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Invasive Species Centre Comments on Ministry of Natural Resources and Forestry proposal for renewing the Ontario Invasive Species Strategic Plan ERO #019-7582

The Invasive Species Centre (ISC) is a not-for-profit organization established by the Ontario and Canadian Governments to coordinate projects and connect partners, knowledge, and technology to prevent and reduce the spread of invasive species that harm the environment, economy, and society. We are pleased to have the opportunity to provide feedback on ERO #019-7582, *Seeking feedback on Ministry of Natural Resources and Forestry proposal for renewing the Ontario Invasive Species Strategic Plan*. With more than 12 years of experience working with the Province of Ontario on key invasive species issues, and after submitting previous public comments on past ERO postings, the ISC is pleased to provide feedback at this stage, to help our collective ability to prevent future species invasions.

The ISC strongly supports the renewal of the Ontario Invasive Species Strategic Plan (OISSP).

The proposed renewal will support the prevention, detection, and management of invasive species in Ontario. The ISC is pleased to see the summary of important work undertaken in the last 10 years to support invasive species work across the five categories. Great strides have been made to increase prevention and management of invasive species, and many additional opportunities exist to expand this work through a renewed plan.

Invasive species cost Ontario an estimated \$3.6 billion annually, with these costs being expected to grow exponentially over the coming years. According to a recent risk assessment conducted by the U.N.-led Intergovernmental Platform on Biodiversity and Ecosystem Services (IPBES), the cost of invasive species globally exceeded \$423 billion annually in 2019, with costs having at least quadrupled every decade since 1970. Invasive species pose a threat to Ontarians and their access to natural resources by driving native species extinctions, which in turn leads to high economic impacts of management. A strong strategy is critical to enacting a coordinated and collaborative effort in the province among a wide range of partners.

The renewal of the OISSP responds to the recent 2022 Ontario Auditor General's Report. It addresses a key recommendation and commitment from the Ministry of Natural Resources and Forestry (MNRF) to review and renew the OISSP document. An update of the OISSP will support guiding Ontario's invasive species work into the future.



The proposal notice asks three questions for feedback:

1) What is your vision for the future of invasive species prevention and management in the province?

- Our ISC vision is a Canada where lands and waters are protected from invasive species.

2) What opportunities are there for the future of invasive species prevention and management in Ontario?

- There are many opportunities including: increasing the sense of urgency for action on invasive species, increasing coordination and cohesion, building the business case for investment, and providing support for Indigenous, municipal and land managers. Many of these opportunities are described below.

3) Do you think there are barriers related to invasive species prevention and management in Ontario? How could these barriers be addressed?

- There are barriers related to invasive species prevention and management including: roles and responsibilities, pace of change outstripping our systems, capacity, and funding, lack of awareness of economic, environmental and social costs of invasives, and early stage of development and application of practical management tools. Many of these barriers and ideas to address them are described below.

Feedback on Renewal within the Core OISSP Areas:

Legislation, regulation and policy:

- The work to expand the species and pathways regulated under the Invasive Species Act has been a critically important step in preventing the spread of invasive species. We encourage continued and enhanced development and enforcement of regulations, in conjunction with expanded outreach.
- ISC supports work to quantify the cost of invasive species. Understanding the current and future economic impacts of invasive species helps build the business case for investment, and prepare those who would be most impacted. Being able to express the costs of invasive species impacts is critical to leveraging new investment in invasive species.
- There are new innovations in conservation financing/nature-based solutions financing that could help support invasive species prevention and management. ISC has started



exploring these methods and encourages work to incorporate invasive species management into these new investment mechanisms.

- There are new opportunities to include invasive species in policy work on changing climate, including recognizing the changes in carbon storage with invasive species, and the role of invasive species in wildfires.

Leadership and coordination:

- Challenges in forest health are increasing in recent years with new introductions and range expansions of forest invasives. Increasing the collaboration between the existing Canada-Ontario Forest Health Working Group for Ontario and the forest industry would foster increased understanding of current gaps in monitoring, management, research and resources.
- We encourage the consideration of a Forest Pest Strategy in Ontario. The current challenges of forest invasives, solutions and need for increased monitoring and management could be discussed at the Canadian Council of Forest Ministers, perhaps through the Forest Pest and Diseases Working Group to help enable coordination and greater management of forest invasives across the country.
- ISC supports forums to encourage the discussion of roles and responsibilities on invasive species.
- ISC supports increased collaboration with Indigenous communities and organizations, and to incorporate additional ways of knowing into work on invasive species.
- Municipalities are often at the forefront of invasive species management and control work, and as such increased involvement in the OISSP strategic actions would be beneficial. Management planning is a key gap seen in many municipalities and is an area where additional supports and guidance could be an activity through the OISSP.
- We suggest there is an opportunity to actively link invasive species into other “frames” and government programs including biodiversity, climate change, public health, infrastructure, agriculture, recreation and tourism to help provide additional support for invasive species management.

Risk analysis:

- Risk Assessment and Best Management Practices (BMP) databases were established by ISC to increase accessibility of resources for land managers. The addition of government assessments and BMPs to this database could increase efficiency and accessibility for land managers in Ontario.
- ISC supports MNRF’s development of additional risk assessment methods including those for terrestrial species and horizon scanning processes to help identify new and emerging invasive threats.



- We encourage the development of a list of invasive species for Ontario to support early detection and alerts, as well as to better support those working in Ontario to classify species considered invasive in the province.

Monitoring and science:

- A greater understanding of the current status of invasive species in Ontario is needed. Community science can play an increased role in enhancing invasive species monitoring programs. ISC supports continued work to increase consistency and accessibility of data in the Province. Increased commonality of where data is stored and shared will lead to increased understanding of the current status in Ontario.
- We encourage the development of new tools to assist in the management of invasive species including new monitoring and mapping techniques, drones to map and manage invasives, and new management techniques
- Research into biocontrol methods needs to continue to be supported, with emphasis on the implementation of biocontrol measures.

Management measures:

- A positive outcome of OISSP includes the development of best management practice documents that create clear and consistent recommendations to those managing invasive species. Continuation of this work to incorporate all species on the ISA 2023 update would be beneficial.
- An increased investment to aid in additional management opportunities would be extremely beneficial to support continued action.
- Invasive Species Granting programs have greatly increased the capacity and ability of many local land managers and groups to take action on invasive species. Continuing these granting programs can help support local community-based action, create new skills and training opportunities and leverage additional resources.

Communication and outreach:

- Consistent communication is necessary to help Ontarians—from students and outdoor enthusiasts to land managers and decision-makers – realize and internalize the impacts of invasive species and the steps that can be taken at each level to prevent and reduce them. Success stories should be a focal point of this communication to inspire hope that people's actions can and do have positive impacts.
- Municipalities, conservation authorities, and Indigenous governments and communities across Ontario are active players in detecting and managing invasive species. The ISC works to strengthen the collaborative communication to and among land managers and decision-makers at the local level. Continued and expanded outreach to this audience,



including the development of audience-specific resources, would strengthen the links between local-level groups and the overall Ontario invasive species strategy.

- Signage continues to be an effective way to provide practical information on invasive species prevention and management and we support measures to help municipalities and other land managers increase invasive species signage.
- With Ontario being at higher risk of invasive species introductions due to a variety of factors relating to the scale of industry, high population density, trade, and large geographic range, the ISC supports conducting a gap analysis to determine what areas of outreach could be strengthened. This would allow for a wraparound approach to preventing new species introductions, as well as increasing the chances of early detection.

Summary

In summary, the ISC strongly supports MNRF's proposal #019-7582 to renew and update the Ontario Invasive Species Strategic Plan. This plan provides an important framework for protecting Ontario's environment, economy, and society with key targets and tactics identified. Importantly, we would also recommend that additional activities be incorporated under the renewal to help move the yardstick forward on invasive species monitoring, management and research. We welcome continued dialogue with MNRF and other partners in exploring how we can all collectively contribute and support the renewal, including through implementation and communication. The ISC is well positioned to continue to support MNRF in our shared goals of preventing invasive species impacts in the province of Ontario.

Sincerely,

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