



Canadian Food Inspection Agency  
Plant Protection Division  
59 Camelot Drive, Ottawa, ON K1A 0Y9

October 25, 2024

Following is Canadian Nursery Landscape Association's (CNLA) response to CFIA's consultation on D-2024-01: Spotted Lanternfly (*Lycorma delicatula*) – domestic and import phytosanitary requirements. 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.

After consulting with nursery growers across the country we have some suggestions and also concerns about the impacts this directive will have on the Canadian nursery sector if it is adopted as currently written. Firstly, the three options presented for nursery stock moving from a regulated area to a non-regulated area in Canada will have significant and costly impacts to growers who are caught within a future regulated area.

The directive states that for nursery stock to move out of that regulated areas to a non-regulated area, a CFIA-issued movement certificate based on one of the following options. Our concerns with each option are listed below:

1. The material is inspected by CFIA and found free from SLF

This option translates into every shipment leaving a nursery in the regulated area for customers outside the regulated area have a phytosanitary inspection by a CFIA inspector.

- The feasibility of practically following through on this is questionable
  - o Does CFIA have the resources needed to complete these inspections in a timely manner?
  - o Spring shipping season is hectic enough for growers – adding in an inspection process is likely to cause delays which will be costly for growers and could jeopardize nursery/customer relationships.
- Could there be an option for facilities to receive a blanket domestic movement certificate through a pre-inspection, or bench inspection?
- Electronic issuance of DMC's will be needed to ensure timely delivery, especially in the spring

▪ OR

2. The material is produced exclusively in a CFIA-approved screenhouse or alternate enclosed structure that excludes SLF





This option is impractical for nursery stock and will not be used.

- OR
  - 3. The material is produced and maintained at a facility officially recognized by CFIA as free from SLF through administration of the SLF Program. Facilities participating in the CNCP or GCP may implement a CFIA accepted pest module for SLF in lieu of participation in the SLF program. A movement certificate is still required for this material.
- This option fits well for growers in Clean Plants, CNCP or GCP, but they are a minority of nursery growers in Canada. Most do not participate in these programs and do not have the underlying systems in place for a PCP.
  - Can the Clean Plants program be recognized by CFIA as another program for which the addition of a CFIA approved pest module is acceptable to issue domestic movement certificates?
  - There needs to be recognition that the detection of SLF when it is not established in an area require different procedures than a detection when the pest is established within an area
    - To stop shipments when a pest is found on a farm once the pest is established in an area does not make sense. Safeguarding plants prior to shipment is more important and would manage the risk so the pest is not on plants leaving the nursery.
    - Industry needs clear direction, more details in the directive and PCP guidelines on the requirements after the pest is established
    - Can there be wording in the directive that allows for revisions as the science evolves and the pest becomes established
  - Safeguarding itself is challenging and without pesticide options it becomes even more challenging. Altus is registered for outdoor nursery stock, but its efficacy is questionable. It's labelled for "suppression", not full control and it is not effective on adults. More control options are needed for nursery stock and there are few options that have efficacy AND potential for registration in Canada
    - OMAFA has conducted significant work on searching for SLF control options, including products available to US growers like Bifenthrin, Beta-cyfluthrin, Dinotefuran – but due to company and PMRA decisions these options are not available
    - There is no current path forward for other products for SLF control in nursery stock in Canada – how can safeguarding, let alone a successful IPM control program, be written into the PCP without any tools available for achieving them?
    - U.S. growers have indicated that Bifenthrin is effective on adult SLF and the best pest control option they have. CNLA requests that CFIA support efforts to have Bifenthrin registered in Canada for SLF in outdoor nursery stock.
  - Can CNLA and CFIA work together to develop a template for the PCP/pest module for SLF, and have it added as an appendix to the Directive?
    - We need to ensure the PCP encompasses risk mitigation activities at the detection phase and the established phase





- Ideally the PCP/pest module template should mirror the Box Tree Moth pest module
- Once SLF is detected in Canada there will be a rush by growers to have PCPs approved. This proved to be problematic when the Box Tree Moth directive was implemented – the recommendation is that if/when this directive is complete, it be signed and implemented in the slower seasons for nursery growers (late fall, early winter)
- There should be recognition for plant material that is staged for shipping versus plants currently in production, with greater focus on plants staged for shipping. In other words, a non-economic damage level of SLF presence is acceptable in production, but in the last month of production, pre-shipping actions to manage the pest risk are implemented to ensure pest free plants at the time of shipping. Again, if there was a “post-harvest” treatment that effectively controlled the life stages of SLF, this could be employed during the pre-shipping period as one of those actions.
- In the case a stop-shipping order is issued to a farm, what will the requirements be to resume shipping? This is not clear in the directive. Is there an opportunity to engage with CNLA or provincial nursery associations to support the facility through this situation?

Secondly, we also have some general comments with respect to the directive itself and how SLF is managed in Canada:

It's important that resources at CFIA be used to slow the introduction and spread of SLF so we have time for science and pest control tool access to catch up.

The long term economic and environmental impacts from SLF are unknown, it is possible they may not be as serious. A heavy-handed approach to regulating SLF in its early stages could end up being more economically damaging to nursery growers than the damage the pest causes to nursery stock, grape growers and the Canadian environment.

The transportation sector – trains and railway corridors, trucking, leisure travel – are high risk pathways for spread and the directive regulates some of these (military vehicles and equipment, recreational, personal and commercial vehicles and equipment) but exempts them from any CFIA documentation requirements for moving from regulated areas to non-regulated areas. This is unfair to the nursery and log sectors who have no influence/ability to control SLF spread through those activities yet will be required to implement significant phytosanitary actions to prevent SLF spread through their own activities.

What is the long-term goal with SLF for CFIA? Once it is established in Canada, there needs to be a plan for how we live with the pest and balance the regulatory requirements on nursery growers with the ultimate risk SLF shows itself to be to the Canadian environment, economy and grape production.

Through our consultation with growers, it was very clearly stated that the regulatory response to detections of SLF in Canada needs to be clearly articulated prior to that detection and that every resource is available to ensure stop-ship orders do not occur for nursery stock in regulated areas.





**Canadian Nursery Landscape Association**  
*Association Canadienne des Pépiniéristes et des Paysagistes*

Growers were also very clear that they felt their sector was being unfairly regulated especially when compared to the high-risk sectors like transportation where there will be no regulations at all. Finally, once this pest is established in Canada, egg masses will be continually laid in deciduous forests in the regulated areas with no controls or regulation and nurseries surrounded by forests will need to control incoming populations from those unmanaged sites. Whether spotted lanternfly is regulated or not, nursery growers will continue to do their due diligence and high-quality production and IPM practices to ensure plants are shipped to their customers pest free.

CNLA is interested in continuing discussions on this and are available to answer any questions that arise from this response. I'd like to suggest that we organize a zoom conference meeting between CFIA and our grower members to continue those discussions.

Thank you for the opportunity to provide input to this consultation.

Sincerely,

Jamie Aalbers  
Growers' Sector Specialist, CNLA

cc. Stuart Gillies, Chairperson, CNLA Growers Canada Committee  
cc. Valerie Sikkema, Chairperson, CNLA Spotted Lanternfly Task Force  
cc. Victor Santacruz, Executive Director, CNLA

