## Wooden Pallet Regulations Delayed

by Miles Free, Director of Technology Services

Do you produce parts for shipment overseas, say to Europe? Do you now or are you thinking about importing parts from overseas? Are you up to speed on the international phytosanitary requirements as they might apply to your shipments?

"Phytosanitary" means "plant-safe," or free of live biological organisms that might become an infestation of a harmful, non-native species. If you have heard of the Gypsy Moth, Japanese Beetle or Zebra Mussel, then you understand the reasoning behind these requirements.

## **IPPC Treaty Already Signed**

Implementation of the regulations requiring the treatment and identification of wooden pallets and shipping materials has been delayed. The regulations are a result of the United Nations International Plant Protection Convention (IPPC), a treaty that has been signed by 120 nations, including the United States and the European Union.

The treaty establishes methods for treatment of pallets and other wooden packaging to prevent the inadvertent introduction of the pinewood nematode, insects and other pests. Heat treatment (HT), methyl bromide fumigation (MB) and chemical pressure impregnation (CPI) treatments are among the acceptable options to assure that no vermin are contained in wooden packaging materials.

All treated materials must be marked with an IPPC symbol, a 2-digit/ISO letter country code and unique producer ID number, and the 2-digit treatment code: "HT" or "MB." CPI is considered a heat treatment and would be shown as "HT."

Manufactured wood packing materials (engineered products such as particle board and plywood) are not covered by the regulations. The

European Union has delayed the implementation of these regulations, and ratification by individual countries is delayed pending that approval.

Experts expect the EU to implement these regulations by July 2004. Until the new regulations go into effect, pallets and wooden packaging to Europe are covered by current emergency rules requiring the treatment and marking of all new and used coniferous (pine, fir, and spruce) softwood pallets. Currently, hardwood pallets are exempt from the emergency requirements.

## USDA Draft Rule On Importing Pallets

The USDA's Animal and Plant Health Inspection Service (APHIS) has published a draft rule for the importation of wooden packaging material into the United States. The comment period closed in July 2003, with target implementation estimated for April or May 2004.

Importers are to meet the conditions of ISPM 15 and the draft rule, which require that all wooden packaging material be appropriately treated and marked under the official program developed and overseen by the National Plant Protection Organization (NPPO) in the country of export.



The USDA has begun issuing notices to the NPPOs for material not appropriately treated and marked. These notices state the USDA's intention of implementation later this year and serve as tools for information dissemination. APHIS will follow its current policy for wooden packaging material until the new rule goes into effect.

For now, the Solid Wood Packing Regulations for US SWPM to the People's Republic of China have not changed. There is no new requirement or authorization at this time for the fumigation of softwood or hardwood packing materials destined for China.

## For More Information Online...

Additional information on these topics can be found at the following Web sites:

For the latest USDA APHIS update on this issue, visit: www.aphis.usda. gov/ppq/swp/

The special China rule can be found at: www.aphis.usda.gov/oa/chinaswp/chinarule.html

The IPPC Web site is: www.ippc. int/IPP/En/default.htm

A PDF of the text of the IPPC's Standard 15, "Guidelines For Regulating Wood Packaging Material In International Trade" can be read and downloaded at: www.ippc.int/servlet/Binary DownloaderServlet/16259\_ISPM\_15\_English.pdf?filename= 1055161712885\_ISPM15\_e.pdf&refID=16259

In addition, you should contact your local pallet suppliers for their input. One such supplier is Larson Pallet Company. Check its Web site at:

www.larsonpallet.com/services/ china\_and\_eu\_certifications.html