

**Ministry of Transportation, West Operations, Maintenance Comments**  
**RE: Renewing the Ontario Invasive Species Strategic Plan**  
**Environmental Bill Registry Proposed Changes to the Invasive Species Act, 2015**

The following comments have been compiled by Jessica Smeekens, R.P.F., Vegetation Services Coordinator, Maintenance West, Ministry of Transportation (MTO), and Chair of MTO's Provincial Vegetation Working Group.

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

Presently, vegetation management is focused on control of invasive species, and not the underlying factors that lead to invasion, such as development, hygiene, and reduced vitality of our ecosystems. Managing invasive weeds with a more holistic approach, such as updating drainage practices, using the Clean Equipment Protocol for Industry (2016), and maintaining the overall health of local ecosystems, can reduce the need to treat invasive species and tangentially improve the vitality of our living environment, which will significantly impact our resilience to future invasions.

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

Enforcement, Restoration, and Legislation efforts are a multi-layered approach that can lead to success in future invasive species prevention and management programs throughout the province.

Use of the MTO weigh scales at Commercial Vehicle Inspection Facilities (CVIF) to help enforce the Clean Equipment Protocol for Industry to inspect commercial vehicles, which have been moving invasive species throughout the province. Potential use of the CVIF MTO scales to enforce the restrictions on civilian vehicles for the movement of firewood and restricted plant materials, including prohibited movement of dirt and debris in recreational vehicles.

Restoration methods that prevent invasions, rather than focusing entirely on eradication, presents a superior opportunity to improve the control of invasive species. The MTO are initiating a study to analyse restoration post-Phragmites spray. The study is investigating the costs, the efficacy of the treatment, and the return interval to the next invasion.

Treatment options will include:

- 1) Conventional: Cut and Spray
- 2) Reseed: Cut, Spray, and Seed with MTO standard roadside mix (non-native species composition)
- 3) Naturalize: Cut, Spray, and Seeded with MTO West Region Native Seed Mix
- 4) Restore: Cut, Spray, Seeded with MTO West Region Native Seed Mix and drill-seed application of a Native Arbuscular Mycorrhizae product.

While foraging is generally prohibited throughout municipal lands across the province, The City of London has adjusted their tree protection by-law to allow the foraging and removal of any invasive species of plant from their woodlands (while still prohibiting the harvesting and foraging of native species).

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

The rate of growth and development throughout the province is exceeding individual organizations' ability to address the invasive species which accompany development, thus, using the province's existing enforcement and monitoring infrastructure to help minimize the spread would greatly assist in improving results.

Expanding programs, such as that of the Nature Conservancy of Canada (NCC), that treat the polygon, through notification, communication, and cost sharing with property owners, could improve the efficiency and the efficacy of treatment programs. Presently, property owners treat invasive species on their own schedules, to their property lines, rather than at the polygon level, achieving inconsistent results which lead to reinvasion and spread.

### **Comments:**

#### **Ontario Invasive Species Strategic Plan; Review of Progress 2012-2022**

- 1) *MNR's 209 conservation officers enforce legislation related to natural resources and invasive species.*

These officers could work at MTO scales to perform inner-province inspections on recreational and construction equipment

- 2) *Since 2012, more than 50 provincial parks and conservation reserves have developed management plans under the Provincial Parks and Conservation Reserves Act, 2006.*

The provincial parks can be more proactive in addressing the risk of the firewood marketplace to the parks. Provincial policies restrict the movement of Ash to parks, due to the mass death and destruction caused by the Emerald Ash Borer (EAB). At this point in Southern Ontario, the only firewood that should be acceptable to transport into a park is Ash. All other species would be a threat to the currently healthy but susceptible trees in provincial parks.

- 3) *As of 2015, nine additional species were added to the Schedule of Noxious Weeds under the Weed Control Act, providing an important province-wide tool for weed inspectors to control weed plants that interfere with agriculture or horticulture.*

These acts, as multiple pieces of legislation, are unclear and do not adequately communicate, to the general public, what enforceable actions can be taken based on the various invasive species. The difference between the enforceable action for species contained in the Weed Control Act, and its supporting

Schedule of Noxious Weeds, and the species listed in the Invasive Species Act is vast.

Combining these would streamline and allow for much needed clarification. Additionally, there should be consideration for enforceable action on negligent behaviours, including driving through Phragmites stands and spreading it with recreational or commercial equipment, bringing dirty equipment or soils to building sites, decorating with these materials because they are pretty.

- 4) *The Ontario Tree Seed Transfer Policy was updated in 2020 to support the long-term success of forest regeneration activities in a changing climate. Seed transfer can support healthy, resilient forests by promoting forest adaptation, conserving the genetic diversity of native species, and helping tree populations keep pace with changing conditions.*

It has long been understood that forests are ecosystems; there is a reliance on the different components of flora and fauna and how that relates to individual and group health in an ecosystem. This policy only accounts for the genetic origin of the seed stock, and not the forest associates in the transfer. Including transfers of shrubs and plants, or ensuring that seed transfer occurs from ecosystems to comparable locations where plant and animal associates are similar, should be a focus.

- 5) *Over the past 50 years, hemlock woolly adelgid has caused considerable damage and mortality to eastern hemlock in the United States.*

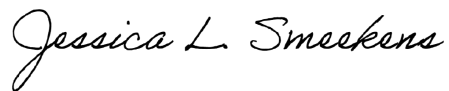
The risk of spread of this pest throughout southern Ontario is severe. There is no restriction on the movement of planting stock from infected regions to non-infected regions. The information regarding the restriction of the movement of regulated pests on firewood is not made readily available, and the public generally is not included in phytosanitary protocols when traveling from one natural area to the next. The public is both the greatest asset and greatest risk of this program; greater focus should be spent on education and enforcement.

6) *The Ministry of Transportation (MTO) developed and added restorative native grass and forb seed mixes to the Ontario Provincial Standard Specification (OPSS) 803—*

This is a first step. OPSS 803 covers the entire province, and the native seed mixes should reflect the diverse geology and accompanying biology of the province. Additionally, the MTO is collaborating with contractors to focus on the Clean Equipment Protocol and the treatment of soil with invasive species seeds and rhizomes present.

Thank you for your consideration of the Maintenance West perspectives of proactive invasive species management. If you have any questions, or would like further correspondence on the recommendations expressed, please contact the Ministry of Transportation West Region office, or reach out directly, at [Jessica.Smeekens@ontario.ca](mailto:Jessica.Smeekens@ontario.ca).

Sincerely,

A handwritten signature in black ink that reads "Jessica L. Smeekens". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Jessica Smeekens, R.P.F.  
Vegetation Services Coordinator  
Ministry of Transportation, Maintenance West