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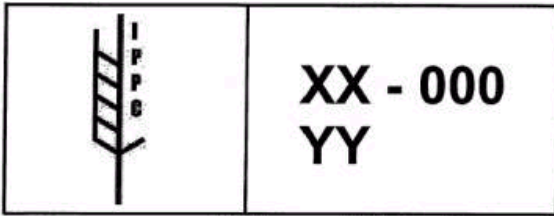
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INTERNATIONAL WOOD PACKAGING UPDATE

August 1, 2006

Major trading partners of the U.S. have adopted the **IPPC-ISPM 15** (Guidelines for regulating wood packaging material in international trade) regulations. Wood Packaging Materials (WPM) includes, but is not limited to, pallets, dunnage, crating, packing blocks, drums, cases, load boards, pallet collars and skids. Certified WPM must bear the mark shown below:



ISPM 15 Requirements

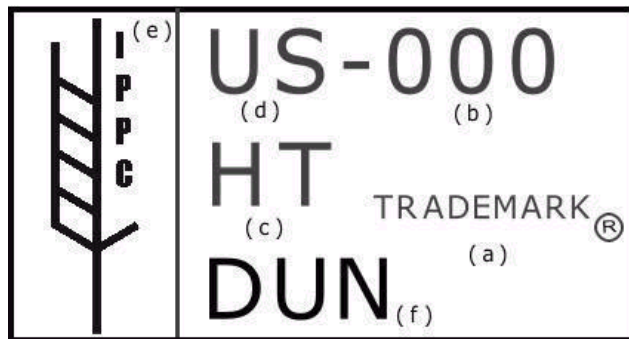
Compliance with ISPM 15 for wood packaging materials allows for two treatment options. ISPM 15 requirements apply to all species of coniferous (softwood) and nonconiferous (hardwood) wood packaging materials (WPM).

- 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.

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.

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The IPPC treaty dealing with ISPM 15 has been signed by 134 nations. Listed below are the countries that have begun the implementation process.

United States, Canada and Mexico (North American Plant Protection Organization-NAPPO)

US, Mexico and Canada have *revised their implementation* of ISPM-15 with a 3-phase approach:

- Phase 1** (September 16, 2005 - January 31, 2006) - No action will be taken but notification will be issued to importers that are not using ISPM 15-compliant wood packaging.
- Phase 2** (February 1, 2006 - July 3, 2006) - Rejection of non-compliant wood packaging will be enforced. Quarantine expenses will be billed to the importer.
- Phase 3** (starting July 4, 2006) - Full enforcement, all imported wood packaging must be ISPM 15-compliant.

Note: Although US, Canada and Mexico have revised their implementation of ISPM-15, PRL recommends that all WPM shipped from the US into Mexico be compliant from now on.

United States

Animal and Plant Health Inspection Service (APHIS) just released its final rule "Importation of wood packaging material." Starting February 1, 2006, all imported WPM except those coming from Canada must be treated and marked according to ISPM 15. Non-compliant WPM will be re-exported; treatment at the port of entry will not be an option. In some cases compliant WPM with signs of pests may be fumigated at the port. APHIS will use risk management techniques and statistical sampling for inspection targets. Shipment from countries with high levels of interception will face more inspection whereas, highly compliant importers will be subject to fewer inspection. (Note: The United States regulations control imports into America. They do not have authority over export wood packaging. For exports, be sure to be guided by the rules of the destination country.)

Wood packaging from Canada going to the US remains exempt from treatment and marking if Canadian lumber is used. However, an import declaration (Wood packaging in this shipment is derived from trees harvested in Canada or US) is required. A "Made in Canada" stamp is not acceptable.

Canadian pallets made from imported lumber: APHIS tells us that a Canadian pallet made from imported lumber must be treated by ISPM-15 guidelines with treatment and marking. They are no longer exempt.

Canada

The Canadian Food Inspection Agency (CFIA) has set February 1, 2006, as its target date for strict enforcement of ISPM 15. Non-compliant wood packaging will be rejected and the cost involved is the responsibility of the shipper. All countries must comply and only the U.S. has been granted an exemption. Canada is a member of NAPPO and a participant in the 3-phase implementation.

Mexico

Secretaria de Medio Ambiente y Recursos Naturales (SEMARNAT) released its final rule on import and export WPM. The rule states that imported WPM must be ISPM 15-compliant starting February 1, 2006. Mexico is a member of NAPPO and is implementing the 3-phase approach.

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Page 3**Argentina**

Argentina began enforcing ISPM 15 on January 1, 2006.

Australia

The Australian Quarantine Inspection Service (AQIS) has announced its amended import requirements for solid wood packaging; those requirements took effect September 1, 2004. In January 1, 2006, they added WPM in break bulk & air cargo.

ISPM 15-compliant wood packaging is acceptable for shipment to Australia under the following conditions:

- Heat treated at 56°C for at least 30 min OR fumigated with methyl bromide and marked with the ISPM 15 stamp
- Bark-free
- Include a packing declaration (Note: declaration for ISPM 15-compliant solid wood packaging must be submitted per consignment; an annual declaration is not acceptable)

The following are no longer needed for wood packaging to be compliant under ISPM 15 in Australia:

- Treatment certificate (provided that the packing declaration indicates ISPM-15 compliance)
- Satisfy the 21-day requirement (no more time limit between treatment and packing)

If wood packaging is not marked as ISPM 15-compliant:

- The 21-day rule for non-permanent treatment methods (e.g. heat sterilization, fumigation) does apply, and
- A treatment certificate AND packing declaration are required.

Bolivia

Bolivia began enforcing ISPM 15 on July 23, 2005.

Brazil

Brazil began enforcing ISPM 15 on June 1, 2005.

Bulgaria

Bulgaria began enforcing ISPM 15 on January 24, 2006.

Chile

Chile began enforcing on June 1, 2005.

China

New regulation took effect last January 1, 2006 on arrival basis (not shipment date) of WPM. Although not a requirement, it is highly recommended to make a statement in Chinese language on the shipping invoice "WPM are ISPM 15-compliant," "WPM are exempt from ISPM 15" or "There is no WPM in this shipment."

Colombia

Colombia changed their implementation date from December 31, 2004 to September 16, 2005.

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Page 4**Costa Rica**

Costa Rica's Ministry of Agriculture and Livestock has notified WTO of its intent to adopt ISPM 15 in their regulations for imported WPM. Implementation date will be March 19, 2006.

Dominican Republic

Dominican Republic began enforcing ISPM 15 on July 1, 2006.

Ecuador

Ecuador began enforcing ISPM 15 on September 20, 2005. This is a date change from previously reported.

Egypt

Egypt began enforcing ISPM 15 on October 1, 2005.

European Union

The European Union began enforcement of ISPM 15 on March 1, 2005. The European Commission has voted to again suspend their debarking requirement until January 1, 2009. They have stated they will review the IPPC progress on the technical justification for debarking in September 2007.

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 January 2009 as they plan, dunnage must comply with the same treatment, marking and debarking as all other wood packaging.

Guatemala

Guatemala began enforcing ISPM 15 on September 16, 2005.

Honduras

Honduras began enforcing ISPM 15 on February 25, 2006.

India

India began enforcing ISPM 15 on November 1, 2004. They also made it clear that a phytosanitary certificate is not required as long as the wood packaging is ISPM 15 treated and marked.

Indonesia

No published date of implementation (based on their draft regulation, WPM must be debarked and a packing declaration will be required).



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Japan

Tentative implementation date is January 2007.

Jordan

Jordan began enforcing ISPM 15 on November 17, 2005.

Kenya

Kenya began enforcing ISPM 15 on January 2006.

Lebanon

Lebanon began enforcing ISPM 15 on March 26, 2006.

New Zealand

New Zealand has fully implemented and is enforcing ISPM 15.

Nicaragua

No published date of implementation.

Nigeria

Nigeria Plant Quarantine Service is now enforcing their import requirements for imported WPM. Nigeria will accept the ISPM 15 mark in lieu of the phytosanitary certificate as stated in their regulation which took effect September 30, 2004.

Oman

Ecuador will begin enforcing ISPM 15 in December 2006.

Panama

Panama has not yet begun enforcing ISPM 15.

Paraguay

Paraguay began enforcing ISPM 15 on June 28, 2005.

Peru

Peru began enforcing ISPM 15 on March 1, 2005.

Philippines

Philippines began full implementation of ISPM 15 on June 1, 2005.

Seychelles (Off East Coast of Africa)

Seychelles began enforcing ISPM 15 on March 1, 2006.



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South Africa

South Africa began enforcing ISPM 15 on January 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. Enforcement date was June 1, 2005. Methyl Bromide fumigation for softwood packaging is now allowed, but must use the 24-hour treatment schedule.

Switzerland

Switzerland began enforcing of ISPM 15 on March 1, 2005.

Syria

Syria began enforcing ISPM 15 on April 1, 2006.

Taiwan

Taiwan's new regulation only applies to lumber and other wood products and does not include wood packaging.

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.

Trinidad & Tobago

Trinidad and Tobago began enforcing ISPM 15 on September 15, 2005.

Turkey

Turkey has changed its implementation date from January 1, 2005 to January 1, 2006. Similar to the EU, Turkey's import requirements for regulated WPM requires debarking.

Ukraine

Ukraine began enforcing ISPM 15 on October 1, 2005.

Venezuela

Venezuela began enforcing ISPM 15 on June 1, 2005.

Vietnam

Vietnam began enforcing ISPM 15 on June 5, 2005.

As you can see the International Export Regulations have been in flux for some time. If your company has concerns about wood packaging regulations for a specific shipping destination, **PLEASE give REMMEY "The Pallet Company" a call at 1-800-PALLET-5 (800-725-5385)**. REMMEY has been in the wood packaging business for more than 50 years; it is our job to provide our customers with a cost effective, compliant wood packaging that will deliver your products safely to your customer.

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