

# The UK Wood Packaging Material Marking Programme

Requirements for regulating wood packaging material in international trade ISPM15

## Addendum – Exempt Mark Programme

November 2018 Revision 4.0



## Contents

- 1.0 Addendum – Exempt mark programme
- 2.0 Pallet pooling definitions
- 3.0 Identifying mark definitions
- 4.0 Pool pallet manufacture
- 5.0 Repair process
- 6.0 Pool pallets currently in circulation
- 7.0 Reclaimed timber components
- 8.0 Removal / obliteration of marks

## Appendices

### Appendix 1

UKWPMMP Exempt Closed Pools – Processing ISPM15 Marked Pallets with new ISPM 15 treated timber stock.

### Appendix 2

Imported Pallets Processed By UK Closed Pallet Pool - Processing ISPM15 Marked Pallets with new ISPM 15 treated timber stock.

### Appendix 3

UKWPMMP Exempt Closed Pools – Repair with Reclaimed Components

### Appendix 4

UKWPMMP Licenced EPAL Open Pool Repairer



## 1.0 Addendum – Exempt Mark Programme

The Forestry Commission (FC) accepts pooled pallets may be exempt from the removal of all existing marks and total re – treatment of pallets after repair, subject to verifiable compliance of the terms and conditions set down in the Addendum – Exempt Mark Programme, of the UK Wood Packaging Material Marking Programme (UKWPMMP) revised edition 2017 and subsequent revisions as applicable.

## 2.0 Pallet Pooling Definitions

Pallet pooling is the shared use of high quality standardised reusable pallets to enable efficient logistics.

There are 2 types of pallet pool loops i.e. Closed or Open. In Closed Loop Pools, the ownership of the pallet remains with the pool operator whereas with Open Loop Pools pallets of equivalent quality are freely exchanged. A pallet pool must include all the following elements:

- 2.1 A trademarked marking scheme to identify pool ownership
- 2.2 A defined standard for the pallet specifying precisely how it is constructed and repaired when damaged
- 2.3 An inspection process to ensure compliance with said standards
- 2.4 Administration of points 1 to 3

- Closed Loop Pallet Pools – are administered centrally to ensure consistency across the pools
- Open Loop Pools – are the responsibility of a central authority e.g. EPAL (European Pallet Association Ltd).

## 3.0 Identifying Mark Definitions

### 3.1 UK Wood Packaging Material Marking Programme (UKWPMMP) ISPM 15 Mark.

The UKWPMMP Wood Packaging Material Marking Programme mark as per revision edition 2017 will be applied by EPAL licenced repairers as per attached flowchart.

### 3.2 Pooling Company Generic ISPM 15 Mark.

This mark will be issued by the Forestry Commission to the individual Closed Loop Pooling companies. The mark will be the same format as currently used by UK Wood Packaging Material Marking Programme (UKWPMMP) registered members, but rather than being site specific it will be company specific and will cover all repair and new manufacturing locations / approved sub-contractors linked to the relevant Closed Loop Pallet Pool, providing they have been independently audited and confirmed compliant in meeting all requirements for inclusion on to the exempt FC / UKWPMMP register. Open Loop Pallet Pools, EPAL / Brepal (Brepal is the UK & Ireland National Committee for EPAL) – only registered EPAL / Brepal repairers shall be considered for inclusion.



### 3.3 Closed Loop Approved Manufacturers and Repairers Mark

The application of this mark is discretionary. The Closed loop companies can instruct new pallet manufacturers and approved repairers to apply this mark to aid traceability, if at any time there was an incident reported regarding an individual pallet or pallets. The mark could take the form of e.g. a site specific code mark (**no marks** to be placed inside the box of the generic ISPM mark) or a nail with an identifying mark / number, etc.

## 4.0 Pool Pallet Manufacture

### 4.1 Closed Loop - Pallet Manufacture

Closed loop pool approved manufacturers shall be allowed to mark manufactured pallets with the generic mark of the relevant pool. The pooling company shall be responsible for setting up this process, the control and monitoring of compliance on a regular basis their pallet manufacturers and for ensuring the manufacturer's details are passed to the FC. The FC shall be able to audit the manufacturers at any time to audit manufactured stock and processes. The approved manufacturer shall be registered on the UKWPMMP in order to use the generic number and will be audited accordingly. A new registration must be made for each generic mark required by the individual manufacturer.

As well as the 6 monthly UKWPMMP audit, regular unannounced audits shall be carried out by the relevant pooling company on behalf of the FC to confirm continuous compliance by the individual Closed Loop Pooling companies and their respective approved manufacturers.

The audits reports will be shared and filed with the UKWPMMP secretariat and ultimately the FC.

### 4.2 Open Loop - Licenced EPAL Pallet Manufacture

These will be manufactured as per the EPAL pallet specification which includes the positioning of the manufacturers ISPM mark. Licenced manufacturer must be members of an accredited ISPM scheme e.g. UK manufacturers must be registered on the UKWPMMP.

EPAL / Brepal (shall ensure that the exemption criterion becomes an integrated feature of the monthly site audits.

## 5.0 Repair process

All marked pallets requiring repair shall be repaired using only treated timber (as defined in the ISPM15 Standard and in accord with the National Plant Protection Organisation), composite material excluded. Reclaimed timber components are not permitted (refer appendix 1 Flow Chart) unless they are re-treated as in 7.2.



## 5.1 Closed Loop Pallet Repairs

Only approved and registered sites / repairers shall be eligible to carry out repairs using heat treated components to pallets marked with the generic pooling company ISPM mark.

ISPM15 recommends preferably two legible marks to be visible on opposing perimeter faces of a treated pallet. One of these legible marks may be that of another country's manufacturer or repairer (ref appendix 2 Flow Chart).

When the pallet is being inspected to see if it requires repair the inspector must ensure both generic marks are legible. If not, then the non-compliant marks / blocks must be removed and the pallet remarked. If the pallet has a repairer / site identifying mark these should be obliterated (refer to as para 3.3) and if required by the pooling company the mark of the repairer should be applied.

## 5.2 Open Loop Pallet Pool Repairs

Licensed EPAL repairers shall apply their ISPM15 mark to one block assuming full responsibility and liability that the whole pallet is ISPM 15 compliant as per the EPAL repair regulations. The original manufacturer marks are not required to be removed or obliterated.

## 6.0 Current Pool Pallets in Circulation

### 6.1 Closed Loop

#### 6.1.1 Non ISPM 15 pallets

Any of these that are currently in circulation can be converted, by heat treating the pallet as per the UKWPMMP and the relevant generic mark applied.

#### 6.1.2 ISPM 15 pallets

**6.1.2.1** Any ISPM 15 compliant pallets currently in circulation (and the pooling company wishes them to remain ISPM 15 compliant) must have one generic mark added if the other original mark is legible, if it is not then both / all marks must be removed or obliterated.

**6.1.2.2** Any pallets that the pooling company no longer wishes to be heat treated must have all the heat treatment marks on the pallets obliterated.

### 6.2 Open Loop – EPAL

The EPAL specification has required their pallets to be ISPM 15 compliant since 2010.



## 7.0 Reclaimed Timber Components

**7.1** Undamaged timber components removed to facilitate repair can be reassembled back into same pallet.

**7.2** Reclaimed timber components (components collected and stored for reuse at a later stage) are not permitted to be used unless they have been re – treated In accordance with approved processes defined in the ISPM15 Standard (ref appendix 3 Flow Chart). Treated reclaimed timber components shall only be used from proven fully traceable and controlled stock verifiable by external audit.

**7.3** Existing marks on reclaimed re - treated timber components are not required to be removed or obliterated, the Closed loop generic marking and the EPAL repairers HT mark accept full responsibility and liability that the whole pallet is ISPM 15 compliant

**7.4** Reclaimed timber components that have not been subject to re – treatment but are ISPM15 compliant marked are not to be used in repair of standard non – treated pallets unless the mark has been removed or completely obliterated.

## 8.0 Removal / Obliteration of marks

### 8.1 Branded ISPM15 marks:

**8.1.1** To date, the results of testing using water based paint in the pooling company corporate colour has proved to be unsuccessful and the FC will not accept this method as meeting the ISPM15 Standard regarding obliteration. However, due to the fact that this could have potential commercial consequences, it is suggested that trials continue and the results shared with the FC.

**8.1.2** The original mark can be obliterated using a branded cross or number of crosses. The repairer must ensure that there is no dubiety that the mark is obliterated i.e. at least two of the original licence number digits must be illegible.

**8.1.3** Testing of painting over using black paint (stencil ink, emulsion etc.), other colours may work, has proved to be successful. The repairer shall ensure that the country code and supplier ID digits must be sufficiently overpainted to be indistinguishable.

### 8.2 Stencilled and printed marks:

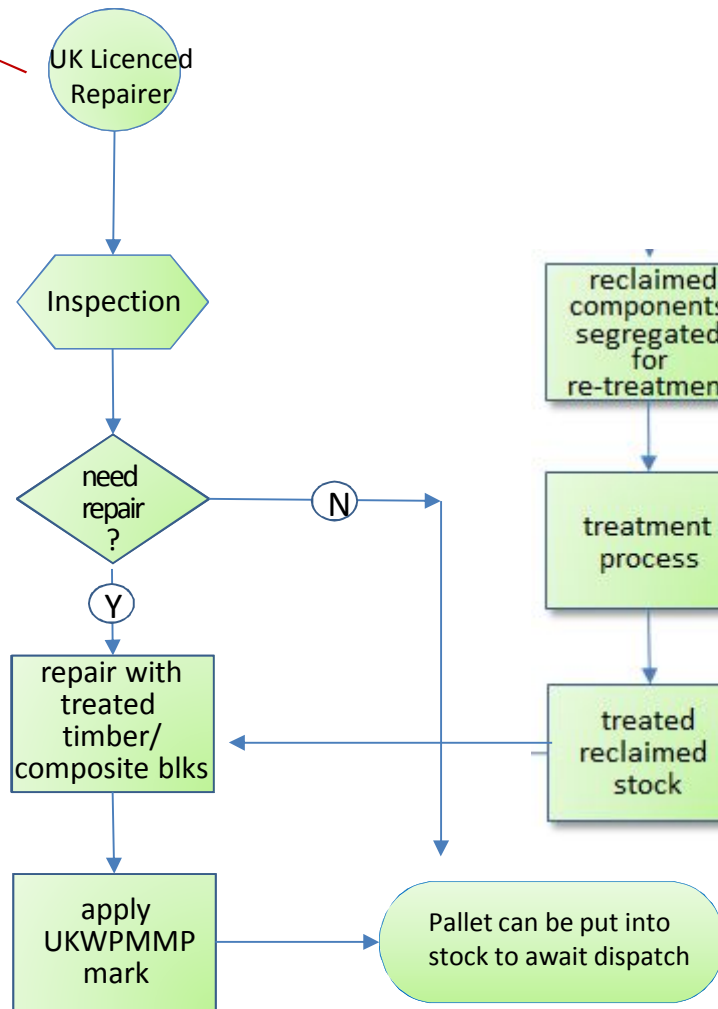
Tests have shown that using water based paint in the corporate colours does successfully obliterate the mark.

The repairer is responsible for ensuring that the paint dilution is at a ratio to ensure the original mark is completely obliterated.



# UKWPMMP Exempt Licenced EPAL Open Pool Repairer

Repairer is licenced by EPAL and is registered under the UKWPMMP exemption from retreatment and remarking requirement.



## Repair with Reclaimed Components as per Closed Loop process and procedures

It is the responsibility of the Licenced EPAL repairer to implement effective controls and records to ensure full traceability of reclaimed stock :

- qty reclaimed by component type
- date of treatment
- transfer into stock
- repair usage

packs of treated components must be clearly marked or appropriately identified

only one UKWPMMP mark needs be applied to an end middle block

The Epal Licenced repairers UKWPMMP ISPM 15mark shows that they accept full responsibility and liability for the whole EPAL Pallet

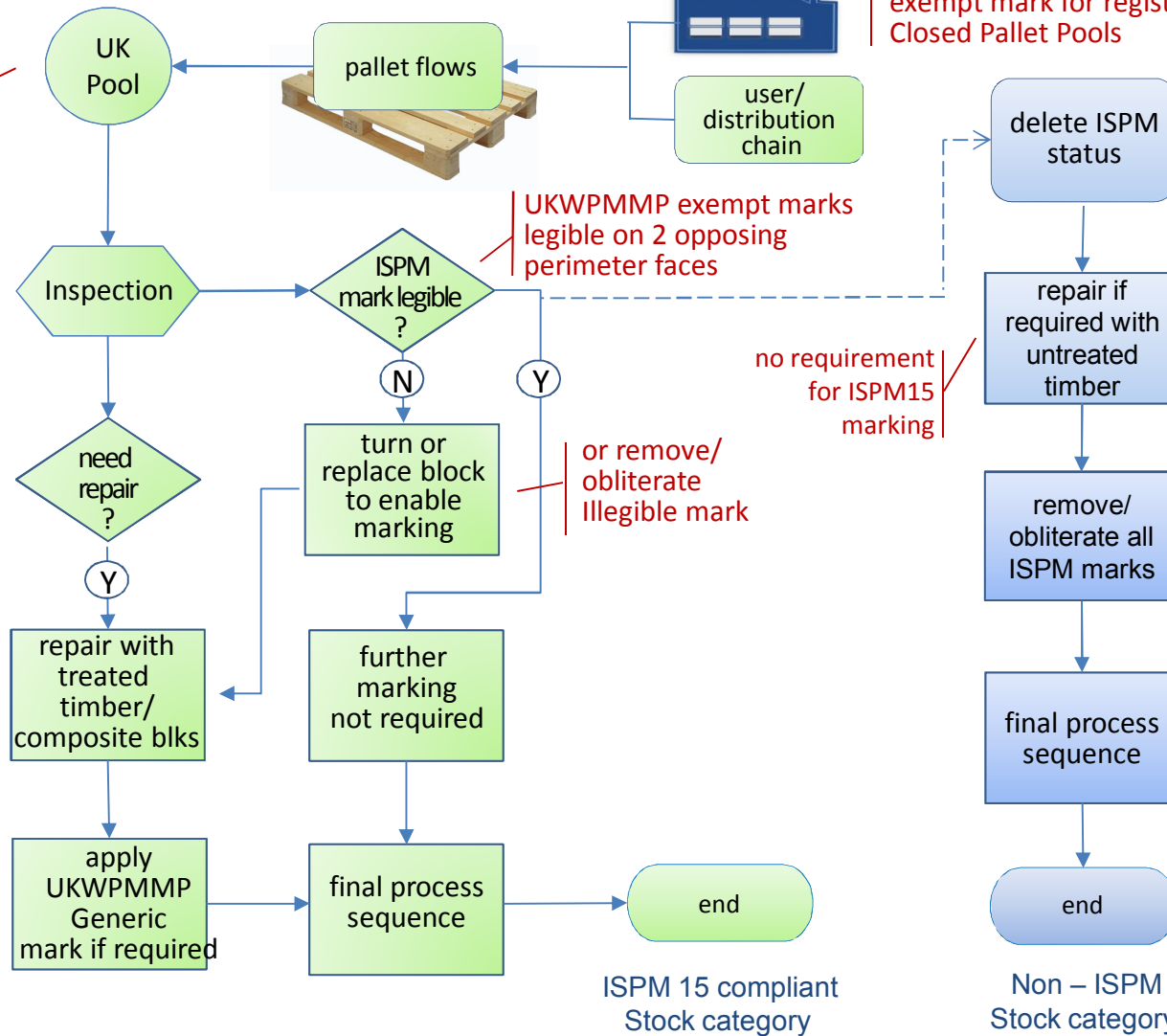


# UKWPMMP Exempt Closed Pools -

## Processing ISPM 15 Marked Pallets with new ISPM treated timber stocks

Pool and its sub contracted processors registered under. The UKWPMMP exemption from retreatment and remarking requirement.

pallet manufacturers approved to use UKWPMMP exempt mark for registered Closed Pallet Pools



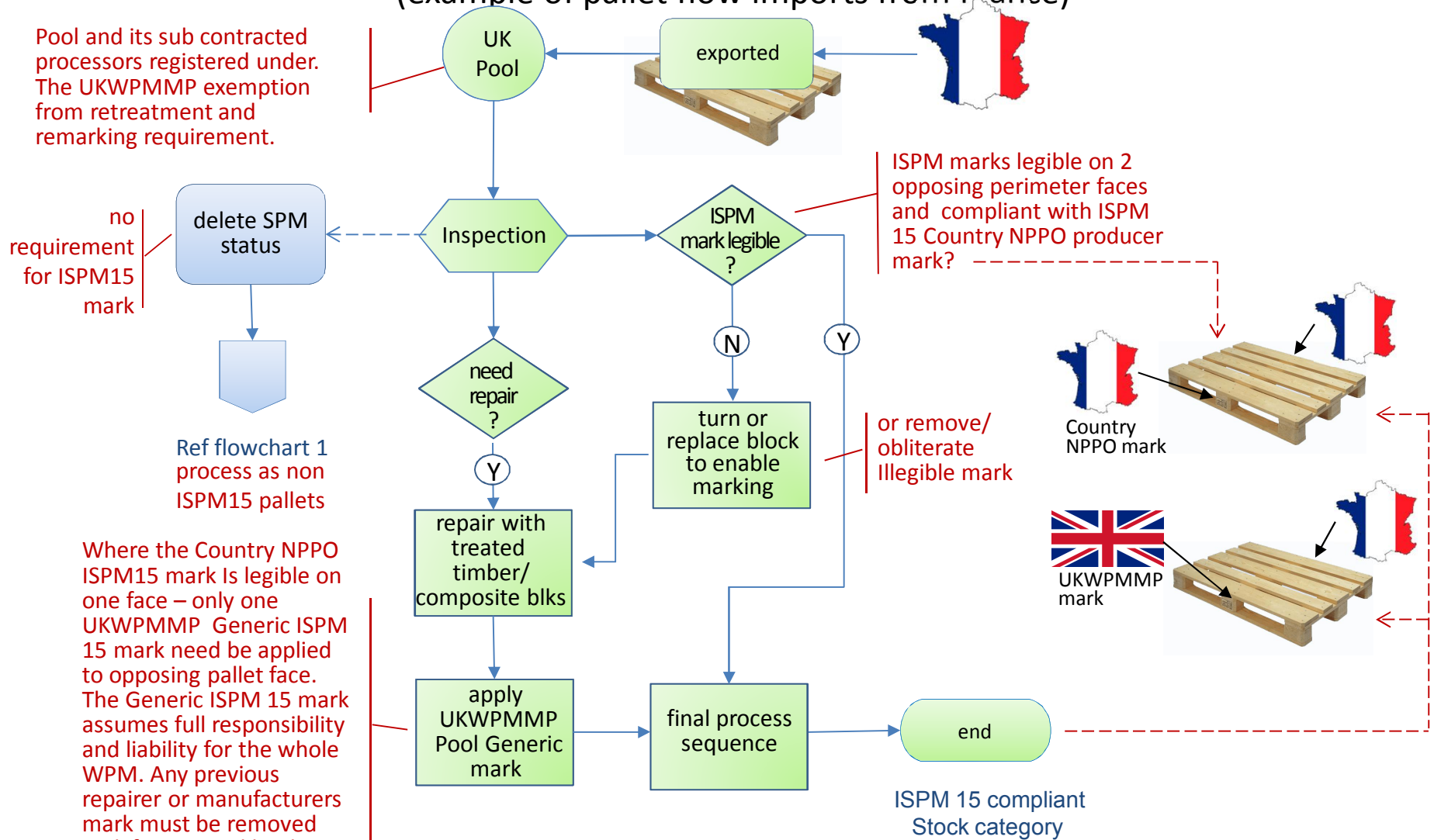
Only one UKWPMMP Generic ISPM 15 mark need be applied to opposing pallet face if the other mark is legible. The Generic ISPM 15 mark assumes full responsibility and liability for the whole WPM. Any previous repairer or manufactures mark must be removed and if instructed by the pooling company the repairers mark must be added.



# Imported Pallets Processed By UK Closed Pallet Pool

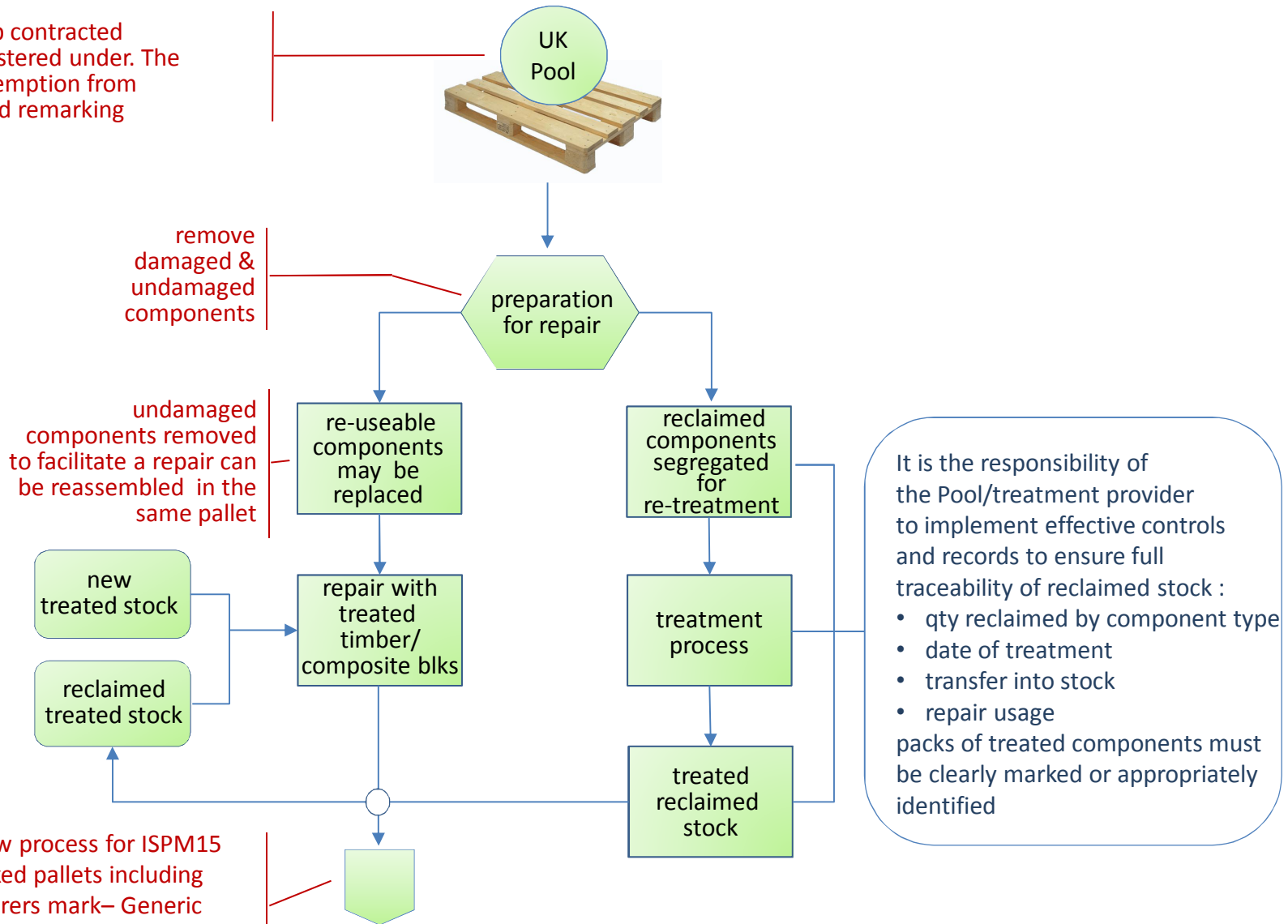
## Processing ISPM 15 Marked Pallets with new ISPM treated timber stocks

(example of pallet flow imports from France)



# UKWPMMP Exempt Closed Pools – Repair With Reclaimed Components

Pool and its sub contracted processors registered under. The UKWPMMP exemption from retreatment and remarking requirement.



follow process for ISPM15 marked pallets including repairers mark– Generic ISPM 15 mark assumes full responsibility and liability for the whole WPM article.

Ref flowchart 1