Plant Export Requirement

MPI Technical Standard: Certification Mark for Wood Packaging

30 March 2015

TITLE

Plant Export Requirement: MPI Technical Standard: Certification Mark for Wood Packaging

COMMENCEMENT

This Plant Export Requirement comes into force on the 1st June 2015.

ISSUING AUTHORITY

This Plant Export Requirement is issued

Dated at Wellington this 2015

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Ministry for Primary Industries

(acting under delegated authority of the Director General)

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Introduction

This introduction is not part of the Plant Export Requirement, but is intended to indicate its general effect.

Purpose

To specify the minimum technical requirements for the application of the ISPM 15 certification mark to wood packaging material and the ongoing management of wood packaging material that bears the certification mark on behalf of Ministry for Primary Industries (MPI).

Background

MPI has developed a series of operating standards to manage the export certification of plant and plant products. The series of plant export certification standards can be found on the MPI website.

The MPI regulatory model for plant exports operates through authorised Independent Verification Agencies (IVAs) and MPI approved organisations (MAOs) undertaking services on MPI's behalf.

This standard specifies the minimum requirements for organisations when using the ISPM 15 certification mark including the International Plant Protection Convention (IPPC) symbol, a registered trade mark in New Zealand.

Who should read this Plant Export Requirement?

This standard applies to organisations seeking MPI approval to apply the ISPM 15 certification mark to wood packaging and to organisations seeking MPI approval to construct or alter wood packaging already bearing the mark.

This standard applies to wood packaging such as crates, boxes, packing cases, dunnage, pallets, cable drums and spools/ reels, which can be present in almost any export consignment, including consignments that would not normally be subject to phytosanitary inspection.

The following articles are of sufficiently low risk to be exempted from the provisions of this standard:

- a) wood packaging material made entirely from thin wood (6 mm or less in thickness):
- wood packaging made wholly of processed wood material, such as plywood, particle board, oriented strand board or veneer that has been created using glue, heat or pressure, or a combination thereof;
- c) barrels for wine and spirit that have been heated during manufacture;
- d) gift boxes for wine, cigars and other commodities made from wood that has been processed and/or manufactured in a way that renders it free of pests;
- e) sawdust, wood shavings and wood wool;
- f) wood components permanently attached to freight vehicles and containers.

Why is this important?

Operating other than in accordance with this standard may result in MPI not providing certification for exports of plant and plant products.

Wood packaging that is not ISPM 15 compliant may be directed for treatment re-export or destruction by importing countries requiring ISPM 15 compliance.

Document history

Previous	Current	Section	Change(s) Description
Version Date	Version Date	Changed	
5 March 2010	25 March 2015	Whole document	Full review and reissue of this standard.

Other information

MPI Certification Standard: Assurance System Framework;

- Appendix 1: References
- Appendix 2: Definitions

International standards for phytosanitary measures: ISPM No. 15 Regulation of Wood Packaging Material in International Trade (2009).

Trade Marks Act 2002.

Part 1: MPI Principles for the use of the Certification Mark

- (1) The IPPC certification symbol is a registered trade mark in New Zealand.
- (2) MPI is authorised to approve IVAs and MAOs to use the IPPC certification symbol as part of the ISPM 15 certification mark.
- (3) The use of the registered IPPC symbol (or a deceptively similar mark) on wood packaging in New Zealand by those not approved by MPI under this standard is an infringement of the Trade Marks Act 2002.
- (4) The certification mark must only be applied to wood packaging material:
 - a) by an IVA or MAO with the appropriate scope of approval;
 - b) that has been officially treated in compliance with ISPM 15.
- (5) Wood packaging material units that bear the certification mark must only be structurally altered by an IVA/MAO as per this standard.
- (6) Wood packaging material that is not structurally altered and bears the certification mark may be reused without restriction for the service life of the wood packaging unit.

Part 2: General Requirements

- (1) Organisations seeking MPI's approval to apply the certification mark to treated wood packaging material, or alter wood packaging material that bears the certification mark must:
 - a) be either an authorised IVA or MAO;
 - b) implement documented procedures for the application of the certification mark (refer to Part 2.1) and/or altering wood packaging bearing the mark (e.g. manufacturers, repairers and remanufacturers of wood packaging units). Refer to Part 2.2.

Guidance

- The process for MPI authorisation of IVAs and the requirement for documented procedures are described in MPI Certification Standard: IVA Requirements.
- The process for MPI approval of MAOs and the requirement for documented procedures are described in MPI Certification Standard: Organisation Requirements.
- All IVA/MAO sites that apply the certification mark will be assigned a registration number and their details will be posted on the MPI register of certified mark applicators.
- This MPI register is available on the MPI web site: http://www.mpi.govt.nz/

2.1 Application of the certification mark

- (1) Organisations that apply the mark must document and implement procedures which describe how:
 - they confirm the certification mark is applied only to wood packaging material that has been officially treated in accordance with Annex 1 of ISPM 15;
 - b) they apply the mark;
 - c) non-compliant wood packaging material is managed to ensure it does not bear the certification mark.
- (2) Example(s) of the certification mark(s) that the organisation is seeking approval to apply must be included in their documented system. The examples must:
 - a) meet the specifications for the certification mark (refer to Part 2.1.1);
 - b) closely resemble the marks applied to wood packaging by the organisation;
 - c) be provided for each treatment code that the organisation is seeking approval to use;
 - d) represent the unique mark applicator code as '000' or as the number assigned to the organisation by MPI.

2.1.1 Specifications for the certification mark

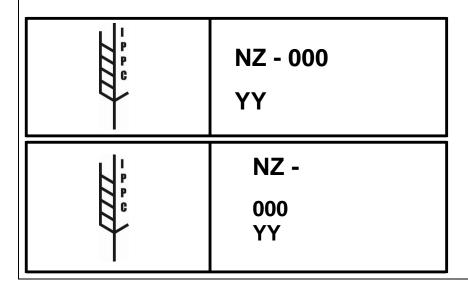
- (1) The certification mark must include:
 - a) the IPPC certification symbol, presented to the left of the other components and closely resembling the examples illustrated in the following guidance;
 - b) the two letter country code 'NZ' for New Zealand separated from the treatment supplier code by a hyphen;
 - c) the unique mark applicator code issued to the organisation by MPI;
 - d) the appropriate treatment code (refer to Table 1).

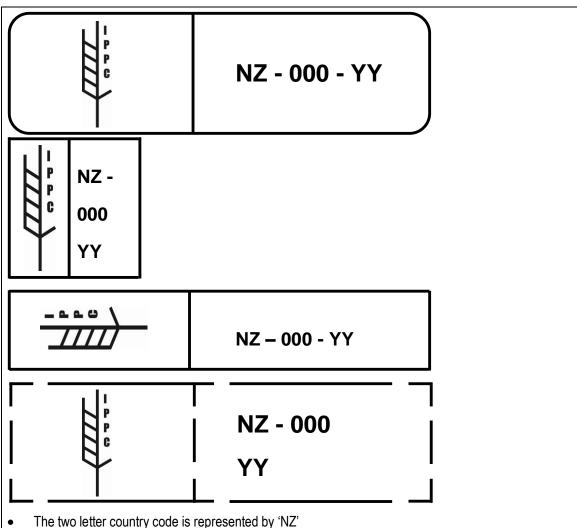
Table 1	ISPM 15 compliant treatments
Treatment code	Treatment type
HT	Heat treatment using a conventional steam or dry kiln heat chamber
DH	Heat treatment using dielectric heating
MB	Methyl bromide

- e) The treatment code must appear:
 - i) after the combined country and producer/treatment provider codes;
 - ii) on a separate line from the country code and producer/treatment provider code, or be separated by a hyphen if presented on the same line as the other codes.
- (2) The certification mark must be:
 - rectangular or square in shape and contained within a border line with a vertical line separating the IPPC symbol from the code components;
 - i) information contained within the borders of the mark must only be that specified above in Part 2.1.1 (1).
 - b) sufficient size to be both visible and legible without the use of a visual aid.

Guidance

- The following are examples of some acceptable variants of the required components of the IPPC registered certification mark.
- The size, font types used and position of the certification mark approved by MPI for use by the organisation may vary.
- To facilitate the use of stencilling, small gaps in the border, the vertical line, and elsewhere among the components of the mark, may be present.
- Additional marks (e.g. trademarks of the producer) may be provided adjacent to but outside of the border of the mark.





- The unique mark applicator code is represented by '000'
- The treatment code is an IPPC abbreviation for the approved measure used and shown in the examples as 'YY'.

2.1.2 Applying the mark

- When applying the certification mark to wood packaging the mark must: (1)
 - a) be durable (permanent) and not transferable;
 - closely resemble the examples shown in the organisation system and be neither hand drawn nor b) red or orange in colour:
 - be clearly visible when the wood packaging unit is in use;
 - be applied on at least two opposite sides of the wood packaging unit unless otherwise agreed with MPI;
 - only be applied by staff listed in the organisation's register of competent staff, or staff operating under direct line of sight supervision of a competent person listed in the organisation's register of competent staff.

Guidance

- The mark may be applied to the processed wood material components of composite units made of both wood treated in compliance with this standard and processed wood material exempted under this standard to ensure that the mark is in a visible location and is of a sufficient size.
- Options for marking dunnage that is not cut to final length include:

- Application of the mark to pieces of wood intended for use as dunnage along their entire length at very short intervals.
- Application of the mark to dunnage treated in compliance with ISPM 15 in a visible location after cutting, provided that the applicator is appropriately approved to apply it.

2.1.3 Debarked wood packaging material

- (1) The wood packaging material must be debarked prior to applying the mark:
 - a) any number of visually separate and clearly distinct small pieces of bark may remain if they are;
 - i) less than 3 cm in width (regardless of the length); or
 - ii) greater than 3 cm in width, with the total surface area of an individual piece of bark less than 50 square cm.
 - b) bark must be removed prior to methyl bromide fumigation.

2.1.4 Security of application devices

- (1) Devices used to apply the certification mark must be:
 - a) protected from misuse including secure storage of them when not in use;
 - b) used only by competent staff.
- (2) The organisation must maintain an application device register that:
 - a) uniquely identifies each device;
 - b) records when each device is first put into service;
 - c) records when each device is put out of service and how the device was destroyed or rendered permanently unusable.

2.1.5 Records

- (1) In addition to the requirements set out in the MPI Certification Standard: IVA or Organisation Requirements, the following records must be kept:
 - a) registration number assigned to the organisation by MPI;
 - b) treatment records:

Examples of treatment records include:

- Treatment certificates from an MPI approved treatment supplier.
- Treatment certificate or Declaration of Conformity (DOC) from an MAO approved to undertake treatments.
- A phytosanitary certificate relating to imported ISPM 15 compliant treated timber.
 - c) records that demonstrate traceability from mark application back to official ISPM 15 compliant treatment;
 - d) application device register as per Part 2.1.4 (2).

2.1.6 Staff competency

- (1) In addition to the general staff competency requirements and competency assessment procedures specified in the MPI Certification Standard: Organisation Requirements, staff who are responsible for the application of the certification mark to wood packaging material must demonstrate:
 - a) an understanding of MPI approved procedures;
 - b) that they operate in accordance with MPI approved procedures:
 - c) ability to differentiate between marks that comply with certification mark specifications and those that do not:

- d) comprehension of what the treatment code(s) stand for (refer to Table 1);
- e) ability to correctly determine compliance with bark tolerances.

2.2 Altering wood packaging

2.2.1 Manufacturers

- (1) Organisations manufacturing (i.e. constructing) wood packaging units that bear the mark must meet the requirements of Part 2.1.
- (2) Organisations must describe in their procedures how they manage the integrity of the finished units to ensure only ISPM15 treated timber is used.

Guidance

- Wood used as dunnage becomes non-compliant if it does not bear the appropriate marks.
- Organisations using ISPM 15 compliant timber for dunnage may do so without MPI approval.

2.2.2 Repairers

- (1) Organisations repairing wood packaging units already bearing the certification mark must document procedures that describe how:
 - a) the wood packaging unit to be repaired is assessed as:
 - i) being ISPM 15 compliant;
 - ii) needing no more than one third of its components replaced;
 - iii) bearing no more than two different certification marks so that the repaired unit bears no more than three different certification marks.
 - b) the scope of MPI approval of each treatment supplier/ MAO is confirmed;
 - c) every component used in the repair is officially treated in accordance with ISPM 15 and bears the certification mark including the treatment code applied to the component.

Guidance

- Certification marks are not considered to be different if they are similar in appearance and have the same country code, treatment code and unique producer/ treatment provider code.
- Repaired ISPM 15 compliant wood packaging material may have previous marks obliterated (e.g. by covering with paint or grinding).
- Wood packaging that has more than one third of its components removed and replaced is considered to be remanufactured (refer to Part 2.2.3).

2.2.3 Remanufacturers

- (1) Organisations remanufacturing wood packaging already bearing the certification mark must document procedures that describe how:
 - the wood packaging unit is assessed as needing more than one third of its components replaced;
 - b) any existing certification marks are permanently obliterated (e.g. by covering with paint or grinding);
 - the remanufactured wood packaging unit is re-treated in accordance with ISPM 15 before the certification mark is applied anew.
- (2) Organisations remanufacturing wood packaging units and re-applying the certification mark must also gain MPI approval to apply the mark (refer to Part 2.1).