

Wood Packaging Material
Questions and Answers for Phase II
Updated February 15, 2006

Introduction

There have been several questions pertaining to the requirements of pallets and crates during the Phase II enforcement period. The Wood Packaging Material (WPM) Hotline has developed commonly asked questions to assist interested parties with gaining a better understanding of the International Plant Protection Convention (IPPC), International Standard for Phytosanitary Measures (ISPM) 15 regulation. Additional frequently asked questions can be found on the U.S. Customs and Border Protection (CBP) website at http://www.cbp.gov/linkhandler/cgov/import/commercial_enforcement/wpm/wpm_faq.ctt/wpm_faq.doc

1. Question: I have a question pertaining to inspectional and enforcement methods relating to the WPM requirements?

Answer: All inspectional and enforcement inquiries pertaining to agriculture should be directed to U.S. CBP at the port level. Contact information for U.S. ports can be accessed through the CBP website at <http://www.cbp.gov/xp/cgov/toolbox/ports/>. If you need further assistance, you can contact CBP agriculture headquarters at (202) 354-1000 or toll free at 1-877-CBP-5511.

2. Question: I need to know if my WPM meets requirements for importation (foreign WPM entering U.S. ports).

Answer: You should contact the Agriculture Specialist at the port of arrival for all WPM inquiries. If you still need additional assistance, USDA has supplied a WPM importation hotline for a limited time at (301) 734-5346 or toll free at 866-738-8197. Information can also be accessed through USDA's importation of WPM website at <http://www.aphis.usda.gov/ppq/wpm/import.html>.

3. Question: I need to know if my WPM meets requirements for exportation (U.S. WPM entering foreign ports).

Answer: Information can be accessed through USDA's WPM export website at <http://www.aphis.usda.gov/ppq/wpm/export/index.html>. Specific country's requirements can be accessed through <http://www.aphis.usda.gov/ppq/wpm/export/requirements.html>. If the country that you are exporting your WPM into is not listed, please contact the Export Certification Specialist in your state. Export Certification Specialists are listed through http://www.aphis.usda.gov/ppq/pim/exports/CPOs_exp.htm.

4. Question: I am calling from media and would like a statement pertaining to ISPM 15.

Answer: All APHIS media inquiries should be directed to the Legislative and Public Affairs Office at USDA. Information can be obtained through http://www.aphis.usda.gov/newsroom/lpa_contacts.shtml. All CBP media inquiries should be directed to the Press Officers at DHS. Information can be obtained through http://www.cbp.gov/xp/cgov/newsroom/press_officers/.

5. Question: I am importing furniture and various handicrafts made of wood. Do I need to have my commodity marked according to ISPM 15 requirements?

Answer: No. ISPM 15 phytosanitary measures apply only to unmanufactured WPM. Wood packaging material includes, but is not limited to: pallets, crates and dunnage used to ship and/or secure a commodity for transportation.

Please be advised that wooden handicrafts made in China may be subject to the import suspension. For further information please visit http://www.aphis.usda.gov/lpa/pubs/fsheet_faq_notice/faq_phmanufacturedwood.htm.

6. Question: I am importing perishables into the U.S. and the wooden pallets are compliant based on ISPM 15 marking regulations. However, several of my containers have been denied entry because the CBPO/CBPAS performing the inspection could not see the stamp on the side of the pallets. I have offered to supply the Port with documentation showing treatment, as well as proof that the WPM had been stamped.

Answer: ISPM 15 requires that your pallets be permanently and legible marked on preferably two opposite sides. If you are encountering problems relating to inspectional and enforcement issues, contact the port directly. Contact information for U.S. ports can be accessed through the CBP website at <http://www.cbp.gov/xp/cgov/toolbox/ports/>. If you need further assistance, you can contact CBP agriculture headquarters at (202) 354-1000 or toll free at 1-877-CBP-5511.

- 7. Question: My entry was refused because the WPM was not stamped according to ISPM 15 requirements. Can I still bring in my commodity, but re-export the noncompliant WPM?**

Answer: The importer may request separation of the imported commodity from the non-compliant WPM through the CBP Port Director. The CBP Port Director will determine if separation is feasible or not. Additional information and enforcement protocols can be accessed through the following CBP website
http://www.cbp.gov/linkhandler/cgov/import/commercial_enforcement/wpm/phase2_implementation.ctt/phase2_implementation.doc.

- 8. Question: I use pallets for the provisions/stores used on cruise ships. Do I need to have approved marked pallets?**

Answer: Cruise ships with **only** U.S. stores that travel solely from the U.S., foreign ports, and back to the U.S. may unload or reuse any domestic pallet. Domestic refers to the continental U.S. including, American Samoa, Commonwealth of the Northern Mariana Islands, Guam, Puerto Rico, and the U.S. Virgin Islands. When international stores are commingled with U.S. Domestic stores all WPM must meet the ISPM 15 marking requirements. In general it is best to utilize only WPM that meets the ISPM 15 or utilize non regulated packing material

- 9. Question: My pallets/crates are made of plywood with 2-by-4s used as footers/bracings. Am I still required to get the pallets stamped even though the majority of the unit is made with plywood, which is exempt from the requirements?**

Answer: Yes. Any form of unmanufactured wood that is used during the construction of a pallet or crate must meet the ISPM 15 phytosanitary and marking requirements.

- 10. Question: My pallet/crates are made with several pieces of unmanufactured wood. Do I have to have each individual piece of wood stamped?**

Answer: No. Each pallet/crate is considered a unit. ISPM 15 requires that your pallet/crate should be legible and permanently marked in a visible location, at a minimum on two opposite sides.

11. Question: My pallets have been fumigated and I stapled the certificate onto the pallet so that the inspector could see it when the container was opened, but my shipment was still refused. I had my pallets treated according to the ISPM 15 regulations, so why was my shipment refused?

Answer: The ISPM 15 phytosanitary standard is paperless. If the fumigation meets the ISPM standard, the mark must be approved and incorporated onto the packing material to represent adequate Phytosanitary measures have had oversight by the foreign NPPO. The mark is valid for the life of the WPM, thus the requirement of the legible and permanent mark.

12. Question: Do I have to have all of my pallets marked according to ISPM 15 in my warehouse in the U.S.?

Answer: No. Pallets do not have to be marked according to ISPM 15 requirements if they are for domestic use. Domestic use includes the continental U.S. and territories of Guam, American Samoa, Commonwealth of the Northern Mariana Islands, Puerto Rico, and the U.S. Virgin Islands.

13. Question: My company moves domestic cargo from the U.S. to our company warehouse located in a foreign country. When the WPM returns to the U.S. will it be viewed as Domestic WPM?

Answer: No. Unmarked WPM when exported from the U.S. shall be impossible to validate the origin of the material. Consequently, any unmarked WPM will be viewed as foreign origin. It is recommended that importers in this situation utilize appropriately ISPM 15 marked WPM or non regulated WPM to avoid delays and/or refused entry status of cargo.

14. Question: Where can I gain information on the IPPC program in other countries where my WPM is originating from?

Answer: Requests for information pertaining to individual country's ISPM 15 programs should be directed to the contact point for the Country's National Plant Protection Organization. The most up to date information is available at the International Plant Protection Convention website at <https://www.ippc.int/IPP/En/nppo.jsp>.

15. Question: Do my pallets have to originate solely from the country of export?

Answer: No. Once WPM is treated and marked according to ISPM 15 requirements, it is valid for the life of the WPM and may follow normal trade. Therefore, it can be utilized for trade between any country.