

Technical Requirements

United States – Canada Greenhouse-Grown Plant Certification Program (GCP)

June 17, 2014

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Amendment Record

Amendments to the Technical Requirements of the United States – Canada Greenhouse-Grown Plant Certification Program (GCP) will be given a consecutive number, dated and filed with the respective NPPO.

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PART I – Introduction

The United States - Canada Greenhouse-Grown Plant Certification Program (GCP) is a bilateral export certification program for greenhouse grown plants. Facilities that enter into a Compliance Agreement with their National Plant Protection Organization (NPPO) (i.e. either APHIS or CFIA) may be authorized to export Certified Plants to the United States or Canada with an Export Certification Label (ECL) in lieu of a phytosanitary certificate. Certified plants are greenhouse-grown plants which have completed all the requirements of the GCP, are free from regulated pests and practically free from other injurious pests, and meet all of the phytosanitary import requirements of Canada and the United States. CFIA and APHIS conduct audits at the facilities in their country to authorize facilities and verify compliance with the GCP.

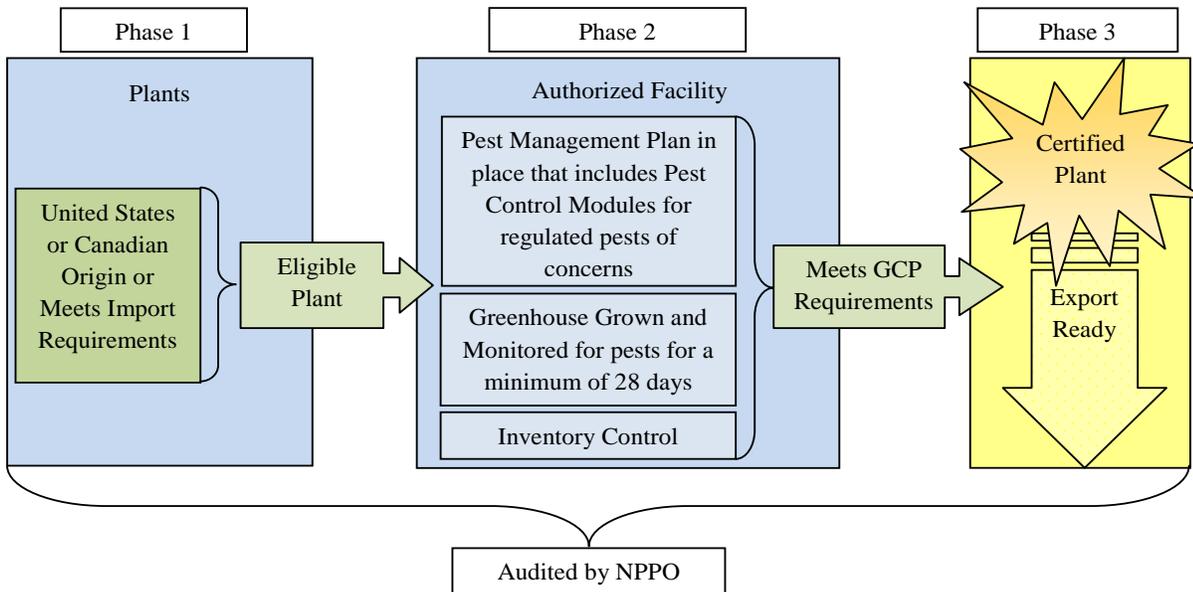
The GCP takes place in 3 distinct phases: prerequisites for plants entering the GCP; activities which take place at an Authorized Facility; and shipment of Certified Plants.

Phase 1 – Prior to Entry into Program: Greenhouse grown plants must originate in Canada or the United States, or if imported from a third country, must be enterable into the United States and Canada as per each country’s phytosanitary regulations. Plants that meet these requirements are Eligible Plants and may enter into the GCP.

Phase 2 – Activities at an Authorized Facility: Eligible Plants that are produced under a written Pest Management Plan at an Authorized Facility may become Certified Plants.

Phase 3 – Shipment of Certified Plants: Certified Plants are ready for export and may be shipped between the United States and Canada using an Export Certification Label in lieu of a phytosanitary certificate or between Authorized Facilities in the same country using an Interfacility Stamp.

Figure 1 United States – Canada Greenhouse-Grown Plant Certification Program Overview



Note: Participation in the GCP is voluntary. Plants grown in non-authorized facilities or plants that are not eligible for GCP certification may be exported using Phytosanitary Certificates based on product inspections by Authorized Certification Officials of the exporting NPPO.

1.0 Purpose

This Technical Requirements document describes the Greenhouse-Grown Plant Certification Program, including general program requirements (PART II), NPPO responsibilities (PART III), facility responsibilities, authorization processes, and compliance agreement elements (PART IV), and appendices that include reference materials (PART V).

2.0 Authority

Regulatory authority is provided by:

a. CFIA:

Plant Protection Act. S.C. 1990. c.22

Plant Protection Regulations, SOR/95-21 2

Canadian Food Inspection Agency Act S.C. 1997, c. 6

b. APHIS:

United States Plant Protection Act, June 20, 2000

United States Code of Federal Regulations CFR 319

United States Code of Federal Regulations CFR 360

3.0 References

CFIA Directive D-08-04: Plant Protection Import Requirements for Plants and Plant Parts for Planting: Preventing the Entry and Spread of Regulated Plant Pests Associated with the Plants for Planting Pathway.

CFIA Directive D- 96-20: Canadian Growing Media Program, Prior Approval Process and Import Requirements for Plants Rooted in Approved Media.

CFIA Automated Import Reference System (AIRS).

USDA APHIS Plants for Planting Manual.

USDA APHIS Canadian Border Agricultural Clearance Manual.

Electronic Code of Federal Regulations, TITLE 7—Agriculture, Subtitle B—Regulations of the Department of Agriculture, Chapter III—Animal and Plant Health Inspection Service, Department of Agriculture, Part 319, Foreign Quarantine Notices, Subpart 319.37 Plants for Planting, and Part 360 Noxious Weed Regulations.

ISPM 5. International Standards for Phytosanitary Measures. Glossary of Phytosanitary Terms. 2007, FAO.

ISPM 14. The Use of Integrated Measures in a Systems Approach for Pest Risk Management. 2002, FAO.

ISPM 36. Integrated Measures for Plants For Planting. 2012, FAO.

Risk and Risk Mitigation Associated with the Importation of Propagative Plant Material into NAPPO Member Countries. A Concept Paper Prepared by the NAPPO Plants for Planting Panel. August 3, 2004.

RSPM 5. NAPPO Glossary of Phytosanitary Terms. NAPPO, 2012.

RSPM 24. Integrated Pest Risk Management Measures for the Importation of Plants for Planting into NAPPO Member Countries. 2005, NAPPO.

Note: Links to specific regulatory references can be found in PART II, Section 2.1 and 2.2.

4.0 Glossary

Definitions for phytosanitary terms used may be found in ISPM 5, Glossary of Phytosanitary Terms (IPPC, 2005), in RSPM 5, NAPPO Glossary of Phytosanitary Terms (Revised) (NAPPO, 2012) and in RSPM 24, Integrated Pest Risk Management Measures for the Importation of Plants for Planting into NAPPO Member Countries (NAPPO, 2005).

APHIS: United States Department of Agriculture, Animal and Plant Health Inspection Service.

Authorized Facility (General): A facility which is under compliance agreement with the NPPO of the exporting country to participate in the GCP.

Authorized Facility (Plant Broker): An Authorized Facility which ships plants produced by other Authorized Facilities, but does not own or operate a facility for producing plants.

Authorized Facility (Place of Production): An Authorized Facility where plants are grown. Places of production may have a broker function.

CFIA: Canadian Food Inspection Agency.

CEPM: FAO Committee of Experts on Phytosanitary Measures.

Certified Plant: greenhouse grown plant that meets the import requirements of the United States and Canada, is grown at an Authorized Facility, meets the phytosanitary requirements of the GCP, and is ready for export.

Continental United States: The area of the United States of America comprised of the 48 states and the District of Columbia that are south of Canada and north of Mexico, plus the state of Alaska.

Country of origin (of a consignment of plants): Country where the plants were grown [FAO, 1990; revised CEPM, 1996; CEPM, 1999].

Eligible Plant: A plant that meets the prerequisite phytosanitary conditions to be entered into the GCP.

Export Certification Label: An official document or label issued by the NPPO for use by an Authorized Facility in lieu of a phytosanitary certificate.

FAO: Food and Agriculture Organization of the United Nations.

Greenhouse: For the purpose of the GCP, a greenhouse is the physical location where plants are grown within, under, or sheltered by structures to provide a modified growing condition and/or protection from pests and adverse weather. These structures may include greenhouses, hoop houses, screen houses, shade houses, or other structures that are determined by the NPPO of the exporting country to meet the minimum operating requirements of GCP.

Greenhouse-grown Plant: A plant propagated and grown in a greenhouse.

Growing medium: Any material in which plant roots are growing or intended for that purpose [FAO, 1990].

Hardening off: Procedure used for acclimating indoor greenhouse grown plants to outdoor conditions.

Integrated pest risk management measures: composite of different measures, at least two of which acting independently, with a cumulative effect of reducing the risk of pest introduction (RSPM 24. 2005, NAPPO).

Interfacility Stamp: An official stamp applied to the shipping documents to indicate that the plants are GCP Certified Plants moving domestically between Authorized Facilities.

IPPC: International Plant Protection Convention, as deposited in 1951 with FAO in Rome and as subsequently amended (FAO, 2002).

NAPPO: North American Plant Protection Organization.

Non-compliance: Activities or products found to be contrary to, or in violation of, the specified requirements of the GCP.

Non-conforming plants: Plants that have not met the requirements of the GCP. This category includes plants that are not eligible for the GCP, or plants that are eligible for the GCP but have not yet met the requirements to be shipped using an Export Certification Label or Interfacility Stamp.

NPPO: National plant protection organization [FAO, 1990; ICPM, 2001] The NPPO of Canada is the Canadian Food Inspection Agency (CFIA). The NPPO of the United States is the Animal and Plant Health Inspection Service (APHIS) of the United States Department of Agriculture.

Pest: Any species, strain, or biotype of plant, animal or pathogenic agent injurious to plants or plant products (FAO 2004, ISPM 5).

Pest Control Manager: The person at an Authorized Facility who is responsible for developing, maintaining and implementing procedures at the Authorized Facility to consistently meet all requirements of the GCP.

Pest Management Plan: A written description of procedures or processes designed to control, suppress or eradicate pest populations and produce plants that meet the phytosanitary requirements of the GCP.

Pest Control Module: an addendum to the Pest Management Plan that addresses specific pest mitigation measures implemented at an Authorized Facility in order to produce plants that are free from regulated pests.

Phytosanitary certificate: Certificate patterned after the model certificates of the IPPC [FAO, 1990].

Plants: Living plants and parts thereof, including seeds and germplasm [FAO, 1990; revised IPPC, 1997].

Practically free: A consignment, field or Place of Production, without pests (or a specific pest) in numbers or quantities in excess of those that can be expected to result from, and be consistent with, good culturing and handling practices employed in the production and marketing of the commodity (FAO 2004, ISPM 5).

Record: Evidence or information constituting an account of something which has occurred. Records provide evidence that the requirements of the GCP have been met and that plants shipped are in conformance with program requirements.

Soil: The loose surface of the earth in which plants grow, in most cases consisting of disintegrated rock with an admixture of organic material (NAPPO RSPM No. 5)

Surveillance audit: Verification of the status of the Authorized Facility through monitoring of plants during active plant growth, records, and administrative procedures (including the Pest Management Plan).

Systems audit: A systematic examination of the organizational structure, procedures, processes and resources used in implementing the GCP by the Authorized Facility.

USDA: United States Department of Agriculture.

PART II – General Program Requirements

1.0 GCP Requirements

Plants produced under the United States – Canada Greenhouse-Grown Certification Program, must be free from regulated pests, practically free from other injurious pests, and meet the phytosanitary import requirements of Canada and the United States.

2.0 Import Requirements of Canada and the United States

The following are the import requirements for plants for planting for Canada and the United States. These references may not be all inclusive. Please contact a regulatory official for confirmation of the requirements.

2.1 Canada

CFIA Directive D-08-04: Plant Protection Import Requirements for Plants and Plant Parts for Planting: Preventing the Entry and Spread of Regulated Plant Pests Associated with the Plants for Planting Pathway. <http://www.inspection.gc.ca/plants/plant-protection/directives/date/d-08-04/eng/1323752901318/1323753612811>

CFIA Directive D- 96-20: Canadian Growing Media Program, Prior Approval Process and Import Requirements for Plants Rooted in Approved Media. <http://www.inspection.gc.ca/plants/plant-protection/directives/imports/d-96-20/eng/1323854223506/1323854308201>

CFIA Automated Import Reference System (AIRS).
<http://www.inspection.gc.ca/plants/imports/airs/eng/1300127512994/1300127627409>

2.2 United States

USDA APHIS Plants for Planting Manual -
http://www.aphis.usda.gov/import_export/plants/manuals/ports/downloads/plants_for_planting.pdf

USDA APHIS Canadian Border Agricultural Clearance Manual -
http://www.aphis.usda.gov/import_export/plants/manuals/ports/downloads/canadian_border.pdf

Electronic Code of Federal Regulations, TITLE 7—Agriculture, Subtitle B—Regulations of the Department of Agriculture, Chapter III—Animal and Plant Health Inspection Service, Department of Agriculture, Part 319, Foreign Quarantine Notices, Subpart 319.37 Plants for Planting (http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=8efd87bf6920ff5ecd1838f1ee0b20d3&tpl=/ecfrbrowse/Title07/7cfr319_main_02.tpl) and, Part 360 Noxious Weed Regulations (<http://www.ecfr.gov/cgi-bin/text-idx?SID=d1819631de05c1e903126a01ae98be28&node=7:5.1.1.1.18&rgn=div5>).

3.0 Eligible Plants

The eligibility of plants to enter the GCP is based on meeting regulatory requirements for individual plant taxa and/ or country of origin.

To be eligible for entry into the GCP, plants must be enterable into both the United States and Canada.

The Authorized Facility must ensure that the plants have met the phytosanitary import requirements of the United States and Canada, as per regulatory requirements specified in this Part, Section 2.1 and 2.2.

For example, plants must:

- Not be prohibited,
- Not be listed as Not Allowed Pending a Pest Risk Assessment (NAPPRA) into either the United States or Canada directly from the country of origin,
- Meet size/age requirements, and
- Meet any other regulation that may be applicable.

The following articles are not eligible plants and may not be certified through the GCP:

- True seeds
- Grains
- Potatoes (*Solanum tuberosum*)
- Regulated invasive plants
- Regulated noxious weeds
- Prohibited plants

The Authorized Facility must ensure that plants are free of regulated pests of concern to Canada and the United States and practically free of other injurious pests. Authorized Facilities are required to maintain a current list of plants propagated at their facility for certification using this program, and the list must be accepted by the exporting country's NPPO. The NPPO verifies that the plants (taxa, origin, propagule types) on the plant list are eligible for inclusion in the GCP. The NPPO will provide guidance in assessing what plants are eligible, or ineligible.

The GCP is intended for plants that have been propagated and grown in a greenhouse from seed, in-vitro/tissue culture plantlets, cuttings, plugs, bare-root plants, or pre-finished plants, up to the time the plants leave the greenhouse production system. The GCP is not intended for plants produced outside of a greenhouse.

Woody plants and perennials may be eligible for the GCP if they are exclusively greenhouse grown.

There may be provision for greenhouse-grown plants to be grown outdoors for a portion of their production either for hardening off or under specific conditions which are detailed in the Pest Management Plan and accepted by the NPPO (see also Part V, [Section 2.2.8](#), Hardening Off)

Plants entering into Canada or the continental United States in media, at the time of entry, must also have met the requirements of both the United States Growing Media Program AND the Canadian Growing

Media Program to be eligible for inclusion in the GCP based on bilateral agreement. Specific plant taxa and production practices may be eligible for the GCP or may be excluded from the program based on agreement between APHIS and CFIA.

4.0 Growth and Monitoring

Certified Plants must have been greenhouse-grown in an Authorized Facility for a sufficient period of time to verify that the plants are free from regulated pests, and are practically free from other pests, and meet the phytosanitary import requirements of Canada and the United States and to be considered ready for export. The time in the facility includes specific monitoring for pests as described in the Authorized Facility's pest management plan. The requirement for plants to be grown at an Authorized Facility for a minimum period is intended to provide time for the plants to be evaluated for pest presence and to conduct appropriate pest risk mitigation measures.

The following require a minimum growth and monitoring period of 28 days:

- Rooted plants with a country of origin of the United States or Canada.
- All plants with a country of origin other than the Canada or the United States.

A growth and monitoring period of more than 28 days may be required, at the discretion of the NPPO, depending on the risk associated with the plants.

The Pest Management Plan must describe the monitoring and pest mitigation provisions for plants which do not require a minimum growth and monitoring period of 28 days at an Authorized Facility. This may include plants grown from seed, tissue culture, or cuttings with a country of origin of the United States or Canada.

Plants that arrive at the Authorized Facility with a GCP Export Certification Label or Interfacility Stamp are considered to have met the minimum growth and monitoring period of 28 days.

Plants that arrive at the Authorized Facility with a country of origin of the United States or Canada declared on a phytosanitary certificate issued by Canada or the United States are considered to have met the minimum growing period of 28 days.

Plants that arrive at the Authorized Facility from a non-GCP facility in the same country may be considered to have met the minimum growing period of 28 days provided they meet all the following conditions:

- The country of origin of the plants is Canada or the United States, and
- The plants are exclusively greenhouse grown, and
- The plants receive an official phytosanitary inspection verifying that the phytosanitary requirements of Canada and the United States are met.

Eligible plants that arrive at the Authorized Facility from a non-GCP facility with a country of origin other than the United States or Canada require a minimum growth and monitoring period of 28 days.

5.0 Regulated Pests

Authorized facilities are responsible for inspecting eligible plants entering the facility for the presence of pests regulated by both the United States and Canada. Any unknown pests detected must be identified to determine pest status. While APHIS and CFIA each publish lists of regulated pests, these references are not all inclusive. Please contact a regulatory official for confirmation of the requirements.

Some U.S. Regulated pests may be found at:

http://www.aphis.usda.gov/import_export/plants/plant_imports/downloads/RegulatedPestList.pdf

The List of Pests Regulated by Canada may be found at:

<http://www.inspection.gc.ca/english/plaveg/protect/listpespare.shtml>

Pests that are new to Canada and/or the continental United States will be considered regulated for the purpose of the GCP until their regulatory status is determined.

6.0 Pest Management Plan

All Authorized Facilities are required to have a written Pest Management Plan (PMP) that follows the template in Appendix I (see also [Part IV, Section 2.2.4](#)). The PMP must be implemented throughout the entire Authorized Facility in a manner that will assure consistent compliance with the requirements of the GCP.

6.1 Pest Control Modules for Regulated Pests

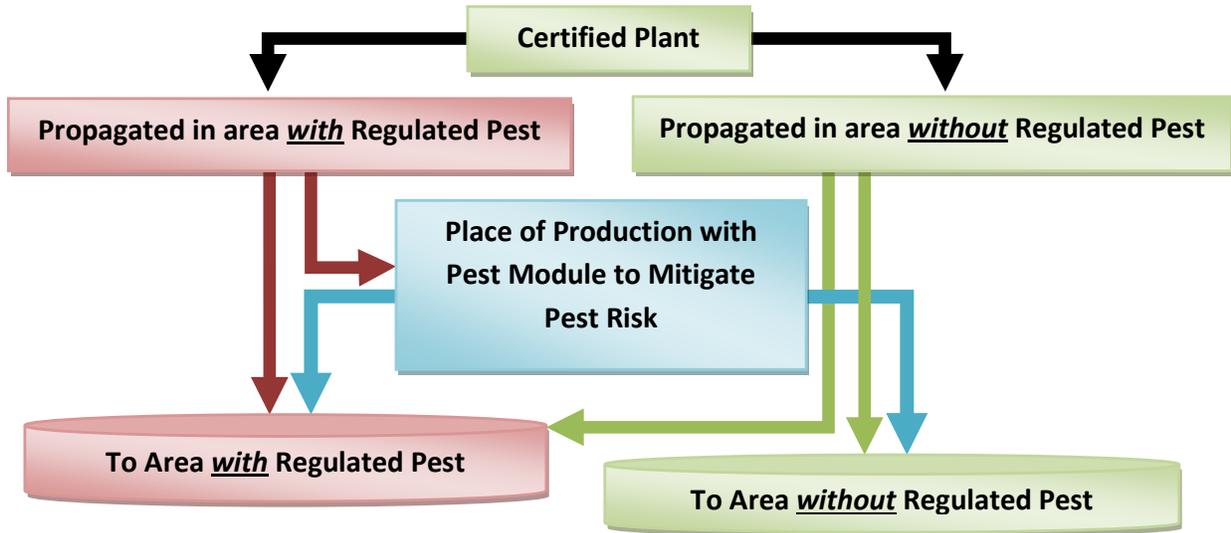
When an authorized GCP facility is located in an area where a pest(s) regulated by either country occurs, then the Pest Management Plan must include appropriate Pest Control Modules (PCM). A Pest Control Module will be required for the plants in production when a regulated pest is present in the area where the Authorized Facility is located, and there is a reasonable need for specific mitigating measures to prevent the spread of regulated pests via GCP plants. The PCM must describe the measures in place to control regulated pests, and must be reviewed and accepted by the NPPO responsible for authorizing the facility. A PCM is always required when a phytosanitary certificate would require an additional declaration for export of the same plants.

Facilities must have the appropriate PCM in place in order to be authorized under the GCP and to use an Interfacility Stamp or Export Certification Labels.

Appendix II includes a list of pests regulated by APHIS and/or CFIA which may require a PCM under the PMP.

A PCM may not be required for a specific regulated pest if the Authorized Facility only exports to areas infested with the same regulated pest in the other country, see *Figure 2* below.

Figure 2 Movement of Certified Plants



Note: Please contact a regulatory official for information regarding the distribution of regulated pests within Canada and the United States.

If an Authorized Facility does not have PCM in place for all regulated pests in the area where the facility is located, it may not utilize an Interfacility Stamp.

A PCM identifying pest mitigation and monitoring measures may be required if the plants are entering the GCP from a country other than the United States or Canada. Authorized facilities must work with their respective NPPO to determine any pest mitigation measure that may be required.

PART III – NPPO Responsibilities

1.0 General Information

APHIS and CFIA have jointly established the GCP technical requirements, through bilateral agreement, with the same criteria applied in both countries for administration and implementation of the GCP in their respective countries. The NPPOs are responsible for working together to review and update the GCP.

The NPPOs are responsible for implementing the necessary legislation and authorities to support the GCP; ensuring that the necessary forms and labels are available; that guidance and training are provided to facilities and inspectors; and that there is adequate oversight and delivery of the GCP.

The NPPOs will employ the same compliance agreement elements (Part IV, Section 2) so that compliance agreements between APHIS and authorized facilities in the United States and compliance agreements between CFIA and authorized facilities in Canada are equivalent.

The NPPOs will verify that the plants (taxa, origin, propagule types) grown and certified for export under the GCP are eligible for inclusion in the GCP, are greenhouse-grown and monitored for pests for the prescribed period, and that only plants eligible for certification are shipped using an Export Certification Label. The NPPO will provide guidance in assessing which plants are eligible or ineligible and on meeting any importing country requirements. The NPPO will verify that plants that are not authorized for importation into either the United States or Canada are not certified under the GCP.

2.0 Responsibility for Oversight

Oversight of the GCP is administered by APHIS and CFIA. The NPPOs may delegate responsibility for audit and oversight of the GCP to another government authority. Delegated responsibilities are subject to a systematic annual review by the NPPO.

3.0 GCP Review and Maintenance

The CFIA and APHIS will work together to update the GCP Technical Requirements and supporting documents as required. An annual GCP review will be held to evaluate the performance of the GCP and identify individual program issues, and recommend changes to improve the GCP. The annual review will include an exchange of non-compliance information, including suspension, cancellation and notices of non-compliance, evaluation of the program components and any new information since the last annual review. The GCP will undergo a full program review by APHIS and CFIA every five (5) years.

4.0 GCP Site Visits

The CFIA and APHIS may conduct an on-site review of any participant of the GCP in the other NPPO's territory in order to evaluate the functionality and compliance with the requirements of the GCP. Review may include any element of the GCP or any other document incorporated by reference. The requesting party will provide at least thirty (30) days written notice of their intention to conduct an on-site review to the other NPPO.

5.0 Communication between APHIS and CFIA

The NPPOs commit to communicating with each other regularly to facilitate the successful administration and operation of the GCP. They will also share information when the status of a facility changes due to a quarantine significant issue, including any corrective actions and final outcomes.

The NPPOs will routinely exchange lists of authorized facilities which will include the facility operating name, registration number and address

As soon as practical, the NPPOs will formally notify each other when:

- Regulated pests are detected on Certified Plants at the time of import into the United States or Canada;
- New or emerging pests of quarantine concern are detected at an Authorized Facility;
- Non-conforming plants have been exported using an Export Certification Label;
- Regulated pests outside their known distribution are detected in an Authorized Facility.

5.1 Communications with Border Services

The NPPOs will communicate with their respective customs and border service organizations to inform them of changes to the GCP.

5.2 Communications with Stakeholders

The NPPO's will communicate with Authorized Facilities and other interested stakeholders to provide program updates, information on new pests of concern and other relevant issues that could impact the operation of the GCP or affect the phytosanitary security of either country.

6.0 Records Maintained by the NPPO

6.1 Authorized Facilities List

The NPPOs will maintain lists of Authorized Facilities in their respective countries and supply that list to their counterpart as needed or upon request. Newly Authorized Facilities will be added to the list when they complete their authorization. When a compliance agreement is canceled the facility will be removed from the list.

The Authorized Facility list will contain:

- Facility name
- Contact information
- Business address
- Physical address/location of Authorized Facility
- Registration number

6.2 Authorized Facilities Records

The NPPO will maintain a file for each Authorized Facility under their administration containing:

- The original completed Application submitted for entry into a compliance agreement for designation as an Authorized Facility in the GCP;
- Current signed compliance agreement;
- Copies of the reviewed Pest Management Plan;
- Serial numbers of all Export Certification Labels and number of Interfacility Stamps issued;
- Copies of all Audit Reports;
- Copies of all Corrective Action Requests (CARs);
- Any written statement of corrective action taken by the Authorized Facility as a result of non-compliance identified during the audit process;
- Copies of any notification of suspension and reinstatement; and
- Copies of any correspondence.

7.0 Export Certification Labels and Interfacility Stamp

The NPPO will determine the format of Export Certification Labels and Interfacility Stamps, how they are obtained and who may manufacture them. All Export Certification Labels and Interfacility Stamps authorized by the NPPO within their jurisdiction will be standardized and have the same format and security features. It is not necessary for the two NPPOs to utilize identical Export Certification Labels or Interfacility Stamps.

A unique registration number assigned to the Authorized Facility appears on the Interfacility Stamp and on each Export Certification Label. Each Export Certification Label also has a printed serial number, making each label unique.

NPPOs will have a mechanism in place to allow of the surrender of Export Certification Labels and Interfacility Stamps in the event that the facility has its authorization suspended or cancelled.

NPPOs will formally notify each other of the format and design, or any changes to the format and/or design of the Export Certification Label and/or Interfacility Stamp.

7.1 Export Certification Label

Export Certification Labels will bear the following:

- “United States – Canada Greenhouse-Grown Plant Certification Program”
- Identification of the authorizing NPPO
- Authorized Facility registration number
- Unique serial number
- Certification statement

The following certification statement will appear on the Export Certification Label,

“The plants have been produced under the United States – Canada Greenhouse-Grown Plant Certification Program, are free from regulated pests, practically free from other injurious pests, and meet the phytosanitary import requirements of both Canada and the United States.”

No pest-specific or plant-specific additional declarations will be required to appear on the GCP export documents.

7.2 Interfacility Stamp

The Interfacility Stamp is for plants that are moved between Authorized Facilities within the same country and is used to demonstrate that the plants in the consignment are Certified Plants and are ready for export.

Interfacility Stamps will bear the following:

- “United States – Canada Greenhouse-Grown Plant Certification Program”
- Identification of the authorizing NPPO
- “Interfacility Stamp”
- Authorized Facility registration number

8.0 Authorization of Facilities

8.1 Application for Facility Authorization

The NPPO is responsible for reviewing the GCP application and all associated documentation received from facilities in their respective countries. The application template can be found in Part V, Appendix III and the GCP application must include the documents and information specified in Part IV, Section 1. When the documentation presented indicates that the facility has the capability to meet the requirements of the GPC then an authorization audit will be conducted.

8.2 Evaluating the Pest Management Plan

The required elements of the Pest Management Plan (Part V, [Appendix I](#)) may function as a checklist for evaluation.

The Pest Management Plan will not be the same for every facility, but must be fit for purpose, depending on the plants being produced, the physical characteristics of a facility, including its location relative to established regulated pests, and any special requirements or pest-specific modules.

When the Authorized Facility notifies the NPPO of an update to the Pest Management Plan an assessment will be required to verify that the requirements of the GCP will continue to be met. The Pest Management Plan should be re-evaluated at each systems audit.

8.3 Review of Eligible Plant List

Each Authorized Facility maintains a list of plants being shipped under the GCP. The NPPO will verify that the plants (taxa, origin, propagule types) on the plant list maintained by the Authorized Facility are

eligible for inclusion in the GCP. Plants that are not authorized for importation into either the United States or Canada are ineligible for the GCP.

8.4 Authorization Audit

The authorization audit is a systems audit conducted upon successful completion of the documentation review at facilities applying for participation in the GCP. The purpose of the Authorization Audit is to demonstrate that all components of the compliance agreement have been implemented at the facility. If conditions resulting in Corrective Action Requests are identified during the Authorization Audit, they must be resolved prior to entering into a compliance agreement with the Authorized Facility. A successful authorization audit will verify whether or not the facility meets the requirements of the compliance agreement (see [Part IV](#)).

8.5 Compliance Agreement and Authorization

If the documentation and audit are satisfactory then the facility may enter into a compliance agreement with the NPPO (Part IV, Section 2.0) and be considered an Authorized Facility. When the registration number has been assigned the Authorized Facility may obtain Export Certification labels and/or Interfacility Stamps.

9.0 Audit of Authorized Facilities

NPPOs will conduct audits of Authorized Facilities to:

- Confirm that the requirements specified in the Compliance Agreement are adhered to by the Authorized Facility; and
- Identify elements that contribute to non-compliance and facilitate the continuous improvement of the GCP.

9.1 Types of Audits

A combination of systems and surveillance audits are used to verify that the Authorized Facility meets the requirements established by the compliance agreement between the Authorized Facility and the NPPO. The audits collect and/or record objective evidence to demonstrate that the integrated pest risk management measures are functioning as intended and that Certified Plants consistently meet the requirements of the GCP. When non-compliances or non-conformances are identified during an audit, corrective measures are taken to prevent any reoccurrences.

The GCP audit checklists are found in Appendices IV and V.

9.1.2 Systems Audit

Systems audits are a systematic examination of the complete organizational structure, procedures, processes and resources used in implementing the GCP by the Authorized Facility. The objective of the systems audit is to verify that the Authorized Facility has the necessary systems, tools, procedures, processes and a Pest Management Plan that result in the Authorized Facility consistently meeting the requirements of the GCP.

9.1.3 Surveillance Audit

Surveillance Audits are routine verification of the status of the Authorized Facility, including monitoring of plants, records, and administrative procedures to verify that the Authorized Facility meets the requirements of the GCP on an ongoing basis. Surveillance audits typically focus on specific elements of the GCP at the Authorized Facility, and should encompass the complete organizational structure over time.

9.2 Facility Status and Audit Frequency

9.2.1 Conditional Status

Following authorization, audits will be conducted at a minimum frequency of one audit per quarter. This includes a minimum of one systems audit per year. At least one surveillance audit must take place during the production period of the plants intended for export. The audit frequency of one audit per quarter is known as Conditional Status.

9.2.2 Standard Status

After successful completion of the first year, and a good compliance record, the audit frequency may be reduced to one systems audit and one surveillance audit annually. These audits must be conducted on separate occasions during the period of time when the Authorized Facility is producing plants for export. The audit frequency of two audits annually is known as Standard Status.

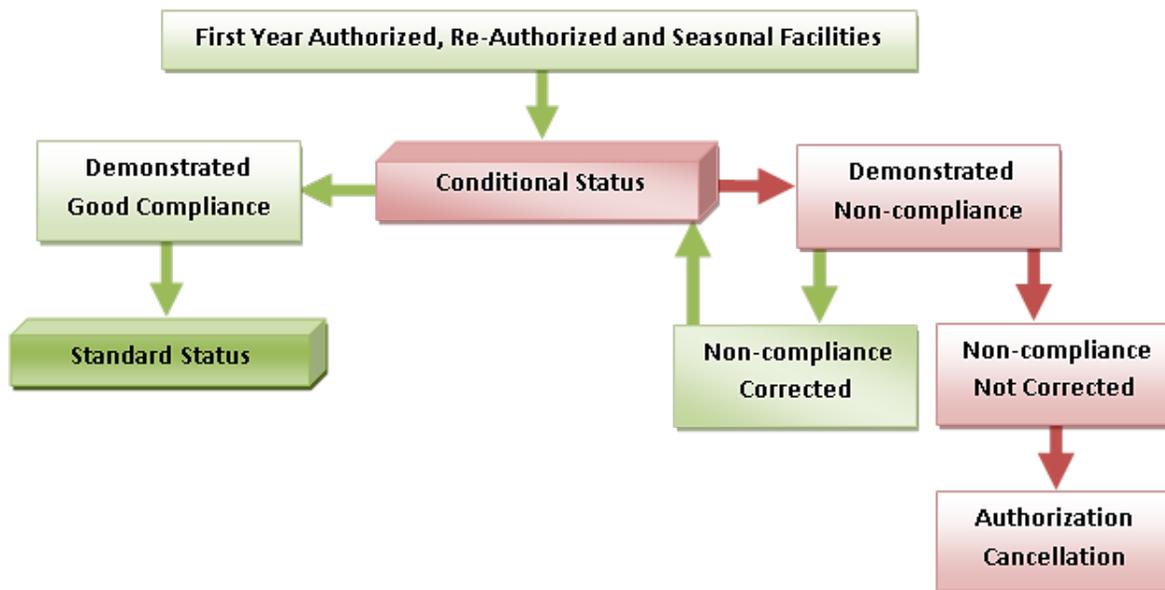
9.2.3 Status Following Suspension

Facilities that are re-Authorized following a suspension will be returned to Conditional Status and continuing until the Authorized Facility demonstrates consistent compliance with GCP, at the discretion of the NPPO. Audit frequency must take place once per quarter.

9.2.4 Seasonal Authorized Facilities

Authorized Facilities whose business is seasonal may remain on Conditional Status indefinitely, at the discretion of the NPPO. Seasonal facilities must have a minimum of one systems audit and one surveillance audit each year. Audits must be carried out at three (3) month intervals during the Authorized Facility's operating season.

Figure 3: Facility Status



9.3 Audit Report

After the conclusion of the audit, the auditor will prepare an audit report and provide it to the Pest Control Manager, including:

- Audit scope and objectives (Systems/ Surveillance);
- Audit details (content of compliance agreement audited, content of Pest Management Plan reviewed, areas of Authorized Facility inspected, pests detected, auditors, date);
- Audit findings, including non-compliance;
- Corrective Action Requests;
- Comments;
- Audit report distribution;
- Audit frequency status; and
- Proposed date for the next audit and any other follow-up activities.

10.0 Non-compliance and Corrective Action

Activities or products found to be in violation of the GCP are considered to be non-compliant. Non-compliance may become apparent as a result of regulatory audits or may be detected through other activities (e.g. import monitoring, audit activities at other Authorized Facilities, etc.). The Authorized Facility is responsible for proposing corrective actions to prevent the non-compliance from recurring. This may require amendment or stricter adherence to the accepted Pest Management Plan. If an Authorized Facility is unable or refuses to make the required correction the compliance agreement will be cancelled.

The causes of non-compliance generally fall into three categories:

1. The Authorized Facility does not comply with the elements of the compliance agreement;
2. Deficiencies identified in the written Pest Management Plan; and/or

3. When the written Pest Management Plan is sufficient, but is not being followed by the Authorized Facility.

The tool to record a Critical or Major non-compliance and its resolution is the Corrective Action Request (CAR) ([Appendix VII](#))

10.1 Corrective Action Request

The Corrective Action Request (CAR) is the means to formally communicate and record critical and major non-compliance and their resolution. A Corrective Action Request may be issued by the NPPO during the audit process or as a result of other regulatory activities.

- The CAR is initiated by the Auditor to describe the non-compliance.
- The CAR is signed by the Auditor.
- The facility proposes a corrective action to the Auditor and a time frame for completion.
- The facility representative signs the CAR.
- The Auditor signifies acceptance of the proposed corrective actions and signs the CAR as indicated.
- When the corrective action is verified as completed by the Auditor, the CAR is closed with a final signature.

An example CAR is found in [Appendix VII](#).

10.2 Classification of Non-compliance

Non-compliance is classified as Critical, Major, or Minor. The classification of non-compliance is based on an evaluation of the associated risk and should take into consideration whether the integrity of the GCP has been compromised. The number and type of non-compliances found determine the subsequent audit frequency.

The “Auditor’s Guide – Classification of Observed Non-compliance” ([Appendix VI](#)) illustrates examples of Critical and Major Non-compliance.

10.3 Critical Non-compliance

A critical non-compliance occurs when audit results indicate that the integrity of the GCP is in jeopardy due to a phytosanitary risk. The Authorized Facility is suspended from the GCP until the corrective action is completed to the satisfaction of the NPPO. (Section 5.5, Suspension of Authorization)

10.4 Major Non-compliance

A major non-compliance occurs when audit results indicate a single incident of non-compliance which, on its own, has no direct impact on the integrity of the GCP, provided that remedial action can be taken within a period defined by the NPPO. Corrective action must be carried out within the time frame specified by the auditor which shall not exceed a maximum of two (2) weeks. If the Authorized Facility is

unable or fails to complete corrective actions in the specified time period, the Authorized Facility is suspended from GCP until the corrective actions are completed to the satisfaction of the NPPO.

10.5 Minor Non-compliance

A minor non-compliance occurs when audit results indicate a non-compliance incident(s) which does not immediately and/or significantly affect the integrity of the phytosanitary status of GCP certified plants. Minor non-compliance does not generate a CAR. Minor non-compliance may be recorded in the audit results with a note that further action may be required if non-compliance is not corrected.

11.0 Suspension of Authorization

The NPPO is responsible for suspending an Authorized Facility's authorization to move plants under the GCP if critical non-compliances are identified. This includes non-compliance identified by means other than an NPPO audit. The duration of the suspension will be determined by the amount of time required by the Authorized Facility to address the CARs and become compliant with the GCP. APHIS and CFIA may consult regarding responses to non-compliances to promote consistency of program implementation.

The NPPO will notify the Authorized Facility in writing when their authorization to move plants with an Export Certification Label or Interfacility Stamp has been suspended.

All unused Export Certification Labels and/or the Interfacility Stamps must be surrendered to the NPPO.

The authorizing NPPO will determine when and how a suspension may be removed, including partial suspension which permits the shipment of plants which meet the requirements of the GCP.

At the minimum, a suspension will remain in effect until the CAR(s) associated with the non-compliance(s) that triggered the suspension have been verified and officially recognized as corrected by the NPPO.

The NPPO may use its discretion to determine when and if a facility may be re-Authorized.

12.0 Cancellation of Compliance Agreement

When the Authorized Facility is unable to achieve compliance, given adequate time and opportunity, the authorization to ship plants under the GCP will be cancelled by the NPPO.

The NPPO will notify the Authorized Facility in writing when their GCP compliance agreement has been cancelled and will collect Export Certification Labels and Interfacility Stamps.

Facilities whose compliance agreement has been cancelled may submit a new application for designation as an Authorized Facility in the GCP. If so, they must complete the entire application and approval process to become reauthorized. The NPPO may refuse to reauthorize facilities, at their discretion.

PART IV – Facility Authorization and Compliance Agreement

1.0 Facility Authorization

A facility must apply to APHIS or CFIA for designation as an Authorized Facility in the GCP. When the authorization process is completed, the facility may certify and ship plants under the GCP. Facilities must either produce plants for certification under the GCP or purchase Certified Plants from one or more Authorized Facilities for export to the United States or Canada.

Applicants with distinct, separate facilities will be required to submit a separate application for each facility. A separate facility is one that is under different management and/or is under an autonomous management structure. The NPPO will make the final determination as to whether an individual facility is separate or part of a single, larger facility.

While a Place of Production may include a broker function as part of their business, any facility where plants are grown is considered to be a Place of Production. Plant Brokers do not grow plants and are not considered a Place of Production.

1.1 Prerequisites for Authorization – all facilities:

To obtain designation as an Authorized Facility for either a Place of Production or as a Plant Broker, the applicant must:

- Own, operate or manage a production facility or brokerage located in the United States or Canada;
- Review and understand the requirements of the GCP and the elements of the applicable Compliance Agreement;
- Complete and submit the appropriate signed “Application to Enter into a Compliance Agreement” ([Appendix III](#));
- Have procedures that meet the requirements of the GCP;
- Participate in the Authorization Audit and demonstrate that all the components of the GCP Compliance Agreement have been implemented at the facility; and
- Complete any corrective action requests identified during the Authorization Audit.

1.2 Additional Prerequisites for Places of Production

- Designate a qualified individual to be the Pest Control Manager;
- Submit a written Pest Management Plan ([Appendix I](#)); and
- Submit a list of eligible plants (botanical names and origin) intended for certification under the GCP.

2.0 Compliance Agreement for Authorized Facilities

After the Authorization Audit is completed and all requested corrections have been resolved, the applicant may enter into a compliance agreement with the NPPO. The compliance agreement contains the specific GCP program elements which must be met by the Authorized Facility in order to ship plants using an Export Certification Label or Interfacility Stamp.

2.1 Compliance Agreement Elements for All Authorized Facilities

The compliance agreement between the Authorized Facility and the NPPO will include;

- all elements applicable to the specific type of facility, as follows;
 - All facilities include the elements of Section 2.1
 - Place of Production also includes the elements in Section 2.2
 - Plant Broker also includes the elements in Section 2.3
- the unique identification number assigned by the NPPO to the Authorized Facility, and
- the following two statements:

“Plants produced in accordance with the United States – Canada Greenhouse-Grown Plant Certification Program may be exported using an Export Certification Label in lieu of a phytosanitary certificate or shipped domestically to another Authorized Facility using an Interfacility Stamp to maintain their certified status.”

“The NPPO may require changes to the compliance agreement to reflect updates to the United States – Canada Greenhouse-Grown Plant Certification Program.”

2.1.2 Designated Staff

Management of the Authorized Facility is responsible for meeting all of the requirements of the GCP. Management may designate qualified personnel or contractors to assist with specific components, such as; pest management, tracking product identity, administration and record keeping, etc. The individuals designated to carry out tasks related to the GCP must have adequate knowledge, skills and training, and must be vested with the authority to ensure the requirements of the GCP are met.

2.1.3 Inventory Control

Authorized Facilities must have a system in place that allows eligible plants to be tracked from the time they enter the facility to the time they are shipped using an Export Certification Label or Interfacility Stamp. There must be sufficient information available to substantiate eligibility and ensure that only eligible plants are certified under the GCP.

2.1.3.1 Control of Non-conforming Plants

Non-conforming plants are all the plants in an Authorized Facility that are not eligible to be shipped using an Export Certification Label or Interfacility Stamp. The Authorized Facility must ensure that non-conforming plants are identified, inventoried and handled in a manner that ensures they are not shipped under the GCP and they do not contaminate / infest or become mixed with plants propagated/shipped under the GCP.

The Authorized Facility will have a system in place to prevent the shipment of non-certified plants using an Export Certification Label or Interfacility Stamp.

2.1.3.2 Separation of ineligible plants

When ineligible and eligible plants of the same taxa are both grown at an authorized facility, there must be a robust system to ensure the plants maintain their identity and remain segregated. This may include physical separation by distance or barriers, depending on the pest risk. The NPPO may require additional safeguarding to be included in the Pest Management Plan depending on the plant taxa.

2.1.4 GCP Certification Documents

Canada and the United States allow the use of Export Certification Labels and Interfacility Stamps to document and maintain the phytosanitary status of GCP Certified Plants in lieu of a phytosanitary certificate. The NPPO determines how Export Certification Labels and Interfacility Stamp are obtained and who may manufacture them. The Authorized Facility must not use an Export Certification Label or Interfacility Stamp to certify plants that do not meet the phytosanitary requirements of the GCP.

Export Certification Labels and Interfacility Stamps used by Authorized Facilities are property of the authorizing NPPO notwithstanding who may have produced or paid for them, and must be surrendered to the NPPO in the event of suspension or cancelation of authorization.

Each Authorized Facility will have its own unique registration number that appears on the Export Certification Labels and Interfacility Stamp, and these must not be shared with other facilities or used for purposes other than the shipment of plants meeting the conditions of the GCP.

The Authorized Facility must have secure storage for its Export Certification Labels and Interfacility Stamp, and ensure access and use by trained, authorized personnel only.

Management at the Authorized Facility must clearly designate an individual to maintain control of the Export Certification Labels and Interfacility Stamp.

The documentation accompanying GCP shipments must list the scientific name of each plant in the consignment. Plants must be identified to genus, and the species/cultivar if required by regulation. In the case of consignments that contain plants in mixed planters, hanging baskets, tropical baskets, etc., the documentation must specifically identify each individual plant contained within these items.

The Authorized Facility must inform the NPPO in the event that Export Certification Labels or Interfacility Stamps are lost.

2.1.4.1 Export Certification Label

The Export Certification Label must be placed on either a copy of the commercial invoice, or a blank sheet of paper listing the genus of the plants, and the species/cultivar if required by regulation, in the shipment and all invoice numbers moving with the Export Certification Label. The document with the attached Export Certification Label replaces the Phytosanitary Certificate normally required for the entry of the plants into the United States or Canada.

The exporting facility must ensure that all plants exported under the GCP satisfy all phytosanitary requirements of Canada and the United States.

Export Certification Labels must not be used for shipments within the country where the Authorized Facility is located.

2.1.4.2 Interfacility Stamp

The Interfacility Stamp is applied to shipping documents for plants shipped domestically to another Authorized Facility in order to retain the certification status of the plants under the GCP. The Interfacility Stamp informs the Authorized Facility purchasing the plants that the plants may be exported using an Export Certification Label. The Interfacility Stamp must be applied to each invoice issued by an Authorized Facility. Shipments with an Interfacility Stamp sent to facilities which are not Authorized Facilities lose their GCP certification status.

Note: If required modules are not in place for all regulated pests present where the Authorized Facility is located, the Authorized Facility may not possess an Interfacility Stamp. (See Part II, [Section 5](#), Regulated Pests)

Information for Authorized Facilities in Canada: *The Interfacility Stamp does not replace a CFIA Domestic Movement Certificate. All plants certified under the GCP must comply with any pest-specific or commodity-specific phytosanitary requirements of the CFIA. Please contact any local CFIA office for details regarding domestic movement requirements and domestic movement certificates.*

Information for Authorized Facilities in the United States: *The Interfacility Stamp does not replace any intrastate or interstate movement requirements. All plants certified under the GCP must also comply with any pest-specific or commodity-specific phytosanitary requirements for domestic movement. Please contact the state departments of agriculture or a local USDA APHIS office for specific domestic movement requirements.*

2.1.5 Records

Records provide evidence that plants propagated and shipped are in conformance with the phytosanitary requirements of the GCP.

Records must include the date that the activity was carried out, the signature of the designated person that carried out the activity, specific information related to the activity, comments, and notes describing any deviations. Records may be in a variety of formats. For example, a copy of the export invoice signed and dated by the person conducting an export shipment inspection could be used as this record.

Records, including shipping documents must be maintained for a minimum of 3 years. (This does not supersede other regulatory requirements, e.g. CITES.)

Examples include:

- Export Certification Labels in stock;
- Export Certification Labels used, including certification documents (records of country of origin, destination, plant taxa, and volume associated with the Export Certification Label used);

- A copy of all invoices marked with the Interfacility Stamp, including origin, destination, plant taxa, and volume of all plants certified.
- List of plants produced at the Authorized Facility
- Inspection of incoming plants
- Inspection of production areas
- Pest detections (e.g. Pest Log)
- Applied pest controls
- Inspection of shipping areas
- Inspection of Certified Plants
- Any other records and procedures sufficient for the NPPO to verify compliance with the requirements of the GCP.

2.1.6 Notifying the NPPO

The Authorized Facility must notify the NPPO immediately when there is the presence, or suspected presence of any condition or situation that may be considered a critical non-compliance at the facility or in association with product purchased or sold, and when there are changes in management or personnel.

Examples (not all inclusive):

- Pest finds of significance (i.e. when uncommon pest damage or symptoms are observed, when a new pest has been detected in an area of production, or when regulated pests are suspected)
- Non-conforming plants shipped using an Export Certification Label or Interfacility Stamp
- Certified plants found to be infested with regulated pest(s)
- Inappropriate use or loss of Export Certification Labels or Interfacility Stamp
- Lack of or loss of Pest Control Manager
- Changes to the Pest Management Plan
- Change of facility management or ownership
- Change of personnel who signed the Compliance Agreement

Until identification of unknown or suspected quarantine pests are confirmed, authorized facilities must not ship the product using an Export Certification Label or Interfacility Stamp.

2.1.7 NPPO Audit

The Pest Control Manager or Plant Broker representative must be present during NPPO audits to assist the auditor and to observe any objective evidence indicating non-compliance with GCP requirements. The Authorized Facility must cooperate with the auditor, allowing access to the Authorized Facility, records, and facility staff. The auditor must be allowed to collect and/or record information, verifying that the export certification procedures used by the Authorized Facility are functioning as intended and plants certified under the GCP meet the phytosanitary requirements.

2.2 Specific Elements for Authorized Facility – Place of Production

The Place of Production must ensure that plants grown under the GCP will be within, under, or sheltered by structures to provide a modified growing condition and/or protection from pests and adverse weather.

Structures may include greenhouses, hoop houses, screen houses, shade houses, or other structures determined by the NPPO that meet the phytosanitary requirements of the GCP. Plants must be grown under conditions that prevent contamination from soil or standing water. Plants must not be produced in growing media which includes soil. Production areas must be kept free of weeds and other unmanaged plants.

2.2.1 Eligible Plants

The Authorized Facility must maintain a list or database of all plant taxa that are in production at the facility. The Authorized Facility must record the source of all plants propagated at the facility. The country / state / province of origin of the plants must be recorded on supporting documents, such as incoming invoices, and must be secured and maintained.

Records must be kept of the date and growth stage of the plants when they enter into production, and when they are shipped from the facility under the GCP to demonstrate that plants being certified have met the importing country requirements. The Authorized Facility must have procedures in place for maintaining product identity within the facility from receiving until shipping.

2.2.2 Pest Control Manager

A Pest Control Manager must be appointed and given the authority and responsibility to develop and implement procedures that meet the requirements of the GCP.

The Pest Control Manager is responsible for:

- Administration, including sourcing eligible plants, maintaining product identity, shipping Certified Plants, using Export Certification Labels and Interfacility Stamps, controlling non-conforming product, and maintaining detailed records that verify compliance with the GCP;
- Immediately notifying the NPPO if any GCP-certified product is received or shipped that does not meet the requirements of the GCP;
- Ensuring that production areas are inspected, per this Part, to verify freedom from regulated pests;
- Immediately notifying the NPPO if a pest of potential regulatory concern is detected;
- Control or eradication of pests discovered during examinations or audits;
- The effective treatment or disposal of products contaminated by plant pests that mitigates the risk of contamination of other products;
- Ensuring that plant identity is maintained and that product not meeting the requirements of the GCP is not shipped under the GCP;
- The development and implementation of a records management and retention system that demonstrates the GCP requirements are being met; and
- Ensuring employees have the expertise and training to carry out their tasks related to the GCP.

2.2.3 Pest Detection and Control

If pests are detected, control measures must be taken immediately to ensure compliance with the phytosanitary requirements of the GCP. The Authorized Facility must have a system for recording

inspections and control procedures, and maintain a Pest Log which records pest identifications and submissions to laboratories, etc. (e.g. initialed invoices, a specific written report, database, etc.).

Different pest control strategies may be employed to meet the phytosanitary requirements. These strategies may include: cultural (weed control, screened vents, general sanitation), biological, or chemical controls.

The presence of regulated pests may result in the suspension of the Authorized Facility until corrective actions are put in place and the pest risk is effectively mitigated.

2.2.4 Pest Management Plan

An Authorized Facility must have a written Pest Management Plan that follows the template in Appendix I (see also Part II, Section 6) describing how consistent compliance with the phytosanitary requirements of the GCP are met. The procedures followed in the Pest Management Plan must be documented for review by the NPPO.

The Authorized Facility must notify their NPPO when the Pest Management Plan is updated. The NPPO will assess the Plan to verify that the phytosanitary requirements continue to be met.

2.2.5 Pest and Plant Specific Modules

When a regulated pest occurs where the Authorized Facility is located, the Authorized Facility must develop modules describing the specific pest mitigation measures that are in place, including procedures for submission of samples and the identification of the facility offering the testing or treatment services. The module(s) must outline any inspection, sampling, testing, treatments, cultural practices or other measures in place to ensure the phytosanitary requirements of the GCP are met. All pest and commodity specific requirements must be met prior to shipping.

The NPPO should be consulted to determine if there is a need for specific module(s) to meet regulated pest requirements.

2.2.6 Incoming Plants

Plants brought into the Authorized Facility must be inspected for pests by authorized staff prior to moving the plants into production areas.

2.2.7 Examination of Production Areas

Intentional and systematic monitoring for pests must be carried out in all production areas of the Authorized Facility at a minimum of 2 week intervals. The examination must be carried out by the Pest Control Manager or other authorized staff member according to the methods, frequency and intensity specified in the Pest Management Plan. In addition to visual inspection, other pest detection methods may be used to provide early warning of pest infestations (e.g. yellow sticky traps, pheromone traps, etc.).

2.2.8 Hardening-off

Hardening-off may only be carried out in areas authorized for this purpose. Plants must be kept under conditions that prevent contamination from soil or standing water. Hardening-off areas must be kept free of weeds and other unmanaged plants. Pest monitoring and pest control must continue as described in the Pest Management Plan.

Plants held in the hardening-off area for more than 28 days may not be considered to be Certified Plants and must not be shipped using an Export Certification Label or Interfacility Stamp.

The details of how plants that are moved outdoors for hardening-off continue to meet the requirements of the GCP must be included in the Pest Management Plan. Specific phytosanitary measures must be implemented in the hardening-off area for control of pests that occur in the area where the Authorized Facility is located (i.e. Japanese beetle, *Phytophthora ramorum*, etc.).

2.2.9 Examination of Shipping Areas and Certified Plants

Certified Plants must be inspected by the Pest Control Manager or other authorized staff member to verify that the plants in the shipment meet the phytosanitary requirements of the United States and Canada.

2.3 Specific Elements for Authorized Facility – Plant Broker

Plant Brokers do not produce, transform or grow plants on site. Plant Brokers that produce, transform or grow plants may only be authorized as a Place of Production.

If a Plant Broker maintains facilities used to store plants, the storage and shipping area must be maintained in a manner that ensures that Certified Plants continue to meet the requirements of the GCP. This includes clearly maintaining the identity of GCP Certified Plants. Certified Plants may not be co-mingled with those originating in non-GCP facilities. Plants must be kept under conditions that prevent contamination from soil or standing water. Holding areas must be kept free of weeds and other unmanaged plants.

2.3.1 Examination of Shipping Areas and Certified Plants

The Plant Broker is responsible for examination of shipping areas and certified plants, reporting pest detections, and implementing pest control measures when pests are detected.

PART V - Appendices

Appendix I Pest Management Plan Template

The following is a standardized arrangement for the development of a Pest Management Plan. Facilities are required to follow the order of the template. The Pest Management Plan may be established or recommended by a provincial or state agency, by industry, or specifically developed by the Authorized Facility. Available technical and procedural documents may be referenced within the Pest Management Plan where appropriate. Written Pest Management Plans which do not follow the format of this template may be returned for resubmission.

1.0 General

The Pest Management Plan must be typewritten, dated and signed by the Pest Control Manager.

The front page must include the name and physical address of the facility, the date, and the name of the person who prepared the document.

The Pest Management Plan must include a numbered amendment record, including a description of the amendment, affected pages, the author and date of the amendment.

2.0 Facility Description

- Number of greenhouses under production;
- A brief description of production, shipping and receiving locations;
- Name of the Pest Control Manager; and
- A map of the facility that shows the receiving area, production areas, staging and shipping area(s).

3.0 Pest Detection (reference: [Part IV, Sections 2.2.3](#))

- Frequency of monitoring for pests (in days), and documentation (Pest Log);
- Pest detection methods used in the greenhouse (e.g. sticky traps, pheromone traps, etc.);
- Actions taken when pest damage or symptoms or new pests are detected; and
- Documentation generated when pests are encountered during monitoring.

4.0 Pest Control (reference: [Part IV, Sections 2.2.3](#))

- Types and timing of pest control measures applied; and
- How pest control treatments are documented.

Note: Authorized Facilities employing an integrated pest management (IPM) program with established threshold levels for specific beneficial organisms may participate in the GCP. The Pest Control Manager must document the IPM program for review by the NPPO and ensure that at the time of shipment the plants meet the phytosanitary requirements of the United States and Canada.

5.0 Pest and Plant Specific Requirements (Modules) (reference: [Part IV, Section 2.5.5](#))

- Specific modules that are in place at the Authorized Facility; and
- Applicable pest mitigation and/or measures implemented for regulated pests.

6.0 Incoming Plants (reference: [Part IV, Section 2.5.6](#))

- Describe how plants brought into the green house operation from outside sources is handled and inspected;
- What actions are taken if pests are found; and
- How inspection results are documented.

7.0 Examination of Production Areas (reference: [Part IV, Section 2.5.7](#))

- Describe methods, frequency, and intensity of inspections by the Pest Control Manager or other authorized staff member; and
- Control measures to be taken to ensure compliance with the phytosanitary requirements of the GCP.

8.0 Hardening-off (reference: [Part IV, Section 2.5.8](#))

- Location of hardening-off area;
- Conditions of hardening-off area;
- Buffer area and control measures for maintaining isolation; and
- Length of time required for hardening-off.

Other systems that meet these phytosanitary criteria may be reviewed by the NPPO. No plants may be held in the hardening-off area for more than 28 days.

9.0 Examination of Shipping Areas and Certified Shipments (reference: [Part IV, Section 2.5.9](#))

- Describe process for handling, staging, and inspection of plants for export;
- Methods used to safeguard plants from infestation or comingling with other plants that has not undergone the inspection process for shipping; and
- How export inspection is documented.

All plants certified by an Authorized Facility must have met the growth and monitoring requirements as detailed in the Pest Management Plan. (reference: [Part II, Section 6](#))

Appendix II Regulated Plant Pests and Pest Control Modules

The following are lists of regulated pests that may trigger the need for a Pest Control Module for host plants. This list may not be all inclusive and is subject to change. Pests of regulatory significance that do not appear on this list may also require a Pest Control Module. The decision to require a module is at the discretion of the NPPO.

When determining if a module is required for specific pests, this appendix is to be used in conjunction with Part II, Section 6.1 Pest Control Modules for Regulated Pests.

Pests new to Canada and/or the continental United States may be considered to be regulated for the purpose of the GCP until their regulatory status is determined. The NPPO should be contacted for confirmation and/or further information.

Entomology

Scientific Name	Common Name
<i>Acrolepiopsis assectella</i>	leek moth
<i>Adelges tsugae</i>	hemlock woolly adelgid
<i>Agrilus planipennis</i>	emerald ash borer
<i>Anastrepha ludens</i> , <i>Anastrepha</i> spp.	Mexican fruit fly
<i>Anoplophora glabripennis</i>	Asian long-horned beetle
<i>Anthonomus grandis</i>	boll weevil
<i>Bactrocera dorsalis</i> , <i>Bactrocera</i> spp.	Oriental fruit fly
<i>Ceratitis capitata</i> , <i>Ceratitis</i> spp.	Mediterranean fruit fly
<i>Coccus viridis</i>	green scale
<i>Diaphorina citri</i>	Asian citrus psyllid
<i>Ditylenchus destructor</i>	potato rot nematode
<i>Epiphyas postvittana</i>	light brown apple moth
<i>Globodera pallida</i>	pale cyst nematode
<i>Globodera rostochiensis</i>	golden nematode
<i>Grapholita molesta</i>	Oriental fruit moth
<i>Hylurgus ligniperda</i>	red-haired pine bark beetle
<i>Lobesia botrana</i>	European grapevine moth
<i>Lymantria dispar</i>	gypsy moth
<i>Meloidogyne chitwoodi</i>	Columbia root knot nematode
<i>Neoconocephalus affinis</i>	rattler conehead katydid
<i>Oncometopia clario</i>	blue sharpshooter
<i>Opogona sacchari</i>	banana moth
<i>Pectinophora gossypiella</i>	pink bollworm
<i>Planococcus minor</i>	passionvine mealybug
<i>Popillia japonica</i>	Japanese beetle
<i>Raoiella indica</i>	red palm mite
<i>Rhagoletis mendax</i>	blueberry maggot

Scientific Name	Common Name
<i>Rhagoletis pomonella</i>	apple maggot
<i>Rhynchophorus ferrugineus</i>	red palm weevil
<i>Rhynchophorus palmarum</i>	South American palm weevil
<i>Scirtothrips dorsalis</i>	chilli thrips, yellow tea thrips
<i>Sirex noctilio</i>	sirex wasp
<i>Solenopsis invicta</i>	imported fire ant
<i>Solenopsis richteri</i>	imported fire ant
<i>Tetropium fuscum</i>	brown spruce longhorn beetle
<i>Tomicus piniperda</i>	pine shoot beetle
<i>Yponomeuta malinellus</i>	apple ermine moth

Pathology

Scientific Name	Common Name
bois noir	grapevine yellows
<i>Candidatus Liberibacter asiaticus</i>	citrus greening
<i>Ceratocystis fagacearum</i>	oak wilt
<i>Elsinoë australis</i>	sweet orange scab
<i>Flavescence dorée</i>	grapevine yellows
<i>Gremmeniella abietina</i>	scleroderris canker
<i>Guignardia citricarpa</i>	citrus black spot
<i>Lachnellula willkommii</i>	European larch canker
<i>Ophiostoma ulmi</i>	Dutch elm disease
<i>Peronospora tabacina</i>	tobacco blue mould
<i>Phomopsis viticola</i>	necrosis of grapevine
<i>Phytophthora ramorum</i>	ramorum blight, sudden oak death
plum pox virus	
<i>Puccinia horiana</i>	chrysanthemum white rust
<i>Ralstonia solanacearum</i> race 3 biovar 2	bacterial wilt
<i>Uromyces transversalis</i>	gladiolus rust
<i>Xanthomonas axonopodis</i>	citrus canker

Other Pests

Scientific Name	Common Name
<i>Arion vulgaris</i>	Spanish slug
<i>Candidula intersecta</i>	wrinkled snail
<i>Ceruella virgata</i>	white snail
<i>Cochlicella acuta</i>	pointed snail
<i>Cornu aspersum</i> (<i>Helix aspersa</i>)	European brown garden snail
<i>Hygromia cinctella</i>	girdled snail
<i>Lissachatina fulica</i> (<i>Achatina fulica</i>)	giant African snail
<i>Microxeromagna lowei</i>	small brown snail

Scientific Name	Common Name
Monacha cantiana	Kentish snail
Monacha cartusiana	Carthusian snail
Monacha syriaca	Hygromiid snail
Ovachlamys fulgens	jumping snail
Prietocella barbara	banded conical snail
Sarasinula plebeia	Caribbean leatherleaf slug
Theba pisana	white snail
Xerolenta obvia	eastern heath snail
Xeropicta spp	small land snail

Additional Plant Pest and Disease Information

[Facilities Handling Plant Pests](#)

[Plant health surveillance](#)

[Official Control - The Federally Recognized State Managed Phytosanitary Program](#)

[Emerging Plant Pests and Diseases](#)

[National Plant Pest Information System](#)

[National Plant Board](#)

[North American Plant Protection Organization's Phytosanitary Alert System](#)

Appendix III Application to Enter into a Compliance Agreement

The following are the minimum elements for designation as an Authorized Facility in the GCP:

Applicant Information - *the applicant is the person who will sign the compliance agreement.*

Facility information - *which may include; Name of Facility/ Company; Physical address; Mailing address; Business phone number; Business fax number; Email address for communication of GCP program information and updates to the facility.*

Owner contact information – *which may include; Owner name; Mailing address; Phone number; Email address.*

Pest Control Manager Information – *which may include; Pest Control Manager name; Phone number; Email address.*

Applicant Declaration

Place of Production

I (*applicant name*) the owner/ operator/ manager of (*facility name*) declare:

- I am the person who will sign a compliance agreement with (*the NPPO*);
- I own, operate or manage a place of production facility located in the (*United States/ Canada*) which grows plants for sale;
- I have reviewed and understood the overview and program requirements of the GCP and the elements of the GCP Compliance Agreement – Place of Production;
- A qualified individual has been designated to be the Pest Control Manager;
- Procedures have been developed and implemented that meet the requirements of the Compliance Agreement - Authorized Facility – Place of Production;
- A written Pest Management Plan has been developed and implemented and a copy is attached to this application;
- I will participate in the Authorization Audit and demonstrate that all the components of the GCP Compliance Agreement have been implemented at the facility; and
- I will complete any corrective action requests identified during the Authorization Audit.

Plant Broker

I (*applicant name*) the owner/ operator/ manager of (*facility name*) declare:

- I am the person who will sign a compliance agreement with (*the NPPO*);
- I own, operate or manage a plant broker facility located in the (*United States/ Canada*) which ships plants certified by other Authorized Facilities;
- I have reviewed and understood the overview and program requirements of the GCP and the elements of the GCP Compliance Agreement – Plant Broker;
- Procedures have been developed and implemented that meet the requirements of the Compliance Agreement - Authorized Facility – Plant Broker;
- I will participate in the Authorization Audit and demonstrate that all the components of the GCP Compliance Agreement have been implemented at the facility; and
- I will complete any corrective action requests identified during the Authorization Audit.

Appendix IV Audit Checklist – Authorized Facility – Place of Production

The following are the elements of an Audit checklist for an Authorized Facility – Place of Production based on [Part IV](#).

Elements of the Compliance Agreement

- GCP shipments leaving the facility are accompanied by an Export Certification Label or an Interfacility Stamp.
- Production areas are greenhouses as defined in glossary.
- Plants are greenhouse-grown under conditions that prevent contamination from soil and standing water.
- Production areas are kept free of weeds and other unmanaged plants.
- Plants are not grown in soil or in growing medium which includes soil.

Eligible Plants

The Authorized Facility:

- Only enters Eligible Plants into the GCP.
- Maintains a list or database of all plants to be certified under the GCP. (genus, species, origin)
- Records the date and the growth stage of the plants when they enter into production.
- Demonstrates that plants are free from soil and/or meet the growing media programs of either the U.S. or Canada as required.
- Demonstrates that plants are greenhouse grown at the facility and have remained at the facility until the importing country requirements were met.
- Records country / state / province of origin of all plants propagated and shipped under the GCP [e.g. propagation at the Authorized Facility, domestic producer or broker (Authorized Facility or non-authorized facility), importation from United States or Canada, importation from another country, etc.], at the time of entry into the Authorized Facility and supporting documents are secured and maintained.
- Has a procedure in place for maintaining product identity from receiving until shipping.
- Can trace back plants to when they were propagated or arrived at the Authorized Facility in order to verify eligibility to enter the GCP.

Pest Control Manager and Staff

- The Pest Control Manager has the authority and responsibility to develop and implement procedures that meet the requirements of the GCP.
- The Pest Control Manager ensures that all Certified Plants produced under the GCP meet the program requirements as described in this document.
- Competent staff carry out tasks related to the GCP with adequate knowledge, skills and training, and are vested with the authority to ensure the requirements of the GCP are met.
- Adequate training is provided to all employees involved in the implementation of the GCP, including a general understanding of the program and specific knowledge related to those components that each employee is responsible for.

Pest Management Plan

- Pest Management Plan describes how compliance with the requirements of the GCP are met.
- The procedures followed in the Pest Management Plan are documented for review.

- The Pest Management Plan includes the elements listed below:

Pest Detection

- Inspects for regulated pests of host plants is conducted.
- Pest Log that records pest identifications, submissions to laboratories, etc. is maintained.
- The NPPO is notified immediately of any pest finds of significance (i.e. uncommon pest damage or symptoms, a new or regulated pest detected in production areas).
- Authorized Facility does not ship product until suspect pests are identified.

Pest Control

- Plant pests are controlled expeditiously.
- Measures are in place to ensure that the risk of transmitting regulated plant pests to non-infested areas is mitigated.
- All Certified Plants meet the requirements of the GCP.

Pest and Plant Specific Requirements (Modules)

- Modules describe the specific risk mitigation measures that are in place and are included in the Pest Management Plan.
- Modules outline inspection, sampling, testing, treatments, cultural practices or other measures in place to ensure that Certified Plants meet the requirements of the GCP.
- All pest and commodity specific requirements are met prior to shipping.
- The names of any laboratories used for testing are included in the written procedures.
- All plants have met growth and monitoring requirements as detailed in the Pest Management Plan.

Inventory Control

- A system is in place to track plants from the time they are entered into or propagated by the facility to the time they are shipped.

Control of non-conforming plants

- A system is in place to identify, inventory and handle non-conforming plants, ensure they do not contaminate / infest or become mixed with Certified Plants, and prevent shipment of non-conforming plants using an Export Certification Label or Interfacility Stamp.

Incoming Plants

- Incoming plants is inspected for pests by authorized staff prior to moving the plants into production areas.
- If pests are detected, control measures are taken to ensure compliance with the requirements of the GCP.
- Details of all examinations, including a description of any pests found and corrective actions taken have been recorded.

Examination of Production Areas

- All plants are regularly inspected by the Pest Control Manager or other authorized staff member according to the Pest Management Plan.
- If pests are detected, control measures are taken to ensure compliance with the requirements of the GCP.

- Details of all examinations, including a description of any pests found and corrective actions taken have been recorded.

Hardening-off

- Hardening-off requirements are implemented for plants moved outdoors according to the Pest Management Plan. (Plants which are moved outdoors for hardening-off continue to be subject to the Pest Management Plan.)
- Hardening-off is done in an authorized outdoor area.
- Plants are kept under conditions that prevent contamination from soil and standing water.
- Hardening-off areas are kept free of weeds and other unmanaged plants.

Examination of Shipping Areas and Certified Plants

- Export shipments are inspected by the Pest Control Manager or other authorized staff member to verify that the plants in the shipment meet the import requirements of Canada and the United States.
- Details of all examinations, including a description of any pests found and corrective actions taken have been recorded.

GCP Certification Documents

- Export Certification Label or Interfacility Stamp are:
 - Only used to certify plants that meet the import requirements of Canada and the United States;
 - Surrendered to the NPPO when authorization is suspended or cancelled;
 - Not shared with other facilities; and
 - Only used for shipments from the Authorized Facility.
- Secure storage is available for Export Certification Label or Interfacility Stamp and only accessed and used by authorized personnel.
- An individual is designated to maintain control and tracking of the use of Export Certification Labels or Interfacility Stamp.
- Authorized individuals are trained in the use of Export Certification Labels or Interfacility Stamps.
- The documentation accompanying GCP shipments does list the scientific name of each plant in the consignment to genus, and the species/cultivar if required by regulation.
- Documentation specifically identifies individual plants contained in consignments of plants in mixed planters, hanging baskets, tropical baskets, etc.
- Records are kept of:
 - Export Certification Labels in stock.
 - Export Certification Labels used, with corresponding certification documents (place of origin, destination, taxa, variety/cultivar and volume).
 - Shipments marked with the Interfacility Stamp, include origin, destination, taxa, variety/cultivar and volume of all plants certified.
- Shipping documents are maintained for a minimum of three (3) years. (Note: *this does not supersede other regulatory requirements, e.g. CITES*).
- The Authorized Facility informs the NPPO in the event that Export Certification Labels or Interfacility Stamps are lost.

Export Certification Label

- A copy of the commercial invoice or a blank sheet of paper listing the plant taxa contained in the shipment is available, and includes the Export Certification Label.
- All invoices in a shipment are referenced on the document to which the Export Certification Label is affixed.
- The Export Certification Labels are only used for exported shipments.
- All ECL are accounted for – care and control.
- The Authorized Facility ensures that all plants exported under the GCP satisfy the phytosanitary requirements of the United States and Canada.

Interfacility Stamp

- The Interfacility Stamp is only applied to shipping documents for domestic shipments, not exports.
- The Interfacility Stamp is applied to each invoice of Certified Plants that are ready for export by an Authorized Facility.
- The Authorized Facility controls and tracks usage of the Interfacility Stamp.
- If required, modules are in place for regulated pests.

Records

- Records include the date that of the activity, signature of designated person, specific information related to the activity, comments, and notes describing any deviations.
- Records, including shipping documents are maintained for a minimum of three (3) years.

Notification to NPPO

- The NPPO is notified immediately when:
 - The presence, or suspected presence, of any condition or situation would be considered a critical non-compliance in the facility, or associated with product purchased or sold by the facility.
 - There are changes to the Pest Management Plan, facility management or ownership, or the person who signed the Compliance Agreement.

NPPO Audit

- The Pest Control Manager is present during NPPO audits.
- The Authorized Facility cooperates with the auditor, including access to the Authorized Facility, providing records and making facility staff available for the auditor to collect and/or record objective evidence.

Appendix V Audit Checklist – Authorized Facility – Plant Broker

The following are the Audit checklist items for an Authorized Facility – Broker based on [Part IV](#).

Elements of the Compliance Agreement

- Eligible plants must be Certified Plants when they enter the authorized plant broker facility and must be accompanied by an Export Certification Label or an Interfacility Stamp.
- The Plant Broker only applies Export Certification Labels and Interfacility Stamps to the paperwork associated with Certified Plants ready for export.
- If a Plant Broker has physical facilities to store plants, the storage and shipping area are maintained in a manner that ensures that Certified Plants continue to meet the same requirements of the GCP as Places of Production.
- Certified Plants are segregated from plants that originate in non-GCP facilities.
- Plants are kept under conditions that prevent contamination from soil and standing water.
- Holding areas are kept free of weeds and other unmanaged plants.

Pest Control Staff

- Designated staff are authorized and qualified to inspect and report the presence of regulated pests to the NPPO.

Pest Management

- A procedure is in place for examination of shipping areas and Certified Plants, reporting pest detections, and implementing pest control measures when pests are detected.

Pest Detection and Control

- If pests are detected, control measures are taken immediately to ensure compliance with the requirements of the GCP.
- The NPPO is notified immediately of any pest finds of significance.
- A system is in place for recording inspections and control procedures, and maintaining a Pest Log that records pest identifications and submissions to laboratories, etc. (e.g. initialed invoices, a specific written report, database, etc.).
- Measures are in place to ensure that the risk of transmitting regulated plant pests to non-infested areas is mitigated.

Inventory Control

- A system is in place to track plants from the time they are entered into or propagated by the facility to the time they are shipped.

Control of non-conforming plants

- A system is in place to identify, inventory and handle non-conforming plants, ensure they do not contaminate / infest or become mixed with Certified Plants, and prevent shipment of non-conforming plants using an Export Certification Label or Interfacility Stamp.

Certified Plants

- Records show that plants were received with an Export Certification Label or Interfacility Stamp indicating that the plants have been greenhouse grown for the required growth and monitoring period at an Authorized Facility and may be shipped as Certified Plants under the GCP.

Examination of Shipping Areas and Certified Plants

- Certified Plants are inspected by an authorized staff member to verify that the plants in the shipment meet the import requirements of Canada and the United States.
- Details of all shipping inspections are recorded.

GCP Certification Documents

- Export Certification Label or Interfacility Stamp are:
 - Only used to certify plants that meet the import requirements of Canada and the United States;
 - Surrendered to the NPPO when authorization is suspended or cancelled;
 - Not shared with other facilities; and
 - Only used for shipments from the Authorized Facility.
- Secure storage is available for Export Certification Label or Interfacility Stamp and only accessed and used by authorized personnel.
- An individual is designated to maintain control and tracking of the use of Export Certification Labels or Interfacility Stamp.
- Authorized individuals are trained in the use of Export Certification Labels or Interfacility Stamps.
- The documentation accompanying GCP shipments does list the scientific name of each plant in the consignment to genus, and the species/cultivar if required by regulation.
- Documentation specifically identifies individual plants contained in consignments of plants in mixed planters, hanging baskets, tropical baskets, etc.
- Records are kept of:
 - Export Certification Labels in stock.
 - Export Certification Labels used, with corresponding certification documents (place of origin, destination, taxa, variety/cultivar and volume).
 - Shipments marked with the Interfacility Stamp, include origin, destination, taxa, variety/cultivar and volume of all plants certified.
- Shipping documents are maintained for a minimum of three (3) years. (Note: *this does not supersede other regulatory requirements, e.g. CITES*).
- The Authorized Facility informs the NPPO in the event that Export Certification Labels or Interfacility Stamps are lost.

Export Certification Label

- A copy of the commercial invoice or a blank sheet of paper listing the plant taxa contained in the shipment is available, and includes the Export Certification Label.
- All invoices in a shipment are referenced on the document to which the Export Certification Label is affixed.
- The Export Certification Labels are only used for exported shipments.
- The Authorized Facility ensures that all plants exported under the GCP satisfy the phytosanitary requirements of the United States and Canada.

Interfacility Stamp

- The Interfacility Stamp is only applied to shipping documents for domestic shipments.
- The Interfacility Stamp is applied to each invoice of Certified Plants that are ready for export by an Authorized Facility.
- If required, modules are in place for regulated pests.

Records

- Records include the date that of the activity, signature of designated person, specific information related to the activity, comments, and notes describing any deviations.
- Records, including shipping documents are maintained for a minimum of three (3) years.

Notification to NPPO

- The NPPO is notified immediately when:
 - The presence, or suspected presence, of any condition or situation would be considered a critical non-compliance in the facility, or associated with product purchased or sold by the facility.
 - There are changes to the facility management or ownership, or the person who signed the Compliance Agreement.

NPPO Audit

- The Facility Manager is present during NPPO audits.
- The Authorized Facility cooperates with the auditor, including access to the Authorized Facility, providing records and making facility staff available for the auditor to collect and/or record objective evidence.

Appendix VI Auditor's Guide – Classification of Observed Non-compliance

The following are examples only and are NOT all-inclusive.

Critical Non-Compliance

- Certified a plant which did not meet the requirements of the GCP.
- Certified a plant which was not Eligible,
- Certified a plant which did not meet Monitoring Period requirements.
- Certified a plant which did not meet module specifications.
- Certified a plant which was infested with a regulated pest.
- Failed to notify NPPO of pest finds of significance (atypical or uncommon pest damage or symptoms observed, new pest detected or regulated pest suspected).
- Failed to control a regulated pest.
- Provided Export Certification Labels or Interfacility Stamps to a person not designated by the facility or for use by a non-Authorized Facility.
- Certified a plant which was not produced by an Authorized Facility.
- Failed to make records available to the NPPO.
- Authorized facility is operating without a Pest Control Manager
- Two or more Major non-compliances detected during a single audit

Major Non-Compliance

- Plants under production or those exported are not practically free from pests.
- Failed to carry out pest management activities specified in their Pest Management Plan.
- PCMS were not implemented as described in the Pest Management Plan.
- Inspection activities are not carried out or recorded as specified in the compliance agreement.
- Records of Export Certification Label or Interfacility Stamp usage are incomplete.
- Failed to report the loss of Export Certification Label/ Interfacility Stamp.
- Certified plants are not identified by botanical name (genus, and the species/cultivar if required by regulation) on shipping documents.
- Records of all plants exported under the GCP are incomplete.
- Unable to demonstrate adequate inventory control, including traceability of plants.
- Failed to notify NPPO when there were changes to;
 - The Pest Management Plan.
 - Facility management or ownership.
 - Pest Control Manager
 - The person who signed the Compliance Agreement.
- Export Certification Labels not affixed in accordance with compliance agreement.

Minor Non-Compliance

- There is insufficiently trained staff to consistently maintain the GCP.
- Records are not completed or maintained in accordance with the compliance agreement.
- Failure to secure Export Certification Labels and/or Interfacility Stamps.
- Staff members are not aware of the applicable GCP requirements related to their duties.
- Pest Management Plan is not up-to-date.

Appendix VII Corrective Action Request

Suggested corrective action request template

U.S.-Canada Greenhouse-Grown Plant Certification Program Corrective Action Request	Number:
Authorized Facility Name	Registration Number
Pest Control Manager	Auditor
Description of non-compliance <input type="checkbox"/> Critical <input type="checkbox"/> Major	
Signature of Auditor Date:	
Proposed Corrective Action	
Date for Completion: Signature of Authorized Facility Representative Date:	
Corrective Action Review Corrective Action Proposal Accepted <input type="checkbox"/>	Signature Date
Corrective Action Verified Complete <input type="checkbox"/> Comments:	
Corrective Action Request Closed Signature of Auditor Date:	