



February 21, 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 "Protecting Ontario's Fisheries: Discussion Paper on Tougher Measures to Prevent an Asian Carp Invasion" (EBR #011-7849)

Thank you for the opportunity to provide comments on the policy paper "Protecting Ontario's Fisheries: Discussion Paper on Tougher Measures to Prevent an Asian Carp Invasion" (EBR #011-7849). Overall, Conservation Ontario (CO) found that this document does an excellent job of detailing the issues related to the invasion of Asian Carp in the Great Lakes. Conservation Ontario is strongly in favour of preventing Asian Carp access to the Great Lakes and their watersheds and supports increased efforts to achieve this objective. CO's comments are provided primarily in response to the questions posed in the Discussion Paper.

General Comments

The Discussion Paper describes the Ontario Asian Carp Response Plan as a living document that will evolve as the understanding of Asian Carp biology, ecology, control and management improves. The paper also describes a variety of detection and response efforts that are currently being implemented to prevent the introduction and/or establishment of Asian Carp to the Great Lakes. However, it does not explicitly indicate the need for these efforts to be continued in the long term. This reality needs to be clearly stated. In order to achieve this long term commitment the Ministry of Natural Resources (MNR) is encouraged to develop partnerships with other agencies such as Conservation Authorities (CAs) in order to share resources and leverage expertise. These partnerships will be especially important in increasing capacity for monitoring and enforcement of policies and regulations over the long term. The Discussion Paper mentions several occurrences of Asian Carp in U.S waters. It may also be relevant to mention occurrences of Asian Carp in Ontario (e.g. Grass Carp found in the Don River in 2003 by Toronto and Region Conservation Authority).

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Conservation Ontario supports taking a risk-based approach to surveillance and prevention efforts. This discussion paper describes the risk-based surveillance efforts of the Ministry of Natural Resources and other partner agencies. MNR should consider the development of formal partnerships with Conservation Authorities in order to best leverage resources when conducting surveillance activities. Many CAs already perform routine aquatic monitoring and through partnerships with the MNR they could contribute to the early detection of Asian Carp.

RESPONSES TO QUESTIONS

- 1. This paper proposes that current legislation be amended from “prohibit live possession” to “prohibit unless dead and eviscerated”. Do you agree that evisceration is an appropriate and workable way to prevent Asian carp from entering the Great Lakes?**

Overall, Conservation Ontario is supportive of changing the current legislation from “prohibit live possession” to “prohibit unless dead and eviscerated” as an appropriate and workable measure to ensure that Asian Carp do not access the Great Lakes from Ontario waters.

However, it has been suggested that changing current legislation in this way may prompt increases in illegal shipments because some individuals/groups view the purchase or display of live specimens as very important. Therefore increased efforts may be needed to prevent, monitor for, and anticipate illegal shipments.

- 2. Can you think of any other ways of preventing live Asian carp from crossing the Ontario border? Please describe any other ideas you may have.**

Other ways of preventing live Asian carp from crossing the Ontario border include:

Increased monitoring and enforcement: Routine inspections of the live wells housed in recreational boating craft crossing into Canadian waters, Ontario fish markets and target restaurants are also needed. Again, strategic investment and partnerships with other agencies will be instrumental in achieving this. For example, MNR Conservation officers could partner with local public health authorities in conducting inspections of fish markets and restaurants. The new regulation may force live carp prices up. The live (although illegal) market should be monitored to ensure fines are a true deterrent, rather than becoming an "operating expense".

Supporting U.S Efforts: Conservation Ontario recognizes the significant threat posed by Asian Carp range expansion into the Great Lakes. Consequently, Conservation Ontario supports the MNR in efforts to coordinate and support U.S jurisdictions in efforts to isolate the Great Lakes from the Mississippi drainage basin.

- 3. How can the Ministry of Natural Resources reach more Ontarians with information about Asian carp?**

The Ministry of Natural Resource can reach more Ontarians about the threat of Asian Carp by utilizing the media, social media and targeted outreach campaigns to inform the general public. The paper discusses MNR efforts to inform users of the resources (anglers, boaters, etc.) about the threat. Ontario could also consider including mandatory training for fishing license applicants, similar to firearm

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certification courses for hunters.

In addition, a targeted approach to inform community groups and businesses that would typically be buying/selling these species as food should be employed. For these community groups materials in languages other than English will be required. Consultation with leaders in ethnic communities should be conducted in order to find out the best approaches to connect with non-English speaking residents. It is also recommended that MNR work closely with the aquaculture trade to further educate members in Ontario about the threat of Asian Carp and the need to prevent them from entering Ontario from aquaculture suppliers in the U.S. MNR is also encouraged to target plant nursery and baitfish suppliers who may also sell pond fish during periods of the year.

4. What roles do you see for Aboriginal communities, business, environmental organizations, or other stakeholders in preventing Asian carp and other invasive species from arriving and establishing in Ontario?

Further to the general comments made above, MNR should investigate establishing partnerships with Conservation Authorities to assist in preventing Asian Carp and other invasive species from arriving and establishing in Ontario. CAs could assist in providing monitoring services such as identification and reporting of live or dead specimens of Asian Carp found during regular field work activities and some CAs may also be able to collaborate on the MNR's e-DNA detection program. Provision of existing MNR outreach and identification materials to CAs would help ensure the education of CA staff is maximized and transfer of that material to watershed stakeholders could be facilitated through regular outreach and education activities.

Everybody involved in using and/or protecting water resources should play an active role in preventing the spread of Asian Carp in Ontario waters. The largest role to play in preventing the spread of these species is awareness and all groups (including Aboriginal communities, business, and environmental organizations) can participate in informing the public and themselves on the dangers associated with their spread. It is especially important for businesses (such as aquaculture companies and fish markets) to recognize the legislation and abide by it. MNR can play a fundamental role in coordinating efforts, enforcing legislation and educating key stakeholders.

Once again, thank you for the opportunity to provide comment on "Protecting Ontario's Fisheries: Discussion Paper on Tougher Measures to Prevent an Asian Carp Invasion". Overall, Conservation Ontario is strongly supportive of the province's initiative to prevent Asian Carp access to the Great Lakes. In order to achieve this long term commitment the MNR is encouraged to take a strong leadership role through leveraging expertise, coordinating and sharing resources, and potentially through the development of partnerships with other agencies, including Conservation Authorities. Conservation Ontario looks forward to continuing to support the province's important work in preventing the introduction and/or establishment of Asian Carp in the Great Lakes and their watersheds.

Should you have any questions about this letter, please contact me at extension 228.

Sincerely,

Samantha Dupré
Policy and Planning Officer

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