

## Trace Back

### Notification of Non-Compliance

ISPM 15 requires the importing NPPO to inform the exporting NPPO when a non-compliant item of WPM is found.

Purpose of notification is so the exporting NPPO can investigate the non-compliance and if needed take the necessary steps to correct and prevent recurrence.

### ISPM Guidance for Noncompliance and Emergency Action

- As referenced in section 4.6 of ISPM 15, non-compliance and emergency action is provided in ISPM 13:2001 and ISPM 20:2004 sections 5.1.6.1 to 5.1.6.3
- The information provided in these standards, while informative and useful for dealing with non-compliance and emergency action in the broad sense, **may not provide sufficient guidance for proper trace back and correction of non-compliant WPM**

### ISPM 15 Provides for the Production of Compliant WPM in the Following Ways:

- A manufacturer can manufacture WPM from non-treated wood, treat the manufactured WPM according to ISPM 15 requirements and label the manufactured WPM as ISPM 15 compliant
- or
- A manufacturer may obtain wood that has been previously treated and has been identified and monitored under a NPPO approved procedure, manufacture the WPM from this wood and then label the manufactured WPM as ISPM 15 compliant without further treatment. A facility using this method could have numerous suppliers of treated wood and any markings on such wood are key to trace back if a problem exist with the wood used in the manufacture of ISPM 15 compliant WPM

- Trace back for WPM is difficult where the treatment of the wood is not provided for by the manufacturer of the WPM
- Further complications involve manufacturers that have treatment capabilities but also purchase treated wood from outside sources to supplement production of WPM
- In many cases the WPM may contain wood from numerous treatment providers
- Given the variable production processes of a WPM manufacturer, simply reporting the information contained within the ISPM 15 mark may not be sufficient to facilitate proper trace back thus the problem may not be corrected

- Section 5 of ISPM 13:2001 **requires that notifications are timely.** This is particularly applicable for WPM given the varying production conditions applicable to WPM:

✓ Ideally issuing a report immediately upon finding a quarantine pest is the best

✓ The longer the delay the less chance the exporting country has of correcting the problem--and correcting a problem is extremely important in the success of ISPM 15

**What Information Would be Extremely Helpful to the Exporting NPPO?**

- Detailed shipping records including:
  - ✓ Shipper of the product that was transported on the suspect WPM
  - ✓ Date shipped
  - ✓ Date received
  - ✓ Volume and type of WPM involved
- Digital pictures of the suspect WPM showing all markings that appear on the suspect WPM
- The actual size(s) of the infested piece(s) as well as a listing of all markings observed on those piece(s)
- Surface condition of the infested component(s) i.e. surfaced, rough or some combination of surfaced or rough
- Moisture content of the infested piece(s) if possible

**Examples of Digital Pictures of Additional Markings**



**Following Pictures Show Repaired/Remanufactured WPM Where Multiple Marks Are Present on the WPM**





Questions?

- If you would like a copy of this presentation, please send me an email:
  - [jmcdaniel@alsc.org](mailto:jmcdaniel@alsc.org)

Thank you!!