



January 20, 2023

**Re: D-22-04 Box tree moth (*Cydalima perspectalis*) – domestic and import phytosanitary requirements consultation**

Thank you for the opportunity to provide comments from the Canadian nursery sector on the directive referenced above. CNLA is Canada's premier association to advocate for issues of national concern on behalf of their members engaged in the outdoor ornamental horticulture sector. Organized as a federation, CNLA's members are nine provincial associations representing 3,600 member companies engaged in the wholesale nursery grower, landscape contracting, and retail garden centre value chain.

Overall CNLA and its members are in support of this directive and have appreciated the speed at which it has been developed. Having this directive in force by the end of March, and pest modules approved in time for spring shipping season is critical. Ontario growers supply boxwood to markets outside of Ontario and will need access to these markets, given that the sector is already prohibited from shipping into the US.

The prohibition of movement of boxwood from the regulated area to British Columbia is the one area that generated the most discussion with industry. While we understand this was intended to align with a priority goal of the sector, to maintain pest freedom in BC so that USDA-APHIS will allow boxwood from BC into the US market again, it also has the potential to conflict with another industry priority goal of using the BTM pest module to gain access to the US market for Ontario boxwood growers in the future. The concern is that USDA-APHIS will not consider the pest module approach to BTM in regulated areas as a sufficient phytosanitary action to allow imports of Ontario boxwood if CFIA itself does not accept the systems approach as sufficient to ship from Ontario to BC.

CNLA suggests that the directive indicate that the prohibition of boxwood movement from regulated areas to BC will be reviewed annually. The review could evaluate the effectiveness of the BTM pest module approach in preventing spread of BTM outside of the regulated area through nursery trade.

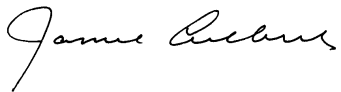
For facilities in regulated areas that are not on an established systems-based program (CNC/USNCP, Clean Plants, GCP) as noted in 6.2.1, it is very important that the CFIA only accept the same level of compliance to the developed systems as for those facilities that are on one of the established programs. The success of this approach will be compromised if there is a lower quality program available.

CNLA is most appreciative for CFIA's collaborative efforts with the nursery sector in the development of the *Cydalima perspectalis* (box tree moth) pest module in Appendix 1 of the directive. We are in support of the concept of the BTM pest module as an auditable system to support the issuance of domestic movement certificates. It is our hope that this approach is used for more pests in the future and that the BTM pest module in particular supports the issuance of export certificates to the US market soon.

Since the pest module was developed, CNLA and LO have identified two areas where edits should be considered and agree on the suggested solutions. First, in the risk assessment of the facility in Section A.4, the link between identified risks and actual measures a farm takes to address those risks is unclear. It is suggested that the language be improved to clarify how a facility would identify their risks and provide guidance on how they could determine which measures apply. Second, Section A.8 notes that if a pest is found within a pest exclusions structure, CFIA must be notified. It is not practical to notify CFIA of pest finds within regulated areas where those pests would normally be present. It is suggested that the requirement for notification to CFIA be removed except for finds outside of the regulated areas.

For CNLA, managing the spread of BTM in North America while maintaining access to all our traditional markets remains one of our top priorities. We appreciate CFIA's support in working with us to achieve this goal and also for the opportunity to provide comments to this directive. If you need any further clarification on the points raised by CNLA, please contact me at any time.

Yours sincerely,



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cc. CNLA Box Tree Moth Task Force  
cc. Jeff Olsen, Growers Canada Committee chair  
cc. Victor Santacruz, CNLA Executive Director