

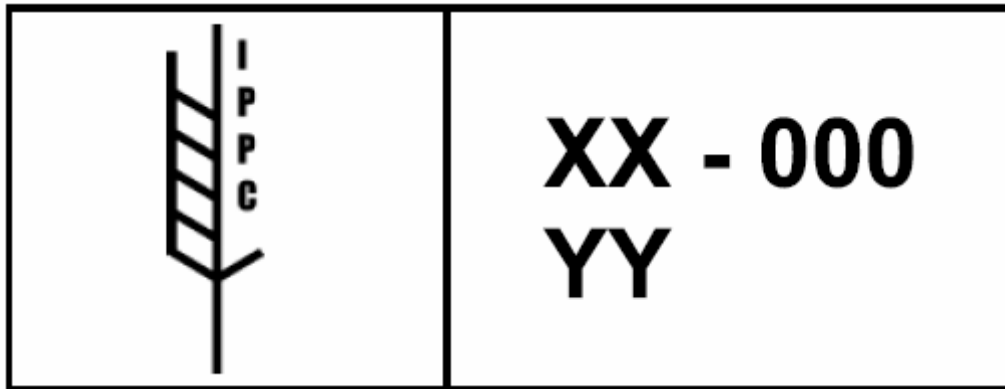
**The plant Protection Advisor  
To the Govt. of India,  
Directorate of Plant Protection,  
Quarantine & Storage, NH – IV,  
Faridabad, - 121 001, (Haryana)**

Dear Sir,

Sub: International Standards for Phytosanitary Measures: 15 – Guidelines and its implementation in India.

Our Association would like to invite your attention to the latest “Guidelines for Regulating Wood Packaging Material in International Trade” by the Secretariat of the International Plant Protection Convention, FAO of UN, Rome, 2002. A copy of the said Guidelines is also enclosed with this letter for your ready reference.

Annexure II of these Guidelines has made it mandatory that after fumigation of wood packaging material, it should be marked / stamped with specific symbol as following:



The mark should at minimum include the:

1. Symbol
2. ISO two letter country code ( XX ) followed by a unique number ( 000 ) assigned by the NPPO to
3. The producer of the wood packaging material, who is responsible for ensuring appropriate wood is used and properly marked
4. IPPC abbreviation (YY) according to Annex I for the approved measure used (e.g. HT, MB).

5. NPPOs (National Plant Protection Organisation of the country), producers or suppliers may at their discretion add control numbers or other information used for identifying specific lots. Where debarking is required the letters DB should be added to the abbreviation of the approved measure. Other information may also be included provided it is not confusing, misleading, or deceptive.
6. Markings should be: according to the model shown here, legible, permanent and not transferable, placed in a visible location, preferably on at least two opposite sides of the article being certified.

Since, In India the Directorate represents as National Plant Protection Organisation of our country, our member PCO's have applied to the directorate taking initiative and assigning a single identification number for our member PCO's.

In the absence of this we are not able to carry out fumigation of wooden packaging material which accompanies the export produce out of our country. Due to this the export trade is being affected and shippers are made to pay hefty fees for fumigating the containers at the port of discharge and or face fines.

We once again request you to please take a decision on the allotment of unique three figure number to our member PCO's so that it would be easy for us to fulfill the requirement of our Exporter clients and affix the stamp on all wooden packaging material after the fumigation is complete and fumigant is ventilated.

We also enclose a copy of legal provision made by Austria in this respect.

For your information these Guidelines are available on website of International Plant Protection Convention and the link is as follows:

[ISPM # 15: Guidelines for regulating wood packaging material in international trade](#)

<http://www.ippc.int/servlet/CDSServlet?status=ND0xMzM5OS4xNjI1OSY3PWVuJjYxPXB1YmxpY2F0aW9ucyY2NT1pbmZv>

We request you to allocate the number urgently so that we can continue the fumigation uninterrupted and help facilitate export trade of our country. Thanking you with regards

For Indian Pest Control Association

President

**Excerpt of the Ordinance 463 by the Federal Minister of Agriculture, Forestry, Environment and Water Management, amending the Plant Protection Ordinance, concerning wood packaging material**

Based on §§ 4 Par. 4, 6, 14, Par. 2, 35 Par. 1, 4 and 6 and 38 Par. 1 of the Plant Protection Act of 1995, Fed. Law Gazette No. 532, last amended in Federal Law Gazette I No. 78/2003, the Federal Minister of Agriculture, Forestry, Environment and Water Management – in concert with the Federal Minister of Finance with regard to Annex 5 – herewith orders:

The Plant Protection Ordinance, Fed. Law Gazette No. 253/1996, last amended by Ordinance in Fed. Law Gazette II No. 193/2003, shall be amended as follows:

1. *The following § 6a with title shall be inserted after § 6:*

**“Labelling of Wood packaging material**

**§ 6a.** (1) The labelling of Wood packaging material shall comply with the specimen as shown in Annex 6.

(2) The labelling shall include the following:

1. the symbol (left-hand figure in Annex 6, word and pictorial mark with the wording “IPPC”) protected by the FAO (United Nations Food and Agriculture Organisation);
2. the ISO country code (AT), followed by an attributable number assigned to the producer or treater of the Wood packaging material, who is responsible for making sure that properly labelled wood is used, by the competent authority as set out in § 35 of the Plant Protection Act of 1995 (right-hand figure in Annex 6, top line);
3. abbreviation for the recognised measure that is applied (right-hand figure in Annex 6, bottom line);
  - a) HT for heat treatment,
  - b) KD for kiln-drying,
  - c) CPI for chemical pressure impregnation,
  - d) MB for methyl bromide, or
  - e) DB for debarking.

(3) Producers or treaters may add control numbers or other information for the identification of certain lots. Other information may be included, provided such information is not confusing, misleading or deceiving.

(4) The labelling

1. must be legible, permanent and non-transferable,
2. must be attached in a visible manner, preferably on at least two opposite sides of the wood for packaging that is to be labelled, and
3. must not be in the colours red or orange.

Recycled, reprocessed or repaired wood for packaging must be labelled again, whereby all the components of such wood for packaging must have been treated.

(5) In application of the measures listed in par. 2 (3), the following requirements must be met:

1. HT: Heat treatment is the process by which a good is heated until it reaches a minimum temperature for a minimum period of time; thereby it must be ensured that a minimum core temperature of the wood for packaging of 56°C is achieved for at least 30 minutes by applying a specific time-temperature programme;

2. KD: Kiln-drying is a process in which the wood is dried in a closed kiln by applying heat or controlling moisture; thereby it must be ensured that the result of treatment required for heat treatment as set out in subparagraph 1 above is achieved;
3. CPI: Chemical pressure impregnation is a process in which the wood is treated with a chemical preservative under a specific pressure; thereby it must be ensured that the result of treatment required for heat treatment as set out in subparagraph 1 above is achieved by using steam, hot water or dry heat;
4. MB: Fumigation is a process in which a type of good is treated with a chemical agent that is completely or mainly in its gas state; when fumigating with methyl bromide in a closed room, the following minimum standard must be complied with:
  - a) The minimum temperature must not be below 10°C;
  - b) the minimum treatment time must not be below 16 hours;
  - c) the following dosages must be observed:

Temperature	Dosage (g/m <sup>3</sup> )	Minimum concentration (g/m <sup>3</sup> ) after:			
		0.5 h	2 h	4 h	16 h
21°C or higher	48	36	24	17	14
16°C or higher	56	42	28	20	17
11°C or higher	64	48	32	22	19

5. DB: Debarking is a process in which the bark is removed from round wood, whereby the wood is not necessarily rendered completely free of bark; in the debarking process all bark with the exception of the bast tissue, ingrown bark around knots and bark pockets between growth rings must be removed."

2. The following § 6b with title shall be inserted:

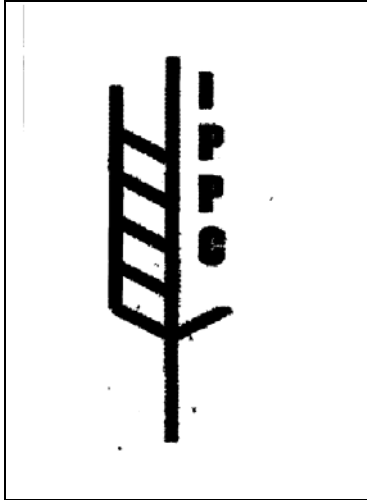
**“Certification of Treatment**

**§ 6b.** The form sheet as set out in Annex 7 shall be used to certify that treatment of wood for packaging has been performed as set out in § 35 of the Plant Protection Act 1995.”

Annex 6

**Specimen for Labelling of Wood for Packaging**

The specimen label figured below confirms that the wood for packaging bearing the label has been subjected to a recognised method of treatment.



AT – 000  
XX

12. The following Annex 7 shall be inserted:

*“Annex 7*

#### Certification of Treatment of Wood for Packaging

.....  
(Name/company)

herewith confirms as set out in § 35 of the Plant Protection Act of 1995 that the following packaging material

.....  
..... (type and quantity of wood for packaging), which is enclosed with the consignment

.....  
(number and date of bill of delivery or invoice),  
to

.....  
(Name/company)

has been subjected to the following treatment as set out in § 6a Par. 5, Plant Protection Ordinance.

- Heat treatment (HT)
- Kiln-dried (KD)
- Chemical pressure impregnation (CPI)
- Methyl bromide (MB)
- Debarking (DB)

.....  
(Date)

.....  
(Official signature)

## **Basic legal provisions, laid down in § 35 of the Plant Protection Act of 1995 (Federal Law Gazette No. 532, last amended in Federal Law Gazette I No. 78/2003)**

### **Requirements for the export of wood packaging material**

§ 35. (1) If, for the purpose of exports to third countries, labelling according to internationally recognised phytosanitary standards is required for wood which, in the form of dunnage, stack wood, palettes or packaging material is in fact used in transporting all kinds of objects, enterprises intending to perform such a labelling shall apply with the Provincial Governor (“Landeshauptmann”) for entry into an official register. For the application a form to be specified by ordinance of the Federal Minister for Agriculture, Forestry, Environment and Water Management shall be used.

(2) The Provincial Governor shall enter the enterprise into the official register if it is able to observe the obligations set forth in para. 5 or 6. If the conditions of entry have been fulfilled, the application is to be granted subject to terms and conditions laid down in para. 5 or 6. The entry into the official register shall be performed under an individual registration number which makes it possible to identify the enterprise concerned. Entry into the official register includes the right of the enterprise concerned to perform labelling according to para. 1, subject to the relevant terms and conditions. Entry shall be refused or cancelled if the requirements therefor are not, or no longer, fulfilled.

(3) The Provincial Governor shall inspect the enterprises regularly at appropriate times, but at least once per year, and check their compliance with the requirements, in particular with those of paragraphs 5 and 6.

(4) For the implementation of legal provisions of the European Community or of international agreements the Federal Minister for Agriculture, Forestry, Environment and Water Management shall lay down by ordinance

1. which data the labelling has to contain according to para. 1 and
2. which other requirements the labelling has to fulfil according to para. 1.

(5) Enterprises which treat wood in the form of dunnage, stack wood, palettes, or packaging material that is in fact used in transporting all kinds of objects and that requires labelling according to para. 1 in compliance with recognised international phytosanitary standards must have the appropriate facilities necessary to treat the wood expertly, in particular the facilities for heat treatment or kiln-drying. The enterprises shall furnish proof of the proper functioning of these facilities in regular intervals to be laid down in the administrative ruling according to para. 2.

(6) Enterprises which produce or recover, but do not themselves treat, wood in the form of dunnage, stack wood, palettes, or packaging material that is in fact used in transporting all kinds of objects and that has not yet been labelled according to para. 1, shall, so as to be permitted to perform the labelling pursuant to para. 1, provide the confirmation of an enterprise according to para. 5 stating that the treatment is performed expertly. This confirmation shall inform about the quantity of wood treated and must not have been issued earlier than one month before the wood treated is to be labelled. Enterprises according to paragraphs 5 and 6 shall preserve the confirmations for at least one year and shall keep records of them. For the confirmation a form to be specified by the Federal Minister for Agriculture, Forestry, Environment and Water Management has to be used.

(7) Within the framework of an official control system required under internationally recognised phytosanitary standards also the official bodies according to section 3, para. 1, item 1, may carry out examinations. The official bodies according to section 3, para. 1, items 2 and 3, shall be informed about the performance of examinations.

## The Austrian legal provisions concerning Wood Packaging Material

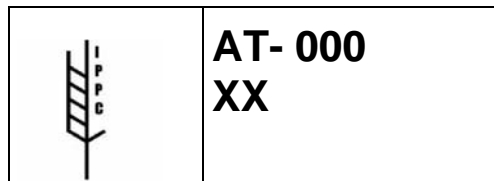
Effective October 2003, the Federal Ministry of Agriculture, Forestry, Environment and Water Management has established new Regulations concerning the treatment and marking of Wood Packaging Material. These regulations are in line with the requirements as set out in the *International Standards on Phytosanitary Measures no. 15: Guidelines for Wood Packaging Materials in International Trade, FAO, Rome 2002* (ISPM No.15).

The Austrian legal provisions are laid down in the governmental Ordinance no. 463 of 3 October 2003 based upon § 35 of the Plant protection Act (see attachment).

To obtain the necessary certification, Austrian companies wishing to use the internationally recognised and protected mark must be registered and authorised by the appropriate provincial governor.

### Marking

Only registered companies are authorised to use the following mark on wood packaging materials:



In this mark, for 000 will be inserted the unique registration number assigned by the competent austrian authority to the actual certified company placing the mark. The dimension of the complete mark should be preferably 65 mm by 65 mm to 70 mm by 70 mm, but at least be legible. The marking must be permanent and non transferable. It must be attached in a visible manner, preferably on at least two opposite sides of the unit, and must not be in the colours red or orange.

The treatment codes are to be put into the "xx" spot under this marking scheme. In a possible third line of the mark text, the company may add control numbers or other information, provided such information is not confusing, misleading or deceiving.

### Company categories

Two company categories may apply for registration and authorisation:

A: Companies carrying out treatment of wood for packaging material;

B: Companies producing (including recycling, reprocessing or repairing) wood packaging material who do not treat the wood packaging material themselves.

### **Requirements for the registration and authorisation of companies**

Upon applying, companies must be able to observe certain requirements laid down by the competent authorities:

*For category A:* that the company must have the appropriate facilities necessary to treat the wood expertly. The company shall furnish proof of the proper functioning of the facilities in regular intervals to be laid down in the administrative act granting authorisation.

*For category B:* that all pieces of wood used for wood packaging materials to be marked has been treated as specified in ISPM No.15 and that each unit of wood packaging material is marked as required. The company shall, so as to be permitted to perform the labelling provide the confirmation of a company (category A) that the treatment was performed expertly. This confirmation shall inform about the quantity of wood treated and must not have been issued earlier than one month before the wood treated is to be labelled.

*For both categories:* the company of category A as well as the company of category B shall preserve the confirmations for at least one year and shall keep records of them.

### **Audit and inspection by the competent Austrian Plant health authorities**

Upon application by the company, the company is entered into an official register and authorised according to the appropriate legal provisions subject to terms and conditions laid down by the competent authorities.

The entry into the official register shall be performed under an individual registration number which makes it possible to identify the company concerned. Entry into the register shall be refused or cancelled if the requirements laid down by the competent authority are not, or no longer fulfilled.

The competent authority shall inspect the company regularly at appropriate times, but at least once a year and check their compliance

with the requirements laid down by the competent authority in the administrative act granting authorisation to the company.

Within the framework of the official audit and control system also the official bodies on federal level are entitled to perform checks at the companies.

**In conclusion**, the Austrian legal provisions concerning Wood Packaging Material ensure that wood packaging material marked with the internationally recognised and protected mark fulfill the requirements of ISPM No.15.