

**AMERICAN LUMBER STANDARD COMMITTEE, INCORPORATED®**

**WOOD PACKAGING MATERIAL ENFORCEMENT REGULATIONS**

**November 7, 2014**

**TABLE OF CONTENTS**

**1. INTRODUCTION ..... 3**

**2. STANDARDS ..... 3**

**3. HT AND KD HT LUMBER OR PACKING PRODUCING FACILITIES ..... 4**

**4. WOOD PACKAGING MANUFACTURING FACILITY REQUIREMENTS..... 4**

**5. INSPECTION AGENCY ACCREDITATION ..... 5**

**6. FUNCTIONS OF THE BOARD OF REVIEW ..... 14**

**7. INTERPRETATIONS..... 16**

**8. HEAT CHAMBER ..... 17**

**9. ADDITIONAL PROCEDURES..... 18**

**10. CONSTRUCTION..... 18**

## 1. INTRODUCTION

### 1.1 General

**1.1.1** Pursuant to the Memorandum of Understanding with the United States Department of Agriculture's Animal and Plant Health Inspection Service, this program shall establish a common basis for uniform, industry-wide inspection and quality marking procedures for the production of heat treated (HT) and kiln dried heat treated (KD HT) lumber to be used as wood packaging, the heat treating or kiln drying/heat treating of used, previously assembled, repaired wood packaging, lumber to repair such, or remanufactured wood packaging and the production of new, repaired or remanufactured wood packaging products by manufacturing facilities in compliance with the requirements of the International Plant Protection Convention (IPPC) *Regulation of Wood Packaging Material in International Trade*<sup>1</sup> (standard).

**1.2** Heat Treated (HT) - lumber or used, previously assembled, repaired or remanufactured wood packaging which has been placed in a closed chamber and artificial heat added until the lumber or packaging achieves a minimum core temperature of 56°C for a minimum of 30 minutes. *Note: 2013-13 CPM-8 adopted revised Annex 1 to ISPM 15 to include heat treatment using dielectric heating. When lumber or used, previously assembled, repaired or remanufactured wood packaging material is heat treated using dielectric heating the treatment code mark shall be DH.*

---

<sup>1</sup> Wood packaging material is defined as wood packing other than that comprised wholly of wood-based products such as plywood, particle board, oriented strand board, veneer, wood wool, etc., which have been created using glue, heat and pressure or a combination thereof.

**1.3** Kiln Dried Heat Treated (KD HT) - lumber or used, previously assembled, repaired or remanufactured wood packaging which has been placed in a closed chamber and artificial heat added until the lumber or packaging achieves a minimum core temperature of 56°C for a minimum of 30 minutes and which is dried to a maximum moisture content. KD shall mean kiln dried to a maximum moisture content of 19 percent at time of surfacing. Moisture content limits of less than 19 percent maximum moisture content shall only be specified if included in rules certified by the Board of Review. For lumber of nominal 5-inch or greater thickness, other moisture-content limits shall be specified only if included in rules certified by the Board of Review.

### 1.4 Wood Packaging

**1.4.1** Products Covered

- Wood packaging

**1.5** Examples of products produced from wood packaging may include, but not limited to:

- Pallet
- Crates
- Boxes
- Dunnage

**1.5** Dunnage, as defined by ISPM 15 is wood packaging material used to secure or support a commodity but which does not remain associated with the commodity. As dunnage is a wood packaging product available as an individual piece of lumber it is a product with special considerations. Those considerations are:

1. Dunnage is not intended for use in the construction of wood packaging material pallets, crates, boxes, etc.
2. The seller shall inform its customers of the requirements of its use.
3. When improper use of dunnage is

encountered, the agency shall take corrective action with the producer and, if necessary, the customer or owner. If for any reason the improper use is not corrected, the agency under whose supervision the dunnage was produced shall, at a minimum, notify the producer and the customer or owner of their responsibilities should any damages and liability arise from the improper use of dunnage.

## **2. STANDARDS**

**2.1** The allowable processes shall be based on those referenced in the International Plant Protection Convention Guidelines for wood packaging or standards developed by other entities, if included under this program.

**2.2** Periodic auditing of the HT and KD HT facility and the wood packaging manufacturing facility shall be carried out by an inspection agency accredited by the Board of Review of the American Lumber Standard Committee (ALSC).

**2.3** The detailed procedures by which the agency shall monitor adherence to the above standards shall be those approved by the Board of Review.

**2.4** Board of Review activities involve verification of the inspection agencies' abilities and monitoring of performance.

## **3. HT AND KD HT LUMBER OR PACKAGING PRODUCING FACILITIES**

**3.1** Accreditation of agencies auditing HT and KD HT facilities and agency auditing of those facilities shall be pursuant to the American Lumber Standard Committee, Incorporated® Board of Review Enforcement Regulations for untreated lumber.

## **4. WOOD PACKAGING MANUFAC-**

## **TURING FACILITY REQUIREMENTS**

### **4.1 Facility Records**

**4.1.1** Each facility shall maintain a systematic method of keeping records and in-facility quality control procedures approved by its agency which shall include internal quality control procedures sufficient to demonstrate:

**4.1.1.1** With the exception of new, repaired or remanufactured wood packaging heat treated on-site, the wood being used or to be used in the manufacture or repair of wood packaging (pallets, crating, boxes, dunnage, etc.) under this program is labeled HT or KD HT under the supervision of an agency accredited by the Board of Review.

**4.1.1.2** The volumes of HT or KD HT wood being purchased from agency certified HT or KD HT facilities are adequate based upon documentation to produce the quantities of wood packaging pallets, crating, boxes, dunnage, etc. that are being labeled.

**4.1.1.3** The wood packaging pallets, crating, boxes, etc. produced bear label(s) containing the following information:

- a) The approved international symbol for compliant wood packaging.
- b) The two letter ISO country abbreviation followed by a unique number assigned by the National Plant Protection Organization (NPPO) to the manufacturer of the wood packaging.
- c) The term "Heat Treated" abbreviated "HT" and if applicable, the moisture content designation "Kiln Dried" abbreviated "KD" as provided for in the Board of Review certified grading rules.
- d) The identifying symbol, logo or name of the accredited agency.

**4.1.1.4** The dunnage produced bear label(s)

containing the elements required in 4.1.1.3 and the term "Dunnage" or abbreviation "Dun".

**4.1.2** Maintaining quality conforming to the standard is the responsibility of facility management. Internal quality control procedures shall be performed to a level that assures compliance of the product to the IPPC standard. Wood packaging found to be in non-conformance shall either be remanufactured and conformance verified, or the quality mark shall be removed from the product.

**4.1.3** Management shall appoint an adequately trained employee to supervise facility quality control who shall be vested with the authority to correct any condition causing non-conformance, to remove the quality mark from any product that does not conform to the IPPC standard, to stop shipments of quality marked non-conforming product and to hold shipments of product until conformance is regained.

## **5. INSPECTION AGENCY ACCREDITATION**

### **5.1 Approval**

**5.1.1** Service by an accredited agency shall only be extended to a wood packaging facility that uses HT and/or KD HT lumber for manufacture of wood packaging products (pallets, crating, boxes, dunnage, etc.) or facilities with on-site capability to heat treat wood packaging products or components.. Such facilities shall meet all of the requirements of the ALSC Wood Packaging Material Policy and these regulations.

**5.1.2** The initial and continuing accreditation of an agency to provide inspection services under these regulations is contingent upon providing reliable and adequate inspection services in accordance with the current and applicable IPPC standard.

The Board of Review will among other things use these regulations to judge the competency, reliability and adequacy of an agency to supervise wood packaging facilities in accordance with the IPPC standard.

### **5.2 Participation in this program**

**5.2.1** Any agency is eligible to participate in this program as established herein provided the agency:

- (a) Formulates, maintains and makes available its quality control and inspection procedures for the specific wood packaging which it inspects and which are covered by the IPPC standard.
- (b) Demonstrates initial and continuing competency and reliability in the field of the wood packaging inspection.
- (c) Agrees to pay charges and fees assessed by the ALSC.

**5.2.2** Any agency desiring to participate in this program shall apply in writing to the Manager of the Board of Review in such form as may be prescribed by the Manager. If the application is in proper order, the Manager shall promptly forward the application to the Board of Review for its consideration and the Manager shall undertake any further investigations of the applicant as may be requested by the Board of Review. The applying agency shall be responsible for the fees established to cover expenses incurred in conducting the qualification analysis. Such fees are to be paid in advance.

### **5.3 Accreditation Requirements**

Prior to accrediting any agency to provide inspection services for wood packaging the Board of Review shall require evidence that the agency conforms to the following

requirements:

**5.3.1** The agency shall not be controlled by any person or firm whose own products are subject to its inspection and certification nor shall its inspectors be employed by any lumber producer, heat treater, kiln drier, repairer, remanufacturer or manufacturer of wood packaging or by any buyer of lumber, or engaged in any other undertaking which might conflict with their independent position as inspectors.

**5.3.2** The agency shall maintain the practice of having all inspections performed by properly supervised and qualified inspectors all of whom shall be under the direct control of the agency. Each inspector shall be thoroughly competent in the inspection of wood packaging of the species being inspected. Inspectors shall be directed by a chief inspector, supervisor or manager who is thoroughly experienced in the inspection of wood packaging products and who shall be held responsible for the proper functioning of the members of the inspection staff.

**5.3.3** The agency shall maintain a bona fide wood packaging facility audit service for the purpose of monitoring the uniform application by the agency of the IPPC standard and agency quality control and inspection procedures. The agency's samples shall be representative of a facility's production in inventory at the time of inspection. Written reports of each inspection shall be made to the wood packaging facility and copies shall be kept available by the agency for examination by the Board of Review or its representative upon request. These records shall be kept for a minimum of two years.

**5.3.3.1** It is the obligation of the agency to audit the wood packaging facility on a periodic basis, and the obligation of the wood packaging facility to produce a properly labeled wood packaging product. Samples of previ-

ously manufactured wood packaging products shall be inspected in accordance with the Policy as part of the agency supervision. The agency shall sample a sufficient amount of wood packaging representative of the products produced by the wood packaging facility to adequately evaluate the proficiency of the facility. When a sample of wood packaging indicates the product is not properly labeled the product shall be corrected. The agency shall verify that the product has been corrected by either removal of the quality mark or by remanufacture of the wood packaging product. The agency shall take whatever steps necessary to prevent recurrence. Each month the agency headquarters personnel shall review the performance of each wood packaging facility and take whatever action warranted. In addition, the review shall include the assessment of the agency sample results for each inspection. If the inspection results fail to meet the specified criteria, the agency shall increase inspections until such time as the results are within the specified criteria at which time the frequency of inspections may return to normal.

**5.3.4** The agency shall conduct all audit and inspection activities in a manner which complies with all requirements of these Enforcement Regulations and its quality control and inspection procedures as approved by the Board of Review.

**5.3.5** The agency shall adhere to the policy of uniformly requiring its inspectors or its agents to determine conformance to all applicable specifications before issuing a certificate thereon or marking the wood packaging product with the agency symbol.

**5.3.6** The agency shall uphold the standards of the industry through proper inspection procedures and shall maintain sufficient checks of its inspection staff to assure not only the continuing honesty, integrity and competency of its members, but

consistency on their part in the proper application of wood packaging specifications.

**5.3.7** Irrespective of production levels each wood packaging facility shall be inspected a minimum of twelve times per year at approximately monthly intervals, except in those cases where a facility is inactive in excess of 2 months in any 12 month period in which case an inspection is required for each month the facility actually produces wood packaging.

**5.3.8** All accredited agencies shall provide at all times an adequate, competent and reliable inspection service according to the requirements of these Enforcement Regulations

**5.3.9** All quality control and inspection procedures submitted for approval shall conform to the minimum requirements of the applicable IPPC standard and to the requirements of these Enforcement Regulations. If deficiencies are found in the review of an agency's quality control and inspection procedures, the deficiencies shall be brought to the attention of the agency. The agency shall have the option of amending its procedures to conform or requesting a hearing before the Board of Review.

**5.3.10** An agency shall agree to have its quality control and inspection procedures carry a specific reference to the approval by the Board of Review and that these procedures conform to the applicable IPPC standard.

**5.3.11** When quality control and inspection procedures have been approved by the Board of Review, subsequent revisions shall be submitted by the promulgating agency to the Board of Review for approval.

**5.3.12** Security and Contracts. The Board of Review shall require as a condition to its accreditation of any agency the payment when

due of all charges and fees assessed by the ALSC to cover the cost of carrying out the ALSC and Board of Review functions and the reimbursement to the ALSC for all costs and expenses incurred by the ALSC or its Board of Review in any investigation of the activities or practices of the agency, whether or not the investigation is initiated by the ALSC or its Board of Review or upon complaint. The Board of Review shall require that each accredited agency execute a contract with the ALSC in such form and containing such provisions as the ALSC may from time to time decide, and that each such agency observe and act in a manner consistent with the provisions of the contract.

**5.3.13** The Board of Review shall require each accredited agency to prepare and submit to it for approval, a form of contract which each agency shall require the subscribing wood packaging facility to execute. Accredited agencies shall maintain copies of contracts executed with each wood packaging facility receiving their services. Copies of contracts shall be retained for a period of not less than two years after termination of such contracts.

**5.3.14** Agency Policy Changes. If at any time there should be any change in any policies of an agency relative to matters that are required under the Enforcement Regulations, the agency shall immediately notify the Board of Review in writing.

#### **5.4 Agency Accreditation for Facility Supervisory Service and/or Lot Inspection Service**

**5.4.1** The Board of Review shall require an applicant to submit complete information as to its form or organization, the length of time it has functioned, the experience of its management as well as the individual inspection personnel and the supervision of its inspection staff. The applicant shall also submit, as applicable to the service(s) offered:

complete information about the facilities under its supervision, the production volume of the facilities, programs for which supervision will be offered, programs for which lot inspection services will be offered, procedures for handling requests for lot inspection, the species involved, adequate provisions for supervision of in-facility quality control, supervision of wood packaging facility performance, authority to apply the agency's quality mark and evidence that all applicable requirements of the IPPC standard are being met by the agency and its member facility.

**5.4.2** Before accrediting the inspection service(s) of any agency, the Board of Review shall require evidence that the agency conforms to all the requirements of Section 5.2 and Section 5.3 of these Enforcement Regulations in the conduct of its facility supervision and/or lot inspection services and that the agency conforms to its own approved quality control and inspection procedures, these Enforcement Regulations and all applicable IPPC standards.

## **5.5 Application of the Quality Mark and Certificates of Inspection**

**5.5.1** The application of the quality mark shall be accomplished by one of two methods: by facility employees under the supervision of an accredited agency or by employees or qualified agents of the accredited agency, as specified herein. Application of the quality mark of agencies approved to conduct supervisory services under the wood packaging program shall be conducted under the requirements of these Enforcement Regulations, the agency's quality control and inspection procedures and approved procedures for the withdrawal of services for unsatisfactory performance. When an employee or qualified agent of any agency is regularly stationed at a point of production, they shall be checked at the same intervals in the same manner as a facility employee would

be checked by a supervisory agency.

**5.5.2** Lot inspections and certificate of inspection shall be permitted at any point where there is good and sufficient reason for them and shall be performed only by qualified agency personnel or qualified agents of an accredited agency.

**5.5.3** Wood packaging material accepted by the Inspector on a certificate inspection shall be identified by the Inspector's hammerbrand or other identifying mark and the identifying mark shall be shown on the certificate.

## **5.6 Marking**

**5.6.1** An accredited agency is permitted to license the use and application of its quality mark to complying wood packaging products by any manufacturing facility which subscribes through the agency to this program.

**5.6.2** Continued use of the quality mark is subject to continued conformance to the IPPC standard as determined by sampling in accordance with these Enforcement Regulations.

**5.6.3** Application of the quality mark to products covered by the IPPC standard by a wood packaging facility licensed by an accredited agency constitutes declaration that the product has been produced under the agency's quality control program.

**5.6.4** A quality mark shall not be applied to any product where the material is misrepresented by a confusing or deceptive grade mark, label, brand or certificate.

**5.6.5** When the quality mark of an accredited agency is applied each wood packaging product shall be marked and wood packaging products bearing a quality mark shall not be mixed with non-marked products.



With the exception of dunnage, quality marks should be placed in a visible location on at least two opposite sides of the wood packaging product but are not required on each individual component piece of a wood packaging product.

**5.6.5.1** When the quality mark of an accredited agency is applied to dunnage, marks should be applied in a visible location at least once per piece. When the dunnage is to be cut to other sizes by the customer multiple marks may be applied.

**5.6.6** Quality marks of accredited agencies shall be uniform in providing the required information, shall be legible when placed on wood packaging products and shall be in the format shown below. The following minimum information is required to be contained on the quality mark whether stamped, labeled or branded (tags are not permitted) and also with a certificate:

**5.6.6.1** The approved international symbol for compliant wood packaging.

**5.6.6.2** The two letter ISO country abbreviation followed by a unique number assigned by the NPPO to the producer of the wood packaging.

**5.6.6.3** Wood packaging facility name or facility number.

**5.6.6.4** The term "Heat Treated" abbreviated "HT" or the term "Dielectric Heating" abbreviated "DH", and if applicable, the moisture content designation "Kiln Dried" abbreviated "KD" as provided for in the Board of Review certified grading rules.

**5.6.6.5** The identifying symbol, logo or name of the accredited agency.



**5.6.6.6** In the case of dunnage, all elements of Section 5.6.6 and the term "Dunnage" or "Dun"



**5.6.7** A representative facsimile of an agency's quality mark shall be on file with the Board of Review.

**5.6.8** It is the policy of the ALSC that wood packaging facility quality marks, grade marks, grade stamps, labels, brands, certificates or other product description shall not be confusingly or deceptively similar to the quality marks of any Board of Review accredited agency, including, but not limited to, reference to the IPPC standard directly or indirectly.

**5.6.9** It is the policy of the ALSC that wood packaging facility quality marks, grade marks, grade stamps, labels, brands, certificates or other product description shall not misrepresent wood packaging products, in this program or outside it, including, but not limited to, reference to the IPPC standard directly or indirectly.

**5.6.10** The existing ISPM 15 quality mark shall be obliterated when ISPM 15 quality marked wood packaging material is:

- **Repaired:** The existing quality marks on the wood packaging shall be obliterated unless the facility has an agency approved process in place to assure compliance to Section 4.3.2 of ISPM 15 in all respects, including assurance that all components of the repaired wood packaging material have been treated in accordance with the standard. When the existing quality marks on repaired wood packaging are obliterated, such wood packaging shall be remarked as ISPM 15 compliant only after the wood packaging material has been subjected to the heat treatment process.
- **Remanufactured:** The existing quality marks shall be obliterated. Such wood packaging shall be remarked as ISPM 15 compliant only after the wood packaging has been subjected to the heat treatment process.

**5.6.10.1** Any representative sample subject to quality mark obliteration found to contain over 5% wood packaging material with quality marks not obliterated shall be corrected.

**5.6.11** To obliterate means to render the approved mark or stamp unreadable or clearly inapplicable. Examples of obliteration of the approved mark or stamp include, but are not limited to removal by sanding or abrasion, over-stamping with opaque indelible ink or paint applied in a solid block, multiple 'x' stamp or other means of over-marking with opaque indelible ink or paint. Marking through the approved mark or stamp with a semi-transparent ink, paint, or crayon which allows full, though possible reduced visibility of the approved mark or stamp does not constitute obliteration.

**5.6.12** Each accredited agency shall be responsible for the control of its quality marks. Quality marks shall only be used at

facilities or by personnel authorized by accredited agencies. Accredited agencies shall require a participating facility to provide care and security of the agency quality marks. An accredited agency shall retain on file a facsimile of each quality mark issued, require worn out or discarded quality marks to be destroyed, and require missing or stolen quality marks be reported to the agency. An accredited agency shall have an ongoing practice of reporting and reviewing stamp inventories, generally monthly, to ensure reconciliation in agency records regarding the types and number of stamps issued to each facility. The agency shall report missing, stolen, or misuse of its quality marks to the Board as soon as the agency is aware of such.

**5.6.12.1** Except by prior written arrangement with the agency and notification to the ALSC, the quality marks issued by an agency to a specific facility location are to be used only at that location. The written permission shall be maintained by the agency and shall be subject to ALSC audit.

**5.6.13** Any item containing 10% or more quality marks deemed to be illegible or incomplete shall be corrected.

## **5.7 Warnings, Suspensions and Withdrawals**

**5.7.1** Accredited agencies shall issue warning or suspension to, or withdraw quality marks from any facility utilizing their services when an inspection or a series of inspections reveals serious non-conformances. An agency will immediately notify the Manager of the Board of Review by letter when it warns, suspends or withdraws the quality marking services at any facility for cause, supplying all pertinent details. Upon receipt of such notice, the Manager of the Board of Review shall immediately notify by letter all other accredited agencies extending services in the area. No other agency shall extend supervisory service

or any other quality marking services to the facility for a period of 180 days in the case of a suspension or withdrawal notice, or 60 days in the case of a warning notice, after the date of the letter of the agency's notification, unless the wood packaging facility has been reinstated by the agency which warned, suspended or withdrew its service, when the services of the other agency result in evading the warning, suspension or withdrawal. The agency may reinstate quality marking supervisory services only after the facility involved demonstrates the ability and willingness to maintain the applicable requirements of the agency's quality control and inspection procedures, these Enforcement Regulations and the IPPC standard. The agency shall file a complete report with the Manager of the Board of Review outlining all corrective steps taken. (editorial change July 28, 2010)

## **5.8 Reinspection**

**5.8.1** Reinspection by agencies accredited by the Board of Review shall be available to both buyer and seller upon request for the purpose of determining compliance with specifications of this program and effecting settlement of complaints.

**5.8.2** Complaint regarding product compliance with the requirements of the IPPC standard may be made to the wood packaging facility for 90 days after shipment. Partial use of a shipment shall not prejudice the right to reinspection as long as the unused portion is in the form in which it was shipped.

**5.8.3** It is permitted to file a complaint for excess moisture regarding wood packaging marked, certified or invoiced as being manufactured meeting a particular moisture content as provided for in 5.6.6. Complaints shall be filed within 72 hours after receipt of shipment provided the wood packaging is not in use and has been continuously protected in

shipment and in storage. It is the responsibility of the wood packaging facility to manufacture the wood packaging product from KD HT quality marked component pieces when specified.

**5.8.4** Where the wood packaging product is represented as "Heat Treated (HT)" by a quality mark, certificate or invoice, HT is defined as lumber or used, previously assembled, repaired or remanufactured wood packaging which has been placed in a closed chamber and artificial heat added until the lumber or packaging achieves a minimum core temperature of 56°C for a minimum of 30 minutes and each component piece in the wood packaging product shall meet the HT specification.

**5.8.5** Where the wood packaging product is represented as "Kiln Dried Heat Treated (KD HT)" by a quality mark, certificate or invoice, KD HT is defined as lumber or used, previously assembled, repaired or remanufactured wood packaging which has been placed in a closed chamber and artificial heat added until the lumber or packaging achieves a core temperature of 56°C for a minimum of 30 minutes and which is dried to a maximum moisture content and each component piece in the wood packaging product shall meet the KD HT specification. KD shall mean kiln dried to a maximum moisture content of 19 percent at time of surfacing. Moisture content limits of less than 19 percent maximum moisture content shall only be specified if included in rules certified by the Board of Review. For lumber of nominal 5-inch or greater thickness, other moisture-content limits shall be specified only if included in rules certified by the Board of Review.

**5.8.6** A reinspection involving a complaint on moisture content shall be made in accordance with the provisions of the certified grading rules under which the lumber or packaging was marked. All wood packaging

conforming to the maximum allowable moisture content shall be separated from those exceeding that maximum.

**5.8.7** The expense of reinspection shall be borne in accordance with the provisions of the quality control and inspection procedures of the applicable agency, however, the person calling for the reinspection shall be responsible to the agency for the costs thereof.

## **5.9 Agency Reports**

The Board of Review shall require reports to be rendered at such times it determines necessary. The reports shall include, among other things, information as follows:

**5.9.1** The number of inspections performed during a particular period and the volume of wood packaging involved.

**5.9.2** Reinspection of wood packaging originally certified by the agency or marked with an agency's quality mark during a particular period with details on each, including the name of the original inspector and the date of the original inspection if certification is involved, the point of origin, name and location of the consignee, date of reinspection, item(s) and quantities involved and results of the reinspection.

**5.9.3** A summary report on the agency's own facility inspections for a given time which generally shall coincide with the random sample survey conducted by the Board of Review.

## **5.10 Record Retention**

**5.10.1** As a condition of accreditation, an agency shall maintain for a period of at least two years records of all inspections made. These records shall be available for examination by a representative of the Board of Review at any time during normal working

hours. Employees of an agency whose principal job is inspecting a facility's performance shall be supervised by the agency and reports of the supervision kept in the agency's files for a period of two years.

## **5.11 Field Examination**

**5.11.1** Each agency shall agree to permit staff representatives of the Board of Review to examine any wood packaging certified and/or quality marked by the agency or under the agency's supervisory service at facilities or destination points, for the purpose of checking the performance of the agency, its inspectors and the general reliability of its service.

**5.11.2** Board of Review staff personnel shall have the right to examine unmarked material at facilities and at destination points.

**5.11.3** The agency shall agree that if any wood packaging which it has certified or quality marked or is produced under its supervisory service whether quality marked or not, is found to be deficient, the agency shall cooperate fully in taking such steps as shall be necessary to eliminate the risk of recurrence of such deficiencies by the same inspector or facility. Each agency shall also agree that serious deficiencies, when found, shall require complete reinspection of the shipment or lot.

## **5.12 Random Sample Survey**

**5.12.1** The Board of Review shall conduct on a random sampling basis, inspections on wood packaging produced by each accredited agency's facilities. The facilities included in each survey shall be selected at random and shall be of sufficient number to be deemed representative of the total volume of wood packaging produced under an accredited agency's authority. The results of the random sample survey shall be used by the Board of Review as one measure of determining the continuing competency and reliability of an

accredited agency.

### **5.13 Agency Follow-up**

#### **5.13.1 Unsatisfactory Reports**

When a field report by a Board of Review inspector reveals a serious infraction, the Board of Review or its staff shall promptly notify the agency of the infraction, send the agency a copy of the inspector's report, and request that the agency take corrective action with the facility or agency employee involved to prevent a recurrence of the infraction. The agency shall reply stating in detail the corrective actions taken, and shall continue to make such reports until such time as it is satisfied that a recurrence of the infraction is unlikely and it notifies the Board of Review that it is satisfied. Appropriate documentation shall accompany all reports.

The Board of Review shall periodically evaluate the effectiveness of an agency's follow-up. The Board of Review shall to the extent possible confirm that the agency did in fact take all action as reported to the Board of Review.

The Board of Review shall maintain records of the agency's follow-up performance. These records shall be used by the Board of Review as one measure of the continuing competence and reliability of an agency.

#### **5.13.2 Board of Review Requested Reinspection.**

(a) Destination: Upon finding that a given shipment of wood packaging that is quality marked and/or certified appears to contain serious infractions, the Board of Review inspector without divulging detailed information to the customer shall request the material be held for reinspection. The inspector shall immediately notify his office with full details of the infraction. The office of the Board of Review shall immediately notify the agency whose

quality mark appears on the material and the agency in turn shall immediately advise the customer holding the material that a prompt reinspection is to be made by the agency at no cost to the customer provided the customer agrees to hold the wood packaging and furnish labor if necessary (for which the customer shall be reimbursed by the agency) and further agrees to assess no holding charges for the wood packaging held for reinspection.

The agency shall furnish results of the reinspection to all parties of the transaction. Costs of such reinspection shall be funded by the ALSC except when the wood packaging is found to be non-conforming according to the reinspection provisions shown in Section 5.8 of these Enforcement Regulations. In which case the shipping facility shall be responsible to the agency for the cost of the reinspection.

(b) Origin: Upon finding quality marked and/or certified material at the point of origin which contains serious infractions, the Board of Review inspector shall request the facility to hold the material for review by the agency and notify the Board of Review office immediately of the infraction giving full details. The office of the Board of Review shall immediately notify the agency whose quality mark appears on the material. The agency shall immediately notify the facility management and confirm that the material is to be held for review by the agency. The agency shall review the material being held and determine the appropriate action and shall promptly report the actions taken to the Board of Review. Any facility failing to hold such material shall be subject to having the use of its quality marking devices suspended immediately.

**5.13.3** If the agency disagrees with the ALS field representative's finding as to the labeling of the wood packaging material, the agency shall notify the ALS office and give the ALS an opportunity to review the wood packaging material with an agency representative if nec-

essary. If this procedure is not followed, the ALS report stands.

#### **5.14 Board of Review Origin and Destination Inspections**

**5.14.1** The results of origin and destination inspections may be used by the Board of Review as one means of determining an agency's performance.

#### **5.15 Board of Review Enforcement Actions**

**5.15.1** Probation, Suspension or Revocation of Agency Accreditation: The Board of Review shall judge the continued competency, reliability, adequacy and integrity of accredited agencies under these Enforcement Regulations. The Board of Review, after reviewing the competency, adequacy, integrity and performance of an agency, shall take any of the following actions as in the judgment of the Board of Review is necessary to maintain the integrity of this program.

- (a) Place an agency on probation.
- (b) Suspend the accreditation of an agency.
- (c) Revoke the accreditation of an agency.

In arriving at its decision to take any of the above actions, the Board of Review shall consider any information at its disposal, including, but not necessarily limited to, the information contained in agency reports to the Board, results of the random sample survey inspection, destination inspections and follow-up performance of an agency in specific instances. Actions of probation, suspension or revocation by the Board of Review shall be made public.

**5.15.2** Board of Review Procedures: Before any agency is placed on probation or its accreditation is suspended or revoked by the Board of Review, the Board shall notify the

agency that enforcement actions against the agency may be taken by the Board and the agency shall be afforded opportunity to appear before the Board in person and by counsel in connection with such pending action by the Board. A Board of Review action placing an agency on probation, suspending or revoking the accreditation of an agency shall be taken on the basis of evidence introduced on the record in a hearing held by the Board with opportunity on the part of the agency concerned to examine the evidence of record and to cross examine witnesses testifying before the Board and the opportunity on the part of the agency concerned to submit its own evidence in the hearing.

#### **5.16 Lapse of Accreditation**

**5.16.1** If an accredited agency shall not have inspected any wood packaging for a period of two years, the accreditation of that agency shall thereupon lapse and terminate, unless the agency shall establish grounds for continuance of its accreditation. Lapse and termination of accreditation shall not prejudice later reapplication for accreditation.

### **6. FUNCTIONS OF THE BOARD OF REVIEW**

#### **6.1 Inspection Visits**

Inspections conforming with the Policy shall be performed by the field staff of the Board of Review for the purpose of monitoring agency performance. Four types of inspection shall be made. They are as follows:

- (a) Random Sample Survey Inspections
- (b) General Inspections
- (c) Destination Inspections
- (d) Recall Inspections

The purpose for each type of inspection is:

**6.1.1** Random Sample Survey: Inspections

shall be made at a specific number of an agency's facilities chosen at random. The number of facilities chosen for inspection from each agency shall be determined by the number of facilities an agency supervises. Samples from randomly selected wood packaging product shall be obtained at each facility and the number of samples taken at any facility included in a survey shall be dependent on the facility's annual production.

**6.1.2** General Inspections: Inspections shall be made at facilities on a general basis. Samples taken at these inspections shall be from any wood packaging present at the facility at the time of inspection.

**6.1.3** Destination Inspections: Destination inspections shall be made in chosen market areas.

**6.1.4** Recall Inspections: Where serious deficiencies are found at a facility during a random sample survey inspection, at a destination inspection, or a general inspection, recall inspections shall be made to determine that the deficiencies have been corrected.

## **6.2 Inspection**

**6.2.1** Items that shall be checked for each inspection include:

**6.2.1.1** The use of wood packaging product component pieces labeled as HT or KD HT with Board of Review accredited agency marks.

**6.2.1.2** Traceability of the HT or KD HT wood packaging component pieces.

**6.2.1.3** Correct use of quality mark.

**6.2.1.4** Correctness and legibility of quality marks.

**6.2.1.5** Agency and facility adherence to requirements of Section 4.

**6.2.2** When material bearing an agency's quality mark is found to be non-conforming during any Board of Review inspection, the agency shall be notified immediately. It shall be the obligation of the agency to take immediate corrective actions and report such actions to the Board of Review.

## **6.3 Record Review**

The records of each accredited agency shall be checked at least annually by staff personnel of the Board of Review.

The following groups of records shall be among those checked:

**6.3.1** Records pertaining to agency supervision of its own inspection staff, including records of initial inspector training and continuing inspector training, records of the correction of deficiencies in individual inspectors, records showing specific qualifications of individual inspectors and records showing assignments of individual inspectors.

**6.3.2** Records pertaining to facility inspections including results of samples taken during facility inspections. Records of procedures for application of the quality mark. Records of frequency of facility inspections.

**6.3.3** Records pertaining to the correction of deficiencies, found by agency inspection at facilities and destination sites and their satisfactory correction and records of reinspection generated by customer complaint and the settlement of claims.

**6.3.4** Records pertaining to enforcement, including records of facility qualification, of warnings issued, suspensions, and revocations.

## **6.4 Findings**

#### **6.4.1 Records**

The result of the Board of Review's staff review of an agency's records shall be reported to the Board of Review. The Board of Review shall use this information and all other information available to the Board in its evaluation of an agency's adequacy, competency and reliability.

#### **6.5 Board of Review**

**6.5.1** The Board of Review shall judge the performance, efficiency, reliability, and integrity of agencies based on reports of the Board of Review's staff using the procedures in Section 5 and all other information available to it.

### **7. INTERPRETATIONS**

#### **7.1 Staff Interpretations.**

The purpose of interpretations is to promote consistency in the application and understanding of the provisions of this document. Interpretations are occasionally needed to add further clarification to the requirements of these regulations. An interpretation of the American Lumber Standard Committee, Incorporated® (ALSC) Board of Review Enforcement Regulations may be obtained through the submission of a written request to the President.

(a) The written request shall identify the specific section of the Enforcement Regulations involved and shall set forth the facts and arguments supporting the request.

(b) The interpretation shall be made by the President or his designated staff person in writing.

(c) The interpretation of the President shall be distributed to all participants in the ALSC Program.

(d) In the absence of any request pursuant to Subsection 7.2, below, the interpretation shall be made part of the background documentation to the Enforcement Regulations

upon endorsement by the Enforcement Subcommittee and ratification by the ALSC.

#### **7.2 Enforcement Subcommittee Review.**

Within 30 days of the distribution of the interpretation, the requestor or any participant may submit a written request for review by the Enforcement Subcommittee, including the grounds of disagreement with the interpretation. At the discretion of the chair, the Subcommittee will consider the request at a meeting or telephone conference at which the requestor may make additional presentations. The Subcommittee may accept, reject, or make changes in the interpretation.

#### **7.3 Appeals to the ALSC.**

(a) The requestor or any participant in the program who has filed a request pursuant to Subsection 7.2, and who finds the ruling of the Enforcement Subcommittee unacceptable, may appeal the ruling to the ALSC. Such request for appeal must be submitted in writing no later than 30 days after the date of the Enforcement Subcommittee's minutes being published and must specify the grounds for the appeal. The appeal shall be considered at the next meeting of the ALSC or, in the discretion of the Chairman, in a special telephone conference. All interested parties will be allowed the opportunity to make further presentations at the meeting or call.

(b) If a majority of the ALSC does not approve the recommendation of the Enforcement Subcommittee, the matter shall be either (i) referred back to the Enforcement Subcommittee for further consideration, or (ii) revised by the ALSC.

#### **7.4 Interpretation Records**

A complete record of all interpretations and committee actions on interpretations shall be maintained at the offices of the ALSC and shall



be fully available upon written request to the ALSC President.

## 8. HEAT CHAMBER

This section establishes minimum criteria to be used by agencies to verify that equipment and heat treating schedules meet the minimum time and temperature requirements of the IPPC standard.

Heat Chamber is defined as any enclosed equipment used to heat treat lumber or wood packaging material and includes kiln, heat boxes, or any other apparatus used to heat treat the product.

### a) Initial qualification of a facility

**1)** Agencies shall verify the accuracy of temperature measuring and recording devices in the heating chamber. Agencies shall require that thermocouple(s) be located to accurately measure the temperature achieved in the heat chamber and that an appropriate number of thermocouples are utilized given the chamber configuration.

**2)** Agencies shall conduct a verification study for heat treating chambers and heat treating schedules when any of the following conditions are present:

- i)** except for Option C of CFIA PI-07, heating chambers using only dry heat which utilize one or more schedules that do not maintain an operating temperature of 160° F (71° C) or greater (not including ramping temperatures);
- ii)** heating chambers using both dry and wet heat (steam) which utilize one or more schedules that do not maintain a wet bulb operating temperature of 140° F (60° C) or greater (not including ramping temperatures).
- iii)** Heat treat chambers utilizing no set schedule, but instead using thermocouples inserted directly into wood which do not maintain a core tempera-

ture of 140°F (60° C) or greater.

The verification study shall employ an appropriate number of thermocouples to accurately measure the temperature conditions in the chamber and the wood to assure the time and temperature requirements for heat treating are met. Any equipment variance of more than plus or minus 5° F (2.8° C) must be recalibrated or replaced.

The verification study shall be maintained at both the agency and the facility locations.

### b) Monitoring

**1)** Agencies shall require facilities to monitor temperatures throughout the heat treatment cycle by any of the following options:

- i)** wet and dry bulb temperature
- ii)** dry bulb only - unless the specific schedule has been verified, required heating times shall be equal to or greater than the time specified for the applicable schedule assuming the maximum wet bulb depression as provided in either:
  - a) FPL-RP-607 "Heat Sterilization Time of Ponderosa Pine and Douglas Fir Boards and Square Timbers"; or
  - b) FPL-RP-604 "Effect of Wet Bulb Depression on Heat Sterilization Time of Slash Pine Lumber"; or
  - c) CFIA PI-07 "The Technical Heat Treatment Guidelines and Operating Conditions Manual" Option C.
- iii)** direct measurement of wood core temperature of the thickest piece(s) by use of thermocouple(s) properly sealed with non-conductive material. The number of thermocouples in use shall be determined by the agency's initial qualification of the facility or any subsequent verification study. All thermocouples in use must meet heat treat requirements unless the chamber in question utilizes duplication of thermo-

couples to account for failures of the thermocouples to record, or to record accurately, during the heat treat cycle. Duplication shall employ the use of thermocouples in a manner which allows for close comparative measurement of temperature between the thermocouples in question. Evaluation of the effectiveness of duplication shall be judged from similar charges where all thermocouples recorded properly. Failure of thermocouples to record, or failures to adequately duplicate recording of a malfunctioning thermocouple, or failure to have comparative charges shall call into question heat treating results for the affected charges. Any charge(s) determined to not meet heat treat requirements shall not be quality marked unless properly re-heat treated.

**2)** Agencies shall require that facilities subject to the requirements of 8.a.2, annually calibrate the temperature monitoring and recording equipment for each facility HT chamber.

**3)** Agencies shall require facilities subject to the requirements of 8.a.2 to requalify a heat treating chamber any time there is a major change in equipment or remodeling of the HT chamber.

**4)** Except in the case of 8.b.1.iii, when wood moisture content is not determined at the beginning of the HT cycle, agencies shall require that facilities select and use appropriate time-temperature schedules assuming the lowest initial wood moisture content from one of the following publications:

- i)** FPL-GTR-130 "Heating Times for Round and Rectangular Cross Sections of Wood in Steam";
- ii)** FPL-RP-607 "Heat Sterilization Time of Ponderosa Pine and Douglas Fir Boards and Square Timbers"; or
- iii)** FPL-RP-604 "Effect of Wet Bulb Depression on Heat Sterilization Time

of Slash Pine Lumber"; or

**iv)** CFIA PI-07 "The Technical Heat Treatment Guidelines and Operating Conditions Manual" Option C.

## **9. ADDITIONAL PROCEDURES**

**9.1** Additional procedures for this wood packaging program shall be adopted as needed by the American Lumber Standard Committee.

## **10. CONSTRUCTION**

**10.1** These regulations shall be construed and interpreted so as to conform with the ALSC Wood Packaging Material Policy (Policy) dated November 8, 2013.