

BEST PRACTICES –INVESTIGATING REPORTS OF PROGRAM VIOLATIONS

The best way to ensure program compliance is through an effective inspection program. Inspections are part of a comprehensive, three-prong approach to program compliance. The process includes government regulations, registered facilities processes and training, and public education and awareness.

Reports of violations from industry are also an important means of gathering information on program compliance. Individuals making reports of violations may identify themselves or wish to remain anonymous. To ensure that reports of violations can be investigated properly the following steps should be taken by HT program staff or field inspectors.

1. **Does CWPCA handle all reports of program violations?** Yes, if the report of the violations is found to be credible.
2. **How does CWPCA determine if reports are credible?** Information must be specific as the nature of the violation.
3. **The information required is:**

Identity of company or registered facility involved	Contact information must be specific as to name, town and street address/phone if available
Reason for violation and how became aware of violation	E.g. What raw lumber is involved and how informant knows it to be non-heat treated
Location of material involved	Where is material located inside or outside a building, be specific on address
Type of material involved	Pallets, crates, lumber
Source Contact Information	Names are not required but a telephone number is helpful if we need to get back in touch
Additional details	Stamp number involved Photos or other evidence is welcome

4. **Does CWPCA maintain confidentiality on reports of violations?** We respect any request to keep the names of informants confidential.
5. **Does CWPCA provide feedback on investigation progress to informants?** No, other than acknowledgement that the investigation is underway there will be no status updates provided.
6. **Can CWPCA investigate any facility that is suspected of wrongdoing?** No, only facilities that are certified under the Canadian Wood Packaging Certification Program are under our jurisdiction. If you suspect a non-registered facility of improperly stamping wood packaging as ISPM-15 certified, please send us the information and we will forward it to the CFIA. If the information provided does not warrant an investigation, we will send the non-registered facility a letter informing them of the program and need for certification.
7. **If the facility is found to be in non-compliance, will they be cancelled permanently from the program?** No, the CWPCP is a program of voluntary compliance. They will likely be suspended but will be accepted back after completing corrective actions.

Anonymous sources can be a credible source

RESPONSIBILITIES & PROCESS FLOW

Initial Contact	<ul style="list-style-type: none"> Collects detailed information If information not detailed enough and unable to obtain additional information the person handling the initial contact makes recommendation as to whether information is credible or not Maintains confidentiality
Program Manager/Lead Inspector	<ul style="list-style-type: none"> Receives reports of initial contact and makes assesment on credibility Make decision together to send inspector and advise CFIA Maintains confidentiality
Program Coordinator	<ul style="list-style-type: none"> Sends CFIA updates on investigation Monitors progress of investigation Maintains confidentiality

