

January 6, 2020

Ms. Fiona McGuiness
Senior Policy Advisor
Species at Risk Branch
Ministry of the Environment, Conservation and Parks
300 Water Street, 5N
Peterborough, Ontario
K9J 8M5

Sent via email: Recovery.planning@ontario.ca & fiona.mcguiness@ontario.ca

Dear Ms. McGuiness;

RE: Environmental Registry of Ontario posting 019-0742 Requesting additional scientific information to be considered in the development of the recovery strategy for one species at risk (Yellow-breasted Chat)

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

Ontario's agricultural and agri-food sector is among the most diverse agriculture sectors in North America. Well over 200 different agricultural commodities are grown and raised here; more than any other Canadian province and most US states.

We further note that the area of Ontario dedicated to the production of food has steadily declined. Based on the 2016 Census, only about 5% of Ontario's land area is capable of supporting agricultural production. Comparing the 2011 and 2016 Censuses showed a decline in the area of farms, equal to a loss of 175 acres per day! OFA firmly believes that ongoing losses of this magnitude are unsustainable.

OFA is troubled by the language in the Ministry's Yellow-breasted Chat webpage (<https://www.ontario.ca/page/yellow-breasted-chat>) versus that in the Draft Recovery Strategy for the Yellow-breasted Chat. The webpage identifies one threat, "the Yellow-breasted Chat's preferred habitat of overgrown clearings is disappearing as farmland become more intensively managed". Contrast this with the Draft Recovery Strategy which identifies five different threats: residential and commercial development; agriculture and aquaculture; natural system modifications; invasive and other problematic species; and climate change and severe weather. Of these five, agriculture's impact is deemed to be "low", while natural system modifications are

considered to have a “high-medium impact” and the impacts of invasive and other problematic species and climate change and severe weather are categorized as “unknown”! Why pick out and emphasize a “low” impact and ignore more substantive as well as unknown impacts?

The Draft Recovery Strategy acknowledges that the Chat is found in the “most intensively cultivated” area of southwestern Ontario, and that over the last 80 years, “large areas of hayfield and pasture in Ontario have been converted from forage crops to row crops (e.g. wheat, corn and soybean). This reflects changes to agriculture, not only in southwestern Ontario but broadly across Ontario, Canada and beyond.

OFA acknowledges that changing agricultural activities and the shift away from large areas on farms dedicated to hayfields and pastures has lessened that available habitat for the Yellow-breasted Chat. What we strenuously object to in your Ministry’s webpage is the singular naming of agricultural activities as the apparent sole threat, to the exclusion of more significant threats. OFA demands that the webpage section, “What threatens it” be rewritten to include all five threats cited in the Draft Recovery Strategy.

Sincerely,



Keith Currie
President

cc: The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors