Wood packaging material

The EU requires all Wood Packaging Material (WPM) from third countries entering the EU to be ISPM 15 compliant. Post-Brexit the UK will become a third country and ISPM 15 will apply to WPM used for imports from the UK and all WPM exported to the UK. In the event of a ‘No Deal’ Brexit, the UK will become a third country and the requirement will be to use ISPM 15 for the movement of goods to and from the UK.

ISPM 15 is an internationally recognised phytosanitary measure for the treatment and marking of WPM which is mainly pallets, crates, boxes, cable drums, dunnage etc. and affects all WPM used in international trade.

The implementation of the scheme is overseen by the Department of Agriculture, Food and the Marine (DAFM). NSAI operates the ISPM 15 certification scheme on behalf of DAFM. NSAI carry out the registration and auditing of kiln facilities, registration of pallet and other WPM manufacturers, following which the WPM is marked as being ISPM compliant.

About NSAI

NSAI is an EU notified body for certification of medical devices, motor vehicles, construction products and measuring instruments. It also carries out market surveillance on packaged goods and measuring devices. NSAI aims to inspire consumer confidence and create the infrastructure for products and services to be recognised and relied on.

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Further information

The Department of Agriculture, Food and the Marine is responsible for the implementation of ISPM 15. Further information is available on their website.
What are the implications for the Irish food industry?

The Agri-Food business is at the core of the Irish economy. The industry has a reputation for the production of safe, high quality and sustainable food products. These unique characteristics have helped to build an export market worth circa €12.1 billion (Bord Bia 2019). The UK accounts for nearly 37% of these exports. Up to now, this trade has been facilitated by the EU Single Market which has no tariffs and frontier controls.

Brexit will have an impact on goods exported from Ireland to the UK and imported goods from the UK to Ireland. This will impact on the supply chain and logistical arrangements between Ireland and the UK. The use of the UK landbridge by food suppliers for the export and import of products from mainland Europe as was the practice, will no longer be a seamless process. It is anticipated that there will be delays at ports. This may have an impact on perishable goods. These delays will also impact products coming into Ireland on a ‘just in time’ basis for processing. Delays may also occur when dealing with import tariffs and potential product inspection/testing at the point of entry.

Further information
Management System Certification
All food businesses are required to comply with the EU Food Hygiene Regulations and a suitable method of demonstrating compliance is certification to ISO 22000 Food Safety Management System.

Further information is available on the NSAI website.

What are the implications for food packaging?

There are EU regulations and directives to address all aspects of the food supply chain including food safety, processing, transportation, retail, food service, traceability and information to consumers (e.g. labelling).

Product implications
Companies importing products from the UK may find that there is a divergence in the requirements outlined under current EU regulations and revised UK legislative requirements e.g. chilled food temperature requirements between Ireland and Northern Ireland.

Packaging and raw material implications
The EU Regulation on Food Contact Materials (FCM) (EC No 1935/2004) is applicable to all food contact materials that are widely used in everyday life in the form of food packaging, kitchen utensils, tableware etc. All users of food packaging i.e. food processors, retailers, online sales, are required to use packaging and materials that are certified as FCM in accordance with the Regulation. NSAI carry out the official control inspection of FCM suppliers in Ireland on behalf of the Food Safety Authority of Ireland (FSAI).

Post-Brexit, FCM sourced from or via the UK will have to be compliant with the EU Regulation EC No 1935/2004. The onus is on the Irish food business operator to ensure that the FCM is compliant. Further information is available on the FSAI website.

Further information
There are a number of agencies and organisations focussed on the food sector.
- Bord Bia
- Food Safety Authority of Ireland (FSAI)
- Food Drink Ireland IBEC
NSAI provide certification services for the suppliers of FCM. Further information is available on the NSAI website.

What are the implications for those who import and export from the UK?

Where the activities of the food business include import or export of live animals, animal products, plants or certain plant products to or from the UK, new regulatory requirements and customs procedures along the supply chain will be in place when the UK leaves the EU. As a first step, the business will need to register with the Department of Agriculture, Food and the Marine (DAFM) as soon as possible.

Where the business involves importing animals or products of animal origin, you must be registered on TRACES (an EU IT system). You should familiarise yourself with the specific requirements for the commodity you are trading in, by visiting the relevant page of the DAFM website.