Wood Packaging
Questions and Answers

The need for new wood packaging requirements

Q.1 Why has Canada established import requirements for the entry of wood packaging?
A.1 Many countries have recognized that wood packaging is an important pathway in the transmission of several very serious forest pests. Generally, wood packaging material has been made from raw wood, which is associated with many exotic phytosanitary pests.

In March 2002, the International Plant Protection Convention’s (IPPC) Fourth Interim Commission on Phytosanitary Measures (ICPM 4) adopted new guidelines for the uniform regulatory control of wood packaging moving in international trade: International Standards for Phytosanitary Measures (ISPM) Nº 15: Guidelines for Regulating Wood Packaging Material in International Trade. ISPM Nº 15 describes guidelines for harmonized phytosanitary measures applicable to wood packaging. Canada, as a member of the International Plant Protection Convention, has adopted this international standard as its national import policy for Canada.

Q.2 Why are regulations needed to control wood packaging moving internationally?
A.2 Many invasive plant pests have been intercepted on wood dunnage, pallets, crating or other wood packaging imported into Canada. Examples of plant quarantine pests intercepted include Anoplophora chinensis, Anoplophora glabripennis, Ips typographus, Hylastes ater, Monochamus sp., Trichoferus campestris and others. The introduction of the Asian long-horned beetle (Anoplophora glabripennis), the pine shoot beetle (Tomicus piniperda), and the emerald ash borer (Agrilus planipennis) can be attributed to wood packaging moving internationally in trade.

Q.3 What items are considered wood packaging?
A.3 Any of the following that is made from non-manufactured wood: dunnage, pallets, spacers, bearers, crating, etc.

Q.4 Are there wood packaging items that are exempt from these requirements?
A.4 Packaging that is made from manufactured wood such as plywood, oriented strand board, fibre-board, etc.: paper or cardboard products; or non-wood articles. The following products are also exempt: wood packaging items made from wood less than 6 mm in thickness or from veneer peeler cores. Veneer peeler cores are the centres of logs that are a by-product of the peeling process. The peeling process involves very high temperatures that would eliminate the presence of any pest.

Q.5 Is ship dunnage regulated?
A.5 Yes. Ship's dunnage is wood used to brace cargoes aboard a marine vessel. It is considered wood packaging. Vessels may only discharge dunnage compliant with the requirements specified in policy D-98-08. The responsibility of ensuring ship dunnage is compliant rests with Canadian berthing facilities and the ship's agents in Canada. If non-compliant dunnage is discharged in Canada, the port facility may be held responsible for ensuring that dunnage is brought into compliance through removal from Canada. In some cases, at the discretion of an inspector, the CFIA may approve alternative options for dealing with non-compliant ship's dunnage.

Q.6 I import specialty woods from all over the world. Is the dunnage attached to the lift of lumber regulated by policy D-98-08?
A.6 Yes, dunnage attached to lumber is regulated in the same way as other wood packaging.

Q.7 Does D-98-08 regulate wood packaging arriving on all modes of transport?
A.7 Yes. All modes of transport are subject to the conditions of the policy: air, rail, ship and road.

Information for importers

Q.8 If the wood packaging attached to my importation is not compliant, am I responsible as the importer?
A.8 Yes. Any shipments with non-compliant wood packaging will be ordered removed from Canada at the responsibility of the importer or person in care and control of the regulated articles.

Q.9 If I'm an importer, how do I know if the goods I receive meet the new wood packaging requirements?
A.9 Importers should contact their exporters to determine if the wood packaging they're using complies with Canada's import requirements. Many countries have indicated that they have systems in place to meet Canada's new requirements.

Q.10 What do I need to do to ensure foreign wood packaging is compliant for entry into Canada?
A.10 Wood packaging entering Canada and originating from any country other than the continental United States, must meet the following requirements:

- The wood packaging must be heat treated or fumigated using methyl bromide at rates specified in policy D-98-08;
- The treatment or a process of treatment must be officially endorsed by the National Plant Protection Organization (NPPO) of the exporting country;
• The treated packaging must bear an internationally recognized mark or another mark approved by the CFIA. In lieu of this mark, the consignment may be accompanied by a Phytosanitary Certificate specifying the treatment used, see Appendix 1 of D-98-08.

Q.11 When will these requirements come into effect?
A.11 The rules are in effect now.

Q.12 Will there be some grace period for wood packaging shipments?
A.12 No, Canada provided a grace period of more than two years. That grace period is now over.

Q.13 Do the wood packaging materials need to be debarked?
A.13 No. Debarking is not required. The wood must be either heat treated or fumigated using methyl bromide. It must be either identified with an internationally recognized mark, or be accompanied by a Phytosanitary Certificate specifying the treatment used.

Q.14 Methyl bromide treatment is expensive, are there any other acceptable treatments?
A.14 Acceptable methods of treatment are available in Appendix 1 of D-98-08.

Please note that, in accordance with Canada's ratification of the United Nations' Montreal Protocol on Substances that Deplete the Ozone Layer (1992), the CFIA does not promote the use of methyl bromide. However, methyl bromide is viewed as an effective treatment for mitigating pest incidence in wood packaging and has been adopted internationally as a treatment.

Q.15 I import wine and/or spirits. Are the wooden barrels/finished display boxes regulated?
A.15 No. These items are considered forest products. Requirements for these are specified in policy D-02-12.

In general, barrels containing spirits are not regulated. Barrels for other purposes, such as packaging or decorative use, are regulated.

Q.16 If non-wooden boxes are reinforced on the inside with wooden parts, can the IPPC mark be placed on the exterior sides of the box? Or must it be placed on the individual wooden components?
A.16 If the wooden components are secured to the carton box (staples, nails, glue, etc.) and the only way for the wood to be removed is by destroying the carton box, then the mark may appear on the outside of the box. The actual treatment and procedures to assure traceability of the reinforcement material must be approved by the National Plant Protection Organization (in Canada, this is the CFIA) before the international recognized mark can be used.

The facility is responsible for ensuring that all pieces of wood contained in the carton boxes are treated in accordance to ISPM No. 15.
If the wooden components are not secured within the box (e.g., nailed, glued, stapled or other), then each individual piece that exceeds 6 mm in thickness must be identified with the internationally recognized mark.

For more information, please call your local office of the CFIA.

**International Trade**

**Q.17** If the imported commodities are shipped on wood packaging originating in the United States only, must they meet these new requirements?

**A.17** Both Canada and the U.S. have agreed not to regulate wood packaging moving between the two countries. They recognize that the existing pest specific regulatory controls are sufficient protection. As such, requirements for treatment will not be applied to Canadian wood packaging moving to the continental U.S. or vice versa. Such recognition allows Canada to focus its inspection resources on higher-risk countries to ensure compliance. There are no declarations required either by Canada or the U.S. to verify origin of the wood.

Canadian or U.S. untreated wood packaging that has moved overseas is not eligible to re-enter Canada without treatment. The identity of the wood packaging can not be confirmed and as such must be treated prior to return as wood packaging.

**Q.18** If I import goods through the United States, must the wood packaging comply with the requirements?

**A.18** Yes, regardless of whether the commodity transits through the United states, all wood packaging produced in a country other than the United States must meet Canada’s import requirements.

**Q.19** How does this change affect regulations applying to China and Hong Kong in policy D-98-10?

**A.19** D-98-08 supersedes D-98-10 (3rd Revision), as such, imports from China and Hong Kong must meet the requirements of D-98-08.

**Q.20** I export and import commodities. Often my Canadian wood packaging is sent offshore before returning to Canada. Must it still meet these import requirements?

**A.20** As an exporter, Canadian law requires that you meet the importing country’s phytosanitary import requirements. Requirements for the export of certified wood packaging are provided in policy D-01-05.

If you are shipping untreated wood packaging overseas to countries not requiring treatment, the wood packaging returning to Canada must meet the requirements specified in the policy. As such, to ensure that the wood has not become infested in the destination country, the wood packaging must be treated and certified before returning to Canada.
For more information, please call your local office of the CFIA.

Q.21 I am importing wood packaging from a country that does not have a system in place to meet the standards of Canada’s import requirements. Am I exempt from the requirements?
A.21 No. Wood packaging must be compliant with Canada's import requirements. Canada has provided sufficient time for countries to develop certification programs for wood packaging materials.

Q.22 I export goods to many countries. Should I expect similar requirements from other countries?
A.22 The International Standard for Phytosanitary Measures No. 15: Guidelines for Regulating Wood Packaging in International Trade, encourages countries to adopt similar import measures to reduce the incidence of unwanted exotic pests moving to new areas. In 2005, Canada, the United States and Mexico decided to adopt this International Standard as import measures. Many other countries have given notice that they intend to adopt the recommendations of ISPM No.15.

New and detailed information is regularly updated by the CFIA regarding the worldwide implementation of ISPM No.15.

Information about inspection and penalties

Q.23 How will you know if my wood packaging is compliant?
A.23 Canada is conducting inspections to verify compliance. Both tailgate and destuffing inspections will be used. The CBSA is currently performing these inspections for wood packaging arriving in our major ports.

Q.24 If a consignment contains wood packaging, what will happen to it when it enters Canada?
A.24 Your shipment may be re-directed to a facility where the commodity will be inspected. Your shipment may be ordered to be inspected at destination. The inspection staff may order the container or other shipping unit to remain sealed until they are able to inspect it. Upon inspection, the CFIA/Canadian Border Services Agency will determine whether the conditions for entry have been met.

Any costs associated with the inspection or with bringing a shipment into compliance with Canadian import requirements are the responsibility of the importer or person in care and control of the shipment.

Q.25 If the wood packaging attached to my shipment is not compliant with Canada’s new requirements, what penalties will be imposed?
A.25 Any wood packaging that is lacking the internationally approved mark or found to be infested will be refused entry into Canada. It may also be treated to mitigate the risk of pest entry prior to being refused.

All costs associated with non-compliant wood packaging are the responsibility of the importer or person in care and control of the regulated articles.

Canada has provided sufficient warning to its trading partners of the effective date of this policy of increased enforcement.

Q.26 What will be the charge for inspection of containers for wood packaging to verify conformity for entry into Canada?

A.26 For wood packaging found within containers imported to Canada, the applicable fee is $18 per lot. A lot, in the case of cargo containers, is defined as "three units or less that are owned by one person" and "in any other case, a number of units of a single thing that is or will be transported by a conveyance or a person and that is owned by one person."

Q.27 What fees apply if wood packaging is found to be non-compliant for entry into Canada?

A.27 Fees are applied to all inspection activities. Fees must be paid by the importer or person in care and control of the shipment. Applicable fees are set out in Table 1, Part 12, of the CFIA Fees Notice, or $86 per hour or part of an hour, whichever is the greater amount.

All other direct costs associated with control/enforcement actions for wood packaging, (transportation, deep burial, etc.) are to be borne directly by the importer or person having the possession, care or control of the wood packaging.

Q.28 Who do I contact for further information?

A.28 New and detailed information is regularly updated by the CFIA regarding the worldwide implementation of ISPM N°15. You can also subscribe to our listserv.

For policy related questions, please call your local office of the CFIA or 1-800-442-2342.

If you have an operational question, please visit the Canada Border Services Agency (CBSA) website.