



**COMPLIANCE  
FOR DEFENSE PACKAGING:  
Phytosanitary Requirements for  
Wood Packaging Material (WPM)**

**September 7, 2007**

**Office of the Deputy Under Secretary of Defense  
(Logistics and Materiel Readiness)**

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FOREWORD

This Manual is issued under the authority of DoD Directive 4140.1, "Supply Chain Materiel Management Policy," April 2004 (Reference (a)), and in accordance with DoD 4140.1-R, "DoD Supply Chain Materiel Management Regulation," May 2003 (Reference (b)). Its purpose is to provide guidance on the implementation of procedures for uniform compliance with international agreements on cross border flows of "Pest Free" wood packaging materials.

The Deputy Under Secretary of Defense for Logistics and Materiel Readiness Memorandum, "European Community (EC) Decision on the Entry of Non-Manufactured Wood Products into Europe," September 8, 2001 (Reference (c)), and the Deputy Under Secretary of Defense for Logistics and Materiel Readiness Memorandum "Interim Policy on Phytosanitary Measures for Wood Packaging Materials (WPM) Transiting International Borders" February 13, 2006 (Reference (d)), are hereby canceled.

This Manual applies to the Office of the Secretary of Defense, the Military Departments, the Office of the Chairman of the Joint Chiefs of Staff, the Combatant Commands, the Office of the Inspector General of the Department of Defense, the Defense Agencies, the DoD Field Activities, and all other organizational entities within the Department of Defense (hereafter referred to collectively as "the DoD Components"). The term "Military Services," as used herein, refers to the Army, Navy, Air Force, and Marine Corps.

This Manual is effective immediately and is mandatory for use by all DoD Components. Send recommended changes to this Manual through Service and Agency channels to:

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The monthly reporting requirements prescribed by the Manual have been assigned Report Control Symbol (RCS) DD-AT&L (M) 2285. The reports of audits are exempt from licensing in accordance with paragraph C4.4.7. of DoD 8910.1-M (Reference (e)).

This Manual is available for download via the Worldwide Web at <http://www.dtic.mil/whs/directives>.

  
Jack Bell

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## REFERENCES

- (a) DoD Directive 4140.1, "Supply Chain Materiel Management Policy," April 22, 2004
- (b) DoD 4140.1-R, "DoD Supply Chain Materiel Management Regulation," May 23, 2003
- (c) Memorandum from the Deputy Under Secretary of Defense for Logistics and Materiel Readiness, "European Community (EC) Decision on the Entry of Non-Manufactured Wood Products into Europe," September 8, 2001 (hereby canceled)
- (d) Memorandum from the Deputy Under Secretary of Defense for Logistics and Materiel Readiness, "Interim Policy on Phytosanitary Measures for Wood Packaging Materials (WPM) Transiting International Borders," February 13, 2006 (hereby canceled)
- (e) DoD 8910.1-M, "DoD Procedures for Management of Information Requirements," June 30, 1998
- (f) International Standards for Phytosanitary Measures (ISPM 15), Guidelines for Regulating Wood Packaging Material in International Trade, Food and Agriculture Organization of the United Nations (FAO), Rome (2002), with modifications to Annex I (2006)<sup>1</sup>
- (g) International Standards for Phytosanitary Measures (ISPM 05), Glossary of Phytosanitary Terms, Food and Agriculture Organization of the United Nations (FAO), March 2007<sup>2</sup>
- (h) Joint Service Instruction, DLAI 4145.4/AR 740-3/AFMAN 23-231/NAVSUPINST 4400.100/MCO 4450.15, "Stock Readiness," January 6, 2003
- (i) Title 7 Code of Federal Regulations part 319.40<sup>3</sup>
- (j) Memorandum of Agreement (No. 06-8100-1012-MU) between the United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) Plant Protection and Quarantine (PPQ) and the United States Department of Defense (DoD), November 16, 2005<sup>4</sup>
- (k) United States Department of Agriculture's (USDA) Rule for Imported Wood Packaging Material, September 16, 2004<sup>5</sup>
- (l) American Lumber Standards Committee, Incorporated (ALSC), "Wood Packaging Policy," November 15, 2002<sup>6</sup>
- (m) National Wooden Pallet and Container Association (NWPCA), "Export Wood Packaging Material Fumigation Policy," August 2005<sup>7</sup>
- (n) Joint Service Instruction/Regulation DLAI 4140.55/AR 735-11-2/SECNAVINST 4355.18A/AFMAN 23-215 "Reporting of Supply Discrepancies," August 6 2001
- (o) American Lumber Standards Committee Incorporated (ALSC), "Wood Packaging Material Enforcement Regulations," October 27, 2006<sup>8</sup>
- (p) Defense Transportation Regulations (DTR)<sup>9</sup>

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<sup>1</sup> Can be found at <https://www.ippc.int/IPP/En/default.jsp>

<sup>2</sup> Can be found at <https://www.ippc.int/IPP/En/default.jsp>

<sup>3</sup> Can be found at <http://www.gpoaccess.gov>

<sup>4</sup> Can be found at <http://www.aphis.usda.gov>

<sup>5</sup> Can be found at <http://www.aphis.usda.gov>

<sup>6</sup> Can be found at <http://www.alsc.org>

<sup>7</sup> Can be found at <http://www.nwpc.com>

<sup>8</sup> Can be found at <http://www.alsc.org>

<sup>9</sup> Can be found at <http://www.transcom.mil>

## DEFINITIONS

DL1.1. American Lumber Standard Committee (ALSC). The ALSC, comprised of manufacturers, distributors, users, and consumers of lumber, serves as the standing committee for the American Softwood Lumber Standard - (Voluntary Product Standard (PS) 20) and in accordance with PS 20, administers an accreditation program for the grade marking of lumber produced under the system. The ALSC also administers accreditation programs for the quality marking of treated lumber produced under standards written and maintained by the American Wood Preserver's Association (AWPA) and for the labeling of wood packaging material produced under International Standards for Phytosanitary Measures (ISPM 15),(Reference (f)).

DL1.2. Auditor. A trained, independent, and impartial auditor assigned by the WPM site commander/manager.

DL1.3. Bark-Free Wood. Wood from which all bark excluding the vascular cambium, ingrown bark around knots, and bark pockets between rings of annual growth has been removed (International Standards for Phytosanitary Measures (ISPM No. 5) (Reference (g))).

DL1.4. Dunnage. Wood packaging material used to secure or support a commodity but which does not remain associated with the commodity (Reference (g)).

DL1.5. International Plant Protection Convention (IPPC). An international treaty relating to plant health, to which 157-plus governments, including the United States of America., currently adhere. Its main purpose is to secure action to prevent the spread and introduction of pests of plants and plant products, and to promote appropriate measures for their control.

DL1.6. International Standard for Phytosanitary Measure (ISPM). An international standard adopted by the Conference of Food and Agriculture Organization (FAO), the Interim Commission on Phytosanitary measures or the Commission on Phytosanitary measure, established under the IPPC (Reference (g)).

DL1.7. National Wooden Pallet & Container Association (NWPCA). The international trade association that represents manufacturers, recyclers, and distributors of pallets, containers, and reels.

DL1.8. Phytosanitary. Plant health including the protection of natural flora and plant products. It also includes both direct and indirect damage by pests.

DL1.8.1. Phytosanitary Measure. 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 (Reference (g)).

DL1.8.2. Phytosanitary Procedure. Any official method for implementing phytosanitary measures including the performance of inspections, tests, surveillance, or treatments in connection with regulated pests (Reference (g)).

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DL1.8.3. Phytosanitary Regulation. Official rule to prevent the introduction and/or spread of quarantine pests, or to limit the economic impact of regulated non-quarantine pests, including establishment of procedures for phytosanitary certification (Reference (g)).

DL1.9. Processed Wood Material. Products that are a composite of wood constructed using glue, heat and pressure, or any combination thereof (Reference (g)). Examples include plywood, particleboard, oriented strand board (OSB), veneer, wood wool, etc.

DL1.10. Remediation. To provide remedial aid.

DL1.11. Site Custodian. A trained local individual within the packaging or WPM fabrication areas assigned by the DoD-certified WPM site commander as the commander's WPM responsible representative.

DL1.12. Stock Readiness. A DoD program involving the tasks needed to assure that the proper condition of material in storage is known and reported, that the condition is properly recorded, and that the material is properly provided with adequate packaging protection to prevent any degradation to lower condition codes in accordance with Joint Service Instruction, DLAI 4145.4/AR 740-3/AFMAN 23-231/NAVSUPINST 4400.100/MCO 4450.15, (Reference (h)). This program:

DL1.12.1. Monitors the in-storage inspection, minor repair, testing, exercising of material, and packaging aspects associated with these efforts.

DL1.12.2. Includes the elements of Care of Supplies in Storage (COSIS) (plus the functions related to the receipt, identification, classification, and packaging of material during the receipt process).

DL1.12.3. Excludes those actions that fall under the area of general warehouse care and depot maintenance, including the use of proper storage aids, identification of material/storage locations, and re-warehousing actions.

DL1.13. Wood Packaging Material (WPM). Non-Coniferous (Hardwood) and Coniferous (softwood) packaging material used in supporting, protecting, or carrying a commodity (includes dunnage). Examples of WPM include but are not limited to pallets, skids, pallet collars, containers, crates, boxes, cases, bins, reels, drums, load boards, and dunnage. Wood packaging made of exempt materials but combined with solid wood components must still be treated and marked. Does not include processed wood materials and manufactured wood products. (WPM was previously known as Non-Manufactured Wood Packaging or Solid Wood Packaging Material.)

DL1.14. WPM Component Point of Contact (POC). The Component's representative to the Defense Packaging Policy Group (DPPG).

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DL1.15. WPM Program Manager. A DoD component identified subordinate command WPM representative responsible for WPM compliance program in their command. If no subordinate representative is assigned, duties revert to the WPM Component POC.

DL1.16. WPM Compliance. Satisfying the intent and provisions of ISPM 15 guidelines of March 2002, as implemented by the United States (part 319.40 of title 7, Code of Federal Regulations (Reference (i))), U.S. allies, and other friendly governments.

ACRONYMS

Air Force Manual	AFMAN
American Lumber Standard Committee	ALSC
Animal and Plant Health Inspection Service	APHIS
Army Regulation	AR
American Wood Pallet Association	AWPA
U.S. Customs and Border Protection	CBP
Continental United States	CONUS
Care of Supplies in Storage	COSIS
Code of Federal Regulations	CFR
Department of Homeland Security	DHS
Defense Logistics Agency Instruction	DLAI
Department of Defense Activity Address Code	DoDAAC
Department of Defense	DoD
Defense Packaging Policy Group	DPPG
Defense Transportation Regulation	DTR
Defense Transportation System	DTS
European Union	EU
Food and Agriculture Organization	FAO
Government Owned, Contractor Operated	GOCO
Heat Treated	HT
International Merchants Purchase Authorization Card	IMPAC
International Plant Protection Convention	IPPC
International Standard for Phytosanitary Measure	ISPM
Kiln Dried	KD
Methyl Bromide	MB
Marine Corps Order	MCO
Naval Supply Systems Command Instruction	NAVSUPINST
National Institute of Packaging, Handling and Logistic Engineers	NIPHLE
Non-Manufactured Wood Packaging	NMWP
National Plant Protection Organization	NPPO
National Stock Number	NSN
National Wooden Pallet and Container Association	NWPCA
Oriented Strand Board	OSB
Point of Contact	POC
Plant Protection and Quarantine	PPQ
Supply Discrepancy Reports	SDR
Unit Identification Code	UIC
United Nations	UN
United States Department of Agriculture	USDA
United States Transportation Command	USTRANSCOM
Wood Packaging Material	WPM

## C1. CHAPTER 1

### GENERAL INFORMATION

#### C1.1. PURPOSE

Phytosanitary requirements for WPM have been imposed by the Food and Agriculture Organization (FAO) of the United Nations (UN) to protect forests worldwide against pest infestation. The concern is that non-manufactured WPM may contain pests from the forest where it was grown and may spread pest or destruction outside the originating country. The Department of Defense and its Components engaged in packaging of material for transnational shipments shall comply with the procedures explained in this manual in order to gain access to aerial and water ports. If these procedures are not followed, there is a strong risk that the improperly marked and/or untreated material will become frustrated cargo.

#### C1.2. COMPLIANCE

This manual is issued as the DoD WPM procedures to implement the Memorandum of Agreement between the United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) Plant Protection and Quarantine (PPQ) and the United States Department of Defense (Reference (j)), which are an integral part of the USDA's Rule for Imported Wood Packaging Material (Reference (k)). Reference (f) establishes worldwide standards for WPM and mandate actions to prevent the introduction and/or spread of forest pests and promotes measures for control. This manual replaces guidance issued in References (c) and (d).

#### C1.3. GOAL

The DoD Components shall actively promote, implement, monitor, and measure procedures explained in this manual to ensure the elimination of "pests" using WPM as a host. As such, the intent is to treat, test, or phase-out all non-compliant WPM inventory over time. WPM includes pallets, crates, boxes, reels, dunnage, frames, and cleats composed of non-manufactured wood. WPM made of exempt materials but combined with solid non-manufactured wood components must still be treated and marked. Manufactured (processed) wood products are not affected (for example, plywood, particle board, oriented strand board (OSB) and veneers) thus do not require to be treated and marked. Additionally, pieces of wood that are less than 6 mm (0.24 inches) in any dimension are not affected.

C1.3.1. DoD Components are responsible for working in concert with the international community, USDA/APHIS, and other key agencies in meeting the intent of Reference (f).

C1.3.2. Sources, shippers, and receivers in the DoD Component's supply chain shall identify, replace, and remediate non-compliant WPM.

## C2. CHAPTER 2

### SUPPLY CHAIN PROCESS

#### C2.1. PROCUREMENT

DoD Components shall procure WPM compliant with Reference (f), the American Lumber Standard Committee (ALSC) Wood Packaging Policy, Reference (l), and the National Wooden Pallet and Container Association (NWPCA) (Reference (m)) guidelines on WPM implementation of ISPM 15 standards in the United States and its Territories. The DoD Components shall ensure all WPM is procured within the ISPM 15 guidelines for shipments to any country or for packaging material stored at Defense depots. Compliant non-manufactured WPM is marked either heat treated or KD/HT (Kiln Dried and Heat Treated) as established by ALSC or treated with methyl bromide (MB) as established by NWPCA. The requirements in paragraphs C2.1.1. shall be met in every government solicitation for goods.

C2.1.1. Packaging Requirements. DoD Components shall ensure all new purchases of WPM meet the requirements of Reference (f), and the commercial heat treatment process approved by the American Lumber Standard Committee (ALSC) required for all WPM. WPM is defined as wood pallets, skids, load boards, pallet collars, wooden boxes, reels, dunnage, crates, frames, and cleats. Packaging materials exempt from the requirements are materials that have undergone a manufacturing process such as corrugated fiberboard, plywood, particleboard, veneer, and oriented strand board (OSB). All WPM shall be constructed from heat treated (treated to 56 degrees Celsius -core temperature- for 30 minutes) lumber and certified by an accredited agency recognized by the ALSC in accordance with Wood Packaging Material Policy and Wood Packaging Material Enforcement Regulations (see URL: <http://www.alsc.org>). All materials must include certification markings in accordance with Reference (f) certification and/or ALSC standards and be placed in an unobstructed area that will be readily visible to inspectors. Pallet markings shall be applied to the stringer or block on diagonally opposite sides and ends of the pallet and be contrasting and clearly visible. All dunnage used in configuring and/or securing the load shall also comply with ISPM 15 and be marked with an ALSC approved dunnage stamp.

C2.1.2. Contract Modification for Bulk Lumber. DoD components should review all existing contracts for the purchase of bulk lumber packaging and attempt modification to the above stated requirements if possible.

C2.1.3. International Merchant's Purchase Authorization Cards (IMPAC). The Department of Defense has issued directives concerning WPM compliance requirements for material procured by local purchases. IMPAC holders shall ensure that lumber and fabricated WPM is in compliance with the requirements herein.

C2.1.4. Vendor Order. When in the contract, vendors are mandated to ensure all ISPM 15 standard requirements have been met prior to shipping goods to the Government. Failure to meet contract requirements shall result in the material being rejected by the Government and

returned to the vendor. A Supply Discrepancy Report (SDR) shall be prepared in accordance with Joint Service Instruction/Regulation DLAI 4140.55/AR 735-11-2/SECNAVINST 4355.18A/AFMAN 23-215, (Reference (n)).

## C2.2. RECEIVING

The DoD Components shall monitor all incoming WPM. All incoming new procurements after 13 February 2006 must be ISPM-15 compliant. Retrograde items shall, as a minimum, comply with procedures in Appendix 3. A record shall be maintained for all discrepant receipts and an SDR prepared and forwarded to the shipping activity for corrective action and trend analysis.

C2.2.1. Inspection for Compliance. The following are required steps for inspecting WPM for compliance:

C2.2.1.1. Visually inspect incoming receipts for the ISPM 15 certification mark.

C2.2.1.2. If markings are not present, inspect according to DoD guidelines (see paragraph C2.3.1.).

C2.2.2. Report Non-Compliance. For shipments determined to be non-compliant, prepare an SDR per Reference (l). Cite discrepancy code P215 “Non-conformance to specified requirements for wood packaging material (WPM)” on the SF 364. Provide specific non-compliant information in the remarks section. Complete an SF 1080, “Voucher for Transfers between Appropriations and/or Funds.” If possible, attach photographic evidence in order to substantiate the claim for the recoupment of funds expended in bringing the shipment into compliance.

### C2.2.3. Determine Disposition

C2.2.3.1. Compliant WPM Materials. If the reusable shipping and storage container is compliant, the container shall be utilized for return of approved items. Other compliant WPM shall be recycled and reused in local applications (i.e., packaging and shipping operations). Compliant WPM that cannot be recycled shall be disposed under host nation, state, and local laws and governing DoD or Military Service directives.

C2.2.3.2. Non-Compliant WPM Materials. Non-compliant WPM materials shall be disposed of as required under host nation, state, and local laws or treated by one of the two approved methods (see paragraphs C2.4.1.1. and C2.4.1.2.) to bring the WPM material into compliance.

C2.2.4. Local Service Contract for Disposition. In locations where the disposition of non-compliant WPM materials cannot be done, local service contracts shall be initiated for disposition of the material.

### C2.3. BRINGING EXISTING INVENTORY INTO COMPLIANCE

DoD Components shall prevent non-compliant WPM from entering the inventory. Inventory held by the DoD Activities that contain non-compliant WPM shall be brought into compliance by application of the ISPM 15 certification mark, by the most economic means, prior to entering the Defense Transportation System (DTS). Existing inventories of non-compliant WPM stock may be used only within the United States and its Territories until expended. The DoD “Pest Free” certification mark may only be used as outlined in Appendix 3. Inventories packaged with WPM shall be inspected for compliance in accordance with References (b) and (l):

C2.3.1. If the WPM is marked with ISPM 15 certification markings, it is ready for issue.

C2.3.2. If there are no ISPM 15 certification markings and prior to entering the DTS, the WPM will then either be remediated as discussed in paragraph C2.4. or it will be processed for “DoD Pest Free” certification as directed in Appendix 3.

### C2.4. REMEDIATION ACTIONS

The DoD Components shall remediate non-compliant WPM before it enters the DTS except when movement of the packaged materiel will only be within the United States and its Territories with no possibility of further movement (e.g., disposal shipment). Non-compliant WPM that can be reused shall be processed through a certified heat chamber. If circumstances preclude the use of a heat chamber, alternate processes meeting the requirements of section C2.4.1.2. may be used with prior approval. If reuse is not feasible, WPM shall be disposed of using environmentally safe methods. Repackaging and disposal costs associated with non-compliant WPM shall be the responsibility of the owner of the stock directing shipment (i.e., last identified shipper or item manager).

C2.4.1. Detailed Methods. At the remediation area, all non-compliant WPM shall be treated by one of the following approved methods or removed and replaced with compliant WPM. The DoD primary method of WPM compliance is Heat Treatment.

C2.4.1.1. Heat Treatment. In selected CONUS locations, the Department of Defense procures and operates Heat Treatment facilities for the treatment of non-compliant WPM. The USDA APHIS has given the responsibility for heat treatment compliance of the WPM ISPM 15 guidelines to ALSC. ALSC issued compliance regulations, “Wood Packaging Enforcement Regulations,” (Reference (o)), which are available through their Web site. When WPM is heat treated, the treating facility shall apply their designated/assigned ISPM 15 certification mark. The Department of Defense will not buy and process raw lumber through heat chambers. Raw lumber will be acquired as Heat Treated or KD/HT compliant. The heat chambers may only be used to process WPM identified as non-compliant into compliant WPM.

C2.4.1.1.1. WPM shall be heat treated to a minimum core temperature of 56 degrees Celsius for 30 minutes and marked as stated in paragraph C2.5.1. as heat treated.

C2.4.1.1.2. Any facility performing WPM heat treatment shall be audited by the ALSC member agency.

C2.4.1.1.3. The program has aggressive enforcement provisions that include warnings, suspension of ISPM 15 heat treatment marking services, and withdrawal of marking services for non-compliance.

C2.4.1.2. Fumigation. Fumigation is authorized for the treatment of WPM, although the Department of Defense does not recommend this option because the chemical is an ozone-depleting substance. The USDA APHIS has given the responsibility for fumigation compliance of the WPM ISPM 15 guidelines to NWPCA. The NWPCA Enforcement Committee issued a compliance memorandum (Reference (m)) which is available through their Web site. Approval to use fumigation must be obtained through the Service or Agency Senior Acquisition Official and the Component WPM Program Manager.

C2.4.1.2.1. Fumigation in the United States shall be performed by a licensed pesticide applicator following the U.S. Environmental Protection Agency approved label specification of the fumigant used.

C2.4.1.2.2. Methyl bromide is presently the only fumigant recognized for use.

C2.4.1.2.3. Fumigation at a location outside the United States and its Territories shall be in accordance with the Status of Forces Agreement of that member (host) nation and applied according to ISPM 15 fumigation schedule.

C2.4.1.2.4. Fumigated WPM shall be marked as stated in paragraph C2.5.1. as MB (Methyl Bromide).

C2.4.2. Return to origin. If the options in paragraphs C2.4.1.1. and C2.4.1.2. are not feasible, the shipment shall be returned to the shipper, at their expense, in accordance with carrier policies and procedures.

## C2.5. WPM CERTIFICATION MARKING

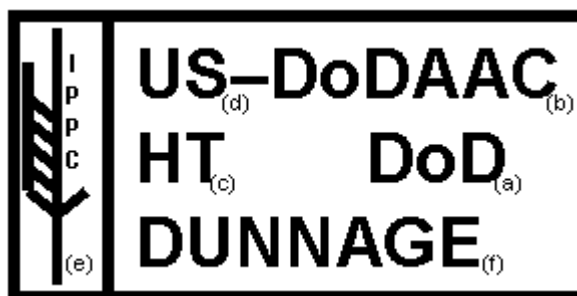
Certification markings shall allow easy identification of compliant WPM. DoD Components shall apply appropriate certification marking as required and defined herein. Certification marking shall be indelible and permanent. Markings may be stamped, stenciled, or branded directly onto or into the WPM. The mark shall be a contrasting color. The colors of red and orange are not authorized. Pallet certification markings shall be applied to the stringer or block on opposite sides or ends of the pallet and be clearly visible. Certification marks shall be applied 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. Dunnage certification markings shall be applied to opposite surfaces of each piece. If possible, the mark

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shall be visible when the dunnage is placed in the load to enable inspectors to verify the WPM's compliance without unloading or unstuffing the container.

C2.5.1. ISPM 15 Certification Marking. DoD Components that are self-certified or ALSC accredited are authorized to use ISPM 15 certification mark on all WPM that fully complies with ISPM 15 guidelines. The ISPM 15 certification marking (see Figure C2.F1.) shall display the letters "US" in bold (d), the packaging activity's Department of Defense Activity Address Code (DODAAC) (b), and either "HT" denoting heat treated WPM or "MB" denoting WPM "fumigated" with Methyl Bromide as noted in the Figure C2.F1. by "HT" (c). The marking "TRADEMARK" (a) represents the logo of the U.S. services that can be displayed under the DODAAC. The marking "DUNNAGE" (f) is used strictly for dunnage, otherwise it is left blank. Item (e) is the approved International symbol for compliant wood packaging material.

Figure C2.F1. ISPM 15 Certification Mark



C2.5.2. Applying ISPM 15 Certification Mark. ISPM 15 certification mark is applied when:

C2.5.2.1. DoD activities, self-certified per this manual or using an accredited host nation National Plant Protection Organization (NPPO) WPM service provider, assemble or build WPM in accordance with ISPM 15, recognized USDA APHIS, or host-nation NPPO recognized programs. Certified wood procured commercially and the containers, pallets, etc., constructed from that wood shall display ISPM 15 certification mark.

C2.5.2.2. DoD activities that construct or repair WPM products utilizing compliant wood acquired commercially shall mark the products they construct or replacement wood using their ISPM 15 certification mark, treatment code, and their DODAAC. This only applies to repairs if the entire original WPM product was in compliance with ISPM 15. (See Appendix 3.)

C2.5.2.3. All DoD activities that have procured and trained personnel to operate the wood heat treatment chamber or kiln to process WPM products to ISPM 15 standard shall be enrolled with and audited by approved ALSC or host-nation accredited agency. As part of the contract, the accredited agency furnishes that activity with the agency's ALSC or host-nation approved WPM stamp for certification purposes. If located on a non-U.S. or its territories site and the host nation does not have a NPPO or ISPM 15 WPM Program, the DoD activity shall

self-certify and mark lumber and WPM that has been treated in a heat treatment chamber or kiln with ISPM 15 heat treatment certification markings per U.S. requirements. Detailed records attesting to chamber operations must be maintained. These records include recorded temperatures monitoring (56° Celsius for 30 minutes, core temperature) of each treatment.

## C2.6. SHIPPING

The DoD Components shall inspect, treat, replace, or repack non-compliant WPM using the most economic solution that shall meet the required delivery date prior to shipment. When the shipper is unable to provide compliant WPM, the shipper shall subcontract for such services.

C2.6.1. Inspection. The origin shipping Activity (consignor) shall prepare cargo ensuring uninterrupted movement to the ultimate destination (consignee). The consignor shall inspect all WPM ensuring compliance with the guidelines herein. Cargo utilizing WPM shall not be released into the DTS prior to consignor verification of compliance.

C2.6.2. Determine Compliance Option. The DoD Components shall ensure 100 percent compliance with the measures and standards regarding shipments of WPM. If the consignor's inspection indicates the WPM is not in compliance with guidelines herein, the material shall not be offered for shipment. The shipper shall evaluate and select one of the remediation options in paragraph C2.4. to bring WPM into compliance. Reimbursement of funding used to bring WPM into compliance is the responsibility of the activity directing shipment of the item (e.g., inventory control point, owner).

C2.6.3. International Shipments. International requirements are enforced by individual member states (nations). Therefore, inspection criteria shall be dependent on the location of the member (host) nation's port of debarkation. If the member nation inspection procedures are published or documented, these shall be included in the appropriate section (by theater or individual country) of the Defense Transportation Regulations, Reference (n). If member nation inspectors frustrate shipments for non-compliant WPM, common practice (for customs and/or agriculture clearance problems) dictates the shipments be segregated and held pending determination of remedial action.

C2.6.4. Frustrated Shipments. In the event shipments are frustrated by a member state (nation), the carrier (military or commercial) shall notify the consignor (shipper) and/or consignee (addressee) to determine required actions. At this point, the Department of Defense shall exercise actions and/or options depending on the circumstances of the quarantined/frustrated shipment. The nearest DoD Component WPM certifying activity shall remediate frustrated shipments using appropriate means depending on circumstances, carrier policies/ procedures, and host-nation, state, or local requirements. Remediation costs shall be recouped from the last identified shipper of the material.

C2.6.5. Reports of Non-Compliance. Shipments frustrated by member states (nations) at the port of debarkation or any reports of non-compliance requiring intervention shall be reported to the Combatant Command and the owning DoD Component. If the level of

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frustrated shipments reaches an unacceptable level, the above shall notify the U.S. Transportation Command (USTRANSCOM) for further action.

### C3. CHAPTER 3

#### MANAGEMENT CONTROLS

The DoD Components shall report, audit, and enforce WPM standards and measures. The DoD Components shall maintain receipt, usage, certification marking, and reporting documentation for compliance purposes throughout the process and for 2 years subsequent to the date of WPM certification. The DoD Components shall audit, report, and enforce WPM standards and measures. Audit and/or enforcement shall include on-site inspections and may also include the use of a centralized DoD Web-based program. Each Activity certifying WPM shall be audited in accordance with the following DoD audit procedures.

#### C3.1. MONTHLY REPORTS

DoD Component activities shall provide monthly reports, coordinated through their chain-of-command, to the DoD centralized Web site or other Component specified reporting requirement. The reports must be posted to the DoD centralized Web site or are due as specified in the other Component specified reporting requirement within 2 weeks of the end of the reported month. Activities fabricating new WPM or repairing WPM with new heat treated certified lumber and applying ISPM 15 certification mark will track as a minimum:

C3.1.1. Lumber receipts including the receipt or requisition number, mill code, lumber NSN or identification number, lumber thickness, lumber width, lumber length, quantity received, and date of receipt. This information will be maintained at the activity level for verification during on-site audits.

C3.1.2. Lumber used including the cut and fabrication work order number or other approved document number, lumber NSN or identification number, lumber thickness, lumber width, lumber length, number of boards of each size used, and date of fabrication. This information will be maintained at the activity level for verification during on-site audits.

C3.1.3. A lumber usage report that identifies the lumber on hand at the beginning of the month, lumber received, lumber used, and final inventory of lumber on hand at the end of the month. This monthly roll up of lumber usage for ISPM 15 certification will be provided as specified in this section.

#### C3.2. AUDITS

To ensure correct and responsible use of ISPM 15 certification mark, DoD procedures to audit and inspect the DoD Certifying WPM program shall be observed. Audits complying with the DoD Certifying WPM program will be defined in each DoD Component's internal instruction. Required information for auditing is herein. The DoD WPM Web site provides on-line support. DoD audit procedures have been developed to effectively monitor, enhance, and

ensure compliance. Each DoD Component has the authority to elect an audit procedure identified below that is compatible with their requirements.

C3.2.1. Audit Methods. The DoD Components shall utilize one or more of the following methods for the auditing of their individual Service/Agency:

C3.2.1.1. Facilities fabricating WPM from treated raw lumber may be audited and approved through the U.S. program sanctioned by the USDA and administered by the ALSC.

C3.2.1.2. Facilities treating WPM shall be audited and approved through the U.S. program sanctioned by the USDA and administered by the ALSC or NWPCA.

C3.2.1.3. Audits conducted by the Component command inspectors or auditors shall conform to the intent of procedures and/or information used by the ALSC.

C3.2.1.4. Audits conducted using a combination of the DoD report program as outlined in paragraph C3.1. and on-site audits at major consolidation hubs, nodes, or sites. These audits shall be conducted using trained, independent, impartial inspectors. This option conforms to the procedures and/or information used by the ALSC. DoD Components electing this method shall comply with the following procedures:

C3.2.1.4.1. On-line Report Validation. Reports for DoD Activities authorized to apply the ISPM 15 certification mark shall be validated monthly.

C3.2.1.4.1.1. Each reporting Activity shall register their DODAAC /UIC and site custodian via the Web site.

C3.2.1.4.1.2. Each validating Activity shall register their DODAAC /UIC and WPM Program Manager via the Web site.

C3.2.1.4.1.3. The WPM Program Manager or DoD Component point of contact (POC) shall validate the monthly reports. (See paragraph C3.1.)

C3.2.1.4.2. On-Site Audits. Trained auditors shall perform annual on-site audits.

C3.2.1.4.2.1. Auditors shall physically inspect DoD-Certified material stamped or stenciled with ISPM 15 certification mark to ensure compliance.

C3.2.1.4.2.2. Auditors shall document discrepancies and compliance data on line or forward to the WPM Program Manager or Component POC for comparison with on-line or collected report verification data.

C3.2.1.4.2.3. Auditors shall review the records of all incoming lumber, outgoing WPM, and shipments containing WPM ensuring compliance.

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C3.2.1.4.2.4. Auditors shall review personnel training records verifying workers involved with WPM have successfully completed the DoD Web based training course. (See paragraph C3.6.)

C3.2.1.4.2.5. Auditors shall ensure proper control of the certification marking devices.

C3.2.1.4.2.6. Auditors shall provide detailed reports of the audit and status of the DoD WPM Program through their chain-of-command WPM POCs to their DoD Component WPM POC.

### C3.2.2. Consequences of Audit Failure/Non-Compliance

C3.2.2.1. Commercial and Component Activities repairing or fabricating WPM to ALSC/NWPCA requirements shall receive warnings, suspensions, and withdrawal of ALSC quality stamp marking privileges for non-compliance as specified in ALSC/NWPCA enforcement regulations.

C3.2.2.2. At DoD site-certified WPM Activities, audit failures (non-conformance to WPM requirements at an aerial or shipment port, or Consolidation and Containerization Point (CCP)) or reported and validated shipping discrepancies shall apply the following process:

C3.2.2.2.1. First Audit Failure/Reported Non-Compliance. After notification of an audit failure, the site custodian shall:

C3.2.2.2.1.1. Within 15 days provide written analysis of the problem and proposed solution to the responsible auditing organization and to the WPM Component POC.

C3.2.2.2.1.2. Request a re-audit within 30 days to determine if process improvements have been implemented and are sufficient to resolve the discrepancy.

C3.2.2.2.2. Second Audit Failure/Reported Non-Compliance. An audit failure within 30 days of the first audit failure:

C3.2.2.2.2.1. Within 15 days of the second failure, provide written analysis of the problem and proposed solution to the responsible auditing organization and to the WPM Component POC.

C3.2.2.2.2.2. Within 30 days, the site shall be re-audited by the WPM Program Manager or WPM Component POC to determine if process improvements have been implemented and are sufficient to resolve the discrepancy.

C3.2.2.2.3. Third Audit Failure/Reported Non-Compliance. Another audit failure within 60 days of the first audit failure:

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C3.2.2.2.3.1. If the breakdown is the result of a failure to maintain required documentation or to contract for the delivery of the proper WPM, the DoD site certification may be withdrawn. If certification is withdrawn, then the facility shall contact ALSC for monthly commercial inspections, contract with a local ALSC operation, or send material to another DoD self-certified site. The facility shall be responsible for all costs associated with actions from a third failure.

C3.2.2.2.3.2. If the failure is related to the shipment of defective packaging, the installation/shipper shall be responsible for repack costs and/or the demurrage costs; all installation personnel shall have their certifications removed and shall be required to retake the WPM certification on-line training prior to being authorized to use the permanent mark.

C3.2.2.2.3.3. After 1 year, the site may reapply for DoD site re-certification. All wood fabricators/packers shall retake the individual certification test for site wood packaging re-certification.

### C3.3. DoD SITE CERTIFICATION

Each DoD Component is responsible for developing, promulgating, and performing an annual audit of its self-certified WPM sites to ensure that each meets USDA APHIS requirements or this plan. As a minimum, the DoD-certified WPM site commander shall:

C3.3.1. Establish and appoint in writing a WPM site custodian at each local certified site. The site custodian shall be responsible for maintaining WPM data for audit purposes.

C3.3.2. Maintain records of individuals who passed the DoD WPM training on the WPM Web site.

C3.3.3. Maintain documents pertaining to the number of ISPM 15 certification marking devices in the custody of the location.

C3.3.4. Maintain records of ISPM 15 certification mark information. The records shall include a copy of the DoD Component specific WPM implementation guidelines. Additionally, maintain any records of corrective actions taken in response to reported WPM audit failures or discrepancies developed against the site by an audit, shipping, or receiving activity.

C3.3.5. Maintain accurate records as required by paragraph C.3.1.

### C3.4. DOCUMENT RETENTION

WPM records and other documents or records as specified by the DoD Component shall be retained at each certified site for a period of not less than 2 years.

### C3.5. COMMUNICATION

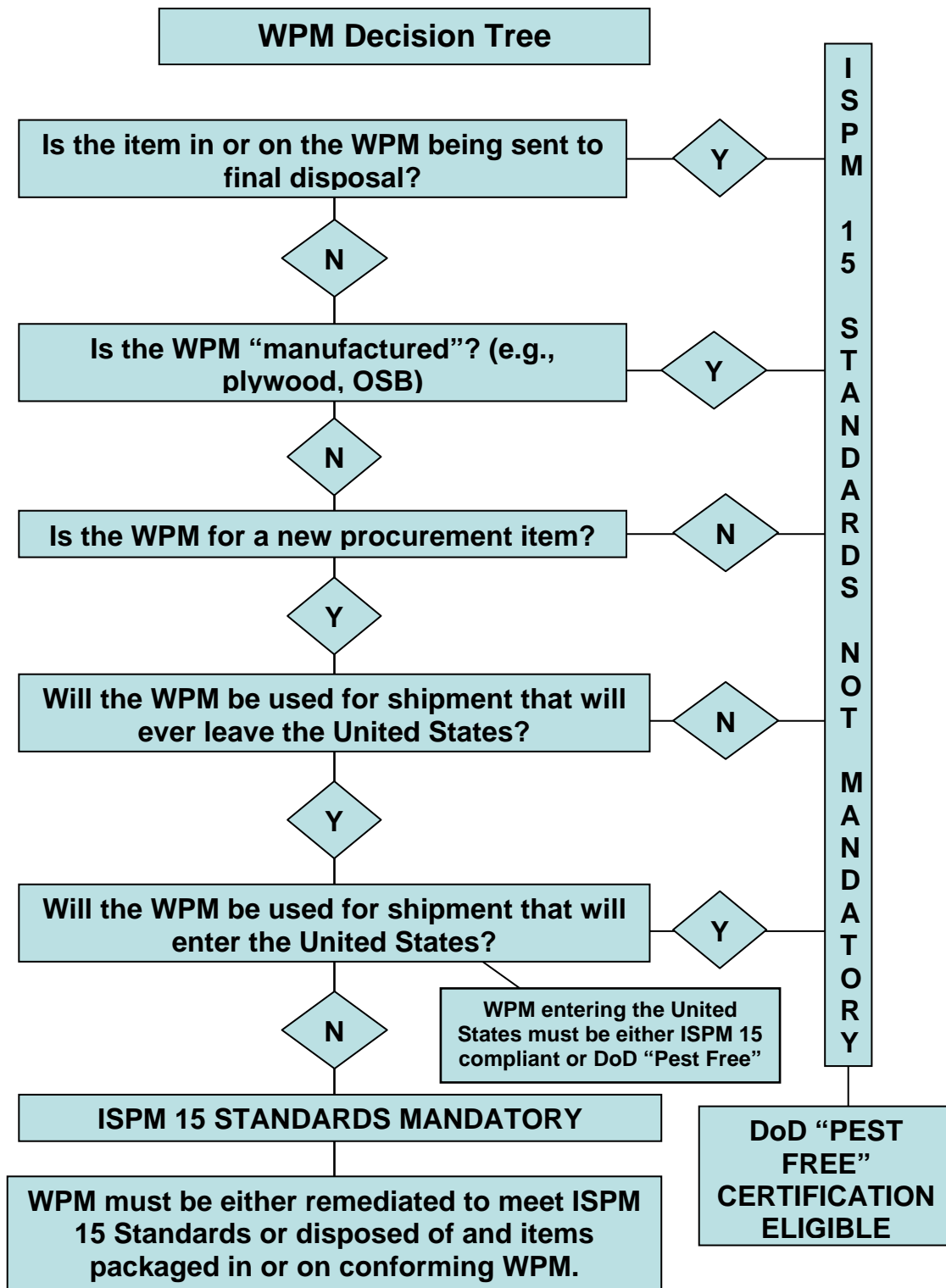
Awareness of changes requires a dedicated communication effort. Wide dissemination of information regarding the WPM program is critical to increase understanding of the importance of measures and standards. This continuing information dissemination ensures personnel are aware of the problem, the changes required, and the appropriate remediation measures needed for compliance. Communication is paramount to the success and integrity of the DoD WPM compliance program.

### C3.6. TRAINING

The DoD Components shall utilize the DoD comprehensive WPM Web based training course. The site address is: [https://www.icptarp.net/wpm/wpm\\_training.nsf](https://www.icptarp.net/wpm/wpm_training.nsf). It is available to all Services, Military, DoD civilian, and contractor personnel operating Government Owned, Contractor Operated (GOCO) facilities. The course addresses and provides self-certification and familiarization training. Personnel shall retake the training once every 2 years. This practice shall ensure inspectors, packers, wood fabricators, and assemblers stay current with IPPC, USDA/APHIS, and DoD WPM policy and procedural changes.

AP1. APPENDIX 1

DECISION TREE



AP2. APPENDIX 2

AUDIT INSPECTION GUIDE FOR

PHYTOSANITARY REQUIREMENTS FOR WOOD PACKAGING MATERIAL (WPM)

COMPLIANCE

AP2.1. INTRODUCTION

These are the minimal compliance inspection items that apply to all DoD components WPM fabrication and shipping activities. Inspectors shall use the checklist below to determine the level of compliance, assigning “Yes or No” to each checklist item. Please include brief comments explaining why each “No” response was assigned and any additional comments the inspector believes may be of value to the sponsor. Each DoD Component may have additional WPM audit items that reflect Component specific requirements.

AP2.2. INSPECTION CHECKLIST

1. [NONCRITICAL] Does the site custodian have access to the most current WPM policy and procedural guidance? (Paragraph C3.6. of this manual.)
2. [CRITICAL] Are the WPM certification stamps secured and only being used by personnel that have successfully completed the DoD Web based training course? (Paragraph C3.2.1.4.2.4. of this manual.)
3. [CRITICAL] Does the organization have procurement documentation for the last 2 years showing that all lumber procured by the organization was certified heat-treated lumber? (Paragraph C3.1.1.1. of this manual.)
4. [CRITICAL] Does the organization have work orders or other approved documentation for the last 2 years showing the amount of board feet used? (Paragraph C3.1.1.2. of this manual.)
5. [CRITICAL] For each month, during the last 12 months, is the amount (in board-feet) of certified heat- treated wood used equal to or less than the amount (in board-feet) of procured plus on-hand certified heat-treated wood? (Paragraph C3.1.1.3. of this manual.)

## AP3. APPENDIX 3

### DoD "PEST FREE" COMPLIANCE PROCEDURES

#### AP3.1. PURPOSE

There are two purposes for these procedures. They are:

AP3.1.1. The DoD "Pest Free" inspection process and certification marking is accepted by USDA APHIS and U.S. Customs and Border Protection (CBP) of the Department of Homeland Security (DHS) for imports into continental United States (CONUS) of retrograde materiel packaged in/on WPM. This certification process is only to be used for imports back into CONUS. The process is for temporary and emergency situations and may not preclude the establishment of a compliance program. The DoD "Pest Free" process is to be used: when there are no established host nation ISPM 15 programs, when there are austere conditions, when the deploying force will occupy the location for a limited time (less than 180 days), when the WPM brought with the deploying force will be returning directly to CONUS, or when importing back into CONUS existing WPM stored at an OCONUS location with a valid date of pack earlier than December 31, 2007.

AP3.1.2. Until December 31, 2007, the DoD "Pest Free" inspection process and certification marking is an interim exemption only for WPM shipments into and among the European Community nations. These nations, initiators of WPM phytosanitary treatment and markings, allowed the U.S. Department of Defense time to either use or methodically and cost effectively repackage materiel in long-term storage into acceptable WPM. The DoD "Pest Free" certification mark cannot be applied to DoD WPM having a date of pack later than December 31, 2007, per European Community notification to the World Trade Organization. After December 31, 2007, all DoD WPM shipped into or among European Community member nations must meet ISPM 15 requirements, as the DoD "Pest Free" certification mark will no longer be an acceptable export shipment marking for WPM compliance. Existing DoD WPM inventory that is repaired using compliant wood and that is unmarked or marked with the unique DoD "Pest Free" certification mark indicating that it has been moisture tested and visually inspected for specific defects (e.g., bark free, bore hole sizes to be less than 3 mm, insect free) shall NOT be marked with the ISPM 15 certification. This is to avoid the appearance that the WPM product is totally compliant with the ISPM 15 guidelines. (See C2.5.1.2.)

#### AP3.2. CERTIFICATION

Under the two conditions in paragraph AP3.1., existing stock, packaged within or residing on WPM, with a valid pack date prior to December 31, 2007, and not in compliance with ISPM 15 standard, may be eligible for certification. DoD Activities will use the following procedures to determine the suitability of noncompliant WPM for DoD "Pest Free" certification and markings.

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AP3.2.1. If the pack date is less than 5 years and is not packaged in compliant WPM, it shall be inspected to ensure the WPM is bark free, contains no bore holes larger than 3mm, the moisture content is less than 20 percent, and no evidence of other insect infestations are present..

AP3.2.2. If the pack date is 5 years or older, it shall be inspected ensuring the WPM is bark free, contains no bore holes larger than 3mm, and has no evidence of insect infestation.

AP3.2.3. All inspection criteria shall be met or the packaging is considered non-compliant and remedial action shall be performed in accordance with paragraph C2.4.

AP3.2.4. When packaging is inspected and determined to be in compliance with the criteria in AP3.2.1. through AP3.2.3., it shall be marked as such using the DoD “Pest Free” mark as stated in paragraph AP3.3.

### AP3.3. MARKING

DoD “Pest Free” Certification Marking. Certification and application of the DoD “Pest Free” certification marking (see Figure AP3.F1) is authorized if the material successfully passes the established moisture and visual inspection standards (see paragraph AP3.2.) and has a valid date of pack prior to December 31, 2007. The DoD “Pest Free” certification mark shall display the letters “DoD,” the words “Certified Pest Free,” and the DODAAC of the packaging or shipping activity. The DODAAC provides identification. (See Figure AP3.F1.)

Figure AP3.F1. DoD “Pest Free” Certification Mark



### AP3.4. MONTHLY REPORTS

In addition to the reports specified in paragraph C3.1., DoD Component activities using the DoD “Pest Free” certification will maintain records of certified material by documenting the following information: requisition or transportation control number, item national stock number (NSN), moisture reading, visually inspected for boreholes larger than 3 mm in diameter and bark-free (Yes/No), quantity and type of WPM marked, inspector's signature verifying WPM meets DoD requirements and WPM is properly marked, and the date of certification. This information will be maintained at the activity level for verification during

on-site audits. A monthly roll up of the number of instances, type, and quantity of WPM certified DoD “Pest Free” will be provided with the other WPM reports as specified in paragraph C3.1.

#### AP3.5. AUDITS

In addition to the audit procedures in paragraph C3.2., DoD Component activities using the DoD “Pest Free” certification will follow all the requirements for DoD self-certifications as well as the methods for auditing their Individual Service/Agency.

AP3.5.1. On-line Report Validation. Reports for DoD Activities authorized to apply the DoD “Pest Free” certification mark shall be validated monthly using the current WPM Standards.

AP3.5.2. On-Site Audits. Trained auditors shall perform annual on-site audits. Auditors shall:

AP3.5.2.1. Physically inspect DoD Certified material stamped/stenciled with DoD “Pest Free” certification mark to ensure compliance.

AP3.5.2.2. Document discrepancies and compliance data on line or forward to the WPM Program Manager or Component POC for comparison with on-line/collected report verification data.

AP3.5.2.3. Review the records of all shipments containing WPM ensuring compliance.

AP3.5.2.4. Review personnel training records verifying workers involved with WPM have successfully completed the DoD Web-based training course.

AP3.5.2.5. Ensure proper control of the certification stamps.

AP3.5.2.6. Provide detailed reports of the audit and status of the DoD WPM Program through their chain-of-command WPM POCs to their DoD Component WPM POC.

AP3.5.3. Checklist. The following checklist item will be added to the checklist found in Appendix 2.

6. [CRITICAL] Does each shipment inspected, certified, and marked with the DoD “Pest Free” certification mark have the following documented:

1. National Stock Number (NSN)
2. Quantity of WPM by type
3. Transportation Control Number (TCN) or Requisition Number
4. Tested Moisture Percentage (if required)

5. A statement that the wood did not contain any bore or grub holes larger than 3mm, no presence of visible bark, and no other sign of pest infestation.

#### AP3.6. CONSEQUENCES OF AUDIT FAILURE/NON-COMPLIANCE

Consequences are identical to those in paragraph C3.2.2.

#### AP3.7. DoD SITE CERTIFICATION

Each DoD Component is responsible for developing, promulgating, and performing an annual audit of their DoD “Pest Free” certified WPM sites to ensure that they meet the requirements in this manual. As a minimum, DoD “Pest Free” certified WPM site commander shall:

AP3.7.1. Establish and appoint in writing a WPM site custodian at each local certified site. The site custodian shall be responsible for maintaining WPM data for audit purposes.

AP3.7.2. Maintain records of individuals who passed the DoD WPM training on the WPM Web site.

AP3.7.3. Maintain documents pertaining to the number of DoD “Pest Free” certification marking devices in the custody of the location.

AP3.7.4. Maintain records of DoD “Pest Free” certification mark information. The records shall include a copy of the DoD Component specific WPM implementation guidelines. Additionally, the site commander shall maintain any records of corrective actions taken in response to reported WPM audit failures or discrepancies developed against the site by an audit, shipping or receiving activity.

AP3.7.5. Maintain accurate records as required by paragraph C.3.1. and AP3.4.

#### AP3.8. DOCUMENT RETENTION

WPM records and other documents or records as specified by the DoD Component shall be retained at each certified site for a period of not less than 2 years.