D-98-08

Entry Requirements for Wood Packaging Material into Canada

Effective date: (to be determined) **9th version**

Subject

This directive provides the requirements for the entry of all wood packaging material (WPM) including dunnage, pallets, or crating made from wood and entering Canada from all areas except the continental United States (U.S.).

Revisions

This revision includes specific import requirements for dunnage entering Canada via marine vessels. Non-compliant dunnage and ongoing detection of live pests in both wood packaging material and shipborne dunnage imported into Canada creates increased risk for the entry of injurious pests. A shipborne dunnage management program has been developed and is described in this revision.

This directive has been revised to reflect the amendments made to the International Standards for Phytosanitary Measures (ISPM) 15 regarding approved treatments associated with wood packaging material and the mark and its application (see Appendix 1). The International Plant Protection Convention (IPPC) and its Commission on Phytosanitary Measures have adopted these revisions to provide further guidance to National Plant Protection Organizations (NPPO). These changes were adopted in 2018.

This document supersedes all previous versions of directive D-98-08.

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1 Legislative authority

Plant Protection Act (S.C. 1990, c. 22)

Plant Protection Regulations (SOR/95-212)

Canadian Food Inspection Agency Fees Notice, *Canada Gazette, Part I* (as amended from time to time)

2 Definitions, abbreviations and acronyms

Definitions for terms used in the present document can be found in the International Standard for Phytosanitary Measures 5: Glossary of phytosanitary terms or in the CFIA Plant Health Glossary of Terms.

3 Introduction

The risk represented by wood packaging material and dunnage varies depending on the quality, conditioning, and degree of finishing of the wood. Many exotic plant pests have been intercepted on wood dunnage, pallets, crating, or other wood packaging material in North America. Examples of plant quarantine pests intercepted include: *Anoplophora chinensis, Anoplophora glabripennis, Ips typographus, Hylastes ater, Monochamus* sp., *Trichoferus campestris* and others. The introduction into parts of North America of the Asian longhorned beetle (*Anoplophora glabripennis*), brown spruce longhorn beetle (*Tetropium fuscum*), emerald ash borer (*Agrilus planipennis*), and other exotic pests can now be linked to international shipments containing wood packaging material.

In 2009, the Commission on Phytosanitary Measures of the International Plant Protection Convention adopted a standard prescribing uniform regulatory control of wood packaging material moving in international commerce. This standard titled: "*ISPM 15, Regulation of Wood Packaging Material in International Trade*" recognizes the inherent pest risks associated with the international movement of untreated wood packaging material. Although this standard does not obligate countries to establish regulatory controls, the guideline represents a mechanism by which any country may establish regulatory controls in a manner that is internationally harmonized. This Canadian import directive reflects the guidelines established in *ISPM 15* as updated in 2018.

In order to mitigate the entry of pests associated with non-compliant dunnage, the CFIA has established a new shipborne dunnage program providing specific requirements for the safe discharge and disposal of shipborne dunnage in all ports of Canada.

4 Scope

4.1 Regulated pests

Numerous pests regulated by Canada could be associated with wood packaging material, including shipborne dunnage. Insects are the most commonly detected pests, but fungi and bacteria can also be associated with imported material. The list of pests regulated by Canada can be found on the CFIA website.

4.2 Regulated articles

Wood packaging material constructed from the wood of any plant species not meeting the exemptions listed in section 4.2.1.

This includes, but is not limited to, dunnage, pallets, spacers, bearers, crating, and wood bracing not permanently attached to freight vehicles or containers (for example: flat rack and flatbed containers).

Note: WPM used for the transport of logs and lumber is also regulated by this policy.

4.2.1 Commodities that are exempt from phytosanitary import requirements

The following articles are considered to be a low risk and are exempt from the requirements of this directive:

- wood packaging material made entirely from thin wood of 6 mm or less in thickness.
- wood packaging material made entirely from processed wood such as plywood, particle board, oriented strand board, or veneer that has been created using glue, heat, pressure, or any combination thereof.
- wood shavings, sawdust, and wood wool used to stabilize a commodity.
- Gift boxes for wine, cigars and other commodities made from wood that has been processed and/or manufactured in a way that renders it free of pests.
- Barrels for wine and spirits that have been heated during manufacturing. **Note: Not all barrels are exempt.** The requirements for the importation of decorative wood barrels are provided in directive D-02-12.
- Wood components permanently attached to freight vehicles and containers.

4.3 Regulated Areas

All countries excluding the continental United States.

Note: Information on the implementation of ISPM No. 15 (2009) for wood packaging moving between Canada and the United States is maintained on the CFIA website.

5 Phytosanitary entry requirements

All wood packaging material (WPM) must be constructed with debarked wood and treated using one of the approved methods listed in Appendix 1. In addition, all WPM must bear a mark that meets the requirements as specified in Appendix 1 to be admissible into Canada.

A phytosanitary certificate is not required, but may be used in lieu of the marking system prescribed below. A Permit to Import is not required.

Note: By way of bilateral arrangement, a phytosanitary certificate is not accepted for the entry of wood packaging material originating from the People's Republic of China.

5.1.1 Wood packaging material certification system

The NPPO of the country from which the wood packaging material originates must have a certification system in place for the approval and monitoring of facilities producing wood packaging material to meet ISPM 15 (2009).

This certification system must ensure that the wood packaging material or wood used in the repair or remanufacture of wood packaging material is treated in accordance with one of the methods specified in Appendix 1.

Facilities must be approved by the NPPO to affix a mark to the treated wood packaging material. The system of marking must conform to the specifications laid out in Appendix 1.

Many countries have indicated that they have systems in place to meet Canada's import requirements. Information about the implementation of ISPM 15: 2009 in other countries can be found at: https://www.ippc.int/en/countries/all/ispm15/.

The requirements for treatment and marking of wood packaging material that is reused, repaired or remanufactured are described in Section 4.3 of ISPM 15: 2009. Please consult the IPPC Web site at https://www.ippc.int/en/core-activities/standards-setting/ispms/ for up to date information.

6 Specific phytosanitary entry requirements for shipborne dunnage

All shipborne dunnage must be officially treated by one of the methods specified in Appendix 1, including debarking. A mark, officially endorsed by the NPPO of the country from which the dunnage originates, must be permanently affixed to each unit of dunnage (as described in Appendix 1).

Shipborne dunnage discharged in Canada may only be done under the provisions of a Permit to Import and at designated terminals through the shipborne dunnage program, described below. A port terminal where shipborne dunnage is permitted to be discharged as per the shipborne dunnage program is called a "designated terminal" in this document.

6.1 Shipborne dunnage program

6.1.1 Notification requirements

Prior to the vessel entering Canadian waters, the Canadian agent is responsible for ensuring that the CFIA is notified of the vessel's intentions to discharge shipborne dunnage while in Canada. The Canadian agent is responsible for ensuring that, where a marine vessel intends to discharge dunnage in Canada, notification is made to the CFIA office (as listed in Appendix 3) closest to the discharge port **at least 96 hours prior** to the vessel's arrival in Canada.

At the time of notification, the Master of a marine vessel, intending to discharge shipborne dunnage in Canada, must provide the following information to the CFIA, either directly, via the vessel's Canadian agent, or the designated terminal:

- Destination port, including terminal where applicable, in Canada
- Estimated discharge date(s) of the dunnage
- Country of origin of the dunnage and cargo

Discharge of shipborne dunnage is only permitted in designated terminals that are registered under the shipborne dunnage program. A list of designated terminals that can accept shipborne dunnage can be consulted in Appendix 6.

Important note for non-compliant shipborne dunnage: The import of non-compliant dunnage into Canada is a violation of Section 7 of the *Plant Protection Act* (PPA). Vessels with non-compliant dunnage on board will be considered non-compliant during the entire stay in Canada and may be subject to additional enforcement action.

The CFIA has the authority to detain and order the discharge and disposal of non-compliant shipborne dunnage while in Canada.

6.1.2 Permit to Import and preventive control plan

A Permit to Import is required. Any individual or corporation willing to take care or control of dunnage to be discharged at any given Canadian port terminal can apply for a permit to import under the shipborne dunnage program.

Applicants[1] must apply for and receive a Permit to Import prior to shipborne dunnage being discharged at the corresponding port terminal(s). Details on the Permit to Import application process are available on the CFIA website at: https://inspection.canada.ca/about-cfia/my-cfia/eng/1482204298243/1482204318353.

The shipborne dunnage program process is initiated when an application for a Permit to Import is submitted to the CFIA.

As part of the Permit to Import issuance process, the applicant must develop a Preventive Control Plan (PCP) as described in Appendix 5 of this directive, and submit it to the CFIA for review and approval.

The Permit to Import will be issued once the CFIA has approved the PCP and the facility has passed an evaluation inspection by CFIA, as described in section 7.2.1.

The PCP is a written document that demonstrates the system-based approach developed by the applicant to ensure that risks associated with shipborne dunnage are mitigated. The PCP shall include processes for receiving, inspecting, segregating, storing, moving, and ultimately disposing or processing of shipborne dunnage.

The Permit to Import and the PCP must be reviewed and renewed each year. If the facility intends to make any significant changes to the processes, the PCP must be amended and submitted to the CFIA for review and approval prior to implementing the new procedures.

The specific import conditions will be outlined on the Permit to Import as per Appendix 4.

[1] Applicants can be a Canadian individual, or in the case of a corporation with a place of business in Canada, an agent or officer of the corporation who resides in Canada.

6.1.3 Discharge and monitoring

Visual monitoring and reporting

Shipborne dunnage must be monitored to identify materials that do not meet the entry requirements as described in section 5. This includes, but is not limited to, dunnage that:

- is missing the ISPM 15 mark (as per Appendix 1), unless a valid phytosanitary certificate was provided
- has bark above the threshold (as per Appendix 1)
- is found to have live pests or signs of live pests

The PCP must describe how the dunnage will be visually monitored by trained staff at the time of discharge. If non-compliant shipborne dunnage is found, the PCP must describe the process that will be followed to immediately notify the local CFIA office. The PCP must detail how the facility will segregate and identify the non-compliant dunnage. The non-compliant dunnage must be stored in a manner that will prevent escape of any pests, and allow for safe and efficient inspection by either the CFIA or the Canadian Border Services Agency (CBSA).

Non-compliant dunnage will be disposed of according to the designated terminal's PCP, or as otherwise specified by the CFIA inspector.

Live pests or signs of live pests detected

Where live pests or signs of live pests are found in association with shipborne dunnage, notification must be made immediately to the CFIA. The PCP must specify the control measures that will be taken to avoid the escape or movement of injurious pests from the dunnage already discharged and from any dunnage still remaining on the vessel. Infested articles may be ordered to be treated prior to movement or disposal.

6.1.4 High and low risk periods

The high risk period is from March 1 to September 30 for British Columbia ports, and from March 15 to September 30 for other ports of Canada. The rest of the year is considered as the low risk period. Storage (section 6.1.5), movement (section 6.1.6), and disposal requirements (section 6.1.7) are dependant on the time of the year and location of the designated terminal.

6.1.5 Storage requirements

General requirements

The PCP must describe how all discharged dunnage will be identified and segregated from any other wood material. Any wood material with unknown identity or that has been co-mingled with discharged dunnage is considered to be discharged dunnage and must be handled as such.

Non-compliant shipborne dunnage must be stored in a manner to allow assessment by a CFIA or CBSA inspector. Following assessment of the dunnage by the CFIA or CBSA, the dunnage may be handled according to the facility's PCP for compliant materials, unless otherwise specified by the inspector.

Additional requirements for high risk period

During the high risk period, all discharged dunnage must be stored in a manner to avoid any pest escape at all times, other than when actively discharging. The PCP must describe how dunnage will be secured during and after the discharge process.

Secured shipborne dunnage must be disposed, processed, or transported to a disposal or processing facility within 72 hours of completion of discharge. If the storage container is to be opened or accessed at any time at the designated terminal, the PCP must describe the mitigation measures that will be taken to prevent the escape of pests.

Additional requirements for low risk period

During the low risk period, high risk period storage requirements are not mandatory. All dunnage discharged during the low risk period must however be completely disposed of or processed prior to the end of the low risk period.

6.1.6 Movement requirements

General requirements

The movement of shipborne dunnage from the designated terminal is not permitted without prior written approval of the CFIA. The dunnage may only be transported following the issuance of a domestic movement certificate (or other document as determined by the CFIA) and under the conditions specified.

The PCP must describe how the dunnage will be transported and in a manner to prevent the escape of pests.

Traceability must be maintained at all times. Dunnage must be identified and its location known and recorded.

A designated terminal may include a third party contractor for the transport of dunnage in their PCP. The contractor will be subject to evaluation and inspection by the CFIA as part of the designated terminal PCP assessment. It is also possible for a third party contractor to be recognized as a "designated transport company" by submitting an application form as per Appendix 7 with all required information. Designated transport companies mentioned in the PCP of a designated terminal are not considered as part of the PCP and will be inspected separately.

Requirements for movement to a disposal or processing facility

The dunnage must be transported directly to the site where disposal or processing is going to occur.

During high risk period, shipborne dunnage must be transported in such a manner so as to avoid any pest escape during transport. During low risk period, shipborne dunnage must be covered during transport so as to prevent spillage during transport.

The PCP must describe how the transporter will prevent the escape of pests in the event of an accident or other extraordinary incident during the transport of the container from the designated terminal to the disposal or processing destination.

Requirements for movement to other countries

Dunnage as a commodity

Only dunnage that is marked and made of debarked wood according to ISPM 15 specifications, found to be free from live pests or signs of live pests, and not co-mingled with non-compliant dunnage, may be shipped to another country. It is the exporter's responsibility to ensure the dunnage would be admissible to the destination country.

The CFIA will not inspect or certify foreign origin dunnage for the purposes of re-export.

During the high risk period, shipborne dunnage being shipped as a commodity must be secured on the vessel in a manner to prevent the escape of pests until the vessel leaves Canadian waters. The PCP must describe how the designated facility will ensure that the dunnage is secured onboard the marine vessel while in Canadian waters.

During the low risk period, shipborne dunnage being shipped as a commodity does not need to be securely stored onboard provided the vessel leaves Canadian waters prior to the end of the low risk period. The PCP must describe how the designated facility will ensure that vessels with dunnage onboard will depart prior to the high risk period, or ensure appropriate steps to secure the dunnage are followed where necessary.

Dunnage reused as dunnage

Dunnage cannot be reused as dunnage during the high risk period. It is possible during the low risk period following the same requirements as for dunnage as a commodity.

Requirements for movement to another designated terminal

Shipborne dunnage may be moved to another designated terminal for further handling.

During the high risk period, shipborne dunnage to be transported must be identified and secured in a manner to prevent pest escape at all times. During the low risk period, shipborne dunnage must be covered so as to avoid any spillage during transport.

The shipborne dunnage must be visually monitored according to Section 6.1.3. before it is moved to the other designated terminal. This monitoring cannot be deferred to the next designated terminal.

The PCP of both designated terminals must describe how the dunnage will be stored at the destination terminal prior to disposal or processing (within 72 hours after completion of discharge).

6.1.7 Disposal or processing of shipborne dunnage

Discharged dunnage must be processed or disposed in a manner as described in Appendix 2.

Facilities that intend to dispose or process shipborne dunnage must be approved by the CFIA as a designated facility[2]. Designated terminals can also include the disposal or processing procedure in their own PCP.

The disposal or processing facility must be capable of disposal or processing shipborne dunnage in a manner that prevents the introduction and spread of pests into Canada.

[2] A list of designated facilities can be found in Appendix 6.

All shipborne dunnage must be identified and kept segregated from any other wood material at all times. Any wood material that is unidentified or has been co-mingled with shipborne dunnage must be disposed or processed in the same manner as the shipborne dunnage.

During the high risk period

Shipborne dunnage must be identified and stored in such a manner as to prevent any pest escape until the time it is disposed of or processed. The time limit for storage should not exceed two (2) days (48 hours) following receipt of the dunnage at the disposal or processing facility.

During the low risk period

Shipborne dunnage must be completely disposed of or processed before the end of the low risk period.

6.1.8 Records

The PCP must detail all receiving, visual monitoring, and shipping records, along with any other documents that directly pertain to the shipborne dunnage program. Records must be maintained by the designated facility for a period of two (2) years, and must be provided to a CFIA inspector upon request.

7 Inspection procedures

7.1 Wood packaging material, excluding shipborne dunnage

Inspection of WPM may be done at the point of entry by CBSA, or at other locations by CFIA inspection staff. This inspection can be done separately or in conjunction with the import of other regulated commodities.

The inspection will verify:

- that required marks are applied or appropriate certification has been provided,
- freedom from bark, presence of live pests or signs of live pests.

7.2 Shipborne dunnage inspection procedures

All shipborne dunnage is subject to inspection by CBSA or CFIA inspectors. The purpose of inspection is to verify:

- that shipborne dunnage is only discharged in terminals that are covered by valid import permits issued under the shipborne dunnage program.
- that required marks are applied or appropriate certification has been provided,
- freedom from bark, presence of live pests or signs of live pests.

7.2.1 Shipborne dunnage program

CFIA inspectors will evaluate the Preventive Control Plan (PCP) submitted by facilities applying to be a designated terminal, transporter or disposal/processing facility and will conduct an evaluation inspection to assess the proper application of the PCP.

CFIA inspectors will conduct surveillance inspections in designated terminals to assess adherence to the PCP during discharge of shipborne dunnage at least two (2) times per year, with at least one (1) being performed during high risk period. The inspection frequency may be increased if deemed necessary by the inspector. Designated transport companies and designated processing/disposal facilities are subject to the same inspection frequency. At least one (1) surveillance inspection needs to be scheduled at the beginning of the high risk period to assess the proper transition from the low risk period.

CFIA inspectors will perform an evaluation inspection once a year to assess the proper application of the Permit to Import and the PCP. Designated transport companies and designated processing/disposal facilities will be inspected following the same rule. This system audit must cover the whole system, but it is possible to rely on the surveillance inspections for some requirements if deemed appropriate.

When a designated terminal reports non-compliant dunnage, the dunnage will be subject to additional inspection by the CFIA or CBSA.

7.2.2 Direct inspection of dunnage

Shipborne dunnage is only permitted to be discharged in Canada as per the shipborne dunnage program. However, under exceptional circumstances, shipborne dunnage may be permitted to enter Canada without restrictions if it has been inspected by a CFIA or CBSA inspector and found compliant with section 5.

Dunnage must:

- be discharged in a designated terminal.
- be highly specialized or unique. Rationale for the exemption is required.
- be a small amount. Whole vessel loads cannot be inspected under this option.

The designated terminal (or other responsible party) must also:

- submit a request for inspection to the CFIA local office at least 72 hours (3 days) in advance.
- present the dunnage in a safe manner that allows a thorough and efficient inspection.
- ensure that the inspection is timed to occur immediately after discharge.
- ensure that the whole load can be inspected.

The CFIA may approve the request if all of the above conditions are met and operational capacity allows for the inspection. Other exceptional circumstances could be accepted on a case-by-case basis. Fees for inspection will be charged as per the Plant Protection Fees schedule.

8 Non-compliance

The CFIA will follow the guiding principles in its Compliance and Enforcement Policy when informing regulated parties, assessing and monitoring compliance, and responding to instances of non-compliance. Any costs incurred due to non-compliance or violation (disposition, removal, etc.) will be the responsibility of its owner, importer, or the person having possession, care, or control of it.

Notifications of non-compliance will be issued in accordance with D-01-06: Canadian Phytosanitary Policy for the Notification of Non-compliance and Emergency Action.

8.1 Wood packaging material, excluding shipborne dunnage

WPM that is missing the required marks, is not made of debarked wood, or found to have live pests or signs of live pests is considered to be non-compliant. Where CBSA finds the WPM non-compliant at the time of entry into Canada, the guidelines as specified in Sections 41-50 of Memorandum D19-1-1 will be followed. Where CFIA finds non-compliant WPM, the material may be ordered treated prior to disposal or removal from Canada.

8.2 Shipborne dunnage

8.2.1 Discharge of dunnage in Canada

Importing dunnage into Canada that does not comply with the phytosanitary requirements as listed in Appendix 1, or discharging dunnage in ports, terminals, or locations that are not designated under the shipborne dunnage program are considered to be violations of section 7 of the *Plant Protection Act*.

Violations of the *Plant Protection Act* are subject to compliance and enforcement controls, including monetary penalties. Dependant on the type of violation, the vessel, the Agent, or the designated terminal may be identified as the responsible party.

8.2.2 Shipborne dunnage program

For designated terminals, the Permit to Import may be cancelled if the terminal is found not to be in compliance with any one of the conditions set out in their Permit to Import or the *Plant Protection Act* and *Regulations*.

Designated terminals, transporters and disposal/processing facilities may be removed from the program if found not to be in compliance with any one of the conditions set out in the shipborne dunnage program or the *Plant Protection Act* and *Regulations*.

9 References

9.1 Fees

The CFIA charges fees in accordance with the *Canadian Food Inspection Agency Fees Notice*, which may also be collected by the CBSA. For information regarding fees associated with imported product,

please contact the Import Service Center (ISC). Anyone requiring other information regarding fees may contact their local CFIA office or visit the Fees Notice webpage.

9.2 Supporting documents

- IPPC secretariat. 2018. *Regulation of Wood Packaging Material in International Trade* (2009) with modifications to Annex 1 and 2 (2018). International Standard for Phytosanitary Measures No. 15. Rome. FAO on behalf of the Secretariat of the International Plant Protection Convention.
- IPPC Secretariat. 2021. Glossary of phytosanitary terms. International Standard for Phytosanitary Measures No. 5. Rome. FAO on behalf of the Secretariat of the International Plant Protection Convention.
- Canadian Food Inspection Agency. Plant health glossary of terms. Ottawa.
- Canadian Food Inspection Agency. 2017. *D-02-12, Phytosanitary Import requirements for non-processed wood and other wooden products, bamboo and bamboo products originating from all areas other than the continental United States*. Ottawa.
- Canadian Food Inspection Agency. 2015. *D-13-01: Canadian Heat Treated Wood Products Certification Program (HT Program)*. Ottawa.
- Canadian Border Service Agency. 2019. *Memorandum D19-1-1* (Food, plants, animal and related products). Ottawa.

Note: The requirements for the importation of forest products other than wood packaging material and dunnage (including lumber, decorative wood items, etc.) are provided in directive D-02-12.

Appendix 1: Wood Packaging Material requirements for entry into Canada

Use of debarked wood

Irrespective of the type of treatment applied, wood packaging material, including dunnage, must be made of debarked wood. For the purpose of this directive, any number of visually separate and clearly distinct small pieces of bark may remain on debarked wood if they are:

- less than 3 cm in width (regardless of the length); or
- greater than 3 cm in width, with the total surface area of an individual piece of bark less than 50 square cm.

Approved methods of treatment

Accepted treatments are those listed in annex 1 of IPSM 15. At time of publication of this directive, accepted treatments were as below. Please refer to annex 1 of ISPM 15 for details regarding these treatments.

- Heat Treatment using a conventional steam or kiln-dry heat chamber
- Heat treatment using a dielectric heating
- Fumigation using methyl bromide
- Fumigation using sulphuryl fluoride

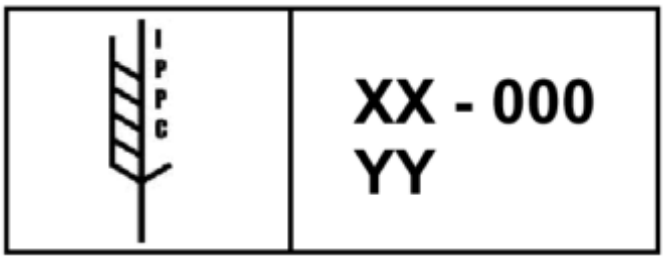
Treatments cannot be inspected directly, but can be assessed by verifying the mark or can be denied if live pests or signs of live pests are detected.

Marking of treated wood packaging material

Wood packaging material that has been treated by one of the methods specified above and in a manner that is officially endorsed by the NPPO of the country from which the wood packaging material originates may be permitted entry into Canada provided the wood packaging material is marked as per annex 2 of ISPM 15. Examples of acceptable marks are provided in figure 1.

1. The mark must at minimum include:

   The IPPC symbol for treated wood packaging material (as per Annex 2 of the *"International Standard for Phytosanitary Measures No. 15, (2009) Regulation of Wood Packaging Material in International Trade*") as reproduced here.



- The design of the symbol must be presented to the left of the other components.

- The country code (XX). The country code must be the International Organization for Standardization (ISO) two-letter country code for the country in which the wood packaging material is produced. It must be separated by a hyphen from the producer/treatment provider code.

- The producer/treatment provider code (000). The producer/treatment provider code is a unique code assigned by the NPPO to the producer of the wood packaging material or the treatment provider who applies the marks or the entity otherwise responsible to the NPPO for ensuring that appropriately treated wood is used and properly marked. The number and order of digits and/or letters are assigned by the NPPO.

- The treatment code (YY). The treatment code is an IPPC abbreviation for the approved measure used (for example HT for heat treatment or MB for methyl bromide fumigation). The treatment code must appear after the combined country and producer/treatment provider codes. It must appear on a separate line from the country code and producer/treatment provider code, or be separated by a hyphen if presented on the same line as the other codes.

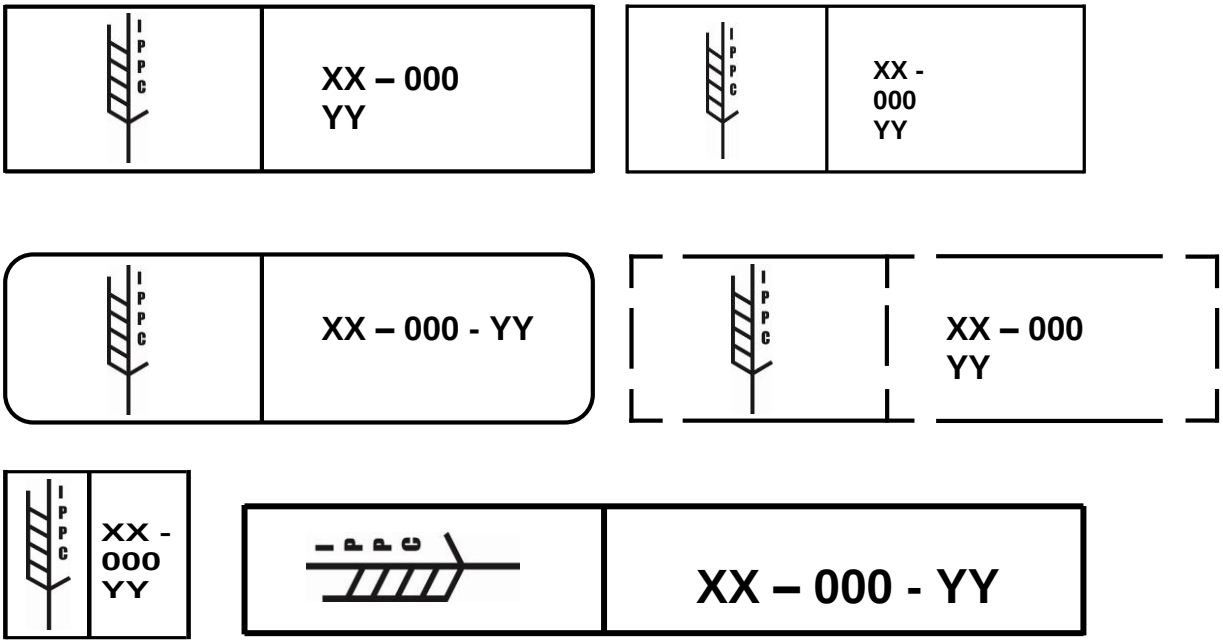
2. Other information (for example: control numbers) may also be included provided it is not confusing, misleading, or deceptive. Such information may be provided adjacent to but outside of the border of the mark.

3. The mark must be:

   - legible (illegible marks are considered non-compliant)
   - durable and not transferable (tags are not allowed)
   - rectangular or square in shape and contained within a border line with a vertical line separating the symbol from the code components
   - placed in a location that is visible when the wood packaging material is in use, preferably on at least two opposite sides of the wood packaging unit
   - the mark must not be hand drawn.

4. 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.

Figure 1. Examples of acceptable variants of the required components of the mark.



Appendix 2: Approved disposal methods for wood packaging material and shipborne dunnage

All wood packaging material (WPM) and discharged dunnage

The following methods may be used to dispose or process all WPM and discharged shipborne dunnage:

- incineration.
- burial to a depth of no less than two metres at a CFIA-approved landfill and must be covered immediately.
- Industrial processing using glue, heat, pressure and any combination thereof that render the end product a negligible risk, such as wood dust, plywood, particle board, oriented strand board or veneer.

Wood chipping is not an approved method of disposal due to the risk of pathogens, bacteria, or viruses that could be present. Chipping can be included as a step in the disposal or processing procedure, but must be treated or disposed as described above.

Other disposal methods may be accepted by CFIA on a case-by-case basis.

Inspected and compliant shipborne dunnage only

Under the authorization of the CFIA, shipborne dunnage that has been found compliant as per section 5 may be permitted to be completely remanufactured in a facility certified under D-13-01. The dunnage will be subject to heat treatment (using the approved treatment schedule for hardwood).

Segregation and identification is required at all times.

Appendix 3: CFIA Offices and Contact information

CFIA offices coordinates can be found on our webpage:

Contact a CFIA office by telephone - Canadian Food Inspection Agency (canada.ca)

Appendix 4: Conditions outlined in the Permit to Import issued for the shipborne dunnage program

Destinations

(Permits can combine more than one terminal of the same port, but cannot combine terminals from different ports.)

Selected conditions

SHIPBORNE DUNNAGE (ALL SPECIES)

- The phytosanitary certificate is not required.

Additional Conditions

SHIPBORNE DUNNAGE (ALL SPECIES)

- The import permit holder must have a Preventive Control Plan (PCP). The PCP must be approved by the CFIA and the PCP must be implemented prior to the discharge of shipborne dunnage.
- The import permit holder must meet all the requirements as outlined in the D-98-08 and must follow its CFIA-approved PCP at all times.
- The import permit holder must verify that all shipborne dunnage discharged at their facility is marked according to ISPM 15 requirements, made of debarked wood, and does not contain any live pests or signs of live pests.
- The import permit holder must report incidences of non-compliant shipborne dunnage to the CFIA immediately.
- The import permit holder must immediately implement their specified control measures as per its PCP if live pests or signs of live pests are detected.
- Shipborne dunnage must be processed or disposed of as per the PCP.

Appendix 5: Shipborne dunnage program: elements of a preventive control plan

Whether a designated terminal, a designated transport facility or a designated disposal/processing facility, each facility involved in the shipborne dunnage program must include the following elements in its PCP. Annex B of the Integrated Agency Inspection Model has been used to provide this guide and can be consulted for more details.

Element 1: Process Control

Import control

The PCP must describe the control measures used by the designated facility to verify that discharged dunnage meets ISPM 15 requirements and CFIA's import requirements

Product control

Designated terminals, transporters and disposal/processing facilities will describe how the dunnage will be processed to mitigate the risk of the spread of pests.

Element 2: Biosecurity control

Disposal or processing of shipborne dunnage

The PCP must indicate how the discharged shipborne dunnage will be disposed of or processed as per section 6.1.7. If procedures vary from high to low risk period, the PCP must explain the differences and how the transition is made.

Designated disposal or processing facilities must submit their own PCP describing all aspects of the disposal or processing procedure. All designated port terminals where shipborne dunnage is received from must be listed in the PCP. If procedures vary from one terminal of origin to another, the PCP must explain what are the differences and how these differences are operated.

Designated terminals that use a designated facility for the disposal or processing of shipborne dunnage may reference the PCP of the designated facility in the disposal section of their own PCP. How the facilities will communicate with each other must be described in both PCPs.

Element 3: Employee training

All employees who are involved in the shipborne dunnage program must be trained in the delivery of this program and the content of the PCP they must apply to fulfill their respective responsibilities.

The PCP must indicate:

- The training material that is provided to the employees.
- How the effectiveness of the training is monitored, verified, and maintained for all employees involved.
- Record of employees that have received training.

Element 4: Equipment design and maintenance

The PCP must detail the type of equipment used to store, move or dispose/process the dunnage. Equipment must be maintained so as to meet requirements outlined in the shipborne dunnage program.

Element 6: Receiving, transportation, and storage

Receipt, inspection and storage of shipborne dunnage

If applicable, the PCP must detail how the CFIA will be notified of incoming shipborne dunnage as per section 6.1.1. The PCP must indicate how shipborne dunnage will be discharged and visually monitored as per section 6.1.3, as well as where and how it will be stored and secured as per section 6.1.5. The use of plans are suggested. Traceability and segregation[3] procedures must be detailed. Where procedures vary from high to low risk period, the PCP must explain the differences and how the transition is managed.

Transport of shipborne dunnage

The PCP must cover the transport of dunnage from the loading of the stored dunnage on the transport vehicle to the unloading of the shipment at destination. The PCP must indicate how this will be done as per section 6.1.6 and must include a contingency plan to prevent the escape of pests in the event of an accident. If procedures vary from high to low risk period, the PCP must explain the differences and how the transition is operated.

Movement to other countries, to other certified terminals or to disposal/processing facilities must be detailed in separate sections.

Where not covered by a designated terminal, transport companies must submit their own PCP covering all aspects of the transport procedure. If a designated company is transporting shipborne dunnage for more than one port terminal, each terminal should be covered in a separate section. Terminals using a designated company for the transport of shipborne dunnage can refer to the PCP of the designated company in the transport section of their own PCP. How the facilities will communicate with each other must be described in both PCPs.

Element 7: Traceability and control

Traceability

The facility has to include how each occurrence of discharge of dunnage is traceable at each step of the process in the PCP.

Control

The PCP must describe how the facility will respond to a pest detection as per section 6.1.3.

[3] Segregation is only required if remanufacture of dunnage is planned (see section 6.1.7)

Verification procedures

The PCP must detail an internal verification procedure to ensure that the measures included in the PCP are followed. The PCP must identify a responsible person to conduct the verification and verification frequency.

The PCP must also describe what steps will be taken following a deviation from the PCP: correcting the situation, determining the cause, and preventing reoccurrence.

Records

Records are evidence that the facility has implemented the preventive controls and that they are effective to meet the phytosanitary requirements. The facility must make them available for review by the CFIA.

The facility will need to identify records and documents associated with each element, and retain them for a period of two years. Some examples may include:

- Records of discharged dunnage in port terminals.
- Records of shipborne dunnage visual monitoring.
- Transport/shipping records.
- Receiving records.
- Domestic movement certificates and Permit to Import.
- Verification of procedures.
- Deviations and corrective actions taken.
- Management review.

Amendment procedure for the PCP

The PCP should be reviewed on an ongoing basis by the facility staff to ensure that it properly details the procedures and processes in place, and that it effectively addresses the risk associated with shipborne dunnage. Minor changes to the PCP may be done at any time, major changes to the PCP that impact the integrity of the program must be submitted to the CFIA for review and approval prior to implementation.

The PCP must have an amendment record.

Appendix 6: Designated terminals and facilities under the shipborne dunnage program

Link to CFIA webpage (to be added) with lists of designated facilities : designated terminals and designated transport or disposal/processing facilities

Appendix 7: Application for the shipborne dunnage program

Name of the facility : _____

Address : _____

Contact person : _____ title: _____

Phone: _____ email: _____

I, _____, the owner/person in possession, care or control of the above named facility, apply to the shipborne dunnage program as detailed in D-98-08 to be recognized as a:

- ☐ designated terminal: location and identification of terminal(s) _____ _____
- ☐ designated transport company
- ☐ designated processing or disposal facility

By submitting and signing this application form, I hereby accept the facility to be added on any publically available lists of designated facilities, including CFIA's webpage.

_____ _____

Name of the contact person signature and date

(TO BE COMPLETED BY CFIA)

- ☐ The facility has submitted a preventive control plan (PCP) that has been approved by the CFIA.
- ☐ The facility has been inspected by the CFIA and is in good standing with the shipborne dunnage program.
- ☐ The facility can be considered as a designated facility as mentioned above and can be added to the corresponding official list.

_____ _____

Name of the CFIA regional program officer signature and date