

CCIPR Invasive Plant Regulation Follow-up

Inbox

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to Anthony, Kristina, Cheryl, Bruno, Canadian, Wendy, candijeronimo@gmail.com, Erin, Di

Dear CCIPR Team:

I am writing to you to provide additional input on the CCIPR's white paper, *Reducing the Sales of Invasive Plants in Canada: to safeguard biodiversity and human health*.

As mentioned in Anthony Anyia's last letter, we noted that certain concepts in the white paper related to the delivery of the Canadian Food Inspection Agency's (CFIA) plant protection mandate and international obligations were not represented accurately. In addition to the input we have provided during our several meetings and e-mail exchanges, I would like to provide the following general comments:

1) **Environmental Impacts:** The scope of the *Plant Protection Act* includes the protection of plant life in Canada. The CFIA's Invasive Plants Policy and plant protection directive D-12-01 confirms the inclusion of environmental considerations in its application of the act. From the CFIA's perspective, there is recognition that invasive species pose a threat to Canada's environment. This recognition is explicit in our Invasive Plants Policy. I would like to clarify that the CFIA's plant health risk assessment process considers both the economic and environmental impacts of invasive plants. Environmental concerns have always been considered in this process and will continue to be an important factor when determining if an invasive plant qualifies for regulation. *Pueraria montana* and *Arundo donax* are examples of regulated invasive plants, which can cause serious environmental impacts, including significantly reducing biodiversity.

2) **Regulatory tools:** I would like to reiterate that regulatory tools alone are not sufficient to address the invasive plants problem. The CFIA exercises authorities according to the Agency and Government of Canada priorities. However, there are limits to legislative authorities. New and existing industry, municipal, provincial/territorial and invasive species councils-led initiatives and programs are critically important to address these areas of concern alongside existing regulations. The CFIA continues to encourage the adoption of the National Voluntary Code of Conduct for the Ornamental Horticultural Industry and other industry-led initiatives such as Plant Wise and Grow Me Instead. We do not envision these as a short-term measure, but rather stakeholder-led long-term action.

3) **Prevention:** The focus of CFIA's Invasive Plant Program has consistently been on prevention, based on the control costs associated with invasive species once they are introduced. The CFIA's resources have the greatest impact when they are directed toward preventing new pests from entering and establishing in Canada. As such, the CFIA prioritizes species that are not yet present or present with limited distribution, so that "official control" is possible.

4) **Risk Assessments:** Preliminary evaluations are conducted for new species related to import requests as well as species of interest brought to our attention through environmental scanning, including those in the ornamental pathway. Should the preliminary evaluation identify species of invasive concern, further risk assessment and analysis are needed to determine regulatory status. These analyses are the basis for considering the invasive plant species to add to our Directive D-12-01, regulated pest plant list in Appendix 1. When new information becomes available, previous risk assessments and related decisions are revisited on an as-needed basis.

5) **Convention on Biological Diversity:** The CFIA contributes to the Convention on Biological Diversity activities and related indicators. Most notably, the CFIA is engaged in the development of the [Canada's 2030 National Biodiversity Strategy](#) and fully anticipates to be one of the Canadian contributors to the [Kunming-Montreal Global Biodiversity Framework's target 6](#) concerning invasive alien species.

6) **Cost of Invasive Plants:** As was mentioned in the white paper, the environmental costs associated with invasive plants are very difficult to quantify, as it is challenging to enumerate the benefits of nature. The CFIA will continue to conduct work on economic analysis and valuation of ecosystem services. This is anticipated to be a collaborative effort with other federal departments, provinces, territories and invasive species organizations such as the Canadian Council on Invasive Species.

7) **International Obligations:** Principles and standards of the International Plant Protection Convention (IPPC) do not interfere with the CFIA's ability to regulate invasive plants. To the contrary, the IPPC recognizes the ability of countries to regulate plants as pests, helping to prevent the movement of these pests through international trade. This in turn protects Canada's plant resources.

I trust that these comments will help you to finalize your white paper. Please note that our comments do not constitute an endorsement of your paper. I hope it has been broadly shared with the horticulture industry members that have the capacity and connections to support the implementation of its recommendations.

The CFIA will continue to enhance its Invasive Plants Program, as described above, and to support existing initiatives such as the Plant Wise Program and the Ornamental Code of Conduct. This includes a continued focus on prevention, as well as raising

awareness of materials and initiatives that encourage the sale of non-invasive plant species.

Lastly, I wish to clarify our Listserv process and the addition of the CCIPR to the CFIA distribution list. It is best that you add your email address, if you have not already done so, through the CFIA's notifications website at: <https://notification.inspection.canada.ca/> .

I thank you again for your continued efforts to raise awareness of invasive plants and their impacts.

Sincerely,

Wendy Asbil

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