

Public Input Coordinator  
MNRF - Fish and Wildlife Policy Branch  
300 Water Street  
P.O. Box 7000  
Peterborough, ON K9J 8M5  
and  
Biodiversity Coordinator  
MNRF - Biodiversity Section  
300 Water Street  
5th Floor, North tower  
Peterborough, ON K9J 3C7

June 7, 2021

**RE: ERO# 019-3465 Regulating 13 invasive species and watercraft as a carrier of invasive species under Ontario's Invasive Species Act, 2015 and ERO# 019-3468 Ontario's Strategy to Address the Threat of Invasive Wild Pigs**

Dear Ministry,

The National Farmers Union – Ontario (NFU-O) is an accredited farm organization representing thousands of sustainable family farmers in Ontario and has advocated for farm families across Ontario and Canada since 1969. Members work together to achieve agricultural policies that ensure dignity and income security for farm families, while protecting and enhancing rural environments for future generations. The NFU-O collaborates locally, nationally and internationally to research, educate, and share effective solutions that lead to a better world for farm families and their communities.

The NFU-O appreciates the opportunity being given to comment on the proposed changes to the *Invasive Species Act, 2015*, in accordance with “Draft: Ontario’s Strategy to Address the Threat of Invasive Wild Pigs”, which outlines a proactive approach to prevent the establishment of invasive wild pigs in the province. The NFU-O agrees that feral populations of wild pigs are problematic and early intervention is key. Therefore, we support the creation of new rules and regulations preventing the introduction of pigs into the natural environment (Objective 1), and adding pigs as a restricted invasive species under the *Invasive Species Act, 2015*, prohibiting under the Act to release a pig in Ontario, to bring live pigs into provincial parks and conservation reserves, and to prescribe Ontario as a control zone for pigs, requiring the ministry to be notified immediately and the escaped pig recaptured or dispatched as soon as possible. We also support using a coordinated approach to remove wild pigs from the natural environment (Objective 3), and agree with prohibiting hunting of wild pigs with the exceptions for activities to protect property from damage caused by wild pigs, under the Act.

However, we are very concerned about and disagree with Objective 2, Action 2.1 of the strategy, and the inclusion of ‘over a two-year period, phase-out the import, possession, transport, propagation, buying, selling, leasing, or trading of live Eurasian wild boar and their hybrids’ under the Act, and the impacts this will cause to current producers, processors, and consumers of wild boar in Ontario.

The NFU-O is recommending that current producers and processors of wild boar be consulted in this process before a decision is made to prohibit the raising of wild boar for meat in Ontario. There is an established niche market for wild boar meat in Ontario that will be forced to turn to imported products if production of wild boar ceases in the province. There is an opportunity to work together with the handful of family farms in the province that are responsibly raising wild boar, to share and develop best management practices, including fencing and containment, space, and feeding requirements. Along with the creation of best management practices, the NFU-O recommends the development and implementation of recovery protocol for escaped wild boar, similar to what has been developed by OMAFRA and MNRF for farmed wild deer and elk.

We would also like to emphasize the importance of growing the diversity of outdoor, farmed pigs by small and medium sized family farms in Ontario and would not want any new regulations to discourage the growth of this sector by placing increased restrictions or costs related to containment on these farmers. We strongly recommend working with small and medium sized family farmers to determine best management practices for outdoor, farmed pigs, to ensure they remain farmed outdoors, and to provide a financial compensation strategy for any new fencing infrastructure requirements that may be enforced through new regulations.

The NFU-O would also support increased regulations around the housing and care of domestic pigs kept for pets in Ontario municipalities, along with tracing and release regulations to discourage the release of domestic pigs kept as pets in Ontario.

As the strategy report states, at this time, there is no evidence to suggest that wild pig populations are self-sustaining and breeding in the province. Therefore, the NFU-O feels that a coordinated approach that focuses on the creation of new rules and regulations prohibiting the release of pigs in Ontario, along with the removal of existing populations of wild pigs in the province is the best strategy moving forward.

Thank you for your consideration of our comments on “Draft: Ontario’s Strategy to Address the Threat of Invasive Wild Pigs” and proposed changes to the *Invasive Species Act, 2015*.

Sincerely,



Don Ciparis  
President, National Farmers Union - Ontario