



May 19, 2021

Public Input Coordinator
MNR - Fish and Wildlife Policy Branch
300 Water Street
P.O. Box 7000
Peterborough, ON K9J 8M5

Re: ERO number 019-3465

For 20+ years, FOCA has been educating and advising Ontario's waterfront property owners about the risks from invasive species in and around Ontario's lakes. Between them, this group of enthusiasts owns and uses over 500,000 boats across all parts of this province.

We write today in support of regulating the movement of watercraft over land under the Invasive Species Act, 2015. The primary focus of this effort will make "Clean, Drain, Dry" principles and practices mandatory to improve and augment the ongoing education and outreach to boaters.

FOCA remains very concerned about the potential impacts of introduced species and the effect they can have on our quality of life in Ontario. We have already seen the impacts from the many existing and looming invasive species introductions, including forest pests like the Emerald Ash Borer, and aquatics like the Zebra Mussel and Round Goby. These invaders have proven to alter the environment, damage our economy, and negatively impact our communities.

For years we have advised visitors and residents of waterfront communities to take steps to prevent the spread of invasive species in cottage country, including:

- garden using only non-invasive plants
- disposing of bait properly
- buying firewood locally
- inspecting and cleaning boats & motors when changing water bodies
- monitoring lakes and waterfronts, and taking action to stop the spread of invasive species.

The boater pathway has been identified as the single greatest avenue for undesirable and harmful species to make their way from lake to lake. Despite many years of ongoing outreach and education by FOCA and others, the unregulated movement of boats continues as a major threat.

Many neighbouring jurisdictions have the force of law behind their invasive species / boater issues, including Michigan, and Minnesota. In Canada, Alberta has taken strong measures to prevent unwanted species from destroying their aquatic resources.

We understand the objectives of the Invasive Species Act, 2015 are to:

- prevent new invasive species from arriving and establishing in Ontario, and;
- reduce the harm posed to the natural environment and economy by those that are already here.

To support these objectives, the Act:

- regulates invasive species as prohibited or restricted, and may apply prohibitions regarding their introduction, possession, sale, transportation, etc.
- gives the government authority to take action to reduce or eliminate the negative environmental impacts of regulated invasive species.

The Act also provides the authority to regulate carriers (pathways) of invasive species to reduce the likelihood that invasive species will be spread through these pathways.

We are in support of the inclusion of the new species being reviewed as part of the update of the Act.

While we appreciate the proposed revisions to targeted and species-specific measures, FOCA is most focused on the most common human vectors – which, if addressed well, will be useful to prevent the spread of many aquatic invaders simultaneously.

That is why we are supportive of the benefits of regulating the movement of watercraft over land as a carrier under the Invasive Species Act, 2015.

Mandatory obligations on boaters will better protect our lakes and rivers, and will improve regulatory consistency among jurisdictions across Canada and in the Great Lakes basin.

The movement of watercraft overland to different bodies of water is a known pathway contributing to the spread of aquatic invasive species. To date, Ontario has relied on educational activities to reduce the spread of invasive species through this pathway. However, public reporting and ministry surveys indicate that various invasive species continue to be introduced to new bodies of water in Ontario.

Our strong urging is to include regulating the movement of watercraft over land under the Invasive Species Act, 2015 as part of ERO number 019-3465.

Sincerely,

Terry Rees

On behalf of FOCA