

January 4, 2024

Public Input Coordinator  
MNRF – Biodiversity and Invasive Species Section  
300 Water Street, 5th Floor North tower  
Peterborough, ON  
K9J 3C7

Dear Public Input Coordinator,

**Re: ERO # 019-7582 Proposed Renewal of the Ontario Invasive Species Strategic Plan**

Ontario Nature is pleased to support the proposed renewal of the Ontario Invasive Species Strategic Plan, 2012. We commend the ongoing efforts and achievements highlighted in the proposal and appreciate the opportunity to provide input on prevention and management strategies from the lens of a member-based nature organization.

Ontario Nature is a charitable organization representing 150 nature groups across the province, many of which have long-standing expertise in this area. Our comments below incorporate feedback received from 19 member groups\* from across the province. We are interested in contributing to further discussions as this letter provides only a summary of our collective input.

Invasive species represent an ever-increasing threat to vulnerable species and ecosystems in Ontario, among compounding pressures from human activities including habitat loss and climate change. With Canada as a signatory to the 2022 [Kunming-Montreal Global Biodiversity Framework](#), Ontario's invasive species strategy should align with actions being developed at the federal level for [Target 6](#) of the framework, which aims to "Reduce the Introduction of Invasive Alien Species by 50% and Minimize Their Impact".

To support the call for comments towards this renewal, Ontario Nature offers the following key recommendations and approaches for invasive species detection, prevention and management:

1. Support the ongoing engagement and consultation with Indigenous Peoples, and the equitable inclusion of differing Knowledge systems and understandings of invasive species throughout decision making processes, with recognition of and respect for Indigenous rights and responsibilities to ancestral territories.
2. Prioritize prevention strategies through a whole-of-government approach, aligned with the [Ontario Biodiversity Strategy](#). As recommended by the [Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services](#), prevention requires implementing effective regulatory mechanisms and intra-jurisdictional cooperation, reducing disturbance of intact natural environments and protected areas, and ongoing public and industry education.

3. When prevention is not possible or fails, prioritize early detection and rapid response, which requires effective and coordinated monitoring. This is particularly critical in connected water systems such as the Great Lakes where eradication and control are more challenging.
4. Secure locally oriented and multi-year funding for land management organizations that often conduct invasive species removals and are heavily reliant on government funding and grants. Funding opportunities for developing and implementing prevention and early detection strategies are often less available than funding for the management stage (i.e., acquiring grants to purchase equipment for invasive species removals). As prevention and early detection are proven to be the most effective stages for controlling invasive species, funding priorities and timelines should reflect this.
5. Provide leadership to increase municipal, intra- and inter-provincial, and international strategic collaboration on prevention, early detection, control and eradication efforts. Ontario Nature member organizations identified the need for consistent provincial direction and oversight, particularly for early detection measures. For example, provincial support for an agency that coordinates local and regional detection and management efforts of invasive tree pests, like Hemlock Woolly Adelgid, would improve efficiency and outcomes.
6. Continue to regulate the sale of invasive ornamental plants in nurseries and garden centres, and increase large-scale public awareness of invasive species and their impacts. Ontario Nature owns and manages 26 nature reserves totaling 3,156 hectares and performs invasive species removals as part of the management of these properties. During removals, invasive plant species that are available at nurseries and garden centers have increasingly become a focus of these removals.

Ontario Nature appreciates the provincial achievements made in the last decade since the release of the original strategic plan, including the development of the Invasive Species Act, 2015. We recommend that the province focus funding efforts towards local, ground-level prevention strategies and implementation, rather than prioritizing funding for management of existing invasive species. Additional reflection on the plan's alignment with the Global Biodiversity Framework will better coordinate invasive species efforts nationally and improved legislation, regulation and policy will be instrumental in addressing the threat of pathways for introduction and spread.

Yours sincerely,

Corina Brdar  
Conservation Planning and Policy Manager  
Ontario Nature



\*Birds Canada, Brant for Nature, Friends of the Carp Hills, Friends of Second Marsh, High Park Nature Centre, Ingersoll District Nature Club, Junction Creek Stewardship Committee, Lakeshore Eco-Network, Nature London, Niagara Falls Nature Club, Nith Valley EcoBoosters, Ottawa Field Naturalists Club, Ottawa Stewardship Council, Penokean Hills Field Naturalists, Sarnia Environmental Advisory Committee, Sunfish Lake Association, Sydenham Field Naturalists, Thickson's Woods Land Trust, & York Simcoe Nature Club