

# American Lumber Standard Committee, Incorporated

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R.K. Caron, Chairman  
T.F. Brodie, Vice Chairman  
H.B. Sager, Treasurer  
T.D. Searles, President

P.O. Box 210  
Germantown, Maryland 20875-0210  
Telephone: 301.972.1700  
Fax: 301.540.8004  
E-Mail: [alsc@alsc.org](mailto:alsc@alsc.org)

VIA E-MAIL

**TO:** US WPM AGENCIES  
**FROM:** THOMAS D. SEARLES  
**DATE:** APRIL 23, 2009  
**SUBJ:** AMENDMENTS TO ISPM 15

On April 3, 2009, the Commission on Phytosanitary Measures (CPM) approved amendments to ISPM 15. According to IPPC regulations, amendments are effective when approved. However, each importing country sets its adoption policies. We suggest your agency and facilities implement the amendments as quickly as possible.

The substantive changes are as follows:

Sect. 2 – footnote 1 (dunnage) – This language was included to recognize a problem encountered by mills shipping lumber and having to mark the pieces supporting the packages. Our advice is to keep marking those pieces as some countries may continue to turn down shipments not so marked.

Sect. 4.3.2 – Repaired WPM – This amendment defines repaired as WPM that has had up to approximately 1/3 of its components removed and replaced, with the replaced individual components individually marked in accordance with ISPM 15. It further recommends that the number of marks that appear on the WPM be limited. The ALS policy will remain that all repaired WPM shall have all marks removed and if the WPM is to qualify for export shipping shall be re-treated and re-marked in compliance with ISPM 15.\* (\*Exceptions are permitted on a one off basis with special

permission granted by an ALSC accredited agency. For example, a large crate with a tractor in it that had a few broken boards (less than 1/3)—these boards can be replaced with ISPM 15 HT/MB marked boards without re-treating the whole crate.)

Section 4.3.3 – Remanufactured WPM – defines remanufactured as WPM that has more than approximately 1/3 of its components replaced. The WPM shall have all existing marks removed, be re-treated and the mark applied as new in accordance with this standard if the WPM is to qualify for export shipping. The ALS policy remains as is.

Annex 1 – Debarked wood – defined as shown below. There is no change in the draft language you have seen for the past year and a half. The illustration attached (attachment #1) shows the measurement of bark permitted. Please refer to our notice of October 21, 2008 (attachment #2), indicating that the EU will begin enforcing this requirement July 1, 2009.

Dunnage – This paragraph sets forth special requirements for marking dunnage. *“Special consideration of legible application of the mark to dunnage may be necessary because treated wood for use as dunnage may not be cut to final length until loading of a conveyance takes place. It is important that shippers ensure that all dunnage used to secure or support commodities is treated and displays the mark described in this annex, and that the marks are clear and legible. Small pieces of wood that do not include all the required elements of the mark should not be used for dunnage. Options for marking dunnage appropriately include:*

- *application of the mark to pieces of wood intended for use as dunnage along their entire length at very short intervals (NB: where very small pieces are subsequently cut for use as dunnage, the cuts should be made so that an entire mark is present on the dunnage used.)*
- *additional application of the mark to treated dunnage in a visible location after cutting, provided that the shipper is authorized in accordance with Section 4.”*

Annex 2 – Application of the mark. This requirement states in part *“The size, font types used, and position of the mark may vary, but its size must be sufficient to be both visible and legible to inspectors without the use of a visual aid. The mark must be rectangular or square in shape and contained within a border line with a vertical line separating the symbol from the code components. To facilitate the use of stenciling, small gaps in*

*the border, the vertical line, and elsewhere among the components of the mark, may be present. **No other information shall be contained within the border of the mark** (emphasis added). If additional marks (e.g. trademarks of the producer, logo of the authorizing body) are considered useful to protect the use of the mark on a national level, such information may be provided adjacent to but outside of the border of the mark.” This language recognizes rectangular or square stamps and also requires all information other than the IPPC logo, the treatment method separated by a hyphen if on the same line as the country code, and the facility number to be outside the box. This requires the agency logo and Dunnage or Dun (if dunnage is being labeled) to be outside the box as shown in the illustration attached (attachment #3).*

As new stamps are ordered, the new format should be adopted so that transition to the new stamp format takes place in an orderly fashion.

Attached is the new ISPM 15 document (attachment #4). If you have any questions or concerns, please let us hear from you.

TDS:tw

Attachment

cc: ALSC Members & Alternates & Other Interested Parties  
Counsel

#1



Measure bark across the contoured surface at its greatest width as shown in above picture

# Board of Review

American Lumber Standard Committee, Incorporated

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R.B. Parrish, Chairman  
R.L. Ethington  
R.W. Young  
T.D. Searles, President

P.O. Box 210  
Germantown, Maryland 20875-0210  
Telephone: (301) 972-1700  
Fax: (301) 540-8004  
E-Mail: [alsc@alsc.org](mailto:alsc@alsc.org)

VIA E-MAIL

TO: WPM AGENCIES

FROM: THOMAS D. SEARLES

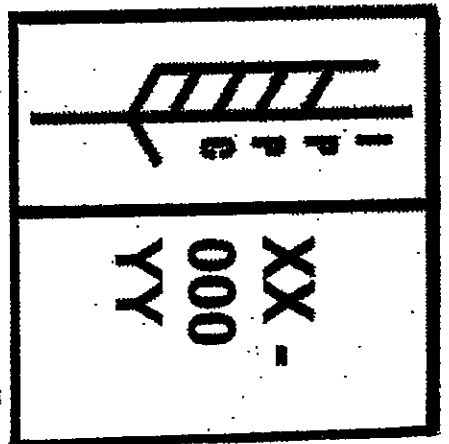
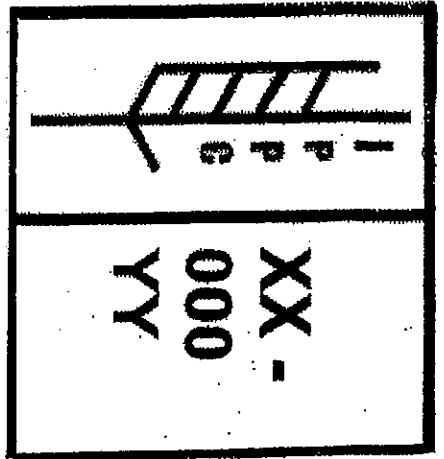
DATE: OCTOBER 21, 2008

SUBJ: EU DEBARKING

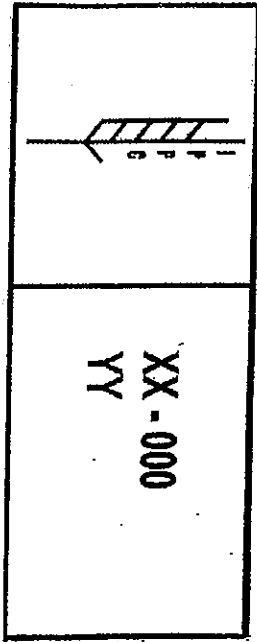
We have just received unofficial notice that the EU will implement its "debarking" requirement on July 1, 2009. Debarking will be defined based upon the proposed amendment to ISPM 15 (up to 3 cm wide unlimited in length; if over 3 cm wide, credit card size).

Facilities should be notified so that WPM destined for the EU can be compliant.

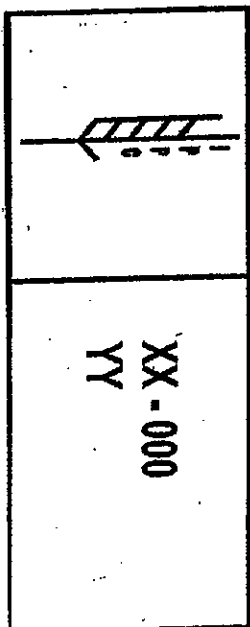
cc: ALSC Members & Alternates  
ALSC Staff  
CLSAB  
Counsel



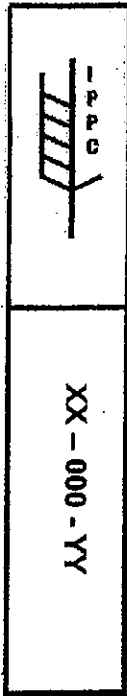
DUNNAGE



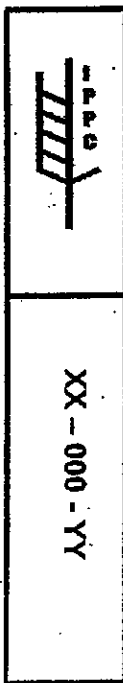
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