



Department of Defense MANUAL

NUMBER 4140.65

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Incorporating Change 1, August 31, 2018

USD(A&S)

SUBJECT: Issue, Use, and Disposal of Wood Packaging Material (WPM)

References: See Enclosure 1

1. PURPOSE. This Manual:

a. Reissues DoD 4140.65-M (Reference (a)) in accordance with the authority in DoD Directive 5134.12 (Reference (b)) to establish guidance for the issuance, use, and disposal of wood packaging material (WPM) in compliance with International Standards for Phytosanitary Measures (ISPM) Number 15 (Reference (c)). When used as an adjective in this Manual, Reference (c) will be referred to as "ISPM No. 15."

b. Issues WPM procedures to:

(1) Implement the Memorandum of Agreement between the United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) Plant Protection and Quarantine and the Department of Defense (Reference (d)).

(2) Comply with section 319.40-3 of title 7, Code of Federal Regulations (Reference (e)).

2. APPLICABILITY. This Manual applies:

a. To OSD, the Military Departments, the Office of the Chairman of the Joint Chiefs of Staff and the Joint 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 (hereinafter referred to collectively as the "DoD Components").

b. To U.S. vessels.

3. DEFINITIONS. See Glossary.

4. RESPONSIBILITIES. See Enclosure 2.

5. PROCEDURES. See Enclosure 3.

6. INFORMATION COLLECTION REQUIREMENTS

a. The monthly lumber usage report referred to in paragraphs 2.a. and 4.e.(8) of Enclosure 3 of this Manual has been assigned report control symbol DD-AT&L(M)2285 in accordance with the procedures in Directive-Type Memorandum 12-004 (Reference (f)) and DoD 8910.1-M (Reference (g)).

b. The Component reports referred to in paragraph 2.b.(1)(d)1 of Enclosure 3 of this Manual has been assigned report control symbol DD-AT&L(A,M,Q,SA)2498 in accordance with the procedures in References (f) and (g).


7. RELEASABILITY. UNLIMITED. This Manual is approved for public release and is available on the Internet from the DoD Issuances Website at <http://www.dtic.mil/whs/directives>.

8. SUMMARY OF CHANGE 1. This change reassigns the office of primary responsibility for this manual to the Under Secretary of Defense for Acquisition and Sustainment in accordance with the July 13, 2018 Deputy Secretary of Defense Memorandum (Reference (h)).

9. EFFECTIVE DATE

a. This Manual is effective August 21, 2012.

b. This Manual must be reissued, cancelled, or certified current within 5 years of its publication in accordance with DoD Instruction 5025.01 (Reference (i)). If not, this Manual will expire effective August 21, 2022 and be removed from the DoD Issuances Website.


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ENCLOSURE 1

REFERENCES

- (a) DoD 4140.65-M, "Compliance for Defense Packaging: Phytosanitary Requirements for Wood Packaging Material (WPM)," September 7, 2007 (hereby cancelled)
- (b) DoD Directive 5134.12, "Assistant Secretary of Defense for Logistics and Materiel Readiness (ASD(L&MR)), May 25, 2000
- (c) International Standards for Phytosanitary Measures No. 15, "Regulation of Wood Packaging Material in International Trade," 2009¹
- (d) Memorandum of Agreement Between the United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) Plant Protection and Quarantine (PPQ) and DoD," August 12, 2011
- (e) Sections 319.40-1 and 319.40-3 of title 7, Code of Federal Regulations
- (f) Directive-Type Memorandum 12-004, "DoD Internal Information Collections," April 24, 2012
- (g) DoD 8910.1-M, "DoD Procedures for Management of Information Requirements," June 30, 1998
- (h) Deputy Secretary of Defense Memorandum, "Establishment of the Office of the Under Secretary of Defense for Research and Engineering and the Office of the Under Secretary of Defense for Acquisition and Sustainment," July 13, 2018
- (i) DoD Instruction 5025.01, "DoD Directives Program," October 28, 2007
- (j) American Lumber Standard Committee, Incorporated, "Wood Packaging Material Policy," November 15, 2002²
- (k) National Wooden Pallet and Container Association, "Export Wood Packaging Material Fumigation Policy," June 2009³
- (l) American Lumber Standard Committee, Incorporated, "Wood Packaging Material Enforcement Regulations," November 13, 2009⁴
- (m) Defense Logistics Manual 4000.25-M, Volume 2, "Defense Logistics Management System (DLMS): Supply Standards and Procedures," current edition
- (n) United States Transportation Command, "Defense Transportation Regulation," current edition
- (o) National Institute of Standards and Technology Voluntary Product Standard PS 20-10, "American Softwood Lumber Standard," June 2010⁵
- (p) DLAI 4145.4/AR 740-3/AFJMAN 23-231/NAVSUPINST 4400.100/MCO 4450.15, "Stock Readiness," January 6, 2003

¹ Available at <https://www.ippc.int/IPP/En/default.jsp>

² Available at <http://www.alsc.org>

³ Available at <http://www.nwpca.com>

⁴ Available at <http://www.alsc.org>

⁵ Available at <http://www.gsi.nist.gov/global/index.cfm/L1-5/L2-44/A-355>

ENCLOSURE 2

RESPONSIBILITIES

1. ASSISTANT SECRETARY OF DEFENSE FOR LOGISTICS AND MATERIEL READINESS (ASD(L&MR)). The ASD(L&MR), under the authority, direction, and control of the Under Secretary of Defense for Acquisition, Technology, and Logistics (USD(AT&L)), shall oversee the issuance, use, and disposal of WPM within the Department of Defense to ensure compliance with References (c) and (e) and implementation of Reference (d).

2. DIRECTOR OF THE DEFENSE LOGISTICS AGENCY (DLA) AND SECRETARIES OF THE MILITARY DEPARTMENTS. The Director, DLA, under the authority, direction, and control of the ASD(L&MR), and the Secretaries of the Military Departments shall:

a. Comply with this Manual, promote and implement its procedures, and monitor and evaluate performance to ensure the elimination of pests using WPM as a host.

b. Participate with the USDA, APHIS, and other key domestic and international organizations in meeting requirements of Reference (c).

c. Ensure that sources, shippers, and receivers in their respective supply chains identify and replace or remediate WPM that does not comply with Reference (c).

d. Ensure that all WPM that is procured complies with References (c) or (e) and, where appropriate, is consistent with guidelines published by the American Lumber Standard Committee (ALSC) (Reference (j)) or the National Wooden Pallet and Container Association (NWPCA) (Reference (k)).

e. Develop and publish procedures and require annual audits of their self-certified WPM sites to ensure that the procedures and sites meet ISPM No. 15 standards when WPM is:

(1) Used for shipments to countries requiring standards compliant with References (c) or (e); or

(2) Used with imports into the United States.

f. Coordinate through the ASD(L&MR) on DoD level WPM issues.

ENCLOSURE 3

PROCEDURES

1. SUPPLY CHAIN PROCESS

a. General

(1) Regardless of its origin, WPM that is to be entrusted to or used by the DoD must be compliant with Reference (c) and the International Plant Protection Convention (IPPC) as prescribed in Reference (d) when WPM is:

(a) Used in shipments to countries requiring compliance with criteria in References (c) or (e); or

(b) Used with imports into the United States.

(2) WPM includes wood pallets, skids, load boards, pallet collars, 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 in accordance with this Manual. Reference (c) establishes worldwide standards for WPM and specifies actions to prevent the introduction or spread of forest pests and promotes measures for control.

(3) It is NOT required to treat and mark:

(a) Packaging materials that have undergone a manufacturing process such as manufactured (processed) wood products (e.g., plywood, particleboard, oriented strand board (OSB), and veneers).

(b) Pieces of wood that are less than 6 millimeters (mm) (or 1/4 inch) in any dimension.

b. Procurement. References (j) and (k) provide guidelines for procuring WPM (including dunnage) in accordance with Reference (c) for shipments to any country or for storage. DoD Components shall also require the application of the commercial heat treatment process stamp approved by the ALSC. Compliant non-manufactured WPM is marked either heat treated (HT) as established by the ALSC, or chemically treated with methyl bromide (MB) as established by the NWPCA. The requirements in subparagraph 1.b. (1) of this enclosure shall be met in every solicitation for goods.

(1) WPM Requirements. All WPM, as defined in section 319.40-1 of Reference (e), shall be debarked and then heat or chemically treated, certified, and marked in accordance with one of these approved processes:

(a) WPM may be constructed of HT lumber (treated to 56 degrees Celsius (C) or 132.8 degrees Fahrenheit (F) (core temperature) for 30 continuous minutes) or constructed from untreated lumber and then heat treated to 56 degrees C or 132.8 F (core temperature) for 30 minutes as certified by an ALSC accredited agency in accordance with Reference (g) and the ALSC Regulations (Reference (l)).

(b) WPM may be chemically treated with MB as established in Reference (k) on WPM implementation of ISPM No. 15 standards in the United States.

(c) Removal of bark is required regardless of type of treatment applied. However, any number of separate small pieces of bark may remain if they are either:

1. Less than 1 1/4 inches (3 centimeters (cm)) in width (regardless of the length);
or

2. If greater than 1 1/4 inches (3 cm) in width, the total surface area of an individual piece of bark is less than 7 3/4 square inches (50 square cm).

(d) All materials must include markings in accordance with Reference (c) and be placed in an unobstructed area readily visible to inspectors, unless section 319.40-3(b)(4) of Reference (e) applies.

1. In accordance with Reference (c), containers shall be marked on at least two opposite sides. Pallet markings shall be applied to the side of the stringer or end of the block on diagonally opposite sides and ends of the pallet and be contrasting and clearly visible.

2. All dunnage used in configuring and securing the load shall also comply with Reference (c) and be marked with an approved dunnage stamp.

3. However, section 319.40-3(b)(4) of Reference (e) allows WPM used by DoD for nonregulated articles to be imported into the United States with use of the DoD "Pest Free" mark.

(2) Contracts for Bulk Lumber. Contracts for the purchase of bulk lumber used for packaging shall meet the requirements in subparagraph 1.b.(1) of this enclosure.

(3) Government Charge Card. Customers shall ensure that lumber and fabricated WPM procured via local purchase on a Government charge card shall comply with the requirements in this Manual.

(4) Vendor Order

(a) All contracts shall require vendors to meet ISPM No. 15 standard requirements, or Reference (e) requirements if applicable, prior to shipping goods to the Government.

(b) Contracts shall provide that failure to meet these requirements shall result in the Government rejecting the material and returning same to the vendor.

(c) When the Government rejects the material, the Government representative receiving the material shall prepare a supply discrepancy report (SDR) using Standard Form (SF) 364, "Report of Discrepancy (ROD)," in accordance with Volume 2 of Defense Logistics Manual 4000.25-M, Volume 2 (Reference (m)). Use packaging discrepancy code P215 when completing the SDR.

c. Receiving. The DoD Components shall monitor all incoming WPM for consistency with Reference (c) and this Manual. Retrograde items being shipped into the United States from a location outside the United States shall, as a minimum, comply with the procedures in section 4 of this enclosure. 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.

(1) Inspection for Compliance. The steps used to inspect for WPM compliance are:

(a) Visually inspect incoming receipts for the ISPM No. 15 certification mark.

(b) If there are no certification markings, determine if the WPM can continue to be used consistent with section 319.40-3(b)(4) of Reference (e). If the WPM cannot be used, it will be disposed of as prescribed by subparagraph 1.b.(3) of this enclosure.

(c) When shipments are received at a DLA or other DoD consolidation and containerization point (CCP) for delivery outside of the United States from a non-DoD Governmental organization (e.g., General Services Administration), the DLA CCP shall:

1. Inspect for ISPM No. 15 compliance and remediate as appropriate for shipments to ISPM No. 15 participating countries (also referred to as signatory countries).

2. Inspect for compliance with the DoD "Pest Free" certification process as outlined in section 4 of this enclosure for shipments to non-ISPM No. 15 participating countries (also referred to as non-signatory countries).

(2) Report Discrepancies. For discrepancies with shipments, prepare an SDR in accordance with Reference (m) for WPM that does not meet the requirements in ISPM No.15. Cite discrepancy code P215 "Discrepancies related to specified requirements for WPM" on the SF 364. Provide specific discrepancy information in the remarks section. Complete an SF 1080, "Voucher for Transfers Between Appropriations and/or Funds." If possible, attach photographs of repairs made when funds are expended to bring the shipment into compliance in accordance with the SDR process in Reference (m).

(3) Determine Disposition

(a) Compliant WPM. If the reusable shipping and storage container is compliant, the container shall be used for return of approved items. Other compliant WPM shall be recycled

and reused in local applications (e.g., packaging and shipping operations). Compliant WPM that cannot be recycled shall be disposed of under host nation, State, and local laws and governing DoD or Military Service directives.

(b) Collection Areas. Theater commanders shall establish collection areas for WPM and dunnage brought into a theater of operations following the instructions in paragraphs 1.c.(3)(a) and 1.c.(3)(c) of this enclosure.

(c) WPM That Does Not Meet the Requirements in ISPM No.15. WPM that does not meet the requirements in ISPM No.15 shall be disposed of as required under host nation, State, and local laws, or treated by one of the two approved methods (see subparagraphs 1.b.(1)(a) and (b) of this enclosure) to bring the WPM into compliance.

(4) Local Service Contract for Disposition. In locations where disposition of WPM that does not meet the requirements in ISPM No.15 is not permitted, local service contracts shall be initiated to bring the WPM into compliance for disposition.

d. Existing WPM and Dunnage

(1) If WPM originated from nonparticipating ISPM No. 15 countries or is material that preceded the implementation of Reference (c), inspect and segregate all WPM and dunnage to determine future use or application. WPM and dunnage will be certified in accordance with the process and procedures contained in Reference (c) or phytosanitary requirements in Reference (e). WPM that cannot meet either of the two requirements will be segregated for potential use as described in paragraphs 1.d.(2) to 1.d.(6) of this enclosure.

(2) WPM and dunnage that can be certified as ISPM No. 15 compliant using the process contained in subparagraph 1.e.(1) of this enclosure will be marked in accordance with paragraph 1.f of this enclosure and segregated for use to ship materials to other ISPM No. 15 participating countries. A list of ISPM No. 15 participating countries shall be maintained and available to all DoD shippers via the DoD WPM Website at <https://tarp.navsisa.navy.mil/wpm>.

(3) Until expended, existing inventories of WPM stock that do not meet requirements in Reference (c) may be imported or used within the United States if it meets Reference (e) requirements.

(4) Existing inventories of WPM that do not meet requirements in Reference (c) may be used for shipments to non-ISPM No. 15 participating countries using the "DoD Pest Free" procedures in section 4 of this enclosure as agreed to in Reference (d). To expedite usage of this existing WPM, supply activities should issue WPM from the oldest stock for use in the United States and shipments to non-ISPM No. 15 participating countries and issue WPM from the newest stock for shipments to ISPM No. 15 participating countries.

(5) Until expended, existing inventories of WPM that do not meet ISPM No. 15 requirements may also be used for shipments of assets destined for Navy vessels, pre-positioned ships, or designated combat zones when they will be used aboard ship or returned to a shore

activity in the United States upon return from deployment. All such WPM assets identified for shipboard use shall have “Shipboard Use Only” in the remarks section of the shipping documents and shall be certified using the DoD “Pest Free” certification. WPM that do not meet ISPM No. 15 requirements may not be used for shipments destined for Navy vessels in which the material has a participating ISPM No. 15 country as the final destination.

(6) Stocks located in an ISPM No. 15 participating country that were there prior to December 2009 can be shipped within the borders of that country.

e. Remediation Actions. The DoD Components shall remediate WPM that does not meet requirements in Reference (c) before it is shipped to an ISPM No. 15 participating country. 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 subparagraph 1.e.(1)(b) of this enclosure may be used with prior approval. If reuse is not feasible, WPM shall be disposed of using environmentally safe methods. Following procedures in Reference (g) for SDRs, repackaging and disposal costs associated with this WPM shall be the responsibility of the owner of the stock or the previous shipper.

(1) Detailed Methods. At the remediation area, all WPM that does not meet requirements in Reference (c) 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.

(a) Heat Treatment. In selected U.S. locations, the DoD procures and operates heat treatment facilities for the treatment of WPM, and specialty WPM fabricated by the DoD, that does not meet the requirements of Reference (c). The USDA APHIS has given the responsibility for heat treatment compliance of the WPM ISPM No. 15 guidelines to the ALSC, which has issued compliance regulations (Reference (1)). When WPM is heat treated, the treating facility shall apply its ALSC assigned ISPM No. 15 certification mark. The DoD shall not buy and process bulk raw lumber through heat chambers. Bulk raw lumber shall be acquired as HT or kiln-dried (KD)-HT compliant. The heat chambers may only be used to process WPM into compliant WPM or for specialty WPM fabricated from green lumber.

1. WPM and dunnage shall be heat treated to a minimum core temperature of 56 degrees C or 132.8 degrees F for 30 continuous minutes and marked “HT” as stated in subparagraph 1.b.(1) of this enclosure.

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

3. The DoD Component’s WPM program shall have aggressive enforcement provisions that include warnings, suspensions or revocation of ISPM No. 15 heat treatment certification, and marking capabilities when evidence of noncompliance is obtained or observed.

(b) Fumigation. Fumigation is authorized for the treatment of WPM, although the DoD does not recommend this option because the current treatment chemical, methyl bromide

(MB) is an ozone-depleting substance. The USDA APHIS has given the responsibility for fumigation compliance of the WPM ISPM No. 15 guidelines to the NWPCA (Reference (k)). Approval to use fumigation must be obtained through the Military Service or Defense Agency senior acquisition official and the DoD Component WPM program manager.

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. Because use of MB was phased out in January 1, 2005, a critical use exemption must be obtained.

2. MB is presently the only fumigant recognized for use.

3. Fumigation at a location outside the United States shall be performed in accordance with the status of forces agreement with the host nation and applied according to the ISPM No. 15 fumigation schedule.

4. Fumigated WPM shall be marked "MB."

(2) Return to Origin. If the options in subparagraphs 1.e.(1)(a) and (b) of this enclosure are not feasible, the shipment shall, if provided for in the contract, be returned to the shipper, at its expense, in accordance with carrier policies and procedures.

(3) Painted WPM. Painting WPM is not an approved method of remediation. If WPM shall be painted, then it must be treated using one of the approved methods prior to painting and marked with the certification marking after painting.

f. WPM Certification Marking. Certification markings shall allow easy identification of compliant WPM. The DoD Components shall apply appropriate certification marking as required and defined in this Manual, including, where applicable, section (b)(4) of Reference (e).

(1) Certification marking shall be indelible and permanent. Markings may be stamped, stenciled, or branded directly onto or into the WPM.

(2) The mark shall be a contrasting color. The colors of red and orange are not authorized.

(3) 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.

(4) Dunnage certification markings shall be applied to opposite surfaces of each piece. If possible, the mark shall be visible when the dunnage is placed in the load to enable inspectors to verify the WPM's compliance without unloading or un-stuffing the container.

(a) ISPM No. 15 Certification Marking. The DoD Components that are self-certified are authorized to use the ISPM No. 15 certification mark on all WPM that fully complies with ISPM No. 15 guidelines (see Figure 1).

1. The ISPM No. 15 self-certification marking shall display the approved international symbol for compliant WPM along with the letters “US” in bold, the packaging activity’s DoD Activity Address Code (DoDAAC), and either “HT” denoting heat-treated WPM or “MB” denoting WPM fumigated with methyl bromide.

2. No extraneous markings are authorized within the border of the certification mark. The TRADEMARK, which represents the logo of the U.S. Department of Defense, shall appear outside the border of the certification mark.

3. The DoD Components are only authorized to use the “DoD” as the DoD trademark when self-certifying. The marking “DUN” is used strictly for dunnage. Previous versions of the DoD self-certification markings may be used until the marking device becomes worn and no longer provides a clear mark (see Figure 2).

Figure 1. ISPM No. 15 DoD Self-Certification Marks

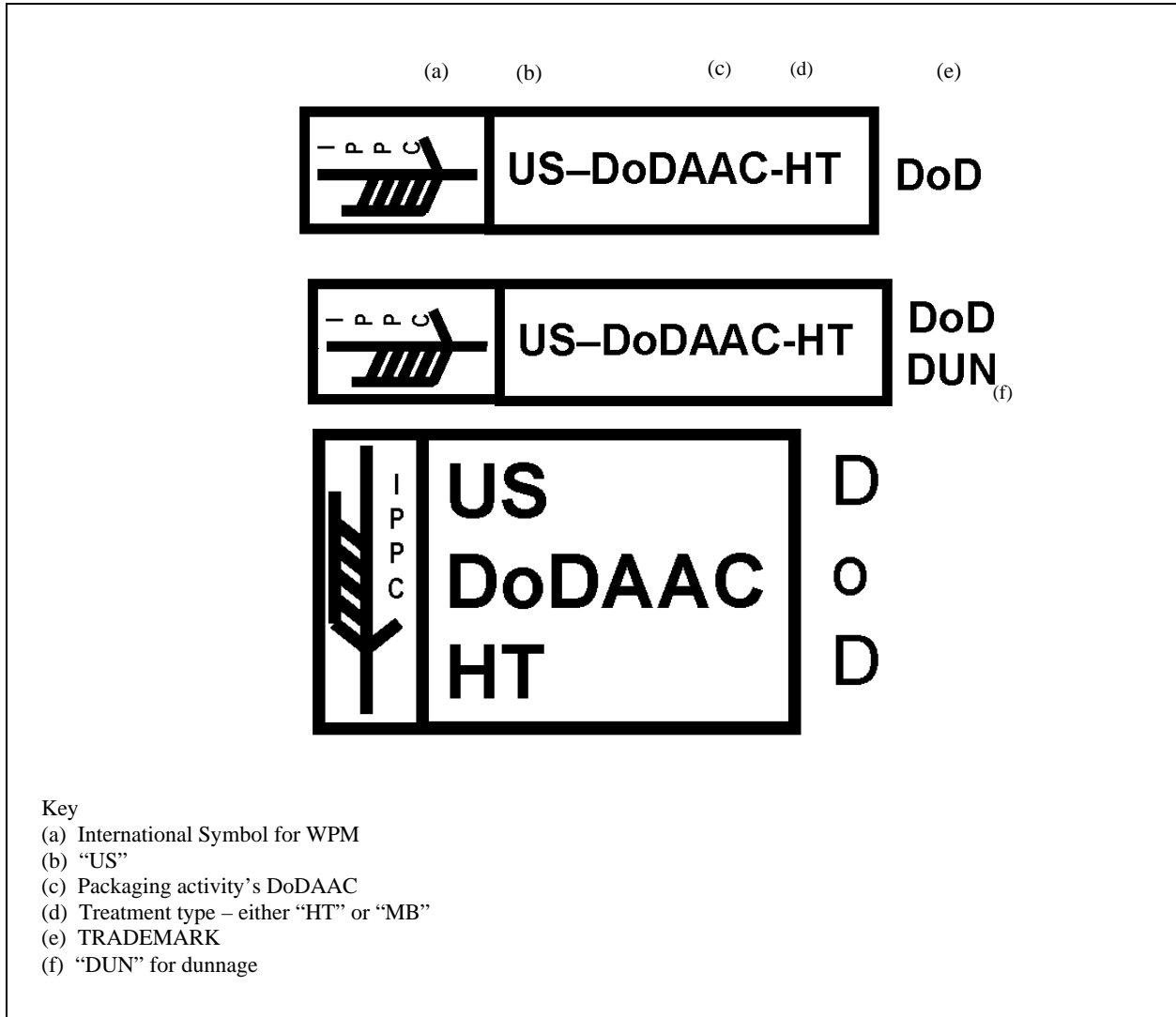
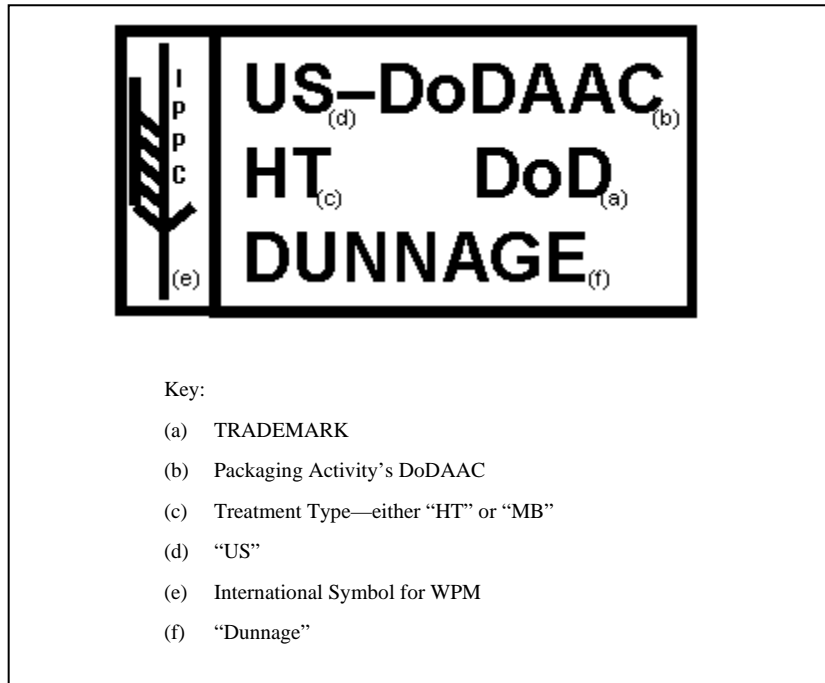
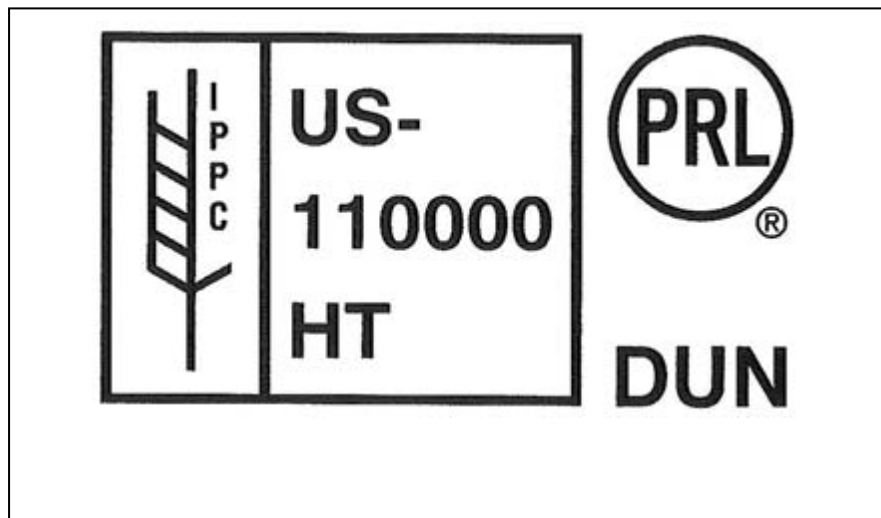


Figure 2. Previous ISPM No. 15 DoD Self-Certification Mark



(b) ALSC Accredited Certification Marking. The DoD Components that are ALSC accredited may only use and apply the certification marking supplied by ALSC under contract. Effective January 1, 2011, the markings must resemble and conform with Figure 3 of this enclosure. All ALSC accredited activities should request in writing that their ALSC accredited agency issue new marking devices that conform with Figure 3.

Figure 3. Sample ISPM No. 15 ALSC Contract Certification Mark



(c) Applying the ISPM No. 15 Certification Mark

1. The ISPM No. 15 certification mark is applied when the DoD Components, self-certified in accordance with this Manual or using an accredited host nation National Plant Protection Organization (NPPO) WPM service provider, assemble or build WPM in accordance with Reference (c), recognized USDA APHIS, or host-nation NPPO recognized programs. Certified wood procured commercially and the containers, pallets, etc., constructed from that wood shall display the ISPM No. 15 certification mark.

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 No. 15 certification mark, treatment code, and their DoDAAC. This only applies to repairs if the entire original WPM product complied with Reference (c) (see section 4 of this enclosure).

3. All DoD Components that have contracted with and trained personnel to operate the wood heat treatment chamber or kiln to process WPM products to ISPM No. 15 standard shall be enrolled with and audited by an approved ALSC or host nation accredited agency.

a. 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 (see Figure 3).

b. If located on a non-U.S. site and the host nation does not have an NPPO or ISPM No. 15 WPM program, the DoD Component shall self-certify and mark WPM that has been treated in a heat treatment chamber or kiln in accordance with U.S. requirements with ISPM No. 15 heat treatment certification markings (see Figure 1) or treat WPM and mark it in accordance with the requirements in section 4 of this enclosure.

c. The activity shall maintain detailed records attesting to chamber operations for a period of not less than 2 years. These records include recorded temperatures monitoring (56 degrees C (core temperature) for 30 continuous minutes) of each treatment.

g. Shipping. Prior to shipment, the DoD Components shall inspect and treat, replace, or repack WPM that does not meet the requirements of Reference (c) using the most cost-effective solution that meets ISPM No. 15 requirements by the required delivery date. When the shipper is unable to provide compliant WPM, the shipper shall, as provided in its contract, subcontract for such services.

(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 in this Manual. Cargo utilizing WPM shall not be shipped to an ISPM No. 15 participating country without consignor verification of compliance.

(2) Determine Compliance Option. The DoD Components shall ensure 100 percent compliance with the phytosanitary measures and standards regarding shipments of WPM.

(a) If the consignor's inspection indicates the WPM does not comply with the guidelines in this Manual, the material shall not be offered for shipment.

(b) The shipper shall evaluate and select one of the remediation options in paragraph 1.e. of this enclosure to bring WPM into compliance prior to shipment to an ISPM No. 15 participating country or it shall be processed using the "DoD Pest Free" certification as directed in section 4 of this enclosure prior to shipment to a non-ISPM No. 15 participating country.

(c) 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) and shall be completed via an SF 1080.

(3) International Shipments. International requirements are enforced by individual member states. Therefore, inspection criteria shall be dependent on the location of the member state's port of debarkation. If the member state's inspection procedures are published or documented, these shall be included in the appropriate section (by theater or individual country) of the Defense Transportation Regulation (Reference (n)).

(a) If member state inspectors frustrate shipments for WPM that does not meet the requirements in ISPM No. 15, common practice (for customs and agriculture clearance problems) dictates the shipments be segregated and held pending determination of remedial action.

(b) The same rules for compliance to Reference (c) apply for foreign military sales (FMS) shipments, with one exception. In those exceptional circumstances when only old wood (e.g., ammunition containers that do not meet the requirements in Reference (c)) is available for an FMS case to an ISPM No. 15 participating country, the purchaser should be given the option to wait for a new procurement of ISPM No. 15 compliant WPM or to pay for remediation costs.

(c) Shipments to non-ISPM No. 15 participating countries (or to FMS countries waiving the ISPM No. 15 requirement) shall be certified using the "DoD Pest Free" certification as directed in section 4 of this enclosure.

(4) Frustrated Shipments. If shipments are frustrated by a member state, the carrier (military or commercial, as contracts may require) shall notify the consignor (shipper) or consignee (addressee) to determine required actions.

(a) At this point, the DoD shall exercise actions or options depending on the circumstances of the quarantined or frustrated shipment.

(b) The nearest DoD Component WPM certifying activity shall remediate frustrated shipments using appropriate means depending on circumstances, carrier policies and procedures, and host nation, state, or local requirements. Complete documentation of the discrepancy and

recoup remediation costs from the last identified shipper of the material according to the directions in Reference (m).

(c) DoD shipments frustrated by a member state at the port of debarkation or any reports of noncompliance requiring intervention shall be reported to the Combatant Command and the owning DoD Component for resolution as required.

(d) The DoD Component who is responsible for the shipment is responsible for the costs to allow the shipment of goods using “DoD Pest Free” WPM and dunnage.

2. 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. Audit and enforcement shall include on-site inspections and may include the use of a centralized DoD Web-based program. Each activity certifying WPM shall be audited in accordance with the DoD procedures in paragraphs 2.a. through 2.f. of this enclosure.

a. Monthly Reports. The DoD Components shall provide monthly reports, coordinated through their chain of command, to the DoD WPM Website (<https://tarp.navsisa.navy.mil/wpm>) or other Component-specified reporting requirement.

(1) A lumber usage report shall be prepared (even when totals equal zero) identifying 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 rollup of lumber usage for ISPM No. 15 certification shall be provided as specified in this section.

(2) The reports must be posted to the DoD centralized website or are due as specified in the other DoD Component-specified reporting requirement within 2 weeks of the end of the reported month.

(3) Activities fabricating new WPM or repairing WPM with new HT certified lumber and applying the ISPM No. 15 certification mark shall track at a minimum:

(a) Lumber receipts, including the receipt or requisition number, mill code, lumber National Stock Number (NSN) or identification number, lumber thickness, lumber width, lumber length, quantity received, and date of receipt. This information shall be maintained at the activity level for verification during on-site audits.

(b) 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 shall be maintained at the activity level for verification during on-site audits.

b. Audits. To ensure the correct and responsible use of the ISPM No. 15 certification mark, DoD procedures to audit and inspect the DoD certifying WPM program shall be observed. Audits complying with the DoD self-certifying WPM program shall be defined in each DoD Component's internal implementing instruction. Minimum required information for auditing is provided in this Manual. The DoD WPM Website provides online 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 in subparagraph 2.b.(1) and paragraph 4.e. of this enclosure that is compatible with its requirements.

(1) Audit Methods. The DoD Components shall use one or more of the following methods for auditing their organizations:

(a) 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.

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

(c) Audits conducted by the DoD Component command inspectors or auditors shall conform to the intent of procedures and information within Reference (c) and as noted in this Manual.

(d) Audits shall be conducted using a combination of the DoD report program as outlined in paragraph 2.a. of this enclosure and on-site audits at consolidation hubs, nodes, or sites. These audits shall be conducted using trained, independent, impartial inspectors. This option conforms to the procedures and information within Reference (c). The DoD Components electing this method shall comply with the procedures in subparagraphs 2.b.(1)(d)1.through 2.b.(1)(d)5.:

1. Reports for DoD Components authorized to apply the ISPM No. 15 certification mark shall be validated on a monthly, quarterly, semi-annual, or annual basis as determined by each DoD Component.

2. Each reporting activity shall register its DoDAAC and site custodian via the DoD WPM Website.

3. Each reporting activity shall register its DoDAAC and site auditor via the DoD WPM Website.

4. Each validating activity shall register its DoDAAC and WPM program manager via the DoD WPM Website.

5. The WPM program manager or DoD Component point of contact (POC) shall validate the monthly reports (see paragraph 2.a. of this enclosure).

(e) Trained auditors shall perform annual on-site audits. They shall:

1. Physically inspect certified material stamped or stenciled with a certification mark to ensure compliance.

2. Document discrepancies and compliance data online or forward documentation to the WPM program manager or DoD Component WPM POC for comparison with online, collected report verification data.

3. Review the records of all incoming lumber, outgoing WPM, and shipments containing WPM to ensure compliance.

4. Review personnel training records to verify that workers involved with WPM have successfully completed the DoD web-based training course once every 2 years (see paragraph 2.f. of this enclosure).

5. Ensure the activity maintains proper control of the certification marking devices.

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 via the DoD WPM website, <https://tarp.navsisa.navy.mil/wpm>.

(2) Consequences of Audit Failure or Noncompliance

(a) Commercial and DoD Component activities repairing or fabricating WPM to ALSC/NWPCA requirements shall receive warnings, suspensions, and withdrawal of ALSC quality stamp marking privileges for noncompliance as specified in the ALSC/NWPCA enforcement regulations.

(b) When audit failures or validated shipping discrepancies are reported, DoD site-certified WPM activities shall implement this process:

1. First Audit Failure/Reported Noncompliance. After notification of an audit failure:

a. Within 15 days, the site custodian shall provide written analysis of the problem and a proposed solution to the responsible auditing organization and to the DoD Component WPM POC.

b. The site shall be re-audited within 30 days to determine if process improvements have been implemented and are sufficient to resolve the discrepancy.

2. Second Audit Failure/Reported Noncompliance. An audit failure within 30 days of the first audit failure:

a. Within 15 days of the second failure, the site custodian will provide written analysis of the problem and proposed solution to the responsible auditing organization and to the DoD Component WPM POC.

b. The site shall be re-audited within 30 days by the WPM program manager or WPM Component POC to determine if process improvements have been implemented and are sufficient to resolve the discrepancy.

3. Third Audit Failure/Reported Noncompliance. Another audit failure within 60 days of the first audit failure:

a. 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 contract with an ALSC accredited auditor for monthly commercial inspections, contract for acquisition of compliant WPM 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.

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

c. After 1 year, the site may reapply for DoD site recertification. All wood fabricators and packers shall retake the individual certification test for site wood packaging recertification.

c. DoD Site Certification. Each DoD Component is responsible for developing, distributing, and performing an initial audit and annual audit thereafter of its self-certified WPM sites to ensure that each meets ISPM No. 15 requirements. As a minimum, the DoD certified WPM site commander shall:

(1) Establish and appoint in writing at least one WPM site custodian at each local certified site. The site custodians shall be responsible for maintaining WPM data for audit purposes.

(2) Establish and appoint in writing at least one WPM site auditor for each local certified site. The site auditors shall be responsible for performing the annual audits.

(3) Maintain records of individuals who passed the DoD WPM Web-based training course (see paragraph 2.f. of this enclosure).

(4) Maintain documents pertaining to the number of ISPM No. 15 certification marking devices in the custody of the location.

(5) Maintain records of ISPM No. 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.

(6) Maintain accurate records required by section 2 of this enclosure.

(7) Segregate compliant HT lumber from nonconforming lumber by no less than 4 feet. This ensures the sawyer does not mistakenly select the wrong lumber while cutting boards for fabrication of compliant WPM.

d. 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.

e. 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.

f. Training. The DoD Components shall use the DoD comprehensive WPM Web-based training course at <https://tarp.navsisa.navy.mil/wpm>. It is available to all Service, DoD civilian, and contractor personnel operating Government-owned, contractor-operated facilities. The course addresses and provides self-certification and familiarization training. Personnel shall retake the training once every 2 years to ensure currency with IPPC, USDA APHIS, and DoD WPM policy and procedural changes. Following completion of the training, personnel shall print their training certificate and provide it to their site custodian as documentation that is verified during site audits.

3. AUDIT INSPECTION GUIDE

a. Introduction. These minimal compliance inspection items apply to all DoD Components' WPM fabrication and shipping activities. Inspectors shall use the checklist in paragraph 3.b of this enclosure to determine the level of compliance. Inspectors shall assign "Yes" or "No" to each checklist item and include brief comments explaining each "No" response and any additional comments the inspector believes may be of value to the sponsor. Each DoD Component may have additional WPM audit items or a form that reflects Component-specific requirements. Audit Checklist is also available on the WPM Compliance website (<https://tarp.navsisa.navy.mil/wpm>).

b. Inspection Checklist

(1) [NONCRITICAL] Does the site custodian have access to the most current WPM policy and procedural guidance? (See paragraph 2.f. of this enclosure.)

(2) [NONCRITICAL] Have all required site personnel successfully completed the WPM Certification Training within the past 2 years?

(3) [CRITICAL] Are the WPM certification stamps secured and only being used by personnel that have successfully completed the DoD Web-based training course? (See subparagraph 2.b.(1)(e)4. of this enclosure.)

(4) [CRITICAL] Does the organization have procurement documentation for the last 2 years showing that all lumber procured by the organization was certified HT lumber? (See subparagraph 2.a.(1) of this enclosure.)

(5) [CRITICAL] Does the organization have work orders or other approved documentation for the last 2 years showing the amount of board feet used? (See subparagraph 2.a.(2) of this enclosure.)

(6) [CRITICAL] For each month during the last 12 months is the amount (in board-feet) of certified HT wood used equal to or less than the amount (in board-feet) of procured plus on-hand certified HT wood? (See paragraph 2.a. of this enclosure.)

(7) [CRITICAL] Does each shipment inspected, certified, and marked with the DoD “Pest Free” certification mark document:

(a) NSN.

(b) Quantity of WPM by type.

(c) Transportation Control Number (TCN) or requisition number.

(d) Tested moisture percentage.

(e) A statement that the wood contained no bore or grub holes larger than 3 mm or 1/4 inch, no presence of visible bark, and no other sign of pest infestation. (See section 4 of this enclosure.)

4. DoD “PEST FREE” COMPLIANCE PROCEDURES

a. Purpose. The DoD “Pest Free” process is for temporary and emergency situations and may not preclude the establishment of a compliance program. These procedures can be used for two purposes:

(1) For Imports Back Into the United States. The DoD “Pest Free” inspection process and certification marking is accepted by USDA APHIS and Customs and Border Protection of the Department of Homeland Security for imports into the United States of retrograde materiel contained in or on WPM according to Reference (d). All phytosanitary requirements in

Reference (e) would need to be met per References (d) and (e). The DoD “Pest Free” process can be used at the origin at locations outside the United States when:

- (a) There are no established host nation ISPM No. 15 programs;
- (b) There are austere conditions;
- (c) The WPM brought with the deploying force shall be returning directly to the United States; or
- (d) Existing WPM stored at a location outside the United States, with a valid date of pack earlier than December 31, 2007, is imported back into the United States.

(2) For Shipments to a Non-ISPM No. 15 Participating Country. When the final destination is a non-ISPM No. 15 participating country, the DoD shipper of origin certifies the WPM as DoD “Pest Free.” When the shipper of origin is another non-DoD governmental agency or the shipment is being transshipped and the final destination is a non-ISPM No. 15 participating country, the DLA depot receiving the materiel certifies the WPM using the DoD “Pest Free” inspection process defined in this Manual. A list of ISPM No. 15 participating countries shall be maintained and available to all DoD shippers via the DoD WPM Website at <https://tarp.navsisa.navy.mil/wpm>.

b. Certification. Under the conditions in subparagraph 4.a.(2) of this enclosure, WPM not in conformance with Reference (c) may be eligible for certification. DoD activities shall use the following procedures to determine the suitability of WPM for DoD “Pest Free” certification and markings per Reference (d).

(1) It shall be inspected to ensure the WPM is bark free, contains no bore holes larger than 3 mm, has a moisture content of less than 20 percent, and has no evidence of other insect infestations according to the procedures in American Softwood Lumber Standard (Reference (o)).

(2) All inspection criteria must be met, or the packaging shall be considered nonconforming and remedial action shall be performed in accordance with paragraph 1.e. of this enclosure.

(3) When packaging is inspected and determined to comply with the criteria in subparagraph 4.b.(2) of this enclosure, it shall be marked with the DoD “Pest Free” mark as stated in paragraph 4.c. of this enclosure.

c. DoD “Pest Free” Certification Marking. Certification and application of the DoD “Pest Free” certification marking (see Figure 4) is authorized if the material successfully passes the established moisture and visual inspection standards (see paragraph 4.b. of this enclosure) 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 DoD Components are only authorized to use “DoD” as the

DoD trademark when self-certifying. No extraneous markings are authorized. The DoDAAC provides identification (see Figure 4).

Figure 4. DoD “Pest Free” Certification Mark



d. 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.

e. Monthly Reports. In addition to the reports specified in paragraph 2.a. of this enclosure, DoD Component WPM POCs that are using the DoD “Pest Free” certification shall maintain records of certified material by documenting:

- (1) Requisition number or TCN.
- (2) Item NSN.
- (3) Moisture reading.
- (4) Results of visual inspection for boreholes larger than 3 mm in diameter and bark-free (Yes/No).
- (5) Quantity and type of WPM marked.
- (6) Inspector’s signature verifying that WPM meets DoD requirements and is properly marked; and the date of certification.
- (7) This information shall be maintained at the activity level for verification during on-site audits. Each requisition or document number is recorded as a single instance.
- (8) For the purpose of this report, quantity is the number of times the DoD “Pest Free” certification mark is used for those instances. A monthly rollup of the number of instances, type, and quantity of WPM certified DoD “Pest Free” shall be provided with the other WPM reports as specified in paragraph 2.a. of this enclosure.

f. Audits. In addition to the audit procedures in paragraph 2.b. of this enclosure, DoD Component activities using the DoD “Pest Free” certification shall follow all the requirements for DoD self-certifications as well as the methods for auditing their individual service or agency:

(1) Online Report Validation. Reports for DoD activities authorized to apply the DoD “Pest Free” certification mark shall be validated monthly using the WPM requirements specified in this Manual.

(2) On-Site Audits. See subparagraph 2.b.(1)(e) of this enclosure.

g. Consequences of Audit Failure or Noncompliance. See subparagraph 2.b.(2) of this enclosure.

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

(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.

(2) Maintain records of individuals who passed the DoD WPM Web-based training course (see paragraph 2.f. of this enclosure).

(3) Maintain documents pertaining to the number of DoD “Pest Free” certification marking devices in the custody of the location.

(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, 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.

(5) Maintain accurate records as required by paragraphs 2.a. and 4.d. of this enclosure.

GLOSSARY

PART I. ABBREVIATIONS AND ACRONYMS

ASD(L&MR)	Assistant Secretary of Defense for Logistics and Materiel Readiness
AFJMAN	Air Force Joint Manual
ALSC	American Lumber Standard Committee
APHIS	Animal and Plant Health Inspection Service
AR	Army Regulation
C	centigrade
CCP	consolidation and containerization point
cm	centimeter
DLA	Defense Logistics Agency
DLAI	Defense Logistics Agency Instruction
DLMs	Defense Logistics Manuals
DoDAAC	DoD Activity Address Code
DPPG	Defense Packaging Policy Group
F	Fahrenheit
FMS	foreign military sales
HT	heat treated
IPPC	International Plant Protection Convention
ISPM	International Standards for Phytosanitary Measures
KD	kiln dried
MB	methyl bromide
mm	millimeter
NAVSUPINST	Naval Supply Systems Command Instruction
NPPO	National Plant Protection Organization
NSN	National Stock Number
NWPCA	National Wooden Pallet and Container Association
OSB	oriented strand board
POC	point of contact
SDR	supply discrepancy report
SF	Standard Form

TCN	Transportation Control Number
USDA USD(AT&L)	U.S. Department of Agriculture Under Secretary of Defense for Acquisition, Technology, and Logistics
WPM	wood packaging material

PART II. DEFINITIONS

Unless otherwise noted, these terms and their definitions are for the purpose of this Manual.

activity. A unit, organization, or installation performing a function or mission, e.g., reception center, redistribution center, naval station, naval shipyard.

ALSC. The ALSC, composed of manufacturers, distributors, users, and consumers of lumber, serves as the standing committee for the American Softwood Lumber Standard (Reference (o)) and, in accordance with Reference (o), 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 and for the labeling of WPM produced under Reference (c).

auditor. A trained, independent, and impartial reviewer assigned by the WPM site commander or manager.

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.

debarked. Removal of bark from round wood (debarking does not necessarily make the wood bark free).

DoD Component WPM POC. The DoD Component's representative to the Defense Packaging Policy Group (DPPG) and any additional appointed personnel to assist the DPPG representative. The POC may validate command monthly reports located on the DoD WPM Compliance Website at <https://tarp.navsisa.navy.mil/wpm>, review all Component audits and has the authority to approve or disapprove them. The POC approves WPM certified personnel requiring reporting access to the DoD WPM Compliance Website.

dunnage. Wood packaging material used to secure or support a commodity but which does not remain associated with the commodity.

IPPC. An international treaty relating to plant health, to which over 157 governments, including the United States, 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.

ISPM. An international standard for phytosanitary measures adopted by the Conference of Food and Agriculture Organization of the United Nations, the Interim Commission on phytosanitary measures or the Commission on phytosanitary measures, established under the IPPC.

member state. A nation that is party to Reference (c).

NWPCA. The international trade association that represents manufacturers, recyclers, and distributors of pallets, containers, and reels.

pests. Any species, strain, or biotype of plant, animal, or pathogenic agent injurious to plants or plant products.

phytosanitary. Concerning plant health, including the protection of natural flora and plant products from direct and indirect damage by pests.

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.

processed wood material. Products that are a composite of wood constructed using glue, heat and pressure, or any combination thereof. Examples include plywood, particleboard, OSB, veneer, wood wool.

site auditor. Is a trained, independent, and impartial person assigned by the WPM site commander or WPM program manager who performs a WPM audit on one or more sites to ensure procedures are being properly followed and records are in compliance with the DoD guidelines. Completes regular audit reports using the Audit Checklist.

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. Maintains control of the certification marks and local lumber tracking records, has overall responsibility for DoD WPM compliance at their sites, ensures all required personnel have successfully completed the on-line WPM Certification Training, has a copy of the training certificates, and ensures personnel re-take the training at a minimum of every 2 years. Completes the required Lumber Usage Monthly Report and the DoD "Pest Free" certification Monthly Report to ensure DoD WPM compliance.

stock readiness. A DoD program involving the tasks needed to ensure that the proper condition of material in storage is known and reported, the condition is properly recorded, and the material is properly provided with adequate packaging protection to prevent any degradation to lower condition codes in accordance with DLAI 4145.4/AR 740-3/AFJMAN 23-231/NAVSUPINST 4400.100/MCO 4450.15 (Reference (p)). This program:

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

Includes the elements of care of supplies in storage (plus the functions related to the receipt, identification, classification, and packaging of material during the receipt process).

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.

transshipped. To transfer or to be transferred from one conveyance to another for re-shipment.

United States. The several States, the District of Columbia, the Commonwealths of Puerto Rico and the Northern Mariana Islands, American Samoa, Guam, Midway and Wake Islands, the United States Virgin Islands, any other territory or possession of the United States, and associated navigable waters, contiguous zones, and ocean waters of which the natural resources are under the exclusive management authority of the United States.

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.)

WPM compliance. Satisfying the intent and provisions of Reference (c), as implemented by the United States in accordance with Reference (l), U.S. allies, and other friendly governments.

WPM program manager. A subordinate command representative identified by a DoD Component as responsible for the WPM compliance program in their command. If no subordinate representative is assigned, duties revert to the WPM Component POC.