



## Invasive plant regulation follow-up letter

Tuesday, September 12, 2023

Dear Anthony, Wendy, Karen, Erin, and Diana,

Thank you for meeting with our CCIPR team on Thursday August 24<sup>th</sup>. We appreciated your supportive words about our initiative to reduce the sales and spread of invasive plants via the horticultural trade. However, within the limits of the time available, we were not able to address many outstanding questions.

First, we would like to ensure that our whitepaper has accurate information. In your letter of June 30, 2023, you mention that “certain statements related to the delivery of the CFIA’s plant protection mandate and international obligation were not represented accurately.” Please share how you think these statements should be updated.

Next, we wish to share the following observations:

- **The focus** of the *PPA* and *Seeds Act* and of CFIA are plant health and plant pests for phytosanitary purposes. The prioritization of work on risk assessments and outreach is on pests that impact economic sectors vs the environment. For example, there is action and outreach on boxwood moth, a pest that only affects a horticultural product (boxwood), yet no action has been taken on several invasive plants causing huge impacts to Canadian ecosystems like the knotweed complex (*Reynoutria* spp.) or the watermilfoils (*Myriophyllum* spp.).
- Current regulations fail to address the primary pathway for invasive plant introductions, namely the horticultural industry. Biodiversity and human health consequences are largely ignored.
- The 2008 *Canadian Invasive Plant Framework: A Collaborative Approach to Addressing Invasive Plants in Canada* charged the federal government with preventing the entry of species not yet in Canada and devolved regulatory authority for “**widespread**” plants to other levels of government. This policy has not effectively managed invasive plants.
- DFO recognized the need for interprovincial AIS regulations and drafted new legislation ([2015](#)). The authority for regulating invasive aquatic plants remains unclear.
- The CFIA removed regulations on several high-risk aquatic invasive plants in 2002 and has failed to restrict the movement of nationally significant aquatic plant risks identified by the DFO like Carolina fanwort, flowering rush, and yellow flag iris.
- ECCC manages chemical substances in a comprehensive manner under the CEPA. The ECCC model used to assess and regulate substances should be applied to invasive plants. An improved regulatory framework with additional resources is required to make this happen.

- The list of plants included in the CFIA’s [WRA documents list](#) is not comprehensive. Many known high-risk plants are missing. Few high-risk plants have been regulated.
- Based on correspondence with CFIA and ECCC to date, there seem to be no plans to reduce the sales and movement of invasive plants threatening Canada’s biodiversity.
- **Canadians expect better.**

Finally, we have a series of questions:

- “Open and interoperable information systems will improve the coordination and effectiveness of management of biological invasions, within and across countries,” (IPBES, [2023](#)). A national repository for information on invasive plants is essential to support the activities of federal and regional governments, Indigenous communities, and non-governmental organizations. **What are the barriers preventing the CFIA from creating a national database?**
- **What are the sources for plants** appearing on the [WRA documents](#) list and how are they selected? For instance, we note *Berberis* is regulated, but not listed. Why are knotweeds (*Reynoutria* spp.) not present?
- We agree that education is important. **Is the CFIA pursuing point-of-sale labelling to educate the public about the risks of invasive plants?**
- While important, education is **not sufficient**. The DFO noted regulatory inconsistencies across the country and “important gaps that could **only** be filled through federal regulations, such as prohibitions against the interprovincial movement of AIS or their importation into Canada” ([2015](#)). **What changes are planned to ensure equitable protection for all of Canada?**
- **What is your action plan to address the trade and movement of high-risk plants of national significance** like autumn olive, burning bush, invasive honeysuckle?
- Given that the CFIA works proactively with the IPPC and NAPPO, **how has policy been improved to reflect current guidelines from the IPPC to address harm to the environment?**
- Have you modernized the interpretation of the terms “widespread” and “economic harm” in accordance with current International Standards for Phytosanitary Measures (ISPMs)? If so, **will plants like floating yellow heart be reassessed?**
- You stated that your department does not have the human resources necessary to screen plants and cannot adequately deal with the problem. Given this fact, **what is your plan to acquire the necessary resources?**

To further this discussion, we have created a spreadsheet showing plants regulated in Canada and in the bordering U.S. states ([uploaded here](#)\*). To this list, we have added plants appearing in the CFIA WRA Documents and invasive aquatic plants assessed as high-risk by the DFO. This spreadsheet illustrates inconsistencies and irregularities in the regulatory processes. We created a high priority list. We suggest that the CFIA add these invasive plants to its screening list along with those from [invasive species councils](#), the [Invasive Species Atlas](#), and those plants of international concern noted in the IPBES report like Japanese knotweed, tree-of-heaven, salt

cedar, and water hyacinth. Collating these lists is the first step in developing a national repository of invasive plants.

We look forward to hearing from you and will issue an update of our whitepaper when we receive your clarifications.

Best regards,  
**CCIPR team**

\*The link directs you to a CCIPR.ca resource page, which we will update over time. The current spreadsheet is [here](#) (XLSX file will download).

Ref:

Minister of Fisheries and Oceans. [2015](#). Aquatic Invasive Species Regulations. Canada Gazette 149(12).

IPBES. [2023](#). Summary for Policymakers of the Thematic Assessment Report on Invasive Alien Species and their Control of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. Roy, H. E., Pauchard, A., Stoett, P., Renard Truong, T., Bacher, S., Galil, B. S., Hulme, P. E., Ikeda, T., Sankaran, K. V., McGeoch, M. A., Meyerson, L. A., Nuñez, M. A., Ordonez, A., Rahlao, S. J., Schwindt, E., Seebens, H., Sheppard, A. W., and Vandvik, V. (eds.). IPBES secretariat, Bonn, Germany.

IPBES. [2023](#). Key Tables from full report.