



May 23, 2014

Michelle Collins, Policy Analyst
Ministry of Natural Resources
Policy Division
300 Water Street
Floor 2, Robinson Place South Tower
Peterborough, K9J 8M5

Dear Ms. Collins,

Re: Environmental Registry: 012-1597

The Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on the Ministry's development of a government response statement for Bobolink and Eastern Meadowlark under the *Endangered Species Act, 2007*.

The Ministry has identified four key questions to help facilitate input on the Round Table Report. BFO offers initial comments on these four questions below:

1) Do you support the exemption solutions package proposed in the report, which would include extending the agricultural exemption until 2024 as well as stewardship incentives for landowners, research and monitoring, and education and outreach?

BFO fully supports the solutions package proposed in *the Bobolink/Eastern Meadowlark Round Table Report*, October 2013. We have previously stated that resources should be directed to stewardship incentive programs, education efforts and voluntary measures that benefit Bobolink and Eastern Meadowlark populations while supporting agricultural operations in lieu of regulatory enforcement. We believe the solutions package that has been proposed by the Round Table adequately captures this desired direction.

BFO is currently working on an industry strategy that we feel will assist the recovery of grassland birds as well as support the sustainability and growth of the Ontario livestock sector. These initiatives, *outlined in our response to question 4*, extend beyond the more focused conservation strategies contained in the Round Table Report and BFO encourages the Ministry to incorporate them into the recovery strategy.

2) Are there any components of the solutions package that are more or less important than others?

It must be acknowledged that farmers play a critical role in the creation and management of hayfields and pastures, the very lands that provide the majority of suitable habitat for Bobolink and Eastern Meadowlark. As a result, a long-term exemption for agricultural operations should be viewed as the most important component of the solutions package. Without this component we risk disenfranchising the entire agricultural community and eliminating any hope of cultivating support from farmers to implement protection and recovery measures that benefit grassland birds.

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3) How can all landowners be encouraged to take part in recovery?

To encourage recovery initiatives, robust financial incentives to maintain and create grassland habitats must be made available. Grassland enhancement and restoration incentives could enable both farmers and rural non-farm landowners to participate in recovery activities that benefit Bobolink and Eastern Meadowlark. Incentives should be directed to the maintenance/creation/enhancement of grassland ecosystems rather than species-specific programs. This would likely receive more interest from landowners than a “save the Bobolink” program.

The MNR must also reassess the policy ‘carrots’ that have been provided to ensure the health and viability of Ontario forests. Landowners have received significant financial incentives to support tree planting initiatives, often at the expense of lands that could have been converted or kept as grasslands, yet little has been done to support grassland creation or conservation projects. Grassland, hay and pasture creation/maintenance/enhancement programs should receive a similar level of financial support. Moving forward, a balanced approach must be taken that does not over-incentivize one habitat program at the cost of another.

4) What existing or new strategies and plans could be harnessed to conserve suitable grassland, hay, and pasture habitat in Ontario?

The ‘Save the Farmer, Save the Bird’ approach could be used to help support the maintenance and conservation of grassland, hay and pasture habitat in Ontario. Since 2003 Ontario’s beef cow herd has declined by close to 20% which parallels the decline of Bobolink and Eastern Meadowlark populations over the last decade. BFO is currently working on a beef expansion strategy focused on creating a viable production model that would help increase the number of cows in the province by utilizing affordable, marginal lands in northern and eastern Ontario. With more production comes an increase in managed grasslands and suitable Bobolink and Eastern Meadowlark habitat.

In order to create, maintain and expand pasture and grassland acreage farmers must have access to policy supports that provide sustainability and reduce the risk of entering or expanding a livestock operation. Without robust supports such as grants for land clearing and habitat maintenance, capital loan programs that allow new entrants and expanding operations to buy land and equipment, and increased funding for the Ontario Risk Management Program (RMP), a further erosion of grassland habitat will occur as the number of operations in the province continues to decline.

A strategy that encourages growth and sustainability in the livestock sector not only complements the Province’s jobs plan and the Premier’s growth challenge for the Agri-Food sector, it also supports the maintenance and creation of habitat critical for grassland birds. Supporting farmers by providing access to programs that provide sustainability for livestock operations will have a far greater impact on conservation efforts and in the creation and maintenance of grassland habitat than regulatory controls.

On behalf of the Beef Farmers of Ontario (BFO), we thank you for the opportunity to comment on this policy proposal and welcome the opportunity to meet with you to further discuss the comments contained in this submission.

Sincerely,



Bob Gordanier
President

