



## UPDATES AS OF 05/02/21

### Wood Packaging Material (WPM) requirements from 1 January 2021

Previously, all wood packaging material (WPM) moving between the United Kingdom (UK) and the European Union (EU), including Switzerland and Liechtenstein, could move freely without checks and controls. At the end of the Transition Period, 1 January 2021, this changed.

All WPM moving between GB and the EU must meet ISPM 15 international standards by undergoing heat treatment and marking. All WPM may be subject to official checks either upon or after entry to the EU or GB. This requirement is already in place for WPM moving between non-EU third countries, and the EU, and UK.

Checks on WPM are carried out in GB on a risk-targeted basis. The plant health risk from WPM imported from the EU is not expected to have changed since 1 January 2021.

### WPM from 1 January 2021 Q&A

#### Treatment and Compliance

##### What products does WPM refer to?

Wood packaging material (WPM) includes:

- Pallets
- Boxes
- Crates
- Cable drums
- Dunnage

##### What is ISPM 15?

The International Standard for Phytosanitary Measures 15 (ISPM 15) sets out measures required to reduce the risk of the introduction and spread of pests associated with wood packaging material (WPM). For GB, this requires all WPM (bar exceptions) entering and leaving GB to be treated and marked.

#### **Updated: Are there any exemptions?**

Whilst there can be exceptions to the exempted products listed below, depending on the country of origin and the type of wood used in the product manufacture, the following articles are generally regarded as being of sufficiently low risk to be exempt from ISPM 15 requirements –

- *wood packaging material made entirely from thin wood (6 mm or less in thickness)*

- *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*

*- barrels for wine and spirit that have been heated during manufacture*

*- 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*

*- sawdust, wood shavings and wood wool*

*- wood components permanently attached to freight vehicles and containers.*

*An exclusion also applies to dunnage which is associated with consignments of controlled timber 'associated controlled dunnage'. This applies to means which supports a consignment of wood and is of the same genus or species specified in the entry declaration and which—*

*(i) is constructed from wood of the same type and quality as the wood in the consignment; and*

*(ii) meets the requirements specified.*

#### **How do I ensure my WPM is compliant?**

Contact your supplier or [TIMCON](#) if you need more advice about sourcing ISPM 15 compliant WPM.

#### **New: What codes should be included and legible on my WPM to ensure it's compliant?**

To be compliant with ISPM 15, WPM needs to have been officially marked with the ISPM 15 stamp consisting of three codes (country code, producer code and the treatment applied) and the International Plant Protection Convention (IPPC) symbol.

Further guidance on the ISPM 15 mark can be found [here](#).

#### **New: What treatments and their codes are appropriate for ISPM 15 as WPM show a variety of codes?**

The IPPC ISPM 15 guidance available [here](#) details appropriate treatments for ISPM 15.

This includes:

- MB (Methyl Bromide treatment)
- DH (Heat Treatment using Dielectric Heating)
- SF (Sulphuryl Fluoride treatment)
- HT (Heat Treatment)

#### **New: What are the requirements for stamping individual pieces of dunnage with the ISPM 15 mark?**

The rules for marking dunnage are set out in this International Plant Protection Convention publication, available [here](#).

There is also an explanatory publication, available [here](#).

### **New: Is there a full list of ISPM 15 rules for importing and exporting?**

The rules for marking WPM are set out in this International Plant Protection Convention publication, available [here](#).

There is also an explanatory publication, available [here](#).

### **What happens if my WPM is not compliant?**

Where non-compliant WPM is identified, it is removed from use and destroyed in a way that eliminates any phytosanitary risk. Plant health inspectors serve statutory plant health notices on those responsible for the non-compliant WPM and these notices will specify the remedial action.

Failure to comply with a statutory notice is an offence punishable by civil and/or criminal sanctions as detailed [here](#).

### **Is industry set up to carry out ISPM 15 treatment and marking on all wood packaging material?**

The wood packaging material (WPM) industry have been working tirelessly to increase the stock of compliant WPM. The UK Timber Pallet and Packaging Confederation (TIMCON) report that WPM treatment capacity has increased, with a greater number of heat treatment facilities (kilns), operating over longer hours. Defra and the Forestry commission also agreed with the WPM manufacturing sector a temporary easement that allows them to repair their ISPM 15 pallets with heat-treated wood. This measure has freed up kiln capacity, as the UK scheme rules normally require a whole pallet to be heat-treated after repairs are made.

## **Importing and exporting**

### **Does WPM moving between GB and the EU need to be ISPM 15 compliant?**

Since 1 January 2021 all WPM moving between GB and the EU must be treated and appropriately marked in compliance with international standards (ISPM 15).

### **Does WPM moving from Northern Ireland (NI) to GB need to be to be ISPM 15 compliant?**

As committed to in the [New Decade, New Approach](#) deal to restore the Northern Ireland Executive, the UK Government will guarantee unfettered access for Northern Ireland's businesses (including businesses headquartered in Great Britain with operations in Northern Ireland) to the rest of the UK internal market from 1 January 2021, ensuring that trade from Northern Ireland to Great Britain continues for those businesses as it does now.

Therefore, wood packaging material (including wooden pallets) moved from NI to GB by NI since the end of the transition period businesses do **not** need to comply with international standards (ISPM 15).

### **Does WPM moving from GB to NI need to be ISPM 15 compliant?**

As set out in the Command Paper on [The UK's Approach to the Northern Ireland Protocol](#), and proposed by the UK Government last October, there will be new sanitary and phytosanitary (SPS) requirements on goods moving from Great Britain to Northern Ireland. These requirements will uphold the longstanding status of the island of Ireland as a single epidemiological unit.

Since the end of the transition period, wood packaging material, including pallets and crates, moving from GB to NI need to be treated and appropriately marked in compliance with international standards ISPM 15.

### **New: Does WPM moving between ROI/NI and EU transiting across GB as a land bridge need to be ISPM 15 compliant?**

Since the end of the transition period, all wood packaging material (WPM) moving between GB and the EU must be treated and appropriately marked in compliance with international standards (ISPM 15). However, WPM being used to move goods from EU member states to the Republic of Ireland and NI, either under transit via Great Britain or directly, does not need to be ISPM 15 compliant.

### **Does WPM moving from ROI to NI need to be ISPM 15 compliant?**

Building on the existing practice established to maintain the Single Epidemiological Unit on the island of Ireland, Northern Ireland is aligned with EU Sanitary and Phytosanitary rules. Therefore, wood packaging material (including wooden pallets) moved from the Republic of Ireland to Northern Ireland does not need to comply with international standards (ISPM 15).

### **Will there be new checks on WPM moving into GB?**

As there is no immediate change to the WPM biosecurity threat as a result of the end of the transition period, GB are continuing to take a risk-based approach to checks on WPM.

### **Will there be new checks on WPM moving from GB to the EU?**

Since the end of the transition period, all wood packaging material (WPM) moving between GB and the EU must be treated and appropriately marked in compliance with international standards (ISPM 15). This is in line with international requirements for trade and is in place to protect both the EU and GB from harmful plant pests and diseases.

### **Updated: Does having an agreed Free Trade Agreement between the UK and the EU, mean WPM travelling into the UK from the EU still needs to be ISPM 15 compliant?**

The UK has left the EU's customs union and single market with a Free Trade Agreement. However, all wood packaging material (WPM), including wooden pallets, moving between GB and the EU must be treated and appropriately marked in compliance with international standards (ISPM 15). This is in line with international requirements for trade and is in place to protect both the EU and GB from harmful plant pests and diseases.

## **Wooden Pallets**

### **New: We occasionally export empty pallets. How do they fit into this process - are they the same as any other goods?**

Pallets and other solid wood packaging are treated slightly differently to other wood products. The ISPM 15 mark applies to the movement of pallets whether they are in use or not and, for exporting empty pallets, the ISPM 15 mark replaces the need for an export phytosanitary certificate. From a biosecurity perspective, since the end of the transition period, all wood packaging material (WPM) moving between GB and the EU must be treated and appropriately marked in compliance with international standards (ISPM 15).

### **New: Once a Pallet is marked as compliant to ISPM 15 does it have to be maintained as compliant?**

Yes. According to the Standard, an ISPM 15 marked pallet remains compliant so as long the mark remains legible. In the event that the pallet needs repair then this should also be re-marked by a member of the UK Wood Packaging Material Marking Programme.

#### **New: Can ISPM 15 pallets arriving in the UK be re-used for export?**

Yes. These pallets can be reused for export to the EU and other non-EU third countries. Please note that the ISPM 15 stamp must be legible on the pallet in order for this to be compliant with ISPM 15 requirements.

#### **New: Do ISPM 15 pallets need to be heat-treated again before they are reused?**

Once a pallet is heat-treated and marked according to ISPM 15 international standards then it can be re-used without requiring further heat-treatment.

The only situation when further heat-treatment may be required is in the event the pallet needs to be repaired and/or remarked. Under these circumstances the pallet may be repaired with heat-treated timber and re-marked by the repairer, or the whole pallet may be re-treated and re-marked according to the way that ISPM 15 requires.

#### **New: In traffic between the UK and the EU there are a large number of pallets in circulation, not all of which will be back to where they originally came from by December 31 2020. Is there a certain transition period during which these pallets can be 'exchanged' for treated pallets, for both the UK and EU?**

Since 1 January 2021, all wood packaging material (WPM) moving between GB and the EU must be treated and appropriately marked in compliance with international standards (ISPM 15). This is in line with international requirements for trade and is in place to protect both the EU and GB from harmful plant pests and diseases.

There is no grace/transition period; the EU commission have been clear that they could not grant one, and that it is up to each Member State to establish their own monitoring plans based on their assessment of the risks posed by GB.

As there will be no immediate change to the WPM biosecurity threat as a result of the end of the Transition Period, GB are continuing to take a risk-based approach to checks on WPM.

### **Frequently asked products**

#### **New: I am importing cubes of timber. Do these need to be heat treated?**

The rules for imports of sawn timber are different to the rules for WPM. The rules that apply depend on the type of wood and which country the wood originates from. For example, heat-treatment of conifer wood is required if it originates from Spain or from Portugal. Sawn conifer wood which is free from all bark and originates from elsewhere in Europe does not need to be heat treated.

#### **New: Are CC trolley shelves exempt from requiring an ISPM 15 stamp?**

Yes, wood components permanently attached to freight vehicles and containers are generally regarded as being of low risk and are exempt from ISPM 15 requirements. This exemption extends to the shelves of CC trolleys.

### **Does wood packaging material in the form of stickers and spacers and dunnage used to transport consignments of regulated sawn timber need to be ISPM 15 compliant?**

Where wooden stickers, spacers and dunnage are used to transport consignments of regulated sawn timber and they are of the same type and quality as the timber commodity being shipped, then they do not need to be compliant with ISPM 15.

### **New: Does wood packaging material in the form of stickers and spacers and dunnage used to transport consignments of unregulated sawn timber need to be ISPM 15 compliant?**

If the timber is not controlled, then legally ISPM 15 will still apply. However, in practice, we take the view that if the associated dunnage has no phytosanitary relevance then we wouldn't insist on ISPM 15.

### **New: I am exporting flooring materials with wooden wedges or shims to support them, do these need to be ISPM 15 compliant?**

If the shims or wedges are used to support the flooring during transport then these are treated as dunnage and are required to be ISPM 15 compliant. Alternatively, if the wedges or shims are supplied to be used separately in the construction of the flooring then they are not required to be ISPM 15 compliant.

### **New: Do boxes for wine need to be ISPM 15 compliant?**

No, boxes for storing wine are part of the product itself. If the boxes are made from wood that has been processed and/or manufactured in a way that renders it free of pests then these are not required to be ISPM 15 compliant.

### **New: Do wooden display stands used to transport goods need to be ISPM 15 compliant?**

No, where the display stand is part of the product and so long as the boxes are made from wood that has been processed and/or manufactured in a way that renders it free of pests then these don't need to meet ISPM 15.

### **Do wooden manufactured products, such as staircases, entering GB from EU need to be treated for insects as part of the ISPM 15 requirements?**

Manufactured/processed items, such as wooden staircases, are not wood packaging material and they are not on the regulated plants and plant products list and therefore do not require a phytosanitary certificate or pre-notification, or to be ISPM 15 compliant.

## **Further information**

### **Where can I find more information?**

More information and advice on importing and exporting wood packaging material can be found at [gov.uk](https://www.gov.uk) and [TIMCON](#).

Further guidance on importing and exporting plants and plant products in the post-transition period can be found at [gov.uk](https://www.gov.uk).