



DEPUTY UNDER SECRETARY OF DEFENSE FOR
LOGISTICS AND MATERIEL READINESS
3500 DEFENSE PENTAGON
WASHINGTON, DC 20301-3500

FEB 13 2006

MEMORANDUM FOR DEPUTY CHIEF OF STAFF FOR LOGISTICS, G-4,
U.S. ARMY
DIRECTOR OF MATERIEL READINESS AND LOGISTICS
OFFICE OF THE CHIEF OF NAVAL OPERATIONS
DEPUTY CHIEF OF STAFF FOR INSTALLATIONS AND
LOGISTICS, U.S. AIR FORCE
DEPUTY COMMANDANT FOR INSTALLATIONS AND
LOGISTICS, U.S. MARINE CORPS
DIRECTOR FOR LOGISTICS, JOINT STAFF
DIRECTOR, DEFENSE LOGISTICS AGENCY
DIRECTOR, DEFENSE CONTRACT MANAGEMENT
AGENCY

SUBJECT: Interim Policy on Phytosanitary Measures for Wood Packaging Material
(WPM) Transiting International Borders

This memorandum provides policy guidance to the Military Services on the certification of raw wood products used for the protection and preservation of DoD cargo to enable movement of the cargo across international borders without disruption. This policy was developed in response to international implementation of the United Nations (UN) Food and Agriculture Organization (FAO) protocol on International Standards for Phytosanitary Measures (ISPM) 15. ISPM 15 is a protocol designed to block movement of pests that can destroy forests from one nation to another.

Under the provisions of ISPM 15, any improperly marked or untreated wood product is subject to seizure at the border of any nation enforcing the UN FAO ISPM protocol. The cargo must then be repackaged at the shipper's expense or it may be rejected and ordered to be returned to country of origin. The attached guidance provides methods, when implemented, that will ensure that DoD cargo will meet international requirements.

The interim policy requires the Services to test, treat and phase-out all non-compliant WPM over time. The cost to each Service is estimated at \$600,000 per year for packaging/repackaging materiel and for development and maintenance of a web-based auditing/monitoring program which is require to meet ISPM standards. This interim policy is effective for 6 months from the date of signature or until a DoD Manual on WPM is published, whichever comes first.


Jack Bell

Attachment:
As stated



Interim Policy on Phytosanitary Measures for Wood Packaging Material (WPM) Transiting International Borders

- References:
- (a) International Standards for Phytosanitary Measures (ISPM) Number 15, Guidelines for Regulating Wood Packaging Material in International Trade, United Nations (UN), Food and Agriculture Organization (FAO)
 - (b) Federal Regulations Part 319, 7 Code, Importation of Wood Packaging Material

1. **PURPOSE:** Consistent with the international standards for the regulation of Wood Packaging Material (WPM) transiting international borders, reference (a), and implementation of Department of Agriculture regulations governing importation of regulated WPM, reference (b), this interim policy:

1.1. Delegates authority, establishes policy, and assigns responsibilities for the management of WPM in peacetime and across the spectrum of military operations.

1.2. Designates the Office of the Assistant Deputy Under Secretary of Defense (Supply Chain Integration) as the DoD focal point for WPM.

1.3. Identifies the roles and responsibilities of the Military Departments and Defense Agencies.

2. **APPLICABILITY AND SCOPE:** This interim policy:

2.1. Applies to the Office of the Secretary of Defense, the Military Departments, the Chairman of the Joint Chiefs of Staff, the Combatant Commands, the Office of the Inspector General of DoD, the Defense Agencies, the DoD Field Activities, and all organizational entities in DoD (hereafter referred to collectively as the “DoD Components”).

2.2. Applies to all DoD Components that use regulated WPM such as those engaged in logistical functions supporting elements of the U.S. Armed Forces.

3. **DEFINITIONS:** (See enclosure)

4. **POLICY:**

4.1. Phytosanitary requirements for WPM imposed by the UN guidelines (reference (a)) protect forests worldwide against pest infestation. DoD Components engaged in packaging of materiel for transnational shipments shall comply with this interim guidance in order to gain access to aerial and water ports. If these procedures are not followed, there is a strong risk improperly marked materiel will become frustrated cargo, destroyed at the port, or be required to be repacked at the port of debarkation, causing increased cost and time delays to DoD.

4.2. These DoD WPM procedures are intended to be applied consistent with the Animal and Plant Health Inspection Service (APHIS) regulations (reference (b)). The

Interim Policy on Phytosanitary Measures for Wood Packaging Material (WPM) Transiting International Borders

intent is to treat, test or phase-out all non-compliant WPM over time. WPM includes pallets, crates, boxes, and reels and dunnage composed of non-manufactured wood. Some examples of manufactured wood products not affected are plywood, particleboard, and finished woods used in furniture, etc. Sources, shippers, and receivers in the DoD Components' supply chain shall be responsible for identifying, replacing, and the remediation of non-compliant WPM. DoD shipments coming from countries that are not IPPC signatories shall comply with the DoD provisions of this interim guidance and implementation by DoD Components.

5. RESPONSIBILITIES:

5.1. New WPM. New WPM acquired by DoD Components shall be compliant with ISPM 15 standards (reference (a)). Within the United States, the DoD Components shall also adhere to the American Lumber Standard Committee (ALSC) and the National Wood Pallet and Container Association (NWPCA), guidelines on "Pest Free" WPM. In overseas areas, DoD Components shall procure all WPM in compliance with host nation implementation of UN IPPC phytosanitary standards (reference (a)), if such standards have been implemented.

5.2. Existing WPM. DoD Components shall prevent non-compliant WPM from entering the inventory. Non-compliant WPM shall be remediated into compliance by taking actions needed to allow application of the DoD mark or IPPC international mark, by the most economic means, prior to entering the Defense Transportation System (DTS). The DoD Components shall remediate non-compliant WPM before it enters the DTS. Prior to shipment, DoD Components shall inspect, treat, replace, or repack non-compliant WPM using the most economical solution that meets the required delivery date.

5.3. Shipment Inspection. The DoD Components shall visually inspect incoming shipments for DoD or international wood packaging certification marking. If marking is not present, report the non-compliance and determine disposition as stated below.

5.3.1. Report Non-Compliance. For shipments determined to be non-compliant, prepare an SF 364, Supply Discrepancy Report (SDR), per the Joint Service Instruction/Regulation DLAI 4140.55A/AR 735-11-2/SECNAVINST 4355.18A/AFJMAN 23-215, Reporting of Supply Discrepancies. Cite "Improper Packaging" and/or "Improper Packing" on the SF 364. Provide specific non-compliant information in the remarks section. Complete an SF 1080, Voucher for Transfers between Appropriations and/or Funds. If possible, attach photographic evidence to substantiate the claim for the recoupment of funds expended in bringing the shipment into compliance.

Interim Policy on Phytosanitary Measures for Wood Packaging Material (WPM) Transiting International Borders

5.3.2. Determine Disposition.

5.3.2.1. Compliant WPM. If the reusable shipping and storage container is compliant, the container shall be utilized for return of approved items. Other compliant WPM shall be recycled and reused in local applications (i.e., packing and shipping operations). Compliant WPM that cannot be recycled shall be properly disposed of under host nation laws and governing DoD or Military Service regulations.

5.3.2.2. Non-Compliant WPM. Non-compliant WPM shall be disposed of as required under host nation laws or treated by one of the two approved methods to bring the WPM into compliance.

5.3.2.3. Local Service Contract for Disposition. In locations where non-compliant WPM cannot be remediated the material shall be disposed of by a local service contracts, if necessary.

5.4. Documentation. The DoD Components shall maintain documentation throughout the process. WPM certification markings shall allow easy identification of compliant WPM. Markings include the international IPPC or DoD “Pest Free” certification markings. The DoD Components shall monitor all incoming WPM to ensure non-compliant serviceable WPM shall not re-enter the supply system. The DoD Components shall maintain a record for all discrepant receipts and a SDR prepared and forwarded to the shipping activity for corrective action and trend analysis. DoD Components can reuse non-compliant WPM after processing it through a certified heat chamber and applying the proper markings, or perform the inspection and apply the DoD “Pest Free” certification marking. If circumstances preclude the use of a heat chamber, alternate processes are available with prior approval. If reuse is not feasible, WPM shall be disposed of using environmentally safe methods. Repacking and disposal costs associated with non-compliant WPM receipts shall be the responsibility of the owner of the stock directing shipment (i.e. last identified shipper or item manager).

5.5. DoD Site Certification. To be considered a DoD certified WPM site, the installation commander shall:

5.5.1. Establish a WPM focal point at each local certified site. The focal point shall be responsible for maintaining WPM data for audit purposes.

5.5.2. Appoint WPM site “DoD Pest Free” and international certification mark custodians.

5.5.3. Maintain international and DoD “pest free” certification records. The records shall include:

5.5.3.1. A copy of the DOD Component’s specific WPM implementation guidelines.

Interim Policy on Phytosanitary Measures for Wood Packaging Material (WPM) Transiting International Borders

5.5.3.2. Documents pertaining to the number and use of DoD “pest free” marks using stamps provided by the DoD Stamp Administrator.

5.5.3.3. A list of individuals who successfully completed the DOD WPM Self Certification training (Navy web site).

5.5.3.4. The board feet amount of heat treated (HT) lumber receipted for and used on a monthly basis.

5.5.3.5. The inspection, testing, and marking of existing WPM in accordance with the DOD Phytosanitary requirements for WPM.

5.5.4. Document Retention. WPM records retention at each certified site shall be for a period of not less than two years. DoD Components may specify retention requirements for other documents or records. On-site audits shall review all of the above for completeness and accuracy.

5.6. Certification Markings. DoD Components shall apply appropriate certification markings as required and defined herein. Certification markings shall be indelible and permanent. They may be stamped, stenciled, or branded directly onto or into the WPM. On pallets, the marking shall be applied to the stringer or block on opposite sides or ends of the pallet and be clearly visible. On containers, the marking shall be applied on a side other than the top or bottom and clearly visible. If possible, these markings should be adjacent to the container identification markings. On dunnage, the marking shall be applied to opposite surfaces of each piece. If possible, the mark shall be visible when the dunnage is placed in the load to enable inspectors to verify the WPM’s compliance without unloading or unstuffing the container.

5.6.1. DoD “Pest Free” Mark. All WPM in DoD inventories as of March 1, 2005, that are not in compliance with UN IPPC standards (reference(a)), but have passed the moisture test and visual inspection standards, below, may be stamped, stenciled, or branded with the DoD “Pest Free” mark. The DoD “Pest Free” marking shall display the letters “DoD”, the words “Certified Pest Free”, and the Department of Defense Activity Address Code (DoDAAC) (see Figure 1).

Figure 1. DoD “Pest Free” Certification Mark



Interim Policy on Phytosanitary Measures for Wood Packaging Material (WPM) Transiting International Borders

The DoDAAC or DDC code provides receivers and shippers of DoD stock with the identification of the original packaging or shipping activity. Apply this mark only in those instances where the preparing activity inspects existing stock prior to shipment to ensure that the WPM being used for shipment successfully passed the moisture content test and visual inspection criteria.

5.6.1.1. Inspection of Existing Stock. Inspect existing WPM for compliance using the following moisture test and visual inspection standards. If the pack date is less than five years and is not packaged in compliant WPM, it shall be inspected to ensure the WPM is bark free, contains no bore holes larger than 3mm, and the moisture content is less than 20 percent. If the pack date is five years or older, it shall be inspected ensuring the WPM is bark free, contains no bore holes larger than 3mm, and no evidence of other pest infestation. When packaging is inspected and found compliant, it shall be marked as pest free with the DoD pest free mark. The IPPC international mark may not be used for this inspection and certification scheme. All inspection criteria must be met or the packaging is considered non-compliant and remedial action shall be performed.

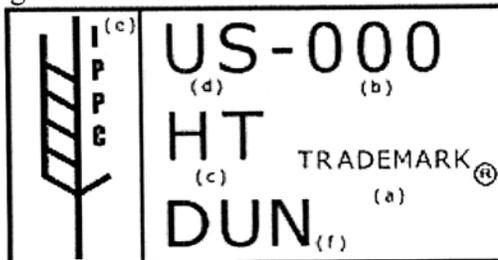
5.6.1.2. Exemption Timeline. This inspection process and marking is an interim exemption only for WPM shipments into and among the European Community (EC) nations and is accepted by USDA APHIS and U.S. Customs and Border Patrol (CBP) for imports into continental United States (CONUS) of retrograde materiel packed in WPM. The EC nations initiators of WPM infestation treatment and markings, allowed the U.S. DoD time to either use or methodically and cost effectively repack materiel in long-term storage into acceptable WPM. The DoD "Pest Free" stamp cannot be applied to DoD WPM having a date of pack later than February 28, 2005, per an EC notification to the World Trade Organization. After December 31, 2007, all DoD WPM shipped into, or amongst EC member nations must meet ISPM 15 requirements, as the DoD "Pest Free" stamp will no longer be an acceptable export shipment marking for WPM compliance.

5.6.2. International Certification Mark. DoD Components that are self-certified and audited per this memorandum, or are using an accredited host nation National Plant Protection Organization (NPPO) WPM service provider, or are American Lumber Standards Committee (ALSC) accredited, are authorized to use the UN International mark on all WPM that fully complies with the IPPC guidelines in reference (a). The DoD International certification marking authorized by the UN, shall display the letters "US" in bold, the packaging activities DODAAC or DDC code (e.g., DDSP, DDJC, etc.), and either "HT" denoting Heat Treated WPM or "MB" denoting WPM treated or "fumigated" with Methyl Bromide shall be inserted as applicable as noted in the Figure 2 by "YY." The marking "DOD", representing the logo of the U.S. services can be displayed under the DODAAC.

Interim Policy on Phytosanitary Measures for Wood Packaging Material (WPM) Transiting International Borders

Apply the international mark when:

Figure 2. International Certification Mark



- Notes:
- a. Trademark - the identifying symbol, logo, or name of the accredited agency
 - b. Facility Identification - the packaging activity's DODAAC or DDC code (e.g., DDSF, DDJC, etc.)
 - c. Heat Treated or Methyl Bromide mark
 - d. Country Code - US
 - e. Approved International symbol for compliant wood packaging material
 - f. Used strictly for dunnage, otherwise left blank.

5.6.2.1. WPM New Fabrication. DoD activities assemble or build WPM in accordance with ISPM 15, recognized USDA APHIS, or host NPPO country recognized programs, which are acceptable for importation into the US. Certified wood procured commercially and the containers, pallets, etc., constructed from that wood shall display the IPPC mark.

5.6.2.2. WPM Repair. DoD activities construct or repair WPM products utilizing compliant wood acquired commercially shall mark the products they construct or replacement wood using the DoD international mark, treatment code, and their DoDAAC. This only applies to repairs if the entire original WPM product was in compliance with ISPM 15. Existing DoD WPM inventory that is repaired using compliant wood and that is unmarked or marked with the unique DoD "Pest Free" mark shall NOT be marked with the international mark because such WPM product is not compliant with the UN IPPC guidelines. The DoD "Pest Free" mark will be used if necessary (see 5.6.1).

5.6.2.3. Kiln Drying Operations. The DoD primary method of WPM compliance is HT. The DoD does not process raw lumber through heat chambers. All DoD activities that have procured and trained personnel to operate wood HT chambers or kilns to process lumber or WPM products (e.g., wooden boxes, pallets, skids, drums, etc.) to UN IPPC standards (56° C (core temperature) for minimum of 30 minutes) shall be enrolled with and audited by an approved ALSC or host nation accredited agency. As part of the contract, the accredited agency furnishes that activity with the agency's ALSC or host nation-approved WPM stamp for certification purposes. When WPM is heat treated, the treating facility shall apply

Interim Policy on Phytosanitary Measures for Wood Packaging Material (WPM) Transiting International Borders

their respective international mark. If located on an outside CONUS (OCONUS) site and the host nation does not have an NPPO or IPPC WPM Program, the DoD activity shall self-certify and mark lumber and WPM that has been HT in a heat treatment chamber or kiln with the DoD markings.

5.6.2.4. Methyl Bromide Fumigation. Fumigation is an authorized treatment of WPM, although DoD does not recommend this option. The USDA APHIS has given the responsibility for fumigation compliance of the WPM UN IPPC guidelines to NWPCA. The NWPCA Enforcement Committee compliance memorandum dated September 27, 2002 is available through the <http://www.nwpc.com/> web site. Fumigation in the United States shall be performed by a licensed pesticide applicator following U.S. Environmental Protection Agency-approved label specification of the fumigant used. Methyl bromide is the only fumigant authorized for program use. Fumigated WPM is to be certified with the international mark. Service approval is required for use of this process.

5.6.2.5. Chemical Pressure Impregnation (CPI). DoD does not recognize this option.

5.6.2.6. Other Preservative Treatments. Wooden boxes, crates, pallets, etc., may require the application of an additional preservative to meet storage or environmental requirements. Many ammunition boxes and pallets require a wood preservative and a specific marking to identify the preservative used (i.e., PA, PB, or PC). Heat treatment and its certification marking shall take place prior to any additional preservation application.

5.7. Shipment. The DoD Components shall ensure 100 percent compliance with the measures and standards regarding shipments of WPM. If the consignor's inspection indicates the WPM is not in compliance with UN IPPC guidelines (reference(a)), the materiel shall not be offered for shipment. The shipper shall evaluate and select one of the compliance options to meet the WPM UN IPPC guidelines. In the event shipments are frustrated by a member state (nation), the carrier (military or commercial) shall notify the consignor (shipper) and/or consignee (addressee) to determine required actions. At this point, DoD shall exercise actions and/or options depending on the circumstances of the quarantined/frustrated shipment (i.e. member nation procedures/requirements, amount of WPM involved, value and priority of shipment, and DoD presence/non-presence at port of debarkation (POD), location of consignee). Remediation costs shall be recouped from the last identified shipper or owner of the materiel.

5.7.1. Remediation. Remediate frustrated shipments depending on circumstances, carrier policies/procedures, and member/host state requirements. Options include:

5.7.1.1. Inspect, certify, and mark at POD. Contingent upon capabilities of POD personnel providing the appropriate level of expertise.

Interim Policy on Phytosanitary Measures for Wood Packaging Material (WPM) Transiting International Borders

5.7.1.2. Replacement. If WPM can not be remediated, replace the non-compliant wood. If the capability and capacity exists for repackaging at the POD, and it is authorized by the host/member nation, shipments shall be repackaged and forwarded to the final destination. An SDR shall be prepared and the shipper shall reimburse the repackaging costs. Non-compliant WPM shall be disposed of in accordance with local procedures. If required, the last identifiable shipper or materiel owner shall pay disposal costs.

5.7.1.3. Consignee pick-up of shipment at POD. If authorized by member/host nation authorities and the consignee is able to pick up the shipment at the POD, consignee may remove the non-compliant WPM, transport the shipment to its destination and dispose of the non-compliant WPM in accordance with local procedures.

5.7.1.4. Return to origin. If the above options are not feasible, the shipment shall be returned to the shipper, at their expense, in accordance with carrier policies and procedures.

5.7.2. Reporting. Shipments frustrated at POD or any reports of non-compliance requiring intervention shall be reported to combatant command/agency components, the consignee, and consignor. If the level of frustrated shipments reaches an unacceptable level, the above shall notify the U.S. Transportation Command for further action.

5.8. Management Controls. The DoD Components shall report, audit, and enforce WPM standards and measures. Audit and enforcement management shall use a centralized web site and include on-site inspections or other Component specified reporting requirement. Each Activity certifying WPM shall be audited in accordance with the following DoD audit procedures.

5.8.1. Reports. DoD Component activities shall provide monthly reports, coordinated through their chain-of-command, to the DoD centralized web site or other Component specified reporting requirement. The reports must be posted to the DoD centralized web site or are due as specified in the other Component specified reporting requirement within two weeks of the end of the reported month. The following reporting instructions, as a minimum, are required:

5.8.1.1. Activities using the DoD "Pest Free" certification will maintain records of certified materiel by documenting the following information: requisition number, item national stock number (NSN), moisture reading, visually inspected for boreholes over 3 mm in diameter (Yes/No), quantity of WPM marked, inspector's signature verifying WPM meets DoD requirements and WPM is properly marked, and the date of certification. This information will be maintained at the activity level for verification during on-site audits. A monthly roll up of the number of instances and quantity of WPM certified DoD "Pest Free" will be provided as specified in paragraph 5.8.1.

Interim Policy on Phytosanitary Measures for Wood Packaging Material (WPM) Transiting International Borders

5.8.1.2. Activities fabricating new WPM or repairing WPM with new lumber and applying the international certification mark will track the following:

5.8.1.2.1. Lumber receipts including the receipt or requisition number, mill code, lumber NSN or identification number, lumber thickness, lumber width, lumber length, quantity received, and date of receipt. This information will be maintained at the activity level for verification during on-site audits.

5.8.1.2.2. Lumber used including the cut and fabrication work order, lumber NSN or identification number, lumber thickness, lumber width, lumber length, quantity received, and date of fabrication. This information will be maintained at the activity level for verification during on-site audits.

5.8.1.2.3. A lumber usage report will be prepared identifying the lumber on hand at the beginning of the month, lumber received, lumber used, and final inventory of lumber on hand at the end of the month. This monthly roll up of lumber usage for International certification will be provided as specified in paragraph 5.8.1.

5.8.2. Audits. DoD audit procedures have been developed to effectively monitor, enhance, and ensure compliance in a positive way. Audits complying with the DoD Certifying WPM Program will be further defined in each DoD component's internal instruction. Minimum required information for auditing, as well as construction and inventory, is detailed in the Self Certification Course that is resident on the DoD WPM web site (The Naval Inventory Control Point (NAVICP) Code 07 web site: https://www.icptarp.net/wpm/wpm_training.nsf/wpm+home?openpage). Each DoD Component has the authority to elect to utilize one or more of the following methods for the auditing of their individual Service/Agency as are compatible with their requirements.

5.8.2.1. Facilities treating WPM shall be audited and approved through the U.S. program sanctioned by the USDA and administered by the ALSC or NWPCA.

5.8.2.2. Audits conducted by the DoD Component command inspectors or auditors shall use, to the extent feasible, the procedures and information used by ALSC.

5.8.2.3. Audits conducted using a combination of the DoD on-line report validation program coupled with on-site audits at major consolidation hubs or nodes shall be conducted using trained inspectors who are independent of the packaging and crating operation. This conforms to the procedures and information used by the ALSC. Components electing this method shall comply with the following procedures:

Interim Policy on Phytosanitary Measures for Wood Packaging Material (WPM) Transiting International Borders

5.8.2.3.1. On-line Report Validation. Participating DoD activities authorized to use either the international or DoD “Pest Free” certification marks shall submit monthly usage reports which will be validated monthly using the current WPM standards published on the DoD WPM web site.

5.8.2.3.1.1. Each participating activity shall register their DoDAAC/UIC and Site Custodian Point of Contact (POC) via the DoD WPM web site.

5.8.2.3.1.2. Each validating Activity shall register their DoDAAC/UIC and WPM Program Manager via the web site.

5.8.2.3.1.3. The WPM Program Manager or DoD Component POC shall validate the monthly reports (see paragraph 5.8.1)

5.8.2.3.1.4. The activity POC shall attach and forward required records to the service/agency WPM program manager (PM) for evaluation.

5.8.2.3.2. On-Site Audits. Trained auditors who are independent of the packaging and crating operations shall perform annual on-site audits. Auditors shall:

5.8.2.3.2.1. Physically inspect DoD Certified material stamped/stenciled with the international or DoD “Pest Free” marks to ensure compliance.

5.8.2.3.2.2. Document discrepancies or compliance data and forward to the service/agency WPM PM for comparison with on-line/collected audit verification data.

5.8.2.3.2.3. Review the records of all incoming lumber, outgoing WPM, and shipments containing WPM ensuring compliance and take appropriate action as required.

5.8.2.3.2.4. Review personnel training records verifying workers involved with WPM have successfully completed the DoD web based training course.

5.8.2.3.2.5. Identify certification stamps are properly controlled.

5.8.2.3.2.6. Provide detailed report of the audit and status of the DoD WPM Program through their chain-of-command WPM POCs to their DoD Component WPM POC.

Interim Policy on Phytosanitary Measures for Wood Packaging Material (WPM) Transiting International Borders

5.8.3. WPM On-line Automation Tools.

5.8.3.1. Standardization of Forms/Data. All appropriate forms are available to be downloaded from the DoD web site. The DoD WPM web site is the central point for training, monitoring, auditing, and certification of DoD and contractor personnel.

5.8.3.2. Audit Results Reporting. Each DoD Component activity performing WPM certification shall be provided with a link for review of verification results. Audited organizations shall be provided with results and constructive recommendations when required. An annual summary report shall be provided to each DoD Component representative.

5.8.4. Consequences Of Audit Failure/Non-Compliance.

5.8.4.1. Commercial and DoD Component activities repairing or fabricating WPM to ALSC/NWPCA requirements shall receive warnings, suspensions and withdrawal of ALSC quality stamp marking privileges for non-compliance as specified in ALSC/NWPCA enforcement regulations.

5.8.4.2. At DoD site-certified WPM activities (see 5.5 above), the following procedures apply to audit failures (non-conformance to WPM requirements at an aerial or shipment ports, or CCP), or reported valid non-compliance:

5.8.4.2.1. First Audit Failure/Reported Non-Compliance. After notification of the first audit failure/non-compliance, the site WPM mark custodian shall, within fifteen days, provide written analysis of problem and proposed solution to the responsible auditing organization and to the DoD Component's POC (representative to the Defense Packaging Policy Group (DPPG)). The site shall be re-audited within thirty days to determine if process improvements have been implemented and are sufficient to resolve the discrepancy.

5.8.4.2.2. Second Audit Failure/Reported Non-Compliance. A second audit failure/non-compliance within the thirty days requires more involvement as follows:

5.8.4.2.2.1 Within fifteen days of the second failure provide written analysis of problem and proposed solution to the responsible auditing organization (see Section 5.8 above) and to the WPM Component POC.

5.8.4.2.2.2 The site shall be re-audited within sixty days by the WPM Program Manager or WPM Component POC to

Interim Policy on Phytosanitary Measures for Wood Packaging Material (WPM) Transiting International Borders

determine if process improvements have been implemented and are sufficient to resolve the discrepancy.

5.8.4.2.3 Third Audit Failure/Reported Non-Compliance. Another audit failure within the 60 days:

5.8.4.2.3.1. If the breakdown is the result of a failure to maintain required documentation or to contract for the delivery of the proper WPM, the DoD site certification may be withdrawn. The facility shall contact ALSC for monthly commercial inspections, contract with a local ALSC operation, or send materiel to another DoD self-certified site. The facility shall be responsible for all costs associated with actions from a third failure.

5.8.4.2.3.2. If the failure is related to the shipment of defective packaging, the installation/shipper shall be responsible for repack costs and/or the demurrage costs, all installation personnel may have their certifications removed and shall be required to retake the WPM certification on-line training prior to being reauthorized to apply use the certification marks.

5.8.4.2.3.3. After one year, the site may reapply for DoD site certification. All wood fabricators/packers shall retake the individual certification test for site wood packing re-certification.

5.9. Training. The DOD Components shall utilize the DoD comprehensive WPM web based training course. The site address is: https://www.icptarp.net/wpm/wpm_training.nsf/wpm+home?openpage . This course is available to all Services, Military, DOD civilian, and contractor personnel operating Government Owned, Contractor Operated (GOCO) facilities. The course addresses and provides self-certification and familiarization training. This course covers current WPM UN IPPC guidelines. The course is divided into six sections. After each section a short quiz is given to review the information provided. At the end of the six sections, personnel shall successfully complete an in-depth final examination. Personnel shall undergo refresher training once every two years. This practice shall ensure packers, wood fabricators, and assemblers stay current with UN IPPC, APHIS, and DOD WPM policy and procedural changes.

6. EFFECTIVE DATE: This interim policy is effective for six months from the date of signature or until a DoD Manual on WPM is published, whichever comes first.

Interim Policy on Phytosanitary Measures for Wood Packaging Material (WPM) Transiting International Borders

DEFINITIONS/TERMS OF REFERENCE

D.1. American Lumber Standard Committee (ALSC). The ALSC, comprised of manufacturers, distributors, users, and consumers of lumber, serves as the standing committee for the American Softwood Lumber Standard (Voluntary Product Standard 20) and in accordance with PS 20, administers an accreditation program for the grade marking of lumber produced under the system. The ALSC also administers accreditation programs for the quality marking of treated lumber produced under standards written and maintained by the American Wood Preserver's Association (AWPA) and for the labeling of wood packaging material.

D.2. Bark-Free Wood. Wood from which all bark excluding the vascular cambium, ingrown bark around knots, and bark pockets between rings of annual growth has been removed [ISPM Pub. N° 15, 2002].

D.3. Dunnage. WPM used to secure or support a commodity but which does not remain associated with the commodity [FAO, 1990; revised ISPM Pub. N° 15, 2002].

D.4. International Plant Protection Convention (IPPC). An international treaty relating to plant health, to which 141 governments, including the U.S.A., currently adhere. Its main purpose is to secure action to prevent the spread and introduction of pests of plants and plant products, and to promote appropriate measures for their control.

D.5. International Standard for Phytosanitary Measure. Reference (a) which is international standard adopted by the Conference of Food and Agriculture Organization (FAO), the Interim Commission on Phytosanitary measures or the Commission on Phytosanitary measure, established under IPPC.

D.6. National Wooden Pallet & Container Association (NWWPA). The international trade association that represents manufacturers, recyclers, and distributors of pallets, containers, and reels.

D.7. Phytosanitary. Plant health including the protection of natural flora and plant products including direct and indirect damage by pests.

D.8. Phytosanitary action. An official operation, such as inspection, testing, surveillance or treatment, undertaken to implement phytosanitary regulations or procedures [ICPM, 2001].

D.9. Processed wood material. Products that are a composite of wood constructed using glue, heat and pressure, or any combination thereof [ISPM Pub. N° 15, 2002] Examples are plywood, particleboard, oriented strand board, veneer, wood wool, etc.

D.10. Wood Packaging Material (WPM). Wood or wood products (excluding paper products) used in supporting, protecting, or carrying a commodity (includes dunnage)

**Interim Policy on Phytosanitary Measures for Wood Packaging Material (WPM)
Transiting International Borders**

[ISPM Pub. N° 15, 2002]. Examples of WPM include but are not limited to pallets, skids, pallet collars, containers, crates, boxes, cases, bins, reels, drums, load boards, and dunnage. Wood packaging made of exempt materials but combined with solid wood components must still be treated and marked. Does not include processed wood materials and manufactured wood products. (WPM was previously known as Non-Manufactured Wood Packaging or Solid Wood Packaging Material)

D.11. WPM Compliance. Complying with reference (b), this interim policy and, as applicable, implementation of reference (a) by U.S. allies, and other friendly governments.