program
Plant Export Operations, Department of Agriculture
Beijing, June 2014

www.agriculture.gov.au
Management of ISPM 15 through an Australian system
The Australian Wood Packaging Certification Scheme - Overview

Department of Agriculture (NPPO): Overarching responsibility for the AWPCS.

Joint Accreditation System of Australia and New Zealand: Accredits third party certification bodies under the AWPCS.

Certification Bodies: Assess applications and undertake onsite audits.

Treatment Providers and Manufacturers
1. The Australian Government Department of Agriculture

Overarching responsibility for the AWPCS

Australian Government Department of Agriculture (DA) is the National Plant Protection Organisation of Australia.
Main functions: Department of Agriculture (DA)

Issue certification numbers for use by approved treatment providers and/or manufacturers.

- Respond to technical inquiries
- Provide a unique certification number to approved treatment providers and manufacturers
- Maintain the department website
- Maintain the AWPCS register
- Regularly review the AWPCS, and provide updates detailing requirements of ISPM 15
- Interact with the third party accreditation body, JAS-ANZ
- Liaise with international government agencies
- Investigate non-compliance
2. Joint Accreditation System of Australia and New Zealand

Accredits third party certification bodies under the AWPCS

Organisation approved by the Department of Agriculture to accredit certification bodies to audit and certify facilities suitable for ISPM 15 manufacture and treatment of wood packaging material.
Main functions: JAS-ANZ

- Accredit AWPCS certification bodies
- Maintain consistency of AWPCS certification body audits throughout Australia
- Perform on-going monitoring of certification bodies

- Liaise with certification bodies and DA
- Notify DA of any changes to accreditation status of certification bodies
3. Certification Bodies

Assess applications and undertake onsite audits

A company or organisation accredited by the accreditation body (JAS-ANZ) to assess the suitability of a treatment provider or wood packaging manufacturer for certification under the AWPCS.
Main functions: Certification bodies
Assess applications and undertake onsite audits of treatment providers and manufacturers.

- Conduct an initial site audit and assess the application
- Review applicant’s quality manual
- Conduct verification audits of each facility at six-monthly intervals and provide to DA
- Notify DA in writing of any changes to a treatment provider or manufacturer’s status
4. Treatment Providers and Manufacturers

Apply the internationally recognised ISPM 15 mark which includes the Department of Agriculture issued unique certification number to wooden packaging material treated as per the AWPCS
Main functions: Treatment Providers and Manufacturers

Adhere to the requirements of ISPM 15 and the AWPCS.

- Comply with all relevant legislation, safety codes, or licensing to the State/Territory where the treatment is performed
- Ensure all treatments are performed as specified in the AWPCS
- Ensure all staff are aware of the AWPCS requirements and appropriately trained
- Assist the certification body with audits
- Apply the ISPM 15 certification mark correctly
- Destruction of the ISPM 15 certification mark upon withdrawal or cancellation from the AWPCS
ISPM 15 implementation in Canada

Shane Sela
APPPC-NAPPO Workshop on ISPM 15
June 10-15, 2014, Beijing China
Implementation of an export program

- March 12, 2001 E.U. imposed temporary emergency measures for coniferous wood packaging material (WPM)
  - Pinewood nematode
- October 1, 2001  E.U. fully implemented
- CFIA established certification program to comply:
  - Register facilities
  - Prescribe standards of production and handling
  - Control credibility of marking
  - Establish third party oversight of accredited facilities
  - Verify compliance of the system
Canadian export program

- Since the early 1990’s Canada has had an official system for the production of certified heat treated wood
- D-03-02 Canadian Heat Treated Wood Products Certification Program (CHTWPCP) for Export
  - Systems approach for the production of heat treated lumber
- In Canada most WPM is produced from heat treated wood
- D-01-05 The Canadian Wood Packaging Certification Program (CWPCP) for Export
  - Systems approach for the production of ISPM 15 compliant WPM
Canadian export program

- Elements of both programs include:
  - Prescribed standards for treatment and/or production - critical control points
  - Control of the application of marks
  - Control of source inventories, segregation of products, etc.
  - Maintain records attesting to system operation (e.g. inventory and treatment records, training, etc.)
  - External audits confirm compliance with standards

- Canadian certified production:
  - ~ 450 heat treatment facilities
  - ~ 475 wood packaging manufacturers
Canadian export program

Heat treatment

Treated wood shipped to WPM production facility

Traceability

Segregation during production

Assembly

Certification

Verification of compliance

Shipment readied for export
Export non-compliance

- Canada is the world’s 12th largest exporter at $458 billion
- Canada received 31 notifications of non-compliance in 2013
- All were associated with exporters who shipped commodities on uncertified WPM
- CFIA or approved third parties conduct outreach to improve compliance
Implementation of an import program

- 2002 IPPC adopts ISPM 15, Canada, the U.S. and Mexico agreed to implement the import components of the standard in a harmonized way;
- The three countries began implementation in 2004 and fully implemented in 2006;
- Canada and the U.S. agreed to forgo implementation of ISPM 15 requirements for WPM produced in Canada or the U.S.
- Canada and the U.S. are moving to remove this exemption
Canadian import program

- Vancouver, Prince Rupert, Montreal and Halifax
- Manifested goods reviewed
- High risk shipments re-directed for breakdown inspection within a designated sufferance (bonded) warehouse
- Inspection targeting based upon:
  - Shipments likely to contain WPM,
  - Compliance history,
  - Commodity type, etc.
- About 3000 – 4000 shipments inspected annually
Compliance 2006-2007

- Compliant: 62.06%
- Shipments without certification (no visible signs of infestation): 32.62%
- Infested shipments with or without certification: 5.32%
Compliance 2012-2013

- Compliant: 93.50%
- Shipments without certification (no visible signs of infestation): 3.33%
- Infested shipments with or without certification: 3.17%
Examples of frequently intercepted pests

- *Arhopalus* sp.
- *Sinoxylon* sp.
- *Monochamus* sp.
- *Trichoferus* sp.
- Siricidae
- Unidentified Bostrichidae, Cerambycidae, Curculoinidae & Spondylidinae
Conclusions

- International implementation of ISPM 15 has reduced pest risks associated with WPM;
- However since implementation Canada continues to see about 5-6% non-compliant shipments
- About $\frac{1}{3}$ of non-compliant shipments are infested
- About $\frac{3}{4}$ of infested shipments have an IPPC mark
  - Poor treatment application?
  - Fraud?
  - Potential re-infestation, if the wood is poorly debarked?
- Non-compliance continues to present serious quarantine risks;
  - Infestations of *Agrilus planipennis*, *Anoplophora glabripennis* likely originated from infested WPM
QUARANTINE MANAGEMENT SYSTEM for IMPORT & EXPORT WPM in CHINA

冯春光
国家质检总局动植司
1. The adoption of ISPM 15 in China
Adoption of ISPM No.15 in China

1. Establish mandatory regulation according to ISPM 15
   • AQSIQ Decree No. 69, on Promulgating the Measures for Administration of the Quarantine Treatment of Wood Packaging Materials for Exit Cargos.
   • AQSIQ Decree No.84, on Promulgating the Measures for Administration and Supervision on Quarantine of Wood Packaging Materials Used by Entry Cargos.

2. Official announcement
   • AQSIQ Announcement No.11, 2005, Promulgating the Quarantine Requirements for Wood Packaging Materials Used to Transport Import Goods.
   • AQSIQ Announcement No. 4, 2005, Releasing the Requirements for Wood Packages of Exit Cargos.

3. Education and training for stakeholders

Benefit for adoption of ISPM No.15 in China

1. Prevent pests from spreading across border
2. Facilitate international trade
3. Strengthen cooperation and communication with international counterparties
AQSIQ

Inspection & Quarantine Bureaus (35)

Supervising and directing local inspection and quarantine offices to implement the regulations adopted by AQSIQ at provincial level.

Inspection and Quarantine Offices (831)

Developing and enacting the regulations; Integrated management.

Monitoring the treating and marking of WPM at local level.
2. The quarantine management system for import WPMs
（1）Quarantine requirements for importing WPM

a. General requirements
b. Approval Methods for treating WPM
c. Marking requirement

（2）Guarantee measures

a. inspection
b. treatment
c. Credibility management
d. Notification on non-conformity
e. Cooperation across border
c. Marking requirement

Sample mark:
2. Guarantee measures

a. Phytosanitary inspection at port of entry

The importers or his/her agent shall declare to official inspector for quarantine inspection on WPM. The inspector will perform random.
Sampling at port of entry

<table>
<thead>
<tr>
<th>PICs of WPM</th>
<th>Sampling rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>≤5</td>
<td>100%</td>
</tr>
<tr>
<td>6~20</td>
<td>50% (5 pics at least)</td>
</tr>
<tr>
<td>21~51</td>
<td>30%</td>
</tr>
<tr>
<td>≥51</td>
<td>20%</td>
</tr>
</tbody>
</table>

Key elements concerned by inspectors
—originating countries from which non-compliance occurred frequently
—consignments always using WPM but fail to declare for inspection
—business operators, including exporters, importers and IPPC mark users, from which non-compliance occurred frequently
WPM transit from Hong Kong and Macao into Mainland

- Institute authorized by AQSIQ conducts following activities in Hongkong and Macao against non-compliant WPM:
  1. Quarantine treatment followed by applying IPPC mark or issuing fumigation certificate.
  2. When the no WPM declaration raised by trader is confirmed, issues no WPM confirmation in writing.
- Inspector at port of entry of Mainland will take low level official verification if the trader could present the documents mentioned above.
b. Phytosanitary actions taken

In the case of IPPC mark missing or pests detected, the WPM will be treated or destroyed, or refused entry of the whole consignment in case the situation is deemed to be severe enough.
d. Notification of non-compliance

AQSIQ notifies the NPPO of the exporting countries or regions of non-compliant WPM on which pests are detected or IPPC mark is missing.
5、检疫现状

中国大陆地区年进境货物木质包装200万批次以上，截获各类有害生物近4万种次。

（1）携带有害生物比例居高不下

（2）木质包装无标识比例依然较高

（3）木质包装重复使用难以有效追溯
4. The quarantine system for Exporting WPMs
Quarantine requirements

a. General requirements

b. Approval Methods for WPM treatment

Guarantee measures

a. certification of IPPC mark user

b. The monitoring of the treatment process

c. Random inspection at ports of exit
General requirements

- WPMs used for Export shall be treated and marked with IPPC mark by companies certified by AQSIQ.

- Exporters who use WPM should purchase WPMs from certified companies (up to now 1128).
Approval methods for treating WPM

- Heat treatment

Minimum wood core temperature: 56°C and, minimum exposure time: 30 minutes;
Methyl bromide (MB) fumigation

<table>
<thead>
<tr>
<th>Temperature</th>
<th>Dosage (g/m³)</th>
<th>Minimum concentration (g/m³) at:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>2 hrs.</td>
</tr>
<tr>
<td>≥21°C</td>
<td>48</td>
<td>36</td>
</tr>
<tr>
<td>≥16°C</td>
<td>56</td>
<td>42</td>
</tr>
<tr>
<td>≥11°C</td>
<td>64</td>
<td>48</td>
</tr>
</tbody>
</table>

Note: The minimum temperature should be 10°C and the minimum exposure time should be 24 hours. The concentration shall be measured at the 2nd, 4th and 24th hours.
c. 中国出境货物木质包装标识式样
Sample mark of CHINA for WPMs of exit goods
2. Guarantee Measures from official perspective

- Establishing conditions for using IPPC mark
  (in terms of treating facility, management system, etc.)
- Conformity assessment and certification (the approval list of IPPC mark users is published on the official website)
- Routine surveillance on each treatment

  Before performing treatment, the company shall inform the local CIQ which may conduct supervision on the entire processes of treatment and marking, on site or by remote monitor.
Accepting an application

Pre-treatment inspection

Monitoring of the treatment process

Treatment result evaluation

Supervision of the labelling

Verification
ToTopoogy of WFM heat treatment supervision system
熏蒸浓度曲线  MB concentration curves
Video monitoring images
5. the challenges in front of us
Challenges in front of us

1. Fraudulence of IPPC mark
   - Easy to be forged, difficult to be verified
   - No secure technology when applying IPPC mark
   - Hard to check WPM used for consignment which would not be subject to phytosanitary inspection.

2. Reusing of WPM makes investigation less practical if non-compliance is notified by importing country.

3. Measuring core temperature is difficult by inserting probe into part of WPM.

4. Key information is needed for tracing back and conducting investigation.
To fight against fraudulence of IPPC mark, security system could play important role
(1) only official who conduct routine supervision on treatment and IPPC mark user could log on security system, to maintain information including IPPC mark, WPM purchaser, date of treatment, and so on
(2) all stakeholders could check unique security number indicated on the WPM which is generated by aforementioned secure system to justify the authenticity of IPPC mark so as to ensure the WPM coming from certified facility.
<table>
<thead>
<tr>
<th>防伪码分配</th>
<th>防伪码使用情况</th>
</tr>
</thead>
<tbody>
<tr>
<td>已分配防伪码个数</td>
<td>100</td>
</tr>
<tr>
<td>防伪码起始号</td>
<td>21 980 0000200</td>
</tr>
<tr>
<td>防伪码起始号</td>
<td>21 148 00000001</td>
</tr>
<tr>
<td>填写分配个数</td>
<td>100</td>
</tr>
<tr>
<td>分配个数</td>
<td>100</td>
</tr>
<tr>
<td>选择所需分配企业</td>
<td>金莲宝牌</td>
</tr>
<tr>
<td>防伪码起始号</td>
<td>CN-018-HT-32</td>
</tr>
<tr>
<td>防伪码起始号</td>
<td>3200000008 2012/06/07</td>
</tr>
<tr>
<td>防伪码起始号</td>
<td>3200000007</td>
</tr>
<tr>
<td>防伪码起始号</td>
<td>CN-033-HT-21</td>
</tr>
<tr>
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</tr>
<tr>
<td>分配</td>
<td>100</td>
</tr>
<tr>
<td>分配</td>
<td>100</td>
</tr>
<tr>
<td>选择所需分配企业</td>
<td>金莲宝牌</td>
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<tr>
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<tr>
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<td>3200000007</td>
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<td>100</td>
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<td>3200000008 2012/06/07</td>
</tr>
<tr>
<td>防伪码起始号</td>
<td>3200000007</td>
</tr>
</tbody>
</table>
If true
If false
1. promoting the security system among trade partner to fight against illegal use of IPPC mark

2. To expedite the process of communication in the case of non-compliance, appointing contact point among NPPO and APPPC members to transmit necessary information and documents, including notification form and associated certificates, by email as an official channel.

3. Setting the technical standard of monitoring space temperature as an alternative to core temperature.
谢谢

Thanks!
GOVERNMENT OF INDIA
MINISTRY OF AGRICULTURE
(DEPARTMENT OF AGRICULTURE AND CO-OPERATION)
DIRECTORATE OF PLANT PROTECTION, QUARANTINE, STORAGE
BY - DR. VASUDHA GAUTAM ASSISTANT DIRECTOR

APPPC/NPPO JOINT WORKSHOP ON
ISPM 15: REGULATION OF WOOD PACKAGING MATERIAL IN INTERNATIONAL TRADE
10-14 JUNE 2014, BEIJING, CHINA
The major thrust areas of plant protection are streamlining the quarantine measures and eliminating the possibilities of entry of exotic pests.

Pests associated with wood packaging material are known to have negative impacts on forest health and biodiversity.

Implementation of ISPM 15 is considered to reduce significantly the spread of pests and subsequently their negative impacts.

In 2009 (Revised) - REGULATION OF WOOD PACKAGING MATERIAL IN INTERNATIONAL TRADE
The Sanitary and Phytosanitary Agreement of WTO envisages application of Phytosanitary measures based on scientific justifications. Therefore, it is imperative to conduct all Plant Quarantine inspections as per the International Standards/guidelines.

India has developed total 22 National Standards for Phytosanitary Measures.
<table>
<thead>
<tr>
<th>National Standards for Phytosanitary Measures (NSPM)</th>
<th>NSPM No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plant Quarantine Operation Systems Manual</td>
<td>1</td>
</tr>
<tr>
<td>Import Inspection Manual</td>
<td>2</td>
</tr>
<tr>
<td>Export Inspection Manual</td>
<td>3</td>
</tr>
<tr>
<td>Post-Entry Quarantine Inspection Manual</td>
<td>4</td>
</tr>
<tr>
<td>Pest Risk Analysis: Administrative Process Manual</td>
<td>5</td>
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<tr>
<td>Pest Risk Analysis-Technical Methodology</td>
<td>6</td>
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<tr>
<td>Guideline for Reporting Plant Quarantine Material</td>
<td>7</td>
</tr>
<tr>
<td>Guidelines for Auditing of Plant Quarantine Activities</td>
<td>8</td>
</tr>
<tr>
<td>Guideline for Certification of Forced Hot Air Treatment for Wood Packaging Material</td>
<td>9</td>
</tr>
<tr>
<td>Guideline for Export Inspection and phytosanitary certification of Fresh Mango (Mangifera indica) fruits to P.R. China</td>
<td>10</td>
</tr>
<tr>
<td>Quarantine Treatments and Application Procedures- 1. Methyl Bromide Fumigation</td>
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<td>Guideline</td>
<td>NSPM No.</td>
</tr>
<tr>
<td>--------------------------------------------------------------------------</td>
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<tr>
<td>Guideline for Assessment, Accreditation &amp; Auditing of Fumigation Agencies</td>
<td>12</td>
</tr>
<tr>
<td>Requirement for establishment of PFA for Mango nut Weevil and pulp Weevil</td>
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<tr>
<td>Requirement for establishment of PFA for Tephritid fruit flies</td>
<td>14</td>
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<tr>
<td>Guidelines for certification of Hot water immersion treatment facilities</td>
<td>15</td>
</tr>
<tr>
<td>Guidelines for development of NSPM</td>
<td>16</td>
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<tr>
<td>Guidelines for Regulating Export, Import &amp; Import Release of Biological Control Agents &amp; other Beneficial Organism</td>
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<tr>
<td>Guidelines for Certification of HT facilities for Niger seed</td>
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<tr>
<td>Requirement for establishment of PFA for Brown Rot</td>
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<tr>
<td>Guidelines for certification of VHT facilities for fresh fruits</td>
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<tr>
<td>Guidelines for Certification of Irradiation Treatment Facilities for Fresh Fruits</td>
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<tr>
<td>Guidelines for Assessment, Audit and Accreditation of Fumigation Agencies for Undertaking ALP Fumigation</td>
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</table>
- NSPM-12: Guidelines for Assessment, Audit and Accreditation of fumigation agencies for undertaking Methyl Bromide Fumigation
  - [http://plantquarantineindia.org/pdffiles/nspm%2012%20guidelines%20for%20accreditation%20of%20fa.pdf](http://plantquarantineindia.org/pdffiles/nspm%2012%20guidelines%20for%20accreditation%20of%20fa.pdf)
India has implemented ISPM 15 since 2009 for Export compliance to meet requirement of importing country.

India also joined Australian Fumigation Accreditation Scheme (AFAS)

Trainers from AQIS conducted a training of AFAS Standard to the Plant Protection Officers from Directorate of Plant Quarantine and the various treatment service providers.

Every year Once for 7 days, Directorate of Plant Quarantine arrange a training by AFAS trained, master trainers for the other staff/new recruiters.
Methyl Bromide

Forced Hot Air Treatment
## Approved Methyl Bromide Treatment - as per NSPM 11

<table>
<thead>
<tr>
<th>Temperature</th>
<th>Dosage (g/m³)</th>
<th>Maximum Conc. (g/m³) at</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2h</td>
<td>4h</td>
</tr>
<tr>
<td>21°C or above</td>
<td>38</td>
<td>36</td>
</tr>
<tr>
<td>16°C or above</td>
<td>56</td>
<td>42</td>
</tr>
<tr>
<td>10°C or above</td>
<td>64</td>
<td>28</td>
</tr>
</tbody>
</table>
RESPONSIBILITIES OF FUMIGATION AGENCY

- hold valid license and certificate of registration
- be technically competent to perform relevant treatment
- perform fumigation under supervision of accredited fumigation operator
- advise client about the time and dose requirements for successful treatment
This standard prescribes treatment facilities for treating WPM in accordance with ISPM-15.
The WPM required to undergo approved treatment such as HT at $56^0$ C for 30 min.
The treatment reduces pest risk prior to export and affix the marking as per the IPPC norms.

*It's necessary for treatment providers* to undergo training for a period of at least five days at any of the training institute accredited by Ministry of Agriculture.
TRAINING CONDUCTING INSTITUTES

- Directorate Of Plant Protection Quarantine and Storage, Ministry of Agriculture
- National Institute of Plant Health Management, Hyderabad
- Agriculture and Processed food products Export Development Authority
- Indian Council of Agriculture Research, New Delhi
Total 454 Accredited Fumigation Agencies for Methyl Bromide Fumigation: ISPM-15


http://www.plantquarantineindia.org/Accreditated.htm
For latest position on status of accredited Firms to carry out HT and MB – visit our official website [www.plantquarantineindia.org](http://www.plantquarantineindia.org)

**Registration of Indian ISPM 15 Symbol is under process.**
ISPM 15- POSTER

- Directorate’s Awareness program - A poster of ISPM 15 implementation procedure
CAUSES OF NON COMPLIANCES

- Pest Resistance to treatment
- Failed Treatment
- Fraudulency by treatment providers
- Mark not used as per International Standard
NON COMPLIANCE - ACTION

Notify NC –

- Conduct an Investigation
- Documents/Reports Submitted to NPPO
- Examining the Documents/Reports NPPO
  - Warned the company
  - Suspend registration for a period of time
  - Blacklisted the company

According to the situation
THANKS
VASUDHA.GAUTAM@NIC.IN
Country experiences in implementing ISPM 15

Takashi Kawai
Yokohama Plant Protection Station
Ministry of Agriculture, Forestry and Fisheries (MAFF)
Japan
Japanese Certification System of WPM for export

Ministry of Agriculture, Forestry and Fisheries (MAFF)

Plant Protection Station

Application

Authorize (Revocation)

Annual Report
- Treated and marked records
- Result of monitoring

Verify authorized body’s activities
- Approving and registering activities
- Auditing activities about
  - treatment
  - marking
- Others

Authorized body

( Japan Plant Quarantine Association &
Japan Lumber Inspection & Research Association)
Japanese Certification System of WPM for export

**Authorized body**
(Japan Plant Quarantine Association & Japan Lumber Inspection & Research Association)

**Monitoring treatment provider and WPM producer activities**
- Inspection about
  - Treatment Record
  - Marked Record
- Technological advice
  - Ways of Treatment or Marking
  - Storage Management of Treated WPM

**Approved Treatment Provider**
(about 340 companies)
- <keep documents>
  - Treated records (copy)

**Registered WPM Producer**
(about 1850 companies)
- <keep documents>
  - Treated records
  - Marked records

- Treatment request
- Issue treated records
Japanese Certification System of WPM for export

Ministry of Agriculture, Forestry and Fisheries (MAFF)

Plant Protection Station

Monitoring

Approved Treatment Provider
(about 340 companies)

Registered WPM Producer
(about 1850 companies)

Treatment

Manufacture
### Volume of Marked WPM Production

<table>
<thead>
<tr>
<th>Fiscal Year</th>
<th>2009</th>
<th>2010</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>WPM ( (\times 1,000\text{m}^3) )</td>
<td>624</td>
<td>796</td>
<td>795</td>
<td>724</td>
<td>690</td>
</tr>
</tbody>
</table>

#### Exportation of WPM in Japan

The table above shows the volume of marked WPM production in Japan from fiscal year 2009 to 2013. The production increased from 624 thousand cubic meters in 2009 to 796 thousand cubic meters in 2010, and then fluctuated slightly until 2013, with a slight decrease to 690 thousand cubic meters.
March 2002
Adoption of ISPM 15

Pest Risk Analysis for Imported WPM
Conclusion: WPM can be a pathway for introduction and spread of pests to Japan.

April 2007 Establishment of the regulation on Imported WPM in compliance with ISPM 15
Scope of the Regulation on Imported WPM in Japan

- WPM out of ISPM 15 (Plywood, Veneer, Particle Board etc.)
- WPM treated and marked in compliance with ISPM 15
- WPM without the mark

Not subject to inspection

Subject to Inspection
Importation of WPM in Japan

Imported WPM

WPM not specified in ISPM15
- Inspection unnecessary
- With Required Mark
  - Disposal/Reshipment
- Without Required Mark
  - Rejection

WPM specified in ISPM15
- Inspection
- Without Required Mark
  - Rejection
  - Treatment
  - Approval
- With Required Mark
  - Pass
Importation of WPM in Japan

WPM subject to ISPM

Pallets
Wooden Cases
Wooden Crates
Drums

WPM not requiring quarantine inspection

Processed WPM such as Plywood, Particle Board, Oriented Strand Board, Veneer

(Left: Wood Chip, Right: Wood Wool)

Others: Sawdust, shavings, Wood Wool, Wood Chip

(Photo: Plywood)
### Record of inspection of imported WPM in Japan

<table>
<thead>
<tr>
<th>Year</th>
<th>2007</th>
<th>2008</th>
<th>2009</th>
<th>2010</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Inspection</td>
<td>5,223</td>
<td>2,670</td>
<td>1,713</td>
<td>1,147</td>
<td>754</td>
<td>467</td>
<td>479</td>
</tr>
</tbody>
</table>

* In 2007, number of inspection is total from April to December
Record of import inspection in Japan
Importation of WPM in Japan

Detected Quarantine Pests
(2007～2013)

- Scolytidae: 38% (39)
- Bostrychidae: 6% (6)
- Cerambycidae: 9% (9)
- Nitidulidae: 7% (7)
- Curculionidae: 8% (8)
- Platypodidae: 14% (15)
- Others: 18% (19)

Legend:
- Yellow
- Pink
- Dark Blue
- Light Blue
- Green
- Purple
Consideration

Japanese Certification System of WPM for export has been functioning smoothly.

The number of import inspection of WPM has been decreased from 2007 to 2013.

The awareness of ISPM 15 has been increased year by year in each country.
Status of wood packaging treatment & marking system in Korea

June 2014

Animal and Plant Quarantine Agency
1. Regulation
2. Status of WPM treatment
3. Operation of on line support system
4. HTC registration procedure
5. Management of HTC
6. Procedure of heat treatment
7. Marking system
8. Training
9. Challenge & Where to go
1 Regulation

a. ISPM No. 15(IPPC)

b. Plant Protection Act
   * Registration, Cancellation of HT service
     Violation & Penalty

c. Enforcement Regulation/PPA
   * How to register, registration requirement,
     administrative measures, compliance

d. Quarantine Requirements of WPM(Notice, 2002)
   * mark registration, monitoring, how to operate
Start HT for exporting WPM in 2001
Registered number of HTC(620), FC(28)
How to treat : HT(98.6%), MB(1.4%)
   - ‘13 HT : 71,962, MB : 981
Type of WPM : pallet, W/B, skid, dunnage, timber etc.
Operation of online support system on WPM
3 Operation of online support System

a. Registration of HT company/mark/staff/facility

b. Real time input HT schedule & result

a. Authority : QIA
b. Requirements for registration
   - Staff : one or more HT Technician
   - Facility : More than 20m³
   - Equipment : temperature sensor(2) & auto recording system, H & Ventilator
c. Application and registration
   - application to QIA Regional office → on site confirm → report to headquarter QIA → issuance of certificate & registration on line system
a. Classification: 4 class, differentiated treatment in regular check and training
b. Monitoring by Regional QIA office
   - Regular & spot check
     * base on Treatment schedule & temperature graph online system
c. Administrative measure on non-compliance
   - correction order, warning, business suspension
a. Application → HTC
b. Input treatment schedule online system by HTC
c. Execution of treatment loading → sensing → heating → measuring temp. and time
d. Report the result online system
e. Marking/Issuance of certi. by HTC
Outside & inside of HT facility
Heating system
Temperature recording system
Loading of WPM
Drilling and sensoring
Heating and opening
How to input HT result on System
How to issue HT certificate
7 Marking system

a. Use of mark after registration of treatment mark based on certificate
   - authorize registered number in each mark
b. Keep QR code on each mark
c. Maintain register book for movement of mark
Labeling of registered mark

[Image of Korean label with QR code and text]

[Image of another Korean label with QR code and text]
a. How to establish temperature sensor in facility (location, drilling and sealing)
b. How to obtain room during WPM HT
c. Use latent heat after 56°C/30 min.
d. Calibration (± 0.5 °C) of thermometer and probe (1 year)
   * Isolated storage after treatment
a. Limitation of checking due to lots of HTC and shortage of quarantine officer
b. Continuous administrative measures due to illegal use of mark including forgery and non declaration of new mark
c. Shortage of knowledge & skill due to frequent change job of HT technician
d. Requirements by importing country (marking, certificate, hitchhiking pest)
Thank you
<table>
<thead>
<tr>
<th>No</th>
<th>Name /address of accredited treatment agency</th>
<th>Type of treatment</th>
<th>Register No.</th>
<th>Name of Treatment operator/ Reg. ID.</th>
<th>Date of issues</th>
<th>Valid up-to</th>
<th>STATUS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>General Service Lao (GSL) 151 Thadeua Rd, Ban Haysok, P.O. Box 6371, Vietiane, Lao PDR Tel: 856 21 314190, 856 21 31282 Email: <a href="mailto:gslaos@gmail.com">gslaos@gmail.com</a></td>
<td>Fumigation PH, MB</td>
<td>001</td>
<td>NA</td>
<td>16/02/2006</td>
<td>16/02/2011</td>
<td>Withdrawn</td>
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<tr>
<td>2</td>
<td>KL Wood Processing Factory Co.Ltd Pakkading Distict, Borikhamxay province</td>
<td>Heat Treatment</td>
<td>002</td>
<td>NA</td>
<td>01/02/2009</td>
<td>01/02/2011</td>
<td>Withdrawn</td>
</tr>
<tr>
<td>3</td>
<td>FUMIGATION SERVICE CENTER Nam Huang Friendship Bridge, Ban Muang Mo, Kenthao District Sayabouly Province Lao</td>
<td>Fumigation PH, MB</td>
<td>003/80/XA/2014</td>
<td>Mr. Jeerasan Khuntayok 0001/3/080/XA/2014</td>
<td>No</td>
<td>02/02/2014</td>
<td>Approved</td>
</tr>
<tr>
<td></td>
<td>Tel: (856-20) 5551 4023, (856-20) 5564 7093 Fax: (856-074) 213210 Email:<a href="mailto:xayavong_xc1@yahoo.com">xayavong_xc1@yahoo.com</a></td>
<td></td>
<td></td>
<td>2. Mr. Phichit Promsri 0002/3/080/XA/2014</td>
<td></td>
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<td></td>
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<td></td>
<td>4. Mr. Anoucha Prakorbchai 0004/3/080/XA/2014</td>
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<td></td>
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<td>5. Terdtoonchai Pilaiwan 0005/3/080/XA/2014</td>
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</tr>
<tr>
<td>4</td>
<td>CHOKXAI AGRICULTURAL PROMOTION AND IMPORT EXPORT Co.Ltd Ban Muang Mo, Kenthao District Sayabouly Province Lao</td>
<td>Fumigation PH</td>
<td>004/80/XA/2014</td>
<td>Mr. Sombou Soulidate 0001/4/080/XA/2014</td>
<td>No</td>
<td>19/03/2014</td>
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</tr>
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<td></td>
<td>Tel/ Fax: (856-74 211 843)</td>
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<td>APS All Purpose Service Co.Ltd Tchomcheng Village, Sisathanak District, Vientiane Capital, Lao PDR Tel/ Fax: (856-30 777 5193) (856 -21 350165) Email: <a href="mailto:aps.serviceslaos@gamai.com">aps.serviceslaos@gamai.com</a></td>
<td>Fumigation PH, MB</td>
<td>005/LA/2014</td>
<td>Mr. Jean Philippe RAFFY 001/5/LA/2014</td>
<td>LA-003 MB</td>
<td>02/06/2014</td>
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<td>2. Mr Daoheuang Souriyasengkham 002/5/LA/2014</td>
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<td>3. Mr. Souksakhone Phisanukan 003/5/LA/2014</td>
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Note: Phosphide (PH), Methyl bromide (MB), Heat treatment (HT)
Not available (NA) ឈ្មោះ ឈ្មោះ
Implementation of ISPM No. 15 in Lao PDR
Adoption of ISPM No 15

1. Plant Protection Law No 06/NA dated 09/Dec/2008
2. Decree implementation of Plant Protection Law No 229/GOV dated 31 May 2012
4. Instruction on implementation of ISPM No 15 No 53/DOA.06 dated 23/JAN/2006
5. Notice on new revised of ISPM 15 No 1152/DOA.06 dated 27/AUG/2012

Related National Legislation
1. Regulation Pesticide Management of Lao PDR No 2860/MAF 11 JUNE 2010
Administration framework:

Accredited /Certified body:
Department of Agriculture (DOA)
(National Plant Protection Organization of Lao)

Audition/monitoring body:
Provincial Agricultural office
Technical Requirement and

Requirement
Organization and personal
Treatment protocol
Fumigation operator
Equipment and facility
Issuance of treatment certificate

1. Certification for treatment Agency with Registered number
2. Identification Card with Registered number for Treatment operator and Identification Card
3. Register mark number for Wood Packaging Material
Registered mark number for accredited treatment Agency

Approved

withdrawn
Treatment record

Service contract
Fumigation record
Fumigation certificate
Chemical storage/use record
MALAYSIA EXPERINCES IN IMPLEMENTING ISPM 15 OF THE WOOD PACKAGING MATERIAL (WPM)

YUSOF OTHMAN
PLANT BIOSECURITY DIVISION
DEPARTMENT OF AGRICULTURE
MALAYSIA
INTRODUCTION

- WPMs are made from raw woods and often untreated to mitigate pests
- They are the pathway to quarantine pests and pose high risk when the origin could not be ascertain and re-use by importing country for export
- IPM 15 provide the acceptable standard to mitigate risk associated with WPMs
- Approved treatment measures and specified mark (IPPC marking) are the basis for authorizing the entry of WPM without further requirements
Example of Regulated WPMs

- Pallets
- Wooden Cases
- Wooden Crates
- Wooden crates
- Wooden Crates
- Drums
- Dunage
MARKING
The marking proposed for Malaysia WPM

[Diagram showing marking with IPPC logo, MY - W0, MB / HT, and space for additional information.]
International Standards for Phytosanitary Measures No. 15

MARKING

ISPM no.15 Standard Marking

[Images of markings on wooden pallets]
Malaysia Experiences in Implementing ISPM 15 (1/3)

- Start registration treatment providers in 2004 (MB Fumigation and Heat Treatment) to facilitate export compliance and in place procedure to meet the requirements of the importing countries that implemented ISPM 15

- In that year, several road shows was conducted to all treatment providers and exporters on ISPM 15 and implementation procedure
In 2005, Malaysia joined Australian Fumigation Accreditation Scheme (AFAS).

Based on these standards, Malaysia established Fumigation (MAFAS).

Based on ISPM 15, Heat Treatment Accreditation Scheme (MATHAS) was established.

The SOP for the implementation of these schemes have been published as guidelines for officers and the treatment service providers.
Training on AFAS Standard was conducted in 2005 by officers from Australian Quarantine Inspection Services (AQIS) Australia to relevant DOA Officers and Treatment Service Providers.

These Treatment Providers that undergone the AFAS training also been accredited as AFAS competent service providers.

In 2007, Training were also conducted by DOA on Heat Treatment standard to DOA Officers and Heat Treatment Providers based on ISPM 15.
In 2009, road show to importers was conducted to inform them on the implementation of ISPM 15 for import.

Notification to WTO to inform trading partners on the implementation of ISPM 15 for import.

In 2010, Malaysia started the implementation of ISPM 15 for import.
Procedure for Registration of WPM Treatment Service Providers

- Application – company name, competent personnel, licenses, location and description of facilities

- Auditing – equipment, record keeping, practical competency, storage and safety
Approval on the Registration of WPM Treatment Service Providers

National Technical Committee for MAFAS and MAHTAS

Technical Advisors

Treatment providers

Auditors

National Main Accreditation Committee
Monitoring

- Registration number
- Treatment Batch Running Numbers
- Record Keeping
- Unannounced Audit
- Renewal Audit
- Notification from Importing countries
Non Compliance

- Investigation by auditors
- Suspension until Approved corrective measures
- Re-auditing
- Delisting from registration
Problem and Constraints (1/2)

- Difficult to Inspection non agriculture products that have WPM normally not inspected by Quarantine Inspector

- No Marking for the above WPM and treatment could not be conducted

- No expiry date of treatment especially for re-export

- Sampling is based on non-statistical method and only 10% of the accessible area.

- Forgery of WPM making difficult to trace especially when they use the other company valid registration number
Handling of WPM after treatment such as storage and transits

Lack of man power to conduct unannounced audit to ensure compliance to the standard especially on record keeping

Re-use and repairing of WPM by importing country for export did not comply to the making requirement and re-treatment
List of Approved Accredited Treatment Providers

- MB Fumigation – 79 Companies
- Heat Treatment – 44 Companies
- List registered approve service providers are published in www.doa.gov.my
THANK YOU
New Zealand’s ISPM 15 Experience

APPPC/NAPPO ISPM 15 Implementation Workshop
Beijing, June 2014

Shane Olsen
Manager Plant and Forestry
Plant Imports and Exports

GROWING AND PROTECTING NEW ZEALAND
Presentation Structure

1. Importance of good biosecurity for New Zealand
2. Export system – How New Zealand addresses trade challenges, including for wood packaging
3. Import process and Border Interventions
4. Import non-compliances
5. ISPM 15 Implementation Issues
Importance of Biosecurity for New Zealand

- New Zealand’s Economic dependence on high-quality agricultural & forestry sector

- Unique biodiversity
  - New Zealand retains significant native biodiversity which is estimated to be upwards of 80,000 indigenous species

- Emerging threats to human, plant, and animal health
  - Direct threats (pathogens and pests)
  - Indirect threats (such as supply chain activities)
An Integrated Approach

• Basis is IPPC principles and standards

• Opportunities for co-management of risks with & in conjunction with industries

• Opportunities to manage risks pre-border, at the border and post-border

• Careful design of interventions (transparent i.e. based on risk, technically justified and sufficient only to protect plant, animal or human life i.e. the least trade restrictive)
New Zealand’s Export System
MPI’s Export System

- System operates to provide official assurances to meet importing countries requirements and international standards

- Support the devolution of treatment, inspection & verification responsibilities to competent organisations

- Export Certification Options:
  - End Point Consignment Inspection
  - Approved Organisation Programme
The MPI Regulatory model for Export Certification

- **MPI**
- **Independent Verification Agencies (IVAs)**
- **Organisations**

Accountability: 

Delegation of Authority:
Roles & Responsibilities

Independent Verification Agencies (IVAs)
- Phytosanitary inspections.
- Risk assessments & auditing.
- Auditing and Supervision of phytosanitary treatments.
- Verification of certificate requests (phytosanitary)

MPI Approved Organisations (MAO)
- Phytosanitary security measures
- Phytosanitary inspections
- Treatments, including ISPM 15
- Application of the ISPM 15 certification mark
Registered ISPM 15 Service Providers

- New Zealand operates an approved ISPM 15 service provider programme
- MPI has a standard prescribing requirements for application of ISPM 15 mark
- Approved Treatment Providers
  - 70 registered HT providers
  - 23 registered MB providers
- Approved Application of the Mark
  - 75 registered stamp providers
Wood Packaging Export Challenges

- Verifying Compliance of Approved Providers
- Control of Application of the Mark
  - Ensuring traceability to complete WPM unit
- Ensuring treatments are conducted according to best practice
- Ensuring all exporters are using compliant WPM
New Zealand’s Import System
New Zealand Import Health Standards (IHS)

- Imports regulated under New Zealand’s Biosecurity Act
- IHS is a legal document that specifies the requirements to be met for the effective management of risks associated with the importation of risk goods
- Must be compliant with:
  - World Trade Organisation
  - International Plant Protection Convention
  - Domestic legislation (Biosecurity Act, 1993)
- Risk goods **cannot** be imported without an import health standard
IHS for Wood Packaging Material

- Import Health Standard (IHS) for Wood Packaging Material from All Countries
  - Basis of IHS is ISPM 15 requirements

- Wood packaging requires treatment:
  - Methyl bromide fumigation
  - Heat treatment

- Marked as per ISPM 15 Guidelines
New Zealand’s Cargo Pathway

- NZ receives approx. 660,000 sea containers/year
- Approx. 90% of all containers carry WPM (NZ survey data)
- Approx 90% is ISPM 15 compliant
- Estimated 60,000 containers/year contain some non-compliant or untreated wood packaging
MPI Transitional Facilities

• Nearly 5000 transitional facilities in NZ
  – Handle uncleared imported goods, including wood packaging

• Accredited Persons (APs) – trained to report any container or product infestation, including for wood packaging

Found Something?
To report suspected exotic disease or pests in animals, plants, fish or bees, call us on
0800 80 99 66
MPI Border Interventions for WPM

- All imported cargo declared using a Quarantine Declaration

- Includes specific question on whether there is wood packaging present in a consignment

- Import declaration also allows for treatment without ISPM mark e.g. treatment listed on a phytosanitary certificate
MPI Border Interventions for WPM

• Targeting of WPM that is non-ISPM 15 compliant or untreated based on shipment documentation
  - Inspection or treatment required
  - Aims to provide commercial driver for improving compliance

• Approx 10% of consignments with WPM may contain some WPM that is non-ISPM marked/treated

• Audit ISPM 15 compliant WPM (based on documentation) through random sampling
Wood Packaging Non-Compliances

- Pest contamination on WPM is low
- Few interceptions of significant forestry pests on imported WPM
- Some pest interception trends have been detected
  - Specific pathways, countries
- New focus on improving air container compliance
  - Relatively high level of non-compliance with ISPM 15
Sinoxylon unidentatum
Monochamus alternatus
Implementation Issues

• Control of ISPM mark in exports systems is paramount
  – Traceability from marked unit to treatment application

• Non-compliance reporting is necessary

• Focus for NZ is identifying non-compliant pathways
  – specific pathways, NOT one-off interceptions

• Emphasis on non-compliance reporting should be on identifying trends and non-compliant pathways
Conclusions

- New Zealand has significant export assurance system for meeting ISPM 15 requirements

- New Zealand has Import Health Standard for wood packaging material
  - Aligns with ISPM 15 standard, treatments
  - Target imports based on consignment information
  - Use industry to provide additional verification

- Occasional non-compliances detected specific to commodity & pathway, which are the focus for country-to-country notification
Thank you
PHILIPPINES:
ISPM 15 Implementation
Session II

Joan-May T. Mozo
Plant Quarantine Officer
Plant Quarantine Service
Bureau of Plant Industry
ISPM 15 Background

- Mid 1990’s – numerous countries record increasing interceptions of insect pests in untreated wood packaging material
- In 2002, the Interim Commission on Phytosanitary Measure (ICPM) of the IPPC approved ISPM no.15 “Guidelines for Regulating Wood Packaging Material in International Trade,” to address the risk of introduction and spread of quarantine pests that may be associated with the movement of wood packaging material
• BPI issued BPI Quarantine Administrative Order no. 1 series of 2004 with the same title to implement the said standard in the Philippines (Full Implementation Date: 01 June 2005)

• April 2009 at the CPM meeting in Rome, due to several demands to improve handling and clarify ambiguity of the text and actual implementation of the said ISPM, the revision of ISPM 15 was approved.

• In 2010 BPI issued BPI Quarantine Administrative Order no. 1 series of 2010 Revised Regulation for Wood Packaging Material in International Trade (Implementation date: 01 January 2011)
Approved Treatments

a. Methyl Bromide Fumigation

<table>
<thead>
<tr>
<th>Temperature</th>
<th>Dosage (g/m³)</th>
<th>Minimum concentration (g/m³) at:</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>2 h</td>
</tr>
<tr>
<td>21 °C or above</td>
<td>48</td>
<td>36</td>
</tr>
<tr>
<td>16 °C or above</td>
<td>56</td>
<td>42</td>
</tr>
<tr>
<td>10 °C or above</td>
<td>64</td>
<td>48</td>
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</table>

b. Heat Treatment

56°C for 30 minutes (wood core temperature)

Treatment procedure are in accordance to the Standard
Accreditation of Quarantine Treatment Providers

I. Fumigation Companies
   a. Licensed by the Fertilizer and Pesticide Authority
   b. Has the required fumigation and safety equipment
   c. Passed the actual test conducted by BPI

II. Heat Treatment Companies
   a. Has the required equipment for HT
   b. Passed the actual test conducted by BPI

<table>
<thead>
<tr>
<th>Accredited Fumigation Companies</th>
<th>Accredited HT Facilities</th>
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</table>
Green in color, spray painted, rubber stamped or any practical method, batch number and treatment date must be placed outside the border of the mark.
Control of the Mark

- Each accredited QTP has its own company code (which will be used in the mark)
- All treatments are being supervised by BPI-PQS*
- Use of the mark is registered in the Phils Intellectual Property Office (IPO), and shall abide by its rules and regulations
- It is the responsibility of the accredited QTP to ensure that treatments and markings are done according to the Standard.
Philippines Experience

• <5 notifications of WPM non-compliance received per year since 2005 - conduct of investigations; provide sanctions

• Strict compliance to QTP accreditation requirements

• Approaches for inspection: from Mandatory to Risk-based

• BPI regulation covers both import and export – coordination and cooperation with the Bureau of Customs (BOC)
Philippines Experience

- REUSED WPM with Markings
  - responsibility of the exporting country (exporter)
  - inspection for signs of infestation
  - proper storage
- non-issuance of Phytosanitary Certificate
- if PC is needed, remove previous mark, re-treat and place new mark
REPORT BY SINGAPORE

Agri-Food & Veterinary Authority
Implementation of ISPM No. 15 in Singapore

* Not implemented for import

* Implemented for export to meet importing countries requirements and facilitate trade

* AVA accredits treatment providers to perform fumigation and heat treatment under ISPM No. 15
Implementation of ISPM No. 15 in Singapore

* All 48 treatment providers under the Treatment Provider Scheme (TPS)

* Adherence to requirements stated in the Scheme with strong oversight by AVA
  
  - general requirements
  - documentation and records
  - submission of reports
  - technical competency
Implementation of ISPM No. 15 in Singapore

*Adherence to requirements stated in the Scheme ... continue

- training
- equipment
- technical requirements
- facility requirements
- product
- treatment monitoring
- issuance of treatment certificates
- treatment records
- audit and follow up
- routine compliance evaluation
Implementation of ISPM No. 15 in Singapore

*Adherence to requirements stated in the Scheme ... continue

- non compliances
- corrective actions
- suspension
- reinstatement
- termination
Sanction Measures for Non Compliances to TPS

Suspension for minimum 1 month
- Notice of “unacceptable status” or “improper treatment” from overseas country

- Occurrence of more than 3 major non compliances in one calendar year

- Failure to report changes made to treatment operations or implement without prior approval from AVA

- Conduct treatment without designated supervising personnel or trained treatment operator

- Conduct treatment without abiding by legislative requirements of other government agencies
Sanction Measures for Non Compliances to TPS

Suspension for minimum 1 month
- Non payment of audit service conducted by AVA
- Two critical non compliances in one calendar year
- Evidence of inactivity for six months
Sanction Measures for Non Compliances to TPS

Reinstatement
- Complies with all corrective actions, changes and conditions for reinstatement prescribed by AVA

- Desk and site audit by AVA

- Application for reinstatement processed after suspension period
Sanction Measures for Non Compliances to TPS

**Termination**
- Misuse of TPS certification mark or accreditation, falsification of the treatment certificate
- Fraud or misrepresentation of any records, declaration, statement
- Commits more than 3 critical non compliances in one calendar year
- Conditions for reinstatement from a suspension are not met within specified time
- Inactive for 12 months
- Treatment provider requests for termination
Challenges Encountered in Addressing Non Compliances

1. Limited resources available to check and audit

2. Time required to train technically competent staff

3. Promote appreciation/awareness on the importance of plant health and phytosanitary measures

4. Appeal against sanction measures
Non Compliances Notification

**Interceptions**

2011
- USA: 1
- Italy: 1
- Canada: 2
- Brazil: 5
- Australia: 4

2012
- USA: 1
- Malaysia: 1
- Greece: 1
- Germany: 2
- Australia: 2

2013
- Malaysia: 1
- Brazil: 16
- Germany: 1
Non Compliances Notification

Profile: Types of Non compliances associated with SWPMs from 2011-13

- Live pests: 5
- Undeclared timber: 2
- Soil detected: 2
- No ISPM 15 marking: 16
Non Compliances Notification

Observations

1. Some exporting companies are foreign companies

2. Inadequate information (i) only names and address of companies and the number of interceptions related to the companies stated, (ii) ISPM identifier (SG-02-HT-DB)

3. Notifications received at six months interval
Non Compliance Notification

Suggestions

1. Timely notification for effective corrective actions

2. Establish bilaterally (maybe) a timeframe for notification, corrective actions and report on corrective actions to reduce repeat non compliances by the same companies

3. Communication, besides thru IPPC contact point, with operational personnel as well
Non Compliance Notification

Suggestions

4. Adequate information provided for investigation:
   - Name and address of exporter
   - Mode and means of transport
   - Documents (bill of lading, phytosanitary/treatment certificate number if applicable, invoice)
   - Description of the SWPMs
   - Distinguishing marks on SWPMs
   - Quantity not in compliance
THANK YOU
Thailand Presentation
On
Country Experiences in
Implementing of ISPM No.15

Mr. Chusak Wongwichakorn
Senior Agricultural Research Specialist
Department of Agriculture
THAILAND
- Thailand has implemented ISPM No.15 for export since 2004
- Export Plant Quarantine Service
  Office of Agricultural Regulation
  Department of Agriculture
- Plant Quarantine Station
Procedure for Registration of WPMs Producers and Treatment Providers

- Meeting with the exporters, WPMs producers, Treatment Providers to facilitate understanding of ISPM No.15
- Auditor’s Training
  - ISPM No.15
  - Australian fumigation accreditation scheme (AFAS)
  - Heat Treatment
Documentation for registration

- Application Form
- Audit Check lists for MB and HT
- Registration form for approved accredited WPMs producers
Auditing for registration

- Application – company name, address, license, competent personal, location
- Auditing – location, equipment, facilities, storage area, safety, demonstration of treatment
- Understanding of ISPM No.15
MB auditing

- License fumigator
- Equipment
- Fumigation meet the standard
- Safety
HT auditing

- Competent personal
- Heat chamber
- Equipment
- Treatment meet standard
Approval

- Auditor submit all the documents to the technical committees
- Technical committees consideration for approval
Issuance of Registration Form

• Approval WPMs producers or Treatment provider will get DOA Registration form
• Registration valid for 1 year
• Authorize signed by DOA
ใบสำคัญการขึ้นทะเบียนผู้ผลิต
วัสดุป้องกันอันตรายจากหมัดของ IPC

ในส่วนนี้หากได้รับการรับรองว่า.................................................. ฉันได้ติดต่อข้อความในส่วนนี้
ดีมาก.... ผู้ขอ.. .................................................. ท่าน........................................

(ลงชื่อ).................................................. หัวหน้าเจ้าหน้าที่
(..................................................) ผู้ทุ่มเท

TH - 000
HT/MB
Monitoring

- Validity of Registration
- Record keeping
- Unannounced Audit
- Non-compliance notification
- Treatment demonstration
Non - Compliance

• Warning
• Suspension and corrective action require (CAR)
• Withdraw
Problem and Constraints

- Thailand haven’t implemented ISPM No.15 for importation
- Lack of auditors to conduct unannounced audit
- Fraudulent records
- No record keeping
- Treatment were not in standard
- Invalid registration number
List of Approved Accredited WPMs producers and Treatment Providers

• MB Fumigation – 470 companies
• Heat Treatment – 345 companies
• The list of registered approved WPMs producers and Treatment Providers are published in www.doa.go.th
THANK YOU
THE USDA EXPERIENCE OF ISPM 15

An Overview of the U.S. Implementation of the International Wood Packaging Regulations for Exports and Imports
Three Tier Audit Program—Heat Treatment Program

- **Inspection Agencies audit Manufacturers**
  - Monthly check for: work plan compliance, review of heat chamber records, and inspection of HT lumber

- **ALSC audits Inspection Agencies**
  - Monthly for: work plan compliance, consolidated reports, and Quality Control procedures
  - On-site audits of Manufacturers with Inspection Agencies

- **APHIS audits ALSC and Inspection Agencies**
  - Semi-annually for compliance with MOU
  - Periodic Field Audits of Manufacturers with Inspection Agencies
Summary of How the ALSC System Enables WPM to be Labeled Heat Treated in Compliance with the ISPM 15

Department of Commerce

PS 20-American Softwood Lumber Standard

ALSC

Board of Review

Accredits Heat Treated Lumber Agency

Provides Service to HT Lumber Producer

- Manufactures and subjects lumber to heat treating process
  labeling lumber HT
  or
  - Remanufactures ALS agency HT grade marked lumber labeling product HT

Accredits WPM Agency

Provides Service to WPM Producer

WPM producer purchases ALS agency HT labeled lumber and builds HT WPM with this lumber

WPM producer builds WPM from non-heat treated lumber

WPM producer places WPM in heat chamber and heats WPM to achieve 56⁰/30 min

WPM producer can label WPM as heat treated in compliance with ISPM 15
Attachment A:

Typical Marks of the 30 ALSC Accredited Untreated Agencies Placed on Lumber Indicating the Lumber Has Been Heat Treated In Compliance With ISPM 15

- Accredited agency insignia
- HT designation signifying lumber has been heat treated to 56°C for at least 30 minutes
- Unique number assigned to the producer of the HT lumber
Organization of Fumigation Program

National Wooden Pallet and Container Association

5 Inspection Agencies

84 Enrolled Manufacturers

USDA APHIS PPQ
Use of ISPM 15 Compliant WPM

- WPM that is marked and certified in compliance with ISPM 15 may be reused regardless of country of origin.

- ISPM 15 compliant WPM that has been repaired or remanufactured must be recertified under the HT or fumigation option.
Import Regulations

Wood packaging materials in the United States are regulated under 7 CFR 319.40-3 in the Code of Federal Regulations
WPM Enforcement

Homeland Security Inspections by Customs and Border Protection (CBP)

- Target through manifest review
- Physical inspection of shipments
- 2,000 Agriculture Specialist
- 18,000 Cross-trained CBP inspectors
What happens to non-compliant shipments that enter the US?

At the expense of the importer:

- WPM that does not have the ISPM 15 stamp must be re-exported
- WPM that has the ISPM15 stamp but is found to contain a wood boring pest must be re-exported
- WPM that has the ISPM 15 stamp but is found with a hitchhiking pest (non wood boring) may be fumigated by APHIS/PPQ
What happens to non-compliant shipments that enter the US?

At the election of the Dept of Homeland Security:

- A Port Director may allow the cargo to be separated from the non-compliant WPM that must be re-exported IF pest risk permits separation of WPM from cargo and IF they have the resources (staff and overtime) to oversee the reconditioning

- Otherwise both WPM & cargo will be re-exported
# Annual Interception Total

## Count from 4/1/2013 - 5/27/2014

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<tr>
<th>Row Labels</th>
<th>Count of Serial Number</th>
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<tr>
<td>Non Compliant-No Markings</td>
<td>2735</td>
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<tr>
<td>Non Compliant-Timber Pest</td>
<td>871</td>
</tr>
<tr>
<td>Grand Total</td>
<td>3627</td>
</tr>
</tbody>
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## WPM with Pests

<table>
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<tr>
<th>Row Labels</th>
<th>Pest</th>
<th>Pest, Lacking ISPM 15 Marking</th>
<th>Pest, Lacking ISPM 15 Marking, Contaminant - Seed</th>
<th>Grand Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Both NC for No Markings and Timber Pest</td>
<td>12</td>
<td>2</td>
<td></td>
<td>14</td>
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<tr>
<td>Non Compliant-No Markings</td>
<td>29</td>
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<td></td>
<td>46</td>
</tr>
<tr>
<td>Non Compliant-Timber Pest</td>
<td>851</td>
<td></td>
<td></td>
<td>851</td>
</tr>
<tr>
<td>Grand Total</td>
<td>892</td>
<td>15</td>
<td>4</td>
<td>911</td>
</tr>
</tbody>
</table>
Challenges of Program

• Dunnage from bulk carriers
• Identifying shipments for inspection
• Insuring education of all sectors of industry
  – Past Practices
  – Current Practices
• Non-agricultural shipments
Resources Used

• From 1997 – 2006 the initial cost of ALB eradication was $800 million
• EAB was first found in 2003
  – By 2011 trees cut exceeded 50 million
Joint Inspection

- Legal boundaries
- Piloting of information sharing
Fraudulent Stamps

- Portsmouth Virginia
Fraudulent Stamps

- Portsmouth Virginia
Noncompliant Stamp
Noncompliant Stamp
Noncompliant Stamp
If you would like a copy of this presentation, please send me an email:

john.t.jones@aphis.usda.gov

Thank you for your attention!
COUNTRY REPORT ON
APPLICATION STATUS OF ISPM 15: “REGULATION OF WOOD PACKAGING
MATERIAL IN INTERNATIONAL TRADE” IN VIETNAM

DUONG MINH TU

Beijing, June 10-14, 2014
At this time, the Vietnamese legislation focusing on regulation of wood packaging material in international trade are included:

1) Ordinance on Plant Protection and Quarantine (2001);

2) Government Decree on Plant Quarantine regulation (2007);

3) Decision No. 89/2007/QD-BNN 01/11/2007 of the Minister of Agriculture and Rural Development on state management Regulations for fumigation operation of regulated articles;

4) National technical regulation on fumigation procedures (QCVN 01-19:2010/BNNPTNT);

4) National technical regulation on wood packaging material in international trade (QCVN 01-2: 2009/BNNPTNT)
The main contents of technical regulation on wood packaging in international trade (QCVN 01-2: 2009/BNNPTNT) are as follows:

1. **Scope**
   This norm prescribed limits of the remedial measures for wood packaging material (including dunnage map) in international trade.

   This norm does not apply to wood or wood products processed such as pressed wood, plywood, sawdust, wood chips, industrial plywood, wood shavings or a thickness not exceeding 6 mm.

2. **Subjects of application**
   This norm applies to organizations and individuals practicing fumigation or heat treatment of wood packaging material in international trade organizations and other individuals involved.
3. General requirement
3.1. Equipment requirements for heat Treatment
The heat treatment system for wood packaging material to ensure adequate equipment as prescribed, including:

a/- Handling areas
- Heat treatment chamber suitable scale and handle is sealed with appropriate materials and insulation capable to withstand high temperatures during processing. Ability heat sink evenly throughout the processing chamber space.
- Fans island air circulation in the chamber air handling

b/-Division provides heat
Boilers or steam heating equipment or equivalent devices must satisfy the minimum thermal efficiency increases as prescribed.

c/- Temperature control valve
There are functions for temperature control chamber temperature increased to handle the implementation of the value set.
d/- The sensor probe
The function to measure the temperature in the core timber at the center point representation (5 points) in the processing chamber.

e/- Control unit processes
- Display device wood core temperature at the center;
- Increased temperature control equipment;
- Equipment to heat up now.

f/- Equipment temperature records
Including the sensor probe thermometer in center of wood core for a period of time from when you open the meter when the heat treatment temperature to finish.

h/- Other auxiliary equipment
- Lighting system;
- Drill;
- Dedicated cars.
3.2. Equipment requirements for Methyl Bromide fumigation
- Fumigants;
- Fumigation sheets;
- Sealing materials: paper, glue, nylon, clamps, tape, sand snakes;
- Balance drugs: 50kg, 100kg;
- Opener drugs, drug bags, pipes;
- Gauge steam drug concentrations;
- Gas-masks specialized tools and labor protection;
- Equipment airy, island atmosphere: fans, vents, air turner;
- Gauge thermometer;
- Check the time clock;
- Hazard notice by Vietnamese or English (used for disinfecting objects for export);
- equipment for preventing fire and explosion;
- Tools Aid for labor accidents;
- Other instruments.
4. Technical Requirements

4.1. Heat Treatment
Wooden packaging material treated with this method to ensure temperature and specific time to reach minimum temperature is 56°C at the center of heartwood within 30 minutes.

4.2. Fumigation with Methyl Bromide
Wood packaging materials are fumigated with methyl bromide to ensure minimum conditions: air temperature is not less than 10°C, Monitoring time is 24 hours. Concentration at the times of standard test are 2, 4, 12 and 24 hours to ensure as Table 1:
Table 1. Concentration at the time of the standard test

<table>
<thead>
<tr>
<th>Temperature (°C)</th>
<th>Dosage (g)</th>
<th>Minimum concentration (g/m³) at the time of the standard test</th>
</tr>
</thead>
<tbody>
<tr>
<td>≥21</td>
<td>48</td>
<td>36 31 28 24</td>
</tr>
<tr>
<td>≥16</td>
<td>56</td>
<td>42 36 32 28</td>
</tr>
<tr>
<td>≥10</td>
<td>64</td>
<td>48 42 36 32</td>
</tr>
</tbody>
</table>
Sample mark
Form to be used according to rules agreed to apply two measures:

4 cm

10 cm
Signs include the following:

- Symbols of the International Convention on Plant Protection (IPPC);
- Country code consists of two letters, the numbers next to the Plant Protection Department for the organizations and individuals are eligible to practice handling wood packaging materials;
- The ink color blue, not affected by the external conditions do fade or blur.
Signs in practice (example)
## LIST OF LICENSED FUMIGATION COMPANIES AND ELIGIBLE SERVICE PROVIDERS ISPM NO.15 IN VIETNAM

<table>
<thead>
<tr>
<th>No.</th>
<th>Name of Company</th>
<th>Contact</th>
<th>ISPM 15 Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Termite Control &amp; Fumigation Company</td>
<td>31B Hai Trieu Street, Dist1, HoChiMinh City, Vietnam</td>
<td>VN - 001 MB</td>
</tr>
<tr>
<td>2.</td>
<td>Saigon Fumigation Center - SFC</td>
<td>2/29 Ham Nghi Street, HoChiMinh City, Vietnam</td>
<td>VN - 004 MB</td>
</tr>
<tr>
<td>3.</td>
<td>Hanoi Enterprise For Agro- Forestry Products</td>
<td>64 Bach Dang Street, Hoan Kiem District, Hanoi Capital, Vietnam</td>
<td>VN - 002 MB</td>
</tr>
<tr>
<td>4.</td>
<td>Toan Dien Trading and Service Co., Ltd.</td>
<td>119/2 Dien Bien Phu – District 1 – HoChiMinh City, Vietnam</td>
<td>VN – 003 MB</td>
</tr>
<tr>
<td>6.</td>
<td>Southern foodstuff joint Stock Company</td>
<td>92-94 Ly Thuong Kiet Str, Tan Binh District, HoChiMinh City</td>
<td>VN - 005 MB</td>
</tr>
<tr>
<td>8.</td>
<td>The Vietnam Superintendence and Inspection Joint Stock Company (VINA CONTROL)</td>
<td>54 Tran Nhan Tong, Hanoi, Vietnam</td>
<td>VN - 007 MB</td>
</tr>
<tr>
<td>9.</td>
<td>CAFE CONTROL</td>
<td>228^ Pasteur – District 3 – HoChiminh City</td>
<td>VN - 008 MB</td>
</tr>
<tr>
<td>10.</td>
<td>Vietnam Fumigation Company - VFC</td>
<td>29 Ton Duc Thang Str., Dist. 1, HoChiminh City, Vietnam</td>
<td>VN - 009 MB</td>
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</table>

^ The code 228 refers to the specific area or district within Hochiminh City.
<table>
<thead>
<tr>
<th>No.</th>
<th>Company Name</th>
<th>Address</th>
<th>License No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>11.</td>
<td>FCC Control and Fumigation Joint Stock company</td>
<td>45 Dinh Tien Hoang Street, District 1, Ho Chi Minh City, Vietnam</td>
<td>VN - 010 MB</td>
</tr>
<tr>
<td>13.</td>
<td>Ba Ria- Vung Tau Fumigation &amp; Termite treatment Station</td>
<td>243/2 Binh Gia - ward 8 – Vung Tau City, Ba Ria – Vung Tau province</td>
<td>VN - 012 MB</td>
</tr>
<tr>
<td>14.</td>
<td>Sai Gon Fumigation &amp; Termite treatment Co., Ltd.</td>
<td>16 Doan Van Bo block, Distric4, Ho Chi Minh City, Vietnam</td>
<td>VN - 013 MB</td>
</tr>
<tr>
<td>15.</td>
<td>Ha Thanh Binh – Thanh Hoa Investment and Development Company</td>
<td>No 08/171 Le Thanh Tong, Dong Ve ward, Thanh Hoa city, Thanh Hoa province</td>
<td>VN – 001 HT</td>
</tr>
<tr>
<td>16.</td>
<td>Nam A Company Ltd.</td>
<td>Block 16, Que Vo Industrial area, Bac Ninh province</td>
<td>VN - 002 HT</td>
</tr>
<tr>
<td>17.</td>
<td>Nhiet Sinh Thai Trade Service one member Limited Co.</td>
<td>Room 207, Second floor, Hai Thanh tower, number 2 Thi Sach, Ben Nghe, Distric 1, Ho Chi Minh city</td>
<td>(Expired)</td>
</tr>
<tr>
<td>18.</td>
<td>NamViet Fumigation Joint Stock Company</td>
<td>69/21- Street D2, Ward 25, Binh Thanh District, Ho Chi Minh city</td>
<td>VN - 014 MB</td>
</tr>
<tr>
<td>20.</td>
<td>Sao Viet Fumigation Co., Ltd.</td>
<td>No 30 Pham Viet Chanh, ward 19, Binh thanh Distric, Ho Chi Minh city</td>
<td>VN - 016 MB</td>
</tr>
<tr>
<td>No.</td>
<td>Company Name</td>
<td>Address</td>
<td>Phone/Fax</td>
</tr>
<tr>
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<tr>
<td>21.</td>
<td>Au Chau Trading and Service Co., Ltd.</td>
<td>31 Van Kiep, ward 3, Binh Thanh District, Ho Chi Minh city</td>
<td></td>
</tr>
<tr>
<td>22.</td>
<td>Sai Gon Plant Protection one member Co., Ltd.</td>
<td>Ward 1, Tan Thuan Dong, District 7, Ho Chi Minh city</td>
<td></td>
</tr>
<tr>
<td>23.</td>
<td>SGS Vietnam Ltd.,</td>
<td>No. 119 – 121, Vo Van Tan st., ward 6, District 3, Ho Chi Minh city – Viet Nam. Phone: +84 8 39351920 Fax: +84 8 39351922</td>
<td></td>
</tr>
<tr>
<td>24.</td>
<td>Gia Hoang Ltd.,</td>
<td>12/1/14 -35, 9, Tan Phong, Bien Hoa, Dong Nai province</td>
<td></td>
</tr>
<tr>
<td>25.</td>
<td>Branch of ITS Vietnam Ltd.</td>
<td>1st Floor, E.Town EW Building, 364 Cong Hoa Street, Ward 13, Tan Binh District, Ho Chi Minh City</td>
<td></td>
</tr>
<tr>
<td>28.</td>
<td>Vung Tau Fumigation &amp; Termite treatment Co., Ltd.</td>
<td>252A Thong Nhat, 8, Vung Tau, Ba Ria Vung Tau</td>
<td></td>
</tr>
<tr>
<td>29.</td>
<td>Vung Tau Fumigation &amp; Termite against Co., Ltd.</td>
<td>12/5 Ba Huyen Thanh Quan, precinct 4, Vung Tau, Ba Ria -Vung Tau province</td>
<td></td>
</tr>
<tr>
<td>30.</td>
<td>ECO2 Vietnam</td>
<td>Road NA5 Lot B-11A2-I My Phuoc II Industrial zone, Ben Cat, Binh Duong province.</td>
<td></td>
</tr>
<tr>
<td>No.</td>
<td>Company Name</td>
<td>Address</td>
<td>License No.</td>
</tr>
<tr>
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<td>-------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>31.</td>
<td>Dang Nguyen Joint Stock Company</td>
<td>Number 9, Binh Trung road, Binh Tay, Distric 2, Ho Chi Minh city</td>
<td>VN – 26 MB</td>
</tr>
<tr>
<td>32.</td>
<td>Oriental Mediterranean Shipping &amp; Trading Co., LTD</td>
<td>Room :407-211 Khaivan Building 92 Nam Ky Khoi Nghia Str. Dist.1 Ho Chi Minh City- Vietnam Tel: 84 8 39144966 - 84 8 38216221 Fax : 84 8 38218875 Email: <a href="mailto:omsc@hcm.vnn.vn">omsc@hcm.vnn.vn</a></td>
<td>VN- 027 MB</td>
</tr>
<tr>
<td>33.</td>
<td>Cotecna Vietnam Co., Ltd.</td>
<td>04th Floor, Dinh Le Building No. 01 Dinh Le Street, Ward 12, District 4 Ho Chi Minh City - Vietnam T +84 8 3943 3299 F +84 8 3943 4774 E <a href="mailto:cotecna.hcmc@cotecna.com.vn">cotecna.hcmc@cotecna.com.vn</a> <a href="http://www.cotecna-vietnam.com">www.cotecna-vietnam.com</a></td>
<td>VN-028 MB</td>
</tr>
<tr>
<td>34.</td>
<td>Vietnamcontrol Inspection Fumigation Joint-Stock Company</td>
<td>No. 281/7 Dat Moi Street, Binh Tri Dong A Ward, Binh Tan District, Ho Chi Minh City, Viet Nam</td>
<td>VN-029 MB</td>
</tr>
<tr>
<td>35.</td>
<td>Vi Vi Co., Ltd.</td>
<td>5/5 E Duong Cong Khi St, 1st Hamlet, Xuan Thoi Thuong Ward, Hoc Mon Distric, Ho Chi Minh, Vietnam Tel +84 8 3713 6444. Fax: +84 8 37135045 Email. <a href="mailto:Palletvivi@gmail.com">Palletvivi@gmail.com</a></td>
<td>VN - 012 HT</td>
</tr>
</tbody>
</table>
Law on Plant Protection and Quarantine had been enacted at the end of 2013 and will come to enforcement at first day of January 2015; therefore, all of the legislation documents under the Ordinance on Plant Protection and Quarantine (2001) are being reviewed, modified and developed in 2014. These legislation documents will also come to enforcement at the same time with the Law.

There are some articles of Chapter III (Regulations on Plant Quarantine) of the Law on Plant Protection and Quarantine (2013) focus on regulation of wood packaging material in international trade as follows:

1) **Article 34.** Quarantine treatment for import, export and in transit regulated articles: (Item 2: Quarantine treatments are included fumigation, heat treatment, vapor heat treatment, irradiation, etc.);

2) **Article 36:** Quarantine treatment profession for regulated articles are included fumigation, heat treatment, vapor heat treatment, irradiation, etc.;
3) **Article 37.** Conditions for issuing the Certificate of Eligibility to practice on plant quarantine treatment for regulated articles (Item 1: condition on infrastructure and technique; Item 2: condition on man power);

4) **Article 38.** Records, procedures and authorization for issuing the Certificate of Eligibility to practice on plant quarantine treatment;

5) **Article 39.** Record, procedure and process for re-issuing the Certificate of Eligibility to practice on plant quarantine treatment for regulated articles;

6) **Article 40.** Validity of the Certificate of Eligibility to practice on plant quarantine treatment for regulated articles (5 years);

7) **Article 41.** Revocation of the Certificate of Eligibility to practice on plant quarantine treatment for regulated articles.

8) **Article 42.** Rights and obligations of organizations practicing on plant quarantine treatment.
THANK YOU VERY MUCH FOR YOUR KIND ATTENTION
ISPM 15 – Australia’s import policy

Dr Chris Howard
Policy Officer
Biosecurity Plant Division
Australian Government Department of Agriculture

ISPM 15 Implementation Workshop, Beijing, June 2014
Australian Government Department of Agriculture

Previously known as the Department of Agriculture, Fisheries and Forestry

Department of Agriculture

Biosecurity Plant Division

- Biosecurity Animal Division
- Food Division
- Trade and Market Access Division
- Governance Division
- and others

Plant Biosecurity Branch

Plant Import Operations

Plant Export Operations
Australia’s international obligations

Australia is a member of the WTO and signatory to the IPPC.

Trade operates under the SPS agreement and associated international standards.

SPS agreement - sovereign right of any member country to impose phytosanitary measures above those detailed in the ISPMs.

Technical justification is required.
Australia’s adoption of ISPM 15

Australia adopted ISPM 15 in 2004.

Pre 2004 - Australia had stringent requirements for wood packaging:

- Total bark freedom
- Fumigation - MeBr, SO₂F₂, EtO
- Heat treatment
- Irradiation
- Permanent timber preservative treatments

Present - together with ISPM 15, non-ISPM 15 WPM is still accepted provided it has had a certified treatment.
Recent revisions to Australian ISPM 15 policy

Bark tolerance

- Australia maintained a policy of total bark freedom while it considered the 2009 revision of ISPM 15.
- After review, Australia’s insistence on bark freedom was relaxed in 2010 and the revised standard was adopted.
Recent revisions to Australian ISPM 15 policy

Blue Stain Fungi (BSF)

2008 - BSF on wood packaging was routinely being detected on ISPM 15-certified wood packaging during border inspections.
Blue Stain Fungi

Caused by dematiaceous fungi that infect the sapwood of trees.

Staining usually occurs after felling.

Several morphologically similar fungal genera are associated with Blue Stain:

- **Ophiostoma, Ceratocystis, Leptographium, & a few others.**
- All characterised by long-necked perithecia.
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- All characterised by long-necked perithecia.

Some BSF-related species are known pathogens.
Recent revisions to Australian ISPM 15 policy

Blue Stain Fungi (BSF)

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Plant Import Operations sought advice about what to do when BSF is detected.
Blue Stain Fungi (BSF)

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Plant Import Operations sought advice about what to do when BSF is detected.

Interim advice –

ISPM 15-certified wood packaging should be treated, re-exported or destroyed when active BSF detected (when perithecia were observed).

Pathogenic fungi within the BSF complex + the debatable effectiveness of ISPM 15 treatments for fungi.
Recent revisions to Australian ISPM 15 policy

Blue Stain Fungi (BSF)

2012 - Plant Biosecurity reviewed the current policy about active blue stain fungi on ISPM 15 wood packaging.
Blue Stain of Wood Packaging

Issues considered during BSF policy review:

- Poor knowledge of what species of BSF Australia has – native or established exotics.
- Morphological identification time consuming.
- Molecular methods reliant on accurate databases.
- Experts agree that without importation of vector, wood packaging is not a pathway for BSF (IFQRG 2011).
  - Unknown what role native bark beetles may play.
- How WPM is targeted for inspection.
Recent revisions to Australian ISPM 15 policy

Blue Stain Fungi (BSF)

2012 - Plant Biosecurity reviewed the current policy about active blue stain fungi on ISPM 15 wood packaging.

Australia determined that the risk of BSF was acceptable and no further intervention was required.

Targeting BSF on wood packaging was unduly trade restrictive.
Australia accepts ISPM 15-certified WPM and other WPM if treated according to appropriate import conditions.

During border surveillance operations, non compliant WPM will be treated, reexported, or destroyed.

Adopting ISPM 15 and other schemes for WPM allows resources at the Australian border to be directed to other areas of greater risk.
ISPM 15 Compliance in Australia

Peter Creaser, Director, Grain and Seed Exports Program
Beijing, June 2014
Non-Compliance: Imports
Overview

- Since January this year, the Australian IPPC contact point has received notification of 24 ISPM 15 related non-compliances for imports into Australia.
- Live insects in wood packaging and the incorrect use of the ISPM 15 mark are the most common types of non-compliance.
- The types of commodities that accompany the wood packaging material are mostly used for construction or electrical applications.
Number of non-compliances reported to NPPO 2009-2014
Number of ISPM 15 non-compliance reported to NPPO 2009 to 2014

<table>
<thead>
<tr>
<th>Year</th>
<th>2009</th>
<th>2010</th>
<th>2011*</th>
<th>2012</th>
<th>2013</th>
<th>2014**</th>
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<td>78</td>
<td>18</td>
<td>59</td>
<td>42</td>
<td>24</td>
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</table>
Compliance checks for ISPM 15

✓ Import broker accreditation schemes (trained to government requirements)
✓ Quarantine approved premises (trained staff at receiving depots)
✓ Documentary assessment
✓ General Inspection and specific commodity work instructions
✓ Direction for full inspection if documents not compliant
✓ Cargo compliance verification surveys (target 1-5% of goods)
✓ Routine commodity inspections also look at packaging
✓ General surveillance of landed goods and packaging on wharf
What happens with non-compliant goods?

- Reports to the ACPPO in cases of system failures
- Reported to exporting country NPPO
- Wood packaging destroyed, returned or treated if there are biosecurity concerns
- Supplier/importer profiles are developed
- Full unpack & inspections for next five consignments
- Targeted surveys and profiles as required for emerging issues and trends ie. imports considered high risk
What is happening now?

✓ Continued monitoring on:
  ➢ High risk import pathways
  ➢ High risk commodities
  ➢ High

✓ Database, systems and legislation being upgraded to better capture and report biosecurity incidents.

✓ Better records and reports will capture more specific data on ISPM 15 non-compliance
Non-Compliance: Exports
Overview

• The Department of Agriculture receives only up to four non-compliance export notifications each year.

• Majority of these notifications are due to no ISPM 15 mark on the wood packaging material.
Responding to ISPM 15 Non-Compliances

1. Notification from country NPPO on non-compliance received by the Department of Agriculture IPPC Secretariat.

2. Details of non-compliance entered into the NPPO non-compliance database.

3. The NPPO non-compliance for ISPM 15 is allocated to the relevant program area to determine appropriate course of action.

4. Outcome entered into the non-compliance record to finalise the entry in the database.

5. The country NPPO is notified on the course of action undertaken and exporter explanation for non compliance.
Unapproved use of the ISPM 15 mark

- The IPPC certification symbol is a registered trade mark in Australia.

- The Department of Agriculture approves use of the ISPM 15 mark and does so through certification under the AWPCS.

- Failure to comply with the requirements of the AWPCS will result in immediate revocation of a facility’s certification.

- Misuse of the ISPM 15 certification mark by those not certified under the AWPCS is:
  - An infringement under Australia’s Trade Marks Act 1995;
  - Misleading and deceptive conduct under the Trade Practices Act 1974

- Prosecution can take place under this legislation.
Case Study: Fraudulent use of ISPM 15

Issue: ISPM stamp acquired or copied from another packaging manufacturer that had deregistered

- Inside informant has passed information to the department

Procedure:

- Background information collated

- Investigations and Enforcement Officer to compile case and propose action:
  - Investigate premise
  - Recover evidence – remove stamp, stamped packaging
  - Interview facility owner

- Prepare case for prosecution in court of law under Trade Marks Act 1995 or Trade Practices Act 1974
What could be done to improve compliance?

• New round of communications to promote ISPM 15 to industry

• Communicate prosecution pending outcome

• Could there be better use of technology to reduce risk of fake stamps?
  ➢ Unique identifier/scannable code embedded in mark

• Are there other means of registering and auditing establishments for ISPM 15 that will improve transparency and accountability?
Thankyou

Peter Creaser
Director Grain and Seed Export Program
Plant Export Operations
peter.creaser@agriculture.gov.au

www.agriculture.gov.au
Investigation and Analysis on Notifications of Non-compliance Wood Package of Export Cargos

Standards and Technical Regulation Research Center, AQSIQ
2014.6
Abstract

ONE
Procedure for Handling Notifications of Non-compliance Wood Package of Export Cargos

TWO
Investigation and Analysis on Notifications of Non-compliance Wood Package of Export Cargos
1. Procedure for Handling Notifications of Non-compliance Wood Packaging Materials of Export Cargos

Receive and input the notifications by the Department of Supervision on Animal and Plant Quarantine

Receive and Circulate the notifications by CIQs directly under AQSIQ

Branch bureau carries out investigation and reports to CIQs directly under AQSIQ

CIQs directly under AQSIQ make review and feedback through the information platform

The Department of Supervision on Animal and Plant Quarantine deal with the investigation results
1.1 Receive and input notifications

- AQSIQ receives notifications through IPPC contact points, embassies in China, etc.
- Translate, edit and input the information of notifications into the information platform and circulate it to CIQs directly under AQSIQ
1.2 Transmit Information

- Register information
- Issue the document to branch bureau
1.3 Carry out investigation

- According to the information of the notification, determine target enterprises
- Retrieve company records, and take field trips to learn about the real status of the enterprises
- Analyze the reasons why the wood packages are notified, and adjust regulatory measures
1.4 Submit investigation results

- CIQs submit the investigation results to AQSIQ.
- Way to submit: feed back the investigation results through the Information System
1.5 Handle the investigation results

• Inform the importing country about the feedbacks

• Summarize the feedbacks and adjust regulatory measures
2. Investigation and analysis on non-compliance notifications

- **Scope of investigation:** 2012-2013 Noncompliance of Wood Package of Export Cargos from China notified by foreign countries fed back by CIQs

- **Overview:** 15 countries
  - 6 types of products
  - 18 CIQs
  - 3 types of reasons of notifications
  - 5 types of reasons notified
2.1 Notification Countries

Source countries of notifications on Wood Package

- Number of countries: 15
- Major countries: the United States, Germany, Israel, Brazil, the Netherlands, Australia, etc.
2.2 Types of products

Types of wood packaging products notified:

- Wood package and materials
- Mechanical and electrical products and components
- Metallic materials and products
- Stone and products
- Household items
- Vehicles and parts
- No names or types of products

A -- Wood package and materials
B -- No names or types of products
C -- Mechanical and electrical products and components
D -- Metallic materials and products
E -- Stone and products
F -- Household items
G -- Vehicles and parts
### 2.3 CIQs

Number of CIQs : 18  
Major CIQs: Shandong, Guangdong, Shenzhen, Xiamen, Zhejiang, Tianjin, etc.

<table>
<thead>
<tr>
<th>Location</th>
<th>Count</th>
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</thead>
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<td>Shandong</td>
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<td>Xin Jiang</td>
<td>2</td>
</tr>
<tr>
<td>Hu Bei</td>
<td>1</td>
</tr>
<tr>
<td>Jiang Xi</td>
<td>1</td>
</tr>
<tr>
<td>Inner Mongolia</td>
<td>1</td>
</tr>
</tbody>
</table>
2.4 Reasons of notifications

Reasons why wood packages were notified:
- No ISPM15 marks/unqualified marks
- Pests found (such as living, eggs, wormhole), objects prohibited from entering into the country (such as bark, etc.)
- Other reasons (such as nonconformity with the quarantine procedures of importing countries, etc.)

<table>
<thead>
<tr>
<th>Reason</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>51%</td>
</tr>
<tr>
<td>B</td>
<td>39%</td>
</tr>
<tr>
<td>C</td>
<td>10%</td>
</tr>
</tbody>
</table>

A -- No ISPM15 marks/untreated WPM/unqualified marks
B -- Pests found, objects prohibited from entering into the country (such as bark, etc.)
C -- Other reasons
2.5 Reasons notified

Reasons why wood packages were notified:

- Unfamiliar with ISPM15 standard by the enterprises
- Fake information by export enterprises
- Improper storage and transport
- Improper processing measures by processors
- Other reasons

A -- Unfamiliar with ISPM15 standards by the enterprises
B -- Fake information by export enterprises
C -- Other reasons
D -- Improper storage and transport
E -- Improper processing measures by processors
2.5.1 Enterprises are not familiar with the standard ISPM15

- Export enterprises use wood package untreated and without stamped marks
- Wood package with bark
- Use untreated and recycling wood package
- Incompletely stamped marks (only one side)
- Wood package components untreated or without marks
- Import enterprises didn’t apply for quarantine inspection for wood package
2.5.2 Export enterprises information

- Forged ISPM15 marks
- Forged enterprise Information
2.5.3 Improper storage and transport

- Storage conditions do not meet the standards for quarantine and epidemic prevention

- During transport, space conditions for load and transport do not meet the standard; ISPM15 marks are partially covered because of randomly truncating processed wood package, replacing or adding untreated wood packaging materials, etc.
2.5.4 Improper processing measures by processing enterprises

- Physical and chemical conditions do not meet the standards during the process

Methyl bromide (MB) fumigation

<table>
<thead>
<tr>
<th>Temperature</th>
<th>Dosage (g/m³)</th>
<th>Minimum concentration (g/m³) at:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>2 hrs.</td>
</tr>
<tr>
<td>≥21°C</td>
<td>48</td>
<td>36</td>
</tr>
<tr>
<td>≥16°C</td>
<td>56</td>
<td>42</td>
</tr>
<tr>
<td>≥11°C</td>
<td>64</td>
<td>48</td>
</tr>
</tbody>
</table>

Note: The minimum temperature should be 10°C and the minimum exposure time should be 24 hours. The concentration shall be measured at the 2nd, 4th and 24th hours.
2.5.5 Other Reasons

- Repeated Notifications
Relevant Measures

- Relevant measures have been taken to deal with the cases
Thank You!

Tel: 8610-84603702
Fax: 8610-84603817
Email: hanlelin@tbtspsp.com
Overview of Chinese entry non-compliant WPM

Chinese Academy of Inspection and Quarantine
June, 2014
Statistics of non-compliant WPM in 2009-2013

<table>
<thead>
<tr>
<th>Year</th>
<th>No IPPC Mark</th>
<th>Pests Intercepted</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>9399</td>
<td>566</td>
</tr>
<tr>
<td>2010</td>
<td>7293</td>
<td>618</td>
</tr>
<tr>
<td>2011</td>
<td>10034</td>
<td>550</td>
</tr>
<tr>
<td>2012</td>
<td>12639</td>
<td>719</td>
</tr>
<tr>
<td>2013</td>
<td>14385</td>
<td>1010</td>
</tr>
</tbody>
</table>
## Pest interception rate in 2013

<table>
<thead>
<tr>
<th></th>
<th>IPPC Mark</th>
<th>No IPPC Mark</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pests Intercepted</td>
<td>877</td>
<td>133</td>
</tr>
<tr>
<td>Total number of WPM</td>
<td>2501830</td>
<td>14385</td>
</tr>
<tr>
<td>Interception rate</td>
<td>0.035%</td>
<td>0.925%</td>
</tr>
</tbody>
</table>
Monthly statics in 2013

Graph showing monthly statics in 2013 with two lines:
- No IPPC Mark
- Pests Intercepted
Exporting countries (regions) of non-compliant WPM in 2013

No IPPC Mark

- United States: 3242
- Germany: 1876
- Korea: 789
- Italy: 657
- Japan: 633
- France: 507
- Taiwan: 447
- India: 390
- Hong Kong: 337
- Netherlands: 267
Exporting countries (regions) of non-compliant WPM in 2013

<table>
<thead>
<tr>
<th>Country</th>
<th>Pests Intercepted</th>
</tr>
</thead>
<tbody>
<tr>
<td>United States</td>
<td>124</td>
</tr>
<tr>
<td>India</td>
<td>91</td>
</tr>
<tr>
<td>Korea</td>
<td>82</td>
</tr>
<tr>
<td>Germany</td>
<td>79</td>
</tr>
<tr>
<td>Malaysia</td>
<td>77</td>
</tr>
<tr>
<td>Indonesia</td>
<td>55</td>
</tr>
<tr>
<td>Taiwan</td>
<td>48</td>
</tr>
<tr>
<td>Singapore</td>
<td>36</td>
</tr>
<tr>
<td>Russia</td>
<td>35</td>
</tr>
<tr>
<td>Belarus</td>
<td>32</td>
</tr>
</tbody>
</table>
Statistics of pests intercepted in 2013

- Insect: 815
- Nematodes: 354

Variety of pests:
- Insect: 121
- Nematodes: 3
### Statistics of pests intercepted in 2013

<table>
<thead>
<tr>
<th>Category</th>
<th>Scientific Name</th>
<th>Chinese Name</th>
<th>Number of interceptions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Quarantine pests</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nematodes</td>
<td><em>Bursaphelenchus xylophilus</em></td>
<td>松材线虫</td>
<td>159</td>
</tr>
<tr>
<td>Insect</td>
<td><em>Heterobostrichus aequalis</em></td>
<td>双钩异翅长蠹</td>
<td>90</td>
</tr>
<tr>
<td>Insect</td>
<td><em>Sinoxylon sp.</em></td>
<td>双棘长蠹属（非中国种）</td>
<td>19</td>
</tr>
<tr>
<td>Insect</td>
<td><em>Monochamus sp.</em></td>
<td>墨天牛属（非中国种）</td>
<td>13</td>
</tr>
<tr>
<td>Insect</td>
<td><em>Platypus parallelus</em></td>
<td>中对长小蠹</td>
<td>10</td>
</tr>
<tr>
<td><strong>Non-quarantine pests</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nematodes</td>
<td><em>Bursaphelenchus mucronatus</em></td>
<td>拟松材线虫</td>
<td>172</td>
</tr>
<tr>
<td>Insect</td>
<td><em>Sinoxylon anale</em></td>
<td>双棘长蠹</td>
<td>133</td>
</tr>
<tr>
<td>Insect</td>
<td><em>Cerambycinae</em></td>
<td>天牛亚科</td>
<td>91</td>
</tr>
<tr>
<td>Insect</td>
<td><em>Bostrychidae</em></td>
<td>长蠹科</td>
<td>61</td>
</tr>
<tr>
<td>Insect</td>
<td><em>Oedemeridae</em></td>
<td>拟天牛科</td>
<td>49</td>
</tr>
</tbody>
</table>
Automatic notification

- United States
- Canada
- Mexico
- European Union

- Wood
- WPM
- No IPPC Mark
- Pests

Daily

Automatic Notification
<table>
<thead>
<tr>
<th>序号 NO.</th>
<th>日期</th>
<th>通报内容</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>140527</td>
<td>美国木质包装(6条记录) [打印] [编辑]</td>
</tr>
<tr>
<td></td>
<td></td>
<td>欧盟木质包装(14条记录) [打印] [编辑]</td>
</tr>
<tr>
<td></td>
<td></td>
<td>欧盟木村(16条记录) [打印] [编辑]</td>
</tr>
<tr>
<td>2</td>
<td>140525</td>
<td>美国木质包装(24条记录) [打印] [编辑]</td>
</tr>
<tr>
<td></td>
<td></td>
<td>欧盟木质包装(55条记录) [打印] [编辑]</td>
</tr>
<tr>
<td></td>
<td></td>
<td>欧盟木村(7条记录) [打印] [编辑]</td>
</tr>
<tr>
<td></td>
<td></td>
<td>加拿大木质包装(3条记录) [打印] [编辑]</td>
</tr>
<tr>
<td>3</td>
<td>140522</td>
<td>美国木质包装(1条记录) [打印] [编辑]</td>
</tr>
<tr>
<td></td>
<td></td>
<td>欧盟木质包装(9条记录) [打印] [编辑]</td>
</tr>
<tr>
<td></td>
<td></td>
<td>欧盟木村(1条记录) [打印] [编辑]</td>
</tr>
<tr>
<td>4</td>
<td>140521</td>
<td>美国木质包装(9条记录) [打印] [编辑]</td>
</tr>
<tr>
<td></td>
<td></td>
<td>欧盟木质包装(6条记录) [打印] [编辑]</td>
</tr>
<tr>
<td></td>
<td></td>
<td>欧盟木村(1条记录) [打印] [编辑]</td>
</tr>
<tr>
<td>5</td>
<td>140520</td>
<td>美国木质包装(1条记录) [打印] [编辑]</td>
</tr>
<tr>
<td></td>
<td></td>
<td>欧盟木质包装(11条记录) [打印] [编辑]</td>
</tr>
<tr>
<td></td>
<td></td>
<td>加拿大木质包装(1条记录) [打印] [编辑]</td>
</tr>
<tr>
<td>6</td>
<td>140518</td>
<td>美国木质包装(17条记录) [打印] [编辑]</td>
</tr>
<tr>
<td></td>
<td></td>
<td>欧盟木质包装(70条记录) [打印] [编辑]</td>
</tr>
<tr>
<td></td>
<td></td>
<td>欧盟木村(2条记录) [打印] [编辑]</td>
</tr>
<tr>
<td>7</td>
<td>140515</td>
<td>美国木质包装(4条记录) [打印] [编辑]</td>
</tr>
<tr>
<td></td>
<td></td>
<td>欧盟木质包装(4条记录) [打印] [编辑]</td>
</tr>
</tbody>
</table>
Automatic notification for non-compliant WPM during the first quarter of 2014

<table>
<thead>
<tr>
<th></th>
<th>EU</th>
<th>US</th>
<th>Canada</th>
<th>Mexico</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pests Intercepted</td>
<td>18</td>
<td>14</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>No IPPC Mark</td>
<td>800</td>
<td>587</td>
<td>38</td>
<td>22</td>
</tr>
</tbody>
</table>
Thank you!
Non-Compliance Notification

Takashi Kawai
Yokohama Plant Protection Station
Ministry of Agriculture, Forestry and Fisheries (MAFF)
Japan
Exportation of WPM in Japan

Non-compliance notification of exported WPM

The number of notification from Importing Country

<table>
<thead>
<tr>
<th>Year</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Notification</td>
<td>25</td>
<td>29</td>
<td>13</td>
</tr>
</tbody>
</table>

The number of notification from Importing Country

- Year 2011: 25
- Year 2012: 29
- Year 2013: 13
Classification of non-compliance notification of exported WPM (2011-2013)

- Absence of Required Mark: 56 (84%)
- Quarantine Pest Detected: 5 (7%)
- Others: 6 (9%)

Exportation of WPM in Japan
Exportation of WPM in Japan

Response to non-compliance notification from Exporting country

Investigate the case

Take the necessary actions (e.g., instruct the exporter)
Non-compliance of imported WPM in Japan

WPM with required mark

Not subject to inspection

In case quarantine pest is detected based on various information (e.g. Information from importer)

Non-compliance
## Importation of WPM in Japan

### Number of Non-Compliance of imported WPM

<table>
<thead>
<tr>
<th>Year</th>
<th>2007</th>
<th>2008</th>
<th>2009</th>
<th>2010</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of non-compliance</td>
<td>13</td>
<td>5</td>
<td>7</td>
<td>4</td>
<td>13</td>
<td>8</td>
<td>4</td>
</tr>
</tbody>
</table>

![Graph showing the number of non-compliance notifications for imported WPM in Japan from 2007 to 2013.](image-url)
Importation of WPM in Japan

Example of non-compliance

Damaged hole

*Heterobostrychnus aequalis*
Importation of WPM in Japan

Example of non-compliance

Damaged hole

Sinoxyylon anale
Importation of WPM in Japan

Actions to improve the compliance with ISPM 15

- Strengthening the confirmation whether imported WPM is comply with ISPM 15
- Quick notification of non-compliance to exporting country
Importation of WPM in Japan

**Actions to improve the compliance with ISPM 15**

**Publicity activity**

Dissemination of system on imported WPM by Leaflets

Announcing information of exporting and imported WPM on Plant Protection Station HP

(http://www.maff.go.jp/pps/j/konpozai/index.html)
Non compliance notification in Korea

1. Outline
1.1 When start WPM inspection : 2005
1.2 How to inspect WPM : spot check or base on application of no marking WPM
1.3 Type of non compliance : no IPPC mark
1.4 Number of non compliance : ave.344/year(please refer to attachment1)
1.5 Action taken : destroy or treatment, notification to concerned party every 3 month(attachment2)

2. Specific requirements
2.1 Timeliness : notify non compliance by country 3 month base
2.2 Enhancing efficiency of notifying non compliance of importing WPM to exporting party : notify contents of non compliance more specifically including
   1) total number of case and number of case taken,
   2) reason of action(ex: no marking on 2 side, dunnage or timber inside etc, detection of pest, bark, excretion etc.)
   3) how to take action(treatment, destroy), date of action taken
   4) within 3month base after detection
   5) prepare revised notification form
2.3 Information required for trace back and trace forward
   registered mark, B/L
2.4 Pest involved :
2.5 Minimum information requirements for regulation and commerce
2.6 Type of wood packaging involved : pallet, wooden box, wheel, dunnage, timber etc.
2.7 Diagnostics(Pest ID) : NPPO
2.8 Reporting back : take action based on result→ input the result on WPM online information support system
2.9 Shipping information : invoice, B/L, manifest, exporter, certification number, additional mark, photos
2.10 Report on corrective action : receive notification→ notify non compliance to exporter and confirm fact →corrective action →notify corrective action to importing party if necessary
### Quarantine statistic of importing WPM in Korea

<table>
<thead>
<tr>
<th>Year</th>
<th>Total case of imported plant/plant material</th>
<th>Total inspection case</th>
<th>No WPM case</th>
<th>WPM compliance</th>
<th>Non compliance (%)</th>
<th>Sub total</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006</td>
<td>3,625,613</td>
<td>103,991</td>
<td>76,103</td>
<td>27,473</td>
<td>415(1.5)</td>
<td>27,888</td>
</tr>
<tr>
<td>2007</td>
<td>4,249,038</td>
<td>78,276</td>
<td>57,506</td>
<td>20,307</td>
<td>463(2.2)</td>
<td>20,770</td>
</tr>
<tr>
<td>2008</td>
<td>3,523,548</td>
<td>88,829</td>
<td>59,498</td>
<td>28,826</td>
<td>422(1.4)</td>
<td>29,248</td>
</tr>
<tr>
<td>2009</td>
<td>3,868,397</td>
<td>152,787</td>
<td>88,519</td>
<td>63,839</td>
<td>419(0.7)</td>
<td>64,268</td>
</tr>
<tr>
<td>2010</td>
<td>3,797,269</td>
<td>100,885</td>
<td>60,504</td>
<td>40,138</td>
<td>243(0.6)</td>
<td>40,381</td>
</tr>
<tr>
<td>2011</td>
<td>4,075,970</td>
<td>109,482</td>
<td>54,214</td>
<td>55,101</td>
<td>167(0.3)</td>
<td>55,268</td>
</tr>
<tr>
<td>2012</td>
<td>4,136,918</td>
<td>76,233</td>
<td>42,911</td>
<td>32,951</td>
<td>371(1.1)</td>
<td>33,322</td>
</tr>
<tr>
<td>2013</td>
<td>3,507,614</td>
<td>70,779</td>
<td>44,950</td>
<td>25,576</td>
<td>253(1.0)</td>
<td>25,829</td>
</tr>
</tbody>
</table>
Animal, Plant and Fisheries Quarantine and Inspection Agency
Ministry for Food, Agriculture, Forestry and Fisheries
433-1, Anyang 6-dong, Manan-Gu, Anyang-city, Kyunggi-do, (430-016) Korea
Tel : 82-31-420-7671 Fax : 82-31-420-7605

Notification of Non-compliance

To : Direction General de Protection des Cultures Quinze de Marquises 2780
115 Oeiras

Date : 4 April 2013

In accordance with the International Plant Protection Convention, we inform you that the following consignment was found not to be complied with the import quarantine requirements of Korea.

Description of Consignment

Exporter : FRIGOCON, S.A.
Consignee : SKADIA CO LTD
Place of origin : Portugal
Port of Entry : ICN
Means of conveyance : Air Cargo
Quantity and name of commodity : FREEZER CASE 4 pc(s) (Wooden Box 4pc)
Phytosanitary certificate number, and date and place of issuance
Date of import inspection : 15 February 2013

Contents of non-compliance

☐ Found to be prohibited articles into Korea
☐ Failed to bear Additional Declaration required on its Phytosanitary Certificate
☐ Contaminated with following quarantine pest(s) or prohibited articles
☐ Other non-compliances

NO IPPC MARK

Disposition of Consignment

The ☑ entire or ☐ partial lot of the consignment was
☐ Treated ☑ Destroyed ☐ Returned to Origin ☐ Re-exported ☐ Release

[Remarks] : B/L : 00128715

Lee, Jae Hwon
Director
Export Management Division
Department of Plant Quarantine
Animal, Plant and Fisheries Quarantine and Inspection Agency
Ministry for Food, Agriculture, Forestry and Fisheries, Republic of Korea
Management of Non-Compliance in ISPM15

Yusof Othman
Plant Biosecurity Division, Malaysia
Introduction

Non compliance of WPMs among the important issues are:

- Does not carry the required IPPC marking
- Carried the required mark but intercepted with live pests
- Re-use or re-export and the making is from the original country
- ISPM 15 stated that for non compliance - treatment, disposal or refused entry action could be taken. The NPPO of the exporting country may also be notified
Among WPM products that have been intercepted associated with non-compliance:

- Pallets,
- Crate,
- Packing Blocks,
- Drums,
- Cases,
- Pallet Collars, And
- Skids
Management of WPM compliance (Export)

- Company receiving the notification on the non-compliance will be investigated
- Company proof to be the cause of the non-compliance will be suspended until corrective action taken and to the satisfaction of the auditors, the technical committee and main accreditation committee
- Corrective actions by the company have to be taken within 2 weeks of notification received
- Non ratification conducted after 3 consecutive warning of unsatisfactory corrective actions will lead to the delisting of the company from the approved WPM treatment service provider
Management of WPM non compliance (import)

- Record on the non-compliance will be sent to centralise unit (SPS management unit of the plant Biosecurity Division)
- Collection of information on the non-compliance to fulfilled the ISPM 13 notification requirements
- Notification of the non-compliance will be send to NPPO of the exporting country through SPS unit of Plant Biosecurity Division
- Inspection on the WPM from the non-compliance country will be intensified to ensure compliance
- All new interception of WPM with live insects will be destroyed or treated based on identity of the insect found
- Further interception from non-compliance country will lead to refuse entry by the inspector at the entry point until NPPO of the exporting country conduct corrective action to prevent infestation of live insect
Information requirement for traceability in Malaysia

- Treatment provider registration number
- Treatment type (MB or HT)
- Exporter name and address
- Last port departure/exporting country
- Batch/running number
Diagnostic Procedure in Malaysia

Sample (Entry points/Phytosanitary Inspection)

Post Entry Quarantine Laboratory

Result sent back to Entry Points/Phytosanitary Inspection

Specialised Pest and disease Central Laboratory

SPS Unit for Notification

Result sent back to Entry Points/Phytosanitary Inspection

SPS Unit for Notification
Thank You
<table>
<thead>
<tr>
<th></th>
<th>2012</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Export</td>
<td>690.65 MT</td>
<td>4,181.53 MT</td>
</tr>
<tr>
<td>Import</td>
<td>7,426.53 MT</td>
<td>4,412.50 MT</td>
</tr>
</tbody>
</table>
Non-Compliance Notifications

• For exported WPM, <5 notifications of WPM non-compliance received per year since 2005
  - USA, EU, Australia
  - investigations being conducted
  - documentations submitted to the BPI-PQS Central Office
  - QTP when found at fault, will be warned, suspended or blacklisted
  - other parties involved will be warned
Documentation

• Phytosanitary Certificate covered by the notification
• Treatment Certificate/details
• Inspection report by the PQ Officer
• Other documentation (packing list, export declaration, bill of lading, etc)
• If pest is found, proper identification of pest with pictures
• Corrective Actions
• Reporting back
REPORT BY SINGAPORE

Agri-Food & Veterinary Authority

AVA
Non Compliances Notification

Interceptions

Y2011 Y2012 Y2013

2011

USA | 1
Italy | 1
Canada | 2
Brazil | 5
Australia | 4

2012

USA | 1
Malaysia | 1
Greece | 2
Germany | 2
Australia | 4

2013

Malaysia | 1
Brazil | 16
Germany | 1

APPPC/NPPO JOINT WORKSHOP ON ISPM NO. 15: REGULATION OF WOOD PACKAGING MATERIAL IN INTERNATIONAL TRADE 10 – 14 JUNE 2014 BEIJING, CHINA
Non Compliances Notification

Profile: Types of Non compliances associated with SWPMs from 2011-13

- Live pests: 16
- Undeclared timber: 5
- Soil detected: 2
- No ISPM 15 marking: 2
Non Compliances Notification

Observations

1. Some exporting companies are foreign companies

2. Inadequate information (i) only names and address of companies and the number of interceptions related to the companies stated, (ii) ISPM identifier (SG-02-HT-DB)

3. Notifications received at six months interval
Non Compliance Notification

Suggestions

1. Timely notification for effective corrective actions

2. Establish bilaterally (maybe) a timeframe for notification, corrective actions and report on corrective actions to reduce repeat non compliances by the same companies

3. Communication, besides thru IPPC contact point, with operational personnel as well
Non Compliance Notification

Suggestions

4. Adequate information provided for investigation:
   - Name and address of exporter
   - Mode and means of transport
   - Documents (bill of lading, phytosanitary/treatment certificate number if applicable, invoice)
   - Description of the SWPMs
   - Distinguishing marks on SWPMs
   - Quantity not in compliance
THANK YOU
Thailand Presentation
On
Country Experiences in Implementing of ISPM No.15

Mr. Chusak Wongwichakorn
Senior Agricultural Research Specialist
Department of Agriculture
THAILAND
- Thailand has implemented ISPM No.15 for export since 2004
- Export Plant Quarantine Service
  Office of Agricultural Regulation
  Department of Agriculture
- Plant Quarantine Station
Procedure for Registration of WPMs Producers and Treatment Providers

- Meeting with the exporters, WPMs producers, Treatment Providers to facilitate understanding of ISPM No.15
- Auditor’s Training
  - ISPM No.15
  - Australian fumigation accreditation scheme (AFAS)
  - Heat Treatment
Documentation for registration

• Application Form
• Audit Check lists for MB and HT
• Registration form for approved accredited WPMs producers
Auditing for registration

- Application – company name, address, license, competent personal, location
- Auditing – location, equipment, facilities, storage area, safety, demonstration of treatment
- Understanding of ISPM No.15
MB auditing

- License fumigator
- Equipment
- Fumigation meet the standard
- Safety
HT auditing

- Competent personal
- Heat chamber
- Equipment
- Treatment meet standard
Approval

• Auditor submit all the documents to the technical committees
• Technical committees consideration for approval
Issuance of Registration Form

- Approval WPMs producers or Treatment provider will get DOA Registration form
- Registration valid for 1 year
- Authorize signed by DOA
Thailand Registration Form for ISPM No.15
Monitoring

- Validity of Registration
- Record keeping
- Unannounced Audit
- Non-compliance notification
- Treatment demonstration
Non-Compliance

- Warning
- Suspension and corrective action require (CAR)
- Withdraw
Problem and Constraints

- Thailand haven’t implemented ISPM No.15 for importation
- Lack of auditors to conduct unannounced audit
- Fraudulent records
- No record keeping
- Treatment were not in standard
- Invalid registration number
List of Approved Accredited WPMs producers and Treatment Providers

- MB Fumigation – 470 companies
- Heat Treatment – 345 companies
- The list of registered approved WPMs producers and Treatment Providers are published in www.doa.go.th
Management of Non – Compliance in ISPM 15 for export

Mr. Chusak Wongwichakorn
Senior Agricultural Research Specialist
Department of Agriculture
THAILAND
Non-compliance of WPMs for export are:

- No marking of exported WPMs
- Live insect found on WPMs at port of entry
- Live insect found after a period of time
Type of WPMs that have been notified

- Pallets
- Cases
Management of WPMs non-compliance (Export)

- Investigation conducted by auditor
- Company proof to be caused of non-compliance will be suspended or withdrawn the registration number
- Corrective action must be done until satisfactory
THANK YOU
Trace Back
ISPM 15 requires the importing NPPO to inform the exporting NPPO when a non-compliant item of WPM is found.

Purpose of notification is so the exporting NPPO can investigate the non-compliance and if needed take the necessary steps to correct and prevent recurrence.
ISPM Guidance for Noncompliance and Emergency Action

• As referenced in section 4.6 of ISPM 15, non-compliance and emergency action is provided in ISPM 13:2001 and ISPM 20:2004 sections 5.1.6.1 to 5.1.6.3

• The information provided in these standards, while informative and useful for dealing with non-compliance and emergency action in the broad sense, may not provide sufficient guidance for proper trace back and correction of non-compliant WPM
ISPM 15 Provides for the Production of Compliant WPM in the Following Ways:

• A manufacturer can manufacture WPM from non-treated wood, treat the manufactured WPM according to ISPM 15 requirements and label the manufactured WPM as ISPM 15 compliant

or

• A manufacturer may obtain wood that has been previously treated and has been identified and monitored under a NPPO approved procedure, manufacture the WPM from this wood and then label the manufactured WPM as ISPM 15 compliant without further treatment. A facility using this method could have numerous suppliers of treated wood and any markings on such wood are key to trace back if a problem exist with the wood used in the manufacture of ISPM 15 compliant WPM
• Trace back for WPM is difficult where the treatment of the wood is not provided for by the manufacturer of the WPM

• Further complications involve manufacturers that have treatment capabilities but also purchase treated wood from outside sources to supplement production of WPM

• In many cases the WPM may contain wood from numerous treatment providers

• Given the variable production processes of a WPM manufacturer, simply reporting the information contained within the ISPM 15 mark may not be sufficient to facilitate proper trace back thus the problem may not be corrected
Section 5 of ISPM 13:2001 **requires that notifications are timely.** This is particularly applicable for WPM given the varying production conditions applicable to WPM:

- Ideally issuing a report immediately upon finding a quarantine pest is the best.

- The longer the delay the less chance the exporting country has of correcting the problem---and correcting a problem is extremely important in the success of ISPM 15.
What Information Would be Extremely Helpful to the Exporting NPPO?

• Detailed shipping records including:
  ✔ Shipper of the product that was transported on the suspect WPM
  ✔ Date shipped
  ✔ Date received
  ✔ Volume and type of WPM involved

• Digital pictures of the suspect WPM showing all markings that appear on the suspect WPM

• The actual size(s) of the infected piece(s) as well as a listing of all markings observed on those piece(s)

• Surface condition of the infested component(s) i.e. surfaced, rough or some combination of surfaced or rough

• Moisture content of the infested piece(s) if possible
Examples of Digital Pictures of Additional Markings
Following Pictures Show Repaired/Remanufactured WPM Where Multiple Marks Are Present on the WPM
Questions?

• If you would like a copy of this presentation, please send me an email:
  
  • jmcdaniel@alsc.org

Thank you!!
Wood Packaging Compliance
NNC Timeline

- Field Inspection – CBP Ag Specialist
- Identifier Verification for Action
- NNC Notification
- Final Identification
## Top 5 Pest Found

(The complete list is available)

<table>
<thead>
<tr>
<th>Count of Pest Name</th>
<th>Column Labels</th>
<th>Non-Compliant - No Markings</th>
<th>Grand Total</th>
</tr>
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<tbody>
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<td>Non-Compliant - Timber Pest</td>
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<td>82</td>
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Identification Process

- Field Officer Training
- Plant Inspection Station
- Specialist
  - Normal Procedure
  - Urgent Shipments
Commodities with Highest Incidence of WPM Pests

Highest Risk Commodities

- Manifested WPM
- Machinery (including Auto Parts)
- Metal Products
- Stone Products (including tile)
Commodities with Highest Incidence of WPM Pests

Additional High Risk Commodities
1. Electronics/Electronic Components
2. Finished Wood Articles
3. Plant Products and Foodstuffs
Processing Received NNC

- NNC List evaluation
- Submission for field investigation
- Final Report
If you would like a copy of this presentation, please send me an email:

john.t.jones@aphis.usda.gov

Thank you for your attention!
<table>
<thead>
<tr>
<th>Type of pest found</th>
<th>Count of Pest Name</th>
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<td><strong>Grand Total</strong></td>
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COUNTRY REPORT ON
NON-COMPLIANCE SITUATION OF ISPM 15 IN VIETNAM
(UPDATED, MAY 2014)

DUONG MINH TU

Beijing, June 10-14, 2014
## NON-COMPLIANCE NOTIFICATION OF IMPORTING COUNTRY FOR ISPM No. 15

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<th>Reason of commodity</th>
<th>Measure taken</th>
<th>Type of Doc.</th>
<th>Doc. No.</th>
<th>Place of issue</th>
<th>Date of issue</th>
<th>Consignment</th>
<th>Intercepted</th>
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<td>WOOD PACKING MATERIAL</td>
<td>WOOD PACKING MATERIAL</td>
<td>SPECIAL REQUIREMENT ENTRY REFUSAL</td>
<td>N/A</td>
<td>N/A</td>
<td>2-Aug</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WOOD PACKING MATERIAL</td>
<td>WOOD PACKING MATERIAL</td>
<td>No Marking re-exported</td>
<td>n/a</td>
<td>n/a</td>
<td>2-Aug</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WOOD PACKING MATERIAL</td>
<td>WOOD PACKING MATERIAL</td>
<td>No Marking re-exported</td>
<td>n/a</td>
<td>n/a</td>
<td>2-Aug</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>WOOD PACKING MATERIAL</td>
<td>WOOD PACKING MATERIAL</td>
<td>No Marking re-exported</td>
<td>n/a</td>
<td>n/a</td>
<td>2-Aug</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TERRACOTTA PRODUCTS</td>
<td>WOOD</td>
<td>No Marking</td>
<td>re-exported</td>
<td>n/a</td>
<td>n/a</td>
<td>2-Aug</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>
## Non-Compliance Notification of Importing Country for ISPM No. 15 (Continued)

<table>
<thead>
<tr>
<th>Type</th>
<th>Description</th>
<th>Marking</th>
<th>Re-exported</th>
<th>Lab Testing</th>
<th>Technical Requirement</th>
<th>Destruction</th>
<th>Code</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pallet</td>
<td>Wood Packing Material</td>
<td>No Marking</td>
<td>Re-exported</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td>22-Aug</td>
</tr>
<tr>
<td>Pallet</td>
<td>Wood Packing Material</td>
<td>NO MARKING</td>
<td>Re-exported</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td>22-Aug</td>
</tr>
<tr>
<td>Machinery and Parts</td>
<td>Wood Packing Material</td>
<td>NO MARKING</td>
<td>Re-exported</td>
<td>NA</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td>22-Aug</td>
</tr>
<tr>
<td>Packing Material</td>
<td>Wood Packing Material</td>
<td>NO MARKING</td>
<td>DESTRUCTION</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td>15-Aug</td>
</tr>
<tr>
<td>Wooden Crate</td>
<td>Wood</td>
<td>SPECIAL REQUIREMENT</td>
<td>LAB TESTING</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>05/2011/MK</td>
<td>31-Aug</td>
</tr>
<tr>
<td>Wooden Cases</td>
<td>Wood</td>
<td>No Marking</td>
<td>MB</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td>KD3</td>
</tr>
<tr>
<td>Wooden Crates</td>
<td>Wood</td>
<td>No Marking</td>
<td>MB</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td>KD2</td>
</tr>
<tr>
<td>Wooden Pallet</td>
<td>Pallet</td>
<td>No Marking</td>
<td>MB</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td>KD2</td>
</tr>
<tr>
<td>Wood</td>
<td>Wood Pallet</td>
<td>TECHNICAL REQUIREMENTS</td>
<td>DESTRUCTION</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wood (Bin, Box, Case, Chest, Trunk)</td>
<td>Wood</td>
<td>TECHNICAL REQUIREMENTS</td>
<td>DESTRUCTION</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wood</td>
<td>Wood (Cage, Framed Crate, Skeleton Case)</td>
<td>TECHNICAL REQUIREMENTS</td>
<td>DESTRUCTION</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Main reasons of non-compliance and measures taken

<table>
<thead>
<tr>
<th>No.</th>
<th>Main reasons</th>
<th>Measures taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Non-compliance with technical arrangement</td>
<td>Destruction the intercepted part</td>
</tr>
<tr>
<td>2.</td>
<td>ISPM15 mark missing</td>
<td>Destruction the intercepted part</td>
</tr>
<tr>
<td>3.</td>
<td>Noncompliance with special requirements</td>
<td>Destruction the intercepted part</td>
</tr>
<tr>
<td>4.</td>
<td>Bark on WPM over ISPM 15</td>
<td>Destruction</td>
</tr>
<tr>
<td>5.</td>
<td>No Marking</td>
<td>Re-exported/or MB treatment/or destruction</td>
</tr>
</tbody>
</table>
THANK YOU VERY MUCH FOR YOUR KIND ATTENTION
Need for a standard

- Wood boring pest interceptions
- Surveillance and monitoring programmes linked interceptions to wood packaging material
- Experts met several times and developed a draft ISPM
- Draft ISPM presented to ICPM-4 (2002)
Last minute Negotiations at ICPM-4 (2002)

- Debarking removed - technically justified?
- Concerns on the efficacy of methyl bromide in relation to pinewood nematodes
- Concern about promoting methyl bromide but reference to Montreal Protocol was not removed
ISPM 15 mark

The mark should at minimum include the:
- symbol
- ISO two letter country code followed by a unique number assigned by the NPPO to the producer of the wood packaging material, who is responsible for ensuring appropriate wood is used and properly marked
- IPPC abbreviation according to Annex I for the approved measure used (e.g. HT, MB).
Addressing concerns on the symbol

- A company in the USA claimed the symbol was already in use so IPPC Secretariat suggested countries temporarily suspend the implementation of the ISPM 15: 2002
Addressing concerns on efficacy

- North American Forestry Commission
- International Forest Quarantine Research Group (IFQRG)
- ICPM-5 (2003) requested the IFQRG to review data provided by the Republic of Korea and China
- IFQRG coordinated research on methyl bromide
New ISPM 15 symbol

- New symbol design, FAO registered under the Madrid Agreement (MA) and in some countries not party to the MA
- Limited resources: symbol was only registered in 82 countries in 2004.
ICPM-6 (2004) established Technical Panels:

• Technical Panel on Forest Quarantine (TPFQ)
  ➢ Work on the development of ISPM 15
  ➢ Practical application of treatments

• Technical Panels on Phytosanitary Treatments (TPPT)
  ➢ review treatment efficacy using ISPM 28
    (Phytosanitary treatments for regulated pests)
IPPC workshop on the practical application of ISPM 15

28 February-4 March 2005, Vancouver, Canada

- Over 170 delegates participated:
  - reviewed ISPM 15 requirements
  - toured approved facilities
  - each delegate developed an implementation plan.
IPPC workshop on the practical application of ISPM 15

- Workshop proceeding are available on the IPP: https://www.ippc.int/core-activities/capacity-development/ippc-workshop-practical-application-ispm-no-15vancouver-canada-28-february-4-march-2005
ISPM 15 implementation issues

- Issues were raised on implementation
- IFQRG set up a list serve for Q & As
- Some issues raised, indicated that ISPM 15 should be revised
- CPM-1 (2006) added the revision of ISPM 15 to the IPPC List of topics for standards
- TPFQ began the revision
Revised Annex 1 on treatments

• CPM-1 (2006) adopted a revised Annex 1: Approved measures associated with wood packaging material to address the concerns regarding the methyl bromide (MB) fumigation
  • provided more guidance
  • fumigation schedule was changed
CPM Recommendation

• Use of methyl bromide for quarantine purposes is allowed under the Montreal Protocol
• IPPC criticized by the world for promoting methyl bromide use but in reality there was always an alternative treatment
• CPM-3 (2008) adopted a CPM recommendation on: *Replacement or reduction of the use of methyl bromide as a phytosanitary measure*
Revised ISPM 15

• CPM-4 (2009) adopted a revised ISPM 15: *Regulation of wood packaging material in international trade*
Issues addressed in the 2009 adopted ISPM 15

- reuse and remanufacture
- bark risks, specifically defining what size of bark was most risky
- removal of bark was added
- more guidance on the application of treatments
- criteria for new treatments removed (under revision)
- increased guidance on the use of the mark
ISPM 15 mark

Required components of the mark:
- the symbol
- a country code
- a producer/treatment provider code
- a treatment code using the appropriate abbreviation according to Annex 1 (HT or MB).
More specific guidance on the use of the ISPM 15 mark

- legible to inspectors without the use of a visual aid
- durable and not transferable
- rectangular or square
- no other information within a border line
- not hand written
- some flexibility allowed
Examples of the ISPM 15 mark

- XX - 000
  YY

- XX - 000 - YY

- XX - 000
  YY
Protection of the symbol

- FAO has now registered the symbol in 114 countries
- In 2014 FAO has requested the registration in 19 more countries
- Each year, with limited resources, FAO continues the registration process
- IPPC welcomes commitments to reimburse FAO for registration costs
Usage Rules

• FAO as owner of the symbol has established usage rules
• FAO has authorized NPPO to use of the symbol in the ISPM 15 mark when implementing ISPM 15
Compliance

• FAO has delegated the NPPO as the authority to authorize and monitor the national use of the symbol in the ISPM 15 mark
• If misuse is discovered, NPPOs may request FAO to send a “Cease And Desist” letter to the offending party
Prosecution

- If the “Cease And Desist” letter does not bring about compliance NPPOs may request advice from FAO legal services.
- The NPPO (or Contracting Party) may request authority to prosecute on behalf of FAO, this needs to be done in consultation with FAO Legal Services and at the costs are covered by the NPPO.
An additional treatment added

CPM-8 (2013) adopted an additional treatment which was included in Annex 1. Approved treatments associated with wood packaging material:

- a heat treatment using dielectric heating (DH)
- CPM-8 requested guidance on the application of this treatment be developed
Explanatory document

- First ISPM 15 explanatory document was produced by Shane Sela
- In 2014, in consultation with the TPFQ, a revised explanatory document was produced by Shane Sela, lead author, Thomas Schroeder, Matsui Mamoru and Michael Ormsby
- Explanatory documents are published on the IPP: https://www.ippc.int/publications/regulation-wood-packaging-material-international-trade-0
Guidance Documents

• IPPC Secretariat has developed specific guidance on the use of dielectric heating, information can be found on the IPP [http://www.phytosanitary.info/](http://www.phytosanitary.info/)
Dielectric Heating- a quick guide to Dielectric Heating as treatment for wood packaging material
Possible new treatments

• In 2006 and 2007 the IPPC Secretariat made a call for treatments wood packaging treatments

• Six treatments for wood packaging were submitted:

<table>
<thead>
<tr>
<th>Ecotwin</th>
<th>Sulfuryl fluoride</th>
</tr>
</thead>
<tbody>
<tr>
<td>Microwave</td>
<td>Methyl iodide</td>
</tr>
<tr>
<td>Phosphine</td>
<td>Hydrogen cyanide (HCN)</td>
</tr>
</tbody>
</table>
TPPT reviewed treatment submissions

For most submissions there was:

• insufficient information on the numbers of pests tested
• efficacy level of the treatment against the target pest could not be determined
• the most resistant life stage was not determined
• life stages most likely to be present at the time of treatment was not determined
• no statistical support
TPPT requested additional information

Submitters, in most cases were not able to provide the TPPT with sufficient information.

Only two proposed treatments were considered further:
• Microwave heat treatment
• Sulfuryl fluoride
Microwave heat treatment

- Microwave changed to dielectric heating
- Adopted by CPM-8 (2013)
- Treatment code = DH
Sulfuryl fluoride

• Additional information is still being considered by the TPPT
Equivalence

First international recognition of equivalence for treatments:
- Fumigation by methyl bromide (MB)
- Treatment by heat (HT) or
- Dielectric heating (DH)

Also recognized the ISPM 15 mark as a way to prove a phytosanitary measure had been applied
New treatment criteria

• Criteria for ISPM 15 treatments was vague
• CPM decided to revise the criteria
• Part of ISPM 15 revision: *Criteria for treatments for wood packaging material in international trade* (2006-010)
• TPFQ are currently developing, pending IFQRG publication on the “Cardiff Protocol”
New treatment criteria (Cont.)

• TPFQ are revising based on research coordinated by IFQRG
• Once adopted this new criteria will be used by the TPPT and TPFQ to evaluate ISPM 15 treatment submissions
Conclusions

• The first and possibly the last case where the Appropriate Level of Protection is globally harmonized
• Huge impact on protecting trees and forests
• Equivalence
• Raised the profile of the IPPC
• Well worth the effort
• Need to focus on proper implementation
Contact details

Brent Larson
Standards Officer, IPPC Secretariat, Food and Agriculture Organization of the United Nations, Viale delle Terme di Caracalla, 00153 Rome, Italy
Phone + (39) 06-5705-4915
Brent.Larson@fao.org
Website: www.ippc.int
ISPM 15
Scientific Technical Issues

Dr. Eric Allen
Canadian Forest Service
Natural Resources Canada

June, 2014
NAPPO – APPPC
ISPM 15 Workshop
Beijing, China
Overview of ISPM science issues

- Economic damage caused by pests
- Pest interceptions on treated wood packaging
- Scientific basis of treatments
Overview of ISPM science issues

- Economic damage caused by pests
- Pest interceptions on treated wood packaging
- Scientific basis of treatments

How can science help make improvements to ISPM 15?
International Forestry Quarantine Research Group

• Advisory body to the IPPC providing scientific analysis and review of global phytosanitary issues and new information

• Identify and undertake collaborative scientific research aimed at high priority forestry quarantine questions
Pest Risks Reduced by ISPM 15

Before ISPM 15:

Untreated wood with bark

Cable spools: 25% with live insects
Quarantine rearing of spruce bolts used to brace granite blocks

Fungi, nematodes, and insects (2408 of 28 species)
Bark beetles and wood borers commonly intercepted and are known to be serious quarantine pests

21 species of Scolytinae and Cerambycidae established in the US from 1909–2008

- IFQRG bark infestation study results (UK, US, Germany, Canada)

Bark less than 3 cm wide or 50 square cm are very low risk
  - too small for insects to complete life cycle
  - dries quickly to become undesirable for insects

This led to changes in 2009 revision to ISPM 15
Bark patch size on area required for survival

*Ips typographus*

*Polygraphus poligraphus*

*Pityogenes chalcographus*

Gallery diagrams from Chararas (1962)
Canadian evaluation of SWP in containers

Live insects were found in 2% of the containers

<table>
<thead>
<tr>
<th>Treatment</th>
<th>% with insects</th>
</tr>
</thead>
<tbody>
<tr>
<td>MBr</td>
<td>30</td>
</tr>
<tr>
<td>HT</td>
<td>46</td>
</tr>
<tr>
<td>No IPPC stamp</td>
<td>23</td>
</tr>
<tr>
<td>Unknown</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>100</strong></td>
</tr>
</tbody>
</table>

Diagram showing the distribution of insect species, with the following categories and percentages:
- Brentidae: 1 (1%)
- Cerambycidae: 26 (35%)
- Tenebrionidae: 2 (3%)
- Curculionidae: 16 (21%)
- Bostrichidae: 29 (39%)
- Cleridae**: 1 (1%)

*Note: The diagram includes a section marked as **Bostrichidae**, but the percentage is not specified.
Analysis of interceptions based on wood packaging type

- Pallet
- Crate
- Dunnage

Scolytinae interceptions (n=1105) 1950-2000 - NZ MAF
Analysis of interceptions based on wood packaging type

2011
N=192

2012
N=231

2013
N=261

EUROPHYTE data
29 EU member states
Economic damage caused by pests

Several recent studies:

**Aukema et al. 2011. Economic Impacts of Non-Native Forest Insects in the Continental United States**

<table>
<thead>
<tr>
<th>Annual Wood Borer Damage ($US x 10^6)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal Government</td>
</tr>
<tr>
<td>Local government</td>
</tr>
<tr>
<td>Household</td>
</tr>
<tr>
<td>Property loss</td>
</tr>
<tr>
<td><strong>Forest timber loss</strong></td>
</tr>
<tr>
<td><strong>Total</strong></td>
</tr>
</tbody>
</table>
McKenny et al. 2013. Estimates of the potential cost of emerald ash borer (*Agrilus planipennis*) to Canadian municipalities

The researchers estimated costs associated with mortality of street and homeowner trees over 30 years and concluded:

“damage was estimated from $265 - $1,177 million depending on the combination of spread, treatment, and discount rates”
Leung et al. 2014. Pathway-level risk analysis: the net present value of an invasive species policy in the US.

The researchers integrated estimated damage costs with policy implementation costs (treatment, trade effects) and concluded:

“Implementation of ISPM 15, although costly and yielding only moderate protection, can generate >US$ 11 billion in cumulative net benefits by 2050”
Brockerhoff et al. (2014) modelled pest arrival rates and probability of establishment. Species with low arrival rates are more likely to be mitigated than those with more frequent arrival.
Establishments will still occur, especially with high-arrival rate pests, even when entry rates are lowered 50-75%.
Haack et al. 2014. Effectiveness of the international phytosanitary standard ISPM No. 15 on reducing wood borer infestation rates in wood packaging material entering the United States.

Comparing pre- and post-ISPM 15 interception rates:

<table>
<thead>
<tr>
<th>Country</th>
<th>Pre-ISPM 15</th>
<th>Post-ISPM 15</th>
<th>% reduction</th>
</tr>
</thead>
<tbody>
<tr>
<td>US</td>
<td>0.17-0.25%</td>
<td>0.11-0.12%</td>
<td>36-52</td>
</tr>
<tr>
<td>Chile</td>
<td>0.181</td>
<td>0.096</td>
<td>47</td>
</tr>
</tbody>
</table>
Haack et al. 2014. Effectiveness of the international phytosanitary standard ISPM No. 15 on reducing wood borer infestation rates in wood packaging material entering the United States.

Comparing pre- and post-ISPM 15 interception rates:

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<td>47</td>
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</table>

0.1% x 13 million containers = 13,000 with live pests
Haack et al. 2014. Effectiveness of the international phytosanitary standard ISPM No. 15 on reducing wood borer infestation rates in wood packaging material entering the United States.

Comparing pre- and post-ISPM 15 interception rates:

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<thead>
<tr>
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<th>Post-ISPM 15</th>
<th>% reduction</th>
</tr>
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<tr>
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<td>0.181</td>
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<td>47</td>
</tr>
</tbody>
</table>

0.1% x 13 million containers = 13,000 with live pests

Why are live pests still moving with ISPM 15-marked wood packaging?
Why are live pests still moving with ISPM 15-marked wood packaging?

Possible reasons:

- Pest tolerance of treatment
Why are live pests still moving with ISPM 15-marked wood packaging?

Possible reasons:

• Pest tolerance of treatment
• Infestation following treatment
Why are live pests still moving with ISPM 15-marked wood packaging?

Possible reasons:

• Pest tolerance of treatment
• Infestation following treatment
• Treatment not applied properly
Why are live pests still moving with ISPM 15-marked wood packaging?

Possible reasons:

• Pest tolerance of treatment
• Infestation following treatment
• Treatment not applied properly
• Fraud

Careful analysis of interceptions can help focus efforts to improve the effectiveness of ISPM 15
Scientific Basis of Treatments

Fumigation – methyl bromide

Exposure to methyl bromide is lethal to life stages of most living organisms

- 60 years of data showing MB use for wood products
- Effective for insects, fungi, nematodes
- Treatment success dependent on proper application
  - temperature, wood thickness, maintaining fumigant concentration
- Alternative fumigants being assessed
Scientific Basis of Treatments

HT

Exposure to high temperatures (50-60° C) is lethal to most living organisms

56° C for 30 min

• 80 years of data showing HT efficacy
• 1991 study - pinewood nematode and most adult and larval stages of insects
• recent research - wide range of decay and stain fungi
• outside of wood receives higher temperature, longer time
Heat treatment studies on fungi

![Graph showing survival of Leptographium wingfieldii at different temperatures and times.](image-url)
Maximum survival temperature for fungi (30 min exposure)

<table>
<thead>
<tr>
<th>Fungus</th>
<th>Temperature</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leptographium wingfieldii</td>
<td>51°</td>
</tr>
<tr>
<td>Leptographium wageneri</td>
<td>46°</td>
</tr>
<tr>
<td>Ophiostoma polonica</td>
<td>46°</td>
</tr>
<tr>
<td>Ceratocystis fagacearum</td>
<td>46°</td>
</tr>
<tr>
<td>Armillaria ostoyae</td>
<td>51°</td>
</tr>
<tr>
<td>Heterobasidion annosum</td>
<td>46°</td>
</tr>
<tr>
<td>Phellinus noxius</td>
<td>51°</td>
</tr>
<tr>
<td>Gloeophyllum sepiarium</td>
<td>66°</td>
</tr>
<tr>
<td>Thermotolerant, non-quarantine pest</td>
<td></td>
</tr>
</tbody>
</table>
Temperature profile of *Pinus* sawn wood at the end of a 509 minute schedule. Generally this temperature maintained for a further 30+ hr.
• Quarantine pests moving with wood packaging are known to cause significant social, ecological and economic impacts.

• Implementation of ISPM 15 is shown to have net economic benefit over time

• Fumigation and HT treatments are effective for most pests when applied correctly

• Compliance with ISPM 15 will lower pest arrivals and subsequent establishments but some will still occur.
What next?

The ultimate goal of ISPM 15, reducing pest establishments, can be improved by:

• Ensuring that new treatments are effective, especially against high arrival-rate pests

• Improved application of treatments

• Improved systems to ensure that treatments are properly applied
ISPM 15
Technical Issues

Dr. Eric Allen
Canadian Forest Service
Natural Resources Canada

June, 2014
NAPPO – APPPC
ISPM 15 Workshop
Beijing, China
Scope

- Overview of the standard
- Authorisation of compliant exports
- Import control
- Applying the treatments
Overview of the standard

Harmonized requirements ensure predictable, safe trade

Basis of the standard:
- Official treatment & marking
- NPPO import system

Certification should be the basis for entry and ongoing use

NPPOs may undertake Pest Risk Analysis (PRA) to support additional measures if required

3 treatments internationally recognised

Non-compliance should be reported in keeping with ISPM 13
Exempt commodities

- Plastic and oriented strand board
- Thin wood
- Wood shavings
- Plywood
- Wine barrels

[Images and links: capolina.com, cecilswine.com]
Elements of an official production system

- Legislative tools to support authorisation and control
- Systems to verify elements of certification (debarking, treatment and marking)
- Producer systems to ensure compliance with standard:
  - Treatment system
  - Segregation
  - Marking procedures
  - Traceability of the product as it moves through the system or to other authorised producers
  - Records attesting to treatment, production, handling and marking of compliant products
  - Security of the marking system
  - Etc.
Elements of an official production system

- Publication of information on authorised facilities
- Outreach and education
  - Identification and cooperation from the sector
  - Cooperation from users and cooperators (e.g. freight-forwarders, etc.)
- Audit and oversight
  - NPPO or authorised agency
  - Training
  - Frequency
- Follow-up on non-compliance
Marking

- Phytosanitary certificates should not be used.
- Mark must comply with Annex 2.
- Should not include additional information (e.g. dates, symbols, etc.).
- Must be easily read.
- Dunnage may require multiple marks.
Reuse, Repair and Remanufacture

- **Reuse**
  - Ongoing use without changing components
  - No requirement to re-treat or re-certify

- **Repair**
  - < 1/3 of components changed
  - Treated wood must be used
  - Mark must be affixed to the repaired components
  - No requirement to re-treat
  - Complexity in determining origin if non-compliant

- **Remanufacture**
  - > 1/3 of components changed
  - Entire unit should be retreated
  - All previous marks removed and unit re-certified
Supervision of the export system

- NPPOs cannot oversee or verify that every unit complies with requirements
- Oversight should be based on verifying that:
  - A producer’s documented procedures meeting prescribed standards and
  - Records of production and the inspection of activities or commodities to confirm compliance
- Unannounced auditing, testing, etc.
- Repair and remanufacture managed in as manner similar to the production of new WPM
Examples of auditing the system

- **Treatment**
  - Do the volumes of treated wood used match WPM produced?
  - Do records of treatment confirm the volumes of wood required for production?
  - Is the wood being used pest free?
  - Does the treatment chamber meet prescribed operating conditions;...

- **Marking of treated products –**
  - Is the mark applied only to wood which has been treated?
  - Is the mark applied after assembly?
  - Is the mark consistent with Annex 2;...

- **Security of the mark**
  - Who has access?
  - Do those that have access understand their responsibilities;...

- **Segregation**
  - Are treated and untreated products easily identified?
  - Do employees understand the requirements;...
Import control

Considerations:
- Legislation to control imported goods
- Outreach and awareness
- Availability/effective utilization of inspection resources
- Location of inspection site (e.g. at the port of entry; redirection to an inspection site; at destination; etc.)
- Requirements for import declarations to identify compliant shipments
- Equipment to conduct inspections
Import control

Considerations:

- Training/education of staff or cooperating agencies (Customs, port employees, etc.)
- Protocols for the selection of imports for inspection
- Actions to be taken on non-compliant imports
  - Separation of the commodity from the non-compliant WPM
  - Redirection or refusal of the commodity and the non-compliant WPM
  - Treatment, etc.
- Notification of non-compliance
  - Importers should be made aware of non-compliant shipments
  - Notification in keeping with ISPM 13
Import inspection

Shipment is redirected to inspection location

Gas testing

Shipment is offloaded for inspection

Some shipments inspected in place
Approved treatments

- Debarked wood should be used
  - Any residual piece < 3cm or
  - If > 3cm no more than 50 cm²

- Treatments practically eliminate the risks of pests present in the wood at time of treatment
  - Heat treatment (HT)
  - Dielectric heating (DH)
  - Methyl Bromide (MB) fumigation

- Treatment should precede marking
- Debarking should precede methyl bromide fumigation
Debarking
Heat treatment

- Heating of the wood to a specified temperature across its profile for specified period of time
  - 56°C for 30 minutes = HT
  - 60°C for 60 seconds = DH

- Heat treatment in a conventional kiln achieved by reaching specific ambient temperatures and humidity in the chamber

- Experts in wood drying technology could be used to establish treatment schedules, operating conditions

- Kiln drying which includes moisture reduction during heating of the wood may or may not achieve heat treatment
Factors influencing effective heat Treatment

- Uniformity and velocity of air flow through the wood stack
- Air circulation around the wood stack
- The presence and size of cold spots in the chamber
- Type and effectiveness of the heat source
- Type of wood being treated (species/density, size, etc.)
- Number and type of temperature and humidity measuring devices
- Efficiency of the chamber
- Size of the chamber
- Humidification and venting
- Recording devices
- etc.
Heating

- When air flows through the wood stack:
  - Its temperature decreases as energy is used in heating and evaporation
  - Its relative humidity increases as it picks up moisture from the surface of lumber
  - Its heating capacity decreases
- Increasing the relative humidity in the chamber may be used to reduce the cooling effect of moisture in the wood
- Fan reversals and increased air flows may reduce cold spots in the kiln
- The wood stack should allow for air flow over and under the stack
- The size and density of the wood should be consistent to ensure uniform heating
- Baffles may be used to direct air flows and optimize heating
Heat chamber operation

**Chamber**
Chambers should be constructed to ensure uniform heating.

**Loading**

**Air flow**
Fans should be used to maximize air flow through the wood stack. Fan reversal may be required to ensure uniform heating within the stack.
Heat chamber operation

Sensors should be regularly calibrated.
Sufficient sensors should be used to account for variation or failure in any sensor.

Wet bulb: Sensors should consider the location of cold spots in the kiln (e.g. exit side of the air flow, etc.).
Dry bulb: Spacers (stickers) should be used to maximize air flow through the wood.
Probes: Spacers (stickers) should be used to maximize air flow through the wood.
Verification of heat treatment

Option 1
- Fixed number of temperature sensors inserted into the wood to measure temperatures through each treatment
- At least two sensors located in the cold spot (slowest heating pieces)

Option 2
- Test treatment with multiple temperature sensors to identify a specific treatment schedule (ambient temperatures and other operating conditions) for a specific wood (species, size, etc.)
- Based upon the test treatments, ongoing use of the specific schedule to ensure that each treatment meets the requirements

Where treatment systems are the same, initial measurements on one kiln may be used for additional similar kilns provided other factors such as species being treated, wood size, etc. remain constant
Methyl Bromide (MB) fumigation

Annex 1: Table 1: Minimum CT for MBr

<table>
<thead>
<tr>
<th>Temperature (°C)</th>
<th>CT (g·h/m³) over 24 h</th>
<th>Minimum final concentration (g/m³) after 24 h</th>
</tr>
</thead>
<tbody>
<tr>
<td>21.0 or above</td>
<td>650</td>
<td>24</td>
</tr>
<tr>
<td>16.0 – 20.9</td>
<td>800</td>
<td>28</td>
</tr>
<tr>
<td>10.0 – 15.9</td>
<td>900</td>
<td>32</td>
</tr>
</tbody>
</table>

- Usually carried out on the basis of dose (concentration over a period of time (CT))
- CT is affected by sorption, leakage, temperature, humidity, etc.
- Table 2 of Annex 1 provides a guide to measuring treatment by way of concentration
- MB infiltrates most woods very well, but will not infiltrate large dimension timber (e.g. 20cm)
- Temperature must be > 10°C in order for the MB to remain gaseous
- Should temperatures fall below optimal, treatments should be extended or restarted
MB fumigation

- Applicators should observe good fumigation practices
  - Appropriate sealing/testing for leaks
  - Appropriate air circulation
  - Loading of chamber (not more than 80%)
  - Reduce/account for potential unwanted sorption (water, other articles within treatment area, etc.)
  - Removal of articles that may prevent fumigant penetration (impermeable wraps, etc.)
  - Temperature and dosage monitoring
  - Applicator and environment safety
MB fumigation

**Container fumigation**

Appropriate fans placed in the chamber
Sufficient lines are placed into the chamber to ensure effective dispersion of the gas

**Tarp fumigation**

Logs are used to secure the tarp
Several sheets are used to prevent leakage
ISPM implementation working group of APPPC

Working group:
Rep. of Korea (Lead),
Australia, India, New Zealand, Philippines
ISPM implementation working group

• The 26th session of the APPPC set up a working group to consider a programme to assist APPPC members implement International Standards for Phytosanitary Measures (ISPMs).
The APPPC Standards Implementation programme is intended to:
- collect information on how APPPC members are managing to implement ISPMs
- identify the major problem areas with ISPM implementation for APPPC members
- set up programmes to assist APPPC members improve their implementation of ISPMs.
ISPM implementation working group

• The method for doing this is for:
  - APPPC members to be asked, using a questionnaire, how they are managing to implement the various provisions of different ISPMs
  - for the Implementation working group to consider and analyze the results of the questionnaire and identify problem areas
  - the working group to recommend methods of improving the implementation of the relevant standards.
Questionnaire on ISPM 15 implementation

• 33 questions in 7 sessions
  - Registration of the IPPC mark
  - General implementation
  - Implementation in export
  - Implementation in import
  - each country’s mark
  - future plan
  - Improvement for ISPM 15
Results

• 17 countries responded (including Japan and Singapore) through the IPPC contact points
1. Registration of IPPC mark

Among 11 answered as registered country, 3 are not registered:
Among 5 answered as non-registered country, 2 are registered
→ understanding of status of some NPPOs on registration is not appropriate
1. Registration of IPPC mark

Desirable IPPC/APPPC activities to hasten the registration:

- Consulting from lawyer, other countries or IPPC
- Letter to your government from IPPC to request the registration
- Other

6 countries
4 countries
2 countries
1. Registration of IPPC mark

Based on APPPC questionnaire results, it was suggested that the letter from senior level FAO to the senior foreign affairs counterpart and senior Perm Rep. of member countries who does not have registration as Bureau recommendation → approved by CPM-8
1. Registration of IPPC mark

Many countries who had protection with the Madrid system or individual country system or other system had/have expired → renewal has been completed
1. Registration of IPPC mark

Why the registration is necessary?

- The mark is owned by FAO
- NPPO can legally use the mark with registration in their country

Without registration, the mark may be used by others (not legally protected)
→ trading partners cannot trust the mark from un-registered countries
1. Registration of IPPC mark

Easy process for new registration or renewal

- Contact FAO legal (Laura) for official request to register/renew
- Reimburse the cost to FAO (~1,000$ approx)
1. Implementation of ISPM 15

![Bar chart showing the number of countries that regulate WPM according to ISPM 15. 17 countries regulate for exporting, and 15 regulate for importing.](chart.png)
1. Implementation of ISPM 15

**Certification of Export WPM treatment**

- Only IPPC mark: 5
- Only Phytosanitary Certificate: 0
- IPPC mark and PC: 12

*Certification of Export WPM treatment*
1. Implementation of ISPM 15

Main cause of non-compliance of export consignment:

- 12 countries: Result of lab test
- 5 countries: Detection of live insects or traces
- 2 countries: Without IPPC mark or PC

---

International Plant Protection Convention
Protecting the world’s plant resources from pests
1. Implementation of ISPM 15

required certification for imported WPM

- 1 country
- 2 countries
- 3 countries

- IPPC mark only
- PC only
- Both IPPC mark and PC
- Treatment certificate
2. Implementation of ISPM 15: difficulties

- Short of staff: 9
- Short of training: 8
- Lack of cooperation from private sectors: 6
- No treatment facility: 1
- Lack of cooperation with customs: 1
- Increase cost: 1
3. Capacity needed

<table>
<thead>
<tr>
<th>Area</th>
<th>Concerns</th>
<th>Suggested assistance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Domestic capacity</td>
<td>No protection of IPPC mark (cost)</td>
<td>Workshop on the registration process Consultation workshop</td>
</tr>
<tr>
<td></td>
<td>Lack of understanding on importance of registration of IPPC mark</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Short of training capacity</td>
<td>Workshop on training</td>
</tr>
<tr>
<td></td>
<td>Lack of cooperation from private sectors</td>
<td>Workshop on case study of other countries</td>
</tr>
<tr>
<td></td>
<td>Lack of cooperation with customs</td>
<td></td>
</tr>
</tbody>
</table>
## 3. Capacity needed

<table>
<thead>
<tr>
<th>Area</th>
<th>Concerns</th>
<th>Suggested assistance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Domicity capacity</strong></td>
<td>Lack of registered treatment providers</td>
<td>Workshop/mentoring on</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Treatment provider registration procedure</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Requirement of treatment provider (MB, heat treatment)</td>
</tr>
<tr>
<td></td>
<td>Absence of regulation on WPM</td>
<td>Workshop/mentoring on</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Regulation of WPM</td>
</tr>
<tr>
<td></td>
<td>Absence of regulation on re-used and repaired WPM</td>
<td>Share info. on regulation of re-used and repaired WPM</td>
</tr>
<tr>
<td></td>
<td>Lack of public awareness</td>
<td>Share experience on public awareness</td>
</tr>
</tbody>
</table>
3. Capacity needed

<table>
<thead>
<tr>
<th>Domestic capacity</th>
<th>Lack of reasonable and reliable monitoring system</th>
<th>Share experience</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Lack of interlinked system between NPPO and customs</td>
<td>”</td>
</tr>
<tr>
<td></td>
<td>Too many treatment providers to audit</td>
<td>”</td>
</tr>
<tr>
<td></td>
<td>Too many WPM to monitor</td>
<td>”</td>
</tr>
<tr>
<td></td>
<td>Fraudulent stamp</td>
<td>”</td>
</tr>
<tr>
<td>Implementation of importing country</td>
<td>Dual requirement of IPPC mark and PC</td>
<td>Information sharing</td>
</tr>
<tr>
<td>------------------------------------</td>
<td>--------------------------------------</td>
<td>---------------------</td>
</tr>
<tr>
<td>Expiry date of treated WPM</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ISPM content</td>
<td>Unclear treatment method and its guideline</td>
<td>Submit to IRSS</td>
</tr>
<tr>
<td>--------------</td>
<td>------------------------------------------</td>
<td>----------------</td>
</tr>
<tr>
<td>Contaminated or dirty WPM with IPPC mark</td>
<td>Submit to SC</td>
<td></td>
</tr>
<tr>
<td>Not enough effect of the treatment on pathogens</td>
<td>“</td>
<td></td>
</tr>
<tr>
<td>Unclear guideline on repaired and re-used WPM</td>
<td>Submit IRSS</td>
<td></td>
</tr>
<tr>
<td>ISPM Interpretation</td>
<td>Consignment is WPM itself</td>
<td>Forward to IRSS</td>
</tr>
<tr>
<td>---------------------</td>
<td>---------------------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>Destination of non-compliance notification (exporting country/origin country)</td>
<td>“”</td>
<td></td>
</tr>
<tr>
<td>Not clearly visible mark</td>
<td>“”</td>
<td></td>
</tr>
<tr>
<td>Compliance of bark and marking</td>
<td>“”</td>
<td></td>
</tr>
<tr>
<td>Information sharing</td>
<td>Update list of ISPM 15 implementing countries</td>
<td>Forwarded to IRSS with Asia info.</td>
</tr>
<tr>
<td>---------------------</td>
<td>------------------------------------------------</td>
<td>---------------------------------</td>
</tr>
<tr>
<td>Others</td>
<td>Concern on MB</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Confusion of exporters with KD and IPPC mark</td>
<td>Include in info package for workshop</td>
</tr>
<tr>
<td></td>
<td>Interception live insect from WPM with IPPC mark</td>
<td>Forward to IRSS</td>
</tr>
</tbody>
</table>
Suggested work plan for ‘14~15

• ISPM 15 : follow up action

  NAPPO joint workshop (‘14)
  facilitate registration and renewal
  export certification?
  additional treatment?
• All that is necessary for WPM to enter a country is a mark on the WPM that contains the IPPC registered symbol combined with a country code, producer/treatment provider and treatment code in a stamp format suggested in Annex 2 of ISPM 15.

• NPPO’s of importing countries inspect some percentage of shipments but unless visible evidence of pests or large amounts of bark are present, the ISPM 15 mark on the WPM is accepted as evidence the WPM complies with ISPM 15 requirements.
Is Close Adequate—Which Mark Is Authorized?

Shown below are photos of typical ISPM 15 marks that show many variations from the standardized mark. These variations make acceptance difficult for importing NPPO's.
Authorized Mark

Fraudulent Mark

Note the difference in the agency trademark and lack of registered symbol.

Fraudulent Mark

Note IPPC incorrect; NeLMA incorrect.

Fraudulent Mark

Note the format of the mark is incorrect.
Note the T and P are not connected, lack of “AUDITED BY”, registered symbol.

Note the T and P are not connected, IPPC symbol, font and format differences.
When a Fraudulent/Unauthorized ISPM 15 Mark is Encountered

• The ISPM 15 trademark is registered in most countries. NPPO’s of the registering country have the responsibility to protect the trademark.

• NPPO programs should include procedures to uncover the use of fraudulent/unauthorized marks.

• Possible steps for NPPO’s to implement when a fraudulent/unauthorized mark is found:
  o Determine where the mark is being used and confiscate the mark
  o Obliterate the fraudulent/unauthorized mark from any WPM to prevent use as ISPM 15 compliant
  o Investigate where the fraudulently/unauthorized marked WPM was shipped and obliterate the marks if possible
  o Take appropriate legal action against the producers/users of the fraudulent/unauthorized mark
  o Publicize any action taken to discourage others from producing and using fraudulent/unauthorized marks
The Australian Wood Packaging Certification Scheme - Overview

Department of Agriculture (NPPO): Overarching responsibility for the AWPCS.

Joint Accreditation System of Australia and New Zealand: Accredits third party certification bodies under the AWPCS.

Certification Bodies: Assess applications and undertake onsite audits.

Treatment Providers and Manufacturers
3. Certification Bodies

Assess applications and undertake onsite audits

A company or organisation accredited by the accreditation body (JAS-ANZ) to assess the suitability of a treatment provider or wood packaging manufacturer for certification under the AWPCS.
Implementation of an export program

- March 12, 2001 E.U. imposed temporary emergency measures for coniferous wood packaging material (WPM)
  - Pinewood nematode
- October 1, 2001 E.U. fully implemented
- CFIA established certification program to comply:
  - Register facilities
  - Prescribe standards of production and handling
  - Control credibility of marking
  - Establish third party oversight of accredited facilities
  - Verify compliance of the system
Canadian export program

Since the early 1990’s Canada has had an official system for the production of certified heat treated wood

D-03-02 Canadian Heat Treated Wood Products Certification Program (CHTWPCP) for Export

- Systems approach for the production of heat treated lumber

In Canada most WPM is produced from heat treated wood

D-01-05 The Canadian Wood Packaging Certification Program (CWPCP) for Export

- Systems approach for the production of ISPM 15 compliant WPM
Canadian export program

Elements of both programs include:

- Prescribed standards for treatment and/or production - critical control points
- Control of the application of marks
- Control of source inventories, segregation of products, etc.
- Maintain records attesting to system operation (e.g. inventory and treatment records, training, etc.)
- External audits confirm compliance with standards

Canadian certified production:

- ~ 450 heat treatment facilities
- ~ 475 wood packaging manufacturers
Canadian export program

- Heat treatment
- Treated wood shipped to WPM production facility
- Traceability
- Segregation during production
- Assembly
- Certification
- Verification of compliance
- Shipment readied for export
Export non-compliance

- Canada is the world’s 12th largest exporter at $458 billion
- Canada received 31 notifications of non-compliance in 2013
- All were associated with exporters who shipped commodities on uncertified WPM
- CFIA or approved third parties conduct outreach to improve compliance
Implementation of an import program

- 2002 IPPC adopts ISPM 15, Canada, the U.S. and Mexico agreed to implement the import components of the standard in a harmonized way;
- The three countries began implementation in 2004 and fully implemented in 2006;
- Canada and the U.S. agreed to forgo implementation of ISPM 15 requirements for WPM produced in Canada or the U.S.
- Canada and the U.S. are moving to remove this exemption
Canadian import program

- Vancouver, Prince Rupert, Montreal and Halifax
- Manifested goods reviewed
- High risk shipments re-directed for breakdown inspection within a designated sufferance (bonded) warehouse
- Inspection targeting based upon:
  - Shipments likely to contain WPM,
  - Compliance history,
  - Commodity type, etc.
- About 3000 – 4000 shipments inspected annually
Compliance 2006-2007

- Compliant
- Shipments without certification (no visible signs of infestation)
- Infested shipments with or without certification

62.06% 32.62% 5.32%
Compliance 2012-2013

- Compliant: 93.50%
- Shipments without certification (no visible signs of infestation): 3.33%
- Infested shipments with or without certification: 3.17%
Examples of frequently intercepted pests

- *Arhopalus sp.*
- *Sinoxylon sp.*
- *Monochamus sp.*
- *Trichoferus sp.*
- *Siricidae*
- Unidentified Bostrichidae, Cerambycidae, Curculoinidae & Spondylidinae
Conclusions

- International implementation of ISPM 15 has reduced pest risks associated with WPM;
- However since implementation Canada continues to see about 5-6% non-compliant shipments
- About $\frac{1}{3}$ of non-compliant shipments are infested
- About $\frac{3}{4}$ of infested shipments have an IPPC mark
  - Poor treatment application?
  - Fraud?
  - Potential re-infestation, if the wood is poorly debarked?
- Non-compliance continues to present serious quarantine risks;
  - Infestations of *Agrilus planipennis*, *Anoplophora glabripennis* likely originated from infested WPM
中国进出境货物木质包装检疫监管体系
QUARANTINE MANAGEMENT SYSTEM for IMPORT & EXPORT WPM in CHINA

冯春光
国家质检总局动植司
Adoption of ISPM No.15 in China

1. Establish mandatory regulation according to ISPM 15
   • AQSIQ Decree No. 69, on Promulgating the Measures for Administration of the Quarantine Treatment of Wood Packaging Materials for Exit Cargos.
   • AQSIQ Decree No.84, on Promulgating the Measures for Administration and Supervision on Quarantine of Wood Packaging Materials Used by Entry Cargos.

2. Official announcement
   • AQSIQ Announcement No.11, 2005, Promulgating the Quarantine Requirements for Wood Packaging Materials Used to Transport Import Goods.
   • AQSIQ Announcement No. 4, 2005, Releasing the Requirements for Wood Packages of Exit Cargos.

3. Education and training for stakeholders

Benefit for adoption of ISPM No.15 in China

1. Prevent pests from spreading across border
2. Facilitate international trade
3. Strengthen cooperation and communication with international counterparties
Developing and enacting the regulations; Integrated management.

Supervising and directing local inspection and quarantine offices to implement the regulations adopted by AQSIQ at provincial level.

Monitoring the treating and marking of WPM at local level.
(1) Quarantine requirements for importing WPM

a. General requirements
b. Approval Methods for treating WPM
c. Marking requirement

(2) Guarantee measures

a. inspection
b. treatment
c. Credibility management
d. Notification on non-conformity
e. Cooperation across border
c. Marking requirement

Sample mark:
b. Phytosanitary actions taken

In the case of IPPC mark missing or pests detected, the WPM will be treated or destroyed, or refused entry of the whole consignment in case the situation is deemed to be severe enough.
d. Notification of non-compliance

AQSIQ notifies the NPPO of the exporting countries or regions of non-compliant WPM on which pests are detected or IPPC mark is missing.
5、检疫现状
中国大陆地区年进境货物木质包装200万批次以上，截获各类有害生物近4万种次。
（1）携带有害生物比例居高不下
（2）木质包装无标识比例依然较高
（3）木质包装重复使用难以有效追溯
The quarantine system for Exporting WPMs

Quarantine requirements

a. General requirements

b. Approval Methods for WPM treatment

Guarantee measures

a. certification of IPPC mark user

b. The monitoring of the treatment process

c. Random inspection at ports of exit
Approval methods for treating WPM

- Heat treatment

  minimum wood core temperature: 56°C and,
  minimum exposure time: 30 minutes;
Sample mark of CHINA for WPMs of exit goods
Accepting an application
Pre-treatment inspection
Monitoring of the treatment process
Treatment result evaluation
Supervision of the labelling
Verification
ToTopology of WPM heat treatment supervision system

AQLQ office

External network

WIF heat treatment service provider

Kiln

Exhaust outlet

Dry/wet temperature probe wire

Water content probe wire

Converter

Process monitoring

Information release

Video monitoring

Intranet

Internet

ES300 enterprise server
http://www.cnwpm.net
1. promoting the security system among trade partner to fight against illegal use of IPPC mark

2. To expedite the process of communication in the case of non-compliance, appointing contact point among NPPO and APPPC members to transmit necessary information and documents, including notification form and associated certificates, by email as an official channel.

3. Setting the technical standard of monitoring space temperature as an alternative to core temperature.
GOVERNMENT OF INDIA
MINISTRY OF AGRICULTURE
(DEPARTMENT OF AGRICULTURE AND CO-OPERATION)
DIRECTORATE OF PLANT PROTECTION, QUARANTINE, STORAGE
BY - DR. VASUDHA GAUTAM ASSISTANT DIRECTOR

APPPC/NPPO JOINT WORKSHOP ON
ISPM 15: REGULATION OF WOOD PACKAGING MATERIAL IN INTERNATIONAL TRADE
10-14 JUNE 2014, BEIJING, CHINA
The major thrust areas of plant protection are streamlining the quarantine measures and eliminating the possibilities of entry of exotic pests.

Pests associated with wood packaging material are known to have negative impacts on forest health and biodiversity.

Implementation of ISPM 15 is considered to reduce significantly the spread of pests and subsequently their negative impacts.

In 2009 (Revised) - REGULATION OF WOOD PACKAGING MATERIAL IN INTERNATIONAL TRADE
ISPM-15

- The Sanitary and Phytosanitary Agreement of WTO envisages application of Phytosanitary measures based on scientific justifications. Therefore, it is imperative to conduct all Plant Quarantine inspections as per the International Standards/guidelines.

- India has developed total 22 National Standards for Phytosanitary Measures.
<table>
<thead>
<tr>
<th>National Standards for Phytosanitary Measures (NSPM)</th>
<th>NSPM No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plant Quarantine Operation Systems Manual</td>
<td>1</td>
</tr>
<tr>
<td>Import Inspection Manual</td>
<td>2</td>
</tr>
<tr>
<td>Export Inspection Manual</td>
<td>3</td>
</tr>
<tr>
<td>Post-Entry Quarantine Inspection Manual</td>
<td>4</td>
</tr>
<tr>
<td>Pest Risk Analysis: Administrative Process Manual</td>
<td>5</td>
</tr>
<tr>
<td>Pest Risk Analysis-Technical Methodology</td>
<td>6</td>
</tr>
<tr>
<td>Guideline for Reporting Plant Quarantine Material</td>
<td>7</td>
</tr>
<tr>
<td>Guidelines for Auditing of Plant Quarantine Activities</td>
<td>8</td>
</tr>
<tr>
<td>Guideline for Certification of Forced Hot Air Treatment for Wood Packaging Material</td>
<td>9</td>
</tr>
<tr>
<td>Guideline for Export Inspection and phytosanitary certification of Fresh Mango (Mangifera indica) fruits to P.R. China</td>
<td>10</td>
</tr>
<tr>
<td>Quarantine Treatments and Application Procedures- 1. Methyl Bromide Fumigation</td>
<td>11</td>
</tr>
<tr>
<td>Guideline</td>
<td>NSPM No.</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------------------------------</td>
<td>----------</td>
</tr>
<tr>
<td>Guideline for Assessment, Accreditation &amp; Auditing of Fumigation Agencies</td>
<td>12</td>
</tr>
<tr>
<td>Requirement for establishment of PFA for Mango nut Weevil and pulp Weevil</td>
<td>13</td>
</tr>
<tr>
<td>Requirement for establishment of PFA for Tephritid fruit flies</td>
<td>14</td>
</tr>
<tr>
<td>Guidelines for certification of Hot water immersion treatment facilities</td>
<td>15</td>
</tr>
<tr>
<td>Guidelines for development of NSPM</td>
<td>16</td>
</tr>
<tr>
<td>Guidelines for Regulating Export, Import &amp; Import Release of Biological Control Agents &amp; other Beneficial Organism</td>
<td>17</td>
</tr>
<tr>
<td>Guidelines for Certification of HT facilities for Niger seed</td>
<td>18</td>
</tr>
<tr>
<td>Requirement for establishment of PFA for Brown Rot</td>
<td>19</td>
</tr>
<tr>
<td>Guidelines for certification of VHT facilities for fresh fruits</td>
<td>20</td>
</tr>
<tr>
<td>Guidelines for Certification of Irradiation Treatment Facilities for Fresh Fruits</td>
<td>21</td>
</tr>
<tr>
<td>Guidelines for Assessment, Audit and Accreditation of Fumigation Agencies for Undertaking ALP Fumigation</td>
<td>22</td>
</tr>
</tbody>
</table>
NSPM’S SUPPORTING --- ISPM 15

- **NSPM – 9**: Guidelines for Certification of Forced Hot air Treatment Facilities For Wood Packaging Material.
- **NSPM-11**: Quarantine Treatments and Application Procedures: Methyl Bromide Fumigation.
- **NSPM-12**: Guidelines for Assessment, Audit and Accreditation of fumigation agencies for undertaking Methyl Bromide Fumigation
Country experiences in implementing ISPM 15

Takashi Kawai
Yokohama Plant Protection Station
Ministry of Agriculture, Forestry and Fisheries (MAFF)
Japan
Japanese Certification System of WPM for export

Ministry of Agriculture, Forestry and Fisheries (MAFF)

Plant Protection Station

Application

Authorize (Revocation)

Annual Report
- Treated and marked records
- Result of monitoring

Authorized body
(Japan Plant Quarantine Association & Japan Lumber Inspection & Research Association)

- Verify authorized body’s activities
  - Approving and registering activities
  - Auditing activities about
    - treatment
    - marking
  - Others
Japanese Certification System of WPM for export -2

**Authorized body**

( Japan Plant Quarantine Association & Japan Lumber Inspection & Research Association )

**Monitoring treatment provider and WPM producer activities**

- Inspection about
  - Treatment Record
  - Marked Record
- Technological advice
  - Ways of Treatment or Marking
  - Storage Management of Treated WPM

**Approved Treatment Provider**

- (about 340 companies)
  - <keep documents>
    - Treated records (copy)

**Registered WPM Producer**

- (about 1850 companies)
  - <keep documents>
    - Treated records
    - Marked records

---

Application

Treated Records

Approved Treatment Provider

Treatment request

Registered WPM Producer

Issue treated records

Approve (Revocation)

Marked Records

Application

Register (Revocation)
<table>
<thead>
<tr>
<th>Fiscal Year</th>
<th>2009</th>
<th>2010</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>WPM (×1,000m³)</td>
<td>624</td>
<td>796</td>
<td>795</td>
<td>724</td>
<td>690</td>
</tr>
</tbody>
</table>

**Volume of Marked WPM Production**

Exportation of WPM in Japan
Scope of the Regulation on Imported WPM in Japan

- WPM out of ISPM 15
  (Plywood, Veneer, Particle Board etc.)
  Not subject to inspection

- WPM treated and marked in compliance with ISPM 15
  Subject to Inspection

- WPM without the mark
Importation of WPM in Japan

- **Imported WPM**
  - **WPM not specified in ISPM15**
    - **With Required Mark**
      - Inspection unnecessary
      - Disposal/Reshipment
    - **Inspection**
  - **WPM specified in ISPM15**
    - **Without Required Mark**
      - Rejection
      - Treatment
      - Disposal/Reshipment
    - **Inspection**
      - Pass
      - Approval
Importation of WPM in Japan

**WPM subject to ISPM**

- **Pallets**
- **Wooden Cases**
- **Wooden Crates**
- **Drums**
- **Wooden crates**
- **Wooden Crates**
- **Dunage**

**WPM not requiring quarantine inspection**

- Processed WPM such as Plywood, Particle Board, Oriented Strand Board, Veneer
  
  *(Photo: Plywood)*

- Others: Sawdust, shavings, Wood Wool, Wood Chip
  
  *(Left: Wood Chip, Right: Wood Wool)*
### Record of inspection of imported WPM in Japan

<table>
<thead>
<tr>
<th>Year</th>
<th>2007</th>
<th>2008</th>
<th>2009</th>
<th>2010</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Inspection</td>
<td>5,223</td>
<td>2,670</td>
<td>1,713</td>
<td>1,147</td>
<td>754</td>
<td>467</td>
<td>479</td>
</tr>
</tbody>
</table>

* In 2007, number of inspection is total from April to December

---

**Importation of WPM in Japan**

- In 2007, number of inspection is total from April to December
Importation of WPM in Japan

Detected Quarantine Pests
(2007～2013)

- Scolytidae: 38% (39)
- Bostrychidae: 18% (19)
- Cerambycidae: 14% (15)
- Nitidulidae: 8% (8)
- Curculionidae: 7% (7)
- Platypodidae: 6% (6)
- Others: 9% (9)
Status of wood packaging treatment & marking system in Korea

June 2014

Animal and Plant Quarantine Agency
1. Regulation
2. Status of WPM treatment
3. Operation of online support system
4. HTC registration procedure
5. Management of HTC
6. Procedure of heat treatment
7. Marking system
8. Training
9. Challenge & Where to go
1. Regulation

a. ISPM No. 15(IPPC)

b. Plant Protection Act
   * Registration, Cancellation of HT service
   Violation & Penalty

c. Enforcement Regulation/PPA
   * How to register, registration requirement,
     administrative measures, compliance

d. Quarantine Requirements of WPM(Notice, 2002)
   * mark registration, monitoring, how to operate
2 Status of WPM treatment

- Start HT for exporting WPM in 2001
- Registered number of HTC(620), FC(28)
- How to treat: HT(98.6%), MB(1.4%)
  - ‘13 HT: 71,962, MB: 981
- Type of WPM: pallet, W/B, skid, dunnage, timber etc.
- Operation of online support system on WPM
Operation of online support System

a. Registration of HT company/mark /staff/facility

b. Real time input HT schedule & result

a. Authority: QIA

b. Requirements for registration
   - Staff: one or more HT Technician
   - Facility: More than 20m³
   - Equipment: temperature sensor(2) & auto recording system, H & Ventilator

c. Application and registration
   - Application to QIA Regional office → on site confirm → report to headquater
   - QIA → issuance of certificate & registration on line system
a. Classification: 4 class, differentiated treatment in regular check and training
b. Monitoring by Regional QIA office
   − Regular & spot check
      * base on Treatment schedule & temperature graph online system
c. Administrative measure on non-compliance
   − correction order, warning, business suspension
a. Application → HTC
b. Input treatment schedule online system by HTC
c. Execution of treatment
   loading → sensoring → heating → measuring temp. and time
d. Report the result online system
e. Marking/Issuance of certi. by HTC
Outside & inside of HT facility
How to input HT result on System
How to issue HT certificate
a. Use of mark after registration of treatment mark based on certificate
   - authorize registered number in each mark
b. Keep QR code on each mark
c. Maintain register book for movement of mark
a. How to establish temperature sensor in facility (location, drilling and sealing)
b. How to obtain room during WPM HT
c. Use latent heat after 56°C/30 min.
d. Calibration (± 0.5 °C) of thermometer and probe (1 year)
   * Isolated storage after treatment
a. Limitation of checking due to lots of HTC and shortage of quarantine officer
b. Continuous administrative measures due to illegal use of mark including forgery and non declaration of new mark
c. Shortage of knowledge & skill due to frequent change job of HT technician
d. Requirements by importing country (marking, certificate, hitchhiking pest)
Thank you
INTRODUCTION

- WPMs are made from raw woods and often untreated to mitigate pests.
- They are the pathway to quarantine pests and pose high risk when the origin could not be ascertain and re-use by importing country for export.
- IPM 15 provide the acceptable standard to mitigate risk associated with WPMs.
- Approved treatment measures and specified mark (IPPC marking) are the basis for authorizing the entry of WPM without further requirements.
MARKING

The marking proposed for Malaysia WPM

[Diagram showing IPPC symbol on the left and 'MY - W0 MB / HT' on the right]
Procedure for Registration of WPM Treatment Service Providers

- Application – company name, competent personnel, licenses, location and description of facilities

- Auditing – equipment, record keeping, practical competency, storage and safety
Approval on the Registration of WPM Treatment Service Providers

National Technical Committee for MAFAS and MAHTAS

Technical Advisors

Auditors

Treatment providers

National Main Accreditation Committee
Monitoring

- Registration number
- Treatment Batch Running Numbers
- Record Keeping
- Unannounced Audit
- Renewal Audit
- Notification from Importing countries
Non Compliance

- Investigation by auditors
- Suspension until Approved corrective measures
- Re-auditing
- Delisting from registration
Problem and Constraints (1/2)

- Difficult to Inspection non agriculture products that have WPM normally not inspected by Quarantine Inspector
- No Marking for the above WPM and treatment could not be conducted
- No expiry date of treatment especially for re-export
- Sampling is based on non-statistical method and only 10% of the accessible area.
- Forgery of WPM making difficult to trace especially when they use the other company valid registration number
Problem and Constraints (2/2)

- Handling of WPM after treatment such as storage and transits
- Lack of man power to conduct unannounced audit to ensure compliance to the standard especially on record keeping
- Re-use and repairing of WPM by importing country for export did not comply to the making requirement and re-treatment
List of Approved Accredited Treatment Providers

- MB Fumigation – 79 Companies
- Heat Treatment – 44 Companies
- List registered approve service providers are published in www.doa.gov.my
THANK YOU
New Zealand’s ISPM 15 Experience

APPPC/NAPPO ISPM 15 Implementation Workshop
Beijing, June 2014

Shane Olsen
Manager Plant and Forestry
Plant Imports and Exports
Registered ISPM 15 Service Providers

- New Zealand operates an approved ISPM 15 service provider programme
- MPI has a standard prescribing requirements for application of ISPM 15 mark
- Approved Treatment Providers
  - 70 registered HT providers
  - 23 registered MB providers
- Approved Application of the Mark
  - 75 registered stamp providers
New Zealand’s Cargo Pathway

- NZ receives approx. 660,000 sea containers/year

- Approx. 90% of all containers carry WPM (NZ survey data)

- Approx 90% is ISPM 15 compliant

- Estimated 60,000 containers/year contain some non-compliant or untreated wood packaging
MPI Border Interventions for WPM

- All imported cargo declared using a Quarantine Declaration

- Includes specific question on whether there is wood packaging present in a consignment

- Import declaration also allows for treatment without ISPM mark e.g. treatment listed on a phytosanitary certificate
Wood Packaging Non-Compliances

• Pest contamination on WPM is low

• Few interceptions of significant forestry pests on imported WPM

• Some pest interception trends have been detected
  – Specific pathways, countries

• New focus on improving air container compliance
  – Relatively high level of non-compliance with ISPM 15
PHILIPPINES:
ISPM 15 Implementation
Session II

Joan-May T. Mozo
Plant Quarantine Officer
Plant Quarantine Service
Bureau of Plant Industry
ISPM 15 Background

- Mid 1990’s – numerous countries record increasing interceptions of insect pests in untreated wood packaging material
- In 2002, the Interim Commission on Phytosanitary Measure (ICPM) of the IPPC approved ISPM no.15 “Guidelines for Regulating Wood Packaging Material in International Trade,” to address the risk of introduction and spread of quarantine pests that may be associated with the movement of wood packaging material
• BPI issued BPI Quarantine Administrative Order no. 1 series of 2004 with the same title to implement the said standard in the Philippines (Full Implementation Date: 01 June 2005)

• April 2009 at the CPM meeting in Rome, due to several demands to improve handling and clarify ambiguity of the text and actual implementation of the said ISPM, the revision of ISPM 15 was approved.

• In 2010 BPI issued BPI Quarantine Administrative Order no. 1 series of 2010 Revised Regulation for Wood Packaging Material in International Trade (Implementation date: 01 January 2011)
Approved Treatments

a. Methyl Bromide Fumigation

<table>
<thead>
<tr>
<th>Temperature</th>
<th>Dosage (g/m³)</th>
<th>Minimum concentration (g/m³) at:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>2 h</td>
</tr>
<tr>
<td>21 °C or above</td>
<td>48</td>
<td>36</td>
</tr>
<tr>
<td>16 °C or above</td>
<td>56</td>
<td>42</td>
</tr>
<tr>
<td>10 °C or above</td>
<td>64</td>
<td>48</td>
</tr>
</tbody>
</table>

b. Heat Treatment

56°C for 30 minutes (wood core temperature)

Treatment procedure are in accordance to the Standard
Accreditation of Quarantine Treatment Providers

I. Fumigation Companies
   a. Licensed by the Fertilizer and Pesticide Authority
   b. Has the required fumigation and safety equipment
   c. Passed the actual test conducted by BPI

II. Heat Treatment Companies
   a. Has the required equipment for HT
   b. Passed the actual test conducted by BPI

<table>
<thead>
<tr>
<th>Accredited Fumigation Companies</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Accredited HT Facilities</td>
<td></td>
</tr>
</tbody>
</table>
Green in color, spray painted, rubber stamped or any practical method, batch number and treatment date must be placed outside the border of the mark.
Control of the Mark

• Each accredited QTP has its own company code (which will be used in the mark)
• All treatments are being supervised by BPI-PQS*
• Use of the mark is registered in the Phils Intellectual Property Office (IPO), and shall abide by its rules and regulations
• It is the responsibility of the accredited QTP to ensure that treatments and markings are done according to the Standard.
Philippines Experience

- <5 notifications of WPM non-compliance received per year since 2005 - conduct of investigations; provide sanctions
- Strict compliance to QTP accreditation requirements
- Approaches for inspection: from Mandatory to Risk-based
- BPI regulation covers both import and export – coordination and cooperation with the Bureau of Customs (BOC)
Philippines Experience

• REUSED WPM with Markings
  - responsibility of the exporting country (exporter)
  - inspection for signs of infestation
  - proper storage

- non-issuance of Phytosanitary Certificate
- if PC is needed, remove previous mark, re-treat and place new mark
REPORT BY SINGAPORE

Agri-Food & Veterinary Authority
Implementation of ISPM No. 15 in Singapore

* Not implemented for import

* Implemented for export to meet importing countries requirements and facilitate trade

* AVA accredits treatment providers to perform fumigation and heat treatment under ISPM No. 15
Implementation of ISPM No. 15 in Singapore

* All 48 treatment providers under the Treatment Provider Scheme (TPS)

* Adherence to requirements stated in the Scheme with strong oversight by AVA
  - general requirements
  - documentation and records
  - submission of reports
  - technical competency
Implementation of ISPM No. 15 in Singapore

*Adherence to requirements stated in the Scheme ... continue

- training
- equipment
- technical requirements
- facility requirements
- product
- treatment monitoring
- issuance of treatment certificates
- treatment records
- audit and follow up
- routine compliance evaluation
Implementation of ISPM No. 15 in Singapore

*Adherence to requirements stated in the Scheme ... continue

- non compliances
- corrective actions
- suspension
- reinstatement
- termination
Sanction Measures for Non Compliances to TPS

Suspension for minimum 1 month
- Notice of “unacceptable status” or “improper treatment” from overseas country

- Occurrence of more than 3 major non compliances in one calendar year

- Failure to report changes made to treatment operations or implement without prior approval from AVA

- Conduct treatment without designated supervising personnel or trained treatment operator

- Conduct treatment without abiding by legislative requirements of other government agencies
Sanction Measures for Non Compliances to TPS

Suspension for minimum 1 month
- Non payment of audit service conducted by AVA
- Two critical non compliances in one calendar year
- Evidence of inactivity for six months
Sanction Measures for Non Compliances to TPS

**Reinstatement**
- Complies with all corrective actions, changes and conditions for reinstatement prescribed by AVA

- Desk and site audit by AVA

- Application for reinstatement processed after suspension period
Sanction Measures for Non Compliances to TPS

Termination
- Misuse of TPS certification mark or accreditation, falsification of the treatment certificate

- Fraud or misrepresentation of any records, declaration, statement

- Commits more than 3 critical non compliances in one calendar year

- Conditions for reinstatement from a suspension are not met within specified time

- Inactive for 12 months

- Treatment provider requests for termination
Challenges Encountered in Addressing Non Compliances

1. Limited resources available to check and audit

2. Time required to train technically competent staff

3. Promote appreciation/awareness on the importance of plant health and phytosanitary measures

4. Appeal against sanction measures
Non Compliances Notification

Interceptions

Y2011 Y2012 Y2013

Interceptions

Interceptions

2011

USA 1
Italy 1
Canada 2
Brazil 5
Australia 4

Interceptions

2012

USA 1
Malaysia 1
Greece 1
Germany 2
Australia 2

Interceptions

2013

Malaysia 1
Brazil 16
Germany 1
Non Compliances Notification

Profile: Types of Non compliances associated with SWPMs from 2011-13

- Live pests: 5
- Undeclared timber: 2
- Soil detected: 2
- No ISPM 15 marking: 16

APPCC/NPPO JOINT WORKSHOP ON ISPM NO. 15: REGULATION OF WOOD PACKAGING MATERIAL IN INTERNATIONAL TRADE 10 – 14 JUNE 2014 BEIJING, CHINA
Non Compliances Notification

Observations
1. Some exporting companies are foreign companies

2. Inadequate information (i) only names and address of companies and the number of interceptions related to the companies stated, (ii) ISPM identifier (SG-02-HT-DB)

3. Notifications received at six months interval
Non Compliance Notification

Suggestions

1. Timely notification for effective corrective actions

2. Establish bilaterally (maybe) a timeframe for notification, corrective actions and report on corrective actions to reduce repeat non compliances by the same companies

3. Communication, besides thru IPPC contact point, with operational personnel as well
Non Compliance Notification

Suggestions

4. Adequate information provided for investigation:
   - Name and address of exporter
   - Mode and means of transport
   - Documents (bill of lading, phytosanitary/treatment certificate number if applicable, invoice)
   - Description of the SWPMs
   - Distinguishing marks on SWPMs
   - Quantity not in compliance
THANK YOU
Thailand Presentation
On
Country Experiences in Implementing of ISPM No.15

Mr. Chusak Wongwichakorn
Senior Agricultural Research Specialist
Department of Agriculture
THAILAND
- Thailand has implemented ISPM No.15 for export since 2004
- Export Plant Quarantine Service
  Office of Agricultural Regulation
  Department of Agriculture
- Plant Quarantine Station
Procedure for Registration of WPMs Producers and Treatment Providers

• Meeting with the exporters, WPMs producers, Treatment Providers to facilitate understanding of ISPM No.15
• Auditor’s Training
  • ISPM No.15
  • Australian fumigation accreditation scheme (AFAS)
  • Heat Treatment
Documentation for registration

- Application Form
- Audit Check lists for MB and HT
- Registration form for approved accredited WPMs producers
Auditing for registration

• Application – company name, address, license, competent personal, location
• Auditing – location, equipment, facilities, storage area, safety, demonstration of treatment
• Understanding of ISPM No.15
MB auditing

- License fumigator
- Equipment
- Fumigation meet the standard
- Safety
HT auditing

- Competent personal
- Heat chamber
- Equipment
- Treatment meet standard
Approval

• Auditor submit all the documents to the technical committees
• Technical committees consideration for approval
Issuance of Registration Form

• Approval WPMs producers or Treatment provider will get DOA Registration form
• Registration valid for 1 year
• Authorize signed by DOA
Thailand Registration Form for ISPM No.15
Monitoring

- Validity of Registration
- Record keeping
- Unannounced Audit
- Non-compliance notification
- Treatment demonstration
Non-Compliance

- Warning
- Suspension and corrective action require (CAR)
- Withdraw
Problem and Constraints

- Thailand haven’t implemented ISPM No.15 for importation
- Lack of auditors to conduct unannounced audit
- Fraudulent records
- No record keeping
- Treatment were not in standard
- Invalid registration number
List of Approved Accredited WPMs producers and Treatment Providers

- MB Fumigation – 470 companies
- Heat Treatment – 345 companies
- The list of registered approved WPMs producers and Treatment Providers are published in www.doa.go.th
THANK YOU
THE USDA EXPERIENCE OF ISPM 15

An Overview of the U.S. Implementation of the International Wood Packaging Regulations for Exports and Imports
Three Tier Audit Program—Heat Treatment Program

- Inspection Agencies audit Manufacturers
  - Monthly check for: work plan compliance, review of heat chamber records, and inspection of HT lumber

- ALSC audits Inspection Agencies
  - Monthly for: work plan compliance, consolidated reports, and Quality Control procedures
  - On-site audits of Manufacturers with Inspection Agencies

- APHIS audits ALSC and Inspection Agencies
  - Semi-annually for compliance with MOU
  - Periodic Field Audits of Manufacturers with Inspection Agencies
Summary of How the ALSC System Enables WPM to be Labeled Heat Treated in Compliance with the ISPM 15

Department of Commerce

PS 20 - American Softwood Lumber Standard

ALSC

Board of Review

Accredits Heat Treated Lumber Agency

- Manufactures and subjects lumber to heat treating process labeling lumber HT or
- Remanufactures ALS agency HT grade marked lumber labeling product HT

Provides Service to HT Lumber Producer

WPM producer purchases ALS agency HT labeled lumber and builds HT WPM with this lumber

WPM producer can label WPM as heat treated in compliance with ISPM 15

Accredits WPM Agency

Provides Service to WPM Producer

WPM producer builds WPM from non-heat treated lumber

WPM producer places WPM in heat chamber and heats WPM to achieve 56⁰C/30 min
Attachment A:

Typical Marks of the 30 ALSC Accredited Untreated Agencies Placed on Lumber Indicating the Lumber Has Been Heat Treated In Compliance With ISPM 15

- Accredited agency insignia
- HT designation signifying lumber has been heat treated to 56°C for at the core for a minimum of 30 minutes
- Unique number assigned to the producer of the HT lumber
Organization of Fumigation Program

National Wooden Pallet and Container Association

USDA APHIS PPQ

5 Inspection Agencies

84 Enrolled Manufacturers
Use of ISPM 15 Compliant WPM

- WPM that is marked and certified in compliance with ISPM 15 may be reused regardless of country of origin

- ISPM 15 compliant WPM that has been repaired or remanufactured must be recertified under the HT or fumigation option
Import Regulations

WPM Enforcement

Homeland Security Inspections by Customs and Border Protection (CBP)

- Target through manifest review
- Physical inspection of shipments
- 2,000 Agriculture Specialist
- 18,000 Cross-trained CBP inspectors
What happens to *non-compliant* shipments that enter the US?

**At the expense of the importer:**
- WPM that does not have the ISPM 15 stamp must be re-exported
- WPM that has the ISPM15 stamp but is found to contain a wood boring pest must be re-exported
- WPM that has the ISPM 15 stamp but is found with a hitchhiking pest (non wood boring) *may* be fumigated by APHIS/PPQ
What happens to non-compliant shipments that enter the US?

At the election of the Dept of Homeland Security:

- A Port Director may allow the cargo to be separated from the non-compliant WPM that must be re-exported IF pest risk permits separation of WPM from cargo and IF they have the resources (staff and overtime) to oversee the reconditioning

- Otherwise both WPM & cargo will be re-exported
## Annual Interception Total

### Count from 4/1/2013 - 5/27/2014

<table>
<thead>
<tr>
<th>Row Labels</th>
<th>Count of Serial Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Both NC for No Markings and Timber Pest</td>
<td>21</td>
</tr>
<tr>
<td>Non Compliant-No Markings</td>
<td>2735</td>
</tr>
<tr>
<td>Non Compliant-Timber Pest</td>
<td>871</td>
</tr>
<tr>
<td><strong>Grand Total</strong></td>
<td><strong>3627</strong></td>
</tr>
</tbody>
</table>

### WPM with Pests

<table>
<thead>
<tr>
<th>Row Labels</th>
<th>Pest</th>
<th>Pest, Lacking ISPM 15 Marking</th>
<th>Pest, Lacking ISPM 15 Marking, Contaminant - Seed</th>
<th>Grand Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Both NC for No Markings and Timber Pest</td>
<td>12</td>
<td>2</td>
<td></td>
<td>14</td>
</tr>
<tr>
<td>Non Compliant-No Markings</td>
<td>29</td>
<td>13</td>
<td></td>
<td>46</td>
</tr>
<tr>
<td>Non Compliant-Timber Pest</td>
<td>851</td>
<td></td>
<td></td>
<td>851</td>
</tr>
<tr>
<td><strong>Grand Total</strong></td>
<td><strong>892</strong></td>
<td><strong>15</strong></td>
<td><strong>4</strong></td>
<td><strong>911</strong></td>
</tr>
</tbody>
</table>
Challenges of Program

- Dunnage from bulk carriers
- Identifying shipments for inspection
- Insuring education of all sectors of industry
  - Past Practices
  - Current Practices
- Non-agricultural shipments
Resources Used

- From 1997 – 2006 the initial cost of ALB eradication was $800 million
- EAB was first found in 2003
  - By 2011 trees cut exceeded 50 million
Joint Inspection

• Legal boundaries
• Piloting of information sharing
Fraudulent Stamps

• Portsmouth Virginia
Fraudulent Stamps

- Portsmouth Virginia
Noncompliant Stamp
Noncompliant Stamp
Noncompliant Stamp
Overly Cautious
If you would like a copy of this presentation, please send me an email:

john.t.jones@aphis.usda.gov

Thank you for your attention!
Blue Stain Fungi (BSF)

2008 - BSF on wood packaging was routinely being detected on ISPM 15-certified wood packaging during border inspections.

Plant Import Operations sought advice about what to do when BSF is detected.
Number of non-compliances reported to NPPO 2009-2014
Number of ISPM 15 non-compliance reported to NPPO 2009 to 2014

![Bar chart showing the number of ISPM 15 non-compliance reported to NPPO from 2009 to 2014. The bar chart indicates a decrease in non-compliance over the years, with the highest number in 2009 and the lowest in 2014.](chart.png)
Thankyou
Abstract

ONE

Procedure for Handling Notifications of Non-compliance Wood Package of Export Cargos

TWO

Investigation and Analysis on Notifications of Non-compliance Wood Package of Export Cargos
1. Procedure for Handling Notifications of Non-compliance Wood Packaging Materials of Export Cargos

- Receive and input the notifications by the Department of Supervision on Animal and Plant Quarantine.
- Receive and Circulate the notifications by CIQs directly under AQSIQ.
- Branch bureau carries out investigation and reports to CIQs directly under AQSIQ.
- CIQs directly under AQSIQ make review and feedback through the information platform.
- The Department of Supervision on Animal and Plant Quarantine deals with the investigation results.
1.1 Receive and input notifications

- AQSIQ receives notifications through IPPC contact points, embassies in China, etc.
- Translate, edit and input the information of notifications into the information platform and circulate it to CIQs directly under AQSIQ
2.4 Reasons of notifications

Reasons why wood packages were notified:

- No ISPM15 marks/unqualified marks
- Pests found (such as living, eggs, wormhole), objects prohibited from entering into the country (such as bark, etc.)
- Other reasons (such as nonconformity with the quarantine procedures of importing countries, etc.)

A -- No ISPM15 marks/untreated WPM/unqualified marks
B -- Pests found, objects prohibited from entering into the country (such as bark, etc.)
C -- Other reasons
2.5 Reasons notified

Reasons why wood packages were notified:
• Unfamiliar with ISPM15 standard by the enterprises
• Fake information by export enterprises
• Improper storage and transport
• Improper processing measures by processors
• Other reasons

A -- Unfamiliar with ISPM15 standards by the enterprises
B -- Fake information by export enterprises
C -- other reasons
D -- Improper storage and transport
E -- Improper processing measures by processors
2.5.2 Export enterprises information

- Forged ISPM15 marks
- Forged enterprise Information
2.5.5 Other Reasons

- Repeated Notifications
Relevant Measures

- Relevant measures have been taken to deal with the cases.
Thank You!

Tel: 8610-84603702
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Exporting countries (regions) of non-compliant WPM in 2013

No IPPC Mark

- United States: 3242
- Germany: 1876
- Korea: 789
- Italy: 657
- Japan: 633
- France: 507
- Taiwan: 447
- India: 390
- Hong Kong: 337
- Netherlands: 267
Exporting countries (regions) of non-compliant WPM in 2013

- United States: 124
- India: 91
- Korea: 82
- Germany: 79
- Malaysia: 77
- Indonesia: 55
- Taiwan: 48
- Singapore: 36
- Russia: 35
- Belarus: 32

Pests Intercepted
Statistics of pests intercepted in 2013

- Number of interceptions: 815
- Variety of pests:
  - Insect: 354
  - Nematodes: 121
  - Other: 3
Automatic notification

- United States
- Canadian
- Mexico
- European Union
- Wood
- WPM
- No IPPC Mark
- Pests
Automatic notification for non-compliant WPM during the first quarter of 2014

![Graph showing pests intercepted and IPPC mark compliance by region.]

<table>
<thead>
<tr>
<th>Region</th>
<th>Pests Intercepted</th>
<th>No IPPC Mark</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU</td>
<td>18</td>
<td>800</td>
</tr>
<tr>
<td>US</td>
<td>14</td>
<td>587</td>
</tr>
<tr>
<td>Canada</td>
<td>0</td>
<td>38</td>
</tr>
<tr>
<td>Mexico</td>
<td>2</td>
<td>22</td>
</tr>
</tbody>
</table>
Thank you!
Non-Compliance Notification

Takashi Kawai
Yokohama Plant Protection Station
Ministry of Agriculture, Forestry and Fisheries (MAFF)
Japan
Importation of WPM in Japan

Example of non-compliance

Damaged hole

*Heterobostrychus aequalis*
Management of Non-Compliance in ISPM15

Yusof Othman
Plant Biosecurity Division, Malaysia
Introduction

Non compliance of WPMs among the important issues are:

- Does not carry the required IPPC marking
- Carried the required mark but intercepted with live pests
- Re-use or re-export and the making is from the original country
- ISPM 15 stated that for non compliance - treatment, disposal or refused entry action could be taken. The NPPO of the exporting country may also be notified
Among WPM products that have been intercepted associated with non compliance

- Pallets,
- Crate,
- Packing Blocks,
- Drums,
- Cases,
- Pallet Collars, And
- Skids
Management of WPM compliance (Export)

- Company receiving the notification on the non-compliance will be investigated.
- Company proof to be the cause of the non-compliance will be suspended until corrective action taken and to the satisfaction of the auditors, the technical committee and main accreditation committee.
- Corrective actions by the company have to be taken within 2 weeks of notification received.
- Non ratification conducted after 3 consecutive warning of unsatisfactory corrective actions will lead to the delisting of the company from the approved WPM treatment service provider.
Management of WPM non compliance (import)

- Record on the non-compliance will be sent to centralise unit (SPS management unit of the plant Biosecurity Division)
- Collection of information on the non-compliance to fulfilled the ISPM 13 notification requirements
- Notification of the non-compliance will be send to NPPO of the exporting country through SPS unit of Plant Biosecurity Division
- Inspection on the WPM from the non-compliance country will be intensified to ensure compliance
- All new interception of WPM with live insects will be destroyed or treated based on identity of the insect found
- Further interception from non-compliance country will lead to refuse entry by the inspector at the entry point until NPPO of the exporting country conduct corrective action to prevent infestation of live insect
Information requirement for traceability in Malaysia

- Treatment provider registration number
- Treatment type (MB or HT)
- Exporter name and address
- Last port departure/exporting country
- Batch/running number
Diagnostic Procedure in Malaysia

Sample (Entry points/Phytosanitary Inspection) → Post Entry Quarantine Laboratory → Specialised Pest and disease Central Laboratory → Result sent back to Entry Points/Phytosanitary Inspection → SPS Unit for Notification

SPS Unit for Notification
Thank You
PHILIPPINES:
ISPM 15 Implementation
Session III

Joan-May T. Mozo
Plant Quarantine Officer
Plant Quarantine Service
Bureau of Plant Industry
## Phils WPM Statistics

<table>
<thead>
<tr>
<th></th>
<th>2012</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Export</td>
<td>690.65 MT</td>
<td>4,181.53 MT</td>
</tr>
<tr>
<td>Import</td>
<td>7,426.53 MT</td>
<td>4,412.50 MT</td>
</tr>
</tbody>
</table>
Non-Compliance Notifications

• For exported WPM, <5 notifications of WPM non-compliance received per year since 2005
  - USA, EU, Australia
  - investigations being conducted
  - documentations submitted to the BPI-PQS Central Office
  - QTP when found at fault, will be warned, suspended or blacklisted
  - other parties involved will be warned
Documentation

• Phytosanitary Certificate covered by the notification
• Treatment Certificate/details
• Inspection report by the PQ Officer
• Other documentation (packing list, export declaration, bill of lading, etc)
• If pest is found, proper identification of pest with pictures
• Corrective Actions
• Reporting back
Non Compliances Notification

Interceptions

Y2011 Y2012 Y2013

Interceptions

Interceptions

2011

USA 1
Italy 1
Canada 2
Brazil 5
Australia 4

Interceptions

2013

Malaysia 1
Brazil 16
Germany 1

Interceptions

2012

USA 1
Malaysia 1
Greece 1
Germany 2
Australia 2

Interceptions
Non Compliances Notification

Profile: Types of Non compliances associated with SWPMs from 2011-13

- Live pests: 5
- Undeclared timber: 2
- Soil detected: 2
- No ISPM 15 marking: 16
Non Compliances Notification

Observations
1. Some exporting companies are foreign companies

2. Inadequate information (i) only names and address of companies and the number of interceptions related to the companies stated, (ii) ISPM identifier (SG-02-HT-DB)

3. Notifications received at six months interval
Non Compliance Notification

Suggestions

1. Timely notification for effective corrective actions

2. Establish bilaterally (maybe) a timeframe for notification, corrective actions and report on corrective actions to reduce repeat non compliances by the same companies

3. Communication, besides thru IPPC contact point, with operational personnel as well
Non Compliance Notification

Suggestions

4. Adequate information provided for investigation:
   - Name and address of exporter
   - Mode and means of transport
   - Documents (bill of lading, phytosanitary/treatment certificate number if applicable, invoice)
   - Description of the SWPMs
   - Distinguishing marks on SWPMs
   - Quantity not in compliance
THANK YOU
Thailand Presentation
On
Country Experiences in Implementing of ISPM No.15

Mr. Chusak Wongwichakorn
Senior Agricultural Research Specialist
Department of Agriculture
THAILAND
- Thailand has implemented ISPM No.15 for export since 2004
- Export Plant Quarantine Service
  Office of Agricultural Regulation
  Department of Agriculture
- Plant Quarantine Station
Procedure for Registration of WPMs Producers and Treatment Providers

- Meeting with the exporters, WPMs producers, Treatment Providers to facilitate understanding of ISPM No.15
- Auditor’s Training
  - ISPM No.15
  - Australian fumigation accreditation scheme (AFAS)
  - Heat Treatment
Documentation for registration

- Application Form
- Audit Check lists for MB and HT
- Registration form for approved accredited WPMs producers
Auditing for registration

• Application – company name, address, license, competent personal, location
• Auditing – location, equipment, facilities, storage area, safety, demonstration of treatment
• Understanding of ISPM No.15
MB auditing

- License fumigator
- Equipment
- Fumigation meet the standard
- Safety
HT auditing

- Competent personal
- Heat chamber
- Equipment
- Treatment meet standard
Approval

- Auditor submit all the documents to the technical committees
- Technical committees consideration for approval
Issuance of Registration Form

- Approval WPMs producers or Treatment provider will get DOA Registration form
- Registration valid for 1 year
- Authorize signed by DOA
Thailand Registration Form for ISPM No.15
Monitoring

- Validity of Registration
- Record keeping
- Unannounced Audit
- Non-compliance notification
- Treatment demonstration
Non-Compliance

• Warning
• Suspension and corrective action require (CAR)
• Withdraw
Problem and Constraints

• Thailand haven’t implemented ISPM No.15 for importation
• Lack of auditors to conduct unannounced audit
• Fraudulent records
• No record keeping
• Treatment were not in standard
• Invalid registration number
List of Approved Accredited WPMs producers and Treatment Providers

- MB Fumigation – 470 companies
- Heat Treatment – 345 companies
- The list of registered approved WPMs producers and Treatment Providers are published in www.doa.go.th
Management of Non – Compliance in ISPM 15 for export

Mr. Chusak Wongwichakorn
Senior Agricultural Research Specialist
Department of Agriculture
THAILAND
Non-compliance of WPMs for export are:

- No marking of exported WPMs
- Live insect found on WPMs at port of entry
- Live insect found after a period of time
Type of WPMs that have been notified

- Pallets
- Cases
Management of WPMs non-compliance (Export)

- Investigation conducted by auditor
- Company proof to be caused of non-compliance will be suspended or withdrawn the registration number
- Corrective action must be done until satisfactory
THANK YOU