

March 10, 2017

Mr. Paul Glover
President, Canadian Food Inspection Agency
1400 Merivale Road, Tower 1, Floor 6
Ottawa, ON, K1A 0Y9
Paul.glover@inspection.gc.ca

Re: Comments on RMD-16-02: Pest Risk Management Document for *Arundo donax* (giant reed) in Canada

Dear Mr. Glover,

The Ontario Invasive Plant Council (OIPC) applauds the CFIA for requesting comments regarding the Risk Management Document examining the risk associated with importation, cultivation and trade of *Arundo donax* in Canada. We respectfully submit the following comments and recommendations for your consideration.

1 Organism Status

Recommendation

Since this species is already found in northerly US states, the CFIA should see this as a concern since it's at Canada's borders. The CFIA should reach out to these states to obtain their feedback as well.

2 Pest Risk Assessment

- a. The OIPC is unsure why the plant is still allowed into Canada if there have been previous risk assessments completed (2006) that concluded that the plant poses a risk to Canada.

Recommendation

Finalize this risk assessment with a decision to prohibit its entry as soon as possible.

3 Probability of Establishment

- a. Considering this species is hardy in five hardiness zones in Canada and that some cultivars have a higher establishment potential than the standard ecotypes is a large concern for OIPC, especially since most of Canada's productive agricultural land falls within USDA Zone 4.

Recommendation

The OIPC recommends that this alone be evidence to restrict the entry into and growing of this species in Canada.

4 Probability of Spread

- a. Since introduced *Arundo donax* spreads mostly by vegetative means, allowing it into Canada will mean that it will spread easily through farm practices and harvesting, resulting in new infestations. It's also possible that viable seeds from other areas will be brought in.

Recommendation

The OIPC recommends that the CFIA take the probability that it will spread very seriously and that the parallels of this plant with *Phragmites australis* and its ability to spread rapidly, be taken into consideration in prohibiting this species into Canada.

5 Biofuel

CFIA should consider that Canada already grows a number of species for biofuel and that another species with environmental risks should not be permitted entry and use.

6 Previous Imports

CFIA should change its import permit system to require all of the following common and scientific names: genus, species, subspecies, cultivar, and common name of the parent plant.

Since potential economic and environmental consequences are rated "High" for this species, it has the potential to cause major damage to the environment (i.e., changes to ecosystem processes, community structure and function, loss of biodiversity), it is difficult and costly to control, and it can negatively impact a variety of water-based industries, the OIPC supports Option 1.

With climate change, the potential for *Arundo donax* to overwinter north of Niagara Falls increases. Sites on the Great Lakes with sources of warm water (nuclear generating stations/cooling towers among them) are potential early sites for invasive reed establishment with outward spread from there.

The federal Alien Invasive Species policy document makes that point explicitly. *Arundo donax's* status in the World's Top 100 plant invaders must be a clarion call to CFIA and Canada about this plant and its potential risk. The Invasive Alien Species Strategy (2004) is a good policy document that sets the framework/policy rationale for the prohibition of this species.

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The OIPC once again would like to mention how pleased we are that the CFIA has asked for comment on the *Arundo donax* Risk Assessment and that this species is being considered for restriction (prohibition) in Canada. Our organization will be happy to provide the CFIA with support and strong leadership moving forward. We look forward to our continued collaboration with you.

Sincerely,



Iola Price, President
Ontario Invasive Plant Council