United States Nursery Certification Program Pilot

Animal and Plant Health Inspection Service
Plant Protection and Quarantine
USDA APHIS
Plant Protection and Quarantine

STANDARDS
FOR
PHYTOSANITARY MEASURES

REQUIREMENTS FOR THE CERTIFICATION OF NURSERIES
UNDER THE UNITED STATES NURSERY CERTIFICATION
PROGRAM

July 24, 2008

United States Department of Agriculture
Animal and Plant Health Inspection Service
Plant Protection and Quarantine
Riverdale, MD
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REVIEW

Plant Protection and Quarantine Standards for Phytosanitary Measures are subject to periodic review and amendment. The present document is a working document for use during the pilot stage for the implementation of the US Nursery Certification Program (USNCP). It will be finalized at the end of the pilot stage. The finalized Standard will have its first review one year after its completion.

ENDORSEMENT

This Standard is approved by

Name ______________________________ Date ______________________________

AMENDMENT RECORD

Amendments to this Standard will be given a consecutive number, dated and filed with APHIS Headquarters in Riverdale, MD

Please ensure that all amendments are inserted, obsolete pages removed, and the record below is completed.

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I. INTRODUCTION

This standard establishes the requirements for the phytosanitary certification of plants produced in accordance with the United States Nursery Certification Program (USNCP) pilot for export trade in nursery plants to Canada in nursery plants. It also describes the responsibilities of APHIS and industry participants, in addition to describing requirements for approving, auditing and suspending facilities from the program.

International trade in nursery stock is considered a high risk pathway for the spread of plant pests around the world. Traditionally, phytosanitary certification of nursery stock has been based upon a pre-shipment visual inspection of plants. Although visual inspection remains the primary tool of regulatory agencies, it does have limitations as evidenced by several recent introductions of quarantine plant pests believed to have been associated with propagative plant material certified in the country of export.

The 2004 NAPPO concept paper, “Risk and Risk Mitigation Associated with the Importation of Propagative Plant Material into NAPPO Member Countries” discusses the limitations of phytosanitary certification based solely on visual inspections. This document suggests that applying a systems approach to phytosanitary certification offers a very promising alternative for mitigating pest risk. The USNCP pilot uses such a systems approach and is based on the IPPC Standard, “The Use of Integrated Measures in a Systems Approach for Pest Risk Management” (ISPM 14) and also meets the guidelines of the NAPPO Standard, “Integrated Pest Risk Management Measures for the Importation of Plants for Planting into NAPPO Member Countries” (RSPM 24).

The system-based USNCP is designed so any specific phytosanitary requirements associated with particular pests, products and geographical locations can be implemented and administered within the program. The facility’s USNCP Manual must describe how any additional specific phytosanitary requirements are incorporated into and met by the facility’s Phytosanitary Management System.
1. **SCOPE**

This Standard specifies the requirements which must be met by a nursery in order for the nursery to be certified under the US Nursery Certification Program (USNCP) for the exportation of nursery stock to Canada. This standard outlines the requirements of the USNCP including:

- Phytosanitary requirements
- Pest Management requirements
- Requirements for certifying plant material
- Requirements for certified facilities and their staff
- APHIS/State audits and internal facility audits
- USNCP Manual requirements
- Record keeping requirements
- Administrative requirements
- Corrective action requests

**Note:** Participation in the USNCP program is voluntary. For nursery stock grown in non-certified facilities; Federal, State, or County Authorized Certification Officials will carry out regular product inspections before issuing Phytosanitary Certificates.

2. **REFERENCES**


USDA 7 CFR 319.37, 353, and 354
Note: APHIS Import Regulations and the Regulated Plant Pest List may be found at:
http://www.aphis.usda.gov/import_export/plants/plant_imports/index.shtml and

CFIA Import Regulations: Plant Protection Division Policy Directives related to nursery stock including but not limited to:


Note: CFIA Import Regulations may be found under “Policy Directives” at:

3. DEFINITIONS, ABBREVIATIONS AND ACRONYMS

For the purposes of this program, the specified terms, abbreviations and acronyms are defined as follows:

ACO -- Authorized Certification Official (NAPPO RSMP No 5, 2004)

APHIS -- United States Department of Agriculture, Animal and Plant Health Inspection Service, Plant Protection and Quarantine

Audit – A physical or electronic examination of all or part of a facility, which may include examination of documents, records, and plant material and interviews with staff, to ensure conformity with the USNCP Standards and the facility’s USNCP Manual.

CFIA -- Canadian Food Inspection Agency

CAR(s) -- Corrective Action Request(s)

Certification -- Use of a single or any combination of quarantine procedures which will provide for the pest-free movement of commodities (NAPPO, 1991).

Certification Manager (CM) -- A member of the certified facility management team who is responsible and accountable for the overall implementation of the Phytosanitary Management System (PMS) and Pest Management Plan (PMP).

Certified Facility (CF) -- A nursery or other plant production establishment in the United States, whose management has signed an application for designation in the USNCP, has an approved USNCP Manual, has successfully completed an initial facility evaluation and subsequent audits, and is in compliance with the terms and conditions of the USNCP.
**Conditional Status** -- Conditional status is the status of the certified facility when it is first approved for participation in the USNCP. This status is normally maintained for two years.

**External Audit** -- An objective appraisal of the USNCP at a facility that is carried out by an APHIS Audit Team.

**Facility Evaluation** -- For the purposes of this document: The *initial* verification that a facility is capable of competently fulfilling the specifications outlined in its USNCP Manual and that those specifications clearly meet the requirements of the USNCP when used in a practical application OR part of the acceptance process when a facility wishes to be reinstated in the program after a suspension or voluntary withdrawal.

**Growing Cycle** -- The period in which plants grow from one propagative state (e.g. cuttings, tissue culture plantlets, seed, pre-finished plants, etc.) to the next commercially acceptable size for either retail or wholesale trade. For the purpose of this Standard, a growing cycle must be no shorter than 28 days.

**Growing Season** -- The period (or periods) of the year when plants will actively grow in an area, place of production or production site (FAO 2004, ISPM 5). For the purpose of this Standard, a growing season must be no less than 120 days.

**Internal Audit** -- An independent and objective appraisal of the USNCP, conducted under the direction of the Certification Manager.

**IPPC** -- Abbreviation of the 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-Conformance** -- Failure to comply with a requirement of the USNCP Standards.

**Nursery** -- A facility that produces nursery stock.

**Nursery Stock** -- Any plant for planting, propagation or ornamentation including greenhouse, containerized and field grown plants.

**Origin** -- Country, state, county or province where plants were grown.

**Pest** -- Any species, strain or biotype of plant, animal or pathogenic agent injurious to plants or plant products (FAO 2004, ISPM 5).
**Pest Control Advisor (PCA)** -- An individual who is employed by or contracted to a certified facility and who is responsible for the implementation of the procedures and processes described in the pest management component (Pest Management Plan) of the USNCP Manual. May also be referred to as a Pest Control Manager (PCM).

**Pest Control Manager (PCM)** -- An individual who is employed by or contracted to a certified facility and who is responsible for the implementation of the procedures and processes described in the pest management component (Pest Management Plan) of the USNCP Manual. May also be referred to as a Pest Control Advisor (PCA).

**Pest Management** -- The utilization of any procedure or combination of procedures designed to eradicate, suppress or contain pest populations at a level to protect agricultural and forestry resources (NAPPO, 1995).

**Pest Management Plan (PMP)** -- A written description of procedures or processes designed to control, suppress or eradicate pest populations to a level that meets the phytosanitary standard.

**Phytosanitary Certificate** -- An official document, issued by the National Plant Protection Organization of the exporting county to the National Plant Protection Organization of the importing country. It attests that the plants or plant products covered by the certificate have been inspected according to appropriate procedures and are considered to be free from regulated pests and practically free from other injurious pests, and that they are considered to conform to the current phytosanitary requirements of the importing country.

**Phytosanitary Management System (PMS)** -- A systems approach, including pest management and record retention, used to direct and control an organization to consistently meet all the requirements of the USNCP.

**Plant** -- Living plants and parts thereof, intended for planting, including a part of a plant.

**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).

**Procedure** -- A written description of the steps used to carry out an activity or process. A procedure also indicates the purpose and scope of the activity and identifies who has the authority to perform the activity. Any record forms associated with the activity must be referenced or attached to the procedure. Definitions may be included, if appropriate.

**Quarantine Pest** -- A pest of potential economic importance to the area endangered thereby and not yet present there, or present but not widely distributed and being officially controlled (FAO 2004, ISPM 5).
**Record** -- A piece of evidence or information constituting an account of something which has occurred. For the purpose of this Standard, a record is used to verify continuous compliance with the USNCP Standard and to demonstrate procedures have been carried out as specified in the USNCP Manual. Records must include the date the activity was carried out, the signature of the designated person who carried out the activity, specific information related to the activity, and notes describing any deviation from described procedures.

**Regulated Non-quarantine Pest** -- A non-quarantine pest whose presence in plants for planting affects the intended use of those plants with an economically unacceptable impact and which is therefore regulated within the territory of the importing contracting party (FAO 2004, ISPM 5).

**Standard Status** -- Standard status is reserved for certified facilities which consistently meet the requirements of the USNCP.

**Surveillance Audit** -- Continuous monitoring and verification of the status of an entity and analysis of records to ensure that specified requirements are being fulfilled. For the purposes of this document this definition is taken to mean: a verification that the status of the nursery stock and records conforms to the USNCP Manual.

**Suspended Status** -- Facilities in suspended status are not allowed to ship material under the USNCP. The facility will be removed from the registry of approved facilities until corrective actions are completed to the satisfaction of APHIS.

**Systems Approach** -- The integration of different pest risk management measures, at least two of which act independently, and which cumulatively achieve the appropriate level of phytosanitary protection (FAO 2002, ISPM 14).

**Systems Audit** -- A systematic examination of the organizational structure, procedures, processes and resources used in implementing the USNCP within the certified production facility. The objective of a systems audit inspection is to review the entire phytosanitary management system and determine whether all the required procedures have been identified in the USNCP Manual and that those continue to be sufficient to meet the requirements of the USNCP.

**United States** -- The term *United States* means the States, District of Columbia, American Samoa, Guam, the Northern Mariana Islands, Puerto Rico, and the Virgin Islands of the United States

**USDA** -- United States Department of Agriculture, Animal and Plant Health Inspection Service

**USNCP** -- United States Nursery Certification Program
**USNCP Manual** -- Document produced by each participating nursery that describes the export production policy and system of the nursery facility.

Other definitions, abbreviations and acronyms as contained in the NAPPO Compendium of Phytosanitary Terms (NAPPO, 2004) and the FAO Glossary of Phytosanitary Terms (2004) are incorporated by this reference as part of this Standard.

### 1.0 GENERAL REQUIREMENTS

#### 1.1 Legislative Authority

Plant Protection Act of 2000

USDA 7 CFR 353 and 354

#### 1.2 Fees

Audits, inspections, certification of nurseries, certification of nursery stock, and issuance of Phytosanitary Certificates are subject to cost recovery according to 7 CFR and applicable State user fee regulations.

#### 1.3 Regulated Pests

This standard regulates all quarantine and regulated non-quarantine pests of Canada and the United States.

A list of Canada’s Regulated Pests can be found in Appendix 1. A current list may also be obtained by consulting the Canadian Food Inspection Agency (CFIA) website at: http://www.inspection.gc.ca/english/plaveg/protect/listpespare.shtml.

A partial list of regulated pests that the United States Department of Agriculture (USDA) considers to be of quarantine significance can be found on line at: http://www.aphis.usda.gov/import_export/plants/plant_imports/downloads/RegulatedPestList.pdf.

Some provinces in Canada have specific requirements for plant pests. It is the responsibility of participating nurseries to ensure that shipments of nursery stock meet the specific requirements of the destination province.

#### 1.4 Regulated Commodities

All nursery stock, except seed.
2.0 PHYTOSANITARY REQUIREMENTS

The certified facility must ensure that the plant material certified under the USNCP meets all the requirements of this phytosanitary standard, meets the requirements of other government agencies, and is accompanied by appropriate documentation. The facility’s USNCP Manual must identify mechanisms to ensure that only eligible plant material is exported under the USNCP. The certified facility is obligated to request the origin of plant material obtained from suppliers and must maintain records which verify the origin of all plant material certified under the USNCP. In addition, all plant material must be held and examined by designated facility staff before it can be integrated into any of the certified facility’s production or shipping areas. Product identity must be maintained once it is integrated into the facility.

A Phytosanitary Certificate must be issued by an APHIS designated ACO for each shipment of plant material to be exported to Canada under the USNCP, which will certify compliance with Canadian import requirements. A phytosanitary certificate will be issued based on the certified facility’s compliance to this Standard, without the requirement of a traditional export inspection by the certifying ACO.

After a facility has been in the USNCP for one year, the facility will be eligible to use the online Phytosanitary Certificate Issuance and Tracking (PCIT) system to apply for and issue their own certificates at the facility for USNCP eligible commodities. The USNCP phytosanitary certificate from PCIT will be printed on regular (non-security) paper.

2.1 Phytosanitary Standard

All plant material certified under the USNCP must meet the following phytosanitary standard:

- Freedom from all quarantine and regulated non-quarantine pests to Canada and the US
- Practical freedom from non-regulated plant pests
- Compliance with any pest-specific or commodity-specific phytosanitary requirements of the CFIA and/or USDA
- Compliance with pertinent federal regulations for certified facilities located in areas with regulated pests
- Compliance with CFIA origin requirements

2.2 Sourcing Plant Material

The USNCP is a program targeted at the production of plant material for export to Canada that meets the phytosanitary standard defined by freedom from both quarantine and regulated plant pests and practical freedom from all non-regulated plant pests. The certified facility must ensure that all plant material that is brought onto the premises is held and inspected by designated nursery staff before it is introduced into any of the certified facility’s production
or shipping areas. Only plant material that meets the phytosanitary standard may be moved to other areas of the certified facility.

Material sourced from another USNCP certified nursery must undergo receiving and shipping inspections, like any material entering or leaving the facility, but can be exported to Canada without any holding period.

A certified facility may source from other uncertified facilities, provided it meets all requirements for federally regulated pests. Material sourced from non-certified U.S. facilities must be handled within the specifications of the certified facility’s USNCP Manual. The material must undergo a receiving inspection. Once the material has been deemed free of quarantine pests and practically free of all non-regulated pests, the material must be incorporated into the inventory of the nursery. The certified nursery must hold the product for at least 28 days and subject it to at least one audit (external or internal) prior to export to Canada. For material from outside the United States, the material must meet all federal, state, and county import requirements and meet the requirements for propagative origin outlined in Section 2.4.

The facility must specify within its USNCP Manual:

- Methods of determining and maintaining records of the origin of the sourced material
- Examination processes sufficient to preclude the transmission of pests and diseases
- Methods to ensure only eligible plant material is exported under the USNCP
- Methods for maintaining the identity of plant material once it is integrated into the inventory of the facility
- Methods for identifying compliance with any pest-specific, origin-specific, or commodity-specific phytosanitary requirements of the CFIA and/or USDA

2.3 Eligible Plant Taxa

Plant taxa eligible for certification under the USNCP include those plants commonly known and recognized as nursery stock, except those that have been excluded by CFIA or APHIS, as outlined below:

Appendix 2 lists the plant taxa that are not eligible for certification under the USNCP:
Part A of Appendix 2 states that plant material imported into the United States in growing media from a country other than Canada is not eligible for certification under the USNCP and is prohibited entry into Canada regardless of the length of time the material is grown in the United States. The only exception is plant material which is sourced from facilities which are approved under both the USDA Growing Media Program and the Canadian Growing Media Program.

Part B of Appendix 2 lists plant genera and species which are never eligible to be certified under the USNCP to any province of Canada. Certain plants listed in Part B can be inspected and certified under separate inspection activities by Federal, State or County ACOs for export to Canada. Local APHIS and State or County Department of Agriculture offices will be able to advise exporters of the certification and inspection requirements for these specific plant taxa.

Part C of Appendix 2 lists plant genera which are never eligible for certification under the USNCP when destined to specific listed provinces of Canada. Plants on this list destined to other provinces of Canada may be eligible for certification under the USNCP.

Part D of Appendix 2 includes plant genera and/or species which are regulated as protected plants under the Convention on International Trade in Wild Flora and Fauna (CITES) and/or the Endangered Species Act (ESA) and are not eligible for certification under this program. Local APHIS offices can advise exporters of the certification and inspection requirements for these specific plant genera and species.

Part E of Appendix 2 lists plant genera which are not eligible for certification under the USNCP when originating from specific areas of the United States. However, the listed genera may be eligible for export to Canada under separate phytosanitary inspection and certification by Federal, State or County ACOs.

Part F of Appendix 2 lists plant genera or species not eligible for certification under the USNCP when originating from countries other than the United States or Canada. These plants are prohibited and may never be exported to Canada.

2.4 Propagative Origin

- All plant material shipped under USNCP must be of United States or Canadian origin. The facility must supply a list of all its sources of propagative plant material acquired by the facility.
Those plants not appearing on Part C of Appendix 2 imported to the United States from countries other than Canada must meet US import requirements, be grown at the certified facility for a period of time that is at least one growing cycle for greenhouse grown plants and one growing season for field and container grown plants, and be subject to at least one audit (external or internal) to be considered of US origin.

- Plant material imported into United States under the US Growing Media Program (GMP) (plants rooted in pre-approved non-soil media) is prohibited from entering Canada regardless of the length of time grown in US. Subsequent generations of plants originating from the GMP mother plants are eligible under the USNCP. The only exception applies to plant material that originates from facilities approved under both the CFIA and USDA Growing Media Programs. Contact your local APHIS office for a list of those facilities. Local APHIS offices can provide exporters with a list of those facilities.

- Plant material imported to the US from countries from which the plants would be considered a prohibited material to Canada are prohibited from export under the US Nursery Certification Program, see Part C of Appendix 2.

- Certified facilities located in areas infested with regulated pests are governed by pertinent local and federal regulations. Local APHIS and State or County ACOs will be able to advise exporters of the need to meet local and federal regulations for specific regulated pests.

- Plant material that meets Canadian import requirements, but cannot be certified under the USNCP may be certified under go traditional phytosanitary inspection by Federal, State or County ACOs for export to Canada under a Federal Phytosanitary Certificate.

3.0 FACILITY CERTIFICATION AND AUDIT REQUIREMENTS

3.1 Applying for Certification

3.1.1 Eligible Applicants

Eligible applicants are nurseries and greenhouses. To become certified under USNCP, the facility (or facility management) must:

- Be located in United States;

- Have completed, signed and forward to the Regional Office of APHIS an Application for Designation in the US Nursery Certification Program
(Appendix 3) indicating that the applicant is willing and able to comply with the terms and conditions of the USNCP;

- Submit, within 120 days of submitting their application, an USNCP Manual clearly stating how they will meet this Standard; identifying the pest management strategy for the operation; and containing all the elements outlined in Section 5.0. The facility may apply for an extension of 60 days if they are unable to complete their manual in time.

- Designate qualified individuals to be the Certification Manager and the Pest Control Manager (see Appendix 4 for criteria).

- Allow APHIS, State, and/or County officials to conduct an initial Facility Evaluation of the nursery system;

When these steps have been successfully completed, the facility will be formally certified by APHIS. The National Accreditation Manager will assign an identification number to each facility certified under USNCP. The APHIS State Plant Health Director of any state with certified facilities will maintain a list of certified facilities in that state. Upon notification from the National Accreditation Manager, newly certified facilities will be added to that list.

During the period of time that it takes to certify the facility (i.e. while the review of the USNCP Manual and the initial Facility Evaluation are being completed), nursery stock from that facility must be certified for export to Canada through regular Federal, State or County Agriculture Department phytosanitary product inspections conducted by ACOs.

**NOTE:** In situations where an applicant has distinct separate facilities, each facility will require a separate USNCP Manual and a separate application form. A separate facility is one that is under different management and/or is under an autonomous management structure.

### 3.1.1.1 U.S. Nursery Certification Program Pilot Participant Selection Criteria

During the pilot phase of the U.S. Nursery Certification Program (USNCP), each state will initially be allowed to have 4 nurseries participate in the program. The nurseries will be nominated by the industry organization of the state, but the selection of participants must adhere to following criteria:

1) The nursery must have shipped to Canada during the past year, is shipping to Canada during the current year, and has plans to ship to Canada during the next two shipping years.

2) The nursery must commit to completing their draft USNCP manual within 4 months of submitting their application to APHIS. Upon written request to USDA/APHIS, the facility will be allowed one extension of 60 days. If the nursery is unable to draft their manual within this timeframe, they will be excluded from participation. Written notice of exclusion from the
USNCP will be provided by the National Accreditation Manager to the nursery, state nursery association, and the state/county department of agriculture.

3) Nurseries will be selected by the representative industry organization of the state, but industry must ensure that the selected nurseries accurately reflect the composition of the nursery industry of the state in terms of size and complexity of operation and should coordinate with the State and County Department of Agriculture in their selections.

4) Nurseries must understand that participation in the USNCP requires commitment to the lengthy approval process and then required record keeping and audits once approved.

5) In the near future, nurseries will be required to use PCIT to participate in the USNCP.

If more than 4 nurseries are nominated that meet the above criteria, selection of the participants will be done by a random drawing overseen by the state plant regulatory official (SPRO).

3.1.2 Document Review

APHIS will review the Application for Designation form to ensure that the facility is eligible for approval under the USNCP and that the application is complete and signed. APHIS will also review the USNCP Manual to ensure that it contains all the required elements outlined in Section 5 and that it is sufficient to meet the requirements of this Standard (see Appendix 5 and Addendum 1). APHIS may require the facility to revise or rewrite their USNCP Manual prior to proceeding to the next step in the approval process. Once APHIS has approved the USNCP Manual, the facility will move to the next phase of the process, the Facility Evaluation.

3.1.3 Facility Evaluation

Once the application and the USNCP Manual are approved by APHIS, an audit team will carry out a Facility Evaluation inspection (see Addendum 2). The purpose of the Facility Evaluation is to determine whether the facility has the infrastructure and staff in place to successfully implement the phytosanitary management system outlined in its USNCP Manual and meet the requirements of the USNCP. A written audit report summarizing the findings of the Facility Evaluation will be prepared by the lead auditor within 21 days of the Facility Evaluation.

3.1.4 Certification

Once APHIS has approved the facility’s USNCP Manual and verified, through the facility evaluation, that the facility is able to implement all the procedures described in their manual, the facility is considered a Certified Facility (CF). Each certified facility approved under the USNCP is assigned a unique identification number by APHIS at the time of registration.
3.2 Audits

APHIS will conduct regular systems and surveillance audits of all facilities that are approved to ship plant material under the USNCP and will prepare audit reports that summarize the audit findings. Appendix 6 describes the audit team and how audits are conducted. An audit checklist may be found in Addendum 3. Additional guidance for audits can be found in Addendums 4-7.

During the initial year of the pilot program, a minimum of three (3) surveillance audits and one complete systems audit must be conducted by APHIS and State or County Department of Agriculture officials concurrently with the pest control manager (or advisor). After the initial year of the pilot program, the audits will be conducted in accordance with the frequencies specified in Sections 3.5.1 and 3.5.2.

The overall objective of these audits is to ensure that the certified facility is compliant with the USNCP Standard and that all nursery stock certified under the USNCP consistently meets the phytosanitary standards and eligibility requirements of the program. More specifically the goals are to:

- Verify that the facility is in compliance with the facility’s USNCP Manual, the USNCP Standards for Phytosanitary Measures, the USDA Plant Protection Act and Regulations, CFIA import requirements for nursery stock, and US domestic movement requirements for nursery stock
- Evaluate whether the facility is implementing their Phytosanitary Management System (PMS) as described in their USNCP Manual
- Evaluate whether the facility is implementing their Pest Management Plan (PMP) as described in their USNCP Manual
- Facilitate continual improvement and updating of the facility’s Phytosanitary Management System and USNCP Manual
- Identify any deficiencies in the facility’s Phytosanitary Management System

3.2.1 Systems Audits

Systems Audits are a systematic examination, generally on an annual basis, of the organizational structure, procedures, processes, and resources used in implementing the USNCP within the certified facility. The objective of a systems audit is to determine whether these particular components of the program comply with the facility’s system as described in the USNCP Manual and to determine whether the components of the USNCP Manual are implemented effectively to achieve the objectives of the USNCP.
3.2.2 Surveillance Audits

Surveillance Audits are a continual monitoring and verification of the status of the certified facility’s plant material, records, and administrative procedures to ensure conformity with the facility’s USNCP Manual. Surveillance Audits evaluate whether the facility has the resources, infrastructure, and staff in place to successfully implement the procedures outlined in the USNCP Manual. Surveillance audits also verify that those procedures described in the USNCP Manual are implemented and documented and all certified nursery stock meets the requirements of the USNCP.

Surveillance audits verify the effectiveness of pest management operations in controlling the introduction or establishment of pests, competency of nursery employees in identifying and controlling pests and record keeping aspects of the nursery. At least one surveillance audit should be carried out during a period of active plant growth.

3.3 Corrective Action Requests (CARs)

Corrective Action Requests (CARs) must be generated for each non-conformance detected in the certified facility (Appendix 8). Corrective action requests will generally require the certified facility to make changes to the phytosanitary management system and amendments to their USNCP Manual.

All non-conformances must be classified on the corrective action request as being critical, major or minor in nature. Corrective action associated with a critical or a major non-conformance must be undertaken immediately. A partial list of non-conformances is in Appendix 7.

Each corrective action request will be accompanied by an action plan that includes a detailed description of the measures that the certified facility will implement to prevent recurrences of the non-conformance and a time frame for completing the corrective actions. Failure to follow the action plan may result in suspension of the facility from the USNCP.

3.4 Non-Conformances

Activities or products that are found to be in contravention of this Standard are considered non-conformances. Non-conformances can be detected during APHIS audit inspections, internal audits, regular examinations of plant material, or import inspections of plant material by CFIA. These shall be classified as critical, major, or minor with a specified period for corrective action defined for each type.

The number and type of non-conformances found determine the status of the facility and the subsequent auditing frequency. Guidelines describing the classification of non-conformances can be found in Appendix 7. However, the actual classification of non-conformances is based
on an evaluation of the associated risk and whether the integrity of the certification program has been compromised.

**3.4.1 Critical Non-Conformances**

Audit findings that indicate that the integrity of the USNCP at the certified production facility is in jeopardy, are considered to be critical non-conformances. The facility must be *immediately suspended* from the USNCP if any critical non-conformances are found (Section 3.5.3). Appendix 7 provides examples of some critical non-conformances.

**3.4.2 Major Non-Conformances**

Major Non-Conformances are isolated incidents of non-conformance, which have no direct impact on the integrity of the certified product. Corrective actions must be carried out to the satisfaction of APHIS within a specified period of time. The required corrective actions will generally require a change to the USNCP manual and will include measures to prevent recurrence. Appendix 7 provides examples of some major non-conformances.

If more than two major non-conformances are detected during an audit, or if the facility fails to carry out the required corrective actions within the specified time period, the facility must be *immediately suspended* from the USNCP (Section 3.5.3).

**3.4.3 Minor Non-Conformance**

Minor non-conformances are isolated incidents, which do not immediately and/or significantly affect the integrity of the program or the certified product. Appendix 7 provides examples of some minor non-conformances.

If more than three (3) minor non-conformances are detected in any one audit this is considered equivalent to one major non-conformance. Corrective actions must be undertaken by the facility before the next scheduled audit, or within the time limit specified by APHIS. Any non-conformance must be accompanied by an action plan. Failure to follow the action plan may result in the suspension of facility from the USNCP.

**3.5 Observations/Opportunities for Improvement**

Observations are points or practices which could be used to improve the facility’s USNCP Manual and phytosanitary management system. Observations may be used to highlight, suggest or reinforce particular practices. The recording of observations is optional, and may use the form in Appendix 9. Observations may be noted during either internal or external audits, or when improvements to acceptable current practices are identified. If observations are noted between external audits, the observations must be retained with the facility’s records and must be presented to APHIS for review at the time of the next external audit.
3.6 Facility Status and Frequency of Audits

The frequency of APHIS audits is determined by the status of the certified production facility, which is determined primarily by the results of previous APHIS audits. During the initial year of participation, a minimum of four surveillance audits and one systems audit must be conducted by APHIS. After the initial year of participation, the audits will be conducted according to the frequencies specified in Sections 3.5.1 and 3.5.2.

3.6.1 Conditional Status

Conditional status is normally maintained for two growing seasons when the facility is first approved for participation in the USNCP. Facilities that operate under low pest risk conditions may be placed on Standard status following one growing season of acceptable compliance with the program. This will be done at the discretion of APHIS in consultation with the State or County Department of Agriculture responsible for overseeing the USNCP facilities as part of their area of responsibility.

A facility may remain at Conditional Status for a maximum of two consecutive years. If it has not achieved Standard Status by the end of this period, the facility will be suspended (Section 3.5.3).

During conditional status, APHIS will conduct a minimum of one systems audit and three surveillance audits annually. During the initial year of the pilot program, audits will be conducted at an increased frequency, see Section 3.5.

3.6.2 Standard Status

Standard status is reserved for facilities which consistently meet the requirements of the USNCP. Facility’s which have consistently met the requirements of the USNCP during the probationary period may be changed to standard status, at the discretion of APHIS.

Facilities at Standard Status may be placed at Conditional Status, as an alternative to Suspension, depending on the number and type non-conformances identified, or as a result of making significant modifications to their USNCP Manual.

During standard status, APHIS will conduct a minimum of one systems audit and two surveillance audits annually. Audits will be conducted at a frequency determined by the Regional Program Officer.

3.6.3 Suspended Status

Suspended facilities are not allowed to ship material under the USNCP. APHIS must remove the facility from the registry of approved facilities until corrective actions are completed. If a quarantine pest of either the US or Canada is found at a certified facility, the facility will be
immediately suspended from the USNCP and all shipments from that facility must be stopped. APHIS and the State and County Departments of Agriculture will not issue any phytosanitary certificates except after APHIS or State or County Department of Agriculture conduct phytosanitary inspections of plant material prior to shipping.

The facility may re-apply for certification in the program after the Phytosanitary Management System and USNCP Manual have been reviewed and restructured to address all previous non-conformities, following the process outlined in Section 3.1.

4.0 MANAGEMENT AND STAFF REQUIREMENTS

The facility management must be committed to ensuring that the procedures described in the USNCP Manual are effective for ensuring the integrity of certified plant material and that all procedures described therein are fully implemented. In addition, the certified facility must have sufficient, capable staff in place to permit it to successfully fulfil the requirements of the USNCP.

4.1 Management Responsibility

The facility management is responsible for the development and maintenance of a phytosanitary management system that precludes the introduction or transmission of quarantine pests to or from the nursery. The administration of that system shall be carried out and verified by the pest control manager.

Management is responsible for affording APHIS, State and/or County staff full co-operation for the purposes of carrying out facility evaluations, audits, examinations of records and documents, sample collection, product inspections or interviews of staff. Management is also responsible for the implementation of required corrective actions. Facility management must appoint a Certification Manager and a Pest Control Manager (or Pest Control Advisor) who meet the requirements listed in Appendix 4. The certification manager may also be the pest control manager as long as the individual satisfies the requirements of both positions. The management of the certified facility must also ensure that the facility has sufficient capable, trained staff employed to carry out the requirements of this Standard.

4.2 Certification Manager (CM)

The facility must designate a Certification Manager (CM) that is a member of the management team of the facility. The certification manager must have a thorough understanding of the USNCP, demonstrate the capability to carry out the requirements described in this directive and be committed to ensuring compliance with the USNCP by implementing the pest management plan and record retention program of the facility. Addendum 1 lists the qualifications required of certification managers.
The Certification Manager must be invested with the authority and responsibility to develop and implement a phytosanitary management system that meets the requirements of the USNCP. The administration of the phytosanitary management system must be carried out and verified by the certification manager. The Certification Manager must ensure employees conducting pest management or eradication activities have expertise in performing those tasks and are adequately trained. The Certification Manager is responsible for the development and maintenance of a record management and retention program. The Certification Manager may designate qualified personnel or contractors to assist in developing and implementing components of the phytosanitary management system such as: pest management, record keeping, administration and internal audits.

The certified facility must have a qualified alternate who can replace the Certification Manager when that person is absent. Any facility that does not name a qualified alternate, or does not put an APHIS approved contingency plan into place at the time of departure or absence of the Certification Manager will be suspended from the program.

4.3 Pest Control Manager (PCM) also known as Pest Control Advisor (PCA)

The Pest Control Manager (also known as the Pest Control Advisor) must be invested with the authority and responsibility to develop and implement a pest management plan (PMP) that meets the requirements of the USNCP, and must report to the Certification Manager. The facility must have a contingency plan in place that ensures that the responsibilities of the Pest Control Manager (or Advisor) are met, even in his/her absence. Any facility that does not name a qualified alternate, or that does not implement an APHIS approved contingency plan at the time of departure or absence of the Pest Control Manager, will be suspended from the program.

The Pest Control Manager must either be employed or contracted by the certified facility to provide technical pest management services as specified in a contractual agreement between the facility and the employee; or be the owner or employee of a business the provides technical pest management services as specified in a contractual agreement between the certified facility and the business. The individual designated as the Pest Control Manager must meet the qualifications outlined in Appendix 4.

The Pest Control Manager must determine whether plant material meets the phytosanitary requirements of the USNCP and the requirements as stated in the certified facility’s USNCP Manual.

The PCM is responsible for:

- Immediately notifying the Certification Manager if the product is contaminated, or suspected to be contaminated with a regulated pest; and

- Immediately notifying APHIS and the State or County Departments of Agriculture
regarding the presence of a quarantine pest in the certified facility or on product purchased or sold by the certified facility; and

- Controlling or eradicating regulated and non-regulated pests discovered during examinations or audits; and

- Effectively treating or disposing of products contaminated with regulated and non-regulated plant pests in a manner that mitigates the risk of contamination of other products as specified in the USNCP Manual; and

- Maintaining detailed records that verify compliance with the USNCP Manual and phytosanitary requirements of this Standard, including non-conformances, corrective actions, audits and follow-up examinations; and

- Establishing a corrective action plan to deal with identified non-conformances. Corrective actions must provide detailed instructions to prevent recurrences of the non-conformances.

4.4 Facility Staff

In the USNCP Manual, the facility must identify all employees involved in implementing the facility’s phytosanitary management system, provide a description of their duties, and contact information.

As part of the internal audit process, the certified facility must complete regular assessments of the staff positions named in the USNCP Manual, and document the results and recommendations for improvements. Observations and corrective actions must be recorded, initialed, and dated.

4.5 Training of Facility Staff

The certified facility must provide all employees involved in implementing the USNCP with a general understanding of the facility’s phytosanitary management system and specific knowledge related to those components for which each employee has responsibility.

A training program that provides all employees involved in the phytosanitary management system with a general understanding of the USNCP must be implemented at the certified facility and documented in the USNCP Manual. In addition, employees must receive training related to the specific responsibilities of their job that relates to the USNCP, including a complete understanding of the regulatory and pest management requirements. Training records must be maintained by the facility for each employee and made available on request to APHIS and State or County officials.
The records are to include:

- Training schedule
- Type of training received
- Date of training
- Whether training was completed satisfactorily
- Any additional training needs identified

5.0 USNCP MANUAL

The USNCP Manual must outline all procedures implemented by the certified facility to ensure that plants certified under the USNCP meet the requirements of this Standard, including the administrative, pest management and record-keeping systems in place at the certified facility. There are two key components of the USNCP Manual: a description of the Phytosanitary Management System (Section 5.1); and a detailed Pest Management Plan (Section 5.2). A list outlining specific components which must be addressed within the USNCP Manual can be found in Appendix 5. A checklist used to guide manual reviewers is found in Addendum 1.

The certified facility must continually update its USNCP Manual to describe any changes to the procedures and staff which affect the program. The facility must inform the local APHIS contact in writing; by mail, facsimile or electronic mail; of any intended modification(s) to the USNCP Manual relevant to this Standard. APHIS must approve proposed changes to the USNCP Manual and/or the facility prior to implementation. APHIS may require modifications to the proposed changes prior to implementation.

The USNCP Manual must be type written. The manual must be clearly labeled with the name and address of the certified facility, the latest revision date, the number of pages, and the name and contact information of the person who prepared the manual. It must be signed by the Certification Manager and must have an amendment sheet providing space to document any additions, omissions or changes to the document, the date they were made, and who authorized the changes.

5.1 Phytosanitary Management System

The USNCP Manual must describe the Phytosanitary Management System that is used at the certified facility to consistently meet all the requirements of the USNCP Standards. The Phytosanitary Management System must include procedures relating to the sourcing of plant material, maintaining product identity, shipping certified material, controlling non-conforming product, conducting internal audits, generating corrective action requests, improving and maintaining the phytosanitary management system and the USNCP Manual, and the record keeping systems that verify compliance with this Standard.
5.1.1 **Sourcing of Plant Material**

The USNCP Manual must describe the name and location of all sources of new or incoming plant material. These sources could include on-site propagation, other certified facilities, non-certified facilities, brokers, wholesalers, and contract growers. The country or state where each of these sources is located must also be documented. APHIS must be notified of any change to the source of new or incoming plant material.

The USNCP Manual must describe measures to ensure sourced plant material is free of pests of concern and to mitigate the risk of introducing and transmitting plants pests. In addition, the USNCP Manual must describe measures which have been implemented to ensure documents are obtained by the certified facility which certify the country or state of origin and the identity of all sourced plant material.

The certified facility must maintain records verifying that all plant material certified under the USNCP meets the requirements outlined in Sections 2.2 (Eligible Plant Taxa) and Section 2.3 (Certifying Plant Material under the USNCP) of this Standard. Records identifying the place of origin and supporting the eligibility of plant material must be maintained in order for plant material to be exported from the United States under the USNCP.

5.1.2 **Product Identity**

The Phytosanitary Management System must include procedures for maintaining product identity within the certified facility from receiving until shipping and for tracing product forward and backward from the certified facility.

5.1.3 **Control of Non-Conforming Product**

The certified facility must have procedures in place to ensure that non-conforming product not certified does not contaminate other product. The Phytosanitary Management System must include the maintenance of detailed records that document non-conformances, corrective actions, audits, and follow-up examinations. The records must verify compliance with this Standard.

Facility staff must notify the Certification Manager immediately if any products are found to not conform to the requirements of this Standard. If product is found to be contaminated or suspected of being contaminated with a regulated pest, the Certification Manager or the Pest Control Manager must notify APHIS immediately.

5.1.4 **Internal Audits**

The Certification Manager must perform, or designate parties to perform one internal systems audit per year and four surveillance audits per year. The Certification Manager is responsible for supervising designated parties in the conduction of the audits. At least one
surveillance audit must be conducted during the active growing season and at least one must be conducted during the shipping season. A detailed report must be prepared within two weeks of conducting each audit and must be made available to the external audit teams from APHIS and the State or County Departments of Agriculture. APHIS audit teams will review the records from the internal audits as part of the external audit. APHIS suggests that internal audits be carried out prior to each external audit by APHIS and be conducted to complement the certification of plants (Section 2.3). The persons conducting the internal audit may not audit their own work.

**NOTE:** Internal audits focus on the systems in place at the certified facility and are NOT the same as pest scouting or monitoring. Surveillance audits, however, may include selective inspection of plant material for pests as part of the audit.

**Internal Systems Audits verify:**

- Processes at the facility are effective and adequate to meet the requirements outlined in this Standard
- Required documentation is current, readily available to staff, and sufficient to meet the requirements outlined in this Standard
- Phytosanitary Management System is operating in accordance with the specified requirements, including the performance of all staff as identified in the USNCP Manual
- Corrective action plan has been established to address each identified non-conformance

**Internal Surveillance Audits verify:**

- Pest Management Plan is effective in preventing the introduction or establishment of pests
- Facility employees are competent in identifying and controlling pests and carrying out the duties and responsibilities as outlined in the USNCP Manual
- Record-keeping procedures are in compliance with the USNCP Manual and are sufficient to keep track of the origin of plant material, etc.
- Action is taken on outstanding non-conformances and Corrective Action Requests

**NOTE:** Observations may be used to highlight, suggest, or reinforce particular practices. The recording of observations is optional and may use the form in Appendix 9. Observations may be noted during either internal audits, or when improvements to acceptable current practices are identified. If observations are noted between external audits, the observations must be retained with the facility’s records and must be presented to APHIS for review at the time of the next external audit.
Additional information about audits may be found in Appendices 6-9, and in Addendums 1-7.

5.1.5 Corrective Actions Requests Generated by the Certified Facility

Activities or products that are found to be in contravention of this Standard are considered non-conformances. A Corrective Action Request (see Appendix 8) must be generated for each non-conformance detected by the certified facility during an internal audit.

In addition, non-conformances must be classified as being critical, major, or minor in nature. Guidelines describing the classification of non-conformances can be found in Appendix 7. Corrective Action Requests must be completed within a specified period of time. Corrective Action Requests must include detailed instructions on how to prevent recurrences of the non-conformances and will generally require the amendment of the certified facility’s USNCP Manual. It is imperative for APHIS to be notified immediately regarding the presence, or suspected presence, of any critical non-conformance in the facility, or of any critical non-conformance associated with product purchased or sold by the facility. If APHIS is not immediately notified, the facility will be suspended from the program.

Observations may be used to identify situations of concern (which do not warrant a Corrective Action Request), or to describe practices which are worth highlighting, suggesting, or reinforcing. Observations should be reported and used by the certified facility to improve their USNCP Manual and Phytosanitary Management System. The form for the USNCP Observation Report may be found in Appendix 9.

5.1.6 Records and Documents

The Certified Facility must maintain records that verify the implementation of the Phytosanitary Management System as described in its USNCP Manual. The records should substantiate the country of origin of all certified plant material and demonstrate that plant material certified under the USNCP meets the requirements of this Standard. The certified facility must also maintain records verifying that the Pest Management Plan has been implemented, including details of all examinations, pest finds and corrective actions.

USNCP records must be kept on the premises of the certified facility and made available to APHIS and/or State or County officials upon request. All records pertaining to the USNCP must be maintained for a minimum of three (3) years regardless of the current status of the facility in the program. If records are maintained electronically, the nursery must make provisions for backing up all electronic records.

In addition, current copies of the following documents must be readily accessible for the use of all facility staff and contractors:

- USNCP Standards for Phytosanitary Measures
• CFIA Plant Protection Policy Directives (available at www.inspection.gc.ca)
• CFIA and USDA regulated pest lists
• Approved USNCP Manual of the certified facility
• Pertinent local or federal pest regulations

5.2 Pest Management Plan

The Pest Management Plan is a written description of procedures or processes designed to eradicate, control, or suppress pest populations to a level that meets the phytosanitary standard.

Each certified facility must implement a pest management plan that ensures consistent compliance with phytosanitary standards (freedom from quarantine and regulated non-quarantine pests, and practical freedom from other injurious plant pests). The procedure for implementing the pest management plan must be documented and included in the facility’s USNCP Manual and must be approved by APHIS. Required elements that must be contained in the pest management plan are described in this section of this Standard.

5.2.1 Pest and Commodity Specific Requirements

APHIS may require the Pest Management Plan to include additional requirements, such as examination and/or testing, for plant material with specific quarantine pest considerations. This higher risk plant material may include plants that are hosts to specific pests of concern, plants imported from outside continental North America, plants exported to provinces in Canada that have additional certification standards, or stock plants that are held for more than a growing season.

In cases where additional pest or commodity specific quarantine requirements apply to the certified facility, or to products produced by the Certified Facility, the USNCP Manual must include descriptions of how each of the specific quarantine requirements are being met. The Pest Management Plan must outline any cultural practices, sampling, testing, treatments, or other measures that are in place to ensure that the product to be certified meets all phytosanitary requirements, both general and specific. The Certification Manager or the Pest Control Manager 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 Pest Management Plan. The Pest Management Plan must be readily available for use by employees involved in implementing the USNCP.

5.2.2 Maps of the Certified Facility

The Pest Management Plan must include maps of the certified facility that indicate the flow of plant material through the facility. The maps must be labeled to identify the receiving, production, handling and shipping areas as well as any other areas referred to in the USNCP Manual.
5.2.3 Incoming Plant Material

The Pest Management Plan must describe the measures that are in place to ensure that all nursery stock entering the certified facility is free of quarantine and regulated non-quarantine pests of the United States and Canada and practically free of non-regulated plant pests. The PMP must also describe the facility will mitigate the risk of introducing and transmitting plant pests.

New plant material must remain physically separated from other plant material and may not be integrated into the certified facility’s production system until the material is examined and found free of regulated plant pests and practically free of other plant pests. The examination must be conducted by either the Pest Control Manager or appropriately trained and designated staff member. Once the material has been inspected and is determined to be free of regulated plant pests and practically free of other plant pests, it may be moved into the production areas of the certified facility. If pests are found, control measures must be taken immediately. Details of all examinations must be recorded, including a description of any pest(s) found and corrective actions taken.

Records of the origin, movement, examination, and treatment of plant material must be maintained by the certified facility and must be made available to APHIS and/or State or County officials on request.

Plant material imported to the United States is subject to the requirements of 7 CFR 319.37 and inspection by APHIS regardless of the importer’s participation in the USNCP.

5.2.4 Examination of Production Areas

All plant material in a certified facility, including plants destined for domestic markets and all production areas, must be examined by the pest control manager or by designated staff according to the methods, frequency and intensity specified in the pest management plan. Each block (defined as an area representing a continuous cultivar) must be examined using general surveillance with any suspect plants being examined closer. Details of all examinations must be recorded, including a description of any pest(s) found and corrective actions taken. These records must be made available to APHIS, State, or County officials upon request.

5.2.5 Examination of Shipping Areas and Export Shipments

When shipments are being prepared for export, the Pest Control Manager or designated staff must examine the shipping areas to ensure that the phytosanitary standards are met and pest contamination does not occur. Each shipment of plant material certified under the USNCP must be examined for pests at the time of shipping. Details of all examinations must be recorded and include a description of any pest finds and corrective actions taken.
5.2.6 Handling, Storage and Delivery

The certified facility must establish adequate handling, storage and delivery procedures to ensure that pest contamination of healthy, examined and verified product does not occur prior to its receipt by the consignee. Product that has been examined and verified as being free of pests must be kept separated from non-verified material.

5.2.7 Pest Detection

APHIS and State or County Department of Agriculture officials must be notified immediately of any pest finds of significance. Examples of such situations are observation of atypical or uncommon pest damage or symptoms, detection of a new pest in a production area, or suspicion of the presence of a quarantine pest. In the event of an infestation by a quarantine pest, APHIS and State or County Department of Agriculture officials will work co-operatively with the pest control manager to ensure that effective controls are exercised by the facility to eradicate the pest and to minimize the effects to the producer. Failure to notify APHIS and the State or County Department of Agriculture when a quarantine or regulated non-quarantine pest is found by a certified facility is considered a Critical Non-Conformance which will result in immediate suspension from the USNCP.

The facility must maintain a pest record which documents all pest findings, identifications and submissions to laboratories.

NOTE: A quarantine pest interception traced back to a certified facility is also a critical non-conformance that will result in a suspension of the certified facility from the USNCP until a corrective action is completed and the USNCP Manual is modified to prevent re-occurrence of the non-conformance.

5.2.8 Pest Control

Pest control strategies must be employed by the certified facility to maintain freedom from quarantine pests and regulated non-quarantine pests, and practical freedom from other injurious pests. The tolerance for non-regulated pests depends on the phytosanitary risk they present to certified plant material. These strategies must be documented in the Pest Management Plan and may include cultural (weed control, general sanitation), physical, biological (integrated pest management (IPM) program with established threshold levels for specific beneficial organisms) and/or chemical controls. Plants that are contaminated by non-regulated plant pests must be treated or culled in a manner that is effective and that mitigates the risk of contamination of other products.

Modules may be added as appendices to address specific regulated pests of concern. The module should address how the nursery will mitigate the risk of the regulated pest through receiving, production, and shipping procedures.
Records must be maintained by the certified facility which document that such pest control strategies have been implemented, including details of all examinations, pest findings and corrective actions undertaken as a result.

5.2.9 Control of Non-Conforming Product

The Pest Management Plan must describe how non-conforming product is identified and treated. Measures must be implemented to prevent the shipment of plant material under the USNCP that does not meet the phytosanitary requirements of this Standard. These measures must be described in the pest management plan. The pest management plan must also include procedures for the sampling and testing of plant material in order to detect pests of concern that are not easy to discover by visual inspection alone and for notifying the certification manager and APHIS and the State or County Departments of Agriculture if product is contaminated, or suspected to be contaminated, with a regulated pest. If the product is contaminated with a quarantine pest, APHIS and the State or County Department of Agriculture must be notified in writing within 48 hours.

Culled plant material must be disposed of in a manner that mitigates the risk of infecting other plant material and the environment.

6.0 SUSPENSION FROM THE USNCP

A certified facility that is not able to maintain the required phytosanitary conditions, does not implement corrective actions in a timely manner, or is found violating any condition of the USNCP will be advised in writing by APHIS of their suspension from the program (section 3.6.3). Plant material shall not be exported under a USNCP Phytosanitary Certificate from a facility that has failed to meet the program requirements as stipulated in this Standard. The facility must return all Phytosanitary Certificates to APHIS or the State or County upon request. Plant material originating from a non-compliant facility may be issued Phytosanitary Certificates by Federal, State or County ACOs on the basis of a satisfactory phytosanitary product inspection. Phytosanitary Certificates will not be issued for any plant material not meeting the phytosanitary standards.

Phytosanitary product inspection by Federal, State or County ACOs will be the only option available for export certification unless corrective measures are taken to bring the facility into compliance with the USNCP. The suspended facility must re-apply for certification. APHIS will then review the revised USNCP Manual and conduct a Facility Evaluation to verify program compliance.

7.0 APPENDICES AND ADDENDUMS

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Regulated pests of Canada which may be present in the U. S. include, but are not limited to:

- Alfalfa snout beetle (*Otiorynchus ligustici*)
- Apple ermine moth (*Yponomeuta malinellus* Zeller)
- Apple maggot (*Rhagoletis pomonella* Walsh)
- Apple proliferation mycoplasma
- Asian Long-Horned Beetle (*Anoplophora glabipennis* Motchulsky)
- Azalea flower spot disease (*Ovulinia azaleae* Weiss)
- Balsam wooley adelgid (*Adelges picea* Ratzburg)
- Black currant reversion disease
- Blueberry maggot (*Rhagoletis mendax* Curran)
- Boring beetle (*Anopophlora spp*)
- Brown rot (*Ralstonia solanacearum* race 3), (*Pseudomonas solancearum*)
- Brown rot (*Monillinia fructigena* Alderhold et Ruhl) Honey ex Whetzel
- Burrowing nematode (*Radopholus similis* (Cobb) Thorne)
- Chrysanthemum white rust (*Puccinia horiana* P. Henn.)
- Columbia root-knot nematode (*Meliodogyne chitwoodii* Golden et al)
- Dutch elm disease (*Ophistomma (=Ceratocystis) ulmi* Buism.) Nannf.
- Dwarf Bunt (*Tilletia controversa* Kuhn)
- Eastern filbert blight (*Anisogramma anomala* (PK) Muller)
- European brown garden snail (*Helix aspersa* Mueller)
- European corn borer (*Ostrinia nubilalis* Hübner)
- European larch canker (*Lachnellula willkommi*(Hartig) Dennis)
- Golden nematode (*Globodera rostochiensis* Woll.)
- Grapevine anthracnose (*Elsinoe ampelina*(de Bary) Shear)
- Gypsy moth (*Lymantria dispers* (L.)),
- Japanese beetle (*Popillia japonica* Newman)
- Narcissus bulb nematode, onion bulb nematode, stem and bulb nematode (*Ditylenchus dipsaci* (Kuhn) Filipjev)
- Oak wilt (*Ceratocystis fagacearum* (T.W. Bretz) J. Hunt)
- Onion white rot (*Sclerotium cepivorum* Berk.)
- Oriental fruit moth (*Grapholita molesta* (Busck))
- Pale cyst nematode (*Globodera pallida* Stone)
- Pear decline and moria mycoplasma,
- Pine shoot beetle (*Tomicus piniperda* L.)
- Plum pox virus
- Potato rot nematode (*Ditylenchus destructor* Thorne)
- Potato smut (*Thecaphora solani* Barrus)
- Potato wart (*Synchytrium endobioticum* Schlib)
- Scleroderris canker (*Gremmeniella abietina* (Lagerb.) Morelet)
- Soybean cyst nematode (*Heterodera glycines* Ichinohe)
- Sudden oak death (*Phytophthora ramorum* Werres et al.)
  and any other pests which according to a risk assessment are determined to be regulated pests.

A more complete list may be found at:

Fact sheets describing many of the pests regulated by Canada may be found through links at that website.

Other pests may be considered regulated pests in Canada. The certified facility’s staff should contact APHIS officials for updated Canadian quarantine pest information. It is the certified facility’s responsibility to ensure that shipments of nursery stock meet the specific requirements of CFIA. The local office of APHIS or the State or County Department of Agriculture will be able to advise certified facilities of particular Canadian provincial requirements.
APPENDIX 2: PLANTS EXCLUDED FROM THE UNITED STATES NURSERY CERTIFICATION PROGRAM FOR EXPORT TO CANADA

A. Any plant imported into the United States in growing media from a country other than Canada. Plant material imported into United States under the Growing Media Program (GMP) (plants rooted in pre-approved non-soil media) is prohibited from entry into Canada regardless of the length of time grown in US. Subsequent generations of plants, originating from the GMP mother plants, are eligible under the USNCP. The only exception applies to plant material that originates from facilities approved under both the CFIA and USDA Growing Media Programs. Contact your local APHIS office for a list of those facilities.

B. Plants of the following genera/species are prohibited from all US origins to all provinces under the USNCP:

- Berberis spp.
- Chaenomeles spp.
- Cuscuta spp.
- Cydonia spp.
- Mahoberberis spp.
- Mahonia spp.
- Malus spp.
- Nicotiana tabacum
- Orobanche spp.
- Prunus spp.
- Pyrus spp.
- Rhamnus spp.
- Striga spp.
- Vitis spp.

Some of this material may be shipped to Canada under various other programs. Please check with your local APHIS office for specific information or see CFIA policy directives at: http://www.inspection.gc.ca/english/plaveg/protect/dir/directe.shtml

C. Plants of the following genera are prohibited to specific provinces:

**Genera:**  
**Prohibited to:**

Abies spp. (from all states)  
British Columbia

Corylus spp (from states other than AZ, CA, ID, NV, and UT)  
British Columbia

Ulmus spp. (from all states)  
All provinces other than New Brunswick, Ontario and Quebec

Zelkova spp. (from all states)  
All provinces other than New Brunswick, Ontario and Quebec
D. Plants which are regulated by the Convention on International Trade in Wild Flora and Fauna (CITES) or the Endangered Species Act (ESA) may not be certified under the USNCP, regardless of origin. Examples of plants protected under CITES includes all members of the families of Cactaceae, Cycadaceae, Orchidaceae and Zamiaceae.

A list of plants which are regulated by CITES may be found at the website: http://www.cites.org/eng/app/e-appendices.pdf

A list of plants that are regulated by ESA may be found at: http://www.fws.gov/endangered/wildlife.html
E. Plants of the following genera/species are prohibited from specified areas of the United States:

Host of *Phytophthora ramorum* from infested (quarantine) areas (NOTE: this list is subject to frequent changes - for an up to date list go to:

http://www.inspection.gc.ca/english/plaveg/protect/dir/sodspe.shtml)

Abies spp.
Acer spp.
Adiantum spp.
Aesculus spp.
Arbutus spp.
Arctostaphylos spp.
Ardisia spp.
Calluna spp.
Calycanthus spp.
Camellia spp.
Castanea spp.
Castanopsis spp.
Ceanothus spp.
Cercis spp.
Cinnamomum spp.
Clitonia spp.
Cornus spp.
Corylopsis spp.
Corylus spp.
Distylium spp.
Drimys spp.
Dryopteris spp.
Eucalyptus spp.
Euonymus spp.
Fagus spp.
Frangula spp.
Fraxinus spp.
Garrya spp.
Gaultheria spp.
Griselinia spp.
Hamamelis spp.
Heteromeles spp.
Ilex spp.
Kalmia spp.
Laurus spp.
Leucothoe spp.
Lithocarpus spp.
Loropetalum spp.
Lonicera spp.
Magnolia spp.
Mahonia spp.
Maianthemum spp.
Manglietia spp.
Michelia spp.
Nerium spp.
Nothofagus spp.
Osmanthus spp.
Osmorhiza spp.
Parrotia spp.
Parakmeria spp.
Photinia spp.
Physocarpus spp.
Pieris spp.
Pittosporum spp.
Prunus spp.
Pseudotsuga spp.
Pyracantha spp.
Quercus spp.
Rhododendron spp.
Rosa spp.
Rubus spp.
Salix spp.
Schima spp.
Sequoia spp.
Syringa spp.
Taxus spp.
Torreya spp.
Toxicodendron spp.
Trientalis spp.
Umbellularia spp.
Vaccinium spp.
Vancouveria spp.
Viburnum spp.

Hosts of Oak Wilt Disease from regulated Areas:
Castanea spp,
Castanopsis spp.
Lithocarpus spp.
Quercus spp.

Fraxinus spp. from Emerald Ash Borer infested counties in IN, MD, MI, OH, and VA

Juniperus spp. from Contra Costa County CA due to Pear-juniper Rust caused by the fungus *Gymnosporangium fuscum*
Larix spp. from Larch Canker infested counties and townships in ME, NH, NY, and VT

Pinus spp. from Scleroderris Canker infested counties and areas in ME, NH, NY and VT

Pinus spp. from Pine Shoot Beetle infested counties of CT, IA, IL, IN, MA, MD, MI, NH, NY, OH, PA, VT, WI, and WV

Pseudolarix spp. from Larch Canker infested counties and townships in ME, NH, NY and VT

F. Plants which are prohibited whose origin is other than the United States and Canada:
(NOTE: this list is subject to change - for an up to date list go to:

Abies spp. from Japan, Switzerland and the European Union, excepting Netherlands
Acer spp. from any country except Germany, Japan, New Zealand and the Netherlands
Adiantum spp. from Switzerland, Norway and the European Union, excepting Netherlands
Aesculus spp. from Switzerland, Norway and the European Union, excepting Netherlands
Ajania spp.
Alnus spp. from a number of countries, see D-00-08
Arbutus spp. from Switzerland, Norway and the European Union, excepting Netherlands
Arctostaphylos spp. from Switzerland, Norway and the European Union, excepting Netherlands
Ardisia spp. from Switzerland, Norway, the European Union, excepting Netherlands
Armoracia rusticiana from a number of countries see D-02-06
Apera ssp. from Switzerland, Norway and the European Union, excepting Netherlands
Apera ssp. from Japan, Switzerland and the European Union, excepting Netherlands
Azalea spp. from Switzerland, Norway and the European Union, excepting Netherlands
Berberis spp. all species
Brassica spp. various species from a number of countries see D-02-06
Calluna spp. from Switzerland, Norway and the European Union, excepting Netherlands
Calycanthus spp. from Switzerland, Norway and the European Union, excepting Netherlands
Camellia spp. from Switzerland, Norway and the European Union, excepting Netherlands
Capsella bursapastoris from various countries see D-02-06
Capsicum spp.
Castanea spp. from Switzerland, Norway, the European Union, excepting Netherlands
Castanopsis spp. from Switzerland, Norway and the European Union, excepting Netherlands
Ceanothus spp. from Switzerland, Norway and the European Union, excepting Netherlands
Cercis spp. from Switzerland, Norway, the European Union, excepting Netherlands
Chaenomeles spp. except from approved sources in Belgium, England, France, Germany and the Netherlands
Chrysanthemum spp.
Cinnamomum spp. from Switzerland, Norway and the European Union, excepting Netherlands
Clitonia spp. from Switzerland, Norway and the European Union, excepting Netherlands
Cioncyca monensis cheiranthose from several countries, see D-02-06
Cioncyca wrightii from several countries, see D-02-06
Cornus spp. from Switzerland, Norway, the European Union, excepting Netherlands
Corylopsis spp. from Switzerland, Norway, the European Union, excepting Netherlands
Corylus spp
Cuscuta spp.
Cyathaea spp. from Australia
Cydonia spp. except from approved sources in Belgium, England, France, Germany and the Netherlands
Dendranthema spp.
Dicksonia spp. from Australia
Diplotaxis erucoides from several countries, see D-02-06
Distylium spp. from Switzerland, Norway, the European Union, excepting Netherlands
Drimys spp. from Switzerland, Norway and the European Union, excepting Netherlands
Drimys spp.
Union, excepting Netherlands

**Dryopteris spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Erica spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Eruca sativa** from several countries, see D-02-06

**Erucastrum incanum** from a number of countries see D-02-06

**Erysimum cheiranthoides** from a number of countries see D-02-06

**Eucalyptus spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Euonymus spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Fagus spp.** from Switzerland, Norway, the European Union, excepting Germany and Netherlands

**Fragaria spp.**

**Frangula spp.** from Switzerland, Norway, the European Union, excepting Netherlands

**Fraxinus spp.** from Germany and Netherlands

**Garrya spp.** from Switzerland, Norway, the European Union, excepting Netherlands

**Gaultheria spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Griselina spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Hamamelis spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Heteromeles spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Ilex spp.** from Switzerland, Norway, and the European Union, excepting Denmark and Netherlands

**Isatis tinctoria** from a number of countries see D-02-06

**Juniperus spp.** from Europe, Asia and North Africa

**Kalmia spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Larix spp.** from Europe and Japan

**Laurus spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Leucanthemella serotina**

**Leucothoe spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Lithocarpus spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Lonicera spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Loropetalum spp.** from Switzerland, Norway, and the European Union, excepting Netherlands

**Lycopersicum lycopersicum**

**Magnolia spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Mahoberberis spp.**

**Mahonia spp.**

**Malus spp.** except from approved sources in Belgium, England, France, Germany and the Netherlands

**Malus sylvestris** from Switzerland, Norway, and the European Union, excepting Netherlands

**Michelia spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Nicotiana spp.**

**Nipponanthemum nipponicum**

**Nothofagus spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Orobanche spp.**

**Osmanthus spp.**

**Osmarea spp.**

**Osmorhiza spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Parakmeria spp.** from Switzerland, Norway, and the European Union, excepting Netherlands

**Parrotia spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Physocarpus spp.** from Switzerland, Norway, the European Union, excepting Netherlands

**Physocarpus opulifolius**

**Pittosporum spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Populus spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Pseudolarix spp.** from Europe and Japan

**Pseudotsuga spp.** from Switzerland, Norway, and the European Union, excepting Netherlands
Netherlands

**Pyracantha spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Pyrethrum uliginosum**

**Pyrus spp.** except from approved sources in Belgium, England, France, Germany and the Netherlands

**Quercus spp.** from all countries except Germany, Netherlands, and Japan

**Raphanus spp.** various species from a number of countries see D-02-06

**Rapistrum rugosum** various species from a number of countries, see D-02-06

**Rhamnus spp.**

**Rhododendron spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Ribes spp.** from Europe

**Rosa spp.** from Switzerland, Norway, and the European Union, excepting except the United Kingdom (rooted plants only), Germany (approved facility only), the Netherlands, and Denmark

**Rubus spp.** from Switzerland, Norway and the European Union, excepting Germany and Netherlands

**Salix spp.**

**Schima spp.** from Switzerland, Norway, and the European Union, excepting Denmark and Netherlands

**Sequoia spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Sinapis spp.** from a number of countries see D-02-06

**Sisymbrium officinale** from a number of countries see D-02-06

**Solanum spp.**

**Syringa spp.** from Switzerland, Norway and the European Union, excepting Germany (approved facility) and Netherlands

**Taxus spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Thlapsi arvense** from a number of countries see D-02-06

**Torreya spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Toxicodendron spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Trientalis spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Ulmus spp.** only admissible to New Brunswick, Ontario and Quebec

**Umbellularia spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Vaccinium spp.** except Australia

**Vancouveria spp.** from Switzerland, Norway and the European Union, excepting Netherlands

**Viburnum spp.** from Switzerland, Norway and the European Union, excepting Germany (approved facility) and Netherlands

**Vitis spp.** except from approved sources in Germany and France

**Zelkova spp.** only admissible to New Brunswick, Ontario and Quebec
APPENDIX 3: APPLICATION FOR DESIGNATION IN THE UNITED STATES NURSERY CERTIFICATION PROGRAM

Name of Facility: _________________________________________________________________________________

Certification Manager: _____________________________________________________________________________

Pest Control Manager: ____________________________________________
Physical Address: _________________________________________________________

Mailing Address: __________________________________________________________________________________
E-mail address: ________________________________________________________________________________

Telephone No.: ______________________________________ Fax No.: ________________________________

_____________________________________________________________________________________________

Conditions for Exporting Nursery Stock to Canada under the US Nursery Certification Program (USNCP):

1. Export shipments must consist of eligible nursery stock for exportation to Canada.

2. Exported nursery stock must be propagated and produced in a nursery facility certified by USDA for export under the USNCP and as outlined in Plant Protection Quarantine Standards for Phytosanitary Measures. The certified facility must specify within its USNCP Manual a method of determining and maintaining records of the origin of any sourced material and an examination process sufficient to preclude the transmission of pests and diseases on that material.

3. Records of nursery stock shipped under the USNCP must be maintained at the certified facility for at least three years after shipment, regardless of the current status of the nursery in the USNCP.

4. Appropriate measures must be taken to ensure that the nursery stock to be exported is packaged and stored in a manner to preclude contamination by quarantine pests and remain practically free of other injurious pests.

5. Exporters must design an USNCP Manual explaining how they will meet the Plant Protection and Quarantine Standards for Phytosanitary Measures. USDA will be responsible for the review and the approval of the USNCP Manual.

6. Exporters must undergo an initial facility evaluation to ensure that the facility has the infrastructure and staff in place to successfully implement the phytosanitary management system outlined in its USNCP Manual and meet the requirements of the USNCP Standard.

7. Exporter must perform periodic internal audits of the USNCP program and submit to external audits performed by APHIS and State or County co-operators.

I, ______________________________________ the owner/person in possession, care, or control of the above named facility have read and understood all the conditions and obligations stated herein by which I may export specific genera of nursery stock, in accordance with the USNCP.

Further, I am and shall be responsible for and shall attach no liability to the United States Department of Agriculture or to any officer or representative of the Department, from and against all manners of actions, causes of
action, claims, demands, loss, costs, damages, actions or other proceedings by whomsoever made, sustained, brought or prosecuted in any manner based upon, caused by, arising out of, attributable to or with respect to any failure, inadvertent or otherwise, by act or omission, to fully comply with the said conditions and requirements.

Dated _______________ at _______________ State of _______________________

Applicant's Signature: _____________________________________________________

-FOR OFFICIAL USE ONLY-

Facility Number (assigned by National Accreditation Manager): _______________________________

USNCP Manual Approved:

___________________________________________________  ____________
Signature, Authorizing Official, USDA             Print

DATE

Facility Evaluation Successfully Completed:

___________________________________________________  ____________
Signature, Authorizing Official, USDA             Print

DATE

Approved for Participation in the USNCP Program:

___________________________________________________  ____________
Signature, Authorizing Official, USDA             Print

DATE


APPENDIX 4: REQUIREMENTS FOR CERTIFICATION MANAGERS AND PEST CONTROL MANAGERS

Certification Manager: The Certification Manager is a member of the management team of the certified facility vested with the authority and responsibility to develop and implement a phytosanitary management system that meets the requirements of the USNCP. The Certification Manager may designate qualified personnel or contractors to assist in the development and implementation of different components of the phytosanitary management system such as pest management, record keeping, and administration. The Certification Manager may only delegate those tasks for which there is a trained, competent, and qualified individual available.

As a minimum, the certification manager must:

- Be a member of the management team of the facility
- Have a thorough understanding of phytosanitary management systems
- Have a thorough understanding of this Standard and demonstrate the capability to ensure the requirements described in this Standard are met
- Be committed to ensuring compliance with Standard through implementation of the phytosanitary management system at the facility
- Understand U.S. plant health export regulations and relevant Canadian import requirements
- Ensure that employees that are designated to carry out particular activities have appropriate qualifications and expertise and
- Have the ability to evaluate employee performance as related to all components of the phytosanitary management system operating at the facility

Pest Control Manager (or Advisor) – The certified facility may designate a pest control manager (or advisor) to carry out various tasks related to the implementation of the pest management plan at the certified facility. The pest control manager is an individual employed by or contracted to the certified facility.

At a minimum, the pest control manager must:

- Have experience in pest management plans to ensure pest freedom in plant material
- Have experience in liaising with local, state, federal or university/college horticultural specialists
- Have knowledge of common pest organisms (identification, biology and host relationships), including local quarantine pests
- Have knowledge of the recommended control procedures in accordance with EPA pesticide regulations and/or by label direction

- Be capable of identifying plant material within ornamental nursery facilities

- Understand the host plant and pest relationship for a broad range of horticultural pests

- Have a knowledge of how to prepare and submit samples of pests to APHIS, the State Departments of Agriculture, or to a laboratory recognized by APHIS to receive and analyze samples

- Have an understanding of APHIS export regulations and requirements and the CFIA plant health import regulations and requirements

- Be able to effectively plan and conduct routine field examinations of the production areas to verify that all plant material is free of quarantine pests and practically free of other injurious pests

- Be able to develop and maintain a system of documentation to verify pest freedom, attest to the origin of plant products, record treatments conducted within the nursery, and document examination results

- Be able to establish procedures to isolate, hold, and treat infested plant material

- Be able to establish preventative actions to minimize the risk of future infestation

- Be capable of developing and utilizing procedures that confirm plant materials brought into the nursery are practically free of pests and, if infested with pests, are effectively treated to remove the infestation

- Have the capacity to implement a system to ensure shipments of plants destined for export to Canada are completely free of quarantine pests and regulated plant pests, practically free of all other pest organisms, and meet the import requirements of Canada

- Have a thorough understanding of this Standard and demonstrate the capability to carry out the requirements described in this Standard

- Be committed to ensuring compliance with this Standard by managing the export production system (pest management plans and record retention programs) in the facility

- Ensures that employees conducting pest control or eradication activities have expertise in performing those tasks
•Possesses the ability to train staff who are responsible for conducting routine pest monitoring, pest control or eradication activities within the facility

•Be committed to promptly notifying APHIS and the State or County Departments of Agriculture of all new, unusual or unidentified pest finds in the facility; and

•Be employed or contracted to serve at a facility having received or in the process of receiving certification; or Be employed by a State recognized institute/organization whose business is the provision of independent technical services to nurseries; or Be employed by a nursery and whose primary function is the provision of technical services as specified by contractual agreement between the facility or applicant and the PCM
APPENDIX 5: USNCP MANUAL TEMPLATE

NOTE: This template is intended to provide guidance to facilities in the development of their USNCP Manuals. In order to ensure that all requirements of the USNCP Program are met, this template must be used in association with the USNCP Standards in the development of the facility’s USNCP Manual. To expedite the review of USNCP Manuals, facilities are required to adhere to the order of components in the template. Failure to do so will result in return of the USNCP Manual for resubmission.

CONFIDENTIALITY: USNCP Manuals are considered to be confidential documents.

GENERAL REQUIREMENTS

The USNCP Manual must be type written, dated and signed by the certification manager. The preferred submission method is electronic.

The title page must include the name and address of the facility, the date, and the name and contact information of the person(s) who prepared the document.

The facility’s USNCP Manual must include:

a. An amendment sheet which provides space to document any additions, omissions or changes to the document, the date they were made and who authorized the change

b. A general description of the facility’s business including:
   • Company history
   • Business objectives or mission statement
   • Acreage under production (container, field, greenhouse, etc.)
   • A brief description of production, shipping and receiving locations
   • The relationship between multiple facility locations, if applicable

ADMINISTRATION

1). Management Commitment – The facility’s management is responsible for the development and maintenance of a phytosanitary management system that precludes introduction or transmission of quarantine or regulated pests to or from the facility. The commitment of the facility’s management will ultimately be responsible for the success of the program.

The facility’s USNCP Manual must include statements in which:

a. Management commits to ensuring that the procedures described in the USNCP Manual are effective for maintaining the integrity of certified plant material and that all procedures described therein are fully implemented

b. Management commits to the allocation of resources necessary to implement changes, procedures, corrective actions and otherwise ensure compliance with the USNCP Standard

c. The facility’s USNCP Manual must provide the name, title, and contact information for key staff, such as:
   a. President and/or owner
   b. General Manager/Certification Manager
   c. Certification Manager (if different than above)
d. Pest Control Manager

The facility’s USNCP Manual **must** include the designation by management of:

a. A certification manager and a pest control manager who have qualifications which meet the requirements of Appendix 4 of the USNCP Standards

b. Qualified alternates capable of functioning in those positions in the absence of the designated personnel

2). Training - Management must ensure that the facility has sufficient capable, trained staff employed to carry out the requirements of the USNCP Standard and must identify all employees involved in the implementation of the facility’s phytosanitary management system.

I. All employees involved in implementing the phytosanitary management system must receive training that provides a general understanding of the USNCP program and the management system, and must receive specific training related to those components for which they have a responsibility.

The facility’s USNCP Manual must describe the training program which covers the operational aspects of the USNCP, including the type of training, frequency, duration and intended audience.

II. All propagation, production and shipping staff must be trained to visually identify pests, diseases, and damage or symptoms caused by pests or disease. Staff must be trained to identify common pests and diseases and also quarantine and regulated plant pests.

The facility’s USNCP Manual must describe the pest detection/identification training program, including the type of training, frequency, duration and intended audience.

The training program, as described in the USNCP Manual, must include:

a. Methods of pest detection (for both general and specific pests of concern)

b. Process of pest submission for identification

c. Inspection of incoming plants

d. Inspection of propagated material and/or stock plants

e. Inspection of material to be shipped, including specific inspection requirements for specific plant categories

f. General standards for all plants – Handling pest finds, reporting of pest finds, and recording treatments and actions.

g. Records management – Using record keeping forms, locating forms, retaining records, and audit requirements.

III. A record of staff training must be developed and retained by the facility for all training conducted.

Records of staff training, as described in the facility’s USNCP Manual, must include:

a. Training schedule

b. Type of training received

c. Date of training
d. Whether training was completed satisfactorily  
e. Any additional training needs identified  
f. Names and signatures of trainees

IV. The facility’s USNCP Manual must include an example of the training record used to document training as a referenced Appendix.

V. The facility’s USNCP Manual must describe a system for maintaining training records.

3). Staff Responsibilities – Management must assign the responsibility of implementing the USNCP to qualified staff members.

The facility’s USNCP Manual must include:

a. A list of the titles, specific duties, responsibilities and qualifications (as relates to the US Nursery Certification Program) of all staff involved in implementing the USNCP  
b. Specific names for those positions and qualified alternates specified in a referenced Appendix  
c. Management’s mandatory designation of specific individuals to fill the Certification Manager and the Pest Control Manager (or Pest Control Advisor) positions whose qualifications meet the requirements specified in Appendix 4  
d. Management’s mandatory designation of specific qualified alternates for the positions of Certification Manager and Pest Control Manager  
e. A description of other specific positions as applicable:
   • Grower  
   • Pesticide Applicator  
   • Receiving Manager  
   • Shipping Manager  
   • Dispatcher  
   • Others – specify

PEST MANAGEMENT PLAN

1). Incoming Material: All sources of new plant material must be identified, including on-site propagation and outside sources. The country of origin for each source of new plant material must be identified. The inspection of all incoming plant material must be documented, including the inspection process, results of the inspection, and any actions taken as the result of pest finds.

The facility’s USNCP Manual must describe:

a. All sources for new plant material. A list of suppliers for plant material acquired from offsite sources should be provided in an appendix. If the supplier list changes frequently, the appendix can describe where the supplier list is kept at the certified facility and who is responsible for maintaining the list instead of providing the names of the suppliers.  
b. Measures to ensure that documentation is maintained to support the origin of all plant material.  
c. Measures to comply with any pest-specific, origin-specific or commodity-specific phytosanitary requirements of the CFIA or USDA  
d. Measures to maintain the identity of the plant material within the facility from receiving until shipping
e. Measures to maintain records verifying plant material meets the requirements for sourcing as outlined in Section 2.2 of the USNCP Standard.

f. Measures to ensure all plant material entering the facility is free of quarantine and regulated plant pests and practically free of non-regulated plant pests

g. Measures to mitigate the risk of introducing and transmitting plant pests

h. Procedures to ensure new plant material remains physically separated from other plant material until an examination is completed and the material is found free of plant pests

i. Procedures for the inspection of plants received at the facility, including the titles of staff positions responsible for conducting the inspection

j. Procedures to be followed if quarantine, regulated or non-regulated plant pests are found during the receiving inspection

k. Records of inspection results:
   - Type and quantity of material inspected
   - Origin of material
   - Date of inspection
   - Name of person(s) conducting the inspection
   - Pests/diseases detected and control methods used

f. An example of the incoming inspection record must be provided in a referenced Appendix.

2). Production Process: The inspection and phytosanitary management practices conducted at various locations/stages of the production process must be documented. In addition to specifying details of the inspection process, responsible staff members should be identified.

The facility’s USNCP Manual must describe:

a. Physical layout of the facility and the flow of plant material through the facility and illustrate it on a labeled map of the facility in a referenced appendix.

b. Procedures to maintain product identity within the facility

c. Procedures or processes designed to eradicate, control or suppress past populations to a level that meets the phytosanitary standard of freedom from quarantine and regulated plant pests and practical freedom from non-regulated plant pests. This may be included as a referenced appendix.

d. Methods, frequency and intensity of the inspection of all plant material in the facility

e. Procedures for documenting inspection results, including:
   - Type and quantity of material inspected
   - Location of material inspected
   - Date of inspection
   - Name of person(s) conducting the inspection
   - Description of pests found
   - Corrective actions taken as the result of pest finds
   - Methods to evaluate the efficacy of corrective actions taken

f. Procedures to be followed if pests are found, including:
   - Identification of unknown pests
   - Response to a non-regulated pest find
   - Response to a quarantine or regulated pest find
   - Notification of the certification manager immediately in the event of a suspected quarantine or regulated pest find
• Notification of USDA and State and/or County Departments of Agriculture in the event of a quarantine or regulated pest find
• Treatment or disposal of plant material contaminated by quarantine or regulated plant pests
g. Procedures for maintaining records of inspections, pest finds, pest submissions, pest identifications, and corrective actions taken for at least 3 years
h. Examples of inspection records, corrective actions/treatment records, and pest submission records in a referenced appendix

In cases where additional pest or commodity specific quarantine requirements apply to the facility, or to products produced by the facility, the facility’s USNCP Manual must describe:
   a. Procedures to describe how each of the specific quarantine requirements are met
   b. The name (s) and qualifications of any laboratories used to meet testing requirements
   c. Procedures for maintaining records which document that specific quarantine requirements have been met

3). Outgoing Materials – The inspection process for plant material shipped from the facility must be documented, including the details of the inspection, the staff responsible for the inspection and results of the inspection.

The facility’s USNCP Manual must describe procedures for:
   a. Internal notification process that identifies export shipments
   b. Maintaining product identity
   c. Inspecting plant material to be exported or shipped from the facility including:
      • Inspection of foliage and stems
      • Inspection of Soil and/or roots
      • Inspection of packing material and/or shipping containers
   d. Handling pests detected during the shipping inspection
   e. Documenting the shipping inspection including:
      • Type and quantity of material inspected
      • Origin of plant material
      • Date of inspection
      • Name of person conducting the inspection
      • Pests detected and methods used to control pests
   f. Maintaining records of shipping inspections, pest finds, pest submissions, pest identifications and corrective actions taken
   g. Tracing product backwards and forwards from the facility
   h. Preventing certification of non-conforming product under the USNCP and contamination of other products
   i. Handling, storing and delivering product which has been examined and found free of pests to ensure it is not contaminated prior to receipt by the consignee
   j. Ensuring all pest and commodity specific requirements are met prior to shipping
   k. Maintaining records that verify all plant material shipped under the USNCP meets the requirements of Section 2.2 (Sourcing of Plant Material), Section 2.3 (Eligible Plant Taxa) and Section 2.4 (Propagative Origin) of the USNCP Standards
1. Examples of shipping inspection records, corrective actions/treatment records and pest submission records included as a referenced appendix

**PHYTOSANITARY MANAGEMENT SYSTEM**

The USNCP Manual must describe the Phytosanitary Management System used by the facility to consistently meet all the requirements of the USNCP. This includes the sourcing of plant material, maintaining of product identity, shipping of certified plant material and control of non-conforming products previously addressed in this template. Other aspects of the phytosanitary management system include:

1.) **Internal Audits:** The certification manager must perform, or designate parties to perform, a minimum of one systems audit and three surveillance audits per year. Internal audits are to be conducted as per Section 5.1.4 of the USNCP Standard.

The facility’s USNCP Manual must describe procedures for:

a. Conducting internal audits according to the frequency specified in the USNCP Standard
b. Preparing an internal audit report within two weeks of the audit
c. Designating responsible staff member(s) to conduct the audits
d. Generating corrective action requests for each non-conformance identified and classifying each non-conformance as critical, major or minor
e. Completing corrective actions in a timely fashion and preventing reoccurrences of non-conformances
f. Notifying USDA and the State or County Department of Agriculture when any critical non-conformance is present or suspected in the facility or in product purchased or sold by the facility

2.) **Records Management** – Access to USNCP records should be restricted to responsible parties. Records must be maintained for a minimum of three years, regardless of the current status or participation of the facility in the USNCP.

The USNCP Manual must include:

a. Names, titles and responsibilities of persons who will be able to make alterations to records
b. Procedures for maintaining all documents, reports and records associated with the USNCP program for three years, regardless of the facility’s status or participation in the USNCP
c. Procedures to ensure the most up-to-date versions of the following reference documents are readily available to all individuals implementing the USNCP:
   - CFIA Import Policy Directives
   - USDA 7 CFR 319.37 and Plant Protection Act of 2000
   - USDA and CFIA Regulated Plant Pest Lists
   - USNCP Standards
   - Certified Facility’s USNCP Manual
   - Any pertinent local or federal pest regulations

3.) **Record of USNCP Manual Changes** – A record of all changes to the USNCP Manual, such as revisions to the Appendixes, must be maintained, along with a copy of the USNCP Manual in its original form. All changes must be approved by APHIS prior to implementation.
APPENDICES

Following are items that may be better addressed in the form of appendices. In cases where forms are supplied, forms must be identified in such a manner that their purpose is clear. Each appendix must be clearly labeled. In some cases, use of an introductory page may be necessary for clarity. Suggested titles follow. Each title would be a separate appendix. Additional appendices may be necessary depending on the facility’s operations.

Pest Management Plan

Aspects of the facility’s Pest Management Plan not included elsewhere in the manual, including processes designed to eradicate, control or suppress pest populations to a level that meets the phytosanitary standard.

Identification for Unknown Pest and Disease

A sample of forms used to submit unknown pests or diseases for identification.

Pest Treatment

Details of the treatment process followed when pests are found, such as:

- Pest Identification
- Treatment: chemical application or release of biological control agents
- Disposal of product that cannot be treated successfully
- Re-inspection for the identified pest within a specified time frame
- Re-treatment if necessary. If treatments are unsuccessful, specify what will be done with the infested/infected plants.

Pest Treatment Records

An example of a treatment record form/log and any other forms used by the facility to order treatments and verify the efficacy of treatments used.

Inspection Document

Examples of the forms used to record inspections of incoming plant material, plant material during production, and plant material being shipped. Inspection documents should include:

- Type and quantity of plant material inspected
- Origin of plant material
- Type of inspection
- Date of inspection
- Name of inspector
- Pest finds
- Method of control used
• Treatment process
• Verification of efficacy of treatment

**Managerial and Staff Responsibility for the USNCP Program**

• List of managerial personnel with names, respective duties and chain of reporting, if applicable
• Designation of Certification Manager and Pest Control Manager by name and title at the facility
• List of staff with responsibilities related to the USNCP including names, titles, and specific duties
• Alternatives names must be specified for each listed position

**Seasonal Employees**

A current list of seasonal employees who have responsibilities for this program

**Restricted Products**

• List of plants grown by the nursery or brought in from outside sources that are prohibited for export to Canada under the USNCP
• Description of a system which will automatically identify those plants and prohibit their inclusion in shipments for export to Canada under the USNCP

**Suppliers/Sources of New Plant Material**

• List of suppliers for plants bought for resale and propagation, including contact information
• List of suppliers, including contact information, of plants which are bought for propagation
• Countries of origin for foreign origin plant material

**Phytosanitary Certification Procedure**

Documentation of the procedure followed to obtain a phytosanitary certificate for each shipment including:
• Notifying APHIS or State Department of Agriculture that phytosanitary certification is required.
• Supplying APHIS or State Department of Agriculture with the required documentation by the certified facility
• Obtaining phytosanitary certificate from APHIS or the State Department of Agriculture
• Preparing and providing documentation packet for border clearance

Nurseries that have successfully completed their first year of participation will be authorized to issue their own phytosanitary certificates in PCIT. Nurseries should add information on who will be responsible for issuing the USNCP certificates in PCIT and how they will keep track of all phytos issued using this system.
Export of Non-Prohibited Plant Material Which is not Eligible for the USNCP

A description of the process which would be followed for the export of plant material which is allowed to be exported to Canada but which is not eligible for export under the USNCP. For practical purposes, this would be a description of the steps taken to obtain traditional phytosanitary export inspection/certification.

USDA, APHIS, PPQ Standards for Phytosanitary Measures

A description of where the USNCP Standards for Phytosanitary Measures are kept at the facility. In addition, the person responsible for ensuring that the Standard is current and available to employees should be listed.

Software Tracking of Plant Material (if applicable)

A description of software tracking in place at the facility for plant material (if applicable).

Facility Map

- A map of the nursery facility which identifies all locations of the nursery specifically referred to in the facility’s USNCP Manual
- An illustration of the flow of plant material through the certified facility

Internal Audits

- An example of the internal audit checklist
- An example of a corrective action request

Pest Control Modules

- Any modules written to address the detection and control of specific regulated pests
This appendix describes the procedures and criteria that APHIS should use to review facility applications, evaluate USNCP Manuals, and approve facilities to participate in the USNCP. In addition, it outlines how audits must be conducted at facilities certified under the USNCP and defines the responsible parties.

APHIS Regional Trade Program Managers are responsible for the delivery of the USNCP within their respective regions. To ensure consistency across the program, audit inspections will be conducted in accordance with the specifications outlined in this appendix. The process by which such audits are conducted should be complimentary to the requirements of this Standard.

I. Facility Approval Process

A. Application Process/Review of Application Forms

Eligible applicants are nurseries and greenhouses located in the United States. In situations where an applicant has distinct separate facilities, each facility will require a separate USNCP manual and a separate application form. A separate facility is one that is under different management and/or is under an autonomous management structure. Contract growers should also be evaluated using these criteria and the APHIS Accreditation Manager and Regional Trade Program Manager will make the final determination as to their status as a facility.

Applicants will provide the State Plant Health Director, or their designee, with copies of their application (Appendix 3) and USNCP Manual. The application and the USNCP Manual will be forwarded to the Regional Trade Program Manager and National Accreditation Manager.

The Regional Trade Program Manager or designee will review the Application For Designation in the United States Nursery Certification Program (Appendix 3) for completion and to ensure that the facility meets the participation conditions described in Section 3.1.1 of the USNCP Standard. Once the application has been reviewed for basic eligibility, copies of the application and USNCP Manual will be supplied to the State and/or County Department of Agriculture and the National Accreditation Manager. The facility will have 120 days from submission of their application to submit their USNCP Manual for review. The facility can apply for one extension of 60 days.

B. Review of the USNCP Manual

Once the USNCP Manual is submitted, APHIS, in conjunction with the State and/or County Departments of Agriculture, will establish a manual review group. The group will review the facility’s USNCP Manual to ensure that it contains all the required elements outlined in Section 5.0 and is sufficient to meet all other requirements of this standard. Appendix 4 outlines components which must be addressed in the USNCP Manual and establishes a preferred order of presentation for those components. Addendum 1 contains a checklist that should be used as a tool for evaluating the USNCP Manual. APHIS may require the facility to revise or rewrite their USNCP Manual prior to proceeding to the next step in the approval process. The review team will communicate their findings to the Regional Program Manager and the National Accreditation Manager (or their designees). The National Accreditation Manager will have the final authority.
for approving the USNCP Manual. Once APHIS has approved the USNCP Manual, the facility will move to the next phase of the approval process, the Facility Evaluation. The Regional Program Manager will complete the relevant portion of the APHIS Application For Designation in the United States Nursery Certification Program and forward the application to the National Accreditation Manager.

C. Facility Evaluation

Once the application and the USNCP Manual have been approved, an audit team will be established to carry out a facility evaluation (Addendum 2). The audit team will consist of APHIS and State or County inspectors. During the pilot program, APHIS personnel will have the responsibility of functioning as the lead auditors and, as such, will be responsible for the preparation of the facility evaluation/audit report.

The purpose of the facility evaluation is to determine whether the facility has the infrastructure and staff in place to successfully implement the phytosanitary management system outlined in its USNCP Manual and to meet the requirements of the USNCP. The Facility Evaluation must be carried out as described under APHIS Audits in Section II of this appendix and a copy of the Facility Evaluation/Audit Report must be submitted to the Regional Program Manager, National Accreditation Manager, and the facility within 21 days of the evaluation. If any discrepancies are noted or changes mandated as a result of the initial facility evaluation, the nursery will be notified at the time of the closing meeting. A return visit to the facility might be necessary in order to verify compliance, prior to recommendation for approval.

D. Registration

Once the National Accreditation Manager has reviewed the Audit Report from the facility evaluation and is satisfied that the facility has the capacity to effectively implement all the procedures described in their USNCP Manual, the National Accreditation Manager will send the facility an Accreditation Letter and assign the facility a unique identification number. At that time, the facility can be considered to be a Certified Facility.

The State Plant Health Director responsible for the state in which the newly certified facility is located will be notified of the facility’s certified status by the National Accreditation Manager and will add the facility to the list of certified facilities in that state.

II. APHIS External Audits

The Regional Program Manager, or designee, is responsible for the implementation and delivery of USNCP external audits within his/her respective regions. The Regional Program Manager will designate a Lead Auditor who is responsible for selecting, or designating the selection of, the other audit team members. The composition of the audit team should be changed for each audit and consist of APHIS personnel (one of whom will serve as lead auditor) and personnel from State and/or County Departments of Agriculture. The audit team should make every effort possible to respect the rules, regulations, and customs of the Certified Facility.

For both systems audits and surveillance audits, the audit team must consist of a Lead Auditor and one or more Audit Team Members, depending on the size of the facility. The minimum
requirements for each of these roles are described below:

The Lead Auditor for Systems Audits and Facility Evaluations must:

- Be a designated by the Regional Program Manager
- Have successfully completed an APHIS approved Lead Auditor training course
- Have successfully completed the APHIS Understanding Audit course; and
- Have participated previously as an auditor in Plant Health audits.

The Lead Auditor for Surveillance Audits must:

- Be a designated by the Regional Program Manager
- Have successfully completed the APHIS Understanding Audit course or an approved Lead Auditor training course; and
- Have participated as an auditor previously in Plant Health audits.

An Audit Team Member must:

- Be an APHIS designated Federal, State or County official;
- Have successfully completed the APHIS Understanding Audit course, or an APHIS approved Lead Auditor Course; and
- Have a minimum of one year experience in the delivery of Plant Health programs.

A. Audit Preparation

The lead auditor must identify members of the audit team and contact the Certified Facility to confirm the audit appointment. The lead auditor should convey APHIS’ expectations for the audit, including: what facility staff needs to be available for the audit, office space for the audit, and the purpose and scope of the audit. The lead auditor must also ensure that he/she has the most recent copy of the Certified Facility’s USNCP Manual, previous audit reports, reference materials, copies of relevant directives, and any other necessary documentation. Additional information on APHIS audits of the USNCP can be found in Section 3.4 of this Standard.


The audit inspection team must conduct a thorough review of changes to the facility's USNCP Manual, previous audit reports, and CARs.

C. Planning the Audit

Prior to the audit, the lead auditor must develop a specific audit plan outlining areas to focus on. A checklist for an audit plan is found in Addendum 1 The focus of the audit will be determined by taking into account previous audits and facility performance between audits. In addition, the audit team must meet prior to the audit to discuss the purpose and scope of the audit, review the audit checklist (Addendums 2 or 3), review previous audit reports, and assign tasks.
D. Opening Meeting

The lead auditor must arrange an opening meeting of the audit inspection team with the key senior management, the Certification Manager, the Pest Control Manager, and any other relevant staff of the participating facility. The purpose of the meeting is to discuss audit criteria, availability of staff, method of performing the audit, method of handling any non-conformances found, details of the closing meeting, and the distribution of the audit report. A checklist for this meeting is found in Addendum 5.

E. Auditing

Audit team members must record their observations and findings during the audit. The audit checklists, such as those in Addendums 2 and 3 of this Standard should be used to ensure that the audit is carried out systematically and objectively, but auditors are encouraged to ask questions not included on the checklist. Audit records must include the following information:

- Date
- Names of all the members of the audit team
- Name and address of the facility
- Areas of the facility audited
- Observations and findings of the audit
- Estimated dates of future audits
- Other comments or observations
- References to any CARs

1. Systems Audits and Facility Evaluations

The systems audit must be conducted by means of staff interviews, observation of activities, examination of documents and records, examination of the USNCP Manual, and confirmation of the facility’s ability to carry out the Phytosanitary Management System as described in the USNCP Manual. The audit team must obtain sufficient objective evidence to:

- Assess the adequacy and effectiveness of the Phytosanitary Management System in meeting the requirements specified in the Standards for Phytosanitary Measures of the USNCP, CFIA import requirements for nursery stock, and APHIS domestic movement requirements;
- Determine whether required supporting documentation is sufficient, current and readily available to staff;
- Determine that work is being performed in accordance with the procedures specified in the USNCP Manual and appropriate records are being kept;
- Evaluate whether procedures in place are adequate to ensure pest problems are quickly
identified and appropriate actions are taken; and

- Verify the country of origin of plant material shipped under the USNCP.

2. Surveillance Audits

Surveillance audits must be conducted by means of staff interviews, observations of activities, examination of documents and records, monitoring equipment and sampling techniques, making selective spot inspections of plant material, and other activities as deemed necessary by the audit team. The audit team must obtain sufficient objective evidence to verify:

- Internal audits are performed, CARs are generated, and corrective actions completed;
- Plant material within the facility has remained free of all regulated pests and practically free of all other pests;
- Plant material shipped under the USNCP meets the eligibility, sourcing, and country of origin requirements specified in the Standards for Phytosanitary Measures of the United States Nursery Certification Program;
- Adequate records and documents are maintained.

F. APHIS Audit Team Meeting/Audit Review

The audit team must meet prior to the closing meeting to review the audit findings and evaluate any non-conformances that are detected (Appendix 7). All findings of non-conformance must be recorded onto USNCP Corrective Action Request (CAR) forms (Appendix 8). The audit team must assess the current status of the facility and determine if the facility status will change as a result of the findings of the audit and when the next audit will be conducted. Please refer to Section 3.5 of the Standard for information on facility status and frequency of audits.

G. The Closing Meeting

The Certification Manager and the Pest Control Manager must meet with the APHIS audit team (after the internal audit team meeting) to review the audit findings, discuss any non-conformances, and decide upon an action plan for correction. A checklist for this meeting is found in Addendum 6. The lead auditor must inform the Certification Manager and senior management of any changes in the facility status at the closing meeting. In addition, any critical non-conformances must be reported, resulting in immediate suspension of the facility from the USNCP (Section 3.5.3).

If the facility is to be suspended from the USNCP as a result of findings during the audit, the lead auditor must verbally inform the Certification Manager of the suspension at the closing meeting and must collect all Phytosanitary Certificates.

The lead auditor must notify the Regional Program Manager and the National Accreditation Manager in writing of the suspension. The State Plant Health Director, or designee, must review and sign the audit report that describes the non-conformances that have lead to the suspension and forward this document to the Regional Program Manager. The Regional Program Manager will notify the National Accreditation Manager who must notify the facility in writing of their suspension.
H. Audit Report

The lead auditor is generally responsible for producing an Audit Report within twenty one (21) days of the audit. If the facility is moved to conditional status, or is suspended from the USNCP, a signed report must be produced within five (5) working days of the audit. Addendum 7 contains a checklist that is designed to facilitate the production of an Audit Report. The lead auditor must distribute a final copy of the Audit Report along with a cover letter to the Certification Manager at the Certified Production Facility, audit team, State or County Department of Agriculture, State Plant Health Director, Regional Program Manager, Trade Director for Canada, and National Accreditation Manager.
**APPENDIX 7: CLASSIFICATION OF USNCP NON-CONFORMANCES**

**Critical Non-Conformance**

A critical non-conformance is any single finding that reveals that the integrity of the USNCP is jeopardized. Phytosanitary Certificates cannot be issued because this non-conformance violates the integrity of the certificate. The facility must be immediately suspended from the USNCP. The following list provides examples of critical non-conformances, but it is not comprehensive.

- Detection of pests of quarantine significance to Canada or the United States on plant material that has been shipped by the certified facility.
- Failure to properly identify an organism as a regulated pest in the nursery or seek competent assistance with the identification.
- Failure to undertake required laboratory tests or analysis.
- Failure to carry out control measures at the facility for pests of quarantine significance to the United States or Canada.
- Failure to notify APHIS and the State or County Department of Agriculture of the presence of regulated pests at the facility or on product shipped to or from the facility.
- Failure to observe Canadian or provincial plant health requirements.
- Export of ineligible plant taxa or plants not meeting CFIA requirements.
- Failure to list the scientific name of all the plants on USNCP certification documents.
- Failure to keep consistent, accurate pest management records, as specified in the USNCP Manual.
- Failure to keep consistent accurate records of country of origin.
- Failure to undertake ordered corrective action(s).
- Failure to follow treatment actions ordered by the Certification Manager, APHIS, or State or County Departments of Agriculture.
- Failure to perform internal audits as required.
- Failure of the Certified Facility to provide sufficient evidence that plant materials obtained from external sources meets the requirements for incoming plant material as described in their USNCP Standard.
- Certified Facility is operating without a Certification Manager or Pest Control Manager meeting the qualifications set out in Appendix 4.
- Failure to have a Pest Management Plan in place that satisfies the requirements of the USNCP.
- Modification of their USNCP Manual or phytosanitary management system without prior approval from APHIS.
- Failure to examine incoming plant material prior to moving it into shipping/production areas.
- Failure to have systems in place to fulfill the requirements of the USNCP and to verify compliance.
___ Failure to have sufficient, adequately trained staff in place to meet the requirements of the USNCP.
___ More than two major non-conformances are detected at a Certified Facility during a single audit.

**Major Non-Conformance**

A major non-conformance is any single, isolated incident of non-conformance that has no direct impact on the integrity of the product provided corrective actions are completed within the time frame specified by the lead auditor. Should the facility fail to complete the corrective action in the specified time frame, the non-conformance becomes a critical non-conformance and the facility will be suspended from the USNCP. If more than two major non-conformances are detected during a single audit, the non-conformance is considered a critical non-conformance and the facility will be suspended from the USNCP. The following list provides examples of major non-conformances, but it is not comprehensive.

___ Failure to notify APHIS when the Certification Manager changes.
___ Failure to have a designated backup for the Certification Manager and Pest Control Manager.
___ Failure to maintain complete reports of the shipping inspection of plant material.
___ Failure to keep nursery stock that has been examined for export separate from other plant material that has not been examined.
___ Failure to notify APHIS of a change in sources of re-sale or propagative stock.
___ Failure to undertake corrective actions ordered by the Certification Manager in a timely manner.
___ Failure to provide staff and contractors access to documents as specified in Section 5.1.6.
___ Failure to prevent build-up of non-regulated plant pest populations.
___ Failure to observe good facility management practices with respect to sanitation.
___ Failure to maintain records as specified in USNCP Manual.
___ Failure of the Certification Manager and Pest Control Manager to obtain additional relevant training each year.
___ Failure to maintain training records for staff involved in implementing the USNCP
___ Failure to maintain an up-to-date list of all employees involved in implementing the USNCP.
___ Failure to examine plant material prior to export.
___ Failure to consistently sign and date reports or records.
___ More than three minor non-conformances are detected at a Certified Facility during a single audit.

**Minor Non-Conformance**

Minor non-conformances are those that do not immediately or significantly affect the status of the product or the integrity of the Phytosanitary Certificate, but could lead to a major non-conformance if not addressed. The designated facility must take remedial action before the next
audit, or within the time frame specified by the lead auditor. If more than three minor non-conformances are detected during the inspection, the classification of the non-conformance is changed to a major. (e.g. Five minor non-conformances are equal to one major non-conformance and one minor non-conformance, whereas eight minor non-conformances are equal to two major non-conformances and results in suspension of the facility). The following list provides examples of minor non-conformances, but is not comprehensive.

___ Failure to notify APHIS of changes to plant product source lists.
___ Failure to adequately separate stock infested with non-regulated plant pests from other stock.
___ Failure to effectively dispose of products contaminated by non-regulated plant pests.
___ Failure to detect low level populations of non-regulated pests.
___ Failure to inform APHIS of any changes to business practices as outlined in the USNCP Manual.
## APPENDIX 8: UNITED STATES NURSERY CERTIFICATION PROGRAM CORRECTIVE ACTION REQUEST

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### Description of non-conformance:

Signature of Auditor: ______________ Date Issued: ______________

### Corrective Action:

Facility Representative: ______________ Date for Completion: ______________

Corrective Action Acceptable: __ yes __ no

Follow-up Comments:

### CAR Closed

Signature of Auditor: ______________ Date: ______________

### NOTE:

**Critical** - When an audit reveals that the integrity of the program is in jeopardy the non-conformance is **Critical (Cr)**. The designated facility will be suspended from the program until remedial action has been taken to the satisfaction of APHIS.

**Major** - When an audit reveals an isolated incident having no direct impact on the integrity of the product the non-conformance will be rated as **Major (Ma)**. The designated facility must take remedial action within the time frame specified by an inspector which shall not exceed 2 weeks. Should the facility fail to complete the corrective action in the specified time frame, the facility will be suspended. If more than two **Major** non-conformances are detected during the inspection, the classification is changed to **Critical**.

**Minor** - When an external audit reveals an incident which does not immediately and/or significantly affect the integrity of the program or product, the non-conformance is **Minor (Mi)**. The designated facility must take remedial action within the time frame agreed to by the inspector. If more than three **Minor** non-conformances are detected during the inspection, the classification is changed to **Major**.
# APPENDIX 9: UNITED STATES NURSERY CERTIFICATION PROGRAM
## OBSERVATION REPORT

<table>
<thead>
<tr>
<th>Observation #</th>
<th>Facility Name</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Facility Location</th>
<th>Date</th>
<th>Certification Manager / Internal Auditor</th>
<th>APHIS Auditor</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>External Audit ___</th>
<th>Internal Audit ___</th>
<th>Suggestion for Improvement ___</th>
<th>Observation of good Practices ___</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

## Observations:

Signature of Auditor: ______________ Date Issued: ______________

## Follow-up Comments:

Suggestion Implemented: ___ yes ___ no

Observation Closed ___ Signature of Auditor: ______________ Date: ______________
The USNCP Manual must describe the procedures implemented by the facility to ensure compliance with the requirements of the USNCP standard. The USNCP Manual consists of a general overview of the facility and detailed information on its implementation of the USNCP. It has two key components: the Phytosanitary Management System and the Pest Management Plan. Please refer to Section 5.0 of this directive for additional information. The following checklist is designed to be a guide for APHIS staff evaluating USNCP Manuals.

### I. General Requirements

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The USNCP Manual must be type written, dated and signed. Electronic submission of the document is preferred.</td>
</tr>
<tr>
<td></td>
<td>The title page which includes the name and address of the facility, the date, and the name and contact information of the person(s) that prepared the document.</td>
</tr>
<tr>
<td></td>
<td>An amendment sheet that provides space to document any additions, omissions or changes to the document, the date they are made and who authorized the changes.</td>
</tr>
</tbody>
</table>

### II. Administration

#### 1. Management Commitment

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>A statement of commitment to the USNCP by management of the facility.</td>
</tr>
<tr>
<td></td>
<td>List of facility management names and titles.</td>
</tr>
</tbody>
</table>

#### 2. Training

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Description of training covering operation aspects of USNCP includes type of training, frequency, duration and intended audience</td>
</tr>
<tr>
<td>Description of pest detection/identification training including</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Methods of pest detection (for both general and specific pests of concern)</td>
</tr>
<tr>
<td></td>
<td>Process of pest submission for Identification</td>
</tr>
<tr>
<td></td>
<td>Inspection of incoming plants</td>
</tr>
<tr>
<td></td>
<td>Inspection of propagated material and/or stock plants</td>
</tr>
<tr>
<td></td>
<td>Inspection of material to be shipped, including specific inspection requirements for specific plant categories</td>
</tr>
<tr>
<td></td>
<td>General standards for all plants – how to handle pest finds, reporting of pest finds, recording of treatments/actions</td>
</tr>
<tr>
<td></td>
<td>Type of training, frequency, duration and intended audience</td>
</tr>
<tr>
<td></td>
<td>Training on records management</td>
</tr>
<tr>
<td>Record of staff training including:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Training schedule</td>
</tr>
<tr>
<td></td>
<td>Type of training received</td>
</tr>
<tr>
<td></td>
<td>Date of training</td>
</tr>
</tbody>
</table>
### 3. Staff Responsibilities

- Designation of the Certification Manager and Pest Control Manager
  - Designation of CM and PCM alternates

Name, title, qualifications, specific duties and responsibilities of all staff involved in implementing the USNCP, including:
- Certification Manager
- Pest Control Manager or Advisor
- Grower
- Pesticide Applicator
- Shipping Manager
- Dispatcher
- Other

### III. Pest Management Plan

#### 1. Incoming Material

- Identification of all sources of new plant material
  - List of suppliers and origin included for offsite sources

- Measures to maintain documentation supporting the origin of all plant material

- Measures to comply with pest-specific, origin-specific, or commodity specific phytosanitary requirements of USDA and CFIA

- Procedures for maintaining product identity within the facility from receiving until shipping

- Measures to ensure sourced plant material is free of pests of concern and the risk of introducing and transmitting plant pests is mitigated

- Description of a record-keeping system that verifies all plant material certified under the USNCP meets the standards for sourcing as outlined in Section 2.2 of this Standard

- Procedures to ensure that new plant material remains physically separated from other plant material until examination is completed and material is found free of pests
<table>
<thead>
<tr>
<th>Procedures for inspection of plants received at the facility including:</th>
</tr>
</thead>
<tbody>
<tr>
<td>_ Titles of staff positions responsible for conducting inspections</td>
</tr>
<tr>
<td>Procedures to be followed if quarantine, regulated, or non-regulated plant pests are found during the receiving inspection</td>
</tr>
<tr>
<td>Description of inspection results, including</td>
</tr>
<tr>
<td>_ Type (genus and species/cultivar)</td>
</tr>
<tr>
<td>_ Quantity of material inspected</td>
</tr>
<tr>
<td>_ Country or state of origin</td>
</tr>
<tr>
<td>_ Date of inspection</td>
</tr>
<tr>
<td>_ Name of person conducting inspection</td>
</tr>
<tr>
<td>_ Pests/diseases detected</td>
</tr>
<tr>
<td>_ Methods of control used</td>
</tr>
<tr>
<td>Example of incoming inspection form in a referenced appendix</td>
</tr>
</tbody>
</table>

2. **Production Process**

Description of the physical layout of the facility and the flow of plant material through the facility

Labeled map of the facility in a referenced appendix

Diagram of the flow of material through the facility in a referenced appendix

Procedures to maintain product identity within the facility

Procedures to eradicate, control, or suppress pest populations to a level that meets the phytosanitary standard

Description of methods, frequency, and intensity for inspection of all plant material in the facility

Procedures for documenting inspection results, including:

- Type (genus and species/cultivar) of material
- Quantity of material inspected
- Location of material inspected
- Date of inspection
- Name of person conducting inspection
- Pests/diseases detected
- Corrective actions taken
- Methods to evaluate the efficacy of control measures
Description of procedures to be followed if pests are found including:
- Identification of unknown pests
- Response to non-regulated pest find
- Response to quarantine or regulated pest find
- Notification of the certification manager immediately in the event of a suspected quarantine or regulated pest find
- Notification of the USDA and State and/or County Departments of Agriculture in the event of a quarantine or regulated pest find
- Treatment or disposal of plant material contaminated by quarantine or regulated plant pests

Procedures for maintaining records of inspections, pest finds, pest submissions, pest identifications, and corrective actions

Included in a referenced appendix are examples of:
- Inspection records
- Treatment records
- Pest submission records

In cases where additional pest or commodity specific quarantine requirements apply to the facility or to products produced by the facility:
- Procedures describing how each of the specific quarantine requirements are met
- Name and qualification of any laboratories used to meet testing requirements
- Procedures for maintaining records documenting specific quarantine requirements have been met

3. **Outgoing Materials**

- Procedures for the internal notification process identifying export shipments
- Procedures for handling pests detected during the shipping inspection
- Procedures for maintaining product identity

- Procedures for the inspection of plant material to be exported or shipped from the facility including procedures for inspection of:
  - Foliage and stems
  - Soil and/or roots
  - Packing material and/or shipping containers

- Procedures for documenting the shipping inspection including:
  - Type (genus and species/cultivar) of material
  - Quantity of material inspected
  - Origin of plant material
  - Date of inspection
  - Name of person conducting the inspection
  - Pests detected and methods used to control pests
| Procedures for maintaining records of shipping inspections, pest finds, pest submissions, pest identifications, and corrective actions taken |
| Examples of shipping inspection records, corrective actions/treatment records, and pest submission records in a referenced appendix |
| Procedures for tracing product backwards and forwards from the facility |
| Procedures to ensure non-conforming product is not certified under the USNCP and does not contaminate other products |
| Procedures for handling, storing, and delivering product to ensure it has been examined and found free of pests and is not contaminated by pests prior to receipt by the consignee |
| Procedures to ensure all pest and commodity specific requirements are met prior to shipping |
| Description of record keeping procedures which verify all plant material shipped under the USNCP meets the requirements of Section 2.2 (Sourcing of Plant Material), Section 2.3 (Eligible Plant Taxa) and Section 2.4 (Propagative Origin) of the USNCP Standard |

### III. Phytosanitary Management System

#### 1. Internal Audits

| Procedures to ensure internal audits are conducted according to the frequency specified in the USNCP Standard |
| Procedures in place to ensure the audit report is completed within two weeks of the audit |
| Procedures to maintain detailed records of all non-conformances, corrective actions, audits, and follow-up examinations to verify compliance with this Standard |
| Procedures for conducting internal audits including:  
  - Designation of responsible staff member  
  - Procedures to ensure an auditor does not audit his/her own work |
<p>| Examples of the internal audit reports and checklists in a referenced appendix |
| Procedures to generate Corrective Action Requests for each non-conformance that is detected by the Certified Production Facility |
| Procedures to classify each non-conformance as critical, major, or minor in nature |
| Procedures to complete corrective actions in a timely fashion |
| Procedures to prevent recurrences of non-conformances, including amendments to the USNCP Manual |</p>
<table>
<thead>
<tr>
<th></th>
<th>Procedures used to immediately notify APHIS and the State and/or County Departments of Agriculture regarding the presence, or suspected presence, of any critical non-conformance in the facility or on product purchased or sold by the facility</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. <strong>Records Management</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>List of the names, titles, and responsibilities of persons who have access to the records for alteration purposes</td>
</tr>
<tr>
<td></td>
<td>Procedures for maintaining all documents, reports, and records associated with the USNCP program for three years, regardless of the facility’s status or participation in the USNCP</td>
</tr>
<tr>
<td></td>
<td>Procedures to ensure the most up-to-date versions of the following reference documents are readily available to all individuals implementing the USNCP:</td>
</tr>
<tr>
<td></td>
<td>- CFIA Import Policy Directives</td>
</tr>
<tr>
<td></td>
<td>- USDA 7 CFR 319.37 and Plant Protection Act of 2000</td>
</tr>
<tr>
<td></td>
<td>- Pertinent federal regulations for regulated pests</td>
</tr>
<tr>
<td></td>
<td>- USDA and CFIA Regulated Plant Pest Lists</td>
</tr>
<tr>
<td></td>
<td>- Copies of the USNCP Standard</td>
</tr>
<tr>
<td></td>
<td>- Copies of the Certified Facility’s USNCP Manual</td>
</tr>
<tr>
<td>3. <strong>Record of USNCP Manual Changes</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Procedures to maintain a record of all changes to the USNCP Manual along with a copy of the USNCP Manual in its original form</td>
</tr>
<tr>
<td>IV. <strong>Appendices</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>All appendices are clearly labeled and easily identified</td>
</tr>
<tr>
<td></td>
<td><strong>Pest Management Plan</strong></td>
</tr>
<tr>
<td></td>
<td>- Written plan describing additional aspects of the pest management plan not previously described in the USNCP Manual</td>
</tr>
<tr>
<td></td>
<td><strong>Scouting Form</strong></td>
</tr>
<tr>
<td></td>
<td>- An example of the form used to scout for pests during the production cycle</td>
</tr>
<tr>
<td></td>
<td><strong>Identification Form for Unknown Pests and Diseases</strong></td>
</tr>
<tr>
<td></td>
<td>- A clearly labeled example of the form submitted with unknown pests and diseases</td>
</tr>
</tbody>
</table>
### Pest Treatment Procedure
- Treatment process followed when pests are found
- Process followed to identify unknown pests
- Description of treatment: chemical application, release of biological control agents, or disposal method of product which can not be treated
- Re-inspection requirements, including time frame, for identified pests
- Conditions for re-treatment, if necessary
- Procedure if treatments are unsuccessful including disposition of infested/infected plants
- Procedure for containing infestation of pest or disease

### Pest Treatment Records
- Example of pest treatment record clearly labeled

### Inspection Documents
- Example of an incoming material inspection form which contains:
  - Type (genus and species/cultivar) of material
  - Quantity of material inspected
  - Origin of plant material
  - Type of inspection
  - Date of inspection
  - Name of inspector
  - Pest finds
  - Control method used
  - Pest treatment process
  - Verification of treatment efficacy
- Example of a shipping inspection form which contains:
  - Type (genus and species/cultivar) of material
  - Quantity of material inspected
  - Origin of plant material
  - Type of inspection
  - Date of inspection
  - Name of inspector
  - Pest finds
  - Control method used
  - Pest treatment process
  - Verification of treatment efficacy

### Managerial and Staff Responsibilities
- List of managerial personnel that includes names, duties, and the chain of reporting, if applicable
- Designation of Certification Manager and Pest Control Manager by name and title
- List of staff including, names, titles, specific duties, and responsibilities as related to this program
<table>
<thead>
<tr>
<th><strong>Seasonal Employees</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Includes a current list of seasonal employees who have responsibilities under the USNCP</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Restricted Products</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>List of plants grown by the nursery or brought in from outside sources that are prohibited for export to Canada under the USNCP</td>
</tr>
<tr>
<td>Description of a system which will automatically identify those plants and prohibit their inclusion in shipments for export to Canada under the USNCP</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Suppliers/Sources of New Plant Material</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>List of suppliers, including contact information, for plants bought for resale</td>
</tr>
<tr>
<td>List of suppliers, including contact information, of plants bought for propagation</td>
</tr>
<tr>
<td>Origin of incoming plant material</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Phytosanitary Certification Procedure</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Documentation of the procedure which must be followed to obtain a phytosanitary certificate for each shipment including:</td>
</tr>
<tr>
<td>Notifying APHIS or State Department of Agriculture that a phytosanitary certification is required.</td>
</tr>
<tr>
<td>Supplying APHIS or State Department of Agriculture with the required documentation by the certified facility</td>
</tr>
<tr>
<td>Obtaining phytosanitary certificate from APHIS or the State Department of Agriculture</td>
</tr>
<tr>
<td>Preparing and providing documentation packet for border clearance</td>
</tr>
</tbody>
</table>

Nurseries that have successfully completed their first year of participation will be authorized to issue their own phytosanitary certificates in PCIT. Nurseries should add information on who will be responsible for issuing the USNCP certificates in PCIT and how they will keep track of all phytos issued using this system.

<table>
<thead>
<tr>
<th><strong>Export of Non-Prohibited Plant Material Which Is Not Eligible for the USNCP</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Process followed for the export of plant material which is allowed to be exported to Canada but is <strong>not</strong> eligible for export under the USNCP</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>USDA, APHIS, PPQ Standards for Phytosanitary Measures</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Location of USNCP Standards at the facility</td>
</tr>
<tr>
<td>Designation of staff member responsible for making sure the Standard is current and available to employees involved in the USNCP</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Software Tracking of Plant Material (if applicable)</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Description of software tracking for plant material at the facility (if applicable)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Facility Map</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Map of the nursery facility identifying all locations specifically referred to in the facility’s USNCP Manual</td>
</tr>
<tr>
<td>Map or diagram illustrating the flow of plant material through the facility</td>
</tr>
<tr>
<td><strong>Internal Audit</strong></td>
</tr>
<tr>
<td>--------------------</td>
</tr>
<tr>
<td>Example of an internal audit checklist</td>
</tr>
<tr>
<td>Example of a corrective action request</td>
</tr>
</tbody>
</table>

| **Comments:** |
ADDENDUM 2: USNCP FACILITY EVALUATION CHECKLIST

Pilot Version

Date of Evaluation

/ / 

Type of Evaluation

initial re-instatement (circle one)

Name of Facility


Address of Facility


Facility Site Evaluated


Objective

Initial facility evaluation is required for acceptance into the United States Nursery Certification Program (USNCP). The purpose of the initial facility evaluation is to determine whether the facility has the infrastructure and staff in place that would permit it to successfully implement the phytosanitary management system outlined in its approved USNCP Manual and meet the requirements of the USNCP. Additionally, a facility evaluation is required for re-instatement when a participant is suspended from the program and requests to be recertified. The re-instatement facility evaluation will determine whether the facility has made the required corrections to their operations, USNCP Manual or both. This checklist provides guidelines for the facility evaluation team and is not intended to restrict topics the team can evaluate. The facility evaluation provides an opportunity for the applicant nursery staff to ask questions and obtain clarification on the USNCP.

Scope

All areas of the facility will be physically inspected. The team will verify that the actual nursery operations correspond to the phytosanitary management system described in their USNCP Manual and conform to the requirements of the program. In the case of a re-instatement evaluation, the team will verify that all the required corrections requested by the audit team that suspended the participant have been completed. Required modifications to nursery operations, the USNCP Manual, or both are communicated to the facility’s staff through Corrective Action Requests.

Definitions

USNCP Manual – the Manual which is created by and for each individual nursery which contains the approved systems approach the facility will follow for exporting nursery stock to Canada via the United States Nursery Certification Program (USNCP). The manual is submitted toAPHIS for approval.
**USNCP** – United States Nursery Certification Program – program that utilizes a systems approach for nursery stock for export certification to Canada.

**CITES** – Convention on International Trade in Endangered Species (of wild fauna and flora) – is an international agreement between governments. Its aim is to ensure that international trade in specimens of wild animals and plants does not threaten their survival.

**Note:** Additional definitions are available in the USNCP export production manual.

---

**Lead Evaluator**

_________________________________________________________

**Evaluation Team Members**

________________________________________________________

________________________________________________________

________________________________________________________

**Facility Representative**

________________________________________________________

**Facility Participants**

________________________________________________________

________________________________________________________

________________________________________________________

---

**Reference Documents:**

USNCP Manual

*Pilot Version* USDA APHIS Plant Protection and Quarantine Standards for Phytosanitary Measures

*Plant Protection Act* and Regulations;

Applicable Canadian Food and Inspection Agency Directives
## Evaluation

### Receiving / Shipping Area

<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
<th>Yes</th>
<th>No</th>
<th>Corrective Action Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>The map of the facility in the approved USNCP Manual accurately reflects the actual physical receiving / shipping areas and the flow of plant material through them.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>See comments section</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Plant source / supplier list is available and current.</td>
<td>Available</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>See comments section</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Current</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Propagative origins of all plants are identifiable and traceable.</td>
<td>Identifiable</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>See comments section</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Traceable</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Staff working in these areas can explain and demonstrate the system used to identify and trace the propagative origins of all plants.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>See comments section</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Operational procedures, and record keeping methods for these areas are accurately described and reflected in the approved USNCP Manual.</td>
<td>Receiving</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>See comments section</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Shipping</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>In cases where additional pest or commodity specific quarantine requirements apply to the facility or the products produced, the staff working in these areas can describe how these additional requirements will be met.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>See comments section</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Staff is trained in the use of all forms used for logging inspections; identifying, tracking and treating pests; and taking corrective action.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>See comments section</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Plant material inspection records are available, legible, and completely filled out.</td>
<td>Available</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Legible</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Complete</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>See comments section</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>A procedure is in place for ensuring that USDA / USDA Cooperators are notified immediately of any pest finds of significance, and that it is accurately described and reflected in the approved USNCP Manual.</td>
<td>Procedure in place</td>
<td>□ See comments section</td>
<td>Reflected in manual</td>
</tr>
<tr>
<td>---</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-------------------</td>
<td>------------------------</td>
<td>-------------------</td>
</tr>
<tr>
<td>10</td>
<td>The actual procedures in place to dispose of pest contaminated plant material that has been determined untreatable are accurately described and reflected in the approved USNCP Manual.</td>
<td>Receiving</td>
<td>□ See comments section</td>
<td>Shipping</td>
</tr>
<tr>
<td>11</td>
<td>Shipping records pertaining to customers / consignees are available. (traceability)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>A current list of all the plant species that are shipped by the facility under USNCP is available.</td>
<td>Available</td>
<td>□ See comments section</td>
<td>Current</td>
</tr>
<tr>
<td>13</td>
<td>A current list of the prohibited plants for Canada is available for use by the shipping staff.</td>
<td>Available</td>
<td>□ See comments section</td>
<td>Current</td>
</tr>
<tr>
<td>14</td>
<td>A current list of CITES regulated plants or the CITES website URL is available for use by the shipping staff.</td>
<td>Available</td>
<td></td>
<td>Current</td>
</tr>
<tr>
<td>15</td>
<td>The staff working in the receiving / shipping areas have been trained in their responsibilities for the USNCP.</td>
<td>Receiving</td>
<td>□ See comments section</td>
<td>Shipping</td>
</tr>
<tr>
<td></td>
<td>Actual record keeping and back-up procedures being utilized for these areas are accurately described and reflected in the approved USNCP Manual.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>----------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>Receiving</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ See comments section</td>
<td>Shipping</td>
<td></td>
<td></td>
</tr>
<tr>
<td>17</td>
<td>USNCP records for these areas are located in the facility as described in the approved USNCP Manual.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Receiving</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ See comments section</td>
<td>Shipping</td>
<td></td>
<td></td>
</tr>
<tr>
<td>18</td>
<td>The staff working in these areas understands that USNCP records are required to be backed-up, and maintained for three years.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Receiving</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ See comments section</td>
<td>Shipping</td>
<td></td>
<td></td>
</tr>
<tr>
<td>19</td>
<td>Corrections that were required in these areas for facility <strong>re-instatement</strong> to the program have been completed.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Receiving</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ See comments section</td>
<td>Shipping</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**OTHER AREAS, PROCEDURES, or PRACTICES EVALUATED**

82
<table>
<thead>
<tr>
<th>Item</th>
<th>COMMENTS</th>
<th>(list item # that your comments address)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Receiving / Shipping Area</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Item</td>
<td>Administration / Records</td>
<td>Yes</td>
</tr>
<tr>
<td>------</td>
<td>--------------------------</td>
<td>-----</td>
</tr>
<tr>
<td>1</td>
<td>A current, approved USNCP Manual is available to all staff members. (If hard copy is <strong>NOT</strong> current, check “No” for hard copy and provide comments in comment section)</td>
<td>Hard copy</td>
</tr>
<tr>
<td>2</td>
<td>Manual amendment records are current and complete.</td>
<td>Current</td>
</tr>
<tr>
<td>3</td>
<td>The map of the facility in the approved USNCP Manual accurately reflects the actual physical site.</td>
<td>☐ See comments section</td>
</tr>
<tr>
<td>4</td>
<td>The flow chart of the production system in the USNCP Manual accurately reflects the actual operation of the facility.</td>
<td>☐ See comments section</td>
</tr>
<tr>
<td>5</td>
<td>Plant source / supplier list is available and current.</td>
<td>Available</td>
</tr>
<tr>
<td>6</td>
<td>Propagative origins of all plants are identifiable and traceable throughout the system.</td>
<td>Identifiable</td>
</tr>
<tr>
<td>7</td>
<td>Staff working in administration / record keeping can explain and demonstrate the system used to identify and trace the propagative origins of all plants.</td>
<td>☐ See comments section</td>
</tr>
<tr>
<td>8</td>
<td>In cases where additional pest or commodity specific quarantine requirements apply to the facility or the products produced, the staff working in these areas can describe how these additional requirements will be met.</td>
<td>☐ See comments section</td>
</tr>
<tr>
<td>9</td>
<td>A current list of <strong>prohibited</strong> plants for Canada is available for use by the staff.</td>
<td>Available</td>
</tr>
<tr>
<td></td>
<td>Description</td>
<td>Available</td>
</tr>
<tr>
<td>---</td>
<td>-----------------------------------------------------------------------------</td>
<td>----------</td>
</tr>
<tr>
<td>10</td>
<td>A current list of CITES regulated plants or the CITES website URL is available for use by the shipping staff.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>A current list of all the plant species that are shipped by the facility under USNCP is available.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Staff working in these areas are familiar with all forms used for the USNCP and make them available to the entire nursery staff.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>Training records for staff working in these areas are available, current, and legible.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>Staff working in the administration / record keeping areas have been trained in their responsibilities for the USNCP.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>The staff is aware of the requirement for internal and annual audits, and understands the procedure for completing them as described in the approved USNCP Manual.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>Actual record keeping and back-up procedures being utilized are accurately described and reflected in the approved USNCP Manual.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17</td>
<td>USNCP records and back-up records are located in the facility as described in the approved USNCP Manual.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The staff working in this area understands that USNCP records are required to be backed-up, and maintained for three years.

- See comments section

If applicable, Corrective Action Request records are available, and legible.

- Available
- See comments section
- Legible

Corrections that were required in these areas for facility **re-instatement** to the program have been completed.

- See comments section

**OTHER AREAS, PROCEDURES, or PRACTICES EVALUATED**
<p>| Item | Administration / Records | COMMENTS | (list item # that your comments address) |</p>
<table>
<thead>
<tr>
<th>Item</th>
<th>Propagation / Production</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>The map of the facility in the approved USNCP Manual accurately reflects the actual physical propagation / production areas and flow of plant material through them.</td>
</tr>
<tr>
<td>2</td>
<td>Operational procedures, and record keeping methods for these areas are accurately described and reflected in the approved USNCP Manual.</td>
</tr>
<tr>
<td>3</td>
<td>Propagative origins of all plants are identifiable and traceable throughout the propagation / production process.</td>
</tr>
<tr>
<td>4</td>
<td>Staff working in these areas can explain and demonstrate the system used to identify and trace the propagative origins of all plants.</td>
</tr>
<tr>
<td>5</td>
<td>In cases where additional pest or commodity specific quarantine requirements apply to the facility or the products produced, the staff working in these areas can describe how these additional requirements will be met.</td>
</tr>
<tr>
<td>6</td>
<td>Staff is trained in the use of all forms used for the USNCP relating to these areas.</td>
</tr>
<tr>
<td>7</td>
<td>Staff is aware that a required procedure is in place for ensuring that USDA / USDA Cooperators are notified immediately of any pest finds of significance, and that it is accurately described and reflected in the approved USNCP Manual.</td>
</tr>
<tr>
<td>8</td>
<td>The staff working in the propagation / production areas have been trained in their responsibilities for the USNCP.</td>
</tr>
<tr>
<td></td>
<td>Staff training records for these areas are available, current, and legible.</td>
</tr>
<tr>
<td>---</td>
<td>--------------------------------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>89</td>
<td>☐ See comments section</td>
</tr>
<tr>
<td>9</td>
<td>Actual record keeping and back-up procedures being utilized in these areas are accurately described and reflected in the approved USNCP Manual.</td>
</tr>
<tr>
<td></td>
<td>☐ See comments section</td>
</tr>
<tr>
<td>10</td>
<td>USNCP records for these areas are located in the facility as described in the approved USNCP Manual.</td>
</tr>
<tr>
<td></td>
<td>☐ See comments section</td>
</tr>
<tr>
<td>11</td>
<td>The staff working in these areas understands that USNCP records are required to be maintained and backed-up for three years.</td>
</tr>
<tr>
<td></td>
<td>☐ See comments section</td>
</tr>
<tr>
<td>12</td>
<td>Corrections that were required in these areas for facility re-instatement to the program have been completed.</td>
</tr>
<tr>
<td></td>
<td>☐ See comments section</td>
</tr>
</tbody>
</table>

**OTHER AREAS, PROCEDURES, or PRACTICES EVALUATED**
<table>
<thead>
<tr>
<th>Item</th>
<th>Propagation / Production</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>(list item # that your comments address)</td>
</tr>
<tr>
<td>Item</td>
<td>Scouting / Pest Control</td>
<td>Yes</td>
</tr>
<tr>
<td>------</td>
<td>------------------------</td>
<td>-----</td>
</tr>
<tr>
<td>1</td>
<td>The location of the records for these areas are accurately described in the approved USNCP Manual.</td>
<td>☐ See comments section</td>
</tr>
<tr>
<td>2</td>
<td>Actual operational procedures, and record keeping methods for these areas are described and reflected in the approved USNCP Manual.</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>In cases where additional pest or commodity specific quarantine requirements apply to the facility or the products produced, the staff working in these areas can describe how these additional requirements will be met.</td>
<td>☐ See comments section</td>
</tr>
<tr>
<td>4</td>
<td>Staff is trained in the use of all forms used for logging inspections; identifying, tracking and treating pests; and taking corrective action.</td>
<td>☐ See comments section</td>
</tr>
<tr>
<td>5</td>
<td>A procedure is in place for ensuring that USDA / USDA Cooperators are notified immediately of any pest finds of significance, and that it is accurately described and reflected in the approved USNCP Manual.</td>
<td>☐ See comments section</td>
</tr>
<tr>
<td>6</td>
<td>If applicable, scouting records are available, legible, and completely filled out.</td>
<td>Available</td>
</tr>
<tr>
<td>7</td>
<td>If applicable, pest control application records are available, legible, and completely filled out.</td>
<td>Available</td>
</tr>
<tr>
<td></td>
<td>The actual procedures in place to dispose of pest contaminated plant material that has been determined untreatable are accurately described and reflected in the approved USNCP Manual.</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Propagation</td>
<td></td>
</tr>
<tr>
<td></td>
<td>□ See comments section</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Production</td>
<td></td>
</tr>
<tr>
<td></td>
<td>See comments section</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>The staff working in the scouting / pest control areas have been trained in their responsibilities to USNCP.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>See comments section</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Training records are available, current, and legible.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Available</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Current</td>
<td></td>
</tr>
<tr>
<td></td>
<td>□ See comments section</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Legible</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Actual record keeping and back-up procedures being utilized for these areas are accurately described and reflected in the approved USNCP Manual.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>□ See comments section</td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>USNCP records for these areas are located in the facility as described in the approved USNCP Manual.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>□ See comments section</td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>The staff working in these areas understands that USNCP records are required to be maintained and backed-up for three years.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>□ See comments section</td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>Corrections that were required in these areas for facility <strong>re-instatement</strong> to the program have been completed.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>□ See comments section</td>
<td></td>
</tr>
</tbody>
</table>

**OTHER AREAS, PROCEDURES, or PRACTICES EVALUATED**
<table>
<thead>
<tr>
<th>Item</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scouting / Pest Control</td>
<td>(list item # that your comments address)</td>
</tr>
</tbody>
</table>
ADDENDUM 3: USNCP AUDIT CHECKLIST

Objective
Regular audits are required for participation in the United States Nursery Certification Program (USNCP). The purpose of the audits is to determine whether the facility is implementing the phytosanitary management system and pest management plan outlined in its USNCP Manual. Facilities will be audited against the USNCP Standards for Phytosanitary Measures and the USNCP Manual of the facility.

Scope
This checklist provides guidelines for the audit team and provides a basic framework for audit topics and questions. Interviews with facility staff are an important component of all audits. Audit team members should conduct interviews with facility staff, using mostly open ended questions, in order to determine how to evaluate conformance with the items listed on the audit checklist. To facilitate document review and verify the facility’s ability to maintain the identity of product throughout the nursery, audit team members may consider using a USNCP phytosanitary certificate issued during the period of time being audited as a starting point for their inquiry. In addition to examining documentation, the audit team may observe employees performing tasks required by the USNCP and examine plant material. Auditors should provide any comments in the question box, at the end of the section, or the end of the checklist. Auditors MUST provide explanatory comments for any items for which the facility is found to be in non-conformance (i.e. “NO” is checked for the item on the audit checklist).

Systems Audit: All areas of the facility will be physically inspected. The team will verify that the actual nursery operations correspond to the phytosanitary management system and the pest management plan described in the facility’s USNCP Manual. The audit team will verify that the plan implementation conforms to the requirements of the program. Required modifications to nursery operations, the USNCP Manual, or both are communicated to the facility’s staff through Corrective Action Requests (Appendix 8 USNCP Standards). Audit team members can also issue USNCP Observation Reports (Appendix 9 USNCP Standards) to identify areas of concern which do not warrant a corrective action request, reinforce positive practices, or suggest improvements.

Surveillance Audit: Surveillance audits focus on one or more aspects of the facility’s operation and may include physical verification of the pest management plan through random inspection of plant material. Surveillance Audits provide a continual monitoring and verification of the status of the certified facility’s plant material, records, and administrative procedures to ensure conformity with the USNCP Standards. At least one surveillance audit must be carried out during a period of active plant growth. Corrective Action Requests and Observation Reports are used to communicate necessary changes and suggested improvements.

Definitions

USNCP Manual – a procedural manual developed by each participating facility, which contains the systems approach the facility will follow for exporting nursery stock to Canada via the United States Nursery Certification Program (USNCP). The manual is approved by APHIS prior to the facility’s entry in the USNCP.

USNCP - United States Nursery Certification Program

Reference Documents:

USNCP Manual
Pilot Version USDA APHIS Plant Protection and Quarantine Standards for Phytosanitary Measures
Plant Protection Act and Regulations;
Applicable Canadian Food and Inspection Agency Directives
<table>
<thead>
<tr>
<th>Date (s) of Audit:</th>
<th>Type of Audit:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>□ Surveillance □ Systems</td>
</tr>
</tbody>
</table>

**Area(s) Audited:**
- □ Shipping
- □ Receiving
- □ Administration/Records
- □ Propagation/Production
- □ Scouting/ Pest Control

**Facility Name:**

**Physical Address:**

**Mailing Address:**

**Facility Representative:**

**Contact Number:**

**Email Address:**

**Facility Participants (including designated role in the USNCP):**

**Lead Auditor:**

**Audit Team Members and Affiliation:**
<table>
<thead>
<tr>
<th>Item</th>
<th>Receiving and Shipping</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>The map of the facility in the USNCP Manual accurately reflects the actual physical layout of the receiving and shipping areas and the flow of plant material through them.</td>
<td>Physical layout</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Flow of material</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Operation procedures, and record keeping methods in the receiving and shipping areas are implemented as described in the USNCP Manual.</td>
<td>Receiving</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Shipping</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>USNCP records for shipping and receiving are located in the facility as described in the approved USNCP Manual.</td>
<td>Receiving</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Shipping</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>The staff working in shipping and receiving understands that USNCP records are required to be maintained for three years.</td>
<td>Receiving</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Shipping</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Staff is aware and trained in the use of all forms used for logging inspections; identifying, tracking and treating pests; and taking corrective actions.</td>
<td>Aware</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Trained</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>A procedure is in place to manage pests found during receiving or shipping inspections and is implemented as described in the USNCP Manual.</td>
<td>Procedure in place</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Implemented per USNCP Manual</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>A procedure is in place for ensuring that USDA/State/County Department of Agriculture is notified immediately of any pest finds of significance in the facility or on product purchased or sold by the facility. The procedure is implemented as described in the USNCP Manual.</td>
<td>Procedure in place</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Implemented per USNCP Manual</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Procedures to dispose of pest-contaminated plant material that has been determined to be untreatable are implemented as described in the USNCP Manual.</td>
<td>Receiving</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Shipping</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Procedures are in place to ensure that facility staff immediately notify the Production Manager of any product found not to conform to the requirements of the USNCP and the procedures are implemented as described in the USNCP Manual.</td>
<td>Procedure in place</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Implemented per USNCP Manual</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Receiving</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>10</td>
<td>Plant source / supplier list is available and current.</td>
<td>Available</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Current</td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>A current list of all plant species that are received by the facility is available.</td>
<td>Available</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Current</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Documents and invoices indicating the source, type, quantity, and dates of receipt are available to the audit team.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>Origin of all plant material brought into the nursery is identifiable and traceable.</td>
<td>Identifiable</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Traceable</td>
<td></td>
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</tr>
<tr>
<td>14</td>
<td>New plant material remains physically separated from other plant material at the nursery until an examination of the material is completed and the material is found to be free of plant pests.</td>
<td></td>
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<tr>
<td>15</td>
<td>Measures are in place at the nursery to mitigate the risk of introducing plant pests with incoming plant material. For example, is incoming plant material isolated from production stock? How long is it isolated? Where?</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Shipping</strong></th>
<th></th>
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</thead>
<tbody>
<tr>
<td>16</td>
<td>A current list of all the plant species that are shipped by the facility under USNCP is available.</td>
<td>Available</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>Current</td>
<td></td>
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<tr>
<td>17</td>
<td>A current list of the <strong>prohibited</strong> plants for Canada is available for use by the shipping staff.</td>
<td>Available</td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td>Current</td>
<td></td>
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<tr>
<td>18</td>
<td>A current list of CITES regulated plants or the CITES website URL is available for use by the shipping staff.</td>
<td>Available</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>Current</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>Website</td>
<td></td>
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<tr>
<td>19</td>
<td>A system is in place to ensure that only eligible plant material is shipped under the USNCP.</td>
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<tr>
<td><strong>20</strong></td>
<td>The Production Manager can demonstrate that all pest and commodity specific requirements are met prior to shipping.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td><strong>21</strong></td>
<td>A list of plants shipped by the facility that have specific requirements and a description of those requirements are readily available. This higher risk plant material might include plants that are hosts to specific pests of concern, plants imported from outside continental North America, plants exported to Canada that have additional certification standards, or stock plants that are held for more than a growing season.</td>
<td></td>
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</tr>
<tr>
<td><strong>22</strong></td>
<td>System for maintaining records is sufficient to track the content, destination, and customers/consignees for all shipments.</td>
<td>Content Destination Customer</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>23</strong></td>
<td>The facility has a system in place to ensure that all shipments certified under the USNCP are accompanied by the appropriate documentation.</td>
<td></td>
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</tr>
<tr>
<td><strong>24</strong></td>
<td>Documentation accompanying all USNCP shipments indicates the scientific name of all plants in the shipment.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td><strong>25</strong></td>
<td>A procedure is in place to ensure that outgoing plant material is examined not more than one (1) week prior to shipping and the procedure is implemented as described in the USNCP Manual.</td>
<td>Procedure in place Implemented per USNCP Manual</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>26</strong></td>
<td>All outgoing plant material is inspected and inspection records are available, legible, and contain the date of inspection, person carrying out inspection, pests found, and any corrective actions taken.</td>
<td>Inspected Legible Records Complete Records</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>27</strong></td>
<td>Handling, storage, and delivery procedures are in place to ensure that product that has been examined and is verified free of pests is not contaminated by pests prior to its receipt by the consignee.</td>
<td>Handling Storage Delivery</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Item</td>
<td>Administration and Records</td>
<td>Yes</td>
<td>No</td>
<td>N/A</td>
<td></td>
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<tr>
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<tr>
<td>28</td>
<td>A current approved USNCP Manual is available to all staff members.</td>
<td></td>
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<tr>
<td></td>
<td><strong>Hard copy</strong></td>
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<tr>
<td></td>
<td><strong>Electronic copy</strong></td>
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<tr>
<td>29</td>
<td>Manual amendment records are current and complete including any additions, omissions, or changes to the document, the date they were made, and who authorized the change(s).</td>
<td></td>
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<td></td>
<td><strong>Current</strong></td>
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<tr>
<td></td>
<td><strong>Complete</strong></td>
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<tr>
<td>30</td>
<td>State and/or Country and APHIS have been notified of any changes to the USNCP Manual or facility prior to their implementation.</td>
<td></td>
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<tr>
<td>31</td>
<td>All reports or records are signed and dated.</td>
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<tr>
<td></td>
<td><strong>Signed</strong></td>
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</tr>
<tr>
<td></td>
<td><strong>Dated</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>32</td>
<td>All USNCP phytosanitary certificates can be accounted for using the system in place.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>33</td>
<td>The facility has a system in place to trace plant materials forward and backward from the facility.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>34</td>
<td>Plant source / supplier list is available and current.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Available</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Current</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>35</td>
<td>A procedure is in place to maintain all records and back-up all electronic records for 3 years and the procedures are implemented as described.</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td><strong>Procedure in place</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Implemented per USNCP Manual</strong></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>
36. USNCP records and back-up records are located in the facility as described in the approved USNCP Manual.

37. The staff working in administration and record keeping are aware and understand that USNCP records are required to be maintained and backed-up (electronic records) for three years regardless of the status of the nursery in USNCP.

38. Staff is aware of all forms used for the USNCP and makes them available to the entire nursery staff.

39. The facility has a suitable training system in place to ensure that each person involved in implementing USNCP is aware of the duties of their job under USNCP.

40. Training records for staff working in shipping, receiving, pest control, scouting, propagation, and production are available, current, and legible.

41. The staff is aware of the requirement for internal and external audits and understands the details of the procedure for completing audits as described in the USNCP Manual.

42. Procedures are in place and implemented to ensure that one internal systems audit and four internal surveillance audits are performed each year. At least one audit is done during the growing season and one during the shipping season.

43. Procedures are in place and implemented to ensure that auditors do not audit their own work during internal audits.

44. Internal audit records are available and include identified non-conformances and corrective actions taken.

45. Procedures are in place and implemented that ensure that corrective actions requests are generated for each non-conformance detected during an internal audit.
<table>
<thead>
<tr>
<th></th>
<th>Procedures are in place and implemented to ensure that internal audit non-conformances are classified as critical, major, or minor.</th>
</tr>
</thead>
<tbody>
<tr>
<td>47</td>
<td>Required corrective actions from a previous internal audit have been implemented within the time frame specified on the CAR.</td>
</tr>
<tr>
<td>48</td>
<td>Internal audit reports are prepared after each audit within the time period specified in the USNCP Manual of the facility.</td>
</tr>
<tr>
<td>49</td>
<td>Detailed records of external audits, including documentation of all non-conformances, corrective actions, audits, and follow-up examinations, are available and legible.</td>
</tr>
<tr>
<td>50</td>
<td>Procedures are in place and implemented to prevent recurrences of non-conformances found during external audits. For example, was the manual amended? Were employees retrained?</td>
</tr>
<tr>
<td>51</td>
<td>Corrective action requests from an external audit have been addressed in the time period specified on the CAR.</td>
</tr>
<tr>
<td>52</td>
<td>Name, title, qualifications, specific duties, responsibilities, and a qualified alternate for all staff involved in implementing the USNCP are stated for each for each position listed:</td>
</tr>
<tr>
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<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>53</td>
<td>Contact information for the Certification Manager and Pest Control Manager and their back-ups is current.</td>
</tr>
<tr>
<td>54</td>
<td>State/County and APHIS have been notified if the Certification Manager, Pest Control Manager, and/or their designated back-ups changed.</td>
</tr>
</tbody>
</table>
55 Up-to-date copies of the following reference documents are readily available to all staff involved in the USNCP:

- Plant Protection Act and Regulations
- USNCP Manual approved by APHIS
- List of quarantine pests of concern to Canada and the USA
- Pertinent federal regulations for certified facilities in areas with regulated pests

**Comments:**

<table>
<thead>
<tr>
<th>Item</th>
<th>Propagation / Production</th>
</tr>
</thead>
<tbody>
<tr>
<td>56</td>
<td>The map of the facility in the USNCP Manual accurately reflects the physical layout of the propagation and production areas and flow of plant material through them.</td>
</tr>
<tr>
<td>57</td>
<td>The propagative origins of all plants are identifiable and traceable through the propagation process.</td>
</tr>
<tr>
<td>58</td>
<td>The propagative origins of all plants are identifiable and traceable through the production process.</td>
</tr>
<tr>
<td>59</td>
<td>Staff is aware and trained in the use of all forms used for the USNCP relating to propagation.</td>
</tr>
<tr>
<td></td>
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</tr>
<tr>
<td>60</td>
<td>Staff is aware and trained in the use of all forms used for the USNCP relating to production.</td>
</tr>
<tr>
<td>61</td>
<td>A procedure is in place for ensuring that APHIS and the State/County are notified immediately of any pest finds of significance and the procedure is implement as described in the USNCP Manual.</td>
</tr>
<tr>
<td>62</td>
<td>Record keeping procedures being utilized in propagation and production are implemented as described in the USNCP Manual.</td>
</tr>
<tr>
<td>63</td>
<td>The staff working in propagation and production understands that all USNCP records are required to be maintained and backed-up (electronic records) for three years.</td>
</tr>
<tr>
<td>64</td>
<td>Treatments, cultural practices, or other measures in place to ensure that the product meets the phytosanitary requirements of the USNCP are implemented as described in the USNCP Manual.</td>
</tr>
<tr>
<td>65</td>
<td>Systems in place to trace a plant within the facility through the propagation and production cycles are demonstrated to be effective.</td>
</tr>
<tr>
<td>66</td>
<td>The Production Manager ensures, and can demonstrate, that all pest and commodity specific requirements are met prior to shipping.</td>
</tr>
</tbody>
</table>

**Comments:**
<table>
<thead>
<tr>
<th>Item</th>
<th>Scouting / Pest Control</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>67</td>
<td>The map of the facility in the USNCP Manual accurately reflects the actual physical layout of the scouting and pest control office and areas.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>68</td>
<td>The facility has implemented a Pest Management Plan as outlined in their USNCP Manual.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>69</td>
<td>Operational procedures and record keeping methods for scouting and pest control are accurately described are implemented as described in the USNCP Manual.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>70</td>
<td>Staff in scouting and pest control can describe their scouting and pest control duties in relation to the USNCP.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>71</td>
<td>Staff in scouting and pest control understand that USNCP records are required to be maintained and backed-up (electronic records) for three years.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>72</td>
<td>Staff is aware and trained in the use of all forms used for logging inspections; identifying, tracking and treating pests; and implementing corrective action.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>73</td>
<td>A procedure is in place for ensuring that APHIS and the State/County are notified immediately of any pest finds of significance and the procedure is implemented as described in the USNCP Manual.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>74</td>
<td>Scouting records are available, legible, and completely filled out showing the date of examination, the person carrying out the examination, any pests found, and any corrective actions taken.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>75</td>
<td>A description is available of the scouting methods used to examine all plant material in the nursery.</td>
<td></td>
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<tr>
<td>76</td>
<td>A list of quarantine pests of concern to CFIA and USDA is available.</td>
<td></td>
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<tr>
<td></td>
<td>Description</td>
<td>Status</td>
<td></td>
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<td>-----------------------------------------------------------------------------</td>
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<td></td>
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</tr>
<tr>
<td>77</td>
<td>Unknown pests or diseases are documented and submitted to an approved laboratory or agency for identification.</td>
<td>Documented</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Submitted</td>
<td></td>
<td></td>
</tr>
<tr>
<td>78</td>
<td>Pest control application records are available, legible, and completely filled out including a description of the treatment, date of application, name of applicator, location, reason for the treatment, and any follow up required.</td>
<td>Available</td>
<td></td>
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<td></td>
<td></td>
<td>Legible</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>Complete</td>
<td></td>
<td></td>
</tr>
<tr>
<td>79</td>
<td>Procedures are in place and implemented that ensure effective treatment or disposal of products that are contaminated by non-regulated plant pests.</td>
<td>Propagation</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Production</td>
<td></td>
<td></td>
</tr>
<tr>
<td>80</td>
<td>A list of regulated plant pests that have additional requirements that the facility must address is available.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>81</td>
<td>Procedures to address specific regulated pests are implemented as described in applicable pest control modules of the USNCP Manual.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>82</td>
<td>Procedures are in place and implemented to ensure expedient control or eradication of non-regulated pests discovered during examinations or audits.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>83</td>
<td>Facility maintains a description and documentation of pest control strategies used to maintain freedom from quarantine pests and practical freedom from other injurious pests.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>83</td>
<td>Staff can provide a description of pest control strategies used to maintain freedom from quarantine pests and practical freedom from other injurious pests.</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

**Comments:**
ADDENDUM 4: USNCP AUDIT PLANNING CHECKLIST

This checklist is designed to help auditors prepare for the audit of Certified Facilities participating in the USNCP.

The following issues have been considered:

___ Meeting rooms, work space, phone, fax
___ Shift start and end times
___ Sanitation issues (e.g. disinfect shoes, first facility of the day)
___ Dress code and safety requirements
___ Special events (e.g. company events, etc.)
___ Photocopier/computer
___ Travel to and between sites
___ Special access requirements (e.g. phytosanitary issues)
___ Weather conditions
___ Audit scope and objectives:
   • Systems or Surveillance Audit?
   • What area or department is to be audited?
   • What is audit expected to verify or discover?
   • What information will be required?
   • What will not be included in the audit?
___ The depth of the audit: Will audit include a detailed review of every element or specific processes?
___ Employees:
   • Develop an interview list by identifying individuals that have significant direct responsibilities in the implementation of the USNCP.
   • Develop a list of backups to interview, in case the first choices are not available.
   • How long will these interviews take?
   • Where will these interviews occur?
___ Obtain a copy of the Certified Facility’s current USNCP Manual.
Identify members of the Audit Team.

- How many people are needed to conduct the audit?
- What special skills or experience is required?
- How many people will you need based on:
  - Scope of Audit
  - Size of Certified Production Facility
  - Location of Certified Production Facility
  - Results of previous audits
  - Effectiveness of previous corrective actions
  - Effectiveness of internal audits

Date(s) for the audit.

- How many days are needed based on the scope and the objective of the audit?

Schedule of meetings with management, including the Certification Manager and the Pest Control Manager.

Confidentiality requirements.

- Who will have access to the audit results?
- Considerations for “confidentiality” for employees of the Certified Facility.

Audit report and distribution and expected date of issue.

- Who will receive copies of the final audit report?
- When will the audit report be issued?

Send a letter (or email) to confirm the audit date and time.
ADDENDUM 5: USNCP AUDIT OPENING MEETING CHECKLIST

Date: __________________________
Facility Name: _____________________________________________________________
Facility Address:____________________________________________________________
Type of Audit: _____________________________________________________________
Scope of Audit: _____________________________________________________________

<table>
<thead>
<tr>
<th>Item</th>
<th>Activity</th>
<th>Complete</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Introduction of audit team and facility staff.</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Completion of attendance list, confirm taking of minutes.</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Confirm purpose and scope of audit.</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Explain audit process.</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Explain non-conformances and CARs.</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Explain how results will be documented.</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Explain reporting process and follow up process.</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Confirm any confidentiality requirements.</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Discuss any special safety requirements.</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Confirm audit program/plan.</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Confirm office facilities, lunch arrangements, etc.</td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Confirm availability of guides and interviewees.</td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>Confirm arrangements for a facility tour.</td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>Agree on a tentative time for the closing meeting.</td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>Invite Certification Manager and senior management to attend closing meeting.</td>
<td></td>
</tr>
</tbody>
</table>
ADDENDUM 6: USNCP AUDIT CLOSING MEETING CHECKLIST

Date: __________________________
Facility Name: ______________________________________________________________
Facility Address:_____________________________________________________________
Type of Audit: _______________________________________________________________
Scope of Audit: _______________________________________________________________

<table>
<thead>
<tr>
<th>Item</th>
<th>Activity</th>
<th>Complete</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Re-confirm purpose and scope of audit.</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Confirm someone is taking minutes.</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Announce results.</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Explain non-conformances and CARs.</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Give summary of audit, include positive aspects.</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Announce intended issue date for the Audit Report.</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Request response date for CARs.</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>State the facility status that will be recommended to APHIS Headquarters.</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Discuss any observations/concerns.</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Discuss date for next audit.</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Thank facility staff for assistance and cooperation.</td>
<td></td>
</tr>
</tbody>
</table>
ADDENDUM 7: USNCP AUDIT REPORT PREPARATION CHECKLIST

This list is designed to facilitate the creation of an Audit Report following an audit of a USNCP facility.

___ Describe the scope of the audit.

___ State of objectives of the audit.

___ Include a distribution list for the Audit Report (see Appendix 6, Section H “Audit Report”).

___ Provide specific details, such as:

- Dates and location of the audit,
- Names of the audit team members,
- Language of the audit,
- Names of personnel at the Certified Facility responsible for USNCP,
- Areas of the Certified Production Facility audited.

___ List all reference documents used for the audit.

___ Describe the audit findings and reference any CARs (Appendix 8);

___ Evaluate the audited facility’s compliance with the documentation requirements.

___ Evaluate the efficacy of the Phytosanitary Management System in meeting the requirements of the Standards for Phytosanitary Measures Requirements for the Certification of Nurseries under the United States Nursery Certification Program.

- Is there evidence that management supports the implementation and maintenance of the USNCP at the facility?
- Are resources allocated and are staff supported when they work towards implementing and improving the Phytosanitary Management System?
- Is an infrastructure in place to support the USNCP (documents, written procedures, reference materials, clear lines for decision making)?
- Is the Phytosanitary Management System effective?
- Is there an effective process for incorporating improvements into the Phytosanitary Management System?

___ Comments, observations (Appendix 9), and/or recommendations for improvement.

___ Propose a date for the next audit and any other follow-up activities.