

Questions and Answers – US Nursery Certification Program (USNCP)

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General information about the USNCP

Q1 What is the US Nursery Certification Program (USNCP)?

A1 The USNCP is a phytosanitary certification program for US nurseries that ship nursery stock to Canada. The USNCP uses a Phytosanitary Management System (PSMS) to minimize pest risks so that plants consistently meet Canadian import requirements. The program offers an alternative to traditional phytosanitary certification for shipments to Canada

Q2 How is the USNCP different from traditional phytosanitary certification?

A2 Traditional phytosanitary certification is based primarily on end product inspection by a APHIS or State inspector. Inspectors examine plant material before it is shipped. They issue CFIA Phytosanitary Certificates if the material meets the phytosanitary requirements of the importing country.

The USNCP uses a systems approach, meaning a certified facility CF uses various pest risk management measures throughout its plant production process. These measures include documenting plant production and pest management practices, auditing and reviewing the plant production system, and determining pest prevalence throughout production.

In lieu of traditional Phytosanitary Certificates, USNCP CFs can apply a PCIT Phytosanitary Certification Label Certificate, which is used to certify shipments to the U.S. that meet all the requirements of the program.

Q3 When did the USNCP come into effect?

A3 The USNCP pilot started in 2006 with each state being allowed 4 nurseries to participate.

Q4 Why has APHIS developed the USNCP

A4 The international trade in plants for planting is a high-risk pathway for the spread of plant pests and diseases. The USNCP and CGCP implements the International Plant Protection Convention (IPPC) Standard of using a systems approach to mitigate pest risk. It also meets the guidelines of the North American Plant Protection Organization (NAPPO).

[International Standards for Phytosanitary Measures \(ISPM\) 14](#)
[Regional Standards for Phytosanitary Measures \(RSPM\) 24](#)

Q5 Who is eligible to participate in the USNCP?

A5 Eligible applicants are nurseries, including those that are wholesalers. Brokers who do not operate nursery facility may not participate in the USNCP.

Q6 What are the advantages of participating in the USGCP?

A6 There are a number of advantages to participating in the USNCP:

- Shipping flexibility - Certification labels will be available on site, meaning the CF will no longer have to wait for the inspector to issue individual Phytosanitary Certificates before export.
- Cost - The cost of labels, stamps and audits is expected to be significantly lower than the cost of individual inspections and traditional CFIA Phytosanitary Certificates, especially for larger U.S. exports
- Fewer non-compliances - Implementing the USNCP will result in products that consistently meet Canadian import requirements.
- Quality Product - Facilities that apply PSMS to their production find that they consistently produce higher quality products.

Many US nurseries are already doing most of what is required under these certification programs. However, under the USNCP, facilities must demonstrate compliance by documenting their PSMS and keeping records to verify that the program has been implemented correctly.

Q7 Are additional resources (HR and financial) required to implement the USNCP?

A7 Yes. Additional resources are required for the following reasons:

- Paperwork - Documenting processes and keeping records to verify that procedures have been implemented requires nursery staff to take the time to complete the required paperwork.
- Training - Training staff to implement the certification program may result in increased costs.

Increased expenses - Developing and implementing USNCP Manual requires a significant commitment of resources.

Q8 What plant material is eligible for certification under USNCP

A8 Plant species that are eligible for certification under the USNCP include all plants commonly known and recognized as nursery stock, except those that

have been excluded by the Canadian Food Inspection Agency CFIA [Plants excluded from USNCP](#).

Q9 Are the proof of origin requirements more stringent for facilities certified under the USNCP than for facilities that ship using traditional Phytosanitary Certificates?

A9 No. Proof of origin requirements are the same for all plants destined for export to the U.S. whether they are certified using a USNCP Phytosanitary Certificate or a traditional CFIA Phytosanitary Certificate.

Q10 Where can I get a copy of the USNCP guidelines

A10 Copies of the USNCP guidelines can be obtained for the USDA APHIS office in Riverdale MD, Office of Accreditation (301) 734-5227, or the USDA APHIS regional offices (Western Region 970 494-7500 or Eastern Region 919 855-7300)

USNCP audits

Q11 If facilities are able to certify their own material for export to the Canada, how will APHIS ensure that the material meets CFIA requirements?

A11 APHIS and cooperators will conduct regular audits of all facilities that are approved to ship plant material under the USNCP. The overall objective of these audits is to ensure that the facility is compliant with the USNCP.

Q12 What are systems audits?

A12 Systems audits are annual examinations of an organization's structure, procedures, processes and resources used to implement the USNCP. The objective of a systems audit is to determine whether the procedures and processes described in the USNCP Manual conform to the requirements of the directive, and whether the resources and infrastructure are in place to effectively implement the USNCP.

Q13 What are surveillance audits?

A13 Surveillance audits verify that the facility's plant material, pest management program, records and administrative procedures conform to the USNCP Manual. Surveillance audits evaluate the facility's resources, infrastructure and staff; determine if nursery stock meets USNCP requirements; and verify that USNCP manual procedures are implemented and documented. Surveillance audits are carried out during periods of active plant growth.

Q14 What happens if the audit detects a non-conformance?

A14 Corrective Action Requests (CAR) will be generated for each non-conformance detected in the Certified Facility (CF). CARs will generally require the facility to amend its USNCP Manual. CARs are classified as either critical, major or minor in nature. Consequences of a non-conformance vary depending on its classification.

Q15 When would a non-conformance result in a facility being suspended from the USNCP

A15 A facility may be suspended if activities or products are found to be in contravention of the USNCP.

Information for owners of nurseries

Q16 How do I certify my production facility under the USNCP

A16 To become a Certified Facility (CF), a business must complete the USNCP Application Form for Facilities and send it to UDA APHIS in Riverdale, MD. Eligible applicants are nurseries including those that are also wholesalers. Each one must:

- be located in USA
- complete and sign a USNCP Application Form for Facilities, indicating that the applicant is willing and able to comply with the terms and conditions of the USNCP;
- designate a qualified individual to be the Certification Manager (CM) and/or Crop Protection Manager (CPM)
- develop a USNCP Manual that contains a PSMS and a Pest Management Plan (PMP), and forward a copy of the USNCP Manual to USDA headquarter in Riverdale MD for approval.

Q17 Is participation in the USNCP mandatory?

A17 NO, The USNCP is a voluntary program. However, USDA is moving towards meeting it's obligation under the RSPM 24. At that time, all high risk plants from off-continent sources will be required to originate from pre-approved facilities in its country of origin.

Q18 What if I have more than one facility?

A18 If an applicant owns distinct, separate facilities, each one requires a USNCP Manual and an application form. A separate facility is one that is under different management and/or an autonomous management structure. The

USDA Accreditation Manager will make the final decision on the facility's status.

Q19 Is there a cost to register under the USNCP

A19 No

Q20 What are Certification Managers (CM) and Crop Protection Managers (CPM)?

A20 The facility must designate a CM that is a member of the facility's management team. The CM must have a thorough understanding of the USNCP and of the systems approach to mitigating pest risk. The CM must demonstrate the capability to carry out the requirements of the USNCP, commit to ensuring compliance with the USNCP, and develop and implement a Phytosanitary Management System PSMS.

The CPM must either be employed or contracted by the CF to provide technical pest management services or be the owner or employee of a US business that provides technical pest management services.

The CM or CPM ensures that all pest and commodity specific requirements are met prior to shipping.

Q21 What is a USNCP Manual?

A21 A USNCP Manual describes the procedures implemented by a CF to ensure that plants certified under the USNCP meet all of its requirements as well as the requirements for entry into the U.S. and for domestic movement. The USNCP Manual has two key components: a description of the PSMS and a PMP. A checklist outlining the specific elements that must be contained within the USNCP Manual.

Q22 What is a Phytosanitary Management System (PSMS)?

A22 A PSMS must include procedures relating to sourcing plant material; maintaining product identity; shipping certified material; controlling non-conforming products; conducting internal audits; generating corrective action requests; improving and maintaining the PSMS, the USNCP Manual, and the administrative systems; and maintaining detailed records that verify compliance with the directive.

Q23 What internal audits are required?

A23 The CM must perform, or designate and supervise parties to perform, one internal system audit per year and four surveillance audits per year. The surveillance audits must be conducted at least once during the active growing season and at least once during the shipping season. Records from each audit

must be maintained and within two weeks of an audit, a report must be prepared detailing any non-conformances, corrective actions and opportunities for improvement. Audit reports must be made available to APHIS external audit teams, which will review records from the internal audits as part of the audits by APHIS

Note: Internal audits focus on the systems in place in a CF and are NOT the same as pest scouting or monitoring.

Q24 Why do facilities need to conduct internal audits?

A24 Internal systems are necessary for continuous improvement and audits verify

- the adequacy and effectiveness of the facility's processes in meeting the USNCP requirements;
- whether the required documentation is sufficient, current and readily available to staff;
- whether the PSMS is operating in accordance with the specified requirements, including the performance of all staff identified in the USNCP Manual; and
- the establishment of a corrective action plan to deal with each non-conformance identified.

Internal Surveillance Audits verify

- the effectiveness of the PMP in preventing the introduction or establishment of pests;
- the competency of facility employees in identifying and controlling pests and carrying out duties and responsibilities as outlined in the USNCP Manual;
- that the record keeping aspects of the facility are compliant with the USNCP Manual and sufficient to keep track of the country of origin of plant material, labels, etc.; and
- that actions are taken on outstanding non-conformances and CARs.

Q25 When should internal audits be performed?

A25 APHIS suggests that internal audits be carried out prior to each APHIS/State Department of Agriculture audit and that audits be performed to compliment the certification of plants. The persons performing internal audits must not audit their own work.

Q26 What is a Pest Management Plan (PMP)?

A26 Each facility must develop a PMP that outlines any sampling, testing, treatment and cultural practices, best management practices, or other measures

put in place that ensure end-products are certified according to all phytosanitary requirements. The names and qualifications of each laboratory used for testing must be included in the PMP. The PMP must be readily available for use by employees involved in implementing the USNCP.

If additional pest or commodity specific policy directives apply to the CF or to its products, the facility's USNCP Manual must include Modules, which describe how the additional requirements of the additional policy directive are being met.

Q27 When must modules be included in the USNCP Manual?

A27 Modules are required when a CF produces higher risk plant material. Higher risk plant material may include plants that are hosts to specific pests of concern, plants imported from outside continental North America, plants, or stock plants that are held for longer than a growing season. There is a template that facilities can use to develop there Manual.

Q28 What information will need to be included in the modules?

A28 The modules must outline any sampling, testing, treatments, cultural practices, best management practices, or other measures in place to ensure that the product meets all of the phytosanitary requirements necessary to certify the product. The CM or CPM must ensure that all pest and commodity specific requirements are met prior to shipping. The names and qualifications of any laboratories used for testing must be included in the PMP.

Q29 What about plants at a contract grower's facility that are produced under the PMP of a certified facility?

A29 These plants may be certified, provided they are grown according to the procedures described in the facility's USNCP Manual and approved and audited by APHIS

Q30 What documentation is required for verification of origin?

A30 Many different documents could be used to verify origin provided they contain the appropriate information: Phytosanitary Certificated, invoiced, airway bill, propagation records, bills of lading, etc.

Q31 For how long must verification of origin documents be kept?

A31 Records that pertain to product identity and trace back and trace forward of certified plant material) must be maintained for at least three years. Other records that are required by the USNCP must be maintained for a minimum of three years.

Shipping certified plant material to Canada

Q32 What documentation is required to export plants for planting to the Canada?

A32 A Phytosanitary Certificate.

Q33 Do facilities certified under USNCP need to obtain a Phytosanitary Certificate from APHIS for each shipment to the Canada?

A33 No. In lieu of a traditional Phytosanitary Certificate, USNCP CFs can apply Phytosanitary Certification PCIT Labels, which are used to certify shipments to Canada that meet all the requirements of the program.

Q34 Does Canada have similar nursery certification programs?

A34 Yes. The Canadian Nursery Certification Program (CNCP). The Canadian and American programs are similar. Both countries have designed certification programs that meet international standards, particularly the North American Plant Protection Organization (NAPPO) standard "Integrated Pest Risk Management Measures for the Importation of Plants for Planting into NAPPO Member Countries" ([RSPM 24](#)).

Acronyms

ACO Authorized Certification Official

APHIS Animal Plant and Health Inspection Service

CAR Corrective Action Requests

CF Certified Facilities

CFIA Canadian Food Inspection Agency

CM Certification Manager

CPM Crop Protection Manager

IPPC International Plant Protection Convention

NAPPO North American Plant Protection Organization

PMP Pest Magement Plan

PSMS Phytosanitary Management System

USNCP United States Nursery Certification Program

USDA United States Department of Agriculture

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