



**ONTARIO  
RIVERS  
ALLIANCE**

379 Ronka Road  
Worthington, ON P0M3H0  
LindaH@OntarioRiversAlliance.ca  
OntarioRiversAlliance.ca

14 April 2014

Donna Wales  
Policy Advisor  
Ministry of Natural Resources  
Policy Division, Biodiversity Branch  
Biodiversity Policy Section  
300 Water Street  
Peterborough, ON K9J 8M5

By Email: [Donna.Wales@Ontario.ca](mailto:Donna.Wales@Ontario.ca)

Dear Ms. Wales:

**Re: Invasive Species Act  
EBR 012-1120**

Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization acting as a voice for the French River Delta Association, CPAWS-Ottawa Valley, Kiishik Community Association, Food & Water First, Whitewater Ontario, Vermilion River Stewardship, Friends of Grassy River, Mississippi Riverwatchers, French River Stewardship, as well as many other stewardships, associations, and private and First Nations citizens who have come together to protect, conserve and restore healthy river ecosystems all across Ontario.

ORA offers our support on the proposal to enact an Invasive Species Act (Bill 167), and to emphasize the importance of a proactive approach to minimize the possibility of intentional and unintentional introductions of alien and invasive species, and of mitigating the effects of species that have already been introduced.

For the Invasive Species Act to be effective, it is important that this legislation is accompanied by invasive species policies and implementation plans, along with collaboration between the Ontario government, ministries, agencies, municipalities and federal authorities, along with adequate funding, staff and required resources that are dedicated to the successful application of the policies and action plans. It is crucial that invasive species policy be incorporated into all decision-making processes throughout all pertinent government agencies in order to protect the economic, social and ecological integrity within all of Canada.

It is vital for legislation to ensure that not just commercially significant natural resources are protected, but that all of Ontario's ecosystems are protected. It is also important that legislation ensures all new species are assessed to determine their potential impact on our native ecosystems, as well as a requirement for existing legislation to be reviewed regularly.

ORA strongly supports the need for invasive species legislation, however, we feel it is important to strengthen the Bill to ensure it more effectively prevents the introduction of invasive species

**“A World of Healthy River Ecosystems”**



in Ontario, and for the removal of threats from existing or introduced species. To achieve this, ORA offers the following recommendations:

- The Bill include a purpose section that clearly articulates what the Bill intends to address.
- Prevention is the most effective and economically feasible approach. ORA suggests that the introduction of any alien species should be prohibited unless and until an environmental assessment of its potential to cause harm has been conducted.
- The listing process should be based on best available science, rather than left to the discretion of the Lieutenant Governor in Council, should be automatic under the Act, and any government response to the listing consider socio-economic factors.
- Provision for cooperative agreements between the different levels of government, and the provinces, along with an agency mechanism designed to accomplish this, be provided for in this Bill.
- ORA also wishes to stress the importance of adequate funding for MNR's ability to monitor and enforce its responsibilities under the Act.
- Add the words "or permit" to sections 7 and 8.

ORA also wishes to support Ecojustice's 3 April 2014 submission, and their 2004 Ecojustice report entitled "*A Legal Strategy to Protect Canada's Ecosystems and Economy from Alien Invasive Species.*"

Thank you for this opportunity to comment.

Respectfully,

Linda Heron  
Chair, Ontario Rivers Alliance  
(705) 866-1677