



GICHI OZHIBI'IGE OGAAMIC
ADMINISTRATIVE OFFICE

To Whom It May Concern,

Please find below a list of comments submitted by Grand Council Treaty #3 to provide information on the cultural, spiritual, social, ecological, and economic impacts and that the proposed 13 species and one carrier will have on Treaty #3 lands, waters, and people.

1. Q: Do you agree/disagree that we should review the identified species and carrier for regulation under the Invasive Species Act 2015?

A: Yes, Grand Council Treaty #3 agrees that the Ministry of Natural Resources and Forestry (MNR) should review all of the identified species and carrier for regulation as these species all have the potential to increase in population and disrupt sensitive ecosystems which will impact Treaty #3 member's way of life in a cultural, spiritual, recreational, and economic sense. The introduction of invasive species and the subsequent interference to Treaty #3 traditional activities affects our members Inherent and Treaty Rights to by restricting access to hunting, fishing, and gathering on Treaty #3 lands and waters. As such, there should always be a review period for new invasive species and carriers to allow the Invasive Species Act to act in its fullest to prevent further spread of new invasive species and reduce impacts of carriers, which will in turn allow Treaty #3 members to better exercise their inherent rights.

2. Q: Do you have information, including personal experiences, that would help us as this review proceeds?

A: Yes, in relation to overland movement of watercrafts as a carrier. Treaty #3 territory is located in Northwestern Ontario which is home to thousands of lakes including Lake of the Woods. Hundreds of thousands of tourists also visit it on a yearly basis. Many of these tourists come with their own boats for fishing, camping, etc., and take their boats to multiple different lakes. Unfortunately, some lakes in Treaty #3 have established populations of aquatic invasive species such as spiny water flea, rust crayfish, and as of 2018/2019 zebra mussels. Ultimately, many tourists and locals bring their boat to different lakes over the summer and unknowingly spread aquatic invasive species to new lakes. The current education methods of dealing with overland carriers such as boats are not strong enough or strict enough to prevent this as current legislation can be strengthened to ensure better practices. Grand Council would like to see stronger methods in place such as mandatory boat cleaning stations and fines in place if boaters are caught on the lake with uncleaned boats.

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3. Q: Would the regulation of one or more of the proposed species or carrier have a positive or negative impact on you or your community personally, recreationally, or economically?

A: If regulations were to be imposed there would be positive impacts for the growth and harvest of wild rice, improved sustainability for commercial and recreational fisheries in Treaty #3, and less transfer of already established aquatic invasive species across Treaty #3 Rivers and Lakes.

Wild Rice: Wild rice is important to Treaty #3 members as it is a main traditional food source for Treaty #3 First Nations while other First Nations also harvest it for economic reasons. Currently, there are a number of identified sources that are negatively affecting the growth and traditional harvest of wild rice in Treaty #3 waters. One of those being the already established invasive rusty crayfish. If the marbled crayfish and red swamp crayfish were to become established in Treaty #3 waters, they too would likely use wild rice plants as a food source and further increase the loss of wild rice in Treaty #3. Invasive hybrid-cattails in Treaty #3 have also been proven to outcompete wild rice and Grand Council is concerned that European frog-bit, yellow floating heart, and fanwort also have the potential to become established and outcompete native wild rice plants and further impact their population and growth.

Fisheries: Lake of the Woods in Treaty #3 territory is a premier-fishing destination for recreational fishers and also has established commercial fisheries for walleye. Grand Council is concerned for the potential for Prussian carp to establish here (and to a lesser extent worried for Tench). If the Prussian carp were to establish and thrive, it could have drastic negative impacts on local fish populations. Local fish populations such as walleye are already under stress from established invasive species such as spiny water fleas, and over fishing. The Prussian carp affecting fisheries would affect walleye and other fish as a traditional food source for Treaty #3 members and harm Lake of the Woods reputation for world-class fishing. The harm to reputation would mean less fishing related tourism and less revenue for Treaty #3 fishing guides and baitfish harvesters.

Preventing Further Spread of Aquatic Invasive Species: Northwestern Ontario, where Treaty #3 is predominately located, is home to thousands of lakes many of which are often visited for recreational boating purposes. Unfortunately, there are already established aquatic invasive species populations of rusty crayfish, spiny water fleas in Northwestern Ontario and well established populations of zebra mussels in neighboring Manitoba. As it stands now the current measures of public education have not been enough to prevent the spread of these invasive species to new waterbodies in Treaty #3 territory. A great example of this is zebra mussels. Before 2018, there were no known cases of zebra mussels in Treaty #3 waters but in the past two years' zebra mussel larvae have been identified in Shoal Lake and the southern section of Lake of the Woods. Based on this there would be a clear and large benefit to MNRF implementing stricter measures of overland movement of watercraft within Ontario. This would help prevent the spread of already established aquatic invasive species to new lakes and help prevent new aquatic invasive species from establishment in Treaty #3 territory.



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4. Q: What rules do you recommend be applied to some or all of the identified species or carrier?
See sections 6, 7, or 8 of the Invasive Species Act, 2015 for more information.

A: Grand Council recommends that all rules from the Invasive Species Act, 2015 be applied to the identified species and carriers. If all rules are not applied there is a greater chance for the spread and establishment of the new invasive species in Treaty #3 waters and all other Canadian waters.

5. Should we consider exceptions to the prohibitions during the development of the regulatory proposal (e.g allowing the import of the species provided individuals are dead)?

A: There should be no exceptions made to the prohibitions during the development of the regulatory proposal. If there is leniency in this, it allows for a greater chance of the new invasive species to spread and establish new populations in Treaty #3 waters and all other Canadian waters.

For more information please feel free to reach out to the Territorial Planning Unit through Chris Herc, Environmental Monitoring Coordinator at environment.monitor@treaty3.ca.

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