



June 17, 2011

Donna Wales  
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Ministry of Natural Resources  
Policy Division, Biodiversity Branch  
Biodiversity Policy and Program Development Section  
300 Water Street, Floor 2  
Robinson Place North Tower  
Peterborough, ON K9J 8M5

**Re: Ontario Invasive Species Strategic Plan (OISSP) EBR # 011-2884**

Dear Ms. Wales:

Thank you for the opportunity to provide comments regarding the Ministry of Natural Resources' (MNR) "Ontario Invasive Species Strategic Plan (OISSP)", which was posted for public comment on the Environmental Registry (EBR #011-2884). The following comments are submitted for your consideration by Conservation Ontario (CO), which is the network of Ontario's 36 Conservation Authorities (CAs).

Conservation Ontario is pleased that the Province is responding to the threat of invasive species and appreciates the opportunity to comment on this plan. Conservation Authorities are among the largest landowners in southern Ontario, and many of these lands are being negatively impacted by invasive alien species. As a result, CAs have a strong interest in this issue, and many have been actively involved in invasive species control. CAs through Conservation Ontario are also represented on the Board of the Ontario Invasive Plant Council (OIPC).

### **General Comments**

We recognize that the main intent of the OISSP is to guide government response to invasive species and to clarify responsibilities of provincial agencies in this regard. We appreciate that the tactics outlined in this document include cooperating with CAs in monitoring efforts. It is important to note that CAs also have a pivotal role in restoration, stewardship, communications and education. Working through the OIPC, Conservation Authorities could be instrumental in the development of approaches for the prevention and control of invasive species. Conservation Authorities are already directly involved in the implementation of these strategies. We recommend that this document be updated to include the wide range of roles that Conservation Authorities can contribute to, particularly in the section on "management measures", "communications" and "education".

The Ontario Invasive Species Strategic Plan describes the use of Lake-wide Management Plans completed by the Great Lakes Fishery Commission and identifies as a tactic that the responsible ministries work through the

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existing Great Lakes committees to better address aquatic invasive species issues. Many Conservation Authorities have completed watershed-based fisheries management plans; some in partnership with the Ministry of Natural Resources. These management plans also are an important resource in Ontario's efforts to adapt to and manage invasive species and should be included in this document.

This strategic plan includes a section on aquatic invasive species, but no specific section on terrestrial species. It is recommended that this document place equal emphasis on terrestrial invasives by including a similar section to that of aquatic species. The Ontario Invasive Plant Council may be a helpful resource for identifying the information which should be included in this document.

Conservation Ontario agrees with the assessment that the "actions and tactics identified in this strategy are high level and strategic", and supports the recommendations that an annual implementation plan be created. One challenge with that plan will be to prioritize the items given limited resources. Conservation Ontario encourages the MNR to consult and engage with CA staff whose resource management and watershed stewardship expertise may help to identify the priority areas for work to be completed. While the annual implementation plans will help bring focus to this document, it is recommended that timelines be included in the OISSP for the completion of the review of existing legislation and policy gaps. General timelines around the development of rapid response plans with ideas on how to secure appropriate funding to implement these plans should be included.

Some concern was raised that the tactics outlined in this document did not directly translate into action items. In the annual implementation plans or in this document it would be helpful to set targets to make the goals more measurable and achievable. Clarifying the roles of the various groups working on this issue (Ministry of Natural Resources, Ontario Invasive Plant Council, Ontario Federation of Anglers and Hunters, Invasive Species Centre and Invasive Species Research Centre, Conservation Authorities and the other Ministries) would also assist in completing targeted tasks. Including a tactic of developing a funding mechanism for on the ground control of invasive species would help to bridge the gap from strategy to action.

### **Specific Comments**

#### *Benefits of Action (p. 9)*

Including a concluding paragraph would be helpful to bring the ideas together expressed in the research and monitoring, management, and education and awareness sections.

#### *Objectives and Goals (p. 13)*

This section indicates that the "actions/tactics were categorized under one of six provincial activities" but only lists five. It appears that the 6<sup>th</sup> activity area has been inadvertently added to the 5<sup>th</sup>.

#### *Scope (p. 15)*

The OISSP indicates that human health issues will not be dealt with in this plan. While it is understandable that to be effective the plan must be scoped, an opportunity to make this issue more "mainstream" may be lost through removing the link to human health. Even if this plan chooses not to include the human health issue, providing additional information on the other programs which address these links may be helpful by increasing public understanding.

#### *Monitoring (p. 29)*

This section speaks to monitoring geographic areas at high risk for invasives. It is suggested that this section be augmented by suggesting that high quality habitats should also be monitored to ensure that invasive species are caught and eradicated quickly.

*Development of Management Measures (p. 33)*

This section should be made more robust by tying in the information about the eradication methods referred to in the Monitoring section. Currently this section appears to be making reference to signage and education only, whereas additional actions are likely contained within the response plans.

Under the tactics section (p. 35), it indicates that OMNR will work to “reduce disturbance in natural areas and natural corridors”. This document should consider the impact of roads being a major vector for invasive species introduction and include tactics to minimize their impact.

*Funding and Resources*

While it is acknowledged that there is information about funding in the “Monitoring and Science” section, including a separate section on funding and resources would be helpful in terms of moving this strategy into implementation. This document should identify that resources will be allocated for implementation of the tactics.

Thank you for this opportunity to provide comment on the draft “Ontario Invasive Species Strategic Plan, 2011”. Should you have any questions regarding the above comments, please contact me at (905) 895-0716 extension 228.

Sincerely,



Leslie Rich  
Policy and Planning Officer

c.c. CA CAOs/GMs