



# **QSM - 02**

## **4th Revision**

### **Quality System Requirements For Facility Registration under the Canadian Wood Packaging Certification Program (CWPCP)**

**or**

### **the Canadian Heat Treated Wood Products Certification Program (CHTWPCP)**

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## Table of Contents

Contact and Review .....	4
Endorsement .....	4
Amendment Record .....	4
Distribution .....	4
Introduction .....	5
1.0 Scope .....	5
2.0 References.....	5
3.0 Definitions, Abbreviations and Acronyms .....	6
4.0 Registration.....	6
4.1 Application for Registration .....	6
4.2 Facility Registration.....	6
5.0 Facility Management Responsibility .....	7
6.0 Manual Elements Required of All Facilities Registered in the CHTWPCP or CWPCP .....	7
6.1 Administration .....	8
6.2 Structure of the Organization.....	8
6.3 Training.....	8
6.4 Non-Conformances .....	8
6.5 Internal Quality Audits .....	8
6.6 Amendment of the Manual .....	8
6.7 Identification of Heat Treated Wood Products produced under the CHTWPCP or CWPCP.....	9
6.7.1 Identification of Heat Treated Wood Products for Domestic Movement .....	9
6.7.1.1 Receiving .....	9
6.7.1.2 Shipping.....	9
6.7.1.3 Consolidation of Wood Products.....	9
6.7.2 Identification of Heat Treated Wood Products (other Than Wood Packaging Material) for Export .....	9
6.7.3 Identification of ISPM No. 15 Compliant Wood Packaging Material	10
6.7.4 Identification of Attached Dunnage.....	10
6.8 Segregation of wood .....	10
6.9 Heat Treatment Certificate.....	10
6.10 Purchasing.....	10
6.11 Document Control.....	11
7.0 Specific Elements for Registered Facilities Heat Treating Wood Products .....	11
7.1 Heat treatment chamber .....	11
7.2 Treatment options .....	11
7.3 Treatment documentation .....	11
7.4 Treatment Records.....	12
7.5 Verification of the Measuring System .....	12

7.6	Final Moisture Content .....	12
8.0	Specific elements for Wood Packaging Material.....	12
8.1	Use of Debarked Wood in the Production of Wood Packaging Materials for Export .....	12
8.2	Specific Elements for Facilities Producing Wood Packaging Kits to be Assembled in a Non-Registered Facility .....	12
8.3	Specific Elements for Facilities Applying the Wood Packaging Certification Mark Outside the Registered Facility .....	12
8.4	Special Requirements for wood products originating in regulated areas for quarantine pests.....	13
8.5	Specific Elements for Facilities Repairing Previously Certified Wood Packaging Material .....	13
8.6	Specific Elements for Facilities Re-manufacturing Previously Certified Wood Packaging Material.....	13
9.0	Registration Approval Process.....	13
9.1	Quality Manual Review .....	13
9.2	Evaluation Audit .....	13
9.3	Verification Audits.....	14
10.0	Non-Conformance.....	14
10.1	Minor Non-Conformances .....	15
10.2	Major Non-Conformances .....	15
10.3	Observations .....	16
11.0	Enforcement.....	16
11.1	Suspension of Registration .....	16
11.2	Cancellation of Registration .....	16
12.0	CFIA System Audits of the Program .....	17
	Appendix 1 Activities and Audits on Facilities monitored by Service Providers (other than those CLSAB Accredited Grading Agencies identified as Service Providers under the CHTWPCP or the CWPCP. ) .....	18
	Appendix 2 Activities and Audits on Facilities monitored by CLSAB Accredited Grading Agencies identified as Service Providers under the CHTWPCP.....	19
	Appendix 3 Examples of non-conformances at the facility level.....	20

## Contact and Review

This manual will be updated every 2 years. For further information or clarification, please contact the Canadian Food Inspection Agency (CFIA).

## Endorsement

Approved by:

\_\_\_\_\_  
Joanne Rousson, Project Coordinator

\_\_\_\_\_  
Date

\_\_\_\_\_  
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\_\_\_\_\_  
Date

## Amendment Record

Number of amendment:	Amended by:	Date of submission for approval of Amendment:	Summary of amendment and number of amended page(s):
1	Mireille Marcotte	September 8, 2009	Housekeeping throughout the document re: glossary of terms and removal of references to the former KD/HT Program; Addition/updating of elements that need to be part of the facility's manual re: debarking (section 7.1.3), repair and remanufacturing (section 7.4), pallet kits (section 7.6) and stamping off-site (section 7.7); Section 7.1.6 Adding: The CFIA Network Specialist must be notified whenever a significant change is made to the facility's operating procedures; Section 8.1.2 and 8.2 Adding: The facilities must be available for audits by the Service Provider and/or the CFIA within 24 to 48 hour notice.
2	Jean-Luc Poupart	June 7, 2010	Revision of specific elements
3	Shamina Maccum	February 18, 2011	Removed reference to D-03-02 regarding wood packaging material
4			
5			

## Distribution

1. Directive mail list (Regions, Areas, PHRA)
2. National Industry Organizations (determined by Author)
3. Service provider
4. CHTWPCP and CWPCP Working Group
5. Internet

**Note:** For the purpose of this document, a registered facility is a facility that has applied and has been approved by the CFIA to participate in the CWPCP or the CHTWPCP.

## Introduction

The Quality System Requirements For Facilities Under The Canadian Wood Packaging Certification Program (CWPCP) or The Canadian Heat Treated Wood Products Certification Program (CHTWPCP) is a supplementary document to CFIA Policy D-03-02, *Canadian Heat Treated Wood Products Certification Program (CHTWPCP)*, CFIA Policy D-01-05, *Canadian Wood Packaging Certification Program (CWPCP)* and The Technical Heat Treatment Guidelines and Operating Conditions Manual (PI-07).

This manual outlines the registration and operating requirements of:

1. Registered facilities heat treating wood products (lumber, logs or wood packaging material).
2. Registered facilities manufacturing, producing or consolidating heat treated wood products for export (broker, wood packaging facilities, pre-fab homes, remanufacturing facilities, etc.)
3. Facilities heat treating and/or exporting heat treated wood products covered by a Phytosanitary Certificate (pre-fab homes or heat treating facilities).

### 1.0 Scope

This document is intended for the use by facilities registered under the CHTWPCP and CWPCP, CFIA Service Providers, the Canadian Lumber Standards Accreditation Board (CLSAB) and its accredited grading agencies where applicable, involved in these (2) two programs, CFIA inspection staff and any other CFIA authorized parties. This document outlines the requirements for facilities seeking registration and ongoing operation under these programs.

### 2.0 References

- ISPM No. 5, Glossary of Phytosanitary Terms, FAO, (updated annually)
- ISO Guide 8402, Quality Systems Terminology.
- ISPM No. 15, Regulations of wood packaging material in international trade, FAO.
- ISPM No. 7, Export Certification Systems, Publication, FAO.
- CFIA Policy D-01-05, the Canadian Wood Packaging Certification Program.
- CFIA Policy D-03-02, the Canadian Heat Treated Wood Products Certification Program.
- CFIA PI-07, the Technical Heat Treatment Guidelines and Operating Conditions Manual
- Canadian Lumber Standards Accreditation Board Regulations
- QSM-05, Quality System Requirements for CLSAB and CLSAB Accredited Lumber Grading Agencies Approved under the CHTWPCP

### **3.0 Definitions, Abbreviations and Acronyms**

Definitions for terms used in the present document can be found in the Plant Health Glossary of Terms at [www.inspection.gc.ca/english/plaveg/protect/dir/glosterme.shtml](http://www.inspection.gc.ca/english/plaveg/protect/dir/glosterme.shtml).

### **4.0 Registration**

#### **4.1 Application for Registration**

A facility seeking to register under the CFIA Policy D-03-02 or D-01-05 must adhere to the administrative and operational requirements outlined in this document. A signed application for registration and a copy of the facility's Quality Management System Manual (herein referred to as the manual) must be sent to a CFIA recognized Service Provider. A list of recognized Service Providers can be found on the CFIA Forestry web site at [www.inspection.gc.ca/english/plaveg/for/fore.shtml](http://www.inspection.gc.ca/english/plaveg/for/fore.shtml).

The manual must outline the facility's methods and measures for complying with the procedures and phytosanitary standards set within the CHTWPCP or the CWPCP and the requirements set out in this document. The completed application must be signed by an authorized official of the facility.

#### **4.2 Facility Registration**

The completed application and manual are to be submitted to a Service Provider for review and approval. The Service Provider will review and compare the facility's manual to the requirements specified in D-03-02 or D-01-05, as well as PI-07 (if applicable) and to this document. An evaluation audit of the facility will also be conducted as outlined in Appendix 1 or Appendix 2 (whichever is applicable). Provided that the manual meets the requirements and the evaluation audit is satisfactory, the Service Provider will sign the application and recommend the facility for registration.

For those facilities applying for registration under the CHTWPCP or the CWPCP and operating under the Service Providers that have not been accredited by the CLSAB, the Service Provider will forward the following documents to the CFIA Area Program Specialist for final approval.

- the completed application for facility registration, signed by both facility and the Service Provider; and
- the signed statement stating that to the best of their knowledge, following a full review of the manual, the operating procedures of the facility conform to the requirements specified in D-03-02, D-01-05, PI-07 (as applicable) and this manual.

The Service Provider will make available to the CFIA a copy of the facility's manual when requested. The CFIA reserves the right to review the manual once approved by the Service Provider and accompany the Service Provider on the evaluation audit.

For those facilities operating under Lumber Grading Agencies accredited by CLSAB for recognition as Service Providers under the CHTWPCP, the Lumber Grading Agency shall submit the following documents to the CLSAB to recommend the facility for approval under the CHTWPCP:

- the application for facility registration signed by both the facility and the Service Provider; and
- the signed statement approved by the CLSAB stating that to the best of their knowledge, following a full review of the manual, the operating procedures of the facility conform to the requirements specified in D-03-02, PI-07 and this manual.

Upon CLSAB's approval, CLSAB will countersign forward the signed application, together with the signed statement confirming that the Operating Procedures are contained in a manual, to a CFIA Area Program Specialist. The CLSAB will make available to the CFIA a copy of the facility's manual when requested. The application shall contain the assigned Agency name and Mill Number, which will appear on the facility's Grade Marks and/or Certificates issued by the facility. The CFIA/CLSAB reserves the right to review the manual once approved by the Service Provider and accompany the Service Provider on the evaluation audit.

Following a recommendation by the Service Provider and final approval by CFIA/CLSAB, a facility registration number will be issued. In the case where a facility has made an application and received approval for registration, the CFIA shall issue a **CA five digit facility registration number**.

In all cases, once approved a facility must maintain a current copy of its manual, and make it available to the Service Provider, the CLSAB where applicable or the CFIA, immediately upon request.

## **5.0 Facility Management Responsibility**

A registered facility is responsible for the employment and training of sufficient and competent staff to carry out the requirements of the applicable program. All staff members responsible for quality control activities or involved in the production of certified treated wood products must be aware of the phytosanitary requirements of the applicable program and be appropriately trained in all functions specific to the program. A manual documenting the facility's quality procedures related to the phytosanitary requirements specified under the CHTWPCP or the CWPCP must be developed and maintained.

## **6.0 Manual Elements Required of All Facilities Registered in the CHTWPCP or CWPCP**

The manual will include the facility's objectives, quality and production processes and interactions of those processes, descriptions of documentation control, the structure of the organization, the facility's common terminology, and the responsibilities of the employees involved with the phytosanitary processes. Facilities applying for registration

under policy D-03-02 or D-01-05 must provide information on the following elements in their manual and comply with the requirements as set out under these policy directives.

### **6.1 Administration**

The manual must provide the facility identification, facility location, mailing address telephone numbers, facsimile numbers, E-Mail address, distribution list, table of contents, version (including original) and date. All pages must be numbered.

### **6.2 Structure of the Organization**

The facility must provide information as to the function and responsibilities of staff members involved in maintaining phytosanitary requirements. An organization flow chart may be a simple means to assist in achieving this requirement.

The quality manual must identify a quality manager. This person will be the official contact for the program and will be responsible for the development all aspects of the program. The facility must designate an alternative quality manager to provide assistance, should the principal quality manager be unavailable.

### **6.3 Training**

The facility must describe the training procedures of staff performing duties related to the phytosanitary requirements of the CHTWPCP or CWPCP, including the specific training elements and the intervals between training and re-training. An example of the training record must be provided. Actual training records must be kept on file at the facility and must be retained for a minimum of 2 years.

### **6.4 Non-Conformances**

The facility must specify the procedures for addressing non-conformances and must include an action plan for dealing with specific processes and activities that fail to comply with any of the specified elements. Actual records of non-conformances and corrective actions must be kept on file at the facility for a minimum of 2 years.

### **6.5 Internal Quality Audits**

The facility may describe any internal quality audits conducted by the facility on a routine basis to ensure that the quality processes and activities are being conducted in a consistent manner as they relate to the elements of the applicable program.

### **6.6 Amendment of the Manual**

Procedures used to amend the manual must be identified. A list of amendments must be maintained and must be included in the manual. The list must identify those receiving copies of amendments, including the Service Provider. The CFIA Area Program Specialist must also be notified when a significant change is made to the facility's operating procedures that may impact on the process.



## **6.7 Identification of Heat Treated Wood Products produced under the CHTWPCP or CWPCP.**

For registered facilities that do not heat treat wood but do handle heat treated wood, the manual must clearly show traceability of heat treated wood back to a certified heat treatment facility. For registered facilities that heat treat wood products, the manual must clearly show traceability of heat treated wood back to a specific treatment chart for any wood heat treated at that facility.

### **6.7.1 Identification of Heat Treated Wood Products for Domestic Movement**

#### **6.7.1.1 Receiving**

The manual must clearly specify a procedure for verifying that heat treated wood products received at the facility meet the specifications identified in Section 2.3 of D-03-02 (CHTWPCP) or in Section 5.1 of D-01-05. Heat Treated wood products from the US must be heat treated to the specification of the American Lumber Standard Committee (ALSC) and must be marked in accordance with the ALSC Heat Treatment requirements. All the wood sources must be mentioned in the manual.

#### **6.7.1.2 Shipping**

The manual must clearly specify a procedure for verifying that heat treated wood products shipped from the facility meet the specifications identified in Section 2.4 of D-03-02 (CHTWPCP) or in Section 5.1 of D-01-05 (CWPCP).

Facilities producing heat treated wood products, which include wood packaging material, pre-fabricated homes or those handling certified heat treated wood products in which the identity of the wood is changed, must assure that the wood products that may be intended for export are traceable to a registered heat treatment facility or specific treatment as applicable and that all products are marked in compliance with the phytosanitary requirements of the importing country.

#### **6.7.1.3 Consolidation of Wood Products**

Facilities consolidating wood products must be registered under the program and must indicate the procedures for the issuance of consolidated heat treatment certificates including, but not limited to, the persons responsible for the issuance of certificates, and the certificate numbering system, etc. The facility must also specify the procedures used in ensuring that consolidated certificates are traceable to approved treatment certificates.

### **6.7.2 Identification of Heat Treated Wood Products (other Than Wood Packaging Material) for Export**

Facilities exporting heat treated wood products (other than Wood Packaging Material) must specify the option(s) used in meeting the conditions identified in Section 2.3 of D-03-02.

### **6.7.3 Identification of ISPM No. 15 Compliant Wood Packaging Material**

Facilities heat treating wood packaging material or facilities producing certified wood packaging material from heat treated wood to the ISPM No. 15 standard must describe the marking method used to identify compliant products in accordance with Section 3.1 of D-01-05. The facility must also provide an example of the wood packaging certification mark format in their manual (see Appendix 1 of D-01-05 or Appendix 2 of D-03-02).

**Note:** *In all cases, for heat treated wood packaging material including dunnage, the ISPM No. 15 Mark must be separate from any other marks (see D-01-05 Appendix 1; D-03-02 Appendix 4).*

### **6.7.4 Identification of Attached Dunnage.**

The facility must specify how attached heat treated dunnage including stringers, spacers, or other attached wood packaging material used to support or secure the export products are marked in compliance with the phytosanitary requirements of the importing country. A heat treatment certificate and/or a phytosanitary certificate may be used where dunnage is attached to the actual wood products and where accepted by the importing country. For dunnage or wood packaging material which is not attached, refer to Section 12.1 of D-01-05.

### **6.8 Segregation of wood**

The facility must specify how treated wood products are segregated from untreated wood products (e.g.: a schematic may be used to assist in achieving this requirement).

### **6.9 Heat Treatment Certificate**

Facilities issuing Heat Treatment Certificates must specify in their manual the procedure for the issuance of heat treatment certificates including the persons responsible for issuance and the numbering system used. Heat Treatment Certificate forms used for the export and domestic movement of heat treated wood products will be provided by the Service Provider to the registered facility. A copy of the HT Certificate form(s) must be included in the facility's manual. Copies of issued heat treatment certificates must be kept on file at the facility for review by the Service Provider or the CFIA for a minimum of 2 years.

### **6.10 Purchasing**

Registered facilities purchasing heat treated wood products must be able to trace their wood products to facilities registered under the CHTWPCP or the CWPCP or if imported from the U.S. the wood product must meet the American Lumber Standard Committee (ALSC) heat treatment standards and must identify these sources in their manual.

## **6.11 Document Control**

The facility must state the retention period for all records and completed forms used by the facility to track activities or procedures related to the CHTWPCP or CWPCP. The documents must be retained for a minimum of 2 years. (i.e.: Purchasing records, training records, audit reports, heat treatment certificates, kiln treatment charts, records of non-conformances, etc.)

## **7.0 Specific Elements for Registered Facilities Heat Treating Wood Products**

While heat treatment operating procedures vary, facilities heat treating wood products must address at least the following additional requirements.

### **7.1 Heat treatment chamber**

A pre-treatment kiln inspection to ensure the kiln is clean and functioning properly before the initial heat treatment is to be conducted.

The manual must specify how the general operating requirements set out in PI-07 are met and maintained. These conditions include air flow rate, operation of fans, wet bulb/dry bulb sensor descriptions and locations, the strategy for changing air flow directions and where applicable, the process for determining initial wood core temperature.

The manual must provide a description of the heat treatment chamber with the location of heat sensors (e.g.: a schematic).

### **7.2 Treatment options**

The facility must identify the phytosanitary heat treatment option(s) selected from PI-07 or provide a recognized heat treatment evaluator's kiln schedule. For the purpose of this document, a recognized heat treatment evaluator is an organization, company or person that has been authorized by the CFIA to conduct a scientific analysis pertaining to the treatment of wood products.

### **7.3 Treatment documentation**

The manual must include the method of recording the recognized heat treatment process referred to in 7.2. The method must demonstrate how the records relate to the specific phytosanitary requirements with respect to minimum time and temperature. A method of recording the heat treatment process must be included. The manual must specify the species to be treated, dimensions of the wood being treated, and the size of stickers.

#### **7.4 Treatment Records**

Each facility shall maintain records that verify each treatment has met the technical specifications outlined in PI-07 or the site specific schedule approved by a CFIA recognized heat treatment evaluator. The facility must state the method of recording and how they confirm the treatment specifications have been met. The facility shall indicate in the manual the type of information that will be maintained. Records are to be kept for a minimum of 2 years after treatment.

#### **7.5 Verification of the Measuring System**

The facility must provide a documented procedure for verifying that the measuring system (temperature sensors) is operating within prescribed standards. Records of measuring system verification must be kept for a minimum of 2 years.

#### **7.6 Final Moisture Content**

For option B, C, D and F in PI-07, a process must be specified in the manual that ensures the final moisture content of the treated wood products complies with the specifications in PI-07 as well as detailing how the registered facility will deal with treatments that have not met the final moisture content.

#### **8.0 Specific elements for Wood Packaging Material.**

##### **8.1 Use of Debarked Wood in the Production of Wood Packaging Materials for Export**

Facilities manufacturing certified wood packaging materials must describe in their manual, the process used in ensuring compliance with the debarking requirement, as specified in Section 6.0 of the D-01-05.

##### **8.2 Specific Elements for Facilities Producing Wood Packaging Kits to be Assembled in a Non-Registered Facility**

Facilities producing wood packaging kits to be assembled in a non-registered facility must specify in their manual the process used in ensuring compliance with the standards prescribed in Section 10.0 of D-01-05.

##### **8.3 Specific Elements for Facilities Applying the Wood Packaging Certification Mark Outside the Registered Facility**

For registered facilities authorized to assemble and stamp wood packaging materials off-site, procedures used in ensuring the compliance with section 11.0 of the D-01-05 must be specified in the manual.

#### **8.4 Special Requirements for wood products originating in regulated areas for quarantine pests**

Facilities moving non-heat treated wood products outside areas that are regulated for specific quarantine pests, or receiving wood products from areas regulated for specific quarantine pests, must comply with domestic movement requirements as outlined in the respective Policy Directives. A list of Plant Protection Policy Directives refer to: <http://www.inspection.gc.ca/english/plaveg/protect/dir/directe.shtml>

Examples of regulated pests:

(Asian Long Horned Beetle, Brown Spruce Longhorn Beetle, Emerald Ash Borer, Gypsy Moth), etc)

#### **8.5 Specific Elements for Facilities Repairing Previously Certified Wood Packaging Material**

Facilities repairing wood packaging material must specify in their manual the process used in ensuring compliance with the standards prescribed in Section 8.0 of D-01-05.

#### **8.6 Specific Elements for Facilities Re-manufacturing Previously Certified Wood Packaging Material**

Facilities re-manufacturing wood packaging material must specify in their manual the process used in ensuring compliance with the standards prescribed in Section 9.0 of D-01-05.

### **9.0 Registration Approval Process**

#### **9.1 Quality Manual Review**

A review of the Facility Quality Manual will be conducted to verify that the facility meets the requirements prescribed in D-03-02 or D-01-05, PI-07, and this document and is capable of operating within the scope of its manual.

#### **9.2 Evaluation Audit**

In order to complete the registration process, new applicants will require an evaluation audit prior to registration. The audit verifies that a facility is capable of meeting the requirements prescribed in D-03-02 or D-01-05, as well as PI-07 and this document, and can operate in compliance with its manual.

An evaluation audit may be necessary to confirm that a suspended facility has adequately addressed the necessary corrective actions to avoid repeated non-conformances in the future.

The evaluation audit will be done by the Service Provider. The CFIA and the CLSAB, where applicable, reserve the right to participate in the evaluation audit. If the facility is not able to perform within the specifications of the approved manual or the requirements specified in D-03-02 or D-01-05, as well as PI-07 or this document, the facility will have to review its procedures or manual to meet the specifications required by the Service Provider and the CFIA. The corrective actions must be completed to the satisfaction of the Service Provider, and the CFIA (and/or the CLSAB where applicable) for the facility to be approved for registration.

### **9.3 Verification Audits**

Verification audits will be conducted, as outlined in Appendix 1 or Appendix 2, (whichever is applicable) to ensure that the facility is performing within the phytosanitary requirements detailed in D-03-02 or D-01-05, as well as PI-07 and this document. The audit will focus on key areas that are most critical for the delivery of compliant heat treated wood products. The audit will determine if the manual, the procedures and work instructions of the facility are fully implemented and conform to D-01-05 or D-03-02.

Should non-conformances be identified by the Service Provider (see Section 10.0), the Service Provider may increase the frequency of audits to verify that all corrective actions have been completed to its satisfaction. The facility must be available for audits by the Service Provider during normal working hours within 24-48 hours notice.

### **10.0 Non-Conformance**

The Service Provider shall require a registered facility, to take corrective action on any non-conformance identified at any time of registration on either the CHTWPCP or CWPCP. These corrective actions shall be monitored by the Service Provider.

Where the Service Provider finds that a registered facility is not in conformance, the Service Provider may increase the frequency of inspection, until satisfactory corrective actions are completed.

Upon the identification of a non-conformance, the Service Provider will provide a written report to the registered facility identifying the non-conformance, corrective actions necessary and the need for follow-up inspections.

Where repetitive non-conformances are identified at a facility or where a non-conformance jeopardizes the integrity of the CHTWPCP or the CWPCP, the facility registration may be suspended or the facility registration may be revoked by the CFIA, following consultation with the Service Provider. The CFIA shall notify the registered facility in writing of this action with a copy to the CLSAB where applicable.

Non-conformances may be major, minor or in the form of an observation. For definitions and examples of non-conformances, refer to Appendix 3.

### **10.1 Minor Non-Conformances**

Notification of minor non-conformances identified by the Service Provider, including a description of the non-conformance and the required corrective action plan, shall be made available to the registered facility by the Service Provider within five (5) working days. The Service Provider will follow-up on the corrective actions within a reasonable time frame, not exceeding one (1) month from notification.

Information regarding the recorded minor non-conformances, the planned corrective actions and follow-up confirmation that the corrective actions have been completed shall be provided annually by the Service Provider to the CFIA or to the CLSAB where applicable.

### **10.2 Major Non-Conformances**

Notification of major non-conformances, including a description of the non-conformance and the required corrective action shall be provided by the Service Provider to the registered facility, to CFIA, and to the CLSAB where applicable, within three (3) working days of the audit. Depending on the nature of the non-conformance and following recommendation by the Service Provider, and the CLSAB where applicable, the CFIA may apply an interim suspension.

The Service Provider will request the facility to take corrective action within a time frame appropriate to address the non-conformance but not to exceed 10 working days.

The Service Provider will follow-up on corrective actions taken by the facility as often as required to verify full compliance within ten (10) working days of the corrective action due date

The Service Provider will confirm to the CFIA, and to the CLSAB where applicable, that the required corrective action has been taken, or has not been taken, within three (3) working days of the follow-up visit intended to verify the corrective action.

Where there is a total failure of the facility's quality management system, the facility will be immediately cancelled from the program and the facility will be required to re-submit an application for registration to the program. If approved, a new facility registration number will be issued.

Service Provider inspection reports must be completed, dated and kept on file at the facility and by the Service Provider's office for review during normal business hours by the CFIA or the CLSAB where applicable, at its discretion.



### **10.3 Observations**

Where non-phytosanitary issues (eg. missing page numbers, appendices not numbered and other administrative elements) arise during a verification audit, they will be recorded as Observations and should be addressed in a time frame mutually agreed upon by the Service Provider and CFIA. Where observations have been recorded and not addressed by the mutually agreed upon time frame, they will be elevated and recorded as minor non-conformances.

### **11.0 Enforcement**

#### **11.1 Suspension of Registration**

Where repetitive major non-conformances compromise the integrity of CHTWPCP or the CWPCP, a facility will be suspended by the CFIA in consultation with the Service Provider or the CLSAB where applicable.

In cases of suspension, the terms and duration of the suspension will be determined following consultation between the Service Provider, the CLSAB where applicable, and the CFIA.

During a suspension period, the registered facility will not be permitted to apply the CHTWPCP recognized certification mark for heat treated wood products and will not be permitted to apply the international recognized certification mark for heat treated wood packaging material as outlined in the CHTWPCP or the CWPCP. Failure to comply will result in immediate cancellation of the facility's registration.

If the facility's corrective actions and quality system are deemed sufficient by the Service Provider and the CLSAB where applicable, the CFIA will rescind the suspension and the Service Provider will assign the facility a new audit frequency. Once the facility has demonstrated on-going compliance with the requirements of the CHTWPCP or the CWPCP to the Service Provider's satisfaction, the Service Provider will reduce the frequency of inspection to that described in Appendix 1 or 2 (whichever is applicable).

#### **11.2 Cancellation of Registration**

A facility registration may be cancelled where the facility fails to address the non-conformances identified at the time of suspension, or where the facility voluntarily withdraws from the CWPCP or the CHTWPCP, or on recommendation from the Service Provider, the CLSAB where applicable, or if the facility has failed to pay the appropriate CFIA fees.

Upon cancellation of Registration, the facility's name and number shall be removed from the CFIA list of approved facilities located on the CFIA website. Under the terms of the Application for Registration under the CHTWPCP or CWPCP, if the status of the facility is cancelled, the facility must immediately terminate all usage of the CHTWPCP Recognized Certification Mark and the ISPM No.15 Recognized Mark for heat treated wood packaging material.



A cancelled wood packaging facility or treatment facility may re-apply for registration once it has completed all corrective actions necessary to the satisfaction of the CFIA, the CLSAB where applicable, and/ or Service Provider to prevent a recurrence of the non-conformance(s). The facility must re-submit a manual and a detailed report of corrective actions taken. The Service Provider, in cooperation with the CFIA, and with the CLSAB where applicable, will conduct a re-evaluation of the facility to determine if the necessary corrective actions were sufficient. A new inspection frequency shall be assigned by the Service Provider to the facility. Once the facility has demonstrated on-going compliance with the standards of the CHTWPCP or the CWPCP satisfactory to CFIA, the CLSAB where applicable, and/or Service Provider, the facility shall return to the normal inspection frequency.

## **12.0 CFIA System Audits of the Program**

The CFIA will conduct audits of facilities and Service Providers as described in Appendix 1 or Appendix 2 but also reserves the right to audit facilities whenever warranted during normal working hours to verify that the system for production of certified heat treated wood products (including wood packaging) is consistently maintaining the phytosanitary requirements of importing countries and is ensuring that the overall conditions of the CHTWPCP and CWPCP are being met.

**Appendix 1 Activities and Audits on Facilities monitored by Service Providers  
(other than those CLSAB Accredited Grading Agencies identified as  
Service Providers under the CHTWPCP or the CWPCP. )**

	<b>Type of Facilities</b>
<b>Activities</b>	<b>Facility with a Heat Treatment Chamber (Primary Treatment Facility) Exporters, Shippers, Brokers Consolidating Treated Materials, Secondary Manufacturers Using Heat Treated Products (Including Wood Packaging Facilities)</b>
<b>1. Application for registration under the CHTWPCP, CWPCP and Submission of the Manual</b>	Prior to registration
<b>2. Evaluation Audit conducted by Service Provider in cooperation with the CFIA</b>	To be conducted prior to registration or as a result of suspension from the program. The CFIA reserves the right to participate on the evaluation audit of the facility (minimum of 3 per area or up to 10%, annually)
<b>3. Issuance of facility registration number by CFIA</b>	Upon approval of facility's manual and an evaluation audit that attests that the facility is in compliance.
<b>4. Verification Audit conducted by the Service Provider</b>	A minimum of 1 per quarter beginning on the date of registration within the first 12 months of registration, or re-registration following suspension. After the 12 month probation period, for those facilities with heat treating kilns, a minimum of 4/ year and for those facilities not heat treating a minimum of 2/year on a calendar year basis.
<b>5. Follow-up Audit (Response to Non-conformances)</b>	At any time until non-conformances are corrected to the satisfaction of the Service Provider and/or CFIA
<b>6. System Audits conducted by CFIA</b>	A representative sample (up to 33%) of registered facilities on an annual basis

**Appendix 2 Activities and Audits on Facilities monitored by CLSAB Accredited Grading Agencies identified as Service Providers under the CHTWPCP**

<b>1. Application for registration under the CHTWPCP &amp; Submission of the Manual</b>	This must be submitted prior to registration.
<b>2. Evaluation Audit conducted by a CLSAB accredited Lumber Grading Agency in cooperation with the CFIA</b>	To be conducted prior to registration or as a result of suspension from the program. The CFIA and/or the CLSAB reserve the right to participate on the evaluation audit of the facility. Where a CLSAB/CFIA evaluation audit is to be conducted, the Lumber Grading Agency will coordinate the evaluation audit with the CFIA and the CLSAB.
<b>3. Issuance of facility registration number by CFIA</b>	Upon approval of facility's manual and recommendation received by CLSAB.
<b>4. Verification Audit conducted by the CLSAB accredited Lumber Grading Agency</b>	CLSAB Regulations –Clause 3.5.16 and 3.5.16.1 shall govern frequency of audits. (For those agencies required to meet the ALS requirements, a minimum of 12 visits will be conducted on an annual basis.)
<b>5. Follow-up audit (response to non-conformances)</b>	At any time, until the non-conformances have been corrected to the satisfaction of the accredited Lumber Grading Agency, the CLSAB, and/or the CFIA.
<b>6. Systems Audits conducted by CFIA in cooperation with the CLSAB on the individual Grading Agencies</b>	An annual audit of each Grading Agency and a random sample (up to 10%) of the lumber grading agency's registered facilities.  <i>*Note: CFIA/CLSAB shall advise the Lumber Grading agencies and facilities it intends to audit in order to maximize efficiencies and effectiveness of the audit program.</i>

**Appendix 3 Examples of non-conformances at the facility level****OBSERVATIONS**

**Audit findings that reveal an issue that does not affect the phytosanitary requirements of the program will be deemed as observations. Remedial action must be taken within the mutually agreed upon time frame or the observation will be changed to a minor non-conformance.**

1. Manual page number missing
2. Manual appendices are not labelled or numbered
3. Facility record-keeping is inadequate but records essential to the integrity of the phytosanitary standard (e.g. treatment records are complete, traceability records maintained).
4. Facility's organizational chart is not updated when staff changes are made

**MINOR NON-CONFORMANCES**

**Audit findings that reveal an isolated incident of non-conformance which has no direct impact on the integrity of the product and that remedial action can be taken within a time period defined by the inspector. Corrective action must be carried out to the satisfaction of CFIA or participation of the facility may be suspended. More than 5 minor non-conformances = a major non-conformance**

1. Facility operating with minor changes to quality processes that have not been approved by CFIA or a CFIA Service Provider.
2. Facility procedures for documentation or certificate issuances have not been followed or have been poorly followed. Procedures are unclear.
3. Facility employee involved with implementing the quality procedures (e.g. kiln operator, certificate signing authority, employees responsible for product separation, etc.) is unaware of the phytosanitary specifications pertaining to activities performed by that employee.
4. Segregation or identification of treated and untreated wood is inadequate, but does not affect the integrity of products ready for export.
5. Staff training has not been completed or records of training have not been maintained.
6. Registered facility has failed to maintain records of audits.
7. Items identified as observations on previous audit are still left unaddressed.

## MAJOR NON-CONFORMANCES

**Audit findings that reveal that the integrity of this program may be compromised. Certificates must not be issued. The registered facility may be suspended from this program**

1. Facility operating with significant changes to kiln operating conditions that have not been approved by CFIA or a CFIA Service Provider.
2. Corrective actions identified for non-conformance from previous audits have not been implemented
3. Regulated wood products destined to off-shore markets have not met the phytosanitary standard (i.e. 56°/30 minutes). (e.g. the registered facility fails to meet the treatment specifications in the approved manual, etc.)
4. Exported material or material designated or consigned for export fails to meet the phytosanitary import requirements of the importing country.
5. The facility has improperly issued certificates (e.g. failed to meet the specifications on the certificate or the certificate was issued by an unauthorized person, etc.)
6. Segregation of treated and untreated lots has not been maintained.
7. Records are significantly incomplete or do not allow CFIA or the Service Provider to conduct traceback of products exported (e.g. treatment records are missing, incomplete, etc. or export certificates not maintained, etc.)
8. A consolidated shipment has been constructed from wood products that have not been treated in accordance with the standards or has been obtained from a facility not registered.
9. Employees involved with implementing the quality procedures are not sufficiently trained