



# Phytosanitation of Wood Packaging Material Newsletter



## AHC

Appalachian Hardwood Center



WOOD EDUCATION  
AND  
RESOURCE CENTER

*A Cooperative Effort of the West Virginia University Appalachian Hardwood Center  
and the USDA Forest Service Wood Education and Resource Center*

## We Have A New Address

You will now find the most current wood packaging material (WPM) Phytosanitation news and information on the West Virginia University Appalachian Hardwood Center website <http://www.ahc.caf.wvu.edu/>. Simply follow the link located under “Current Wood Packaging Material Information” in the center of the home page.

## Methyl Bromide Update

### *Revised WPM Treatment Schedule*

A new methyl bromide (MB) treatment schedule, under consideration for some time now, was approved by the Commission on Phytosanitary Measures Standards Committee in May 2006 and enforced as of September 18, 2006. Wood Packaging Material treated under the previous schedule does not need to be retreated, remarked, or recertified. The new schedule is presented in the following table.

Temp.	Dosage g/m <sup>3</sup>	Minimum concentration (g/m <sup>3</sup> ) at:			
		2 hrs.	4 hrs.	12 hrs.	24 hrs.
21° C or above	48	36	31	28	24
16° C or above	56	42	36	32	28
10° C or above	64	48	42	36	32

The minimum temperature should not be less than **10° C** and the minimum exposure time should be **24** hours.

The National Wooden Pallet and Container Association (NWPCA) which has oversight responsibility for MB fumigation in the US, has adopted the 24 hour fumigation schedule. All NWPCA registered fumigators must be using the new schedule.

## Oversize Dunnage and Methyl Bromide Treatment

The International Forestry Quarantine Research Group (IFQRG) is supporting a change to Annex 1, “Approved measures associated with wood packaging material” of ISPM-15 to exclude dunnage (over 200 mm in all dimensions) being treated with methyl bromide under ISPM-15 requirements.

This issue has been brought forward by Australia. The Australian Quarantine and Inspection Services’ (AQIS) technical evidence indicates that the nature of gas penetration through timber suggests that it is unlikely that the methyl bromide will penetrate to the core of timber of these dimensions. AQIS believes that large pieces of dunnage may have the risk associated with them more effectively dealt with by heat treatment rather than methyl bromide fumigation.

The IFQRG document detailing this proposed measure is available at our website:

<http://www.ahc.caf.wvu.edu/>

By following the links to “Fumigation” or “News” and clicking on “Oversize Dunnage and MB Treatment” the pdf of the IFQRG document can be viewed.

## More Methyl Bromide

On August 9, 2006 the US EPA published a Federal Register notice entitled, “Methyl Bromide Tolerance Reassessment and Risk Management Decision (TRED) for Methyl Bromide, and Reregistration Eligibility Decision (RED) for Methyl Bromide’s Commodity Uses” (Federal Register Vol. 71, No 153, Pages 45546 – 45548). A Federal Register notice on September 26, 2006 extended the original comment period an additional 45 days, to November 24, 2006.

According to the above referenced document, “Although some methyl bromide uses such as fumigation of timber, wood products, and industrial equipment do not require a food residue tolerance, the Agency has included them in this reregistration decision since they are performed in similar facilities and were assessed with a similar risk assessment methodology”.

Page 32 of the EPA document is more specific, stating, “Workers who handle treated commodities after they are transported from fumigation sites have a right-to-know the potential risks related to handling of the treated commodities. This is especially a concern for workers who handle treated commodities from which the methyl bromide desorption rate is slow (e.g., walnuts and timber). The fumigator must provide these workers access to the material safety data sheet (MSDS) for the methyl bromide end-use product before workers come in contact with the treated commodities. In addition, the exterior of containers/packaging of all treated commodities must be clearly identified as having been fumigated with methyl bromide and aerated in accordance with EPA labels before leaving fumigation facilities. Fumigators must also comply with applicable Department of Transportation and any other federal, state, and local requirements for placarding vehicles leaving the fumigation sites”.

In reviewing the document, it appears that any impacts to methyl bromide fumigation of WPM is limited to two issues: a labeling requirement for the purposes of minimizing exposure to workers opening containers that have been fumigated and may still contain unsafe levels of residual methyl bromide; and, buffer zone mitigation measures. In any event, the proposed regulation would apply to containers or trailers and not to individual WPM, articles, or cargo.

Some issues that will need to be clarified are:

Does the labeling requirement apply only to the original fumigation container or will cargo off-loaded to secondary containers also require an EPA label?  
Is this requirement a duplication of a DOT regulation that requires a fumigated freight container be labeled as having been fumigated before it is transported?

For fumigators treating WPM the proposed buffer zone mitigation measures may impact their operations, especially where the fumigation is taking place at a WPM manufacturer where buffer zones may be severely restricted because of proximity to residential neighborhoods.

Comments on this proposed regulation can be submitted electronically at: <http://www.regulations.gov>. Follow the online instructions for submitting comments. Be sure to identify your comments using the docket identification number: EPA-HQ-OPP-20005-0123.

Questions can be directed to Steven Weiss, Special Review and Reregistration Division at (703) 308-8293 or by email at [weiss.steven@epa.gov](mailto:weiss.steven@epa.gov).

The EPA document, detailing this “TRED&RED” is available at our website:

<http://www.ahc.caf.wvu.edu/>

By following the links to “Fumigation” or “News” and clicking on “MB TRED&RED”, the pdf of the EPA document can be viewed.

## Debarking and Bark-Free Wood

### *Draft International Standard*

The presence of bark on WPM continues to be a concern to many countries. In response to these concerns the International Forestry Quarantine Research Group (IFQRG) has prepared a Draft ISPM Debarking Standard. The draft was distributed in May 2006 for country consultation. As stated in the Introduction of the draft, “This standard provides practical guidance to National Plant Protection Organizations (NPPOs) on differentiating wood with bark, debarked wood, and bark-free wood, and how the removal of bark may reduce the risk of introduction and/or spread of quarantine pests associated with wood. This standard also provides guidance to NPPOs in determining tolerance levels for bark where the removal of bark is used as a single phytosanitary measure”.

The deadline for country comments was September 30, 2006. The steward of the standard is currently reviewing comments and will prepare a report to Standards Committee (a subsidiary body of the IPPC which manages the standard-setting process), which meets in November of 2006. Based on the comments the Standards Committee will decide whether the standard should be developed further or to submit it to the Commission of Phytosanitary Measures (CPM) at their March 2007 meeting for possible adoption by member countries.

More information on this topic can be found in IFQRG's Debarked and Bark-Free Wood Draft Standard, a copy of which can be found on our website at:

<http://www.ahc.caf.wvu.edu/>

By following the "Bark" or "News" link click on "Debarked and Bark-Free Wood" to view the pdf.

### *Bark Survey Results*

A number of surveys were conducted in 2006, investigating the incidence of infested bark on treated WPM. A US port survey found 9.4% of 5,945 units of ISMP-15 WPM had bark. Of these, 1.2% of ISPM-15 marked WPM had live insects (all instances of non-compliant WPM were from a single country). Overall, 0.1% of all sampled ISPM-15 marked WPM had live insects. Further, live insects were only found on pieces of wood containing bark.

A survey conducted by the American Lumber Standards Committee and its accredited inspection agencies found that 20.1% of 2,681 units of ISPM-15 WPM had bark. Of these, none of the WPM had insects in the wood and only 0.2% had insects on the wood or free living nematodes associated with the wood.

Finally, a European Union survey sampled WPM with pieces of bark covering an area greater than 45 cm<sup>2</sup>. The survey indicated that 3.4% of 1,470 units, marked according to ISPM-15 standards and containing bark, had live insects or nematodes, originating from six countries.

Cumulative evidence from these and other surveys indicates that some ISPM-15 marked WPM with bark does transport live organisms, including insects, fungi, and nematodes. However, it is not totally clear at this time if the organisms are a result of problems with the ISPM-15 treatment or infestation after treatment.

More information on this topic can be found in "IFQRG's Review of Bark on Treated Wood Packaging Questions Posed by the IPPC Technical Panel on Forest Quarantine", a copy of which can be found on our website at:

<http://www.ahc.caf.wvu.edu/>

Additional information on the bark issue can be found in "IFQRG Position Statement on Bark and ISPM No. 15", also available at the above site.

## Country Updates

### Dominican Republic

As of July 1, 2006, the Dominican Republic of Ministry of Agriculture began implementation of ISPM-15, with no deviations from ISPM-15 requirements

### Nicaragua

The Nicaraguan Ministry of Agriculture, Livestock, and Forestry has notified the World Trade Organization (G/SPS/N/NIC/32) of its intention to implement ISPM-15. The WTO notification does not indicate a starting date for implementation.

### Oman

As of December 6, 2006 the Sultanate of Oman will implement ISPM-15, with no special requirements or deviations from ISPM-15.

**The following countries have made amendments to their ISPM-15 requirements:**

### Canada

Canada has adopted the April 2006 modification by the IPPC (International Plant Protection Convention) of the technical requirements for methyl bromide treatment. This amendment does not affect the movement of WPM from the United States into Canada.

### China

China has adopted the April 2006 modification by the IPPC (International Plant Protection Convention) of the technical requirements for methyl bromide treatment.

## India

Although not directly affecting WPM, India has begun requiring imported pine lumber to be heat treated to a core temperature of 56 degrees Celsius for 30 minutes. This requirement will commence on November 1, 2006.

A complete listing of countries enforcing ISPM-15 can be found at our website:

<http://www.ahc.caf.wvu.edu/>

## PALLET RECYCLING ISSUES

With significant numbers of compliant WPM now circulating throughout domestic and international markets, pallet recycling is emerging as a serious issue. The crux of the problem is dealing with WPM that has compliant marks, but is altered in some way.

For clarity, the IFQRG (International Forestry Quarantine Research Group) has provided specific definitions for Recycle, Remanufacture, Repair, and Re-use of WPM:

**Recycle** – a process whereby a previously used article of WPM is dismantled either partially or completely and the components used without further re-working in the manufacture of a WPM. (Recycling may include “remanufacturing”).

**Remanufacture** – a process whereby a previously used article of WPM is completely dismantled and the components used, either in their original form or after re-sawing, in the manufacture of another article of WPM. Remanufactured WPM may or may not incorporate new and previously unused components.

**Repair** – a process whereby a previously used article of WPM has one or more components removed and replaced with new and previously unused wood.

**Re-use** – a second or subsequent use of a unit of WPM which is not changed or altered in any way and which requires no official intervention.

Only in the case of re-use can a unit of WPM be placed back into service without needing to be retreated and remarked.

If the WPM is recycled, remanufactured or repaired, all original marks must be removed or obliterated and replaced by a single mark representing the facility

carrying out the appropriate treatment of the unit. In the US, this is how the issue is to be handled.

The problem is that some countries are not requiring removal or obliteration of existing marks, so that following treatment multiple marks may be present, making chain of custody determinations problematic. In the US, the recyclers not engaged with a certified enforcement agency have been known to circumvent ISPM-15 by recycling, remanufacturing or repairing WPM, maintaining the existing marks, not retreating the altered unit of WPM, and simply sell the WPM as ISPM-15 compliant. Companies who choose to conduct business in this manner are committing fraud and can be prosecuted in both civil and criminal court. A number of cases of fraud are ongoing and some have already been settled.

## WPM Heat Treatment DVD

We are happy to announce the that a DVD program outlining the basic heat treatment requirements of ISPM 15 and more importantly showcasing heat treatment equipment from 11 different manufacturers is still available.

The DVD and accompanying reference material are available by contacting Jeff Slahor via email at: [jslahor@wvu.edu](mailto:jslahor@wvu.edu) , or Larry Osborn at: [losborn2@wvu.edu](mailto:losborn2@wvu.edu).

Please provide your mailing address when requesting a copy of the DVD heat treatment package.