

Public Input Coordinator
Ministry of the Environment, Conservation and Parks
Species at Risk Branch
300 Water Street
5th Floor, North tower
Peterborough, ON K9J 8M5

November 5, 2021

RE: ERO 019-4280 Amendments to Ontario Regulation 242/08 (General Regulation – *Endangered Species Act, 2007*) relating to upcoming changes to the Species at Risk in Ontario List

Dear Public Input Coordinator,

The National Farmers Union – Ontario (NFU-O) is an accredited farm organization representing thousands of sustainable family farmers in Ontario and has advocated for farm families across Ontario and Canada since 1969. Members work together to achieve agricultural policies that ensure dignity and income security for farm families, while protecting and enhancing rural environments for future generations. The NFU-O collaborates locally, nationally and internationally to research, educate, and share effective solutions that lead to a better world for farm families and their communities.

The NFU-O appreciates the opportunity being given to comment on the **Amendments to Ontario Regulation 242/08 (General Regulation – *Endangered Species Act, 2007*) relating to upcoming changes to the Species at Risk in Ontario List.**

Biological Diversity

Members of the NFU-O are deeply concerned about our changing climate and how it impacts our ability as farmers to continue to produce food. We understand that on-farm biodiversity is a critical part of the solution, and we are committed as an organization to working towards the protection of on-farm biodiversity through our policy on Sustainable Agriculture.

However, decisions made in the public realm have a direct impact on the economic, social, and environmental sustainability of farms. Sustainable farming relies on strong policies to ensure the protection of biological diversity- wetlands, forests, and species at risk- across Ontario.

According to the International Convention on Biological Diversity, to which Canada is a party, the Earth's biological resources are vital to humanity's economic and social development - biological diversity is a global asset of inestimable value to present and future generations. The Earth's biodiversity is the foundation of ecosystem services essential to sustain agriculture and human well being. Biodiversity plays a major role in mitigating climate change by contributing to long-term sequestration of carbon in a number of biomes (naturally occurring

communities of flora and fauna occupying major habitats such as forests and grasslands). Biodiversity loss is ranked as a top five risk to economies over the next decade.

Biological Diversity vs Reduction of Burden

The current proposal would allow the use of existing conditional exemptions for select newly-listed species that will be added to the *Species at Risk in Ontario List regulation*. It is intended “to reduce burden as individuals conducting activities that meet the eligibility requirements would not need to obtain an ESA permit or agreement as long as they follow the conditions set out in the regulation”. As well the proposed changes are meant to “increase the predictability of regulatory requirements, enabling cost and time savings to individuals, businesses, and the government.”

The suggested options are inconsistent with the purpose of the *Endangered Species Act, 2007* which is to protect and recover species at risk. Protection and recovery must be the priority, not cost and time savings to individuals, businesses, and government.

This is part of an alarming trend of prioritizing efficiency and business interests over environmental protections that first manifested as changes to the *Endangered Species Act, 2007* in Bill 108. The Government of Ontario drastically overhauled Ontario’s *Endangered Species Act, 2007* through changes in Schedule 5 of Bill 108, an omnibus bill that passed on June 6, 2019. The amendments gave new powers to the Minister to delay, limit and remove protections for at-risk species.

To delay, limit and remove protections for at-risk species and their habitats does not uphold the intent of the *Endangered Species Act, 2007*.

The NFU-O recommends that the Ministry instead invest in and incentivize stewardship of biodiverse ecosystems, including habitats for species at risk, to help mitigate the effects of climate change, to support the sustainable production of food, and to support the health and well being of our communities.

Thank you again for the opportunity to provide comments on **Amendments to Ontario Regulation 242/08 (General Regulation – *Endangered Species Act, 2007*) relating to upcoming changes to the Species at Risk in Ontario List.**

Sincerely,



Don Ciparis
President, National Farmers Union - Ontario