

<u>Different Import Scenarios for Wood, Wood Products and Bark under a no deal EU exit arrangement</u>

The main plant health risks to Great Britain are posed by the commercial trade in some conifer wood products from EU member states. This is because conifer wood with residual bark or isolated bark could harbour certain species of bark beetles that are present in continental Europe but are absent from GB<sup>1</sup>.

The import scenarios that follow outline the processes for different wood and bark products as information to importers handling EU material, or third country material transiting through the EU en-route to GB. These scenarios outline whether or not the product is controlled for phytosanitary purposes.

The following scenarios cover imports and exports into England, Scotland and Wales (GB). For further information on processes in Northern Ireland, <u>please</u> contact <u>DAERA</u>.

-

<sup>&</sup>lt;sup>1</sup> Please note that Portugal and certain parts of Spain have the added risk of conifer material being infested with Pine wood nematode and that controls on wood and bark of sweet chestnut and plane also apply

### Scenario 1 EU bark free sawn timber to a GB seaport with no phytosanitary relevance



Scenario 1 is a bulk shipment of square sawn (bark-free) conifer timber following its off-loading onto the quayside at a Humber port. The stickers and spacers used as wood packaging material

A GB importer/agent sourcing timber from EU member states in Scandinavia or the Baltic states would experience **no change** in import requirements:

- The importer/agent **would not** need to submit a registered forestry trader (RFT) application form to the Forestry Commission (FC) to import this material.
- The importer/agent **would not** require a quarantine release certificate (FC form PHF28 Certificate of Clearance) for this consignment.
- The importer/agent **would not** require a Phytosanitary Certificate as the material has no phytosanitary relevance.
- It is advised that the accompanying commercial documents clearly state that the material is bark-free/of no phytosanitary relevance. The importer/agent would not need to send a pre-notification form to their local FC Plant Health Inspector to initiate the inspection of the consignment before the material is due to land in GB.
- Plant Health Import Inspection fees would not be applied.
- The consignment **would not** be routinely stopped at the border<sup>2</sup> for phytosanitary checks.

2

<sup>&</sup>lt;sup>2</sup> The FC may complete random or intelligence led physical inspections at the first point of entry (POE), as they do currently

## Scenario 2 Currently EU Plant Passported sawn timber with bark to a GB seaport



Scenario 2 is waney edged larch cladding with residual bark which could accompany the consignments in scenario 1. If this was from the EU now it would normally be accompanied by a plant passport, issued by the Registered Forestry Trader in the country of export and be marked as kiln-dried (KD)

- The importer/agent **would need** to submit a registered forestry trader (RFT) application form to the FC to import this material.
- The importer/agent would need to ensure that the consignment is accompanied by a Phytosanitary Certificate (PC) issued by the Plant Health Authority in the country of export.
- The importer/agent would need to send a pre-notification form before the material is due to land in GB to their local FC Plant Health Inspector to initiate an inspection of the consignment.
- The importer/agent **would need** to send the FC the PC and bill of lading so that the FC can complete a 100% remote documentary and ID check. If there is a documentary infringement, the FC will follow up with the importer, which may be managed with a statutory notice.
- Plant Health Import inspection fees **would need** to be applied for remote documentary and identity checks.
- A Quarantine Release Certificate (QRC or FC form PHF28 Certificate of Clearance)
  would be issued to the importer/agent by the FC Inspector. The form should be
  retained with the consignment import documents and the importer/agent would
  not need to copy these documents to HMRC's National Clearance Hub, Salford.
- The consignment **would not** be routinely stopped at the border<sup>3</sup> for phytosanitary checks.

3

<sup>&</sup>lt;sup>3</sup> The FC may complete random or intelligence led physical inspections at the first point of entry (POE), as they do currently

## Scenario 3 - Third Country Material Transiting through the EU to a GB Seaport



Scenario 3 is a Russian exporter, exporting bark-free conifer material directly to GB via EU (it is in transit and has not been inspected previously by an EU Member State)

- The importer/agent **would need** to submit a RFT application form to the FC to import this material.
- The importer/agent **would need** to ensure that the consignment is accompanied by a Phytosanitary Certificate (PC) issued by the Plant Health Authority in the country of export.
- The importer/agent **would need** to send a pre-notification form at least 3 working days before the material is due to land in GB, to their local FC Plant Health Inspector to initiate an inspection of the consignment.
- The importer/agent **would need** to send the FC the PC and bill of lading so that the FC can complete a 100% documentary, ID check and physical plant health inspection at a GB POE.
- Plant Health Import inspection fees would need to be applied for documentary, identity and plant health check.
- A QRC will be issued to the importer/agent by the FC Inspector. The form should be retained with the consignment import documents and the importer/agent would need to copy these documents to HMRC's National Clearance Hub, Salford to affect a CHIEF release.
- The consignment **would be** stopped at the border.

# Scenario 4 - Third Country Material Transiting through the EU to a GB to a RoRo Port of Entry



Scenario 4 is a Russian exporter, exporting bark-free conifer material directly to GB via EU (it is in transit and has not been inspected previously by an EU Member State)

- The importer/agent would need to submit a registered forestry trader (RFT) application form to the FC to import this material.
- The importer/agent must either apply to the FC to authorise their premises as a Place of First Arrival (PoFA) or use a third party PoFA to facilitate plant health inspections.
- If the importer has had their trade premises authorised as a Place of First Arrival (PoFA), this will allow them to host checks inland. Alternatively the importer could also use a 3rd party PoFA, where they have such an agreement in place.
- The importer/agent would need to ensure that the consignment is accompanied by a Phytosanitary Certificate (PC) issued by the Plant Health Authority in the country of export.
- The importer/agent **must** send a pre-notification form at least 3 working days before the material is due to land in GB to their local FC Plant Health Inspector to initiate an inspection of the consignment.
- **Pre-border** the importer/agent **must** send the FC the PC and bill of lading so that the FC can complete documentary and ID checks.
- Pre-border, once completed the FC will issue a quarantine release certificate (QRC).
   The form should be retained with the consignment import documents and the importer/agent would need to copy these documents to HMRC's National Clearance Hub, Salford to affect a CHIEF release in advance of landing the consignment in GB.
- A physical plant health check will be completed on material by the FC at the PoFA inland.
- Plant Health Import inspection fees **will** be applied for documentary, identity and plant health checks **pre-border**.
- The consignment **would not** be routinely stopped at the border.

## Scenario 5 – Bark-free conifer material from Portugal to a GB seaport



Scenario 5 is a Portuguese exporter, exporting sawn conifer wood with residual bark to GB. This material is of phytosanitary relevance because of a long standing infestation of Pine Wood Nematode (PWN) in Portugal. The removal of bark from the timber does not address the plant health risk and therefore it remains of phytosanitary relevance

- The importer/agent would need to submit a registered forestry trader (RFT) application form to the FC to import this material.
- The importer/agent **would need** to ensure that the consignment is accompanied by a PC issued by the Plant Health Authority in the country of export.
- The importer/agent **would need** to send a pre-notification form before the material is due to land in GB to the FC to initiate an inspection of the consignment.
- The importer/agent **would need** to send the FC the PC and bill of lading so that the FC can complete a 100% remote documentary and ID check. If there is a documentary infringement, the FC will follow up with the importer, which may be managed with a statutory notice.
- Plant Health Import inspection fees **would be** applied for remote documentary and identity checks.
- A quarantine release certificate (QRC) will be issued to the importer/agent by the FC Inspector. The form should be retained with the consignment import documents but would not need to be copied to HMRC's National Clearance Hub, Salford.
- The consignment **would not** be routinely stopped at the border<sup>4</sup>.

<sup>4</sup> The FC may complete random or intelligence led physical inspections at the first point POE as they do currently

### Scenario 6 Wood Packaging Material WPM associated with goods from the EU



Scenario 5 is that all WPM moving between the UK and the EU must meet ISPM15 international standards by undergoing approved treatment and marking. All WPM may be subject to official checks either upon or after entry to the EU.

- Controlled wood packaging material (WPM) is usually supplied as pallets but also includes crates, boxes, cable drums, spools and dunnage, made from solid wood.
   WPM made entirely from processed wood, for example plywood, OSB and MDF is not controlled.
- WPM moving between the EU and third countries must comply with the requirements of the International Standard for Phytosanitary Measure No. 15 (ISPM15). ISPM15 reduces the risk of introducing and spreading quarantine pests found in WPM and involves WPM being treated and marked
- Currently, no solid wood WPM moving between the GB and the EU needs to meet the ISPM15 (except movement of solid wood WPM from Portugal and certain parts of Spain).
- If the GB leaves the EU with no deal, all solid WPM exported from GB to the EU and all solid WPM being imported from the EU to GB would need to be ISPM15 compliant. This means it must have undergone treatment and marking.
- This WPM guidance also applies to importing and exporting to Switzerland.
- Checks on WPM will continue to be carried out in the UK on a risk-targeted basis only. The plant health risk from WPM imported from the EU is not expected to change as a result of an EU exit.
- WPM or dunnage that is the same species and origin as a timber consignment that it and has phytosanitary relevance, will be regarded as meeting the same GB landing requirements as the timber consignment.
- WPM or dunnage that is the same species and origin as a timber consignment that it
  is associated with and has no phytosanitary relevance, will be regarded as meeting
  the same GB landing requirements as the timber consignment as declared on the
  phytosanitary certificate.
- WPM or dunnage that is not of the same species and origin as a timber consignment that it is associated with and has no phytosanitary relevance, must be ISPM15 compliant.

Contact your supplier or <u>TIMCON</u> if you need more advice about moving WPM if the UK leaves the EU with no deal.