



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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October 19, 2015

Ms. Fiona McGuiness  
Senior Policy Advisor  
Ministry of Natural Resources and Forestry  
300 Water Street  
Peterborough, ON  
K9J 8M5

Dear Ms. McGuiness;

**RE: EBR Registry 012-1597; Development of the government response statement for Bobolink and Eastern Meadowlark under the Endangered Species Act, 2007**

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 36,000 family farm businesses across Ontario. These farm businesses form the backbone of our robust food system and rural communities with the potential to drive the Ontario economy forward.

The OFA welcomes this opportunity to present its perspective on the development of the Government Response Statement for Bobolink and Eastern Meadowlark under the Endangered Species Act, 2007.

Towards the bottom of page 2, we find the following statement; *"in addition, cattle grazing and earlier hay cuts results in loss of birds and nests, as the May to July nesting season for these species overlaps with these agricultural activities."* Firstly, livestock grazing and cutting hay have been core agricultural activities for the past 200 years, since European settlement. Little has changed except for a widespread decline in the number of farms grazing livestock and cutting hay. What was once a universal farm activity has become one limited to livestock-oriented farms.

Secondly, not enough information and context has been provided on the declining numbers of cattle, which in turn has impacted the need for farmers to maintain a portion of their land as pasture. With declining cattle numbers, there is less and less need to grass pastures. To remain in business, farmers must earn a profit from their activities. Fields that once served as pasture for cattle are converted into other agricultural uses, such as row crop production.

In addition, the draft government response statement fails to distinguish between hay (a combination of grasses) and alfalfa, a high-protein forage crop favoured by dairy farmers, and one eschewed by bobolink and eastern meadowlark. Readers of this draft would have benefitted from the inclusion of this information.

Beginning on page 5, the draft government response statement speaks to the development of a province-wide grassland bird stewardship initiative. The OFA agrees in principle with this. From OFA's perspective, a province-wide grassland bird stewardship initiative should focus its efforts primarily on non-agricultural lands. A range of park lands; provincial, municipal and conservation authority-owned properties should serve as the basis for this aspect.

In addition to a range of park lands, a grassland stewardship could also investigate habitat opportunities on pipeline rights-of-way outside agricultural areas, as well as road and highway rights-of-way, portions of industrial sites and portions of institutional properties. Lastly, some marginal lands, formerly used for agriculture, could be repurposed as grassland habitat.

Regardless of the source of land for grassland habitat, any program promoting grassland stewardship must include the ongoing maintenance of these lands necessary to keep them as grasslands; preventing transition into forests or scrub lands. Ensuring the trees and shrubs do not become established is vital, as bobolink and eastern meadowlark avoid grasslands with any trees or shrubs.

Any effort to establish grasslands on agricultural land where there is no agronomic need for pasture lands is counterproductive. Ontario's agricultural lands are a finite and declining resource, one best utilized to provide food, fibre and fuel. Between 2006 and 2011, Ontario lost over 630,000 acres of agricultural land; approximately 350 acres per day – the equivalent of 173 CFL football fields of land lost to food production every day.

The last sentence on page 5 reads, *'The grasslands stewardship initiative will also contribute to the preservation of biologically diverse and economically vibrant agricultural and rural communities.'* The later portion of the sentence makes no sense.

#### Stewardship & Awareness Action (page 7-8):

Actions 1 and 2 propose a grasslands stewardship initiative to create, enhance and maintain 30,000 ha (~74,000 acres) of grassland habitat over the next 20 years and *"the promotion of the economic and environmental benefits of grasslands in improving the long-term health and productivity of rural and farm lands due to better soil conditions, erosion control, carbon sequestration, and habitat for wildlife, particularly for grassland birds and pollinators."*

If grasslands serve no farm business function, i.e. the farm has no livestock that utilize pasture, then farmers will not set aside any portion of their productive lands for this purpose. We have seen a significant decline in beef and dairy cattle numbers since 1996. Overall cattle numbers have declined by approximately 25% despite a 19% increase in Ontario's overall population, reflecting changes in dietary preferences or the viability of cattle production in Ontario.

We take exception to the statement, *"the promotion of the economic and environmental benefits of grasslands in improving the long-term health and productivity of rural and farm lands due to better soil conditions, erosion control, carbon sequestration, and habitat for wildlife, particularly for grassland birds and pollinators."* While grasslands do provide the noted environmental benefits, productive agricultural lands provide the same environmental benefits too, with the added benefit of providing food. It is misleading to suggest that only grasslands have environmental benefits.

#### Habitat Protection & Management (page 8-9):

The OFA supports actions 6 through 9 in the draft Government Response Statement. With respect to Action 8, “*Provide policy direction to support safe harbours for Bobolink and Eastern Meadowlark*”, the OFA believes that to make safe harbours effective, it is critical that the Ministry of Natural Resources and Forestry commit to publicizing safe harbour agreements to agricultural, rural and recreational property owners. Included in this should be clear statements on the spillover onto neighbouring properties of created safe harbour habitat as well as the use of safe harbour habitat by other species. Both outcomes must not jeopardize the option to remove safe harbour habitat at the end of a predetermined time.

Research & Monitoring (page 9-10):

Actions 15 through 19 propose a suite of actions related to Research and Monitoring, including the success of grassland stewardship and the effects of the extension of the 10-year agricultural exemption. OFA welcomes these initiatives. They will guide long-term recovery of Bobolink and Eastern Meadowlark.

The OFA trusts that its perspective on the draft Government Response Statement for Bobolink and Eastern Meadowlark will be reflected in the Response Statement’s final form.

Sincerely,



Don McCabe  
President

DM/pj

cc: The Honourable Bill Mauro, Minister of Natural Resources and Forestry  
The Honourable Jeff Leal, Minister of Agriculture, Food and Rural Affairs  
OFA Board of Directors