

November 1, 2023

Leanne Jennings
Ministry of Environment, Conservation and Parks
Species at Risk Branch- Species at Risk
Recovery Section
300 Water Street
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Peterborough, ON
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Sent via email to leanne.jennings@ontario.ca and submitted online through the Environmental Registry of Ontario

Dear Leanne Jennings,

RE: ERO 019-6690: Developing the government response statement for Black Ash under the Endangered Species Act, 2007

On behalf of the Ontario Federation of Agriculture (OFA), thank you for the opportunity to participate in the process of developing a government response statement Black Ash under the *Endangered Species Act, 2007*. Our topline feedback is summarized below:

- **Ontario's Landscape:** OFA believes that recovery strategies and habitat regulations need to reflect that it is unsustainable to have a single-minded focus on species restoration that excludes all other factors.
- **Short- and Long-Term Goals:** OFA supports the proposed short- and long-term goals in the draft government response statement for Black Ash.
- **Focus of Black Ash Recovery:** OFA recommends that the focus of Black Ash recovery should be directed on identifying and developing trees resistant to Emerald Ash Borer, archiving and preserving genetic material, and investing in effective ways to manage Emerald Ash Borer.
- **Data:** OFA suggests improving data collection for Black Ash in more rural and northern areas of the province.
- **Economic Impact Analysis:** OFA recommends conducting an economic impact analysis on the effects of recovery actions on northern Ontario, especially where data gaps currently exist.

OFA is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. We are passionate and dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with for any new or changing legislation that would impact the sustainability and growth of our farm businesses.

Ontario's agri-food sector is an economic powerhouse – producing more than 200 farm and food products, fuelling rural communities, generating nearly 750,000 jobs and contributing more than \$47 billion to Ontario's annual GDP. The province's agri-food strategy, Grow Ontario, aims to strengthen the agri-food sector, support economic growth and ensure an efficient, reliable and responsible food supply. By removing barriers, unnecessary costs and red tape, Ontario farmers will be positioned to seize opportunities and rise to the challenge of an ambitious growth strategy, allowing the agri-food sector to continue to drive the economy forward.

The natural environment supports diverse ecosystems and thrives on biodiversity. OFA acknowledges the important role that Ontario farmers serve in protecting and enhancing the natural environment and our most vital resources, and supports measures which protect species at risk while maintaining economic, social, and cultural uses.

OFA would like to restate its longstanding perspective that there is only one Ontario landscape, meaning that the full range of landforms and land uses found across Ontario; urban, rural, agricultural, natural heritage, wildlife habitats, cultural heritage, aggregate extraction, etc. must share this one landscape. Inherent in this is the recognition that our agricultural areas not only provide us with food, fibre and fuel, but also a broad range of environmental and ecological goods and services that benefit all Ontarians, including habitat for endangered and threatened species. Recovery strategies, government response statements and habitat regulations need to reflect the reality that a single-minded focus on species restoration to the exclusion of all other factors is unsustainable.

The *Endangered Species Act* was designed to identify species at risk, protect their habitats and promote stewardship practices that will help protect these plant and animal species. Ontario agriculture is no stranger to this legislation as many habitats of endangered, threatened or species of special concern are found on or around farmland.

For many Ontario farmers, it is an everyday reality that the habitats of many endangered, threatened, and special concern species are on and around their farms. From our perspective, the presence of listed species on and around farms should be applauded as a testament to the suitability of agricultural land as habitat for many endangered, threatened, and special concern species. However, some may view everyday agricultural activities as a threat and argue for onerous species and habitat protection provisions, provisions which would severely constrain the ability of farmers to continue to produce safe, affordable, local food. Farmers are not compensated for the broad range of environmental and ecological goods and services they provide to Ontarians. The presence of listed species on and around farms should be acknowledged as a societal benefit, and any consequences and costs should be borne by all Ontarians. OFA believes that any financial costs associated with achieving the goal of preserving endangered wildlife and their habitats should be shouldered by the public, not by the individual farmers and other rural property owners.

OFA supports the proposed short- and long-term goals in the draft government response statement under the *Endangered Species Act, 2007* for Black Ash. It is important that policy and regulatory tools are implemented that consider the best way to protect and recover Black Ash and manage Emerald Ash Borer (EAB) while considering the social and economic realities of Ontarians.

OFA suggests that the focus of Black Ash recovery should be directed on EAB. Identifying and developing resistant trees, archiving and preserving genetic material, and investing in the development of effective ways to manage EAB should be a priority, especially in areas currently susceptible to the threat of EAB. Archiving and preserving genetic material will help the future restoration of Black Ash populations once mitigation efforts for EAB and other threats have progressed.

However, OFA suggests that increasing knowledge and improving our understanding of Black Ash and ways to mitigate threats should also be a priority. Data gaps exist in the current location and abundance of Black Ash trees in more rural and northern regions of the province. Improving data collection in these areas and continuing to monitor known populations of Black Ash will support effective implementation of recovery actions in the future.

OFA recommends that an economic impact analysis be conducted on the effects of recovery actions on Northern Ontario, especially where data gaps exist on the location and health of Black Ash trees.

OFA appreciates the opportunity to provide our feedback and agricultural perspectives on the proposed government response statement for Black Ash. The habitats of many species at risk are located on and around Ontario farms. Species and habitat provisions may severely constrain the ability of farmers to continue to produce safe, affordable, and local food. Ontario's agricultural lands are a finite and shrinking resource, which is relied upon for the ability to produce food, fibre and fuel. Ontario farmers support the principle of protecting and recovering Ontario's species at risk, but not to the detriment of farmers and agricultural lands. We trust that our perspectives and recommendations be included the finalized Government Response Statement.

Sincerely,



Peggy Brekveld
President

cc: Hon. Lisa Thompson, Minister, Ontario Ministry of Agriculture, Food and Rural Affairs
OFA Board of Directors