

OntarioSheep FARMERS

March 4, 2019

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

To Whom It May Concern:

RE: EBR 013-4143: 10-year review of Ontario's Endangered Species Act.

On behalf of the Ontario Sheep Farmers (OSF), thank you for the opportunity to provide comments on the above-mentioned regulatory amendment.

The OSF is a producer-run organization representing the province's 3,000 sheep farmers who contribute over \$465 million into Ontario's economy. In addition to market development and promotion of Ontario lamb and wool, OSF's key strategic objectives include advocacy, and industry and organizational capacity.

Ontario's sheep farmers, as environmental stewards, are strong supporters of protecting wildlife habitat and biodiversity on their farms. With this in mind, we want to stress the importance of keeping agricultural grasslands in production as it provides necessary habitat for wildlife. This will require the industry working with government to mitigate the risk of implementing conflicting policies that work against this objective.

We believe that sheep farmers are part of the solution when it comes to Species at Risk (SAR) and, given this, could be brought into the process of identifying SARs and recovery strategy development process earlier. **It is recommended that the process of identifying species at risk be more transparent** and that a list of species be published that indicates where each animal is in terms of population numbers (as is currently done with birds). This could raise awareness of population declines, and potentially proactively implement habitat protection strategies before animals are classified as SAR.



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In relation to recovery strategies themselves, we **recommend that they be developed through a holistic lens**, that includes the impact of the strategy on other species in the area and that the economic impact of the strategy be considered during the development process, rather than afterwards as is currently done. We also **recommend that the timeline for developing the recovery strategy** be more flexible to allow enough time for a thorough review of the scientific literature and ensure the strategy developed is evidence-based.

The entire process, from identifying animals as threatened right through to the recovery strategy development process should be more inclusive. For example, bringing in private land owners who could provide a real-time perspective on the process. We strongly believe that this would lead to better outcomes and help create a collaborative environment with more realistic and sustainable outcomes.

Ontario farmers manage just under 5 million hectares of privately- owned land (Ag Census 2016). Given that forty percent of that land being hay, pasture, summer fallow, Christmas trees, woodland, and wetlands, farms and farmland offer enormous potential for species at risk conservation. Therefore, we **recommend that the government work with farmers to develop a strategy allowing for farmers to get recognition for habitat management and preservation.**

Thank you again for the opportunity to provide comment on these proposed regulatory changes. Should you have any questions and/or comments, please do not hesitate to contact me.

Sincerely,



Marc Carere
Chair

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