



# SAVINO DEL BENE U.S.A. INC.

INTERNATIONAL FREIGHT FORWARDERS  
CUSTOMS HOUSE BROKER

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## **\*\* SDB CUSTOMER NOTICE \*\***

Date: July 28, 2005

Subject: **WPM REGULATIONS IN EFFECT AS OF SEPTEMBER 16, 2005**

Strict enforcement of APHIS regulations for WOOD PACKAGING MATERIALS (**WPM**) will begin effective with shipments imported into the USA on and after September 16, 2005.

Wood packing material not in compliance with the WPM requirements must be re-exported according to inspectors determination.

### Exemptions:

WPM made entirely of manufactured wood material (e.g. particle board, plywood, oriented strand board) and wine and whiskey barrels, or WPM made entirely of thin pieces of wood with 6mm thickness or less) is exempted from the treatment and marking requirements (7 CFR 319.40-3). WPM made of Canadian origin wood is also exempted from the treatment and marking requirements. Since determining wood origin will be very difficult and Canada is implementing ISPM# 15 requirements, WPM arriving from Canada will be allowed to enter the US without the IPPC mark BUT will be inspected for pest and treated in accordance with Inspectors recommendations.

### **WHAT ARE THE REQUIREMENTS?**

The regulation requires all WPM to be treated and marked per ISPM#15 which requires the wood packing material to be heat treated OR treated with T404 (methyl bromide or kiln dried) AND to be marked in accordance to ISPM#15 marking requirements.

A copy of the requirements, regulations, and information on vendors can be obtained at <http://www.aphis.usda.gov/ppq/wpm/> or by contacting your local Savino Del Bene office.

### **HOW DOES THIS AFFECT MY BUSINESS?**

Importing cargo not in compliance with the regulations will have to be re-exported and incur additional inspection and ocean freight charges for its voyage/ flight back to origin country.

### **WHAT ARE MY RESPONSIBILITIES?**

Importers must inform all of their overseas suppliers that ONLY compliant wood packing material should be utilized for shipments destined to any USA port. You should refer your suppliers to the APHIS website and also note that these requirements while newly implemented in the USA have been in effect for exports to many countries including China, Australia, and EU. Suppliers should be able to obtain compliant materials through their current pallet supplier or by contacting their National Lumber Association for a list of providers .

Attached are reference documents which include the ruling and list of countries implemented.



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For further information on Wood Packing Materials requirements contact your local SDB office, see the following website <http://www.aphis.usda.gov/ppq/wpm/>  
Or contact Mickey Diaz at [mdiaz@nyc.sdbusa.com](mailto:mdiaz@nyc.sdbusa.com)

*Savino Del Bene is an International Freight Forwarder and Customs House Broker providing Air, Ocean, and Ground Freight Forwarding Services, Customs Brokerage, Warehousing and Distribution Solutions since the early 1900's. Savino Del Bene USA is C-TPAT Certified and an active ACE Participant.*

Regards,  
Mickey Diaz  
Vice President Operations USA  
**SDB USA INC.**  
**As Strong as the Biggest**  
**As Flexible as the Smallest!**

*Savino Customer Notice articles are compiled from a number of public sources that, to the best of Savino's knowledge, are true and correct. It is our intent to present only accurate information. However, in the event any information contained herein is erroneous, Savino Del Bene USA, Inc. accepts no liability or responsibility.*



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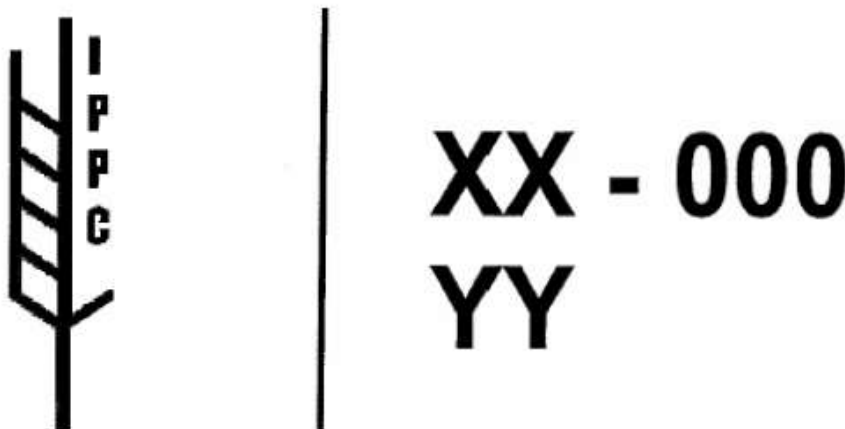
## Implementation of the Wood Packaging Material (WPM) Regulation

### Background:

APHIS revised the import regulations for WPM to be consistent with the International Plant Protection Convention standard ISPM #15. The regulation restricts the importation of many types of wooden packaging materials such as pallets, crates, boxes, and dunnage. The revised WPM regulation is effective **September 16, 2005**. The regulation requires WPM in use in international trade to be treated. The approved treatments are 1) heat treatment to a minimum wood core temperature of 56°C for a minimum of 30 minutes or 2) fumigation with methyl bromide. The term "solid wood packing material" used in previous USDA import regulations has been changed to "wood packaging material" to be consistent with ISPM #15.

WPM must be marked with the IPPC logo and the two letter ISO code for the country that treated the WPM. The marking must also include the unique number assigned by the national plant protection organization to the company responsible for ensuring the WPM was properly treated, and either the abbreviation HT (heat treatment) or MB (methyl bromide). Paper certification (treatment certificates) will not be required.

Example of the WPM mark:



**XX** represents the ISO country code.

**000** represents the unique number assigned by the national plant protection organization.

**YY** represents either HT for heat treatment or MB for methyl bromide fumigation.

### Exemptions:

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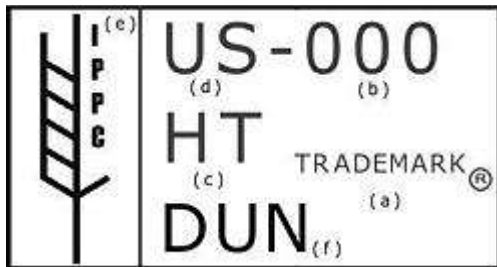
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## ISPM 15 Solid Wood Packaging Update (May 11, 2005)

### Dunnage Marking Requirements

The American Lumber Standards Committee (ALSC) has recently introduced an ISPM 15 HT mark for dunnage (see below). Dunnage is defined as wood packaging used to secure or support a commodity, but which does not remain associated with the commodity.

Each piece of dunnage shall be marked with the ISPM 15 mark specifically designated for dunnage. In the event you purchase lumber to be cut up for dunnage, that lumber should be marked every two feet so at least one such mark will be on all dunnage components.



- Trademark - the identifying symbol, logo, or name of the accredited agency
- Facility Identification - product manufacturer name, brand or assigned facility number
- Heat Treated mark
- Country Code - the two letter ISO country abbreviation
- Approved International symbol for compliant wood packaging material
- Indication of use for dunnage (may be spelled out fully)

### **Countries with implementation changes since last update (March 16, 2005):**

Based on their World Trade Organization (WTO) notifications, the following countries are now or soon will be enforcing ISPM 15:

#### **Enforcement Date**

Ecuador Apr 26,2004  
Panama Feb 17,2005  
Peru Mar 1,2005  
Argentina Jun 1,2005

#### **South Korea**

Korea has revised its requirements for softwood packaging. Formerly they would only accept HT for softwood; they will now accept MB fumigation provided they are treated using a 24-hour schedule.

#### **Tanzania**

Tanzania's Ministry of Agriculture and Food Security has published its regulation for import and export wood packaging materials. There was no mention about the implementation date.

### **Summary information for countries that have begun implementation or announced plans to implement ISPM-15:**

**Argentina:** June 1,2005



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**Australia:** September 1, 2004 (Variations to ISPM-15: Bark-free + packing declaration for ISPM-15 compliant WPM, 21-day rule does not apply)

**Brazil:** September 16, 2005 (Note: September 2005 is Brazil's announced date, however it is considering harmonizing implementation with Argentina, Chile, Paraguay and Uruguay for June 1, 2005.)

**Canada:** September 16, 2005 (Note: Phase-in implementation since January 1, 2004; exemption granted to U.S.)

**Chile:** June 1, 2005

**China:** January 1, 2006 (Variation: MB fumigation of softwood packaging must be at least 24-hours depending on wood temperature)

**Colombia:** September 16, 2005

**Costa Rica:** January 1, 2005

**Ecuador:** April 26, 2004

**European Union:** March 1, 2005 (See special conditions below)

**Guatemala:** September 16, 2005

**India:** November 1, 2004 (Variation: Phytosanitary certificate required only for WPM not ISPM-15 compliant)

**Mexico:** September 16, 2005 (Note: Phase-in implementation since January 1, 2004)

**New Zealand:** April 16, 2003

**Nigeria:** September 30, 2004

**Panama:** February 17, 2005

**Peru:** March 1, 2005

**Philippines:** June 1, 2005 (Note: Partial enforcement starting January 1, 2005, WPM must be treated, but marking not required)

**South Africa:** January 1, 2005

**South Korea:** June 1, 2005 (Variation: HT only for softwood packaging)

**Switzerland:** March 1, 2005

**Turkey:** January 1, 2006 (Variation: Debarked WPM)

**U.S.:** September 16, 2005 (Note: Phase-in implementation since January 1, 2004; exemption granted to Canada)

**European Union (EU)**



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The European Union began enforcement of ISPM-15 March 1, 2005. The E.U. deferred for a year their debarking and bark-free specifications (see dunnage exception below), but claim they will present technical justification for the additional requirements and begin enforcement March 2006. The E.U. has some variations that need to be clarified:

**Marking:** Until December 31, 2007 the E.U. will accept all previously recognized marks for heat treatment (HT, "no-bug" logo, and ISPM 15 mark). For fumigation, however, they will only accept the ISPM 15 mark; if you have wood packaging with the previous fumigation mark you must re-treat and re-mark.

**Dunnage:** If dunnage is treated and marked it need not be bark-free. If dunnage is not marked it must be bark-free and devoid of pests and signs of live pests.

If the E.U. implements debark and bark-free requirements in March 2006 as they plan, dunnage must comply with the same treatment, marking and debarking as all other wood packaging.

## ISPM-15 Requirements

Compliance with ISPM-15 for wood packaging materials allows for two treatment options:

**Heat Treatment (HT):** Wood packaging material should be heated in a schedule that achieves a minimum core temperature of 56°C for a minimum of 30 minutes. The American Lumber Standards Committee administers the U.S. certification program for heat treatment.

**Methyl Bromide (MB) Fumigation:** The wood packaging material should be fumigated with methyl bromide. NWPCA has been tasked by the U.S. Animal and Plant Health Inspection Service to administer the fumigation program.

**NOTE:** ISPM 15 requirements apply to all species of coniferous (softwood) and non-coniferous (hardwood) packaging materials.