



June 3, 2021

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

Sent by e-mail: invasive.species@ontario.ca

Dear Coordinator,

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

Ontario Pork welcomes the opportunity to provide comments to MNRF's consultations EBR 019-3468 and EBR 019-3465 regarding wild pigs in Ontario.

Our organization is the voice of the province's 1,143 pork farmers, and a leader in the agriculture industry. Led by producers, Ontario Pork is committed to sustainable growth in the pork sector, delivering government representation, research investment, and industry improvements in areas including animal care and environmental sustainability, while growing the brand and reputation of producers and their product. Ontario's pork industry "farm to fork" generates \$2.74 billion in economic output and 15,339 in full-time equivalent jobs.

In other jurisdictions, wild pigs pose a significant risk to the pork industry and have proven to have a detrimental impact on animals, crops and farmer livelihood. Wild pigs have also spread African Swine Fever (ASF), a reportable disease that decimates entire herds and jeopardizes trade. While ASF has not been found in North America, the importance of addressing wild pigs in Ontario, and across Canada, cannot be overstated.

Eurasian wild boars, although not native to Canada, nor North America, became part of the wild pig population. Wild pigs cause destruction and can spread deadly diseases. Eradication efforts in other jurisdictions within North America have been unsuccessful. **Ontario Pork strongly supports Ontario's approach, which includes ensuring that the federal government and other jurisdictions are part of the efforts to ensure that wild pigs do not become established in Ontario.**

Ontario Pork also appreciates MNRF's acknowledgement of the important leadership role our organization and members have in ensuring wild pigs do not become established in Ontario, and the Ministry's commitment to continued collaboration with stakeholders.

In February 2020, Ontario Pork, supported by a letter from the Canadian Pork Council, provided input to MNRF regarding wild pigs and possible regulation under the *Invasive Species Act, 2015*. Our comments focused on: eradication, a moratorium on new wild boar farms, banning of hunt farms, and licensing and increased fencing requirements for outdoor pig production. Our submission will address these actions, as well as proposed strategies in MNRF's document, *Ontario's Strategy to Address the Threat of Invasive Wild Pigs*.

DEFINITIONS

MNRF defines **wild pig** 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 includes a pig of any type (i.e., domesticated pig, Eurasian wild boar, or hybrid) that has escaped or been released from containment, is no longer on the owner's property, and is free roaming. It also includes any pigs that were born in the wild.*

Questions:

- How will MNRF determine if the animal is a hybrid, or if it is a wild boar? The large majority of people, by sight alone, would not be able to discern different types of pigs.
- What percentage of a breed will be considered when determining if the animal is a hybrid?
- Will MNRF undertake genetic testing of a suspected wild pig to determine this?

Domestic feral pigs

Ontario Pork **recommends that the wild pig definition be revised to include domestic feral pigs**, rather than just domestic pigs, given that once a pig is not contained or under the physical control of any person or is otherwise roaming freely, it has in effect become a domestic feral pig.

MNRF PROPOSED OBJECTIVES AND ACTIONS

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

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

Ontario Pork supports the inclusion of wild pigs as an invasive species under the Act, which would:

- Prohibit the release of any pig into the natural environment,
- Prohibit bringing a live pig into a provincial park or conservation reserve,
- Prohibit hunting wild pigs with exceptions (i.e., for dispatch of escaped pigs) for activities to protect property from damage caused by wild pigs,
- 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, and
- Apply Sections 23 and 27 of the *Act* to wild pigs.

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

Ontario Pork agrees with the importance of our PigTrace program as well as our Small Scale Pig Production guide, and that as a key partner, we will continue to share resources and promote responsible farming practices.

However, per our February 2020 submission to MNRF's wild pig consultation, **Ontario Pork continues to recommend more stringent fencing requirements for pigs that are raised outdoors.** OMAFRA's fact sheet, *Fencing for Outdoor Pig Production — Protecting your Livestock and the Environment*, remains a good resource for pig producers regarding appropriate fencing, and Ontario Pork continues to share this document with our members.

Action 1.3.: Collaborate with partners to develop and deliver outreach for pig owners and producers on their obligations if a pig escape occurs.

Ontario Pork supports MNRF, OMAFRA, and partners developing and delivering outreach to inform pig owners and producers of their obligations if a pig escapes, including any obligations under the *Invasive Species Act, 2015*.

Action 1.4.: Coordinate with federal and industry-led initiatives to support traceability of escaped pigs (e.g., PigTrace).

Ontario Pork supports the importance of PigTrace and MNRF's statement that this program, while primarily intended for emergency management purposes, can also be helpful to reunite escaped pigs with their owners, as well as in the event an animal escapes during transport.

Action 1.5.: Collaborate with partners in developing and promoting guidance for responsible pig ownership.

Action 1.7. Support municipalities to determine policy and legislative actions to address wild pigs in their communities

Given that experiences in other jurisdictions have shown that hunting is not an effective approach for eradicating wild pig populations, **Ontario Pork supports a regulatory amendment that would ban hunting of wild pigs, except for landowners, or agents' action on their behalf, to protect their property from wildlife damage and for biosecurity purposes, and when an accidental pig escape occurs, hunters may also assist pig owners in recapturing or dispatching the escaped pig as soon as possible.**

Given that MNRF has found that a substantial number of pig sightings are actually pot-bellied pigs, **Ontario Pork agrees that the Ministry should continue to work with OMAFRA and other partners to promote information developed by groups such as Swine Health Ontario, on responsible pig ownership, as well as OMAFRA encouraging municipalities to develop by-laws to address escaped, abandoned or otherwise uncontained animals.**

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

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

Ontario Pork supports, over a two-year period, phasing-out the import, possession, transport, propagation, buying, selling, leasing, or trading of live Eurasian wild boar and their hybrids in the province, under the following conditions:

- MNRF provide detailed information regarding support for farmers who are required to shut-down their Eurasian wild boar production within two years, to include compensation for farm assets and value of inventory, and
- MNRF give consideration to providing a buy-out for producers of Eurasian wild boars.

We also recommend the following to be included in the legislation:

- **A ban on any new Eurasian wild boar farms, to be effective immediately.**

Objective 3: Use a coordinated approach 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.

Objectives 3 and 4, with their focus on partnerships and collaboration, information gathering and sharing, leveraging expertise and resources across jurisdictions, and approaches to wild pig removal from the natural environment, are supported by Ontario Pork. **We also support MNRF contributing to federal activities (Action 4.2.) to support information and collaboration at a national level and well as support for continued surveillance programs to understand the prevalence of wild pigs in the natural environment.**

We do, however, request the following:

- Action 3.4.: Ontario Pork participation in MNRF's protocol development that will inform removal activities, and take risks into account e.g., risks to the agriculture industry, and
- Action 4.1.: Further information be provided on how MNRF is working to *strengthen relationships with bordering jurisdictions to share information on the distribution of wild pigs and promote monitoring and management activities.*

Ontario Pork appreciates the opportunity to provide input on wild pigs and the *Invasive Species Act, 2015* and our continued inclusion as a key partner and stakeholder in wild pig discussions and any actions to be taken that impact, or will potentially impact, Ontario's pork sector.

Sincerely,



John de Bruyn
Board Chair