

November 19, 2021

Sally Renwick

Environmental Assessment Branch

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Canada

**Invasive Species Centre Comments on Clarifying the authority to change the classes of projects to which a class environmental assessment process applies Environmental Registry of Ontario #019-4189**

Dear Mrs. Renwick,

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 #019-4189, a policy proposal regarding Ontario's environmental assessment (EA) requirements. The ISC seeks inclusion of invasive species preventative actions as a part of a comprehensive EA requirements list. Inclusion of invasive species considerations in Class EA projects is essential to address pathways for invasive species spread throughout Ontario and supports legislations such as Ontario's Made-In-Ontario Environment Plan, Canada-Ontario Agreements and the Invasive Species Act.

Invasive species are plants, animals, fish, insects and pathogens that are introduced to and cause harmful impacts where they are not native. Invasive species are often accidentally introduced from elsewhere via unmonitored or underestimated vectors of spread. Many projects under Class EA require construction, soil movement, site alterations and maintenance all of which increase the risk of invasive species spread. For example, an important vector of invasive species spread is infrastructure corridors. Once introduced, invasive species can be costly to remove due to unmanageable ecological advantages and devastating impacts on native species and their ecosystems. An ISC study, which was cited in the *Made-In-Ontario Environment Plan*, estimates that invasive species cost \$3.6 billion annually in Ontario (p. 51). Furthermore, the United Nations cited invasive species as the second-leading cause of extinctions globally ([IPBES, 2019](#)). For these reasons and more, the ISC commends efforts to acknowledge and act on invasive species threat prevention to protect Ontario's environment.

Considering and mitigating potential environmental impacts that can be readily managed before a project proceeds is an integral process of EA's. While we applaud the Nuisance Species Control measures that have been a part of Class EA criteria assessment, we believe that invasive species threat mitigation should go further. Invasive Species threat mitigation is most effectively managed by prevention than by control, in part, because it's the most cost-effective method. **Invasive species preventative and management actions should be included in a Comprehensive EA Project List of considerations** due to the justifiable potential for significant environmental impacts that this list seeks to include (ERO Notice 019-2377). Invasive species suit five of the six noted criteria that are taken into account when evaluating environmental impacts for EA's:

1. There are few environmental threats with greater *magnitude of effect*;
2. Invasive Species can pose a province-wide *geographic threat* if inadequately managed;
3. Once established, Invasive Species threats persist with *long durations of effect*;
4. Invasive Species threats are *growing in frequency* as new ones become established and as existing ones expand their range;
5. Invasive Species harm is *complicated and expensive to reverse*

We have noted that ERO Notice 019-3937 proposes that some electricity transmission lines that currently require an individual EA to follow a Class EA process. ISC has taken note of the underappreciated potential that hydro corridors pose to increase the introduction and spread of invasive species throughout their use and lifecycle. Many priority invasive plants, pests and animals can be found along transmission corridors such as hydro, road and pipeline corridors. As a part of the movement of electrical transmission line construction to Class EA, we strongly encourage the inclusion of invasive species planning be integrated into the approval and implementation process.

We suggest two recommendations to support the integration of invasive species risk mitigation as a part of EA requirements which are outlined below.

**Recommendation 1: Require the application of risk mitigation protocols as they relate to adverse effects of invasive species.** We ask that proponents be required to implement protocols to mitigate Invasive species introduction and spread. Such standardized protocols should include several considerations: application of the Clean Equipment Protocol during construction, maintenance and monitoring, consideration of invasive species in moving land, using native seeds if reseeding, ensuring a chain of custody on imported equipment that verifies invasive species sanitation, and reporting invasive species presence as a monitoring requirement. ISC recommends that proponents be required to apply Best Management Practices (such as those noted above and others listed on ISC and other's websites) for targeted invasive species of interest to the Class EA site in order to prevent undue risk of spread. We would be pleased to provide a comprehensive list of these best management practices for your consideration.

**Recommendation 2: During the EA consultation process, seek out subject matter expertise including local knowledge and Traditional Ecological Knowledge sources.** Invasive species spread is driven by interactions between local environmental factors, native biota and human activities. Inclusion of subject matter expertise that provides a rigorous evidence-based perspective and considers a project's context is crucial to effectively evaluate risks and risk-mitigation efforts. Information valuable to uncover during the consultation process includes the site's history of invasive species, adjacent ongoing invasive species management efforts, neighboring invasive species threats, overlapping invasive species vectors, and neighboring protected and sensitive ecological assets. ISC encourages Class EA efforts to seek out invasive species risk mitigation expertise as a part of the consultation and documentation process.

The Invasive Species Centre is hopeful to see the above-noted recommendations be considered for ERO Notice #019-4189. We see the Class EA process as a key driver to help prevent the introduction and spread of invasive species in order to protect Ontario's natural assets and economy. We would be pleased to continue our active participation in commenting on opportunities to mitigate Invasive species risks to EA planning processes throughout the ongoing EA modernization process. Please contact me if you have any questions or wish to discuss.

Sincerely,

A handwritten signature in black ink, appearing to read 'Colin Cassin', with a stylized flourish at the end.

Colin Cassin

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The Invasive Species Centre

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