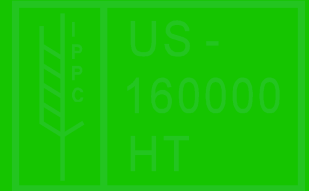


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ALSC CLARIFICATION ON REPAIRED WPM

Per the American Lumber Standard Committee (ALSC):

"A question has been received regarding Section 5.6.10 of the Wood Packaging Material Enforcement Regulations. Specifically, language stating that repaired pallets shall have the existing ISPM 15 quality mark obliterated was questioned as to whether this applied only to the WPM facility doing the repairs."

ALSC Staff Response:

"The staff position has been, and continues to be, that repaired WPM shall have any existing ISPM 15 quality marks obliterated. This applies not only to a WPM manufacturer repairing WPM onsite, but also applies to situations where that **WPM manufacturer is aware the WPM has been repaired**. Examples include sending WPM offsite to another facility to facilitate repair, bringing in WPM from a **supplier known to be a repair operation**, and receiving WPM from sister facilities repairing WPM."

Please note that this ALSC response applies to (among other things) repaired and remanufactured pallets. If a WPM site **receives** repaired and/or remanufactured pallets with original IPPC (ISPM 15) marks intact, **that site must remove** said marks by obliteration. Alternatively, the site could request that all IPPC marks from repaired and remanufactured pallets be removed prior to receipt (a practice already enforced for repair sites in the WPM program). Regardless of who ultimately removes the marks, this ALSC regulation shall be enforced at the site of receipt.

The intent of the ALSC enforcement regulation is to remove the heat treatment certification from items with questionable components.

Per ISPM 15:

"In circumstances where there is any doubt that all components of a unit of repaired wood packaging material have been treated in accordance with this standard, or the origin of the unit of wood packaging material or its components is difficult to ascertain, the NPPOs [USDA] of countries where wood packaging material is repaired should require the repaired wood packaging material to be re-treated, destroyed, or otherwise prevented from moving in international trade as wood packaging material compliant with this standard. In the case of retreatment, any previous applications of the mark must be permanently obliterated (e.g. by covering with paint or grinding). After re-treatment, the mark must be applied anew in accordance with this standard."

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