

WOOD PACKAGING MATERIAL QUESTIONS AND ANSWERS

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Since the inception of the WPM program several general scenarios have arisen concerning the use of the ISPM 15 markings on specific WPM products. Examples of the scenarios are summarized below along with the present marking practices.

1. Scenario: Units of export lumber are packaged with crossouts (runners) attached under the units to facilitate movement of the units by a forklift. Can crossouts (runners) under a package of export lumber be ISPM 15 Marked?

Present Practice: Some importing countries are requiring crossouts under units of lumber to be labeled as ISPM 15 compliant, therefore the crossouts can be labeled with the ISPM 15 HT mark or the ISPM 15 HT Dunnage mark.

2. Scenario: A similar scenario to scenario 1 occurs when wood skids are attached to the bases of drink machines, washing machines and dryers, etc. Can the wooden skids be marked under ISPM 15?

Present Practice: These single pieces of wood are considered WPM and can be labeled with the ISPM 15 mark.

3. Scenario: Some WPM facilities produce what is referred to as a “kit” that is shipped unassembled to the end user of the WPM and the end user assembles the “kit” for use with its product. In many cases the product being shipped is such that the “kit” must be assembled around the product. Can a WPM “kit” be marked under ISPM 15?

Present Practice: The “kit” is a WPM product that is intended for a specific use and ISPM 15 marks can be used. When shipped the components of the “kit” shall be banded together, shrink wrapped or similarly packaged to protect the integrity of the disassembled WPM product. In many cases the agency involved is able to follow-up with pieces that will be opposite each other and facing outward in the final assembly are required to be marked with the ISPM 15 mark.

4. Scenario: Some companies purchase ISPM 15 marked WPM (pallets, crates, etc.) to be used in the shipping of its product. In some cases the product is loaded on to the ISPM 15 marked WPM and secured by adding additional pieces of wood to the original ISPM 15 WPM product. How can this scenario be handled under ISPM 15?

Present Practice: The added pieces of wood used to secure the product can be labeled using ISPM 15 markings by the companies adding pieces to previous labeled ISPM 15 WPM product. Labeling in this fashion makes these companies responsible for the added pieces of wood and the original WPM manufacturer responsible for the original ISPM 15 marked WPM.

5. Scenario: Facility C purchases an ISPM 15 marked box top from facility A and the ISPM 15 marked box bottom is purchased from facility B. Facility C then constructs the sides and assembles the box. How can this scenario be handled under ISPM 15?

Present Practice: Facility C can construct the sides and label the individual sides ISPM 15 then assemble the sides using facility A and facility B parts into an ISPM 15 compliant box. In this case the ISPM 15 marks of Facility A and B remain on the finished WPM product.

6. Scenario: In some cases the WPM consist of an inner support skeleton of wood that is covered by cardboard, plywood or some similar material that is not solid wood. In these scenarios no solid wood can be seen on the outside of the WPM. How can the WPM product be marked under ISPM 15?

Present Practice: In such cases the ISPM 15 mark can be applied to the outside of the WPM product. In addition the ISPM 15 mark should be applied to the skeleton wood component(s) for evidence of compliance to ISPM 15 should the WPM ever be disassembled and inspected by the import country.

7. Scenario: Can WPM be marked with the ISPM 15 Dunnage mark?

Present Practice: The use of the ISPM 15 Dunnage mark is intended to be used on dunnage type products. The agency should instruct the WPM facility not to apply the dunnage mark to WPM products such as pallets, crates, boxes, etc. If the WPM facility accidentally labels WPM with the dunnage mark it may not be necessary to re-label the WPM with the ISPM 15 mark as both marks show compliance to ISPM 15.

8. Scenario: Some WPM producers manufacture tops, sides and /or bottoms of crates, barrels, spools, etc. and ship for certain manufacturers. The manufacturers mix and match these components to assemble WPM to fit the product being transported. An example would be a manufacturer that needs a certain size box where the top and bottom of the box are always the same size but depending on the product shipped the sides of the box may need to be various heights making it impractical for the WPM facility to produce the fully assembled box. Can component parts such as these be labeled with the ISPM 15 marks?

Present Practice: The WPM in these cases is intended for a special use and the ISPM 15 mark can be applied to the components provided they are shipped in corresponding numbers. In many cases the agency involved is able to follow-up with the end user to monitor the process.

9. Scenario: Some large WPM requires the use of large timbers or skids. These large size pieces are apparently difficult to obtain with HT markings but may be available with fumigation markings that indicate ISPM 15 compliance. Can these fumigated pieces be incorporated into WPM that is to be labeled ISPM 15 HT complaint?

Present Practice: Provided each piece that has been fumigated is clearly marked as ISPM 15 compliant by an agency recognized under the APHIS fumigation program the fumigated piece(s) may be incorporated into an ISPM 15 HT labeled WPM product.

Given a multitude of variations under the above scenarios, the marking of ISPM 15 WPM may require further investigation, both initially and ongoing, by the agency to assure proper marking of ISPM 15 WPM. Each agency shall take all appropriate measures needed to ensure proper use of its marks.