



## ISPM 15 Frequently Asked Questions

[www.daff.gov.au](http://www.daff.gov.au) > Quarantine and Export Services HOME > Timber > Importing timber and wood packaging to Australia

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### **Mandatory treatment for all solid timber packing**

On 1 January 2006, Australia will begin a phase in of mandatory treatment requirements for all solid timber packing and dunnage. Mandatory treatment for solid timber packing and dunnage is being introduced to reduce the risk of pest or disease entry through this high risk commodity.

The introduction of mandatory treatment is new for air and break bulk cargo. For air and break bulk cargo it will initially be achieved through the expansion of ISPM 15 requirements until importer or broker accreditation arrangements can be developed.

Because this represents a significant change in how quarantine risks associated with solid timber packaging are managed, the phase in will involve a notification or non-enforcement period extending until 30 April 2006. During this notification or non enforcement period AQIS will only send solid timber packing and dunnage for treatment, re-export or destruction onshore where AQIS detects the presence of live pests of quarantine concern insects, bark, or other quarantine risk material such as soil and contaminating plant material.

In all other circumstances where non-compliance with the new treatment requirements are identified AQIS will notify the importers that from 1 May 2006 solid timber packing will be subject to an AQIS approved treatment at the importers expense.

### **■ What is ISPM 15?**

ISPM 15 is the 'International Standards for Phytosanitary Measures Publication No. 15: Guidelines for Regulating Wood Packaging Material in International Trade'. The full text of this standard is available from the International Phytosanitary Portal.

### **■ Why was ISPM 15 developed?**

ISPM 15 was developed to address the global spread of timber pests by regulating the movement of timber packing and dunnage in international trade. ISPM 15 describes phytosanitary measures to reduce the risk of introduction and/or spread of quarantine pests associated with solid timber packing material (includes dunnage).



### **■ Who developed and endorsed ISPM 15?**

The United Nations Food & Agriculture Organisation (FAO) addresses plant quarantine through the International Plant Protection Convention (IPPC). The IPPC is an international treaty administered by the FAO and implemented through the cooperation of member governments. Australia is a member or 'contracting party' to the treaty.

As for all other ISPMs, the Secretariat to the IPPC coordinated the development and preparation of ISPM 15 over a period of time through an agreed and defined process of draft development and country consultation.

ISPMs are recognised as the basis for phytosanitary measures applied by members of the World Trade Organisation (WTO) under the Agreement on the Application of Sanitary and Phytosanitary Measures (the SPS Agreement). Australia has been a WTO member since 1995.

The Interim Commission on Phytosanitary Measures (ICPM) adopted ISPM 15 in March 2002. The establishment of a Commission on Phytosanitary Measures that will serve as the global agreement's new governing body was provided for in a 1997 revision to the text of the IPPC. Members of the new Commission will be the contracting parties to the IPPC. The FAO established the Interim Commission on Phytosanitary Measures (ICPM) as an interim measure until the New Revised Text of the IPPC comes into force. As Australia is a contracting party to the IPPC, Australia is therefore a member of the ICPM.

More detailed information on the ICPM, the IPPC (including its relationship to international trade), and other international agreements is provided on the International Phytosanitary Portal, the official website for the International Plant Protection Convention.

Further information on the WTO and FAO including the SPS Agreement, is available from the WTO website.



### ■ What countries have implemented ISPM 15 for their exports?

Many countries, including Australia, have implemented systems to accept ISPM 15 compliant imports. However, this does not necessarily mean that these countries also have ISPM 15 programs in place for their exports. Australia has implemented ISPM 15 for their exports.

Countries are not obliged to advise trading partners of their ISPM 15 export readiness so it is difficult to determine the ISPM 15 export readiness of various countries. However, the information that AQIS has obtained from the Internet is available at International Implementation of ISPM 15. Alternatively, the National Plant Protection Organisation (NPPO) of the exporting country. NPPO contacts for each country are available on the International Phytosanitary Portal.



### ■ What is timber packing and dunnage?

- Packing is used to support, protect or carry a commodity.
- Packing includes dunnage, pallets, crating, packing blocks, drums, cases, load boards, pallet collars and skids.
- Packing can be constructed of any number of materials including timber (or wood).
- Dunnage is used to secure or support a commodity but does not remain associated with the commodity.

NOTE: Even though plywood and veneer peeler cores used in the construction of packing falls outside the scope of ISPM 15, Australia regulates the import of packing made entirely or partly of these products.

AQIS import requirements for packing made of solid timber, plywood and/or veneer peeler core are provided in the AQIS publication 'Cargo Containers: Quarantine aspects and procedures'. The AQIS Import Conditions database, ICON, also provides import requirements.

For importation into Australia packing made from Chipboard, MDF, HDF and other manufactured products do not require treatment. More information on packing made from these reconstituted wood products is available on the AQIS Import Conditions database, ICON. These products are not considered to be timber or wood by AQIS and do not need to be declared on packaging declarations.



### ■ Does Australia accept timber packing marked with ISPM 15 compliant stamps?

Yes, but do not forget that Australia also requires all timber packing (including dunnage), whether marked with ISPM 15 compliant stamps or not, to be free of bark.



### ■ Why does AQIS require imported timber packing (including dunnage) to be free of bark?

Bark has the potential to contain numerous pathogens of quarantine concern. It also acts as a shelter site for insect pests and encourages post treatment infestation by both insect and pathogen pests. The presence of bark also hampers inspection procedures and may reduce the effectiveness of methyl bromide fumigation. For these reasons, AQIS requires imported timber packing to be free of bark.



### ■ Is the ISPM 15 import option mandatory for timber packing entering Australia?

No. The ISPM 15 import option is one of a number of import options offered by AQIS for timber packing. Importers are able to choose the import option that best suits their business needs.

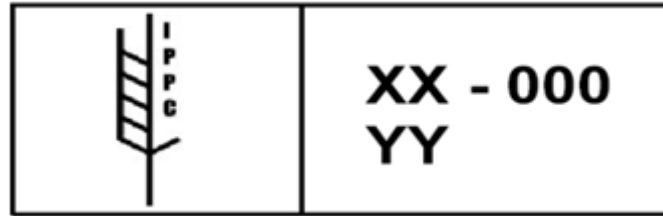
With the exception of clearance on the basis of inspections alone, import options for timber packing that were in place prior to 1 January 2006 continue to be available to ensure continued market access to Australia for countries that have not implemented ISPM 15 programs for their exports.



### ■ What does an ISPM 15 compliant stamp or mark look like? What do the symbols in the stamp mean?

Timber packing and dunnage bearing the mark below is certified as having been subjected to an ISPM 15 approved treatment.

ISPM 15 mark



An ISPM 15 compliant mark must include:

- The International Plant Protection Convention (IPPC) symbol
- The ISO two letter country code 'XX' (e.g. AU for Australia, US for United States, NZ for New Zealand, GB for United Kingdom) followed by a unique number '000' assigned by the National Plant Protection Organisation (NPPO) to the producer of the timber packing. This component of the mark enables the producer of the timber packing or dunnage to be identified.
- 'YY' indicates the ISPM 15 approved treatment applied to the timber packing material or dunnage, where:

HT represents heat treatment.

MB represents methyl bromide fumigation.

The letters 'DB' represent debarking. DB may be added to the abbreviation of the ISPM 15 approved treatment. For example, 'HT DB' represents heat treatment and debarking and 'MB DB' represents methyl bromide fumigation and debarking.

The ISPM 15 compliant stamp may include further information as NPPOs, producers and suppliers may choose to include additional information for identification purposes.



### ■ Where should ISPM 15 marks be located on timber packing?

To aid in validation inspections ISPM 15 compliant marks should be clearly visible and AQIS recommends that they appear on at least two opposite sides of the article being certified. To be ISPM 15 compliant only 1 mark is required. The marks must be permanent and not transferable. Hence metal plates and stickers are not acceptable. In addition, ink and paint stamps have proven to be non-permanent as many stamps entering Australia have become illegible during transport. AQIS therefore recommends the use of heat branding.



### ■ Do the ISPM 15 approved measures of heat treatment and methyl bromide fumigation offer permanent protection to timber packing against timber and non-timber pests?

Neither of the ISPM 15 approved measures offers permanent protection against post-treatment infestation of timber packing by timber and non-timber pests. The treatments only control pests present at the time of treatment.

Australia's interception records demonstrate that post treatment infestation of solid timber packing is an important quarantine issue. Australia will be pursuing these quarantine concerns in the appropriate international forums. To ensure that the risks of post treatment infestation by both timber and non timber pests is minimised AQIS has developed a range of quality assurance and verification mechanisms which vary with the mode of transport. These involve verification inspections, surveillance regimes and unpacking of containerised cargo at specially approved quarantine approve premises and freedom from bark to minimise hitch hiker risks and ensure effective verification inspection.

AQIS is undertaking additional surveillance of imported timber packing to monitor the implementation of ISPM 15 and assess whether or not ISPM 15 is addressing Australia's quarantine concerns.



### ■ Do AQIS procedures addressing Giant African Snail remain unchanged?

Yes. Whilst AQIS accepts timber packing marked with ISPM 15 compliant stamps from all countries including GAS countries, AQIS import requirements that address Giant African Snail (GAS) risk remain unchanged. This is because ISPM 15 treatments only address quarantine concerns that are present at the time of treatment, not the risks of post treatment infestation or 'hitch-hiker' pests (pests not associated with particular commodities). As GAS is a 'hitch-hiker' pest, ISPM 15 treatments do not address AQIS concerns and AQIS import requirements that address Giant African Snail (GAS) risk remain unchanged.



### ■ Does the AQIS '21 day rule' apply to solid timber packing marked with ISPM 15 compliant stamps?

**Whether or not the 21 day rule applies depends on the circumstances:**

- Yes, if none of the timber packing (includes dunnage) in a consignment is marked with ISPM 15 compliant marks and the timber packing material has been treated offshore. Import conditions require treatment to be applied within 21 days of containerisation or shipping (this is extended to 3 months for certain countries).
- Yes, if some of the timber packing in a consignment is marked with ISPM 15 compliant marks and some is not marked with ISPM 15 compliant marks a packing declaration and other evidence of treatment is required and the '21 day rule' as described above applies to the entire consignment.
- No. If all timber packing in a container is marked with ISPM 15 compliant stamps, the '21 day rule' does not apply.

Note: In all other circumstances timber packing will be subject to a verification inspection and if and untreated timber packing is detected it will be sent to AQIS is currently reviewing the '21 day rule' requirement.



### ■ Can I re-use solid timber packing marked with ISPM 15 compliant stamps?

According to the ISPM 15 standard, ISPM 15 marked solid timber packing (includes dunnage) may be used again, but if re-exported from Australia, it is the exporter's responsibility to ensure that it meets the requirements of the importing country.



### ■ Does AQIS monitor imported timber packing marked with ISPM 15 compliant stamps?

Yes. AQIS is conducting surveillance on imported timber packing as part of Australia's performance assessment of ISPM 15. As ISPM 15 is under technical review, the performance assessment of ISPM 15 will contribute to Australia's input into the technical review of this standard by the International Forestry Quarantine Research Group.



### ■ Can untreated timber, without ISPM marks or evidence of other treatment, be separated from the goods to facilitate clearance?

As is the case now consignments that contain untreated timber packing and no other quarantine concerns may be transported to a Quarantine Approved Premise and the goods separated from the timber packing to allow clearance. From 1 January 2006 the timber packing will nominally be subject to treatment, re-export or destruction at the importers expense.



## Import conditions for Containerised Sea Cargo

### ■ What treatments does AQIS accept for solid timber packing associated with containerised cargo?

AQIS has long regulated imported timber packing (includes dunnage) and over time has approved a number of treatments. AQIS commenced accepting timber packing marked with ISPM 15 compliant stamps on 1 September 2004. All AQIS approved treatments are outlined in the AQIS publication 'Cargo Containers: Quarantine aspects and procedures' and on the AQIS Import Conditions database ICON.

If timber packing (including dunnage) has been subjected to an ISPM 15 approved treatment, AQIS requires the timber

packing to be marked with ISPM 15 compliant marks to be granted quarantine clearance without any further quarantine intervention.

NB: Timber packing marked with ISPM 15 compliant stamps is considered acceptable under existing Australian compliance agreement arrangements such as the Containerised Cargo Clearance for FCL/X Scheme.

AQIS offers a number of clearance mechanisms for containerised consignments that have been treated offshore. These include clearance on the basis of a treatment certificate and/or a packing declaration. The full details of these clearance mechanisms can be found at on the AQIS Import Conditions database ICON.



### **■ When can timber packing associated with containerised cargo be granted quarantine clearance based on a packing declaration?**

**a)** If ALL timber packing in a consignment is marked with ISPM 15 compliant stamps, free of bark and no other quarantine concerns exist (e.g. the presence of straw, contamination etc.); **OR**

**b)** If ALL timber packing in a consignment is covered by treatment certification acceptable to AQIS, free of bark and no other quarantine concerns exist (e.g. the presence of straw, contamination etc.). This option is applicable regardless of whether any timber packing in the consignment is marked with ISPM 15 compliant stamps.

If a packing declaration or treatment certification is unacceptable to AQIS, importers are offered alternative clearance procedures such as inspection, treatment, re-export or destruction. All alternative clearance procedures are conducted at the importers expense. However, from 1 January 2006, AQSI will begin phasing inspection alone as an option for granting quarantine clearances for containerised sea cargo consignments that contain timber packing and dunnage.

Timber packing eligible for quarantine clearance based on documentation alone will be subject to surveillance by AQIS to ensure compliance.



### **■ How will AQIS phase out inspection alone as an option for granting a quarantine clearance for all solid timber packing?**

As of 1 January 2006 mandatory treatment of timber packing and dunnage will be required. However a non enforcement period will be in effect until 30 April 2006. During the non enforcement period importers will be notified of non compliance and only when packing is infested with insects or contaminated soil, bark, or other Quarantine risk material will it be sent for treatment. After 30 April 2006 all timber packing will be required to be compliant with ISPM 15, evidence of acceptable offshore treatment provided or the timber packing subject to onshore treatment, re-export or destruction.

For containerised sea cargo a packing declaration will continue to be used as a risk profiling tool and the means to determine whether or not ISPM 15 compliant wood packaging has been used.



### **■ Where can I obtain an example of an AQIS Packing Declaration?**

Packers/suppliers of containerised cargo need to complete a Packing Declaration if an importer chooses to utilise the facilitated quarantine clearance system for timber packing associated with containerised cargo.

Examples of ISPM 15 FCL and LCL Packing Declarations (i.e. they cater for the use of timber packing marked with ISPM 15 compliant stamps) are provided as Attachments to Import Industry Advice Notice 2003-2004 No. 19. Examples are also provided in Appendix VII of the AQIS publication 'Cargo Containers: Quarantine aspects and procedures'.

Appendix VII also provides examples of FCL and LCL Packing Declarations that have not been updated to cater for the use of timber packing marked with ISPM 15 compliant stamps. AQIS will continue to accept these 'old format' Packing Declarations as some packers/suppliers of containerised cargo may prefer to not use ISPM 15 marked timber packing or may not have access to ISPM 15 marked timber packing. However, even if timber packing is not marked with ISPM 15 compliant stamps, packers/suppliers may use either the 'old format' or the updated ISPM 15 Packing Declarations.

ISPM 15 Packing Declarations are only required if timber packing used within a containerised consignment is marked with ISPM 15 compliant stamps and the importer elects for quarantine clearance of the packing based on documentation alone.



## **Air and Break Bulk Cargo**

### **■ Will Packing Declarations be required for timber packing and dunnage used in supporting air and break bulk cargo?**

No. Until a broker accreditation type arrangement can be developed AQIS will rely on its normal surveillance mechanisms to determine whether or not ISPM 15 compliant timber packing has been used. There will be no need to present documents to AQIS unless surveillance detects non compliance and importers do not wish the consignment to be treated onshore.



### **■ How will AQIS know if timber packing has been used? Airfreight consignments currently don't require documents to indicate what kind of packaging has been used.**

As there is no broker or industry accreditation arrangements in place for timber packing associated with air cargo it will be assumed by AQIS that any timber packing is compliant with standards until AQIS has evidence to the contrary. It is the importers responsibility to ensure that all packing is compliant with AQIS requirements.



### **■ What will the operational procedures be to incorporate the expansion of ISPM 15 to air and break bulk cargo?**

Until broker accreditation arrangements can be developed most operational procedures will remain the same with the exception that after 1 May 2006 quarantine clearance on the basis of inspection of timber packing will no longer be an option. Compliance will be enforced by AQIS surveillance involving verification inspections. Timber packing that is not marked with ISPM 15 marks will be sent for treatment, re-export or destruction unless evidence of valid offshore treatment can be presented to AQIS front counters.



### **■ What will the importers or their agents be responsible for?**

The importers or their agents will only have additional responsibilities if existing AQIS surveillance detects non-compliance with the ISPM 15 standard. Then, the options described in the previous question apply. These treatments will be at the importers expense. It is the responsibility of importers to ensure that packing is compliant with Australian Quarantine requirements.



### **■ Is there any barrier question, non-conformity or penalty system for brokers with regards to packing declaration?**

No, for Air and Break bulk cargo only, brokers will not be asked the barrier question in ICS "Do all FCL/X containers on this declaration meet AQIS non-commodity requirements and are they all designated to be unpacked in a metropolitan postcode or inside the boundary of an approved AQIS port?". In the advent of noncompliant packing material the absence of packing and treatment certificates for air and break bulk will not result in non-conformity penalties under the Broker Accreditation Scheme. However goods will be subjected to onshore treatment, destruction or re-exportation at importers expense when AQIS surveillance identifies quarantine concerns.



### **■ How will this affect the responsibilities of the QAPs? Are changes to the QAP criteria being progressed?**

From 1 May 2006 the option to clear timber packing for quarantine solely on the basis of inspection will no longer be available. It is not envisaged that changes to the QAP criteria and amendments to training material are needed as these facilities are already required to have procedures in place to address quarantine issues relating to timber packing.



### **■ Have steps been made to progress changes to the Broker Schemes to incorporate these changes?**

AQIS is currently reviewing the ability of the new Integrated Customs System to explore options for the expansion of the broker accreditation arrangements to air and break bulk cargo.

 [TOP](#)

**■ Will the new regime affect the inspection of Unaccompanied Personal Effects (UPEs)?**

UPEs undergo 100% inspection which covers any timber packing. Under the new regime timber packing used in the UPEs will require compliance with ISPM 15 or evidence of alternative AQIS approved treatment.

 [TOP](#)

**■ Will wood packing attached to break bulk timber bundles/packs be required to be ISPM 15 compliant?**

As ISPM 15 compliant timber packing can be reused, may have a long service history and is typically made from low grade timber it is considered by AQIS to be of higher quarantine risk than most commercially imported timber. Gluts are also typically comprised of low grade timber with a higher pest risk. With the exception of stickering or gluts of the same grade as the timber, any timber packing and dunnage must be compliant with ISPM 15 or evidence of other acceptable treatment provided.

 [TOP](#)

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