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THE USDA EXPERIENCE OF ISPM 15

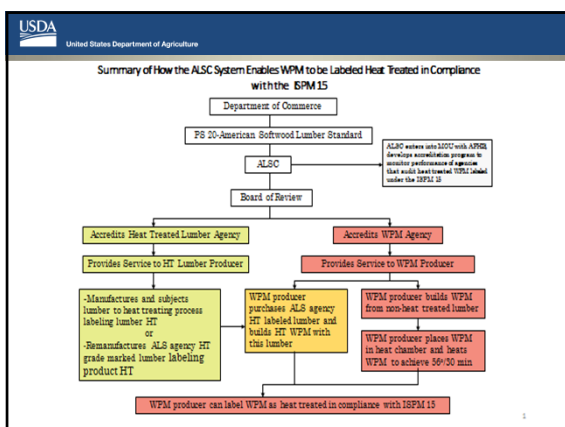


An Overview of the U.S. Implementation
of the International Wood Packaging
Regulations for Exports and Imports

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Three Tier Audit Program— Heat Treatment Program

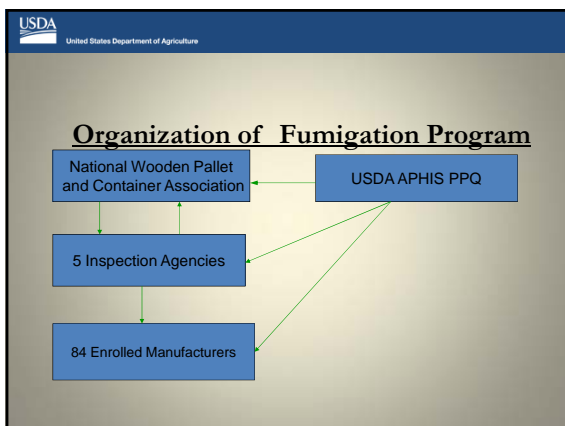
- **Inspection Agencies audit Manufacturers**
 - ◆ Monthly check for: work plan compliance, review of heat chamber records, and inspection of HT lumber
- **ALSC audits Inspection Agencies**
 - ◆ Monthly for: work plan compliance, consolidated reports, and Quality Control procedures
 - ◆ On-site audits of Manufacturers with Inspection Agencies
- **APHIS audits ALSC and Inspection Agencies**
 - ◆ Semi-annually for compliance with MOU
 - ◆ Periodic Field Audits of Manufacturers with Inspection Agencies



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Attachment A: Typical Marks of the 30 ALS Accredited Untreated Agencies Placed on Lumber Indicating the Lumber Has Been Heat Treated in Compliance With ISPM 15

Examples of marks include: KD-HT Stud SPFA, 12 KD-HT SPFA, 2 KD-HT Red Pine, TE No.2 KD HT SYP, CON COM RLS, CSI No 1 KD HT, SPIB No. 2 KD19 HT, C LA 100 S-P-F, WPM No 2, M No 1 KD-HT, A. F. P. A' 00 S-P-F NLGA, OLA MA * 01-1 CONST. KD-HT SPRUCE, PINE, FIR, 477 S-P-F KD-HT NLGA, 001 HT, 001 HT PRL, 0000 HT.




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Use of ISPM 15 Compliant WPM

- WPM that is marked and certified in compliance with ISPM 15 may be reused regardless of country of origin
- ISPM 15 compliant WPM that has been repaired or remanufactured must be recertified under the HT or fumigation option

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Import Regulations



Wood packaging materials in the United States are regulated under 7 CFR 319.40-3 in the Code of Federal Regulations

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WPM Enforcement

Homeland Security Inspections by Customs and Border Protection (CBP)

- ❖ Target through manifest review
- ❖ Physical inspection of shipments
- ❖ 2,000 Agriculture Specialist
- ❖ 18,000 Cross-trained CBP inspectors

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What happens to *non-compliant* shipments that enter the US?

At the expense of the importer:

- ❑ WPM that does not have the ISPM 15 stamp must be re-exported
- ❑ WPM that has the ISPM15 stamp but is found to contain a wood boring pest must be re-exported
- ❑ WPM that has the ISPM 15 stamp but is found with a hitchhiking pest (non wood boring) **may** be fumigated by APHIS/PPQ

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What happens to *non-compliant* shipments that enter the US?

At the election of the Dept of Homeland Security:

- ❑ A Port Director **may** allow the cargo to be separated from the non-compliant WPM that must be re-exported **if** pest risk permits separation of WPM from cargo and **if** they have the resources (staff and overtime) to oversee the reconditioning
- ❑ Otherwise both WPM & cargo will be re-exported

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Annual Interception Total

Count from 4/1/2013 - 5/27/2014				
Row Labels	Count of Serial Number			
Both NC for No Markings and Timber Pest	21			
Non Compliant-No Markings	2735			
Non Compliant-Timber Pest	871			
Grand Total	3627			
WPM with Pests				
Row Labels	Pest	Pest, Lacking ISPM 15 Marking	Pest, Lacking ISPM 15 Marking, Contaminant - Seed	Grand Total
Both NC for No Markings and Timber Pest	12	2		14
Non Compliant-No Markings	29	13	4	46
Non Compliant-Timber Pest	851			851
Grand Total	892	15	4	911

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Challenges of Program




- Dunnage from bulk carriers
- Identifying shipments for inspection
- Insuring education of all sectors of industry
 - Past Practices
 - Current Practices
- Non-agricultural shipments

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Resources Used



- From 1997 – 2006 the initial cost of ALB eradication was \$800 million
- EAB was first found in 2003
 - By 2011 trees cut exceeded 50 million

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Joint Inspection




- Legal boundaries
- Piloting of information sharing

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Fraudulent Stamps

- Portsmouth Virginia



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Fraudulent Stamps

- Portsmouth Virginia



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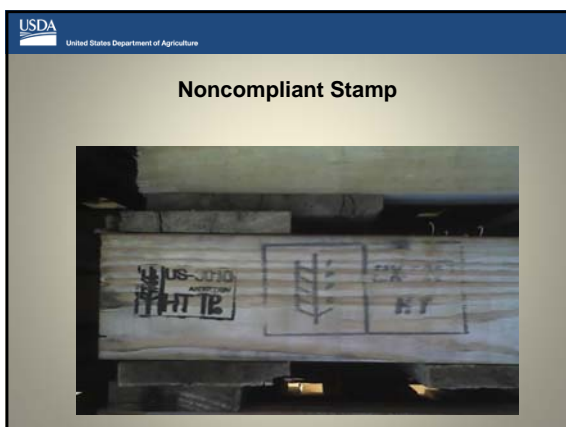
Noncompliant Stamp



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Noncompliant Stamp






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Thank you for your attention!