

PALLET PHYTOSANITARY PROJECT NEWSLETTER



A Cooperative Effort of the Limestone Bluffs Resource Conservation and Development Area And The Wood Education and Resource Center

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REGULATORY UPDATE

Implementation of ISPM 15

The intent of ISPM 15 was to provide a uniform, standard mechanism for regulating the use of WPM (wood packaging material) in international trade by all the countries participating in the International Plant Protection Convention. Unfortunately, the converging complexities of international trade, involving dozens of countries with different capabilities, attitudes, bureaucracies, and resources has resulted in a process fraught with frustrations.

Among the most frustrating aspects of the process concerns the implementation and enforcement schedule of ISPM 15 by the participating IPPC countries. Following is a country-by-country implementation update for a number of countries that have at one point indicated intent to implement ISPM 15.

United States

APHIS has indicated that the final rule for regulating the Importation of Wood Packaging Material should be released by the third quarter of 2004. A one-year grace period is planned during

which enforcement penalties will not be levied. APHIS began encouraging all importers, beginning January 2004, to use ISPM-15 compliant WPM.

European Union

Subject to final adoption, the European Commission has indicated that all EU nations will implement ISPM 15 beginning March 1, 2005. The latest position with regard to bark is that the EU will make a distinction between situations in which wood must be bark-free and where it must be debarked, utilizing the FAO Glossary of Phytosanitary Terms definitions. According to the FAO definition, debarking is the removal of bark from round wood, but debarking does not necessarily make the wood bark-free. Bark-free is defined as wood from which all bark excluding the vascular cambium, ingrown bark around knots, and bark pockets between rings of annual growth has been removed.

China

The China NPPO has yet to decide when it will implement their WPM regulations. Based on communications with USDA-APHIS, China has indicated that they will provide advance notice of implementation and a phase-in

period. Currently, heat treatment with certification through APHIS is the only option for softwood WPM. Hardwood WPM remains exempt, but the necessary declaration must accompany hardwood shipments.

Argentina

No move has been made to implement ISPM. However, the Southern Common Market (MERCOSUR) and the Agricultural Sanitary Agency of Southern South America (COSAVE) have recommended that their member states, including Argentina, adopt the phytosanitary measures for WPM.

Australia

Australia will begin implementation and enforcement of ISPM 15 on September 1, 2004. Until implementation, Australia has the additional requirement that WPM must have been treated and containerized within a 21-day period.

AQIS has also indicated that it will maintain three requirements in their final rule that are not included in ISPM 15: 1) bark free wood; 2) higher methyl bromide dosages and longer treatment exposure; and, 3) timber no greater than 200 mm (8 inches) in diameter in the smallest dimension

Brazil

The Secretary for Plant and Animal Health Protection implemented emergency regulations in line with ISPM 15 retroactively to January 2004.

Canada

April 1, 2005 has been established by the Canadian Food Inspection Agency as the implementation and strict enforcement date for ISPM-15. Any

non-compliant WPM will be summarily rejected and returned to its originating location. Any costs of retuning the rejected shipment to its point of origin will be the responsibility of the shipper. Only the US will be granted an exemption under the Canadian rule.

Colombia

The Colombian Agricultural Institute has made WTO notification that Colombia has retroactively implemented ISPM 15, effective June 9, 2004.

India

The implementation date, according to India's Ministry of Agriculture, has been moved from June 1, 2004 to November 1, 2004. In addition, the Ministry indicated that a phytosanitary certificate is not required when the WPM is treated and marked according to ISPM-15.

Korea

The Korean National Plant Quarantine Service has formally published its rule for adopting ISPM 15. Implementation has been set for June 1, 2005. At the time of implementation, Korea will only accept heat-treated coniferous WPM. Hardwood WPM can be either heat-treated or methyl bromide fumigated.

Japan

Japan has elected to not consider ISPM 15 implementation for the foreseeable future.

Mexico

A phase-in period began on January 2004, with no specific details

regarding import requirements. In spite of a lack of detail in their implementation policies, some enforcement is ongoing. There has been some indication that a final rule will not be released before the end of 2004, with implementation mid-year 2005.

New Zealand

New Zealand has fully implemented and is enforcing ISPM 15.

Philippines

The Philippines Department of Agriculture has indicated that the Philippines will adopt ISPM 15, with full implementation to begin on June 1, 2005. Beginning January 1, 2005 a partial enforcement of ISPM 15 will take effect. The partial enforcement will require WPM to be treated but marking will not be required.

South Africa

South Africa has announced their intention to adopt WPM regulations in accordance with ISPM 15, with a proposed implementation date of January 1, 2005.

Switzerland

Legislation has been enacted that adopts ISPM 15. Implementation will take place on March 1, 2005, timed to coincide with EU implementation.

Taiwan

The Bureau of Animal and Plant Health Inspection and Quarantine has indicated their intent to revise their importation regulations to meet ISPM 15 standards. Implementation has been scheduled for October 1, 2004.

International Forestry Quarantine Research Group (IFQRG) Discussion Forum

The last newsletter identified the formation of the IFQRG international list-serve discussion forum to address questions arising from the international implementation of ISPM No. 15. The forum is moderated by Roddie Burgess of the United Kingdom, chair of the IFQRG subcommittee on ISPM No. 15. The intent is to seek consensus on the questions posed by forum participants, but will not hold any official status. Currently, there are 17 questions posted on the IFQRG website for debate. Proposed answers have been amended to reflect comments received and reflect the current consensus among participants.

Following are a couple of the questions being debated and the current consensus among those providing input:

Question 10. Is kiln drying the same as heat treatment?

No, they are separate processes. Kiln drying is a process designed primarily to reduce moisture content of the wood to below, typically, 20 percent. It uses artificial heat, but there is no minimum requirement for temperature and some kiln temperatures are too low to ensure that all pests present are killed. Heat treatment is a process relying on a minimum wood core temperature of 56°C being reached and maintained for at least 30 minutes. This specification has been proved to be effective at killing quarantine pests at all life stages.

Question 13. How long could WPM be protected against insect and fungi infestation once it is heat-treated and/or kiln dried, or fumigated? (This is of concern in several countries where exporters may store wood packaging material for long periods before use).

Both of the approved measures (heat treatment and methyl bromide fumigation) are only effective against pests present at the time of the treatment. Technically, treated wood is susceptible to infestation immediately after treatment is concluded—especially if the wood has not been debarked. If, however, the wood has also been kiln-dried to below 20 percent moisture content, then fungal growth will be inhibited and many pests will not be able to survive either. Exceptions to this general rule are termites and certain drywood borers (Lyctidae).

In order to have access to the discussion forum and to provide input, send an email to:

mailserve@mailserv.fao.org

To complete the subscription process, leave the subject area of the email blank and enter the following one-line in the message portion of the e-mail:

subscribe ISPM-15-L

This is an excellent way to stay informed about the critical issues involved in the implementation of ISPM No. 15 and to offer input to the international community.

Methyl Bromide Treatment Program

Registered Fumigators

Fumigation companies continue to be registered through the NWPCA (National Wooden Pallet and Container Association) Methyl Bromide Program. These companies have been qualified by one of the three inspection agencies to perform WPM fumigations. Several companies have been added to list since the last newsletter. Contact information for these companies follows:

Ecolab

414 Riverwood Drive
Flushing, MI 48433

or

PO Box 6007
Grand Forks, ND 58206
Phone: 800-325-1671
Fax: 810-659-3672

Contact: Lauren Ashley

Email:

contract.administration@ecolab.com

Fumiregio Corp.

4005 W. Business 83
McAllen, TX 78501

Phone: 956-618-1395

Fax: 956-928-0555 Fax

Contact: Orlando Villareal

Email: Orlando.villareal@prodigy.net

Pallet Source, Inc.

228 Mt. Pleasant Rd.
Mt. Pleasant, MS 38649

Phone: 662-851-3118

Contact: Brandon Mitchell

Email: bmitchell@gabbyspallets.com

J.C. Ehrlich Co.

500 Spring Ridge Drive
Reading, PA 19612

Phone: 610-372-9200

Fax: 610-378-9525

Contact: George Fidler

Website: www.jcehrlich.com

National Fumigation and Termite Services, Inc.

PO Box 598 (Port of Houston)

Baytown, TX 77522

Phone: 281-839-1295

Fax: 281-839-1294

Contact: Joe Sutterly
Stacy Sigers

Email:

National-Fumigation@worldnet.att.net

Rose Exterminators/Fisher Pest Control

1130 Livernois

Troy, MI 48099

Phone: 248-588-7005

Fax: 248-585-5518

Contact: John Lemmons

Website: www.roseexterminator.com

Western Fumigation

10 Industrial Highway

Mail Stop #52

Lester, PA 19029

Phone: 610-595-2100

Fax: 610-595-2103

Contact: Kurt S. Reichert
Ginny Bryson

Additional information on registered fumigation companies and the Methyl Bromide Fumigation Program can be obtained by contacting NWPCA at (703) 519-6104. As new fumigation companies are registered, the information will be posted on the NWPCA website at:

www.palletcentral.com

Once on the NWPCA site, information on the Methyl Bromide Fumigation Program can be accessed by selecting "Resource Center", then selecting "Export Treatment Methods", and finally, selecting "Fumigation". A number of selections are available once the "Fumigation" section is accessed.

MISCELLANEOUS

Please feel free to distribute this newsletter via email or hard copy to all interested parties.

This issue of the newsletter and all subsequent issues will be posted on the following USDA Forest Service website:

www.na.fs.fed.us/econaction/palletnews.

Suggestions and items for upcoming newsletter issues are welcomed. Contact Curt Hassler, Project Manager, at (304) 282-5417 or via email at curth@mail.wvnet.edu.
