

CTPATTM
YOUR SUPPLY CHAIN'S STRONGEST LINK.

MSC Agricultural Security



**U.S. Customs and
Border Protection**

MSC Categories – Agricultural Security



Agriculture is the largest business sector



Contaminants found in all conveyances

(all modes / all types of cargo - 352 pests discovered daily by CBP)



Contaminants harbor pests and diseases



Threaten this industry



We know that ... and so do terrorists



Objective – Destroy our
Economic Viability

New Category

Invasive species cause over \$138B annually in economic and environmental losses. Eliminating contamination in conveyances and cargo may decrease holds, delays, and commodity returns and treatments.

Bioterrorism (*intentional*)

- Bioterrorism is a threat **not only to our health and safety, but also to U.S. economic security.**
- In the aftermath of September 11, 2001, Congress passed the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 ("The Bioterrorism Act"), which specified **Protecting the Safety and Security of Food and Drug Supply** as one of the five designated titles.
- A 2012 report by the FBI emphasized that **terrorists consider America's agriculture and food production to be targets.** In particular, food supply is among the most vulnerable and least protected target.
- A terrorist attack on the food and agriculture industries would likely involve contaminating resources. To mitigate this threat, **government and the private sector must improve collaboration** on resources, expertise, and initiatives to achieve shared security and emergency preparedness objectives.

Contamination (*incidental*)

- Like bioterrorism, contamination poses a threat to **our health and safety, and to U.S. economic security.**
- Agriculture is the largest industry and employment sector in the United States, and one of **the greatest risks to the success of this industry are foreign contaminants and pests.**
- Contaminants like soil, manure, seeds, plant and animal material may harbor invasive pests and diseases, and invasive species **have caused over \$138 billion annually in economic and environmental losses** in the U.S.
- **Conveyance contamination is found in all pathways:** sea, air, land and rail; additionally, contamination is found on regulated agricultural commodities and general cargo, not just perishable agricultural commodities. **Eliminating contaminants will decrease conveyance and cargo holds, delays, and commodity returns or treatments.**

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Insects & Snails	Plant Material & Seeds	Garbage & Organic Material
 <p>Snails</p>	 <p>Cogon Grass</p>	 <p>Manure</p>
 <p>Grasshoppers</p>	 <p>Spilled seed on trailer floor</p>	 <p>Animal Blood</p>
 <p>Asian Gypsy moth egg masses</p>	 <p>Weed seeds stuck to WPM</p>	 <p>Soil Contamination</p>
 <p>Khapra Beetle Larvae</p>	 <p>Cottonseed in rail car springs</p>	 <p>Garbage contamination on rail</p>

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		What is it?	What is the risk?
Insects & Insect Eggs		Visible forms of animals, insects – notably gypsy moths – or other invertebrates (alive or dead, in any lifecycle stage, including egg casings or rafts)	<ul style="list-style-type: none"> • Can cause damage to shipment • May infest local vegetation • Can harbor diseases harmful to the local population
Plant Material & Seeds		Viable or non-viable plants or plant products (including fruit, seeds, leaves, twigs, roots, bark)	<ul style="list-style-type: none"> • Can carry plant pathogens and/or harbor insect pests • Many foreign weed seeds are considered Federal Noxious Weeds in the United States
Soil		Organic material, including fungi; or soil, or water	<ul style="list-style-type: none"> • Can harbor insect pests and weed seeds • May harbor nematodes (microscopic worms), which can be harmful to plants and are exceedingly difficult to eradicate • Soil is a vector for foreign animal diseases
Snails		Visible forms of animals, insects or other invertebrates (alive or dead, in any lifecycle stage, including egg casings or rafts)	<ul style="list-style-type: none"> • Many snails are destructive agricultural pests • Snails are very difficult to eradicate if they become established • Snails are vectors for both human and animal diseases
Garbage & Organic Material		Organic material of animal origin (including blood, bones, hair, flesh, secretions, excretions)	<ul style="list-style-type: none"> • Can harbor and spread foreign animal diseases • May contain prohibited plant material infested with pests and plant diseases

New Category: Eliminating contaminants from the supply chain leads to decreases in CBP cargo holds, delays in cargo arriving at its destination, and the need for commodities to be re-exported or treated (fumigated).

Section 8 of the MSC – 1 Criterion Only – Core

Other MSC requirements related to AG security in other criteria categories.

8.1 – Written procedures to prevent pest contamination to include compliance with WPM Regulations.

- All pest contamination
- IMO Definition of Pest Contamination: Visible
- WPM Highlighted

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Pest Contamination Definition – From International Maritime Organization

Pest contamination is defined as **visible** forms of animals, insects or other invertebrates (alive or dead, in any lifecycle stage, including egg casings or rafts), or any organic material of animal origin (including blood, bones, hair, flesh, secretions, excretions); viable or non-viable plants or plant products (including fruit, seeds, leaves, twigs, roots, bark); or other organic material, including fungi; or soil, or water; where such products are not the manifested cargo within instruments of international traffic (i.e. containers, unit load devices, etc.).“

Visible = No specialized equipment needed for inspections.

Wood Packaging Materials – WPM – Definition

Wood or wood products (excluding paper products) used in supporting, protecting, or carrying a commodity. **WPM includes items such as pallets, crates, boxes, reels, and dunnage.** Frequently, these items are made of raw wood that may not have undergone sufficient processing or treatment to remove or kill pests, and therefore remain a pathway for the introduction and spread of pests. Dunnage in particular has been shown to present a high risk of introduction and spread of pests.

WPM does not include: Products exempt from the ISPM 15 are made from alternative materials, like paper, metal, plastic or wood panel products (i.e. oriented strand board, hardboard, and plywood).

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Wood Packaging Materials – IPPC - ISPM 15 and 7 CFR 319.40

Meet the International Plant Protection Convention's (IPPC) International Standards for Phytosanitary Measures No. 15 (ISPM 15).

IPPC - Treaty overseen by the United Nation's Food and Agriculture Organization.

ISPM 15 - Internationally accepted measures requiring that:

- ✓ WPM be debarked and then heat treated or fumigated with methyl bromide;
- ✓ Stamped or branded with the IPPC mark of compliance (wheat stamp)

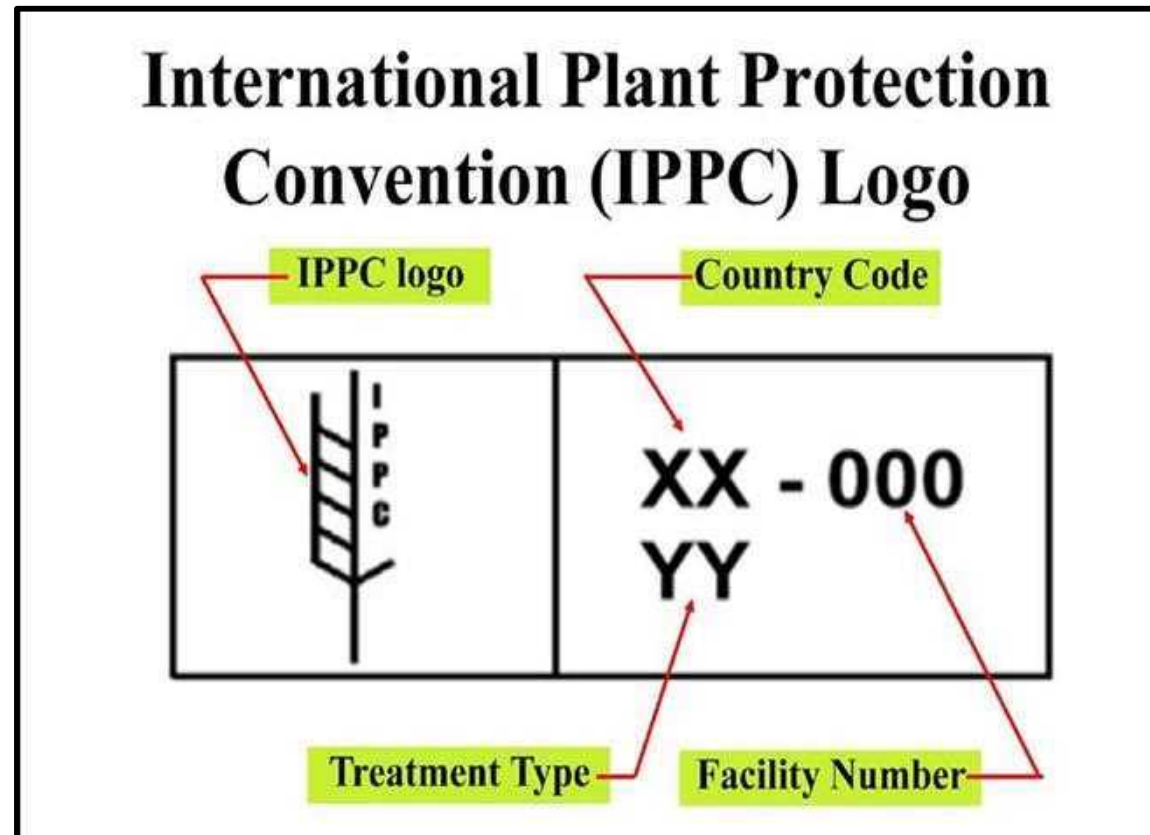
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Make sure:

- Your WPM provider is accredited ISPM 15 compliant
- You educate your supply chain partners on the ISPM 15 requirements
- You are aware of alternatives to WPM – Cost benefit analysis

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Each **full sized** piece of wood must be stamped.

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Correct IPPC Logos

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Non-Compliant IPPC Logos

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Non-Compliant IPPC Logos

Inappropriately Marked

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Pest Presence Indicators

Condition of WPM

Bark

Evidence of Pest activity

- ✓ Frass
- ✓ Holes
- ✓ Hitch hikers



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Not Pest Presence Indicators

Nail holes

- ✓ May have rust from nail
- ✓ Perfectly round or consistent shape



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High Risk Countries for WPM Pests

- Mexico
- China
- Italy
- India
- Turkey
- Russia

Top High Risk Commodities

- Manifested WPM
- Machinery (including Auto Parts)
 - Metal Products
- Stone Products (including tile)
 - Electronics
- Finished Wood Products
- Plants products and foodstuffs

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Non-Compliant WPM

- WPM Without the ISPM 15 stamp – Re-Exported
- WPM with ISPM 15 stamp but contains a wood boring insect – Re Exported
- WPM with the IPISM 15 stamp but found with a hitchhiking pest (non-wood boring)
MAY be fumigated by APHIS/PPQ

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USDA Sources of ISPM 15 – Compliant WPM

In the United States – Four Options

1. Purchase heat-treated or fumigated wood packing material that bears the American Lumber Standard Committee (ALSC) Accredited Agency Quality Mark – alsc.org
2. Purchase and use ALSC accredited heat-treated grade mark lumber to construct wood packing material
3. Use a registered heat treatment facility or fumigation facility to treat wood packing material
4. Become an ISPM 15-compliant WPM manufacturer

Other Countries - Use materials from registered and accredited manufacturer that has been heat treated or fumigated according to the International Plant Protection Convention (IPPC) regulations. Importers should contact the National Plant Protection Organization of the shipment's country of origin for more information. A list of country contacts is available on the IPPC Web site: <https://www.ippc.int/en/countries/all/contactpoints/>

Conveyance and IIT Security

5.2 – Inspection process must have written procedures for AG inspections

5.3 – Prior to loading must conduct AG and Security Inspections

5.7 – If contamination found, clean IIT / SIN = Secure, Isolate, Notify

5.9 – AGM pre departure certificates (Sea Carriers only)

5.10 – AG and security inspections for Air Carriers

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Procedural Security

7.2 – Cargo staging areas must be inspected – Free of pest contamination

7.11 – Garbage must be properly stored and disposed – Sea Carriers only

7.12 – Driver must dispose or declare personal garbage – Highway Carriers; 3PLS

Education, Training, and Awareness

12.2 – AG Inspections training

12.7 – Training on prevention of AG Contamination

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The mitigation techniques listed below are best practices in protecting against contaminants, but **do not fully guarantee that shipments, containers, and cargo will remain free from contaminants**. It is up to **each and every entity group** to ensure that there are adhering to agricultural pest and contamination requirements.



5.3 - Conduct a CTPAT Agricultural Inspection of Instruments of International Traffic (IIT)/Conveyances



Ensure conveyance is clean before loading/stuffing



Keep vegetation near facilities mowed, as these areas can harbor insects and rodents



Sweep, vacuum, wash, steam clean, and/or pressure wash Instruments of International Traffic (containers, "cookie sheets," trailers, etc.) prior to loading/stuffing



Avoid loading when insects are swarming



Vacuum wood seeds from Wood Packaging



Properly store and cover Instruments of International Traffic (pallets, dunnage, crates, etc.)



Spray off contaminated Instruments of International Traffic



Store trailers away from natural areas and/or avoid placing trailers over soil or vegetation



Bright lights attract insects, especially at night. Keep doors closed when cargo is not being loaded

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Spilled Seed on Trailer Floor



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Eliminating Contaminants – Vacuum, Broom, Blower

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**Start With Clean Trailer
Prior to Loading**



**Utilize Paved Lots to
Avoid Contamination**

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Consequences of Non-Compliance

Cargo is Re-Exported

Cargo Needs to be Fumigated

U.S. Customs and Border Protection		Significant Agriculture Incident Report		
Office of Field Operations				
Multiple Cerambycids in US Government Shipment				
SAIR NUMBER	FIELD OFFICE	PORT NAME/ CODE	PATHWAY	
SAIR01IN0317201H	HOUSTON	Houston Seaport (5501)	Maritime	
DATA/PEST INFORMATION				
Incident Date	Mar 17, 2019	EAN #		Origin
				Germany
Entry #		Tariff #		MID #
Inspected Host	MACHINERY			
Quantity (boxes)	91,050-KG		Shipper	
Interception #			<input checked="" type="checkbox"/> CTPAT	
Pest Name	Cerambycidae & Cerambycinae			
<input type="checkbox"/> FIN	<input type="checkbox"/> FIP	<input type="checkbox"/> AGT	<input type="checkbox"/> NACTU	<input type="checkbox"/> AG-BIO
			<input type="checkbox"/> RVR	<input type="checkbox"/> K-9 Name/ID
Conveyance #	MOL GLIDE		Consignee	
			<input checked="" type="checkbox"/> CTPAT	
AWB/B/L #				
Foreign Treatment PC #				WASHINGTON, DC
AGM package tracking # to OTIS			ISPM #	
Associated Port Codes		Destination State	TX	Destination zip code
NARRATIVE / ACTION TAKEN				
<i>Brief narrative describing Who, What, Where, and How. (i.e.: % offloaded, tools, pest location, techniques)</i>				
On March 17, 2019, CBPAS X inspected non-containerized money engraving/printing machines from X that were being imported for the X. During the inspection, wood boring larvae were extracted from the IPPC marked WPM. EAN Serial No. X was issued immediately to the importer requiring the cargo to be tarped (safeguarded) pending the urgent identification of the interception. On March X, 2019, the specimens were forwarded to the local USDA Identifiers, and they identified the specimens to be Cerambycidae & Cerambycinae. CBPAS X issued the final disposition EAN Serial No. X to the broker requiring the immediate exportation of the entire shipment. Pending Title 19 Penalty for the importation of non-compliant WPM. →				
Final Action Taken	<input type="checkbox"/> Incinerated	<input checked="" type="checkbox"/> Re-exported	<input type="checkbox"/> Steam Sterilization	<input type="checkbox"/> Other
	<input type="checkbox"/> Garbage Violations	<input type="checkbox"/> Treatment	<input checked="" type="checkbox"/> Penalty	Amount \$: TBD
PHOTOS				

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USDA - Wood Packaging Materials Frequently Asked Questions -

https://www.aphis.usda.gov/aphis/ourfocus/planthealth/sa_export/sa_wood_packaging/ct_wpm_faqs



Wood Boring Insects Found in Wood Packaging Material

Weevils *Curculionidae*



Woodwasps *Siricidae*



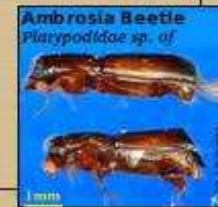
Clearwing Moths *Sesiidae*



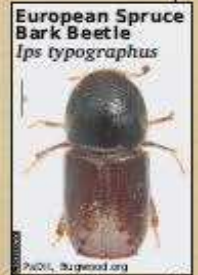
Carpenter Moths *Cossidae*



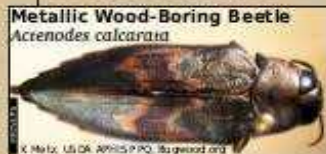
Ambrosia Beetles *Platypodidae*



Bark Beetles *Scolytidae*



Metallic Beetles *Buprestidae*



Longhorned Beetles *Cerambycidae*



U.S. Customs and
Border Protection

Contact CBP Agriculture at _____



Get the Bugs Out!

Help Protect America from Invasive and Destructive Pests

Galleries

Galleries are tunnels or passageways made by insects. Usually found under the bark, galleries may also be found throughout the wood.



Bark

A typical place to find insects is under the bark. Bark is prohibited on wood packaging material.



Frass

Frass or insect waste is a sign of insect activity. It varies in color from pale to almost black and may be fine and powdery, coarse like wood shavings or any texture in between.



Exit/Entrance Holes

Insect entrance or exit holes may look like nail holes. Nail holes typically have some rust.



Concealed Solid Wood



Insects

Presence of possible foreign insects poses a risk. Adults and larvae can both be destructive.



U.S. Customs and Border Protection

Contact CBP Agriculture at _____



8.1 HC/LH/3PL/IMP/EXP/SEA/AIR/RAIL/FM/CON

- CTPAT Members **MUST** have written procedures designed to prevent visible pest contamination to include compliance with Wood Packaging Materials (WPM) regulations.
- Measures regarding WPM **MUST** meet the International Plant Protection Convention's (IPPC) International Standards for Phytosanitary Measures No. 15 (ISPM 15).
- Visible pest prevention measures **MUST** be adhered to throughout the supply chain.



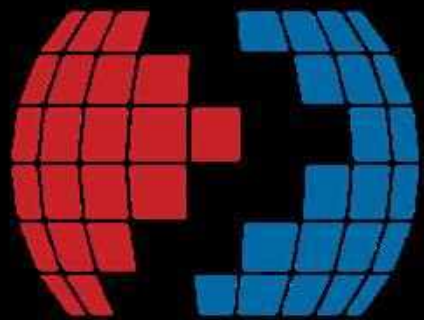
8.1 Implementation Guidance

- WPM is defined as wood or wood products (excluding paper products) used in supporting, protecting, or carrying a commodity. **WPM includes items such as pallets, crates, boxes, reels, and dunnage.** Frequently, these items are made of raw wood that may not have undergone sufficient processing or treatment to remove or kill pests, and therefore remain a pathway for the introduction and spread of pests. Dunnage in particular has been shown to present a high risk of introduction and spread of pests.
- The IPPC is a multilateral treaty overseen by the United Nation's Food and Agriculture Organization that aims to secure coordinated, effective action to prevent and to control the introduction and spread of pests and contaminants.
- ISPM 15 includes internationally accepted measures that may be applied to WPM to reduce significantly the risk of introduction and spread of most pests that may be associated with WPM. ISPM 15 affects all wood packaging material requiring that they be debarked and then heat treated or fumigated with methyl bromide and stamped or branded with the IPPC mark of compliance. This mark of compliance is colloquially known as the "wheat stamp". Products exempt from the ISPM 15 are made from alternative materials, like paper, metal, plastic or wood panel products (i.e. oriented strand board, hardboard, and plywood).



Questions/Discussion





CTPAT™

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U.S. Customs and
Border Protection

Preventing the Spread of Invasive Pests

Recommended Practices for the Container Supply Chain

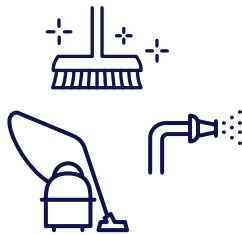


Invasive pests threaten crops, forests, and livestock. By taking reasonable steps to keep containers and their cargo clean, you will help prevent the spread of invasive pests through commerce and facilitate the movement of your containers through North American ports.

The risk for pests to contaminate containers and cargo is greatest at the packing location. Shippers or packers acting on behalf of shippers should put measures in place to minimize pest contamination during packing. Others in the supply chain should also put measures in place to reduce the risk of pest contamination while the container is in their control. These measures should be in accordance with individual roles and responsibilities in the supply chain and should take into consideration all safety and operational constraints.

CLEAN CONTAINERS

Sweep, vacuum, or wash containers before packing to remove potential contaminants. Be aware that environmental factors, such as heavy rains, may increase the likelihood of certain types of contamination.



CLEAN CARGO

Ensure cargo packed into the container is clean and free of visible contaminants.



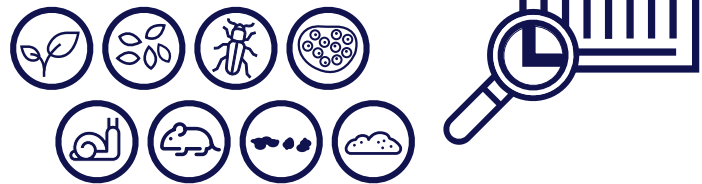
CLEAN STAGING/PACKING AREA

Clear the cargo staging and packing area to ensure that it is free from plants and visible pests. Containers placed on grassy areas may be more vulnerable to contamination by insects and snails.



VISUALLY INSPECT CONTAINERS BEFORE PACKING

Visually inspect the outside and inside of the container for visible contaminants such as plants, seeds, insects, egg masses, snails, animals, animal droppings, and soil.



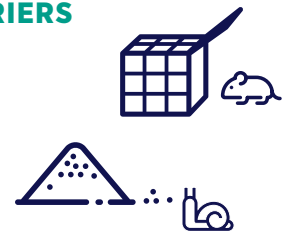
DO NOT KEEP UNDER BRIGHT LIGHTS

Do not keep containers under bright lights, which will attract insects to the cargo staging area and increase the likelihood of contamination. If containers must be kept under bright lights, thoroughly check each container before packing.



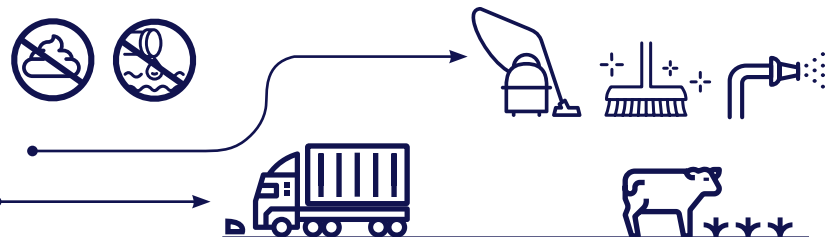
USE BAITS, TRAPS OR BARRIERS

Where appropriate, use baits, traps, or barriers to keep pests out of the cargo staging and packing area. For example, you can use a salt barrier to prevent snail infestations.



WHEN MOVING CONTAINERS BETWEEN ANIMAL PRODUCTION FACILITIES

1. Avoid driving containers through manure or wastewater.
2. Where applicable, sweep, vacuum, or wash containers to remove contaminants, such as soil or animal droppings, that could move animal disease from one location to another.
3. Whenever possible, park containers on paved areas and away from livestock pens and pastures.



NANKAI TRANSPORT S.O.P. INSTRUCTIONS WOODEN PACKING MATERIALS

WPM, such as pallets, crates, boxes, and dunnage used in international trade to support or brace cargo, must be treated to prevent the introduction of insects harmful to U.S. agriculture and forests. WPM need not be bark free as long as it is treated.

WPM does not include manufactured wood such as plywood, veneer, fiberboard, particle board, corrugated board, or oriented strand board.

Also excluded are loose wood materials such as shavings and excelsior, whisky and wine barrels, wine crates for vintage years prior to 2006, ammo crates, and paper products.

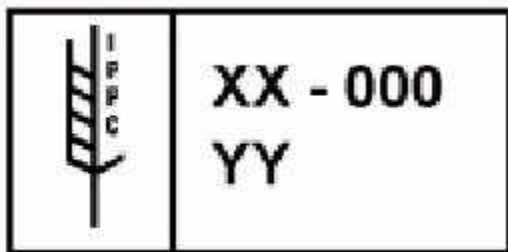
The approved treatments are:

- heat treatment to a minimum wood core temperature of 56° C/133° F for a minimum of 30 minutes, or
- fumigation with methyl bromide

To certify treatment, the WPM must be marked in a visible location, preferably on at least 2 opposite side of the article, with the approved International Plant Protection Convention (IPPC) logo.

The mark must be legible and permanent.

The mark will include the IPPC graphic symbol, the ISO country code for the country that treated the WPM, a unique number assigned by the national plant protection agency of that country to the producer of the wood packaging material, and an abbreviation showing the type of treatment (HT for heat treatment or MB for methyl bromide).



Decoding

XX = Country of manufacture

000 = Code traceable to the source (e.g., pallet manufacturer)

YY = Treatment Measure (HT or MB)

Unauthorized use of the IPPC logo and treatment mark is a violation of trademark laws. Licensed fumigators not registered in this program can still fumigate wood packaging and certify these products on their own but they are not authorized to apply the treatment mark or any mark similar to it.

Verification of compliance with the WPM rules is by visual inspection only.

A statement on shipping documents is neither required or nor accepted.

The IPPC marking must be visible.

The pallet must be loaded with the marking visible to APHIS inspectors. Shipments can be refused entry and will need to be re-exported at considerable cost, simply because the pallet was turned the wrong way around.

The last pallets (or crates or other WPM) loaded in the container must have the IPPC marking facing out.

Unmarked WPM will be considered untreated and non-compliant, and must be either re-exported or separated from the cargo at the importer's expense.

Post-entry treatment or incineration will not be allowed. For cargo that must be re-exported, many steamship lines will require a letterhead statement from the foreign shipper that they will accept the returned goods.

U.S. Customs and Border Protection (CBP) may issue claims for liquidated damages and/or penalties against importers for violation of WPM regulations.

Report any instance of untreated wood packing material found to your supervisor.

Check for current documentation at APHIS website:

<https://www.aphis.usda.gov/aphis/ourfocus/importexport>

For Exports:

To make the WPM suitable for international shipment, it must be marked with the HT or MB treatment mark. To apply the mark, the facility (i.e., pallet manufacturing or recycling, pest control, cargo forwarding, export brokerage) must be certified by an inspection agency. These agencies provide inspection and auditing services to certified facilities that use the IPPC treatment mark.

A List of certified fumigators and a list of accredited inspection agencies from the National Wooden Pallet and Container Association and The American Lumber Standard Committee (ALSC) is found here:

<http://www.palletcentral.com/>

http://www.alsc.org/contacts_untreatedlist_mod.htm

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