

# ONTARIO FEDERATION OF ANGLERS & HUNTERS

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*Ontario Conservation Centre*

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Subject: ERO# 019-7582—Renewing the Ontario Invasive Species Strategic Plan.

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers, and supporters, including 725 member clubs.

As a long-standing partner of the Ministry of Natural Resources and Forestry (MNRF) delivering Ontario's Invading Species Awareness Program (ISAP), the OFAH would like to take this opportunity to congratulate the MNRF and its partners on their achievements over the last decade, as highlighted in the *Ontario Invasive Species Strategic Plan: Review in Progress (2012-2022)*. Collectively, with guidance from the *Ontario Invasive Species Strategic Plan*, we have been able to work towards increased education and outreach, early detection and rapid response, regulatory frameworks, and management of invasive species across Ontario.

Invasive species harm biodiversity, including native species and their habitats, hinder recreational activities, and cause major economic costs each year to Ontario, totaling approximately \$3.6 billion annually. It is safe to assume that these costs will continue to increase as new species are introduced (e.g., marbled crayfish, oak wilt, etc.). Therefore, the OFAH supports the MNRF's future focus to 1) prevent new invaders from arriving and surviving in Ontario, 2) slow and, where possible, reverse the spread of existing invasive species, and 3) reduce the harmful impacts of existing invasive species. To achieve these goals, we feel it will be important to invest in education and outreach, early detection, rapid response, and enforcement, as described in more detail below.

Education and outreach to Ontario's public remains a vital tool to curb the spread and introduction of invasive species in the province. Each year, the ISAP reaches millions of Ontarians with targeted messaging, including Clean, Drain, Dry, how to identify and report invasive species, and what new species are being regulated in the province. Through effective partnerships, this messaging is an inexpensive, long-term tool that reaches cottagers, campers, boaters, anglers, hunters, new Canadians, as well as many other important demographics of people who may encounter invasive species. Continued and sustained (at an appropriate scale) funding would provide certainty to be able to implement and deliver programs in support of invasive species education and outreach, early detection, and management in Ontario.

When education and outreach is sustained, members of the public are able to recognize and report invasive species via one of the early detection tools we have in place in Ontario (i.e., the Invading Species Hotline [ISH], the Early Detection and Distribution Mapping System [EDDMapS], ISAP's email, or the *Invasive Species in Ontario* iNaturalist project). These early detection tools continue to be a vital resource in the province, facilitating rapid response for numerous high-risk species, including Grass Carp detections in Lake Gibson, European water chestnut in the Welland River, water soldier in Red Horse Lake and countless private ponds, and the first report of oak wilt in the country. Over the next ten years (and beyond), we encourage the MNRF to continue funding these necessary tools to ensure that federal, provincial, municipal, and NGO partners are notified and can respond as efficiently and effectively as possible.

Early detection, as a tool, is only as effective as the rapid response that follows it. Despite some rapid response successes in the recent past, there are noticeable barriers in our collective capacities to respond to new detections of high-risk species. Some of these barriers are out of our control (e.g., few management or eradication tools existing), while other barriers exist within the current structure of the MNRF. In the past, the MNRF and their biologists have played crucial roles in rapid response efforts to species like water soldier on the Trent Severn Waterway and the Black River, and the more recent detection of marbled crayfish in Burlington. Despite their past and ongoing efforts, which are recognized and appreciated, there is a noticeable decline in the MNRF's capacity to assist with new introductions of high-risk species. Therefore, it is our recommendation that the MNRF re-engage their Regional Operations Division staff to increase their capacities to lead and/or assist partners, when necessary, with rapid response efforts.

Additionally, it is our recommendation that the MNRF seek to lead the creation of a formal 'Rapid Response Task Force' (RRTF) for the Province of Ontario. This RRTF should have leadership from both MNRF staff and various organizations with experience in identifying, monitoring for, and managing invasive species. This RRTF would be focused on investigating legitimate high-risk species reports (e.g., aquatic invasive plants, invertebrates, etc.) that are received by the early detection tools highlighted previously in this submission.

Another essential tool in preventing the introduction and spread of invasive species in Ontario is the *Invasive Species Act (ISA)*. The OFAH and the ISAP continue to support the additions of species as restricted and prohibited under the ISA and encourage the MNRF to continue doing so; however, we are concerned that the MNRF's capacity to enforce the ISA diminishes with each round of additions. As we know, regulations are only as effective as the enforcement that supports them; therefore, as we have recommended in a previous submission, the OFAH recommends that the MNRF create an 'Invasive Species Enforcement Task Force' (ISETF) to focus on the enforcement of the ISA, both on the ground (e.g., inspections of animal retailers) and online (e.g., Facebook Marketplace, various Facebook aquarium pet swaps, Kijiji, etc.). Once established, partner organizations with expertise on the identification of invasive fishes, invertebrates, and/or aquatic and terrestrial plants could train this newly formed task force to assist with enforcing the regulations set out by the ISA.

This would also revolutionize the way high-risk species reports are handled in the province, and we offer this as an abbreviated example: A high-risk report is received via one of the early detection tools in the province, the species in question is identified and confirmed as a high-risk species, the information (e.g., location information, species, and all accompanying information) is passed on to the MNRF and it is deemed necessary to pass along to the RRTF (i.e., to investigate the extent of the population, possible pathway of introduction, etc.) and the ISETF (i.e., has there been an ISA infraction) to follow up. In this example, it shows how quickly the RRTF and the ISETF could respond to ensure that the species is contained.

Invasive species cost Ontario and Canada's economies billions of dollars each year, while our investments in their prevention have been negligible in comparison. At the OFAH, our vision for the future is one where we continue to invest in invasive species and that this investment increases to meet the ongoing needs of the province and partners to protect our environment, economy, and society. This investment should not come at the expense of other MNRF programs or from the Special Purpose Account, as invasive species impact Ontario in all sectors and as such, should be addressed through new Consolidated Revenue funding. Additionally, while having a strong regulatory tool such as the ISA is a large step in the right direction towards prevention, it requires greater investment to ensure compliance. With new amendments to the ISA, these new regulatory efforts need to be complemented with continued investments in education and outreach, early detection, rapid response (e.g., RRTF), and enforcement (e.g., ISETF).

In conclusion, Ontario's public have and will continue to look to the MNRF and its long-standing partners as leaders in the fight against invasive species moving forward into the next ten years. These years will be pivotal in preventing new introductions of high-risk species as we continue to experience the effects of climate change and new and evolving ways that species are spread around the world. The OFAH/MNRF partnership that has established over the last 30+ years to address invasive species is invaluable and we look forward to the future as we collectively work towards protecting our natural ecosystems, the health of our water resources, our economies, and our society, including human health.

Yours in Conservation,



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