

April 18, 2019

Ms. Fiona McGuinness
Species Conservation Policy Branch
Ministry of Environment, Conservation and Parks
300 Water Street
Floor 5N
Peterborough, ON
K9J 3C7

Dear Ms. McGuinness;

RE: EBR Registry 013-4739 Requesting additional information to be considered in the development of recovery strategies for eight species at risk

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 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.

Although the above noted EBR Registry posting applies to eight different species, OFA will only comment on American ginseng.

Currently, it is illegal to cultivate either wild-simulated or woods-grown American ginseng. We believe this restriction only serves to increase the perceived value of wild ginseng, and thereby increase its likelihood of illegal harvest. Therefore, OFA proposes that the recovery strategy for American ginseng permit wild-simulated or woods-grown cultivation of American ginseng. Mimicking wild ginseng through wild-simulated or woods-grown cultivation would enhance the recovery of wild American ginseng.

Sincerely,



Keith Currie
President

KC/pj

cc: OFA Board of Directors