



MPI Technical Standard: Certification Mark for Wood Packaging

20 September 2024

TITLE

Plant Export Requirement: MPI Technical Standard: Certification Mark for Wood Packaging

COMMENCEMENT

This Plant Export Requirement is effective from the date of issue.

REPLACEMENT

This Plant Export Requirement replaces the MPI Technical Standard: Certification Mark for Wood Packaging, dated 10 June 2024.

ISSUING BODY

This Plant Export Requirement is issued by the Ministry for Primary Industries.

Dated at Wellington, 20 September 2024

Stephen Collier
Acting Director Assurance
Ministry for Primary Industries
(acting under delegated authority of the Director-General)

Contact for further information
Ministry for Primary Industries (MPI)
New Zealand Food Safety
Assurance Directorate
PO Box 2526,
Wellington 6140

Email: PlantAssurance@mpi.govt.nz

Contents	Page
Introduction	3
Part 1: MPI principles for the use of the ISPM 15 mark	6
Part 2: Requirements	7
2.1 Regulated wood packaging material	7
2.2 Requirements for all participating organisations	7
2.3 Organisations that apply the ISPM 15 mark	8
2.4 Organisations that manufacture and alter wood packaging	12
Appendix 1 – Examples of ISPM 15 marks	14
Examples of compliant ISPM 15 marks	14
Examples of non-compliant ISPM 15 marks	15
Appendix 2 – Examples of traceability stages	17

Introduction

This introduction is not part of this Plant Export Requirement: MPI Technical Standard (Standard), but is intended to indicate its general effect.

Purpose

The purpose of this Standard is to specify the minimum technical requirements for the:

- application of the mark described in Annex 2 of the international standard for phytosanitary measures: ISPM No. 15 (referred to as “the ISPM 15 mark” or “the mark” in this standard) to wood packaging material;
- ongoing management, on behalf of the Ministry for Primary Industries (MPI), of wood packaging material that bears the ISPM 15 mark.

Background

This Standard is an integral part of the MPI system for official assurances for the export of plants and plant products. It describes the responsibilities of MPI Approved Organisations (MAOs), MPI Approved Treatment Providers (MATPs) and Independent Verification Agencies (IVAs) involved in the application of the ISPM 15 mark to wood packaging material and its ongoing management.

The MPI regulatory model for plant exports operates through authorised IVAs and MAOs undertaking services on MPI's behalf.

New Zealand is a contracting party to the International Plant Protection Convention (IPPC). The International Standard for Phytosanitary Measures 15 “*Regulation of wood packaging material in international trade*” (ISPM 15) is published by the IPPC. Each contracting party has a National Plant Protection Organization (NPPO) whose responsibilities under ISPM 15 include authorising treatment and application of the mark. MPI is New Zealand's NPPO.

Pests associated with wood packaging material are known to have negative impacts on forest health and biodiversity. The ISPM 15 mark attests to the wood packaging material having little or no bark and being treated in compliance with the ISPM 15 standard. This enables compliant wood packaging to move freely in trade between most countries.

Compliance with ISPM 15 significantly reduces the risk of the introduction and spread of most pests of living trees that may be associated with wood packaging material. Compliance with ISPM 15 does not, however, achieve ongoing protection from contaminating pests or other material.

It is possible to be compliant with ISPM 15 requirements and still be non-compliant with the requirements of an importing country that has adopted ISPM 15 for import. This can happen when the wood packaging becomes infested with pests or contaminated with regulated material such as soil and plant material. In such cases the importing country is likely to require the importer to have the wood packaging re-treated, re-shipped or destroyed. Exporters should therefore use ISPM 15 compliant wood packaging and ensure it remains free of contaminating pests and materials through to the point of export.

Who should read this?

This Standard applies to:

- organisations approved, or seeking MPI approval, to apply the ISPM 15 mark to wood packaging; and

- organisations approved, or seeking MPI approval, to construct or alter wood packaging already bearing the mark.

Why is this important?

Most countries accept compliance with ISPM 15 as the basis for authorising the entry of wood packaging material without further specific requirements.

Wood packaging that complies with this Standard and remains uncontaminated can move freely in trade between most countries.

MAOs, MATPs or IVAs operating other than in accordance with this Standard may lose their MPI approval to provide this service.

Document history

Version Date	Section Changed	Change(s) Description
20 September 2024	Clause 2.3.3 (1)	Amended wording to align with other sections
	Clause 2.3.3 (1) e)	Removed reference to subclause 2.1.1(1)g
10 June 2024	Whole document	Full review and re-issue of this Plant Export Requirement.
25 March 2015	Whole document	Full review and re-issue of this Plant Export Requirement.
5 March 2010		First issued

Other information

Requirements versus Guidance

Requirements of this Standard are presented as numbered clauses and schedules. Requirements are mandatory. They present:

- requirements that must be met;
- prohibitions that must be met; and
- allowances/approvals that may be approved, provided set conditions are met.

The information contained within a border throughout this document is for guidance and is not part of the requirements. Guidance is not mandatory.

Guidance

- This is an example of a guidance box.

Guidance may include:

- interpretative material or further explanation;
- help for where the reader can find more information; and
- examples or indications of preferred ways of doing things.

MAOs, MATPs and IVAs do not have to show that they have followed guidance.

Useful reference information

- This Standard should be read in conjunction with MPI Certification Standard: Organisation Requirements and MPI Certification Standard: Assurance System Framework which includes references and definitions applicable to this Standard.
- International standard for phytosanitary measures: ISPM No. 5 *Glossary of phytosanitary terms*. Produced by the Secretariat to the International Plant Protection Convention. Food and Agriculture Organization of the United Nations.
Note: the definitions in ISPM 5 apply for terms used in this Standard that are not defined in MPI Certification Standard: Assurance System Framework including definitions for “bark”, “debarked wood”, “dunnage”, “processed wood material” and “wood packaging material”.
- International standard for phytosanitary measures: ISPM No. 15 *Regulation of wood packaging material in international trade*. Produced by the Secretariat to the International Plant Protection Convention. Food and Agriculture Organization of the United Nations.
- Explanatory document for ISPM 15 (Regulation of wood packaging material in international trade). Adopted 2017, Published 2019. Produced by the Secretariat to the International Plant Protection Convention. Food and Agriculture Organization of the United Nations.
- Guide to the regulation of wood packaging material - Understanding the phytosanitary requirements for the movement of wood packaging material in international trade: Produced by the Secretariat to the International Plant Protection Convention. Published 2023. Food and Agriculture Organization of the United Nations.
- Trade Marks Act 2002.

Part 1: MPI principles for the use of the ISPM 15 mark

- (1) The IPPC symbol is a registered trade mark in New Zealand. MPI authorises the use of the IPPC symbol in New Zealand as a component of the ISPM 15 mark.
- (2) The unauthorised use of the registered IPPC symbol (or a deceptively similar mark) on wood packaging in New Zealand is an infringement of the Trade Marks Act 2002.
- (3) The ISPM 15 mark must only be applied to wood packaging material:
 - a) by an MAO, MATP or IVA with the appropriate scope of approval;
 - b) that has been debarked and officially treated in compliance with ISPM 15.
- (4) Wood packaging material units that bear the ISPM 15 mark must only be structurally altered by an MAO, MATP or IVA.
- (5) Wood packaging material that is not structurally altered and bears the ISPM 15 mark may be re-used without restriction for the service life of the wood packaging unit.

Part 2: Requirements

2.1 Regulated wood packaging material

- (1) This Standard applies to wood packaging such as crates, boxes, packing cases, dunnage, pallets, cable drums and spools/reels, which can be present in traded consignments, including consignments that would not normally be subject to phytosanitary inspection.

2.1.1 Exemptions

- (1) The following articles are of sufficiently low risk to be exempted from the requirements of this Standard:
- wood packaging material made entirely from thin wood (6 mm or less in thickness);
 - wood packaging made wholly of processed wood material, such as plywood, particle board, oriented strand board or veneer that has been created using glue, heat or pressure, or a combination thereof;
 - barrels for wine and spirit that have been heated during manufacture and constructed in a manner that renders them pest free;
 - gift boxes for wine, cigars and other commodities made from wood that have been processed and/or manufactured in a way that renders them pest free;
 - sawdust, wood shavings and wood wool;
 - wood components permanently attached to freight vehicles and containers; and
 - dunnage used to support consignments of timber that is of the same type and quality and meets the same phytosanitary requirements as the timber in the consignment.

2.2 Requirements for all participating organisations

- (1) Organisations seeking MPI approval to apply the ISPM 15 mark to treated wood packaging material, or alter wood packaging material that bears the mark must:
- be an authorised MAO, MATP or IVA;
 - implement documented procedures for the:
 - relevant clauses for application of the mark in Part 2.3, or altering wood packaging bearing the mark in Part 2.4; and
 - management of non-conforming wood packaging material in Part 2.2.2.

Guidance

- The use of the term “organisation” in this Standard applies to MAOs, MATPs and IVAs unless stated otherwise.
- The process for MPI authorisation of IVAs and the requirement for documented procedures is described in the [MPI Certification Standard: IVA Requirements](#).
- The process for MPI approval of MAOs and the requirement for documented procedures is described in the [MPI Certification Standard: Organisation Requirements](#).

Each organisation site that applies the ISPM 15 mark is listed on the MPI approved organisation register. This is available on the MPI web site: <https://www.mpi.govt.nz/>

- Sites that apply the mark directly to wood packaging in clause 2.3(1)a) are listed on the MPI approved organisation register together with a unique producer/treatment provider code assigned by MPI.
- Please email PlantAssurance@mpi.govt.nz if the unique producer/treatment provider code on a new unit of NZ wood packaging is not on the MPI register.

2.2.1 Staff competency

- (1) General staff competency requirements and competency assessment procedures are specified in the MPI Certification Standard: Organisation Requirements or MPI Certification Standard: IVA Requirements.
- (2) Staff who are responsible for the application of the ISPM 15 mark to wood packaging material, or who are responsible for the manufacture, repair or remanufacture of wood packaging material that bears the mark, must demonstrate:
 - a) ability to correctly determine compliance of ISPM 15 marks (refer to 2.3.2 and 2.3.3)
 - b) understanding of what the treatment code(s) stand for (refer to Table 1); and
 - c) ability to correctly determine compliance with bark tolerances (refer to 2.3.1).

2.2.2 Management of non-conforming wood packaging material

- (1) The organisation's documented procedures must describe how:
 - a) non-conforming wood packaging material is managed by bringing it into conformity, by securely disposing of it or by returning it to the MAO or MATP that supplied the wood packaging material; and
 - b) how the identification, traceability and security of conforming wood packaging material is maintained and differentiated from non-conforming wood packaging material.

Guidance

- To bring non-conforming product back into conformity it may need to be re-treated, debarked or have non-conforming marks obliterated and conforming marks re-applied.
- Recommended methods of securely disposing of non-conforming wood packaging material are incineration, deep burial and using it as feedstock in the manufacture of commodities that have been processed to the point where they do not remain capable of being infested with quarantine pests (refer ISPM 32 Categorization of commodities according to their pest risk).

2.3 Organisations that apply the ISPM 15 mark

- (1) The ISPM 15 mark is applied either:
 - a) directly using mark application devices such as stamps, stencils, printers and branding irons; or
 - b) indirectly by fastening, gluing or otherwise attaching marked wood or marked processed wood material referred to in clause 2.1(1) to unmarked wood.

Guidance

- Examples of indirect mark application includes:
 - construction of bins, boxes or crates (for example squash bins) from ISPM 15 marked and unmarked components;
 - manufacturing pallets using a production process whereby the ISPM 15 mark is applied to treated components prior to nailing; and
 - cutting dunnage that is ISPM 15 marked and then nailing together the resultant mix of marked and unmarked dunnage pieces to secure cargo within a shipping container or ship's hold.

- (2) Organisations that apply the ISPM 15 mark must document and implement procedures for:
 - a) confirming the wood packaging material has been officially treated in accordance with Annex 1 of ISPM 15 before applying the mark;
 - b) confirming the wood packaging material is debarked before applying the mark in clause 2.3.1;
 - c) ensuring the mark is only applied to compliant wood packaging material;
 - d) how the mark is applied; and

- e) identifying and tracing wood packaging material used in manufacturing so that it can be traced from:
 - i) the treatment and manufacture stage (or treatment stage only if manufactured prior to treatment), while it is under the control of the manufacturer, then from the manufacturer to the next recipient in the supply chain; or
 - ii) the receipt stage (if treated wood packaging material is sourced from a third party for manufacture) while it is under the control of the manufacturer, then from the manufacturer to the next recipient in the supply chain; or
 - iii) the receipt stage (if treated wood packaging material is sourced from a third party for supporting cargo when loading a freight container or conveyance for export), while it is under the control of the organisation, then to the point of mark application or export.

Guidance

- 'Next recipient in the supply chain' means on sold or transferred to another organisation or business.
- Traceability requirements for treatment suppliers who supply ISPM 15 treated wood packaging material only are contained in the [Treatment Requirement: Treatment Supplier Requirements](#).
- Refer to Appendix 2 for flow chart examples of the traceability stages that MPI expects organisations that apply the mark to demonstrate.

- (3) Within two months of first gaining MPI approval, the organisation's documented system must be amended to include photographic examples of the ISPM 15 mark(s) that the organisation is approved to apply. The examples must:
 - a) meet the specifications for the mark in clause 2.3.2;
 - b) closely resemble all unique marks applied to wood packaging by the organisation; and
 - c) be provided for each type of device on the application device register in clause 2.3.4.

2.3.1 Debarked wood packaging material

- (1) Wood packaging material that is treated by fumigation must be debarked prior to fumigation.
- (2) The wood packaging material must be debarked prior to applying the ISPM 15 mark. However, any number of visually separate and clearly distinct small pieces of bark may remain if they are:
 - a) less than 3 cm in width (regardless of the length); or
 - b) greater than 3 cm in width, with the total surface area of an individual piece of bark being less than 50 square cm.

2.3.2 Specifications for the ISPM 15 mark

- (1) The ISPM 15 mark must include the:
 - a) IPPC certification symbol, presented to the left of the other components and closely resembling the examples illustrated in the following guidance;
 - b) two letter country code 'NZ' for New Zealand separated from the producer/treatment provider code by a hyphen;
 - c) unique producer/treatment provider code assigned to each operational site by MPI; and
 - d) appropriate treatment code as referred to in Table 1, located after the combined country and producer/treatment provider codes, either:
 - i) on a separate line from the country code and producer/treatment provider code; or
 - ii) separated from other codes by a hyphen.

Table 1: ISPM 15 compliant treatment codes

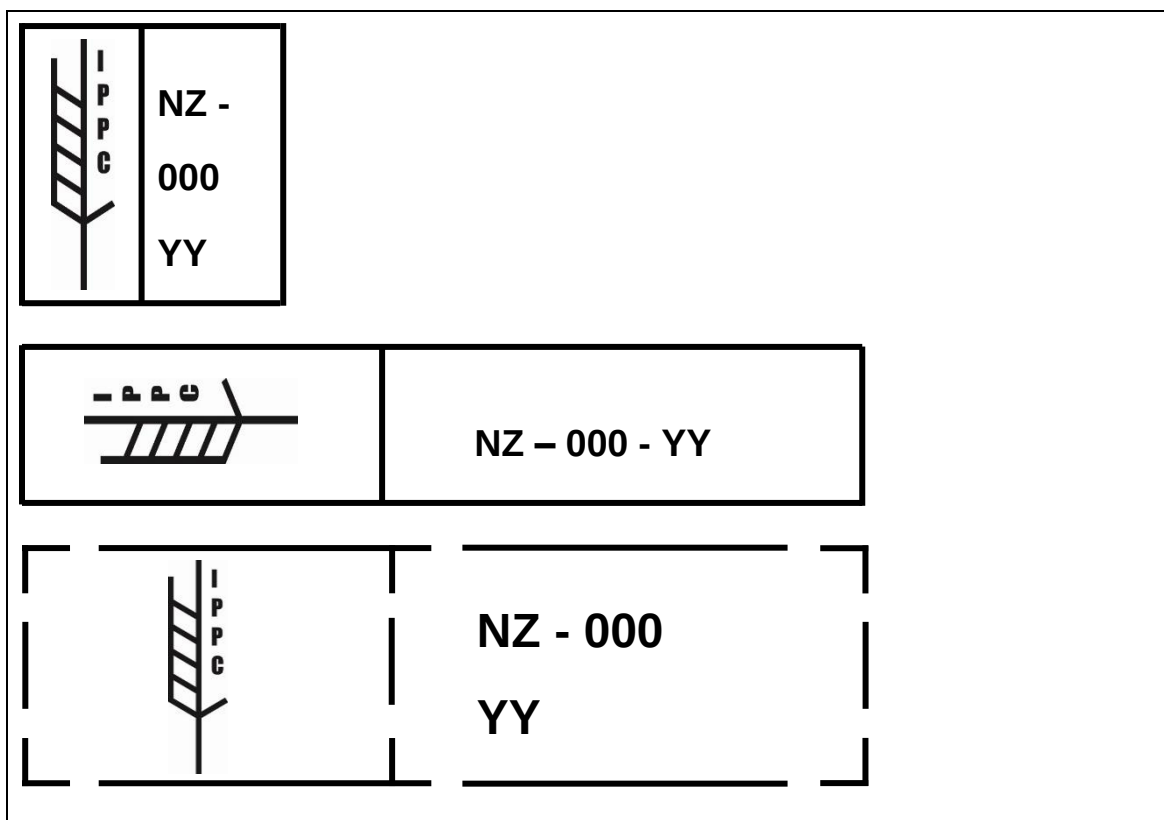
Treatment code	Treatment type
HT	Heat treatment using a conventional steam or dry kiln heat chamber
DH	Heat treatment using dielectric heating
MB	Methyl bromide treatment

- (2) The ISPM 15 mark must:
- a) be rectangular or square in shape and contained within a border line with a vertical line separating the IPPC symbol from the code components; and
 - b) only contain information within the borders of the mark that is specified in clause 2.3.2(1); and
 - c) be of sufficient size to be both visible and legible to a person with normal visual acuity without the use of a visual aid; and
 - d) include all of the components of the mark clearly and distinctly.
- (3) To facilitate the use of stencilling, small gaps in the border, the vertical line and elsewhere among the components of the ISPM 15 mark may be present.

Guidance

- ISPM 15 marks applied to wood packaging with country code “NZ” that do not comply with the specifications for the ISPM 15 mark in this Standard should be reported to your IVA.
- The two letter country code is represented by ‘NZ’.
- The unique producer/treatment provider code is represented by ‘000’.
- The treatment code is an IPPC abbreviation for the approved measure used and shown in the examples as ‘YY’.
- Refer to Appendix 1 for photographic examples of compliant and non-compliant ISPM 15 marks.
- The following are examples of some acceptable variants of the required components of the IPPC registered ISPM 15 mark.

	NZ - 000 YY
	NZ - 000 YY
	NZ - 000 - YY



- (4) The size, font types used and position of the ISPM 15 mark may vary.
- (5) Any additional marks must be outside of the border of the mark.

2.3.3 Applying the ISPM 15 mark

- (1) The ISPM 15 mark must:
- be legible;
 - be durable (permanent) and not transferable;
 - closely resemble the examples shown in the organisation system and be neither hand drawn nor red or orange in colour;
 - be clearly visible when the wood packaging unit is in use;
 - be applied on at least two opposite sides of the wood packaging unit, except for MAOs that manufacture, treat and mark bearers for use in supporting the same MAOs export timber. These MAOs may apply the ISPM 15 mark to a single side of each bearer.
 - only be applied by staff listed in the organisation's register of competent staff.
- (2) If a composite unit is comprised of both exempt processed wood material as referred to in clause 2.1.1 and wood material regulated under this Standard, then the ISPM 15 mark may be applied to the exempt processed wood material components. This is to enable the mark to be visible and of sufficient size.

Guidance

- Options for ISPM 15 marking dunnage are for:
 - applying the mark to dunnage along its entire length at very short intervals so that when cut to length each piece is compliantly marked; and
 - applying the mark to dunnage treated in compliance with ISPM 15 in a visible location after cutting.

2.3.4 Security of application devices

- (1) Devices used to apply the ISPM 15 mark must be:

- a) protected from misuse and stored securely when not in use; and
 - b) used only by competent staff as referred to in clause 2.2.1.
- (2) The organisation must maintain an application device register that:
- a) uniquely identifies each device;
 - b) records when each device is first put into service; and
 - c) records when each device is pulled out of service and how the device was destroyed or rendered permanently unusable.

2.3.5 Records

- (1) In addition to the general record keeping requirements set out for organisations, the following records must be kept:
- a) the registration number assigned to the organisation by MPI;
 - b) treatment records;
 - c) mark application records that demonstrate the competent staff member/s responsible for applying the ISPM 15 mark/s; and
 - d) traceability records retained to a level that allows all treated wood packaging material to be traced as referred to in clause 2.3(2)e).

Guidance

- Examples of treatment records include:
 - a Treatment Certificate or Declaration of Conformity (DOC) from a MATP or MAO who is approved to undertake treatments;
 - an overseas phytosanitary certificate relating to imported timber with details of ISPM 15 compliant treatment completed prior to import into New Zealand.
- Traceability records combined with documented procedures in clause 2.3(2)e) should be sufficient to ensure full traceability or “chain of custody” of treated wood used in the manufacture of wood packaging material. Examples of traceability records include:
 - stock movement data;
 - spreadsheets; and
 - dispatch or customer order records/invoices.
- Mark application and traceability records can state aggregated units, such as packets, batches or lots where practical.

2.4 Organisations that manufacture and alter wood packaging

2.4.1 Manufacturers

- (1) Organisations manufacturing (i.e. constructing) wood packaging units and applying the ISPM 15 mark directly or indirectly must be approved by MPI to apply the mark in clause 2.3.
- (2) Organisations must describe in their procedures how they manage the integrity of the finished units to ensure only ISPM 15 treated timber is used.

Guidance

- Manufacturing includes all activities involved in the construction of wood packaging. This includes nailing pieces of timber to construct a frame or support structure, or to construct a crate or pallet.
- Manufacturing does not include the following activities:
 - completing a wood packaging unit or kit where every wooden component used in its construction is ISPM 15 marked;

- using ISPM 15 marked dunnage to support cargo when loading a freight container or conveyance for export. The timber/dunnage can be sawn into smaller pieces/lengths if the ISPM 15 mark is clearly visible on each cut piece of dunnage.

2.4.2 Repairers

- (1) Organisations repairing wood packaging units already bearing the ISPM 15 mark must document procedures that describe how:
 - a) the wood packaging unit to be repaired:
 - i) is assessed as being ISPM 15 compliant;
 - ii) is assessed as needing no more than one third of its components replaced;
 - iii) will bear no more than three different marks once repaired.
 - 1) Marks are considered to be different if one or more of the following codes are different: country code, treatment code or unique producer/treatment provider code.
 - 2) Wood packaging units with three or more different ISPM 15 marks and needing repair must meet remanufacture requirements in clause 2.4.3(2) and 2.4.3(3).
 - b) the source of the wood packaging material is confirmed as being from an MAO/MATP with appropriate scope;
 - c) every component used in the repair:
 - i) is debarked as referred to in clause 2.3.1; and
 - ii) bears the ISPM 15 mark including the treatment code for the official treatment applied to the component as referred to in clause 2.3.2.

Guidance

- It is possible for ISPM 15 compliant wood packaging repaired in other countries to have more than three different ISPM 15 marks.

2.4.3 Remanufacturers

- (1) Wood packaging that has more than one third of its components removed and replaced is considered to be remanufactured.
- (2) Organisations remanufacturing wood packaging already bearing the ISPM 15 mark must document procedures that describe how:
 - a) the wood packaging unit is assessed as needing more than one third of its components replaced;
 - b) any existing marks are permanently obliterated (for example, by covering with paint or grinding); and
 - c) the remanufactured wood packaging unit is re-treated in accordance with ISPM 15 before the mark is applied as new.
- (3) Organisations remanufacturing wood packaging units and re-applying the ISPM 15 mark must be approved by MPI to apply the mark as referred to in clause 2.3.

Appendix 1 – Examples of ISPM 15 marks

Examples of compliant ISPM 15 marks

Note: This is not a comprehensive list of compliant marks.

Image 1. Ink stamped mark.



Image 2. Printed mark.



Image 3. Stencilled mark.



Image 4. Roll mark with additional information included outside the borders of the mark.



Image 5: Fire-brand stamped mark



Examples of non-compliant ISPM 15 marks

Note: This is not a comprehensive list of non-compliant marks.

Image 6. Missing hyphen and dividing line.



Image 7. Central line missing from IPPC symbol. Border line missing.



Image 8. Mark split in two.



Image 9. Information beyond what is described in clause 2.3.2(1) contained within the borders of the mark.



Image 10. Mark is missing the required borders.



Image 11. Non-compliant positioning of information. Dividing line is missing. Additional information is within the borders of the mark.

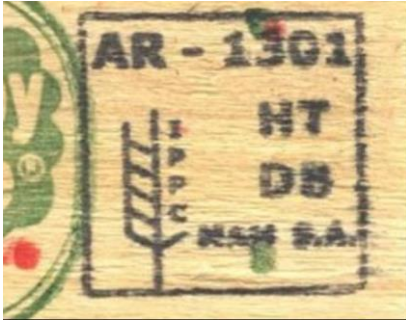


Image 12: Mark is illegible



Images 1, 4, 5, 9, 10, 11 and 12 sourced from Food and Agriculture Organization of the United Nations (FAO). For more examples refer to Appendix 7 of the IPPC Guide to the Regulation of Wood Packaging Material which maybe obtained from the IPPC website at [Regulation of wood packaging material - International Plant Protection Convention \(ippc.int\)](https://www.ippc.int)

Appendix 2 – Examples of traceability stages

Figures 1-3 below provide flowchart examples of the traceability stages that MPI expects organisations that apply the mark to demonstrate.

Note: These are examples only so may not reflect the actual sequence of steps (such as where the mark is applied or point of manufacture) for organisations.

Figure 1. Traceability stages for organisations who are treatment suppliers and manufacturers of wood packaging material as referred to in clause 2.3(2)e)i.

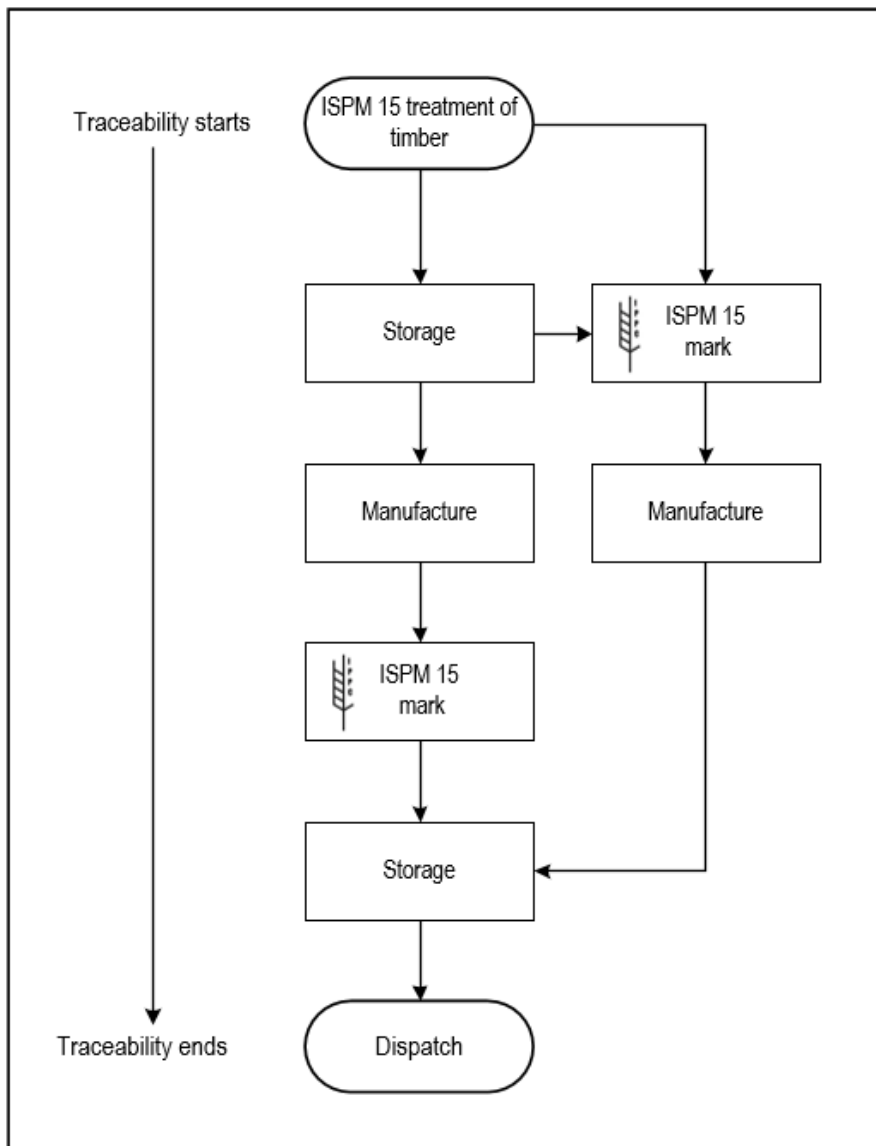


Figure 2. Traceability steps for organisations who are manufacturers of wood packaging material only as referred to in clause 2.3(2)e)ii.

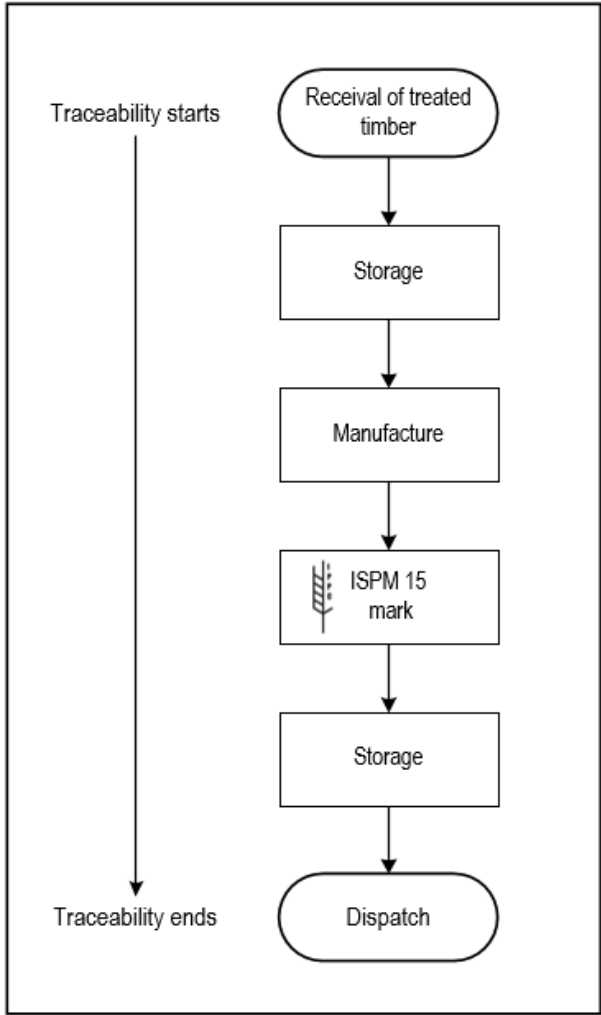


Figure 3. Traceability steps for organisations who purchase wood packaging material and use it to support cargo when loading a freight container or conveyance for export as referred to in clause 2.3(2)e)iii.

