

Proposed Changes to the Import Health Standard for Wood Packaging Material from All Countries

New Zealand's import requirements for wood packaging material (WPM) are prescribed in the *Import Health Standard: Wood Packaging Material from all Countries* which was introduced in May 2006. Wood packaging material includes items such as dunnage, crates, fillets, spacers, pallets, drums, and reels.

The requirements in the Import Health Standard (IHS) are based on the International Sanitary and Phytosanitary Measure No.15 Standard (ISPM 15): *Regulating Wood Packaging Material in International Trade*. MAF Biosecurity New Zealand (MAFBNZ) has previously aligned the IHS for wood packaging material with ISPM 15, thereby fulfilling our role as a signatory to the international standard, while also meeting New Zealand's specific biosecurity needs. Currently MAFBNZ requires all wooden packaging material, thicker than 6mm, to be heat treated or fumigated with methyl bromide and stamped with an official ISPM 15 mark; or to be treated using alternative treatments approved by MAFBNZ in the IHS.

MAFBNZ have proposed a number of changes to the IHS, as well as agreed to align the IHS with a revised version of ISPM 15 which was adopted during 2009. A summary of the proposed changes to the Import Health Standard are described below:

1) Inspection of all non-compliant wood packaging

The most significant change to the IHS is the inclusion of the option to inspect all non-ISPM 15 compliant or untreated Wood Packaging Material (WPM). Due to the large volume of consignments that enter New Zealand containing WPM, MAFBNZ does not have the resources to inspect all WPM in containerised cargo. Currently MAFBNZ selects a sample of WPM for inspection and in some circumstances does not undertake additional actions where WPM is declared as not treated or with insufficient ISPM 15 markings.

Surveys conducted by MAFBNZ indicate that WPM, without ISPM 15 markings (i.e. non-compliant), is more likely to be associated with regulated pests and contaminants than wood with ISPM 15 marks¹. Therefore MAFBNZ proposes to begin specifically targeting all containerised cargo consignments that declare non-compliant WPM. WPM that is not marked with an ISPM 15 stamp, or treated and accompanied by a complying treatment certificate, will be inspected by MAFBNZ at the importer's expense. WPM will be given biosecurity clearance if, after inspection, it is found to be free of regulated pests and contaminants.

MAFBNZ believe that these proposed changes to the IHS, while potentially increasing costs to importers of non-compliant material through mandatory inspection, will further reduce the risk of pests and contaminants entering New Zealand on WPM.

2) Tolerance level for debarked wood

Among the changes to ISPM 15, recommended by the International Forestry Quarantine Research Group (IFQRG), was the recognition that small pieces of bark are unlikely to be associated with timber pests and pose minimal biosecurity risk when associated with WPM. The IFQRG recommended a tolerance be placed on small pieces of bark associated with wood packaging material.

¹ MAFBNZ Biosecurity Monitoring Reports:
Monitoring Research and Pathway Review: Sea Containers (BMG 06-07/03), July - September 2006.
Survey of Wood Packaging in FAK Sea Containers (BMG 07-08/03). February - April 2008.

The current IHS requires that all WPM imported into New Zealand is free from bark. WPM found to be contaminated with any bark will either have it removed by an inspector (if possible), or treated, reshipped or destroyed. MAFBNZ have reviewed the findings of the IFQRG and consider the inclusion of a tolerance level for small pieces of bark will not significantly increase the risk from pests associated with wood packaging. The draft IHS states that any number of small and clearly distinct pieces of bark may remain if these are less than 3cm in width, or if wider than 3cm, the total surface area of each bark piece is less than 50cm².

The IFQRG's recommendation was based on information collected from 35 countries, including New Zealand. Most bark pieces on WPM were small and relatively narrow, with few insects found associated with smaller bark pieces. The moisture content and size of bark pieces were found to be important factors in the development of a reproducing population of insects, such as bark beetles. Small pieces of bark less than 50cm² are considered to be not big enough for bark insects to survive and complete their life cycles ².

3) Changes to Other Treatments Approved by New Zealand

A change has also been proposed to the schedule of alternative treatments approved by New Zealand. The approved phosphine fumigation rate has been increased to 3.0 g/m³ for at least 120 hours (5 days) at a temperature of 15°C or above. The increases in the fumigation rate and time of application are based upon results from the latest research on phosphine fumigation efficacy of quarantine timber pests conducted in New Zealand.

Next steps

MAFBNZ welcome submissions from all interested parties on these proposed changes to the Import Health Standard. Submissions should be forwarded to MAFBNZ by **5 October 2009**. We encourage respondents to forward comments electronically to the email address below however, should you wish to forward submissions in writing, please send these to the address below.

Depending on the outcomes of consultation, MAFBNZ anticipate any changes to the Import Health Standard will be fully implemented by **1 November 2009**. We encourage importers to ensure that all Wood Packaging Material destined for New Zealand is compliant with ISPM 15 prior to this date.

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² Haack, R.A. and Petrice, T.R. (2009) Bark and Wood-Borer Colonization of Logs and Lumber after Heat Treatment to ISPM 15 Specifications: The Role of Residual Bark. *Journal of Economic Entomology* 102(3): 1075-1084.