**Questions and Answers Regarding Clean Plants Standard and Training Materials**

| **Section** | **Question** | **Answer** |
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| General | How does being Clean Plants certified help your nursery? | Clean Plants Certified nurseries represent the cutting edge of horticulture. Like ISO and other systems-based quality assurance programs, Clean Plants provides a distinct marketing advantage. Why? Clean Plants nurseries:   * Offer buyers confidence that they are receiving problem-free goods * Are able to fill orders that spec Clean Plants Certification * Can track the source and destination of all products * Have systems to protect themselves from invasive pests and plants * Help the environment and our foreign trade ability by preventing movement of quarantined and regulated pests * Are equipped to handle incidents of quarantine with limited loss, and are better prepared to manage CFIA requirements |
| General | What’s the downside to Clean Plants? | There is no doubt that you will need to invest both time and money to become Clean Plants Certified. But once the system is in place, most growers find it to be a manageable routine that signifies an increased level of professionalism at their nurseries. |
| General | Is Clean Plants for everyone? | Some nurseries have a clientele that is not concerned with Certification. They may not ship to other growers, or may be highly specialized and localized. Each grower must do their own assessment as to the return on their investment in this program. |
| General | Are there certain buyers that require Clean Plants certified stock? | Several municipalities are planning to require Clean Plants Certified stock; City of Calgary is the first municipality to demand it for 2011. |
| General | What does Clean Plants have to do with “CNCP”? | The Canadian Food Inspection Agency (CFIA) created CNCP for nurseries that ship product internationally on a fairly regular basis. As a rule, CNCP nurseries may not have more than 5% of their plant stock originating from non-CNCP vendors. But, Clean Plants Certified nurseries are an exception to the rule, and can supply CNCP clients. |
| General | Which are the CNCP nurseries? | See the CFIA’s list at http://www.inspection.gc.ca/english/plaveg/protect/dir/cncpcface.shtml |
| General | What happened to the “Domestic Phytosanitary Certification Program (DPCP)? | The name of the Domestic Phytosanitary Certification Program (DPCP) has been changed to “Clean Plants” as of April 16, 2010. Nursery growers have expressed that “DPCP” was a bit of a tongue twister and that the program name should be more reflective of the program’s benefits. |
| General | What is “Phase 1 Clean Plants”? | Since BC nurseries certified in the *P. ramorum* Certification Program are already implementing many of the processes and measures required for the Clean Plants program, including inspections, monitoring and record keeping, it was determined by CNCI that, under certain criteria, *P. ramorum* Certified Nurseries should have the option of becoming certified under the “Phase 1 Clean Plants” gradual integration program. |
| General | Could a completed manual be provided for nurseries to use as a reference? | We considered and decided against providing examples for questions in the Manual.  It is important to allow each nursery to develop answers for their operation. It’s important that you write and understand your customized manual. Your company is unique, and so must be its systems so they make sense to the business you run. |
| General | The manual is 83 pages long?! | Yes. But the majority includes helpful info and checklists, and does not require written comment; some sections may not apply to you—in that case, simply mark them N/A. |
| General | Do directors of the CNCI review the Manuals submitted by growers? | The directors do not see the Manuals, which are reviewed by independent contractors who are not nursery growers. |
| 1.0 | Why does CNCI need to know if land is either owned or leased by a nursery making application? | There is no need to specify which parcels of land are owned and which are leased in the Nursery Manual. However, properties, whether owned or leased, need to be described by size and location (address). The intent is to ensure that all production areas, owned and leased, are included under one application. |
| 2.1 | What are the training requirements for the CM and CPM and their alternates? | * The CM and CPM must review the Clean Plants [Standards](http://www.cleanplants.org/clean-plants-certification-standard.html) and [Training materials](http://www.cleanplants.org/training-materials--tools-and-links.html). * Alternates for the CM and CPM must be trained on site in all aspects of their respective responsibilities as listed in the Standard*.* * Training sessions must be recorded (name, date, discussions) in an Appendix of the Nursery Manual (See Appendix 20 for an example.) |
| 2.1 | Is the Inventory Manager no longer required?) | Correct.  Last winter, the first draft of the Manual had a description of this job title and a requirement to name a person.  However, this requirement is not listed anywhere in the Standard and was removed in August during a clean-up of the Manual. |
| 2.1.3 | What training is required for the Internal Auditor? Is an auditing course required? | The CNCI has developed a **Clean Plants Internal Auditor Basic Training Package** to satisfy the training requirement stated in Section 2.1.3 in the Standard. The contents of this package include a brief overview document entitled “[**General Overview**](http://www.cleanplants.ca/Storage.asp?StorageID=1082)”, and a Power Point presentation entitled “[**Internal Audit Procedures**](http://www.cleanplants.ca/Storage.asp?StorageID=1087)” designed to provide step-by-step assistance in the audit process. These two documents can be downloaded from the www.cleanplants.ca website under “Clean Plants” under “Training Materials, Tools and Links”.  Successful completion of a third-party basic auditor course available from a number of commercial sources is voluntary, and not required by the Clean Plants program. |
| 2.2 | What are the training requirements for the shipping and production managers? | * The shipping supervisor/manager and the production/inventory manager and their alternates must be trained on site by the CM or CPM. * Requirements for plant product handling and inspection must be clearly understood. Topics can be tailored to each staff position but should include:   Inspections (receiving, shipping, monitoring)  Time required for Certification  Locations of Certified and non-certified plant material  Special requirements for CNCP customers  Recording procedures  Pest management plan procedures   * Training sessions must be recorded. (See Appendix 20 for an example.) |
| 2.2 | The standard requires that certain functions like inspection of plants at receiving and shipping or pest scouting or pest control operations be performed only by specific staff persons that are listed in the manual. Occasionally others help with these tasks or fill in during an absence of one of the delegated persons. Must every person who ever does one of this sort of activity have to be listed in the manual? Doing so will require constant amendments to the manual. | Yes, it is acceptable for others to support your primary delegated and listed Clean Plants workers. These assistants should initial or sign records as would the primary person. It is also important that these people have been given adequate training to do the jobs even when they only occasionally fill in. This must appear on their training record. You would not have to list in the manual everyone who ever might fill in. If an auditor challenged a record showing such a person had done a job he or she could be given the explanation of why they were helping and shown the training record to prove they were capable. |
| 3.1 | Where should nursery maps be posted and accessible at the nursery? | The nursery map(s) must show the greenhouses/polyhouses, zones, blocks, or fields that are used for plant production. These areas are usually assigned words, letters, or numbers (often a combination) that are meaningful to nursery staff when locating plant product on the nursery. These plant product growing locations, when referenced in an inventory database or on an inventory list, will facilitate CFIA or the external auditor when tracking plant material to the last growing location on the nursery. Maps showing all production areas must be available to auditors (usually in the main office or production office). Posting maps in areas frequented by employees (lunch room, shipping area, etc.) will improve accessibility. |
| 3.2.1 | What level of detail is needed when listing suppliers of plant product that is received at the nursery? Do you need to know where every single plant has come from? | A current list of plant suppliers along with a list of plant product that is purchased from each of the suppliers is a requirement of Clean Plants. For small nurseries with minimal plant product purchases, this could mean a current file of plant supplier invoices. For large nurseries that bring in a variety of plant products from a variety of plant suppliers, the detailed list will need to be more elaborate. Plant material of the same age/species sources from a variety of suppliers can be cross referenced to the group of suppliers rather than each plant to a specific supplier, if there is no possibility that the plant material will be exported to the US or sold to a CNCP customer for export (see below).  There are two purposes of the plant supplier list.  1) The first purpose of the supplier list is to aid CFIA inspectors is there is a pest find at your nursery (regulated pest or a new exotic pest). During the trace back process, the inspectors will require the origin of the plant product in order to determine how and when the pest entered your nursery.  2) The second purpose of the supplier list ties in with section 3.2.3 in that the origin of the plant material must be know if this material is sold to a CNCP nursery or if you will be exporting this product to the US directly. There are many plant Genera that are restricted from entering the US outright and other plant Genera are restricted entry unless the plants have been grown in Canada for one calendar year (365 days). If you are not sure where the plant product came from or how long it was on your nursery, this US import criteria cannot be met. Note that this is a requirement whether you are a Clean Plants Certified nursery or non-certified nursery. See US import restrictions at <http://www.aphis.usda.gov/import_export/plants/plant_imports/quarantine/downloads/7cfr31937-2.pdf> Restrictions are also listed in the CNCP Directive D-04-01 (Appendix 1, part C) at <http://www.inspection.gc.ca/english/plaveg/protect/dir/directe.shtml#2004> |
| 3.2.1 | Is it mandatory to include the list of my suppliers with my Manual? | Including a supplier list with your manual is optional. However, you must state how and where the list of suppliers is stored so that it can be accessed by an auditor or a staff member. |
| 3.2.2 | In the Standard if the source/origin of some plant material cannot be identified, can that stock not be certified even if the plants have been in the nursery for over 120 days and have passed an audit? | If the plants are to be sold within Canada and will not be exported to the US, either directly or through a CNCP nursery, the stock can be placed in the Clean Plants Certified section of the nursery after the 120-day growing period. A growing season internal audit will have been completed during that time period. However, if the stock is to be exported and the origin of the stock cannot be verified (cannot verify that the plants have been grown in Canada for 365 days or one calendar year) then the plants cannot be Clean Plants Certified and cannot be exported to the US.  (Note that the origin restrictions on exports to the US are specific to plant Genera. These export rules are in place for any exporting nursery, either non-certified or Clean Plants Certified, as the rules are US import requirements and not specifically requirements of the Clean Plants program. See import restrictions at <http://www.aphis.usda.gov/import_export/plants/plant_imports/quarantine/downloads/7cfr31937-2.pdf> ) |
| 3.3 | Standard 3.3 Inspection of incoming plants  Second paragraph, "must be kept segregated from other plants...".  There is no definition of the segregation area, either here or in the glossary.  Thus, a 6-inch border could qualify as "segregated".  What is a segregation area?  Is there a minimum distance that must be maintained between the area where Certified plants are located and the area where non-certified plants are kept? | The segregation areas are in the production area(s) and are where plant products are separated into Certified and non-certified groups. All plant shipments received at the nursery are inspected before entering the production area and should be clean. The segregation areas must be visible, delineated, and identified to ensure that all staff working at the nursery knows which area is for Certified plants and which area is for non-certified plants. The segregated areas could be separate beds, blocks, zones, fields, polyhouses, or bays within a gutter connected greenhouse. There is no requirement for space in between the Certified and non-certified areas.  If plants are found to be infested during monitoring, in either the Certified or non-certified areas, a pest control strategy must be put in place immediately. This **may** include movement of infected plants to an ‘isolation area’ in which case separation distances would relate to the pest being controlled. If the pest is regulated, CFIA must be notified immediately and the requirements within the CFIA directive regulating that pest must be followed.  If your staff feels that the non-certified plant material may harbor pests that are difficult to detect (eggs, larvae in the growing medium) during the inspection at receiving, the plants could be ‘isolated’ from other plants in the non-certified block. The separation distance should reduce the risk of transferring the pest to other plants on your nursery.  Note: ‘residency’ means that period of time required for Certification (one growing season for outdoor crops/ one growing cycle for protected crops). |
| 3.3 | "Intermingling such non-certified...", when read for the current grammar, implies that non-certified plants can be intermingled with certified plants as long as identity of non-certified is maintained.  Is the intent of the standard is to prevent movement of pests from non-certified to certified? | Don't confuse your perception/term of a "segregation area" with the Standard's term "isolation area" as use in the first paragraph of this section.  ‘Isolation area’ means an area of the nursery set aside to hold plants that may pose a pest risk to other plants on the nursery is defined in the Standard.  The segregation referred to in this sentence is for identity (non-certified or Clean Plants Certified) and not pest factors.  Note: ‘segregation’ means separation of plant product into Certified and non-certified areas. If plants are found to be infested either a Certified or non-certified area a pest control strategy must be put in place immediately. This may include movement of infected plants to an ‘isolation area’ in which case separation distances would relate to the pest to be controlled. If the pest is regulated, CFIA must be notified immediately and the requirements within the CFIA Directive regulating that pest must be followed. |
| 3.3 | Some nurseries have a garden centre near the production site. Non-certified plants may arrive at the garden centre without going through the nursery. Would his potentially affect the certification of the nursery? | The retail garden centre is an uncontrolled and non-certified environment and cannot be certified under the Clean Plants program. All plants at the garden centre cannot be Certified, regardless if they originated from a Clean Plants certified nursery or not.  Movement of any plant from the retail centre to the Certified nursery would be the same as movement from a non-certified nursery to a Certified nursery. All plant groups moved into the nursery must be inspected for pests as they enter the nursery and placed in the non-certified production area for the appropriate time period. Origin (location of the original supplier before entering the garden centre) of the plant material should be recorded, especially if the plants were from a foreign supplier.  Thus, Certified plant material moved from your nursery into the garden centre will lose their Certification status and would have to be returned to the nursery as uncertified stock. |
| 3.4 | Bulbs brought in and shipped out of a Clean Plants grower – are they certified? | A bulb is simply a particular stage in the life of a plant and would fall under the definition of “nursery stock” found in the glossary of the Clean Plants Standard. Therefore, bulbs need to comply with the requirements of the Standard including those of section 3.4. |
| 3.4 | Must plants or plant parts (includes seed) for propagation collected off the nursery site (natural sites or otherwise) be inspected at receiving and placed in the non-certified area of the nursery? | Plants or plant parts that have not been grown under your supervision (this includes cuttings and seed from natural sites and non-nursery sites) and are not from a Certified source must be considered uncertified stock. Therefore, this stock must be inspected when received at the nursery, and placed in the non-certified area. Plant parts or seed brought in for propagation require one growing cycle (28 days) if they are propagated in a protected environment to become Clean Plants Certified if the plants are for domestic sales only (see exporting requirement in the next question). |
| 3.4 | If a nursery grower has used cuttings from non-certified plants and the origin of these plants is unknown, can the plants/cuttings get Certified after 120 days and an [inspection] audit? | Plant origin (includes source of cuttings, seed or any other plant part) is important especially if this material is sold to a CNCP nursery or if you will be exporting this product to the US directly. There are many plant Genera that are restricted from entering the US. Other plant Genera are restricted entry unless the plants have been grown in Canada for one calendar year (365 days). If you are not sure where the plant product came from or how long it was on your nursery, this US import criteria cannot be met. Note that this is a requirement whether you are a Clean Plants Certified nursery or non-certified nursery. See US import restrictions at <http://www.aphis.usda.gov/import_export/plants/plant_imports/quarantine/downloads/7cfr31937-2.pdf> Restrictions are also listed in the CNCP Directive D-04-01 (Appendix 1, part C) at <http://www.inspection.gc.ca/english/plaveg/protect/dir/directe.shtml#2004>  In summary, if the origin of the seed or cuttings is not known and the plants grown on from these sources are to be exported, directly or through a CNCP source, the plants cannot be Clean Plants Certified until you have proof that they have been grown at your nursery for one calendar year (365 days). However, if the propagated plants are for domestic sales only, they can become Clean Plants Certified in one growing cycle (28 days) when they are grown in a protected environment (polyhouse or greenhouse). |
| 3.4 | Should sources of soil, soil amendments, and soilless media be recorded for Clean Plants? | Soil and soil amendments are not addressed directly by the Clean Plants Standard. However, all deliveries should be recorded (simple file of invoices is adequate). Appendix 6b does chart the D-memos that include soil or soil amendments in the regulations. The Directives are available on the CFIA website under “Plants” (left sidebar) [www.inspection.gc.ca](http://www.inspection.gc.ca) |
| 3.4 | Grammar needs clarification at second bullet,  "have been inspected at the originating facility or at your nursery by the CFIA", does it mean by CFIA for both cases or only at your nursery? | By CFIA for both cases. This has been revised in the current version of the Standard. |
| 3.4 | Is a USDA phyto from the originating facility plus a border inspection by CFIA sufficient to certify plant stock?  Note: the CFIA 1337 inspection report is issued if CFIA inspectors are asked to inspect imported nursery stock at the nursery site. | A US Phytosanitary Certificate, along with a border inspection buy CFIA, is sufficient to Certify plant product under Clean Plants. Therefore, plant material that arrives at your nursery with a US phytosanitary certificate will be considered Certified and can be placed (after completing your own receiving inspection) into the Clean Plants Certified production area.  However, plants or plant parts, including seed, from countries *other* than the US are considered non-certified. The country of origin must be recorded at receiving. If these plants are for domestic sales, the plants must be grown for one growing cycle (protected area) or one growing season (outdoors) as with other non-certified plants. However, if these plants are to be sold to a CNCI customer for export or exported directly by your nursery, the plants may be restricted from export outright (depends on the plant Genus) or be restricted and considered non certified until they have been grown at your nursery for one calendar year (365 days). See US import restrictions at <http://www.aphis.usda.gov/import_export/plants/plant_imports/quarantine/downloads/7cfr31937-2.pdf> Restrictions are also listed in the CNCP Directive D-04-01 (Appendix 1, part C) at <http://www.inspection.gc.ca/english/plaveg/protect/dir/directe.shtml#2004> |
| 3.4 | What is the reasonable trace back period? After the required one growing season (defined as plant growing for at least 120 days + audit)?  The reality, according the participants, is that "trace back" is not possible past the requirement of one growing season.  Similar plants from different sources have identity maintained with tags for the required duration, but then are repotted + retagged + all mixed together without segregating the different suppliers. | Trace back only required for one growing season. Trace back is required for CFIA inspectors investigating serious pest finds. If there is a serious pest, which may or may not be regulated, found on plant material which is traced back to your nursery, CFIA inspectors will need to inspect the location where the plants were last grown to determine if your nursery was the source of the pest. If the growing location is known and documented, and the inspectors are satisfied that the area is ‘clean’, interruptions to your business activity will be potentially minimized. If the last growing location is not known or not documented (on the pick/pull slip or in the inventory database), the whole nursery could be scrutinized which will take longer and be potentially more disruptive to your business activity.  Note the ‘audit’ referred to in the question is either the production season internal audit or the annual external audit. |
| 3.4 | Our nursery sometimes has its certified plants returned by customers, particularly landscapers. Can these plants be returned to the production area and are they still considered certified? | You may accept returns, but they would be considered uncertified stock and have to be subjected to the same processes as any plant entering the nursery from non-certified suppliers. These plants may have been mixed with others, and may have been infested while off your nursery and simply can’t be assumed to be in the same conditions they were in when you shipped them.  They should be inspection at arrival and would only be considered certified when they have filled the requirements specified in section 3.4 (one growing season for outdoor grown plants and one growing cycle for greenhouse grown plants plus be audited once during a growing season). |
| 3.5 | Inspection at shipping  Wording is "All plants must be inspected...".  The implication is every single plant without missing one.  This is not practical and could lead to major non-conformance.  By comparison, Standard 3.3 Inspection of Incoming Plants says "Each shipment of plants...".  This is more realistic. | ‘All plants’ should be interpreted as ‘all plant shipments’. The intent is that all plant orders are inspected at some sort of reasonable sampling rate which the nursery would determine based on their experience. This has been revised in the current version of the Standard. |
| 3.5 | Can a Clean Plants certified nursery allow a customer to dig and inspect their own plants? | A Clean Plants certified nursery of field stock could allow this sort of “self-serve” pick up, providing that the plants were monitored and documented on a regular basis, and preferably just prior to pick-up.  IN ADDITION the buyer must sign off on a form stating that he/she did a visual inspection and is satisfied the plants are “practically-free” of regular pests at the time of collection.  If this is the regular practice of the nursery, it is recommended that the nursery had a more focused monitoring process in place.  A Clean Plants certified nursery of containerized stock must implement a “pick-up zone” where their buyers can collect. The plants in this “pick-up zone” must be inspected and documented just prior to pick up and plants must not be left there for more than a brief period of time. IN ADDITION the buyer must sign off on a form stating that he/she did a visual inspection and is satisfied the plants are “practically-free” of regular pests at the time of collection. Pick-ups will only be allowed during nursery hours. The reasoning behind these requirements are so the plants are not waiting for days after the final nursery inspection, and so there is nursery staff is there to verify pickup. |
| 3.5.1.1 | Appendix 5, 6a and 6b address regulated pests.  Will these Appendices be updated by the program?  Regulated pests change from year to year, how can certified nurseries remain informed?) | The Clean Plants program is designed for the certified nursery to be responsible for updated information.  Possibly, important changes would be sent to certified nurseries by CNCI correspondence.  The Manual should describe how the nursery intends to remain up-to-date.  Examples include: printing the relevant CFIA D-Memos and place them in a binder at the nursery, instructing a specific employee to review the information annually, consulting the CFIA website (see the address at Standard 5.1), or by subscribing to the CFIA electronic mailing on changes to D-Memos, at websites:  <http://www.inspection.gc.ca/english/tools/listserv/listsube.shtml> or <http://www.inspection.gc.ca/francais/tools/listserv/listsubf.shtml>. |
| 3.5.3 | An observation that Shipping only ‘practically free’ or better was too onerous and even tougher than CNCP requirements. | Version 1.2.1 of the Clean Plants Standard clearly states that shipments must be ‘practically free’ of other pests. It then goes on to define how many pests could be present in an order that is still able to qualify as ‘practically free’. The definition provides quite a bit of flexibility and room to consider plant orders with minor infestations that are normal for the time of year and for the weather conditions to be considered ‘practically free’ and therefore qualify to be shipped as certified material. The language in Section 3.5.3 and in the definition of ‘practically free’ was intended to include the sort of pest presence we would generally be associate with good cultural practices (either IPM or traditional) in the production and marketing of nursery stock. In short, a few non-regulated pests at a level at or below what would be considered normal can be shipped as certified since they fall under the threshold of ‘practically free’. |
| 3.5.3 | The word "residency" is used here (third paragraph), and can be interpreted to mean "where was it grown at the nursery?", but the word is not defined clearly here and not present in the glossary. | ‘Residency’ means the time required for Certification. For outdoor crops, plants must be grown at your nursery under the terms outlined in your Clean Plants Nursery Manual for a period of one growing season or 120 days. For crops grown in a protected environment (greenhouse/polyhouse) plants must be grown under the terms of your Clean Plants Nursery Manual for one growing cycle or 28 days. However, if the plants are destined for export or sale to a CNCP nursery, they may have to be on the nursery site (or within Canada) for one calendar year (365 days). Note that this export option will only affect specific Genera listed by US import regulations. |
| 3.5.3 | There is a common practice in Québec for a nursery to sell plants to a shipper, who loads the truck, then goes to another nursery to pick up other plants.  If the first nursery is certified and the second nursery is not certified, does it mean the certified plants from the first nursery lose their status because they are mixed in the truck with the non-certified plants from the second nursery?) | In the scenario presented, it would be possible to ship plants from the 2 nurseries in the same truck, provided a method of identification is used so the person opening the doors of the truck knows which plants are certified and which plants are not certified.  Standard 3.5.3 (3rd paragraph) and Standard 3.6 (2nd paragraph) allow for mixed loads containing both certified and non-certified plants, provided the shipper maintains the identity of the different plants. Maintaining identity is important in Clean Plants: it can be done by physical separation, distinct labels, or some variation on those methods.  Note: Plants are no longer certified under an *uncontrolled* situation. For example, when they are dropped at a landscape project, or placed for public view at a garden center, etc. |
| 3.5.3 | Can nurseries sell plants with pest problems above the level of ‘practically free’ as *non-certified stock*? | The short answer: a plant with a recognized pest problem, more than ‘practically free’, cannot be sold either as certified or non-certified.  The major objective of Clean Plants is to reduce the movement of pests on nursery plants.  Therefore, it makes no sense to allow the sale of pest infested plants and the Certified nursery should not be doing such a practice. |
| 3.5.3 | Manual part E Shipping inspection, in the checklist, it says "Non-certified plants must be separated from certified plants...".  Does "separated" include different labelling, not only physical separation? | "Maintaining identity" includes physical separation or distinct labelling, or similar methods. |
| 3.5.3 | Many persons are annoyed by the words ‘practically free’ and wish to have a standard or a threshold that would avoid confusion. | Many are frustrated by the term ‘practically free’ but once understood most people find it quite useable.  The Standard provides a clear explanation that ‘practically free’ expected from a grower using recognized good growing practices, and this may include pest problems ‘normal’ for the time of year or the weather conditions.  The nursery must provide its own definition of ‘practically free’.  Ask yourself: when you look at a plant that has pests, when do you decide to ship it or to not ship it?  Clearly, there is room for variation within the definition of practically free.  In writing a manual it is important to describe who will make the decision on questionable plants and on what criteria that decision will be made.  Factors may include customer expectations, seasonal variation, expected impact on plant health, potential spread to other plants etc.  A precise definition would take away all discretion and flexibility from the nursery which was not CNCI's intention. |
| 3.5.3  &  3.2.4 | Must I always use “non-certified” as a means of such identifying plants on the shipping documents? If the receiver does not fully understand what this means he or she might react inappropriately and reject the load or cause other problems even though the customer who ordered the plants was fully aware. Could I use some less negative notation to identify the plants that don’t qualify for certification? | No. If the plants fail to qualify for certification they are effectively ‘non-certified’. It is difficult to imagine a set of words that would be less negative and still convey an accurate message to the buyer. It is acceptable to include an explanation as to the reason for the non-certified status. It is likely that those reasons will not be perceived as negative for the particular plants involved. |
| 3.6 | Does a Clean Plants grower have to always use their stamp?  Eg. A grower sells a small order of plants to a landscaper and the qualified person is not on hand to actually use the stamp, so they just don’t bother – and the customer doesn’t care – so the stamp isn’t used. | To simply not bother using the stamp could cause confusion for buyers at a later date and to a possible trace-back if there was a problem at the receiver’s end. This practice is not encouraged. |
| 3.6 | Does the ‘country of origin’ need to be on all shipping documentation? | The “Country of Origin of Plant Material” requirement has been removed in the current version of the Standard.  Including the “country of origin” in the shipping documentation along with the use of the Clean Plants stamp is in error. Originally, the intent was to have all plants that were Clean Plants Certified ready for CNCP nurseries to export. Some species can not be shipped to the US if the country of origin (within one calendar year of receipt) is not Canada. Therefore, the country of origin will need to be declared for exports (through a CNCP nursery or directly). However, this requirement is not necessary for domestic sales (local and within Canada).  Note that the country of origin for plant imports changes to Canada if the plants have been grown in Canada for more than one calendar year (365 days). |
| 4.1 | What training is required for the Internal Auditor? Is an auditing course required? | The CNCI has developed a **Clean Plants Internal Auditor Basic Training Package** to satisfy the training requirement stated in Section 2.1.3 in the Standard. The contents of this package include a brief overview document entitled “[**General Overview**](http://www.cleanplants.ca/Storage.asp?StorageID=1082)”, and a Power Point presentation entitled “[**Internal Audit Procedures**](http://www.cleanplants.ca/Storage.asp?StorageID=1087)” designed to provide step-by-step assistance in the audit process. These two documents can be downloaded from the www.cleanplants.ca website under “Clean Plants” under “Training Materials, Tools and Links”.  Successful completion of a third-party basic auditor course available from a number of commercial sources is voluntary, and not required by the Clean Plants program. |
| 5.2 | Pest detections and control  Wording is "all incoming plants must be inspected for pests".  As commented before, the words imply every single plant must be inspected, which is not realistic and different from the words in Standard 3.3 "Each shipment must be inspected". | The intent is that all plant orders received at the nursery are inspected at some sort of reasonable sampling rate which the nursery would determine based on their experience and the risk that the plant material could harbor a plant pest. The intention was never to demand that 100% of the individual plants be examined. More accurate wording would be “All shipments…”  This has been revised in the current version of the Standard. |
| 5.3 | What are the requirements for bio-security? | Biosecurity should be part of the pest control strategies used on your nursery. Specific biosecurity requirements relate to Clean Plants Pest Specific Modules such as *P. ramorum*; as well as to domestically regulated pests, which can be found within the appropriate CFIA directives. For CFIA directives, see [www.inspection.gc.ca](http://www.inspection.gc.ca) under ‘Plants’ on the left, then look for the ‘Plant Protection Policy Directives’ on the right. |
| 5.3 | Before loading plants, does a shipper needs to wash the truck? | No. The requirement to wash the shipping truck is a ‘recommended practice’ in the Clean Plants Pest Specific Module *P. ramorum* Certification in British Columbia, because the pathogen can travel from nursery to nursery on plant debris.  This practice is not mandatory for the *P. ramorum* module, and neither is it required for nurseries not enrolled in the *P. ramorum* module.  Each nursery should design the biosecurity measures they think are appropriate for their site and their risk assessment.  For example, a nursery in Québec receiving Rhododendron plants from Oregon (high risk plant for *P. ramorum* from high risk region) could implement their own biosecurity measure and ask for the truck driver to sweep plant debris into garbage bags, not down on the ground. |
| 5.3 | Some nurseries re-use their containers.  We understand potting mixes are not addressed specifically in Clean Plants, however, would the practice of re-using containers that may be carrying spores of pathogens (such as Phytophthora) impact the certified status of plants?  Would a newly-potted plant in a reused container be non-certified and need to meet residency requirements? | This question is much like an earlier one regarding washing of trucks.  This is a biosecurity concern to be addressed at each nursery as required by any Clean Plants Pest Specific Modules or any CFIA regulated pest programs that the nursery participates in. The re-use of pots is therefore not controlled by the Clean Plants Standard but may be controlled by any Pest Specific Module that might apply to a nursery. The biosecurity section of the Clean Plants standard was intentionally left non-prescriptive as most biosecurity measures are driven by the biology of the particular pest involved. |
| 5.5 | Can’t find this section in my version | This section was deleted from Version 1.2.1 and beyond. |
| 6.0 | If changes to the Appendices are made, does the nursery manual need to be resubmitted as well? | Generally minor amendments to appendices would not trigger a requirement to re-submit the whole manual to CNCI for approval.  However, if a nursery has formatted their manual so that essential portions of their certification system are described exclusively in an appendix and that appendix is changed, a re-submission should be made.  The intent is that substantive changes to process be documented and submitted as a revision while minor amendments to appendices need not trigger a re-submission each time one is made.  If there are substantive changes to a nursery map or production areas (for example fields added or deleted or new production areas leased), new maps should be submitted to CNCI to be added to the Clean Plants Nursery Manual. |
| 7.2.9 | What is the timeline for implementing corrective actions? | The timeline for implementing corrective actions is to be determined by the nursery to ensure that the process is flexible to the situation at that site. However, (note box at the bottom of the Clean Plants Corrective Action Request Form, Appendix 9a) CNCI Adjudication Committee will oversee the corrective action requests and monitor the date of completion. Presumably, if the corrections are taking too long, stronger action can be used to trigger compliance, but as this program is voluntary, nurseries should not be put in a financially difficult situation. In all cases the corrective action must be made before the next external audit (this is the maximum time that will be allowed). |
| 7.4.3 | How much are the Audit Fees? | The audit hourly rate is $100.00 plus travel expenses. The final audit bill will largely depend on how long it takes. Audit fees will depend on the size and complexity of the facility and of the audit required and on the degree of preparedness of the nursery. |