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LONG-TERM THINKING FOR TODAY'S ISSUES

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## 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 Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

The CFFO recognizes the significant risk that established wild pigs can pose in Ontario, including to agriculture in general, to the pork industry specifically through the risk of spreading disease and risk to trade, as well as to the natural environment and native species. It is clear from other regions in both Canada and the U.S. that once established, removing wild pigs is difficult, if not impossible. The CFFO therefore supports the need to take significant action across Ontario to prevent establishment of pigs in the wild.

The CFFO is largely supportive of the actions proposed in "Draft: Ontario's Strategy to Address the Threat of Invasive Wild Pigs" as appropriate and likely to be effective in addressing this risk. In order to strengthen the effectiveness of the strategy, the CFFO calls for:

- a cost-share program for fencing and enclosures for farmers raising pigs outdoors
- immediate prohibition on establishing new wild boar farm operations

- clearer definition of wild boar hybrids that will be prohibited for farming purposes
- compensation for farm assets and value of inventory and a buy-out option for current wild boar farming operations

## Prevent the Introduction of Pigs into the Natural Environment

The CFFO recognizes pigs are not native to North America and have characteristics that lead them to be able to survive, thrive and reproduce quickly outside of captivity. The proposal defines “wild pigs” as “any animal of the species *Sus scrofa* that is not contained or under the physical control of any person or is otherwise roaming freely.” This definition is appropriate in order to address the threat posed by all varieties of pigs outside of containment. CFFO supports Action 1.1 to name wild pigs, so defined, as an invasive species under the *Invasive Species Act, 2015*.

The CFFO supports the many instances throughout the strategy, including Actions 1.2, 1.3, 1.4, 1.5, 1.7 and all of Objective 4, which propose collaboration with others, including working with pig owners, partners in industry, not-for-profit groups, other ministries and levels of government and neighbouring jurisdictions to help address the risks posed by wild pigs.

The CFFO also supports Action 1.6 (“Prohibit hunting of wild pigs in Ontario”) so long as it is in conjunction with the continued permission for “landowners or agents acting on their behalf [to] still be able to protect property from wildlife damage, including for the purposes of biosecurity” as currently indicated in the draft proposal.

The CFFO also supports the actions proposed under Objective 3 (“Use a coordinated approach to remove wild pigs from the natural environment”) as methods to prevent higher risk of wild pigs becoming established in the province.

The CFFO is also concerned about ensuring producers who are serving small markets and using farming methods that include raising domesticated breeds (*sus scrofa domesticus*) outdoors can continue to produce pigs in Ontario. Actions 1.2 (“Work with partners to develop, update and promote best management for outdoor pig containment, transporting pigs, and addressing escapes”) and 1.5 (“Collaborate with partners in developing and promoting guidance for responsible pig ownership”) should include detailed guidance for proper fencing and enclosures for raising pigs outdoors. Instigating a cost-share funding program for suitable fencing and enclosures will be helpful in ensuring pigs raised outdoors are properly contained.

## Phase-out the Possession of Eurasian Wild Boar and Their Hybrids in Captivity in Ontario

The CFFO supports the proposal to end farming of Eurasian wild boars and their hybrids by phasing out their possession in captivity over a two-year period, including “the import, possession, transport, propagation and sale of Eurasian wild boar and their hybrids in the province.” The CFFO has some recommendations on the details of how this should be implemented.

The proposal to end farming of Eurasian wild boar and hybrids should also include a provision preventing the establishment of new farming operations, effective immediately.

Definitions of what will be considered a “wild boar hybrid” need to be more detailed and clearer, since all domestic farm pigs are part of the *Sus scrofa* species and related to wild boars in some way. What will

be required for a farmer to demonstrate that the variety of pigs they are raising is accepted under the definition of *Sus scrofa domesticus* and not prohibited under the definition of “hybrid” Eurasian wild boar?

Ontario had allowed and even encouraged farming of Eurasian wild boars as part of diversification of farm commodities. Clearly, in the past the benefits of this type of farming were deemed to outweigh the risks. Farmers who have been engaging in raising Eurasian wild boar have been doing so legally. Considering that so far Ontario does not have a significant problem with wild pigs established in the province, it is clear that these farmers on the whole have been doing a good job of managing their animals responsibly.

Since the government now considers the risk of engaging in this type of farming too risky, such that it will be rendered illegal, the CFFO calls on government to provide compensation to those farmers currently engaged in raising Eurasian wild boars and their hybrids. Farmers engaged in this type of farming have made significant investments in their operations.

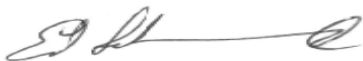
We recommend that government engage with producers to establish reasonable compensation to allow these farmers to recover their investment and transition to a new livelihood. This should include compensation for farm assets and value of inventory as well as a buy-out option for producers of Eurasian wild boar. The current proposed timeline of two years seems reasonable to allow these farmers time to transition their businesses.

## Conclusion

The CFFO recognizes the significant risk that established wild pigs pose for Ontario. The CFFO is largely supportive of the actions proposed in “Draft: Ontario’s Strategy to Address the Threat of Invasive Wild Pigs” as appropriate and likely to be effective in addressing this concern. To strengthen the effectiveness of this strategy, we have asked that in addition the government offer a cost-share program for fencing and enclosures for outdoor pig farms, immediate prohibition on establishing new wild boar farm operations, clearer definition of wild boar hybrids that will be prohibited for farming purposes, and compensation for farm assets and value of inventory and a buy-out option for current wild boar farming operations.

We appreciate your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President  
Christian Farmers Federation of Ontario