

August 14, 2020

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

To Whom it May Concern,

Re: ERO 019-2065 Proposal to reduce the risk of chronic wasting disease entering Ontario

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.

1. Prohibiting import of all species of live cervids into Ontario while allowing for certain exceptions:

OFA supports the Ministry of Natural Resources and Forestry's efforts to keep Ontario CWD-free by prohibiting the import into our province of all species of live cervids. However, how would the import prohibition from other Canadian jurisdictions, such as from Alberta, Saskatchewan or Quebec be achieved? Travellers into or out of Ontario at our provincial borders are not screened or monitored. Vehicles are not checked. In addition, Canadian Border Services Agency staff at Canada/US border points would need to be aware of Ontario's CWD ban and have an up-to-date list of US states where CWD there is a fully certified state CWD herd certification program in place for this to have any positive effect.

OFA supports the proposal that Ontario cervid farms receiving imports of live cervids meet existing regulatory requirements for biosecurity (fencing/gating) and identification (ear tags, radio-frequency identification tags) and that transit through Ontario would be subject to biosecurity, identification requirements, plus permit requirements and be sealed in transport vehicles. We do raise a cautionary note with respect to "transit through Ontario" regarding potential animal welfare concerns with the "sealed in transport vehicles" requirement.

2. Prohibiting the movement of live captive cervids between locations within Ontario while allowing for exceptions:

OFA supports the Ministry of Natural Resources and Forestry's proposed prohibition on the movement of live cervids between locations in Ontario unless the animals have lived in or were

imported into Ontario not less than five years prior, with the exception for cervids moving from an Ontario farm to an abattoir. OFA also supports the proposed requirements that farms receiving live cervids meet existing regulatory requirements for biosecurity (fencing/gating) and identification (ear tags, radio-frequency identification tags).

3. Expanding the existing prohibition on the possession and use of lures, scents and attractants made from parts of cervids:

OFA offers no comments on this specific proposal as it is outside the scope of our mandate as a farm organization.

4. Expanding the existing prohibition on importing into Ontario of high-risk parts of cervids hunted in other jurisdictions:

OFA also offers no comments on this specific proposal as it is outside the scope of our mandate as a farm organization.

OFA welcomes this opportunity to provide its agricultural perspective on ERO 019-2065 - proposal to reduce the risk of chronic wasting disease entering Ontario.

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