



June 7, 2021

MNRF - Fish and Wildlife Policy Branch
300 Water Street
P.O. Box 7000
Peterborough, ON
K9J 8M5

Re: Regulating 13 invasive species and watercraft as a carrier of invasive species under Ontario's Invasive Species Act, 2015

Dear Minister John Yakabuski,

Meat & Poultry Ontario (MPO) is very pleased to provide comments on the Proposed Regulatory Provisions: Regulating 13 invasive species and watercraft as a carrier of invasive species under Ontario's Invasive Species Act, 2015. We are fully supportive of Ontario being prescribed as a control zone for pigs, however are concerned an outright ban may make it more difficult to track and identify where there may be problems and cause economic disadvantage for processors and retailers that sell this product as a point of difference.

Meat & Poultry Ontario is the heart of Ontario's meat industry. Our members are independent businesses proud to serve the communities they live and work in. They can be found across the province, involved in every stage of the meat industry from harvesting to retail.

Ontario's meat and poultry sector employs 24% of Ontario's food and beverage processing industry — the single largest manufacturing employer in Ontario — and generates \$10 billion of the province's \$49 billion food and beverage processing industry revenue.

As per Ontario's Strategy to address the threat of invasive wild pigs "wild pigs have been coined 'an ecological train wreck' because of the extent and magnitude of damage they cause. They have significant impacts on the natural environment, native wildlife, and the agriculture industry". Meat & Poultry Ontario is supportive of the inclusion of pigs as a

regulated invasive species, which would include prescribing prohibitions through regulation to prevent the establishment of wild pigs in the province.

We support Ontario being prescribed as a control zone for pigs, the prohibition of the release of any pig in the natural environment and/or the bringing a live pig into a provincial park or conservation reserve and that in the event a pig accidentally escapes containment; the Ministry would need to be notified immediately and the escaped pig recaptured or dispatched as soon as possible. We recognize that the majority of wild pigs in Ontario are pigs that have recently escaped or otherwise been released from containment and that a more rigorous approach to compliance and enforcement is necessary to prevent intentional and/or accidental release.

To our knowledge, the import, possession, transport, propagation, buying, selling, leasing or trading of live Eurasian wild boar and their hybrids has not been banned in any other province or territory in Canada, therefore creating an economic disadvantage for Ontario farmers, processors and retailers who sell products made with wild boar. Processors will be forced to purchase these products from other provinces or from other countries, increasing the cost to manufacture these products as well as the cost to the consumer.

Without a national strategy to address this issue, the banning of Eurasian wild boar in only Ontario will not mitigate the risk of the species proliferating in the wild, potentially crossing into Ontario from other provinces. The potential for international trade disruption due to ASF or other animal health diseases found in wild boar will be felt a national level, regardless of any one provincial strategy.

It is important to acknowledge that recapturing or dispatching escaped pigs is already common practice with many of Ontario's pig producers. Additionally, many resources have been developed and distributed by the pork industry to help prevent escapes. For example, Swine Health Ontario developed a guide for responsible pet pig ownership, Ontario Pork has published a resource for small scale pig farmers in Ontario, and the Ontario Ministry of Agriculture, Food and Rural Affairs has a complementary guide specifically addressing fencing for outdoor production.

With rigorous education, compliance and enforcement of Section 23 - Declaration of an invaded place and Section 27 – Actions to control or eradicate invasive species of the



Invasive Species Act, 2015, we believe that the risk of pigs, specifically Eurasian wild boar of escaping and proliferating in Ontario will be significantly decreased.

Eliminating the farming of wild boars will not mean that you are eliminating the threat of wild boars proliferating in the wild. Situations where large number of wild boar have been released in the wild has been a direct result of neglect and intentional release. Banning the responsible farming of animals will only cause neglectful individuals to carry out their practices underground, without supervision or recourse and much harder to police. **Maintaining strong educational, engagement and enforcement practices will have greater impact on controlling populations of farmed animals than banning them outright.**

With this in mind, Meat & Poultry Ontario does not support the phasing out of the import, possession, transport, propagation, buying, selling, leasing or trading of live Eurasian wild boar and their hybrids in Ontario. Many Ontario meat processors and butcher shops rely on products like wild boar from Ontario to distinguish themselves from their competitors. Prohibiting the growing of Eurasian wild boar by Ontario farmers (where many butcher shops find their supply) has direct effect on their business models and profitability, as well as limiting consumer choice. The potential economic impacts resulting from the regulation of these species to current producers and processors cannot be easily quantified.

Meat & Poultry Ontario would like to thank you for the opportunity to provide feedback and look forward to engaging in continued communications regarding the proposed regulatory amendments.

Sincerely,

Franco Naccarato
MPO Executive Director