

REVIEW OF SUBMISSIONS - IMPORT HEALTH STANDARD: WOOD PACKAGING MATERIAL FROM ALL COUNTRIES

The draft import health standard and document outlining the proposed changes for Wood Packaging Material from All Countries was notified on the MAF Biosecurity New Zealand website www.biosecurity.govt.nz on 8 September 2009.

5 formal submissions were received during the consultation period. In addition, informal correspondence on the proposed changes was received from several other interested parties.

| Submitters | Date Received |
|--|----------------------|
| Hans-Russ Hofmans | 8/9/2009 |
| Roddie Burgess (Forestry Commission, UK) | 8/9/2009 |
| Mark Ross (Ryders) | 22/9/2009 |
| NZ Forest Owners Association | 5/10/2009 |
| Laura Scandurra (US Department of Agriculture) | 8/10/2009 |

If you wish to see a copy of the full submissions, please contact the Plant Imports Team, Border Standards, MAF Biosecurity New Zealand; email: plantimports@maf.govt.nz or phone (04) 894 0460.

Submissions

1. Hans Russ-Hofmans

The original ISPM 15 standard recognises heat sterilisation as an option e.g. killing off hitchhikers at the time of application. It also recognises in doing this the WPM needs to also comply with any other bilateral trade arrangements and/or any special Phytosanitary Measures required by the Importing Country e.g. as defined on Import Permits. This also recognises that there is often a length of time between sterilising the timber and when it is used for export (risk of re-infestation and growth of moulds and fungi etc). I hope this could be made clearer.

MAFBNZ responds: This IHS contains the ISPM 15 requirements as well as any special phytosanitary measures required by NZ as the importing country. Heat treatment needs to be certified by the ISPM 15 mark or on a treatment certificate. The ISPM 15 requirements accepted the potential length in time that could occur between treatment and export. However ISPM 15 considers that this risk is much lower for wood packaging that has been treated sufficiently and is free from significant pieces of bark.

2. Roddie Burgess (DEFRA, United Kingdom)

The definition of heat treatment has been modified in the revision of ISPM 15 to recognise that certain procedures, microwave especially, will result in hotter temperatures being achieved in the core of the wood before the surface temperature reaches the same temperature. It was also recognised that it was necessary to clarify that the exposure time should not be interrupted for any reason whereby the required temperature may not be held at or above the required 56°C. I would therefore ask that you consider replacing the existing text with the new wording as it appears in the revision: "Wood packaging material must be heated in accordance with a specific time-temperature schedule that achieves a minimum temperature of 56°C for a minimum duration of 30 continuous minutes throughout the entire profile of the wood (including at its core)" (Annex 1, ISPM 15 revised 2009)

MAFBNZ responds: Comment noted. The revised IHS will include the new wording that appears in the ISPM 15 revision.

3. Mark Ross (Ryders)

With MAF having trained Accredited Persons, we cannot see why these persons cannot make a decision on the wood used in packaging material and if it is acceptable. If there is any doubt they would call MAF as per procedure statement. MAF need to think of the costs that are involved in their procedures and what real benefit is gained from adding increased costs to imported goods.

MAFBNZ responds: Accredited Persons have a significant responsibility at MAF-approved Transitional Facilities for reporting on biosecurity risks associated with wood packaging material (WPM) and this will not change. However, MAFBNZ believe it is important to take ownership for inspection over the small proportion of WPM that is immediately identified as non-compliant or untreated upon entry into NZ. There will continue to be a very large number of containers containing wood packaging that will enter MAF-approved facilities around the country and require Accredited Persons to ensure that any biosecurity risks are dealt with effectively for these consignments. MAFBNZ anticipate that communications on these changes, and the revised import requirements themselves, will ensure that there is a significant decline in the instances of non-compliant wood packaging and potential biosecurity risks within the next year.

4. NZ Forest Owners Association

The FOA is very concerned over the admission in section (1) of the document “Proposed changes to the IHS for Wood Packaging...” where it states that MAFBNZ “in some circumstances does not undertake additional actions where WPM is declared as not treated or with insufficient ISPM 15 markings”. However, it is pleasing to note that this position is to be rectified by “specifically targeting all containerised cargo consignments that declare non-compliant WPM” and that the importer will have to pay for the inspection costs. We strongly support this proposal.

MAFBNZ responds: Comment noted. As stated above, MAFBNZ believed it was important to take ownership for inspection over the small proportion of WPM that is immediately identified as non-compliant or untreated upon entry into NZ. It is anticipated that potential costs for inspection will quickly reduce the future number of consignments that may contain non-compliant or untreated WPM.

It is noted that once inspected, WPM will be given biosecurity clearance if it is found to be free of “regulated pests and contaminants”. Our understanding is that a “regulated pest” is “officially controlled”. While soil would be an obvious contaminant, it is not clear where fungi (such as obvious fruiting bodies or hyphae) fit in this classification as in most cases they cannot be accurately identified without expensive lab tests and they generally wouldn’t be classified as a “regulated pest”. The question then, is what happens if WPM is found with obvious fungal contamination?

MAFBNZ responds: Specific fungi are considered to be regulated species on commodities such as WPM. If WPM is found with obvious fungal contamination, the importer is given the option of identification, treatment, reshipment or destruction. If the fungi cannot be identified sufficiently, the options of treatment, reshipment or destruction are available to the importer.

Should there not be a requirement in the IHS to indicate the date that WPM has been treated? This would be an indication of how likely the treatment (e.g. drying) is still effective against biosecurity pests.

MAFBNZ responds: The ISPM 15 requirements accepted the potential length in time that could occur between treatment and export. In the development of ISPM 15, treated wood was considered to be of a much lower risk of re-infestation if it has been treated sufficiently and is free from significant pieces of bark.

The revised IHS for Wood Packaging proposes phosphine treatment as an alternative to heat treatment or methyl bromide “based on results from the latest research on phosphine fumigation efficacy of quarantine timber pests conducted in New Zealand”. We are opposed to this proposal, based on MAF’s own report, <http://www.maf.govt.nz/sff/about-projects/search/08-061/phosphine-research-review.pdf> which states:

“Phosphine is highly toxic to insects and is known to penetrate treated materials. Phosphine has replaced many MB applications for treatment of durable materials where its slower action on pests can be managed successfully. Phosphine is generally ineffective against fungi.”

We understand that in the current version of the IHS, MAF has also allowed the use of phosphine as an alternative treatment. We don’t support this. Fungi and phytophthora as well as other organisms cannot be effectively killed by phosphine treatment and therefore phosphine should not be proposed as an alternative to heat treatment or methyl bromide. It is also noted in Appendix 3 of the draft IHS that boron is proposed as an alternative treatment, despite the acknowledgement that it has limited fungicidal properties. FOA is opposed to this recommendation as well, and questions why NZ should move away from the recommended treatments outlined in ISPM 15.

MAFBNZ responds: Comment noted. New Zealand’s IHS is not moving away from the ISPM 15 treatments, but instead we are continuing to offer treatment alternatives given the need to

encourage the reduction of methyl bromide use, as well as address concerns over the possibility of insufficient capacity to heat treat all wood packaging both in NZ and overseas. This will continue to be an issue until there is a set of alternative quarantine treatments for wood packaging other than methyl bromide included in ISPM 15. None of the treatments listed in ISPM 15 are currently approved by MAFBNZ to be highly effective against fungi, as the MAFBNZ-approved heat treatment rate for fungi is 70°C for 4 hours. However, the treatments that have been included in ISPM 15 and the IHS will practically eliminate the risk for most quarantine pests and significantly reduce the risk from a number of other pests or contaminants that may be found on WPM. The only change being proposed to the alternative treatments is to increase the fumigation rate of phosphine because of concerns over the effectiveness of the rate listed in the previous IHS. The increase in the phosphine rate is based on the latest information we have available, and has been expanded further from the draft IHS to allow for a more sustained period of application across different temperatures of application.

5. Laura Scandurra (US Department of Agriculture)

The change in Section 4.3.2 to encompass the recent debarking changes listed in ISPM 15 should be commended. It is reassuring to see that the research efforts of the international community were able to develop a tolerance which was acceptable to such a delicate ecosystem.

MAFBNZ responds: Comment noted. Section 3.1.1 of the IHS still encourages wood packaging to be bark-free, but allows for the ISPM 15 adopted tolerance for small pieces of bark.

The list of exemptions in Section 2.1.3 does not list “wood components permanently attached to freight vehicles and containers”, found in Section 2.1 of the revision of ISPM 15 (2009). The United States would like clarification whether this is an oversight or a deliberate omission.

MAFBNZ responds: Comment noted. This exemption will be included in Section 2.1.3 of the final IHS.

The guidelines in Appendix 2 still state, “The mark must at minimum include”, which is inconsistent with the revision of ISPM 15 (2009) which states that, “No other information shall be contained within the border of the mark”. Also the acceptable variants, which are now permissible under the new revisions, are not represented. The United States would like clarification whether these are oversights or deliberate omissions.

MAFBNZ responds: Comment noted. The statement “no other information shall be contained within the border of the mark” has been included in the final IHS.