



GinsengOntario

1283 Blueline Rd., Box 587
Simcoe, Ontario, Canada N3Y 4N5
P: 519-426-7046 F: 519-426-9087
E: info@ginsengontario.com
www.ginsengontario.com

Ministry of the Environment, Conservation and Parks
2nd Floor, Macdonald Block
900 Bay Street
Toronto, ON M7A 1N3

Attention: The Honourable Rod Phillips

Dear Minister,

The Ontario Ginseng Growers Association welcomes the proposed changes to Ontario's *Endangered Species Act* (ESA). Environmentalists, agriculturalists, scientists, and Ontario residents alike realize that the 2007 ESA falls short of its stated goal of "protecting species that are at risk, with appropriate regard to social, economic and cultural considerations". The proposed amendments put forward on April 18, 2019, do a much better job of protecting species while at the same time enabling efficiency and growth, cutting unnecessary red tape, and embracing social and cultural considerations.

The Committee on the Status of Species at Risk in Ontario (COSSARO) is the body tasked with assessing whether a species is at risk. Currently, only scientists perform these assessments. Broadening COSSARO membership to include "community knowledge", while maintaining scientific input, will ensure that the assessments are comprehensive and accurate. For example, if the ginseng community's knowledge had been included at the time of drafting the 2007 ESA, the OGGA is confident that the province would not have banned the planting of wild, wild-simulated, and woods-grown ginseng – a prohibition that hinders, not helps, the species.

Additionally, granting COSSARO the ability to look beyond Ontario's borders to assess a species' status reflects the province's willingness to make decisions based on current science as opposed to arbitrary historical boundaries.

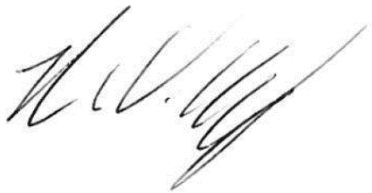
The OGGA endorses the proposed changes that give the Minister the power to make regulations limiting the application of the prohibitions with respect to a species as well as the separate Ministerial power to order a person not to engage in an activity (or to stop engaging in an activity) that may have a significant adverse effect on a species listed on the Species at Risk in Ontario List as an extirpated, endangered or threatened species.

Together these tools grant balanced Ministerial discretion that can account for current realities and allow for short-term variances when necessary.

Finally, the proposed changes in timing are positive as they will result in the avoidance of rash decisions and allow for more time to ensure both adequate planning and robust and collaborative consultation processes.

In conjunction with the above, the OGGA continues to respectfully recommend that American ginseng's "endangered" status be permanently downgraded or revoked entirely. Not only are ginseng levels well beyond any threshold level of "endangered" status, but doing so will also achieve many positive outcomes, including a safe, maintained, and expanded ginseng population, the reduction of red-tape, and increased economic opportunity.

The suggested revisions to the ESA work to accomplish the long-sought goal of protecting species at risk while appropriately considering social, economic and cultural considerations, and for that the OGGA applauds the Ontario Ministry of Environment, Conservation and Parks' proposed changes.

A handwritten signature in black ink, appearing to read 'R. VanDeSlyke', written in a cursive style.

Remi VanDeSlyke
Chair - OGGA