



April 9, 2020

Biodiversity Coordinator
MNRF - Biodiversity Section
300 Water Street
5th Floor, North tower
Peterborough, ON
K9J 3C7.

Re: Seeking information on invasive species and carriers under the Ontario Invasive Species Act, 2015 (ERO #019-1162)

To Whom It May Concern:

Please find Credit Valley Conservation (CVC) comments on the proposal seeking information on invasive species and carriers under the Ontario Invasive Species Act. CVC is supportive of the recommendations of the proposal, however, CVC also has a number of suggestions that we feel would benefit invasive species management in the province.

General Comments

- CVC feels that due to concerns about additional species being sold through the horticultural trade, other terrestrial species should be included/considered for regulation. CVC suggests Japanese Stiltgrass (*Microstegium vimineum*), Japanese Chaff Flower (*Achyranthes japonica*), Norway Maple (*Acer platanoides*) be considered and changing the current restricted species Phragmites (*Phragmites australis ssp. australis*), Japanese Knotweed (*Reynoutria japonica*), and the dog strangling vine species (*Vincetoxicum nigrum* and *rossicum*) to prohibited.
- The development of regulations is one step in controlling the spread of invasive species, however, regulations also need to be enforced and outreach/education needs to be implemented. CVC recommends that (1) additional funds be provided to MNRF to help in enforcement of existing and proposed regulations (e.g. could include the hiring of new Conservation Officers with a focus on invasive species, the establishment of watercraft cleaning stations or the development and staffing of roadside watercraft check stations) and (2) the reinstatement of provincial funding cut in 2019 to numerous NGOs and agencies involved in invasive species programs.

Specific Comments

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

- CVC agrees that these species and the carrier should be reviewed. Of particular importance to CVC are Marbled Crayfish, Tench, Yellow Floating Heart, knotweed spp. and wild pigs. Species on

the proposed regulation list that are currently not found in Ontario should also be given priority for regulation.

- CVC also agrees that the carrier should be reviewed for regulation.

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

- CVC can provide data on locations where these species have been found in our watershed to contribute to the knowledge of current distribution of these species.
- CVC has been involved with numerous control and eradication projects for a variety of invasive species and is aware of how much time and effort it takes to fully eradicate an established species. Preventing establishment through regulation is a preferred approach to eradication or long-term control.
- Where infestations of knotweed sp. and Yellow Floating Heart that are not being managed, CVC recommends increased legislative responsibilities of responsible agency or landowner to ensure those species are managed and eradicated.

Question 3. Would the regulation of one or more of the proposed species or carrier have a positive or negative economic impact on you or your business?

- The regulation of the species would have positive impact on CVC's business as decreasing invasive species in watershed benefits our control efforts and the ecological integrity of the natural heritage system.
- The regulation of the carrier would incur additional costs as CVC would need to set up and manage infrastructure to clean watercraft at CVC Conservation Areas. Overall, though, the benefits prevail in keeping invasive species out of the watershed.

Question 4. What rules do you recommend be applied to some or all the identified species or carrier?

- Overall, CVC recommends no sales or use of invasive species as bait and species should be listed as prohibited, as restricting a species just results in education and not actual control
- The spread of many of these species is promoted through recreational boating and as such, CVC recommends that there should be mandatory watercraft and trailer cleaning to help reduce the spread of the proposed species
- Marbled Crayfish
 - CVC recommends live importation should be prohibited since they can clone themselves. Additionally, the release of existing individuals should be prohibited
- Tench
 - If there is a market for them as food, CVC recommends Tench could be imported dead-only but if there is no market as food, importation should be prohibited
 - Any angled individuals must be killed and should be prohibited
- New Zealand Mud Snail
 - CVC recommends prohibiting importation
 - CVC recommends that there should be ballast water exchange at sea or chemical treatment for shipping in the Great Lakes system only
- European Frog-bit
 - CVC recommends that it be prohibited in the nursery or aquarium trades and that release into waterbodies be prohibited
- Yellow Floating Heart

- CVC recommends that it be prohibited in nursery or aquarium trades and that release into waterbodies is also prohibited
- Prussian Carp
 - If there is a market for them as food, CVC recommends the importation of dead, cleaned fish only
 - CVC recommends that it also be prohibited from the aquarium trade
 - CVC recommends prohibited release into waterbodies and it must be killed if caught
- Red swamp crayfish
 - CVC recommends the province advocate for the separation of the Mississippi and Great Lakes drainages to prevent this species (and Asian Carp) from moving into the Great Lakes
 - CVC recommends the prohibition of the importation of live specimens, prohibition from aquarium trade and the prohibition from release of existing individuals into waterbodies and/or watercourses
- Fanwort
 - CVC recommends the prohibition from aquarium trade and nurseries and a prohibition on release of existing plants into waterbodies
- Bohemian, Giant and Himalayan Knotweeds
 - CVC recommends prohibiting the use and/or propagation in nurseries
 - These species should be a high priority for removal along with Japanese Knotweed, since they are generally controllable at this point in time
 - CVC recommends including all species of knotweed (i.e. add Japanese Knotweed to the list) since knotweed species can be confused with Japanese Knotweed and it is currently one of the worst terrestrial/wetland invasive species to manage
- Mountain Pine Beetle
 - CVC recommends the prohibition on the importation of firewood into Ontario
- Wild pigs
 - CVC recommends the prohibition on release outside of a secure farming operation and transparent accounting (i.e. accounting for all individuals) for pigs in farming operations
 - CVC also recommends an open season to kill any pigs in the wild regardless of origin, sex and age

Question 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)?

- CVC is supportive of an exception if the individual is dead and/or is being used for educational purposes

Carrier – Overland Movement of Watercraft

- CVC thinks that the province should do more than education for limiting movement of invasive species from waterbody to waterbody and as such, CVC recommends the mandatory cleaning of boat bottoms, trailers, draining and/or flushing of live wells and bilges with chlorinated water or bleaching of surfaces and proper disposal of washwater and debris from all waterbodies known or believed/likely to have invasive species that could be transported on boats/trailers. This should include sailboats, canoes, kayaks, paddleboards etc. in addition to powered watercraft and jet skis
- The province should consider develop watercraft inspection stations similar to those in Alberta

- If mandatory cleaning is not preferred, CVC suggests establishing boat movement zones (similar to how baitfish are proposed to be managed) that would allow boats and trailers within the zone to move from one waterbody to other with relative ease but would require additional cleaning/decontamination to move from one zone to another. The zones may not match those proposed in the provincial bait management strategy since some of proposed zones allow movement across large distances and across multiple watersheds

Please feel free to contact me at (905) 670-1615 x502 or by email at jon.clayton@cvc.ca if you have any questions or require clarification.

Yours sincerely,

A handwritten signature in blue ink that reads "J. Clayton".

Jon Clayton
Aquatic Ecologist

CC: Dawn Renfrew (CVC)
Freyja Whitten (CVC)
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