Canadian Food Inspection Agency
Agence canadienne d'inspection des aliments

# D-16-02: United States – Canada Greenhouse-Grown Plant Certification Program

**Effective date: tba**
**(Original)**

This directive describes the administrative requirements of the Technical Requirements, United States – Canada Greenhouse-Grown Plant Certification Program (GCP), a bilateral export certification program for greenhouse-grown plants shipped between Canada and the continental United States.

The GCP and this directive must be used together.

This directive includes an annex regarding the transition of facilities approved under the Canadian Greenhouse Certification Program (CGCP) to the GCP. At the end of the transition period, D-96-12 *Greenhouse Certification Program for Export of Greenhouse-grown plants to the United States* will be cancelled and the annex will be removed from D-16-02.

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## 1.0 Legislative authority

*Plant Protection Act* (S.C. 1990, c. 22)

*Plant Protection Regulations* (SOR/95-212)

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

*Canadian Food Inspection Agency Fees Notice*, *Canada Gazette, Part I* (as amended from time to time)

## 2.0 Definitions, abbreviations and acronyms

Definitions of terms used in this document are found in the Technical Requirements, United States – Canada Greenhouse-Grown Plant Certification Program (GCP), the International Standard for Phytosanitary Measures 5: Glossary of phytosanitary terms, and the Plant Health Glossary of Terms.

GCP: Technical Requirements, United States – Canada Greenhouse-Grown Plant Certification Program.

For the purpose of this directive, in the event of differences in the definition of individual terms, the definition in the GCP glossary will prevail.

## 3.0 Introduction

The United States – Canada Greenhouse-Grown Plant Certification Program (GCP) is a bilateral export certification agreement that permits Authorized Facilities to utilize an Export Certification Label in lieu of a CFIA issued phytosanitary certificate for shipments of plants moving between Canada and the continental United States.

Both Canada and the United States require phytosanitary certification for plants moving between the two countries to certify that consignments are free from regulated pests. Plants produced and shipped under the GCP are free from regulated pests and meet the phytosanitary import requirements of Canada and the United States.

The GCP is systems approach that is audited by CFIA. Integrated pest risk management measures are used for the production and certification of plants that move in trade between Canada and the continental United States.

In Canada, the GCP replaces D-96-12: Greenhouse Certification Program for Export of Greenhouse-grown plants to the United States (CGCP) that was established in 1996.

The GCP is a bilateral arrangement between CFIA and APHIS that details the requirements for facilities to be authorized to ship greenhouse-grown plants under an export certification label in lieu of a phytosanitary certificate for plants shipped between the continental United States and Canada.

The GCP and this directive must be used together. With the exception of high level statements to link the GCP with the administrative requirements, the details of the GCP Technical Requirements are not repeated in this directive.

## 4.0 Scope

### 4.1 Regulated pests

The GCP is designed to prevent the spread of all pests regulated by APHIS and CFIA via GCP

Certified Plants.

Pests that are new to Canada and/or the continental United States are considered regulated for the purpose of the GCP until their regulatory status is determined. A pest is considered to be new when it is present in an area where it has not previously been known to exist.

### 4.2 Regulated articles

The GCP is an export certification option for greenhouse-grown plants for planting that are enterable into the United States and Canada as per both countries' phytosanitary regulations. The GCP includes exemption provisions for the growth and monitoring period and for outdoor production. There is provision for certification of Associated Articles that would otherwise require a separate phytosanitary certificate in addition to an Export Certification Label. All plants in production at an authorized facility are subject to the requirements of the GCP, whether eligible to become a GCP Certified Plant or not.

### 4.3 Regulated areas

Plants for planting may be entered into the GCP from any country of the world, provided that the plants are enterable into both Canada and the United States.

## 5.0 General requirements

Plants that can meet the phytosanitary import requirements of both Canada and the United States are eligible to be produced in and distributed under the GCP.

In Canada, facilities entering into a compliance agreement with the CFIA and maintaining their facilities in accordance with the GCP are authorized to use an Export Certification Label in lieu of a CFIA issued phytosanitary certificate for the export certification of greenhouse-grown plants to the United States and to maintain the Certified status of plants shipped to other GCP facilities in Canada using an Interfacility Stamp.

### 5.1 Clarification of specific elements of the GCP

A key objective of the GCP is consistent, equivalent application of the GCP Technical Requirements at Authorized Facilities in Canada and the continental United States. Persons seeking further information regarding the application of specific GCP requirements may wish to review the auditor training co-developed by APHIS and CFIA.

The GCP recognizes that CFIA and APHIS each have their own plant health regulatory requirements and administrative processes. The following subsections describe specific administrative situations as they are dealt with in Canada.

### 5.1.1 Facility Authorization

#### 5.1.1.1 Single facility authorization

With respect to GCP Part IV, Section 1.0 Facility Authorization, a separate facility may include multiple distinct physical locations under restricted conditions. The locations must have the same GCP manager, must have the same administrative centre and all locations must be within the service area of a single CFIA inspection office.

#### 5.1.1.2 Off-site production

When facilities rent, lease or otherwise arrange for the use of an off-site production area that is not in the same physical location as the Authorized Facility and wish to include the off-site location in the GCP, the location and description of the off-site production area and the management of the off-site facility must be included in the Pest Management Plan. An off-site facility that is not included in the facility's Pest Management Plan is considered to be a not authorized facility for the purpose of GCP Part IV, Section 2.1.3.

#### 5.1.1.3 Shared premises

If an authorized facility is using a production area that is joined, shared, immediately adjacent to or otherwise not physically separated and separately managed from a production area used by another GCP Authorized Facility, if one of the Authorized Facilities is suspended from the GCP, then all Authorized Facilities using the shared premises are suspended until CFIA can complete an investigation and issues related to the suspension have been addressed.

### 5.1.2 Evidence of official phytosanitary inspection

GCP Part II, Section 4.1.1 and Part IV, Section 2.1.3 include requirements for facilities to obtain an official inspection and to keep records of the inspection.

The CFIA may provide the record of inspection either by

- providing a CFIA/ACIA xxx Evidence of Inspection, or;
- applying the CFIA official stamp to the invoice prepared by the supplying facility. It must be clear when the inspection was conducted and who conducted the inspection.

### 5.1.3 Authorized Facility – Plant Broker

To further clarify the GCP definition of Authorized Facility - Plant Broker, these facilities may buy, sell and/ or distribute plants but do not own or operate a facility for producing plants. Production of plants includes growing, holding in cold storage or otherwise maintaining plants. Facilities that hold plants longer than to assemble a consignment for any reason must be authorized as a place of production.

With respect to GCP Part IV, Section 2.3, Compliance Agreement Elements for Authorized Facility – Plant Broker, "transform" includes the inclusion of associated articles, addition of growing media and/or any other practice that affects the phytosanitary risk of the exported plant. Facilities that "transform" plants must be authorized as a Place of Production.

### 5.1.4 Enterable

With respect to the use of the term "enterable" in the GCP Technical Requirements, plants may be considered eligible for the GCP provided that they can meet the phytosanitary import requirements of both Canada and the United States. Plants from offshore, e.g. plants that do not have a place of origin of Canada or the continental United States, must have phytosanitary documentation indicating that entry requirements are met for both countries.

GCP facilities should ensure that phytosanitary certificates for offshore plants include the additional declarations required by both APHIS and CFIA.

#### 5.1.4.1 Plant taxa that are only eligible from a United States place of origin

U.S. regulation 7CFR319.37-1 lists certain plant taxa are prohibited articles from all countries, including Canada. These taxa may only be considered Eligible Plants if the plants have a United States place of origin and a Production Module has been accepted by CFIA. The module will detail the phytosanitary risk management measures to maintain production conditions at the Authorized Facility that are equivalent those present in the United States. The module will be jointly reviewed with APHIS prior to acceptance.

### 5.1.5 Eligible Vegetables

With respect to GCP Part II, Section 3.0, Eligible Plants, leafy fresh vegetables shipped with roots and associated growing media that require a phytosanitary certificate are eligible for the GCP.

### 5.1.6 CNCP Interfacility Stamp

For the purpose of GCP Part II, Section 4.1.1, Exceptions to the Growth and Monitoring Period, a document bearing a CNCP interfacility stamp is considered to be equivalent to a phytosanitary certificate issued by Canada or the United States.

### 5.1.7 Pest Modules

Certain regulated pests present in Canada and the continental United States are distributed in both countries, e.g. Popillia japonica (Japanese beetle), Lymantria dispar (gypsy moth) and others. In practice, conventional phytosanitary certification does not require specific phytosanitary measures for hosts of these pests when the hosts are moved between infested areas in Canada and the continental United States.

The Export Certification Label and Interfacility Stamp indicate that plants meet all requirements of the GCP and are ready for export. To respect the principle that GCP Certified Plants may be exported to the United States and returned to Canada under an Export Certification Label, Authorized Facilities that choose to not implement Pest Modules for all regulated pests in their area;

a. may not utilize an Interfacility Stamp
b. may not ship to an Authorized Facility in the United States or Canada using an Export Certification Label.

As a reminder, Authorized Facilities are responsible for ensuring that plants meet destination State phytosanitary requirements and any phytosanitary requirements for movement within Canada in addition to meeting the requirements of the GCP.

## 6.0 Specific Requirements

### 6.1 Prohibitions

Plants may not be shipped under a GCP export certification label or interfacility stamp unless the plants meet all requirements of the GCP.

### 6.2 Import Requirements

Plants may be imported from the continental United States under a GCP Export Certification Label in lieu of a USDA issued phytosanitary certificate.

An example USDA GCP Export Certification Label is found in Appendix 4.

### 6.3 Domestic Requirements

The Interfacility Stamp does not replace a CFIA Domestic Movement Certificate for the purpose of meeting the requirements of Plant Protection Regulations sections 51 and 52. All plants shipped within Canada must comply with any pest-specific or commodity-specific regulatory requirements.

The list of GCP Authorized Facilities in Canada is found in Appendix 2.

### 6.4 Export Requirements

Certified Plants meeting the conditions of the GCP at facilities authorized by CFIA in Canada may be exported to the United States using a GCP export certification label in lieu of a CFIA issued phytosanitary certificate.

### 6.5 Audit Requirements

APHIS and CFIA agree that the minimum qualification for GCP auditors is designation as an authorized certification official and successful completion of CFIA sanctioned audit training.

CFIA's integrated inspection model (iAIM) is the framework for organizing audit inspections. GCP audit inspections are organized within the iAIM preventive control plan structure. Please refer to Appendix 6 for details.

## 7.0 Administrative requirements

### 7.1 Authorization

Facilities who wish to participate in GCP must submit an application to their local CFIA office.

Facilities that successfully complete the authorization process and enter into a Compliance Agreement with the CFIA and are in good standing in the GCP are authorized to ship certified plants under an Export Certification Label in lieu of a phytosanitary certificate.

An overview of the Authorization process is found in Appendix 1.

### 7.2 Compliance Agreement

The GCP Compliance Agreement does not expire; however, there are circumstances when a new GCP Compliance Agreement is required. These situations include but are not limited to:

- There has been a change in facility ownership

- There has been a significant change in the nature of the Authorized Facility's business, e.g.
    - A Plant Broker starts growing plants
    - The Authorized Facility changes geographic location
    - There is a significant expansion or reduction of the physical location of the Authorized Facility
    - The Authorized Facility enters into or withdraws from the Equivalent Postentry Quarantine program (D-16-03)
- An Authorized Facility voluntarily withdraws from the GCP and wishes to re-enrol in the GCP
- An Authorized Facility has its authorization cancelled by the CFIA and the facility wishes to re-enrol in the GCP

### 7.3 Authorization Numbers, Export Certification Labels and Interfacility Stamps

An authorization number will be issued to facilities upon successful completion of the Authorization Audit.

Ordering procedures for export certification labels and interfacility stamps are found in Appendix 3.

Examples of Export Certification Labels and Interfacility Stamps are found in Appendix 4.

### 7.4 Forms

The forms used for the administration of the GCP are found in Appendix 5 in a "fillable PDF" format.

Facilities that do not have access to the Internet may request hard copies of the forms from their local CFIA office.

Facilities must work with their local CFIA office to establish the correct point of contact for receipt of GCP administrative forms.

Documents may be submitted to CFIA via email. Documents submitted from the facility's company email account are not required to bear the applicant's signature.

### 7.5 Records

To facilitate the ongoing review and maintenance of the GCP and regular communication between APHIS and CFIA, CFIA will maintain ongoing, cumulative summaries of GCP records maintained per GCP Part III, Section 6 for each Authorized Facility.

The ongoing summary will include the facility name, facility authorization number, audit date, facility status at the completion of the audit and a summary of each Major and Critical non-compliance and its resolution.

## 8.0 Non-compliance

The GCP is a voluntary export certification option and facilities not meeting the requirements of their compliance agreement are subject to the corrective action, suspension and cancellation provisions of the GCP.

Some non-compliance with the GCP compliance agreement may also be contraventions of the Plant Protection Act (PPA) and/or the Plant Protection Regulations (PPR). Some examples of GCP non-compliance that are also contraventions of the PPA and PPR include;

- Using an export certification label to ship plants or things which do not meet the requirements of the GCP
- Using an export certification label to certify plants infested with a regulated pest
- Failing to notify CFIA of the presence of a pest in an area where the pest has not previously been reported

## 9.0 References

### 9.1 Fees

The CFIA charges fees in accordance with the *Canadian Food Inspection Agency Fees Notice*. For information regarding fees, please contact your local CFIA office or visit the CFIA's *Fees Notice* website.

### 9.2 Supporting documents

D-16-03 (Draft): Postentry Quarantine to Meet United States Phytosanitary Import Requirements.

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-pests-invasive-species/directives/date/d-08-04/eng/1323752901318/1323753612811]. CFIA, Ottawa.

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-pests-invasive-species/directives/date/d-96-20/eng/1323854223506/1323854343186]. CFIA, Ottawa.

D-01-06: Canadian phytosanitary policy for the notification of non-compliance and emergency action. [http://inspection.gc.ca/plants/plant-protection/directives/date/d-01-06/eng/1320037517418/1320037718275]. CFIA, Ottawa.

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

USDA Plants for Planting Manual. [
http://www.aphis.usda.gov/import_export/plants/manuals/ports/downloads/plants_for_planting.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=aaaf2d38276db624f936d516691ebc2a&mc=true&node=sp7.5.319.xx9&rgn=div6 ], and
Part 360 Noxious Weed Regulations. [ http://www.ecfr.gov/cgi-bin/text-idx?SID=aaaf2d38276db624f936d516691ebc2a&mc=true&tpl=/ecfrbrowse/Title07/7cfr360_main_02.tpl]

ISPM 5. International Standards for Phytosanitary Measures. Glossary of Phytosanitary Terms (as amended by CPM-10). 2015, FAO. [ https://www.ippc.int/en/publications/622/ ]

ISPM 12. International Standards for Phytosanitary Measures. Phytosanitary certificates (as revised by CPM-9, 2014). 2016. FAO [https://www.ippc.int/en/publications/609/]

ISPM 14. The Use of Integrated Measures in a Systems Approach for Pest Risk Management. 2002, FAO. [ https://www.ippc.int/en/publications/607/ ]

ISPM 36. Integrated Measures for Plants For Planting. 2012, FAO.
[ https://www.ippc.int/en/publications/636/ ]

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. [appendix to RSPM 24 http://www.nappo.org/english/standards-and-protocols/regional-phytosanitary-standards-rspms/rspm-24/]

RSPM 5. NAPPO Glossary of Phytosanitary Terms. NAPPO, 2012. [ http://www.nappo.org/english/standards-and-protocols/regional-phytosanitary-standards-rspms/rspm-05/]

RSPM 24. Integrated Pest Risk Management Measures for the Importation of Plants for Planting into NAPPO Member Countries. 2005, NAPPO. [http://www.nappo.org/english/standards-and-protocols/regional-phytosanitary-standards-rspms/rspm-24/]

# 10.0 Annexes

## Annex 1: Transition to the GCP

### 1.0 General

The GCP is being implemented over a period of time to facilitate an orderly transition from the current D-96-12: Greenhouse Certification Program for Export of Greenhouse-grown plants to the United States (CGCP) to the new GCP. At the end of the transition period, directive D-96-12 will be cancelled, any remaining CGCP facilities will have their approval cancelled and their CGCP Export Certification Labels and Interfacility Stamps will be collected. CGCP facilities that have not completed transition to the GCP will no longer be able to ship plants to the United States using an Export Certification Label.

The transition period will end December 31, 2019.

### 1.1 CGCP facilities

Current CGCP facilities transitioning to the GCP will continue to use their existing CGCP Export Certification Labels and Interfacility Stamps.

Note: When ordering Export Certification Labels and Interfacility Stamps during the transition period, please keep in mind that APHIS and CFIA intend to review the specifications for the export certification label and interfacility stamp and expect that a new design will be implemented at the end of the transition period. To minimize the occurrence of label and stamp redesign events, the legacy system of assigning facility authorization numbers will be reviewed at the same time to make sure it is in line with CFIA administrative practices.

CGCP facilities that are transitioning to the GCP must continue to meet the conditions of the CGCP until they have completed the transition process and enter into a GCP compliance agreement. For example, until the CGCP facility has completed transition to the GCP, plant taxa that are excluded from the CGCP may not be shipped under a CGCP Export Certification Label. Shipping plant taxa currently excluded from the CGCP under a CGCP Export Certification Label is a critical non-conformance resulting in suspension from the CGCP and is a contravention of Section 57 of the Plant Protection Regulations.

CGCP approved facilities may ship plants that meet the requirements of D-96-12 under an interfacility stamp to GCP Authorized Facilities in Canada. Shipping plant taxa currently excluded from the CGCP under a CGCP interfacility stamp is a critical non-conformance that leads to suspension from the CGCP.

GCP Authorized Facilities in Canada may ship Certified Plants under an interfacility stamp to CGCP approved facilities. CGCP approved facilities may not ship plants excluded under D-96-12 under a CGCP Export Certification Label even if they are received from a GCP Authorized Facility.

Facilities that have not incurred a Critical or Major non-conformance in their past four scheduled CGCP audits and are at CGCP Standard status (one inspection every three months the facility is in production), will have an initial audit frequency of GCP Standard Status (one systems audit and one surveillance audit annually, conducted on separate occasions). All other CGCP facilities will have an initial audit frequency of 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.

### 1.2 New Facilities

CFIA no longer accepts applications to participate in the CGCP. Prospective facilities may apply to participate in the GCP.

## 2.0 Transition Management

Due dates have been established to help CFIA prioritize their transition activities and to facilitate transition. Facilities which are not able to meet the due dates may experience delays in their authorization process. CFIA may prioritize individual applications to efficiently facilitate the transition process.

| Due Date | Authorization Activity |
|---|---|
| February 1, 2018 | Application for Authorization under the GCP submitted to the local |

| | |
|---|---|
| | CFIA office |
| June 1, 2018 | Submission of List of Plants for Production |
| December 1, 2018 | Submission of Pest Management Plan, including pest and production modules and application for exemption |
| December 31, 2019 | Termination of the CGCP |

Early completion of GCP authorization activities is encouraged. Facilities that are unable to submit their application, list of plants in production or pest management plan by the critical dates may not be able to complete the authorization process prior to the end of the CGCP.

To expedite CFIA-facility interactions during the transition period, applicants may wish to submit their list of plants in production at the same time as their application.

The CFIA may return applications for authorization when there is missing information or clarification required. The date the corrected application is received will determine where the facility sits in the authorization queue.

Applications for exemption (minimum 28 day growth and monitoring period and/or outdoor production) or certification of associated articles are reviewed by a joint CFIA-APHIS GCP administration group. These applications should be submitted early in the authorization process as the details of any exemption are required to complete the pest management plan.

### 3.0 Authorization Audit

Once CFIA has accepted the Pest Management Plan, the Authorization Audit will take place at the time of the next scheduled CGCP audit inspection unless otherwise determined by CFIA. The Authorization Audit will be in lieu of the scheduled CGCP audit inspection.

The purpose of the Authorization Audit is to demonstrate that all components of the compliance agreement have been implemented at the facility, however until the CGCP facility enters into a GCP compliance agreement, they may not conduct activities or ship plants which are permitted by the GCP but not the CGCP. If activities not permitted under the CGCP are detected during the Authorization Audit, the Authorization Audit will be stopped, the CGCP non-compliance addressed and the Authorization Audit rescheduled for the time of the next scheduled CGCP audit inspection.

## 11.0 Appendices

### Appendix 1: GCP Authorization Process and Checklists

The Canadian Greenhouse Certification Program (CGCP) is being phased out and being replaced by the United States – Canada Greenhouse-Grown Plant Certification Program (GCP) over the next two years. After December 31, 2019, the CGCP will no longer be an option for exporters to ship plants to the United States using a CGCP export certification label in lieu of a phytosanitary certificate.

Producers and exporters who wish to continue using an Export Certification Label in lieu of a phytosanitary certificate for shipments of greenhouse-grown plants to the United States will need to apply for authorization under the new GCP.

Although a two year transition period may seem like a long time, it is not. While the CGCP and the GCP are similar, there are a number of steps leading to Authorization for both the applicant and CFIA. Facilities are encouraged to apply early to assist CFIA in managing the volume of authorization activities to be completed before the end of the transition period.

The following checklists will help you keep track of your Authorization process. The GCP is designed for the wide range of business and production practices found in the greenhouse plant supply chain, ranging from importers and propagators to shippers and brokers. Focus on the sections that apply to your facility. Facilities with more complex production and pest management practices may have more options to consider. Your local CFIA staff are available to assist you throughout the process.

## Authorization Checklist for Places of Production

### Application
The application for Authorization is found in D-16-02, Appendix 5.

### List of Plants in Production
All Place of Production facilities must prepare and submit the List of Plants in Production. The list needs to meet the requirements of GCP Part IV, Section 2.2.2. The CFIA needs to review the list to verify accuracy and to be able to tell the facility which Pest Modules will be required in the Pest Management Plan. The list may be submitted as a hard copy or as an electronic file. Work with your local CFIA office to make sure electronic documents submitted are in a format that can be easily read by CFIA.

### Pest Modules
Once CFIA has reviewed the List of Plants in Production, they will provide you with a list of regulated pests present in the area and indicate which ones require a Pest Module in the Pest Management Plan. Record this information on the bottom of the first page of the Pest Management Plan.

**Pest Management Plan**
The Pest Management Plan template is in D-16-02, Appendix 5. The template is available as a "fillable PDF" and is the standardized format to be used by all GCP authorized facilities.

Please note that completion of the Pest Management Plan will require some back and forth with CFIA and depending on your need for Production Modules, may involve a number of interactions before the Pest Management Plan can be completed and submitted to CFIA.

**Production Modules**
The Production Modules you will require depends on your activities and production practices that are outside the "core" GCP. The following four fields describe when Production Modules are required. These should be addressed early in the application process so you can complete and submit your Pest Management Plan. If your facility doesn't require Production Modules, pass through this section and complete your Pest Management Plan.

1. **Exemption for Growth and Monitoring Period less than 28 days**

The application is in D-16-02, Appendix 5. This module is only required for plants that are not excepted by GCP Part II, Section 4.1.1. Although the application is submitted to CFIA, the exemption decision is made by a joint APHIS-CFIA administrative group which will meet periodically during the year.

2. **Exemption for Outdoor Growth**

The application is in D-16-02, Appendix 5. This module is required when plants are grown outside the greenhouse structure. Although the application is submitted to CFIA, the exemption decision is made by a joint APHIS-CFIA administrative group which will meet periodically during the year.

3. **Exemption for shipment of Associated Articles**

The application is in D-16-02, Appendix 5. CFIA will work with you to determine any specific phytosanitary import requirements for the Associated Article(s) to inform the development of the Production Module.

4. **Addressing specific production conditions**

There may be circumstances or production practices at your facility when a Production Module is appropriate to detail specific risk mitigation measures, e.g. if you are producing Eligible and Ineligible plants of the same taxa. If you anticipate that a Production Module to address specific conditions may be required, e.g. measures to prevent the mixing of Eligible and Ineligible plants, feel free to be proactive and contact CFIA for a preliminary review.

**Authorization Audit**

Once CFIA has received and accepted your facility's Application for Authorization, List of Plants in Production and Pest Management Plan, an Authorization Audit will be scheduled to verify that all elements of the Compliance Agreement have been implemented at the facility. If there are any shortcomings identified during the audit, they must be addressed before your facility may enter into a GCP compliance agreement with CFIA.

**Compliance Agreement**
The Compliance Agreement template is found in D-16-02, Appendix 5. The Compliance Agreement is prepared by the CFIA using the information provided in your application. The Compliance Agreement will be signed by the responsible person at your facility. Once the Compliance Agreement is signed, your facility is operating under the conditions of the GCP Technical Requirements and D-16-02.

**Authorization Checklist for Plant Brokers**

**Application**
The application for Authorization is found in D-16-02, Appendix 5.

**Authorization Audit**
Once CFIA has received and accepted your facility's application, an Authorization Audit will be scheduled to verify that all components of the Compliance Agreement have been implemented at the facility. If there are any shortcomings identified during the audit, they must be addressed before your facility may enter into GCP compliance agreement with CFIA.

**Compliance Agreement**
The Compliance Agreement template is found in D-16-02, Appendix 5. The Compliance Agreement is prepared by the CFIA using the information provided in your application. The Compliance Agreement will be signed by the responsible person at your facility. Once the Compliance Agreement is signed, your facility is operating under the conditions of the GCP Technical Requirements and D-16-02.

**Congratulations and Welcome to the GCP**

**Appendix 2: GCP Authorized Facilities in Canada**

GCP Authorized Facilities in Canada
(*note: The above title will be a hyperlink to the list of GCP Authorized Facilities in Canada. The timing of publishing the list is yet to be determined*)

As per GCP Part III, Section 6.1, the list of GCP Authorized Facilities in Canada includes;

- facility name;
- contact information;
- address;
- physical address/location of Authorized Facility; and
- Authorization Number.

**Appendix 3: Ordering procedures for export certification labels and interfacility stamps**

The facility completes Part I of the Export Certification Label and Interfacility Stamp order form found in Appendix 5 and submits it to the local CFIA office.

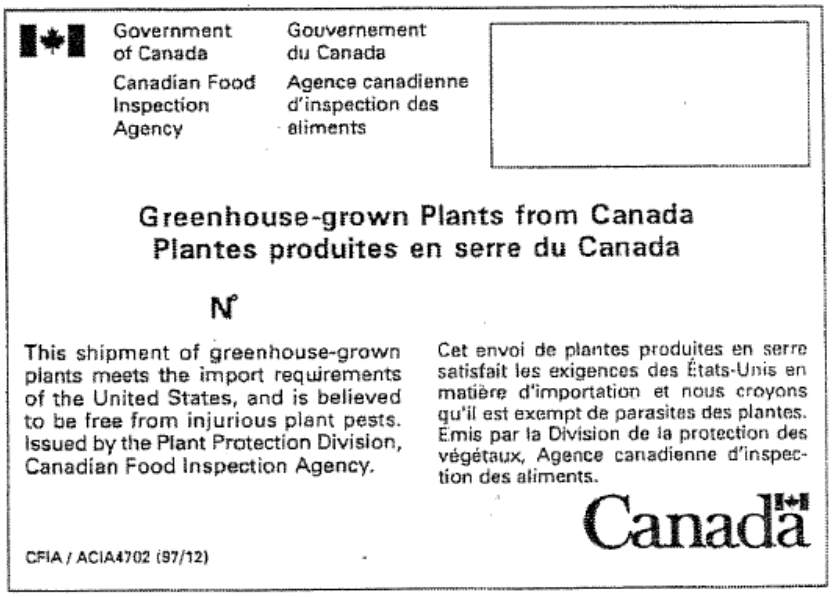
The CFIA office will verify that the facility is authorized, complete the form and send it to the supplier. The supplier bills the facility and sends the labels or stamps directly to the facility. The facility may enquire with their local CFIA office regarding minimum orders and costs for export certification labels.

At this time, the only supplier of export certification labels is Label Design Limited, Guelph Ontario. The supplier requires a minimum of 50 labels and will invoice the facility directly.

Facilities may indicate a preferred supplier for interfacility stamps. If no preferred supplier is indicated, CFIA will send orders to Sterling Marking Products Inc. who will deal with the facility directly. When a different supplier is specified, the facility is responsible for communicating the specifications for the interfacility stamp. Non-conforming stamps are not acceptable. See Appendix 4 for an example of the interfacility stamp.

**Appendix 4: Examples of Export Certification Labels and Interfacility Stamps**

**Export Certification Label – Canada**


Government of Canada / Gouvernement du Canada
Canadian Food Inspection Agency / Agence canadienne d'inspection des aliments

Greenhouse-grown Plants from Canada
Plantes produites en serre du Canada

N°

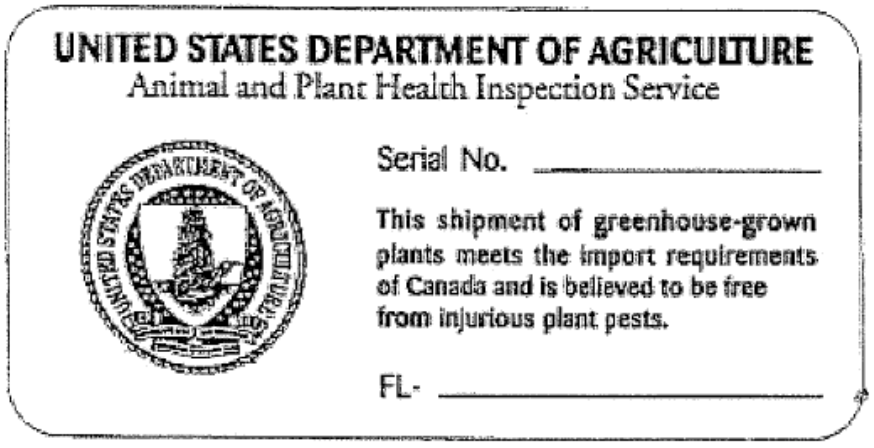
This shipment of greenhouse-grown plants meets the import requirements of the United States, and is believed to be free from injurious plant pests. Issued by the Plant Protection Division, Canadian Food Inspection Agency.

Cet envoi de plantes produites en serre satisfait les exigences des États-Unis en matière d'importation et nous croyons qu'il est exempt de parasites des plantes. Émis par la Division de la protection des végétaux, Agence canadienne d'inspection des aliments.

Canada

CFIA / ACIA4702 (97/12)

**Export Certification Label – United States**


UNITED STATES DEPARTMENT OF AGRICULTURE
Animal and Plant Health Inspection Service

Serial No. _____

This shipment of greenhouse-grown plants meets the import requirements of Canada and is believed to be free from injurious plant pests.

FL- _____

**Interfacility Stamp – Canada**


► Description for Examples of Export Certification Labels and Interfacility Stamps

The Export Certification Label - Canada is a rectangular sticker applied by the authorized facility.

All the information on the Export Certification Label is present in both official languages. A small Canadian flag with the following heading is printed on the top left of the sticker:

"Government of Canada
Canadian Food Inspection Agency"

The top right of the label is a space for a sequential serial number and the facility authorization number is printed in the middle of the sticker.

The title "Greenhouse-grown Plants from Canada" is written in bold in the middle of the label and above the authorization number.

The following statement appears under the authorization number:
"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 the Plant Protection Division, Canadian Food Inspection Agency".

The Export Certification Label – United States is a rectangular sticker with rounded corners

applied by the authorized facility.

All the information on the Export Certification Label is in English. The following heading is printed across the top of the sticker:

"United States Department of Agriculture
Animal and Plant Health Inspection Service"

The seal of the United States Department of Agriculture appears on the left side of the sticker.

The top right of the label is a space for a sequential serial number and the facility authorization number is printed on the bottom left.

The following statement appears between the serial number and the authorization number:
"This shipment of greenhouse grown plants meets the import requirements of Canada and is believed to be free from injurious plant pests.

The Interfacility stamp - Canada is a rectangle stamp.

All the information on the stamp is present in both official languages.

A small Canadian flag with the following heading is printed on the top of the stamp:

"Government of Canada
Canadian Food Inspection Agency"

The following text appears in the middle of the stamp:

"Greenhouse Certification Program
Interfacility stamp"

The facility authorization number appears on the bottom line of the stamp.

**Appendix 5: Forms**

In the event the links in this appendix do not go directly to the required form, the user may search for the correct form using the CFIA Forms Catalogue.

1. **Facility Forms**

The forms in this section are downloaded and completed by the facility and communicated to CFIA.

**Application for Authorization under the GCP**
CFIA/ACIA xxx

This form is used by facilities to apply to participate in the GCP. Instructions for completion are included on the form.

**Request for Exemption from the minimum Growth and Monitoring Period**
CFIA/ACIA xxx

This form used by facilities to apply for an exemption under GCP Part II, Section 4.2.1. Instructions for completion are included on the form. The form is sent to CFIA. The decision whether to grant an exemption is made by the GCP joint administration group and communicated to CFIA.

**Request for Exemption for Outdoor Production**
CFIA/ACIA xxx

This form used by facilities to apply for an exemption under GCP Part II, Section 4.2.1. Instructions for completion are included on the form. The form is sent to CFIA. The decision whether to grant an exemption is made by the GCP joint administration group and communicated to CFIA.

**Application to Certify Associated Articles**
CFIA/ACIA xxx

This form is used by the facility to indicate that they wish to include Associated Articles in the GCP. CFIA will inform the facility of the phytosanitary requirements for the Associated Article that must be taken into consideration and incorporated into the production module.

**Pest Management Plan Template**
CFIA/ACIA xxxx

This template is used by all GCP Place of Production facilities to record their Pest Management Plan. The template contains the same information as GCP Part V, Appendix 1 but it has been formatted to reflect the sequence of the CFIA Integrated Agency Inspection Model (iAIM)

**Export Certification Label and Interfacility Stamp order form**

CFIA/ACIA xxxx

This form is used by the facility to order Export Certification Labels and/or Interfacility Stamps.

## 2. CFIA Forms

The following forms are for the use of CFIA inspectors and would not normally be accessed or completed by the facility. CFIA inspectors may request that the facility download and complete individual forms as required.

**Evidence of official inspection**
CFIA/ACIA xxx

This form is used by CFIA to provide evidence of official inspection for the purposes of GCP Part II, Section 4.1.1 and Part IV, Section 2.1.3

**Compliance Agreement**
CFIA/ACIA xxxx

The compliance agreement is prepared by CFIA and once signed by the facility representative and the CFIA, authorizes the facility to ship Certified Plants under an Export Certification Label in lieu of a phytosanitary certificate under the conditions of the GCP.

**Corrective Action Request**
CFIA/ACIA xxxx

The Corrective Action Request is used to record non-compliance and corrective action per GCP Part III, Section 10.

## Appendix 6: GCP audit inspections under the iAIM framework

The GCP is audited using the CFIA integrated inspection model (iAIM) as the framework for conducting GCP audit inspections. Details of the iAIM approach may be found at http://inspection.gc.ca/about-the-cfia/accountability/inspection-modernization/integrated-agency-inspection-model/eng/1439998189223/1439998242489.

The integrated Agency inspection model (iAIM) framework includes a structure for the evaluation of preventive control plans. For clarity, although the GCP is not technically an iAIM preventive control plan (PCP), the iAIM structure is used to conduct the evaluation of the GCP compliance agreement. The following tables illustrate the grouping of the elements of the GCP compliance agreement into the iAIM audit structure.

**iAIM PCP Sub-element 1.1 Process Controls**

| GCP Part IV Section number and heading | Summary of GCP requirements being assessed |
|---|---|
| 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. |
| 2.2.2 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, source, description of plants, 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, a notation whether the plants are eligible and 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. |
| 2.2.3 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. |
| 2.1.2.1 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. |
| 2.2.1 Minimum Requirements for Greenhouse | Plants must be monitored, managed and greenhouse-grown at the Authorized Facility. All production, receiving, handling, storing and shipping areas of the Authorized Facility must be monitored and maintained in good condition. |

| Structures | |
|---|---|
| 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. |
| 2.2.1.4 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 |

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| | 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. |
| 2.2.5.1 Incoming Plants | Plants brought into the Authorized Facility must be inspected for pests by designated personnel prior to moving the plants into production areas. |
| 2.2.7.1 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 taxa. The measures described in the module may be proposed by the Authorized Facility and accepted by the NPPPO or may be determined by the NPPO |

**iAIM PCP Sub-element 1.2 Product Controls**

| **GCP Part IV Section number and heading** | **Summary of GCP requirements being assessed** |
|---|---|
| 2.1.2 Inventory Control | 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. |
| 2.2.5.3 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. |

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| 2.2.3<br>Eligible Plants | Records 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. |
| 2.3.2<br>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. |

**iAIM PCP Sub-element 1.4 Export Controls**

| **GCP Part IV Section number and heading** | **Summary of GCP requirements being assessed** |
|---|---|
| 2.1.3<br>GCP Certification Documents | Export Certification Labels and Interfacility Stamps are used to document and maintain the status of GCP Certified Plants. The Authorized Facility must inform the NPPO in the event that any Export Certification Labels or Interfacility Stamps are stolen or lost. 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 taxa contained within these items. For example, the documentation could |

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| | 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<br>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<br>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. |
| 2.1.4<br>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 3 years. This does not supersede other regulatory requirements, e.g. CITES. |
| 2.2.6<br>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 their GCP application package. The procedures |

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| | 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. |

**iAIM PCP Sub-element 2.2 Pest Control**

| **GCP Part IV Section number and heading** | **Summary of GCP requirements being assessed** |
|---|---|
| 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. |
| 2.3.2 Examination of Shipping Areas and Certified | 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. |
| 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 2 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.). |
| 2.1.5 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. |

**iAIM PCP Sub-element 3.2 Employee Training**

| GCP Part IV Section number and heading | Summary of GCP requirements being assessed |
|---|---|
| 2.1.1<br>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. |
| 2.1.5<br>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. |
| 2.2.4<br>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. |
| 2.1.6<br>CFIA 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. |

**iAIM PCP Sub-element 5.1 Premises and Surroundings**

| GCP Part IV Section number and heading | Summary of GCP requirements being assessed |
|---|---|
| 2.2.1<br>Minimum Requirements for Greenhouse | 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. |

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| Structures and Production Practices | 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. |
| 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. |
| 2.2.1.3 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. |