

December 17, 2020

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To Whom It May Concern;

RE: Recovery Strategy and Action Plan for the Fawnsfoot and Threehorn Wartyback in Canada

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

The Fawnsfoot and Threehorn Wartyback are freshwater mussels, listed as Endangered and Threatened respectively under the *Species at Risk Act* (SARA) in August 2019. Both mussel species are restricted to southern Ontario in the Great Lakes watershed. The proposed Recovery Strategy and Action Plan lists the main threats facing both species as:

- The presence of invasive species,
- Turbidity, sediment and nutrient loading,
- Contaminants and toxic substances,
- Habitat removal/alteration,
- Altered flow regimes,
- Predation and harvesting,
- Declines in host fish availability, and
- Recreational activities.

The proposed Recovery Strategy and Action Plan report states that the above pollutants are related to both urban and agricultural activities, and represent a high and continuing threat to these species at remaining Ontario riverine locations. Water, soil, and air are the primary building

blocks of the farming industry. OFA believes the proposed Recovery Study and Action Plan is very harsh on Ontario's agricultural community and does not acknowledge the significant investment by farmers in environmental stewardship initiatives which provide positive long-term benefits to our water, soil, and air quality. 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. We acknowledge that actions need to be taken to minimize impacts on species at risk and their habitats, however 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. Based on data from the 2011 and 2016 censuses, total Ontario farm area declined dramatically by almost 320,000 acres. Maintaining our agricultural lands to produce food, fibre and fuel is critical. OFA would like to provide the following comments on the proposed Recovery Strategy pollutants, as they relate to agriculture:

Turbidity and Sediment Loading

Under the turbidity and sediment loading section, the proposed Recovery Strategy states "increased agricultural land use, which can include clearing of riparian vegetation and unrestricted access to the river by livestock, is often associated with increased sediment loads". The Recovery Strategy fails to acknowledge the clearing of riparian zones through urbanization and industrialization, only citing agriculture as a major threat. Prime agricultural land is a shrinking resource; To provide a more accurate depiction of the issue of riparian zone clearing, OFA believes that the amount of farmland being absorbed for urban and industrial uses needs to be considered in future documents. The agricultural industry recognizes that healthy riparian areas serve many functions, including protecting water quality. Ontario farmers continue to develop and implement Best Management Practices (BMPs) to help restore and ensure sustainability of water quality and quantity. BMPs such as cover crops, riparian zone buffers, reduced, minimal or no tillage operations, alternative grazing management systems, etc. are used by farmers to decrease turbidity and sediment loading in Ontario waters. Agriculture depends on a reliable supply of good quality water. Practices to protect water quality and soil conservation are critical in maintaining a sustainable agricultural sector.

Contaminants and Toxic Substances

The proposed Recovery Strategy states that "watersheds (Grand, Sydenham, and Thames) in southern Ontario are largely surrounded by agricultural land where activities such as the clearing of riparian zones, the use of fertilizers and pesticides, and the presence of ammonia from tile drainage, wastewater drains, as well as manure storage and spreading have all contributed to poor water quality". OFA would like to reiterate that farmers are stewards of the environment, and that riparian zones are also increasingly threatened by major urban and industrial factors.

Currently, multiple pieces of legislation and regulations exist for agricultural operations in Ontario to protect and conserve the natural environment. These include, but are not limited to the *Environmental Protection Act*, *Nutrient Management Act*, *Pesticides Act*, *Safe Water Drinking Act*, *Ontario Water Resources Act*, and corresponding regulations. Any farm practice involving the management of water, nutrients, land use, construction or other environmentally related activity raises certain legal obligations for the person undertaking that farm practice. The purchase and use of pesticides and herbicides is highly regulated in Ontario. Farmers must be certified and licensed to purchase and apply pesticides and herbicides, and must do so in accordance with label directions, which include specifications on mixing, application rate and weather conditions. Farmers also work hard to protect their crops using Integrated Pest Management, which focuses on preventing pest or insect problems. Nutrient management BMPs are implemented by Ontario farmers to promote the efficient use of fertilizer and reduce nutrient loss, and reduce the impact on watersheds. The 4R Nutrient Stewardship Program encourages “Right source, Right rate, Right time, and Right Place” to ensure that fertilizers and other nutrient sources are managed sustainably.

Nutrient Loading

Under the nutrient loading section of the proposed Recovery Strategy, it states that “Nutrient loading can result from sources including: manure seepage; agricultural runoff; municipal wastewater and sewage discharge; and, riparian clearing and the use of tile drainage practices, which can allow nutrients to infiltrate watersheds more easily”. The management, land application, and storage of agricultural source materials and non-agricultural source materials that are applied to agricultural lands as a nutrient are regulated under the *Nutrient Management Act*, and O. Reg 267. BMPs are used to minimize the impact of agricultural activities associated with nutrient on water resources while maintaining productivity. Producers across the province employ a number of BMPs to manage manure, agricultural runoff, etc., to protect land and water resources. OFA continues to work with groups across the province to evaluate agronomic practices to reduce nutrient loss. Ontario farmers are already implementing BMPs, 4R Nutrient Stewardship principles, growing cover crops and timing nutrient applications to reduce phosphorus loads in watersheds, improve agricultural practices, and preserve the health of our lands and waters.

Recovery Measure 21

The proposed Recovery Strategy Recovery Measure 21 states “as Fawnsfoot and Threehorn Wartyback populations are found within the lower portions of the Grand, Sydenham, and Thames river watersheds, it is important to focus stewardship activities within these areas. However, threats including nutrient loading and sedimentation can accumulate from upstream reaches; therefore, the application of BMPs within the upper sections of a watershed may also prove beneficial for Fawnsfoot and Threehorn Wartyback populations”. Farmers practice BMPs across the entire province, not just specific areas of Ontario. Certain plans, projects, and groups such as the Thames River Phosphorus Reduction Collaborative target site-specific problems, to protect and preserve provincial watersheds.

Considerable progress has been made in recent years to preserve and protect Ontario watersheds with respect to agricultural operations and businesses. Ensuring sustainable food, fibre and fuel is a priority for Ontario's agricultural industry. Sustainable farming requires healthy soils, waters, airways and environments. The proposed Recovery Strategy for Fawnsfoot and Threehorn Wartyback does not recognize the continued development and use of best management practices and other steps being taken by the agriculture industry to preserve and protect our water, land and air. Protecting and maintaining water quality is critical for sustainable agriculture. Farmers should be recognized for their role and accomplishments in environmental stewardship which provide positive long-term benefits to our water, soil, and air quality. OFA appreciates this opportunity to provide its perspectives on the proposed Recovery Strategy and Action Plan for the Fawnsfoot and Threehorn Wartyback in Canada. Ontario farmers continue to strive to protect and enhance our natural resources and welcome future conversations to move forward and be part of the solution.

Sincerely,



Peggy Brekveld
President

cc: Mary Robinson, President, Canadian Federation of Agriculture
OFA Board of Directors