



January 4th, 2024

Mr. Stephen Casselman
Manager, Biodiversity and Invasive Species Section
Ministry of Natural Resources and Forestry
300 Water Street, 5th Floor North Tower
Peterborough, ON
K9J 3C7
Canada

Submitted via email: invasive.species@ontario.ca

Re: Renewing the Ontario Invasive Species Strategic Plan

Dear Mr. Stephen Casselman,

Thank you for the opportunity to provide feedback on renewing the Ontario Invasive Species Strategic Plan. This is an important issue for forest managers, given that Ontario is amongst the highest risk for new introductions and has the most invasive species in Canada.¹ The introduction and spread of invasive species can directly impact biodiversity and forest operations by increasing tree mortality rates, resulting in reduced habitat and wood supply availability. As an example, it is estimated that the impact of beech bark disease will result in an overall lost product value of 5 million dollars between 2017-2025.² Furthermore, invasive species can influence a forest's overall health and resiliency, resulting in the forest's ability to provide ecosystem services in the future.

The Ontario Forest Industries Association (OFIA) represents 49 companies across Ontario, managing approximately 32 million hectares of Sustainable Forest License (SFL) area. Ontario's forest industry currently employs 142,000 people across all regions of the province and generates \$20 billion in revenue annually. Through various Boards and Committees, the OFIA provides a unified voice for Ontario's Forest industry with the government and the public.

We recognize the province's efforts to reduce the risk of invasive species as highlighted in the [Ontario Invasive Species Strategic Plan: Review of Progress \(2012–2022\)](#). As the Province renews this strategy, we believe more progress is necessary to “*work with partner agencies to identify and mitigate regulatory obstacles to the detection, prevention, and management of invasive species*”³. The forest industry sees itself as a key partner in addressing the growing challenge of invasive species management, but to better leverage opportunities that exist in our sector, the following needs to be better accounted for in the renewal of the strategy.

¹ Office of the Auditor General of Ontario (2022). Value-for-Money Audit: Management of Invasive Species. Accessed on December 12, 2023. Source: https://www.auditor.on.ca/en/content/annualreports/arreports/en22/ENV_ProvMgmtInvasiveSpecies_en22.pdf

² Office of the Auditor General of Ontario (2022). Value-for-Money Audit: Management of Invasive Species. Accessed on December 12, 2023. Source: https://www.auditor.on.ca/en/content/annualreports/arreports/en22/ENV_ProvMgmtInvasiveSpecies_en22.pdf

³ Ontario Ministry of Natural Resources (2012). Invasive species strategic plan (2012). Accessed on December 12, 2023. Source: <https://www.ontario.ca/page/invasive-species-strategic-plan-2012>

Recognition of Existing Management Frameworks

Management and prevention of invasive and non-invasive forest pests are well integrated into Ontario's forest management planning framework. This includes developing pest programs to inform how operations can help to remove or control an insect pest (e.g., native and invasive). As mentioned in the *Ontario Invasive Species Strategic Plan: Review of Progress (2012–2022)*, MNRF conducts forest health monitoring programs to quantify the extent and severity of major forest disturbances such as weather events, disease damage, and insect outbreaks, including invasive species. Monitoring programs inform management decisions that will promote more resilient and healthy forests, including preventing invasive species from being established or limiting future spread.

Beyond regulatory requirements, all forest certification standards require forest managers to address invasive species and other damaging agents. These standards also have strict requirements pertaining to the planting of exotic tree species to limit the risk of introducing new invasive species.

Climate Change

Ontario's forests are and will continue to experience environmental challenges, facing more frequent and severe weather events and shifting seasonal patterns. These pressures contribute to the proliferation of invasive species. In light of these challenges, we support the Province's efforts, such as updating the Ontario Tree Seed Transfer Policy to better account for changing climatic conditions and promote forest ecosystems' long-term health and resiliency. This policy adaptation reflects a nuanced understanding of the evolving climatic conditions and underscores the commitment to fostering the long-term health and resilience of our forest ecosystems.

By aligning management strategies with the dynamic changes in our climate, these efforts lay a robust foundation for informed decision-making. Many of our member companies have endorsed these principles and actively invested in research that seeks to address these challenges. Our commitment extends to researching innovative forest management tools, with a particular focus on enhancing ecosystem resiliency and health in anticipation of future climatic conditions.

Moreover, we are excited to highlight the forthcoming DIVERSE project (PI: Dr. Christian Messier [UQO]), a pan-Canadian research project that includes 22 research sites (7 in Ontario) that focuses on optimizing taxonomic, genetic, and structural diversity and connectivity among stands to promote adaptability and resilience at both stand and landscape scales. The project is funded by various forest stakeholders, including partnerships with First Nations, the forest industry (including several OFIA member companies), federal and provincial government agencies (including MNRF), NGOs, and over 50 national and international scientific collaborators.

Endangered Species Act

The forest sector is uniquely positioned to support species at risk recovery in its ability to promote habitat conditions through harvest and regeneration techniques. However, for species listed under the Endangered Species Act, 2007 (ESA), habitat and species protection tends to be the default approach for species recovery.

In many cases where a species is listed due to the threat of an invasive species, a lack of habitat is often not the primary threat or concern. Recovery Strategies and Government Response Statements under the ESA, typically focus on habitat protection measures defined in the ESA and struggle to adapt and apply to these situations. Furthermore, a standardized, blanket approach focused on habitat protection across the province is unlikely to be effective and can lead to significant socioeconomic impacts with limited benefits for species recovery.

In the case of Black Ash, we were pleased to see that the proposed protection measures were targeted to portions of the province that are most impacted by Emerald Ash Borer (EAB) and consider existing measures to support the sustainability of habitat conditions – in addition to professional reliance (e.g., RPF). **We would encourage the Province to consider forest management techniques as a tool to support species-at-risk recovery, such as active forest management techniques, to better address the threat of invasive species more proactively and effectively in the future.**

Active Forest Management

Where there is a threat of invasive species, a quick response is required for intervention approaches. Active forest management techniques are an effective management tool that can limit the spread of invasive species and reduce the risk of introducing them into other regions. The forest management planning framework needs to allow for a swift response of active forest management techniques to prevent further wood supply and biodiversity impacts in areas experiencing invasive species. **As such, we recommend that the Province (in collaboration with MNR and MECP) identify and address barriers associated with using proactive forest management solutions.**

In some cases, such as where Phragmites are introduced, there are limited options, apart from herbicides, that have been proven effective in limiting spread into other regions. **Given this, where invasive species are introduced, we encourage the Province to enable the use of herbicides, particularly where there are limited alternatives to limit spread into other regions.**

We also recommend that the Province identify regulatory barriers to investing in the necessary infrastructure to prioritize harvests in regions heavily impacted by or at the highest risk. There are significant benefits in applying a proactive, risk-based approach (where appropriate) as it can help limit the spread and introduction of invasive species while utilizing wood fibre in essential products for Ontarians.

Post-Disturbance Techniques/ Restoration

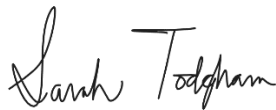
Where there is an invasive species infestation, there is also an opportunity to utilize the decaying trees to capture the carbon into wood products, which would otherwise be released back into the atmosphere. Furthermore, salvage or restoration operations can be particularly beneficial in protecting communities and important habitat types by reducing the risk of future fires. For example, the Alberta [Jasper National Park Fuel Reduction Project](#), a forest company, was contracted to undertake a large-scale fuel reduction program in the regions heavily impacted by the mountain pine beetle infestation and better protect the surrounding community from fire risk using FireSmart techniques.

A significant barrier to forest companies' ability to do more proactive restoration projects is the increased costs to undertake these operations and the time it takes to obtain salvage harvest permits. The feasibility

of these operations is also limited by a short timing window to access the decaying timber before it is no longer merchantable and to ensure the safety of workers conducting the harvests. Reducing barriers to conducting salvage operations can also help support faster regeneration of forests post-disturbance, leading to quicker renewal of certain habitat types for species at risk, such as boreal caribou. Compared to other jurisdictions, Ontario tends to have longer turnaround times for salvage permit approvals. As such, **we recommend that Ontario work with industry partners to identify and overcome barriers to implementing more strategic and proactive post-disturbance restoration projects (e.g., FireSmarting communities).**

We appreciate the opportunity to provide input on renewing the Invasive Species Strategic Plan. As highlighted within this submission, the forest sector is well positioned to be a key partner in supporting the Province in mitigating and managing the threat of invasive species, particularly when addressing the key considerations mentioned in this letter to enable future opportunities. We welcome the opportunity to meet with you (or anyone within your department) if there are any follow-up questions on the information provided in this submission. I can be reached at 519-933-1231 or stodgham@ofia.com.

Thank you,



Sarah Todgham, R.P.F.
Policy Manager
Ontario Forest Industries Association
C: 519-933-1231
E: stodgham@ofia.com