



Hello Gary,

As we briefly discussed at the Agro-forestry workshop in April, I am writing on behalf of the PEI Invasive Species Council (PEIISC) to submit some comments on the Forestry Report and encourage the forestry commission to consider including invasive species as a key issue in the new Forest Policy for Prince Edward Island.

As you know, invasive species pose a significant risk to the forests of PEI. The PEIISC has been working to address the movement of untreated wood as a pathway of introduction for invasive species. In particular, we are focused on the spread of forest pests and pathogens such as emerald ash borer (EAB) and hemlock woolly adelgid (HWA), which have killed millions of trees on the mainland but are yet to be detected on PEI. Should they become established on PEI, these insects would cause serious damage to our forests, their inhabitants, and the industries that rely on them.

As an island, PEI is well insulated from the natural spread of these threats thanks to the Northumberland Strait. Dispersal by wind and wildlife movement are indeed pathways of spread for invasive species, but these pathways are largely out of our control. However, the transportation of untreated wood products is a distinct and significant pathway that could be limited through regulatory control. Movement of wood products (logs, nursery stock, and firewood) is considered a high-risk pathway for the spread of EAB and HWA. Current restrictions prohibit the movement of these untreated wood products out of an infested area into an uninfested area, but the unlawful movement of untreated wood likely still occurs due to a lack of awareness and non-compliance ([Haack et al. 2010](#); [Jacobi et al. 2011](#)). Human-assisted EAB movement in the U.S. has been estimated to transport the pest between 25 and 100 km per year, and most of this spread has been associated with the movement of firewood ([Muirhead et al. 2006](#)).

The PEIISC feels that the following strategies should be considered as immediate steps to be taken in an effort to protect our forests and the organisms that rely on them:

- **Awareness:** Efforts should be made on the provincial scale to raise awareness of the risks of moving untreated wood products. Currently, the PEIISC relies on social media and community engagement to raise awareness of this issue. This is not enough. We ask that the province support the posting of signage at entry points to PEI targeted toward travellers that indicates that firewood should not be moved onto PEI.
- **Record keeping and compliance:** Through discussions with the province, we have found that there are minimal to no records kept of commercial wood loads being brought to PEI. This not only makes it difficult to make data-informed plans but presents issues with tracking the source of infected wood products when they are discovered. We also found that wood imports are not regularly checked and weight station staff are not formally trained on CFIA regulations as related to the movement of wood. We advise that all commercial loads of untreated wood products being

brought to PEI are checked for compliance with CFIA regulations and logged appropriately.

- **Legislation:** Ultimately, the risks could be best mitigated by legislating a ban on untreated wood products from being brought to PEI as a whole. However, it is unknown what the economic implications of such a ban would be. It would be well-advised to have this strategy investigated on a provincial scale to determine the feasibility.

In the recently published discussion paper “Towards a New Forest Policy for Prince Edward Island” invasive species are not identified as a key issue. We feel the threats of invasive species are significant and should be considered as a key issue for this list. We would love the opportunity to speak with you further about this issue and collaborate on steps toward a solution.

Thank you for your consideration!

Sincerely,



Beth Hoar
Co-chair, PEI Invasive Species Council



Chase Guindon
Coordinator, PEI Invasive Species Council