Vendor Instructions for W. R. Grace & Co.-Conn.

INTRODUCTION:

The following instructions are applicable to all vendors/suppliers exporting to W. R. Grace & Co.-Conn. (WRG). When designated the importer, WRG suppliers shall comply with all U.S. Customs and Border Protection (CBP) regulations pertaining to the importation of goods into the United States (US), as well as regulations on imports into other countries. WRG suppliers shall comply with all CBP regulations and U.S. Commerce, Bureau of Industry and Security (BIS), Export Administration Regulations (EAR), pertaining to exports from the US, export regulations in other countries and to comply with additional WRG requirements concerning invoicing, documentation, labeling, and security. WRG is committed to the exercise of "reasonable care" for all import operations and to continually monitor activity to ensure compliance with all regulatory requirements. All WRG vendors *are required* to adhere to these Vendor Instructions as follows:

- WRG contacts and WRG's Customs brokers must be notified by fax or eMail prior to any shipment to the US. (refer to Contact and Notification Information, section 1 below).
- All documentation provided to WRG and WRG's Customs broker(s) must be in ENGLISH (refer to Required Documentation, section 2 below).
- All documentation must be provided to WRG and WRG's Customs broker(s) prior to arrival of shipment(s) into the US (refer to Required Documentation, section 2 below).
- Specific procedures must be followed for shipments of samples (refer to samples in Tariff Classification and Customs Valuation, sections 3 and 4 below).
- Specific procedures must be followed for goods shipped under NAFTA or any other special trade program (refer to Special Trade Programs, section 6 below).
- Specific procedures must be followed for returns to the US (refer to U.S. Goods Returned, section 7 below).

1. CONTACT AND NOTIFICATION INFORMATION:

Before making a shipment to WRG, the following WRG contacts should be notified. Additionally, any questions regarding these Vendor Instructions should be directed to the following WRG personnel:

These instructions are to be used as a general guideline for Exporting/Importing. This information is provided to assist GRACE suppliers when Exporting/Importing to GRACE. These procedures cannot be interpreted as a substitute for compliance to applicable governmental regulations. If your company is designated as the Exporter/Importer of Record, it is your legal responsibility to understand and comply with Export/Import Regulations of the appropriate counties.

First Point of Contact:

Paul A. Donovan Import Department W.R. Grace & Co.-Conn 62 Whittemore Ave. Cambridge, MA 02140

Phone: 617-498-4509 Fax: 617-498-2641

eMail: Paul.A.Donovan@Grace.com

Alternate:

Andrew Gray
Trade Compliance Manager
W.R. Grace & Co.-Conn
7500 Grace Drive
Columbia, MD 21044

Phone: 410-531-8325 Fax: 410-531-8888

eMail: Andrew.Gray@Grace.com

Alternate:

Louise Durand
Foreign Trade and Logistics Specialist
62 Whittemore Ave.
Cambridge, MA 02140

Phone: 617-498-4464 Fax: 617-498-2641

eMail: louise.durand@grace.com

WRG has selected certain Customs brokers to act on its behalf when importing goods into the US. As a result, the following Customs brokers must also be notified before making any shipment to WRG. No other Customs brokers may be utilized without express approval from the WRG contact personnel listed above.

DHL Worldwide Express, Inc.

Phone: 800-234-2778

FedEx Trade Network (Canada shipments only)

Phone: 800-249-2153

Kuehne & Nagel 1 Harbor Street, Suite 303 S. Boston, MA 02210 Attn.: Angelo Guarino

Phone: 617-261-8062 Fax: 617-330-5023

Grace Davison Only:

BDP International Inc. 811 Cromwell Park Drive - Suite 100 Glen Burnie, MD 21061

Attn: Anna Nemirovsky Phone: 410-762-5812 Fax: 410-590-0883

UPS (Canada Shipments only)

Phone: 734-840-0000

2. REQUIRED DOCUMENTATION:

Provided below is a list of documentation required to be included with any shipment to WRG, as well as the required data points to be incorporated into each specific document. Documents must be faxed to the WRG personnel and WRG Customs brokers listed above in section 1 in advance of any shipment to WRG.

Bill of Lading or Air Waybill

Commercial Invoice in English and containing the required elements listed below:

Seller's name and address

Buyer's name and address

Consignee name and address (if different)

Purchase order number

Grace product name and SAP product code

Comprehensive description of product

Quantity per line item

Unit price and extended price on each line

If a no-charge sample or prototype, refer to the discussion on samples in the Valuation

Total value of shipment (refer to the Customs Valuation, section 4 below)

Country of Origin (refer to Country of Origin/Marking, section 5 below)

Harmonized Tariff Number (HTSUS number to the 10th digit) (refer to Tariff

Classification, section 3 below)

Terms of Sale (INCOTERMS)

Packing Slip in English and containing the required elements listed below:

Seller's name and address

Buyer's name and address

Consignee name and address (if different)

Purchase order number

Grace product name and SAP Product Code

Comprehensive description of product

Quantity of product shipped
Box number or container number (if applicable)
Dimensions of shipment
Weight of shipment

Packing Slip shall be put outside box/crate/container marked "packing slip enclosed" and a copy is to be furnished with shipping documents.

Toxic Substances Control Act (TSCA) Import Certification

This document must be completed and signed by a US citizen and must accompany the goods. Shipments cannot clear Customs without TSCA Certification. Appropriate WRG personnel will complete all TSCA Certifications. If a TSCA Certification has not been provided, the vendor must contact the WRG personnel listed in the Contact and Notification Information, section 1. Once obtained, the vendor must include the TSCA Certification with the goods to be shipped to WRG.

NAFTA Certificate of Origin (if applicable) (see Special Trade Programs, section 6 below).

GSP Declaration (if applicable) (see Special Trade Programs, section 6 below).

Foreign Shipper's Declaration for U.S. goods returned (if applicable) (see U.S. Goods Returned, section 7 below).

Textile Declaration/Single Country/Multi Country (if applicable)

Dangerous/Hazardous Goods Statement (if applicable)

Other documentation as required

3. TARIFF CLASSIFICATION:

WRG requires the correct classification under the Harmonized Tariff Schedule of the United States ("HTSUS") to the 10th digit be incorporated into the Commercial Invoice for each product shipped to WRG. WRG will verify that the correct HTSUS classification is used for all products imported by WRG. WRG personnel will analyze the products from the vendor and assign a verified HTSUS classification, which will then be incorporated into an HTSUS database maintained by WRG. As requested by WRG, the vendor must also supply detailed product documentation (technical specifications, datasheets, marketing materials, etc.) necessary for WRG to complete the classification analysis for the product in question.

These verified HTSUS classifications will be provided by WRG to the vendor for their products. This verified HTSUS classification must then be incorporated into the invoice for each product and used for all shipments to WRG. On an annual basis, the vendor must submit a full listing of all products sold to WRG. This listing will be utilized by

WRG to ensure that the HTSUS classification database is current and contains verified HTSUS classifications for all products imported by WRG.

Throughout the year, new products may be sourced by WRG from the vendor. Since these new products would not exist in WRG's HTSUS classification database, a classification analysis must be conducted. For any new product to be shipped to WRG, the vendor must submit a full description of the product as well as any supporting documentation necessary to complete the classification analysis. Once the verified HTSUS classification is determined, it will be incorporated into WRG's classification database and provided to the vendor for use on the invoice.

As discussed above, the vendor is not to assign the HTSUS classification. The vendor must obtain a verified HTSUS classification for its product from WRG before shipping any products. If any HTSUS classification data is missing or unclear, the vendor is instructed to contact WRG according to the information provided in the Contact and Notification Information, section 1.

Classification of Samples:

WRG frequently receives product <u>samples</u> sent to the US for testing, evaluation, etc. The above HTSUS classification review procedures also apply to any sample shipped to WRG. The proper HTSUS classification of all samples must be included on the invoice accompanying the sample item(s). WRG must determine the correct HTSUS classification of any sample prior to shipment. The vendor must provide a complete description of the sample item, as well as any detailed product information requested by WRG. Once the correct HTSUS classification is determined by WRG, the information will be provided to the vendor for inclusion on the invoice. Please see Valuation, section 4, for other requirements specific to the shipment of samples to WRG.

Classification of U.S. Goods Returned:

For US origin goods shipped back to the US, use of the HTSUS heading 9801 provision is not permitted without written authorization from WRG. Please see the U.S. Goods Returned, section 7 below).

4. CUSTOMS VALUATION:

WRG typically uses transaction value as the method for appraisement for its imports into the US. Transaction value is defined as <u>"the price paid or payable"</u> of the merchandise when sold for export to the US. As a result, the value on the commercial invoice should always represent the amount being billed to WRG (please note exception in the Valuation of Samples section below).

Additions to the Price Paid or Payable:

In addition to the "price paid or payable", certain <u>additions to transaction value</u> must be captured and included on the commercial invoice (if applicable). If the vendor believes that any of the following may exist with respect to goods shipped to WRG, the vendor must contact the appropriate personnel at WRG to determine the appropriate value to include on the commercial invoice and declare to Customs.

Assists are the following items, if WRG provides them to the vendor free of charge or at a reduced cost (i.e., not sold to the vendor) for use in producing goods subsequently imported into the US. Information on any potential assists must be provided to the contact personnel at WRG indicated in section 1 so that they can conduct an analysis to determine if there should be an addition to the transaction value. Common assists include the following:

- Materials, components, parts, and similar items that are incorporated into the imported product
- Tool, dies, molds, and similar items used in producing the imported product
- Product consumed in producing the imported product
- Engineering, development, artwork, design work, plans and/or sketches that are undertaken outside the US

Items on the assist list can also represent additions to transaction value even if they are not provided directly to the vendor by WRG. These additions to value arise from **indirect payments**, which would occur if the vendor acquires any of the assist items and invoices WRG separately for the acquisition cost. Similarly, an indirect payment could occur if WRG is invoiced by a third party for any assist item that is provided to the vendor. The vendor must provide any available information on indirect payments to the indicated contact personnel at WRG so that they can conduct an analysis to determine if there should be an addition to transaction value.

Packing Costs (if not already included in the price paid or payable). The cost of packing merchandise for export to the US (including the cost of all containers, coverings, materials, and labor associated with packing) must be included in the price actually paid or payable in order for the amount to be considered a valid transaction value amount. The vendor must ensure that all applicable packing costs are incorporated into the invoice value charged to WRG. If the packing costs are not captured in the invoice value, the vendor must provide the cost information to the contact personnel at WRG indicated in section 1 so that they can determine whether there needs to be an adjustment to the transaction value of the shipment in question.

Selling Commissions – A selling commission is any commission paid to an agent of the seller (and incurred by the buyer) with respect to the imported merchandise. Selling commissions are typically included as part of the transaction value of the imported merchandise. Information on any selling commission must be provided to the contact personnel at WRG indicated in section 1 so that they can conduct an analysis to determine if the commission should be included as part of the transaction value. Although they may not be dutiable, the vendor must report any information related to buying commissions to WRG. Buying commissions are paid to an agent of the buyer for services performed in relation to the purchase of imported goods.

Royalties or Licensing Fees - The value of any royalty or license fee paid as a condition of sale of the imported product for export to the US. may be dutiable. The vendor must provide information on any royalties or license fees to the contact personnel at WRG indicated in section 1 who will in turn conduct an analysis to determine if the royalties or license fees should be included in the transaction value.

Proceeds of a Subsequent Resale – The value of any proceeds paid to the seller directly or indirectly from the sale, disposal, or use of the imported merchandise is dutiable and must be added to the price paid or payable. The vendor must provide information on any proceeds of a subsequent resale to the contact personnel at WRG indicated in section 1, who will conduct an analysis to determine if there needs to be an adjustment to transaction value.

Foreign Inland Freight – If the goods were not shipped on a through Bill of Lading, the cost of freight from the vendor to the foreign port of export must be added to the price paid or payable. The vendor must provide complete information on the costs of foreign inland freight, and itemize such costs on the invoice to WRG. Depending on the terms of sale, the WRG personnel (see 1) would then determine if the cost of foreign inland freight should be incorporated into the dutiable value of the shipment in question.

Deductions from the Price Paid or Payable:

International freight and insurance charges for imported goods can be <u>deducted</u> from the price paid or payable. If international freight and insurance are not incorporated into the price paid or payable by WRG, then no action is required by the vendor (this situation would typically occur for shipments with terms of sale of Ex-Works or Free On Board (FOB), Free Along Side (FAS), or Free Carrier, (FCA)). However, if international freight and insurance are incorporated into the price paid or payable (i.e., shipments with terms of sale other than Ex-Works, FOB, FAS, or FCA), WRG can only deduct these charges from the entered value if they:

- are itemized on the commercial invoice
- represent actual charges (estimated charges are not acceptable).

As a result, the vendor must itemize international freight and insurance on its invoices to WRG for any shipments with terms of sale other than Ex-Works, FOB, FAS, or FCA. If possible, the vendor should always include the actual international freight and insurance amounts to be charged. If the amounts on the invoices represent estimated charges, the vendor must notify the indicated contact personnel at WRG of this fact at the time the shipment is made. Once available, the vendor must immediately provide the actual international freight and insurance charges to the contact personnel at WRG indicated in section 1. The WRG personnel will then make the necessary adjustments to the transaction value of the shipment in question.

Valuation of Samples:

WRG frequently receives product samples sent to the US. for testing, evaluation, etc. Even though the sample is likely sent to WRG free of charge, it is imperative that the sample be properly valued. This requires that the sample value should reflect actual cost to acquire or produce the product, or the normal price that would have been charged to WRG for the product (i.e., the normal retail cost of the product plus a reasonable profit by the vendor). Once the proper sample value has been determined, the value should be incorporated into the invoice with the following language:

"Sample, Not for Resale – Value for Customs Purposes Only \$____."

See Tariff Classification, section 3, for other requirements specific to the shipment of samples to WRG.

5. COUNTRY OF ORIGIN / MARKING:

In general, every article of foreign origin entering the US. must be legibly marked with the English name of the country of origin. Additionally, the country of origin of the product must be declared on the commercial invoice.

Country of Origin Determination:

Goods imported by WRG under a special trade program (e.g., **NAFTA**, **GSP**, etc.) will have their own unique country of origin and qualification requirements. Please see Special Trade Programs, section 6, for more information.

For goods imported without the benefit of a special trade program, the country of origin determination is conducted as follows. For products made wholly of components/materials from a single country, the country of origin is the country of manufacture or growth of the product in question. For products manufactured with imported components/materials, the country of origin is the country in which the final product underwent a "substantial transformation" to become a new article of commerce. The criteria-giving rise to substantial transformation can vary from industry to industry and product to product. As a result, the vendor must contact WRG if there is any uncertainty over the proper country of origin determination for a product to be shipped to WRG.

Marking Requirements:

Articles and containers imported into the U.S. must be clearly marked in English according to the following guidelines:

Scope: Every article and/or its container (excluding goods of US origin) that is received by the ultimate purchaser in the US must be marked with the country of origin. **Location:** The markings must be conspicuous, read without strain and visible during casual handling.

Legibility: The markings must be clear, of adequate size, easily read by persons of normal vision.

Permanence: The marking must be indelible and as permanent as the product allows.

Language: All markings must be in English.

Statement: The markings must consist of the language "Made in (country)" or "Product of (country)"

Exemptions from the above marking requirements exist for certain imported articles and circumstances. These exemptions from marking requirements apply to the following:

- Articles incapable of being marked (including bulk products and crude substances).
- Products of US origin that are being returned to the US.
- Articles imported for use by the importer and not intended for sale in their imported or any other form.
- Articles imported into the US for further processing by the importer or for its account, through which any marking would be obliterated, destroyed, or permanently concealed.
- "Usual containers" from a NAFTA country (i.e., the U.S., Canada, or Mexico). An
 "usual container" is the container in which an imported article will ordinarily reach
 the ultimate purchaser. Usual containers, which are goods of a NAFTA country,
 are not required to be marked with their own origin, whether or not filled.

6. SPECIAL TRADE PROGRAMS:

Goods shipped to WRG from Canada or Mexico may qualify for duty-free treatment under the North American Free Trade Agreement ("NAFTA"). Additionally, some WRG imports may qualify for duty-free treatment under the Generalized System of Preferences ("GSP"). Specific rules exist for determining whether a product qualifies for the duty-free treatment under both NAFTA and GSP. The vendor is responsible for conducting the necessary analysis to qualify the products under NAFTA and GSP, if applicable. However, the vendor is not to indicate that the goods qualify for NAFTA or GSP without first obtaining approval from the responsible officials from WRG. In particular, the vendor is responsible for providing all information and declarations necessary for qualifying the goods under NAFTA or GSP to WRG for review. Once reviewed, WRG will indicate if it agrees that the goods are qualified for NAFTA or GSP. The vendor may not claim NAFTA or GSP on products shipped to WRG without this explicit approval from WRG. All claims for NAFTA or GSP by vendors are subject to audit by WRG. Information on the qualification requirements for NAFTA and GSP are provided below.

North American Free Trade Agreement (NAFTA):

Many products imported by WRG obtain duty-free treatment under **NAFTA**. **NAFTA** eliminates or reduces duties imposed on goods traded between the member countries, provided that the goods qualify as "originating" within the **NAFTA** territory (i.e., the US, Canada and Mexico).

It is imperative that assumptions are not made regarding origin being US, Canada and Mexico. Vendors are <u>required</u> to properly qualify their goods under **NAFTA** and complete a formal **NAFTA** Certificate of Origin for all qualifying products sourced by WRG. (A sample **NAFTA** Certificate of Origin is attached to these instructions as Appendix A). The **NAFTA** Certificate of Origin is the document used to certify that the goods being exported are "originating". The original **NAFTA** Certificate of Origin must be completed and signed by the exporter, and be maintained at WRG Import Departments. Vendors are required to recertify originating **NAFTA** products on a yearly basis.

It is critical that the **NAFTA** Certificates of Origin be accurately prepared. Key elements of the **NAFTA** Certificates of Origin that must be addressed are discussed below: The **NAFTA** certificates of origin must be signed and dated by an appropriate representative of the vendor.

The **NAFTA** certificates of origin must include an accurate description of each product (not just a part number or internal identifier).

The **NAFTA** certificates of origin must include the correct US tariff classification of each product according to the HTSUS.

The correct preference criterion – A, B, C or D – must be used for each product. These preference criteria indicate the manner in which a product qualifies for **NAFTA** preferential treatment, as indicated below:

<u>Criterion A</u> – This preference criterion is only used for goods that are "wholly obtained or produced entirely" in a **NAFTA** territory. Goods that can qualify for **NAFTA** under this criterion are generally limited to minerals and agricultural products that are mined or grown entirely within a **NAFTA** country and will therefore not normally be used for goods imported by WRG.

<u>Criterion B</u> – This preference criterion is used for goods that satisfy a specific rule of origin as defined in the HTSUS. Each product classification in the HTSUS will have its own qualification requirements, which will consist of a "tariff shift" and/or regional value content (RVC) calculation. Goods that require a tariff shift can qualify provided that each of the non-originating materials used in the production of the product undergoes an applicable **change in tariff classification** as the result of production occurring entirely in the territory of the **NAFTA** parties. Goods that require an RVC calculation can qualify provided that the value of the **NAFTA** originating materials/components meets a specified threshold. Many goods imported by WRG will qualify for **NAFTA** under this preference criterion.

<u>Criterion C</u> – This preference criterion is used for goods that are produced entirely within the territory of a **NAFTA** country exclusively from originating materials/components. Goods are produced **entirely** in the territory of one or more of the **NAFTA** countries, but one or more of the non-originating materials used in the

production of the good which is provided for as "parts" under the HTSUS does not undergo a change in tariff classification. Some goods imported by WRG could qualify for **NAFTA** under this preference criterion.

<u>Criterion D</u> – This preference criterion is only used in limited circumstances for products where the RVC calculation for non-originating materials/components has been met, but the materials/components do not undergo a tariff shift because: a) the goods are imported into a **NAFTA** country in an unassembled or disassembled form but classified as an assembled good, or b) the goods are produced using materials imported into a **NAFTA** country that are provided for as parts according to the Harmonized System, and those parts are classified in the same subheading or undivided heading as the finished goods. This preference criterion will not likely be used for goods imported by WRG.

Generalized System of Preferences (GSP):

Some products imported by WRG obtain duty-free treatment under **GSP**. **GSP** is used by the US and other countries to help certain developing nations improve their financial or economic condition through exports. It provides for the duty-free importation of a wide range of products from beneficiary countries, as designated by the President of the US. Each good eligible for **GSP** is designated in the HTSUS under its tariff classification. Once it has been determined that good(s) to be imported are eligible for **GSP**, a number of qualification requirements must be met as discussed below: The origin of the product must be a designated beneficiary country, as specified in the HTSUS for that product's classification.

The goods must be imported directly from the beneficiary country, and cannot enter the commerce of another country before reaching the US.

The goods must be deemed a product of the beneficiary country in question. If the product contains materials/components from a non-beneficiary country, this requires that the sum of the value materials/components originating in a beneficiary country plus the "direct cost of processing operations" performed in a beneficiary country is not less than 35% of the appraised value of the final product when imported into the U.S. The direct cost of processing includes all labor, quality control, engineering, and testing associated with the production of the final product.

The vendor must complete a statement attesting to the fact that the goods meet the above-mentioned criteria. This attestation must be included with each import shipment. If the product contains materials/components from a non-beneficiary country, a **GSP** Declaration must be completed that incorporates the following information for each imported product:

- a description of the final product;
- a description of the processing operations undertaken in the beneficiary country;
- a breakdown of the direct cost of processing operations undertaken in the beneficiary country;
- a description of each of the material/component, the production process for each material/component, and the country of origin of each material/component; and
- a breakdown of the cost of each of the materials/components.

7. U.S. GOODS RETURNED:

WRG utilizes special provisions in the HTSUS for goods of US origin that are exported and subsequently returned to the US. These special provisions, under **HTSUS 9801.00** (U.S. Goods Returned) allow for the duty-free entry of products of US origin if they were not advanced in value or improved in condition while abroad.

The vendor is not to indicate that the goods qualify as U.S. Goods Returned under HTSUS 9801 without first obtaining approval from the responsible officials from WRG. In particular, the vendor is responsible for providing all information and declarations necessary for qualifying the goods under HTSUS 9801. Once reviewed, WRG will indicate if it agrees that the goods are qualified as U.S. goods returned. The vendor may not classify products shipped to WRG as HTSUS 9801 without this explicit approval from WRG. All uses of HTSUS 9801 by vendors are subject to audit by WRG.

There are specific criteria that must be met for a product to qualify for duty-free treatment under HTSUS 9801, as well as certain documentation requirements including a **Foreign Shipper's Declaration** that must be provided by the vendor. Specifically, a returned product qualifies for HTSUS 9801 only if it satisfies each of the following qualification criteria and documentation requirements:

- The product must be of US origin.
- WRG will produce or obtain (in the case of products purchased from third parties)
 a Manufacturer's Affidavit (or NAFTA Certificate of Origin) to verify the US origin
 claim for the product in question.
- The product must not have been advanced in value or improved in condition by any process of manufacture or other means while abroad (sorting, separating by grade, packing, etc., are allowed as they are not considered to advance the value of the US item itself).

The <u>vendor</u> must prepare a <u>Foreign Shipper's Declaration</u> for any product qualifying as HTSUS 9801.00 and valued at over US\$2,000. The Declaration must accompany the import documentation, and must be signed and dated by an appropriate official from the vendor and attest to the fact that the products were not advanced in value or improved in condition abroad. For each qualifying products, the Declaration must also include a description of each of the qualifying products, the quantity of each product being returned, and the value of each product being returned. A sample declaration is attached at the back of the instructions in Appendix B. The product must have been previously exported from the US. WRG will supply proof of export as needed, through an export invoice, bill of lading, or other commercial documentation. The product must not have been the subject of a drawback claim related to the export. The product must not have been manufactured in a US bonded warehouse. The product must not have been previously entered into the US under a Temporary Importation Bond, HTSUS 9813.00.05.

8. Wood Packing Material:

The statutory requirements of 7 C.F.R. §319.40-3 mandate that regulated WPM – such as, crates, boxes, and pieces of wood used to support or brace cargo – being imported into the United States shall be heat treated or fumigated with methyl bromide in accordance with EPA label instructions and include a mark that certifies the wood completed the required treatment under the "Guidelines for Regulating Wood Packing Material in International Trade," ISPM 15 of the International Standards of Phytosanitary Measures (ISPM) and any associated amendments, revisions or exemptions identified by the U.S. Department of Agriculture, Animal and Plant Health Inspection Service (APHIS).

The regulation (7 C.F.R. §319.40-3) requires that WPM display a visible, legible, and permanent mark certifying treatment. The mark must be a legible and permanent mark that indicates that the article has been subjected to the approved measure and include the following elements:

- The International Plant Protection Convention (IPPC) logo;
- The ISO two-letter country code for the country that produced the wood packing material followed by a unique number code;
- The unique number code is assigned by the country's National Plant Protection Organization (NPPO) to the producer of the wood packaging material, who is responsible for ensuring appropriate wood is used and properly marked. Therefore, this code allows a trace back to the facility that treated and stamped the WPM; and
- An abbreviation that discloses the type of treatment (HT for heat treatment or MB for methyl bromide fumigation; Guatemala is approved to use TT in place of HT or BM in place of MB).