

The UK Wood Packaging Material Marking Programme

Requirements for regulating wood packaging material in
international trade ISPM 15

Addendum – Temporary Easement ISPM 15 Repairs

March 2021

UKWPMMP Addendum EMP16102020

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UKWPMMP Brexit Easement Flow Chart using ISPM 15 treated timber components for repairs.

1.0 Addendum – Brexit Easement for ISPM 15 repairs.

The use of heat-treated wood for repair is more energy-efficient and saves kiln capacity over heat-treating a whole repaired pallet. We expect that this easement will encourage more repairs and that these will help towards Government targets for REUSE.

Under the existing scheme, ISPM 15-compliant wood packaging material must be subject to re-treatment and all previous ISPM 15 marks must be removed or obliterated and the product re-marked by a person authorised under the UKWPMMP. The easement avoids the need for total re-treatment of pallets after repair, subject to the member adhering to the terms and conditions set down in this Addendum – Brexit Easement, of the UK Wood Packaging Material Marking Programme (UKWPMMP) revised edition 2019 and subsequent revisions as applicable.

The easement is fully compliant with the requirements of ISPM 15 and the use of heat-treated wood for repair offers the same assurance about biosecurity as the heat-treatment of untreated pallets.

In order to maintain chain of custody and accountability pallets will continue to be re-marked after they are repaired. Unauthorised application of an ISPM 15 mark may be treated a criminal offence under the:

- Official Controls (Plant Health and Genetically Modified Organisms) (England) Regulations 2019
- The Plant Health (Official Controls and Miscellaneous Provisions) (Miscellaneous Amendments) (Scotland) Regulations 2020
- The Official Controls (Plant Health and Genetically Modified Organisms) (Wales) Regulations 2020
- The Plant Health (Official Controls and Miscellaneous Provisions) Regulations (Northern Ireland) 2019

Time Scale – This easement will be allowable for a period from date of emailed notification to the UKWPMMP secretariat that the UKWPMMP member wishes to introduce the exemption to their operations until the 31st December 2021.

2.0 Scope

This exemption covers repairs to all ISPM 15 wooden packaging materials¹.

3.0 Application Process

Existing UKWPMMP members must email their intention to implement this easement by email to the UKWPMMP Secretary who will then update the FC and the relevant Auditor of their intentions. There is no additional fee to members.

By emailing their intention the UKWPMMP member is agreeing to adhere to all sections of the following process.

4.0 Process

Please refer to appendix 1

4.1 Ordering ISPM 15 Components from third party

All purchase orders raised with an ISPM 15 accredited supplier must clearly state the components are to be supplied heat treated i.e. meeting the ISPM 15 56 degrees at core for 30 minutes criteria. Unless the components are of exempt materials such as composite blocks. These PO's must be available for the auditor to review.

4.2 ISPM 15 Components in house

If the company wishes to heat treat components using their own accredited chambers they must record the dates and quantities of each batch treated. This information must be available to the Auditor.

4.3 Stock

The exemption requires that stock records are kept clearly showing materials coming into stock and then being updated daily with what components have been used on that days repair. Heat-treated stock must be segregated from untreated stock and stock records kept accordingly for at least 6 months. This information must be available to the Auditor.

4.4 Repair Process

When the pallets arrive onsite, they will be inspected and repaired as per the current procedures. The difference being that the repair can be done using compliant components. The total pallet does not then need to be re treated.

4.5 Marking

Once the pallet has been repaired using the compliant components it must then re marked as current procedures i.e. the original markings must be obliterated / removed and the repair sites ISPM 15 number applied on two opposite faces.

As with the UKWPMMP the powers of inspection will remain the same;

To check whether marked WPM is being manufactured in compliance with the Programme, plant health inspectors have authority to enter, without a warrant, any premises they believe to be used for this purpose (other than premises used wholly as a private dwelling). An inspector may observe the manufacturing process, examine or test any equipment, examine or take samples of wood packaging material, inspect and make copies of documents relating to the manufacture of wood packaging material and take photographs as necessary. An inspector may remove, or ask for the removal of, any ISPM 15 marks, which he/she believes have been applied without a certificate or which do not otherwise meet the requirements of the Programme (e.g. where they are illegible). Where an inspector has grounds for suspecting that a person has applied, or intends to apply a mark to wood packaging material without a certificate, they may confiscate any equipment they believe to be capable of applying an ISPM 15 mark. Any person from whom such equipment has been seized will have one month in which to lodge an appeal to the Competent Authority before the equipment is destroyed. Where an appeal is lodged, the Competent Authority shall either return the equipment if they are satisfied that there are good grounds for doing so, or shall apply to the Court for an order for its destruction.

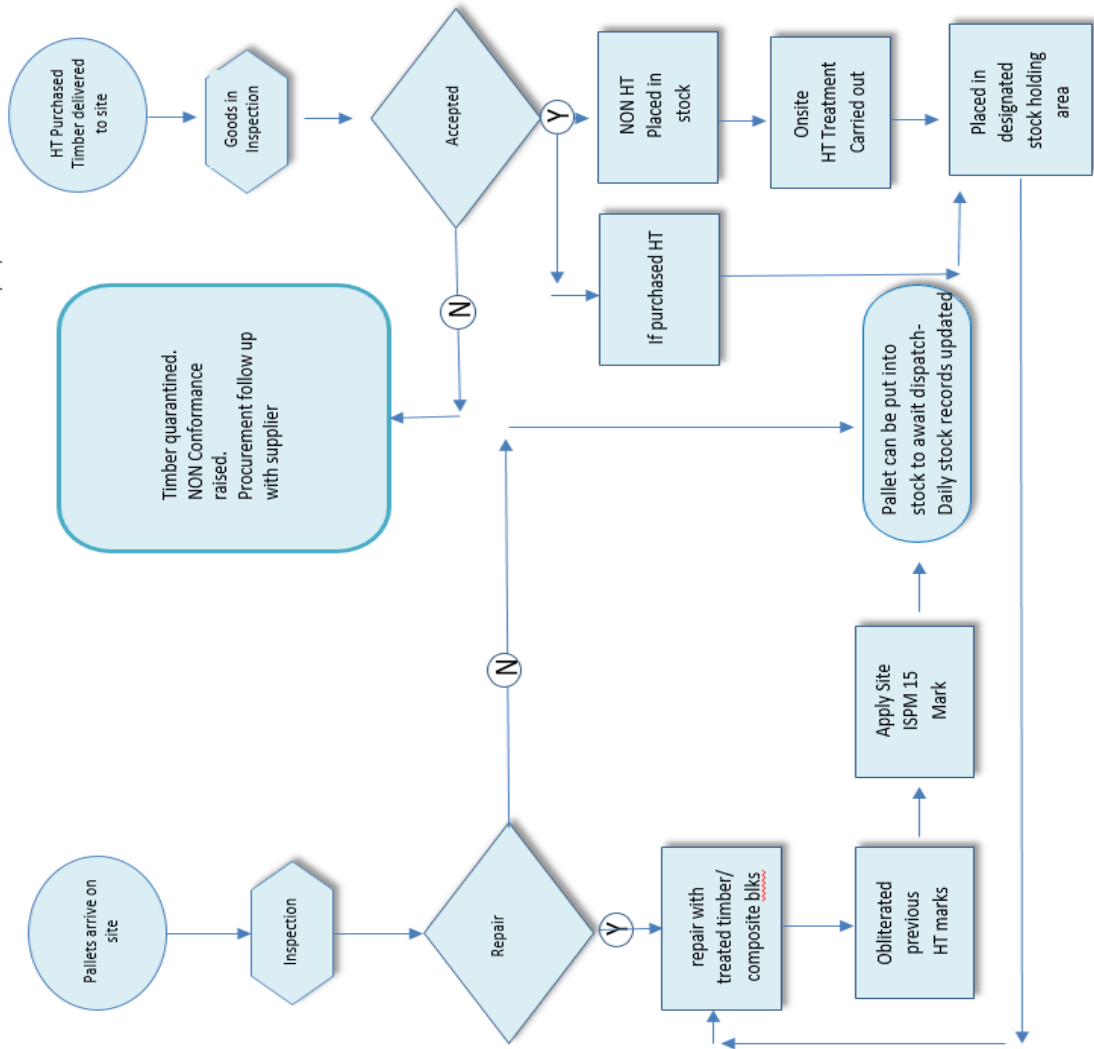
Ref FCPH004/FC(JW)/WWW/DEC18

Appendix 1

The UK Wood Packaging Material Marking Programme

UKWPMMP - Brexit Exemption for ISPM 15 repairs.

Refer to 4.1,4.2,4.3



Refer to 4.4