

Canadian Food Inspection Agency
Policy and Programs Branch, Horticulture & Grains Section
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RE: Consultation on Proposed Directives D-22-01 and D-22-02

Landscape Ontario represents ornamental nursery growers as part of our greater mandate to support the entire green infrastructure sector in Ontario. Fruit tree stock and *Prunus* species production appears to represent a shrinking component of our sector's market for some growers, although there still are a few growers active in this space. Within the regulated articles genera (*Malus*, *Prunus*, *Chaenomeles*, *Cydonia* and *Pyrus*) there are valued ornamental plants, and critical understock for tree production is imported from the United States.

It is unclear if there are any changes to the importation requirements for fruit tree stock in D-22-01, specifically: are there any changes to the virus certification program accepted by CFIA? Any changes there may impact the supply chain.

The primary concern from growers in our sector is the continued access to US-sourced understock and tree liners. We note the addition of *Prunus texana* and *Prunus ussuriensis* in Annex 2 of D-22-02 (susceptible), and the re-categorization of *P. incana* to the non-susceptible list (Annex 3). At this time, we do not have any concerns with these changes.

In summary, as our sector has limited requirements for propagation of affected nursery stock within the regulated area, and as long as the supply chain for understock is not impacted, we do not have any particular concerns with the two proposed directives.

Sincerely,



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CC: Jamie Aalbers, Growers Manager, CNLA
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