



Forestry Division, Plant Health & Biosecurity Directorate
59 Camelot Drive, Ottawa, ON, K1A 0Y9

MEMORANDUM TO:

Association du camionnage du Québec
BC Chamber of Shipping
Canada Wood
Canadian Association of Importers &
Exporters
Canadian Chamber of Shipping
Canadian Consumer Specialty Products
Association
Canadian Council of Grocery Distributors
Canadian Federation of Independent Grocers
Canadian International Freight Forwarders
Association
Canadian Manufacturers Association

Canadian Lumber Standards Accreditation
Board
Canadian Society of Customs Brokers
Canadian Transportation Equipment
Association
Canadian Vehicle Manufacturers'
Association
Canadian Wood Pallet and Container
Association
ESSA Canada LLC
Supply Chain & Logistics Association
Canada

**SUBJECT: Implementation of ISPM 15 (2009) for Wood Packaging Moving Between
Canada and the United States (US)**

Wood packaging material (WPM) moving in international trade (wooden pallets, crates, dunnage, etc. used in the transportation of goods) is regulated by many countries - to prevent the spread of pests - in accordance with the specifications described in the International Standard for Phytosanitary Measures (ISPM) No. 15 (2009) *Regulation of wood packaging material in international trade*.

In 2005, Canada and the U.S. implemented import requirements for WPM consistent with ISPM 15, but agreed to forego implementation of these requirements on Canadian or US origin WPM moving between Canada and US. Since then, both countries have completed a review of the pest-risk associated with WPM and have concluded that several pest risks and logistical issues can be addressed by requiring wood packaging moving between Canada and the US be compliant with ISPM 15 (2009). These include improved protection from the movement of pests present in one country; improved regulatory control of non-compliant WPM which originated in a third country and improved ongoing usage of WPM regardless of end destination.

Recognizing that the regulation of WPM moving between Canada and the US brings with it added costs and time to utilize existing WPM inventories, and to establish new WPM production practices, Canadian and US regulators have agreed to establish a harmonized implementation process to phase in the ISPM 15 requirements.

On December 2, 2010, the US published a proposed rule notifying their intention to regulate the import of WPM from Canada in the same manner as WPM entering from other countries. The US proposed rule can be accessed online at:

<http://edocket.access.gpo.gov/2010/2010-30206.htm>

The CFIA is also revising Canada's regulatory policies for WPM entering or leaving Canada:

- D-98-08: *Entry Requirements for Wood Packaging Materials Produced in All Areas Other Than the Continental United States* will be revised to include WPM from all US. D-98-08 is available online at: <http://www.inspection.gc.ca/english/plaveg/protect/dir/d-98-08e.shtml>
- D-01-05: *Canadian wood packaging certification program (CWPCP)* for export will be revised to include exports of WPM to the US. D-01-05 is available online at: <http://www.inspection.gc.ca/english/plaveg/protect/dir/d-01-05e.shtml>

Although the full implementation timelines have not been finalized, it is expected that the Canadian policies and the US final rule will be published in the spring of 2011, at which time both countries will commence a period of "informed compliance", during which WPM found non-compliant will be permitted to proceed to destination provided no pests are present. However, the carrier will be notified that shipments will be required to comply with ISPM 15 once full implementation occurs. If pests are detected, the countries will enforce actions such as requiring treatment of the shipment, or refusing the shipment to enter the country.

Canada and the US are aiming for full implementation of ISPM 15 for WPM as early as the summer of 2012. At that time, shipments with WPM found to be non-compliant will not be permitted to enter the country of destination. Should pests be detected, the importer may also be required to treat the shipment to prevent escape of pests, prior to having it returned to the country of origin. The importer, or person in care and control of the regulated articles, is responsible for all costs incurred.

Discussions between the CFIA, the US Department of Agriculture, and border authorities in both countries, are currently underway, to establish fair harmonized approaches to WPM inspection and enforcement. The CFIA will continue to provide notices regarding implementation through national industry associations, and publication on the CFIA website at www.inspection.gc.ca

Should you have comments or questions regarding the implementation of ISPM 15 for goods moving between Canada and the US, or wish to obtain information on becoming a certified producer of wood packaging for export, you may contact your local Area Forestry Specialist (as listed below) or send a question or comment through the CFIA website at:

<http://www.inspection.gc.ca/english/tools/feedback/commene.shtml>

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Regards,



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