

April 14, 2020

Biodiversity Coordinator
Ministry of Natural Resources and Forestry
Biodiversity Section
300 Water Street, 5th Floor, North Tower
Peterborough, Ontario K9J 3C7

To Whom it may concern;

RE: Environmental Registry of Ontario Number 019-1163 Developing Prevention and Response Plans for European water chestnut and water soldier under the *Invasive Species Act*, 2015

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.

From the Draft Prevention and Response Plans for these two species, we understand that both plants are present in several key Ontario waterways. Natural watercourses serve as outlets for municipal drains, constructed under Ontario's *Drainage Act*, to facilitate the removal of excess waters from agricultural land.

While we hope that neither European water chestnut nor water soldier becomes established in any of our municipal drains, we believe it is wise to be prepared. Municipal drains often require maintenance and repairs to remove excess sediments, address bank slumps or blockages in the drain that impair its function. The *Drainage Act* obligates the municipality, through their Drainage Superintendent, to undertake any maintenance or repairs necessary to restore the drain to its original design specifications. If either European water chestnut or water soldier were to be found in a municipal drain, the Drainage Superintendent would need to know of the plant's presence, how to deal with these plants during maintenance and how any equipment used in the course of maintenance must be cleaned to ensure no unintentional transfer to another watercourse. OFA recommends that the Ministry of Natural Resources and Forestry ensure that Drainage Superintendents are aware of the requisite protocols and practices to mitigate against the unintentional spread of either European water chestnut or water soldier.

Sincerely,



Keith Currie
President

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