(STDF/PG/460) Implementation of the International Standard on Phytosanitary Measures, ISPM 15:
Regulation of wood packaging material in international trade): An empirical analysis of how the regulation affects the economy of a group of countries in Africa

Qualitative results

Elissaios Papyrakis and Luca Tasciotti

Nairobi, Kephis, July 2017
Outline

• Introduction to the qualitative part of the project;

• Qualitative results and policy implications;

• Conclusions.
Methodology used

- **Qualitative** information have been collected by interviewing several stakeholders – both public and private; institutions and agencies outside the 4 countries have been interviewed too;

- **Micro** data have been gathered using structured surveys directed to WPM treatment facilities;

- **Macro** data on the trade flow and data on the trading partners have been collected;
Stakeholders interviewed
Stakeholders interviewed

We met with about 100 stakeholders during the 5 missions; some stakeholders have been contacted via phone.

<table>
<thead>
<tr>
<th>Public</th>
<th>Private</th>
<th>External</th>
</tr>
</thead>
<tbody>
<tr>
<td>NPPO</td>
<td>WPM manufacturer</td>
<td>IAPSC</td>
</tr>
<tr>
<td>Ministry of agriculture</td>
<td>WPM treating facility</td>
<td>EPPO</td>
</tr>
<tr>
<td>FAO</td>
<td>WPM repairer</td>
<td>CPU</td>
</tr>
<tr>
<td>Ministry of trade</td>
<td>Exporters</td>
<td>Conlegno</td>
</tr>
<tr>
<td>Ministry of Forest and</td>
<td>DHL company</td>
<td>SMHV</td>
</tr>
<tr>
<td>Fauna</td>
<td></td>
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<tr>
<td>Ministry of Development</td>
<td>Data collection companies</td>
<td></td>
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<tr>
<td>Phytosanitary services</td>
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<tr>
<td>Custom organization</td>
<td></td>
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<tr>
<td>Unido</td>
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</tr>
</tbody>
</table>
Qualitative results

- Phytosanitary inspections of goods different from fruits/vegetables are not always enforced;

- Lack of inspection manuals.
## Inspection guidelines

<table>
<thead>
<tr>
<th>Number of imported WPM</th>
<th>Share of imported WPM to be inspected</th>
</tr>
</thead>
<tbody>
<tr>
<td>&gt;10</td>
<td>Inspect all the units</td>
</tr>
<tr>
<td>11-100</td>
<td>10% or 5 units minimum</td>
</tr>
<tr>
<td>101-1000</td>
<td>2% or 10 units minimum</td>
</tr>
<tr>
<td>&gt;1000</td>
<td>1% or 20 units minimum</td>
</tr>
</tbody>
</table>
Qualitative results

- Phytosanitary inspections in Mozambique

[Map of Southern Africa with Mozambique, Zambia, Malawi, and Tanzania highlighted.]
Qualitative results

‘Treatment and application of the mark must always be under the authority of the NPPO’.

• NPPO sometimes fails in supervising the treatment facilities:
  i. it does not have the capacity;
  ii. the treatment facility does not communicate the NPPO when the treatment is done;
  iii. it is not allowed to enter the facilities premises;
  iv. not all the treating facilities have their own ISPM 15 mark;
  v. quantity of chemical used and length of the treatment.
Audits
Audits in other countries
Qualitative results

- Readability of the mark and components of the mark.
Non-readable marks
Components of the mark

<table>
<thead>
<tr>
<th>IPPC</th>
<th>CM^{(b)} - 000-AA-SQV^{(c)}</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>YY^{(d)}</td>
</tr>
<tr>
<td></td>
<td>(e) _______________________</td>
</tr>
<tr>
<td></td>
<td>(f) _______________________</td>
</tr>
<tr>
<td></td>
<td>(g) _______________________</td>
</tr>
</tbody>
</table>

a. Le symbole comportant l'abréviation en anglais IPPC est mise pour désigner « La Convention Internationale pour la Protection des Végétaux » en français CIPV.
b. CM désigne le Code ISO du Cameroun suivi de OOO-AA-SQV (c) le numéro d'identification unique assigné par la Direction de la Réglementation et du Contrôle de Qualité des Intrants et Produits Agricoles à l'entreprise de fabrication ou de production des matériaux à base de bois.
d. YY désignant le code ISO du traitement effectué.
   - HT pour traitement thermique,
   - MB pour le traitement au Bromure de Méthyle,
   - PH3 pour la fumigation à la phosphine.
e. La date de traitement
f. Le code de l'institution chargée du marquage
g. N° du lot traité
Qualitative results

• Lack of guidance from the NPPO;

• No record of invasive alien species nor of WPM interceptions;

• There are a number of facilities repairing broken WPM
  ➔ the end result looks like a seemingly treated WPM;
Re-assembled (unt)reated WPM
Qualitative results

- Not all the stakeholders are aware of the standard;
- No clear communications between NPPOs and the other stakeholders about the standard existence and its implementation.
Anúncio

A Direcção Nacional de Serviços Agrários, toma público que de acordo com o Padrão Fitosanitário Internacional nº 15, estabelecido ao abrigo da Convenção Fitosanitária Internacional-IPPC/FAO, toda a madeira usada para como embalagem, assim como paletes que condicionam produtos para a exportação estão sujeitas a um pré tratamento por fumigação com o bormeto de metilo ou tratamento a quente segundo o preconizado neste padrão.

Referir que todo o material tratado ao abrigo deste padrão deve levar um carimbo definido pelo Departamento de Sanidade Vegetal.

Assim, a Direcção Nacional de Serviços Agrários convida a todas as empresas de procura do serviço de fumigação interesadas em implementar esta actividade para solicitarem a sua inscrição junto ao Departamento de Sanidade Vegetal, situada na Av das Forças Populares nº 3658, no recinto do IIAM, pavilhão Novo 1º andar direito, Maputo. Telefax: 21 460591, para o seu licenciamento.

O Director Nacional
Qualitative results

• Confusion about the treatment to be used and the content of the stamp;
PH3 accepted as a treatment

ARRETE N° 003/06/A/MINADER/SG/DRCQ/SDRSQV/SQV du 03 AVR 2006 fixant les modalités de traitement et d'estampillage des matériaux d'emballage et des emballages à base de bois destinés au commerce international.

d. YY désignant le code ISO du traitement effectué.

- HT pour traitement thermique,
- MB pour le traitement au Bromure de Mélhyle,
- PH3 pour la fumigation à la phosphine.
Qualitative results

- Facilities treating WPM do not have their own ISPM-15 stamps ➔ difficult to track them down;

- NPPOs and other stakeholders believe that treated WPM will last 3 months, and after that the WPM has to be re-treated;

- No communications between exporting companies and NPPOs ➔ some exporting companies buy WPM from facilities which do not have the treating license anymore.
Qualitative results

• Role of the IAPSC?
Summary of the qualitative results for Botswana

- **NPPO**
  - **Import**
    - Inspection not enforced
    - Imports mainly arriving via South Africa
  - **Export**
    - MB treatment
    - No audit from NPPO
    - Used for exports to South Africa

- **IAPSC**
  - **Import**
    - Meat related goods
  - **Export**
    - WPM repairer
Summary of the qualitative results for Cameroon

NPPO
- Import
  - Lack of inspection guidelines
    - Non fruits and veg. imported goods non inspected
- Export
  - IIT
  - MB
  - 12 facilities?
  - WPM repairers

IAPSC

- Export
  - Are they audited?
  - MB facilities do not have a unique stamp
  - Export to the world
Summary of the qualitative results for Mozambique

NPPO

Import

- Inspection guidelines in place

Export

- HT
- WPM Repairer

IAPSC

Are goods exported by neighboring countries inspected?

Facilities audited?

Goods exported to the World

1 facility waiting for the license
Summary of the qualitative results for Kenya

- **Import**
  - Inspection of non fruits-veg. not enforced

- **Export**
  - Audits: lack of guidelines
  - Case of stamp used by non-licensed facility
  - Goods exported to the world

- **NPPO**

- **IAPSC**
  - HT
  - MB
  - WPM Repairer

- NPPO and IAPSC are connected with arrows indicating the flow of information or processes related to import and export.

- Goods exported to the world is linked to both Import and Export pathways, indicating the final stage of the export process.

- Audits: lack of guidelines is connected to Export, highlighting an issue in the guidelines for inspections.

- Case of stamp used by non-licensed facility is connected to Export, emphasizing a regulatory concern.

- Inspection of non fruits-veg. not enforced is connected to Import, indicating a concern in the inspection process.

- The diagram illustrates the flow and potential issues in the regulatory and inspection processes for Kenya's import and export.
Recommendations and policy implications

- Investments in HT facilities;

- Role of the IAPSC: It would be good that IAPSC sets common procedures to implement and comply with the standard;

- Solar panel run HT facilities;

- Do not fully grasp the severity of the consequences that non-compliance to ISPM 15 may have at the country level;

- Internet based list with all the authorized facilities.
Recommendations and policy implications

• Importing countries require the WPM they are importing to be treated either using HT or MB and not either or;

• How to address the problem related to make the ISPM15 stamp not replicable;

• The employment rate has not been affected by the introduction of the standard;

• ISPM15 implementation has caused different effects across sectors;

• Policy makers can use the above information to highlight the sectors that have benefitted the least -or even became disadvantaged- and to derive ad-hoc policies.