



EU Legislation: Wood Packaging Materials used for Transport (Including Dunnage)

The EU sets requirements for (products wrapped with or supported by) wood packaging material (WPM). The most important requirements relate to approved methods of wood treatment and marking. All EU requirements for WPM are based on the international ISPM 15 standard.



Product	Why	Treatment	Marking
Wood or wood products that is/are used in supporting, protecting or carrying products. (CN codes in Annex V, Part B)	To prevent the introduction and spread of pests in the EU.	WPM must undergo: <ul style="list-style-type: none"> Heat Treatment (HT). Fumigation with Methyl Bromide (MB). 	All WPM entering the EU must contain a mark that indicates that the WPM has been treated conform the approved methods.

If you export products (any product) that are wrapped with or supported by wood packaging material (WPM) during transport, you have to make sure that your WPM complies with the following sets of requirements:

1. Requirements that apply to all plants and plant products brought into the EU (e.g. certain pests or plants are restricted to enter the EU).
2. Requirements that specifically apply to WPM (including dunnage) (e.g. wood treatment and wood marking).

Both sets intend to prevent the introduction and spread of pests in the EU, but this document only discusses the requirements **specifically related to WPM**. *Please note* that in order to ensure the EU entry of your products, you also have to check if your WPM complies with the requirements applicable to all plants and plant products.

Dunnage

Wood used to wedge or support non-wood commodities but does not remain associated with the commodity (e.g. loose material used to fill spaces in a trailer to prevent items from shifting during shipment).

At the end of this document, you will find a "[Question and Answers](#)" section which can help you to understand and comply with the EU requirements on wood packaging materials.

EU Legislation



[Directive 2000/29/EC](#) lays down the requirements for wood packaging material, which includes wood dunnage.¹

¹ Directive 2000/29/EC also lays down the requirements for all plants and plant products brought on the EU market.

The EU requirements for WPM (including dunnage) relate to:

1. Debarking;
2. Treatment;
3. Marking.

ISPM 15

Directive 2000/29/EC establishes that WPM entering the EU must be treated and marked according to ISPM 15 (International Standard for Phytosanitary Measures No. 15 on *Guidelines for regulating wood packaging material in international trade*). This standard is established by the International Plant Protection Convention (IPPC). More information on the treatment and marking requirements will be provided in the sections hereinafter. Click [here](#) for access to the standard and the IPPC website.

1. Debarking

WPM must be free from bark with the exception of any number of individual pieces of bark if they are either less than 3 cm in width (regardless of the length) or, if greater than 3 cm in width, of not more than 50 cm² in area.

2. Treatment

WPM entering the EU must have been treated with one of the following approved methods:

- **Heat Treatment (HT)** that achieves a minimum wood core temperature of 56°C for a minimum of 30 minutes. Kiln-drying (KD), chemical pressure impregnation (CPI), or other treatments may be considered HT treatments as long as they meet the HT specifications.
- **Fumigation with Methyl Bromide (MB)** in alignment with ISPM No. 15 requirements. In any case, minimum temperature should not be less than 10°C and the minimum exposure time should be 24 hours.

Both treatments are further specified in Annex 1 of [ISPM 15](#).

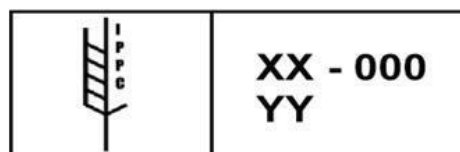
Methyl Bromide (MB)

Methyl bromide is known to deplete the ozone layer. Although there are international agreements that aim to phase out the use of MB, there are not always alternative treatments or other appropriate treatments available for certain situations or countries. However, where possible, you are expected to use the alternative treatments mentioned in the IPPC recommendation '*Replacement or reduction of the use of methyl bromide as a phytosanitary measure (2008)*'. Click [here](#) for access to the alternative treatments mentioned in the recommendation. Examples of alternative treatments are:

- Use other chemicals (e.g. sulfur dioxide or methyl iodide);
- Apply physical treatments (e.g. heating, cooling or irradiation);
- Immediately process the commodities (e.g. grain being milled into flour on arrival);
- Change your production methods (e.g. soil-free growing media, tissue culture or sterile culture);
- Improve your treatment facilities in order to increase exposure time with a reduction of dosage;
- Use higher temperatures when you fumigate your WPM.

3. Marking

All WPM entering the EU must contain a mark that indicates that the WPM has been treated conform the approved methods written above. The mark consists of the following components:



- **The ISPM 15 symbol:** Must be presented on the left of the other components. A few variations are allowed, however they must resemble the examples illustrated in Annex 2 of the standard.

- **A country code:** Must be the ISO two-letter country code (shown in the example as 'XX'). Click [here](#) for access to ISO's country codes.
- **A producer/treatment provider code:** An unique number assigned by the National Plant Protection Organisation (NPPO) to the producer of the wood or the treatment provider that is responsible for ensuring compliance with the standard (shown in the example as '000').
- **Treatment code:** the IPPC abbreviation for the treatment used (HT or MB) (shown in the example as 'YY').

The mark must be visible, legible and durable. The standard further prescribes in detail the layout of the mark. *Please note* that no variations in the symbol are accepted.

Processed wood as a WPM component

Processed wood and wood less than 6 mm in any dimension is, generally, exempt from control. This means that where WPM includes components made from processed wood, the processed wood components do not need to be subject to any additional treatment. Thus the mark on a crate made from both processed and non-manufactured wood components, which have been debarked and heat treated, may include the letters 'HT'.

Questions & Answers

- *How to acquire the ISPM 15 symbol?*

The ISPM 15 symbol (mark) must be acquired with the National Plant Protection Organisation (NPPO) of the country of origin. Therefore, it is your WPM supplier who has to arrange the mark. You, as an exporter using WPM, has to pay attention that all the WPM you ship to the EU is properly marked and make sure you demand the same from your suppliers.

The NPPO is the authority that is responsible for the phytosanitary regime in a country, which includes the requirements of the ISPM 15 standard. You can contact your NPPO for further information on marking procedures or any other questions relating to the standard. The contact details of each NPPO can be obtained through the IPPC Contact Points portal. Click [here](#) for access to the portal.

- *What happens if your WPM is not marked?*

The ISPM 15 mark proves to EU authorities that the WPM is treated according to the requirements laid down in the ISPM standard. Non-compliant WPM may be re-exported (with or without the products being shipped with it), destroyed, treated, subjected to deep burial or processing, e.g. chipping (depending upon the policy of the country of import), generally at the EU importer's expense.

EU authorities take samples of WPM entering EU borders. As a consequence not all WPM entering the EU will be controlled. However, if it appears that forbidden pests are present even though the WPM is marked, the WPM will be destroyed and your NPPO will be contacted for any further actions (if appropriate).

- *Do you need a phytosanitary certificate if you export WPM?*

According to the requirements applicable to all plants and plant products brought on the EU market, it is a requirement for certain listed plant products to be accompanied with a phytosanitary certificate (a certificate that states your products are in compliance with EU plant health legislation) upon entry in the EU.

However, regarding wood used as WPM, the ISPM 15 mark is considered sufficient proof of compliance with EU health legislation. As a result, you do not have to acquire a phytosanitary certificate.

Supply chain management

Please note that your company is also part of a supply chain and therefore your EU buyer might set requirements related to his supply chain management. You might have to pass on some requirements to your supplier as well, in order to fulfil the requirements of the EU markets.

Related documents

Please find below an overview of other legislative and non-legislative requirements that are of relevance when using WPM to transport products to the EU. Some of the requirements are shortly highlighted in this document. More details however, can be found in the CBI database under the following document titles:

Legislation:

- EU legislation: Organisms harmful to plants and plant products (plant health)
- EU legislation: Packaging and packaging waste
- EU legislation: Phytosanitary certificate and related issues (case)

Non-legislation:

- EU buyer's requirements: Supply chain management

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