



POSITION STATEMENT ON THE POSSIBLE EXTENSION OF ISPM 15 TO INTRA COMMUNITY MOVEMENTS OF WOOD PACKAGING MATERIAL

FEFPEB, the representative European Federation for the timber pallet and packaging industry (including manufacturers, repairers, traders and pallet pool organisations) would like to address the European Commission and the Standing Committee on Plant Health with the industry view on the possible extension of ISPM 15 to all intra-community movements of wood packaging.

FEFPEB noted the intention of the European Commission to discuss the possible extension of ISPM 15 with relevant stakeholders such as our industry.

Our forest resources need to be protected, this is a common interest and responsibility and the long term interest of the EU, its member states, National Plant Protection Organisations and the woodworking industries. The (further) spreading of the Pine Wood Nematode (PWN) in Portugal is of major concern for FEFPEB.

The situation has been taken seriously by Portugal and the EC as proven by the recent Commission Decisions 2008/684/EC and 2008/790/EC. We endorse these decisions and ratify our duty to ensure compliance within our industry.

The purpose of this paper is to develop a position and its arguments to indicate that the decision for extending ISPM 15 for intra-community flows of wood packaging should only be made after careful consideration of the following elements:

- Measures orientated to control the spread of PWN must take priority and concrete actions and controls must be put in this direction.
- Joined effort, between the industry and forestry authorities, should lead to harmonising and strengthening the organisation and control mechanisms of ISPM 15.
- Scientific evidence should be at the heart of the discussion and be conclusive enough to justify the economic and environmental adverse consequences of the extension of ISPM 15.
- While ISPM 15 does not make any distinction between new and used wood packaging, this distinction is of utmost relevance for the industry, as the majority of trade in Europe is achieved by utilising used or repaired wood packaging.



- There is at present lack of installed capacity to ensure Heat Treatment of all intra-community wood packaging flows.

In more detail, FEFPEB main arguments are elaborated beneath.

1. What caused the further dissemination of PWN in Portugal?

The International Seminar on Control Strategies for PWN in Portugal (7-9 October 2008) concluded that human activities are the key factor for outbreaks in new areas.

The European Commission observes in Decision 2008/684/EC that a survey plan for the entire Portuguese territory was not approved because of insufficient monitoring intensity.

It also became obvious that ISPM 15 was not implemented to the required standard in terms of organisation and control of the national wood marking scheme.

With reference to the FEFPEB position statement (June 2006) in connection to the current revision procedure of ISPM 15, FEFPEB stresses that harmonisation of the existing national wood marking schemes is of critical importance to establish an effective and controllable ISPM 15 worldwide.

Before the extension of ISPM 15 to all intra-EU flows of wood packaging is considered, and acknowledging the heterogeneity of its current applications across Member States, we propose to develop an audit among all EU Member States on the implementation of ISPM 15 in terms of system organisation, control measures, governmental responsibilities and commitment and industry participation. This audit will allow to establish the most efficient schemes existing within the EU which could then be used as benchmarks for other Member States.

We are most willing to assist in such a project.

2. Scientific evidence

It is the clear responsibility of the plant health experts and scientists to provide robust scientific evidence so that all relevant stakeholders can decide on the extension of ISPM 15 as an appropriate measure to avoid and control the spreading of pests by wood packaging.



Considering the effects on the industry and society overall, it is imperative that the available scientific evidence be at the heart of the discussion on a possible extension of ISPM 15 to all intra-EU trade flows of wood packaging materials.

FEFPEB is willing to support and participate in research initiatives, aimed at obtaining scientific evidence that could support a well-informed and well-balanced decision about the extension of ISPM 15.

3. The principle of proportionality

Notwithstanding the overriding need for protection of our forest resources, the extension of ISPM 15 cannot be an isolated measure. Decision 2008/684/EC shows a broader scope of the EC as susceptible wood, bark and plants are regulated.

The extension of ISPM 15 cannot be implemented without significant economic and environmental implications: Need for big investments in heat treatment capacity, potential disruptions in the supply chain, increased energy usage and CO₂ emissions.

In this respect it is relevant to highlight that the timber pallet and packaging industry provides a very important outlet for the European sawmilling industry (22% of fresh sawn timber is allocated for the production of timber packaging).

Our industry is one of the few industries located in rural areas and has a vital socio-economic function for forestry areas as well.

This is to underline the importance of well-balanced decision making.

4. Extension ISPM 15: Other elements for consideration

a. Heat treatment capacity

Extension of ISPM 15 to intra-community movements will lead to heat treatment of virtually all wood packaging material.

Since the installed heat treatment capacity is insufficient to support the demands of an extension of ISPM 15, the wood packaging industry and the supplying machinery sectors as well need time to adapt to such a new situation.

Our estimation is that it will take several years to materialize such an adaptation.

b. Limitation to newly manufactured wood packaging material

As explicitly acknowledged in Decision 2008/790/EC, distinction should be made between used and new wood packaging material as the phytosanitary risk of old packaging material is small.



c. Distinction between the types of wood packaging

The wood packaging industry is represented by Pallets (75%), Industrial Packaging (20%), Crates (5%) (by volume) and Dunnage.

Once more, scientific evidence needs to help assess the risk profile of different packaging types. Thus, policy makers will be able to devise appropriate restrictive measures in proportion to the risk associated to each wood packaging type.

Conclusion

FEFPEB is most willing to discuss this Position Statement with the European Commission and the EC Standing Committee on Plant Health.

FEFPEB believes that the industry view is of the utmost importance in this decision making process.

Paris, 17 November 2008

FEFPEB

PO Box 90154

5000 LG TILBURG

The Netherlands

Tel: 0031 13 594 48 02

Fax: 0031 13 594 47 49

e-mail: fefpeb@wispa.nl

www.fefpeb.eu