

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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To Whom it May Concern:

Subject: ERO # 019-3468 Ontario's Strategy to Address the Threat of Invasive Wild Pigs

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers, and supporters, and 725 member clubs. We have reviewed *Ontario's Strategy to Address the Threat of Invasive Wild Pigs* (hereafter "the Strategy") and are supportive of the path that the Ontario government is taking to address this major threat to our environment and economy. We offer the following comments and recommendations with the goal of ensuring that wild pigs do not become established in the province.

The OFAH and Wild Pigs

The OFAH's wild pig advocacy traces back to 1991, when we conducted a literature review of conservation issues surrounding the farming and ranching of wildlife. Through this review, we identified wild boar as a major threat, specifically referencing the potential for this species to escape, go feral, establish wild populations, and inflict damage on native wildlife and habitats.

Our involvement on wild pigs has continued and we supported the Ministry of Natural Resources and Forestry's (MNRF) communication efforts around a 2014 wild boar escape in Eastern Ontario. In response to wild pig sightings by our members, we increased our advocacy efforts in 2018. At that time, wild pigs were not a topic of discussion in Ontario and no information on wild pigs was publicly available from the provincial government. The history of wild pigs in the United States and the prairie provinces of Canada has demonstrated both the speed at which wild pig populations can become established and the wide-ranging impacts of that happening on both the environment and the economy. Recognizing this threat, the OFAH worked to educate the public on the topic of wild pigs, while actively lobbying the government to take the actions that management experience has shown to be effective at preventing wild pigs from becoming established.

In September 2019, we sent a letter to Minister of Natural Resources and Forestry John Yakabuski expressing our concerns about wild pigs and detailing specific actions that we felt were essential for ensuring that Ontario remains wild pig-free. We would like to recognize and applaud the MNRF for acting on our concerns. By launching the Wild Pig Detectability Pilot Study (hereafter "the Pilot Study") in January 2020 and now consulting on the Strategy and the listing of wild pigs under the *Invasive Species Act, 2015* (ISA), the MNRF has demonstrated its commitment to addressing this threat through regulatory means and with boots on the ground.

General Comments

The four objectives outlined in the Strategy will significantly reduce the risk of wild pigs becoming established in Ontario. We will address each of the objectives and their associated actions in detail, but we have some general comments that apply to multiple objectives.

First, the Strategy makes it clear that to achieve the objectives, cooperation between different agencies across different levels of government is essential and the Strategy ultimately will not be effective if each agency does not fulfil its responsibilities. However, the Strategy does not provide any guidance on how this cooperative work will function. In our experience, issues that fall under the jurisdiction of more than one agency can be difficult to address, as each involved agency must balance the issue against its own mandate, responsibilities, and resources. At its worst, this creates bureaucratic stagnancy as the responsibility for an issue becomes a hot potato between agencies. Formalizing the roles and responsibilities of each involved agency, the resources that will be dedicated, and the timelines for crucial actions will allow the government to address the issue of wild pigs more effectively. This applies to cooperation between the MNRF and the Ontario Ministry of Agriculture, Food, and Rural Affairs (OMAFRA), with federal agencies such as the Canadian Food Inspection Agency and the United States Department of Agriculture, and with agencies in neighbouring provinces and states. Ultimately, we do not want to see the implementation of the Strategy delayed or hampered by a lack of inter-agency communication and coordination. We have seen similar challenges related to the enforcement of Ontario’s chronic wasting disease regulations at Canada’s international borders due to the lack of a clearly defined relationship between the MNRF and the Canada Border Services Agency.

1. **Recommendation:** Proactively formalize agreements between the MNRF, as Ontario’s lead ministry on wild pigs, and the other required ministries and agencies across different governments to ensure that the Strategy’s objectives and associated actions can be instituted without delays or barriers.

Second, for the Strategy to be effectively implemented the government will need to make significant investments in communication to ensure that the relevant audiences are aware of the new restrictions, requirements, obligations, liabilities, best practices, etc. Many of these audiences may not be reached by the ministries’ regular communications channels (e.g., pet pot-bellied pig owners or small-scale pork producers). These communications should clearly articulate any new restrictions, as well as the supporting information. This necessitates the creation of a communications plan to identify relevant audiences, the specific impacts of pigs as they relate to those audiences, and communications timelines, recognizing that there are seasonal patterns related to wild pig impacts (e.g., crop planting) and sightings (e.g., hunting seasons). Finally, the communications plan should include clear metrics for evaluating the effectiveness of the government’s communications efforts.

2. **Recommendation:** Develop a wild pig communications plan to ensure consistent, effective, and tailored messaging to support the prevention of wild pigs becoming established in Ontario.

Third, regulatory measures to prevent the establishment of wild pigs will only be effective if they are enforced. The OFAH has been frustrated in the past with a lack of enforcement action related to invasive species. While the proposed Strategy is promising, it will only truly reduce the risk of wild pigs becoming established if instances of violations are swiftly and effectively dealt with.

3. **Recommendation:** Dedicate the necessary enforcement attention to ensure that the actions under the Strategy occur, thereby preventing wild pigs from becoming established in Ontario.

Finally, we request that the Ontario government make the necessary investments in staff, funding, and equipment to ensure that the objectives and associated actions in the Strategy can be fully implemented. Government agencies have many active priorities, and we recognize that the new issue of wild pigs will add to an already extensive workload. As the Strategy points out, the most cost-effective point at which to address wild pigs is before they become established. Recognizing the financial strain imposed by the ongoing COVID-19 pandemic, there is no better time to invest taxpayers' money towards ensuring a wild pig-free Ontario.

4. **Recommendation:** Earmark funding within the budgets of the MNRF and OMAFRA to ensure that the resources required to achieve the objectives in the Strategy are available when needed.

Definitions

One of the major challenges in addressing wild pigs through regulatory means is adequately defining what a wild pig is. All pigs are members of the same species, *Sus scrofa*, and regulations must be carefully crafted to ensure that they comprehensively cover wild pigs without inadvertently infringing upon the pork industry. The pork industry is economically important to Ontario and has been a staunch proponent of action on wild pigs. The terms *domestic pig*, *farmed pig*, *heritage breed pig*, *Eurasian wild boar*, and *wild pig* are all comprehensively defined using language that will provide clarity in the application of the objectives and associated actions under the Strategy.

A term of importance that is not well defined is *hybrid*. As the Strategy points out, all members of *Sus scrofa* can interbreed and a large proportion of the wild pig population in the United States consist of animals that are hybrids between domestic pigs and Eurasian wild boar. As the Strategy proposes specific objectives related to hybrids, a specific definition of a hybrid is needed. Such a definition will be crucial for the implementation of Action 2.1 under Objective 2.

5. **Recommendation:** Formally define the term *hybrid*, especially as it relates to hybrids between a *domestic pig* and a *Eurasian wild boar*.

Objectives and Actions

Objective 1. Prevent the introduction of pigs into the natural environment.

The OFAH supports this objective as it represents the most crucial action to ensuring that wild pigs do not become established in Ontario. By preventing the introduction of pigs into the natural environment, we can eliminate a significant source of introduction risk.

Action 1.1: List wild pigs as an invasive species under the Invasive Species Act, 2015.

In our 2019 letter to Minister Yakabuski, we recommended that the MNRF “explore the feasibility of listing wild pigs under the *Invasive Species Act*.” As such, we are very pleased that the MNRF is taking this step. It provides clarity as to which ministry has jurisdiction for wild pigs (the MNRF) and supports wild pig response through regulatory tools and powers. As stated in our general comments above, these tools and powers must be backed up by enforcement actions to truly contribute to the goal of keeping Ontario wild pig-free.

See our response to ERO # 019-3465 *Regulating 13 invasive species and watercraft as a carrier of invasive species under Ontario's Invasive Species Act, 2015* for more detailed comments.

Action 1.2: Work with partners to develop, update and promote best management practices for outdoor pig containment, transporting pigs, and addressing escapes.

The OFAH supports this action. Ontario Pork’s *Small Scale Pig Production* guide and OMAFRA’s *Fencing for Outdoor Pig Production - Protecting your Livestock and the Environment* fact sheet provide excellent information on how to keep pigs contained. However, to truly halt the trickle of pigs into the wild and reduce the risk of diseases from wild pigs entering the pork industry, these best management practices should be mandatory, defined by regulation, and enforced.

If these management practices are not made mandatory, adoption will not be complete and enforcement will not be feasible, except reactively through the ISA. Making these practices mandatory puts the onus on people with pigs to be aware of and abide by any requirements. It also allows for enforcement actions to be taken to address instances where these management practices are not being followed, resulting in the risk of pigs escaping and establishing wild pig populations.

The Ontario government already dictates containment requirements for captive cervid operations receiving animals under a permit granted by the MNRF. These requirements are defined by *Ontario Regulation 666/98: Possession, Buying and Selling of Wildlife* under the *Fish and Wildlife Conservation Act, 1997* (FWCA) and are meant to address similar concerns about the escape of animals, the establishment of feral populations, and the spread of disease. The FWCA and its regulations are obviously not the correct piece of legislation to address matters related to the agricultural industry; however, similar regulations could be established for pigs under an appropriate act. If these management practices are made mandatory, OMAFRA will need to support the appropriate inspection capacity.

6. **Recommendation:** To prevent the escape of farmed pigs, make the containment requirements of outdoor pork operations mandatory under the appropriate act and support the needed inspection capacity to ensure compliance.

Action 1.6: Prohibit hunting of wild pigs in Ontario.

The prohibition on the hunting of wild pigs has been a key component of successful eradication programs in other jurisdictions. As such, we support the proposal to prohibit the hunting of wild pigs at this time. This is in line with our wild pig position opposing the designation of wild pigs as a game species under the FWCA, a position informed by a history of management experience showing that hunting is not effective for controlling or eradicating wild pigs and can instead increase wild pig spread and establishment. However, we do support maintaining a mechanism where a hunter can dispatch a wild pig or an escaped farmed pig, if that action is appropriate given the specific circumstances of the escape/sighting. We provide more comments around the Strategy’s proposed use of hunters in the section entitled “Role of Hunters in Wild Pig Management” below.

The government must clearly communicate to hunters and the broader public that the prohibition on wild pig hunting is not an “anti-hunter” policy, nor does it reflect poorly on Ontario’s hunting community. Hunter harvest is an excellent wildlife management tool that directly supports the conservation of Ontario’s wildlife and the ecosystems in which they thrive. Due to their unique ecology, especially their high reproductive rate, wild pigs are very much an exception in that hunter harvest cannot be effectively applied to their management. Furthermore, it is important to recognize that the vast majority of hunters are law-abiding, conservation-minded individuals and while hunting has contributed to the spread of pigs, especially in the United States, it can be attributed to the actions of a few unscrupulous individuals. Finally, it must be clearly stated that the proposal to prohibit the hunting of wild pigs is a proactive action. Ontario does not have established wild pig populations, wild pig hunting is not a common practice, and Ontario hunters are not moving wild pigs.

Hunters, and specifically the OFAH, have been the leading voice advocating for action on wild pigs in Ontario. This needs to be explicitly recognized so a prohibition on wild pig hunting is not interpreted to mean that Ontario’s hunters are part of the problem, when we are, in fact, the driving force behind a solution.

7. **Recommendation:** Clearly communicate the context behind the prohibition on the hunting of wild pigs so hunters and the public fully understand how it relates to the broader wildlife management landscape in Ontario.

Action 1.7: Support municipalities, where appropriate, in determining policy and legislative actions to address wild pigs in their communities.

While the OFAH supports policies and legislative actions that reduce the risk of wild pigs becoming established in Ontario, the responsibility for farmed and wild pigs rests with OMAFRA and the MNR, respectively, and we wish to see those ministries maintain clear leadership, inspection, and enforcement roles. Enacting and enforcing provincial-scale legislation, such as mandatory containment requirements as discussed under Action 1.2, will create a consistent regulatory landscape. It is not clear what additional benefits would come from municipal bylaws addressing “escaped, abandoned or otherwise uncontained animals and livestock” on top of the powers under the ISA.

8. **Recommendation:** Maintain provincial leadership in addressing wild pigs and engage with municipalities where by-laws could supplement, rather than duplicate, the role of provincial regulation and enforcement.

Objective 2. Address the risk posed by Eurasian wild boar in Ontario.

The OFAH agrees that the presence of Eurasian wild boar in Ontario increases the risk of wild pig populations becoming established. Pig farming has occurred in Ontario and across Canada for hundreds of years; however, the emerging issue of wild pigs appears to coincide with the introduction of Eurasian wild boar in the 1980s and 1990s as an agricultural diversification effort. We see addressing the threat of Eurasian wild boar as an integral component of this Strategy.

As discussed under the “Definitions” section above, the term *hybrid* must be clearly defined to increase the clarity of the legislation and support effective enforcement.

Action 2.1: Phase-out the possession of Eurasian wild boar and their hybrids in captivity in Ontario.

The OFAH supports the phase-out of Eurasian wild boar farming and possession. The OFAH has been calling for this action since 1991, in recognition of the potential for this species to escape, go feral, establish wild populations, and inflict damage on native wildlife. Furthermore, as stated in the Strategy, prohibiting the possession of Eurasian wild boar has been a key component of successful wild pig eradication programs in other jurisdictions.

Objective 3. Use a coordinated approach to remove wild pigs from the natural environment.

The OFAH appreciates the government’s commitment to removing wild pigs from the natural environment. Due to their high reproductive output, wild pig populations can exhibit exponential growth and go from a few pigs to many pigs very quickly. Therefore, rapidly responding to sightings and removing wild pigs from the landscape is crucial to prevent establishment. In addition to fulfilling the MNR’s responsibility to safeguard Ontario’s environment, this is also a fiscally responsible action as management costs increase with the number of pigs on the landscape. Simply put, early action saves taxpayers money.

We also support the proposed method of dealing with wild pigs through the coordinated efforts of trained professionals. This is in line with the position from our 2019 letter and has been shown to be effective in other jurisdictions. We expect that the government will make the necessary financial investment to maintain the needed capacity within the MNRF. Furthermore, we expect that the responsible sections within the MNRF will follow through on the implementation of the actions under this objective and remove wild pigs from the landscape in a transparent and accountable manner.

Action 3.1: Maintain reports of wild pig sightings in a central database.

The OFAH supports this action as a centralized database for wild pigs was one of the key needs that we identified in our 2019 letter. Having this information in a centralized location, rather than at individual district offices, allows for a more cohesive and efficient response to wild pigs.

Another key action that we identified in our letter was the creation of a publicly available annual report on wild pig sightings and response, akin to the *Ontario Chronic Wasting Disease Surveillance Program Update*. We applaud the MNRF for producing the *Annual Report on Invasive Wild Pig Sightings: 2019–2020* and ask that the MNRF commit in the Strategy to continuing this annual reporting, so the public is aware of how the wild pig situation in Ontario is evolving, the operations the MNRF is taking to fulfill the Strategy, and the effectiveness of those operations.

9. **Recommendation:** Commit to producing the *Annual Report on Invasive Wild Pig Sightings*.

Currently the MNRF offers two dedicated options for reporting wild pig sightings - email (wildpigs@ontario.ca) and an online platform (iNaturalist Wild Pig Reporting Ontario). Many Ontarians do not use a computer or email and not offering a telephone option is likely placing a barrier to reporting for these people. We have received feedback from both hunters and farmers, arguably the two most important segments of the public when it comes to wild pigs, saying that a telephone option is needed. Ontario already has a dedicated telephone reporting option for invasive species, the Invasive Species Hotline (1-800-563-7711). See our comments under Objective 4 on the Invading Species Awareness Program, an MNRF-OFAH partnership.

10. **Recommendation:** Expand the reporting options to include a telephone number.

Action 3.2: Develop and share communications to encourage public reporting of wild pig sightings.

The OFAH supports clear and effective communications on wild pigs. Wild pigs are a relatively new challenge being faced in Ontario and it is necessary to invest in communication efforts to educate the public on what wild pigs are, the issues they cause, what people should and should not do if they see a wild pig, and the actions needed to prevent them from becoming established in Ontario.

See **Recommendation #2**.

Action 3.3: Improve knowledge of the distribution, sighting frequency, characteristics (e.g., disease, genetics), and risks of wild pigs in Ontario.

The OFAH is a science-based organization, and we support the continued investment in research to ensure that Ontario's wildlife management practices represent the best scientific understanding. Our understanding of wild pigs, their ecology, and impacts is continuously evolving, and it is important to ensure that Ontario's wild pig response adapts to include new information. We do find that the description of this action lacks a clear direction and would appreciate more information on any current research needs that have been identified and how the MNRF is working to address those knowledge gaps.

See **Recommendation #4** on the need for dedicated funding to support the Strategy's objectives.

Action 3.4: Undertake actions to remove wild pigs from the natural environment.

The OFAH supports an approach to removing wild pigs from Ontario's natural environment that is informed by research and best management practices and based on whole-sounder removal. The protocol must clearly articulate which sections of the MNRF are responsible for carrying out wild pig surveillance and removal operations and cover all aspects of those operations. We look forward to seeing the MNRF's protocol and would be more than happy to contribute to its development.

11. **Recommendation:** Publicly consult on a protocol detailing the technical details of the government's actions to remove wild pigs from the natural environment.

Objective 4. Leverage expertise and resources by collaborating across ministries, with federal agencies, other jurisdictions, and industry stakeholders and partners.

The OFAH agrees with Objective 4 and its associated actions. Wild pigs represent a complex management challenge that cross multiple sectors, agencies, jurisdictions, and levels of government. We are pleased to see the Ontario government commit to working across these boundaries.

The OFAH is disappointed that our role is not explicitly acknowledged under this objective, or in the Strategy as a whole. In addition to being the organization that brought the issue of wild pigs to the attention of the government and then pushed for action on it, the OFAH is a partner with the MNRF in the Invading Species Awareness Program (ISAP). The ISAP undertakes education, monitoring, and eradication work related to invasive species. The ISAP has taken an active role in supporting the Pilot Study through education and the Wild Pig Surveillance Program, which loans trail cameras to members of the public to help detect wild pigs if they are present. All sightings received are relayed directly to the staff of the Pilot Study. Despite this long-standing partnership, neither the OFAH nor the ISAP are mentioned anywhere in the Strategy. We see a clear role of the ISAP in the implementation and success of the Strategy.

12. **Recommendation:** Explicitly incorporate the ISAP into the implementation of the Strategy in recognition of the long-standing and successful partnership between the MNRF and the OFAH in addressing the threat of invasive species.

Role of Hunters in Wild Pig Management

We agree that hunters have an important role to play in addressing the issue of wild pigs in Ontario. However, we feel that this section does not fully capture the complexity of how hunting and wild pig management intersect and, therefore, leads to some ambiguity around the specific role of hunters and the responsibilities of the MNRF. For example, this section states that hunters will play a vital role in the protection of property from damage by wild pigs. This seems to contradict wording earlier in the Strategy that clearly states that hunting is not an effective method for wild pig control, a statement well supported by past management experience.

Based on the wording of this section, we have concerns that the MNRF may come to view hunters as an acceptable alternative to whole-souder removal by trained wildlife professionals, especially if the government does not support this capacity through funding. We recognize that the use of hunters is an attractive option, because it is relatively cost-free to the government; however, outside of very specific circumstances, it will not be effective. Based on management experience from the United States, such a course of action will almost certainly exacerbate the problem by educating and scattering pigs, and ultimately increase the risk of wild pigs becoming established in the province. The MNRF should only task hunters with dispatching wild pigs once the MNRF has done its due diligence to ensure this is the appropriate action and does not risk worsening the situation. Factors such as the number, age, and sex of the pigs present, the habitat, the relationships with neighbouring landowners, and the time of year should all be considered. Ultimately, the onus rests with the MNRF to employ the best option for removing wild pigs from the landscape and the process for choosing this option must be clearly articulated in the protocol referenced under Action 3.4. In support of this, the reporting of sightings must always be communicated as the essential first action.

13. **Recommendation:** In the protocol described in Action 3.4, include a decision tree that will define when and how hunters will be used to remove wild pigs from the landscape.

Conclusion

Overall, the OFAH is pleased with the Ontario government's ongoing action to address the threat of wild pigs. Considering our recommendations, we support the Strategy as we feel it builds on proven management experience and will reduce the risk of wild pigs becoming established in the province.

Thank you for this opportunity to provide comment. The OFAH stands ready to assist the government in its efforts, both through existing partnerships like the ISAP and in any other way that might prove useful.

Yours in Conservation,



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