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13	Contaminating organisms affecting trade in wood commodities and
14	forestry products
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37 XXXX 2021

1 Virtual approval of NAPPO Products

2

Given the current travel restrictions brought about by the COVID-19 pandemic, the NAPPO
 Management Team unanimously endorsed a temporary process for virtual approval of its
 products.

- Beginning in January 2021 and until further notice, this statement will be included with each
 approved NAPPO product in lieu of the Executive Committee original signature page.
- 10 The Science and Technology Document *Contaminating organisms affecting trade in wood*
- 11 *commodities and forestry products* was approved by the North American Plant Protection
- 12 Organization (NAPPO) Executive Committee see approval dates below each signature and is
- 13 effective from the latest date below.
- 14
- 15 Approved by:
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1 1. INTRODUCTION

2

3 International trade is widely recognized as the primary pathway for the spread of plants, animals 4 (including insects, fungi and nematodes), and microorganisms, many of which are considered 5 plant pests. When introduced to new environments, these organisms are commonly referred to 6 as "non-indigenous" and can cause serious environmental, ecological, and economic damage if 7 they become pests (Liebhold et al., 1995; Allen and Humble, 2002). Non-indigenous pests can 8 move internationally in association with infested plant substrates such as live plants and plant 9 parts, including wood. In many cases, non-indigenous plant pests are unintentionally introduced 10 on an article or surface they are not infesting. These pests are referred to as hitchhiking or 11 contaminating pests. A contaminating pest is defined in the International Standard for 12 Phytosanitary Measures 5, the Glossary of phytosanitary terms¹ (ISPM 5) as: "a pest that is 13 carried by a commodity, packaging, conveyance or container, or present in a storage place and 14 that, in the case of plants and plant products does not infest them²". Important to this definition is 15 the concept of "infestation," which is defined by the International Plant Protection Convention 16 (IPPC) as "presence in a commodity of a living pest of the plant or plant product concerned. 17 Infestation includes infection" (ISPM 5). Infection refers to the invasion of tissues, which is a 18 defining difference between infesting and contaminating organisms. More generally, infestation 19 implies an intimate biological interaction between the infesting organism and its host whereby the 20 infesting organism derives nutrition or other necessary requirements to carry out its life cycle. In 21 contrast, contaminating pests lack this physiological or physical relationship (MAF, 2008; Lemay 22 and Meissner, 2008). Contaminating pests can be found on a wide range of surfaces, including 23 plants or plant products, conveyances (e.g., airplanes, ships), shipping containers, machinery, 24 vehicles etc.

25

26 The IPPC provides a framework for signatory countries, also known as contracting parties (CPs), 27 to develop harmonized standards with guidelines to reduce the international movement of pests 28 associated with the trade of plants, plant products and other regulated articles. The Convention 29 also recognizes that pests can move in association with packaging, conveyances, containers, 30 growing media or any other organism, object, or material capable of harboring or spreading plant 31 pests. For example, the International movement of used vehicles, machinery, and equipment 32 (ISPM 41, 2017) and the Sea Container Task Force (SCTF) provide guidance on the best 33 practices to reduce the spread of pests on commodities they do not infest (FAO, 2020a). 34

To determine whether an organism is a potential pest of plants and therefore subject to regulation, a pest risk analysis (PRA) is conducted by the importing country (ISPM 2, 2019; ISPM 11, 2019). This formal process, central to phytosanitary regulation, considers technical, scientific, and economic information to determine whether any organism can be considered a regulated pest. Regulated pests are recognized by the IPPC as guarantine pests or regulated, non-guarantine

¹ ISPM 5 is updated annually and is available on the International Phytosanitary Portal (IPP – www.IPPC.int) at: <u>https://www.ippc.int/en/core-activities/standardssetting/ispms/</u>

pests. PRA helps determine this distinction and what, if any, phytosanitary measures might be
 utilized to mitigate pests potentially harmful to plants and plant products.

3

NOTE: Initiation of a PRA involves the identification of pests or pathways for which a PRA is needed. By definition, a PRA must be conducted to determine whether an organism is a pest. This NAPPO science and technology document refers to species that contaminate commodities as *contaminating organisms* unless an organism has undergone PRA and has been identified as a pest or *contaminating pest*.

9

10 There are a number of pathways on which contaminating organisms may be transported. While 11 the scope of this document is restricted to contaminating organisms found with wood commodities 12 and wood packaging materials, it could be applicable to other commodities and types of 13 transportation (e.g., cardboard or plastic boxes). This document does not deal with inanimate 14 contaminants, such as straw or particulates. The biology of the contaminating organisms and 15 contaminating pests found with wood commodities, wood packaging materials, and conveyances 16 are described to inform NPPOs in the development of PRAs and subsequent phytosanitary policy 17 and measures.

18

19 **1.1 Objective**

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The objective of this NAPPO science and technology document is to provide scientific information on living contaminating organisms associated with trade of wood commodities and wood packaging material and their associated conveyances, and to provide support for policy decisions addressing phytosanitary risks.

25

26 2. CONTAMINATING ORGANISMS AND CONTAMINATING PESTS

27 28

8 2.1. What are considered contaminating pests by countries?

29

30 Contaminating organisms, which might meet the definition of contaminating pests on wood or 31 wood products, represent a wide variety of organism groups. These most notably include 32 vertebrates, insects, mollusks, seeds, and fungi. Incidence of these intercepted pests by importing 33 countries is subject to factors such as trade patterns, inspection activity, and seasonality, among 34 others. Individual countries differ in their pest interception data collection methods. Resultant 35 records often do not recognize "contaminating" as a distinct field, but close inspection of the interception data (e.g., pest species, commodity) may reveal if an interception should be 36 37 considered a contaminating pest.

38

Countries generally recognize quarantine pests through a regulated pest list, which also includescontaminating pests.

41

42 Canada, the United States, and Mexico each develop and maintain a list of regulated, quarantine

43 pests (and pollutants) under their respective plant protection acts (or standards), which must meet

44 the following criteria:

- 1 1. they meet the IPPC definition of a regulated pest
- 2 2. they must be a quarantine pest for all parts of the country
- 3 (Government of Canada, 1990; USDA, 2020a).
- 4

Mexico has compiled a list of quarantine pests and pollutants intercepted in various imported forest products and by-products. The list is published as part of the Official Mexican Standards (NOM, Secretaría de Medio Ambiente y Recursos Naturales, 2021) that regulate phytosanitary imports of forest raw materials, products and by-products, specifically natural Christmas trees; new sawn wood; and bamboo, wicker, vine, or rattan, as raw materials used in basketry or plaiting.

10

New Zealand's Biosecurity Organisms Register for Imported Commodities (BORIC) database allows users to find the status of quarantine pests, both regulated and non-regulated (New Zealand Ministry for Primary Industries, 2021). New Zealand and other countries also employ more generalized "Contaminant Charts" for the benefit of biosecurity inspectors at ports of entry (New Zealand Ministry for Primary Industries, 2020). Databases have been shown to be helpful to inspectors in differentiating between contaminating organisms and infesting quarantine pests.

17

18 **2.1.1. Interception data**

19

20 The difficulty of associating contaminating organisms with certain pathways due to their 21 opportunistic nature has been studied (Toy and Newfield, 2010). The most useful approach to 22 obtain this kind of information is the examination of interception data. Most, if not all, countries 23 conducting trade have instituted guarantine record-keeping systems designed to centralize 24 interception data storage for easy and reliable access, analysis, and protection. While interception 25 data can indicate entry pathways for contaminating organisms, it is difficult to quantitatively 26 analyze this type of data as different pathways have different levels of inspection, reporting, 27 identification, and recording (Turner et al., 2020). An examination of the interception data 28 gathered in the last twenty years for eight world regions (New Zealand, Australia, South Korea, 29 Japan, United States, Canada, United Kingdom, and the greater Europe and Mediterranean) 30 illustrates the lack of uniformity required for analysis (Rebecca Turner personal communication). 31 For example, the South Korean dataset includes only interception frequency per species, while 32 other countries like the United States of America record pathway, year, source country, and 33 interceptions identified largely to higher taxonomic levels. Most countries have some form of host 34 or commodity data column, but it's not always clear whether the intercepted specimen was 35 infesting the commodity or was a contaminating organism (Turner et al., 2020). The US Port 36 Information Network (PIN) database has a host proximity column with in/on/with options, but other 37 country's structure this differently. In many cases, contaminating status is based on limited 38 guarantine information. Overall, the data provide a first step to identifying the types of organisms that are moving in international trade. Currently, inspecting and recording contaminating 39 40 organisms presents challenges for global inspection protocols. Countries such as New Zealand 41 and Australia have largely used inspection of the vehicle pathway to focus attention on 42 contaminating ants, Asian gypsy moth (Lymantria dispar asiatica Vnukovskii, Lymantria dispar 43 japonica Motschulsky, Lymantria albescens Hori and Umeno, Lymantria umbrosa Butler, 44 Lymantria postalba Inoue) and brown marmorated stink bug (BMSB, Halyomorpha halys Stål).

1 Contaminating organisms and pests detected on imports to Australia were documented and 2 summarized in a recent Commission on Phytosanitary Measure recommendation (CPM; FAO, 3 2018). Organisms listed as contaminating pests included insects, plant diseases, weeds, seeds, 4 reptiles, scales, snails, slugs, and viruses. Additional analyses on the types of commodities 5 contaminated with organisms coming into Australia have been conducted as part of a pest risk 6 assessment for the contaminating pest brown marmorated stink bug (Australian Department of 7 Agriculture, 2019).

8

9 The US Agricultural Quarantine Activity System (AQAS) and, more recently, Agricultural Risk 10 Management (ARM) record guarantine activities conducted by the Department of Homeland 11 Security (DHS), Customs and Border Protection (CBP), and APHIS Plant Protection and 12 Quarantine (PPQ) at the ports of entry into the United States (USDA, 2011a). In Mexico, the 13 Forest Health Analysis and Reference Laboratory from SEMARNAT General Directorate for 14 Forestry and Soil Management has a database with records of organisms intercepted on 15 inspections of wood packaging, products, and by-products. Canada's NPPO, the Canadian Food 16 Inspection Agency (CFIA), in collaboration with the Canadian Border Services Agency (CBSA) 17 collects and identifies suspect interceptions on various commodities and records this information 18 in an internal database.

19

20 2.2 Wood commodities and conveyances that could carry contaminating 21 organisms

22

Virtually anything that moves in international trade - including commodities, packaging, and
 conveyances they move with can provide a surface for contaminating organisms. Furthermore,
 contaminating organisms can originate in any country from which shipments originate or transit
 through. As such, contaminating organisms are truly a global issue.

27

28 For the most part, existing literature on contaminating organisms and pest interception and 29 introduction is tied to a conveyance or pathway, not host or commodity, although there are 30 exceptions. Contaminating pests, by definition, are not associated with particular hosts or 31 commodities, although certain predilections do exist. For example, non-marine gastropods (snails 32 and slugs) are commonly found on ceramic, marble, and cement tile consignments (Robinson, 33 1999). The khapra beetle (Trogoderma granarium, Everts), a NAPPO region regulated guarantine 34 pest, is commonly associated with containers and conveyances where larvae that undergo long 35 periods of diapause can remain hidden in cracks and crevices (NAPPO, 2019a).

36

37 2.2.1 Conveyances

38

A conveyance is broadly defined as something that is used to transport goods or people. While any conveyance has the potential to carry a contaminating organism, this document will focus more specifically on conveyances that are used to transport wood products in international trade. These conveyances are larger and typically travel longer distances and thus represent the greatest risk of carrying contaminating organisms from one area to another.

1 Sea containers

2

3 Since approximately 90% of world trade travels inside sea containers they are an important 4 pathway for contaminating pest introductions. Sea containers may be referred to as shipping 5 containers, twenty-foot equivalent units (TEUs) or freight containers. A freight container is defined 6 in the Cargo Transport Code (CTU) "as an article of transport equipment that is of permanent 7 character and accordingly strong enough to be suitable for repeated use; specially designed to 8 facilitate the transport of goods, by one or other modes of transport, without intermediate 9 reloading: designed to be secured and/ or readily handled, having fittings for these purposes, and 10 approved in accordance with the International Convention for Safe Containers (CSC), 1972, as 11 amended. The term "freight container" includes neither vehicle nor packaging; however, a freight 12 container that is carried on a chassis is included" (IMO, 2014). 13

- A study on interior and exterior contamination of empty containers in New Zealand found soil and associated pathogens, plant product (seeds), invertebrates (insects, spiders, snails), and reptiles in decreasing order of incidence (Brockerhoff, 2016). To reduce the risk of contaminating organisms moving with sea containers, New Zealand designed and implemented a sea container hygiene system which includes certified best practices such as cleaning and pest control (MAF, 2009).
- 20

21 Additional documentation on the heightened pest risk of contaminating pests on or in sea 22 containers is widely available (Stanaway et al., 2001; Gadgil et al., 2002). In recognition of the 23 importance of this pathway, a draft International Standard for Phytosanitary Measures, Minimizing 24 pest movement by sea containers was added to the List of Topics for IPPC standards at CPM 3 25 in 2008 (Draft ISPM 2008-01). Most recently, the Sea Container Task Force (SCTF) has worked 26 to determine if interim solutions have been effective and will make a recommendation at the end 27 of 2021 to the CPM regarding the results of the initiative to raise awareness around the importance 28 of sea container cleanliness. The SCTF recently published guidance on the best practices to 29 reduce the spread of pests on commodities they do not infest (FAO, 2020a).

30

The North American Sea Container Initiative (NASCI) is working to provide guidance to border protection agencies and global shipping container companies for cleaning and inspecting sea containers (NAPPO, 2019b). NASCI compliments the International Maritime Organization's Code of Practice for Packing Cargo Transport Units (IMO, 2014). Since the CTU Code was updated in 2014, a supplementary document, *Prevention of Pest Contamination of Containers: Joint Industry Guidelines for Cleaning Containers*, was prepared in 2016 (COA *et al.*, 2016).

37

38 Maritime vessels

39

40 Maritime vessels are similarly involved in contaminating organism movement and offer a range of 41 opportunity for organisms on decks, holds and stores (Lemay and Meissner, 2008). Asian gypsy 42 moth (AGM) egg masses on ships are routinely intercepted in North America and other countries 43 that have formal inspection programs which specifically target this pest (see section 3.7.1). In

44 New Zealand, the burnt pine longicorn beetle, Arhopalus ferus (Mulsant), is a regular hitchhiker

on timber cargo being shipped to Australia and has been more effectively managed with an
 improved understanding of pest biology and climatic data (Pawson, 2009).

3

4 Trucks and trailers

5

6 Reports of contaminating organisms on land transport are generally less well documented 7 (Meurisse et al., 2019). A great number of trucks, trailers and trains are used to forward sea 8 containers, an important consideration in fully characterizing the truck, trailer and train 9 conveyance pathway. Transport data from the Organization for Economic Cooperation and 10 Development (OECD) demonstrate that road and rail are predominant modes for both freight and 11 passenger transportation in most countries (ITF, 2017; Meurisse et al., 2019). Field observations 12 of European gypsy moth (Lymantria dispar L.) egg masses on the surface of commercial land 13 carriers are commonplace, and adults of emerald ash borer (Agrilus planipennis Fairmaire) are 14 known to advance secondary spread in this manner (Buck and Marshall, 2009). Spotted lanternfly 15 (Lycorma delicatula (White)) egg masses, nymphs, and adults can be transported on non-plant 16 structures such as outdoor equipment and transports such as all-terrain vehicles, trailers, lawn 17 tractors, and trucks (Pennsylvania Department of Agriculture, 2019). The potential for moving 18 contaminating organisms, including those of guarantine significance, by land transport varies 19 considerably and depends on pest life stage, time of year, and frequency of transport among other 20 factors.

21

22 Compared to active land transport, there is considerable information on new and used vehicles 23 as shipped commodities that potentially harbor contaminating organisms. Military vehicles are 24 also a significant pathway for introductions as they are moved between countries. Used vehicles 25 are viewed as higher risk due to factors that include storage and longer time for introduction of contaminating pests. New Zealand and Australia have implemented safeguarding programs for 26 27 vehicle importation that consider BMSB and other contaminating pests (Australian Department of 28 Agriculture, 2019). While incidence of a particular contaminating pest on imported vehicles may 29 be low, overall introduction can be high due to sheer number of vehicles imported (MAF, 2008; 30 Tov and Newfield, 2010).

31

32 Airplanes

33

34 Airplanes have long been recognized as a transport risk for contaminating pests. Over a 10-year 35 period from 1997–2007, more than 1900 live pest interceptions, including insects, weeds, 36 mollusks, and mites were recorded from aircraft holds in the United States (Meissner et al., 2009). 37 High profile pests of aircraft holds like Japanese beetle (Popillia japonica Newman) have 38 prompted the use of exclusion devices on planes at the point of origin so that cargo can be 39 successfully moved and accepted by western states (USDA, 2020b). Invasive plant pests were 40 transported across the globe on or in plane cargo during World War 2, including the brown tree 41 snakes, Boiga irregularis (Bechstein)) which were accidently introduced to Guam (Richmond et 42 al., 2015). Management of the brown tree snake in Guam is focused on limiting further dispersal 43 by aircraft (Engeman et al., 2018).

44

1 **2.2.2. Wood commodities**

2

A wide range of things that are considered "wood" are moved in international trade. These commodities may include, for example, unprocessed round wood, sawn wood, plywood, oriented strand board, or by-products from the manufacture of these, such as sawdust or wood chips. Wood moving in trade may also be the packaging used to contain or support a commodity, e.g., pallets, crates, or dunnage. Contaminating pests may be found in association with any of these wooden articles.

9

Round wood may be referred to as logs, poles, posts, timber, or pilings and is defined as "wood not sawn longitudinally, carrying its natural rounded surface, with or without bark" (ISPM 5). Round wood may be attractive to organisms that do not infest it. For example, the western conifer seed bug *Leptoglossus occidentalis* (Heidemann) may be found perching on logs or wood in the fall when looking for places to overwinter. Bark beetles may be attracted to round wood due to volatiles emitted by the wood (see section 2.3.1 Semiochemical attractants) but are not able to infest the wood. These organisms are often referred to as perching insects.

17

Sawn wood (lumber) is defined as "wood sawn longitudinally, with or without its natural rounded surface with or without bark" (ISPM 5). Sawn wood may include squared pieces of wood without bark or partially squared wood with one or more curved edges that may or may not include bark. In the commercial production and sale of sawn hardwood commodities, curved edges are commonly left for subsequent trimming (NAPPO, 2018).

23

With increased level of processing, wood becomes less attractive to organisms that are attracted by volatile compounds emitted by recently cut wood. Heat treated wood is less attractive to insects for example (Haack and Petrice, 2009). Some organisms may be attracted to stacks of lumber for refuge. Other insects, such as the BMSB *Halyomorpha halys,* (Stål; see section 2.2.2) are attracted to light patterns created by the spaces between boards.

29

Wood chips are wood fragments, with or without bark, produced mechanically from various harvested tree parts and processing residues or post-consumer wood material (EPPO, 2015). Some insects are attracted to the volatile compounds given off by freshly cut wood, and in rare instances may infest freshly processed wood chips. More frequently, insects attracted to freshly chipped wood will be present as contaminants. Many species of pathogenic decay fungi, canker fungi and nematodes may be present in wood chips with or without bark (RSPM 41, 2018), but most of these would have originated from infestation of the wood prior to chipping.

37

Wood packaging material (WPM) (including pallets, skids, pallet collars (collapsible sidewalls for a pallet base), containers, crating/crates, boxes, cases, bins, reels, drums, load boards, and dunnage) is constructed from solid or processed wood. When compliant with the ISPM 15 treatment, wood packaging is rendered essentially free of quarantine pests at the time of treatment. However, as with any other conveyance, contaminating organisms may become associated with any type of wood packaging material at any point while in service. The presence of contaminating organisms on ISPM 15 certified material does not necessarily indicate a failure of ISPM 15 treatment and should not automatically be reported as such. When an organism is detected on ISPM 15 certified wood packaging material, it could be a result of several factors including fraud, inadequate treatment, or contamination after treatment (Haack *et al.*, 2014). This should be taken into consideration when an importing NPPO is reporting a 'notification of noncompliance' to the exporting NPPO (ISPM 13, 2016). The most likely cause of a contaminating pest should be included in any notification given to the exporting NPPO.

7

8 Research has indicated that drying wood (whether through kiln treatment or equilibration to 9 ambient moisture condition over time) may change the types of pests attracted to it (Naves *et al.*, 10 2019). This may be relevant for contaminating organisms that are attracted to host chemical 11 volatiles in untreated wood with higher moisture content. The design structure of wood packaging 12 material lends itself to refuge opportunities for some contaminating organisms. The likelihood of 13 contamination may depend on the design of a particular type of wood packaging and the 14 subsequent attractive qualities (see section 2.3.2 Visual Cues for further explanation).

15

16 **2.3.** Why do organisms contaminate wood commodities?

17

18 Contaminating organisms are found in association with virtually all internationally traded wood 19 commodities, including forest products such as round and sawn wood, wood chips, wood 20 packaging material, plywood, etc. How and why they become associated with wood varies with 21 both the nature of the contaminating organisms and wood substrate. Some contaminating 22 organisms are passively deposited from the air or in water droplets (this applies to most fungi) or 23 are vectored by insects or other intermediary organisms (some fungi and nematodes), and finally 24 others actively arrive under their own locomotion (by flying, crawling, slithering (snakes), or by 25 adhesive locomotion (slugs)). In some cases, organisms are attracted to a substrate by sensory 26 stimulation through chemical, thermal, auditory or visual cues, and in other situations they arrive 27 by chance (Bell, 1990; Saint-Germain et al., 2007). Certain biological traits increase the likelihood 28 of invasion, primarily affinity to human activity (e.g., light and sound production) and human-29 related objects (e.g., surfaces for gypsy moth oviposition) (Leibhold, 1995). Other traits of 30 successful contaminating organisms include: ability to complete the life cycle in highly disturbed 31 habitats; a life stage that seeks sheltered areas; a life stage with dormancy that enables survival 32 during transit; and association with common contaminants of commodities such as soil (Toy and 33 Newfield, 2010).

34

Contamination on internationally traded wood commodities can occur at any point after pest mitigation measures, including: prior departure from the exporting country; in transit (following departure from the exporting country) via cross-contamination from other cargo or improperly cleaned ship's holds; or as a result of post-entry contamination in the importing country.

39

40 **2.3.1. Semiochemical attractants**

41

Insects can be attracted by volatile organic compounds that are naturally produced by the wood
 of living trees and wood products such as sawn wood, wood chips, etc. (Moeck, 1970; Wallin and

44 Raffa, 2002; Saint-Germain *et al.*, 2007) or by other insects (Borden, 1989; Allison *et al.*, 2004).

1 Wood-produced chemicals, generally alcohols or terpenes, are used by insects to detect suitable 2 hosts (Kirkendall et al., 2008; Miller and Rabaglia, 2009; Oliver and Mannion, 2001; Roling and 3 Kirby, 1975). Ethanol, a product of anaerobic metabolism, is released by weakened, stressed 4 trees, sawn wood and wood products (Gara et al., 1993; Kimmerer and Kozlowski, 1982; Steckel 5 et al., 2010; Pohleven et al., 2019). It is attractive to many species of bark and ambrosia beetles 6 (Graham, 1968; Hayes et al., 2007; Miller and Rabaglia, 2009; Montgomery and Wargo, 1983). 7 Some of these chemicals continue to be emitted long after the wood is cut and dried, although 8 they are considerably reduced through heat treatment at high temperatures (Kačík et al., 2012; 9 Pohleven *et al.*, 2019).

10

When colonizing a new breeding substrate, insects often release aggregation and sex pheromones. Many insects are attracted to combinations of host volatiles and pheromones produced by other insects, suggesting that a suite of attractants are used by these organisms to find host material. Although this is likely more pertinent to the attack of trees, insects that are associated with any wood commodity could release semiochemicals, attracting other insects to the wood.

17 19 **222**

18 **2.3.2. Visual cues**19

Insects employ a variety of sensors and inputs to orient themselves toward food, oviposition sites and mates. In some cases, visual and olfactory cues are used together to find an appropriate object or condition. Terrestrial gastropods have a range of visual quality and may use visual stimuli for locomotion toward food or away from predators (Chernorizov and Sokolov, 2010; Bobkova *et al.*, 2004).

25

26 Light (phototaxis)

27

28 Many insects are attracted to light. A well-known example of contaminating insect movement due 29 to light attraction (positive phototaxis), is found in the Asian gypsy moth spread to North America. 30 AGM are attracted to lights at ports where they deposit eggs on cargo and ships and upon arrival 31 at North American ports, the larvae disperse (Schaefer and Wallner, 1992; Wallner et al., 1995). 32 A number of Lymantriid moths are specifically attracted to light in the 480-520 (blue-green region) 33 and 340-380 nm range (Crook et al., 2014). Wallner et al. (1995) found that use of UV and blue 34 light blocking filters made lights less attractive to female moths in the Russian Far East. 35 36 Most adult insects whose larvae develop in freshwater possess positive polarotaxis, i.e., are 37 attracted to a source of horizontally polarized light which can include attraction to vertical glass 38 surfaces and other artificial surfaces (e.g., asphalt roads, black plastic sheets, dark colored cars, 39 dark glass surfaces, solar panels) that are reflecting highly and horizontally polarized light (Kriska 40 et al., 2008). Similar studies on tabanid flies have found that repellency and protection of livestock

41 is improved with spotted, striped or white coat as background, effectively depolarizing light

42 (Horváth *et al.*, 2017; Blaho *et al.*, 2013).

- 43
- 44

1 Shapes

2

3 Many bark beetles use a combination of cues to locate a host. For example, Dendroctonus 4 species use cues to locate trees, and are attracted to objects that are upright, cylindrical shapes. 5 similar to the silhouette and color of a host tree (Campbell and Borden, 2006). This information 6 led to the design of funnel traps which mimic the silhouette of an upright tree. Some insects, like 7 Triatoma infestans (Klug), exhibit a strong negative reaction to light and are attracted to black 8 patches, potentially for shelter with and without olfactory cues (Reisenman et al., 2000). Bees and 9 wasps are attracted to dark cavities for nesting. Attraction to different patterns associated with 10 shadows and cracks could also be associated with cardboard, metal, plastic or other materials. 11

12 **2.3.3. Sound**

13

14 Acoustic communication is generally widespread among vertebrate animals, but insects are the 15 lone invertebrate group where sound production and hearing are widespread (Hoy, 1998; Pollack, 16 2017). Sound is generally divided into "airborne sound" and "sensing of vibration in the substrate," 17 the former being less prevalent in insects due to short wavelength constraints. Sound production 18 when emitted is used to attract, repel or threaten. Sound is also used for detecting and locating 19 predators, hosts and mates (Pollack, 2017). Sound is used, with varying degrees of success, as 20 the basis for pest management programs focused on mating disruption and repellency. (Gammon, 21 2015; Mankin, 2012).

22

23 A variety of beetles use acoustic sounds or "chirping" produced by the friction of body surfaces to 24 communicate. They use these calls to signal aggression and mating readiness (Barr, 1969; 25 Rudinsky and Michael, 1973). Sound production can also be used for predator avoidance 26 (Spangler, 1988) or host detection in the case of parasitic insects such as the tachinid fly 27 (Lehmann and Heller, 1998). Arthropods and vertebrates generally produce sound for 28 communication in the range of 1-10kHz; abiotic noise is typically below this level (Luther and 29 Gentry, 2013). However, anthropogenic noise can be heard at a wide range of frequencies. 30 Depending on the species, it can lead to interference of communication, altered behaviors, 31 confusion, or attraction to auditory cues of human origin (Bunkley et al., 2017). Some organisms, 32 particularly those with fast reproduction and short life cycles, such as Oecanthus tree crickets, 33 adapt to noise pollution quickly with little interference to communication (Costello and Symes, 34 2014). The emergence of data on the effect of anthropogenic sound on insect communities has 35 important implications for the management of shipped commodities. Bunkley et al. (2017) 36 conducted studies on industrial natural gas fields with elevated noise levels due to compressors 37 and other increased background noise and confirmed distributional change in insect communities 38 as a result. Commercial activities around ports and other industrial locations, involving shipping 39 and storage could have similar effects on the nature and potential of contaminating organism 40 levels present. 41

- 42
- 42
- 43 44

1 2.3.4. Temperature

2

Thermal signals may be detected by insects in search of food sources and habitat. The western conifer seed bug, *Leptoglossus occidentalis*, has specialized organs that detect infrared radiation emitted by their main food source, conifer cones (Takács *et al.*, 2009). Multiple insect orders are attracted from great distances to infrared radiation emitted by fires. As the fires subside these insects attack the damaged trees that would otherwise be uninhabitable. *Melanophila acuminata* (DeGeer) has been reported to fly up to 80km to reach burning materials (Evans, 1964; Schmitz and Bleckmann, 1998).

10

Thermoreceptors on insects vary greatly by species. Some insects can detect minor temperature changes, such as conifer cones that are 15 °C warmer than conifer needles. Others can sense large spikes in temperature, such as fires ranging from 500 to over 1000 °C (Takács *et al.*, 2009; Schmitz and Bleckmann, 1998). This attraction to heat may pose a risk during wood processing and storage. For example, wood with residual heat following kiln treatment or wood exposed to sunlight may result in attractiveness to a range of contaminating organisms.

17

18 **2.3.5. Moisture**

19

20 Olfactory receptors are used by many organisms to locate sources of water vital for metabolic 21 function. Odorant receptors in vertebrates are comprised of two major classes of receptor genes. 22 The first class is believed to detect water soluble odorants primarily found in fish, amphibians, 23 and some mammals. The second class found in tetrapods, likely detects airborne odorants 24 (Freitag et al., 1998). Insects such as the blowfly, Phormia regina (Meigen), detect water with 25 chemoreceptors in their antennae and tarsi. The presence of hygroreceptors in insects also gives 26 some species the ability to detect moisture and humidity (Tichy and Kallina, 2013; Wigglesworth, 27 1972).

28

29 While organisms use various methods to locate water directly, others may use indirect methods 30 such as detecting volatile organic compounds (VOC's) that can be emitted from other biotic 31 components of the ecosystem that are associated with water. Fungi and microbes cause the 32 release of VOC's when they decompose wood, which can attract symbiotic insects that make use 33 of the altered substrate and food source. Predatory or parasitic insects may also be attracted to 34 these conditions (Mali et al., 2019; Kandasamy et al., 2016). Small, slow moving vertebrates such 35 as snails and slugs similarly use VOC's, released by plants, diatoms and algae, to locate a moist 36 habitat that contains sustenance (Brönmark and Hansson, 2012; Hanley et al., 2018).

37

38 2.4. Behavioral considerations

39

40 Contaminating organisms may choose a wood substrate based on its suitability to increase 41 survival. This can include features that increase predator avoidance and provide protection from 42 the elements, both short and long-term depending on each species seasonal movements. The 43 characteristics of the substrate and surrounding habitat may also be chosen for its abundance of 44 nest-building materials and possible nest locations. Organisms that rely on passive dispersal may 1 be more likely to reach certain substrates based on the movement of wind and water through the 2 natural landscape.

3

4 2.4.1. Refuge

5

Following arrival on a substrate, many insects assess the conditions for refuge (moisture content, light/dark, temperature), oviposition (bark presence), negative and positive geotaxis and determine suitability for refuge. Many organisms make use of camouflage within their environment to avoid predators. The Tulip-tree beauty moth, *Epimecis hortaria* (Fabricius), finds shelter on matching tree bark making it very difficult to locate. Other species make use of holes and crevices or hide under bark or in hollow logs. These shelters also provide protection from the elements such as extreme temperatures, precipitation, and wind.

13

14 **2.4.2. Rest**

15

16 In some cases, insects rest on objects when searching for or travelling to food, mates, or shelter. 17 Migratory behavior can result in sudden arrival of insects that are travelling toward wintering sites 18 or making the return trip. This can sometimes take place over multiple generations in which case 19 each generation stops and lays eggs before dying. The offspring then continue migrating and 20 repeat the process in a new location. Migration can take place over long distances or locally 21 depending on the species and location. Some species such as the red palm weevil, 22 Rhynchophorus ferrugineus (Olivier), fly short distances at a time before resting while others use 23 the wind to propel them great distances, as is the case with the cabbage webworm, Hellula undalis 24 (Fabricius) (Ávalos et al., 2014; Shirai and Yano, 1994).

25

26 **2.4.3. Nesting**

27

Wood which is stored undisturbed for a length of time may provide suitable nesting sites for a range of organisms including, but not limited to, solitary wasps, bees, spiders, moths and ants. Leaf-cutting bees (*Megachilidae* species) use crevices and pre-existing cavities in wood for nesting sites (Michener, 2000). The giant wasp *Vespa mandarinia* Smith also build nests in preexisting cavities in wood but are more often found in subterranean, concealed cavities (Matsuura and Sakagami, 1973).

34

Conveyances such as sea containers can also provide suitable nesting sites for a range of vertebrates and invertebrates (see section 2.2.1). The interior of sea containers, including under the floors, provide suitable refuge and nesting sites for stored product pests, wasps and more (Stanaway *et al.*, 2001).

39

40 **2.4.4. Wind, water dispersal**

41

42 Some organisms or materials, for example fungi, nematodes, seeds, or soil, that could be 43 considered contaminants do not actively sense, assess and choose substrates but are deposited 44 passively by means of wind, water, or vectoring organisms.

1 Fundal spores, for example are able to disperse considerable distances, and many are spread 2 via wind (Anemotaxis). Spores can also be dispersed by vectoring insects, animals, or rain. Rust 3 spores have been shown to travel as contaminating organisms on commodities or packaging as 4 in the case of Austropuccinia psidii G Winter in (Grgurinovic et al., 2006); but their survival and 5 risk of spread is extremely low (Lana et al., 2012). Spore longevity varies greatly among fungal 6 species and should be considered in assessing risk of fungal spores as contaminants (Sussman, 7 1982). Fungal spores are very common in the air and could be detected as contaminants on wood 8 products, especially with highly sensitive molecular detection methods. Their presence, however, 9 does not necessarily imply risk, and careful evaluation of the potential for transmission to new 10 hosts should be considered.

11

Some nematode species can survive for long periods of time, in some cases decades (Wharton, 1386), in a desiccated state (anhydrobiosis) and be wind-dispersed with fine soil particles (Fielding, 1951; Carroll and Viglierchio, 1981; Guar, 1988; Treonis and Wall, 2005; Nkem *et al.*, 2006). When they land on moist surfaces (including stacks of sawn wood), these nematodes can rehydrate and feed on fungi and bacteria. Foliar nematodes (e.g., *Aphelenchoides*) can be dispersed by water droplets to nearby surfaces (other vegetation or wood) (Kohl *et al.*, 2010).

18

Other passively dispersed organisms such as bacteria and pollen could be considered contaminants. Plant pathogenic bacteria, for example *Erwinia amylovora* (Burr.) Winsl. *et al.* and *Ralstonia solanacearum* (Smith) Yabuuchi, Kosako, Yano, Hotta & Nishiuchi have been reported as contaminants on fruit crates and wood (Ceroni *et al.*, 2004; di Bisceglie *et al.*, 2005).

23

24 **2.5. Biological considerations of risk**

25

An understanding of the biology of the organisms associated with a commodity, including which life stages could be transported and survive the duration of the voyage, existing climatic conditions en route, and post-shipment host contact is essential to determine risk. These biological considerations of risk are factors considered in the pest risk assessment stage of a pest risk analysis (PRA) (ISPM 2, 11 and 21).

31

32 **2.5.1. Life stage**

33

34 Different life stages of contaminating organisms have different inherent risks depending on factors 35 such as the commodity, transport pathway on, and post-entry conditions. The life stage of a given 36 organism may create a greater or lesser risk. For example, life stages which can withstand 37 unfavorable conditions pose more risk than a life stage with specific needs. Khapra beetle larvae 38 exhibit hardiness, withstanding long periods of diapause under various conditions in cracks and 39 crevices of containers and conveyances (Ahmedani et al., 2007; NAPPO, 2019). Eggs of many 40 organisms are difficult to detect and have varying levels of hardiness which enable them to be 41 translocated successfully attached to the exterior of a human-made object (see AGM example, 42 section 2.3.2).

43 44

1 **2.5.2.** Physiological requirements

2

The physiological requirements of a given contaminating organism determine the level of risk and are taken into consideration when conducting a pest risk analysis. For example, an obligatory rest period (e.g., diapause) or an alternate host may be required for an organism to complete its lifecycle. In such cases, the inherent risk associated with that organism may be very low if the required conditions are not met during transport or upon arrival. These risk factors would be assessed in a pest risk analysis.

9

Diapause is a state of dormancy often entered by organisms to survive extreme environmental conditions. In some cases, diapause is triggered by environmental conditions (facultative) and in others it is obligatory depending on life stage (Kostál, 2006). If diapause requirements are not met for a particular life stage on the pathway, then the risk is negated (e.g., temperature requirements in degree days for egg hatch).

15

16 The germination of spores of some fungi, notably rusts, is stimulated or suppressed by host-17 derived volatile compounds (French, 1992). When such compounds are absent, as would likely 18 be the case for passively deposited fungal spores, germination would not occur or would be very 19 low. For example, urediniospores of *Puccinia (Austropuccinia) psidii* did not germinate in distilled 20 water but showed 88% germination when exposed to the host volatile compound Hentriacontane 21 (Tessman and Dianese, 2002).

22

23 **2.5.3. Reproductive considerations**

24

25 Reproductive status or reproductive strategies of contaminating organisms factor into assessing 26 risk. For example, a single gravid (mated) female carries more potential for successful invasion 27 than an unmated female or single male insect, mollusk, or vertebrate organism. The potential for 28 a large egg batch size further increases the associated pest risk of a mated female. Reproductive 29 strategy (for example, parthenogenetic (asexual) organisms such as the hemlock woolly adelgid, 30 Adelges tsugae (Annand) (Havill et al., 2006) versus sexual organisms) is also an important 31 consideration. Likewise, organisms with haplo-diploid strategies where sib-mating and oedipal-32 mating occur do not require a sexual mate, and thus have an advantage in a new environment. 33 (Kirkendall et al., 2015).

34

35 **2.5.4. Establishment potential**

36

The probability of establishment can be estimated using information about a given contaminating organism such as its life cycle, availability of suitable hosts, suitable environment, reproductive strategies, natural dispersal mechanisms, and other factors affecting its survival in areas where it naturally occurs. These can be considered in a pest risk analysis conducted by the importing country. Training material on pest risk analysis, including establishment potential, is provided by the IPPC and is based on IPPC standards ISPM 2, ISPM 11 and ISPM 21 (FAO, 2020b).

13. PHYTOSANITARY MEASURESTOREDUCETHEINCIDENCEOF2CONTAMINATING ORGANISMS

3

Specific measures were discussed in previous sections on a case-by-case basis. Listed below are examples of existing programs and associated best practices which have been implemented to reduce the risk of specific contaminating pests. The individual measures identified below are not intended to provide a comprehensive list of approaches to mitigate contamination. Furthermore, the absence of a measure in this list is not a reflection of that measure's effectiveness in mitigating contamination.

10

3.1 Measures applied immediately prior to shipping

12

13 Treatment immediately prior to shipping is meant to mitigate specific contaminating pests, i.e., 14 regulated quarantine pests. While this practice decreases the risk of contamination, its 15 applicability and effectiveness may be limited by the nature of the commodity, timing of 16 contamination, the best management practices utilized post treatment (e.g., physical barriers), 17 and the types of treatment available. The risk-reduction options outlined below may be used to 18 mitigate the presence of non-regulated contaminating organisms as well.

19

20 Treatments for wood commodities can generally be separated into two major categories, chemical 21 or non-chemical. Fumigants dominate the chemical category, with methyl bromide most 22 commonly used in both containers and under tarpaulin. Many countries are moving away from 23 methyl bromide due to environmental concerns (Velders et al., 2007). In addition, aerosols, dips, 24 dusts, and sprays are featured as chemical treatment options in certain instances. Among non-25 chemical treatments, heat treatment in various forms is the most commonly utilized. Cold 26 treatment and irradiation are also classified as non-chemical treatments, with use mostly 27 restricted to perishables. Treatments for conveyances could include fumigation, pesticide 28 application, inspection, and cleaning.

29

30 Heat treatment

31

Heat treatments (including conventional dry heat treatment, forced hot air, steam, vapor heat and hot water immersion) are effective for a wide variety of contaminating organisms. Schedules will vary depending on the contaminating pest, the nature of the commodity, and other circumstances. Dielectric heat, which includes microwave and radio frequency, is recognized as a treatment alternative in ISPM 15 for solid wood packaging material (ISPM 15, 2019). Products sensitive to heat, such as living plants or Christmas trees, will not be able to undergo heat treatment (NAPPO, 2014).

- 40 Fumigation
- 41

42 Fumigation is widely available and is generally easy to apply to consignments of commodities and

- 43 containers, but efficacy may be a concern depending on the type of forest product commodity and
- 44 proper application among other factors. Furthermore, fumigation may not be applicable because

of chemical absorption, toxicity or environmental and health concerns. Processes to recapture
 methyl bromide to fumigate forest commodities have also been successfully developed. Sulfuryl
 fluoride and phosphine are also listed as alternative fumigants for certain commodity categories.

4 Proper application of fumigation requires a licensed professional who is certified.

6 Physical removal of pests

7

5

8 In some cases, commodities can be cleaned of contaminating pests prior to shipping. For 9 example, as recommended in RSPM 37, *Integrated measures for the trade of Christmas trees*, 10 trees

11

12 "may be mechanically shaken using a motor or tractor driven shaking unit. This method is 13 considered to be effective in reducing the incidence of some pests on trees. Each unbound 14 tree should be shaken with sufficient intensity and duration to dislodge insects and other 15 contaminants, and until most of the dead needle fall is eliminated" (RSPM 37, 2012).

16

17 This procedure has been shown to be effective in the removal of yellow jackets (*Vespula* spp.) 18 (Hollingsworth *et al.*, 2009) and has been implemented in import regulations for Christmas trees 19 to Hawaii and other countries. Signs of contaminating pests may also be identified through 20 inspection and removed (e.g., ant or wasp nests).

21

In sawn wood production, processing steps such as debarking, squaring of round wood, and
 plaining of sawn wood can physically remove infesting and contaminating pests which may be
 present (RSPM 41, 2018).

26 Timing

27

25

Most measures that are applied have no lasting effect against contaminating organisms, unless they are chemical treatments (e.g., preservatives, anti-sap stain, fungicides, and insecticides) that remain in the treated material or on the surface at sufficient concentrations to provide residual protection. However, some organisms may contaminate commodities regardless of any residual level of chemical remaining on or in the material.

33

Because of the temporary effectiveness of these measures, there is no guarantee that treated materials are free of contaminating organisms. The likelihood of contamination will increase with time after treatment, and storage conditions should also be taken into consideration when assessing the likelihood of contamination. A system of approaches commensurate with the determined likelihood of contamination should be implemented to prevent transportation of these organisms.

40

41 Inspection

42

Inspection may occur as a measure applied immediately prior to shipping. Even with its limitations,
 inspection may be the most appropriate measure. A sampling intensity level can be developed

from information found in the AQIM Manual (USDA, 2011b), or equivalent guidance from other
 countries, or ISPM 31 (2016), which contains detail on inspection in section 3.9.

3

4 **3.2 Pesticide application**

5

6 The international trade in WPM mandates use of approved fumigants (methyl bromide, sulfuryl 7 fluoride) along with heat or dielectric treatment as described in ISPM 15 but does not recommend 8 topically applied pesticides. However, the use of topically applied pesticides in liquid form is used 9 extensively on logs and processed wood by a number of countries, primarily for domestic 10 protection at commercial wood processing facilities, as is the use of aerosols for the protection of 11 containers and conveyances. Large-wood treatment companies have formed specific divisions to 12 address pest deterrence and improved wood preservation.

13

14 The application of pesticides can provide an added layer of protection against contamination. 15 Pesticides are typically applied to wood with treatments such as spraying, rolling, dipping or 16 vacuum/pressure impregnation. A variety of formulations exist that can be used for pesticide 17 application (Lebow, 2010). Pesticides that are applied to commodities such as wood are generally 18 applied during processing and prior to shipment. Conveyance or container applications are 19 generally applied pre-shipping (MAF, 2009). Most onboard pesticide applications are related to 20 ship management and restricted to rodents, cockroaches, and stored product pests (United States 21 Navy, 2008).

22

Toxicity of chemicals used as treatments can be a concern for human health. There may also be safety concerns with handling due to surface residues. Also, importing and exporting countries need to agree upon what substances are permitted and at what concentrations. Pesticide schedules can be customized to meet the required duration of protection in accordance with the label specifications.

28

29 **3.3 Shipping season**

30

31 Contaminating pests associated with wood commodities may show seasonal development and 32 be dormant or in immature life stages at certain times of the year. Also, some pests are only 33 associated with commodities or conveyances at certain times of the year, for example at the time 34 of feeding, oviposition, or overwintering site selection. During these times, the cold or dry season 35 for example, it may be possible to export wood commodities with little risk of transporting life 36 stages capable of establishing in a new environment. However, when commodities are shipped 37 from cold to warm climates, pests may become activated if dormancy requirements have been 38 met (e.g., diapause in some insects). For example, Asian gypsy moth eggs laid on the side of 39 shipping containers or other substrates or conveyances may complete development requirements 40 en route and be ready to hatch and disperse upon arrival (models for shipping route development 41 of AGM illustrate this example, Gray, 2016). Vessels visiting AGM infested areas are regulated 42 during periods of the year when female flight occurs (RSPM 33, 2017). An example from the USA 43 is exportation of heat-treated lumber outside the flight season (October-April) of sawyer beetles, 44 Monochamus spp. This ensures that neither pinewood nematode, Bursaphelenchus xylophilus (Steiner and Buhrer) Nickle nor its vector, *Monochamus* spp. are transported (Bragard *et al.*,
 2018). Careful consideration of pest life cycles, shipping windows and transit across seasonal
 temperature zones should be made in assessing pest risk and developing import regulations.

4

3.4 Areas of pest freedom or low pest prevalence and pest free areas of production

5 6

7 Pest free areas (PFAs) are a valuable mitigation strategy because once they are identified, 8 certified, and fully implemented, they do not require further action from a shipper to ensure 9 freedom from contaminating pests in cargo (FAO, 2019). Pest free areas are defined as "an area 10 in which a specific pest is absent as demonstrated by scientific evidence and in which, where 11 appropriate, this condition is being officially maintained" (ISPM 5, 2021). An area of low pest 12 prevalence (ALPP) is defined as "an area, whether all of a country, part of a country, or all or parts 13 of several countries, as identified by the competent authorities, in which a specific pest is present 14 at low levels and which is subject to effective surveillance or control measures" (ISPM 5, 2021).

15

Pest free areas can be difficult to establish, certify and maintain and assessment is specific to each pest. PFAs do not preclude the transport of non-quarantine pests or organisms that have not been identified. They require a thorough and effective certification process to ensure that the area is free from pests or poses an acceptable reduced risk. This certification process also needs to be clearly developed, communicated, and agreed upon by the importing and exporting NPPOs (ISPM 4, 2017).

22

23 **3.5 Storage**

24

25 When schedules do not permit shipment of commodity immediately following processing, storage 26 options may be considered. Commodities may be stored in a variety of places and conditions 27 using best management practices, depending on the risks associated with contaminating 28 organisms that may be present Producers, processors, and shippers should be aware of 29 contaminating organism concerns in markets they are shipping to and should develop mitigation 30 procedures accordingly. Storage options may vary depending on the type of commodity, 31 environmental conditions (temperature, relative humidity), time of year and potential associated 32 contaminating pest risks.

33

Proper storage of products includes the implementation of best practices that have proven to be effective over time in reducing the likelihood of (or eliminating altogether) contaminating organisms. The effectiveness and application of these practices can be dependent on the type of pest in question as well as ambient environmental conditions. Importing and exporting countries should share information on what are the most effective practices and how to implement them. Ideally, shippers, freight forwarders, and shipping equipment manufacturers should all be involved in developing effective practices that do not create barriers to trade.

41

42 Best management practices should be used to minimize the risk of wood commodities becoming

43 contaminated. Examples of these practices are related to storage as well as handling. They

44 include but are not limited to:

- 1
- 2 Storage:
- 3 Store indoor when at all possible;
- 4 When stored outdoors, cover with shade or anti-pest organism net;
- 5 Store as far away from live trees and shrubs as possible;
- 6 Do not store under bright lights, particularly at night;
- 7 Store off the ground, ideally on a dry riser and/or a solid surface;
- 8 Do not store in weedy or grassy open yard areas;
- 9 Avoid contact with water and other fluids.

10 Handling:

- 11 Inspect wood commodities for contamination before use;
- 12 Sweep or spray wood commodities with compressed air to remove any contaminants;
- Rotate inventory as much as possible (first in, first out approach) to prevent wood from sitting
 in one place for too long.

15 Protecting:

- 16 Store logs under water or spraying water (hardwood and softwood) as a protection;
- 17 Use anti-aggregation pheromones to deter secondary insect contamination (Hughes et al.,
- 18 2017; Borden *et al.*, 2001).
- 19 Other:
- Maintain clean floors, containment, wrapping, and yards (e.g., sanitation may include bark
 removal in log yard);
- 22 Decrease storage periods;
- 23 Conduct surveillance on three party import operations;
- 24 Conduct surveillance on courier shipments.

26 **3.6 Systems Approaches**

20

25

28 Systems approaches may provide an option for mitigating the occurrence of contaminating pests 29 on forest products. A systems approach is defined as "a pest risk management option that 30 integrates different measures, at least two of which act independently, with cumulative effect" 31 (ISPM 5, 2021). Systems approaches for forest products as outlined in RSPM 41 (2018) include 32 mitigation options employed at different critical control points along the production pathway to the 33 final import destination where post-shipping treatments may be applied. Mitigation options may 34 be implemented during production, storage, shipping and post shipping, for example. At each 35 point an option is employed to reduce the risk of a given pest. Systems approaches may be 36 designed for contaminating organisms or pests in the same way they are used for infesting pests 37 - using biological information about a given pest and applying sound scientific approaches to pest 38 mitigation. An example of a systems approach used for a contaminating pest is the Canadian 39 Sawn wood Certification Program which combines inspection, segregation of organism-free 40 wood, specified storage conditions, oversight, traceability and a manual specifying the 41 components of the system -- including inspection procedures for brown marmorated stink bug 42 (CFIA, 2019). New Zealand has implemented a systems approach to mitigate contaminating 43 organisms moving with sea containers in the Pacific Island region which combines cleaning,

1 storage on hard surfaces, pest control, reducing pest habitat in port areas, auditing, and 2 certification (MAF, 2009; Ashcroft *et al.*, 2008).

3

3.7 Post-shipping risk-reduction

4 5

6 Contaminating organisms may become associated with a commodity or conveyance at a number 7 of points along its export-import pathway, from the site of production to the final destination. Post-8 shipping treatments provide an opportunity to address contaminating pests before they leave the 9 commodity or conveyance they are contaminating and potentially establish in a new environment. 10 Post-shipping mitigation may include any post-production measures applied before shipping 11 (listed in Section 3), such as physical removal of organisms, pesticide treatment, fumigation, heat 12 treatment, etc. Storage, restricted use, and/or limited distribution at destination are alternative 13 options used to address contaminating organisms associated with a product (for example, wood 14 chips to be used for pulp or biofuel). Processing post-shipping in conjunction with careful storage 15 requirements may be deemed a risk-reduction option.

16

17 **3.7.1 RSPM 33 Pre-entry inspection for Asian gypsy moth**

18

19 RSPM 33 (2017) provides guidelines for risk management practices to minimize the entry and 20 establishment of the Asian gypsy moth (AGM) which are specifically related to inspection 21 procedures and subsequent certification of vessels prior to reaching a port of entry. These 22 practices can be applied to other contaminating organisms as well. They include inspection and 23 certification of the vessel by an NPPO official prior to departure and ongoing intensive inspections 24 by vessel crew while en route to the destination. If any signs of AGM or other pests are discovered, 25 they are removed and disposed of or destroyed. The Manual for Agricultural Clearance (USDA, 26 2012) also provides special procedural guidance and a protocol for suspect Asian gypsy moth on 27 ships. 28

This approach poses nominal disruption to trade for compliant vessels while reducing risk of contamination. It does require enhanced communication between importing and exporting NPPOs to agree upon inspection and certification approaches, as well as training of NPPO officials and vessel crew.

33

34 **3.8. Inspection**

35

36 Inspection is commonly used by both exporting and importing countries to certify pest 37 presence/absence or phytosanitary status of wood commodities and transport vessels. Inspection 38 is defined as the "official visual examination of plants, plant products or other regulated articles to 39 determine if pests are present or to determine compliance with phytosanitary regulations" (ISPM 40 5, 2021). ISPM 23 (Guidelines for Inspection) and ISPM 31 (Methodologies for Sampling of 41 Consignments) support the use of inspection as a phytosanitary measure. Each country can 42 stipulate its own inspection rules and the comprehensiveness of its policies. Varying levels of 43 inspection frequency and scrutiny can be a challenge for importing and exporting NPPOs reaching 44 agreement on acceptable protocols. Moreover, inspection requires appropriate infrastructure at 1 ports of entry. The importing country must also determine how to handle contaminated shipments

2 and must develop appropriate courses of action, e.g., fines or penalties, for non-compliant cargo

- 3 found during inspection.
- 4

5 There are specific drawbacks to inspection. Inspection requires well-trained personnel to be 6 effective. In addition, because inspection is time and resource intensive only a small percentage 7 of imported goods are typically inspected. Challenges are magnified by the cryptic nature of 8 contaminating organisms. Contaminating organisms can found in tight crevices and be well-9 camouflaged.

10

Inspection success can be improved through the identification of higher-risk pathways and/or lower risk shippers. By using a risk-based sampling approach (See Section 3.8.1 below) to identify high risk pathways inspectors can focus efforts on the most likely sources of contaminating organisms. Voluntary programs, such as Customs Trade Partnership Against Terrorism (CTPAT) in the United States, help to identify shippers who are willing to adhere to strict guidelines to ensure minimal phytosanitary risk, so that resources can be devoted to higher risk pathways (US Customs and Border Protection, 2021).

18

Inspection of commodities and conveyances may take place at any point along the commodity pathway. Mandated cleanliness of the commodity after phytosanitary measures have been applied is typically determined in consultation with the producer and the exporting NPPO. Inspection details and record keeping are part of a production manual approved and certified by the NPPO of the exporting country.

24

25 In Mexico, the verification of imported forest products and by-products is overseen by the official 26 personnel of the Federal Attorney for Environmental Protection (Procuraduría Federal de 27 Proteccion al Ambiente-PROFEPA), and then carried out in the facilities of ports, airports, and 28 national borders. The official procedures for the phytosanitary inspection and for the decision 29 making that are mandatory in this regard are established in the Manual of Procedures for the 30 Import and Export of Wildlife, Forest Products and By-Products, and Hazardous Materials and 31 Residues, subject to Regulation by the Ministry of Environment and Natural Resources (Manual 32 de Procedimientos para la Importación y Exportación de Vida Silvestre, Productos y 33 Subproductos Forestales, y Materiales y Residuos Peligrosos, Sujetos a Regulación por parte de 34 la Secretaría de Medio Ambiente y Recursos Naturales) which has been published in the Official 35 Gazette of the Federation since 2004.

36

37 3.8.1 Risk-based sampling

38

Inspection for the detection of pests is a sampling process based on the statistical conceptsassociated with the probability of detection. Risk-based sampling (RBS) is defined as:

41

42 "sampling that takes account of the probability of detection to determine the sample size
43 for an inspection. The number of items to be inspected will vary depending on the level of
44 infestation to be detected, the size of the consignment, and the pest risk. In RBS, sampling

frequencies are based on the relationship between actionable pest detections and specific inspection variables (e.g., type of commodity, origin, consignee, etc.)" (NAPPO, 2017).

2 3

1

By designing inspection processes around basic statistical concepts, inspection programs better
 identify and rank non-compliant imports. This has been used by countries for identifying high risk
 commodities associated with contaminating pests.

7

8 The United States of America use an improved risk sampling approach that requires the use of a 9 tiered sampling process to estimate the amount and kind of quarantine pests approaching a 10 location via various known pathways of pest entry (USDA, 2011b). In the past, selective criteria 11 (targeting) were employed to choose inspectional units that were considered to have a higher 12 likelihood of harboring pests. Under the current AQIM, sampling for information is randomized to 13 create a better representation of an entire population and allow for statistical analysis of data. 14 Based on gathered information and statistical analysis, sampling for detection can be 15 accomplished to ensure that certain members of the population have a higher probability of being 16 sampled if necessary. Sampling schemes are often designed specifically for each inspection 17 location to reflect unique characteristics of that location and its personnel. Recommended 18 hypergeometric tables (sample size calculator) for random sampling in commodity inspection 19 across major pathways are included in the AQIM manual, with noted reference to hitchhiker pests 20 as part of the inspection procedure. Canada uses both a target-based approach for a commodity 21 or pest and a randomized sampling approach for determining sampling lots, and inspection units. 22

23 The size of a sample for inspection purposes usually depends on a risk-based sampling objective. 24 The sampling objective is influenced by the risk associated with a specified regulated pest of a 25 specific commodity from a particular origin (*i.e.*, country, grower, exporter) (Plant Health Import 26 Inspection Manual, USDA 2012). The NAPPO Risk-Based Sampling Manual - Part I, outlines 27 how to design, evaluate, and manage risk-based sampling (NAPPO, 2021). Europe, Australia, 28 and many other importing countries all have individualized risk-based sampling programs that 29 combine elements of random and targeted sampling. Operational costs and other considerations 30 often dictate that targeted-based inspection sampling be the favored approach.

31

32 **3.8.2 Manual**

33

34 When a manual is required to address a specific contaminating pest, it may contain, as 35 appropriate, the following:

- best practices in consignment inspection and risk assessment;
- 37 record maintenance;
- development of phytosanitary management systems to align with requirements of importing
 countries.
- 40
- 41 For example, the AQIM Handbook provides a decision-making process from which a manual can
- 42 be created. The handbook includes decision tables, where 'hitchhiking' (contaminating) pests are
- 43 used as a recognized category. Inspection information is then entered into the Agricultural
- 44 Quarantine Activity System (AQAS) database.

1 **3.8.3 Training**

2

3 Training and competency of inspectors and other personnel are an important aspect of verifying 4 that pathways and products are free from contaminating pests. An accredited body or institution 5 should provide training for quality and consistency. Training should address the facility and 6 exporting country's NPPO (accreditation body) requirements.

7

8 **3.8.4 Audit**

9

In some instances, phytosanitary requirements are formally agreed between trading partners. Audits and oversight of the inspection, certification, and phytosanitary management aspects of these agreements, plus authorized certification are critical to ensure integrity and maintain transparency. Audits of authorized facilities are important for identifying non-conformances, corrective actions, and the need for follow-up audits. Corrective actions may be monitored by the NPPO. The NPPO of the importing country may request the NPPO of the exporting country to provide reports on audits undertaken.

17

18 **3.9 Traceability**

19

20 Traceability as a phytosanitary management tool was introduced in 2013 as an element of the 21 draft specification for a proposed IPPC standard for the international movement of grain. Concern 22 that "traceability" required further discussion and understanding beyond the scope of the grain 23 standard prompted its removal from the standard at that time (IPPC, 2014). In subsequent review 24 of existing standards and ISPM's, traceability generally described concepts of origin, trace-25 forward, and trace-back. The 2013 Grain Strategic Experts Meeting Report (IPPC, 2013 cited in 26 IPPC 2014) describes traceability as "a program management tool and documentation 27 responsibility (of the NPPO) that facilitates distinguishing lots of commodities in trade based on 28 the type of product, pest risks, and specific procedures that are applied to meet particular 29 phytosanitary objectives (e.g., pest free area)". More recently, traceability was defined in RSPM 30 41 as "the documentation and verification of the movement of the commodity from the initial 31 control point to the final product" (RSPM 41, 2018). This is accomplished through universal 32 recognition and use of phytosanitary certificates or third-party certificates (under NPPO oversight) 33 as an instrument that guarantees regulated articles meet specified phytosanitary import 34 requirements.

35

36 The vast majority of successful trace-back and trace-forward programs have been restricted to 37 positive pest/host relationship, *i.e.*, infested wood material. Contaminating organisms are not host 38 specific and can contaminate a commodity in many places along the commodity pathway, thus 39 traceability can be more difficult to achieve when required. For this reason, successful trace-back 40 and trace-forward programs should be designed with flexibility that considers cost, difficulty of 41 identifying a product to origin, transportation and distribution logistics, and other factors. It may 42 be advantageous to broaden focus from commodities to include conveyance and pathway, as 43 focus on the commodity alone may not be beneficial in some cases. Successful trace-back 44 programs for Asian gypsy moth on ships, snails on military ordinance containers, and brown

1 marmorated stink bug on vehicles are but a few examples. Bilateral agreement between industry 2 and regulatory authorities is essential in developing and maximizing the potential of traceability

- 3 programs.
- 4

5 4. CONCLUSIONS

6

7 A wide range of organisms move with commodities and conveyances in international trade. These 8 organisms can be categorized in two ways: by the damage they cause (quarantine or non-9 quarantine pests), and the nature of their association with commodities or conveyances (infesting 10 or contaminating organisms). Historically, most of the regulatory focus has been on infesting 11 organisms, and phytosanitary measures have been developed to prevent their movement. 12 Contaminating organisms can be more difficult to predict, and where they are deemed to be 13 guarantine pests, different approaches may be needed to prevent their movement. Many kinds of 14 organisms can be considered as contaminating and their respective mitigation strategies vary 15 greatly. Some, through the PRA process, may be determined to be non-problematic and are not 16 regulated as guarantine pests. Others might be determined to be regulated guarantine pests, and 17 mitigation options should be developed. This paper provides scientific information related to how 18 and why contaminating organisms become associated with commodities and conveyances and 19 provides information that can be used to develop science-based tools to identify and mitigate the 20 risk of their movement with wood products. 21

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