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Background

1. What are the international requirements for the movement of wood packaging materials? When did this take effect?

In March 2002, the International Plant Protection Convention's (IPPC's) Fourth Interim Commission on Phytosanitary Measures (ICPM 4) adopted new guidelines for the uniform regulatory control of wood packaging moving in international trade: International Standards for Phytosanitary Measures (ISPM) 15: Regulation of wood packaging material in International Trade. ISPM 15 (2021) describes current guidelines for harmonized phytosanitary measures applicable to wood packaging material.

Application for participation in the HT Program

2. Where can I get a copy of the application form for registration for the HT Program?

Contact a CFIA approved [Alternative Service Provider](#) to obtain the registration form and/or for more information on how to register in the HT Program.

3. How do I know which of the “registration particulars” to select on the application form?

All registering facilities should consult with an Alternative Service Provider prior to developing their phytosanitary management system.

4. Who should register in the HT Program?

Facilities should register in the HT program if they wish to produce wood products (e.g., lumber, wood shavings) that are required to be heat treated to a minimum temperature of 56°C throughout the profile of the wood (including the core) for a minimum of 30 minutes for both export and domestic purposes.

Facilities wishing to produce wood packaging material that meets the ISPM 15 standard (whether they heat treat the packaging, produce new packaging or repair/remanufacture wood packaging material) should register in the HT program.

Facilities involved in the international trade of HT products.

Fees

5. What fees are applicable under the HT Program?

Refer to D-13-01 for information about CFIA Fees.

Alternative service providers will be collecting CFIA Program fees on behalf of the CFIA.

Alternative service providers also charge fees for registration and audit services provided under this program.

Wood packaging material regulated under ISPM 15

6. Do the ISPM 15 wood packaging requirements apply to all species of wood?

These guidelines apply to all species of softwood and hardwood products.

7. What are the requirements for wood packaging moving across the Canada-U.S. border?

Canadian origin wood packaging crossing the U.S. border is currently exempt from ISPM 15.

Currently, the U.S. accepts Canadian shipments with mixed wood packaging (i.e., foreign and Canadian origin wood packaging) provided that a statement: "All of the unmarked wood packaging material in this shipment is of Canadian origin" is included on shipment documentation. If the unmarked wood packaging is of U.S. origin, the statement should read: "All of the unmarked wood packaging material in this shipment is of U.S. origin." If the unmarked wood packaging is both Canadian and U.S. origin, the statement should read: "All of the unmarked wood packaging material in this shipment is of Canadian and U.S. origin." Foreign origin wood packaging that has been repaired or remanufactured in Canada must be compliant with the requirements of the HT Program.

Wood packaging material exempt under ISPM 15

8. What is processed wood?

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.

9. What type of packaging materials is exempt from ISPM 15 wood packaging import requirements?

The following articles are of sufficiently low risk to be exempted from the provisions of ISPM 15:

- 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
- 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
- sawdust, wood shavings and wood wool
- wood components permanently attached to freight vehicles and containers.

Production and Traceability under the HT Program

10. Can U.S. lumber be used within the HT Program for production of secondary manufactured wood or ISPM 15 wood packaging material?

Yes, Lumber obtained from the United States to be used by a facility registered under the HT Program must be heat treated at a facility that is monitored by the American Lumber Standards Committee (ALSC). All wood must be marked in accordance with ALSC requirements or accompanied by documents attesting to heat treatment issued in accordance with ALSC requirements. The Canadian registered HT facility must outline the origin of wood in their quality manual regardless of whether it is from Canada or the U.S. In the case of a facility registered under the HT Program receiving untreated wood of a species not grown in Canada (e.g. Southern Yellow Pine (SYP)), development of a specific option to heat treat such species may be required.

11. Can a facility registered under the HT Program supply U.S. wood packaging facilities with Canadian sawn HT wood or secondary manufactured HT wood?

Yes, all Canadian lumber, either in bundles or custom cut (pre-cut) units for assembly into wood packaging can be exported to the U.S. if it meets the requirements of the wood packaging enforcement regulations of the American Lumber Standard Committee.

According to the American Lumber Standard Committee program, all Canadian lumber used by an American wood packaging facility must be marked HT or KD-HT under the supervision of a Canadian Grading Agency accredited by the Canadian Lumber Standards Accreditation Board and the American Lumber Standards Committee.

Heat treatment certificates

12. Under what conditions are Heat Treatment (HT) Certificates required?

Refer to Appendix 5 of D-13-01 – HT Program.

13. When do Brokers need to be registered in the HT Program?

Brokers must be registered in the program when they consolidate treated lots, sell treated material on behalf of registered facilities and/or take title of treated material.

14. Can I revise a Heat Treatment Certificate once I have issued one to a non-registered exporter?

No.

15. Can the boxes on the Heat Treatment certificates designated "For optional use of exporter" be filled in after the certificate has been signed by an authorized representative of the registered facility?

No, heat treatment certificates shall not be altered after issuance.

16. Can a registered facility provide a blank certificate to an exporter, so that they may fill out the export details?

No, heat treatment certificates can only be issued by registered facilities. Providing blank certificates to an exporter is not permitted.

17. Do(es) the facility number(s) recorded on the heat treatment certificate need to match the facility number(s) on the sawn wood?

Not necessarily. For example, an export shipment may consist of multiple sources of wood. The certificate may identify the registered facility consolidating the shipment. The producing facility number(s) may be added to the description box to avoid issues at the port of entry.

18. What information needs to appear in the "Description of Consignment" box? (i.e. volume, # of packages, # of pieces, botanical name, common name, dimensions etc.)?

Refer to the instructions on the back of the HT Certificate.

19. Can unmarked wood packaging associated with the shipment be included on the Heat Treatment Certificate?

This depends on the importing country's requirements regarding wood packaging and dunnage. Some importing countries do not regulate dunnage accompanying wood if the accompanying dunnage is of the same type as the wood in the consignment. However other countries may require the accompanying dunnage to be ISPM 15 compliant.

20. For importing countries requiring a phytosanitary certificate, can a heat treatment certificate be sent in addition to the phytosanitary certificate?

It is recommended that only the required phytosanitary document accompany the consignment to avoid setting precedent or causing unnecessary confusion at the port of entry.

21. Can a phytosanitary certificate be issued for wood packaging material?

No, if a country is signatory to the IPPC and has adopted the ISPM 15 standard, the CFIA will not issue a phytosanitary certificate. Consult your local CFIA office for additional information on certification requirements.

22. Is it still necessary to get a phytosanitary certificate to export if a facility is registered under the HT Program?

Phytosanitary certificates are only issued when the importing country requests documentation from the National Plant Protection Organization to certify that the commodity meets their import requirements. Canada has developed bilateral arrangements with some countries which allows for heat treatment certificates to accompany the export in lieu of a phytosanitary certificate. However, even if your facility is registered on the HT Program you may still require a phytosanitary certificate to export to certain markets. Exporters are advised to contact their local CFIA office for import requirements to a specific country.

23. If I am registered in the HT Program, do I still need to get an inspection from the CFIA to get a phytosanitary certificate?

Although the CFIA retains authority to inspect, an inspection is generally not required if both the producing facility and the exporter are registered and in good standing under the HT Program and the only requirement is the verification of heat treatment. If there are other requirements an inspection may be required.

24. Who is eligible to issue a Certificate of Heat Treated – Dried Wood for Mexico?

Facilities registered in the HT Program producing heat treated and kiln dried wood may issue a certificate for shipments of wood to Mexico.

Wood packaging

25. How should the ISPM 15 mark be applied to wood packaging material that is made up of both processed wood products and non-processed heat-treated wood products (i.e. a plywood box with 2x4 frame)?

Where various components are integrated into a unit of wood packaging material, the resultant composite unit should be considered as a single unit for marking purposes. On a composite unit of wood packaging material made of both treated wood and processed material (where the processed component does not require treatment), it may be appropriate for the mark to appear on the

processed wood material components to ensure that the mark is in a visible location and is of a sufficient size. The mark should appear on a minimum of two opposite sides of the unit. This approach to the application of the mark applies only to composite single units, not to temporary assemblies of wood packaging material.

26. Where can ISPM 15 compliant wood packaging be sourced from?

Contact an [alternative service provider](#) for information on registered HT facilities producing ISPM 15 compliant wood packaging.

27. Can exporters that are not registered in the HT Program receive partially assembled, wood packaging from a registered facility and then complete the assembly at the non-registered facility once the commodity is ready for export?

Refer to appendix 5 of D-13-01.

28. Can the ISPM 15 certification mark for wood packaging be applied to the unit at a location other than the registered facility?

A facility registered under the HT Program may manufacture, assemble and mark wood packaging at a site that is not registered if it is impossible to assemble the unit at the registered facility. The registered facility must ensure all of the following conditions are adhered to:

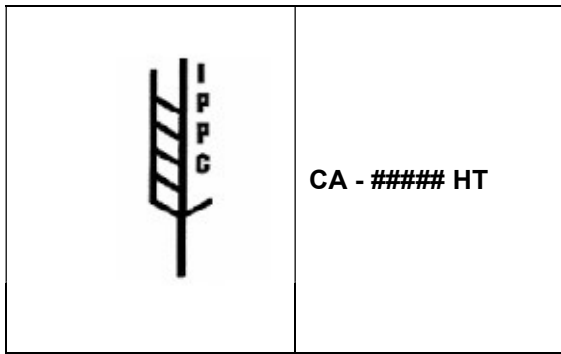
- The registered facility specifies in its quality plan the procedures used to ensure that wood packaging units assembled off site are compliant with ISPM 15 and D-13-01;
- The assembling and marking procedures used by the registered facility must be defined in their quality manual and approved by the alternative service provider;
- The assembly and marking of the wood packaging must be performed by a trained and authorized employee of the registered facility;
- The registered facility keeps records for a minimum of two (2) years of all wood packaging assembled off site. The records should include at least the client name, the number of units sold, and the fabrication date;
- The wood packaging is assembled and marked in Canada

29. Is registration in the HT Program required in order to repair wood packaging with non-regulated articles (e.g. plywood, OSB, veneer, plastic, metal) only?

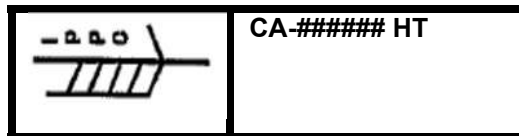
Those repairing wood packaging for export with only processed wood products (e.g. plywood, OSB, veneer, plastic, metal) need not be registered. However, the mark on the wood packaging must remain clearly legible and in accordance with ISPM 15. All other repair or remanufacturing of wood packaging must be conducted in accordance with HT Program.

30. Is it necessary when marking wood packaging with the ISPM 15 mark to also include the alternative service provider's logo or registration number?

Logos and registration numbers (other than the CA-##### registration number) must not appear inside the borders of the ISPM 15 mark but can be placed just outside the mark.



DUN



DUN



31. What is dunnage and what can it be used for?

Dunnage is defined by ISPM 15 as wood packaging material used to secure or support a commodity, but which does not remain associated with the commodity.

Dunnage may be used to block and brace goods after they are placed in a container. Wood used to block or brace goods can be nailed to ensure it remains affixed but is not attached with the purpose of moving with the goods once the container has been unloaded.

Dunnage is not intended for use in the construction of wood packaging such as pallets, crating or boxes which support, protect and allow a commodity to be carried. Alternative service providers (ASPs) shall inform facilities under their oversight of the requirements for the use of dunnage. When improper use of dunnage is encountered, the ASP under whose inspection program the dunnage was produced will take corrective action with the producer and will notify the customer. If improper use is not corrected, the ASP under whose supervision the dunnage was produced shall at a minimum notify the producer and the customer or owner of their responsibilities should any damages and liability arise from the improper use of dunnage.

If the ASP identifies a registered facility under the oversight of another ASP that is supplying dunnage which is being improperly used, then the CFIA should be notified. The CFIA will request follow-up at the registered facility by the responsible ASP.

32. What is the proper way of marking heat treated dunnage (i.e. single units of wood used in bracing or supporting a cargo)?

The mark must be placed in a location that is visible when the wood packaging is in use, preferably on at least two opposite sides. Some dunnage may be cut to final length just prior to its final use; therefore, special consideration must be made to ensure that all units bear the mark appropriately.

33. Should dunnage be marked differently from other wood packaging?

The ISPM 15 mark must be applied to all types of wood packaging including dunnage. Dunnage or other single pieces of wood used in bracing or supporting a commodity should include the additional mark: "DUN" which must be placed outside the ISPM mark borders (see example at question 33). Registered facilities should contact their alternative service provider to obtain additional information on requirements.

34. Are deviations of ISPM 15 mark permitted?

Marks must conform to the examples provided in Appendix 2 of Plant Health Directive D-13-01. Registered facilities must depict in their quality manual a sample of each mark used at their facility.

35. What size mark is required to be placed on a certified pallet?

There is no size specification for the application of the mark to certified wood packaging. However, the stamp must be legible, visible, placed on a minimum of two sides of the packaging unit and should be in colors other than red or orange.

36. What is the problem with illegible marking on wood packaging?

Failure to properly and legibly mark wood packaging could result in complications when examined by import control officials upon entry into an importing country.

All wood packaging material must be properly and legibly marked. If any item inspected by CFIA or an ASP determines that 10% or more of the pieces inspected are deemed to be illegible or incomplete the item shall be held for re-marking. An item in the context of WPM and dunnage refers to materials that have been marked by the facility for use in the assembly of WPM or as dunnage. An item shall be defined as approximately 200 pieces or more of dunnage or 200 units or more of WPM.

37. Who enforces the international wood packaging import requirements?

Once the wood packaging arrives in a country which has implemented the ISPM 15 standard, the National Plant Protection Organization or its Customs authority may inspect the wood packaging materials to ensure the import requirements are met. Some countries verify import requirements based solely upon the shipping documentation. Exporters may wish to include a statement on the shipping documentation which indicates that the wood packaging contained in the consignment complies with ISPM 15 to facilitate the entry of the consignment. However, it is the IPPC mark that serves as the basis of certification for wood packaging material. The Canadian Border Services Agency (CBSA) performs inspections for wood packaging arriving in Canada.

38. Does Canada have wood packaging import requirements?

Import requirements are described in policy D-98-08: Entry Requirements for Wood Packaging Materials Produced in All Areas Other Than the Continental United States. This policy includes the requirements for dunnage.

Segregation of HT wood

39. What does “segregation” mean under the HT Program?

Segregation is the separation of treated from untreated wood or wood packaging to ensure that mixes of compliant and non-compliant product do not occur. Untreated wood may be physically separated from treated wood, or other methods such as clearly marking treated *versus* untreated wood or clear signage; etc. may be used.

40. What should a facility do if a live pest is encountered in raw materials, or finished assembled wood packaging material?

If a live pest is found in treated material, isolate and secure the material by wrapping or placing in a closed container to prevent pest escape. Place the pest in a separate closed container for identification. The facility must contact their ASP immediately.

HT Facility Quality Manuals

41. Who can assist in developing a facility quality manual?

Alternative service providers are available to help with the development of quality manuals for facilities wishing to become registered under the HT Program.

Auditing of the HT Program

42. Who audits the facilities in the HT Program?

All facility audits are performed by approved alternative service providers. CFIA may also conduct facility audits.

43. What is a non-conformance?

Refer to Section 4 of D-13-01.

44. What is a non-compliance?

Non-compliance is a violation of Canadian or foreign legislation or regulation (e.g. the export of a non-compliant product is a non-compliance).

45. What are the consequences for exported Canadian wood packaging that does not comply with a foreign country's wood packaging import requirements?

If Canadian wood packaging does not comply with the import requirements of the country of destination, the following may occur:

- The consignment is refused entry into the importing country and may be required to be removed from the country; or
- Non-conforming wood packaging may be separated from the commodity and destroyed; or
- Non-conforming consignments may be treated or destroyed; or
- The consignment may be detained until other actions are taken.

Failure to meet the phytosanitary import requirements of a foreign importing country is also a violation of the *Plant Protection Act* and *Plant Protection Regulations* and may lead to enforcement actions by the CFIA under the *Agriculture and Agri-Food Administrative Monetary Penalties Act*.

46. What does suspension from the HT Program mean?

Suspension means that a facility cannot certify any wood products as heat treated or apply the ISPM 15 mark to wood packaging. Suspension may result from a major non-conformance that has not been corrected in sufficient time. A registered facility may also face immediate suspension for inability to meet HT Program requirements. A facility will only be reinstated once it completes all corrective actions, and they have been verified as complete.

47. What does cancellation from the HT Program mean?

A facility's registration from the HT Program may be cancelled if it fails to pay the CFIA annual registration fees, fails to pay program audit service fees or is found to be unable to maintain conformance with HT Program requirements.

48. What happens to the CA-number when a facility withdraws for any reason from the HT Program?

Certification numbers are not re-used. If a facility voluntarily withdraws from the HT Program, the facility may reapply for participation and request the CA number previously prescribed to the facility. If a facility's registration in the HT Program is cancelled, the facility may reapply for registration once corrective actions have been undertaken. The facility will receive a new registration number once it is approved for participation.

Inactivity in the HT Program

49. If an HT facility ceases operations for a period throughout the year (i.e. seasonal operations), are audits still needed during the seasonal shut down?

Audits are not required during periods of inactivity provided all stamps and certificates are surrendered or placed under care and control of the Alternative Service Provider. All certification activities must cease including marking of wood packaging, certification of heat-treated lumber or the issuance of heat treatment certificates. An evaluation audit will be performed at the time the facility restarts operation if the facility is inactive for a period of six (6) months or more.

Registration under the HT Program

50. When a Heat treatment facility and the actual shipper are under the same ownership, but in two separate locations, are they required to obtain two separate registration numbers or can they operate as one entity under a single registration?

Two facilities with distinct production processes intended to facilitate a single output may operate as a single entity, provided the facilities are in close proximity to one another; the quality manual accounts for activities at both operations and that all phytosanitary procedures at both facilities comply with the requirements of the program. A company with multiple production sites located in various locations cannot operate as a single facility.

51. May a single location with 2 separate facilities / businesses (2 separate legal entities) operating in the same space/physical address coexist with out the need for each facility to be certified?

Yes, two separate facilities / businesses may operate at the same location / physical address without the need for each facility to be certified provided there is an identifiable separation between the two facilities and the registered facility has documented procedures in their quality manual on maintaining segregation from the non-registered facility.

52. Do secondary lumber processors need to be registered in the HT Program in order to supply or do custom processing of HT material intended for use in certified wood packaging material?

Yes - where HT certified materials are processed into components or are resized for use in the production of certified wood packaging material the facility doing the processing must be registered participants in the HT program.

53. What is the process of registration under the HT Program?

