

January 4, 2024

DELIVERED VIA EMAIL: invasive.species@ontario.ca

Public Input Coordinator
MNRF - Biodiversity and Invasive Species Section
300 Water Street, 5th Floor North tower
Peterborough, ON K9J 3C7

Re: Renewing the Ontario Invasive Species Strategic Plan
ERO Number 019-7582

Please accept this submission of AEL Advocacy in response to ERO Number 019-7582.

A. About AEL Advocacy

Animal Environmental Legal Advocacy (“AEL Advocacy”) is a public interest law practice and not-for-profit organization based in Ontario. Our lawyers understand the important interconnection between humans, animals, and the environment. We combine our in-depth knowledge of the legal and political landscape with a commitment to supporting individuals and organizations working to protect animals and the environments where they live.

B. Comments on Renewing the Ontario Invasive Species Strategic Plan

AEL Advocacy supports the Ministry of Natural Resources and Forestry's proposal to renew the Ontario Invasive Species Strategic Plan. The following comments and recommendations are offered to guide the development of the renewed plan:

I. Vision and Opportunities for Future of Invasive Species Prevention and Management in Ontario

Recognizing Ontario's elevated risk for new species introductions and its standing as the Canadian province with the highest number of invasive species, it is imperative to adopt a comprehensive and forward-looking

strategy.¹ The recently conducted 2022 Audit of Management of Invasive Species in Ontario underscored critical deficiencies in the Ministry's current approach.² Key concerns include the necessity for swift regulation following assessments, the fortification of laws focusing on prevention, a risk-based monitoring approach for invasive species, clearly defined roles for municipalities and conservation authorities, enhanced collaboration with federal partners, inclusive guidance for municipalities, expedited funding approval, comprehensive training for conservation officers, and the reallocation of funds to address human resource shortages.³

In addition, we advocate for an integrated approach that considers the implications of climate change in invasive species management. Acknowledging the dynamic challenges presented by shifting climate patterns and evolving habitats is paramount for a robust strategy.⁴

AEL Advocacy strongly recommends that the renewed strategy prioritizes animal welfare considerations. The current methods of invasive species control often result in undue stress, trauma, and suffering for the targeted animals.⁵ Striking a balance between effective invasive species management and humane treatment of all animals, including invasive species, is crucial.⁶ This ethical dilemma is evident in existing laws that may inadvertently allow inhumane practices, exemplified by events like coyote killing contests. Our recommendations include a focus on humane alternatives and alignment with the principles of the compassionate conservation movement.⁷ Emphasizing a thoughtful assessment of potential courses of action that prioritizes the well-being of all wildlife is paramount. Successful examples of non-lethal control methods, such as fencing, livestock guardian angels, scare tactics and foxlights, demonstrate the potential for mutually beneficial outcomes in wildlife conservation.⁸ Achieving this balance is essential for effective invasive species management while upholding ethical standards in animal treatment. As the Ministry develops the renewed Ontario Invasive Species Strategic Plan, the commitment to “Do No Harm” and the recognition

¹ https://www.auditor.on.ca/en/content/annualreports/arreports/en22/ENV_ProvMgmtInvasiveSpecies_en22.pdf

² https://www.auditor.on.ca/en/content/annualreports/arreports/en22/ENV_ProvMgmtInvasiveSpecies_en22.pdf

³ https://www.auditor.on.ca/en/content/annualreports/arreports/en22/ENV_ProvMgmtInvasiveSpecies_en22.pdf

⁴ <https://www.invasivespeciescentre.ca/invasive-species/what-is-at-risk/climate-change/>

⁵ <https://animaljustice.ca/blog/invasive-species-act-silent-animal-welfare>

⁶ <https://animaljustice.ca/blog/invasive-species-act-silent-animal-welfare>

⁷ <https://thevarsity.ca/2023/10/22/the-tradeoff-between-conservation-and-animal-welfare/>

⁸ <https://law.lclark.edu/live/profiles/15694-animal-welfare-considerations-in-invasive-species>

of the intrinsic value of all wildlife should guide their policy decisions, ensuring a harmonious co-existence with nature.⁹

II. Barriers Related to Invasive Species Prevention and Management in Ontario

The Review of Progress (the “Review”) aptly identifies the challenges posed by climate change in preventing and controlling invasive species. Ontario’s unique environmental conditions not only facilitate the introduction of invasive species but also provide an ideal setting for their proliferation.

The Province’s current environmental policies, particularly the modifications to the “Made in Ontario Plan for the Environment” of 2018, present a barrier related to invasive species prevention and management by appearing to diminish the urgency of climate action.¹⁰ The 2022 revision of this plan notably deviates from the initial targets set for greenhouse gas emissions reduction. This shift indicates a retreat from a more aggressive climate strategy, which is essential for addressing the root causes of invasive species spread. Moreover, the introduction of the Ontario Carbon Trust in 2018, following the discontinuation of the cap-and-trade program, is conspicuously absent in the revised environmental plan. This omission raises questions about the government’s commitment to tangible and effective climate action.

The direct link between climate change and the proliferation of invasive species cannot be overstated. The current strategies, as they stand, do not adequately address the severity of the climate crisis. This oversight significantly hampers the ability to effectively manage and prevent invasive species.

To truly tackle the issue of invasive species, a robust and forward-thinking approach to climate change is imperative. The government’s strategy must prioritize comprehensive climate action as a foundational element in managing invasive species. Failing to do so not only undermines the efforts in biodiversity conservation but also poses a continuing threat to the ecological and economic well-being of Ontario.

⁹ <https://thevarsity.ca/2023/10/22/the-tradeoff-between-conservation-and-animal-welfare/>

¹⁰

https://prod-environmental-registry.s3.amazonaws.com/2022-04/Ontario%20Emissions%20Scenario%20as%20of%20March%2025_1.pdf

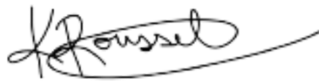
C. Conclusion

AEL Advocacy is in favour of the Ministry renewing the Ontario Invasive Species Strategic Plan. **However, we urge the government to reconsider its current approach and align its environmental strategies with the pressing need for strong climate action and compassionate conservation. The future of Ontario's ecological balance depends on it.**

We welcome the opportunity to discuss the above comments and recommendations.

Sincerely,

AEL Advocacy



Krystal-Anne Roussel
Co-Director & Counsel



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