



Ontario Federation of Agriculture

Ontario AgriCentre

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July 15, 2016

Mr. Jeremy Downe
Invasive Species Program and Policy Advisor
Ministry of Natural Resources and Forestry
300 Water Street
Peterborough, Ontario
K9J 8M5

Dear Mr. Downe;

RE: EBR Registry No. 012-7673 Guidance for Invasive Species Assessments under the Invasive Species Act, 2015

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 36,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

In 2014, the farm gate value of agricultural crops, livestock and poultry produced on Ontario farms was \$12.7 Billion. We firmly believe that government actions to protect against invasive species must extend to addressing the potential risks to agricultural crops, livestock and poultry posed by an invasive species.

Throughout the consultation document, the focus appears to be solely on the natural environment. While OFA fully recognizes the need to respond to the threats to the natural environment posed by invasive species, we further believe that invasive species can also pose threats to agricultural crops, livestock and poultry. Therefore, Invasive Species Assessments must also consider the risks to agricultural crops, livestock and poultry posed by an invasive species.

On page 6 it states that agricultural crops "will generally not be evaluated". "Generally" is too vague. The consultation paper provides no indication of the circumstance whereby an agricultural crop could be considered a potential invasive species. OFA demands that the Ministry of Natural Resources and Forestry clearly delineate the circumstance whereby an agricultural crop could be considered a potential invasive species.

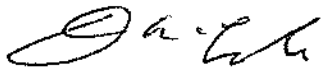
On page 7, the consultation paper indicates that the Ministry of Natural Resources and Forestry is open to considering assessments conducted in other jurisdictions. We agree

that there is merit in this from the perspective of saving time and money, but we would add the caveat that Ontario would only consider assessments from jurisdictions with geographies and climates that are very similar to Ontario's.

The six-step Assessment Approach described on pages 9 through 11 is sound. We do, however, note that there is no mention of the timelines envisioned to move a species through all six steps. We look forward to the Ministry of Natural Resources and Forestry's inclusion of specific timelines in the six-step Assessment Approach.

On behalf of OFA's 36,000 farm family businesses across Ontario, I thank you for your consideration of our perspective on the development of Guidance for Invasive Species Assessments under the Invasive Species Act, 2015.

Yours truly,

A handwritten signature in black ink, appearing to read "Don McCabe".

Don McCabe
President

DM/pj

cc: The Honourable Kathryn McGarry; Minister of Natural Resources and Forestry
The Honourable Jeff Leal; Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors