



Risk Management Proposal: Review and amendment of the import health standard: *Wood Packaging Material from All Countries*

FOR PUBLIC CONSULTATION

26 November 2019

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Submissions

The Ministry for Primary Industries (MPI) invites comment from interested parties on the proposed amendments to the import health standard (IHS) for *Wood Packaging Material from All Countries* which is supported by this discussion document.

An IHS “specifies requirements to be met for the effective management of risks associated with importing risk goods, including risks arising because importing the goods involves or might involve an incidentally imported new organism” (section 22(1) Biosecurity Act 1993). MPI therefore seeks comment on the proposed format and amendments to the requirements in the proposed IHS for *Wood Packaging Material from All Countries*. Submitters may also like to comment separately on other aspects of the IHS and MPI will respond to these in due course.

The following points may be of assistance in preparing comments:

- Wherever possible, comments should be specific to a particular change in IHS requirements or a question asked in this document (referencing Part numbers or subjects as applicable).
- Where possible, reasons, data and supporting published references to support comments are requested.
- The use of examples to illustrate particular points is encouraged.

MPI encourages respondents to forward comments electronically. Please include the following in your submission:

- The title of the consultation document in the subject line of your email;
- Your name and title (if applicable);
- Your organisation’s name (if applicable); and
- Your address.

Send submissions to: plantimports@mpi.govt.nz.

However, should you wish to forward submissions in writing, please send them to the following address to arrive by close of business on 31 January 2020.

Plant Imports
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Submissions received by the closure date will be considered during the development of the final IHS. Submissions received after the closure date may be held on file for consideration when the issued IHS is next revised/ reviewed.

Official Information Act 1982

Please note that submitted documents are public information. These documents may be the subject of requests for information under the Official Information Act 1982 (OIA). The OIA specifies that information is to be made available to requesters unless there are sufficient grounds for withholding it, as set out in the OIA. Submitters may wish to indicate grounds for withholding specific information contained in their submission, such as the information is commercially sensitive or they wish personal information to be withheld. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.

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Purpose

1. The purpose of this document is to:
 - a) incorporate by reference ISPM 15 directly into the import health standard;
 - b) update the import health standard format to an MPI standardised format; and
 - c) seek stakeholder feedback on the proposed import health standard amendment.

Background

2. The Biosecurity Act 1993 (the Act) requires that an import health standard (IHS) specifying the requirements to be met is in place before a risk good can be given biosecurity clearance.
3. MPI has been reviewing the biosecurity requirements of the IHS: *Wood Packaging Material from All Countries* (MPI 2009) because of the use of a specific international standard for wood packaging material: *ISPM 15 Regulation of wood packaging material in international trade* (ISPM 15).
4. The ISPM 15 standard and the “mark” used on wood packaging material has become internationally adopted and recognised since introduction in 2002.
5. Conditions from ISPM 15 were copied into the IHS: *Wood Packaging Material from All Countries* to give effect under the Act. Changes to the Act in 2012, where “incorporation by reference” was inserted, allow recognised and consulted material to be incorporated as if it were part of the biosecurity document (section 142M(e)). This effectively allows the IHS to link directly to the ISPM 15 requirements instead of repeating them.
6. The International Plant Protection Convention (IPPC) is the international standard setting body and responsible for all changes and updates to ISPM 15. All accepted changes have been through extensive consultation at IPPC with all 183 member parties.
7. By incorporating by reference directly to ISPM 15 the chief technical officer believes will provide the most up to date requirements and measures for protecting New Zealand from risks associated with wood packing materials.

Commodity description

8. ISPM 15 gives examples of wood packaging material as crates, boxes, packing cases, dunnage, pallets, cable drums and spools/reels.
9. “Wood packaging material” is defined under *Glossary of phytosanitary terms* (ISPM 5) as “wood or wood products used in supporting, protecting or carrying a commodity (includes dunnage)”.
10. Following on from the requirements in ISPM 15, these articles are of sufficiently low risk to be exempted from the provisions of the amended standard:
 - a) wood packaging material made entirely from thin wood (6 mm or less in thickness);
 - b) wood packaging made wholly of processed wood material, such as plywood, particle board, oriented strand board or veneer that has been created using glue, heat or pressure, or a combination thereof;
 - c) barrels for wine and spirit that have been heated during manufacture;

- d) gift boxes for wine, cigars and other commodities made from wood that has been processed and/or manufactured in a way that renders it free of pests;
- e) sawdust, wood shavings and wood wool; and
- f) wood components permanently attached to freight vehicles and containers.

Trade

- 11. Prior to the adoption of ISPM 15 the volume of wood packaging material used in trade was substantial. In the USA alone in 1999 it was estimated that 15.4 million m³ of wood was used in the construction of pallets and containers.
- 12. It is estimated that in 2018 approximately 523,000 sea containers carrying cargo arrived in New Zealand and from previous surveys 50% of these sea containers have wood packaging material.
- 13. Wooden pallets provide for quick loading and unloading of cargo by forklifts saving handling and labour costs. Alternatives are available (particularly pallets made from plywood and reconstituted wood products) but seem unlikely to replace solid wood packaging any time soon.

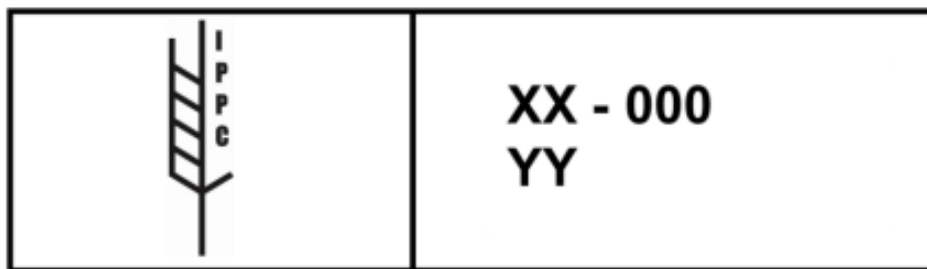
Current requirements

- 14. The current import requirements for wood packaging material from all countries are provided in the import health standard dated 1st November 2009 and can be found using this link: [Wood packaging Material from All Countries](#).
- 15. The current requirements repeat the mark information and the approved treatments given in ISPM 15.

International setting

- 16. Where possible, phytosanitary measures are aligned with international standards, guidelines, and recommendations as per New Zealand's obligations under Article 3.1 of the WTO Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement), WTO 1995 and section 23(4)(c) of the Biosecurity Act 1993.
- 17. The SPS Agreement states that phytosanitary measures must not discriminate unfairly between countries or between imported or domestically produced goods, and where there is a choice of phytosanitary measures to reduce risk to an acceptable level, WTO members must select the least trade restrictive measure.
- 18. International adoption of a standard implies that countries recognize the need for harmonised measures and that these countries are not required to individually provide technical justification for implementation of the standards [taken directly from the Explanatory document for ISPM 15, page 8].
- 19. If countries require measures beyond those described in ISPM 15, they are obligated to provide a technical justification. The technical justification should be based upon pest risk analysis with careful consideration of the appropriate level of protection [taken directly from the Explanatory document for ISPM 15, page 8].
- 20. The international standard ISPM 15 was adopted in March 2002 and has been revised in 2006, 2009 and 2013 with updated treatments. The use of the mark has spread globally since adoption.

21. Example of a mark from ISPM 15



22. Before the adoption of ISPM 15 in 2002, a number of countries concerned with the movement of wood pests recognised that some industrial processes of heating wood for commercial purposes was sufficient to kill a range of insects and wood inhabiting nematodes such as the pinewood nematode, *Bursaphelenchus xylophilus*.
23. Research confirmed that heating the profile of the wood including its core to a minimum temperature of 56°C for a period of 30 minutes was effective in killing these pests. More recent work has shown that this heat treatment also kills many fungal organisms associated with wood.
24. To date, there are 4 treatments recognised internationally as being effective in providing sufficient protection against quarantine pests associated with wood packaging material. These are 2 x heat treatments (heat treatment and dielectric heating); and 2 x fumigation treatments (methyl bromide and sulphuryl fluoride).

Objective

25. MPI's objective is to ensure that the known biosecurity risks associated with wood packaging material are managed appropriately and are consistent with New Zealand's domestic legislation and international obligations.
26. That the IHS is aligned to the international standard ISPM15 and that the treatments provided are efficacious and internationally accepted.

Summary of Risk

27. Wood may be infested by pests present in the area of origin at the time of growing or harvesting. Several factors can influence a pest's ability to infest trees or wood. These factors can also affect pest survival on or in the harvested wood, and in turn impact the risk of pest association with the wood packaging.
28. Several documented studies and pest risk assessments have shown that untreated wood packaging material can harbour pests which can be moved to new areas.
29. In general, the greater the level of processing or treatment of the wood after harvest, the greater the reduction in the pest risk.

Risk Management

30. ISPM 15 balances risk reduction to an internationally recognized acceptable level with least restrictive trade measures. The identified treatments do not provide absolute protection against all pests of wood, however, the application of these measures do provide a safer worldwide trading environment in which the majority of risks have been mitigated.
31. ISPM 15 encourages the application of a treatment in conjunction with debarked wood to be applied before the initial export of wood packaging material in the country of production. The treatments are prescribed in ISPM 15 and are believed to be sufficiently effective provided they are applied using good application services. Treatments and conditions of application are set out in Annex 1 of ISPM 15.
32. The approved treatments prescribed in ISPM 15 have been based upon assessments on a range of wood pests that are affected by the treatments; the efficacy of the treatments in killing wood pests, and the technical or commercial feasibility of the treatments for use on wood packaging material.
33. ISPM 15 requires the use of debarked wood in the construction of compliant wood packaging material. Debarking is an industrial process in which the majority of bark is removed from the harvested tree using metal teeth, knives or chains which tear the bark from the wood. Debarking is defined as “wood that has been subjected to any process that results in the removal of bark”.
34. Debarking does not result in wood which is entirely bark free. To manage the risk of insects, ISPM 15 requires that the removal of bark should result in wood that contains no more than 3 cm bark in width (regardless of the length) or if the residual bark exceeds 3cm in width, then any individual piece of bark should not exceed 50 square centimetres. These tolerances are also stipulated in ISPM 39 where debarking reduces the risk of pests completing their life cycle in untreated wood especially bark beetles.
35. Wood packaging material is often transported in moist environments where surface fungi may develop (e.g. moulds). Many of these fungi are ubiquitous organisms and do not pose a quarantine risk and do not require treatment upon arrival.
36. Provided untreated wood is not added during repairs or remanufacturing, wood packaging material that has been treated using heat or fumigation is unlikely to be susceptible to re-infestation. The remaining bark surface is insufficient to support most insect development, and once debarked, the cambium surface of the wood dries and becomes an unsuitable host for most pests.
37. The use of the ISPM 15 mark is an internationally accepted option to manage the risk of wood packaging material. Wood packaging material that is not ISPM 15 marked or is not accompanied by a treatment certificate is considered untreated and will require inspection upon arrival.
38. Provision of an off shore treatment certificate in lieu of the ISPM 15 mark is still an acceptable option under the proposed import health standard. Treatments are linked to the ISPM 15 standard.
39. ISPM 15 encourages compliance inspection of imports of wood packaging material.

Practicality of Measures

40. NPPOs are responsible for the implementation of ISPM 15 and therefore it is expected that exported goods will meet the measures of ISPM 15.
41. The obligation to comply with ISPM 15 is already an accepted practise and the options of heat treatment and fumigations in ISPM 15 are widely used by industry.
42. Referring directly to ISPM 15 by incorporation by reference in the import health standard enables New Zealand to operate under current internationally approved requirements.
43. Proposed changes to the import health standard do not impose additional costs, resources or time to industry.

References

Explanatory document for ISPM 15 (regulation of wood packaging material in international trade) Approved 2014, published 2017

https://www.ippc.int/static/media/files/publication/en/2017/02/ISPM_15_ED_En_2017-02-10.pdf

Frequently Asked Questions ISPM15

https://www.ippc.int/en/faq/?_sm_au=iHVPn8fvVHn6Njj5#Ispm15

ISPM 39: International Movement of Wood

https://www.ippc.int/static/media/files/publication/en/2017/05/ISPM_39_2017_En_2017-05-15.pdf

ISPM 15: Wood packaging Material

<http://www.fao.org/3/a-mb160e.pdf>