

# Canadian Herb Specialty Agriculture and Natural Health Products Coalition

Serving the specialty agriculture industry for over 28 years

May 15, 2025

## In response to the proposed interim changes to the Endangered Species Act, 2007 and a proposal for the Species Conservation Act, 2025

To Whom It May Concern,

This letter is in response to the proposed Species Conservation Act and the repeal of the Endangered Species Act

CHSNC (Canadian Herb, Specialty Agriculture and Natural Health products coalition) is the national specialty agriculture association supporting this industry from field and forest to finished product for over 20 years. We have had the pleasure of having the indigenous community and field producers and processors at the table with us from day one. We have worked with our counterparts in the USA and the EU to help address many of the pending issues. Field production and wild harvesting have traditionally been good partners, and supporting both is our priority. This proposal needs to keep in mind the importance of this as proposed changes to the current legislation move ahead. **Ginseng (*Panax quinquefolius*), a threatened species under the Endangered Species Act, is our number one example.**

Harvesting in the wild has traditionally been part of the world's practices through countless generations. Canada has been a leader in using traditional knowledge to ensure the plants harvested from the wild have been done sustainably, and (a quote from indigenous bands) has been harvested so that their great-grandchildren will always have these plants available for food, medicine, and emotional health. This tradition has helped many plants survive and have an ongoing life. For the most part, wild harvesting has been done sustainably with respect for the land. But there are exceptions. There have been instances when overharvesting, disrespectful harvesting, and harvesting with a lack of knowledge have put species at risk. Poaching is real and happening. For over 20 years, we have been working with indigenous and non-indigenous communities across Canada by training on risk management and how to manage these crops (field or wild) so they can live for many generations.

The other positive situation is that some wild plants have been moved to field production while still maintaining their bioactive status, often without the need for gene manipulation. There are good examples of this working well. We have trained the field-grown ginseng industry on risk management and are happy to see their success.

Based on our experiences, we have concerns with the proposed legislation but also see an opportunity to fix some major problems with the Endangered Species Act that have prevented species recovery, especially for ginseng.

The field ginseng industry has capacity to produce large amounts of seed to help recover the species. These plants

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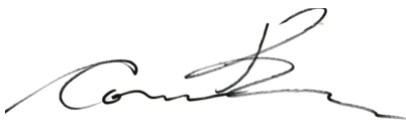
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originally came from the wild and have never been improved through breeding. However, onerous permitting processes have prevented the exploration of using this seed to help recover the species. Ideally, any new legislation has a process in place that enables permits to do any activities to help recover the species, and these permits should be easy to obtain. Unfortunately, that process is not working well, and thus permits were basically impossible to get, and no major research into species recovery or other recovery activities occurred under the Endangered Species Act for ginseng. This added more problems and was a threat to some species, like ginseng, for which poaching is the main driver of species decline.

There is also great potential for a wild-simulated ginseng industry on private wood lots as is done in Quebec and the eastern US. Unfortunately, this production system became illegal under the Endangered Species Act without a permit, and permits were never given for these activities. Quebec's formula for maintaining species like ginseng in the wild is not only long-running but very successful and should be duplicated in Ontario and across Canada. Wild simulated ginseng production can add value for preserving intact woodlots, can indirectly aid in species recovery through natural movement of seed, and can decrease market prices for wild ginseng, which can reduce poaching of truly wild plants.

The new act would greatly benefit from using this model and should allow for these activities to occur. This will add an economic incentive for habitat preservation and species recovery. However, CHSNC also recognizes that wild ginseng needs protection, and we have concerns that the new legislation will remove that protection in favour of housing or other developments. Without protection, wild ginseng could be extirpated within a few years, considering the value of wild ginseng on the market. We need to reward and support those doing due diligence and not punish them for others' neglect.

We are proud of the wild harvesting or wild farming, and also the field grown, and think with some open-minded thinking, we can even make it better. We encourage a balanced approach that protects wild species and their habitat but also encourages research and species recovery efforts through relaxed permitting requirements.



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