Canadian Nursery Landscape Association
Association Canadienne des Pépiniéristes et des Paysagistes

February 2, 2023

Re: RMD-22-03: Pest Risk Management Document: Risk management proposal for spotted lanternfly (*Lycorma delicatula* [White]).

Thank you for the opportunity to provide comments from the Canadian nursery sector on the pest risk management document 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.

Nursery growers in Canada have been on heightened alert over the past few years as reports of spotted lanternfly populations establishing and then spreading in the United States became more and more frequent. With over 100 plants that are hosts for spotted lanternfly, many of them being commonly grown and sold by our members, coupled with the multitude of pathways for introduction of the pest into Canada, it is clear that all Canadians need to cooperate in efforts to keep the pest from entering Canada and be ready to actively respond when the pest eventually is detected in our country.

Although we don't argue that possible pathways of entry include plant commodities such as nursery stock and forestry products, it appears that the other pathways which include conveyances, shipping containers and household goods are not going to be regulated at all. Since spotted lanternfly woody plant hosts exist in the natural environment in Canada, these other pathways could hasten the establishment of spotted lanternfly populations in Canada's natural environment. Once in the natural environment, nurseries will be challenged to keep spotted lanternfly from entering the nursey through natural spread. Regulating movement of nursery stock does not mitigate this risk and we request that more consideration and resources be invested in managing the risk of spread posed by these other pathways.

If spotted lanternfly is detected on a nursery farm the risk management proposal indicates that the party in care and control of the infested article or area would be responsible for arranging any treatments ordered and associated costs. If it is an established population

then a notice of prohibition of movement could also be issued. Both of these actions, when applied to all propagative woody plant material, both rooted and unrooted on a nursery would be economically devastating to the farms involved and would result in lost sales, destroyed product, lost markets and significant losses in revenue. As such, CNLA requests that compensation to nursery growers for these losses be provided by the government of Canada in the event that they occur due to a regulatory order related to spotted lanternfly. In addition, it will be important that CFIA is very clear with industry and stakeholders whether the pest is detected or established and what phase of control action they are in.

CNLA does agree that the risk of introduction and spread through the movement of nursery stock can be mitigated through a systems approach with a pest specific module or a targeted inspection program. We are also in agreement that Option 3 proposes the best alternative to managing this risk when the pest becomes established within Canada.

With respect to this option, we ask that CFIA consider these items when Option 3 is developed:

- Consideration be given to growing outside of a screen house if the time period of outdoor production occurs outside of the flight period of spotted lanternfly, when there is no risk of egg laying.
- A spotted lanternfly pest module developed for the Clean Plants Program administered and audited by the Canadian Nursery Certification Institute be considered as a CFIA-approved SLF certification program to support issuance of a domestic movement certificate without the requirement for a CFIA inspection.

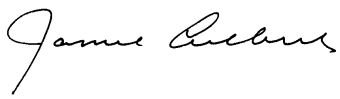
As we have seen with box tree moth and strawberry blossom weevil, a collaborative approach between the ornamentals sector and CFIA can result is the development of effective pest modules to support domestic and international movement of nursery stock. Therefore, we ask that a similar collaborative approach be taken when developing the CFIA-approved SLF certification program for nursery growers across Canada.

Although it is outside of this risk management proposal to predict how USDA-APHIS will restrict imports of nursery stock from Canada once spotted lanternfly is detected or established in Canada, we believe they will impose some new requirements, similar to how they regulate spotted lanternfly in the US. Our concern is that these new requirements will be imposed on the entire country regardless of where the pest is detected. Therefore, it will be critical to have credible surveillance data that delineates pest free areas in Canada and request that CFIA commit to a national surveillance program for spotted lanternfly in Canada as part of its risk management proposal.

Invasive pests and diseases will continue to challenge the Canadian nursery sector and spotted lanternfly is the latest pest we are challenged with. Slowing the entry and

slowing the spread of SLF in Canada while maintaining access to all our traditional markets and protecting Canada's natural environment is a huge challenge. We need to work together, and we appreciate CFIA's inclusion of our sector in reviewing the risk management proposal developed. If you need any further clarification on the points raised by CNLA, please contact me at any time.

Yours sincerely,



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