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***Invasive Species Centre Comments on Environmental Registry of Ontario #019-3465, Regulating 13 invasive species and watercraft as a carrier of invasive species under Ontario's Invasive Species Act, 2015***

The Invasive Species Centre (ISC) is a not-for-profit organization established by the Ontario and Canadian Governments to coordinate projects and connect stakeholders, knowledge and technology to prevent and reduce the spread of invasive species that harm Canada's environment, economy and society. We are pleased to have the opportunity to provide feedback on **ERO #019-3465, Regulating 13 species and watercraft as a carrier of invasive species under Ontario's Invasive Species Act, 2015**. With more than 10 years of experience working with the Province of Ontario on key invasive species issues, and after submitting previous public comment on related ERO postings, the ISC is pleased to provide feedback at this stage, with the hope of improving our collective ability to prevent future species invasions.

Overall, the ISC strongly supports the proposed direction to add 13 species and watercraft as a carrier under Ontario's Invasive Species Act. The regulation of the proposed species will bring Ontario in line with neighbouring jurisdictions in many instances and provide the province with the regulatory tools necessary to prevent establishment and mitigate avoidable impacts.

**Species Specific Feedback**

- The ISC supports this round of additional species regulations to provide wider regulatory coverage of some species-specific concerns in Ontario. We believe the species the Ministry has identified are thoughtful priorities and have clearly demonstrated threats against Ontario's environment, economy and society.
- Inclusion of additional prohibitions related to yellow floating heart and fanwort are welcome additions to the proposed regulatory changes. As you are aware, the less formal 'trade' market has been a challenging pathway to address and these proposed changes will enable new outreach and education opportunities for the ISC.
- Regulating wild pigs is another important milestone that the ISC supports. The proposed regulation leverages the lessons learned from other jurisdictions, including Saskatchewan, and is vital to protecting the natural resources of Ontario.
  - We appreciate the proposed regulation to acknowledge the counterproductive nature of hunting as an effective management tool for responding to wild pigs. This regulation reflects the reality that hunting wild pigs threatens dispersing groups of pigs and results in less effective population management.

**Watercraft as an Aquatic Invasive Species Carrier**

- The ISC supports the steps taken by Ontario Ministry of Natural Resources and Forestry to address this important pathway for the spread of aquatic invasive species. Generally we believe the proposed

regulations are pragmatic steps to reduce the key opportunities for spread presented under this significant pathway.

- Regulating this pathway is critical at a time where the recreational boating industry is seeing tremendous growth of new users due to COVID-19 related behaviours. With this renewed interest in freshwater recreation the ISC is concerned about longer-term implications for AIS spread. As AIS best practices have largely been voluntary we feel these changes are precisely the right regulatory tool to meet the moment.
- Aligning this regulation with the guidance of the widely promoted Clean, Drain, Dry messaging is a wise approach. This will allow organisations such as the Invasive Species Centre to continue to promote the existing best practices and key messaging as we have done in the past.
- The language associated with the proposed rules is clear and simple, which will be important in obtaining compliance from the public. The ISC is well positioned to support bringing key messaging associated with new rules to target audiences and looks forward to working with the Ministry to support communications related to these changes.
- The ISC also commends the Ministry for using an inclusive and broad definition of 'watercraft' as is done in many other jurisdictions. We would advise the Ministry to consider explicitly naming kayaks as another vessel type that qualifies under the new rules. In contrast, we would further advise the Ministry to clarify if floatplanes would be considered watercraft under these new regulations to ensure public understanding is achieved when these regulations come into effect.
- The ISC would note that watercraft inspection station programs have been successfully used by British Columbia, Alberta, Saskatchewan, Manitoba and many other jurisdictions. These stations provide tremendous value in preventing introduction and subsequent spread of aquatic invasive species, but they also enable hundreds of thousands of interactions with key audiences for invasive species mitigation every year. These programs are a wise investment, they have been highly effective and can provide many co-benefits. The ISC would support the Ministry in exploring how this type of a program could be operated in Ontario to complement this regulatory change in the near future.

### **Summary**

In summary, the ISC strongly supports MNRF's proposal #019-3465 to expand the use of the Invasive Species Act, 2015. New regulation of the proposed species, and the watercraft pathway are significant steps to addressing key invasive species opportunities to protect Ontario's environment, economy and society. We welcome continued dialogue with MNRF and other partners in exploring how we can all collectively contribute to these regulatory changes, and additional considerations for future regulations. As new species, pathways and priorities continue to emerge, we hope to continue to support you in enabling more impactful invasive species change throughout our province.

Sincerely,

Sarah Rang

The Invasive Species Centre

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