



September 10, 2013  
Donna Wales  
Policy Advisor, Ministry of Natural Resources  
Policy Division, Biodiversity Branch  
300 Water Street Floor 2  
Robinson Place North Tower  
Peterborough, Ontario K9J 8M5

Dear Ms. Wales;

**Re: Conservation Ontario's Comments on the Invasive Species Discussion Paper (EBR # 011-9780)**

Thank you for the opportunity to provide comments on the Ministry of Natural Resources (MNR) Invasive Species Discussion paper (EBR #011-9780). This discussion paper is an important step in improving Ontario's response to invasive species in Ontario and MNR is to be commended on its development. The following comments are provided in response to the questions posed in the discussion paper.

***General Comments***

It is not clear how this discussion paper fits with other initiatives currently underway to address invasive species in Ontario, for example how it supports all of the actions and tactics outlined in the Ontario Invasive Species Strategic Plan (OISSP). The paper proposes many actions that will contribute to achieving the strategy goals to improve response and management but greater emphasis is needed on actions to achieve goals such as improved prevention and detection. The paper does make reference to Ontario's participation on the bi-national Alien Invasive Species Task Force and it is recommended that MNR continue to coordinate actions with new initiatives such as the implementation of Annex 6 of the Great Lakes Water Quality Agreement.

The paper identifies the need to implement legislation and regulations to enforce improved controls in the future. Development and enforcement of any new regulations will require careful consideration of the funding necessary to effectively monitor and enforce regulations or best management practices. In addition, it is recommended that consideration be given to potential implications of such regulations on various stakeholders (e.g. Agriculture). Furthermore, it is recommended that if regulations are being considered they be incorporated within existing mechanisms/ legislation (e.g. Fish and Wildlife Conservation Act).

The definition on page 10 for invasive species states that "Ontario's definition of invasive species could include native species if that species has been introduced by human activities into areas in Ontario beyond its natural range." It is unclear whether native species means a species native to Ontario or to Canada. The definition could be revised to read "Ontario's definition of invasive species could include species native to Ontario if that species has been introduced by human activities into new areas of the

province beyond its natural range.” The second part of the definition of an invasive species states that “a species may be considered invasive if its introduction or spread can be linked to our changing climate.” Many species are already expanding their ranges due to climate change; however biologists would not consider them invasive. The issue arises only if they are negatively affecting biodiversity, the economy or society. To clarify this, it is suggested that this bullet point be removed.

Discussion Paper Questions:

**1. The discussion paper identifies that invasive species are a growing threat to Ontario's economy and biodiversity. Do you agree with this statement? If so, what additional measures do you feel need to be taken?**

Invasive species do pose a growing threat to Ontario economy and native biodiversity. The discussion paper proposes a number of measures to enhance the MNR's management framework that would lead to a greatly improved response to invasive species in Ontario. However, there are some additional measures that need to be taken that are not discussed.

Firstly, it would be helpful to investigate and then provide more information to the public about the impacts of both terrestrial and aquatic invasive species on Ontario's economy, to communicate the importance of this issue and to help build support for management actions.

In addition, the discussion paper mentions that enhancements to the invasive species management framework would be guided by the use of a risk based approach. It is important that the framework also be guided by an ecosystem based approach. Management actions intended to control a particular invasive species can often have other unintended effects; therefore making decisions based on an understanding of the potential impacts to the entire ecosystem is more cost-effective and efficient. This is especially important for urban and urbanizing areas where invasive management may take different forms, since the goal of management may not be the same as in protected areas like nature reserves. As Ontario becomes increasingly urbanized, it is imperative to strategically rethink invasive species management to make an effective impact.

This paper acknowledges the role that legislation, regulations and policies have played in controlling invasive species but does not consider that the planning process can also play a role. For example, direction to municipalities, encouraging the incorporation of invasive species lists into their Official Plans could be provided through the provincial policy statement. This would provide some assurance that invasive plants are not included on official plant lists of municipalities.

**2. This discussion paper suggests using a risk-based approach to list species. Risk assessments would use the best available scientific information to estimate the likelihood of an invasive species being introduced, and to evaluate the potential consequences of introduction. Do you agree with this approach? If not, what approach should be considered?**

A risk-based approach is a sound and useful approach that allows for prioritization of actions to maximize the use of limited resources. However it is important to recognize that there are number of species that may appear to be “lower risk” but can have cumulative negative impacts on biodiversity and species at risk. Any risk based approach used will need to incorporate potential cumulative effects. In addition, risk varies depending on the landscape context (e.g. rural verses urban) and scale (both spatial and temporal). As a result, priority invasive species will vary depending on the region or watershed. To be useful to managers in Ontario, risk assessments will need to be done at a scale that takes these regional differences into account. Ontario's risk assessment process will also need to be

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coordinated nationally and bi-nationally, as noted previously, with other agencies that are currently engaged in risk assessment (i.e. Fisheries and Oceans Canada, Canadian Food Inspection Agency).

**3. The discussion paper suggests assigning listed species to categories. Suggested categories include: a category targeting prevention and eradication, and a category targeting prevention of spread and control. Do you agree with categorizing species? What additional categories should be considered?**

It makes sense to categorize species at the provincial level to assist with prioritization for outreach and control efforts. The categories presented are a good broad based starting point however; a wider range of categories needs to be considered to take into account the fact that species priorities differ by region. Policy tools should be linked to these categories to ensure appropriate actions can be taken by responsible authorities. It is suggested that the 2002 “Invasive Exotic Species Ranking for Southern Ontario” prepared by Urban Forest Associates Inc. and available on the Ontario Society for Ecological Restoration website, be considered as a starting point for developing more detailed categories. This document categorizes invasive plants based on their observed effects and habitat range and is currently being updated.

**4. The discussion paper acknowledges there are many non-native species in Ontario that are not a threat, and that provide significant benefits to Ontarians and suggests listing allowed species. Do you agree with this approach? Can you explain how this approach would provide an overall benefit to Ontarians?**

The paper does not clearly explain how creating a provincial list of allowed species would be beneficial or effective. Presumably if a species is not listed as being invasive it would be allowed. Considering the challenges of developing and updating a comprehensive list of all allowed species it would be more cost effective to focus on developing the list of invasive species. In addition, there are many cases where there are alternative native species that can be used achieve similar recreational, economic and food values to those that the non-native species currently provide. Providing a listing of allowed non-native species might encourage their use, thereby discouraging users from shifting to native species that can provide the added benefit of contributing to increasing Ontario’s biodiversity.

**6. The discussion paper references the use of management plans for high-risk species. Are there specific cases where adherence to the control measures listed in a management plan may reduce the level of risk associated with the proposed control/eradication measures and improve the likelihood of eradication?**

Adherence to control measures listed in a management plan can improve the likelihood of eradication. Management plans need to strike a balance between recommending species-specific best management practices versus restoration actions that make sense for a given site. For example, a few stems of dog strangling vine at a nature reserve should be aggressively removed (eradication likely), while large established populations of it in an urbanized environment should not be targeted for removal as the effort would not likely be successful. The exception to this would be if a new more effective biological control program could be implemented.

**7. The threats posed by invasive species are of such societal significance that no one government or agency can solely be responsible to prevent their spread. The discussion paper suggests that MNR should expand its partnerships with a broader suite of organizations. Do you feel this approach is appropriate?**

A multi-pronged approach including education and outreach, monitoring and management and legislation is required to be successful in preventing the spread of invasive species. In order to implement this approach it will be imperative for the MNR to expand its engagement with a broader suite of partners, especially at the local level. In doing so, it will be most effective to expand upon

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partnerships with existing coordinating organizations such as the Ontario Invasive Plant Council. The development of an Invasive Species Management Framework should be a collaborative effort involving federal, provincial and local agencies. It is recommended that the MNR play a key leadership role in coordinating and supporting the efforts of its partners in Ontario. Currently there are limited local resources available to support control of invasive species. In particular, most municipalities do not have the financial or technical resources needed to support the development of invasive species management plans. Conservation Authorities expertise and resources could be considered as a means to leverage MNR support for these types of municipal planning and management efforts in the future.

**8. New enabling tools are suggested, including the need to enable the listing of species by other agencies, and new tools to help enable control. What specific enabling provisions should be considered?**

There are a variety of enabling tools that could be employed. It is recommended that MNR and its partners focus on improving communications and sharing of information. There is an urgent need for readily accessible information that can assist the public in identifying and reporting known and new invasive species. While the appointment of invasive control officers or inspectors may be considered, the establishment of local Invasive Control Committees and improved sharing of information would be an important priority to facilitate community and stakeholder engagement towards control and management. It is also recommended that prevention and monitoring strategies to support the emergency listing of species be developed. There are various mapping tools that can be citizen science driven or expert driven that could be considered. Other ideas include the creation of mobile applications for the public to access information, make informed decisions when purchasing, and report sightings.

Enabling tools to allow other agencies to implement priority actions (e.g. removal orders, permission to enter to eradicate or to use herbicides/pesticides) should be considered. Finally, as mentioned in response to question 1 above, provincial guidance could be considered to assist municipalities in incorporating invasive species into local planning.

Once again, thank you for the opportunity to provide comments on the MNR's Invasive Species Discussion paper. Overall Conservation Ontario is supportive of this initiative to improve Ontario's response to invasive species. The MNR is encouraged to move forward with its proposal to take on a strong leadership role in leveraging existing expertise and coordinating and supporting the efforts of partners such as Conservation Authorities in order to effectively manage invasive species. Should you have any questions about this letter, please contact Samantha Dupre Policy and Planning Officer (ext 228) or myself (ext. 224).

Sincerely,



Jo-Anne RZadki MSc.  
Watershed Stewardship Coordinator