



Canadian Food Inspection Agency
Plant Protection Division
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October 25, 2024

RE: Consultation on D-24-01 (Spotted lanternfly (*Lycorma deliculata*) – domestic and import phytosanitary requirements

Landscape Ontario represents ornamental nursery growers as part of our greater mandate to support the entire green infrastructure sector in Ontario. Our growers' sector relies heavily on domestic trade in central-eastern Canada as well as on exports to the northwestern United States. Farm gate sales of nursery products exceeded \$300 million in 2023, representing nearly half of all Canadian nursery sales.

We understand the significant risk to the grape production sector in Canada from the Spotted Lanternfly (SLF) and are fully aware that regulatory measures can slow the introduction and spread of pests. With the lack of tools available for managing SLF infestations, time is a critical component of the strategy to mitigate the impacts to both agricultural sectors, tourism and the environment. At the same time, we are very concerned about the disproportionate burden that is being proposed to the nursery sector relative to risk.

The primary pathway for spread of SLF is transportation, and not nursery stock. While SLF clearly prefers deciduous trees due to proximity of a food source, adults lay eggs on any available surface. Trees and shrubs are not items moved carelessly onto or into a flatbed or transport truck without inspection. Nursery producers inspect their plants for shipping, with facilities practicing best management practices similar to a systems approach (inspections of inbound materials, frequent and intentional scouting activities, inspection of outbound materials, as well as inventory control and traceability). Further, these farms have rigorous Integrated Pest Management (IPM) programs in place in response to increasing customer demand for pest-free plants. Shipments received with innocuous common landscape pests such as aphids are unacceptable and are returned to the farm at their cost. Railways, materials transport, and recreational travel have nowhere near the level of scrutiny continuously maintained in the nursery sector. The logic behind the decision to regulate nursery stock can only be attributed to the ease of regulating this sector as opposed to finding feasible solutions for managing the much greater risks associated with transportation. Fundamentally, we do not believe it is appropriate to regulate nursery stock for SLF for facilities that follow standard farm practices.

Within the proposed directive we have also identified some points of concern:

1. The only feasible option for the issuance of domestic movement certificates (DMCs) for the nursery sector is the third (produced and maintained at a facility officially recognized by CFIA as free from SLF). The first option (inspection by CFIA) would require significant resources and is impractical unless a blanket DMC could be issued to ensure timely processing. The second option (production entirely within a pest exclusion structure) is completely unreasonable for



nursery stock. However, with the third option, there are a number of concerns detailed in the table below.

2. The proposed directive fails to clearly define the approach for after the pest is established in Canada. The current directive is focused on the early detection phase. We ask that you engage our sector to discuss long-term management solutions for SLF.
3. There needs to be a long-term plan for managing SLF without incurring undue burden and economic costs associated with regulating nursery stock and logs. The actual impacts of this insect are unknown, but information from the US suggests that the impacts to many sectors may not be as serious as anticipated. Intensive regulations will be difficult to rollback once set in place.

Detailed Concerns with D-24-01 Appendix 5

Concern	Details
Lack of tools	There needs to be investment in additional chemical control tools to manage the pest. Essentially, the nursery sector in Canada can only rely on safeguarding for management of SLF (Altus is available but is not a full control option)
Safeguarding	Safeguarding is required whenever nursery stock is transported. This requirement completely disregards the insect’s biology and is unnecessary between December and June when there are no nymphs or adults present.
Pest module	There is no mention of a pest module in the directive. Collaboratively (industry & regulator) developed pest modules provide confidence that the sector is employing appropriate tools to manage the risk of pest introduction and spread.
All production required to be ‘pest free’	With this insect, it is unreasonable to regulate all plants in production. Only plants staged for shipping should be included in the directive. Making this change would also open the door for post-harvest treatment options in the event a suitable agri-chemical is available in Canada.
Clean Plants facilities not recognized	While the GCP and CNCP are recognized in the directive, we request that CFIA include participation in the industry-audited Clean Plants program. There are far more facilities in Canada participating in Clean Plants than the CNCP.
Cessation of shipping	Once SLF is established in an area, it does not make sense to stop shipments from a nursery facility if the insect is found on a farm. If the directive separated actions appropriate for the early detection phase from the established pest phase, this requirement could be included for the early detection phase only. However, we request that CFIA work closely with any affected operation to minimize the economic impacts. Here again, pre-shipment inspections and safeguarding plants prior to shipping would be more impactful.
Resumption of shipping	There is no information in the directive that guides CFIA and affected facilities on the criteria for allowing shipping to resume. If there is an opportunity to develop this guidance in collaboration with our sector it would be appreciated.



In summary, we have serious concerns with the regulation of nursery stock for this pest and believe that our current normal farm practices will be sufficient to slow the spread of SLF based on the level of risk presented by our sector. We contest that the transportation pathway should be the primary focus of regulatory action and controls. All industries moving products and equipment have a responsibility to prevent the introduction and spread of SLF, but identifying the nursery sector as a primary pathway by regulating our products is unjustified. Our sector is unprepared to carry the additional burden of regulation of our products and we anticipate significant economic losses in the event of SLF detections. However, we are prepared to constructively engage with CFIA to find alternative approaches for mitigating the risk from this insect. As always, we are committed to working with CFIA and relevant sectors to achieve improved outcomes.

Sincerely,

A handwritten signature in black ink, consisting of several overlapping, sweeping lines that form a stylized name.

Dr. Jeanine West

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Landscape Ontario Horticultural Trades Association

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CC: Joe Salemi, Executive Director, Landscape Ontario

CC: Jamie Aalbers, Grower Sector Specialist, Canadian Nursery Landscape Association

CC: Landscape Ontario Growers' Sector Group