

July 25, 2019

Public Input Coordinator
Species Conservation Policy Branch
Wildlife Section
Ministry of Natural Resources and Forestry
300 Water Street, 5th Floor
Peterborough, ON
K9J 3C7

Public Input Coordinator,

RE: ERO 019-0154 Updating our Chronic Wasting Disease Surveillance and Response Plan

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.

OFA will provide no comments or suggestions for changes to the proposed updates to Chronic Wasting Disease (CWD) Surveillance & response plan as we are comfortable with its proposed modifications. That being said, we do advocate that the provincial government develop clear and unequivocal messaging should CWD be detected in either captive or wild deer or elk in Ontario.

The discussion paper proposes to broaden the prohibition on the import high-risk cervid parts into Ontario by preventing the entry of all parts of any cervid hunted outside of Ontario in a CWD-positive jurisdiction unless the animal has been tested and confirmed to be negative for CWD. OFA supports this initiative but we do have two concerns. Firstly, how would the prohibition of import into Ontario from Alberta, Saskatchewan or Quebec be achieved? Travellers into or out of Ontario at our provincial borders are not screened or monitored. Secondly, Canadian Border Services Agency staff at Canada/US border points would need to be aware of Ontario's CWD concerns and have an up-to-date list of US states where CWD is found for this to have any positive effect.

The discussion paper proposes to expand the Ministry of Natural Resources and Forestry's cervid import permit requirements to include all cervid species, not just those native to Ontario. OFA supports this proposed change.

The discussion paper proposes to implement a general prohibition on the import of live cervids of any species from any jurisdiction in which CWD is found. Assuming that any list of CWD-positive jurisdictions would be maintained and be current, OFA supports this change.

The discussion paper proposes to expand the prohibition on the use of any product that contains or purports to contain the faeces, urine, blood, gland oil, saliva or other bodily fluids of a cervid for the purpose of hunting to include the use or possession of such substances in Ontario for any purpose. OFA supports this proposed change.

The discussion paper proposes to support, as required, the quarantine and/or destruction of any CWD-exposed captive herds. OFA would support this on the condition that the current federal “Compensation for Destroyed Animals Regulations” schedules under the Health of Animals Act would be used in the event of the destruction of CWD-exposed captive cervids. It further proposes to consider temporary hunting/trapping season closures and closures of trails and parks within a core control zone. OFA would support this action too.

The discussion paper proposes to enact controls to reduce the potential spread of the disease, including prohibiting baiting and feeding of wild cervids and restrictive movement of captive and wild cervids and their parts beyond the surveillance and control zone. Feeding wild cervids brings unnaturally large numbers of deer or elk into close contact with each other, possibly creating the conditions necessary for the development and spread of CWD. Rarely is the feeding of wild deer or elk every truly necessary. Amendments to the Fish and Wildlife Conservation Act enacted in 2009 gave the Minister the authority to develop regulations governing supplemental feeding of wildlife. To date, there has been no activity towards regulating supplemental feeding of wildlife in general, or cervids in particular. OFA recommends that such regulations to govern the supplemental feeding of wild deer and/or elk be developed and implemented. The discussion paper further proposes implementing controls on the disposal of cervid carcasses and body parts. OFA would support this action too.

The discussion paper proposes containing/engaging other agencies and stakeholders. The paper makes no mention of farm organizations, despite the repeated references to “farmed cervids”. OFA strongly requests that farm organizations be specifically identified among other agencies and stakeholders.

The discussion paper seems to infer that cervid farms pose the main CWD risk with little to no recognition of other situations where captive cervid are kept, such as zoos, theme parks, etc. To be effective, the CWD Surveillance and Response Plan must speak to all captive cervid situations.

OFA welcomes this opportunity to provide its agricultural perspective on updating our Chronic Wasting Disease Surveillance and Response Plan. We also note our comments on the White-tailed Deer Population Objective and Harvest Management Guidelines. We look forward to the province’s updated Chronic Wasting Disease Surveillance and Response Plan reflecting our recommendations.

Sincerely,



Keith Currie
President

KC/pj

cc: The Honourable John Yakabuski, Minister of Natural Resources and Forestry
The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors