

Technical Requirements

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

June, 2016

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Endorsement

Initial Endorsement

The Technical Requirements, United States-Canada Greenhouse-Grown Plant Certification Program (GCP), Version 1.0 dated May 27, 2016 and including any future endorsed amendments, is the Program established by the *Memorandum of Understanding between the Canadian Food Inspection Agency, Plant Health and Biosecurity Directorate and the United States Department of Agriculture, Animal and Plant Health Inspection Service regarding the United States-Canada Greenhouse-Grown Plant Certification Program.*

Dated August 18, 2016

Dated August 26, 2016

Darlene Blair

For the Canadian Food Inspection Agency

Osama El-Lissy

For the United States Department of
 Agriculture, Animal and Plant Health
 Inspection Service

Amendment and Endorsement

Amendments will be identified by the updated GCP version number and will include a summary of any changes, including the Part and Section number(s). The primary digit in the version number will be advanced when there are significant changes to the body of the GCP Technical Requirements. The secondary digit in the version number will be advanced when there are minor changes to the body of the GCP Technical Requirements or changes to the Appendices.

Illustration

Version number	Summary of changes
Date	
For the Canadian Food Inspection Agency	For the United States Department of Agriculture, Animal and Plant Health Inspection Service

PART I - Introduction

The United States - Canada Greenhouse-Grown Plant Certification Program (GCP) is a bilateral export certification program for greenhouse-grown plants shipped between Canada and the continental United States. The GCP is the successor to the greenhouse certification program that was established via a Memorandum of Understanding (MOU) between APHIS and CFIA in 1996. The GCP is established through the *Memorandum of Understanding between the Canadian Food Inspection Agency, Plant Health and Biosecurity Directorate and the United States Department of Agriculture, Animal and Plant Health Inspection Service regarding the United States-Canada Greenhouse-Grown Plant Certification Program* which replaces the original MOU.

The GCP is based on a systems approach that integrates different pest risk management measures to achieve the appropriate level of protection against regulated pests.

Facilities that enter into a Compliance Agreement with either the United States Department of Agriculture, Animal and Plant Health Inspection Service (APHIS) or the Canadian Food Inspection Agency (CFIA) are authorized to export Certified Plants to the United States or Canada with an Export Certification Label in lieu of a phytosanitary certificate. Certified Plants are greenhouse-grown plants that meet all of the phytosanitary import requirements of both Canada and the United States and have completed all the requirements of the GCP. The national plant protection organizations (NPPOs) conduct audits at the facilities in their country to authorize facilities and verify compliance with the GCP.

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

Phase 1 – Determining Eligibility of Plants: Greenhouse-Grown plants must originate in either Canada or the United States, or if imported from a third country, they must be enterable into the United States and Canada as per both countries' phytosanitary regulations. Plants that meet these requirements are Eligible Plants and may enter into the GCP.

Phase 2 – Activities at an Authorized Facility: Eligible Plants that are produced at an authorized production facility in accordance with the procedures described in their written Pest Management Plan become Certified Plants. Modules that describe specific pest mitigation or production measures may be required to be included in the Pest Management Plan.

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

1.0 Purpose

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

2.0 Authority

Regulatory authority is provided by:

a. CFIA:

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

Plant Protection Regulations, SOR/95-21 2

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

b. APHIS:

United States Plant Protection Act, June 20, 2000

United States Code of Federal Regulations 7 CFR 319

United States Code of Federal Regulations 7 CFR 360

3.0 References

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

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

CFIA Automated Import Reference System (AIRS).

USDA Plants for Planting Manual.

USDA Canadian Border Agricultural Clearance Manual.

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

ISPM 5. International Standards for Phytosanitary Measures. Glossary of Phytosanitary Terms (as amended by CPM-10). 2015, FAO.

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

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

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

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

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

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

4.0 Glossary

Definitions for phytosanitary terms used may be found in ISPM 5, Glossary of Phytosanitary Terms (IPPC, 2015), in RSPM 5, NAPPO Glossary of Phytosanitary Terms (Revised) (NAPPO, 2012) and in RSPM 24, Integrated Pest Risk Management Measures for the Importation of Plants for Planting into NAPPO Member Countries (NAPPO, 2005).

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

Associated Article: a thing accompanying a GCP Certified Plant that normally requires a phytosanitary certificate for shipment between the United States and Canada (e.g., a bamboo stake included with a potted plant).

Authorized Facility (General): A facility that is under Compliance Agreement with the NPPO of the exporting country to participate in the GCP.

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

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

CFIA: Canadian Food Inspection Agency.

Certified Plant: An Eligible Plant that meets the requirements of the GCP and is ready for export.

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

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

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

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

Greenhouse: For the purpose of the GCP, a greenhouse is the physical location where plants are grown within, under, or sheltered by structures to provide a modified growing condition and/or protection from pests and the outdoor environment. These structures may include greenhouses, hoop houses, screen

houses, shade houses, or other structures that are determined by the NPPO of the exporting country to meet the minimum operating requirements of GCP.

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

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

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

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

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

Pest Module: Specific pest risk management measures for regulated pests included in the Pest Management Plan.

Production Module: Additional pest risk management measures employed to permit an exemption from a requirement of the GCP and/or to address concerns regarding specific production conditions included in the Pest Management Plan.

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

Scouting: Intentional and ongoing monitoring by the Authorized Facility to detect regulated pests, unusual damage or symptoms that may indicate the presence of a pest of concern, or any pest that may be new or previously unreported.

Surveillance Audit: Verification of the ongoing compliance of the Authorized Facility with the requirements of the GCP by conducting audits on specific portions of the operation.

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

PART II – General Program Requirements

1.0 GCP Requirements

Plants produced under the United States – Canada Greenhouse-Grown Plant Certification Program, must be free from regulated pests of concern to both Canada and the United States and must meet the phytosanitary import requirements of both Canada and the United States.

To verify freedom from regulated pests, Authorized facilities will:

- inspect plants entering the facility;
- implement a crop scouting program for plants in production;
- inspect Certified Plants when they are shipped;
- identify unknown pests; and
- report new pests and regulated pests found in an area where they have not previously been known to exist to the NPPO.

Authorized Facilities must be maintained practically free from injurious pests.

2.0 Phytosanitary Import Requirements and Regulatory Guidance

The following are the phytosanitary import requirements and regulatory guidance for plants for planting for Canada and the United States.

These references may not be all inclusive. Please contact a regulatory official for confirmation of the requirements.

2.1 Canada

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

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

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

2.2 United States

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

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

Electronic Code of Federal Regulations, TITLE 7—Agriculture, Subtitle B—Regulations of the Department of Agriculture, Chapter III—Animal and Plant Health Inspection Service, Department of Agriculture, Part 319, Foreign Quarantine Notices, Subpart 319.37 Plants for Planting (<http://www.ecfr.gov/cgi-bin/text-idx?SID=b9b69b54437504a224aedf8b999c5781&mc=true&node=sp7.5.319.xx9&rgn=div6>) and, Part 360 Noxious Weed Regulations (<http://www.ecfr.gov/cgi-bin/text-idx?SID=d1819631de05c1e903126a01ae98be28&node=7:5.1.1.1.18&rgn=div5>).

3.0 Eligible Plants

Plants must originate in either Canada or the United States, or if imported from a third country, they must be enterable into both the United States and Canada as per each country’s phytosanitary regulations as specified in this Part, Sections 2.1 and 2.2. Plants that meet these requirements are Eligible Plants and may enter into the GCP.

For example, plants must:

- not be prohibited;
- not be listed as Not Authorized Pending Pest Risk Analysis (NAPPRA) into either the United States or Canada directly from the country of origin;
- meet size/age requirements (7 CFR 319.37-2(b)), if entering from a third country; and
- meet any other regulatory requirements that may be applicable.

Authorized Facilities are required to maintain a current list of plants in production at their facility indicating which plants are eligible and ineligible for the GCP. The description of plants should include the growth stage and form of incoming plants, e.g. seed, in-vitro/tissue culture plantlets, cuttings, plugs, bare-root plants, or pre-finished plants. The list must be accepted by the exporting country’s NPPO. The NPPO verifies which plants are eligible for inclusion in the GCP, based on taxa and source. The NPPO may be consulted for guidance on how to assess which plants are eligible or ineligible.

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

- Seeds;
- Grain;
- Seed potatoes (*Solanum tuberosum*);
- Regulated invasive plants;
- Regulated noxious weeds; or
- Fresh fruits or vegetables.

Plants may be grown and shipped in any growing media that is acceptable for trade in plants between the United States and Canada.

Plants entering into Canada or the continental United States in growing media from a third country must meet the requirements of both 7CFR 319.37-8 AND the Canadian Growing Media Program at the time of entry to be eligible for inclusion in the GCP.

Plants entering Canada or the continental United States from the state of Hawaii or a U.S. territory must meet the requirements of the Canadian Growing Media Program and 7CFR 318.13 at the time of entry to be eligible for inclusion in the GCP.

Specific plant taxa and production practices may be eligible for the GCP or may be excluded from the program based on agreement between APHIS and CFIA.

3.1 Associated Articles

Certified Plants that include Associated Articles that normally require a phytosanitary certificate for shipment between the United States and Canada (e.g., bamboo stakes), may be certified using an Export Certification Label or Interfacility Stamp without requiring a separate phytosanitary certificate when:

- the Pest Management Plan includes a Production Module that details the process for ensuring that the Associated Articles are enterable into both the United States and Canada; and
- the Authorized Facility's procedures for Associated Articles include the same safeguarding, inventory control and record keeping requirements as for Eligible Plants.

4.0 Plant Growth and Monitoring

Greenhouse-grown plants are intended to be propagated and grown in a greenhouse from seed, in-vitro/tissue culture plantlets, cuttings, plugs, bare-root plants, or pre-finished plants, until the plants leave the greenhouse production system.

To be authorized for shipment under the GCP, plants must be grown at an Authorized Facility for a minimum growth and monitoring period in order to provide an opportunity to detect and control pests.

Authorized Facilities must implement a crop scouting program with the purpose of detecting regulated pests, unusual damage or symptoms that may indicate the presence of a pest of concern, or any pest that may be new or previously unreported.

4.1 Growth and Monitoring Period

Eligible Plants will be considered Certified Plants when they have completed the growth and monitoring period at the Authorized Facility and provided they meet the phytosanitary import requirements of both Canada and the United States.

The growth and monitoring period is 28 days and is intended to ensure that any regulated pests that may be present are detected at the Authorized Facility prior to shipment. The NPPO may require a longer period depending on the risk associated with the plants.

4.1.1 Exceptions to the Growth and Monitoring Period

The 28 day growth and monitoring period is not required for:

- plants grown at the Authorized Facility from seed;
- plants grown at the Authorized Facility from tissue culture, or cuttings with a country of origin of the continental United States or Canada;
- plants that arrive at the Authorized Facility with an Export Certification Label or Interfacility Stamp;
- non-GCP greenhouse-grown plants that arrive at the Authorized Facility with a country of origin of the continental United States or Canada declared on a phytosanitary certificate issued by Canada or the United States; or
- non-GCP greenhouse-grown plants that arrive at the Authorized Facility from a non-GCP facility in the same country¹ provided that:
 - The country of origin of the plants is Canada or the continental United States; and
 - The plants receive an official phytosanitary inspection verifying that the phytosanitary requirements of both Canada and the United States are met.

¹ *This exception is not intended as an alternative to the issuance of a phytosanitary certificate for consignments of plants which are not produced under the GCP. If an entire shipment consists of plants obtained from a non-GCP facility and that have not completed the requirements of the GCP at the Authorized Facility, an export certification label may not be used, although a phytosanitary certificate may be issued.*

4.2 Exemptions

The NPPOs will jointly consider written proposals for exemption from certain provisions of the GCP. Proposals should be directed to the NPPO where the facility is located.

The conditions recognized by the NPPO must be described in a Production Module included in the Pest Management Plan. A recognized exemption proposal will include requirements for the Production Module which may include the risk mitigation measures proposed by the Authorized Facility and/or risk mitigation measures specified by the NPPO.

4.2.1 Requesting Exemption from the Growth and Monitoring Period

Authorized facilities may request exemption from the 28 day growth and monitoring period for specific taxa.

The Authorized Facility is responsible for providing the information and justification necessary to assess the proposal. Proposals must include:

- proposed production information, including plant taxa, origin, a description of the plant growth stage and production cycle;
- the desired growth and monitoring period;
- an explanation of why the shorter growth and monitoring period is desirable; and
- a description of any additional risk mitigation measures that will be put in place.

4.2.2 Requesting Exemption for Outdoor Production

Some taxa of greenhouse-grown plants benefit from a period of outdoor growth including hardening off or specific production requirements. Authorized facilities may request an exemption from the requirement for plants to be exclusively greenhouse-grown.

The Authorized Facility is responsible for providing the information and justification necessary to assess the proposal. Proposals must include:

- Proposed production information, including plant taxa, origin, a description of the plant (e.g., size, age, pot size) at the start and end of outdoor growth and the production cycle of the plant from the time the plant is received or propagated by the authorized facility until the plant leaves the authorized facility;
- The desired growing conditions, including a description of the location, the anticipated start and end dates for outdoor growth, etc.;
- An explanation of why outdoor growth is desirable; and
- A description of additional risk mitigation measures that will be put in place.

5.0 Regulated Pests

While APHIS and CFIA each publish lists of regulated pests, these references are not all inclusive.

Please contact a regulatory official for confirmation of the requirements.

A list of some U.S. regulated pests may be found at:

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

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

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

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

6.0 Pest Management Plan

Authorized Facilities are required to have a written Pest Management Plan that follows the template in Appendix I (see also Part IV, Section 2.2.6). The Pest Management Plan must be implemented throughout the entire Authorized Facility in a manner that will ensure consistent compliance with the requirements of the GCP.

7.0 Modules

The NPPO may require Modules for plants from specific origins, certain plant taxa and/or particular production practices. Modules describe the specific measures that have been implemented at the Authorized Facility to meet particular pest risk management objectives.

Modules must be described in the facility's Pest Management Plan and must be reviewed and accepted by the NPPO responsible for authorizing the facility.

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

7.1 Pest Modules

Pest Modules describe the specific measures used by the facility to prevent the spread of regulated pests.

Pest Modules are required when there is a regulated pest present in the area where the authorized facility is located AND there are plants in production that could be a pathway for the regulated pests. Pest Modules are always required when a phytosanitary certificate would require an additional declaration for export of the same plants. The NPPO will inform the Authorized Facility when a Pest Module is required, based on the presence of pests in the area where the Authorized Facility is located and the list of plants grown at the facility.

Authorized facilities must work with their respective NPPO to determine any pest mitigation measure that may be required.

Appendix II includes a list of pests regulated by APHIS and/or CFIA that may require a Pest Module under the Pest Management Plan. Pests of regulatory significance that do not appear on this list may also require a Pest Module. The decision to require a Pest Module is at the discretion of the NPPO.

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

7.2 Production Modules

Production Modules are required when the Authorized Facility has been granted an exemption from a provision of the GCP (Part II, Section 4.2), when the facility incorporates Associated Articles in the GCP (Part II, Section 3.1) or when the NPPO determines that specific measures are required for a specific origin and/or plant taxa.

The measures described in the module may be proposed by the Authorized Facility and accepted by the NPPO or may be determined by the NPPO.

PART III – NPPO Responsibilities

1.0 General Information

APHIS and CFIA have jointly established these GCP technical requirements. The same criteria will be applied in both countries for administration and implementation of the GCP. The NPPOs are responsible for working together to review and update the GCP.

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

Both NPPOs will use the same elements in their Compliance Agreements (Part IV, Section 2) so that Compliance Agreements between APHIS and authorized facilities in the United States and Compliance Agreements between CFIA and authorized facilities in Canada are equivalent.

The NPPOs will provide guidance on how to assess which plants are eligible or ineligible for inclusion in the GCP and on meeting importing country requirements. The NPPOs will verify that Certified Plants are produced from Eligible Plants, are greenhouse-grown and monitored for pests for the prescribed period, and that only Certified Plants are shipped using an Export Certification Label.

2.0 Responsibility for Oversight

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

3.0 GCP Review and Maintenance

The NPPOs will hold an annual review to evaluate the performance of the GCP, identify individual program issues and recommend changes to improve the GCP. The annual review will include an exchange of non-compliance information, including suspension, cancellation and notices of non-compliance, evaluation of the program components and any new information since the last annual review. The GCP will undergo a full program review by APHIS and CFIA every five (5) years.

The CFIA and APHIS will work together to update the GCP Technical Requirements and supporting documents as required.

APHIS and CFIA will work together to facilitate consistent application and delivery of the GCP to meet phytosanitary objectives, including but not limited to:

- sharing and collaboration in the development of training material and job aids;
- assessing exemption requests;
- review of Modules; and
- response to non-compliant activities.

4.0 GCP Site Visits

The CFIA and APHIS may conduct an on-site review of any participant of the GCP in the other NPPO's territory in order to evaluate the administration and compliance with the requirements of the GCP. The scope of the review may include any element of the GCP and any other document incorporated into the GCP by reference.

The requesting party will provide at least thirty (30) days written notice to the other NPPO of their intention to conduct an on-site review.

5.0 Communication between APHIS and CFIA

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

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

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

5.1 Communications with Border Services

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

5.2 Communications with Stakeholders

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

6.0 Records Maintained by the NPPO

6.1 Lists of Authorized Facilities

The NPPOs will maintain lists of Authorized Facilities in their respective countries and supply that list to their counterpart as needed or upon request. To facilitate participation in the GCP and compliance with the GCP Technical Requirements, the NPPOs will make Authorized Facility information publicly available, including facility name, authorization number, city/town and province/state. When a Compliance Agreement is cancelled the facility will be removed from the list.

The Authorized Facility list will include:

- facility name;
- contact information;
- address;
- physical address/location of Authorized Facility; and
- authorization number.

6.2 Authorized Facilities Records

The NPPO will maintain the following information for each Authorized Facility under their administration (electronic versions are acceptable):

- the original application package that was submitted to the NPPO to support entry into the GCP;
- copies of all signed Compliance Agreements;
- copy of the Pest Management Plan and any amendments that have been reviewed and accepted by the NPPO, including any required Modules;
- serial numbers of all Export Certification Labels and number of Interfacility Stamps issued to the facility;
- copies of all Audit Reports;
- copies of all Corrective Action Requests (CARs);
- any written statements of corrective actions taken by the Authorized Facility;
- copies of any notifications of suspension and/or reinstatement; and
- copies of any correspondence between the Authorized Facility and the NPPO.

7.0 Export Certification Labels and Interfacility Stamp

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

A unique authorization number assigned to the Authorized Facility will appear on the Interfacility Stamp and on each Export Certification Label. Each Export Certification Label will also have a printed serial number, making each label unique.

NPPOs will collect Export Certification Labels and Interfacility Stamps from a facility in the event that it is suspended or has its authorization cancelled.

NPPOs will provide each other with examples of their Export Certification Labels and Interfacility Stamps and will formally notify each other if there are any changes made to their format and/or design.

7.1 Export Certification Label

Export Certification Labels will bear the following:

- “United States – Canada Greenhouse-Grown Plant Certification Program”;
- Identification of the authorizing NPPO;

- Authorized Facility authorization number;
- Unique serial number; and
- Certification statement.

The following certification statement will appear on Export Certification Label issued by CFIA:
“This shipment of greenhouse-grown plants meets the import requirements of the United States, and is believed to be free from injurious plant pests. Issued by Plant Health and Production Division, Canadian Food Inspection Agency.”

The following certification statement will appear on Export Certification Labels issued by APHIS:
“This shipment of greenhouse-grown plants meets the import requirements of Canada and is believed to be free from injurious plant pests”.

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

7.2 Interfacility Stamp

The NPPO is responsible for monitoring the use of the Interfacility Stamps. The Interfacility Stamps may only be used to communicate to Authorized Facilities within the same country that plants are Certified Plants that have completed all requirements of the GCP and may be exported using an Export Certification Label.

Interfacility Stamps will bear the following:

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

8.0 Authorization of Facilities

8.1 Application for Facility Authorization

The NPPO is responsible for reviewing and evaluating the GCP application forms and associated documentation submitted by facilities in their respective countries (Part IV, Section 1). The template for the application form and a list of all the required documents and information that must be included with the application is in Appendix III. When the documentation presented indicates that the facility has the capability to meet the requirements of the GCP then an authorization audit will be conducted.

8.2 Evaluating the Pest Management Plan

The Pest Management Plan is completed by the Authorized Facility using the template in Appendix 1 and is used to record details about the facility, key personnel and specific activities included in the Compliance Agreement.

The Pest Management Plan will be specific to the unique characteristics of the individual facility, considering the plants being produced, the physical characteristics of the facility, including its location relative to established regulated pests, and will include any Pest and Production Modules and any special requirements determined by the NPPO.

The Authorized Facility is required to notify the NPPO of any changes to GCP procedures, facility ownership or the GCP Manager at their facility. The Pest Management Plan should be amended to reflect these changes. This may trigger an evaluation of the amended document by the NPPO. The NPPO should review the Pest Management Plan as part of each audit.

8.3 Review of List of Plants in Production

The NPPO will verify the eligibility and ineligibility of plants grown at the Authorized Facility per Part II, Section 3.0, Eligible Plants.

A complete review of the list of plants will take place prior to the Authorization Audit.

A review of updates to the list of plants will take place at each Systems and Surveillance Audit or more frequently if required by the NPPO.

8.4 Authorization Audit

The Authorization Audit is a specific type of Systems Audit (see Section 9.1.2) that is conducted after a facility's GCP application package has been reviewed and accepted by the NPPO and prior to entering into a Compliance Agreement. The purpose of the Authorization Audit is to demonstrate that all components of the Compliance Agreement have been implemented at the facility. Any non-compliance identified during the Authorization Audit must be resolved before the NPPO signs the Compliance Agreement with the Authorized Facility.

8.5 Compliance Agreement and Authorization

If the documentation and audit are satisfactory then the facility and the NPPO may enter into a Compliance Agreement (Part IV) and the facility may be considered an Authorized Facility, with respect to the GCP. When a facility authorization number has been assigned to the Authorized Facility, they may obtain Export Certification Labels and/or Interfacility Stamps.

9.0 Audit

NPPOs will conduct regular audits of Authorized Facilities to:

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

9.1 Systems and Surveillance Audits

A combination of Systems and Surveillance Audits are used to verify that the Authorized Facility meets the requirements established by the Compliance Agreement between the Authorized Facility and the NPPO. The auditors gather and/or record objective evidence to demonstrate that the integrated pest risk management measures in place at the Authorized Facility are sufficient to achieve the appropriate level of protection against regulated pests and that Certified Plants consistently meet the requirements of the GCP. When non-compliances are identified during an audit, corrective measures are taken to prevent reoccurrence.

The audit focus includes, but is not limited to;

- how the Authorized Facility carries out the activities of the GCP;
- how key processes are performed and measured; and
- review of previous areas of weakness or non-compliance.

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

9.1.1 Systems Audit

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

9.1.2 Surveillance Audit

Surveillance audits verify the ongoing compliance of the Authorized Facility with the requirements of the GCP by conducting audits on specific portions of the operation. The audits should encompass the complete organizational structure over time.

Surveillance audits will always include an examination of plants in production at the facility to verify the presence or absence of regulated pests and the overall pest status of the facility.

9.2 Facility Status and Audit Frequency

Audit frequency is determined by the facility status. The NPPO is responsible for assigning a facility status to each of the Authorized Facilities in their jurisdiction. Facilities will be returned to Conditional Status, moved to Standard Status or suspended at the discretion of the NPPO.

9.2.1 Conditional Status

All newly Authorized Facilities are initially placed at Conditional Status and remain at Conditional Status for a minimum of one year. Facilities in Conditional Status will be audited at least once per quarter and there must be a minimum of one systems audit per year. At least one surveillance audit must take place during the production period of the plants intended for export.

9.2.2 Standard Status

Authorized Facilities that have successfully completed their first year at Conditional Status with a good compliance record (including no critical or major non-compliance), may be moved to Standard Status. The audit frequency associated with Standard Status is one systems audit and one Surveillance Audit annually. These audits must be conducted on separate occasions and must be carried out when the Authorized Facility is producing plants for export.

9.2.3 Status Following Suspension

Facilities that are re-Authorized following a suspension will be returned to Conditional Status and will continue to operate in Conditional Status until the Authorized Facility demonstrates consistent compliance with GCP.

9.2.4 Seasonal Authorized Facilities

A seasonal facility is one that does not grow plants 12 months of the year. Seasonal Authorized Facilities will have at least one Systems Audit and one Surveillance Audit per year, carried out at three (3) month intervals during the Authorized Facility's operating season.

9.3 Audit Report

After the conclusion of an audit, the auditor will prepare an audit report and provide it to the GCP Manager. In addition to standard audit reporting elements, the following GCP specific details will be included:

- Audit objective (Systems/ Surveillance);
- Audit scope:
 - content of Compliance Agreement audited;
 - content of Pest Management Plan reviewed; and
 - areas of Authorized Facility inspected;
- Audit findings, including non-compliance:
 - pests detected; and
 - objective evidence specific to recorded non-compliance;
- Corrective Action Requests;
- Minor Non-compliance;
- GCP status (Standard/ Conditional/ Suspended);
- Comments;
- Audit report distribution; and
- Proposed date for the next audit and any other follow-up activities.

10.0 Non-compliance and Corrective Action

Activities or products found to be in violation of the GCP are considered to be non-compliant.

Non-compliance may become apparent as a result of regulatory audits or may be detected through other activities (e.g. import monitoring, self-reporting, audit activities at other Authorized Facilities, etc.). The Authorized Facility is responsible for proposing corrective actions to prevent the non-compliance from recurring. This may require amendments to the Pest Management Plan or stricter adherence to the procedures described in it. If an Authorized Facility is unable or refuses to make the required correction(s) the Compliance Agreement will be cancelled. This means that the facility will be removed from the Authorized Facility list, the Export Certification Labels and Interfacility Stamps will be collected and the other NPPO will be notified.

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

10.1 Corrective Action Request

Corrective Action Requests (CAR) are used by the NPPO to formally communicate and record critical and major non-compliances and their resolution. A CAR must be issued by the NPPO for each Critical and each Major non-compliance detected.

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

A sample CAR form is in Appendix VII.

10.2 Classification of Non-compliance

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

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

10.3 Critical Non-compliance

A Critical non-compliance is any non-compliance that jeopardizes the integrity of the GCP due to a phytosanitary risk. The Authorized Facility is immediately suspended from the GCP until the corrective action is completed to the satisfaction of the NPPO. (Section 11.0, Suspension of Authorization)

10.4 Major Non-compliance

A Major non-compliance is a single incident of non-compliance that on its own has no direct impact on the integrity of the GCP, provided that remedial actions are completed within a period of time defined by the NPPO. Corrective actions must be carried out within the time frame specified by the auditor and should not exceed a maximum of two (2) weeks.

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

10.5 Minor Non-compliance

A Minor non-compliance is a non-compliance that does not immediately and/or significantly affect the integrity of the phytosanitary status of Certified Plants.

Although Minor non-compliances are recorded in the audit report, they do not result in a CAR. If the Minor non-compliance has not been corrected by the next scheduled audit, the auditor may use their discretion to re-classify that particular non-compliance as a Major non-compliance and then initiate a CAR.

11.0 Suspension of Authorization

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

The NPPO will notify the Authorized Facility in writing when their authorization to move plants with an Export Certification Label or Interfacility Stamp has been suspended. Upon suspension, all unused Export Certification Labels and the Interfacility Stamps must be surrendered to the NPPO.

The authorizing NPPO will determine when and how a suspension may be removed. At minimum, a suspension will remain in effect until the corrective actions described in the CAR(s) that triggered the suspension are addressed and verified complete by the NPPO.

11.1 Partial Suspension

When a Critical non-compliance is triggered by the presence of a regulated pest, the entire Authorized Facility is placed on suspension, pending further investigation by the NPPO.

Based on the biology of the regulated pest, the plants in production, the Authorized Facility response to the CAR and existing facility controls, the NPPO may choose to offer a partial suspension. A partial suspension permits the shipment of plants that meet the requirements of the GCP while ensuring that

plants exposed to or infested with regulated pests are not certified. The conditions of a partial suspension and its subsequent removal must be in writing.

Partial suspension may be used for specific taxa or for a specific location within the Authorized Facility, depending on the characteristics of the pest and the level of inventory control and safeguarding that is in place to prevent the regulated pest from spreading within the facility and being exported. Remaining plants that are not impacted by the Critical non-compliance may remain eligible for GCP certification.

12.0 Cancellation of Compliance Agreement

A facility's Compliance Agreement will be cancelled by the NPPO when:

- The facility is unable to maintain consistent compliance or achieve compliance within a reasonable period of time; or,
- The facility voluntarily withdraws from their Compliance Agreement.

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

Facilities whose Compliance Agreement has been cancelled may reapply for designation as an Authorized Facility in the GCP. If so, the entire application and approval process must be reinitiated, including submitting an application form and a revised Pest Management Plan. The NPPO may refuse to reauthorize facilities at their discretion.

PART IV – Facility Authorization and Compliance Agreement

1.0 Facility Authorization

A facility must apply to APHIS or CFIA for designation as an Authorized Facility in the GCP. When the authorization process is completed, the facility may ship Certified Plants under the GCP.

Businesses that are made up of multiple distinct, separate facilities will be required to submit a separate application package for each facility. A separate facility is one that is under different management and/or is under an autonomous management structure. The NPPO will make the final determination as to whether a business will be considered a single facility or multiple facilities, with respect to GCP authorization.

Any facility that grows plants is considered to be a Place of Production, even if they have a broker function as part of their business. Plant Brokers do not grow plants and are not considered a Place of Production.

1.1 Prerequisites for Authorization – all facilities:

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

- own, operate or manage a production facility or brokerage located in the United States or Canada;
- review and understand the requirements of the GCP and the elements of the applicable Compliance Agreement;
- designate a qualified individual to be the GCP Manager;
- complete and submit the appropriate signed “Application to Participate in the United States-Canada Greenhouse-Grown Plant Certification Program” (Appendix III);
- participate in the Authorization Audit and demonstrate that all the components of the GCP Compliance Agreement have been implemented at the facility; and
- complete any corrective action requests identified during the Authorization Audit.

1.2 Additional Prerequisites for Places of Production

- submit a current list of plants in production at the facility including the information specified in Part IV, Section 2.2.2; and
- submit a written Pest Management Plan (Appendix I).

2.0 Compliance Agreement for Authorized Facilities

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

The Compliance Agreement between the Authorized Facility and the NPPO will include:

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

“This facility is authorized to ship Certified Plants in accordance with the United States – Canada Greenhouse-Grown Plant Certification Program. Certified Plants moving between the United States and Canada may be shipped under an Export Certification Label in lieu of a phytosanitary certificate. Certified Plants moving domestically between Authorized Facilities may be shipped under an Interfacility Stamp.”

“The NPPO may make changes to the Compliance Agreement to reflect updates to the United States – Canada Greenhouse-Grown Plant Certification Program.”

2.1 Compliance Agreement Elements for All Authorized Facilities

2.1.1 GCP Manager and Designated Staff

Management of the Authorized Facility must appoint a GCP Manager and an alternate who are responsible for ensuring the facility meets all requirements of the GCP. The GCP Manager must have the authority and responsibility to develop and implement procedures to meet the requirements of the GCP. The GCP Manager may designate qualified personnel or contractors to assist with specific components, for example pest management, tracking product identity, administration and record keeping, etc.

The individuals designated to carry out tasks related to the GCP must have adequate knowledge, skills and training, and must be vested with the authority to ensure the requirements of the GCP are met.

The GCP Manager is responsible for:

- Administration, including sourcing eligible plants, maintaining product identity, shipping Certified Plants using Export Certification Labels and Interfacility Stamps, controlling non-conforming product, and maintaining detailed records that verify compliance with the GCP;
- Immediately notifying the NPPO as required per Section 2.1.5 below;
- Control or eradication of pests discovered during examinations or audits;
- The effective treatment or disposal of products contaminated by plant pests in order to mitigate the risk of contamination of other products;
- Ensuring that plant identity is maintained and that only product meeting the requirements of the GCP is shipped under the GCP;
- The development and implementation of a records management and retention system that demonstrates the GCP requirements are being met; and
- Ensuring employees have the expertise and training to carry out their tasks related to the GCP.

2.1.2 Inventory Control

Authorized Facilities must have a system in place that maintains product identity within the facility. There must be sufficient information available to demonstrate that only eligible plants are used to produce Certified Plants and that only Certified Plants are shipped under an Export Certification Label or Interfacility Stamp.

2.1.2.1 Control of Non-Conforming Plants

The Authorized Facility must ensure that Non-Conforming Plants are identified, inventoried and handled in a manner that ensures they are not shipped under the GCP and they do not contaminate / infest or become mixed with plants grown and/or shipped under the GCP.

2.1.3 GCP Certification Documents

Export Certification Labels and Interfacility Stamps are used to document and maintain the status of GCP Certified Plants.

The NPPO controls the manufacture and distribution of Export Certification Labels and Interfacility Stamps within their jurisdiction and they remain the property of the authorizing NPPO, notwithstanding who may have produced or paid for them. Export Certification Labels and Interfacility Stamps must be surrendered to the NPPO in the event of suspension or cancelation of authorization.

Management at the Authorized Facility must designate an individual to maintain control of the Export Certification Labels and Interfacility Stamp. Export Certification Labels and Interfacility Stamps must be stored securely and may only be accessed and used by trained, authorized personnel.

The Authorized Facility's unique authorization number will appear on each Export Certification Label and Interfacility Stamp. Labels and Stamps must not be shared with other facilities or used for purposes other than shipping Certified Plants from the Authorized Facility's premises.

The documentation accompanying GCP shipments must include the destination, the quantity of Certified Plants and the scientific name of each plant in the consignment. Plants must be identified to genus, and the species/cultivar if required by regulation. The documentation must clearly link the Certified Plants to the Export Certification Label or Interfacility Stamp.

In the case of consignments that contain mixtures of plants in planters, hanging baskets, tropical baskets, etc., the documentation must specifically identify each individual plant taxon contained within these items. For example, the documentation could indicate 4,000 baskets containing X, Y & Z taxa.

When growing containers, (e.g. mixed planters, Christmas planters) include plants that are not eligible for the GCP, an official phytosanitary inspection is required in order to certify the plants using an Export Certification Label, or an Interfacility Stamp when the containers are being shipped to another Authorized Facility for export. A record of the official inspection must be maintained.

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

Certified Plants shipped under an Export Certification Label or Interfacility Stamp to destinations which are not Authorized Facilities lose their Certified status.

2.1.3.1 Export Certification Label

The Export Certification Label must be attached to a sheet of paper or commercial shipping document that contains the information specified in Part IV, Section 2.1.3.

A separate Export Certification Label is required for each consignee.

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

2.1.3.2 Interfacility Stamp

The Interfacility Stamp may only be applied to shipping documents for plants shipped domestically to another Authorized Facility in order to retain the Certified status of the plants under the GCP. The Interfacility Stamp informs the Authorized Facility purchasing the plants that the plants may be exported immediately using an Export Certification Label.

Stamped invoices may not include plants that do not meet the requirements of the GCP, i.e., all plants listed on a stamped invoice must be Certified Plants.

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

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

2.1.4 Records

Records provide evidence that plants grown and shipped as Certified Plants under the GCP comply with the phytosanitary requirements of the GCP. Records must be made available during audits or upon request of the NPPO.

Records must include the date that the activity was carried out, the name of the designated person that carried out the activity, specific information related to the activity, as well as additional comments or notes describing any deviations. Records may be in a variety of formats, including paper or electronic.

Records must include evidence that demonstrates the eligibility of plants to enter the GCP.

Records must include evidence that Certified Plants meet the conditions of the GCP.

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

Examples include:

- Export Certification Labels in stock;
- Export Certification Labels used, including certification documents (records of country of origin, destination, plant taxa, and volume associated with the Export Certification Label used);
- a copy of all invoices marked with the Interfacility Stamp, including originating facility, destination, plant taxa, and volume of all plants certified;
- a copy of the export invoice that references the Export Certification Label serial number and is signed and dated by the person conducting an export shipment inspection;
- list of plants produced at the Authorized Facility;
- training records for staff responsible for GCP activities;
- inspection of incoming plants;
- scouting of plants in production;
- pest detections (e.g., Pest Log);
- applied pest controls;
- inspection of Certified Plants at time of shipping;
- monitoring of production, receiving, handling, storing and shipping areas; and
- any other records and procedures sufficient for the NPPO to verify compliance with the requirements of the GCP.

2.1.5 Notifying the NPPO

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

Examples include:

- pest finds of significance. Pest finds of significance include:
 - unusual pest damage or symptoms that may indicate the presence of a new pest;
 - any pest that may be new or previously unreported from an area; or
 - detection or suspicion of the presence of a regulated pest in an exported product;
- plants received with an Export Certification label or Interfacility Stamp that do not meet the requirements of the GCP;
- Non-Conforming Plants shipped using an Export Certification Label or Interfacility Stamp;
- inappropriate use or loss of Export Certification Labels or Interfacility Stamp;
- changes to the Pest Management Plan;
- change of facility management or ownership;

- changes to the employment status or designated responsibilities of key personnel, particularly the GCP Manager; and
- facility wishes to withdraw from the GCP.

If pest finds of significance are detected, the Authorized Facility will not make shipments using an Export Certification Label or Interfacility stamp until advice is received from the NPPO.

2.1.6 NPPO Audit

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

2.2 Compliance Agreement Elements for Authorized Facility – Place of Production

2.2.1 Minimum Requirements for Greenhouse Structures and Production Practices

Plants must be monitored, managed and greenhouse-grown at the Authorized Facility. Greenhouse-grown plants are those plants produced within, under, or sheltered by structures that provide modified growing conditions and/or protection from pests and the outdoor environment. Growing conditions must include protection from pest contamination via soil, water and unmanaged plants in the surrounding environment. Structures may include greenhouses, hoop houses, screen houses, shade houses, or other structures that the NPPO determines meet the phytosanitary requirements of the GCP.

All production, receiving, handling, storing and shipping areas of the Authorized Facility must be monitored and maintained in good condition. Deficiencies in design or maintenance must be promptly identified and rectified.

Authorized Facilities must be maintained practically free from injurious pests.

2.2.1.1 Protection from Soil-borne Pests

- The growing media used for growing plants under the GCP must be free of regulated pests.
- Growing media must be managed and stored in a manner that precludes contamination by regulated pests including contamination via soil and/or water.
- Authorized Facilities located in areas where a soil-borne regulated pest occurs must develop a Pest Module describing the measures used to ensure growing media is free from the pest.
- Plants may not be planted or rooted directly in the ground.
- Plants must be produced in a manner to prevent contamination by regulated pests via soil, which may include the use of raised benches, barriers or floor coverings.
- Plants entering the continental United States or Canada in growing media from a third country, the state of Hawaii or a U.S. territory must meet the requirements of the Canadian Growing Media

Program and either the requirements of 7CFR 319.37-8 (third country) or 7CFR 318.13 (Hawaii or U.S. territory).

2.2.1.2 Irrigation; Protection from Non-irrigation Water and Water-borne Pests

- Irrigation water used for growing plants under the GCP must be clean and free from regulated pests.
- The Authorized Facility must be constructed and maintained in a manner that protects plants from non-irrigation water sources, including prevention of flooding and accumulation of standing water. Preventative practices may include raised benches, barriers or floor coverings.
- Authorized Facilities located in areas where a water-borne regulated pest occurs must develop a Pest Module describing the measures used to ensure irrigation water is free from the pest.

2.2.1.3 Buffers and Protection from Unmanaged Plants/Areas

- The production and handling areas must be kept free of weeds and unmanaged plants.
- A pest exclusion barrier is required around the production and handling areas.
- A 3 metre / 10 foot buffer that is maintained free of weeds and unmanaged plants may be utilized in lieu of a pest exclusion barrier.

2.2.1.4 Separation of Ineligible Plants

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

2.2.1.5 Separation of plants that have not completed the growth and monitoring period

- Plants that have not completed the growth and monitoring period should be separated from Certified Plants in a manner commensurate with the pest risk associated with the taxa and source.
- The NPPO may require additional safeguarding to be included in the Pest Management Plan depending on the plant taxa and source.

2.2.1.6 Exemption for Outdoor Production

Authorized Facilities may apply in writing to their NPPO to request an exemption from the requirements for plants to be exclusively greenhouse-grown. The proposal process is outlined in Part II, Section 4.2.2.

The outdoor production area must meet all the requirements listed in Section 2.2.1 above, except the requirement for a greenhouse structure. The NPPO will review the request and inspect the outdoor production area. The NPPO may authorize outdoor growth for the production of specific Certified Plants, at its discretion.

If an exemption is granted, the Pest Management Plan must include a Production Module describing the outdoor production area and the conditions recognized by the NPPO.

2.2.2 List of Plants in Production

Authorized Facilities must maintain a current list of plants in production at the facility. The information in the plant list is used by the Authorized Facility to determine whether plants in production are eligible or not eligible. Plants must originate in either Canada or the United States, or if imported from a third country, they must be enterable into both the United States and Canada as per each country's phytosanitary regulations.

The list must include:

- taxa (see 2.2.2.1);
- source (see 2.2.2.2);
- description of plants (see 2.2.2.3);
- when the source is other than the continental United States or Canada, a notation if there are specific phytosanitary import requirements and a description of plants when they enter Canada or the continental United States (see 2.2.2.4); and
- a notation whether the plants are eligible or ineligible for the GCP.

The list must be accepted by the exporting country's NPPO. The NPPO may be consulted for guidance on how to assess eligibility.

2.2.2.1 Taxa

The minimum information to indicate plant taxa is genus. The species/cultivar must be included if required by the regulations of either NPPO.

2.2.2.2 Source

The minimum information to indicate source is country name. U.S. origins other than the continental United States must be specified.

- Plants entering the Authorized Facility accompanied by an Export Certification Label or an Interfacility Stamp are Certified Plants. For the purpose of the plant list, the source is considered to be Canada or the United States, depending where the GCP document was issued.
- Plants propagated at the Authorized Facility from cuttings with a country of origin of the continental United States or Canada or seed are recorded as sourced from the country where the Authorized Facility is located.
- Plants entering the Authorized Facility with a CFIA or USDA issued phytosanitary certificate indicating a place of origin of the United States or Canada are recorded as sourced from the place of origin declared on the phytosanitary certificate.
- Plants entering the Authorized Facility from other than the continental United States or Canada are recorded as sourced from the place of origin declared on the accompanying phytosanitary documentation.

- Plants entering the Authorized Facility from a non-GCP facility in Canada or the continental United States are recorded as sourced from the country that would be declared as the place of origin if a phytosanitary certificate or re-export phytosanitary certificate were immediately issued for export.

2.2.2.3 Description of Plants

The description of plants must include the growth stage and form of incoming plants, e.g., seed, in-vitro/tissue culture plantlets, cuttings, plugs, bare-root plants, or pre-finished plants. A specific notation must be made if plants are received in growing medium from other than the continental United States or Canada.

2.2.2.4 Specific Phytosanitary Import Requirements

When there are specific phytosanitary import requirements, declarations, restrictions or prohibitions for either Canada or the United States, this must be noted in the plant list. The note does not have to include a description of the specific phytosanitary provision; however, there should be enough information to remind the Authorized Facility that special provisions are required.

2.2.3 Eligible Plants

The Authorized Facility must maintain records that demonstrate the eligibility of plants to enter the GCP. Records must include the source of plants (e.g., including supplier, country/ state/ province) and must clearly show the date and growth stage at the time plants entered the Authorized Facility and the date and growth stage of all Certified Plants at the time they were shipped from the Authorized Facility. Records must also indicate that eligible plants imported from third countries met U.S. size/age requirements (7 CFR 319.37-2(b)) at the time they entered Canada or the continental United States.

2.2.4 GCP Manager

The GCP Manager is responsible for ensuring that;

- facilities are monitored and maintained per Section 2.2.1 above; and
- plants are inspected and production areas are scouted to verify freedom from regulated pests.

2.2.5 Pest Detection and Pest Control

If regulated pests are detected, steps must be taken immediately to manage them and ensure compliance with the phytosanitary requirements of the GCP.

The Authorized Facility must maintain records for activities related to pest scouting, plant inspections, control procedures, pest identifications and laboratory submissions.

Different pest control strategies may be employed to meet the phytosanitary requirements. These strategies may include: cultural controls, biological controls, and chemical controls.

2.2.5.1 Incoming Plants

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

2.2.5.2 Examination of Production Areas

Scouting must be carried out in all production areas of the Authorized Facility at a minimum of two week intervals. Scouting activities must be documented and are subject to confirmation by Auditors.

Scouting must be carried out by designated personnel according to the methods, frequency and intensity specified in the Pest Management Plan. In addition to visual inspection, other pest detection methods may be used to provide early warning of pest infestations (e.g., yellow sticky traps, pheromone traps, etc.).

2.2.5.3 Shipping Inspection of Certified Plants

Certified Plants shipped under an Export Certification Label or Interfacility Stamp must be inspected by designated personnel to verify that the plants in the shipment are free of regulated pests.

It must be verified that all plants shipped under an Export Certification label or Interfacility Stamp are Certified Plants.

2.2.6 Pest Management Plan

An Authorized Facility must develop a Pest Management Plan using the template in Appendix I (see also Part II, Section 6). The Pest Management Plan must be submitted to the NPPO for review and acceptance, as part of the facility's GCP application package. The procedures described in the Pest Management Plan must be implemented at the Authorized Facility and appropriate records must be available for review by the NPPO.

The Pest Management Plan must be revised to ensure it remains current. The Authorized Facility must notify their NPPO whenever the Pest Management Plan is amended. The NPPO will assess the revised Pest Management Plan to verify that the GCP phytosanitary requirements continue to be met.

2.2.7 Modules

Modules must be reviewed and accepted by the NPPO responsible for authorizing the facility.

2.2.7.1 Pest Modules

Pest Modules are required when there is a regulated pest present in the area where the authorized facility is located AND there are plants in production that could be a pathway for the regulated pests, whether or not those plants are being grown under the GCP and are intended for export.

Pest Modules must describe the specific measures to prevent the spread of regulated pests via GCP plants, including any inspection, sampling, testing, treatments, cultural practices or other measures in place. Pest

Modules are always required when a phytosanitary certificate would require an additional declaration for export of the same plants.

Authorized facilities must work with their respective NPPO to determine any pest mitigation measure that may be required.

2.2.7.2 Production Modules

Production modules are required when the Authorized Facility has been granted an exemption from a provision of the GCP, when the facility incorporates Associated Articles in the GCP or when the NPPO determines that specific measures are required for a specific origin and/or plant taxon.

The measures described in the module may be proposed by the Authorized Facility and accepted by the NPPO or may be determined by the NPPO.

2.3 Compliance Agreement Elements for Authorized Facility – Plant Broker

Plant Brokers ship plants produced by other Authorized Facilities. Plant Brokers do not produce, transform or grow plants. Plant Brokers that produce, transform or grow plants may only be authorized as a Place of Production.

2.3.1 Minimum Requirements for Broker Structures

Plant Broker facilities must be designed and maintained in a manner that protects Certified Plants from pest contamination via soil, water and unmanaged plants.

- Storage and handling areas must be kept free of weeds and unmanaged plants.
- A pest exclusion barrier is required around the production and handling areas.
- A 3 metre / 10 foot buffer that is maintained free of weeds and unmanaged plants may be utilized in lieu of a pest exclusion barrier.

2.3.2 Examination of Shipping Areas and Certified Plants

The GCP Manager is responsible for the monitoring of shipping and storage areas, reporting pest detections and implementing pest control measures when pests are detected.

It must be verified that all plants shipped under an Export Certification Label or Interfacility Stamp are Certified Plants.

PART V - Appendices

Appendix 1 Pest Management Plan Guidance and Template

GCP Technical Requirements, Part I, Section 4.0 Glossary: Pest Management Plan: A written description of procedures or processes designed to control, suppress or eradicate pest populations and produce plants that meet the phytosanitary requirements of the GCP.

The Pest Management Plan is a consistent, uniform way for the Authorized Facility to communicate to the NPPO how specific elements of the Compliance Agreement will be conducted and/or achieved. This template is designed so when the Authorized Facility has provided the required information in the individual fields, the Pest Management Plan should be complete.

The reference numbers in the Pest Management Plan refer to the Compliance Agreement elements in Part IV of the GCP Technical Requirements which should be referred to when the Pest Management Plan is being completed. Not every element of the Compliance Agreement is required to be detailed in the Pest Management Plan; however, the Authorized Facility must be able to demonstrate to the auditor that all elements of the Compliance Agreement are achieved whether the details are in the pest management plan or not.

The NPPO may stipulate specific safeguarding or pest mitigation measures to be included in the Pest Management Plan.

Information in the Pest Management Plan may be in bullet points and may include or reference as appropriate, maps, pictures, documents and other published information.

The Pest Management Plan must be typewritten and signed by the GCP Manager.

- Title Page -

GCP Pest Management Plan

Facility Name

GCP Authorization Number

Date

General

Mailing Address		Physical Address <input type="checkbox"/> <i>same as mailing address</i> <input type="checkbox"/> <i>location map attached</i>
Phone	Facs	Email

Brief description of the business, e.g., propagation of plants from seed for sale as pre-finished plants, propagation of ornamental plants from domestic and offshore cuttings for distribution to retail etc.

Prepared by:
Name of author

GCP Manager

name	signature	date
------	-----------	------

- next page(s): amendment record, personnel and regulated pests -

Amendment Record

No.	Amended Section and Content	Approved by:	Date:	NPPO Notified

Management, designated personnel and key functions

Owner	
GCP Manager	
Alternate GCP Manager	

Regulated pests present in area/ Regulated pests triggering an additional declaration if a phytosanitary certificate were issued (Supplied by NPPO)

Regulated Pest (Scientific and local common name)	Host plants in production	Module required (Y/N)

- next page(s) -

2.1.2 Inventory Control

Briefly describe how Certified Plants, Non-Conforming Plants and Ineligible Plants are differentiated in the Authorized Facility

2.2.1 Minimum Requirements for Greenhouse Structures and Production Practices

*Describe the facility, including a description of physical structure, e.g. glasshouse, screenhouse etc. and the area under production.
Include a map or diagram of the facility.
All locations for handling plants, e.g., receiving, propagation, coolers, etc
The description of the various parts of the facility may be shown on the map or diagram.
Pictures, aerial photographs etc. may be used for clarity.*

2.2.1.1 Protection from Soil-borne Pests

*Describe all media used in the production of plants, including manufacturer.
Note: If there are regulated soil-borne pests in the area where the facility is located, the management practices to prevent contamination are included in 2.2.7.1 Pest Modules*

2.2.1.2 Irrigation; Protection from Non-irrigation Water and Water-borne Pests

*Describe the source of irrigation water and any treatment if applicable.
Note: If there are regulated water-borne pests in the area where the facility is located, the management practices to prevent contamination are included in 2.2.7.1 Pest Modules*

2.2.1.3 Buffers and Protection from Unmanaged Plants/Areas

Describe any buffer areas around the facility and how they are managed.

2.2.1.4 Separation of Ineligible Plants

*State if eligible and ineligible plants of the same taxa grown at the facility.
If yes, describe the system used to maintain plant identity and manage pest risk, including any measures required by the NPPO.*

2.2.1.5 Separation of plants that have not completed the growth and monitoring period

If the NPPO requires specific measures, include them here.

2.2.1.6 Exemption for Outdoor Production

*Describe any authorized outdoor production area(s) in relation to the Authorized Facility.
The authorized outdoor production area(s) should be shown on the facility map or diagram.
Include reference to the authorization provided by the NPPO.*

2.2.2 List of Plants in Production

Briefly describe how you determine that plants entering the Authorized Facility are Eligible Plants.

2.2.5 Pest Detection and Pest Control

*Describe the actions taken when there is a pest find of significance, including notification per Part IV, Section 2.1.5 of the GCP Technical Requirements.
Describe the activity records maintained related to pest scouting, plant inspections, control procedures, pest identifications and laboratory submissions.*

2.2.5.1 Incoming Plants

Describe the receiving process for incoming plants, including pest detection methods. Include a reference to where a list of designated personnel may be found.

2.2.5.2 Examination of Production Areas

Describe procedures and practices for pest detection, including official pest scouting, frequency, intensity, pest detection methods, etc. Include a reference to where a list of designated personnel may be found.

Describe how scouting activities are documented.

2.2.5.3 Shipping Inspection of Certified Plants

Describe the inspection procedure, including pest detection methods. Include a reference to where a list of designated personnel may be found.

Describe the process for verifying that plants shipped under and Export Certification Label or Interfacility Stamp are Certified Plants.

2.2.7.1 Pest Modules

Describe how pest information is shared with appropriate staff, including life cycle, distribution, damage, host(s), identification guide, pictures, etc.

Describe control strategy(ies) used to prevent spread of each specific regulated pest.

2.2.7.2 Production Modules

State if the facility has been granted an exemption from a provision of the GCP

If yes, Describe the additional risk mitigation measures.

State if the facility certifies Associated Articles with an Export Certification Label or Interfacility Stamp.

If yes, Describe the process for ensuring that Associated Articles are enterable into both the United States and Canada and maintaining identity while in the Authorized Facility.

State if the NPPO requires additional safeguarding to be included in the pest management plan.

If yes, describe the additional safeguarding required by the NPPO.

Appendix 2 Regulated Plant Pests

The following are lists of regulated pests that may trigger the need for a Pest Module for particular host plants in areas where these pests are known to occur. This list is not exhaustive and is subject to change. Pests of regulatory significance that do not appear on this list may also require a Pest Module. The decision to require a Pest Module is at the discretion of the NPPO.

The NPPO will use this list and the known distribution of these pests in conjunction with Part II, Section 7.1 Pest Modules in determining if a Pest Module is required.

Pests that are new to Canada and/or the continental United States are generally considered to be regulated until their regulatory status has been evaluated. The NPPO should be contacted for confirmation and/or further information.

Entomology

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

<i>Scirtothrips dorsalis</i>	chilli thrips, yellow tea thrips
<i>Sirex noctilio</i>	sirex wasp
<i>Solenopsis invicta</i>	imported fire ant
<i>Solenopsis richteri</i>	imported fire ant
<i>Tetropium fuscum</i>	brown spruce longhorn beetle
<i>Tomicus piniperda</i>	pine shoot beetle

Pathology

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

Other Pests

Scientific Name	Common Name
<i>Arion vulgaris</i>	Spanish slug
<i>Candidula intersepta</i>	wrinkled snail
<i>Ceruella virgata</i>	white snail
<i>Cochlicella acuta</i>	pointed snail
<i>Cornu aspersum</i> (<i>Helix aspersa</i>)	European brown garden snail
<i>Hygromia cinctella</i>	girdled snail
<i>Lissachatina fulica</i> (<i>Achatina fulica</i>)	giant African snail
<i>Microxeromagna lowei</i>	small brown snail
<i>Monacha cantiana</i>	Kentish snail
<i>Monacha cartusiana</i>	Carthusian snail
<i>Monacha syriaca</i>	Hygromiid snail
<i>Ovachlamys fulgens</i>	jumping snail
<i>Prietocella barbara</i>	banded conical snail

Technical Requirements
United States-Canada Greenhouse-Grown Plant Certification Program

Version 1.0

June 23 2016

Sarasinula plebeia	Caribbean leatherleaf slug
Theba pisana	white snail, milk snail
Xerolenta obvia	eastern heath snail
Xeropicta spp	small land snail

Appendix 3 Application to Participate in the United States-Canada Greenhouse-Grown Plant Certification Program (GCP)

If your facility has a current greenhouse certification program number, please enter it here →	
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Authorized Facility – Place of Production or **Authorized Facility – Plant Broker**

Facility and Contact Information

Name of Company/ Facility		Reserved GCP Authorization Number (<i>completed by NPPO</i>)
<i>Note: the following will be used by (the NPPO) to contact the facility regarding the GCP</i>		
Mailing Address		Physical Address (<i>include all locations</i>)
		<input type="checkbox"/> <i>same as mailing address</i>
Phone	Fax	Email

Owner of Company/ Facility	
Phone	Email

GCP Manager	
Phone	Email

Applicant’s Declaration

Applicant	
Position in Company/ Facility	
Phone	Email

Declaration

I [*applicant name*] the owner/ operator/ manager of [*facility name*] declare:

- I am the person who will sign a Compliance Agreement with [*the NPPO*];

- I own, operate or manage a [*Place of Production/ Plant Broker*] facility located in [*the United States/ Canada*];
- I have reviewed and understand the program requirements of the GCP and the elements of the GCP Compliance Agreement;
- A qualified individual has been designated to be the GCP Manager;
- I will develop and implement procedures that meet the requirements of the Compliance Agreement for an Authorized Facility;
- I will participate in the Authorization Audit and demonstrate that all the components of the GCP Compliance Agreement have been implemented at the facility; and
- I will complete any corrective action requests identified during the Authorization Audit.

Additional Declaration for Place of Production

- I understand the following must be completed and submitted for acceptance by (*the NPPO*) before the Authorization Audit can take place:
 - A current list of plants grown at the facility will be submitted (*GCP Technical Requirements Part IV, Section 1.2*); and
 - A written Pest Management Plan will be developed and implemented (*GCP Technical Requirements Part V, Appendix 1*).

Application

I apply for [*facility name*] to participate in the United States-Canada Greenhouse-grown Plant Certification Program.

Applicant Name (please print)	Signature	Date

NPPO Administrative use only

Authorization Tracking

	Date Received/Conducted	Accepted/Completed	Verified by:
Application			
Taxa/origin list			
Pest Management Plan			
Authorization Audit			
Compliance Agreement			

Appendix 4 Audit Checklist – Authorized Facility – Place of Production

The following are the elements of an Audit checklist for an Authorized Facility – Place of Production based on GCP Technical Requirements, Part IV, Sections 2.1 and 2.2.

The audit checklist elements may be rearranged or consolidated as required to suit the audit process of the NPPO.

Auditors are reminded that the audit checklist elements in this appendix are abbreviations of the elements of the Compliance Agreement, and when interpretation is required, auditors should refer to the Compliance Agreement.

GCP Manager and Designated Staff (*Part IV, Section 2.1.1*)

- A GCP Manager and an alternate have been appointed who are responsible for meeting all requirements of the GCP
- The GCP Manager has the authority and responsibility to develop and implement procedures that meet the requirements of the GCP
- Individuals designated to carry out GCP tasks have adequate, skills, knowledge, training and authority
- GCP Manager responsibilities
 - Sourcing eligible plants
 - Maintaining product identity
 - Shipping Certified Plants with Export Certification Labels and Interfacility Stamps
 - Controlling non-conforming product
 - Notifying the NPPO
 - Control or eradication of pests
 - Effective treatment or disposal of contaminated products
 - Effective mitigation of contamination by pests
 - Maintaining plant identity
 - Only shipping products under the GCP that meet the requirements of the GCP
 - Records management that maintains records that demonstrate GCP requirements are met
 - Ensuring employees have expertise and training

Inventory Control (*Part IV, Section 2.1.2*)

- A system is in place that maintains product identity within the facility
- There is sufficient information to demonstrate that only eligible plants are used to produce Certified Plants
- There is sufficient information to demonstrate that only Certified Plants are shipped under an Export Certification Label or Interfacility Stamp

Control of Non-Conforming Plants (*Part IV, Section 2.1.2.1*)

- Non-Conforming Plants are identified, inventoried and handled in a manner that ensures they are not shipped under the GCP

- Non-Conforming Plants do not contaminate, infest or become mixed with plants grown/ shipped under the GCP

GCP Certification Documents (*Part IV, Section 2.1.3*)

- Export Certification Labels and Interfacility Stamps are surrendered upon suspension or cancellation of authorization
- An individual is designated to maintain control of Export Certification Labels and Interfacility Stamps
- Export Certification Labels and Interfacility Stamps are securely stored
- Export Certification Labels and Interfacility Stamps are only accessed and used by authorized personnel
- Export Certification Labels and Interfacility Stamps are not shared with other facilities
- Export Certification Labels and Interfacility Stamps are not used for purposes other than shipping plants from the Authorized Facility's premises
- The documentation accompanying each GCP shipment lists the destination, quantity of Certified Plants and the scientific name of each plant
- The genus, species and/or variety of the plants in a shipment is indicated on the shipping documents, as appropriate
- Documentation clearly links the Certified Plants to the Export Certification Label or Interfacility Stamp
- Documentation for mixed planters, hanging baskets, tropical baskets, etc. includes identification of plant taxa
- When mixed planters include plants that are not eligible there is an official phytosanitary inspection conducted and kept on record
- NPPO is notified if Export Certification Labels or Interfacility Stamps are lost or stolen

Export Certification Label (*Part IV, Section 2.1.3.1*)

- The Export Certification Label is affixed to an appropriate document with the specified information
- A separate Export Certification Label is used for each consignee
- Export Certification Labels are not used for shipments within the country where the Authorized Facility is located

Interfacility Stamp (*Part IV, Section 2.1.3.2*)

- The Interfacility Stamp is only applied to shipping documents for plants shipped domestically to another Authorized Facility
- Stamped invoices do not include plants which are not Certified Plants

Records (*Part IV, Section 2.1.4*)

- Records are available during audits
- Records include the date of the activity, signature of designated person, specific information related to the activity, comments, and notes describing any deviations
- Records demonstrate the eligibility of plants to enter the GCP

- Records demonstrate that Certified Plants meet the conditions of the GCP
- Records, including shipping documents are maintained for a minimum of three (3) years

Notifying the NPPO (*Part IV, Section 2.1.5*)

- The NPPO is notified when conditions occur which could be considered a critical non-compliance
- The NPPO is notified when there are changes in management or personnel
- When there is a pest find of significance, shipping of Certified Plants is stopped until advice is received from the NPPO

NPPO Audit (*Part IV, Section 2.1.6*)

- The GCP Manager is present for the NPPO audit
- The Authorized Facility cooperates with the auditor
- The auditor is allowed to collect and record information

Minimum Requirements for Greenhouse Structures and Production Practices (*Part IV, Section 2.2.1*)

- Plants are monitored, managed and greenhouse-grown **Note:** *be aware of any exemptions detailed in the Pest Management Plan*
- Growing conditions include protection from pest contamination via soil, water and unmanaged plants
- Production, receiving, handling, storing and shipping areas are monitored and maintained in good condition
- Deficiencies in design or maintenance are promptly identified and rectified
- Facilities are maintained practically free from injurious pests

Protection from Soil and Soil-borne Pests (*Part IV, Section 2.2.1.1*)

- Growing media is free from regulated pests
- Growing media is managed to preclude contamination by regulated pests
- When soil-borne pests are present, Pest Module describes measures to ensure growing media is free from regulated pests
- When regulated soil-borne pests are present, Pest Module describes measures to ensure irrigation water is free from regulated pests
- Plants are not planted or rooted directly in the ground
- Plants are protected from contamination by regulated pests via soil
- Plants entering in growing media from other than the continental United States or Canada meet the requirements of both jurisdictions' growing media programs

Irrigation and Protection from Non-irrigation Water and Water-borne Pests (*Part IV, Section 2.2.1.2*)

- Irrigation water is clean and free from regulated pests
- Plants are protected from non-irrigation water sources
- Facility is constructed and maintained to prevent flooding and standing water

- When regulated water-borne pests are present, Pest Module describes measures to ensure irrigation water is free from regulated pests

Buffers and Protection from Unmanaged Plants/Areas (*Part IV, Section 2.2.1.3*)

- Production and handling areas are free from weeds and unmanaged plants
- A pest exclusion barrier is present or a buffer is maintained free from weeds and unmanaged plants

Separation of Ineligible Plants (*Part IV, Section 2.2.1.4*)

- A system is in place to identify and segregate eligible and ineligible plants of the same taxa
- Additional safeguarding is detailed in the Pest Management Plan if required by the NPPO

Separation of plants that have not completed the growth and monitoring period (*Part IV, Section 2.2.1.5*)

- Plants that have not completed the growth and monitoring period are separated in a manner commensurate with pest risk
- Additional safeguarding is detailed in the Pest Management Plan if required by the NPPO

Exemption for Outdoor Production (*Part IV, Section 2.2.1.6*)

- Outdoor growth has been authorized by the NPPO.
- Outdoor production area meets all requirements of 2.2.1 other than the requirement for a greenhouse structure
- If an exemption has been granted, a Production Module, describing the outdoor production area and mitigation measures is included in the Pest Management Plan

List of Plants in Production (*Part IV, Section 2.2.2*)

- A current list of all plants in production at the facility is maintained
- Plants originate in Canada or the continental United States, or are enterable into both countries
- The list includes taxa, source, description of plants
- There is a note if there are specific phytosanitary import requirements
- There is a description of plants that enter Canada or the continental United States from a third country
- There is a note whether plants are eligible or ineligible for the GCP

Taxa (*Part IV, Section 2.2.2.1*)

- Taxa are described to genus and species/cultivar if required by legislation

Source (*Part IV, Section 2.2.2.2*)

- Country name is indicated

Description of Plants (*Part IV, Section 2.2.2.3*)

- Description includes growth stage and form of incoming plants
- There is a note when plants are imported in growing media from a third country

Specific Phytosanitary Import Requirements (*Part IV, Section 2.2.2.4*)

- There is a note when there are specific phytosanitary import requirements

Eligible Plants (*Part IV, Section 2.2.3*)

- Records are maintained to demonstrate eligibility
- Records include source of plants
- Records include date and growth stage when plants enter facility
- Records include date and growth stage when Certified Plants are shipped
- Records indicate that plants from third countries meet U.S. size-age requirements at the time of entry to Canada or the continental United States

GCP Manager (*Part IV, Section 2.2.4*)

- GCP Manager ensures that facilities are monitored and maintained
- GCP Manager ensures that plants are inspected and production areas scouted

Pest Detection and Control (*Part IV, Section 2.2.5*)

- Control measures are taken immediately when regulated pests are detected
- Records are maintained related to scouting, inspections, control procedures, pest identification and laboratory submissions

Incoming Plants (*Part IV, Section 2.2.5.1*)

- Incoming plants are inspected prior to moving into production areas

Examination of Production Areas (*Part IV, Section 2.2.5.2*)

- Scouting is carried out in all production areas at a minimum two week interval
- Scouting activities are documented
- Scouting is carried out as specified in the Pest Management Plan

Shipping Inspection of Certified Plants (*Part IV, Section 2.2.5.3*)

- Certified Plants are inspected to verify freedom from regulated pests
- Plants shipped under an Export Certification Label or Interfacility Stamp are verified to be Certified Plants

Pest Management Plan (*Part IV, Section 2.2.6*)

- Pest Management Plan has been developed using the template in Appendix I
- Pest Management Plan has been submitted to the NPPO for review and acceptance
- The procedures have been implemented and are documented for review.
- The NPPO is notified when the Pest Management Plan is updated

Modules (*Part IV, Section 2.2.7*)

- Modules have been reviewed and accepted by the NPPO
- Modules are incorporated into the Pest Management Plan

Pest Modules (*Part IV, Section 2.2.7.1*)

- Pest Modules are in place for all plants that are considered hosts of regulated pests that are known to occur in the area
- Pest Modules describe the specific measures to prevent the spread of regulated pests
- Pest Modules are in place for plants which would require an additional declaration if a phytosanitary certificate was issued
- The facility worked with the NPPO to determine appropriate pest mitigation measures

Production Modules (*Part IV, Section 2.2.7.2*)

- Production Modules are in place for all situations where the NPPO has granted an exemption to allow outdoor production or an exemption to the minimum growth period
- The measures described in the Production Module have been accepted or determined by the NPPO

Appendix 5 Audit Checklist – Authorized Facility – Plant Broker

The following are the elements of an Audit checklist for an Authorized Facility – Plant Broker based on GCP Technical Requirements, Part IV, Sections 2.1 and 2.3.

The audit checklist elements may be rearranged or consolidated as required to suit the audit process of the NPPO.

Auditors are reminded that the audit checklist elements in this appendix are abbreviations of the elements of the Compliance Agreement and when interpretation is required, auditors should refer to the Compliance Agreement.

GCP Manager and Designated Staff (*Part IV, Section 2.1.1*)

- A GCP Manager and an alternate have been appointed who are responsible for meeting all requirements of the GCP
- The GCP Manager has the authority and responsibility to develop and implement procedures that meet the requirements of the GCP
- Individuals designated to carry out GCP tasks have adequate, skills, knowledge, training and authority
- GCP Manager responsibilities
 - Sourcing eligible plants
 - Maintaining product identity
 - Shipping Certified Plants with Export Certification Labels and Interfacility Stamps
 - Controlling non-conforming product
 - Notifying the NPPO
 - Control or eradication of pests
 - Effective treatment or disposal of contaminated products
 - Effective mitigation of contamination by pests
 - Maintaining plant identity
 - Only shipping products under the GCP that meet the requirements of the GCP
 - Records management that maintains records that demonstrate GCP requirements are met
 - Ensuring employees have expertise and training

Inventory Control (*Part IV, Section 2.1.2*)

- A system is in place that maintains product identity within the facility
- There is sufficient information to demonstrate that only eligible plants are used to produce Certified Plants
- There is sufficient information to demonstrate that only Certified Plants are shipped under an Export Certification Label or Interfacility Stamp

Control of Non-Conforming Plants (*Part IV, Section 2.1.2.1*)

- Non-Conforming Plants are identified, inventoried and handled in a manner that ensures they are not shipped under the GCP

- Non-Conforming Plants do not contaminate, infest or become mixed with plants grown/ shipped under the GCP

GCP Certification Documents (*Part IV, Section 2.1.3*)

- Export Certification Labels and Interfacility Stamps are surrendered upon suspension or cancellation of authorization
- An individual is designated to maintain control of Export Certification Labels and Interfacility Stamps
- Export Certification Labels and Interfacility Stamps are securely stored
- Export Certification Labels and Interfacility Stamps are only accessed and used by authorized personnel
- Export Certification Labels and Interfacility Stamps are not shared with other facilities
- Export Certification Labels and Interfacility Stamps are not used for purposes other than shipping plants from the Authorized Facility's premises
- The documentation accompanying each GCP shipment lists the destination, quantity of Certified Plants and the scientific name of each plant
- The genus, species and/or variety of the plants in a shipment is indicated on the shipping documents, as appropriate
- Documentation clearly links the Certified Plants to the Export Certification Label or Interfacility Stamp
- Documentation for mixed planters, hanging baskets, tropical baskets, etc. includes identification of plant taxa
- When mixed planters include plants that are not eligible, there is an official phytosanitary inspection conducted and kept on record
- NPPO is notified if Export Certification Labels or Interfacility Stamps are lost or stolen

Export Certification Label (*Part IV, Section 2.1.3.1*)

- The Export Certification Label is affixed to an appropriate document with the specified information
- A separate Export Certification Label is used for each consignee
- Export Certification Labels are not used for shipments within the country where the Authorized Facility is located

Interfacility Stamp (*Part IV, Section 2.1.3.2*)

- The Interfacility Stamp is only applied to shipping documents for plants shipped domestically to another Authorized Facility
- Stamped invoices do not include plants which are not Certified Plants

Records (*Part IV, Section 2.1.4*)

- Records are available during audits
- Records include the date of the activity, signature of designated person, specific information related to the activity, comments, and notes describing any deviations
- Records demonstrate the eligibility of plants to enter the GCP

- Records demonstrate that Certified Plants meet the conditions of the GCP
- Records, including shipping documents are maintained for a minimum of three (3) years

Notifying the NPPO (*Part IV, Section 2.1.5*)

- The NPPO is notified when conditions occur which could be considered a critical non-compliance
- The NPPO is notified when there are changes in management or personnel
- When there is a pest find of significance, shipping of Certified Plants is stopped until advice is received from the NPPO

NPPO Audit (*Part IV, Section 2.1.6*)

- The GCP Manager is present for the NPPO audit
- The Authorized Facility cooperates with the auditor
- The auditor is allowed to collect and record information

Minimum Requirements for Broker Structures (*Part IV, Section 2.3.1*)

- Facility design includes protection from pest contamination via soil, water and unmanaged plants
- Storage and handling areas free of weeds and unmanaged plants
- Buffer is maintained free from weeds and unmanaged plants or the NPPO has authorized a pest exclusion barrier

Appendix 6 Auditor's Guide – Classification of Observed Non-compliance

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

Critical Non-Compliance

- Certified a plant that did not meet the requirements of the GCP.
- Certified a plant that was not Eligible.
- Appropriate modules are not in place.
- Certified a plant that did not meet Pest Module or Production Module specifications.
- Certified a plant that was infested with a regulated pest.
- Failed to notify NPPO of pest finds of significance (atypical or uncommon pest damage or symptoms observed, new pest detected or regulated pest suspected).
- Failed to control a regulated pest.
- Provided Export Certification Labels or Interfacility Stamps to a person not designated by the facility or for use by a non-Authorized Facility.
- Failed to make records available to the NPPO.
- Authorized facility is operating without a GCP Manager.
- Two or more Major non-compliances detected during a single audit.
- Export Certification Label or Interfacility Stamp issued for a shipment of GCP plants with Associated Articles that do not meet the requirements of the GCP.

Major Non-Compliance

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

Minor Non-Compliance

- There is insufficient trained staff to consistently maintain the GCP.
- Records are not completed or maintained in accordance with the Compliance Agreement.
- Failure to secure Export Certification Labels and/or Interfacility Stamps.

Technical Requirements

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- Staff members are not aware of the applicable GCP requirements related to their duties.
- Pest Management Plan is not up-to-date.

Appendix 7 Corrective Action Request

Suggested corrective action request template

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