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**Canadian Food Inspection Agency  
Plant Products Directorate  
Plant Health Division  
Forestry Section**

**Wood Packaging  
Questions and Answers**

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## **Q.1 Why has Canada established new import requirements for the entry of wood packaging?**

**A.1** Many countries have recognized that wood packaging is an important pathway in the transmission of several very serious forest pests. Generally, wood packaging material has been made from raw wood which is associated with many exotic phytosanitary pests.

In March 2002, the International Plant Protection Convention's (IPPC's) Fourth Interim Commission on Phytosanitary Measures (ICPM 4) adopted new guidelines for the uniform regulatory control of wood packaging moving in international trade: *International Standard for Phytosanitary Measures (ISPM) 15: Guidelines for Regulating Wood Packaging Material in International Trade*. ISPM 15 describes guidelines for harmonized phytosanitary measures applicable to wood packaging material. Canada as a member of the International Plant Protection Convention has adopted this international standard as a import policy for Canada.

## **Q.2 Why are regulations needed to control wood packaging moving internationally?**

**A.2** Many invasive plant pests have been intercepted on wood dunnage, pallets, crating or other wood packaging materials imported into Canada. Examples of plant quarantine pests intercepted include: *Anoplophora chinensis*, *Anoplophora glabripennis*, *Ips typographus*, *Hylastes ater*, *Monochamus* sp., *Trichoferus campestris* and others. The introduction of the Asian long horned beetle (*Anoplophora glabripennis*), pine shoot beetle (*Tomicus piniperda*), emerald ash borer (*Agrilus planipennis*) can be attributed to wood packaging moving internationally in trade.

**Q.3 When will these new requirements come into effect?**

**A.3** The new rules are in effect now.

**Q.4 Will there be some grace period for wood packaging shipments?**

**A.4** Yes. To permit countries with sufficient time to change export practices to meet Canadian import policy, Canada will not be taking hard enforcement action (such as refusing entry of the consignment to Canada if it is not compliant) on shipments that are pest and disease free, until April 1, 2005. During this interim period Canada will provide non-compliance notifications to importers and the country of origin of the wood packaging. In advance of commencing hard enforcement actions, Canada will notify trading partners and importers.

Commencing April 1st, 2005, shipments found infested will be ordered treated, disposed off or returned to the country of origin. All costs associated in dealing with non-compliant shipments are the responsibility of the importer or the person in care and control of the importation.

Further information on Canada's phase-in strategy of new wood packaging requirements by visiting [the web site](#).

**Q.5 What items are considered wood packaging?**

**A.5** Any of the following that is made from non-manufactured wood: dunnage, pallets, spacers, bearers, crating, etc.

**Q.6 What types of wood packaging items are exempt from these requirements?**

**A.6** Packaging that is made from manufactured wood, such as plywood, oriented strand board, fibre-board, etc., from paper or cardboard products or hose made from non-wood articles are exempt from these requirements. In addition, wood packaging items made from wood less than 6 mm or from veneer peeler cores is also exempt. Veneer peeler cores are a by-product of veneer production involving high temperatures and comprising the centre of a log remaining after the peeling process.

**Q.7 What do I need to do to make sure my foreign wood packaging is compliant for entry into Canada?**

**A.7** Wood packaging originating from any country other than the continental United States, that enters Canada following April 1<sup>st</sup>, 2005 must meet the following requirements:

- The wood packaging must be heat treated or fumigated using methyl bromide at rates specified in policy [D-98-08](#);
- The treatment or a process of treatment must be officially endorsed by the [National Plant Protection Organization](#) (NPPO) of the exporting country;
- The treated packaging must be marked with a universally recognized symbol or another [mark approved by the CFIA](#) prior to any shipments being received.

**Q.8 What will happen to my shipment if the wood packaging materials are not entirely debarked?**

**A.8** Debarking is not required. The wood must be either heat treated or fumigated using methyl bromide.

**Q.9 Methyl bromide treatment is too expensive, what other treatment (s) is/are acceptable?**

**A.9** Acceptable methods of treatment are available in [Appendix 1](#) of D-98-08 (4<sup>th</sup> Revision).

Please note that, in accordance with Canada's ratification of the [United Nations' Montreal Protocol on Substances that Deplete the Ozone Layer](#), the CFIA does not promote the use of methyl bromide. However, methyl bromide is viewed as an effective treatment for mitigating pest incidence in wood packaging and has been adopted internationally as a treatment.

**Q.10 If the imported commodities are shipped on wood packaging originating in the United States only, do I need to meet these new requirements?**

**A.10** Both Canada and the U.S. have agreed not to regulate wood packaging moving between the two countries, but rather to recognize that the existing pest specific regulatory controls already in place as sufficient protection. As such, requirements for treatment will not be applied to Canadian wood packaging moving to the continental United States or vice versa. Such recognition will allow Canada to focus inspection resources on other high risk countries to ensure compliance.

Canadian or U.S. untreated wood that has moved overseas is not eligible to re-enter Canada without treatment. The identity of the wood can not be confirmed and as such must be treated prior to return as wood packaging.

**Q.11 What will happen to my consignment when it enters Canada, if the consignment contains wood packaging?**

**A.11** Canadian Food Inspection Agency staff may order your shipment re-directed to a facility where the commodity may be inspected. Alternatively, CFIA may order your shipment inspected at destination. The inspection staff may order the container or other shipping unit to remain sealed until they are able to inspect it. Upon inspection, the CFIA will determine if the conditions for entry have been met.

Any costs associated with the inspection or with bringing a shipment into compliance with Canadian import requirements is the responsibility of the importer or person in care and control of the regulated article.

**Q.12 If the wood packaging attached to my importation is not compliant, as the importer am I responsible?**

**A.12** The importer or person in care and control of the importation is responsible for the consignment.

**Q.13 If the wood packaging attached to my shipment is not compliant with Canada's new requirements what penalties will be imposed?**

**A.13** For an interim period, Canada will allow the entry of wood packaging that is free of pests and diseases but fails to meet some of the import requirements. Further information concerning Canada's phase-in procedures are located [here](#). Any wood packaging found to be infested will be ordered removed from Canada or treated in a manner that prevents pest escape.

Following the interim period, non-compliant wood packaging will not be permitted entry to Canada and will be ordered returned to its country of origin.

All costs associated with dealing with non-compliant wood packaging is the responsibility of the importer or the person in care and control of the importation.

Canada will provide sufficient warning to trading partners of the date of commencing a policy of strict enforcement.

**Q.14 If I import goods through the United States, then into Canada, does my wood packaging need to comply with the requirements?**

**A.14** Yes, regardless of whether the commodity transits through the United States, wood packaging that is produced in a country other than the United States, must meet Canada's new import conditions.

**Q.15 The United States, has not yet established import requirements similar to those in Canada. If my goods are consigned to the United States, do these need to meet Canada's import requirements?**

**A.15** Yes. The entry of all untreated wood packaging into Canada poses a risk for the introduction of pests. During transit through Canada, infested wood packaging can introduce pests or diseases into Canada's environment.

**Q.16 How does this change affect regulations applying to China and Hong Kong in policy D-98-10?**

**A.16** D-98-08 (4<sup>th</sup> Revision) supersedes D-98-10 (3<sup>rd</sup> Revision), as such imports from China and Hong Kong must meet the requirements of D-98-08 (4<sup>th</sup> Revision).

**Q.17 I both export and import commodities and often my Canadian wood packaging goes offshore and returns to Canada. Do I need to meet these new import requirements?**

- A.17** As an exporter Canadian law requires that you meet the importing countries phytosanitary import requirements. Requirements for the export of certified wood packaging are provided in policy [D-01-05](#).

If you are shipping untreated wood packaging overseas to countries not requiring treatment, the returning wood packaging must meet the requirements specified in the policy. As such, to ensure that the wood has not become infested in the destination country by either direct infestation or by the replacement of some wood, the wood packaging must be treated and certified before return to Canada.

**Q.18 Is ships dunnage regulated?**

- A.18** Yes. Ships dunnage is wood used to brace cargoes aboard a marine vessel. It is considered wood packaging. Vessels may only discharge dunnage compliant with the requirements specified in policy [D-98-08 \(4th Revision\)](#). The responsibility of ensuring that ships dunnage is compliant rests with Canadian berthing facilities and the ships agents in Canada. Should non-compliant dunnage be discharged into Canada, the port facility will be held responsible for ensuring that dunnage is brought into compliance, either through removal from Canada, or during an interim period through appropriate treatment and disposal.

**Q.19 Does D-98-08 (4<sup>th</sup> Revision) regulate wood packaging arriving on all modes of transport?**

- A.19** Yes. All modes of transport are subject to the conditions of the policy: air, rail, ship, road.

**Q.20 I am importing wood packaging from a country that does not have a system in place to meet the standards of Canada's new import requirements. Am I exempt from the requirements?**

- A.20** No. Wood packaging must be compliant with Canada's import requirements. To provide sufficient time for countries to develop certification programs for wood packaging materials, the CFIA, for a short period will permit the entry of wood packaging that has not satisfied all import requirements, provided the wood packaging is free of any pests and diseases. Should pests or diseases be found, quarantine actions will be taken and costs incurred by the action must be borne by the importer or person in care and control of the importation.

**Q.21 I export goods to many countries worldwide. Can I expect similar requirements from other countries?**

**A.21** The [International Standard for Phytosanitary Measures #15 Guidelines for Regulating Wood Packaging moving in International Trade](#). encourages countries to adopt similar import measures to reduce the incidence of unwanted exotic pests moving to new areas. Canada, the United States and Mexico have decided to adopt this International Standard as import measures in 2005. Countries of the European Union have indicated that they, too, will establish revised import regulations in mid-2005. The Republic of Korea, the Peoples' Republic of China, and Australia have given notice that they, too, intend to adopt the recommendations of ISPM #15. New Zealand has already established import rules reflecting ISPM #15.

**Q.22** **I import wine are the wooden barrels regulated?**

**A.22** No. Barrels are considered forest products. Requirements for these are specified in policy [D-02-12](#).

In general, barrels containing spirits are not regulated. Barrels for other purposes are regulated.

**Q.23** **I import specialty woods from all over the world. Is the dunnage attached to the lift of lumber regulated by policy D-98-08 (4<sup>th</sup> Revision)?**

**A.23** Yes, dunnage attached to lumber is regulated in the same way as other wood packaging.

**Q.24** **Who do I contact for further information?**

**A.24** Importers should first contact their exporters to determine if the wood packaging they're using complies with Canada's new requirements. Many countries including most of those in Europe, Australia, Japan, and others, have indicated that they have systems in place to meet Canada's new requirements.

New and detailed information will be placed on this website. Checking back often will ensure that you keep up to date. You can also [subscribe to our listserver](#).

Additionally, you can contact [a local office of the CFIA](#).

**Q.25** **How will CFIA know if my wood packaging is compliant?**

**A.25** CFIA will conduct inspections as a means of verifying compliance. Both tailgate and destuffing inspections will be used. CFIA is currently performing these inspections for wood packaging arriving in all of our major ports.

- Q.26 Will shipments still in transit prior to April 1<sup>st</sup>, but arriving after April 1<sup>st</sup>, 2005 be required to comply with the new policy?**
- A.26** CFIA will be applying the conditions of policy D-98-08 (4<sup>th</sup> Revision) to shipments consigned after April 1<sup>st</sup>, 2005. However, Canada at present regulates wood packaging and will not permit the entry of pests or diseases.
- Q.27 Where carton boxes or other boxes made of material other than wood which are re-inforced on the inside with wooden parts, can the IPPC mark be placed on two exterior sides of the actual box or is the IPPC mark required to be placed on the individual wooden components?**
- A.27** If the wooden components are secured to the carton box (staples, nails, glue, etc) and that the only way that the wood can be taken out is by destroying the carton box, then the mark appearing on the outside of the carton box (2 sides) would be acceptable. The actual treatment and procedures to assure traceability of the reinforcement material would need to be approved by the National Plant Protection Organization before the international recognized mark could be used.

The facility is responsible to assure that all pieces of wood contained in the carton boxes are treated in accordance to ISPM 15.

If the wooden components are not secured within the box (e.g. nailed, glued, stapled or other), then each individual piece which exceeds 6 mm in thickness would be required to be marked with the international recognized mark.

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