

# MEETING OF THE UK WOOD PACKAGING MATERIAL PROGRAMME ADVISORY COUNCIL HELD AT SILVAN HOUSE, EDINBURGH ON 19<sup>TH</sup> MAY 2009.

## In attendance:

Mr. Roddie Burgess (RB)	-	Chairman, Forestry Commission Plant Health Service
Mr. Ian Brownlee (IB)	-	Forestry Commission Plant Health Service
Mr. David McMullan	-	Forest Service, DARDNI
Mr. Paul Tait (PT)	-	NAPD (Evergreen Pallets)
Mr. John Dye (JD)	-	TIMCON (Marlaw Pallets)
Mr. David Sulman (DS)	-	UKFPA
Mr. Gil Covey (GC)	-	TIMCON (Unit Pallets)
Mr. Arthur Jenkinson (AJ)	-	CHEP
Mr. Stuart Hex	-	TIMCON Secretariat

## Apologies:

Mr Ian Pirie, UKFPA (James Jones and Sons)  
Mr Richard Moseley, BPCA  
Mr Peter MacKenzie, NAPD, (Tyne and Wear Pallets)

## 1. WELCOME

The Chairman, Mr Roddie Burgess, welcomed those present.

## 2. COMPOSITION OF THE ADVISORY COUNCIL

John Dye **PROPOSED** that Paul Davidson, TIMCON Executive Member and Director of British EPAL (BREPAL) open-loop pallet pool, should be co-opted to the Advisory Council. Members of the Advisory Council agreed, stating that his experience and knowledge of the industry would be a valuable addition. RB **AGREED** to formally invite him onto the Advisory Council.

**ACTION: RB**

IB raised concern that case-makers and export packers were under represented on the Council. JD **PROPOSED** that Christopher Towne, of C E A Towne Ship Riggers in Hull and TIMCON Executive Member, should be approached to join, citing his extensive knowledge in this area and especially in relation to dunnage. He suggested the alternative of John Williams of Rowlinson Packing, also a TIMCON Executive Member. It was **AGREED** that Chris Towne

should be approached in the first instance, and JD **AGREED** to speak to him to see whether he would be willing to join.

**ACTION: JD**

### **3. PAPER AC3**

#### **A) REPAIR:**

RB circulated an email by Paul Davidson (PD), quoting Section 4.3.2 of the revised text of ISPM 15 “Repaired wood packaging material” which states:

*“Wood packaging material bearing multiple marks may create problems in determining the origin of the wood packaging material if pests are found associated with it. It is recommended that NPPOs of countries where wood packaging material is repaired limit the number of different marks that may appear on a single unit of wood packaging material. Therefore NPPOs of countries where wood packaging material is repaired may require the repaired wood packaging material to have previous marks obliterated, the unit to be re-treated in accordance with Annex 1, and the mark then applied in accordance with annex 2.”*

PD’s concern, related to the potential for NPPOs to refuse an item bearing multiple marks over and above a limit an NPPO might decide to set, and to the marking of, for example, a replaced central top deck board where visibility would be unachievable.

RB **REPORTED** that each NPPO has been recommended to limit the number of different marks which appear on any single unit, but there is no guidance on what this might be limited to. He **REMINDED** the AC that ultimately, each NPPO has the sovereign right to implement the standard in any manner they wish, and the Forestry Commission has no feeling for how other countries will interpret the revised standard. There is a case to suggest that anything above 2 marks makes it difficult to assign ownership and responsibility for that packaging. The standard now made a provision for classing the replacement of up to one-third of components as a repair, and this need not all be done in one operation. There was therefore scope for a good many marks. He further **REPORTED** that the FC had not discussed the UK position, but that prime consideration has to be to keep trade flowing.

AC members **EXPRESSED CONCERN** that some of this ambiguity contained in the standard may encourage certain countries already known for employing heavy handed practices at borders, to become even more draconian in their implementation of the revised standard. RB **REPORTED** that the UK could impose a 2 mark limit (or any other number) on packaging products, both for incoming and outgoing goods. The key questions are at what point do multiple marks become a problem for NPPOs and how do we minimize the possibility of packaging products being challenged at the borders with our trading partners?

JD **REPORTED** that multiple marking raised important issues relating to traceability. The AC **AGREED** unanimously that multiple marking contradicts the traceability rationale and compromises the credibility of ISPM15.

It was **AGREED** that there should be a pragmatic approach to cater for different types of packaging units. Boxes and cases, for example, may be capable of having individual repair components legibly marked on 2 visible sides, but for pallets, this was not practical. The AC **AGREED** to the retention of the current repair requirement of the UKWPMMP whereby, with limited exceptions, all repaired articles of WPM are subjected to re-treatment and remarking. If there was a demand for emergency repairs, such as on the dockside, then this could be accommodated but it was agreed to set the total number of different marks at 2. (ie, only one emergency repair per unit of WPM would be permitted). It was also **AGREED** that the UK should publicize its opposition to multiple marking. PT drew parallels between ISPM15 (and the issue of multiple marking) and a passport, stating that you would not get into a country with 3 different passports. He echoed previous concerns that without a limit on multiple marking, the UKWPMMP is in danger of losing credibility.

RB **REPORTED** that there is scope for the rest of the packaging sector to allow for emergency repairs of damaged packaging units waiting to be shipped at dock, something the US allows for currently. The prevailing opinion of the AC was that there was no real demand for this service in the UK, but recognition that this might be an unofficial and unsanctioned practice going on currently anyway. It was **AGREED** that the Forestry Commission should write to BIFA for guidance and offer them the facility to provide such a service under the banner of ISPM15.

**ACTION : IB**

## **B) NEW MARKING MODELS**

RB **CONFIRMED** the new requirements are that the marks must be contained within a border and must not contain information, logos etc not required in the mark (just IPPC logo, ISO country code, producer code, with the 'FC' prefix before the number, and treatment code), Marks may be any size or shape and 6 examples of variations are shown in Annex 2 of ISPM15.

RB gave a summary of research, discussions and agreements made on the subject of bark, which concluded that bark no longer than 3cm in width and any length was acceptable, and individual pieces of bark up to the size of a credit card were also allowed. Consequently, the DB code has been dropped as a requirement.

JD **REPORTED** that customers in certain industries, like, for example, the pharmaceutical industry, still request bark-free timber packaging products because of the sensitive nature of their goods. The AC understood this may be the case, but that to provide packaging without bark has essentially become a commercial decision.

RB further **REPORTED** that the UKWPMMP Assessment Agencies have all been instructed to ensure that new applicants to the programme obtain the new style of mark with immediate effect. Programme members who have a replicate of their mark on their websites must now ensure that they are amended as soon as possible to remove any such logos (even if they are still using them on the stamps prior to changing them over).

With regards to the transition period for existing programme participants – RB **PROPOSED** as long a period as possible, to limit financial burdens on members but appreciated that the industry may well be driven by importing countries demanding new marks. The latter will be the case even though old marks may well be in circulation for a number of years). The AC hoped that countries will adopt a pragmatic approach to the implementation of the new marks, recognizing that pallets have an average lifecycle of around 10 years.

It was **AGREED** that the transition period should start with the next assessment or one year from the date of the last, whichever is the later. That would give everyone at least 6 months, and anything up to a year. RB **AGREED** to check whether this may need change to the legislation which might cause a slight delay.

**ACTION: RB**

RB **REPORTED** there may be some concern that certain countries might have a stricter implementation time and insist the new mark is used with immediate effect, in which case the Forestry Commission would challenge and raise objections with that country. Once again however, it should be understood that each NPPO does have the sovereign right to put a time limit on this. He further **REPORTED**, that customers may request a new mark as soon as possible anyway to limit the risk of the product being refused entry.

GC requested clarification as to where the stamp should be applied on a mixed plywood and solid wood packaging product. RB **REPORTED** that the mark should be applied on 2 visible sides irrespective of whether it is made from solid wood or plywood as the mark denotes the entire ‘packaging unit’ meets ISPM15 requirements.

#### **4. PAPER AC4 - ASSESSMENT FREQUENCY**

RB gave a background to the assessment process and reasons why 6 monthly assessments were introduced (see paper AC4) and **REPORTED** that there’s a feeling that the scheme should look to reduce costs to businesses in the current economic climate. He **REPORTED** that the assessment agencies had been asked for their input on the possibility of moving to a 12 monthly assessment procedure (the results of which were circulated to the AC) and now asked the AC to consider this in an open discussion.

PT **REPORTED** that NAPD members (the majority of whom are road hauliers) have already been subject to a raft of industry legislation and believe that 6 monthly assessments did seem excessive and an unnecessary cost burden. He **PROPOSED** that an initial 6 monthly assessment regime should be applicable for new members to ensure they can demonstrate they are complying with and understand their obligations. Thereafter, he **PROPOSED** it could shift to a 12 monthly assessment regime for those companies that have consistently demonstrated their compliance with ISPM15. Conversely, should a company be demonstrating non-compliance they could be put on a 3 monthly assessment regime until such time they have improved their ISPM15 operations.

DS **REPORTED** that members of the UKFPA could not understand why they have to be subjected to 6 monthly assessments, when under their other industry ‘standards’ and ‘quality

assurance' program obligations it is every 12 months. He suggested that perhaps the sawmilling industry could be exempt from the 6 monthly assessments and instead be accorded the ability to have them done annually.

**GC REPORTED** his belief that 6 monthly assessments are imperative to the credibility of the scheme, and to ensure compliance. Whilst other industry related 'quality assurance' and 'standards' programmes may have annual inspections, the logistics of ensuring compliance with ISPM15, coupled with the opportunity of fraud and non—compliance (the potential dire consequences of which, as evidenced by the spread of the PWN in Portugal) makes frequent assessments a necessity. The AC should look at the bigger picture rather than individual industry interests.

**AJ and JD REPORTED** their belief that 6 monthly assessments give confidence to the industry and must absolutely be retained, especially in the context of recent development within Portugal and the EU.

**DS DISAGREED** and felt that it was unreasonable to require 6 monthly assessments and **OBJECTED** to the proposal for the current regime to be retained. He also felt that being the only sawmilling representative present at the AC discussions meant his industry was not adequately represented.

**GC** Noted that the Advisory Council should not overlook the changes in the UK programme following the revision of ISPM 15 which he felt supported the case for retaining 6-monthly assessments meantime.

**RB SUMMARISED** that there were sound arguments both for and against 6—monthly assessments but he felt swayed by the fact that the revision of ISPM 15 would take time to bed in. He therefore concluded that the current arrangements should stay in place for now but **PROPOSED** that this should be reviewed in a year's time with a view to reducing the frequency. The AC **AGREED** to this proposal.

## **5. EU DEVELOPMENTS**

**RB REPORTED** that there was a strong appetite for EU implementation and the European Commission is prepared to meet with industry representatives to assist in this endeavour. He further **REPORTED** that the EC recognised that it was unrealistic to impose immediate implementation and suggested that the implementation process will likely take place between 2-5 years, but closer to 2 years because of events in Portugal. The Forestry Commission does favour EU implementation for cross border movement of timber packaging, but does not support implementation within member states, and would actively oppose such a move. In fact, **RB REPORTED**, the UK already has import requirements for wood and meets the protected zone requirements as it has retained EU border controls. **RB REPORTED** he was still awaiting a formal proposal from the European Commission to be able to see the fine detail of EU implementation.

GC gave a **REPORT** on a recent FEFPEB meeting with the EC (DG Sanco and DG Enterprise) regarding the PWN outbreak in Portugal. The Committee were keen to enhance its emergency measures which Portugal had said it could meet and which may ultimately harm the EU timber packaging industry as a whole. Initially, he **REPORTED**, the Committee rejected a formal request for an extension on the date by which Portugal was required to implement a requirement that all WPM used for exports must be ISPM 15 compliant, regardless of country of manufacture (16 June 2009). However, following further discussions it seems that FEFPEB's presentation to the Committee might be bearing fruit, and the Committee has asked for FEFPEB to make another presentation in a week's time to the Standing Committee on Plant Health.

AJ gave a **REPORT** on the research that CHEP have undertaken to ascertain more information about PWN. Specifically, to understand the risk and circumstances in which the nematode can be transmitted in WPM, the first results of which will be available in May/early June 2009, with the main results coming at the end of 2009. He also **REPORTED** on another research project (not led by CHEP) that is looking at finding a means of treating the tree at its root, which might provide a barrier to nematode proliferation but which will take some time to complete. It maybe, he further **REPORTED**, that CHEP will seek to lead this project in the near future.

RB **REPORTED** that PWN has been found in a tree 80km inside the Spanish border, and 12km from the nearest production plant (sawmill), and has provided a real mystery as to its origin. The tree was discovered as a result of 2500 surveys conducted by the Spanish NPPO, but no other infested trees have been found. An extensive eradication programme had been executed.

He said Spain is actively seeking EU funds offset the cost of its preventative measures, put at approx. €2.5 million. They had suggested that this is an accidental introduction, and are associating the infested tree with the nearest sawmill where they had previously found logs containing PWN. He was not sure whether this sawmill was the source, as the only means by which a PWN could have infested that tree is via the wood borer *Monochamus galloprovincialis*, which generally flies only a few hundred metres and not the 12km distance between the mill and the infested tree. More likely, he felt, was that a lorry carrying infested logs from Portugal could be the cause with either infested debris falling off en route or a vector carrying PWN flew from the logs in the vicinity of the tree. However, it seemed unlikely that further movement restrictions will be imposed in Spain given that extensive surveys have failed to find any other infested trees and the outbreak may be considered eradicated.. There was a very low chance of PWN spreading naturally out of Portugal elsewhere in Europe.

## **6. CUSTOMER SURVEY**

IB circulated the results of the ISPM15 Customer Survey and the AC was pleased to note there were no complaints or causes for concern regarding the scheme administration and operation.

It was agreed that administration charges would be reviewed. TIMCON will provide accounting information and a meeting will be convened with the Forestry Commission in the near future.

**ACTION: JD/IB/SH**

*-End*