



June 7, 2021

MNRF - Biodiversity and Invasive Species Section
300 Water Street, 5th Floor North tower
Peterborough, ON
K9J 3C7
Canada.

Re: Regulating 13 invasive species and watercraft as a carrier of invasive species under Ontario's Invasive Species Act, 2015 (ERO #019-3465)

To Whom It May Concern:

Please find Credit Valley Conservation (CVC) comments on the proposal to regulate 13 invasive species and watercraft as a carrier of invasive species. CVC is generally supportive of the recommendations of the proposal, however, we do have a number of suggestions that we feel would benefit invasive species management.

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
- 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

Prohibited Invasive Species

- CVC is supportive of adding all the species suggested to the prohibited species list.
- CVC suggests that transport of New Zealand mud snail associated with dredging be prohibited.

Restricted Invasive Species

CVC is supportive of adding all the species suggested to the restricted species list.

Overland movement of watercraft

- CVC suggests that:
 - watercraft and trailers should be dried for at least 48 hours, sprayed with hot water >40°C or cleaned with disinfecting solution (e.g. bleach)
 - aquatic plants and aquatic organisms should be changed to include mud and aquatic organisms in all references for cleaning

Proposed amendments related to the deposit, release of restricted invasive species

CVC suggests that the amendment should apply to all restricted invasive species, not just plants.

Please let me know if you have any questions.

Yours sincerely,

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

Jon Clayton
Aquatic Ecologist

CC: Dawn Renfrew (CVC)
Freyja Whitten (CVC)
Phil Bird (CVC)
Bill Lidster (CVC)
Scott Sampson (CVC)
Yasmine Slater (CVC)