

Implications of leaving the EU without a deal on plant health controls on importing and exporting wood, wood products, isolated bark and wood packaging material¹

Overview

Leaving the EU with a deal remains the Government's top priority. It remains the case that the only way to rule out no deal is to agree a deal – the Prime Minister has been consistent on this. An Article 50 extension would not rule out no deal. So, the Government will continue with its no deal preparations to ensure the country is ready for every eventuality. Businesses and the public should ensure they are prepared for EU Exit.

Our plant health biosecurity arrangements protect the environment from pests and diseases and we will continue to protect the nation's plant health biosecurity during and after our exit from the EU. Our work to prepare for EU Exit will ensure that biosecurity standards will continue to be met in ways that support trade and the smooth flow of goods.

Further information is available as follows:

[`Importing and exporting plants and plant products if the UK leaves the EU without a deal`](#)

1. What plant health processes will change and what will a no deal scenario mean for the importing of wood, wood products and isolated bark?

Importing wood, wood products and isolated bark directly from third countries.

For imports direct from third countries, there will be no change to current processes with the exception of some Roll-on-roll-off (RoRo) imports, and imports of ash from North America as detailed in the following paragraphs.

Importing wood, wood products and isolated bark directly from the EU.

The UK will no longer have access to the EU plant passport regime. Consignments of wood, wood products and isolated bark currently managed under the EU plant passport regime will therefore require a phytosanitary certificate issued in the country of export. The specific import requirements that need to apply to EU material will be set out in the Plant Health (EU Exit) Regulations 2019 in relation to England².

Before they commence importing controlled material, businesses will need to become a

¹ Please refer to [separate guidance for EU Timber Regulations](#)

² [Plant Health \(Amendment\) \(England\) \(EU Exit\) Regulations 2019](#)

[Registered Forestry Trader](#) (if they are not already registered) by applying to the Forestry Commission (FC). Importers in Northern Ireland should consult their [local plant health authority](#) and for more information contact [DAERA](#). Alternatively businesses may appoint the services of an import agent that is registered as a forestry trader.

Registered forestry traders are required to pre-notify the FC before the landing of controlled material at sea ports and airports. Pre-notification forms can be [downloaded](#) and completed with inspection request details and sent to local inspectors by [email](#).

Enclosures should include a scanned copy of the original phytosanitary certificate and commercial documents for documentary and identification checks. Consignments of wood, wood products and isolated bark from EU countries will **not** be stopped at the border for quarantine checks. FC Plant Health Inspectors will carry out the documentary and identity checks remotely. When checks are complete, a form (PHF28) will be issued to the importer for the purpose of recovering fees. This will be separate to any customs release. These checks will be charged for by the FC, see [here](#) for standard fees (to be amended as part of the Plant Health (Amendment) (EU Exit) Regulations 2019).

There will be no change in the arrangements that apply to all sawn wood which is free from bark and is not currently controlled.

See Annex 1 for a full explanation of what constitutes controlled material from EU countries.

2. What will importers need to do to import controlled third country goods entering GB via the EU?

Wood, wood products and isolated bark that come from third countries and are checked by an EU member state will be allowed to move onward to GB as an EU import, as set out in section 1 above, provided that they meet the landing requirements of GB for certain forestry pests.

Where no plant health checks are carried out by an EU member state, for example because they are placed into a customs transit procedure, the consignment will be treated as a third country import and will require physical plant health checks to be conducted on entry to GB. This will apply to both containerised and bulk consignments.

Before they commence importing controlled material, businesses will need to become a [Registered Forestry Trader](#) (if they are not already registered) by applying to the FC. Alternatively businesses may appoint the services of an import agent that is registered as a forestry trader.

To ensure frictionless trade and minimal business impact, businesses wishing to continue to import third country goods into GB via the EU at RoRo ports (Annex 2), physical plant health checks will need to be facilitated inland. This can be done at the importer's own pre-approved premises, known as the Place of First Arrival (PoFA), the importer may use

the services of an agent with an approved premises, or the goods may be diverted to a [point of entry \(POE\)](#) that can accommodate checks at the border.

Businesses wishing to authorise their premises as a PoFA will need to meet certain standards and apply to the FC Plant Health Service for authorisation. For guidance on how to apply, please refer to [Wood and timber products: approval and operation of plant health inspection facilities at place of first arrival](#) and complete the [Wood and timber: approval of premises as a place of first arrival application form](#). The importer could also use a 3rd party PoFA, if they have such an agreement in place.

Businesses will need to pre-notify arrival of third country consignments which have not had plant health checks carried out in the EU to local FC Plant Health Inspectors, and specify where the consignment will be held whilst awaiting checks. Pre-notification must take place three days before arrival for consignments arriving by sea, and 24 hours before arrival for consignments arriving by air freight.

The consignment will be held at the port or PoFA until the FC Inspector has carried out the necessary checks and released the goods. These checks will be [charged](#) for by the FC.

Importers of ash wood from the USA or Canada that is currently imported under the EU Derogations (Commission Implementing Decisions [2018/1203](#) and [2016/412](#) respectively) will, in the future, need to be authorised to do so via a licence issued by the Forestry Commission. The current derogations are independent agreements between the EU, Canada and the USA, and not the UK. The UK is putting in place new legal provisions to allow the trade in ash wood to continue under licence, so long as it meets the same requirements as the EU derogations. Further details on the authorisation and licensing arrangements will be provided by the FC in the near future.

3. What will exporters need to do to export wood, wood products and bark from GB to the EU in the event of no deal?

When the UK leaves the EU, the UK will be treated as a third country and will need to meet EU third country import requirements to export controlled wood, wood products and isolated bark to the EU. This includes controls on all wood packaging material used in the shipment of goods of all kinds.

For exporting wood, wood products and isolated bark to the EU:

Phytosanitary certificates will be needed in order to supply certain wood and wood products to meet the import requirements of different EU member states.

Businesses will need to apply to the FC to request a phytosanitary certificate before material is exported using the form on our [website](#). There is a [charge](#) for this service.

Please note that separate checks on controlled exported material may take place at the EU country of destination.

There will be no change in the arrangements for non-controlled material.

See Annex 1 for further detail on the controlled materials.

Wood Packaging Material – import/export and EU countries:

Wood packaging material (WPM), including pallets, crates, boxes, cable drums, spools and dunnage, moving between the UK and the rest of the EU does not currently need to meet International Standard for Phytosanitary Measure No. 15 (ISPM15) requirements and can move freely without checks or controls. WPM moving in and out of Portugal and parts of Spain must conform to ISPM15 standards, owing to the presence of Pine Wood Nematode.

If the UK leaves the EU without a deal, all WPM moving between the UK and the EU will need to be ISPM15 compliant (treated and marked). These products may be subject to official checks either upon entry to the EU or after entry.

This WPM guidance also applies to importing and exporting to Switzerland.

The UK operates the United Kingdom Wood Packaging Material Marking Programme (UKWPMMP) which helps UK manufacturers and exporters comply with ISPM15. Details of how to join the UKWPMMP can be viewed at www.ukwpmmp.org.

For exports to third countries from GB:

There would be no change to the current procedures.

Please address any queries relating to the above information to:

Forestry Commission, Plant Health Service, Silvan House, 231 Corstorphine Road
Edinburgh, EH12 7AT.

T: 0300 067 5155

F: 0131 316 4344

E: plant.health@forestrycommission.gov.uk

Annex 1: Controlled material³

Imports into GB from the EU of Conifers (wood³ and isolated bark³ of conifers)

[Plant Health \(Amendment\) \(England\) \(EU Exit\) Regulations 2019 Schedule 4 PART A Items 4 and 25.](#)

Requirements: Wood shall be bark-free, or in the case of wood or isolated bark shall be accompanied by a Phytosanitary Certificate confirming that;

(a) wood or isolated bark originates in an area known to be free from the conifer bark beetles; *Ips amitinus*, *Ips duplicatus* and *Ips typographus*, or

(b) in the case of

i. wood, that it has been kiln dried to below 20% moisture content and a mark of 'Kiln Dried' or 'KD' put on the wood or its packaging

ii. isolated bark has been subjected to fumigation or other appropriate treatment against bark beetles

Emergency measures for Pine Wood Nematode

[Plant Health \(Amendment\) \(England\) \(EU Exit\) Regulations 2019 Schedule 4 PART D Item 16.](#)

Requirements:

(a) In the case of wood, including bark, the wood:

(i) must be accompanied by an official statement that it has undergone appropriate heat treatment in an officially authorised treatment facility to achieve a minimum temperature of 56 °C for a minimum duration of 30 continuous minutes throughout the wood or bark to ensure freedom from live *Bursaphelenchus xylophilus* (Steiner & Bühner) Nickle *et al.* and live *Monochamus spp.*, and

(ii) if it is not free from bark, be moved from the area outside the flight season of *Monochamus spp.* or with a protective covering to prevent its infestation with any *Bursaphelenchus xylophilus* (Steiner & Bühner) Nickle *et al.* or *Monochamus spp.*

³ Please refer to notes section at the end of this Annex for definitions

In the case of any wood, other than wood packaging material, which is not free from bark, the wood must not have been moved through any other area in the European Union which has been established in accordance with Article 5 of Decision 2012/535/EU

(b) In the case of wood in the form of beehives or bird nesting boxes:

(i) must have undergone an appropriate heat treatment in an authorised treatment facility to achieve a minimum temperature of 56 °C for a minimum duration of 30 continuous minutes throughout the wood and bark to ensure freedom from live *Bursaphelenchus xylophilus* (Steiner & Bühner) Nickle et al. and live *Monochamus spp.*, and

(ii) be accompanied by an official statement that it has undergone that treatment or display a mark in accordance with Annex 2 to ISPM No. 15 indicating that it has been subject to an approved phytosanitary treatment in accordance with this international standard, and

(iii) if it is not free from bark, be moved from the area outside the flight season of *Monochamus spp.* or with a protective covering to prevent its infestation with any *Bursaphelenchus xylophilus* (Steiner & Bühner) Nickle et al or *Monochamus spp.*

GB exports to EU member states (wood and isolated bark of conifers)

For movement from GB to the Republic of Ireland (ROI) and other EU member states that have a relevant Protected Zone, a Phytosanitary Certificate will need to be applied for from the Forestry Commission.

Imports into GB from the EU of Plane (*Platanus*) (wood of *Platanus*)

[Plant Health \(Amendment\) \(England\) \(EU Exit\) Regulations 2019 Schedule 4 PART A Item 11](#)

Requirements:

Phytosanitary Certificate confirming that

(a) it originates from an area that is known to be free from *Ceratocystis platani* (or a protected zone for *C. platani* within the EU), or

(b) in the case of wood that it has been kiln dried to below 20% moisture content and a mark of 'Kiln Dried' or 'KD' put on the wood or its packaging.

Exports of Plane (*Platanus*) (wood of *Platanus*)

A Phytosanitary Certificate is required for exports to ROI.

Imports into GB from the EU of wood and isolated bark of *Castanea* (including sweet chestnut)

[Plant Health \(Amendment\) \(England\) \(EU Exit\) Regulations 2019 Schedule 4 PART A Item 10](#)

Requirements:

The wood shall be bark-free or accompanied by a Phytosanitary Certificate or confirming that:

- (a) it originates from an area known to be free from *Cryphonectria parasitica*, or
- (b) in the case of
 - i. wood that it has been kiln dried to below 20% moisture content and a mark of 'Kiln Dried' or 'KD' put on the wood or its packaging
 - ii. isolated bark that it has been subjected to fumigation or other appropriate treatment against *Cryphonectria parasitica* approved by the EU

Exports of wood and isolated bark of *Castanea* (including Sweet Chestnut)

A Phytosanitary Certificate required for exports to the Czech Republic, ROI and Sweden.

Notes

1. "wood" means-

(a) any wood which retains part or all of its natural round surface, with or without bark; or

wood in the form of chips, particles, shavings, sawdust, wood waste or scrap; and whether or not satisfying the requirements of paragraphs (a) or (b)-

dunnage, or

wood packaging material; and

"wood packaging material" means wood in the form of packing cases, boxes, crates, drums or similar packings, pallets, pallet collars, box pallets or other load boards in use in the transport of objects of any kind [Plant Health (Forestry) Order 2005].

2. "isolated bark" means bark which has been removed or become detached from a living, felled or fallen tree or from any part of such tree [Plant Health (Forestry) Order 2005].

3. "Bark-free wood": wood from which all bark, except in-grown bark around knots, and bark pockets between annual growth rings, has been removed [ISPM5].

Annex 2

Roll on Roll off Terminals in the UK

For a full list of Points of Entry, go to Annex III of the [Wood and timber products: approval and operations of plant health inspection facilities at place of first arrival.](#)