

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

January 20, 2023

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

Thank you for the opportunity to comment on the CFIA directive D-22-04 regarding box tree moth (BTM). Boxwood plants (*Buxus* spp.) are extremely popular landscape plants and historically have been valuable crops with few pest issues. Sales of *Buxus* spp. from Ontario growers is in the range of tens of millions of dollars. Please refer to the table below for our comments related to the proposed regulatory requirements for boxwood plants.

5.3 CFIA-accepted systems approach	
Support	<ul style="list-style-type: none"> • Our sector supports the requirement for a systems-based approach for box tree moth (BTM). • Our sector is very pleased to see the inclusion of GCP, CNCP/USNCP, and Clean Plants as CFIA-recognized systems approach-based programs.
Concern	<ul style="list-style-type: none"> • The criteria for a systems approach (SA) program are not fully detailed within the directive. • The CFIA’s “preventative control plan” for <i>Anthonomus rubi</i> provided to selected facilities in lieu of a systems approach program did not appear to be even equivalent to GCP/CNCP program requirements. • Our sector is concerned that Canadian facilities on SA programs will be expected to do more than non-SA facilities to meet movement requirements. The industry members that participate in systems approach (SA) programs should be at an advantage for meeting domestic movement requirements – i.e., it should not be easier for a facility that is not on a SA program to ship host plants.
Solution	<ul style="list-style-type: none"> • “Preventative control plans” developed by CFIA or NPPOs from other countries must at least meet, and should exceed, the requirements that facilities participating in GCP/CNCP/Clean Plants must meet. • A standardized criteria for non-SA facilities is requested to avoid inconsistencies.

6.0 Specific requirements	
Support	<ul style="list-style-type: none"> • We support the consistency between Canadian domestic movement and import requirements
Concern	<ul style="list-style-type: none"> • The lack of opportunity for movement of boxwood plants from regulated areas into British Columbia is concerning. • Other directives (e.g., D-96-15, D-99-04) include options for movement of host plants and fruit from regulated areas into BC.

	<ul style="list-style-type: none"> We recognize the challenges associated with BTM's particular biology (overwinters within the foliage, is difficult to observe/scout for at all times of year) as well as the natural isolation of BC (presence of the pest BC will be due to trade/human activity). We believe that host plants produced under a systems approach program within structures with suitable pest exclusion barriers are free of BTM and would not pose a risk to non-infested areas (including BC). Long-term monitoring for the pest will provide evidence that pest exclusion barriers are successful. We understand that the consistency in approach between US and Canadian movement is a benefit, and a model of how regulations should be developed, and in turn, allowing regulated areas within Canada to ship to BC would also mean that other jurisdictions that are known to be infested would also be eligible for similar trade opportunities with BC.
Solution	<ul style="list-style-type: none"> Provide the caveat in sections 6.1.2, 6.1.5, and 6.2.2 that facilities or NPPOs may apply to CFIA for a pilot SA-based program where, if certain conditions are met (i.e., establish pest free production sites), movement of plants from BTM regulated areas into BC may be considered.

Appendix 1 Pest Module	
Support	<ul style="list-style-type: none"> We support the concept of a pest module to detail appropriate phytosanitary measures taken by a facility to mitigate pest introduction and spread.
Section A.4.	
Concerns	<ul style="list-style-type: none"> The risk assessment (Section A.4.) of the facility is vague, and the link between identified risks and actual measures a farm takes to address those risks is unclear.
Solution	<ul style="list-style-type: none"> Improve the language in Section A.4. to clarify how a facility would identify their risks and provide guidance on how they could determine which measures to apply.
Section A.8.	
Concerns	<ul style="list-style-type: none"> Section A.8. of the module (Emergency Planning) notes that if a pest is found within a pest exclusion 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.
Solution	<ul style="list-style-type: none"> Consider removing the requirement for notification from the pest module except for BTM finds outside of the regulated area.

Again, we thank you for inviting our feedback and considering our comments and for the continued collaborative approach between CFIA and our industry. We encourage you to reach out for clarification of any of the points mentioned herein.

Sincerely,



Dr. Jeanine West

Grower Technical Analyst
 Landscape Ontario Horticultural Trades Association
 jwest@landscapeontario.com

CC: Joe Salemi, Executive Director LO
 CC: Jamie Aalbers, Growers Sector Specialist, CNLA
 CC: Landscape Ontario Growers' Industry Sectors Group Board of Directors