



Canadian Nursery Landscape Association

Association Canadienne des Pépiniéristes et des Paysagistes

February 9, 2024

Re: Consultation on RMD-23-05: Expansion of the geographical boundaries of the areas of Canada regulated for box tree moth (*Cydalima perspectalis*)

Thank you for the opportunity to provide comments from the Canadian nursery sector on the most recent risk management document related to box tree moth. 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.

CNLA supports and is in favour of the recommended option proposed by CFIA – Option 2 – regulate all provinces east of Ontario (Quebec, New Brunswick, Nova Scotia, Prince Edward Island, and Newfoundland and Labrador).

The spread of BTM to provinces east of Ontario was indeed an unfortunate occurrence in 2023 and implementing Option 2 is the best long term approach to learning how to live with an endemic population of box tree moth in eastern Canada. However, given that spring sales of boxwood can commence as early as mid-April, it is critical the CFIA decides on and implements Option 2 as soon as possible. If CNLA can support the seamless and rapid transition to Option 2, please do not hesitate to contact me directly.

Sincerely,

Jamie Aalbers
Growers Sector Specialist

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

Canadian Food Inspection Agency
Policy and Programs Branch, Horticulture & Grains Section
cfia.horticulture.acia@canada.ca

February 9, 2024

RE: Consultation on RMD-23-05

Landscape Ontario represents ornamental nursery growers that have *Buxus* as a significant crop within their production inventory. Losses over the last few years have been serious, from a combination of lost sales (both domestically and exports to the USA), destruction of unwanted inventory, and a decline in the market price for boxwoods. Efforts by CFIA and CNLA to establish acceptable management strategies to facilitate trade are appreciated, however, we are still looking for opportunities to regain some of the market opportunities for current inventory as well as to anticipate our future production needs. Thank you for our opportunity to comment on this important issue.

The RMD-23-05 document proposes two options for expanding the regulated area for box tree moth (BTM): 1) regulate Québec, New Brunswick and Nova Scotia, and 2) regulate all eastern provinces. We agree with CFIA's recommendation for Option 2. Creating one encompassing shipping area will facilitate and simplify trade for many of our members that ship to multiple customers throughout Eastern Canada.

We encourage CFIA to make a decision on expanding the regulated area as soon as possible, ideally before April 1, 2024. Nursery sales to many customers are often determined months in advance and we are losing our window for additional (and needed) sales. Please reach out to us if you need additional information.

Sincerely,



Dr. Jeanine West

Grower Technical Analyst
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CC: Joe Salemi, Executive Director Landscape Ontario

CC: Jamie Aalbers, Growers Manager, CNLA

CC: Landscape Ontario Growers' Sector Group