This submission is in response to the American Ginseng Draft Government Response Statement (December 19, 2019) to the American Ginseng Ontario Recovery Strategy (July 22, 2019). This submission is made on behalf of the Ontario Ginseng Growers Association (OGGA).

The OGGA commends the Ontario government for its commitment to preserving American Ginseng. As the organization representing producers of American Ginseng who grow, harvest and sell the root, we are firmly in support of best management practices to preserve the species. As such, the OGGA offers the following comments with the objective of providing context, nuance, and insight.

1. **Request for further research into state of species**

There seems to be uncertainty around the true state of the American Ginseng population. There are multiple references throughout the Government Response Statement to significant knowledge gaps on American Ginseng occurrences and populations (see, for example, lines 57-58, 197-202, and 270-273).

The Committee on the status of Endangered Wildlife in Canada (COSEWIC) has not re-examined American Ginseng’s “endangered” status since 2000. The species has never been assessed by the Committee on the Status of Species at Risk in Ontario (COSSARO).

The OGGA also notes that American Ginseng is not found on the International Union for Conservation of Nature’s Red List – the world's most comprehensive inventory of the global conservation status of biological species. The species is also not considered endangered by the United States of America.

The OGGA believes it to be of utmost importance that the true state of the species is known as recovery strategies, and government responses to recovery strategies, are being developed. It is this information that will guide recovery efforts. The OGGA also questions how the government will deliver on its last government-led action (“conduct a review of progress toward the protection and recovery of American Ginseng within ten years of the publication of this document”) when it does not have a full and accurate understanding of the state of the American Ginseng species today.

1. **Field-cultivated**

There are 10,000 acres of American ginseng currently under production in Ontario. Field-cultivated ginseng currently planted represents approximately 3.2 billion plants in Ontario alone. The OGGA believes these are important statistics that have been ignored in the Government Response Statement as drafted.

A decision needs to be made as to whether “field-cultivated” American ginseng is considered the same species as “wild” American ginseng. If it is the same species, the OGGA questions how American ginseng can be considered “endangered”, with 3.2 billion plants in Ontario alone. If it is not considered the same species, and the status of American ginseng is assessed based purely on “wild” populations, then the OGGA requests that a separate, sub-species classification – one which acknowledges the reality and health of the population – be established.

1. **Woods-grown and wild-simulated corrections**

At lines 153-157, the Government Response Statement reads “Allowing the harvest and sale of American Ginseng that is commercially cultivated through other production methods (e.g. woods-grown or wild-simulated) is considered to pose a conservation risk to the species in Ontario, primarily due to difficulty in distinguishing wild American Ginseng roots from American Ginseng cultivated through these other production methods.” The OGGA disagrees with this consideration. Allowing the harvest and sale of American Ginseng that is commercially cultivated through woods-grown or wild-simulated methods does not pose a conservation risk to the species in Ontario. For one, it does not negate the illegal status of selling wild American Ginseng. Secondly, a CITES permit is still required for the export of woods-grown and wild-simulated American Ginseng. Most importantly, the root grown through a woods-grown cultivation method is easily-identifiable as woods-grown, and not wild: “The woods-grown method produces an easily identified root similar to the field-cultivated root.”[[1]](#footnote-2)

At lines 157-163, the Government Response Statement reads “Additionally, if it occurs too near to wild populations, woods-grown cultivation of American Ginseng can affect wild American ginseng populations through disturbances associated with site preparation (e.g. understory clearing) and maintenance (e.g. fertilizers), an increase in levels of exposure to native pathogens and introduction of non-native pests (e.g. the invasive slugs mentioned above in hay, soil or compost) or foreign genes that potentially diminish local adaptations.” The OGGA also disagrees with this allegation. Not only do growers not use hay, the prohibition on the harvest, trade and cultivation of woods-grown and wild-simulated ginseng is based on outdated science that has been debunked. It is now known that allowing wild-simulated and woods-grown ginseng production does not threaten existing wild ginseng populations. The OGGA directs the government to Sean Westerveld’s (an OMAFRA Ginseng and Medicinal Herbs Specialist) report entitled “Diseases and Pests of Ginseng in Ontario: Potential Impacts on Wild Populations” for a complete review of this science.

1. **Benefits of woods-grown and wild-simulated**

There are many benefits to allowing the cultivation of wild-simulated and woods-grown American Ginseng. Not only would it increase production of the species, it would also deter poaching, by increasing supply and lowering value.

Lifting the prohibitions on the cultivation of American Ginseng would also help the environment more generally: allowing landowners to harvest, trade and cultivate ginseng will motivate them to keep their mature forest properties intact and amenable to ginseng. Under the current conditions of the *Endangered Species Act*, these landowners would simply rather have their properties logged and the forests destroyed.

The OGGA, like the Ontario Federation of Agriculture, believes that mimicking wild ginseng through wild-simulated or woods-grown cultivation will enhance the recovery of wild American Ginseng. The OGGA submits that a Recovery Strategy – and a Government Response to a Recovery Strategy – that omits this rehabilitation technique is, at best, incomplete, and, at worst, fatally flawed.

1. **CITES**

The OGGA respectfully suggests that the government amend lines 165-166 of the Government Response Statement to reflect the fact that American Ginseng is listed on Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora. Appendix II is reserved for species that are *not necessarily threatened with extinction*, but in which trade must be controlled in order to avoid utilization incompatible with their survival. It is disingenuous to disregard the true American Ginseng CITES’ classification in the Government Response Statement.

1. **Government-led actions**:

The OGGA is generally in agreement with the proposed list of government-led actions, particularly the action to “support partners such as the OGGA to undertake activities to protect and recover American Ginseng. Support will be provided where appropriate through funding, agreements, permits (including conditions) and/or advisory services.” The OGGA looks forward to discussing how the government envisions this support.

The OGGA remains concerned with the proposed government-led action to “continue to protect American Ginseng and its habitat through the ESA.” It is the OGGA’s position that the current listing of American Ginseng as endangered does more harm than good to the species. It stifles production and inhibits population rehabilitation by prohibiting the planting and the growth of woods-grown and wild-simulated American Ginseng. By extension, the listing of American Ginseng as endangered also encourages poaching by limiting supply.

1. **Government**-**supported actions**:

The OGGA is also generally in agreement with the proposed list of government-supported actions and offers the following comments:

* “Investigate factors that increase susceptibility to illegal harvest and test the effectiveness of mitigation approaches to reduce illegal harvest of roots”: as above, the OGGA believes that an effective way to reduce the illegal harvest of roots is to allow for increased production of woods-grown and wild-simulated American Ginseng, an act which is currently prohibited by the *Endangered Species Act*
* “Investigate potential conservation benefits and risks associated with cultivating American Ginseng in forest settings of reasons other than species recovery (e.g., woods-grown or wild-simulated)”: the OGGA is pleased to further discuss the benefits of woods-grown and/or wild-simulated American Ginseng production
* “Where appropriate, dispersing or collecting and stratifying of seed, and the planting of seeds or seedlings appropriately sourced to maintain or improve genetic health”: the OGGA has historically offered to provide seeds free of charge for the exact reason of protecting and recovering American Ginseng.

**Conclusion**: In sum, the OGGA will continue to work with the Ontario government to preserve the American Ginseng species and looks forward to collaborating with the government to produce a comprehensive action plan.

1. <https://prod-environmental-registry.s3.amazonaws.com/public_uploads/2019-03/GinsengFinal_0.pdf>, at page 3. [↑](#footnote-ref-2)