



**BRITISH  
COLUMBIA**

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April 25, 2007

File: 15440-01  
104376

Dr. Bruce Fraser  
Chair  
Forest Practices Board  
P.O. Box 9905 Stn Prov Govt  
Victoria, British Columbia  
V8W 9E1

Dear Dr. Bruce Fraser:

On behalf of the Ministry of Forests and Range (MOFR) and Ministry of Agriculture and Lands (MAL), please accept this letter as government's response to the recommendations in the Forest Practices Board's special report *Control of Invasive Plants on Crown Land in British Columbia* (October 2006).

**Recommendation 1**

*The Inter-Ministry Invasive Plant Committee should review and consolidate the invasive plant and weed lists into a single list for the province.*



**Response by MOFR and MAL**

The Inter-Ministry Invasive Plant Working Group, formerly the Inter-Ministry Invasive Plant Committee, has recognized that noxious weeds listed in regulation under the *Weed Control Act of British Columbia* (WCA), and invasive plants listed in regulation under the *Forest and Range Practices Act* (FRPA) do not entirely overlap, and that this may cause confusion for some forest and range agreement holders. There are 49 species listed as noxious weeds in the WCA, and these were selected based on the threat they pose to agricultural resources, including Crown land grazing. Forty-two invasive plant species are found in FRPA regulation, with the threat each species poses to the natural environment used as criteria for listing these species. Thirty species are found in common in both Acts.

The Ministries support the development of a common list of invasive plants for management. The Inter-Ministry Invasive Plant Working Group will consider and make recommendations regarding development of a science-based framework for listing invasive plants. The final result will lead to the rationalization of invasive plants lists, and possibly their consolidation.

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## **Recommendation 2**

*MOFR should identify which invasive plants will be managed as priorities at the district level, so that treatments can be applied in a coordinated fashion. In addition, MOFR inventories should include all species listed in the FRPA Invasive Plant Regulation so that licensees are aware of their presence when they are preparing operational plans.*

### **Response by MOFR**

FRPA Invasive Plant Regulation does not provide any direction on priorities among listed species. The MOFR has been operating its invasive plant management program using a containment strategy and an invasiveness/site priority process to determine which invasive plant sites to treat. The risk to habitats posed by each invasive plant species has been identified as an additional factor for consideration, as the invasiveness of one species will vary between geographic areas depending on climate, geology, ecosystems present, planned disturbance, etc. To this end, the MOFR is developing options for a risk and ranking process to assist in confirming invasive plant priorities at the provincial, regional, and local area levels. The options paper will be completed in April and presented to the Inter-Ministry Invasive Plant Working Group for consideration. Having a science-based invasive plant risk and ranking process in British Columbia will help streamline efforts and improve effectiveness of management programs.

The MOFR Invasive Plant Program does not have the resources to treat every invasive plant infestation, nor is it reasonable to expect operational plan holders to address all 42 listed species across their tenure areas. The ministry, along with other land management agencies and stakeholders, collaborates with local area invasive plant committees to develop and refine invasive plant priorities based on the respective species' threats to local ecosystems and economies. The development of a science-based risk and ranking process for use throughout the province will provide a consistent framework for the establishment of these priorities. It is a reasonable approach for forest and range operational plan holders to participate in these committees and apply the invasive plant prioritizations to identify the highest threats within their operating area.

The Board has recognized that the MOFR has taken the lead in conducting invasive plant inventories, an area that was limited or lacking prior to 2004. Inventories have been completed over a substantial portion of the highly threatened habitats within the province, but not all FRPA listed species have been inventoried everywhere. Additionally, inventory of non-native plant species that are invading new habitats can be quickly out-dated, requiring a shorter re-inventory period in some areas. The MOFR will review current inventory procedures and reporting mechanisms provided by the Invasive Alien Plant Program Application, and explore opportunities to identify which invasive plant species are inventoried within a defined geographic area. Prioritizing invasive plant species in collaboration with local or regional invasive plant committees and the MOFR, and identifying which species have been inventoried within a licensee's area of interest should assist in resolving potential confusion.

**Recommendation 3**

*The linkage among FRPA, the WCA, and the Integrated Pest Management Act needs to be clarified so that government agency, licensee, and private landowner responsibilities are clearly understood by all parties. Government should develop policy or legislation that integrates invasive plant responsibility among acts to provide this clarity.*

**Response by MOFR and MAL**

The Inter-Ministry Invasive Plant Working Group has identified the following objective in the Provincial Government's draft Invasive Plant Strategy:

*"Review and optimize application of provincial invasive plant legislation, policy and standards to address existing gaps, conflicts and overlaps."*

While the Working Group has not begun work on this specific initiative, members have provided input to a discussion paper on invasive plant control in British Columbia. This paper was prepared by MAL staff at the request of the Deputy Minister of Agriculture and Lands. The purpose of the work was to review current invasive plant delivery mechanisms in the province, identify areas and options for improvement, and propose solutions. This paper also provided the foundation for development of the Provincial Government's draft Invasive Plant Strategy.

The discussion paper is still in draft form; however it has identified the need to integrate invasive plant legislation and suggests the development of over-arching policy to combine various legislative tools. The paper and Invasive Plant Strategy are to be presented to the Deputy Minister's Committee on Natural Resources and the Economy for discussion and confirmation of invasive plant management options, including legislation and policy changes, for government to implement.

**Recommendation 4**

*MOFR should develop training courses for licensees to increase skills in plant identification, control measures and the use of the Invasive Alien Plant Database.*

**Response by MOFR**

The MOFR, in partnership with the Invasive Plant Council of BC, recently developed and presented fifteen Invasive Alien Plant Program Application (database) training sessions across the province. These sessions were open to all invasive plant management stakeholders, including forest and range operational plan holders. Feedback from participants and requests from others have identified the need for training in invasive plant identification and field inventory techniques. The MOFR plans to continue offering courses on the Invasive Alien Plant Program Application this year, and will expand it to include components on invasive plant identification and inventory methods. Consideration will be given to expanding the courses to include information on control measures.

Dr. Bruce Fraser

**Recommendation 5**

*MOFR should give consideration to amending section 26 of FRPA to include invasive plants. This would enable government to require strategies to address invasive plants in appropriate areas on both Crown and private land.*

**Response by MOFR**

Government recognizes the Board's suggestion that we need to improve legislative elements as they pertain to invasive plants. The current elements in FRPA that relate to invasive plants may require examination to identify changes that facilitate a better approach to achieve invasive plant prevention objectives. The structure of measures may not be an adequate fit for invasive plants, however a review of what is deficient is needed. Setting an objective that requires strategies and results is another option for consideration. The suggestion of amending section 26 of FRPA would undoubtedly improve the measurement of invasive plant results; however any changes will require thorough discussion and decision on the degree to which FRPA operational plan holders should be held accountable for invasive plant treatment. Overlapping tenures, uncontrollable vectors of invasive plant spread (e.g. wildlife, recreationalists), lack of consistently updated inventory data, and enforceability of results are key areas that must be considered in any deliberation. Implementing section 26 on private lands could lead to further confusion with the WCA, and may best be approached through rationalization of invasive species listed in legislation and enforcement. The MOFR will take this suggestion under advisement to explore additional opportunities.

I trust this letter addresses the Board's recommendations provided in the special report. If the Board has further questions regarding government's response to Recommendations 2, 4, and 5, please contact Val Miller, Invasive Plant Officer, Range Branch, MOFR, at 250-825-1166. For any questions regarding government's response to Recommendations 1 and 3, please contact Leslie MacDonald, Manager, Plant Health Unit, MAL, at 604-556-3064.

Yours truly,



Doug Konkin  
Deputy Minister  
Ministry of Forests and Range

*Per* Larry Pedersen  
Deputy Minister  
Ministry of Agriculture and Lands

pc: The Honourable Rich Coleman, Minister of Forests and Range  
Leslie MacDonald, Manager, Plant Health Unit, Ministry of Agriculture and Lands  
Val Miller, Invasive Plant Officer, Range Branch, Ministry of Forests and Range



File: 97350-20/2006-03

September 27, 2007

Doug Konkin  
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Victoria, BC V8W 3K2

Larry Pedersen  
Deputy Minister  
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Victoria, BC V8W 2Z7

Dear Doug Konkin and Larry Pedersen:

**Re: Invasive Plants on Crown Lands – Forest Practices Board Recommendations**

Please accept this letter as our reply to government's response, on April 25, 2007, to the recommendations made in our Forest Practices Board Special Report: Control of Invasive Plants on Crown lands in BC.

We are pleased that the MoFR and MAL are currently acting to implement all of the recommendations that we made on invasive plant lists, listing species for control, integrating legislation concerning invasive plants, conducting training, and possibly amending section 26 of FRPA to include invasive plants. We accept your response to our recommendations.

We now consider this file to be closed.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Bruce Fraser", written in a cursive style.

Bruce Fraser, PhD  
Chair