



March 4, 2019

Public Input Coordinator
Ministry of the Environment, Conservation and Parks
Species Conservation Policy Branch
300 Water Street, Floor 5N
Peterborough, Ontario K9J 3C7

To whom it may concern,

Re: EBR # 013-4143: 10th Year Review of Ontario's Endangered Species Act: Discussion Paper

The Beef Farmers of Ontario (BFO) appreciates the opportunity to provide comments as part of the 10th year review of the *Endangered Species Act* (ESA). BFO represents the 19,000 beef farmers across Ontario by advocating in the areas of policy planning, industry development and research, environment, animal health and welfare, and domestic and export market development.

BFO supports the principle of protecting and recovering Ontario's species at risk, and is proud of the role Ontario's beef farmers play in providing habitat for species at risk on agricultural grasslands. The continued presence of species at risk on Ontario beef farms is a testament to the preservation of natural habitats on farms, especially grasslands that take the form of pasture and forage production. Unfortunately, though agricultural grasslands provide critically important habitat for species at risk like the bobolink and eastern meadowlark, Ontario has seen drastic reductions in grasslands. Between 2006 and 2016, pasture acreage declined over 30% and hay acreage declined over 32%. This rate of disappearing grasslands is unsustainable both for species at risk and the beef industry.

Balancing species at risk protection and recovery with economically viable agricultural use on grasslands is key to sustainable beef production and effective species at risk regulation and programs. As stated on the U.S. website of the World Wildlife Federation, "Keeping ranchers in business leaves grasslands intact, creates habitat for a broad diversity of birds and other grassland species, moderates run-off, and secures carbon in the soil." These priorities must be balanced in order to maintain and enhance Ontario's existing grasslands – without the economic viability of ruminant livestock operations, grassland habitat will continue to disappear. Ontario's beef farmers are invested in protecting this habitat if provided with the tools and flexibility to do so, and BFO is wary of any changes to the ESA that would open the door to development on farmland, and grasslands in particular, too widely.

Regarding grasslands species at risk, resources should be directed to research, stewardship incentive programs, education efforts, and voluntary measures that benefit species at risk while supporting agricultural operations, in lieu of regulatory enforcement. Robust financial incentives to maintain and create grassland habitats must be made available, and should receive a similar level of financial support



to tree-planting initiatives that have been provided to ensure the health and viability of Ontario forests. BFO recommends that these financial incentives not be tied to the Environmental Farm Plan, as it does not have a clear connection or link to biodiversity or species at risk.

Further to this, BFO supports the development of a province-wide grassland habitat stewardship initiative, and believes that the Ontario government's commitment to partnership projects for public lands must include an improved process for making Crown land available for agricultural expansion in northern Ontario, which is within the bobolink's northern range and could provide a significant source of new grassland habitat if it were made available for hay and pasture production.

The majority of Ontario's grasslands are managed by ruminant livestock farmers, and provincial policies and programs must recognize the valuable role beef farmers play in maintaining and preserving these areas. However, all of society benefits from the protection of species at risk and their habitat, and therefore no single sector of society should bear the costs – which, since the inception of the ESA, have landed disproportionately on the shoulders of farmers and other rural private landowners. BFO believes that any financial costs associated with preserving endangered or threatened wildlife and their habitats should be shouldered by the public, not by the individual farmers and other rural property owners.

BFO recommends that broad oversight of regulations and policies concerning species at risk be strengthened in order to avoid contradictory actions and programs. For example, tree-planting initiatives can often work at cross-purposes to grasslands stewardship, as taking land out of pasture and hay fields for planting trees does more harm than good. Strategic oversight is required over the collection of policies and programs that aim to protect and recover species at risk, and this will require partnerships between industry and government to mitigate the risk of conflicting policies, as well as a balanced approach that does not over-incentivize one habitat program at the cost of another.

BFO supports investigation of a broader, landscape approach in the ESA that facilitates more efficient and effective species protection and recovery outcomes. Reviewing and developing recovery strategies and habitat regulations in a more holistic fashion could eliminate some contradictions and/or redundancies when dealing with habitats that support a multitude of protected species.

In addition, BFO recommends that the Committee on the Status of Species at Risk in Ontario (COSSARO) include a rural and/or agricultural perspective, as this committee has the important responsibility of listing species of plants and animals on the Species at Risk in Ontario list. There is typically insufficient public notice related to the listing of species at risk, and an open, transparent and easily accessible system would help facilitate more stakeholder engagement with COSSARO. BFO recommends that timelines for developing recovery strategies be more flexible to allow enough time for a thorough review of scientific literature and to ensure strategies are based on best available science and evidence.

The listing of the Algonquin wolf highlights some of BFO's concerns with the current process. The government's expectation that a hunting and trapping ban would expand the Algonquin wolf's current range and provide protection was unrealistic and impractical. The flawed recovery strategy, combined with the inclusion of coyotes in the hunting ban (Ontario's dominant predator on livestock), is an example of COSSARO operating in a non-transparent and non-consultative manner without proper input from rural and agricultural stakeholders. BFO recommends that any regulation regarding the protection of threatened or endangered predator species, such as the Algonquin wolf, must include adequate consultation with agriculture and allow farmers the right to protect their property from coyotes, wolves and other predators.



Ontario's process of identifying species at risk would benefit from increased transparency, and it would be helpful to publish an up-to-date list that indicates population numbers and range for each species (as is currently done with birds). This could raise awareness of population declines, and potentially lead to proactive implementation of protection strategies before species are classified as at risk.

Beef Farmers of Ontario looks forward to further discussions and consultations on the *Endangered Species Act*, and we thank the Ministry of the Environment, Conservation and Parks for the opportunity to provide comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Hill". The signature is stylized and cursive.

Joe Hill
President

cc: BFO Board of Directors

