

Agricultural Security Policy

RESPONSIBILITIES

It is the responsibility of the CTPAT Point of Contact (POC) at the **Vendor(s) and Manufacturer(s)** relevant department leadership and management to ensure that the procedures and this policy are followed.

DEFINITIONS

Conveyance

The powered transport vehicle or unit of a transportation mode, such as an airplane, semi-truck combination, train, or vessel.

Instruments of International Traffic (IIT)

IIT includes containers, flatbeds, unit load devices (ULDs), lift vans, cargo vans, shipping tanks, bins, skids, pallets, caul boards, cores for textile fabrics, or other specialized containers arriving (loaded or empty), in use or to be used in the shipment of merchandise in international trade.

Pest Contamination

Pest contamination is defined as visible forms of animals, insects or other invertebrates (alive or dead, in any life-cycle stage, including egg casings or rafts), or any organic material of animal origin (including blood, bones, hair, flesh, secretions, excretions); viable or non-viable plants or plant products (including fruit, seeds, leaves, twigs, roots, bark); or other organic material, including fungi; or soil, or water; where such products are not the manifested cargo within instruments of international traffic.

Wood Packaging Materials (WPM)

WPM is defined as wood or wood products (excluding paper products) used in supporting, protecting, or carrying a commodity. WPM includes items such as pallets, crates, boxes, reels, and dunnage. Frequently, these items are made of raw wood that may not have undergone sufficient processing or treatment to remove or kill pests, and therefore remain a pathway for the introduction and spread of pests. Dunnage in particular has been shown to present a high risk of introduction and spread of pests. The IPPC is a multilateral treaty overseen by the United Nation's Food and Agriculture Organization that aims to secure coordinated, effective action to prevent and to control the introduction and spread of pests and contaminants. ISPM 15 includes internationally accepted measures that may be applied to WPM to reduce significantly the risk of introduction and spread of most pests that may be associated with WPM. ISPM 15 affects all wood packaging material requiring that they be debarked and then heat treated or fumigated with methyl bromide and stamped or branded with the IPPC mark of compliance. This mark of compliance is colloquially known as the "wheat stamp". Products exempt from the ISPM 15 are made from alternative materials, like paper, metal, plastic or wood panel products (i.e. oriented strand board, hardboard, and plywood).

RELATED FORMS, POLICIES AND PROCEDURES

International Plant Protection Convention's (IPPC) International Standards for Phytosanitary Measures No. 15 (ISPM 15)

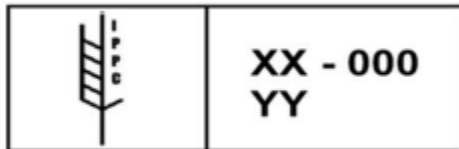
Anomaly Report – Pests/Contaminants

PROCEDURES

Wood Packaging Material

[ISPM 15 2018 En WoodPackaging Post-CPM13 Rev Annex1and2 Fixed 2019-02-01.pdf \(ippc.int\)](#)

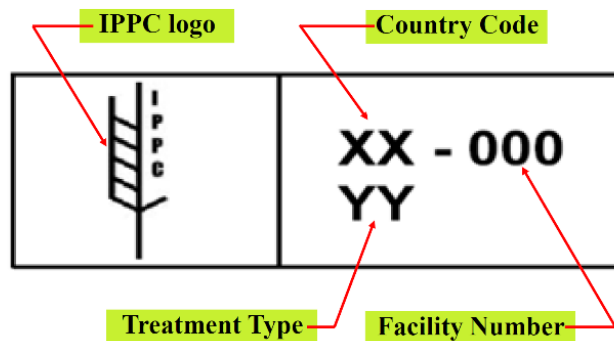
All Wood Packaging Materials (WPM) must be compliant with the International Plant Protection Convention's (IPPC) International Standards for Phytosanitary Measures No. 15 (ISPM 15) and possess the International Plant Protection Convention (IPPC) markings.



PEST PREVENTION MEASURES ABROAD

Visible pest prevention measures must be adhered to throughout the supply chains. All incoming WPM must be inspected for the IPPC markings.

International Plant Protection Convention (IPPC) Logo



Monitor the cargo staging area to ensure the cargo is not under lighting that might attract insects and increase the probability of infestation.

Utilize baits, traps, or barriers to prevent infestations from occurring in the cargo staging area. For example, salt barriers may be used to protect against snail infestations.

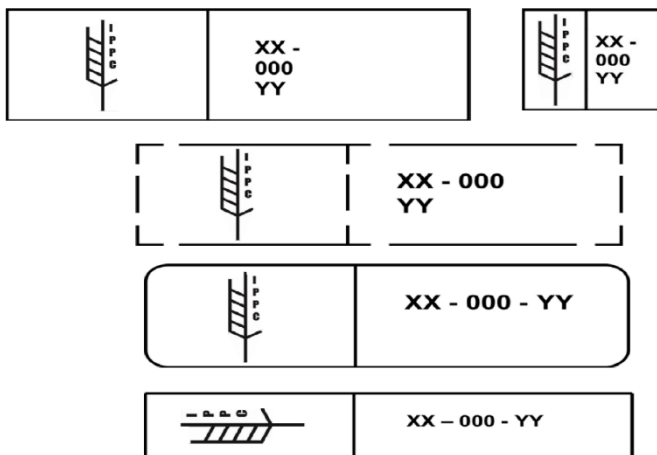
Store cargo away from vegetation.

Avoid placing IITs over grain, soil, or vegetation.

Store IITs away from natural areas and/or reduce vegetation around cargo and trailer storage areas.

Store WPM off the ground in a dry area of the facility.

Compliant Markings Variations



Correct IPPC Logo



Non-Compliant WPM



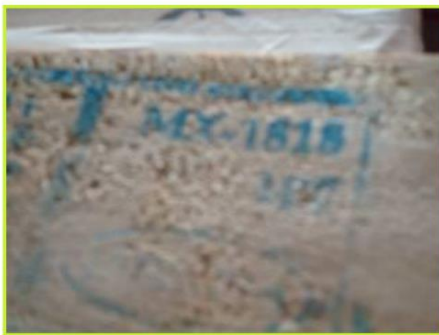
❖ Inappropriately marked WPM

Non-Compliant WPM



❖ Inappropriately marked WPM

Non-Compliant WPM



❖ Inappropriately marked WPM

DETECTION OF PESTS AND/OR CONTAMINANTS

If pests and/or contaminants are discovered inside a conveyance, IIT, pallet, and/or box:

- Notify your supervisor
- Take pictures of the pests and/or contaminants.
- the conveyance/IIT must be swept and/or vacuumed to remove such contamination.
- Document the incident on the Anomaly Report – Pests/Contaminants. Documentation must be retained for one year. The Hobby Lobby Stores, Inc. must be notified.

The policies, procedures, forms, and training material must be reviewed every year during the risk assessment process or as a result of an internal audit, security breach, etc. If any information in this policy is updated, the new policy must be disseminated to the appropriate personnel.