



CLEAN PLANTS

Domestic Phytosanitary Certification Program

AUDITOR TRAINING MANUAL

Prepared for:

Canadian Nursery Certification Institute

Revised and Updated for Clean Plants: June 2013

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Introduction

The purpose of this manual is to familiarize the auditor with the conditions, regulations and other relevant information that influenced the development and implementation of the Clean Plants domestic phytosanitary nursery certification program.

The Clean Plants program is a work in progress; changes will be made to the program to accommodate new regulations and industry concerns, to continue to minimize risk of moving Invasive Alien Species, whether they are pests or diseases, through nursery stock.

This program was originally written in partnership with the Canadian Food Inspection Agency (CFIA) in 2008 as a feeder program to export nurseries participating in the Canadian Nursery Certification Program, (CNCP) the only nursery export program under the authority of the CFIA.

Since that time, with the lessening of trade to the US, growers have requested a move away from the export requirements, to a less export-focused program with equivalent integrity to protect nurseries and plants from incoming pests and diseases – quarantine and domestic.

The program was revised in December 2011 to minimize duplication and provide more clarity for growers following the program. The revised 'Clean Plants' program is currently on the Clean Plants website. Older versions are available for review by auditors by contacting:

Crislane Ackermann,

Program Administrator

Canadian Nursery Landscape Association

Association Canadienne des Pépiniéristes et des Paysagistes

7856 Fifth Line South | Milton, ON L9T 2X8

Tel: 905.875.1399 ext 8615 | Toll Free: 1.888.446.3499 ext 8645

Fax: 905.875.1840 | Toll Free Fax: 1.866.833.8603

Email: info@canadanursery.com | Web: www.canadanursery.com

Ms. Ackermann is the Administrator for the Clean Plants program and will be your key contact person in 2013.

The Clean Plants Nursery Certification Program

By 2007, the North American Plant Protection Organization (NAPPO) had recognized that there was a significant threat of Invasive Alien Pests coming onto its shores through nursery stock. The three countries, Canada, USA and Mexico all agreed to the basic tenets of a domestic certification program, to further minimize the movement of pests across state and provincial boundaries as well as international borders.

The two NAPPO documents that provided the basis for the Clean Plants program were:

- ISPM 14 The use of integrated measures in a systems approach for pest risk management (IPPC).
- RSPM 24 Integrated Pest Risk Measures for the importation of plants for planting into NAPPO member countries (NAPPO).

The three countries voluntarily agreed to a timeline to implement the programs in their countries: Mexico by 2008, Canada by 2010 and the US by 2012. The industry in the US has decided to study the efficacy of the systems approach to minimize the risk of moving pest through nursery stock; as of May 2013, the American nursery industry is continuing to stall on moving ahead with nursery certification, which has spurred USDA to restrict the movement of many plants from abroad. There has been no development of a national certification program in Mexico to date.

In the meanwhile, in Canada, the Canadian Nursery Certification Institute (CNCI) developed the Clean Plants program, and workshops took place to assist growers to move into the new program,

In BC, nursery growers were given three years to transition from the *P. ramorum* program to the Clean Plants program; 2011 was the last year a BC nursery could participate in the 'stand-alone' *P. ramorum* program. After this year, all nurseries wishing to be *P. ramorum* certified must do so through the Clean Plants program; the *P. ramorum* program is now a module of Clean Plants.

Nursery growers in good standing with the *P. ramorum* program were allowed to 'grandfather' into the Clean Plants program with certain caveats; they had to have their Nursery Manual in to CNCI by a certain date, and they had to be audited by a third party, and they had to maintain their certification practices for *P. ramorum*.

In 2012, a new pest was reported in the USA and Canada, named *Cylindrocladium buxicola* (*C. buxicola*) also commonly known as Boxwood Blight or Box Blight, as its predominant host is *Buxus*, of the Buxaceae family. Both the USA and CFIA, at the

moment of this writing, are not inclined to designate this fungus as a quarantine pest, which means that there are no punitive requirements where this pest is found. However, because of the economic importance to the ornamental landscape industry and its virulent infection rate, nursery growers have voluntarily chosen to destroy plants where they are found. CNCI has developed pest specific standards for *C. buxicola*, including an 'add-on' module for facilities already on Clean Plants, and a Phase 1 standard for facilities wanting to join Clean Plants through a phased-in approach.

Accreditation of this certification is provided by the Canadian Nursery Certification Institute and third party auditing is provided by Centre for Systems Integration (CSI). Administration of the program is by CNLA.

It is the auditor's job to ensure that all mandatory sections of the Clean Plants Domestic Phytosanitary Certification Standard are being complied with by the certified nurseries.

The current Clean Plants Nursery Certification Standard and Appendices, including the *P. ramorum* module, are located on the web at www.cleanplants.ca. These documents form an integral part of this auditor training package.

The P. ramorum Nursery Certification program

In 2003, *P. ramorum* nursery certification was developed when a relatively new pathogen, *Phytophthora ramorum*, was found in a nursery in Richmond, BC. *P. ramorum* is a quarantine pest, with prescribed actions and significant destruction carried out by CFIA at the facility where the infection is found.¹ This was followed in March 2005 by shipments of camellias infected with *P. ramorum* across North America originating from one facility in California.

The BCLNA organized a campaign to remove and destroy all camellias purchased by homeowners in BC since 2004, a huge undertaking with over 30 BCLNA staff, with cooperation from the BC Ministry of Agriculture & Lands Laboratory to provide testing and the participation of CFIA inspectors to provide oversight to the collection and prescribed destruction of the collected camellias. Over 1300 camellias were collected with 15 camellias found to be infected. In garden centres, thousands of additional camellias and other host plants were destroyed by CFIA in an effort to stop the spread of this disease.

¹ Refer to www.cleanplants.ca for reference and resources

While this was occurring, BC nursery growers agreed to develop a nursery certification program, based on the systems approach, to minimize the risk of moving *P. ramorum* through the nursery distribution system.

By the fall of 2005, a program was developed and implemented. In the ensuing years, 260 production facilities, including floriculture growers, forest seedling nurseries and wholesale nurseries in BC participated in the program.

By 2013, it is quite evident the implementation of this program in 2005 has minimized the movement of *P. ramorum*; in other parts of the US, this disease continues to spread with Washington State now reporting the largest numbers of incidents since 2006; *P. ramorum* continues to spread across the US into the eastern seaboard and has been found in several waterways.

The C. buxicola Nursery Certification program

Boxwood Blight was confirmed in North America for the first time in late 2011. This fungal blight, *Cylindrocladium buxicola*, causes spotting and lesions on plants in the Buxaceae family, rapidly leading to severe defoliation. Boxwood, a high value crop in the landscape/nursery business, has been relatively pest-free, and is grown in large numbers by nurseries across Canada (mainly BC and ON) so the disease posed a significant threat. Through 2012, the CNCI undertook to develop best management practices, a pest-specific module to add on to the Clean Plants program, and a phase-in certification program for nurseries new to Clean Plants.

In 2012, the disease was confirmed in Canada at 6 sites in BC, 2 in ON, and 1 in PQ through a CFIA survey. Only 3 nurseries self-declared the positive finds, and underwent severe eradication measures. Traceback to the original source has been difficult as the pest is not regulated by CFIA, and growers are not obligated to report finds and crop history. However, it is generally accepted that the disease was brought over from Europe to North America on bareroot liners intended for nursery production. The disease will not be regulated in either US or Canada, so the onus is on individual nurseries to minimize the spread of this disease.

By early 2013, nurseries growing or trading in boxwood began updating their manuals to include the *C. buxicola* component. Workshops in BC and ON have focused on improved phytosanitary practices and scouting programs for all nurseries, in an effort to slow the spread of the disease. There have been no public reportings of boxwood blight since the CFIA survey in the spring of 2012.

Industry Background

Container Production

Nursery stock has been traditionally grown in the field and then dug, potted or dug bare root. Container production of nursery crops in Canada has grown steadily since first introduced in the early 1950's. In British Columbia container production generates greater revenue than traditional field production. In recent years container growing of nursery stock has become a common practice in Ontario however, field grown nursery stock still comprises about 70% the stock currently grown. Container production is about 30%.

Container production takes place under relatively inexpensive poly houses or on open beds (Figure 1 to 3). In coastal British Columbia the majority of container production is in outside beds as heavy killing frosts are not a concern to hardy plants. In the interior of BC and Southern Ontario, much of the container crop is grown under poly hoop houses that offer protection from winter frosts. In the interior of BC, Ontario, and the Prairie Provinces, hardy shrubs and trees are grown outside but over-wintered by laying down and covering with a deep layer of straw or thermal blankets for insulation (Figure 4 & Figure 5).

Figure 1
Inexpensive polyhouses are used



Figure 2
Open beds with smaller pot sizes



Figure 3
Trees grown in larger pot sizes



Figure 4
Straw used for winter protection



Figure 5
Straw removed in spring



Small plants (liners) are planted into plastic pots (Figure 6) before being grown on to root in and enlarge in size before selling. In Canada, most nurseries use rigid plastic pots that come in variety of sizes. The most typical sizes are listed in Table 1.

Figure 6
Typical potting system



Table 1
Typical pot sizes used in Canadian Nurseries

Pot Designation	Height (cm)	Inside Top Diameter (cm)	Inside Bottom Diameter (cm)
#1 pot	15 – 18	15 – 19	12 – 13
#2 pot	19 – 23	19 – 23	16 – 20
#3 pot	22 – 26	22 – 26	21 – 23
#5 pot	28 – 32	24 – 31	22 – 26
#7 pot	28 – 32	31 – 36	28 – 31
#10 pot	37 - 39	38 - 40	38 – 40

In the nursery trade, the pot designation does not correspond to the actual volume of the pot. Efforts have been made by the Canadian Nursery Landscape Association (CNLA) to develop a set of standards that ensure that the pot designation and volume are understood by the trade. These standards are published in the Canadian Standards for Nursery Stock, available from the Canadian Nursery Landscape Association.

Types of plants typically sold in containers by Canadian nurseries include;

- Perennials (including ornamental grasses), deciduous shrubs, broadleaf evergreen shrubs, narrow-leafed evergreens, caliper trees, roses, and vines.

Advantages and Disadvantages of Container Growing

Advantages of Container Growing

There are a number of advantages for the facility producing plants in containers, including:

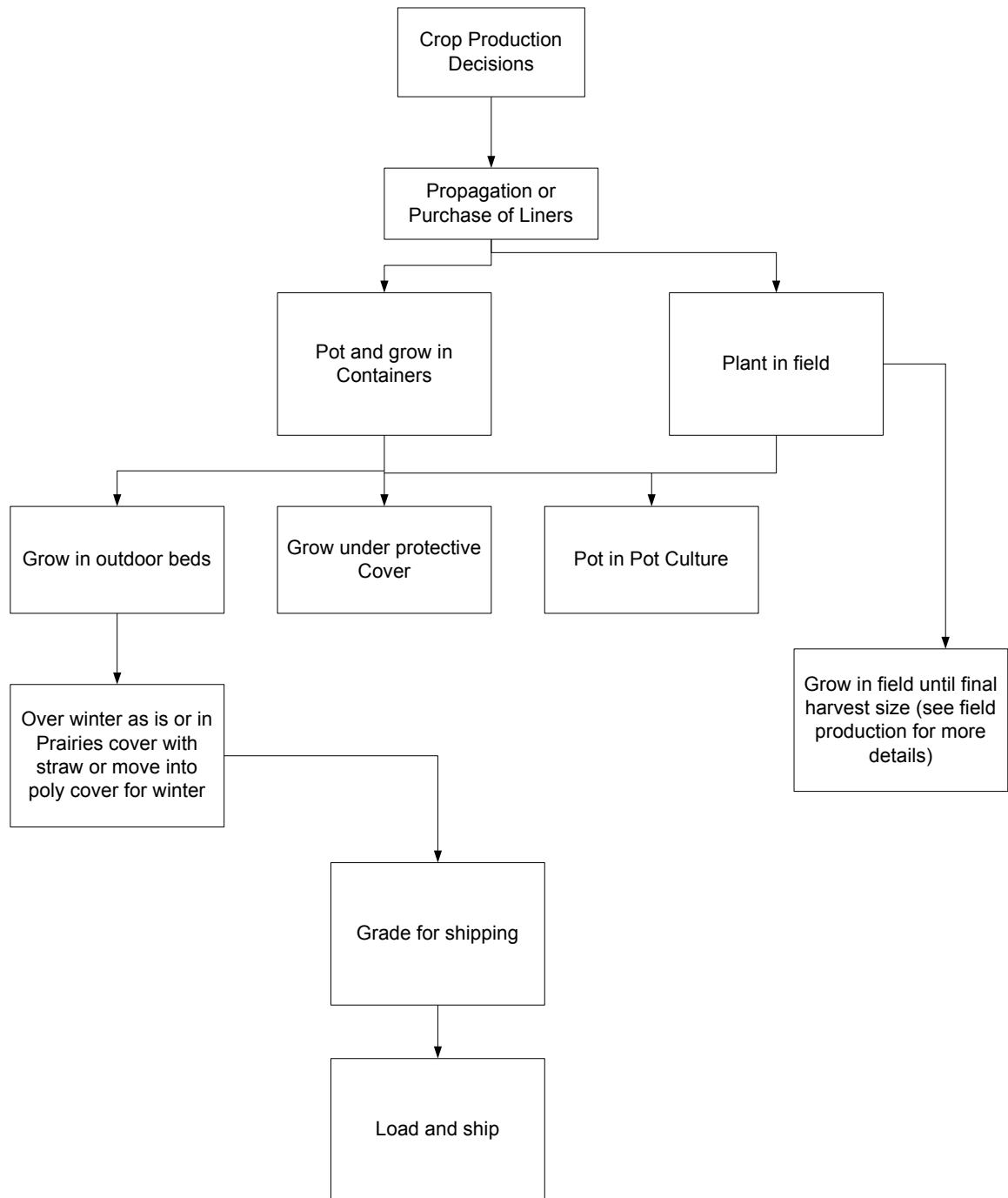
- higher densities of plants per hectare, thus greater return per hectare
- easier control of growing factors as compared to field production, these include:
 - a. fertility
 - b. pH
 - c. irrigation
 - d. growing medium characteristics such as porosity and aeration
- ability to sell and ship the plants for a much longer season than traditional field production allows (including summer)
- container plants are easier for garden centres to handle and have higher consumer appeal
- container nurseries do not need good agricultural soil, as long as there is good drainage
- decreased transplant shock

Disadvantages of Container Growing

Container production requires much more intensive management than field production, this management includes:

- frequent watering
- use of controlled release fertilizers
- monitoring of fertilizer levels as fertilizer may leach from the media under heavy watering
- selling or shifting to larger pots before plants become root bound
- limited root volume

Figure 7. Flow chart of Container Nursery Production



Nursery Plant Propagation

Prior to planting into larger containers, plants must first be propagated from parent stock. Liners for container production (Figure 7) can be prepared by a number of methods including: seed, cuttings, tissue culture and grafting. Basic information on each of these is given below.

Seed

If the nursery is not concerned about all plants having exactly the same characteristics of the parent, seed propagation can be used. Seed propagation is used for a large number of native plants where origin and hardiness are critical factors. Most seed needs various periods of stratification (warm or cold treatments) to break dormancy. This stratification process can either be done by sowing seed into flats and leaving the flats outside until germination takes place, by stratifying in refrigerators and then seeding directly into pots or by seeding into the field and transplanting after 1 or 2 years of field growth (Figures 8 to 11). The phytosanitary risk from seed propagation is very low.

Figure 8

Seedling germination – outside bed



Figure 9

Seedling germination – in trays



Figure 10
Seedling germination - plugs



Figure 11 Seedling - polyhouse



Vegetative Propagation

The two main methods of vegetative propagation are from softwood or hardwood cuttings. Some nurseries also have tissue culture labs or purchase tissue culture propagules from other nurseries. Asexual or vegetative production is used as a method of producing clones that are identical to the original parent stock plant.

Softwood

Softwood cuttings are taken in the late spring and summer when the wood is relatively soft. The cuttings are cut, treated with a rooting hormone and then stuck into a well drained soil-less media and kept in poly or glass houses under mist until roots are well formed. Cuttings can be direct stuck into small containers for easy transplanting or into flats where they are potted up at the appropriate time. The most common plants to be propagated from softwood cuttings are deciduous shrubs and some trees.

Hardwood

Hardwood cuttings (Figure 12) are taken in the winter usually after a spell of cold weather to ensure that the wood has hardened off. The cuttings are cut, treated with a rooting hormone and then stuck into a well drained soil-less media and kept in poly or glass with bottom heat. Cutting can be direct stuck into small containers for easy transplanting or into flats where they are potted up at the appropriate time. Evergreens are normally propagated from hardwood cuttings as well as many deciduous shrubs.

Tissue Culture

Tissue culture has become a popular method of propagation as it allows fast “bulking up” of plants and can often be used with otherwise hard to propagate plants. Tissue culture requires sterile laboratory procedures and highly trained staff. The phytosanitary risk from tissue culture propagated plants is extremely low.

Grafting and Budding

Grafting and budding is the process of asexual propagation where either buds or scion wood of the parent plants is cut off and attached to understock of another more vigorous variety or species (Figure 13). For example many ornamental conifers are grafted onto *Picea abies* (Norway Spruce) because of its vigor.

Figure 12 - Hardwood cuttings



Figure 13 – Grafting/Budding



Field Production

Traditionally nursery stock was all grown in the field and then dug with root balls, potted or dug bare root. Although container production of nursery crops in Canada has grown steadily since first introduced in the early 1950's, in most provinces, field production still makes up the majority of the land in production (Figure 14-18). Field nursery production is in many ways similar to other types of field agriculture. Like other field agriculture, soil must be properly managed including sub-soiling, ploughing, crop rotating, and green manuring.

Figure 14
Example of Field Grown Caliper Trees



Figure 15
Field Grown Hedging Cedars



Figure 16
Field Grown Beech



Figure 17
Field Grown Blue Spruce



Figure 18
Large Field Grown Specimen Spruce



Unlike most field grown agricultural crops, field nursery crops can remain in the field from 2 to 10 years prior to harvesting. Due to the long growing cycle of some nursery crops such as larger caliper trees, both market planning and planning design for field production is an important factor.

Types of plants typically sold from field production by Canadian nurseries include:

- Caliper trees either hand or machine dug
- Conifers
- Hedging (hedging cedars and yews make up a significant portion of field production)
- Shrubs
- Bareroot deciduous trees
- Bareroot shrubs

When field trees are dug with soil attached to their roots they are often called “balled and burlapped.” This digging can be done by hand for smaller sized trees and shrubs or by tree digging machines. When they are dug by hand they are placed into burlap ‘bags’ or daisy baskets (wire mesh), and when dug by a tree-digging machine they are placed in wire baskets. Smaller evergreens and shrubs may be dug by hand and placed into degradable fibre pots.

Advantages and Disadvantages of Field Nursery Production

Advantages of Field Production

Field production has some distinct advantages over container production. These include:

- Plants grown in the field do not need as intensive management as container crops, and so there are decreased input costs
- Plants can be grown to larger sizes in the field and field grown trees are the source of most larger trees used in the landscape
- If market conditions are not favourable for sale, plants can be left in the field, whereas in container production they become root bound
- Larger evergreens do not grow well in containers, and must be field grown above a certain size
- Field grown plants are typically hardier and have higher survival rates when planted out in the landscape

Disadvantages of Field Production

The major disadvantages to field production include:

- Limited harvest time to when the plants are dormant
- Field harvested plants (except for bareroot) are much heavier than similar sized container plants. This increases handling and shipping costs.

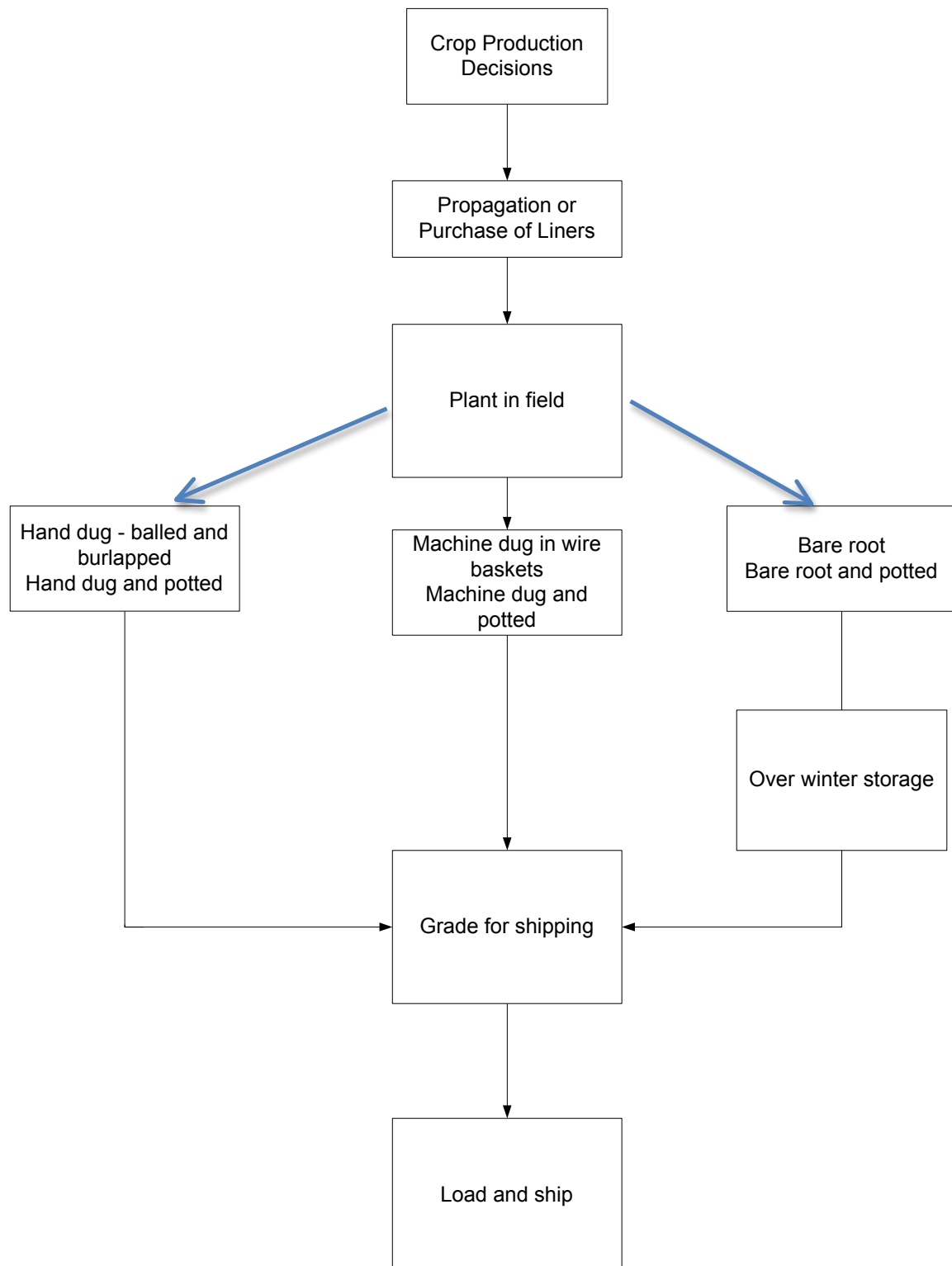
Figure 19

Caliper Trees Hand Dug Balled and Burlapped (B&B)



Figure 20

Flow chart of Field Nursery Production



Audit Administration

As of spring 2012, the Clean Plants program and the CNCI are being administered out of the CNLA office in Milton, Ontario.

Agreement between CNCI and CSI:

The contract agreement is to be approved by CNCI and CSI (see excerpt, Appendix A) by July 1st of each year.

CNCI Staff Functions and Responsibilities

Program administrator

- Communicates with industry regarding program updates
- Works with CNCI board of directors to provide timely and appropriate information and reports
- Answer phone queries and directs technical inquiries
- Manuals:
 - Receives manuals
 - Sends manuals for third party review
 - Returns manuals to growers with comments/changes requested
 - Sends out letter to nursery when manual is approved
- Audits:
 - Receives internal audits directly from nurseries and keeps on file
 - Ensures external auditors have current materials, processes invoices and timesheets
 - Processes payments from nurseries
 - Receives audit reports
 - Sends out letter noting audit success/failure and required remediation
 - Follow-up to ensure conformance
- Database: records data as received from audits, nurseries and other appropriate information.

Technical advisor

- Provides technical assistance, answers questions regarding Certification Standards.
- Provides manual reviews

Financial administrator

- Ensures invoices and payments are recorded and processed
- Collects financial information to provide financial reports

Program manager

- Coordinates program components

CSI Auditor Functions and Responsibilities

Preparation

- CNCI staff organizes the auditor training session(s).
- Auditors attend audit training/refresher session (Skype, conference call or in person) or review audit materials provided by email or from website.
- Annually review the Auditor Training Manual.
- The auditors are required to read the Certification Standards and watch the DVD and/or take part in an on-site workshop. New auditors should watch the Clean Plants video in its entirety to fully understand the program – most auditors who have taken the Lead Auditor training and do audits in other types of facilities will be familiar with ISO or HACCP programs.
- New auditors are encouraged to visit a nursery, learn about aseptic techniques and sanitation, and review the nursery sector in terms of size, market, and value of product. A meeting with an inspector from CFIA as well as a Ministry of Agriculture official is also useful to reiterate why the sector is working on certification as a way to mitigate risk of moving pests and diseases. The type of people in the sector is mostly made up of entrepreneurs who have built their own businesses and always prefer to be outside with plants than inside with paperwork - certification is a learning process for many of our growers.
- Auditors should familiarize themselves with major nursery pests, including *P ramorum* and boxwood blight as well as other pest problems, so they know what is reasonable to see on pest monitoring and surveillance reports, as well as

reasonable pest control records (e.g. reporting spotting on plants would not be reasonable or significant to a non-grower, but it is very important to a production person).

- Up to two weeks prior to the audit, review the Refresher Training Package for External Auditors and Section 7.0 External Audits of the Clean Plants Standard. This provides the complete requirements of the audit.

General Biosecurity Guidelines

- Confirm biosecurity requirements at each site before visiting
- Minimize risk of pest transfer from one site to another by sanitizing footwear between sites

Audit Program

The 2012 year was a transitional year for nurseries across Canada, as the Clean Plants program was revised to minimize duplication and clarify several issues that had arisen over the past few years, as well as the addition of a new pest-specific module. Growers may use the nursery template as approved in earlier years, or may have already revised their template to match the one that is currently on the Clean Plants website. Growers may be audited based on either version.

A module for a new plant disease in Canada, named *Cylindrocladium buxicola* or *C. buxicola* has been completed. Some nurseries may request an audit for this module as well, especially if they are already in the Clean Plants program. The module components will come in two versions:

- 1) A ***C. buxicola*** module for nurseries already on the Clean Plants program. This is a short version; most BMP's are already covered in the Clean Plants program, but there are some specific to *Buxus* (boxwood) plants.
- 2) A **Phase One *C. Buxicola* Program**, which is specifically for nurseries not in the Clean Plants program. This program is targeted towards (but not limited to) nurseries in eastern Canada who are looking for certification to minimize their risk of moving this new pest, but are not currently enrolled in 'Clean Plants'. This program integrates some of the BMP's of the Clean Plants program in a phased approach; nurseries that participate in the Phase One program must advance to a full 'Clean Plants' program after one year on Phase One.

Audit time frames

- Auditor training/refreshers – Annually, by August 1st.
- Audit scheduling – as required, based on the list on the Clean Plants website and the request of the nurseries in cooperation with the auditors.
- Audits performed – All year, but completed in October to be certified for following year.
- Where audits include the *P. ramorum* module, the audits **must take place well ahead of leaf drop**, to ensure that if a nursery has major non-conformances, that the sampling and testing required to become re-certified are completed on fresh, live leaves in fall. Be sure to advise clients with this module of this requirement; if sampling is done after leaf drop, no re-certification for *P. ramorum* is possible until testing is resumed in spring of the following year when leaves re-emerge.
- Audit Reports and Remediation: **within one week of audit completed**. Late or incomplete reports delay the certification process for the nursery. Please make every effort to have complete reports forwarded to the CNCI office by the deadline.
- Successful facilities posted to the CNCI website as and when audits are successful or remediation completed (Sept – Nov).
- Certification seals (Clean Plants stamps) for nurseries sent out by Dec 15th via e-mail.

Process: Delivery of Certification Seals (Clean Plants Stamp)

- 1) Auditors provide their availability dates for audits.
- 2) Nurseries choose their auditor from the CNCI approved auditor list (available on the CNCI website).
- 3) Nurseries and auditors should communicate to minimize costly trips and to effectively manage expenses, as growers are now responsible for the actual auditor expenses. In prior years, growers were all assessed a flat rate to cover auditor travel; this year, the costs are borne by the individual grower. Audits in British Columbia should be scheduled in mid-August for execution during September & October. Audits in the rest of Canada should be scheduled in early summer to ensure execution during the growing season.
- 4) Auditors will be contacted by the individual facilities, and will be provided with audit dates, nursery name and address, and site details. At least one week prior

- to audit, auditors shall confirm the audit date and request the Nursery Manual (with Appendices) from the facility for review in advance of the audit.
- 5) Audits shall be performed/completed by mid-October.
 - 6) The first audit for the Clean Plants program (Phase 1 or full Clean Plants) is a facility audit. The second audit is a full audit. Both audits are performed in the first year.
 - 7) Full audits for nurseries past their first year on the program are required once every three years, determined by a lottery. CNCI will provide the list of audit facilities to CSI and participating facilities each year no later than March 1st.
 - 8) Where an auditor finds non-conformances that are easily remediated on the spot, auditor makes note of non-conformance and also notes that it has been corrected.
 - 9) Auditors shall use the Clean Plants Audit Fee Invoice form to provide service details.
 - 10) Auditor reports shall be provided to nursery, CSI and CNCI administrator within one week of the audit.
 - 11) CNCI Administrator reviews the audit reports, and posts the names of nurseries that have successfully completed audits.
 - 12) CNCI Administrator will follow-up on outstanding non-conformances by letter to nurseries to establish time frame with nursery for conformance and ensure remediation has been done.
 - 13) When non-compliant nurseries have completed remediation requirements or have provided timeframe for implementation (depending on non-conformance issue), the CNCI Administrator will post the facility to the certified list.
 - 14) CNCI Administrator will inform nurseries of their successful status when outstanding non-conformances have been removed.
 - 15) Certification seals (stamps) will be provided to accredited nurseries upon annual fee invoice payment. Invoices are issued in November or December.

Billing, invoicing and payment:

- 1) Billing Process:
 - a. **Maximum allowable time for manual review is 1.5 hours.** Most nursery manuals take about 45 minutes to review.

- b. Track mileage to the nursery and note on the Clean Plants Audit Fee Invoice form (Appendix B)
 - c. Perform audit as required, noting the total time to complete the on-site audit.
 - d. Note return mileage.
 - e. Please note the variable taxes applicable for each province.
 - f. The nursery owner/manager signs the Clean Plants Audit Fee Invoice form.
 - g. Have the nursery owner/manager sign the completed Audit Form.
 - h. Payment for Auditor hours and Expenses is made at the time of the audit. Nurseries may pay by cheque or by credit card.
 - i. Phone the credit card number to CNLA office, or mail a cheque (made out to the CNCI) to 7856 Fifth Line South, Milton, Ontario, L9T 2X8.
 - j. Complete the Audit report. **Maximum allowable time: 1.5 hours**
 - k. Fax or e-mail a copy of the Audit Report Checklist and the Clean Plants Audit Fee Invoice form to both CSI and CNCI. OR use CSI database.
- 1) Actual travel expenses are paid by the nursery
 - 2) Auditors shall invoice CNCI for their time and expenses on their own company invoice.
 - 3) Auditors are paid at a rate of \$60 per hour
 - 4) Other conditions as per the CSI Audit Service Agreement

Resources:

- 1) Clean Plants Nursery Certification Standards (including pest modules):

www.cleanplants.ca

- 2) NAPPO Standards:

RSPM 24: http://www.canadanursery.com/Storage/9/548_RSPM24.pdf

- 3) *Phytophthora ramorum*:

CFIA Webpage:

<http://www.inspection.gc.ca/english/plaveg/pestrava/phyram/sodmsce.shtml>

Sudden Oak Death Mortality Task Force: <http://www.suddenoakdeath.org/>

- 4) *Cylindrocladium buxicola*:

ANLA Boxwood Blight Information Website: <http://www.boxwoodblight.org/>