

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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Mr. Hugh Lougheed
Crown Forests and Lands Policy Branch
Ministry of Natural Resources and Forestry
70 Foster Dr, Suite 400
Sault Ste Marie, Ontario
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Dear Hugh:

Subject: ERO #019-1005 Discussion paper: Developing strategic direction for managing forest pests in Ontario

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers and supporters, and 725 member clubs. We have reviewed the discussion paper "Developing strategic direction for managing forest pests in Ontario" and offer the following comments for consideration.

The OFAH is supportive of the MNRF developing strategic direction for managing forest pests in Ontario and are pleased to see a recognition of the importance of hunting, fishing and other recreational activities. Forest pests, including native and invasive insects, diseases and plants, have the potential to negatively impact Ontario's environment, economy and societal values. Currently, Ontario does not have an effective and comprehensive system in place for the management of forest pests, particularly invasive forest pests. This discussion paper is a good starting point, but lacks necessary detail about how risk-based direction will be implemented. The process for responding to a forest pest outbreak must be clearly defined and resources need to be able to be leveraged rapidly in the event of a response. A risk-based approach is an efficient way to prioritize the timing and scale of response, but there needs to be more clarity on how forest health and human values will be weighed when determining risk.

Ontario has various pieces of legislation that can be engaged in a coordinated fashion to minimize the impact of forest pests. The Crown Forest Sustainability Act, the Invasive Species Act, the Environmental Assessment Act, and the Endangered Species Act should all be harnessed to their fullest extent to prevent forest pest outbreaks and their impacts on biodiversity, wood supply, species at risk, and recreational values such as hunting and fishing.

The OFAH acknowledges the value of forest pests in renewing forest ecosystems, including positive benefits for wildlife habitat. The strategy proposes to prioritize pest events that pose the greatest risk to forest health and human values, and states that low impact outbreaks will not be actioned. Will inaction also apply to novel and/or invasive forest pests, or is this statement limited to native forest pests?

Discussion Questions:

1. How important is it to you that the province maintain an active role in forest pest management?

The province should maintain primary responsibility for forest pest management, but should also actively engage with other levels of government and non-governmental organizations (NGOs). The scope of forest pest management needs to include the entire province, not limited to Crown forests. The MNRF needs to have resources and tools at their disposal to be able to predict and respond to outbreaks of native forest pests and introductions of invasive species, but they also have a large role to play in facilitating management and response activities by municipalities, NGOs, and private landowners. Many invasive forest pests are not introduced directly to forests - they often spread from other jurisdictions via international wood packaging or through the horticultural trade. If a forest pest is found in a municipality, the province must be able to provide expertise and staff resources to assist in control and eradication. There are many examples of existing invasive forest pests in Ontario, such as the Emerald Ash Borer, that have spread rapidly because municipalities and private landowners had no feasible way to manage the problem. This creates a patchwork approach to management and refuge areas for forest pests, which impedes control efforts.

2. What are the effects of forest pests that most concern you?

Forest pests have the potential to cause widespread loss of biodiversity and ecosystem services which, in turn, can have negative impacts on fish and wildlife and their habitats. Many forest pests target specific tree species which has the potential to remove an entire species from the forest. The loss of a single or related group of species can have damaging effects on habitat, soil nutrients and ecosystem structure in addition to potential economic and social losses. This threat is significantly greater when silviculture practices result in forest monocultures. Selective re-planting and aerial spraying can result in forest patches with low species diversity. Due to the ever-growing risk of forest pests and the uncertain impacts of a changing climate, biodiversity and resiliency must be incorporated into forest practices. In addition to the direct damage caused by forest pests, invasive plants can dominate understories, completely changing the forest composition and reducing forage for native wildlife. The OFAH is concerned about the conservation of Ontario's native ecosystem composition and functioning, and forest pests have the potential to compromise that.

3. What specific aspects of forest pest management would you like to see improved? (in order of priority)

Response

The OFAH encourages the government to develop response plans for native and invasive forest pests that have been identified as high risk through the risk assessment process. Response plans should be developed in collaboration with all jurisdictions and NGOs that could play a role in the response actions. Known native forest pests should have very specific response plans that are scalable depending on severity of outbreak. Response plans for predicted invasive species should also be as specific and detailed as possible, using information from jurisdictions that have already dealt with the introduction of a particular species. The government should also develop a generic response plan that can be adapted in the event that an unpredicted and unknown invasive species becomes introduced to Ontario. All response plans should identify resources required to adequately implement required actions, including support for municipalities and private landowners, where appropriate.

Risk Assessments

As the strategic direction for managing forest pests outlined in this discussion paper will follow a risk-based approach, robust, evidence-based risk assessments are essential. Risk assessments should be based on potential risk to the environment, economy, and society; these three categories should all be evaluated and reflected in the decision-making process. Due to the potential for the introduction of novel forest pests, the OFAH would like to caution the MNRF against using the absence of a risk assessment as a reason for inaction. It is neither practical nor efficient to create a risk assessment for every potential forest pest, so there must be a way to fast track response to species that do not have risk assessments in order to prevent establishment of the pest (i.e. emergency situations).

Also, there are many species that are already present in Ontario that negatively affect forests. These species should still be included in the risk-based approach and managed to the same degree that a new species in that risk category would be. Pathways of spread should also be evaluated under a risk-based approach to better predict the pathway through which forest pests enter and spread.

Prevention

With respect to invasive forest pests, preventing harmful introductions before they occur is cost effective and avoids significant long-term economic, environmental and social impacts. It is important that the proposed risk-based approach not only identifies and assesses the risk of potential invaders before they arrive, but also informs public education initiatives and pathway management policies to ensure we mitigate introductions and spread. While there are great resources on how to prevent spreading forest pests (e.g. Clean Equipment Protocol, Don't Move Firewood) there is very little enforcement of these policies. Active management of pathways for introduction and spread is essential to preventing forest pests from having major impacts.

Communication

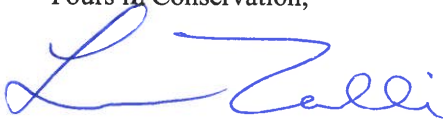
The communication actions in the discussion paper only include making information available online, but we feel that this is insufficient to improve communication of forest pest information to the public. The OFAH agrees that Ontarians need to better understand forest pests, especially the difference between native forest pest cycling and invasive species. The Invading Species Awareness Program Hotline receives numerous calls during native forest pest outbreaks (e.g. forest tent caterpillar) because people assume that they are invasive. The MNRF needs to better predict outbreak years and pre-emptively communicate that to the public, explaining what the pest is, its ecological role, and what (if anything) the public can do to reduce numbers on their trees. In addition to public communication they also need to improve their communications with partners and other jurisdictions. When native pest outbreaks happen, the MNRF should be distributing information to affected municipalities and relevant NGOs. Communications should be improved between the MNRF and municipal governments so they are clear about their role in invasive species management. Often it is the responsibility of the municipality, but they lack information on identification, prevention, reporting, monitoring and management. If the MNRF will not take the lead in these situations, they need to provide the municipality with the necessary information for them to be effective.

For 28 years, the Ontario Federation and Anglers and Hunters and the Ministry of Natural Resources and Forestry have partnered on the Invading Species Awareness Program (ISAP) in order to address the increasing threats posed by invasive species in the province, including forest pests. The program excels at generating education and awareness materials focused on invasive species and facilitating monitoring and early detection initiatives for invasive species found within Ontario. Due to the important role of the program in prevention and communication, we strongly urge the government to renew their commitment to the partnership, including the restoration to previous funding levels and multi-year agreements.

Conclusion

The OFAH is supportive of the direction outlined in the discussion paper, but wants to ensure that the MNRF has the resources to be able to implement the ideas that they have presented. The OFAH looks forward to providing comments on the policies that come out of this discussion paper and offer the invasive species expertise of our Invading Species Awareness Program in the development of those policies moving forward. Thank you for considering these comments.

Yours in Conservation,



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Resource Management Specialist

LT/jb

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