

February 1, 2020

Ms. Sarah Parna
Species Conservation Branch
Ministry of the Environment, Conservation and Parks
300 Water Street
Floor 5N
Peterborough, Ontario
K9J 3C7
sarah.parna@ontario.ca

Dear Ms. Parna;

RE: Environmental Registry of Ontario posting 019-0920 Developing government response statements for eight species at risk under the Endangered Species Act, 2007

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.

Ontario's agricultural and agri-food sector is among the most diverse agriculture sectors in North America. Well over 200 different agricultural commodities are grown and raised here; more than any other Canadian province and most US states.

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 government response statement for American ginseng recognize and 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.

We also note in many of the government response statements encouraging "participation in citizen science data collection programs". While individuals engaged in citizen science data collection are no doubt well-intentioned, we firmly believe that the Ministry's encouragement must be tempered with clear cautions that most of the lands in southern Ontario are privately owned, and that anyone wanting to enter these lands, even to gather citizen science data to improve the recovery of endangered and threatened species must first obtain the permission of the owner or occupant of that land. We request that the finalized government response statements include

clear, unambiguous language emphasizing that persons endeavouring to collect citizen science data must first obtain the permission of the owner or occupant of that land.

Yours truly,



Keith Currie
President

KC/pj

cc: The Honourable Jeff Yurek, Minister of the Environment, Conservation and Parks
The Honourable Ernie Hardemen, Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors