

June 7, 2021

Public Input Coordinator
Ministry of Natural Resources and Forestry
Fish and Wildlife Policy Branch
300 Water Street, P.O. Box 7000
Peterborough, Ontario
K9J 8M5

Sent via email to: invasive.species@ontario.ca
and submitted online via Environmental Registry of Ontario (ERO)

To Whom It May Concern:

RE: ERO # 019-3465: Regulating 13 Invasive Species and Watercraft as a Carrier of Invasive Species Under Ontario's *Invasive Species Act, 2015*

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across the province, supporting our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. OFA works to ensure the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability of our farm businesses. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA appreciates the opportunity to provide comments on ERO # 019-3465: Regulating 13 Invasive Species and Watercraft as a Carrier of Invasive Species Under Ontario's *Invasive Species Act, 2015*. As with our previous submission on [ERO # 019-1162](#), OFA will only comment 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.

OFA supports adding European frogbit, yellow floating-heart and fanwort to the prohibited and restricted invasive species lists under the *Invasive Species Act, 2015*. Adding European frogbit, an aquatic plant, to the prohibited invasive species list would help prevent this species from becoming established in municipal drains. The plant grows in slow-moving water or sheltered areas, such as inlets of larger lakes, slow-moving rivers, ponds, and ditches. As with European water chestnut and water soldier, OFA understands that European frogbit is found in Ontario and is causing a significant negative impact on provincial wetlands, lakes and waterways. Yellow floating-heart, and fanwort, two other aquatic plants, also prefer to grow in slow-moving waters,

such as streams, small rivers, ponds, lakes, and ditches. Adding these species to the restricted species list will also help prevent them from potentially becoming established in municipal drains. Natural watercourses serve as outlets for municipal drains, constructed under Ontario's *Drainage Act*, to facilitate the removal of excess waters from agricultural land. 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. OFA believes it is important to prevent these plant species from becoming established in municipal drains; adding European frogbit to the prohibited invasive species list, and yellow floating-heart and fanwort to the restricted species list under the *Invasive Species Act* will help accomplish this goal.

The Ministry is proposing species-specific rules for plants in addition to the general prohibitions in the Act. These additional prohibitions would help reduce the risk of those species being introduced or spread further in Ontario. OFA supports these species-specific rules.

OFA supports wild pigs being included as a restricted invasive species under the *Invasive Species Act, 2015*. Including wild pigs as a restricted species under the Act would prohibit the release of any pig into the environment, and prohibit bringing a live pig into a provincial park or conservation reserve. It will also give enforcement officers the authority to address illegal pig releases. The proposal combines domesticated pigs, pot-bellied pigs, and Eurasian Wild Boar into the same category under the Act. Wild pig populations, if they become established, pose significant risks to the pork industry, and can have devastating impacts on crops, animals, native wildlife and farmer livelihood. Wild pigs could decimate Ontario's pork sector through the transmission of diseases such as African Swine Fever, carried by wild pigs and transferred to domestic pig herds. All pigs, wild, pet, or otherwise outside a fence have the potential to pose a disease risk to farmed, domestic pigs. OFA believes that the negative impacts on native wildlife, ecosystems and biodiversity warrant the development and implementation of policies and programs to curtail the growth and spread of wild pigs across Ontario. OFA supports prescribing Ontario as a control zone for pigs, where in the event a pig accidentally escapes containment, the owner would need to notify the Ministry immediately, and ensure the animal is recaptured or dispatched as soon as possible.

OFA further supports prohibiting the hunting of wild pigs in Ontario. Research and management from other provinces and states have shown that hunting of individual pigs has minimal effect on wild pig populations. Instead, hunting can scatter groups of pigs, teaches the animals to avoid hunters, and increases reproductive rate as a response. Additionally, allowing hunting of wild pigs could potentially encourage individuals to intentionally release pigs into the wild to take advantage of a hunting season. OFA supports exceptions that would provide landowners or agents acting on their behalf the ability to protect their property or crops from damage by wild pigs, provided the sighting is reported.

Eurasian wild boar and their hybrids are imported and raised as alternative farmed livestock for meat in Ontario. To mitigate the risks associated with the establishment of wild boar and hybrid populations in Ontario, the Ministry is proposing a gradual phase-out of the importation, possession, transport, propagation, buying, selling, leasing, or trading of live Eurasian wild boar and their hybrids. OFA supports this proposal and believes that this phase-out will help Ontario avoid damages similar to those experienced in other provinces and the United States. According to the Ministry of Natural Resources and Forestry's *Annual Report on Invasive Wild Pig Sightings: 2019-2020* which analyzed wild pig sightings from the general public over the last two years, many of the Eurasian wild boar sightings were near properties that house captive wild boar. This proximity is an indicator that the sightings were most likely animals that had escaped confinement or their offspring. However, OFA is concerned that a two-year phase-out may allow for Eurasian wild boar to become established in Ontario in that time, and recommends an immediate buy-out of any Eurasian wild boar and hybrids that are currently being farmed. For additional information, please see OFA's comments on ERO #019-3468: Ontario's Strategy to Address the Threat of Invasive Wild Pigs.

The Ministry is proposing an amendment to s. 11 of O. Reg. 354/11 under the *Invasive Species Act*. Currently under s. 11, certain activities are exempt from the prohibitions of depositing or releasing restricted invasive species. These include common activities that would interact with these species such as ditch cleaning, agricultural practices, and maintenance activities, provided the intention is not to deposit or release the species. This exemption applies to all restricted species, including plants, fish, invertebrates, and animals. There is concern that this exemption could potentially introduce these species to new areas as a result of these activities. The proposed amendments to s.11 would make it that the exemption only applies to plant species, and to add the requirement that reasonable precautions be taken to prevent the establishment of the invasive plant species outside the immediate area where the activity is taking place. Invasive species threaten Ontario's native plant and animal species, and agricultural crops and animals. OFA believes precautions should be taken to prevent the unintentional establishment or spread of invasive species.

The OFA appreciates this opportunity to provide its agriculture-centered perspective on European frogbit, yellow floating-heart, fanwort and wild pigs.

Sincerely,



Peggy Brekveld
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