



Ship Type: All Trade Area: USA

Bulletin 458 - 03/06 - Getting Wood Dunnage into the US - Phytosanitary Certificates or Stamps? - USA

A Member has recently experienced difficulties regarding dunnage on a ship bound for US ports. Respecting strict US regulations concerning dunnage, the master of the ship has attempted to obtain a Phytosanitary Certificate for all dunnage at all ports where the ship is loading steel. The ship has successfully obtained such certificates for two previously visited ports, but was unable to get a certificate at the Port of Odessa. Local agents at the port advised the master that such certificates are no longer required by US authorities provided dunnage is duly stamped.

The master of the ship was concerned that when the dunnage is cut for the purpose of securing cargo, pieces of wood dunnage will be separated from the part that is stamped, and also that stamps may be damaged and made unreadable during the process of fitting the dunnage. Members may be interested in the following information provided to the Member concerned in this case:

1. It is correct that Phytosanitary Certificates are no longer required. The US regulations mirror the international ISPM Guidelines - marking of the material is required but certificates are not.
2. The problem associated with cutting of pre-marked dunnage pieces was an issue raised by the industry during drafting of the regulations. Unfortunately no provision was made to allow for this possibility in the regulations as published. Technically, then, individual pieces of dunnage which do not bear the appropriate treatment mark may be designated as a violation. However, the authorities are aware of this issue and advise that individual inspectors will have discretion to approve dunnage if a sufficient number of pieces are appropriately marked.
3. Importantly, we are currently in Phase II of a three-stage implementation scheme for the US regulations. In this Phase (1 February to 4 July), the regulations will be fully enforced with respect to cargo packaging (crates, pallets, etc.) - however, other materials including dunnage remain subject to the "warning only" program of Phase I. Therefore, although a warning might be issued with respect to non-compliant dunnage, we would not expect the authorities to take any enforcement action under the regulations with respect to dunnage during Phase II of the implementation scheme, even if un-marked cut dunnage is prevalent. Members should however be aware that Phase II of the implementation scheme terminates on 4 July 2006 - after that date the US regulations will be fully enforced as to all wood packaging material, including dunnage.

Please be aware of the following documents available to Members on the UK P&I Club website in support of this advice:

- [Current US requirements – Wood Packaging Material Including Dunnage](#)
- [Operating Procedures for Trade Community Regarding Implementation of the Wood Packaging Materials \(WPM\) Regulations.](#)

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