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To All Shippers and Packers of Explosives Cargo into ISO
Shipping Containers Destined For Australia

Ridgeway International Ltd's Guidance on Bark Free Dunnage



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For some years now it has been possible to import into Australia ISO shipping containers packed with cargo including explosives and ammunition, secured against movement at sea with wooden dunnage, without the need for fumigation of the packed ISO unit. Fumigation was the accepted method of treatment for all timber inside the container prior to the international acceptance of the use of timber pre treated to a recognised standard.

The methodology which the Australian Quarantine Service stipulate in their booklet Cargo Containers Quarantine Aspects and Procedures dated 15 April 2009 is summarised as follows: Ensure that any packaging and dunnage has been treated as per ISPM 15. Any wood treated as such will have the ISPM 15 mark, known as the "wheat ear" symbol stamped on it. The ISO container must also be accompanied by an ISPM FCL Packing Declaration which can be downloaded either from our web site or from <http://www.daff.gov.au/aqis/import/general-info/co-reg/acceptable-docs>.

However a discrepancy seems to exist between AQIS's rules and ISPM 15 2009, available at www.ispm15.com, which allows a tolerance within its description of de barked wood as follows:

Annex 1: "Irrespective of the type of treatment applied, wood packaging material must be made of debarked wood. For this standard, any number of visually separate and clearly distinct small pieces of bark may remain if they are: -less than 3 cm in width (regardless of the length) or - greater than 3 cm in width, with the total surface area of an individual piece of bark less than 50 square cm.

The AQIS booklet refers not to "de barked" wood but to "bark free" wood as follows at 1.3.3.:

"AQIS requires imported timber packaging and dunnage to be free of bark. Bark has the potential to contain numerous pests and pathogens of quarantine concern that are not addressed by AQIS approved fumigation treatments. It compromises the reliability of inspection as a quarantine risk mitigation measure and acts as a shelter for quarantine pests. It also raises contamination risks through its physical characteristics. What is bark? Bark is the external natural growth layer covering trees and branches. It is prone to attack from pests and pathogens that are of quarantine concern. All timber packaging and dunnage is to be bark free."

The AQIS Packing Declaration forms pose the following question in a part titled "Bark Statement": "(Bark is the external natural layer covering trees and branches. This statement is only required if timber/packaging dunnage is declared using the timber or ISPM 15 statements. A bark statement is required for all timber packaging/dunnage including ISPM 15 compliant packaging/dunnage.) "Is all timber packaging/dunnage used in this consignment free from bark?" A "Yes/No" box follows.

Problems arise therefore when shippers and packers outside Australia purchase and use dunnage timber which is marked with the ISPM "wheat ear mark", believing it to meet AQIS requirements, even if there is evidence on the wood of bark within ISPM tolerances, vascular cambium (essentially the layer between the wood and the bark), ingrown bark around knots, and bark pockets between rings of annual growth. The Packing Declaration is ticked "Yes" as bark free in the belief that bark free is per ISPM 15.

On arrival in Australia AQIS inspectors open every ISO container and on observing bark or any of the items above they will determine that the dunnage is not bark free. AQIS's remedy for the presence of bark is unpacking and destruction of the wood in an AQIS approved area. However none of the customary AQIS approved unpacking areas are licenced for the handling and unpacking of explosives. Therefore special and expensive arrangements have to be made. Moreover AQIS has the authority to determine that such containers must go back onto the vessel they arrived on and leave the country.

From practical experience we know that AQIS are likely to "fail" any container with any evidence of bark whatsoever including discolouration where bark once was.

There is a new AQIS policy book due to come into effect on 10 Jan 2010 called the Non-Commodity Information Requirements Policy but the stance on bark is the same.

In summary any wood dunnage for Australia must be bark free per AQIS's rules, rather than de barked within ISPM tolerances. This guidance deals only with the issue of bark on wood. All shippers, packers and importers must follow AQIS's and all other applicable regulations at the time of shipment.

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