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**Mr. David Cooper**

Acting Executive Secretary  
Secretariat of the Convention on Biological Diversity  
United Nations Environment Programme  
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March 30, 2023

Dear Mr David Cooper,

In response to CBD Notification 2023-017 "Invitation to participate in the peer review of the annexes to decision 15/27 and to submit information on invasive alien species," Canada is pleased to provide the Executive Secretary with peer-review comments as per paragraph 2, and information on invasive alien species as per paragraph 9. Please see below for this information.

Best regards,

Kelly Torck  
CBD National Focal Point

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## TEMPLATE FOR COMMENTS ON ANNEXES I TO VI OF DECISION COP-15/27 ON INVASIVE ALIEN SPECIES

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<b>Title of document reviewed:</b>	<b>COP-15/27 Invasive Alien Species (Annexes I to VI)</b>

Comments on Annexes 1 to IV from Decision COP-15/27 Invasive Alien Species		
Page	Paragraph (or line) #	Comment
	General	<p>Canada would like to thank the CBD Secretariat for its work on these annexes. Canada is pleased to see the language reflects the need for a whole of society approach. IAS, like other challenges facing nature, requires governments, civil society, and Indigenous nations to work together. Also, the focus on prioritising IAS and using science-based decision-making is a strength that runs through all the annexes.</p> <p>Canada is also grateful that a number of general comments provided during SBSTTA-24 have been included in the document, and that the peer review process allows for a more granular review of the Annexes. This process will hopefully help move towards the adoption of this Voluntary guidance at COP16.</p>
<b>Annex I</b>		
1	Para 1	Reference to Aichi Biodiversity Target 9 should be replaced with KMGBF Target 6.
1	Para 1	At the outset the definition of invasive species should be included (e.g., link to CBD definition) and differentiated from geographic range changes to species that are not directly driven by human



		<p>agency. In the latter case it needs to be clarified if geographic range changes of species that are driven indirectly by human agency (e.g. anthropogenic changes to climate, land use) are in or out of scope.</p> <p>Specifying the impact of invasive alien species is also needed. Is the document looking at IAS that impact biodiversity, or all of them (affecting human health, for example), recognizing that impacts of invasive species on biodiversity may be difficult to measure?</p>
1	Para 1	<p>While the annex focuses on management of IAS, the management of pathways to prevent IAS introduction and establishment should also be mentioned as it is part of GBF Target 6. Recognizing the importance of managing pathways would be featured as a preamble.</p>
1	9	<p>Using the word “management” rather than “control” may be preferable. “Management” is now often listed along the terms control and eradication (eradication, control and management). Management being often the only way possible to mitigate the impact of invasive species for which eradication / control is unfeasible.</p> <p>Control is an option within all management strategies available.</p>
1	15	<p>The last sentence seems to imply that consideration of biodiversity, animal welfare and public acceptability may be too problematic to include in cost-benefit analyses. This type of expertise exists through organizations like Economists At Large.</p> <p>Suggest revising to “<i>Including consideration of biodiversity, animal welfare and public acceptability in cost-benefit analyses is important, although are often difficult to represent in simple financial terms</i>”</p>
1	17	<p>There is an opportunity at the end of the first sentence to make a reference to the prevention of introductions. For example, the following text could be added: “<i>thus necessitating increased investments in prevention</i>”.</p>
1	Section A	<p>Multi-criteria decision analysis (MCDA) is placed up front and central to Annex I. It would be a very useful tool for ranking/prioritizing invasive species for action/intervention effort. However, it is more an end product of the risk assessment process, which would likely include quantitative model-based risk assessments or qualitative approaches. These key methods are not mentioned at all and should be. Also the criteria for MCDA need to be included – are they simply impacts on biodiversity or the secondary impacts of biodiversity change on human health and well-being?</p>
1	Para 2	<p>“<i>established cost-benefit and cost-effectiveness methods are widely available and already in use in some regions (...)</i>”</p> <p>Recommendation to be more specific than “regions” and provide names / links to those methods.</p>



1	Para 4	<p>To maybe add after Para 4 (i.e., a new paragraph):</p> <p>A key element that may be worth adding to an additional paragraph would be the importance of acting in a timely manner whenever an invader is detected. Sadly, too often, a species can no longer be eradicated locally as delays in initiating actions allow sufficient time for the species to encroach on the new habitat invaded (establish, achieve larger biomass/population size, adapt, etc.). Also, the longer the time taken to initiate action, the more severe the impacts are on the ecosystems and biodiversity. Early Detection and Rapid Response is not really included in this annex, yet it is one of the most efficient way to help ensure eradication of a detected/introduced IAS, and limit its spread.</p>
1	Para 5	<p>Provide a definition and an example of a multi-criteria method.</p> <p>Editorial suggestion: “<i>Multi-criteria methods provide a route to the rapid assessment of options and are already widely used to support decision making for invasive alien species management</i>”</p>
1	30	<p>It should be noted that the evaluation of management options still requires some science information to assess benefits, which can be a barrier to cost-benefit analysis. How would multi-criteria methods address this particular gap?</p> <p>Some departments in the Government of Canada have developed Screening-Level Socio-Economic Risk Assessment Guidelines. However, those guidelines look at potential economic activities that could be impacted by an invasions and in some instance maybe be able to say to what extent if biological information is available, but they do not help assess options.</p> <p>Typo. Please delete the question mark at the end of the sentence.</p>
1	Para 6	<p>Strongly agree with the inclusion, here and throughout the document, of “<i>free, prior, and informed consent</i>” is very important. (e.g., Para 15 of p.4; Para 6 p.10).</p> <p>However, the sentence spans 5 lines and may benefit to being reworded. Inclusion of community science could also be useful to recognize their role, especially when data is lacking.</p>
1	Para 7	<p>It appears that a two-stage approach is suggested: first to use a multi-criteria approach to narrow down the number of options and then use more rigorous methods to identify the best approach. This seemingly contradicts the spirit of the Section A that states that multi-criteria approach is needed in order to make rapid, agile</p>



		<p>decisions. Perhaps more clarification on the combination of the two approaches could be useful.</p> <p>On another point, traditional indigenous ecological knowledge tends to be institutional memory and therefore not published; however, it must still be strongly considered and complementary to Western science in multi-criteria approaches.</p>
1	41	Typo. Please delete “ <i>benefit</i> ” after “ <i>cost-benefit analysis</i> ”.
1	Section B	<p>Although implicit in the present context, the instauration of an efficient collaborative platform for decision makers is one of the most crucial elements to develop and implement worldwide.</p> <p>The lack of any previous management experience or knowledge of the biology of a new species invading an area previously not impacted is often resulting in a delay between the first observation and the official response by the government entities responsible for managing the species concerned. Such delay is the primary cause leading to a worsening situation, reducing the probability of eradicating a new invader. Such delay could be reduced if efficient coordination were implemented. As of 2023, such coordination doesn’t exist worldwide. Scientists collaborate through their research and publications; however, such an approach does not allow government to act or react rapidly whenever a new invasive species is detected.</p>
1	Para 8	<p>This sentence could be clearer. Assuming that the meaning of the sentence is that “response strategies” would be part of broader IAS management strategies and plans, the following edits are suggested:</p> <p><i>“Coordinated national, subnational and local response strategies should be developed to minimize incursions and impacts of invasive alien species, such as national, subnational and local invasive species strategies and action plans as a part of <b>broader</b> national, subnational and local biodiversity <b>IAS management strategies and action plans.</b>”</i></p> <p>If this was not the meaning of the sentence, it could be shortened and end after “<i>impacts of invasive alien species</i>”.</p> <p>Furthermore, consideration could be given to the fact that response strategies may need to be updated to be practical and effective.</p>
1	46	Typo. Please replace “A <i>coordinated national, subnational and local response strategies</i> ” by “ <i>Coordinated national, subnational and local response strategies</i> ”.



2	Para 9	<p>The words “States” or “Parties” seem to be used interchangeably in the document (Annexes I-IV mostly uses States, and Annexes V-VI uses Parties). Is the intent to use those terms interchangeably? It may be worth make the language more uniform. The inclusion of “Other Governments<sup>2</sup> is not always consistent either.</p> <p>Adding “identification” could also be useful as not all States have identified pathways of introduction and dispersal of IAS. “... <i>applied to prioritize <b>identification and</b> management of dispersal pathways ...</i>”</p>
2	61	<p>Suggest adding: “<i>Knowledge <b>building and</b> exchange should be promoted ...</i>”</p>
2	Para 11	<p>There is a verb missing from the first sentence of the paragraph. Suggested edits:</p> <p><i>“The best available methods for prioritizing the invasive alien species to be managed and for assessing feasibility and cost-effectiveness, <b>should be transferred</b> in a form compatible and complementary to existing approaches to risk assessment.”</i></p>
2	67	<p>Suggest changing the order of “States, sectoral authorities and organizations and subnational governments” to “States, subnational governments, sectoral authorities and organizations”.</p>
2	Paragraph 14. (a)	<p>Suggested edits:</p> <p><i>“<b>Review and harmonization of multi-criteria methods</b> - There is considerable variation in the methods and approaches to prioritization and decision making used in different countries...”</i></p> <p>Furthermore, the words “strengths and weaknesses” may need to be reconsidered. A method may be applicable in some circumstances and not others, without making it strong or weak.</p>
2	Para 14 (b)	<p>Typo. “<i>best practice</i>” should be plural</p>
2	Para 14 (c)	<p>This sentence is vague/general. Adding examples would help give an idea of scope.</p>
2	Para 14 (e)	<p>Adding information about other possibilities when data is not possible could be useful. For example, linking lack of data to the need to prioritize research in that area.</p> <p>Furthermore, a reference to open data here could be useful as well (e.g., <i>Where possible, quantitative data should be encouraged to be published and open-access, and used to underpin decision-making, in order to better identify and access key information</i>)</p>



2	Paragraph 15	<b>Strongly agree.</b> The development of international guidelines, as done through the OECD for the testing of chemicals would be a significant achievement which would support AIS management internationally. <a href="https://www.oecd.org/chemicalsafety/testing/">https://www.oecd.org/chemicalsafety/testing/</a>
3	Paragraph 16	<p>Strongly supportive of the recommendation to adopt common data formats, which will significantly support data sharing.</p> <p>Also another opportunity to add reference to prevention here “<b>prevention</b> and management activities” and after “evidence-based”.</p> <p>The last sentence could mention that “<i>prioritized lists of action</i>” may be specific to an area or a specie.</p>
3	105-107	<p>Risks also includes health and welfare of animals (e.g., introduction of novel diseases like the Chytrid fungus, or possible diseases that could impact domestic animals). The impact of the health and welfare of animals in turn will have impact on biodiversity, local communities, etc. It is important to indicate and mention all impacts and risk pathways. There is a significant risk that they will be overlooked if lumped in with generalized terms.</p> <p>This also refers to the general comment at the top in Para 1 about being clear of the scope of IAS in the document.</p>
<b>Annex II</b>		
3	Paragraph 1.	One could argue that eCommerce is not necessarily a pathway. It increases the volume and movement of potential AIS / IAS that may then be released through actual pathway (e.g., intentional / unintentional releases), etc.
3	119	Target 6 mentions potential IAS. As such, a reference to “ <b>potential and established</b> IAS” could be useful here to reference back to the target.
3	Paragraph 3	<p>Strongly Agree. The management of organisms in trade in Canada falls under multiple departments / agencies and acts / regulations. Proper scoping of authorities, policies and gaps is needed to assess how to improve biosecurity nationally.</p> <p>However, the import of live plants and animals and how it is regulated is partly driven by international agreements which are very difficult to influence at the national level. For example, requests to add zebra mussels to the list of contaminant that plant imports should be devoid of have been unsuccessful. Similarly,</p>





		imposing import prohibitions for certain species may be contested through free trade agreements.
3	Para 5	<p>Suggest removing this paragraph. States can already control what species can be imported and create such lists. These lists could be difficult to establish since any specie could become an IAS under the right conditions. Furthermore, this paragraph may constitute a trade risk. Indeed, these types of list could be over-precautionary and lead to diminish sustainable use of wildlife trade.</p> <p>In addition, although theoretically a valid option, the reliance on a “White List” (a.k.a. species allowed) is practically almost impossible to implement and enforce. Considering fish alone, over 1,500 species are commonly found in the trade (while over 5,000 rarer species are reported in the trade) and over a million aquarium fish are sold worldwide. In addition, considering the nomenclature, dozens of species change names annually, and new sibling species are recognized, often distinguishable by only a few highly specialized ichthyologists. On top of that, misidentification /mislabelling is plaguing the industry. In this context, it is only possible for border agents and enforcement officers to recognize and target undesirable species while managing a list containing a limited number of species (a.k.a a “Black List”). The financial and human effort required by implementing a strategy involving a white list may not justify the benefit of using such a workforce toward more rewarding actions aimed at managing invasive species.</p> <p>If lists are to be developed, they should be developed to include species whose import should be restricted or prohibited based on a specified set of characteristics that would make them high risk of IAS within that specific country. Guidance/criteria on what characteristics make a species high risk in a specified environment should be developed. Lists may also be better for specific states at very high-risk of invasive alien species, such as small island states.</p>
3	144	Here and throughout the document, suggest using “Help ensure” rather than “Ensure”. “Ensure may have legal implications.
3	Para 8.	<p>Invasive species do not always fall under phytosanitary requirements as invasive species might not be within the scope of the legislation/regulations so this might not be applicable for all countries.</p> <p>The potential for AIS to be hitchhikers, for example in aquatic plants, is not reflected in import requirements negotiated through</p>





		international agreements, and these import requirements should be revised and updated.
4	Para 9	Not fully clear is this is the best sector to target as courier and postal services are not responsible for regulating the important of goods and they are not responsible for regulating the prospering labeling of goods coming into a country so they might have no way of knowing if an item is prohibited if it is incorrectly labeled. Education is good but it is unclear what specific actions they could take.
4	Para 10	Reference here to pet/aquarium trade industry should be made clearer. It would also be in accordance with Decision XII/16 mentioned in Para 9.
4	Para 11	<p>Inclusion of behavioral change is positive. This paragraph could also acknowledge the value of government education campaigns to support those behavioral shifts.</p> <p>Suggestion Line 154 “...<i>publicity campaigns should be <del>used</del> leveraged to disseminate...</i>”</p>
4	Para 12	<p>Agree. Additional outreach by regulators is required.</p> <p>e-Commerce platforms: these companies have full authority / decision to allow the sale of items on their platforms in accordance with the “internal policies”. While there are several instances where internal policies of companies will specifically refer to species at risk for example, in most cases companies do not have policies dedicated to AIS / IAS listing applicable acts and regulations or species that are prohibited. Engagement is needed with these companies to make them aware of relevant regulations, which will help agencies take down products that may be problematic. Based on the generally low monetary value associated with organisms, e-Commerce platforms may decide to abandon the sale of organisms if regulatory requirements are too onerous, as seen with moss balls where a number of companies rapidly blocked the sale of those products once engaged by Canada and the United States</p> <p>Courier companies - The trade of OIT through courier is actually restricted or prohibited, according to the internal policies of most companies. Increased engagement and education and outreach should be taking place with these companies to make sure that they are aware of AIS concerns and risk and that they are not unwittingly allowing their distribution.</p>
4	Para 14.	Agree. Based on the detection of zebra mussels in moss balls, an argument could be made that all aquatic plant species originating



		from eastern Europe are at a high risk of containing zebra mussels. Greater understanding of the trade of commodities and their origin would help assess risks related to shipments.
5	Para 15-17	These action items are important. However, the challenge of proper labelling may need to be addressed first. Without proper labelling, it is more difficult to flag what needs to be inspected.
4	Para 17.	Agree. In addition, an international “warning” system should be put in place to inform enforcement agencies of particular aquatic invasive species risks associated with certain commodities.
5	Para 18. (a) / (b)	Agree. See paragraph 12.
5	Para 19 (c)	Opportunity to reference back to T6 language: “ <i>Continue to monitor e-commerce with potential invasive alien species at the global and regional levels with a view to identifying trends and risks in trade of invasive alien species or of species with the ability to become invasive.</i> ”
5	Para 19 (f)	Please add “ <i>at all levels</i> ” after “ <i>Parties and Other governments</i> ”.
5	Para 20. (a)	Raising awareness is very important; however, import/export requirements must be updated to take into account aquatic invasive species. Requirements are centered on terrestrial pests or diseases, but not AIS.
5	Para 20 (b)	<p>An IAS risk-based labelling system to help address this threat is overdue, and there are strong precedent in the Globally Harmonized System of Classification and Labelling of Chemicals for chemicals which was led internationally <a href="https://www.canada.ca/en/news/archive/2014/03/globally-harmonized-system-classification-labelling-chemicals-ghs-.html">https://www.canada.ca/en/news/archive/2014/03/globally-harmonized-system-classification-labelling-chemicals-ghs-.html</a></p> <p>It should be noted that frameworks such as the Environmental Impact Classification for Alien Taxa may be problematic for many aquatic invasive species, especially marine ones, as this approach may result in classifying too many marine species as data deficient. Reference to the EICAT does not need to be removed on the understanding that another framework could be used by relevant international expert organizations.</p> <p>Additionally, adding a sentence reaffirming States’ authority in determining the harm and/or impact of IAS could be useful.</p>
<b>Annex III</b>		
		It is not clear in Annex III if climate change is simply seen as an enabling factor for species invasions, or a driver. The IPBES



		<p>Thematic Assessment of IAS and their controls may help be more specific about climate change as an enabling factor or a driver.</p> <p>Canada is providing funding to the Canadian Council on Invasive Species for the development of a National Invasive Species and Climate Change (NISCC) Network linking climate change and invasive species science, research, and knowledge across all government and non-governmental sectors, including First Nations, Métis, and Inuit peoples.</p>
6	Para 2	The first sentence could be simplified. Suggestion: “ <i>Climate change is aiding increased rates and risks of the spread of many alien species</i> ”.
6	Para 4	<p>The consequences of ocean acidification resulting from climate change could also be mentioned.</p> <p><a href="http://dx.doi.org/10.2147/RRBS.S70357">http://dx.doi.org/10.2147/RRBS.S70357</a> <a href="https://royalsocietypublishing.org/doi/pdf/10.1098/rspb.2013.2681">https://royalsocietypublishing.org/doi/pdf/10.1098/rspb.2013.2681</a> <a href="https://link.springer.com/article/10.1007/s10530-020-02445-9">https://link.springer.com/article/10.1007/s10530-020-02445-9</a></p>
6	Para 5	Suggest changing the sentence to make it clearer (use of cannot seems incorrect): <i>Extreme weather events can transport invasive alien species to new areas, and can also cause disturbances in habitats that enable invasive alien species to establish themselves and spread.</i>
6	Para 6	Remove “under climate change” as it is repetitive.
6	Para 7	Suggest adding the footnote with the reference to the online report within the body of the main paragraph. Making reference to the online forum that led to these Annexes is important, and it would make the paragraph and sentence more relevant.
6	Para 9. (a)	<p>Agree. Horizon scanning can also inform Regulations and prohibitions.</p> <p>There also is an opportunity in this paragraph to include community science to support early detection and rapid response.</p>
6	Para 9. (d)	Greater conservatism in climate matching/modelling may be needed in some cases (e.g., Risk assessment process for Introduction & Transfer of species for aquaculture)
7	Para 10. (a)	Agree. Horizon scanning takes into account climate change and future temperatures.
7	Para 10 (h)	Agree with inclusion of Indigenous peoples. Suggest rephrasing the sentence to include Traditional Knowledge.
8	Para 10 (i)	Zoonotic disease experts and animal welfare specialists could be included there as they may otherwise be overlooked.
8	Para 11 (c)	Opportunity in this paragraph to include the “mitigation” part of T6 and make reference to restoring ecosystem and ecosystem resilience affected by IAS.



7 – 8	Sections B, C, D	Generally agree with all points raised. Standardized climate predictions methods and predictions should be shared between national agencies to ensure that prioritization of sites, species, pathways is based on a common understanding of expected temperature increases as a results of climate change.
8	Para 11 (f)	Agree with inclusion of Indigenous peoples. Suggest rephrasing the sentence to include Traditional Knowledge.
8	Para 12	Opportunity to include language around “working across borders”. This supports this section (national and international cooperation), and is highly application to the issue of IAS.
<b>Annex IV</b>		
		No comments
<b>Annex V</b>		
9	Para 1	Please add “ <i>at all levels</i> ” after “ <i>Parties and Other governments</i> ”.
9	Para 2	Pease add “ <i>subnational</i> ” after “ <i>regional</i> ”. To note, Canada would like to thank the CBD Secretariat for adding the notion of subnational n most of the Annexes already.
9	Para 3	<p>Strongly agree. Clear indicators and reporting methods and international data standards should be endorsed by parties to facilitate data sharing between parties.</p> <p>Potential to make reference to potential IAS in this paragraph as well.</p> <p>Also agree with inclusion of “facilitating dialogue” and “reconcil[ing] views”. For example, Indigenous peoples may have a different view of what an IAS is, especially if these IAS have been used for medecines or as cultural species.</p>
9	Para 5	Strongly agree
9	Para 9	Would be supportive of IUCN-ISSG, GBIF and CABI providing support and guidance for sharing / using data internationally, particularly if it support nations reporting to proposed headline / supporting indicators. However, because of added workload, there should be clear benefits for the parties to be investing in this work.
10	443	The need for free, prior, and informed consent of Indigenous people when using data coming from them is key as well. Not all Indigenous communities will be willing to take part in research, but enabling connection is a useful endeavor as some will likely want to support, participate, and undertake application research on the lands and waters they steward.



10	447-41	While this paragraph suggests contributing to existing databases, it does not provide information about important considerations such as accountability for the cost to maintain the databases, verification of submissions by appropriate scientific authority, and ensuring data compatibility.
10	448	Spell out CABI (Centre for Agriculture and Bioscience International) to be consistent.
	General	<p>Canada is supportive of the push for coordinated data streams and international database or repository of this kind of information. There are still many challenges to address to have a clear national picture of IAS and their impacts. Contributing to global database, as suggested in this annex, may be difficult in the short-term. It should also be noted that, with regards to aquatic invasive species, some Canadian departments use the Ocean Biodiversity Information System (OBIS). Both OBIS and GBIF work to provide marine data.</p> <p>Strongly agree with open data platforms.</p> <p>Canada also supports establishing international standards. Work around establishing international data standards would lead to common terminology, and establishing minimum international data standards will be instrumental to interoperability of various systems and feeding to GBIF, and using the data from GBIF for our purposes.</p>
<b>Annex VI</b>		
10-14	Annex VI	<p>Given that Annex VI touches on additional advice, some of which are beyond the scope of the CBD, it could be useful to add a paragraph at the beginning explaining what is the role of the CBD with regards to the additional advice and the other international organizations mentioned.</p> <p>Furthermore, given that the scope of this advice is beyond that of the CBD, the language in the paragraph should maybe me more suggestive (e.g. would/could rather than should).</p> <p>Canada does have some has expertise in many of the topics listed in the annex including taxonomic identification and classical biological control. Canada contributes to this by having international students/post docs work with research scientists across regional labs.</p>



		It should also be noted that the list of pathways is not exhaustive, and mentioning that it is not may be helpful and pave the way for future additional guidance.
9	Para 2	Strongly agree. The current sanitary / phytosanitary regime is too focused on diseases / terrestrial pests and does not address aquatic invasive species imported as hitchhikers in aquatic plants or in other shipments. Engaging exporting nations on issues related to hitchhikers is further complicated by the fact that sellers that are inadvertently exporting AIS are often compliant with international requirements, thereby limiting regulators tools to address the issues.
9	Para 3	<p>Strongly agree. Urgent revision of the international standards is needed. Clarifications would be necessary on how to initiate this process and what information / data would be required to support updated requirements.</p> <p>It should be noted that regularly updated and curated data may be expensive. Facilitating long-term funding could be noted here.</p>
10	Para 1	Opportunity to make reference to potential alien organisms.
11	Para 6	Should be updated to Target 6 of the KMGBF rather than Aichi Target
11-13	Section C	It would probably be useful for Parties, subnational governments, and other stakeholders to use the pathway categorization from the CBD <a href="#">UNEP/CBD/SBSTTA/18/9/Add.1</a> to have a common understanding and naming of pathway categorization. This may help work more coherently on pathways.
11	Para 10	Agree. Adding a reference to looking at examples where inter-basin work is already happening would be useful. There is work done between Canada and the United States on the Great Lakes or with the Columbia River Basin.
11	Para 11	Strongly agree. The mitigation measure of programs to impede the introduction or spread of aquatic invasive alien species, such as Clean Drain Dry and Decontaminate, which is used in several Canadian provinces and US states should be propagated (or legislated) within North America and internationally to increase awareness of aquatic invasive species risks related to the transfer of watercraft and decrease introductions and spread.
12	Para 16 – 17	These are the only references to emergency response strategies and aid strategies. There could be more emphasis on the linkages between Rapid Response for high risk priority species and linkages to emergency management and approaches such as Incident Command System to support response and mutual aid agreements could be an important part of response planning and preparedness.



12	Para 21	<p>Agree. Tourism has a role to play to increase awareness about aquatic invasive species, understanding that the industry tends to engage in “green washing”.</p> <p>May be more encompassing to use the term “<i>tourism operators</i>” rather than “<i>travel operators</i>”, or both terms to help address the issue more comprehensively.</p>
13	542	<p>Adding reference to who should lead those evaluation may help implement this paragraph more efficiently.</p>
12	550	<p>Should an example be warranted here, wood pallets or dunnage could be included.</p>
13	Para 32	<p>Strongly Agree. Internationally recognized guidelines would be beneficial, as it exists for the testing of chemicals. This would further support regulators and partners in the management of AIS.</p> <p>Maybe wording could be adjusted to show that some work already exists in some countries. Suggest “<i>there is a need to develop or build on ...</i>”</p>
13	586	<p>A definition of “<i>classical biological control</i>” would be useful here. It is unclear whether this is looking at pesticides or mechanical removal. This lack of clarity raises questions with regards to the focus on biological control as there are many other control/management methods available to address IAS and sharing knowledge about these would be beneficial. Biocontrol is one tool in the toolbox and is not necessarily effective at early stages of IAS infestations.</p>