

April 14, 2020

Biodiversity Coordinator
Ministry of Natural Resources and Forestry
Biodiversity Section
300 Water Street
5th Floor, North Tower
Peterborough, Ontario
K9J 3C7

Dear Biodiversity Coordinator,

RE: Environmental Registry of Ontario Number 019-1162 Seeking information on invasive species and carriers under the *Invasive Species Act, 2015*

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

OFA has reviewed the list of 13 species for possible regulation. We have only commented on European frogbit, yellow floating-heart, fanwort and wild pigs as these could negatively impact Ontario's agriculture and food sector should they become established.

Turning first to the three aquatic plants, European frogbit, yellow floating-heart and fanwort, these three could become established in municipal drains constructed under Ontario's *Drainage Act*. Municipal drains often require maintenance and repairs to remove excess sediments, address bank slumps or blockages in the drain that impair its function. The *Drainage Act* obligates the municipality, through their Drainage Superintendent, to undertake any maintenance and/or repairs to restore the drain to its original design specifications. If one or more of these aquatic plant species were to become established in a municipal drain, the Drainage Superintendent would need to know of the plant's presence, how to deal with these plants when they are removed from the drain and how any equipment used in the course of maintenance and repairs must be cleaned to ensure their unintentional transfer to another watercourse.

Lastly, OFA recommends that wild pigs also be reviewed under the *Invasive Species Act, 2015*. The establishment of widespread populations of wild pigs could devastate Ontario's pork sector through African Swine Fever (ASF) carried by wild pigs and transferred to our domestic pig herds. Furthermore, all pigs, wild, pet or otherwise outside a fence, pose a disease risk to domestic pigs. In addition, we believe that the negative impacts on native wildlife, ecosystems and biodiversity warrants the development and implementation of policies and programs to curtail the growth and spread of wild pigs across Ontario. OFA supports adding wild pigs to the *Invasive Species Act*. We further recommend that the Ministry's Wildlife Research Technicians tasked with wild pig response be continued in that role for at least the upcoming fiscal year, 2020-2021.

Focussing on the five questions posed in the Environmental Registry posting notice:

1. Do you agree/disagree that we should review the identified species and carrier for regulation under the *Invasive Species Act, 2015*?

Recognizing that we are only commenting on European frogbit, yellow floating-heart, fanwort and wild pigs, OFA believes that from our agricultural perspective, these four species should be reviewed for regulation under the *Invasive Species Act, 2015*.

2. Do you have information, including personal experiences, that would help us as this review proceeds?

No, OFA does not have any direct experience with European frogbit, yellow floating-heart, fanwort or wild pigs.

3. Would the regulation of one or more of the proposed species or carrier have a positive or negative economic impact on you or your business?

We believe that regulation of European frogbit, yellow floating-heart, fanwort and wild pigs would have a positive economic and environmental impact on farm businesses across Ontario.

4. What rules would you recommend be applied to some or all the identified species or carrier – see sections 6, 7 or 8 of the *Invasive Species Act, 2015* for more information?

OFA proposes that at this time, European frogbit, yellow floating-heart, fanwort and wild pigs be subject to section 6 of the *Invasive Species Act, 2015*.

5. Should we consider exceptions to the prohibitions during the development of the regulatory proposal (e.g. allowing the import of the species provided individuals are dead)?

OFA believes there should be no exceptions to these prohibitions during the development of the regulations.

The OFA welcomes this opportunity to provide its agriculture-centred perspective on European frogbit, yellow floating-heart, fanwort and wild pigs. We trust that our information assists the Ministry of Natural Resources and Forestry in determining the best course of action to pursue related to these species.

Sincerely,



Keith Currie
President

cc: The Honourable John Yakabuski, Minister of Natural Resources and Forestry
The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors