



Australian Government
 Department of Agriculture,
 Water and the Environment

THE AUSTRALIAN WOOD PACKAGING CERTIFICATION SCHEME FOR EXPORT

Version 4.1



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 Grain and Seed Exports Program
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Effective Date: December 2015
 Update: December 2020

FINAL

Version	Reason for Issue	Author
4.0	Clarify and update various sections	Grain and Seed Exports Program
4.1	Clarify various sections and update forms	Grain and Seed Exports Program

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1 Introduction

1.1 Background

Wood packaging such as pallets, dunnage, crating, packing blocks, drums, cases, spools/reels, bulk heads, load boards, pallet collars and skids—used in the transport of commodities during export—are often made from unprocessed raw wood. Packaging of this nature provides a pathway for the introduction and spread of pests and diseases, and therefore poses a significant plant health risk to importing countries.

In recognition of the plant health risk associated with wood packaging, the International Plant Protection Convention (IPPC) has adopted a wood packaging standard: 'International Standards for Phytosanitary Measures No.15: Regulation of Wood Packaging Material in International Trade' (ISPM 15).

ISPM 15 aims to significantly lessen the risk of unprocessed raw wood being used as a pathway for the introduction and the spread of most quarantine pests and diseases through international trade. As a signatory to the IPPC, Australia is obliged to implement this standard.

To meet the requirements of ISPM 15, all wood packaging material must be made of debarked wood and undergo either heat treatment (using a conventional steam or dry kiln heat chamber), dielectric heating, or fumigation (using either methyl bromide or sulfuryl fluoride). To verify that treatment has occurred and to provide traceability to the country of origin, an internationally recognised ISPM 15 certification mark must be applied to the treated wood packaging.

The Australian Wood Packaging Certification Scheme (AWPCS) is a certification scheme that ensures Australian treatment providers and wood packaging manufacturers produce wood packaging material that meet the ISPM 15 standard.

There are three main activities involved in the production of approved wood packaging material (including dunnage): treating, manufacturing and marking. These activities can be performed by separate entities, or one entity can do several or all of these activities.

Under the AWPCS, wood packaging manufacturers and treatment providers who meet the requirements of ISPM 15 must be authorised by the Department of Agriculture, Water and the Environment to apply the internationally recognised mark to wood packaging material produced for use in the export trade.

The AWPCS is voluntary, however participants in the AWPCS agree to be bound by its rules and may face suspension from the AWPCS in the event that they breach a requirement.

The ISPM 15 mark can only be used in Australia by participants in the AWPCS who are authorised by the department.

1.2 Scope

This document details the requirements and procedures for the certification of wood packaging material for use in export consignments and is intended for use by Australian treatment providers, wood packaging manufacturers and accredited certification bodies.

This AWPCS incorporates the 2018 revision of the revised ISPM 15 standard.

1.3 Related material

[International Standards for Phytosanitary Measures 5 \(ISPM 5\): Glossary of Phytosanitary Terms, FAO, 2018.](#)

[International Standards for Phytosanitary Measures 7 \(ISPM 7\): Export Certification System, Publication, FAO, 2011.](#)

[International Standards for Phytosanitary Measures 13 \(ISPM 13\): Guidelines for the Notification of Non-compliance and Emergency Action, FAO, 2001.](#)

[International Standards for Phytosanitary Measures \(ISPM 15\): Regulation of Wood Packaging in International Trade, FAO, 2019.](#)

[ISO/IEC 17065 – Conformity assessment – Requirements for bodies certifying products, processes and services.](#)

[ISO 19011:2018 – Guidelines for auditing management systems.](#)

1.4 Review and amendments

This document will be reviewed and updated as needed to reflect any changes made to the ISPM 15 standard.

The current version of the AWPCS will be maintained on the department's [website](#).

Amendments to the AWPCS will be dated and posted on the above website.

1.5 Definitions

The following table defines the terms and acronyms used in this document:

Term	Definition
Accreditation body	An organisation approved by the department, to accredit certification bodies to audit and certify facilities. For the purposes of the AWPCS, this organisation is the Joint Accreditation System of Australia and New Zealand (JAS-ANZ) .
Ambient temperature	The temperature of the air immediately surrounding the fumigation enclosure (measured in the shade).

Term	Definition
AWPCS	Australian Wood Packaging Certification Scheme.
AWPCS Register	A list of treatment providers and wood packaging manufacturers certified under the AWPCS, accessible on the department website.
Bark-free wood	Wood from which all bark, except ingrown bark around knots and bark pockets between rings of annual growth, has been removed.
Certification body	A company or organisation accredited by JAS-ANZ to assess the suitability of a treatment provider or a wood packaging manufacturer for certification under the AWPCS.
ISPM 15 certification mark	A recognised mark containing a certification number, country code, treatment code and the IPPC symbol that is to be applied to wood packaging material by the certified facility in accordance with the AWPCS.
Certification number	A unique number allocated by the department to a treatment provider or wood packaging manufacturer upon certification.
Certified facility	A treatment provider or wood packaging manufacturer that has been approved by a certification body to participate in the AWPCS.
Chemical Pressure Impregnation (CPI)	Treatment of wood with a chemical preservative through a process of pressure in accordance with an officially recognised technical specification.
Commission on Phytosanitary Measures (CPM)	The IPPC is governed by the Commission on Phytosanitary Measures (CPM). The CPM meets annually at the Food and Agriculture Organization of the United Nations headquarters in Rome, Italy, to promote cooperation to help implement the objectives of the IPPC. In particular, the CPM reviews the state of plant protection around the world, identifies action to control the spread of pests into new areas, develops and adopts international standards, establishes rules and procedures for resolving disputes, adopts guidelines for the recognition of regional plant protection organisations and cooperates with international organisations on matters covered by the IPPC.

Term	Definition
Commodity	A type of plant, plant product, or other article being moved for trade or other purpose.
Consignment	A quantity of plants, plant products and/or other articles being moved from one country to another and is covered, when required, by a single phytosanitary certificate (a consignment may be composed of one or more commodities or lots).
Container (also freight container)	Standardised transportation units, totally enclosed and weatherproof, having a rigid roof, rigid side walls and a floor, having at least one wall equipped with doors and intended to be suitable for transporting a variety of cargo.
Debarked wood	Wood that has been subjected to any process that results in the removal of bark (debarked wood is not necessarily bark-free wood).
The Department of Agriculture, Water and the Environment	Australian Government Department of Agriculture, Water and the Environment (the department), is the National Plant Protection Organisation (NPPO) of Australia.
Dielectric heating	Dielectric heating is a process that uses electromagnetic waves to create heat. Where dielectric heating such as microwaves are used, wood packaging material must not exceed 20 cm when measured across the smallest dimension of the piece. The stack must be heated to achieve a minimum temperature of 60 °C for one (1) minute. The target temperature must be reached within 30 minutes from the start of the treatment. Dielectric heating simultaneously heats wood across the entire profile of the wood. Therefore, the target temperature of 60 °C can be measured at its surface rather than the core.
Dosage	The calculated amount of fumigant applied to a fumigation enclosure to treat a consignment. Usually expressed as weight of chemical per volume of treated space, for example, g/m ³ .
Dunnage	Wood packaging material used to secure or support a commodity but is not part of the commodity.

Term	Definition
Entity	<p>Refers to any of the following:</p> <ul style="list-style-type: none"> • a company • a partnership • a person in the capacity of trustee • any other person that is a wood packaging manufacturer and/or treatment provider.
Facility	<p>Under the AWPCS, a facility refers to a fixed site where heat treatment, dielectric heating, fumigation or manufacturing of wood packaging is carried out.</p>
Fumigant	<p>A chemical that, at a particular temperature and pressure, can exist in a gaseous state in sufficient concentration and for sufficient time to be lethal to insects or other pests.</p>
Fumigation	<p>Treatment with a chemical agent that reaches the commodity wholly or primarily in a gaseous state.</p>
Hazard area	<p>Any area, in proximity to a fumigation enclosure, into which the fumigant may escape in hazardous concentrations.</p>
Heat treatment	<p>The process in which a commodity is heated until it reaches a minimum temperature across the wood profile, including the surface and core, for a minimum period of time according to an officially recognised technical specification.</p>
Initial site audit	<p>An audit performed at the time of certification to verify that a facility is capable of meeting the requirements prescribed in the AWPCS. The audit also verifies that the facility's quality manual is being followed and that employees of the facility are sufficiently trained.</p>
IPPC	<p>International Plant Protection Convention.</p>
ISO	<p>International Organization for Standards.</p>
ISPM	<p>International Standards for Phytosanitary Measures.</p>
Kiln-drying	<p>A process in which wood is dried in a closed chamber using heat and/or humidity control to achieve the required moisture content.</p>

Term	Definition
Manufacturing	<p>Includes all activities that constitute the construction of a finished article of wooden packaging, for example, nailing pieces of timber to construct a frame, or support structure, constructing crates or pallets.</p> <p>Note: Activities exempted from the definition of manufacturing are specified in Clause 3.3.</p>
NATA	<p>National Association of Testing Authorities, Australia.</p>
NPPO	<p>National Plant Protection Organisation; Official service established by a government to discharge the functions specified by the IPPC. In Australia, the NPPO is the Department of Agriculture, Water and the Environment.</p>
Official	<p>Established, authorised or performed by an NPPO.</p>
Packaging	<p>Material used in supporting, protecting or carrying a commodity.</p>
Pallet	<p>A platform used to support cargo during shipment. Pallets are generally of a standard dimension to allow for easy stacking.</p>
Pest	<p>Any species, strain or biotype of plant, animal or pathogenic agent injurious to plants or plant products.</p>
Phytosanitary measure	<p>Any legislation, regulation or official procedure having the purpose to prevent the introduction and/or spread of quarantine pests, or to limit the economic impact of regulated non-quarantine pests.</p>
Quality manual	<p>A written document that describes the operational procedures in place to meet a prescribed standard.</p>
Quality system	<p>A collection of operational procedures a facility has in place to meet a prescribed standard.</p>
Raw wood	<p>Wood that has not undergone processing or treatment.</p>
Recycle	<p>A process whereby a previously used article of wood packaging material is dismantled either partially or completely and the components used without further reworking in the manufacture of a new article of wood packaging material.</p> <p>Note: Recycling may include 're-manufacturing'.</p>

Term	Definition
Re-manufacture	A process whereby a previously used article of wood packaging material is completely dismantled and the components used, either in their original form or after re-sawing, in the manufacture of another article of wood packaging material. Re-manufactured wood packaging material may or may not incorporate new and previously unused components.
Repair	A process whereby a previously used article of wood packaging material has one or more components removed and replaced with new and previously unused wood.
Re-use	A second or subsequent use of a unit of wood packaging material that is not changed or altered in any way and does not require official intervention.
Treatment	An officially authorised procedure for the killing or removal of pests or rendering pests infertile.
Treatment date	The date the treatment process, including any curing, is completed.
Treatment provider	An organisation, company or person who owns or operates a facility for performing an approved treatment.
Veneer	Wood peeled from a log or sliced from timber, intended to be glued to other timber products or other veneers to form a wood composite.
Veneer peeler core	The central portion of wood remaining after a log is peeled during the production of plywood layers or in the production of veneer. Often the peeling process involves heating the wood in a hot water bath for an extended period of time.
Verification audit	An audit performed to verify that operations continue to meet the requirements of the AWPCS and that facility operations continue to meet the specifications of the facility's quality manual.
Wood	A commodity class for round wood, sawn wood, wood chips or dunnage, with or without bark.
Wood packaging manufacturer	A person, company or organisation who owns or operates a facility producing wood packaging material.
Wood packaging material	Wood or wood products (excluding paper products) used in supporting, protecting or carrying a consignment (includes dunnage).

1.6 International Standards and Legislation

The following list outlines the policy and legislation that applies to the AWPCS:

- [International Standards for Phytosanitary Measures \(ISPM 15\): Regulation of Wood Packaging in International Trade, FAO, 2018.](#)
- [Competition and Consumer Act 2010 \(previously the Trade Practices Act 1974\)](#)
- [Trade Marks Act 1995](#)

Wood packaging material intended for export must meet the conditions of entry specified by the importing country.

Note: It is the responsibility of the exporter to know and meet all importing country requirements.

Where an importing country has implemented ISPM 15, and wood packaging material that does not carry the required ISPM 15 certification mark is exported to that country, the importing country may take action. This action may take the form of treatment, disposal or the consignment may be refused entry.

Note: Compliance with the AWPCS is not to be taken as a guarantee that any particular goods will be granted access to any overseas markets.

1.7 Responsibilities of each party

The Department of Agriculture, Water and the Environment

The department is responsible for:

- approving JAS-ANZ as the accreditation body
- responding to enquiries of a technical nature
- maintaining the department's website including the AWPCS Register
- the regular review of the AWPCS, including the provision of updates detailing any additional requirements of the AWPCS or ISPM 15 standard and, as appropriate, details of any newly approved treatment options
- liaising with JAS-ANZ the approved accreditation body and monitoring the implementation and on-going effectiveness of the AWPCS
- providing unique certification numbers to approved treatment providers and/or manufacturers through certification bodies on receipt of written requests
- liaising with international government agencies and investigating any non-conformity notification issued by an overseas country.

Note: Communication sent directly to the department from certification bodies should also be copied to JAS-ANZ and information may be provided to certification bodies through JAS-ANZ.

The accreditation body (JAS-ANZ)

The Department of Agriculture, Water and the Environment approved JAS-ANZ accreditation body is responsible for:

- the accreditation of certification bodies to provide certification services under the AWPCS
- on-going monitoring of certification bodies
- liaising with certification bodies as an information conduit between the department and certification bodies
- advising certification bodies of the requirements of the AWPCS
- maintaining a current list of certification bodies accredited to provide certification under the AWPCS
- notifying the department of any changes to the accreditation status of certification bodies.

The certification body

The certification body is responsible for:

- reviewing AWPCS applications
- reviewing the applicant's quality manual
- conducting site audit(s) to verify the implementation of procedures documented in the facility's quality manual
- scheduling and conducting on-going verification audits of certified facilities
- decisions regarding the granting, maintaining, reducing, extending, withdrawing and cancelling of certification
- providing input regarding certifications under the scheme into the AWPCS and JAS-ANZ registers
- advising certified facilities of any amendments to the AWPCS and or ISPM 15 standard
- notifying the department in writing of any changes to a treatment provider or manufacturer's certification status
- advising the department of certified company's non-conformity with the requirements of the AWPCS
- providing a written six-monthly audit summary report to the department.

Treatment providers and wood packaging manufacturers

Treatment providers and wood packaging manufacturers are responsible for:

- complying with all relevant legislation, safety codes, or licensing applicable to the State or Territory in which the treatment is being performed
- ensuring that all treatments are performed in accordance with the AWPCS
- ensuring that all staff members responsible for quality control activities, or involved in the treatment and production of certified wood packaging material, are aware of the

requirements of the AWPCS and are appropriately trained in all functions specific to this scheme

- identifying and providing appropriate employees to assist the certification body during audits
- correct application of the ISPM 15 certification mark (if applicable)
- destruction of the ISPM 15 certification mark upon cancellation from the AWPCS.

1.8 Fees

The applicant is responsible for payment of all fees and charges associated with obtaining and maintaining certification under the AWPCS.

1.9 Regulated wood packaging material

The AWPCS applies to coniferous (softwood) and non-coniferous (hardwood) raw wood packaging material that may serve as a pathway for plant pests posing a pest risk, mainly to living trees.

The AWPCS covers wood packaging material such as pallets, dunnage, crating, packing blocks, drums, cases, spools/reels, bulk heads, load boards, pallet collars, and skids, which can be present in almost any imported consignment, including consignments that would not normally be the target of phytosanitary inspection.

Note: Consignments of wood (for example, timber/lumber) may be supported by dunnage that is constructed from wood of the same type and quality and meets the same phytosanitary requirements as the wood in the consignment. In such cases, the dunnage may be considered as part of the consignment and may not be considered as wood packaging material in the context of the AWPCS.

1.10 Veneer peeler core

Veneer peeler core is not regulated under the ISPM 15 standard. Exporters may face difficulties when it is used to manufacture pallets/crates as the wood is no longer readily identified as veneer peeler core. As a result, when a consignment arrives in an overseas country the packaging material may be viewed as being untreated, which may lead to the packaging being ordered for treatment on arrival or possibly the rejection of the entire consignment.

If a company wishes to apply the ISPM 15 certification mark to wooden packaging material manufactured from veneer peeler core, the company must be certified under the AWPCS and the packaging material must be treated and manufactured in accordance with the requirements of the AWPCS. This also applies where a company wishes to apply the ISPM 15 certification mark to wooden packaging material manufactured from veneer peeler core.

1.11 Exemptions

The following articles are considered low risk and are exempt from the provisions of the AWPCS. This is because the articles have either undergone treatment processes that are

sufficiently similar to those proposed by the ISPM 15 standard to render them sufficiently less of a risk, or the nature of the material used in production poses little pest risk:

- wood packaging made entirely from thin wood (6 millimetres 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.

Note: Articles that are exempt from the ISPM 15 standard must not to carry the ISPM 15 certification mark, unless the company applying the ISPM 15 certification mark is certified under the AWPCS.

Note: Not all types of gift boxes or barrels are constructed in a manner that renders them pest free (exempt) and therefore certain types may be considered to be within the scope of the AWPCS. Where appropriate, specific arrangements related to these types of commodities may be established between importing and exporting NPPOs.

Note: The IPPC certification is a registered trademark and fraudulent use is a breach of the *Competition and Consumer Act 2010* and the *Trade Marks Act 1995* (Cth).

The use of the ISPM 15 certification mark (or a deceptively similar mark) by those not certified under the AWPCS is:

- an infringement of Section 120(1) of the *Trade Marks Act 1995* (Cth)
- misleading or deceptive conduct under Section 18 of the *Competition and Consumer Act 2010* (Cth).

2 Approved Treatment Options

Presently, the only internationally accepted treatment options under the AWPCS are heat treatment (using a conventional steam or dry kiln heat chamber), dielectric heating or fumigation (using either methyl bromide or sulfuryl fluoride).

Where wood packaging has been treated in accordance with the requirements of the AWPCS, the treatment is considered to be effective for the entire life of the article.

As new technical information becomes available, existing treatments may be reviewed and modified, and alternative treatments or new treatment schedule(s)/standard(s) for wood packaging material may be adopted by the IPPC's Commission on Phytosanitary Measures. If a new treatment or revised treatment schedule/standard is adopted for wood packaging material and incorporated into ISPM 15, material treated under previous treatment or schedule does not be re-treated or re-marked.

2.1 Heat treatment (HT)

Where heat is the chosen treatment option, all wood packaging material must be heated in accordance with a specific time-temperature schedule that achieves a **minimum wood core temperature of 56 degrees Celsius for a minimum duration of 30 continuous minutes.**

Kiln-drying, heat enabled chemical pressure impregnation (CPI) or other treatments may be considered heat treatments provided that these treatments meet the heat treatment specifications and dosage as listed above. For example, CPI may meet the heat treatment specifications in the AWPCS through the use of steam, hot water, or dry heat.

Note: The requirements that must be met by heat treatment providers are provided in [Appendix 1 - Requirements for AWPCS Heat Treatment Providers.](#)

2.2 Dielectric heating (DH)

Where dielectric heating (microwaves) is used, the wood packaging material dimensions must not exceed 20 centimetres when measured across the smallest section of the piece. The stack must be heated to achieve a minimum temperature of 60 degrees Celsius for one continuous minute throughout the entire profile of the wood, including its surface. The prescribed temperature must be reached within 30 minutes from the start of the treatment. In a stack, each piece treated must meet the above requirements.

The following factors must be considered for a dielectric heating chamber to meet the treatment requirements:

- The dimension of the wood packaging material must not exceed 20 centimetres across the smallest dimension.
- Irrespective of whether dielectric heating is conducted as a batch process or as a continuous (conveyor) process, the treatment is monitored in the wood where the temperature is likely to be the lowest (normally on the surface) to ensure the target temperature is maintained throughout the entire profile of the wood (including the surface). For measuring the temperature, at least two temperature sensors are recommended to ensure that any failure of a temperature sensor is detected.
- The treatment provider has initially validated that the wood temperatures reach or exceed 60 degrees Celsius for one continuous minute throughout the entire profile of the wood (including its surface).

- For wood exceeding 5 centimetres in thickness the application of dielectric heating at 2.45 gigahertz requires bidirectional application, or multiple waveguides, for the delivery of microwave energy to ensure uniformity of heating.
- Any bark remaining must be included in the dimension measurement.
- Temperature sensors and data recording equipment are calibrated in accordance with the manufacturer's instructions at a frequency specified by the NPPO.
- For the purpose of auditing, the treatment provider must keep records of heat treatments and calibrations for a period of 2 years.

Note: The requirements that must be met by heat treatment providers are provided in [Appendix 2 - Requirements for AWPCS Dielectric Heat Treatment Providers](#).

2.3 Fumigation with methyl bromide

Where fumigation with methyl bromide is the chosen treatment option, all wood packaging material must be fumigated in accordance with the minimum standard described in [Appendix 3 - Requirements for AWPCS Methyl Bromide Fumigation Providers](#).

The minimum temperature should not be less than 10 degrees Celsius and the minimum exposure time must not be less than 24 hours.

2.4 Fumigation with sulfuryl fluoride

Where fumigation with sulfuryl fluoride is the chosen treatment option, all wood packaging material must be fumigated in accordance with the minimum standard described in [Appendix 4 - Requirements for AWPCS Sulfuryl Fluoride Fumigation Providers](#).

Minimum concentration must be achieved either:

- at or above 30 degrees Celsius over 24 hours
- or
- at or above 20 degrees Celsius over 48 hours.

See [Table 1](#).

3 Approved Wood Packaging Material

3.1 Definition of manufacturing

For the purpose of the AWPCS, manufacturing includes all activities that constitute the construction of a finished article of wood packaging. For example, nailing pieces of timber to construct a frame or support structure, constructing crates or pallets.

Entities that undertake the activities listed above are recognised as ‘wood packaging manufacturers’ and require certification under the AWPCS to apply the internationally recognised ISPM 15 certification mark and produce ISPM 15 compliant wood packaging.

3.2 Off-site manufacturing

Manufacturers that operate from a fixed site and intend to travel to other sites to assemble wood packaging material, must apply for a second certification number for the off-site manufacturing activities. This enables the manufacturer to operate as a mobile wood packaging material manufacturer from any site.

The following requirements must apply to certified off-site manufacturers:

- All wood packaging material that is assembled or manufactured at an off-site location must bear the ‘off-site manufacturing’ ISPM 15 certification mark.
- Company procedures for manufacturing off-site must be documented in the manufacturer’s quality manual and may be included as an additional schedule.
- Compliance with all requirements that apply to manufacturers under the AWPCS, including procedures for managing the security of devices used to apply the ISPM 15 certification mark, must be demonstrated.

3.3 Activities exempted from the definition of manufacturing

For the purposes of the AWPCS, the following activities are exempted from the definition of manufacturing:

- Where an entity purchases certified timber and/or dunnage that is stamped with the ISPM 15 certification mark and then the timber is sawn into smaller pieces/lengths used to support cargo during export.

Note: The full ISPM 15 certification mark must be correctly displayed on each of the cut pieces.

- Where an entity purchases a finished wood packaging article, such as a crate or box, from a certified facility and nails the lid on after placing the consignment.
- Where an individual purchases a wood packaging kit from an authorised entity that is unassembled and then assembles the kit around a product without adding or subtracting components (a wood packaging kit is comprised of all the necessary components required for assembly into a single pallet, box or crate).

3.4 Off-site fumigation treatment

Fumigation treatment providers that operate from a fixed site and intend to travel to other sites to treat wood packaging material must apply for a second certification number for the off-site manufacturing activities. This enables treatment providers to operate as a mobile wood packaging material treatment provider from any site.

The following requirements must apply to certified off-site fumigation treatment providers:

- All wood packaging material that is treated at an off-site location must bear the 'off-site treatment' ISPM 15 certification mark.
- Company procedures for treating off-site must be documented in the provider's quality manual and may be included as an additional schedule.
- Compliance with all requirements that apply to treatment providers under the AWPCS, including procedures for managing the security of devices used to apply the ISPM 15 certification mark, must be demonstrated.

4 The ISPM 15 Certification Mark

4.1 Application of the ISPM 15 certification mark

All wood packaging material that has been subjected to an approved phytosanitary treatment and is produced for use in export consignments to countries that have implemented ISPM 15, must display an internationally recognised ISPM 15 certification mark, as specified in [Clause 4.3](#) of this document.

The ISPM 15 certification mark is non-transferable and ultimately provides traceability to the treatment provider and manufacturer. Each ISPM 15 certification mark is unique to the individual treatment provider or manufacturer of the wood packaging material.

The ISPM 15 certification mark applied to wood packaging material prepared for export must be:

- legible
- permanent and not transferable
- stamped or branded onto the wood packaging material
- placed in a clearly visible location when the wood packaging is in use
- must be on at least two opposite sides of the wood packaging unit.

Note: The ISPM 15 certification mark must not be hand drawn or made from tags or stickers. It must be applied by a stamp or brand as stated above.

Examples:

On pallets, the ISPM certification mark could be on the outer faces of the blocks as these are more visible to an inspector.

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 wood 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. This approach to the application of the ISPM 15 certification mark applies only to composite single units, not to temporary assemblies of wood packaging material.

Where an article such as a pallet or crate is manufactured from non-regulated material (such as plywood) and the frame is made from regulated wood (such as pine), it is acceptable to mark at least two opposite sides of the non-regulated material on the finished item of wood packaging as this verifies that the regulated material has been treated.

The ISPM 15 certification mark can be any colour, but the use of red and orange should be avoided as these colours are used in the labelling of dangerous goods.

As treated wood for use as dunnage may not be cut to the final length until loading of a consignment takes place, it is important that exporters ensure that all dunnage used to secure or support a consignment is treated and correctly displays the entire ISPM 15 certification mark.

Note: Small pieces of wood that do not include all the required elements of the ISPM 15 certification mark should not be used for dunnage. It is advised that the ISPM 15 certification mark be applied to pieces of wood intended for use as dunnage along the entire length at very short intervals, (where very small pieces of wood are subsequently cut for use as dunnage, the cuts should be made so that an entire ISPM 15 certification mark is present on each of the individual pieces of dunnage).

The ISPM 15 certification mark must not be used for any other purposes, such as advertising or on company stationery. The certification bodies ensure the use of the ISPM 15 mark by their clients satisfies the following conditions:

- Application of the ISPM 15 certification mark must only be on certified products that are entitled to carry the mark, such as treated wood packaging materials.
- Application of the ISPM 15 certification mark on stationary, promotional material and literature is prohibited.

Note: The entities that are not certified under AWPCS are prohibited to use or apply and display ISPM 15 certification marks.

The ISPM 15 certification mark must be applied to wood packaging material after an approved treatment has been administered by an AWPCS certified treatment provider. The ISPM 15 certification mark must not be applied prior to treatment.

The ISPM 15 certification mark must be applied to either the finished article or to the components of the wooden packaging by the AWPCS certified manufacturer prior to assembly of the finished article.

If marking is done prior to the assembly of the finished article, then the:

- ISPM 15 certification mark must only be applied to timber that has been treated in accordance with the AWPCS and has been sourced from a certified treatment provider

- certified manufacturer's quality manual must document the procedures for the application of the mark to ensure that only treated timber has been used in the finished article.

4.2 Security of the ISPM 15 certification mark

The following requirements must apply to managing the security of devices used to apply the ISPM 15 certification mark to wood packaging:

- All certified entities must have a record of the number of devices they possess for the purpose of applying the ISPM 15 certification mark to wood packaging material.
- All certified entities must implement procedures to prevent the loss or misuse of any device and must report any loss to their AWPCS certification body immediately.
- All devices used for applying the ISPM 15 certification mark must be kept in a secure manner when not in use. For example, in a lockable cabinet. For devices such as programmable printing devices that are attached to processing equipment, where it is impractical to lock when not in use, the organisation must have procedures to prevent misuse or removal.
- A register listing the number of devices owned by the facility and persons who have authority to use these devices must be maintained by the certified entity.
- If a device is no longer in use, is damaged or due for disposal, the date and method of disposal is to be recorded by the certified entity. Devices must be disposed of by the certified entity in such a way that they are rendered completely unusable.
- All procedures relating to maintaining the security of the mark must be documented in the AWPCS certified entity's quality manual.

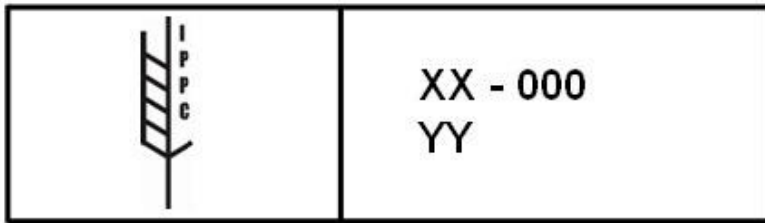
Note: Loss of an ISPM 15 certification device is considered a major non-conformity and will result in revocation of the AWPCS.

4.3 Specifications of the ISPM 15 certification mark

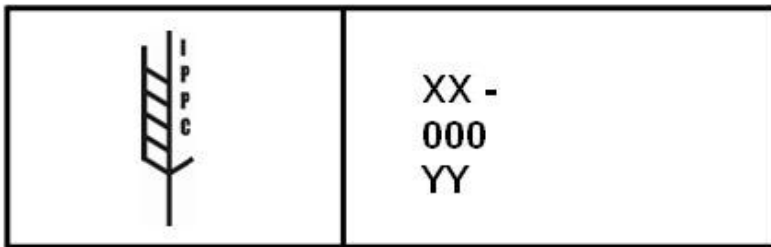
The ISPM 15 certification mark must be applied according to the models shown in examples 1–6 below. This includes shape, perimeter lines and the interior dividing lines.

There is no specific size set for the ISPM 15 certification mark, but it should be sufficient in size to be legible. For example, it should be large enough to enable the codes contained within the mark to be read by a front-line inspector. The size of these codes and the IPPC symbol in relation to each other should be according to one of the models shown in examples 1–6.

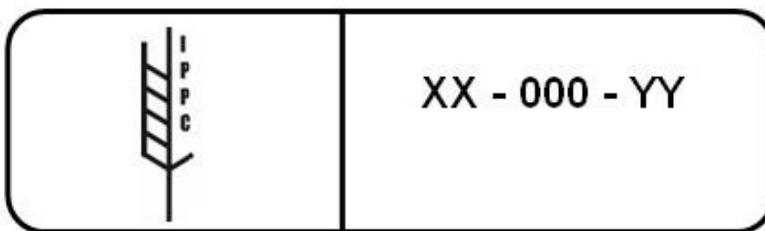
Example 1:



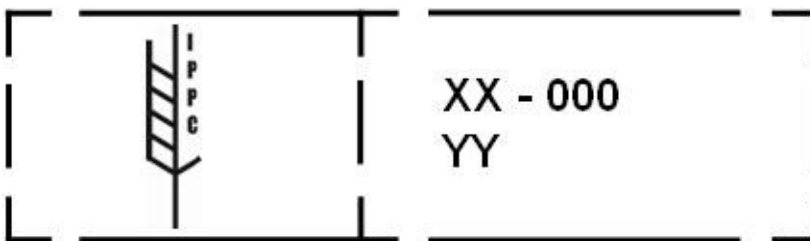
Example 2:



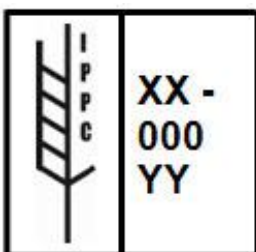
Example 3: This represents a prospective example of an ISPM 15 certification mark with the border with rounded corners.



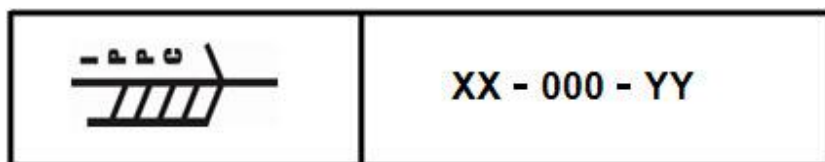
Example 4: This represents a prospective example of an ISPM 15 certification mark applied by stencilling; small gaps may be present in the border, and the vertical line, and elsewhere among the components of the mark.



Example 5:



Example 6:



The ISPM 15 certification mark must include:

- The IPPC certification symbol.
- The two letter ISO country code shown in the examples as XX (AU is the country code for Australia).
- A hyphen separating the ISO country code from the unique authorised certification number assigned by the department to the provider.
- The unique department authorised certification number shown in the examples as 000.
- If the unique department authorised certification code and the treatment code (shown in the example as YY) appear on the same line, a hyphen is required to separate the codes as in examples 3 and 6 above.
- A hyphen separating the unique department authorised certification code from the treatment code, in the instance both appear on the same line, as in examples 3 and 6 above.
- One treatment code, either:
 - HT the code for heat treatment, or
 - DH the code for dielectric heating, or
 - MB the code for methyl bromide fumigation, or
 - SF the code for sulfuryl fluoride fumigation.

Other information may also be included **outside** of the border of the ISPM 15 certification mark provided that it is not confusing, deceptive or misleading. Examples of permitted additional information may include date of manufacture, batch number, company name or logo.

4.4 Unapproved use of the ISPM 15 certification mark

The IPPC certification symbol is a registered trademark in Australia. The department is authorised to approve others to use the IPPC symbol (as part of the ISPM 15 certification mark) and does so through certification under the AWPCS.

Failure to comply with the requirements specified in the AWPCS concerning the use of the ISPM 15 certification mark will result in the immediate revocation of a facility's certification and they will no longer be permitted to use the ISPM 15 certification mark.

The use of the ISPM 15 certification mark (or a deceptively similar mark) by those not certified under the AWPCS is:

- an infringement of Section 120(1) of the *Trade Marks Act 1995* (Cth)
- misleading and deceptive conduct under Section 52 of the *Trade Practices Act 1974* (Cth).

4.5 Use of debarked wood

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

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

Note:

- **For methyl bromide and sulfuryl fluoride treatment, the removal of bark must be carried out before the treatment because the presence of bark on wood affects the efficacy of the treatment.**
- **For heat treatment and dielectric heating, the removal of bark can be carried out before or after treatment.**

4.6 Heat treated, dielectric heated and fumigated wood packaging material

The following requirements must apply in the manufacture of heat treated, dielectric heated and fumigated wooden packaging material:

- All ISPM 15 certification marks must bear the one certified entity's certification number.
- The application of two ISPM 15 certification marks with different treatment codes side by side on an article is not permitted.
- Two different treatment codes within the ISPM 15 certification mark is not permitted.
- Wood used in the manufacture of an article must be marked according to the treatment it has undergone:
 - heat treated timber must be marked with the HT code,
 - dielectric heating must be marked with the DH code and
 - fumigated timber must be marked with the MB or SF code.

- Traceability systems must meet all requirements detailed in the AWPCS, and must be such that the fate of the treated timber used in the construction of the wood packaging material can be traced through the export supply chain, from receipt to despatch to clients.
- All treated timber received and used in the production of wood packaging material must be accounted for.

Examples:

Where the frame of an article is not visible, and is constructed from timber that has been treated by a method that is different to the timber on the exterior it must be marked accordingly on at least two opposite components (not every piece). The external timber must be marked on two opposite sides according to the treatment it has been subjected to.

Where an article has been constructed using heat treated wooden bearers as a base and fumigated material as the top component, the base is to be marked on two opposite sides using the HT symbol and the top component must be marked on two opposite sides using the MB code.

Wood packaging material that has been repaired or re-manufactured is subject to the requirements detailed in [Clause 7](#). Mixed marking by different entities is not permitted on such articles.

5 Applying for Certification under the AWPCS

5.1 Eligible applicants

Eligible applicants must be located in Australia, hold an Australian Business Number (ABN) and be:

- treatment providers (either heat treatment, dielectric heating, methyl bromide or sulfuryl fluoride fumigation)

and/or

- wood packaging manufacturers.

5.2 Applications for certification

All applications for certification under the AWPCS must be made to an accredited certification body. A list of certification bodies accredited to assess an applicant's suitability for obtaining certification under the AWPCS is available on the [JAS-ANZ Register](#) or on the [department's website](#).

The selection of a certification body is at the discretion of the applicant. It is the applicant's responsibility to contact the certification body of their choice to confirm all arrangements, including costs, terms and conditions, and availability.

Note: The certification body must require the applicant to complete and submit an application form and enter into a contractual arrangement.

5.3 Submission of a quality manual

Each applicant must submit a quality manual to the certification body for initial assessment. The quality manual must clearly detail the quality systems or procedures the facility has in place to meet the conditions and requirements of the AWPCS.

5.4 Assessment of applications

The requirements that must be met by certification bodies when assessing applications are provided in [Appendix 7 – Requirements for AWPCS Certification Bodies](#).

Applicants that meet the requirements of the AWPCS will be assigned a unique certification number for the facility and/or off-site activity that has been assessed by the department. The certification number forms part of the ISPM 15 certification mark that must be applied to wood packaging produced for export under the AWPCS. Refer to [Clause 4.3](#) regarding ISPM 15 certification marks.

All certified treatment providers and manufacturers of wood packaging material will be listed by the department on the AWPCS Register, located [here](#).

As part of the conditions for certification under the AWPCS, all certified treatment providers and wood packaging manufacturers agree to have their company name, contact details and certification number listed on the AWPCS Register.

Where the application for certification is lodged for a facility that is both a manufacturer and a treatment provider, all requirements documented in the AWPCS that apply to both a treatment provider and a wood packaging manufacturer must be met.

Where an entity has sites in several locations, each individual site will be subject to audit. Each site that meets the requirements of the AWPCS will be allocated a unique certification number and will be listed separately on the AWPCS register.

Where an entity intends to undertake off-site treatment or manufacturing, these procedures will be subject to an audit by the accredited certification body. If the requirements of the AWPCS are met, a unique certification number will be issued for the off-site operations and this will be listed separately on the AWPCS Register.

5.5 Auditing of certified facilities

Frequency of audits

Each certified facility will be subjected to a minimum of two audits in the first year of certification by an accredited certification body. These audits include the initial site audit and at

least one verification audit. The verification audit must be conducted six months after the date of certification in the first year of accreditation. Verification audits must be conducted at approximately six monthly intervals and occur once in each certification body reporting period to the department (see [Appendix 7.3](#)).

Provided the facility has been compliant in the previous audits the verification audit can become annual based on the decision of the certification body. Ongoing certification under the AWPCS is subject to the certified facility successfully passing the annual audit conducted by the certification body. In the event of a non-conformance during audit the facility returns to twice yearly audits until they have achieved two successive audits with zero non-conformities.

Major and minor non-conformities

A list and description of major and minor non-conformities is provided in [Appendix 8](#).

Audits that reveal a major non-conformity will be handled at the discretion of the auditor. The auditor may:

- give the certified entity two weeks to rectify the non-conformity and provide evidence attesting to this
- suspend the entities certification immediately
- prevent the client from selling any product as treated from the date of audit until the non-conformity is rectified.

Audits that reveal three or more minor non-conformities may result in the certified entity having its certification suspended. Situations involving three or more minor non-conformities will be assessed on a case-by-case basis prior to cancelling certification. The auditor may make a decision based on the establishments past performance and the issues surrounding the non-conformities.

Audits that reveal a minor non-conformity will result in a corrective action request being raised by the certification body.

Certified facilities are responsible for ensuring that corrective actions are carried out within a specified time period or face further enforcement actions. The maximum time period to be prescribed for resolving corrective actions is at the discretion of the certification body.

Should the certification status of the entity be suspended, the certified entity must immediately cease applying the ISPM 15 certification mark. Depending on the recommendation of certification body, and final decision by the department, the provider may be directed to destroy all marking devices. The certification body will notify the department of the change in certification status. The department will then record the change of status on the AWPCS Register.

Re-applying for certification

An entity may re-apply for certification once it has completed all corrective actions necessary to prevent a recurrence of the non-conformity(ies) to the satisfaction of the certification body.

The entity must re-submit a quality manual and a detailed report of the corrective actions taken to the certification body.

5.6 Change in certification under the AWPCS

The certified entity must notify the certification body of any changes to the scope of its certification under the AWPCS.

The certified entity must notify, in writing, the relevant certification body of changes to the certified entity's ABN, responsible management personnel or ownership. These major changes may result in cancellation of the certification number and the entity applying for new certification.

A 'Notification of Change in Facility Certification Status Form' ([Appendix 12](#)) must be completed by the certification body and forwarded to the department. The certification number will be suspended and the change in status will be recorded in the AWPCS Register.

Note: Contact details for the Department of Agriculture, Water and the Environment:
Department of Agriculture, Water and the Environment
Grain and Seed Export Program
GPO Box 858
CANBERRA ACT 2601

Or notification may be emailed to the Grain and Seed Export Program at grain.export@awe.gov.au.

When certification has been suspended, all use of the ISPM 15 certification mark must cease immediately.

Note: It is the responsibility of the certified entity to destroy all ISPM 15 certification marking devices.

5.7 Relocation of a certified facility

Relocating a certified facility to a new site may be considered a significant variation to a certified facility's quality system. Any alterations that can affect compliance with the requirements of the AWPCS must be submitted in writing to the company's certification body for approval prior to implementation.

If a certified company relocates an existing certified facility to a new location the following requirements must be met:

- The company must notify their certification body prior to the relocation.
- The company's quality manual must be updated and submitted to their certification body for approval prior to the relocation.
- The new site must be audited prior to the production and/or treatment or on-selling of any wood packaging.

Note: Wood packaging that is produced prior to the new site being audited and verified will not be recognised as being compliant with the ISPM 15 standard.

5.8 Changing certification bodies

The following notification procedures must apply should a certified entity change certification bodies:

- The certification body that is currently servicing the certified entity must advise the department in writing of the certified entities' intention to change service providers.
- The certified entity is to provide written confirmation to the department that they have changed certification bodies and provide the name of the certification body that will be providing certification services.
- The certification body to which the certified facility has transferred to must notify the department in writing confirming that future certification services will be provided to the certified entity.

6 Re-use of Previously Certified Wood Packaging Material

6.1 Re-use of wood packaging material

All wood packaging that bears an ISPM 15 certification mark from Australia or another country and meets the requirements of ISPM 15 may be re-exported from Australia.

Note: If no alterations are made to the unit of wood packaging and it is simply being put back into service without any modifications or repairs, it does NOT need to be retreated and or re-marked.

6.2 Repaired wood packaging material

Repaired wood packaging material is wood packaging material that has had **up to** one third of its original components removed and replaced.

Note: Only entities registered under the AWPCS can repair wood packaging material.

It is not necessary to re-treat the entire wood packaging unit if the original unit is traceable to an official ISPM 15 compliant certification program.

Where the wood packaging unit requiring repair is traceable to an official ISPM 15 compliant certification program, certified entities under AWPCS must ensure that the repaired components of the ISPM 15 compliant wood packaging unit have been appropriately treated (that is, heat treated, treated using dielectric heating or fumigated with methyl bromide or sulfuryl fluoride) to ISPM 15 standards depending on the treatment of the original unit.

The repaired parts must be stamped with Australian ISPM 15 certification mark.

It is not possible to mix components that have been treated differently, in the same article of wood packaging material. If a combination of fumigated, heat treated and dielectric heated components are to be mixed during the repair process, then re-treatment of the entire wood packaging article will be necessary.

Where the wood packaging unit requiring repair is not traceable to an official ISPM 15 compliant certification program the:

- entire unit of wood packaging (including replacement material) must be re-treated
- entire unit of wood packaging (including replacement material) must have all previous ISPM 15 certification marks obliterated/completely removed (for example, by covering with paint or grinding).
- final wood packaging article must display the ISPM 15 certification mark of the repairing facility (certified manufacturer) who carried out the appropriate repair on at least two opposite sides of the unit.

Wood packaging made from 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, are not regulated under ISPM 15 and the above procedures (that is, **up to** one third repaired rule) **DO NOT** apply to the use of processed wood material in the re-manufacture of wood packaging material.

In a packaging unit comprised mainly of processed wood material (for example, plywood), if the total amount of regulated components to be repaired is less than four individual pieces, it is not necessary to re-treat the entire unit. In this case it is only necessary to repair the broken pieces with appropriate ISPM 15 compliant wood.

Note: An entity that repairs wood packaging material and is not registered under the AWPCS, must assure that all ISPM 15 recognised marks are permanently obliterated before use and cannot represent the wood packaging material as ISPM 15 compliant. The use of the ISPM 15 certification mark by those not certified under the AWPCS is an infringement of the *Trade Marks Act 1995 (Cth)* and the *Competition and Consumer Act 2010 (Cth)*.

6.3 Re-manufactured wood packaging material

If a unit of wood packaging material has had **more than** one third of its components replaced, the unit is considered to be re-manufactured.

Re-manufactured wood packaging materials may incorporate new/used components or a combination of new and used components with and without ISPM 15 marks.

Re-manufactured wood packaging material must have any previous application of the ISPM 15 certification mark completely removed. Re-manufactured wood packaging material must be re-treated, and the mark must then be applied anew in accordance with the AWPCS.

The final wood packaging product must display the ISPM 15 certification mark of the manufacturer/repairer that carried out the appropriate repair.

Note: If an entity that is not registered under the AWPCS remanufacturers ISPM 15 compliant wood packaging material, the entity must assure that all ISPM 15 recognised marks are permanently removed before use and cannot re-present the wood packaging material as ISPM 15 compliant. The use of the ISPM 15 certification mark by those not certified under the AWPCS is an infringement of the *Trade Marks Act 1995 (Cth)* and the *Competition and Consumer Act 2010 (Cth)*.

7 Domestic Wood Packaging Material

7.1 Certification of domestic wood packaging material for export

Wood packaging material manufactured for the domestic market may be certified for use in export consignments provided it has been subjected to an approved treatment (that is, fumigation or heat treatment or dielectric heating) by a certified AWPCS treatment provider or constructed by a certified AWPCS wood packaging manufacturer from wood that has been sourced from a certified AWPCS treatment provider.

8 Wood Packaging ‘Kits’

8.1 Production and on-selling of wood packaging ‘kits’

For the purposes of the AWPCS, a wood packaging ‘kit’ is considered to be an unassembled pack comprised of all the necessary components needed to produce a single pallet, box or crate.

Wood packaging ‘kits’ may be stamped with the ISPM 15 certification mark and on-sold to individual/clients only under the following conditions:

- the ‘kits’ are sold by AWPCS certified entities
- the wood packaging ‘kit’ comprises all the components necessary to assemble into a single pallet, box or crate
- the wood packaging ‘kit’ does not comprise of additional components
- at least two components of each ‘kit’ are stamped with the ISPM 15 certification mark and upon assembly the mark is visually obvious on at least two opposite sides of the wood packaging article
- the ‘kits’ are on-sold directly to companies/individuals that will be assembling the kit
- the ‘kit’ is assembled in Australia

- each 'kit' that is on-sold must be either banded together, shrink wrapped or similarly packaged to protect the integrity of the disassembled wood packaging product
- no physical alterations are made to the 'kit' (for example, cutting down pieces).

9 Requirements for Certification under the AWPCS

9.1 Treatment providers

The requirements that a heat treatment provider must meet for certification under the AWPCS are provided in [Appendix 1](#).

The requirements that a dielectric heating provider must meet for certification under the AWPCS are provided in [Appendix 2](#).

The requirements that a fumigator must meet for certification under the AWPCS are provided in [Appendix 3](#) and [Appendix 4](#).

9.2 Wood packaging manufacturers

The requirements that a wood packaging manufacturer (without an on-site treatment facility) must meet for certification under the AWPCS are provided in [Appendix 5](#).

The requirements that a wood packaging manufacturer (with an on-site treatment facility) must meet for certification under the AWPCS are provided in [Appendix 6](#).

9.3 Certification bodies

The requirements that a certification body must meet when certifying and auditing certified facilities under the AWPCS are provided in [Appendix 7](#).

10 Non-conformity

Export shipments containing wood packaging material must meet the phytosanitary requirements of the importing country. The interception of non-conforming wood packaging material, by an importing country, may result in the entire shipment (not just wood packaging material) being destroyed or returned to Australia. Non-conforming material would likely lead to delays in product delivery, treatment or disposal of non-conforming wood packaging, including related costs.

11 Appendices

- [Appendix 1: Requirements for AWPCS heat treatment providers](#)
- [Appendix 2: Requirements for AWPCS dielectric heat treatment providers](#)
- [Appendix 3: Requirements for AWPCS methyl bromide fumigation providers](#)
- [Appendix 4: Requirements for AWPCS sulfuryl fluoride providers](#)
- [Appendix 5: Requirements for wood packaging manufacturers without on-site treatment facility](#)
- [Appendix 6: Requirements for wood packaging manufacturers with on-site treatment facility](#)
- [Appendix 7: Requirements for certification bodies](#)
- [Appendix 8: List and description of non-conformities](#)
- [Appendix 9: Generalised format for treatment certificates](#)
- [Appendix 10: Timber treatment summary](#)
- [Appendix 11: Request for certification number form](#)
- [Appendix 12: Notification of change in facility certification status form](#)

Appendix 1: Requirements for AWPCS Heat Treatment Providers

1.1 Purpose

This section provides details of the requirements that must be met by heat treatment providers for certification under the AWPCS.

1.2 Quality systems and manuals

The treatment provider must have a quality system in place that assures consistent compliance with the requirements of the AWPCS.

Note: The quality system may be one that has been established or recommended by a government authority, regulatory agency, industry, or it may be one developed by the treatment provider.

The heat treatment provider must have in place, and demonstrate compliance with, documented management systems procedures applicable to the treatment facility. The procedures must be reviewed and approved by an accredited AWPCS certification body.

The quality manual must include procedures to address the following:

- segregation of treated and untreated timber, including how the treated wood packaging materials are stored away from any potential sources of infestation
- traceability of treated wood from the treatment stage through to storage and despatch
- application of the ISPM 15 certification mark (if applicable)
- maintaining the security of the ISPM 15 certification mark
- records management
- training provided to staff members responsible for quality control, or involved in the treatment of wood packaging material, to ensure understanding of the requirements of the AWPCS
- procedures for administering the heat treatment that assures that the minimum wood core temperature of 56 degrees Celsius for a minimum duration of 30 continuous minutes is achieved
- procedures for recording temperatures in the heat treatment chamber
- procedures to ensure adequate air flow within the treatment chamber
- location, number and type of temperature sensors and monitoring equipment used in the treatment facility

- mechanisms to detect treatment failure and the appropriate corrective actions that may be applied
- calibration of monitoring or measuring equipment
- procedures for issuing heat treatment certificates
- procedures for identifying batches or lots that have been treated
- tracking of shipments of treated wood or wood packaging material including transfers or sales to other certified facilities such as manufacturers of wood packaging materials
- complaints process that includes:
 - investigation of complaints
 - identification of correction(s) and corrective action(s)
 - records of investigations and actions taken
 - communication with the complainant regarding the outcomes of the investigation.

The quality manual must also include:

- a site plan of the facility
- an organisational structure clearly identifying the person(s) responsible for quality control activities and or for performing activities specific to the AWPCS.

A copy(ies) of the quality manual, or relevant procedures /work instructions, must be available for use by all employees that have a role or perform a function under the AWPCS.

Any alterations, amendments or corrections to the quality system or quality manual that may affect compliance with the requirements of the AWPCS must be submitted in writing to the certification body for approval prior to their implementation. A record of approval must be maintained by the certified facility.

1.3 Segregation of treated and untreated wood packaging

All treated and untreated wood and wood packaging must be segregated to ensure that there is no mixing of treated and untreated lots. Segregation may include a physical barrier between lots, identification marks on lots or a specified separation distance between each lot.

The system of segregation must be able to be verified by the certification body at the time of audit.

1.4 Traceability

A treatment provider's traceability system must allow all treated wood or wood packaging to be traced from the treatment stage through to storage and despatch to clients.

1.5 Prior to treatment

All raw wood or wood packaging material to be treated, must be stacked in a manner that allows adequate air circulation throughout the entire stack or bundle.

For heat treatment, the removal of bark can be carried out before or after treatment.

All operators who administer treatment must have knowledge of the point in the heat treatment chamber or enclosure that receives the lowest heat dose and use this information as a basis for determining the duration and temperature of heating needed to achieve the specified heat treatment regimen.

1.6 Heat treatment dosage

All wood packaging material must be heated in accordance with a specific time-temperature schedule that achieves a minimum wood core temperature of 56 degrees Celsius for a minimum duration of 30 continuous minutes throughout the entire profile of the wood.

Note: It is recognised that there is considerable variation in the way different heat treatment facilities operate. It is the responsibility of the facility to identify the operating conditions that ensure compliance with the heat treatment standard.

If the certification body cannot determine that the operating systems specified in the facility's quality manual will meet the heat treatment standard, the facility may be required to have a laboratory, accredited by the National Association of Testing Authorities (NATA) or equivalent (for example, manufacturer's recommendations, suppliers/manufacturer's authorised service agents), verify that some or all the operating conditions are sufficient for meeting the specified treatment standard of 56 degrees Celsius at the core for a minimum of 30 continuous minutes.

1.7 The treatment chamber

Heat treatment must be carried out in a fully enclosed chamber that is in good working order. The chamber air circulation and operating temperature must be such that the facility can consistently ensure that a minimum temperature of 56 degrees Celsius for a minimum duration of 30 continuous minutes is achieved at the core of each piece of wood or wood packaging material throughout the treated load.

Heat treatment providers must be able to demonstrate that their facilities can consistently deliver treatments to a core temperature of 56 degrees Celsius for a duration of 30 continuous minutes across various species of wood that are treated by the provider.

If a treatment provider cannot demonstrate this then the treatment chamber may need to undergo practical testing to confirm the provider's ability to meet the heat treatment requirement.

The testing must be overseen by an independent suitably qualified person/organisation (such as a representative from a government authority/agency, research institution or appropriate industry association) that can verify the facility's ability to meet this requirement for both hardwood and softwood species.

1.8 Measuring and monitoring equipment

Operators must have access to equipment to accurately monitor and measure the temperature of the treatment chamber. For conventional heat treatment, the core temperature must be measured.

Where operators use the temperature of the treatment chamber during conventional heating to ensure adequate heat treatment, the basis for the minimum time and temperature requirements must be documented and must be from an authoritative source (for example, a federal or state timber research organisation, or the Commonwealth Scientific and Industrial Research Organisation (CSIRO)) and must state any timber thickness and moisture content limitations to the scope of the report.

Please see the link below for generic phytosanitary heat treatment tables. Tables developed by the Canadian Food Inspection Agency.

<http://www.inspection.gc.ca/plants/forestry/exports/ht-program/pi-07/eng/1383841840107/1383841890825>

Measuring instruments used for verifying the process parameters must be calibrated at specified intervals or prior to use, against measurement standards traceable to international or national standards. Traceability means an unbroken chain of calibrations linked to the primary standards of measurement. This is to be demonstrated through the use of calibration facilities that have been accredited by NATA or by an International Laboratory Accreditation Cooperation (ILAC) member body that is a signatory to the ILAC mutual recognition agreement concerning the relevant field of calibration.

1.9 Measuring and monitoring of treatment

All treatment runs must be monitored regularly throughout the duration of the treatment. The treatment duration begins when the temperature and humidity of the chamber has stabilised.

Actual treatment begins when the core temperature of the wood at all points in the stack or bundle has reached 56 degrees Celsius.

Measurement of the heat dosage achieved may be done through the use of electronic probes or dry bulb thermometers with data logging equipment or other monitoring system that ensures effective monitoring of the treatment.

1.10 Treatment certificates

Where treated wood is to be on-sold or transferred to a wood packaging manufacturer, and the treatment provider elects not to apply the ISPM 15 certification mark directly to the treated wood, a treatment certificate must be supplied for each batch or lot of treated timber that is on-sold or transferred to the wood packaging manufacturer.

A generalised format for treatment certificates is provided in [Appendix 9.1](#). As a minimum, treatment certificates should contain the following:

- name of treatment provider as a facility letterhead
- ABN of treatment provider
- type of treatment performed
- date of treatment (or a despatch date for heat treatment certificates only)
- details of treatment, for example, core temperature and duration of treatment
- AWPCS certification number of the heat treatment facility
- description of wood packaging treated, for example, type of packaging or quantity
- details of any distinguishing marks present on wood packaging
- name and signature of a certified facility representative
- date of treatment

Note: A despatch date is allowed to be used in lieu of a treatment date for heat treatment certificates where it can be demonstrated that the specific treatment date of each pack of timber can be ascertained on request.

Note: Electronic signatures are acceptable

The treatment provider must ensure that the process for identifying batches or lots that have been treated and the issuance of treatment certificates is clearly documented in the facility's quality manual.

1.11 Application of ISPM 15 certification mark

Where the treatment provider elects to apply the ISPM 15 certification mark it must be applied to the treated wood or wood packaging material in accordance with [Section 4: The ISPM 15 certification mark](#).

1.12 Records management

The treatment provider must maintain all records relating to the quality system for a minimum period of 2 years. Records must be retained to provide verification that the treatment provider is consistently meeting the requirements of the AWPCS. All documentation must be made available for review by the certification body at the time of audit.

Documentation that must be retained by treatment providers for 2 years includes, but is not limited to:

- a record of the certification number assigned to the facility by the department

- traceability records, retained to a level that allows the fate of all treated wood packaging material to be traced from the treatment stage, right through to storage, and despatch to clients
- treatment records
- calibration records for all equipment as is appropriate to the individual provider and all records of monitoring activities conducted during treatment.

Appendix 2: Requirements for AWPCS Dielectric Heat Treatment providers

2.1 Purpose

Dielectric (microwave) heating is a process that is caused by radiation and is also known as electric heating, radio frequency heating, high-frequency heating and diathermy.

This section provides details of the requirements that must be met by dielectric heat treatment providers for certification under the AWPCS.

2.2 Quality systems and manuals

The treatment provider must have a quality system in place that assures consistent compliance with the requirements of the AWPCS.

Note: The quality system may be one that has been established or recommended by a government authority, regulatory agency, industry, or it may be one developed by the treatment provider.

The dielectric heating provider must have in place, and demonstrate compliance with, documented management systems procedures applicable to the treatment facility. The documented management systems procedures must be reviewed and approved by an accredited AWPCS certification body.

The quality manual must include procedures to address the following:

- segregation of treated and untreated timber, including how the treated wood packaging materials are stored away from any potential sources of infestation.
- traceability of treated wood from the treatment stage through to storage and despatch
- application of the ISPM 15 certification mark (if applicable)
- maintaining the security of the ISPM 15 certification mark
- records management
- training provided to staff members responsible for quality control, or involved in the treatment of wood packaging material, to ensure understanding of the requirements of the AWPCS
- procedures for administering the heat treatment that assures that the minimum wood temperature of 60 degrees Celsius for a minimum duration of one continuous minute is achieved within 30 minutes from the start of the treatment.
- For wood exceeding 5 centimetres in thickness the application of dielectric heating at 2.45 gigahertz requires bidirectional application, or multiple waveguides, for the delivery of microwave energy to ensure uniformity of heating.

- any bark remaining at the time of treatment must be included in the dimension measurements
- procedures for recording temperatures in the heat treatment chamber
- location, number and type of temperature sensors and monitoring equipment used in the treatment facility
- mechanisms to detect treatment failure and the appropriate corrective actions that may be applied
- calibration of monitoring or measuring equipment
- procedures for issuing heat treatment certificates
- procedures for identifying batches or lots that have been treated
- tracking of shipments of treated wood or wood packaging material including transfers or sales to other certified facilities such as manufacturers of wood packaging materials
- complaints process that includes:
 - investigation of complaints
 - identification of correction(s) and corrective action(s)
 - records of investigations and actions taken; and
 - communication with the complainant regarding the outcomes of the investigation.

The quality manual must also include:

- a site plan of the facility
- an organisational structure clearly identifying the person(s) responsible for quality control activities and or for performing activities specific to the AWPCS.

A copy(ies) of the quality manual or relevant procedures and/or work instructions, must be available for use by all employees that have a role or perform a function under the AWPCS.

Any alterations, amendments or corrections to the quality system or quality manual that may affect compliance with the requirements of the AWPCS must be submitted in writing to the certification body for approval prior to their implementation. A record of approval must be maintained by the certified facility.

2.3 Segregation of treated and untreated wood packaging

All treated and untreated wood and wood packaging must be segregated to ensure that there is no mixing of treated and untreated lots. Segregation may include a physical barrier between lots, identification marks on lots or a specified separation distance between each lot.

The system of segregation must be able to be verified by the certification body at the time of audit.

2.4 Traceability

A treatment provider's traceability system must allow all treated wood or wood packaging to be traced from the treatment stage through to storage and despatch to clients.

2.5 Prior to treatment

All raw wood or wood packaging material to be treated, must be stacked in a manner that allows adequate air circulation throughout the entire stack or bundle.

For dielectric heating, the removal of bark can be carried out before or after treatment. Any bark remained at the time of treatment must be included in the dimension measurements.

All operators who administer treatment must have knowledge of the point in the heat treatment chamber or enclosure that receives the lowest heat dose and use this information as a basis for determining the duration and temperature of heating needed to achieve the specified heat treatment regimen.

2.6 Heat treatment dosage

All wood packaging material must be heated in accordance with a specific time-temperature schedule that achieves a minimum temperature of 60 degrees Celsius for a minimum duration of one continuous minute throughout the entire profile of the wood. While using dielectric heating, the service provider must ensure that the target temperature is achieved across the wood profile within 30 minutes of the start of the treatment.

Note: It is recognised that there is considerable variation in the way different heat treatment facilities operate. It is the responsibility of the facility to identify the operating conditions that ensure compliance with the heat treatment standard.

If the certification body cannot determine that the operating systems specified in the facility's quality manual will meet the heat treatment standard, the facility may be required to have a laboratory, accredited by NATA or equivalent (for example, manufacturer's recommendations, suppliers/manufacturer's authorised service agents, and the like), verify that some or all the operating conditions are sufficient for meeting the specified treatment standard of 60 degrees Celsius throughout the entire profile of wood for a minimum of one continuous minute.

2.7 Dielectric heat treatment system

Dielectric heating must be carried out as a batch type or continuous system, as long as 60 degrees Celsius wood profile (including surface) temperature can be achieved within the 30 minutes of the start of the process and can be maintained for the required one minutes.

Heat treatment providers must be able to demonstrate that their facilities can consistently deliver treatments to a wood profile temperature of 60 degrees Celsius for a duration of one

minute across various species of wood that are treated by the provider within 30 minutes of the start of the heating process.

If a treatment provider cannot demonstrate this then the dielectric heating process may need to undergo practical testing to confirm the provider's ability to meet the dielectric heat treatment requirements.

The testing must be overseen by an independent suitably qualified person/organisation (such as a representative from a government authority/agency, research institution or appropriate industry association) that can verify the facility's ability to meet these requirements for both hardwood and softwood species.

2.8 Measuring and monitoring equipment

Operators must have access to equipment to accurately monitor and measure the entire wood profile including surface temperature of the wood or wood packaging material being treated.

Monitoring equipment must be maintained, calibrated and used according to the manufacturer's specifications. A laboratory accredited by NATA or equivalent (for example, manufacturer's recommendations, suppliers/manufacturer's authorised service agents, and the like), must calibrate all monitoring equipment at least annually. Calibration records must be retained for 2 years. Measuring instruments utilised for verifying the process parameters, must be calibrated at specified intervals or prior to use, against measurement standards traceable to international or national standards. Traceability means an unbroken chain of calibrations linked to the primary standards of measurement. This is to be demonstrated through the use of calibration facilities that have been accredited by NATA or by an ILAC member body that is a signatory to the ILAC mutual recognition agreement concerning the relevant field of calibration.

2.9 Measuring and monitoring of treatment

All treatment runs must be monitored regularly throughout the duration of the treatment. The minimum treatment duration of 30 minutes begins as soon as the heating starts. The treatment is monitored at the coldest point, usually the surface, to ensure the minimum temperature is achieved throughout the wood profile.

Actual treatment begins when the wood profile temperature at all points in the stack or bundle has reached 60 degrees Celsius.

Measurement of the heat dosage achieved may be done through the use of electronic probes or dry bulb thermometers with data logging equipment or other monitoring system that ensures effective monitoring of the treatment.

2.10 Treatment certificates

Where treated wood is to be on-sold or transferred to a wood packaging manufacturer, and the treatment provider elects not to apply the ISPM 15 certification mark directly to the treated wood, a treatment certificate must be supplied for each batch or lot of treated timber that is on-sold or transferred to the wood packaging manufacturer.

A generalised format for treatment certificates is provided in [Appendix 9.2](#). As a minimum, treatment certificates should contain the following:

- name of treatment provider as a facility letterhead
- ABN of treatment provider
- type of treatment performed
- date of treatment (or a despatch date for heat treatment certificates only)
- details of treatment, for example, core temperature and duration of treatment
- AWPCS certification number of the heat treatment facility
- description of wood packaging treated, for example, type of packaging or quantity
- details of any distinguishing marks present on wood packaging
- name and signature of a certified facility representative
- date of treatment.

Note: A despatch date is allowed to be used in lieu of a treatment date for heat treatment certificates where it can be demonstrated that the specific treatment date of each pack of timber can be ascertained on request.

Note: Electronic signatures are acceptable

The treatment provider must ensure that the process for identifying batches or lots that have been treated and the issuance of treatment certificates is clearly documented in the facility's quality manual.

2.11 Application of ISPM 15 certification mark

Where the treatment provider elects to apply the ISPM 15 certification mark it must be applied to the treated wood or wood packaging material in accordance with [Section 4: The ISPM 15 certification mark](#).

2.12 Records management

The treatment provider must maintain all records relating to the quality system for a minimum period of 2 years. Records must be retained to provide verification that the treatment provider is consistently meeting the requirements of the AWPCS. All documentation must be made available for review by the certification body at the time of audit.

Documentation that must be retained by treatment providers for 2 years includes but is not limited to:

- a record of the certification number assigned to the facility by the department

- traceability records, retained to a level that allows the fate of all treated wood packaging material to be traced from the treatment stage, right through to storage, and despatch to clients
- treatment records
- calibration records for all equipment as is appropriate to the individual provider and all records of monitoring activities conducted during treatment.

Appendix 3: Requirements for AWPCS methyl bromide fumigation providers

3.1 Purpose

This section provides details of the requirements that must be met by methyl bromide fumigators for certification under the AWPCS.

These requirements may be additional to those required generally for fumigators conducting methyl bromide in Australia, such as safety procedures, notifications, training and licensing.

Note: It is recommended that measures be taken to reduce or eliminate emissions of methyl bromide to the atmosphere where technically and economically feasible.

3.2 Quality systems and manuals

The fumigation treatment provider must have a quality system in place that assures consistent compliance with the requirements of the AWPCS.

Note: The quality system may be one that has been established or recommended by a government authority, regulatory agency, industry, or it may be one developed by the fumigation provider.

The fumigation treatment provider must have in place, and demonstrate compliance with, documented management systems procedures applicable to the treatment facility. The procedures must be reviewed and approved by an accredited AWPCS certification body.

The quality manual must include procedures to address the following:

- segregation of treated and untreated timber including how the treated wood packaging materials are stored away from any potential sources of infestation.
- traceability of treated wood from the treatment stage through to storage and despatch
- application of the ISPM 15 certification mark (if applicable)
- maintaining the security of the ISPM 15 certification mark
- records management
- the training provided to staff members responsible for quality control or involved in the treatment of wood packaging material to ensure understanding of the requirements of the AWPCS
- procedures for administering the fumigant including temperature control, airflow within the treatment chamber and maintenance of correct fumigant concentrations
- procedures for recording and reporting methyl bromide usage

- monitoring activities undertaken during treatment
- mechanisms to detect treatment failure and the appropriate corrective actions that may be applied
- calibration of monitoring or measuring equipment
- procedures for issuing fumigation certificates
- procedures for identifying batches or lots that have been treated
- tracking of shipments of treated wood or wood packaging material including transfers or sales to other certified facilities such as manufacturers of wood packaging materials
- complaints process that includes:
 - investigation of complaints
 - identification of correction(s) and corrective action(s)
 - records of investigations and actions taken
 - communication with the complainant regarding the outcomes of the investigation.

The quality manual must also include:

- a site plan of the facility (where applicable)
- an organisational structure clearly identifying the person(s) responsible for quality control activities and or for performing activities specific to the AWPCS.

A copy(ies) of the quality manual, or relevant procedures and/or work instructions, must be available for use by all employees that have a role or perform a function under the AWPCS.

Any alterations, amendments or corrections to the quality system or quality manual that may affect compliance with the requirements of the AWPCS must be submitted in writing to the certification body for approval prior to their implementation. A record of approval must be maintained by the certified facility.

3.3 Segregation of treated and untreated wood packaging

All treated and untreated wood and wood packaging must be segregated to ensure that there is no mixing of treated and untreated lots. Segregation may include a physical barrier between lots, identification marks on lots or a specified separation distance between each lot.

The system of segregation must be able to be verified by the certification body at the time of audit.

3.4 Traceability

A fumigation provider's traceability system must allow all treated timber or wood packaging to be traced from the treatment stage through to storage and despatch to clients.

3.5 Prior to fumigation

The following conditions must be met prior to the commencement of any fumigation treatment:

- individual planks, rounds or articles must have at least one physical dimension that is less than 200 millimetres thick
- the wood material in each bundle or stack is vertically separated every 200 millimetres
- there is adequate physical distance (at least 50 millimetres) between the wood packaging material and both the base and roof of the fumigation enclosure
- bark is removed as per [Section 4.5: Use of debarked wood](#)
- the commodity to be treated must have a minimum temperature of 10 degrees Celsius (including at the wood core) throughout the duration of the treatment.

Note: Fumigation carried out in the open, with high prevailing wind speeds is unlikely to be successful and may also be unsafe.

3.6 Temperature and fumigation dosage rates

The use of methyl bromide should take into account the CPM Recommendation *Replacement or reduction of the use of methyl bromide as a phytosanitary measure* (2008). NPPOs are encouraged to promote the use of alternative treatments approved in this standard¹.

The wood packaging material must be fumigated with methyl bromide in accordance with a schedule that achieves the minimum concentration-time product² (CT) over 24 hours at the temperature and final residual concentration specified in Table 1. This CT must be achieved throughout the wood, including at its core, although the concentrations would be measured in the ambient atmosphere. Monitoring of gas concentrations must be carried out at a minimum at 2, 4, 12 and 24 hours (in the case of longer exposure times and weaker concentrations, additional measurement should be recorded at the end of fumigation).

¹ In addition, contracting parties to the IPPC may also have obligations under the Montreal Protocol on Substances that deplete the Ozone Layer.

² The CT product utilised for methyl bromide treatment in this standard is the sum of the product of the concentration (g/m³) and time (h) over the duration of the treatment.

Table 1: Minimum CT over 24 hours for wood packaging material fumigated with methyl bromide

Temperature	CT (g·h/m ³) over 24 h	Minimum final concentration (g/m ³) after 24 h
21 degrees Celsius or above	650	24
16 degrees Celsius or above	800	28
10 degrees Celsius or above	900	32

One example of a treatment schedule that achieves the minimum required CT for wood packaging material treated with methyl bromide (initial doses may need to be higher in conditions of high absorption or leakage) is shown in Table 2.

Table 2: Minimum Methyl Bromide Fumigation Standard

Ambient Temperature	Dosage (g/m ³)	Minimum concentration (g/m ³) at:			
		2hrs	4hrs	12hrs	24hrs
21 degrees Celsius or above	48	36	31	28	24
16 degrees Celsius or above	56	42	36	32	28
10 degrees Celsius or above	64	48	42	36	32

When ambient temperatures are below 10 degrees Celsius, some form of artificial heating may be used to raise the temperature to a satisfactory level prior to fumigation. Further heating may be required during the exposure period to maintain adequate commodity temperatures.

Calculation of methyl bromide dosages must be based on the expected minimum ambient temperature within the enclosure during the fumigation period. For fumigations in containers, or under sheets under cover, commodity temperatures should be measured. For fumigation outside under sheets, minimum ambient temperatures may be used as an estimate of minimum commodity temperatures.

The simplest way to obtain the expected minimum temperature is from a daily weather forecast, such as those provided on the Australian Government Bureau of Meteorology website (www.bom.gov.au), or through the local newspaper or television news program. No further calculations are required on this value.

Example: The minimum expected temperature for the treatment day is 9 degrees Celsius. The fumigation treatment provider would use artificial heating to raise the temperature to a minimum of 10 degrees Celsius. Then conduct the fumigation at the minimum concentration that would be 36 grams per cubic metre for 12 continuous hours.

For fumigations carried out overnight, the operator must determine the average minimum ambient temperature expected for the duration of the treatment (the treatment spans over two

weather forecast periods). As a result, the average minimum temperature must be estimated for the treatment period as based on the two forecasts. This is done by adding together the minimum temperature forecast for each day and then dividing by two.

Fumigation treatment providers should note that the average minimum temperature is not an average of the daily maximum and minimum temperatures. This gives the average daily temperature.

3.7 The fumigation enclosure

Fumigation treatments must be carried out in well-ventilated and sheltered areas.

Treatments must either be carried out in gastight chambers, freight containers or under sheets, forming a well-sealed enclosure.

3.8 Chamber and container fumigation

The gas tightness of all containers and fumigation chambers used to fumigate wood packaging material must be verified prior to any fumigation commencing, by means of a pressure decay test. Containers or chambers that cannot achieve a pressure decay value of 200 to 100 pascals, for 10 seconds or more, are not considered to be gastight.

Where it cannot be demonstrated that the fumigation chamber or container is gastight, the chamber or container must be sheeted with gastight fumigation sheets.

The floor of any fumigation enclosure must be impervious to gas so that the minimum fumigant concentration can be maintained for the duration of the treatment.

3.9 Sheet fumigation

All fumigation sheets must be:

- free from any defects
- have a permeability of less than 0.02 grams of methyl bromide per day, per square metre.

Documented evidence of the sheet permeability, such as a manufacturer's declaration, must be available for all sheets purchased after certification under the AWPCS.

Prior to commencement of any treatment the treatment provider must ensure:

- a gastight seal exists between the sheets and the floor
- corners where ropes, cords or sampling lines emerge from between or under the sheets are tightly sealed
- loose sheets on corners of stacks are secured
- sheets are positioned to avoid any sharp corners or objects that might damage the sheets

- sheets are arranged so that there is at least 50 centimetres of sheeting extending beyond the limit of the seal
- chains or timber are not to be used for sealing sheets to the floor.

Fumigation must only be performed on intact concrete or asphalt surfaces. The surface must be flat, free of cracks, drains or any other openings.

3.10 Calculation of fumigation enclosure volume

For the purposes of fumigation, the volume is the total space contained within the fumigation enclosure.

Where an enclosed chamber is used for fumigation, the volume of any gas circulation equipment external to the chamber must also be included in the calculation of enclosure volume.

3.11 Supply and sampling lines

All enclosures

All sampling lines must be distinguishable from each other and placed away from supply line outlets (where supply lines are left in the stack).

Single containers used as fumigation enclosures

Supply lines must be positioned to ensure the added fumigant is retained efficiently within the enclosure and to aid dispersal of the fumigant throughout the entire enclosure. Following the introduction of the gas, the supply lines in the container must be sealed to prevent leakage.

Sampling lines must be placed at the top and centre of the fumigation enclosure and at the front base and centre of the material being fumigated. Where this is not feasible the operator must document an equivalent alternative procedure.

Multiple containers (including open top containers)

Where multiple containers are used as fumigation enclosures and are fumigated under the same sheets in a single stack, the containers are to be treated as detailed in Table 3.

Table 3. Number of Sampling Lines by Container

Number of Containers	Number Sampling Lines	Placement
3 or less	A minimum of 3 in the enclosure with at least 1 in each container	Top centre and elsewhere as required
Greater than 3	A minimum of 1 line per container	Top centre

Where a sampling line cannot be placed in the positions indicated above, the operator must document an equivalent alternative procedure.

Non-containerised

For non-containerised treatments, a minimum of three sampling lines should be positioned within the enclosure equivalent to the front base, back and centre of the wood packaging material being fumigated.

3.12 Delivery of the fumigant

A vaporiser or volatiliser must be used to deliver the fumigant. Necessary measures to ensure effective dispersal within the fumigation enclosure must be in place, such as the use of fans.

Small enclosures, such as shipping containers, must have at least one axial fan with a minimum airflow of 70 cubic metres per minute (2500 Cubic Foot per Minute CFM)).

Larger enclosures must have at least two axial fans.

3.13 Measuring and monitoring equipment

Equipment should be capable of monitoring methyl bromide concentrations within the fumigation enclosure within the range of 2–100 grams per cubic metre for measurement of the fumigant.

Equipment used for monitoring fumigant in hazard areas and post treatment clearance of the enclosure should be capable of detecting concentrations of fumigants of between 2–100 parts per million.

Monitoring equipment must be maintained, calibrated and used according to the manufacturer's specifications. A laboratory accredited by NATA or equivalent (for example, manufacturer's recommendations, suppliers/manufacturer's authorised service agents, etc.) must calibrate all monitoring equipment at least annually. Calibration records must be retained for two years.

Measuring instruments utilised for verifying the process parameters must be calibrated at specified intervals or prior to use, against measurement standards traceable to international or national standards. Traceability means an unbroken chain of calibrations linked to the primary standards of measurement. This is to be demonstrated through the use of calibration facilities that have been accredited by NATA or by an ILAC member body that is a signatory to the ILAC mutual recognition agreement concerning the relevant field of calibration.

Where equipment cannot be calibrated it must be used according to the manufacturer's specifications, kept in good working order and replaced as necessary.

3.14 Measuring and monitoring of fumigant levels

Option 1 – Initial and endpoint monitoring with top-up option at the end

Fumigant concentrations must be monitored at two specific times during the treatment.

Initial monitoring of the fumigant concentration must occur 30–60 minutes after treatment has commenced. Final monitoring must be done at the end of the treatment but not longer than one hour before the scheduled fumigation ends.

Measurements from all sampling lines should be within + or – 15 per cent of each other at the set monitoring times. Where this is not achieved at the initial monitoring time, the treatment must be extended or action taken to resolve the problem.

If the top-up option is required, it must be performed as stated in *Option 2*.

Option 2 – Continuous monitoring – with top-up option

The fumigant concentrations must either be measured at specific times during the fumigation period or monitored at intervals not greater than six hours apart throughout the fumigation.

The top-up option may be used if the concentration falls below or is likely to fall below the minimum concentration. If this option is taken, then the fumigation treatment must be extended for an additional four hours. Only one top-up per treatment is permitted.

The methyl bromide concentration at the end of the treatment must be in accordance with the minimum concentrations listed in Tables 1 and 2. If the final reading is below the minimum concentration listed in Tables 1 and 2 then the fumigation has failed.

3.15 Treatment certificates

Where the treated wood is to be on-sold or transferred to a wood packaging manufacturer, and the fumigation provider elects not to apply the ISPM 15 certification mark directly to the treated wood, a treatment certificate must be supplied for each batch or lot of treated timber that is on-sold or transferred to the wood packaging manufacturer.

A generalised format for treatment certificates is provided in [Appendix 9.3](#). As a minimum treatment certificates should contain the following:

- name of fumigation provider as a facility letterhead
- ABN of fumigation provider
- type of treatment performed, for example, fumigation with methyl bromide
- method of fumigation for example, fumigation under gas tight sheets
- date of treatment
- details of treatment for example, dosage, minimum ambient temperature during fumigation or duration of treatment
- certification number of fumigation provider
- description of wood packaging treated, for example, type of packaging or quantity
- details of any distinguishing marks present on wood packaging

- name and signature of a certified facility representative
- date of treatment.

Note: Electronic signatures are acceptable

The treatment provider must ensure that the process for identifying batches or lots that have been treated and the issuance of treatment certificates is clearly documented in the facility's quality manual.

3.16 Application of the ISPM 15 certification mark

Where the fumigation provider elects to apply the ISPM 15 certification mark it must be applied to the treated wood or wood packaging material in accordance with [Section 4: The ISPM 15 certification mark](#).

3.17 Records management

The fumigation provider must maintain all records relating to the quality system for a minimum period of two years. Records must be retained to provide verification that the fumigation provider is consistently meeting the requirements of the AWPCS. All documentation must be made available for review by the certification body at the time of audit.

Documentation that must be retained for two years by fumigation provider includes but is not limited to:

- a record of the certification number assigned to the facility by the department
- traceability records, retained to a level that allows the fate of all treated wood packaging material to be traced from the treatment stage, right through to storage, and despatch to clients
- treatment records
- calibration records for all equipment as is appropriate to the individual provider and all records of monitoring activities conducted during treatment.

3.18 Certification requirements for off-site fumigation treatment – mobile treatment providers

Treatment providers that operate from a fixed site and intend to travel to other sites to treat wood packaging material must obtain a second certification number for the off-site treatment activities.

Compliance with all requirements that apply to treatment providers including procedures for managing the security of devices used to apply the ISPM 15 certification mark must be demonstrated.

Compliance must be verified through audit by an accredited certification body during an off-site treatment before a certification number for any off-site activity will be issued.

Company procedures for administering treatment off-site must be documented in the provider's quality manual and may be included as an additional schedule.

All wood packaging material that is treated at an off-site location must bear the ISPM 15 certification mark issued for the off-site operation.

Appendix 4: Requirements for AWPCS sulfuryl fluoride fumigation providers

4.1 Purpose

This section provides details of the requirements that must be met by sulfuryl fluoride fumigators for certification under the AWPCS.

These requirements may be additional to those required generally for fumigators conducting sulfuryl fluoride in Australia, such as safety procedures, notifications, training and licensing.

4.2 Quality systems and manuals

The fumigation treatment provider must have a quality system in place that assures consistent compliance with the requirements of the AWPCS.

Note: The quality system may be one that has been established or recommended by a government authority, regulatory agency, industry, or it may be one developed by the fumigation provider.

The fumigation treatment provider must have in place, and demonstrate compliance with, documented management systems procedures applicable to the treatment facility. The procedures must be reviewed and approved by an accredited AWPCS certification body.

The quality manual must include procedures to address the following:

- segregation of treated and untreated timber including how the treated wood packaging materials are stored away from any potential sources of infestation.
- traceability of treated wood from the treatment stage through to storage and despatch
- application of the ISPM 15 certification mark (if applicable)
- maintaining the security of the ISPM 15 certification mark
- records management
- the training provided to staff members responsible for quality control or involved in the treatment of wood packaging material to ensure understanding of the requirements of the AWPCS
- procedures for administering the fumigant including temperature control, airflow within the treatment chamber and maintenance of correct fumigant concentrations
- procedures for recording and reporting sulfuryl fluoride usage
- monitoring activities undertaken during treatment

- mechanisms to detect treatment failure and the appropriate corrective actions that may be applied
- calibration of monitoring or measuring equipment
- procedures for issuing fumigation certificates
- procedures for identifying batches or lots that have been treated
- tracking of shipments of treated wood or wood packaging material including transfers or sales to other certified facilities such as manufacturers of wood packaging materials
- complaints process that includes:
 - investigation of complaints
 - identification of correction(s) and corrective action(s)
 - records of investigations and actions taken, and
 - communication with the complainant regarding the outcomes of the investigation.

The quality manual must also include:

- a site plan of the facility (where applicable)
- an organisational structure clearly identifying the person(s) responsible for quality control activities and or for performing activities specific to the AWPCS.

A copy(ies) of the quality manual or relevant procedures and/or work instructions must be available for use by all employees that have a role or perform a function under the AWPCS.

Any alterations, amendments or corrections to the quality system or quality manual that may affect compliance with the requirements of the AWPCS must be submitted in writing to the certification body for approval prior to their implementation. A record of approval must be maintained by the certified facility.

4.3 Segregation of treated and untreated wood packaging

All treated and untreated wood and wood packaging must be segregated to ensure that there is no mixing of treated and untreated lots. Segregation may include a physical barrier between lots, identification marks on lots or a specified separation distance between each lot.

The system of segregation must be able to be verified by the certification body at the time of audit.

4.4 Traceability

A fumigation provider's traceability system must allow all treated timber or wood packaging to be traced from the treatment stage through to storage and despatch to clients.

4.5 Prior to fumigation

The following conditions must be met prior to the commencement of any fumigation treatment:

- individual planks, rounds or articles must have at least one physical dimension that is less than 200 millimetres thick
- the wood material in each bundle or stack is vertically separated every 200 millimetres
- there is adequate physical distance (at least 50 millimetres) between the wood packaging material and both the base and roof of the fumigation enclosure
- bark is removed as per [Section 4.5: Use of debarked wood](#)
- the lowest measured temperature of the product or ambient air is used to calculate the sulphuryl fluoride dosage
- the temperature of the product must be at least 20 degrees Celsius (including at the wood core) throughout the treatment
- wood packaging with a moisture content of higher than 75 per cent (dry basis) must not be treated with sulfuryl fluoride
- fumigation enclosure is loaded up to a maximum of 80 per cent of its capacity
- fans may be used to ensure uniform gas distribution across the fumigation chamber and achieve an equilibrium
- wood packaging must not be wrapped or coated with materials impervious to sulfuryl fluoride
- fumigation floor must be impervious to fumigant gas or gas-proof sheets are laid on the floor
- when calculating sulfuryl fluoride dosage, compensation is made for any gas mixture (for example, carbon dioxide) to ensure that the total amount of pure fumigant is applied to meet the ISPM 15 requirements.

Note: Fumigation carried out in the open, with high prevailing wind speeds is unlikely to be successful and may also be unsafe.

4.6 Temperature and fumigation dosage rates

The wood packaging material must be fumigated with sulfuryl fluoride in accordance with a schedule that achieves the minimum concentration-time product³ (CT) over 24 or 48 hours at

³ The CT product utilised for sulfuryl fluoride treatment in this standard is the sum of the product of the concentration (g.h/m³) and time (h) over the duration of the treatment.

the temperature and final residual concentration specified in Table 1. This CT must be achieved throughout the wood, including at its core, although the concentrations would be measured in the ambient atmosphere. Monitoring of gas concentrations must be carried out at a minimum at 2, 4, 12, 24 and 48 hours (in the case of longer exposure times and weaker concentrations, additional measurement should be recorded at the end of fumigation).

Table 1: Minimum CT over 24 or 48 hours for wood packaging material fumigated with Sulfuryl Fluoride

Temperature	CT (g·h/m ³)	Minimum final concentration (g/m ³)
30 degrees Celsius or above for 24 hours	1400	41
20 degrees Celsius or above for 48 hours	3000	29

One example of a treatment schedule that achieves the minimum required CT for wood packaging material treated with sulfuryl fluoride (initial doses may need to be higher in conditions of high absorption or leakage) is shown in Table 2.

Table 2: Minimum Sulfuryl Fluoride Fumigation Standard

Ambient Temperature	Minimum required CT (g·h/m ³)	Dosage (g/m ³)	Minimum concentration (g/m ³) at:				
			0.5hrs	2 hrs	4hrs	24hrs	48hrs
30 degrees Celsius or above	1400	82	87	78	73	41	n/a
20 degrees Celsius or above	3000	120	124	112	104	58	29

When ambient temperatures are below minimum some form of artificial heating may be used to raise the temperature to a satisfactory level prior to fumigation. Further heating may be required during the exposure period to maintain adequate commodity temperatures.

Calculation of sulfuryl fluoride dosages must be based on the expected minimum ambient temperature or product temperature, whichever is lower, within the enclosure during the fumigation period. For fumigations in containers, or under sheets under cover, commodity temperatures should be measured. For fumigation outside under sheets, minimum ambient temperatures may be used as an estimate of minimum commodity temperatures.

The simplest way to obtain the expected minimum temperature is from a daily weather forecast, such as those provided on the Australian Government Bureau of Meteorology website

(www.bom.gov.au), or through the local newspaper or television news program. No further calculations are required on this value.

For fumigations carried out overnight, the operator must determine the average minimum ambient temperature expected for the duration of the treatment (the treatment spans over two weather forecast periods). As a result, the average minimum temperature must be estimated for the treatment period as based on the two forecasts. This is done by adding together the minimum temperature forecast for each day and then dividing by two.

Fumigation treatment providers should note that the average minimum temperature is not an average of the daily maximum and minimum temperatures. This gives the average daily temperature.

4.7 The fumigation enclosure

Fumigation treatments must be carried out in well-ventilated and sheltered areas.

Treatments must either be carried out in gastight chambers, freight containers or under sheets, forming a well-sealed enclosure.

4.8 Chamber and container fumigation

The gas tightness of all containers and fumigation chambers used to fumigate wood packaging material must be verified prior to any fumigation commencing, by means of a pressure decay test. Containers or chambers that cannot achieve a pressure decay value, 200 to 100 pascals, of 10 seconds or more are not considered to be gastight.

Where it cannot be demonstrated that the fumigation chamber or container is gastight, the chamber or container must be sheeted with gastight fumigation sheets.

The floor of any fumigation enclosure must be impervious to gas so that the minimum fumigant concentration can be maintained for the duration of the treatment.

4.9 Sheet fumigation

All fumigation sheets must be:

- free from any defects
- have a permeability of less than 0.02 grams of sulfuryl fluoride per day, per square metre.

Documented evidence of the sheet permeability such as a manufacturer's declaration must be available for all sheets purchased after certification under the AWPCS.

Prior to commencement of any treatment the treatment provider must ensure:

- a gastight seal exists between the sheets and the floor
- corners where ropes, cords or sampling lines emerge from between or under the sheets are tightly sealed

- loose sheets on corners of stacks are secured
- sheets are positioned to avoid any sharp corners or objects that might damage the sheets
- sheets are arranged so that there is at least 50 centimetres of sheeting extending beyond the limit of the seal
- chains or timber are not to be used for sealing sheets to the floor
- for tarpaulin fumigation, use a tarp of highly resistant material such as vinyl coated nylon, or polyethylene sheeting of at least 0.15 millimetres (150 microns) thickness. All seams are to be sealed to create a gas-tight enclosure. Low edges of the tarp are to be weighted down, for example with sand
- for sulfuryl fluoride, a fumigant of low water solubility, ground surrounding the structure is moistened with water to act as a barrier to the gas

Fumigation must only be performed on intact concrete or asphalt surfaces. The surface must be flat, free of cracks, drains or any other openings.

4.10 Calculation of fumigation enclosure volume

For the purposes of fumigation, the volume is the total space contained within the fumigation enclosure.

Where an enclosed chamber is used for fumigation the volume of any gas circulation equipment external to the chamber must also be included in the calculation of enclosure volume.

4.11 Supply and sampling lines

All enclosures

All sampling lines must be distinguishable from each other and placed away from supply line outlets (where supply lines are left in the stack).

Single containers used as fumigation enclosures

Supply lines must be positioned to ensure the added fumigant is retained efficiently within the enclosure and to aid dispersal of the fumigant throughout the entire enclosure. Following the introduction of the gas, the supply lines in the container must be sealed to prevent leakage.

Sampling lines must be placed at the top and centre of the fumigation enclosure and at the front base and centre of the material being fumigated. Where this is not feasible the operator must document an equivalent alternative procedure.

Multiple containers (including open top containers)

Where multiple containers are used as fumigation enclosures and are fumigated under the same sheets in a single stack, the containers are to be treated as detailed in Table 3.

Table 3. Number of Sampling Lines by Container

Number of Containers	Number Sampling Lines	Placement
3 or less	A minimum of 3 in the enclosure with at least 1 in each container	Top centre and elsewhere as required
Greater than 3	A minimum of 1 line per container	Top centre

Where a sampling line cannot be placed in the positions indicated above the operator must document an equivalent alternative procedure.

Non-containerised

For non-containerised treatments, a minimum of three sampling lines should be positioned within the enclosure equivalent to the front base, back and centre of the wood packaging material being fumigated.

4.12 Delivery of the fumigant

Fans are used as appropriate during the gas distribution phase of fumigation to ensure equilibrium is reached, and they are positioned to ensure the fumigant is rapidly and effectively distributed throughout the fumigation enclosure (preferably within the first hour of application).

Small enclosures, such as shipping containers, must have at least one axial fan with a minimum of 70 cubic metres per minute (2500 cubic feet per minute).

Larger enclosures must have at least two axial fans.

4.13 Measuring and monitoring equipment

Equipment should be capable of monitoring sulfuryl fluoride concentrations within the fumigation enclosure within the range of <1–100 grams per cubic metre for measurement of the fumigant.

Equipment used for monitoring fumigant in hazard areas and post treatment clearance of the enclosure should be capable of detecting concentrations of fumigants of between <1–100 parts per million.

Monitoring equipment must be maintained, calibrated and used according to the manufacturer's specifications. Monitoring equipment may be calibrated and maintained by a laboratory accredited by NATA or equivalent or be approved by the manufacturer. Calibration records must be retained for two years.

Temperature and gas concentration sensors and data recording equipment are to be calibrated in accordance with the manufacturer's instructions and must be calibrated at specified intervals or prior to use, against measurement standards traceable to international or national standards. Traceability means an unbroken chain of calibrations linked to the primary standards of measurement. This is to be demonstrated through the use of calibration facilities

that have been accredited by NATA or by an ILAC member body that is a signatory to the ILAC mutual recognition agreement concerning the relevant field of calibration.

Where equipment cannot be calibrated or has the ability for self-calibration, it must be used according to the manufacturer's specifications, kept in good working order, and be replaced as necessary.

4.14 Measuring and monitoring of fumigant levels

Option 1 – Initial and endpoint monitoring with top-up option at the end

Fumigant concentrations must be monitored at two specific times during the treatment.

Initial monitoring of the fumigant concentration must occur 30–60 minutes after treatment has commenced. Final monitoring must be done at the end of the treatment but not longer than one hour before the scheduled fumigation ends.

Measurements from all sampling lines should be within + or – 15 per cent of each other at the set monitoring times. Where this is not achieved at the initial monitoring time, the treatment must be extended or action taken to resolve the problem.

If the top-up option is required, it must be performed as stated in *Option 2*.

Option 2 – Continuous monitoring – with top-up option

The fumigant concentrations must either be measured at specific times during the fumigation period or monitored at intervals not greater than six hours apart throughout the fumigation.

The top-up option may be used if the concentration falls below or is likely to fall below the minimum concentration. If this option is taken, then the fumigation treatment must be extended for an additional four hours. Only one top-up per treatment is permitted.

The sulfuryl fluoride concentration at the end of the treatment must be in accordance with the minimum concentrations listed in Tables 1 and 2. If the final reading is below the minimum concentration listed in Tables 1 and 2 then the fumigation has failed.

4.15 Treatment certificates

Where the treated wood is to be on-sold or transferred to a wood packaging manufacturer, and the fumigation provider elects not to apply the ISPM 15 certification mark directly to the treated wood, a treatment certificate must be supplied for each batch or lot of treated timber that is on-sold or transferred to the wood packaging manufacturer.

A generalised format for treatment certificates is provided in. As a minimum treatment certificates should contain the following:

- name of fumigation provider
- ABN of fumigation provider

- type of treatment performed, for example, fumigation with methyl bromide
- method of fumigation for example, fumigation under gas tight sheets
- date of treatment
- details of treatment for example, dosage, minimum ambient temperature during fumigation or duration of treatment
- AWPCS certification number of fumigation provider
- description of wood packaging treated, for example, type of packaging or quantity
- details of any distinguishing marks present on wood packaging
- name and signature of a certified facility representative.

Note: Electronic signatures are acceptable 15 certification mark

Where the fumigation provider elects to apply the ISPM 15 certification mark it must be applied to the treated wood or wood packaging material in accordance with [Section 4: The ISPM 15 certification mark](#).

4.16 Records management

The fumigation provider must maintain all records relating to the quality system for a minimum period of two years. Records must be retained to provide verification that the fumigation provider is consistently meeting the requirements of the AWPCS. All documentation must be made available for review by the certification body at the time of audit.

Documentation that must be retained for two years by fumigation provider includes but is not limited to:

- a record of the AWPCS certification number assigned to the facility by the department
- traceability records, retained to a level that allows the fate of all treated wood packaging material to be traced from the treatment stage, right through to storage, and despatch to clients
- treatment records
- calibration records for all equipment as is appropriate to the individual provider and all records of monitoring activities conducted during treatment.

4.17 Certification requirements for off-site fumigation treatment – mobile treatment providers

Treatment providers that operate from a fixed site and intend to travel to other sites to treat wood packaging material must obtain a second certification number for the off-site treatment activities.

Compliance with all requirements that apply to treatment providers including procedures for managing the security of devices used to apply the ISPM 15 certification mark must be demonstrated.

Compliance must be verified through audit by an accredited certification body during an off-site treatment before a certification number for any off-site activity will be issued.

Company procedures for administering treatment off-site must be documented in the provider's quality manual and may be included as an additional schedule.

All wood packaging material that is treated at an off-site location must bear the ISPM 15 certification mark issued for the off-site operation.

Appendix 5: Requirements for wood packaging manufacturers without on-site treatment facilities

5.1 Purpose

This section provides details of the requirements that must be met by wood packaging manufacturers (without on-site treatment facilities) for certification under the AWPCS.

5.2 Quality systems and manuals

The wood packaging manufacturer must have a quality system in place that assures consistent compliance with the requirements of the AWPCS.

Note: The quality system may be one that has been established or recommended by a government authority, regulatory agency, industry, or it may be one developed by the manufacturer.

The wood packaging manufacturer must have in place, and demonstrate compliance with, documented management systems procedures applicable to the manufacturing facility. The procedures must be reviewed and approved by an accredited AWPCS certification body.

The quality system must include procedures to address the following:

- sourcing treated timber from a certified treatment facility
- segregation of treated and untreated timber including how the treated wood packaging materials are stored away from any potential sources of infestation.
- traceability of treated wood from receipt through to manufacture, storage and despatch
- application of the ISPM 15 certification mark
- maintaining the security of the ISPM 15 certification mark
- manufacturing off-site
- records management
- the training provided to staff members responsible for quality control or involved in the manufacture of wood packaging material to ensure understanding of requirements of the AWPCS
- complaints process that includes:
 - investigation of complaints
 - identification of correction(s) and corrective action(s)
 - records of investigations and actions taken, and

- communication with the complainant regarding the outcomes of the investigation.

The quality manual must also include:

- a site plan of the facility (where applicable)
- an organisational structure clearly identifying the person(s) responsible for quality control activities and/or for performing activities specific to the AWPCS.

A copy(ies) of the quality manual, or relevant procedures/work instructions, must be available for use by all employees that have a role or perform a function under the AWPCS.

Any alterations, amendments or corrections to the quality system or quality manual that may affect compliance with the requirements of the AWPCS must be submitted in writing to the certification body for approval prior to their implementation. A record of approval must be maintained by the certified facility.

5.3 Sourcing of wood

All wood used in the construction of wood packaging that is intended for use in export consignments must be sourced from an Australian treatment provider certified under the AWPCS.

A wood packaging manufacturer may obtain treated wood from a third-party supplier, provided that it can be demonstrated that the treated wood has been sourced from a certified treatment provider.

Note: A wood packaging manufacturer's quality system must include procedures for assessing a supplier's capacity to meet the specified requirements. Procedures may include on-site audits, inspection records or contractual agreements.

The manufacturer must confirm that the treatment provider is listed on the [AWPCS Register](#).

5.4 Segregation of treated and untreated wood packaging

All treated and untreated wood and wood packaging must be segregated to ensure that there is no mixing of treated and untreated lots. Segregation may include a physical barrier between lots, identification marks on lots or a specified separation distance between each lot.

The system of segregation must be able to be verified by the certification body at the time of audit.

5.5 Traceability

A wood packaging manufacturer's traceability system must allow all treated timber used in the manufacture of export wood packaging to be traced from receipt, through to manufacture, storage and despatch to clients.

A wood packaging manufacturer must provide documentation that allows trace back to the certified treatment provider from which the treated wood was sourced.

5.6 Application of ISPM 15 certification mark

The wood packaging manufacturer must apply the ISPM 15 certification mark to the manufactured wood packaging in accordance with [Section 4: The ISPM 15 certification mark](#).

5.7 Records management

The wood packaging manufacturer must maintain all records relating to the quality system for a minimum period of two years. Records must be retained to provide verification that the wood packaging manufacturer is consistently meeting the requirements of the AWPCS. All documentation must be made available for review by the certification body at the time of audit.

Documentation that must be retained for two years by the wood packaging manufacturer includes, but is not limited to:

- a record of the certification number assigned to the facility by the department
- traceability records, retained to a level that allows the fate of all treated wood packaging material to be traced from the receipt stage, right through to manufacture, storage and despatch to clients
- copies of treatment certificates issued by certified treatment providers.

Manufacturers have the option of either providing a copy of the original treatment certificate provided by the certified treatment provider or a completed copy of the *Timber Treatment Summary* ([Appendix 10](#)).

All fields in the *Timber Treatment Summary* are mandatory as they are considered necessary to provide traceability to the original treatment provider in the event that the on-selling manufacturer withdraws or is suspended from the AWPCS.

5.8 Certification requirements for off-site manufacturing - mobile manufacturers

Manufacturers that wish to assemble (complete the manufacturing process) at a location other than the location they are certified to operate from, must obtain a separate certification number for the off-site activities.

Compliance with all requirements that apply to manufacturers, including procedures for managing the security of devices used to apply the ISPM 15 certification mark, must be demonstrated.

Compliance must be verified through audit by an accredited certification body during an off-site assembly of wood packaging before a certification number for any off-site activity will be issued.

Company procedures for manufacturing off-site must be documented in the manufacturer's quality manual and may be included as an additional schedule.

Appendix 6: Requirements for wood packaging manufacturers with on-site treatment facility

6.1 Purpose

This section provides details of the requirements that must be met by a wood packaging manufacturer that both manufactures and treats wood packaging material on-site for certification under the AWPCS.

A wood packaging manufacturer seeking certification under this category must comply with the requirements set out below and with the requirements for a heat treatment provider ([Appendix 1](#)) dielectric heating ([Appendix 2](#)), or a methyl bromide ([Appendix 3](#)) or sulfuryl fluoride ([Appendix 4](#)) fumigator.

6.2 Quality systems and manuals

The wood packaging manufacturer must have a quality system in place that assures consistent compliance with the requirements of the AWPCS.

Note: The quality system may be one that has been established or recommended by a government authority, regulatory agency, industry, or it may be one developed by the wood packaging manufacturer.

The wood packaging manufacturer must document the procedures to be followed in the quality system in the facility's quality manual. The quality manual must be approved for use by an accredited certification body.

The quality system must include procedures to address the following:

- segregation of treated and untreated timber including how the treated wood packaging materials are stored away from any potential sources of infestation.
- traceability of treated wood from the treatment stage through to storage and despatch
- application of the ISPM 15 certification mark
- maintaining the security of the ISPM 15 certification mark
- manufacturing off-site
- records management
- the training provided to staff members responsible for quality control or involved in the treatment and/or manufacture of wood packaging material to ensure understanding of the requirements of the AWPCS
- complaints process that includes:
 - investigation of complaints

- identification of correction(s) and corrective action(s)
 - records of investigations and actions taken, and
 - communication with the complainant regarding the outcomes of the investigation.
- the relevant treatment (for example, heat treatment or methyl bromide fumigation) that the facility has in place for treating the wood packaging material

The quality manual must also include:

- a site plan of the facility
- an organisational structure clearly identifying the person(s) responsible for quality control activities and/or for performing activities specific to the AWPCS.

A copy(ies) of the quality manual or relevant procedures/work instructions must be available for use by all employees that have a role or perform a function under the AWPCS.

Any alterations, amendments or corrections to the quality system or quality manual that may affect compliance with the requirements of the AWPCS must be submitted in writing to the certification body for approval prior to their implementation. A record of approval must be maintained by the certified facility.

6.3 Sourcing of wood

Wood packaging manufacturers, with on-site treatment facilities certified under the AWPCS, may source untreated timber and then treat it on-site. The treated wood will then be approved for use in the construction of wood packaging that is intended for use in export consignments.

If required, a wood packaging manufacturer may obtain treated wood from a third-party supplier provided that it can be demonstrated that the treated wood has been sourced from a certified treatment provider.

Note: A wood packaging manufacturer's quality system must include procedures for assessing a supplier's capacity to meet the specified requirements. Procedures may include on-site audits, inspection records or contractual agreements.

The manufacturer must confirm that the treatment provider is listed on the [AWPCS Register](#).

6.4 Segregation of treated and untreated wood packaging

All treated and untreated wood and wood packaging must be segregated to ensure that there is no mixing of treated and untreated lots. Segregation may include a physical barrier between lots, identification marks on lots, or a specified separation distance between each lot.

The system of segregation must be able to be verified by the certification body at the time of audit.

6.5 Traceability

A wood packaging manufacturer's traceability system must allow all wood packaging material to be traced through treatment, manufacture, storage and despatch to clients.

If the manufacturer obtains treated wood from a third-party supplier, they must provide documentation that allows trace back to the certified treatment provider from which the treated wood was sourced.

6.6 Treatment of wood packaging material

The wood packaging manufacturer must ensure that all timber or wood packaging material is treated in accordance with an approved treatment method (for example, heat treatment, dielectric heating or fumigation).

If the wood packaging manufacturer heat treats their wood packaging material, they must meet the requirements specified in ([Appendix 1](#)).

If the wood packaging manufacturer uses dielectric heating to treat their wood packaging material, they must meet the requirements specified in ([Appendix 2](#)).

If the wood packaging manufacturer fumigates their wood packaging material, they must meet the requirements specified in ([Appendix 3 or Appendix 4](#)).

6.7 Application of ISPM 15 certification mark

The wood packaging manufacturer must apply the ISPM 15 certification mark to the manufactured wood packaging in accordance with [Section 4: The ISPM 15 Certification Mark](#).

6.8 Records management

The wood packaging manufacturer must maintain all records relating to the quality system for a minimum period of two years. Records must be retained to provide verification that the manufacturer is consistently meeting the requirements of the AWPCS. All documentation must be made available for review by the certification body at the time of audit.

Documentation that must be retained for two years by a wood packaging manufacturer includes but is not limited to:

- a record of the certification number assigned to the facility by the department
- traceability records, retained to a level that allows the fate of all treated wood packaging material to be traced from the treatment stage (or receipt of sourced from a third party), right through to manufacture, storage, and despatch to clients
- treatment records, including copies of treatment certificates issued by third party certified treatment providers.

- calibration records for all equipment as is appropriate to the individual provider and all records of monitoring activities conducted during treatment.

6.9 Certification requirements for off-site manufacturing – mobile manufacturers

Manufacturers that wish to assemble (complete the manufacturing process) at a location other than the location they are certified to operate from must apply for and obtain a separate certification number for the off-site activities.

Compliance with all requirements that apply to manufacturers, including procedures for managing the security of devices used to apply the ISPM 15 certification mark, must be demonstrated.

Compliance must be verified through audit by an accredited certification body during an off-site assembly of wood packaging before a certification number for any off-site activity will be issued.

Company procedures for manufacturing off-site must be documented in the manufacturer's quality manual and may be included as an additional schedule.

All wood packaging material that is manufactured at an off-site location must bear the ISPM 15 certification mark issued for either on-site or off-site operations.

Appendix 7: Requirements for certification bodies

7.1 Purpose

This section provides details of the requirements that must be met by a certification body when certifying facilities under the AWPCS.

The certification body must be accredited by JAS-ANZ for certifying facilities under the AWPCS.

The certification body must have policies and procedures to meet the requirements of the following:

- ISO/IEC 17065 – Conformity assessment - Requirements for bodies certifying products, processes and services
- ISO 19011:2011, Guidelines for auditing management systems
- the AWPCS requirements.

The certification body must ensure that all staff undertaking audits of facilities operating under the AWPCS clearly understand and can apply the requirements of the AWPCS.

7.2 Assessment of applications

Upon receipt of an application and quality manual from a facility applying for certification under the AWPCS, the certification body must:

- review the facility's quality manual to ensure that it meets the requirements specified in the AWPCS
- conduct an initial site audit of the facility(ies) to verify that it meets the requirements for certification under the AWPCS (provided the quality manual meets the requirements).

Initial on-site audits must be conducted in accordance with ISO 19011, and must be undertaken by an audit team with the appropriate technical knowledge to enable an effective assessment of the treatment (fumigation or heat treatment) and/or manufacturing process to be undertaken.

Initial audits must determine the facility's compliance with the requirements of the AWPCS applicable to the type of treatment and or manufacturing being undertaken at the premises or as an off-site operation. The audit must include a complete evaluation of the facility's treatment and/or manufacturing processes.

The certification body must identify non-conformities and inform the facility of the outcome of the audit at the closing meeting. Non-conformities must be classified as either major or minor, in line with the definitions in [Appendix 8](#). The certification body must provide a complete report of the audit activities to the facility.

All non-conformities must be closed prior to the awarding of certification to the facility.

Upon satisfaction that the facility can successfully meet the requirements of the AWPCS, the certification body must complete the *Request for Certification Number* form ([Appendix 11](#)) and submit the completed form to the department. The department will then assign a certification number. The certification body must provide this certification number to the facility.

Where the application for certification is lodged for a facility that is both a manufacturer and a treatment provider, all requirements documented in the AWPCS that apply to both a treatment provider and manufacturers must be met.

Where an application is lodged for a facility to undertake off-site treatment or manufacturing, a separate initial audit must be conducted to verify compliance with the AWPCS.

7.3 Verification audit requirements

Each certified facility will be subjected to a minimum of two audits in the first year of certification by an accredited certification body. These audits include the initial site audit and at least one verification audit. The verification audit must be conducted six months after the date of certification in the first year of accreditation. Verification audits must be conducted at approximately six-monthly intervals and occur once in each certification body reporting period to the department.

Provided the facility has been compliant in the previous audits the verification audit can become annual based on the decision of the certification body. Ongoing certification under the AWPCS is subject to the certified facility successfully passing the annual audit conducted by the certification body. In the event of a non-conformance during audit the facility returns to twice yearly audits until they have achieved two successive audits with zero non-conformities.

If a company has more than one site, each site must be treated as a separate certification and the annual audit requirements must be met.

If a company is certified to undertake off-site activities, then this must be treated as a separate certification and the biannual audit requirements must be met.

7.4 Detection of non-conformities

Upon the identification of non-conformity the certification body must determine whether the non-conformity is a minor or major non-conformity ([Appendix 8](#)).

7.5 Minor non-conformities

The certification body must provide written notification of minor non-conformities, including a description of the non-conformance to the certified facility within five working days. The certification body must follow up on corrective actions within a reasonable timeframe.

Audits that reveal three or more minor non-conformities may result in the certified entity having its certification suspended. Situations involving three or more minor non-conformities will be assessed on a case by case basis prior to suspending certification.

7.6 Major non-conformities

If an audit reveals that a certified facility is consistently unable to comply with the requirements of the AWPCS or a major non-conformity is detected, the certified facility's certification must be suspended immediately.

The certification body must provide notification of major non-conformities, including a description of the non-conformance to the certified facility within 24 hours of the assessment.

7.7 Re-instatement of facilities

A treatment provider or wood packaging manufacturer may re-apply for certification once it has completed all corrective actions necessary to prevent a recurrence of the non-conformity (ies) to the satisfaction of the certification body.

The facility must re-submit a satisfactory quality manual and a detailed report outlining the corrective measures taken to the certification body.

The certification body must conduct an audit of the facility to determine that the necessary corrective actions are adequate. Once deemed acceptable, the certification body must provide written notification to the department. The department can either assign a new certification number, or dependant on recommendation by certification body re-instate the existing number, to the facility. If applicable the certification body must provide the new certification number to the facility.

If issued a new certification number the certification body must ensure that the re-certified facility amends the ISPM 15 certification mark to include the new certification number, that all use of the old number has ceased and that old marking devices have been destroyed.

On re-certification, when the certification mark/number has changed, the certification body must provide the department with a copy of the company's new ISPM 15 certification mark as soon as possible following re-certification.

7.8 Reporting

On completion of each audit the certification body must provide a written report to the certified facility detailing the audit findings including any non-conformities; the agreed corrective actions; and timeframes for which they must be closed out by.

The certification body must advise the department in writing if a certified facility ceases to operate or has withdrawn from the AWPCS. If a facility wishes to withdraw from the AWPCS, they must notify the certification body who will then notify the department in writing and the AWPCS register will be amended to reflect this change.

The certification body must provide to the department on a six-monthly basis a written report detailing:

- the names and ABN of certified facilities audited, including date(s) of audits, type of audit performed (for example, initial site audit, on-going verification audit, follow-up corrective action audit(s), the results of audit(s), and follow up action for non-conformance.
- all minor non-conformities detected, including the planned corrective action and confirmation that the corrective action has been completed.

Note: Reporting periods are

- **July to December (report due 31 January)**
- **January to June (report due 31 July).**

The certification body must ensure that all major non-conformities, including a description are provided to the department within three working days of detection.

Appendix 8: Lists and descriptions of major and minor non-conformities

MINOR NON-CONFORMITY

An audit finding that reveals an isolated incident of non-conformity that has no direct impact on the integrity of the AWPCS.

The corrective action must be carried out to the satisfaction of the certification body.

Generally, **three or more minor non-conformities = a major non-conformity** (situation will be assessed on a case by case basis).

Examples of a **minor non-conformity** include, but are not limited to:

1. Segregation or identification of treated and untreated wood packaging is inadequate but does not affect the integrity of products ready for export.
2. Staff training has not been completed or records of training have not been maintained.
3. Record keeping at the facility is inadequate, but essential records pertaining to the treatment are complete.
4. Facility has failed to maintain records of previous audits conducted by the certification body.
5. The ISPM 15 certification mark applied by the facility isn't legible or clearly visible or not applied in accordance with the specifications (for example, dividing lines or symbols not as per the required standard).
6. Copy(ies) of quality manual not available for use by employees.
7. Quality manual is not up to date (for example, is not consistent with the quality systems in place at the facility).
8. Employee involved with implementing the quality system is unaware of the requirements of the AWPCS.
9. Treatment facility is unable to trace shipments of treated wood or wood packaging that is either sold or transferred to other certified facilities.
10. Records not available at the time of audit.
11. Treatment provider has not maintained calibration records.
12. Wood packaging material retains bark that is not within the ISPM 15 standard. Bark that is not less than 3 centimetres in width (regardless of the length) or greater than 3 centimetres in width, with the total surface area of an individual piece of bark more than 50 square centimetres.

MAJOR NON-CONFORMITY

Audit findings that reveal the integrity of the AWPCS has been compromised must result in the certified facility's certification being suspended immediately.

Examples of a **major non-conformity** includes but are not limited to:

1. The heat treatment or methyl bromide fumigation has not been completed in accordance with the specified standards (for example, the treatment fails to meet the minimum specified standards).
2. The certified facility is found to be applying the ISPM 15 certification mark to untreated wood packaging.
3. The wood packaging manufacturer is unable to demonstrate that only treated wood has been used in the manufacture of wood packaging material intended for export.
4. The treatment provider is unable to trace treated wood from the treatment stage, through to storage and despatch.
5. The certified facility is operating with significant changes to the quality systems that have not been approved by the certification body.
6. Corrective actions from previous audits have not been implemented and/or finalised.
7. Segregation of treated and untreated lots has not been maintained.
8. Records are significantly incomplete and do not allow the certification body to conduct trace-back of treated wood packaging.
9. The wood packaging manufacturer has not obtained treated wood from a certified treatment provider.
10. Intentional or fraudulent misuse of the ISPM 15 certification mark.
11. Inadequate management of security for ISPM 15 certification marking devices.
12. The certified facility relocates and commences manufacturing/treating wood packaging and applying the ISPM 15 certification mark prior to an on-site audit being conducted and approved by the certification body.

Appendix 9: Generalised format for treatment certificates

9.1 Generalised format for heat treatment certificate

<p>HEAT TREATMENT CERTIFICATE</p> <p><Certified Facility Letter Head></p> <p><ABN></p> <p>AWPCS Certification Number: _____</p> <p>This is to certify that the wood packaging material described below was heat treated on <u><insert date></u>, in accordance with the requirements of the Australian Wood Packaging Certification Scheme.</p> <p><u>Details of treatment</u></p> <p>Core Temperature of timber being treated: _____ (degrees Celsius) Duration: _____ (Continuous Minutes/Hours)</p> <p>Description of goods treated (including any distinguishing marks): _____</p> <p>_____</p> <p>_____</p> <p>Certified facility representative's name (print in full) _____</p> <p>Certified facility representative's signature: _____</p> <p>Date: _____</p>
--

9.2 Generalised format for dielectric heat treatment certificate

DIELECTRIC HEAT TREATMENT CERTIFICATE

<Certified Facility Letter Head>

<ABN>

AWPCS Certification Number: _____

This is to certify that the wood packaging material described below was heat treated on <insert date>, in accordance with the requirements of the Australian Wood Packaging Certification Scheme.

Details of treatment

Wood Profile Temperature of timber being treated: _____ (degrees Celsius)

Duration: _____ (Continuous Minutes/Hours)

Description of goods treated (including any distinguishing marks): _____

Certified facility representative's name (print in full) _____

Certified facility representative's signature: _____

Date: _____

9.3 Generalised format for fumigation certificate

FUMIGATION CERTIFICATE

<Certified Facility Letter Head>

<ABN>

AWPCS Certification Number: _____

This is to certify that the wood packaging material described below was fumigated with <insert methyl bromide or sulfuryl fluoride> on <insert date>, in accordance with the requirements of the Australian Wood Packaging Certification Scheme.

Details of treatment

Minimum temperature of the goods during fumigation: _____ (degrees Celsius)

Dosage: _____ g/m³

Duration: _____ hours

Method of treatment: _____

Description of goods treated (including any distinguishing marks): _____

Certified facility representative's name (print in full) _____

Certified facility representative's signature: _____

Date: _____

Appendix 10: Timber treatment summary

TIMBER TREATMENT SUMMARY

<Certified Manufacturer Letter Head>

<ABN>

AWPCS Certification Number: _____

This is to certify that the wood packaging material described below was treated in accordance with the requirements of the Australian Wood Packaging Certification Scheme.

Treatment details

A. Heat treatment

Core Temperature of timber being treated: _____ (degrees Celsius)

Duration: _____ (Continuous Minutes/Hours)

and/or

B. Dielectric Heat treatment

Wood Profile Temperature of timber being treated: _____ (degrees Celsius)

Duration: _____ (Continuous Minutes/Hours)

and/or

C. Fumigated with methyl bromide

Minimum ambient temperature during fumigation: _____ (degrees Celsius)

Dosage: _____ g/m³ Duration: _____ hours

and/or

D. Fumigated with sulfuryl fluoride

Minimum ambient temperature during fumigation: _____ (degrees Celsius)

Dosage: _____ g/m³ Duration: _____ hours

Description of treated timber (including any distinguishing marks)

<< Cert No. >> : <<volume of timber supplied & pack No.>> *** _____

*Invoice/delivery docket/certificate No:**** _____

Certified facility representative's name (print in full): _____

Certified facility representative's signature: _____

Date: _____

* **Cert No:** Certification number of the treatment provider

** **Volume of timber supplied & pack No.:** The amount (for example, cubic metres, pieces) and the pack number or batch number of the treated timber provided on the treatment certificate issued by the certified treatment provider

*** **Invoice/delivery docket/certificate No.:** A unique number that appears on the treatment certificate/delivery documentation that can be used to trace back to the treatment provider's treatment date.

Appendix 11: Request for Certification Number Form

AUSTRALIAN WOOD PACKAGING CERTIFICATION SCHEME FOR EXPORTS REQUEST FOR CERTIFICATION NUMBER FORM

This section is to be completed by the certification body	
Name of facility being granted certification:	
ABN of facility being granted certification:	
Address:	
Telephone number:	Fax number:
Facility contact name:	
Facility contact's position:	
Certified facility email:	
Facility Certification <i>(Tick/highlight relevant boxes)</i>	
<input type="checkbox"/> <i>Treatment Provider</i> <input type="checkbox"/> Methyl bromide fumigation <input type="checkbox"/> Sulfuryl fluoride fumigation <input type="checkbox"/> Dielectric <input type="checkbox"/> Fixed site Additional information:____	<input type="checkbox"/> <i>Manufacturer</i> <input type="checkbox"/> Without treatment facility <input type="checkbox"/> With treatment facility <input type="checkbox"/> Methyl bromide fumigation <input type="checkbox"/> Sulfuryl fluoride fumigation <input type="checkbox"/> Dielectric <input type="checkbox"/> Fixed site Additional information:____
Certification Body Details	
Name of Certification Body:	
Telephone number:	Fax number:
Mobile:	
Name of Auditor:	
Signature of Auditor:	
Date:	
Auditor email:	

This section must be completed by The Department of Agriculture, Water and the Environment

AWPCS certification number:

Name of department representative:

Signature of department representative:

Date:

(Department of
Agriculture, Water and
the Environment
STAMP)

***NOTE: A separate Request for Certification Form must be lodged for each site or mobile operation
This form is to be completed by the JAS-ANZ accredited certification body and a copy is to be emailed
to The Department of Agriculture, Water and the Environment via grain.export@awe.gov.au or
mailed to:***

**Department of Agriculture, Water and the Environment
Grain and Seed Export Program
GPO Box 858

CANBERRA ACT 2601**

Appendix 12: Certification Program - Notification for change in facility

AUSTRALIAN WOOD PACKAGING CERTIFICATION SCHEME FOR EXPORTS NOTIFICATION OF CHANGE IN FACILITY CERTIFICATION STATUS			
Certified Facility Name			
Facility ABN:			
AWPCS Certification Number/s:			
Address:			
Telephone number:		Fax number:	
Facility contact name:			
Position:			
Certified facility email:			
Facility certification - current status <i>(Tick/highlight relevant boxes)</i>			
<input type="checkbox"/> <i>Treatment Provider</i> <input type="checkbox"/> Methyl bromide fumigation <input type="checkbox"/> Sulfuryl fluoride fumigation <input type="checkbox"/> Heat <input type="checkbox"/> Dielectric <input type="checkbox"/> Fixed site <input type="checkbox"/> Mobile Additional information:____		<input type="checkbox"/> <i>Manufacturer</i> <input type="checkbox"/> Without treatment facility <input type="checkbox"/> With treatment facility <input type="checkbox"/> Methyl bromide fumigation <input type="checkbox"/> Sulfuryl fluoride fumigation <input type="checkbox"/> Heat <input type="checkbox"/> Dielectric <input type="checkbox"/> Fixed site <input type="checkbox"/> Mobile Additional information:____	
Facility Certification - Change in Scope <i>(Tick/highlight relevant boxes)</i>			
1. Extension of scope to include:		2. Reduction in scope to remove:	
<input type="checkbox"/> Treatment - Fumigation <input type="checkbox"/> Treatment - Heat <input type="checkbox"/> Treatment - Dielectric <input type="checkbox"/> Manufacturing <input type="checkbox"/> Mobile		<input type="checkbox"/> Treatment - Fumigation <input type="checkbox"/> Treatment - Heat <input type="checkbox"/> Treatment - Dielectric <input type="checkbox"/> Manufacturing <input type="checkbox"/> Mobile	
Facility Certification - Withdrawal/Suspension/Change in Ownership/Reinstatement <i>(Tick relevant boxes)</i>			
<input type="checkbox"/> Withdrawal	<input type="checkbox"/> Suspension	<input type="checkbox"/> Change in ownership/ABN	<input type="checkbox"/> Company no longer in operation
<input type="checkbox"/> Reinstatement	Comments:		

Date effective:	
Certification Body Details	
Name of Certification Body:	
Telephone number:	Fax number:
Mobile:	
Name of Auditor:	
Signature of Auditor:	
Date:	
Auditor email:	
<p><i>This form is to be completed by the JAS-ANZ accredited certification body and a copy is to be emailed to The Department of Agriculture, Water and the Environment via grain.export@awe.gov.au or mailed to:</i></p> <p>Department of Agriculture, Water and the Environment Grain and Seed Export Program GPO Box 858 CANBERRA ACT 2601</p>	