March 29, 2012 Bulletin » Update: Requirements for WPM Moving Between Canada and the US



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Timelines for the implementation of International Standard for Phytosanitary Measures (ISPM) No. 15 for wood packaging material (WPM) shipped between Canada and the US have not been yet been finalized, but, according to the Canadian Trucking Alliance, full enforcement is not anticipated prior to January 2014; in the meantime, however, carriers should be aware of specific US requirements for unmarked WPM.

Canada and the US have agreed to phase-out the current bilateral exemption from ISPM No. 15 for WPM of Canadian or US origin. The definition of "wood packaging" is any piece of non-manufactured wood used to brace, support, protect or secure a consignment or cargo. Wood packaging products include dunnage, crating, wood boxes, load boards, and pallets.

Until both countries formally eliminate the exemption, the US will continue to permit unmarked WPM to cross the border subject to the following requirements:

- WPM must be manufactured using wood products derived from trees harvested in Canada or the US.
- The shipper must provide a declaration attesting to the origin of the WPM, which must be clearly stated on all shipping documents.
- The WPM must be free of pests.

WPM not of Canadian or US origin must be in full compliance with ISPM No. 15 requirements, which came into effect in 2005 in the US and 2006 in Canada, meaning that the WPM must bear a recognized certification mark indicating that it has been heat treated or fumigated in accordance with the Standard (see below).

US Customs and Border Protection (CBP) Blaine has indicated that if a question arises about the origin of unmarked WPM during post-primary inspection, the wood packaging material may, depending on the circumstances and the nature of the shipment, take on the country of origin where the merchandise was manufactured. For example, if merchandise made in China is shipped on a combination of pallets that originate in China (country code "CN") as well as unmarked pallets declared to be of Canadian or US origin, unless the shipper or carrier can provide evidence to the contrary, the assumption will be that the unmarked pallets are also of Chinese origin.

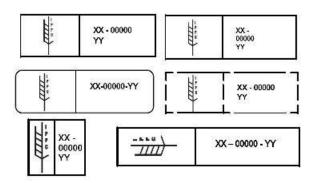
More generally, if a shipment contains a mixture of marked and unmarked WPM, the shipper's declaration will be brought into question. In cases like these, CBP Blaine will provide the option to have the shipment referred for "manipulation" (i.e., replacement of non-compliant WPM) at the Blaine Centralized Examination Station (CES) or to turn around and return to Canada.

As a general guideline, shippers and carriers should ensure that any given shipment in a conveyance uses marked pallets as per ISPM No. 15 *or*unmarked pallets as per the requirements listed above, but not a combination of the two. This general guideline applies in the truck-load and less-than-truckload (LTL) environment. For example, a conveyance carrying freight from several shippers should not encounter issues when crossing the border as long as the freight for one LTL shipment in question is transported exclusively on unmarked pallets accompanied by a shipper's declaration, even if other LTL shipments in the conveyance are transported on marked pallets. However, if the LTL shipment in question is transported on a combination of marked and unmarked pallets, the shipper's declaration for that particular shipment will be brought into question.

ISPM No. 15 WPM Certification Mark

The examples of the recognized WPM certification mark shown below certify that wood packaging, loose wood dunnage material, or any other non-processed wooden articles have been subjected to approved treatment measures. The mark consists of the following required components:

- 1. **IPPC Recognized Symbol** –the design of the symbol must closely resemble that of the examples below and be placed to the left side of all other components.
- Country Code –must be the International Organization for Standards (ISO) two-letter country code (shown as XX in the examples) and must be separated by a hyphen from the producer/treatment provider code. Canada's country code is CA and should not be confused with CN, which is China's country code. The country code for the United States is US. Please <u>click here</u> for a complete list of ISO Country Codes.
- 3. **Producer/Treatment Provider Code** –this is a unique code assigned to the producer of the wood packaging material or treatment provider that applies the marks (shown as **00000** in the examples).
- 4. **Treatment Code** –the abbreviation for the specific treatment used (shown as **YY** in the examples). **HT** is the code for materials that are *heat treated*. **MB** is the code for materials that have been treated with *methyl bromide*.



Additional background information & resources:

- USDA-APHIS information about <u>ISPM No. 15</u>
- Canadian Food Inspection Agency (CFIA):
 - <u>Notice and background</u> about the implementation of ISPM No. 15 (2009) for Wood Packaging Moving Between Canada and the US
 - <u>Q&A</u> about the implementation of ISPM No. 15 between Canada and the US
- International Plant Protection Convention (IPPC) <u>ISPM No. 15</u>
- Northeastern Lumber Manufacturers Association <u>Background about ISPM No. 15</u>

Reminder: A discussion of wood packaging materials is on the agenda of the upcoming US CBP meeting for cross-border carriers at the new Peace Arch Border facility on **Tuesday, April 3, 2012**. For details and registration information, see the March 22, 2012, *Bulletin* article, "<u>US CBP Hosts Carrier & Broker Meetings in Blaine</u>."