

January 4, 2022

Adam Byers
Species at Risk Recovery Unit
Ministry of Environment, Conservation and Parks
135 St Clair Ave W,
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Sent via email to: recovery.plannin@ontario.ca
and submitted online via the Environmental Registry of Ontario (ERO)

To Whom It May Concern,

Re: ERO #019-4553: Requesting additional scientific information to be considered in preparing the recovery strategy for Spoon-leaved Moss

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across the province, supporting our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. OFA works to ensure the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability of our farm businesses. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA appreciates this opportunity to comment on ERO #019-4553: Requesting additional scientific information to be considered in preparing the recovery strategy for Spoon-leaved Moss. Before addressing the proposed recovery strategy, 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.

The context for OFA's landscape perspective is based on Ontario's ever-shrinking supply of agricultural land. Based on data from the 2011 and 2016 censuses, the total area of Ontario farms declined dramatically by almost 320,000 acres: from 12.6 million acres to 12.3 million acres or 175 acres per day. Maintaining our agricultural lands to produce food, fibre and fuel is critical.

OFA supports the proposed recovery goal and the proposed actions to support research, monitoring, and addressing key knowledge gaps for Spoon-leaved Moss. However, OFA would like to highlight that much of the proposed recovery strategy is based upon inference, and that scientific knowledge on the biology or ecology of Spoon-leaved Moss, or the reasons for its rarity is limited. Line 101 and 102 of the Draft Recovery Strategy for Spoon-leaved Moss states “all identified threats to this species are somewhat speculative as there is limited direct evidence that any have resulted in loss or impact to known colonies”. Under 1.6: Threats to survival and recovery, lines 537-540 directly implicate agricultural activities (conversion of natural lands to cultivated fields, tillage, and wind erosion resulting from tilled fields) as causing habitat loss, degradation, and incidental mortality. The Committee on the Status of Endangered Wildlife in Canada (COSEWIC) assessment and status report on Spoon-leaved Moss in 2017 list agriculture’s threat impact as “unknown”. OFA believes this section of the proposed Recovery Strategy paints Ontario agriculture in a poor light, and unfairly places blame on agricultural activities for the decline in Spoon-leaved Moss colonies in the province. OFA requests this section be revised to accurately reflect that more information is needed to determine the effects agricultural activities have on Spoon-leaved Moss colonies in Ontario.

OFA appreciates that the proposed Recovery Strategy acknowledges the role agriculture may play in the recovery of the species. Lines 543-547 under 1.6: Threats to survival and recovery notes that agricultural machinery and equipment may help spread Spoon-leaved Moss in Southern Ontario through fragment dispersal. Farmers need to be recognized for their role and accomplishments in environmental stewardship which provide long-term benefits to our water, soil, and air quality.

OFA supports that the proposed Recovery Strategy emphasizes monitoring, management, research, and promoting awareness of the species. However, we are concerned that areas being considered in developing a habitat management plan and future habitat regulations for Spoon-leaved Moss may potentially limit agricultural activities. The proposed Recovery Strategy lists the main habitat types for Spoon-leaved Moss as “deciduous forests, treed swamps, plantations, thickets, savannahs and meadows”, and that known subpopulations in Ontario “appear to favour imperfectly drained, partially shaded, second-growth wooded areas”. The majority of farmland would be excluded from these habitat types. However, the draft Recovery Strategy uses an Ecosite approach for the development of habitat regulation, which encompasses the Ecosite in which Spoon-leaved Moss occurs, and a minimum 50-meter radius surrounding the outer limit of a Spoon-leaved Moss colony. As farmland may occur adjacent to habitat types favoured by this species, the proposed 50-meter radius surrounding the outer limit of the colony may inadvertently capture boundary Ecosites where agricultural activities occur, for example where a forest or thicket abuts a tilled agricultural field. OFA recommends that future habitat management plans and habitat regulations exclude boundary Ecosites where agricultural activities occur, and do not impede normal farm practices.

OFA would like to restate that Ontario’s agricultural lands are a declining resource. Land capable of supporting agricultural activities is a finite, strategic, non-renewable resource, relied upon for its ability to produce food, fibre and fuel for Ontarians, Canadians, and beyond. 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. Ontario farmers support the principle of protecting and recovering Ontario’s species at risk, but not to the detriment of farmers and agricultural lands.

OFA appreciates this opportunity to comment on ERO #019-4553: Requesting additional scientific information to be considered in preparing the recovery strategy for Spoon-leaved Moss.

Sincerely,



Peggy Brekveld
President

cc: The Honourable David Piccini, Minister of the Environment, Conservation and Parks
The Honourable Lisa Thompson, Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors