SUBMISSIONS TO DRAFT – TECHNICAL REQUIREMENTS: REGISTERED CERTIFICATION MARK (ISPM 15)

Biosecurity Draft: 3.1 Application of the registered certification mark

iii. placed in a clearly visible location on at least 2 sides of the article being approved. (Note: On pallets, this could be on the inner faces of the blocks as these are more visible to an inspector when looking inside a container or anywhere else where pallets are stacked).

By omitting the word ‘preferably’, the proposed Biosecurity Standard would make it mandatory to place two marks on each item, despite ISPM15 only requiring one mark. Most pallets we manufacture have bearers rather than blocks, and one mark, correctly placed, should suffice.

ORIGINAL ISPM 15 TEXT

- placed in a visible location, preferably on at least two opposite sides of the article being certified.

Submission: It is Timpack’s position that this is an unnecessary change, and that the word ‘preferably’ should be retained.
Biosecurity Draft: 3.1 Application of the registered certification mark

The registered certification mark shall not be used for any other purposes such as advertising or on company stationery.

Submission: It is Timpack’s position that this requirement should be removed. The IPPC Mark an international mark and it is already in widespread use throughout the participating countries. ISPM 15 does not impose this requirement, and as the mark is not owned by MAF, this requirement seems onerous and unnecessary.

Yours sincerely

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