

# HT Program Questions and Answers

---

## Table of Contents

Background.....	1
Application for participation in the HT Program .....	2
Fees.....	2
Wood packaging material regulated under ISPM 15 .....	3
Wood packaging material exempt under ISPM 15.....	3
Production and traceability under the HT Program.....	4
Heat treatment certificates .....	5
Wood packaging .....	8
Segregation of HT wood .....	12
HT Facility Quality Manual .....	13
Auditing the HT Program.....	13
Inactivity in the HT Program.....	14
Registration under the HT Program.....	14

## Background

### 1. **What are the international requirements for the movement of wood packaging materials? When did this take effect?**

In March 2002, the International Plant Protection Convention's (IPPC's) Fourth Interim Commission on Phytosanitary Measures (ICPM 4) adopted new guidelines for the uniform regulatory control of wood packaging moving in international trade: International Standards for Phytosanitary Measures (ISPM) 15: Regulation of wood packaging material in International Trade. ISPM 15 (2013) describes current guidelines for harmonized phytosanitary measures applicable to wood packaging material.

### 2. **How is the HT Program under CFIA Plant Health Policy D-13-01 different from the former Canadian Heat Treated Wood Products Certification Program (CHTWPCP) and Canadian Wood Packaging Certification Program (CWPCP)?**

The HT Program amalgamated the CWPCP and the CHTWPCP. The HT Program allows approved participants to heat treat and export lumber products as well as produce ISPM 15 compliant wood packaging material. The program oversight and procedural elements for registered facilities have not changed and approved facilities will not have to change practices or adjust their quality manuals. The CFIA has simplified requirements and clarified the roles of [alternative service delivery organizations](#).

## Application for participation in the HT Program

### 3. [Where can I get a copy of the application form for registration for the HT Program?](#)

The application form for the Canadian Heat Treated Wood Products Certification Program (HT Program): can be downloaded from here: [Application for Registration Under the Canadian Heat Treated Wood Products Certification Program \(HT Program\) - D-13-01](#)

### 4. [How do I know which of the “registration particulars” to select on the application form?](#)

All registering facilities should consult with an [alternative service delivery organization](#) prior to developing their phytosanitary management system. There may be program requirements that need not be met given the facility's operations. An alternative service delivery organization can ensure that all your needs are met.

### 5. [Who should register in the HT Program?](#)

Facilities should register in the HT program if they wish to produce wood products (i.e. lumber) that are required to be heat treated to a minimum temperature of 56°C through the profile of the wood (including the core) for a minimum of 30 minutes for both export and domestic purposes. Facilities wishing to produce wood packaging material that meets the ISPM 15 standard (whether they heat treat the packaging, produce new packaging or repair/remanufacture wood packaging material) should register in the HT program.

## Fees

### 6. [What fees are applicable under the HT Program?](#)

The CFIA charges a \$400 fee in accordance with the Canadian Food Inspection Agency Fees Notice. Exporters requiring more information on fee schedules may contact any CFIA Regional office or visit the [Fees Notice](#).

[Alternative service delivery organizations](#) will be collecting CFIA Program fees on the behalf of the CFIA.

[Alternative service delivery organizations](#) may also charge fees for registration and audit services provided under this program.

## Wood packaging material regulated under ISPM 15

### 7. Do the ISPM 15 wood packaging requirements apply to all species of wood?

These guidelines apply to all species of both softwood and hardwood products.

### 8. What are the requirements for wood packaging moving across the Canada-U.S. border?

Canadian origin wood packaging crossing the U.S. border is currently exempt from ISPM 15. Canada and the U.S. are moving to implement ISPM 15, including a phased-in approach to enforcement. After implementation, shipments with wood packaging material found to be non-compliant may not be permitted entry. If live pests are detected, the importer may also be required to treat the shipment to prevent pest escape.

Currently, the U.S. accepts Canadian shipments with mixed wood packaging (ie. foreign and Canadian origin wood packaging) provided that a statement: "*All of the unmarked wood packaging material in this shipment is of Canadian origin*" is included on shipment documentation. If the unmarked wood packaging is of U.S. origin, the statement should read: "*All of the unmarked wood packaging material in this shipment is of U.S. origin.*" If the unmarked wood packaging is both Canadian and U.S. origin, the statement should read: "*All of the unmarked wood packaging material in this shipment is of Canadian and U.S. origin.*" Foreign origin wood packaging that has been repaired or remanufactured in Canada must be compliant with the requirements of the HT Program.

## Wood packaging material exempt under ISPM 15

### ~~10.9.~~ What is processed wood?

Processed wood is wood that is comprised wholly of composite wood based products that have been entirely created using glue (e.g. plywood), heat and pressure (e.g. particle board) or a combination thereof. Plywood, oriented strand board, particle board and veneer are examples of processed wood that are exempt from ISPM 15 wood packaging import requirements.

### ~~11.10.~~ What type of packaging materials is exempt from ISPM 15 wood packaging import requirements?

ISPM 15 does not apply to:

- Processed wood (e.g. veneer, oriented strand board, particle board, plywood, etc.); or
- Non-wood material (e.g. plastic, metal, cardboard, etc.).

Wood packaging made of these types of commodities does not need to be produced under the HT Program. However the wood packaging must be entirely comprised from exempt material(s) in order to be exempt from ISPM 15 requirements. Wood packaging

that is made from a combination of exempt materials and sawn wood is regulated and must comply with ISPM 15 requirements.

## **Production and Traceability under the HT Program**

### **12.11. Can I still produce ISPM 15 compliant HT wood packaging or secondary manufactured HT wood if my facility doesn't have a kiln?**

Facilities registered under the HT Program that do not have a kiln may produce HT wood packaging or secondary manufactured HT wood by obtaining HT wood from other facilities registered in the HT program.

However, facilities registered with a CLSAB Accredited Agency must obtain HT wood from facilities registered with a CLSAB Accredited Agency to maintain compliance with the CLSAB Regulations. This requirement does not apply to wood used in production of ISPM 15 marked wood packaging material. When a registered facility obtains HT material from another registered facility, they must have procedures in place to ensure traceability of the wood back to the registered facility from which it was obtained. This includes:

- i. A copy of the Heat Treatment Certificate(s) issued for the consignment; **or**
- ii. A recognized certification mark appearing on the lot, consisting of:
  - the mark (CA), (Where CA= Canada) and the facility's CFIA issued 5-digit registration number and the treatment applied (HT or KD-HT); **or**
  - the CLSAB Accredited Agency's logo and the agency issued mill designation and the treatment applied (HT or KD-HT); **or**
- iii. Each piece of lumber must display a CLSAB Accredited Agency logo, the agency issued mill designation and the HT or KD-HT mark; **or**
- iv. Each item in the lot must display bundle tags and/or wrappers that follow the labelling nomenclature outlined in 2.1.2 of D-13-01 and used in the manner identified in the facility's quality manual.

## **12. What is secondary manufactured wood?**

Wood products which have undergone processing beyond primary sawing and planing are considered secondary manufactured wood products. Products include: flooring, cabinets, furniture, millwork, siding, shakes/shingles, and reworked items such as: trusses, walls, floors, structural insulated panels, etc. A facility registered under the HT Program must identify within its quality manual the procedures, documentation and other practices used in ensuring that secondary manufactured wood products remain compliant with requirements.

**13. Can U.S. lumber be used within the HT Program for production of secondary manufactured wood or ISPM 15 wood packaging material?**

Lumber obtained from the United States to be used by a facility registered under the HT Program must be heat treated at a facility that is monitored by the American Lumber Standards Committee (ALSC). All wood must be marked in accordance with ALSC requirements or accompanied by documents attesting to heat treatment issued in accordance with ALSC requirements. The Canadian registered HT facility must outline the origin of wood in their quality manual regardless of whether it is from Canada or the U.S.

**14. Can a facility registered under the HT Program supply U.S. wood packaging facilities with Canadian sawn HT wood or secondary manufactured HT wood?**

All Canadian lumber, either in bundles or custom cut (pre-cut) units for assembly into wood packaging, exported to the U.S. must meet the requirements of [the wood packaging enforcement regulations of the American Lumber Standard Committee](#).

According to the American Lumber Standard Committee program, all Canadian lumber used by an American wood packaging facility must be marked HT or KD-HT under the supervision of a Canadian Grading Agency accredited by the Canadian Lumber Standards Accreditation Board and the American Lumber Standards Committee.

**Heat treatment certificates**

**15. Under what conditions are Heat Treatment (HT) Certificates required?**

Heat treatment certificates should be used only when an importing country accepts these certificates as a phytosanitary import requirement. Currently, only the countries of the European Union, Australia, Mexico and South Korea accept these certificates. A domestic heat treatment certificate can be issued for shipments of treated wood moving between facilities registered under the HT Program within Canada. Further information on the use of certificates may be obtained from an [alternative service delivery organization](#).

**16. Can I revise a Heat Treatment Certificate once I have issued one to a non-registered exporter?**

Heat treatment certificates shall not be altered after issuance. Should a registered facility issue an export heat treatment certificate to a non-registered exporter for the export of wood to a country which accepts the certificate, the certificate can only be used for export in the form that it is received from the registered facility.

Should a non-registered facility wish to change the information on a certificate following issuance, the registered facility may issue an amended certificate only if the non-registered facility can demonstrate that no changes to the shipment have occurred following departure from the registered facility.

It is recommended that all exporters of heat treated wood register under the HT Program, which then permits exporters to issue certificates for heat treated sawn wood received by the facility.

- 17. Can the boxes on the Heat Treatment certificates designated "For optional use of exporter" be filled in after the certificate has been signed by an authorized representative of the registered facility?**

Heat treatment certificates shall not be altered after issuance.

- 18. Can a registered facility provide a blank certificate to an exporter, so that they may fill out the export details?**

Heat treatment certificates can only be issued by registered facilities. Providing blank certificates to an exporter is not permitted.

- 19. Do(es) the facility number(s) recorded on the heat treatment certificate need to match the facility number(s) on the sawn wood?**

Not necessarily. For example, an export shipment may consist of multiple sources of wood. The certificate may identify the registered facility consolidating the shipment. The producing facility number(s) may be added to the description box to avoid issues at the port of entry.

- 20. What information needs to appear in the "Description of Consignment" box? (ie. volume, # of packages, # of pieces, botanical name, common name, dimensions etc)?**

The description box may include information on the genera, marks, grades, numbers of packages, lot or bundle numbers, volume and other appropriate descriptors of the consignment. If space on the form is insufficient, attach additional pages, and indicate on the face of the certificate, in the "Description of Consignment" block, the number of supplementary pages appended. These additional pages must bear the mill number, certificate number and the authorized signature.

- 21. Can unmarked wood packaging associated with the shipment be included on the Heat Treatment Certificate?**

This depends on the importing country's requirements regarding wood packaging and dunnage. Some importing countries do not regulate dunnage accompanying wood if the accompanying dunnage is of the same type as the wood in the consignment. However other countries may require the accompanying dunnage to be ISPM 15 compliant.

**22. For importing countries requiring a phytosanitary certificate, can a heat treatment certificate be sent in addition to the phytosanitary certificate?**

It is recommended that only the required phytosanitary document accompany the consignment to avoid setting precedent or causing unnecessary confusion at the port of entry.

**23. Can a phytosanitary certificate be issued for wood packaging material?**

Usually, if a country is signatory to the IPPC and has adopted the ISPM 15 standard, the CFIA will not issue a phytosanitary certificate. Consult your [local CFIA office](#) for additional information on certification requirements.

**24. Is it still necessary to get a phytosanitary certificate to export if a facility is registered under the HT Program?**

Phytosanitary certificates are only issued when the importing country requests documentation from the National Plant Protection Organization to certify that the commodity meets their import requirements. Canada has developed bilateral arrangements with some countries which allows for heat treatment certificates to accompany the export in lieu of a phytosanitary certificate. However, even if your facility is registered on the HT Program you may still require a phytosanitary certificate to export to certain markets. Exporters are advised to contact their local CFIA office for import requirements to a specific country.

**25. If I am registered in the HT Program, do I still need to get an inspection from the CFIA to get a phytosanitary certificate?**

Although the CFIA retains authority to inspect, an inspection is generally not required if both the producing facility and the exporter are registered and in good standing under the HT Program and the only requirement is the verification of heat treatment. If there are other requirements an inspection may be required.

**26. Who is eligible to issue a Certificate of Heat Treated – Dried Wood for Mexico?**

Facilities registered in the HT Program producing heat treated and kiln dried wood may issue a certificate for shipments of wood to Mexico.

## Wood packaging

### 27. What are the international guidelines for the movement of wood packaging materials, as described in ISPM 15 for Canadian Wood Packaging?

All wood packaging (e.g. pallets, containers, drums, etc.) made from non-processed wood must meet the following requirements:

- Made of wood that has been debarked so that any number of visually separate and clearly distinct small pieces of bark are less than 3 cm in width (regardless of the length of the piece) or if greater than 3 cm in width, the total surface area of the individual piece of bark must be less than 50 square cm (generally thought to be smaller than a credit card).
- Heat treated to a minimum core temperature of 56°C throughout the profile of the wood (including the core) for a minimum of 30 minutes in a facility registered under the HT Program and;
- Marked as per requirements of the HT Program

Wood packaging comprised entirely of manufactured wood (e.g. veneer, oriented strand board, particle board, plywood, etc.) or non-wood material (e.g. plastic, metal, cardboard, etc.) is not regulated and does not require certification.

ISPM 15 also permits fumigation with methyl bromide as a treatment for wood packaging. However, methyl bromide fumigation is not permitted in Canada for the production of wood packaging.

As new technical information becomes available, existing treatments may be reviewed and modified, and alternative treatments or new treatment schedules for wood packaging material may be adopted. If a new treatment or revised treatment schedule is adopted for wood packaging material and incorporated into ISPM 15

### 28. How should the ISPM 15 mark be applied to wood packaging material that is made up of both processed wood products and non-processed heat treated wood products (i.e. a plywood box with 2x4 frame)?

Where various components are integrated into a unit of wood packaging material, the resultant composite unit should be considered as a single unit for marking purposes. On a composite unit of wood packaging material made of both treated wood and processed material (where the processed component does not require treatment), it may be appropriate for the mark to appear on the processed wood material components to ensure that the mark is in a visible location and is of a sufficient size. The mark should appear on a minimum of two opposite sides of the unit. This approach to the application of the mark applies only to composite single units, not to temporary assemblies of wood packaging material.



**29. Where can ISPM 15 compliant wood packaging be sourced from?**

Contact an alternative service delivery organization for information on registered HT facilities producing ISPM 15 compliant wood packaging.

**30. Can exporters that are not registered in the HT Program receive partially assembled, wood packaging from a registered facility and then complete the assembly at the non-registered facility once the commodity is ready for export?**

Packaging products such as cable reels, crates and fish boxes are partially assembled which is defined as requiring no further manufacture and commonly shipped to the exporter “knocked down” either to save shipping cost or to be installed around the commodity where final assembly is completed. Each subassembly component of the box or crate must be marked by the registered facility. Reel flanges must be marked but staves can be supplied in bulk accompanied by a bundle tag indicating they are HT certified. Exporters may complete the assembly of these products provided that no components are added.

Packaging that is completely unassembled can be assembled by a non-registered facility; however the registered facility must ensure the following conditions are adhered to:

- The registered facility specifies in its quality plan the procedures used to ensure that wood packaging units assembled off site are compliant with ISPM 15 and D-13-01;
- The wood packaging is provided to the exporter in a manner that all necessary components to assemble the unit into a single pallet, box, or crate is present and no other wood could be used in its assembly;
- Instructions on assembly of the wood packaging are provided to the exporter;
- The wood to be assembled is marked only to the extent that once complete, it is compliant with ISPM 15 and D-13-01;
- The unit to be assembled is sold directly to a facility or client which assembles it into a completed unit;
- The number of units moved off site is limited to not more than 3 times per year with a maximum of 20 units per time;
- The registered facility keeps records for a minimum of two (2) years of all wood packaging assembled off site. The records should include at least the client names, the number of units sold, and the fabrication date;
- The wood packaging units are assembled in Canada.

Exporters wishing to assemble more than the number of units allowed must register in the HT Program.

**31. Can the ISPM 15 certification mark for wood packaging be applied to the unit at a location other than the registered facility?**

A facility registered under the HT Program may manufacture, assemble and mark wood packaging at a site that is not registered if it is impossible to assemble the unit at the

registered facility. The registered facility must ensure all of the following conditions are adhered to:

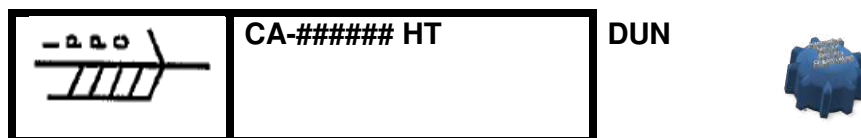
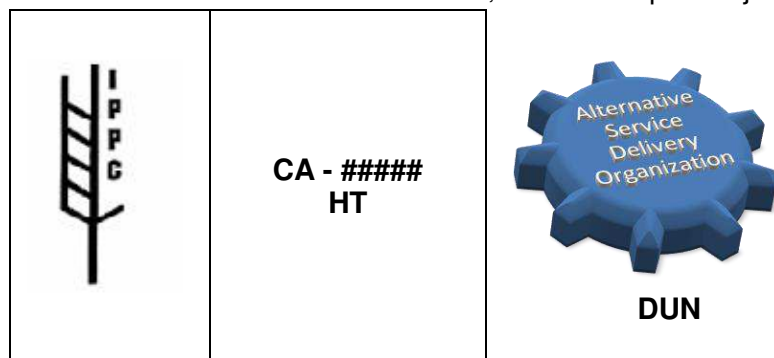
- The registered facility specifies in its quality plan the procedures used to ensure that wood packaging units assembled off site are compliant with ISPM 15 and D-13-01;
- The assembling and marking procedures used by the registered facility must be defined in their quality manual and approved by the alternative service delivery organization;
- The assembly and marking of the wood packaging must be performed by a trained and authorized employee of the registered facility;
- The registered facility keeps records for a minimum of two (2) years of all wood packaging assembled off site. The records should include at least the client name, the number of units sold, and the fabrication date;
- The wood packaging is assembled and marked in Canada

**32. Is registration in the HT Program required in order to repair wood packaging with non-regulated articles (e.g. plywood, OSB, veneer, plastic, metal) only?**

Those repairing wood packaging for export with only processed wood products (e.g. plywood, OSB, veneer, plastic, metal) need not be registered. However, the mark on the wood packaging must remain clearly legible and in accordance with ISPM 15. All other repair or remanufacturing of wood packaging must be conducted in accordance with HT Program.

**33. Is it necessary when marking wood packaging with the ISPM 15 mark to also include the alternative service delivery organization's logo or registration number?**

Logos and registration numbers (other than the CA-##### registration number) must not appear inside the borders of the ISPM 15 mark, but can be placed just outside the mark.



**34. What is the proper way of marking heat treated dunnage (i.e. single units of wood used in bracing or supporting a cargo)?**

The mark must be placed in a location that is visible when the wood packaging is in use, preferably on at least two opposite sides. Some dunnage may be cut to final length just prior to its final use; therefore, special consideration must be made to ensure that all units bear the mark appropriately. Applying multiple marks along the length of the wood in short intervals may ensure that the mark is present on all units after final alterations. Alternatively, the registered facility could make arrangements to apply the mark after final alterations.

**35. What is dunnage and what can it be used for?**

Dunnage is defined by ISPM 15 as wood packaging material used to secure or support a commodity but which does not remain associated with the commodity. Dunnage may be used to block and brace goods after they are placed in a container. Wood used to block or brace goods can be nailed to ensure it remains affixed, but is not attached with the purpose of moving with the goods once the container has been unloaded.

Dunnage is not intended for use in the construction of wood packaging such as pallets, crating or boxes which support, protect and allow a commodity to be carried.

Alternative service delivery organizations (ASDs) shall inform facilities under their oversight of the requirements for the use of dunnage. When improper use of dunnage is encountered, the ASD under whose inspection program the dunnage was produced will take corrective action with the producer and will notify the customer. If improper use is not corrected, the ASD under whose supervision the dunnage was produced shall at a minimum notify the producer and the customer or owner of their responsibilities should any damages and liability arise from the improper use of dunnage.

If the ASD identifies a registered facility under the oversight of another ASD that is supplying dunnage which is being improperly used, then the CFIA should be notified. The CFIA will initiate follow-up at the registered facility by the responsible ASD.

**36. Should dunnage be marked differently from other wood packaging?**

The ISPM 15 mark must be applied to all types of wood packaging including dunnage. Dunnage or other single pieces of wood used in bracing or supporting a commodity should include the additional mark: "DUN" which must be placed outside the ISPM mark borders (see example at question 33). Registered facilities should contact an [alternative service delivery organization](#) to obtain additional information on requirements.

**37. Are deviations of ISPM 15 mark permitted?**

Marks must conform to the examples provided in Appendix 2 of Plant Health Directive D-13-01. Registered facilities must have a sample mark depicted in their quality manual.

**38. What size mark is required to be placed on a certified pallet?**

There is no size specification for the application of the mark to certified wood packaging. However, the stamp must be legible, visible, placed on a minimum of two sides of the packaging unit and should be in colors other than red or orange.

**39. What is the problem with illegible marking on wood packaging?**

Failure to appropriately mark wood packaging could result in complications when examined by import control officials upon entry into an importing country. A registered HT facility may not be issued a non-conformance if an inspection of completed ISPM 15 compliant WPM by the alternative service delivery organization indicates that less than 10% of the product is improperly marked. However, the facility must re-mark any non-conforming wood packaging.

**40. Who enforces the international wood packaging import requirements?**

Once the wood packaging arrives in a country which has implemented the ISPM 15 standard, the National Plant Protection Organization or its Customs authority may inspect the wood packaging materials to ensure the import requirements are met. Some countries verify import requirements based solely upon the shipping documentation. Exporters may wish to include a statement on the shipping documentation which indicates that the wood packaging contained in the consignment complies with ISPM 15 to facilitate the entry of the consignment.

The Canadian Border Services Agency (CBSA) performs inspections for wood packaging arriving in Canada.

**41. Does Canada have wood packaging import requirements?**

Import requirements are described in policy [D-98-08: Entry Requirements for Wood Packaging Materials Produced in All Areas Other Than the Continental United States](#). This policy includes the requirements for dunnage.

**Segregation of HT wood**

**42. What does “segregation” mean under the HT Program?**

Segregation is the separation of treated from untreated wood or wood packaging to ensure that mixes of compliant and non-compliant product do not occur. Untreated wood may be physically separated from treated wood, or other methods such as clearly marking treated *versus* untreated wood or clear signage; etc. may be used. Treated wood should not be stored directly above or below untreated wood.

## HT Facility Quality Manuals

### 43. Who can assist in developing a facility quality manual?

Alternative service delivery organizations are available to help with the development of quality manuals for facilities wishing to become registered under the HT Program.

## Auditing of the HT Program

### 44. Who audits the facilities in the HT Program?

All facility audits are performed by approved alternative service delivery organizations. CFIA may also conduct facility audits.

### 45. What is a non-conformance?

A non-conformance is a failure to comply with a specified requirement of the facility quality plan as identified by an auditor during a facility audit. Depending on the severity of the non-conformance, the facility is provided with a specified period to correct the non-conformance. Failure to correct a non-conformance may result in a facility being removed from the program.

### 46. What is a non-compliance?

Non-compliance is a violation of Canadian or foreign legislation or regulation (e.g. the export of a non-compliant product is a non-compliance).

### 47. What are the consequences for exported Canadian wood packaging that does not comply with a foreign country's wood packaging import requirements?

If Canadian wood packaging does not comply with the import requirements of the country of destination, the following may occur:

- The consignment is refused entry into the importing country and may be required to be removed from the country; or
- Non-compliant wood packaging may be separated from the commodity and destroyed; or
- Non-compliant consignments may be treated or destroyed; or
- The consignment may be detained until other actions are taken.

Failure to meet the phytosanitary import requirements of a foreign importing country is also a violation of the *Plant Protection Act* and *Plant Protection Regulations*, and may lead to enforcement actions by the CFIA under the [\*Agriculture and Agri-Food Administrative Monetary Penalties Act\*](#).

**48. What does suspension from the HT Program mean?**

Suspension means that a facility cannot certify any wood products as heat treated or apply the ISPM 15 mark to wood packaging. Suspension results from a critical non-conformance that has not been corrected in sufficient time. A facility will only be reinstated once it completes all corrective actions.

**49. What does cancellation from the HT Program mean?**

A facility's registration from the HT Program may be cancelled if it fails to pay the CFIA annual registration fees, fails to pay program audit service fees or is found to be unable to maintain conformance with HT Program requirements.

**50. What happens to the CA-number when a facility withdraws for any reason from the HT Program?**

Certification numbers are not re-used. If a facility voluntarily withdraws from the HT Program, the facility may reapply for participation and request the CA number previously prescribed to the facility. If a facility's registration in the HT Program is cancelled, the facility may reapply for registration once corrective actions have been undertaken. The facility will receive a new registration number once it is approved for participation.

**Inactivity in the HT Program**

**51. If an HT facility ceases operations for a period throughout the year (i.e. seasonal operations), are audits still needed during the seasonal shut down?**

Audits are not required during periods of inactivity provided all stamps and certificates are surrendered or placed under care and control of the Alternative Service Delivery Organization. All certification activities must cease including marking of wood packaging, certification of heat treated lumber or the issuance of heat treatment certificates. An audit will be performed at the time the facility restarts operation if the facility is inactive for a period of six (6) months or more.

**Registration under the HT Program**

**52. If a Heat treatment facility and the actual shipper are under the same ownership, but in two separate locations, are they required to obtain two separate registration numbers or can they operate as one entity under a single registration?**

Two facilities with distinct production processes intended to facilitate a single output may operate as a single entity, provided the facilities are in close proximity to one another; the

quality manual accounts for activities at both operations and that all phytosanitary procedures at both facilities comply with the requirements of the program. A company with multiple production sites located in various locations cannot operate as a single facility.

**53. What is the process of registration under the HT Program?**

