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**RE: Seeking input on Ministry of Natural Resources and Forestry proposals under Ontario's Invasive Species Act, 2015**

The Ontario Invasive Plant Council (OIPC) is pleased to comment on the list of invasive plants that are proposed for regulation and the proposal to review the potential benefits of regulating the movement of watercraft over land as a carrier under the *Invasive Species Act, 2015* (ISA) and to determine if current education focused on Clean, Drain, Dry principles and practices should be made mandatory through regulation.

The Ontario Invasive Plant Council, founded in 2007, is a multi-sector, not-for-profit corporation committed to helping organizations, communities, and professionals work to more effectively respond to the threat of invasive plants and take direct action to protect Ontario's environment and economy. The OIPC maintains an extensive network of invasive plant managers and experts across the province, including municipalities, conservation authorities, landscape and nursery retailers, consultants and academics. We provide citizens with practical tools and information that makes a big difference in protecting our environment. The OIPC is recognized as a provincial leader in mobilizing and engaging Ontarians, communities and government agencies to undertake prevention and management activities.

We have built a strong working relationship with the Ontario Ministry of Natural Resources and Forestry (MNRF) over the years. MNRF is represented on our Board of Directors in an advisory capacity while other MNRF staff provide valuable input through their participation on committees. Our Board also has representation from municipalities, First Nations, conservation authorities, agriculture, the business community, federal and other provincial government agencies, and non-government organizations.

**MNRF's Six Plant Species Proposed for Regulation**

Invasive species have a serious impact on Ontario's biodiversity as well as costing the economy and society billions of dollars over the past decade. These costs are expected to grow unless significant action is taken. We are therefore pleased to learn that six new invasive plants are proposed for regulation under the Invasive Species Act. We support the proposal by the MNRF

to regulate European Frog-bit (*Hydrocharis morsus-ranae*) as **Prohibited**, and the following plants be regulated as **Restricted**.

- Yellow Floating Heart (*Nymphoides peltata*)
- Carolina Fanwort (*Cabomba caroliniana*)
- Bohemian Knotweed (*Reynoutria × bohemica*)
- Giant Knotweed (*Reynoutria sachalinensis*)
- Himalayan Knotweed (*Koenigia polystachya*)

The OIPC also supports the proposed species-specific rules for plants. By adding plant specific prohibitions in the Act to further restrict the possession, transportation, propagation, sale, and trade of these invasive species, Ontario can become more successful in preventing the introduction and potential establishment of these harmful species.

#### Overland Carrier Transport

We also support the proposal in regard to overland carrier transport. We note that although boats and trailers are not the only way invasive aquatic plants and other species are moved from one waterbody to another, they are a significant vector. For example, European frog-bit can be spread by plant fragments, stolons and turions that are inadvertently carried between waterbodies by watercraft. Eurasian water-milfoil is another example that can spread long distances between waterbodies by boats, boat trailers, fishing gear, and other aquatic equipment. It spreads through waterway connections in cases where lakes are connected by rivers and canals, such as the Trent-Severn Waterway and the Rideau Canal/River system. Preventing the establishment and spread of invasive species is more effective and economical than managing the impacts after an invasive species has established. However, preventative measures should be implemented at a landscape-level scale rather than a single water body.

Strengthening measures to reduce dispersal of invasive species caused by boating activities is very important and implementing regulations should be a strategic priority. Focusing on this mode of dispersal will allow management strategies to focus more on prevention than reaction. Regulation at the provincial level is an important step in ensuring boater etiquette is implemented across waterbodies in Ontario.

Therefore, the OIPC supports the initiative to establish a regulation requiring the removal of all aquatic organisms from the watercraft and that all water is drained from the watercraft as soon as it is removed from a waterbody. Strong consideration should be given to requiring/recommending standard cleaning practices be adhered to in order to remove all aquatic plants from the external and internal parts of boats, trailers and any equipment that has entered the water during the removal process. This is important, as studies in the US have demonstrated that there are frequent inconsistencies in boater cleaning practices and incomplete coverage of monitoring by lake stewards, strengthening the need to implement a more integrated way of thinking. Enforcement might be difficult but is not impossible and signage at boat launches would be an important first step. The creation of a public awareness campaign

such as Clean, Drain, Dry would support behaviour change by empowering recreational users of aquatic resources to help stop the spread of harmful aquatic invasive species. The creation of an Ontario 'Clean Drain Dry' program would align with the messaging currently implemented in British Columbia and several other provinces.

#### Other Plants Proposed for Consideration

In addition to those plants already proposed for regulation under the Act, the OIPC recommends the addition of the Tree-of-Heaven (*Ailanthus altissima*) to the list for immediate regulatory consideration. Ontario's Invasive Species Centre and a number of US sources note that the Tree-of-Heaven, which is invasive in North America, is a favoured host of the Spotted Lantern Fly (*Lycorma delicatula*), an invasive planthopper from Asia, that is under a regulation order by the Canadian Food Inspection Agency. This invasive insect pest is moving north and if Ontario prohibits the further purchase and planting of the Tree-of-Heaven, the potential impacts to Ontario's agricultural (grapes and other fruit crops) and forestry industries (hardwoods) will be reduced.

In Appendix A, we provide brief summaries, in the same form and style (a mini-rationale) as given in the ERO document about each additional species we propose for regulation (see below).

The OIPC suggests that the following species and their subspecies and cultivars be listed and that consideration be given to reviewing existing risk assessments conducted elsewhere in North America (and/or conducting MNRF's own risk assessments immediately or within the coming year).

- Tree of Heaven, (*Ailanthus altissima*)
- White Mulberry (*Morus alba*)
- Flowering Rush (*Butomus umbellatus*)
- Winged Burning Bush (*Euonymus alatus*)
- Oriental/Asiatic Bittersweet (*Celastrus orbiculatus*)
- Norway Maple (*Acer platanoides*)
- Common (*Rhamnus cathartica*) and Glossy Buckthorn (*Frangula alnus*)

These species have been identified recently as priorities for management and the OIPC has recently developed Best Management Practices for six of the above-mentioned species (White Mulberry, Flowering Rush, Winged Burning Bush, Oriental/Asiatic Bittersweet, Norway Maple, Buckthorn). Having these species regulated will provide additional support for their control.

The OIPC also recommends that the MNRF become more pro-active in its addition of invasive species regulated under the ISA. There are over 400 invasive plant species present in Ontario, many of which are introduced through the horticultural trade that greatly influences consumer behaviour and selection. Through the regulation of more species, Ontario can become more successful in preventing the introduction and potential establishment of harmful invasive plants that are not already widespread throughout the province.

In addition, OIPC sees great value in holding stakeholder sessions to gather the necessary information required for species risk assessments as well as identify additional species to be

regulated. Several states (e.g. Minnesota, New York) have implemented similar regulations and the Province of Ontario should consult their species lists and risk assessments to aid in regulating species.

Further Guidance Required Regarding Disposal

Furthermore, more guidance and support surrounding regulations of the ISA is needed. Presently, the MNRF suggests that disposal of regulated invasive species follow the associated species' Best Management Practices documents. However, these recommendations are not necessarily reflective of large-scale site developments dealing with a regulated species, and additional guidance is necessary.

We thank you for the opportunity to provide the Ontario Invasive Plant Council's comments on further species considered for regulation under the *Invasive Species Act, 2015*. We would be pleased to provide further comments and additional information on these and other species.

Yours sincerely,

A handwritten signature in black ink that reads "Belinda Junkin". The signature is written in a cursive, flowing style.

Belinda Junkin  
Executive Director

cc OIPC Board of Directors

Appendix A: Species that the OIPC recommends be added to the list of species regulated (either Restricted or Prohibited according to a Risk Assessment)

<b>Topic</b>	<b>Tree-of-heaven</b> <i>Ailanthus altissima</i>	<b>White mulberry</b> <i>Morus alba</i>	<b>Flowering rush</b> <i>Butomus umbellatus</i>	<b>Winged burning bush</b> <i>Euonymus alatus</i>	<b>Oriental bittersweet</b> <i>Celastrus orbiculatus</i>	<b>Norway maple</b> <i>Acer platanoides</i>	<b>Common Buckthorn</b> <i>Rhamnus cathartica</i> <b>Glossy Buckthorn</b> <i>Frangula alnus</i>
<b>Origin</b>	China	North and central China	Eurasia	Northeastern Asia, Japan, China	East Asia	Continental Europe to the Caucasus	Europe and Northwestern Asia
<b>Distribution now</b>	Most of USA, ON, QC, see USDA map	Widespread in NA; Southern ON	ON, USA	North America, ON	Eastern and Central North America	Much of North America – see USDA map	Widespread in NA; Southern ON
<b>Pathways of Introduction</b>	Horticulture in 1784 USA and subsequent; many seeds- up to 325,000 per tree; grows in variety of soils; rapid above and below ground growth (suckering via long and strong roots); cutting trunks stimulates extensive suckering	USA to start silkworm industry in	Horticulture/water gardens	Horticulture	Before 1879; Horticulture; seeds spread by birds and mammals; widely used in wreaths and often sold as American bittersweet	Introduced to USA in 1756	Introduced in ON as ornamental in 1800s and became widespread in early 1900s
<b>Impacts</b>	Allelopathic, no biological control, no predators (deer) via toxic leaves on decomposition; bark and wood also contain a toxic; early leaf out in some places, late leaf fall in some places outcompetes native vegetation; rapid growth to great heights shades our native species	Outcompetes native red mulberry; hybridizes with red mulberry; may transmit a root disease to native red mulberry	Dominates in shallow waters; displaces native aquatic plants; overwinters as tubers	Dense thickets crowd out native plants, extensive seed production; spread by birds and mammals	Possible hybridization with American bittersweet; twining vine chokes/kills adjacent trees;	Shallow root system and allelopathism lead to loss of native vegetation; very heavy shade producer thus out-competing native trees, especially maples and spring flowers; prolific seed production; grows in soils and under conditions that native trees find hard	Changes nitrogen composition of soil (long-lasting effects on native vegetation); decreases species richness and increases weed/exotic species; prolific seed production; outcompetes native species for light; host to Soybean Aphid (harms agriculture)
<b>Legal status:</b> P = prohibited R = restricted or regulated in some way; O = OIPC BMP	P (MA)	O	O; P (MN)	O	O; P or R by law (KY, ME, MI, MN, NH, NY, NC, and listed in other eastern states)	O	O; P or R by law (IL, MA, MN, NY, NH, VT and listed in other eastern states)

IL = Illinois KY = Kentucky; ME = Maine; MA = Massachusetts; MI = Michigan; MN = Minnesota; NH = New Hampshire; NY = New York; NC = North Carolina, VT = Vermont