

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

Problems in International Shipments Using Wood Packaging Material (WPM)

Several individuals were kind enough to respond to the request in the last newsletter to provide examples of problems and issues they have encountered or heard about from others with respect to international shipments containing Wood Packaging Material.

Several of the comments were specific to China. These include:

- There is an inconsistent application of the phytosanitary regulations in China, which translates to WPM being treated differently in different ports, on different days, and by different inspectors.
- Materials heat-treated to international specifications are not being accepted because an arbitrary expiration date is being applied to the accompanying documentation.
- Materials that should be acceptable under current regulations are being held up. A

common reason for holding up shipments involves hardwood species being mistaken for coniferous material.

- Because of the uncertainties in exporting products to China, one company has had customers demand plywood or other non-regulated material for their packaging. From the company's perspective, this can be relatively simple for normal pallets, but much more difficult for sophisticated crates containing ramps, cushions, and other accessories.
- Shipments including 100 percent plywood packaging have been held up by USDA prior to export to China. When these shipments go out under the company's purchase document they are not stopped, but when the identical item goes out under a purchase document of one of their third party business partners the shipment is held up.

Other more general problems include:

- A recurring problem involves products with packaging materials originating in one country then re-exported from another. For example, a product made and packaged in Country A is shipped

to Country B for final configuration and merged with other support products. In this case, Country B won't accept the certification of the wood packaging material from Country A in order to export the product out of Country B. The Country B NPPO (National Plant Protection Organization) does not have jurisdiction to evaluate the adequacy of the treatment done in Country A despite the presence of treatment certifications from vendors.

- A US company was contacted by one of their Asian customers requesting certification that their pallets were manufactured from non-coniferous wood species. Although, the US manufacturer had letters from their suppliers of wood packaging material confirming the species composition as hardwood, their customers wanted something more analytical in the form of a "test" to prove the claim.
- Recently, a shipment of crates from a European Union Country was stopped in China because of the presence of bark and worms. The worms were actually found on the plywood portion of the crates. The bark was on the 4x4 runners supporting the crate. The pallet base was marked HT and had supporting government HT certificates. There were also worms found elsewhere in the ocean container. The source and species of the worms is unknown, but their mere presence alarmed inspectors and has caused an extended delay in the delivery of the products contained in the shipment.

Methyl Bromide

Previous issues of this newsletter have updated the status of methyl bromide usage for Wood Packaging Material (WPM). The operative requirements and regulations fall under Quarantine and Preshipment Applications of Methyl Bromide. For the purposes of international shipment of WPM these applications allow unrestricted use of methyl bromide for fumigation purposes. On January 3, 2003 the Environmental Protection Agency codified these exemptions in the US by publishing final rule 40 CFR 82, "Protection of Stratospheric Ozone: Process for Exempting Quarantine and Preshipment Applications of Methyl Bromide". These exemptions remain in place and will remain so unless specific action is taken to amend or cancel them.

Methyl bromide is also used in many other applications, particularly as an agricultural fumigant. These applications are governed by a different set of regulations than those for WPM in international shipments. Recent headlines have focused on the controversy over the continued use of methyl bromide in these applications.

Under the terms of the Montreal Protocol (the international agreement designed to phase-out ozone depleting chemicals), developed countries agreed to phase out their consumption of methyl bromide and other ozone depleting chemicals, by January 1, 2005. However, farmers (including strawberry, melon, pepper and tomato growers and flour millers), primarily in North America, Australia, and Europe have argued that currently available alternatives are not technically or economically feasible. These countries requested the Parties to the Montreal Protocol for exemptions amounting to around 15,000 tons of

methyl bromide for the year 2005. The US, specifically, requested a critical use exemption for two years, starting in 2005, amounting to 39 percent of current baseline methyl bromide consumption in 2005 and 37 percent in 2006.

At a November 2003 meeting of the United Nations Environmental Programme in Nairobi, Kenya the US, Canada, and Australia came under fire for their critical use exemption requests. One fumigator in attendance pointed out that his company had worked with a number of companies to successfully replace methyl bromide with other alternatives and that those companies should not be penalized by critical use exemptions. After lengthy discussions, extending over 5 days and 5 nights, no consensus was reached regarding the handling of the critical use exemption requests. An "extraordinary meeting", to be hosted by UNEP in Montreal, Canada has been scheduled for March 2004 to continue discussions of the critical use exemption requests.

The key here for those involved with WPM is that the critical use exemption issue not be confused with quarantine and preshipment exemptions for WPM in international shipments. The quarantine and preshipment exemptions remain in place for the continued usage of methyl bromide fumigation of WPM under ISPM 15 (International Standards for Phytosanitary Measures).

GRANTS PROGRAM

As part of the overall grants program sponsored by the Pallet Phytosanitary Project, two projects have been funded to meet specific needs of the WPM

industry. The first of these projects is outlined below:

Title: Heat Sterilization Times of Six Sizes of Five Hardwood Species
Organization: Michigan Technological University
Project Leaders: John Forsman
John Erickson

There are a number of factors that influence heating time, particularly within the context of maintaining a core temperature of 133 degrees Fahrenheit for 30 minutes in conformance with the Guidelines for Regulating Wood Packaging Material in International Trade. These factors include: wood species, specific gravity, moisture content, cross-sectional dimensions, initial wood temperature, heating temperature, and heating medium. With this number of variables involved, it is often difficult to estimate the necessary heating time to achieve the conformance standard.

This study will use analytical methods to calculate heating time estimates. The specific objectives are:

- Determine the extent to which the hardwood species commonly used in pallets affect the time required to heat the center of pallet component boards to 133°F Fahrenheit at a heating temperature of 160°F.
- Determine the effect of common pallet sizes on heating time.
- Determine if an available two-dimensional solution to the heat conduction equation is able to reliably estimate heating times in steam.
- Determine how much heating time is extended when the heating medium is not saturated steam.

Five hardwood species will be tested in this research and include: red oak,

sugar maple, red maple, basswood, and aspen. Additionally, six piece sizes will be tested, including: 1, 1-1/2, and 2 inches thick (with all pieces 6 inches wide and 8 feet long), plus 3x3 inch, 4x4 inch, and 6x6 inch pieces. Two heating mediums (both at 160°F dry bulb temperature) will be tested: saturated steam (steam spray-on with only a 1-2°F wet bulb depression) and heating with a wet bulb depression of 10°F.

The product of this research will be information that will allow heat treaters to estimate the time required to treat the center of various hardwood species and configurations to the required kill temperature for insect control.

STATE LEVEL GRANT PROGRAM

Twenty-three of the thirty-two states in the eastern hardwood region participated in the state level grant program, sponsored as part of the Pallet Phytosanitary Project. Each state contracted, at a minimum, to attend a Briefing Session and to sponsor at least two informational meetings for local businesses, organizations, and interested individuals. Each newsletter issue summarizes the results of one or more state cooperators who have completed their projects.

Iowa

The phytosanitary project partners in Iowa were the Iowa Wood Industries Association and the Iowa Department of Natural Resources – Forestry Division. Two informational sessions were conducted, one in northeast Iowa and one in southeast Iowa.

The first meeting had 32 attendees, comprised of 65 percent pallet manufacturers, 25 percent sawmills, and 10 percent loggers, while the second meeting was attended by 34 individuals, representing pallet manufacturers (60 percent), sawmills (35 percent), and loggers (5 percent).

Regular updates on the phytosanitary measures continue to be included in the Iowa Wood Industries Association Newsletter, *Iowa Wood Splinters*.

ONGOING REQUEST FOR INFORMATION

Those receiving this newsletter represent a rich source of information regarding the issues, problems, and successes that the wood packaging industry is experiencing. Likewise, you are no doubt providing information, solutions, and support to your clients. The Project Team would like to continue compiling these issues and any solution you have developed and share them with your colleagues and the industry through this newsletter. We would much appreciate you forwarding your experiences to the Project Manager (via email at curth@mail.wvnet.edu or by phone at (304) 282-5417) so that we can compile the information and continue to share it in future newsletters.

HEAT STERILIZATION PUBLICATION

The Pallet Phytosanitary Project recently published a Technical Paper authored by Joseph Denig and Brian Bond, entitled “Heat Sterilization of Hardwood Pallets and Pallet Material”. Copies of the publication are available by contacting the Project Manager at (304) 282-5417 or via email at curth@mail.wvnet.edu.

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.
