

October 21, 2019

Provincial Planning Policy Branch  
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**Invasive Species Centre Comments on Environmental Registry of Ontario #019-0279, Ontario's  
Provincial Policy Statement Review**

To Whom It May Concern,

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 #019-0279, a review of Ontario's Provincial Policy Statement (PPS). The ISC views the PPS as one of the most important tools for encouraging smart development, while protecting the environment and natural resources that Ontarians rely upon.

Although the PPS does not explicitly address invasive species and their pathways in previous iterations, we view this as an excellent opportunity to highlight aspects of the PPS that relate to and have impact on key pathways to invasive species spread and establishment. When working with conservationists, developers, and municipalities alike, we see a few key areas the PPS can be leveraged to ensure Ontario's taxpayers are not burdened with the ecological and economic consequences of development-enabled invasive species spread, thereby ensuring the continued health of Ontario's natural areas through efficient land use planning. We would like to highlight some key concerns with the proposed PPS after a thorough review:

- **On-Site Use of Fill:** We are pleased to see the revised PPS encourages the on-site and local reuse of excess fill in policy 3.2.3. Fill and aggregate contamination via invasive species is an understudied and underregulated pathway for invasive species spread. Although we understand there may be interest in considering regulatory tools to address at least some of this pathway for invasive species spread, it is also a good practice to highlight in the PPS. Minimizing the volume and frequency of site to site fill movement is a reasonable step to mitigate this pathway for unintended invasive species spread. ***The ISC strongly supports including language that encourages the local use of excess fill in the PPS update.***
- **Minimizing Habitat Fragmentation and Disturbance:** As a rule, increased habitat fragmentation enables a greater probability of invasive species introduction. By keeping more contiguous natural features in an area we can reduce the risk of invasive species spread into more ecologically valuable habitats. The proposed changes in the PPS need to do more to protect vitally important natural features including:

- **The Greenbelt:** As one of Ontario's most important natural features, the relatively contiguous nature of the Greenbelt, and its natural features, enable it to be more resistant to invasive species. Unnecessary development and other forms of ecological disturbance within the Greenbelt increases the opportunities for invasive species (e.g. dog-strangling vine, Phragmites and many others) to establish. The core distribution of numerous invasive species is contained by the Greenbelt currently, making its function in slowing the spread of invasive species notable. ***The ISC strongly supports the continued protection of this important feature in the PPS update.***
- **Wetland Protection:** Wetland loss continues to occur at an alarming rate in Southern Ontario. In Central and Northern Ontario, wetlands are also being removed from the landscape with concerning regularity. Even where wetland recreation or compensation occurs, key functions and quality are lost. Current regulatory approaches used by Ontario and its municipalities have proven ineffective at stopping trends in wetland loss. These trends are becoming even more concerning with increased flooding due to climate change. Healthy wetlands, like their terrestrial habitat counterparts, are more resistant to invasive species. Invasive plants such as Phragmites, purple loosestrife, water soldier and others are often viewed as indicators of disturbance and reduced ecological health when present in a wetland. By strengthening development buffers and other science-backed policy changes to protect wetlands from development we are ensuring that the natural function and biological diversity of these important systems is maintained. ***The ISC strongly supports enhanced wetland protection measures and encourages the Province of Ontario to strengthen language in the PPS update to better protect wetlands, especially unevaluated wetlands with a high likelihood of Provincially Significant classification. Stronger wetland protection measures would align with the Action Area noted in the Made-in-Ontario Environment Plan which directs the province to collaborate with partners to "conserve and protect" wetlands.***
- **Mainstreaming Biodiversity:** As this and future generations face the ecological and economic burden of climate change and other human led disturbances, our planet is losing species at an alarming rate. Biodiversity is a critical element to life on this planet and future development must show greater consideration to native species and existing natural areas to ensure Ontario upholds its obligations to curb species losses. ***The ISC strongly supports including biodiversity consideration within policies 1.8.1 f and 1.8.1 g. Furthermore, promoting the use of native species, where possible, within 1.8.1 g would also improve the balance of this policy.***

In addition to these suggestions, the ISC would also like to take this opportunity to address some of the key questions identified in the PPS posting on the Environmental Registry of Ontario, particularly those which we feel are within our expertise:

1. *Do the proposed policies effectively support goals related to increasing housing supply, creating and maintaining jobs, and red tape reduction while continuing to protect the environment, farmland, and public health and safety?*

The ISC can address this through the ability of the PPS to protect the environment and farmland. The current lack of any invasive species preventative measures, minor or otherwise (e.g. natural area continuity, etc.) does not adequately serve to protect the environment. Ontario agriculture is threatened by pests – both crop pests and invasive plants – and the existing PPS, and proposed changes, do not include their consideration or address any preventative measures.

The ISC recommends that the PPS includes stronger measures generally for environmental protection of sensitive features and to protect Ontario's agriculture from crop pests and invasive plants.

*2. Do the proposed policies strike the right balance? Why or why not?*

The ISC is concerned about the changes that will be made in relation to wetland protection. In Section 2.1.10, significant wetlands may be chosen to be protected in accordance with the guidelines set by the province, further to this, local municipalities may choose to protect unevaluated wetlands. These changes, to more permissive language indicate a lack of environmental protection related to wetlands and unbalanced outcomes favoring development in sensitive areas.

The ISC believes that the policies in the PPS do not strike the right balance overall and favor streamlined development over environmental protection, largely impacting the protection of wetlands. The ISC recommends stronger language around the protection of wetlands and other development sites to encourage healthier environments that are more resistant to invasive species establishment.

*3. How do these policies take into consideration the views of Ontario communities?*

Omitting invasive species considerations in the early stages of development planning ensures that future management costs are passed on to taxpayers at the community level. These burdens can be considerable, and in some cases present situations requiring perpetual investment by local taxpayers. To this point, in 2018 the ISC completed a survey related to invasive species investment in Ontario. Results indicated that the total estimated expenditures by municipalities and Conservation Authorities across Ontario is \$50.8 million per year. The estimated average expenditure per Ontario municipality is \$218,148 per year and \$314,724 per year for Ontario conservation authorities (ISC, 2018). The ISC believes that Ontario communities could be better protected from the costs associated with invasive species management and control by implementing protection in the early stages of the development process through policy changes. Including and strengthening policies addressing fill movement, protecting valuable natural features and habitats, and replanting with native species are some simple solutions to reduce costs associated with invasive species from burdening local taxpayers.

*4. Are there any other policy changes that are needed to support key priorities for housing, job creation, and streamlining of development approvals?*

This question is outside the scope of our expertise. As such the ISC declines the opportunity to comment on this matter.

*5. Are there other tools that are needed to help implement the proposed policies?*

Regulatory tools are currently missing to help us address clean/weed free fill and aggregate movement. Contaminated heavy equipment is frequently cited as the likely initial vector in many invasive species control projects, yet we do not have effective regulations to address this pathway. Although this must be addressed by various pieces of legislation, the ISC believes it can be addressed at a high level within the PPS.

In summary, the Invasive Species Centre hopes this feedback will be useful to the Provincial Planning Policy Branch staff as you proceed with the Provincial Policy Statement review. We look forward to continued dialogue during the public engagement phase to ensure the revised PPS can be a helpful tool to communities across Ontario.

Sincerely,

The Invasive Species Centre  
[www.invasivespeciescentre.ca](http://www.invasivespeciescentre.ca)