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	<b>EFFECTIVE DATE</b>  <b>January 2, 2004 (3<sup>rd</sup> Revision)</b>
<b>Title/titre: Entry Requirements for Wood Packaging Materials Produced in All Areas Other Than the United States</b>	

*Our File*  
3520-7-6 / 3525-1111

## **SUBJECT**

This directive provides the requirements for the entry for all wood packaging materials including dunnage, pallets or crating made from non-manufactured wood entering Canada from all areas except the continental United States. It also outlines the disposal or processing procedures for all regulated wood packaging materials not meeting the entry requirement.

*This revision has been undertaken to update Canadian entry requirements following the completion of a Canadian pest risk analysis related to the importation of wood packaging materials and dunnage. It also reflects the regulatory guidelines established in International Standard for Phytosanitary Measures #15: Guidelines for Regulating Wood packaging materials Material in International Trade”*

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## Review

This directive will be reviewed every five years, unless otherwise needed. The next date of review is January 2, 2009. The contact for this directive is Joanne Rousson. For further information or clarification, please contact the Forestry Section.

## Endorsement

Approved by:

<hr/> <p>Director Plant Health Division</p>
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## Amendment Record

Amendments to this directive will be dated and distributed as outlined in the distribution below.

## Distribution

1. Directive mail list (Regions, PHRA, USDA)
2. Provincial Government, Industry (via Areas)
3. National Industry Organizations (determined by Author)
4. Internet

## Introduction

The risk represented by wood packaging materials and dunnage varies depending on the quality, conditioning and degree of finishing of the wood. The better the quality of wood used, the less likely it is that the wood packaging materials may be infested with serious pests. Many exotic plant pests have been intercepted on wood dunnage, pallets, crating or other wood packaging materials. Examples of plant quarantine pests intercepted include: *Anoplophora chinensis*, *Anoplophora glabripennis*, *Ips typographus*, *Hylastes ater*, *Monochamus sp*, *Trichoferus campestris* and others. The introduction of the Asian long horned beetle (*Anoplophora glabripennis*), pine shoot beetle (*Tomicus piniperda*), emerald ash borer (*Agrilus planipennis*) and other exotic pests now established in parts of North America can be linked to international shipments containing wood packaging materials.

In March 2002, the Interim Commission Phytosanitary Measures of the International Plant Protection Convention endorsed a standard prescribing uniform regulatory control of wood

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packaging materials moving in international commerce. This document titled: “*ISPM #15, Guidelines for Regulating Wood Packaging Material in International Trade*” recognizes the inherent pest risks associated with the international movement of untreated wood packaging materials. Although this standard does not obligate countries to establish regulatory controls, the guideline represents a mechanism by which any country may establish regulatory controls in a manner that is internationally harmonized and transparent. This Canadian import policy reflects the guidelines established in *ISPM #15*.

This policy does not regulate wood packaging materials originating in the US. As prescribed in *ISPM#15*, Canada has established bilateral phytosanitary measures with the United States. Additionally, existing phytosanitary import measures applying to forest products produced in the US provides sufficient phytosanitary protection to Canada.

Scope            This directive is for use by Canadian importers, Canadian customs brokers, CFIA inspectors, Customs & Revenue Canada, foreign exporters and national plant protection organizations.

References       Department of the Secretary of State of Canada. *The Canadian Style: A Guide to Writing and Editing*. Toronto, 1993.  
*ISPM #15, Guidelines for Regulating Wood Packaging Material in International Trade*. Rome, 2002, FAO.  
Canadian Food Inspection Agency. *D-98-10, Import requirements for wood dunnage, pallets, crating or other wood packaging materials materials originating in China and Hong Kong special administrative region*, Ottawa, 2000  
Canadian Food Inspection Agency. *D-02-12, Import requirements of non-manufactured wood and other non-propagative wood products, except solid wood packaging material, from all areas other than the continental United States*, Ottawa, 2003  
Canadian Food Inspection Agency. *D-03-02, Canadian Heat Treated Wood Products Certification Program (CHTWPCP) for export*, Ottawa, 2003

**This directive supersedes D-98-08 (2<sup>nd</sup> Revision), dated April 10, 2002 and D-98-10 (3<sup>rd</sup> Revision), dated January 24<sup>th</sup>, 2002.**

**Note: To allow importers and international exporters sufficient time to meet the changes established in this policy, this revision shall not be enacted until January 2<sup>nd</sup>. 2004. Until such time as this policy comes into effect directives D-98-08 (2<sup>nd</sup> Revision), dated April 10<sup>th</sup>, 2002 and D-98-10 (3<sup>rd</sup> Revision), dated January 24<sup>th</sup>, 2002 remain in effect**

**The requirements for the importation of other forest products (including**

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**lumber, decorative wood items, etc.) are provided in policy directive D-02-12.**

### Definitions, Abbreviations and Acronyms

All definitions contained within the *Plant Protection Act* and *Plant Protection Regulations*; the North American Plant Protection Organization, Glossary of Phytosanitary Terms, August 15, 1999; within the International Standards For Phytosanitary Measures, Glossary of Phytosanitary Terms, ISPM, Pub. No. 5, 1999 and within Amendments to the Glossary of Phytosanitary Terms, October 31, 2000 are included in this document.

<b>Bark</b>	The external layer of a woody plant not including the vascular cambium which has the potential to harbour pests.
<b>Bark-free wood</b>	Wood from which all bark excluding the vascular cambium, ingrown bark around knots, and bark pockets between rings of annual growth has been removed.
<b>CFIA</b>	Canadian Food Inspection Agency.
<b>Commodity</b>	A type of plant, plant product, or other article being moved for trade or other purpose.
<b>De-barking</b>	Removal of bark from round wood (debarking does not necessarily make the wood bark-free).
<b>Designated facility</b>	A facility officially approved by the CFIA to perform activities stated in this policy.
<b>Dunnage</b>	Wood packaging materials material used to secure or support a commodity but which does not remain associated with the commodity.
<b>Heat Treatment</b>	The process in which a commodity is heated until it reaches a minimum temperature for a minimum period of time according to an officially recognized technical specification.
<b>Kiln-drying</b>	A process in which wood is dried in a closed chamber using heat and/or humidity control to achieve a required moisture content.
<b>Manufactured wood</b>	Articles comprised wholly of wood-based products such as plywood, particle board, oriented strand board, veneer, wood wool etc., which have been created using glue, heat and pressure or a combination thereof.

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<b>NPPO</b>	National Plant Protection Organization.
<b>National Plant Protection Organization</b>	Official service established by a government to discharge the functions specified by the International Plant Protection Convention.
<b>Pest risk analysis</b>	The process of evaluating biological or other scientific and economic evidence to determine whether a pest should be regulated and the strength of any phytosanitary measures to be taken against it.
<b>Raw wood</b>	Wood which has not undergone processing or treatment.
<b>Round wood</b>	Wood not sawn longitudinally, carrying its natural rounded surface, with or without bark.
<b>Wood chips</b>	Untreated, raw wood fragments broken or shredded from logs or branches.
<b>Wood packaging material</b>	Wood or wood products (excluding paper products) used in supporting, protecting or carrying a commodity (includes dunnage).
<b>Wood packing</b>	Wood chips, sawdust or other processed wood product used to stabilize a commodity.

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## 1.0 General Requirements

### 1.1 Legislative Authority

*The Plant Protection Act, S.C. 1990, c 22*

*The Plant Protection Regulations, S.O.R./95-212*

*The Plant Protection Cost Recovery Fees Order, S.O.R./98-161*

*Agriculture and Agri-Food Administrative Monetary Penalties Act ( 1995, c. 40 )*

*Agriculture and Agri-Food Administrative Monetary Penalties Regulations (SOR/2000-187)*

### 1.2 Fees

The CFIA is charging fees in accordance with the *Canadian Food Inspection Agency Fees Notice*. For information regarding fees associated with imported products, please contact the Import Service Centres (ISC) at the following phone numbers: Eastern ISC 1-877-493-0468; Central ISC 1-800-835-4486; Western ISC 1-888-732-6222. Anyone requiring other information regarding fees may contact any local CFIA office or visit our website at [www.inspection.gc.ca](http://www.inspection.gc.ca).

### 1.3 Regulated Pests

Numerous. The following are examples of quarantine pests regulated by Canada:

#### Insects

Asian longhorned beetle (*Anaplophora glaberpennis*)

Bark beetles (*Ips typographus*, *Hylastes ater*, *Tomicus piniperda*)

Boring beetles ( *Callipogon relictus*, *Tetropium castaneum*, *Tetropium fuscum*,  
*Trichoferus campestris*, *Monochamus alternatus*, *Monochamus* sp.)

Gypsy moth (*Lymantria dispar*, Asian biotype)

Leopard moth (*Zeuzera pyrina*)

Mulberry whit-spotted longicorn (*Anaplophora chinensis*)

Nun moth (*Lymantria monacha*)

Rosy gypsy moth (*Lymatria mathura*)

Wood boring wasps (*Sirex noctilio*)

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## Pathogens

Watermark disease of willow (*Erwinia salicis*)  
Bacterial canker of poplar (*Xanthomonas populi*)  
An unnamed disease affecting alder in Europe (*Phytophthora* sp.)  
Sudden Oak Death (*Phytophthora ramorum*)  
Dutch Elm Disease (*Ophiostoma ulmi*, *O. novo-ulmi*)

Any other pest associated with wood packaging materials listed in Canada's list of regulated pests. Canada's list of regulated pests may be obtained on the world wide web at: [www.inspection.gc.ca/english/plaveg/protect/listpespare.shtml](http://www.inspection.gc.ca/english/plaveg/protect/listpespare.shtml)

### 1.4 Regulated Commodities

Wood packaging materials of all species that are not manufactured, including dunnage, pallets, spacers, bearers, crating, etc.

**Note: wood packaging materials used for the transport of lumber are also regulated by this policy. However, logs, wood with bark attached, lumber, wood chips, bark chips, bamboo products, decorative wood items, cones without seed and other forest product imports are regulated by policy directive D-02-12.**

### 1.5 Commodities Exempt

All wood packaging materials constructed entirely from manufactured wood including: dunnage, pallets, spacers, bearers, crating, etc. All wood packaging materials constructed of wood of less than 6mm in thickness or from peeler cores.

Wood packing constructed from particles such as: sawdust, wood shavings, wood wool, etc.

### 1.6 Regulated Areas

All countries other than the continental United States

## 2.0 Specific Requirements

### 2.1 Entry of Untreated Non-manufactured Wood packaging materials

The importation or movement in-transit through Canada of untreated non-manufactured wood packaging materials from any area of world excluding the United States is



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prohibited.

Untreated non-manufactured wood packaging materials originating from areas other than the United States but transiting through the United States and entering Canada is prohibited.

## **2.2 Entry of Treated Non-manufactured Wood packaging materials**

A Permit to Import is not required.

A Phytosanitary Certificate is not required.

All non-manufactured wood packaging materials (as defined in section 1.4) may enter Canada provided the material has been officially treated by one of the methods specified in Appendix 1. A logo or mark, officially endorsed by the NPPO of the country from which the wood packaging materials originates must be permanently affixed to each unit of wood packaging materials. More details on the mark are provided in Appendix 2.

Replacement wood used in reconditioned wood packaging materials must be treated prior to export by a facility endorsed by the NPPO of the exporting country. The official mark of the facility conducting the treatment of the replacement wood must be affixed to the wood packaging materials.

The NPPO of the country from which the wood packaging materials originates must have a certification system in place for the approval and monitoring of facilities producing treated wood packaging materials. This certification system must ensure that the wood packaging materials or wood used in re-conditioned wood packaging materials are treated in accordance with one of the methods specified in Appendix 1. Facilities must be approved by the NPPO to affix a mark to the treated wood packaging materials. The system of marking must conform to the specifications laid out in Appendix 2. The NPPO must arrange to provide to CFIA on regular basis an updated list of facilities endorsed by the NPPO (e.g. a NPPO may arrange to provide a web-site address where lists are maintained).

Importers may determine eligible shippers of wood packaging materials by contacting a local office of the CFIA.

The CFIA, until June 1, 2004, may permit the entry of wood packaging materials from countries that do not have a certification system in place. The wood packaging materials must have been treated in accordance with the specifications in Appendix 1 and must be accompanied by a document officially endorsed by the NPPO of the country producing the wood packaging materials. The document must identify the treatment that has been applied

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to the wood packaging materials, the date treatment was applied, the signature and date of the certifying official of the NPPO and the nature of the product accompanying the wood packaging materials. Arrangements regarding the types of certificates to be used and the type of endorsement to be applied must be made available to the CFIA prior to any wood packaging materials certified in this manner entering Canada.

### **3.0 Inspection Requirements**

CFIA inspection staff will inspect imports containing wood packaging materials at a rate specified within Area operational work plans. Inspectors will verify that wood packaging materials are marked appropriately or accompanied by appropriate certification documents and that the wood packaging material does not contain any pests or signs of living pests.

### **4.0 Non Compliance**

Any regulated material found to be in non-compliance with the import requirements specified above will be ordered removed from Canada.

However, during a transition period, which ends June 1, 2004, a CFIA inspector may permit non-compliant wood packaging materials to be moved to a facility that safely disposes or process the wood packaging materials in accordance with the conditions specified in Appendix 3. The CFIA must determine that this movement of non-compliant wood packaging materials is both practically feasible and does not constitute a biological risk to introducing a pest to Canada. Any costs incurred in the disposition of non-compliant wood packaging materials are the responsibility of the person or entity in care and control of the non-compliant wood packaging materials at the time of entry to Canada (including port or berthing facilities receiving untreated dunnage). The facility disposing or processing the non-compliant wood packaging materials must have completed an "Application for Participation in the Non-Compliant Wood packaging materials Disposal or Processing Program" (Appendix 4) and this application must have been approved by an inspector of the CFIA prior to the non-compliant wood packaging materials being granted entry to Canada.

After June 1, 2004, wood packaging materials found to be non-compliant will be ordered returned to origin. Costs incurred in returning the wood packaging materials to origin are the responsibility of the person of the person or entity in care and control of the non-compliant wood packaging materials at the time of entry to Canada (including port or berthing facilities receiving untreated dunnage).

Any movement of non-compliant wood packaging materials must be authorized by the CFIA on movement certificates issued to the individual having care and control of the non-compliant item. Movement certificates shall specify the specific conditions by which

the wood packaging materials may be moved.

## **5.0 List of Appendices**

Appendix 1 - Approved Methods of Treatment

Appendix 2 - Systems Acceptable for the Marking of Treated Wood packaging materials

Appendix 3 - Methods For The Disposal or Processing of Non-compliant Wood packaging materials

Appendix 4 - Application for Participation in the Non- Compliant Wood packaging materials Disposal and Processing Program

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**APPENDIX 1**
**APPROVED METHODS OF TREATMENT**
**1. Heat Treatment**

All wood packaging materials material must be heated to a minimum internal wood core temperature of 56°C for 30 minutes. Kiln-drying, chemical pressure impregnation, or other treatments may be used as a means of achieving heat treatment provided that the above temperature and time requirements are met.

OR

**2. Fumigation**

Wood may be fumigated with **methyl bromide** at normal atmospheric pressure at the following rates:

Temperature	Dosage rate	Minimum concentration (g/m <sup>3</sup> )			
		0.5hrs.	2hrs.	4hrs.	16hrs.
21° C or above	48	36	24	17	14
16° C or above	56	42	28	20	17
11° C or above	64	48	32	22	19

OR

**3. Other Treatment Methods**

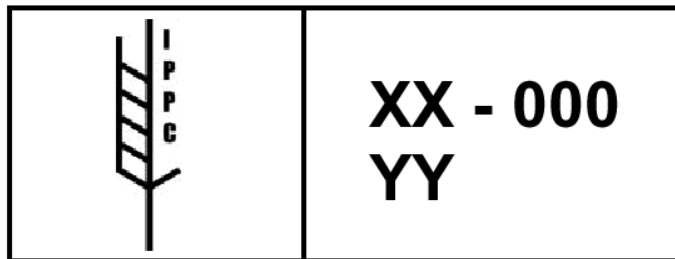
The CFIA may approve other treatment measures, if it can be proven that such measures are effective in minimizing the risk of quarantine pests associated with untreated wood packaging materials. Importers should contact a local office of the CFIA to enquire about the use of other treatments. All costs associated with the verification that an alternative treatment method is effective in precluding pest movement into Canada, must be borne by the importer.

## APPENDIX 2

**SYSTEMS ACCEPTABLE FOR THE MARKING OF  
TREATED Wood packaging materials**

Wood packaging materials that has been treated by one of the methods specified in Appendix 1 and in a manner that is officially endorsed by the NPPO of the country from which the wood packaging materials originates may be permitted entry into Canada provided the wood packaging materials material is marked as follows:

1. The mark must at minimum include:
  - the IPPC symbol for treated wood packaging materials (as per Annex II of the “*International Standard for Phytosanitary Measures #15: Guidelines for Regulating Wood packaging materials Material in International Trade*”) as reproduced here.



- Any other marking system provided by the NPPO of the country in which the wood packaging materials is produced, **provided a template of the officially endorsed symbol has been provided to the CFIA prior to any shipments being received.**
2. NPPOs or producers may at their discretion add control numbers or other information used for identifying specific lots. Other information may also be included provided it is not confusing, misleading, or deceptive.
  3. Markings should be:
    - legible
    - permanent and not transferable (tags are not allowed)
    - placed in a visible location on at least two opposite sides of the article being certified.
  4. The colors: red or orange should be avoided.
  5. Reconditioned wood packaging materials must be treated and contain the marks of the facility approved to perform the re-treatment.



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**APPENDIX 3****METHODS FOR THE DISPOSAL OR PROCESSING OF NON-COMPLIANT Wood packaging materials**

## 1. Methods for the Disposal or Processing of Non-compliant Wood packaging materials

CFIA may permit the movement, disposal or processing of non-compliant wood packaging materials provided that facilities capable of meeting the standards prescribed here exist to conduct the disposal or processing. All costs incurred in the certification, inspection, monitoring, transport, disposal and/or processing of wood packaging materials must be absorbed by the person in care and control of the wood packaging materials at the time of entry into Canada. The material must be disposed of or processed in a manner that prevents the entry or introduction of pests into Canada. The following methods may be used to dispose or process non-compliant wood packaging materials:

- incineration or;
- deep burial to a depth of no less than 3 metres that will not be disturbed, (non-compliant wood packaging materials must be immediately covered with soil/dirt) or,
- treatment by heat treatment, kiln drying or fumigation as specified in Appendix 2 or;
- processing to produce wood by-products such as wood dust, wood mulch, wood fuel, paper finish mulch, recycled fibre wood and oriented strand board or;
- other methods as approved by CFIA.

## 2. Storage of Non-Compliant Wood packaging materials While Awaiting Disposal or Processing

Any non-compliant wood packaging materials must be at all times stored in a closed container that is effective in ensuring that pests may not be allowed to enter the environment. Storage areas of non-compliant wood packaging materials must be isolated from other domestic wood commodities, material that has already undergone processing and adjacent forested lands by no less than 30 metres.

## 3. Transportation of Non-compliant Wood packaging materials from Point of Entry to the Site of Disposal or Processing

Regardless of the process (described in section 1 of Appendix 3) by which non-compliant

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wood packaging materials is to be handled, the material may only be moved, by a transporter that is approved by CFIA as specified on a Movement Certificate issued to the person in care and control of the non-compliant wood packaging materials. The wood must be moved in a closed container directly to the site at which disposal or processing is going to take place.

#### 4. Specific Requirements for Disposal or Processing

Facilities storing, disposing or processing non-compliant wood packaging materials by the methods described in Section 1 of Appendix 3 must comply with the following specifications:

- The designated facility undertaking disposal or processing must have completed an Application for Participation as specified in Appendix 4. This application, if accepted by CFIA, shall be signed by an inspector confirming the facility's participation in the program. Until the facility is approved, non-compliant imported wood packaging materials may not be moved to the facility.
- Designated facilities must undertake all disposal or processing in a Canadian establishment designated on the Application for Participation
- Designated facilities must afford CFIA staff full co-operation for the purposes of carrying out audits, inspection, sample collection, product inspections, interviews of staff, etc.
- A designated facility must have in its employ sufficient competent staff to undertake the requirements specified here and in the Application for Participation.
- CFIA will only permit deep burial, if the non-compliant wood packaging materials material is buried at a minimum depth of 3 metres below the surface of the ground. The wood must be buried at a site where the re-excavation of the material will not occur and where any covenants required on land title to ensure that re-excavation does not occur can be completed. Wood must not be left exposed within the burial pit.
- Any wood packaging materials that is not processed including secondary products produced during processing must be disposed of in the manner approved by a CFIA inspector as specified in the Application for Participation in the Non-compliant Wood packaging materials Disposal and Processing Program.
- The period in which disposal or processing may be carried out may be extended by a CFIA inspector, provided the designated facility has additional mechanisms to mitigate the distribution of pests or there exists environmental conditions which



preclude the distribution of pests (e.g. periods may be extended during the winter in some parts of the country). A CFIA inspector will provide in writing the period by which disposal or processing must be completed.

- Designated facilities must immediately notify a local CFIA office upon the detection of any unusual pests on non-compliant wood packaging materials at the disposal or processing facility.
- The designated facility must maintain records pertaining to the handling, storage, processing or disposal of non-compliant wood packaging for a minimum of 2 years.

**APPENDIX 4**

**APPLICATION FOR PARTICIPATION AS A DESIGNATED FACILITY IN THE NON-COMPLIANT Wood packaging materials DISPOSAL AND PROCESSING PROGRAM**

Name of Facility Undertaking Processing or Disposal:	
Name of Principle Contact Person	Title:

Address:	
City:	Province:

Telephone:	Facsimile:	E-mail:
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1. Type of Processing or Disposal (check)	Deep burial to a minimum of 3 m.	<input type="checkbox"/>
	Chipping not exceeding 2.5 cm <sup>2</sup>	<input type="checkbox"/>
	Production of wood fuel	<input type="checkbox"/>
	Production of laminated or heat treated products (e.g. wafer board, oriented strand board, etc.)	<input type="checkbox"/>
	Heat treatment (as per the conditions outlined in D-03-02, <i>Canadian Heat Treated Wood Products Certification Program (CHTWPCP) for export</i> )	<input type="checkbox"/>
Other (describe process):		

2. Areas where wood packaging materials is stored prior to disposal or processing:	Storage areas are closed and preclude pest escape	<input type="checkbox"/>
	Storage areas are isolated from forested lands or other wood products	<input type="checkbox"/>

3. Indicate time required between receipt of non-compliant wood packaging materials and time to process:	<input type="checkbox"/>
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4. Indicate what components of the non-compliant wood are not processed and how they are to be disposed off:

**Conditions for the Disposal or Processing of Non-compliant Wood packaging materials:**

1. All non-compliant wood packaging materials will be disposed or processed in the manner described above within the time frame provided above.
2. Any non-compliant wood packaging materials that is not used for processing as described above, will be disposed in the manner described in 4 above.
3. The person or facility indicated above will keep records of all shipments of non-compliant wood packaging materials received (e.g. shipping invoices, copies of movement certificates, etc.) and records of when these shipments were processed, treated or disposed off. Records will be maintained for a minimum of 2 years.
4. Should a pest be found on non-compliant wood packaging materials or in the facility, the CFIA will be immediately notified.

I, \_\_\_\_\_ the owner/person in possession, care, or control of the above named facility have read and understood all the conditions and obligations stated herein by which I may dispose or treat non-compliant wood packaging materials (ship’s dunnage, crating or other wood commodities) in accordance with the Non-Compliant Wood Packaging Materials Disposal and Processing Program.

Further, I am and shall be responsible for and shall indemnify and save harmless Her Majesty the Queen in Right of Canada, including the Department of Canadian Food Inspection Agency, Her Officers, Servants, Employees, Successors and Assigns, from and against all manners of actions, causes of action, claims, demands, loss, costs, damages, actions or other proceedings by whomsoever made, sustained, brought or prosecuted in any manner based upon, caused by, arising out of, attributable to or with respect to any failure, inadvertent or otherwise, by act or omission, to fully comply with the said conditions and requirements.

Dated \_\_\_\_\_, in the year \_\_\_\_\_ at \_\_\_\_\_, Province of \_\_\_\_\_

\_\_\_\_\_  
Applicant's Signature

**Verification of Facility Procedures and Processes and Application Approved by:**

\_\_\_\_\_  
Inspector’s Signature  
Canadian Food Inspection Agency

\_\_\_\_\_  
Date