

November 15th, 2016

Terese McIntosh
Biodiversity and Wetlands Program and Policy Advisor
Ministry of Natural Resources and Forestry
Policy Divisions, Natural Resources Conservation Branch, Natural Heritage Sections
300 Water Street
Peterborough Ontario, K9J 8M5

Re: Comments on A Wetland Conservation Strategy for Ontario 2016-2030, EBR #012-7675

Dear Ms. McIntosh,

The Ontario Invasive Plant Council (OIPC) applauds the province for moving forward on A Wetland Conservation Strategy for Ontario 2016-2030. However, more emphasis needs to be placed on specific impacts that invasive species, particular invasive plants, have on wetlands. We suggest more actions be identified that can prevent further impacts from invasive plants on wetlands.

As mentioned in the draft strategy, invasive species, including plants, are having a profound impact on Ontario's most fragile and threatened natural ecosystems, including wetlands. The following are a number of comments and associated recommendations on how the strategy can further reduce the impact of invasive plants on wetlands in Ontario:

- If Provincially Significant Wetlands (PSW) continue to be identified, the rate of spread and presence of major invasive plant invasions could significantly reduce the probability of a wetland from being identified as a PSW (e.g. a significant species may have been present, but has been displaced). This would mean fewer PSWs, perhaps leading to further wetland loss. Although it seems counterintuitive, we recommend that an invasive plant presence in potential PSWs not necessarily reduce the perceived value of that wetland (if the function of the wetland has not yet been compromised), and instead it becomes designated as a PSW and a plan is put in place to mitigate the impacts of that invasive plant.
- Although it is important to continue to protect PSWs, it's just as important to continue to protect all wetlands, specifically south of the Canadian Shield. This is due to the fact that wetland loss has been most severe in southwestern Ontario, where over 85% of the original pre-settlement wetlands have been converted to other uses. Losing even more wetlands with a "no-net-loss" approach by 2030 is not acceptable. Therefore, we recommend including specific actions for protecting all wetlands, not just PSWs.
- Under the goal "Increase knowledge about Ontario's wetlands, including their status, functions and vulnerability, to inform and improve conservation" specifically list an action to communicate to the public about wetlands vulnerability to large, invasive plant invasions.

- We also recommend considering providing more dedicated tools and funding to municipalities and Conservation Authorities to undertake much of the work associated with the strategy on behalf of the province. This includes not only conservation of wetlands, but education to the public and management of invasive plants.
- Under the goal “Develop policy approaches and improve policy tools to protect, restore and enhance the quality of Ontario’s wetlands” specifically list an action item about ensuring wetland conservation strategies and tools integrate invasive species management, similar to ensuring the same considerations for something like climate change.
- We encourage the Ministry of Natural Resources and Forestry (MNRF) to continue to work with the OIPC in researching and developing effective controls for invasive plants in wetlands, and utilize our existing Best Management Practices (BMP) documents to support ongoing invasive plant management and our Clean Equipment Protocol to ensure that invasive plant parts are not moved to other sites as a result of management activities.

Failure to specifically address the issue of invasive species within the draft strategy could have dire consequences for the conservation of Ontario’s wetlands.

OIPC is very pleased to see a draft Wetland Conservation Strategy for Ontario 2016-2030 and we look forward to working with the province on wetland conservation and invasive plant initiatives.

Sincerely,



Iola Price, President
Ontario Invasive Plant Council