

March 30, 2020

**Biodiversity Coordinator**

MNRF - Biodiversity Section

300 Water Street   
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Submitted online at: <https://ero.ontario.ca/notice/019-1162>

**Re**: **Seeking information on 13 species and one carrier for possible regulation under the *Invasive Species Act, 2015*. ERO number: 019-1162**

To Whom It May Concern:

The Nature Conservancy (TNC) supports the Ontario Ministry of Natural Resources and Forestry’s (MNRF) efforts to complete ecological risk assessments, and to proceed to develop a regulatory proposal, for 13 species and one carrier. The Nature Conservancy is a world-wide, non-partisan, science-based organization that seeks to conserve the lands and waters on which all life depends. We have conservation projects in 79 countries around the world; our Canadian affiliate is called Nature United. Our staff and volunteer leaders work to identify and support solutions to environmental challenges that support the planet’s diversity of life as well as human well-being.

TNC is working in the Great Lakes to support efforts that will harmonize aquatic invasive species (AIS) policy and regulations in the Great Lakes Region. Strong, consistent AIS regulations are important to protect our common natural resources in the Great Lakes. We congratulate Ontario on your ***Invasive Species Act, 2015***, which is designed to prevent new invasive species from arriving and establishing in Ontario, and reduce the harm posed to the natural environment and economy by those that are already here. TNC supports your efforts to implement it.

TNC supports the MNRF review of: Marbled crayfish (Procambarus virginalis); Tench (Tinca tinca); New Zealand mud snail (Potamopyrgus antipodarum); European frogbit (Hydrocharis morsus-ranae); Yellow floating heart (Nymphoides peltate); Prussian carp (Carassius gibelio); Red swamp crayfish (Procambarus clarkia); Fanwort (Cabomba caroliniana); Bohemian knotweed (Reynoutria × bohemica); Giant knotweed (Reynoutria sachalinensis); Himalayan knotweed (Koenigia polystachya); Mountain pine beetle (Dendroctonus ponderosae); and Wild pigs (Sus scrofa).

TNC has reviewed the AIS regulations of the Great Lakes states and provinces and found several of the aquatic species are prohibited or restricted by the following jurisdictions:

*Aquatic Animals-*

Tench: MI, NY, OH, QBC, WI

New Zealand mud snail: MI, MN, NY, WI

Prussian carp: MN, OH

Red Swamp crayfish: MI, MN, WI

*Aquatic Plants-*

European frogbit: IL, IN, MI, MN, NY, WI

Yellow floating heart: IL, IN, MI, NY, WI

Fanwort: MI, NM, NY, WI

TNC supports the use of scientific risk assessments to determine which species pose a significant threat to the economic and ecological health of the Great Lakes region. We have compiled the results of many risk assessments done for the region, and there are a number that classify the following aquatic species as high risk for causing ecological or economic damage, or a risk to human health.

*Aquatic Animals-*

Tench: EPA2008, WI

New Zealand mud snail: ERSS, EPA2008, GLANSIS, WI

Prussian carp: ERSS, GLANSIS

Red Swamp crayfish: ERSS, GLANSIS

*Aquatic Plants-*

European frogbit: NY, EPA2008, GLANSIS, WI, USAWRA

Yellow floating heart: NY, EPA2008, GLANSIS, WI, USAWRA

Fanwort: NY, EPA2008, GLANSIS, WI, USAWRA

The complete list of regulated AIS in the Great Lakes region and a description of the risk assessments referenced above may be found at: <https://www.blueaccounting.org/sites/default/files/2020-03/Great%20Lakes%20Prohibited%20Species%20Lists_JUL%202018.pdf>

The threat of the above AIS are recognized scientifically through multiple risk assessments and several other Great Lakes states regulate them. Regulation by Ontario will be consistent with available scientific information and regulations in other states in the region. This action will help safeguard the Great Lakes and Ontario’s water resources.

TNC supports MNRF’s consideration of regulating the movement of watercraft over land as a carrier under the *Invasive Species Act, 2015*. Overland transport of small-craft boats is recognized as a means of transporting AIS such as spiny waterflea (*Bythotrephes longimanus)*; Eurasian watermilfoil (*Myriophyllum spicatum)*; and zebra and quagga mussels (*Dreissena* spp.). These organisms are

known to have considerable negative effects on the aquatic ecosystems they invade.

Many states emphasize boat inspection and cleaning when leaving a waterway. For example,

regional campaigns such as the Clean Boats/Clean Waters programs of Wisconsin and Michigan (www.uwsp.edu/cnr/uwexlakes/cbcw/) and national programs such as Protect Your Waters

(http://protectyourwaters.net) recommend the following actions for boaters to reduce their likelihood of transporting AIS: “(1) inspect and remove aquatic plants, animals, and mud from boat, trailer, and equipment before leaving the landing, (2) drain all water from boat, motor, live wells, bilge, bait buckets and other containers before leaving the landing, (3) ice your catch; don’t leave landing with any live fish, bait, or fish eggs, (4) dispose of unused bait in trash, not in the water or on land, and (5) rinse

boat and equipment with hot or high pressure water or dry boat for at least five days” [www.uwsp.edu/cnr/uwexlakes/cbcw/Pubs/AISprevention\_steps.pdf](http://www.uwsp.edu/cnr/uwexlakes/cbcw/Pubs/AISprevention_steps.pdf)). States have also found it necessary to make these actions mandatory to achieve the necessary compliance levels to be effective.

Thank you for the opportunity to comment. Please feel free to reach out if you have questions about our work or these comments, contact information below.

Sincerely,

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The Nature Conservancy

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