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Sent via email to: sandra.johnson2@ontario.ca

Dear Sandra Johnson:

RE: ERO 019-6701: Ontario Biodiversity Council is renewing its Ontario's Biodiversity Strategy and is seeking public input

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.

Agriculture plays a fundamental role in everyone's life- from the food we eat to the products we buy. It provides the food on our table, raw materials for goods such as clothing, shelter, and fuel, and provides income and livelihoods for many individuals and families. At the base of it all, is biodiversity. OFA is a proud member of the Ontario Biodiversity Council, and is pleased to have this opportunity to provide our agricultural perspective on **ERO #019-6701: Ontario Biodiversity Council is renewing its Ontario's Biodiversity Strategy and is seeking public input.**

Section 4: Vision, Mission and Goals

Vision

A future where biodiversity loss is halted, recovery is advanced, and people are living in harmony with nature. People value, protect and enhance biodiversity and the ecosystem services essential for sustaining a healthy planet and delivering benefits essential for human health, well-being and prosperity.

OFA strongly agrees with Ontario's Biodiversity Strategy (OBS)'s vision statement. Agriculture plays a critical role in preserving and promoting biodiversity, but biodiversity is also fundamental

to a healthy and sustainable environment, and to a sustainable future for agriculture. Managing agricultural systems and their associated landscapes in a sustainable manner that preserves and promotes biodiversity will produce lasting economic and social benefits and will ensure future generations have access to these important resources.

Mission

To take urgent action to halt and reverse biodiversity loss and to put Ontario on a nature positive path by conserving, restoring and sustainably managing biodiversity for the benefit of communities, nature and climate.

OFA strongly agrees with OBS’s mission statement. As farmers, we must continue to prioritize enhancing our farmland to support the prosperous growth of food, fibre, and fuel for all current and future generations, which includes the protection and restoration of biodiversity.

Goals

Goal 1: Mainstream biodiversity across the province to halt its loss and become nature-positive.

Goal 2: Protect, restore and recover genetic, species and ecosystem diversity and related ecosystem functions, processes and services.

Goal 3: Manage biological assets sustainably and equitably, and scale-up nature-based solutions for biodiversity, climate and societal benefits.

Goal 4: Mobilize human and financial resources to scale-up actions to achieve mission and vision.

OFA strongly agrees with and supports these goals. Ontario farmers are stewards of the land and are part of the solution to protecting the planet. Farmers depend on the environment as a key to our food security to ensure Ontario has reliable access to a safe, sustainable food supply and agri-food system.

Section 5: Empower People

	Draft Target	Draft Actions
1	By 2025, sectors have developed plans in support of Ontario's Biodiversity Strategy and by 2030 those plans have been implemented.	<ol style="list-style-type: none"> 1. Develop action plans to incorporate biodiversity strategies into provincial and municipal levels of government, and across health, education, industry, not for profit, and business sectors. 2. Enhance policy and legislative frameworks to align with Ontario's Biodiversity Strategy. 3. Enhance the integration of biodiversity into renewable resources sectors (wildlife, fisheries, forestry, and agriculture) through the application of biodiversity friendly practices.

OFA supports this draft target and supporting actions. OFA acknowledges that improving biodiversity requires a multi-faceted, integrated approach that involves many stakeholders and industries. While some may consider the implementation of plans in support of OBS by 2030 a lofty goal, the [State of Ontario's Biodiversity 2020 Summary](#) shows that there has been continued progress in the implementation of supporting plans by many sectors. OFA believes that most stakeholders and industries should see themselves involved in the first action listed under this target. While not formally assessed for 2020 in the [Summary](#), previous years have also shown substantial progress has been shown in integrating biodiversity into government policies and programs.

Ontario farmers serve an important role in protecting and enhancing the natural environment and our most vital resources. Maintaining biodiversity on-farm is of critical importance; crops, plants, livestock, insects, water systems, soils, and natural landscapes all interact with and depend on each other. Best management practices (BMPs) can help to maintain and achieve greater biodiversity, enhancing the entire rural landscape, and can provide ecological goods and services to the public such as clean air, clean water, and healthy soils.

	Draft Target	Draft Actions
2	By 2025, the capacity for people to conserve biodiversity is increased and by 2030 people are widely engaged in implementing biodiversity actions across society.	4. Expand stewardship partnerships with Indigenous peoples, local communities and landowners.
		5. Develop and share information about biodiversity's links to human health, climate change, and the economy, and increase availability of tools and training to support biodiversity actions.
		6. Continue to integrate biodiversity education into all levels and all types of curricula, such as post secondary programs in land use planning, business, engineering and health.

OFA supports this draft target and supporting actions.

	Draft Target	Draft Actions
3	By 2030, biodiversity conservation programs and actions are inclusive, equitable and incorporate Indigenous knowledge and local perspectives.	7. Encourage equitable public participation in biodiversity decision-making and conservation including engaging with youth, new Canadians, Indigenous communities and under-represented groups.
		8. Support and embrace the opportunity and capacity for Indigenous peoples and local communities to develop and implement conservation programs.

OFA supports this draft target and supporting actions.

Section 6: Reduce Threats

	Draft Target	Draft Actions
4	By 2030 land use planning tools to maintain and enhance biodiversity, including natural heritage systems, are implemented at local, regional and provincial levels.	9. Implement land use planning approaches that conserve biodiversity and enhance connectivity and ecological function that emphasizes people’s connection to biodiversity.
		10. Identify Key Biodiversity Areas and improve their management and conservation.
		11. Maintain and expand natural infrastructure on municipal and private lands to increase biodiversity and enhance climate resilience within cities and communities.

OFA, in principle, supports this draft target and supporting actions. OFA would like to reiterate our position that the highest and best use of our arable land is for agriculture. Land capable of supporting agricultural activity is a strategic, non-renewable resource worthy of preserving as it ensures a safe, sustainable supply of food, fibre and fuel for the province, the nation, and the world. Without the preservation of farmland and water resources, there will not be a future for food, fibre or fuel production in Ontario. OFA advocates for responsible and balanced land use planning tools that protect farmland and simultaneously enhance biodiversity to maintain a safe and sustainable food supply for Ontario, Canada, and worldwide.

	Draft Target	Draft Actions
5	By 2030, efforts to manage the introduction, spread and establishment of high-risk invasive species and their pathways, are increased.	12. Promote partnerships with local governments, Indigenous communities and other organizations to manage invasive species.
		13. Develop and implement prevention strategies for main pathways of introduction of invasive species.
		14. Develop and implement innovative surveillance and control tools for high-risk invasive species.

OFA supports this draft target and supporting actions.

	Draft Target	Draft Actions
6	By 2030, the release of ecologically damaging pollutants from key sources is reduced to a level that is not harmful to biodiversity and the ecosystem services it provides.	15. Review, strengthen and implement strategies to reduce the release of harmful pollutants including pesticides, nutrients, plastics, air, light and noise pollution.
		16. Develop and implement strategies that strengthen biodiversity’s ability to reduce pollutants and improve air, water and soil quality.

Protecting biodiversity, the environment, and food security are not mutually exclusive; Actions to reduce threats to biodiversity must not hinder the ability of Ontario’s farmers to ensure food for the future.

OFA would like to reiterate that pesticides are a vital tool that can be used to safely manage pests that pose risks to the health and quality of agricultural crops, and even in the control of invasive species. These products are strategically used to minimize risk to beneficial species and allow for a biodiverse and robust ecological system that functions more efficiently to produce Canadians with a sustainable and secure food system. Pesticides in Canada are highly regulated to ensure that human and environmental health remain protected. Many strategies, including integrated pest management, are employed by Ontario’s farmers to protect the growth of their crops while maintaining the health of the environment.

Nutrient management is important for farmers in reducing environmental impacts while maximizing yields and economic benefits. Ontario’s farmers are part of the solution in preserving soil and improving water quality. 4R Nutrient Stewardship is a best management practice that utilizes a science-based approach to help growers efficiently use fertilizers to improve profitability while reducing nutrient losses to the environment.

OFA recommends that “based on current scientific knowledge” be added to the Draft Actions under Draft Target 6. Ontario’s farmers are leaders in developing and adopting farm practices that improve production and protect the environment, based on current research and scientific knowledge. Developed by government and industry experts using ongoing research and best available science, BMPs help guide farmers on the best ways to approach everything from controlling soil erosion and land drainage, managing pests, to nutrient management planning, no-till crop production and managing irrigation. BMP information is updated on a regular basis as science and environmental priorities evolve. These environmental stewardship activities help provide food, fibre and fuel for people, and provide care for our natural ecosystems.

	Draft Target	Draft Actions
7	By 2025 capacity for nature-based solutions is increased and by 2030, these solutions are scaled up to enhance biodiversity and support climate adaptation and mitigation.	17. Develop and implement climate smart tools and approaches for biodiversity protection, management and restoration activities.
		18. Promote and implement nature-based solutions to enhance climate mitigation and adaptation and resilience of both biodiversity and people to climate change, e.g., protection and enhancement of green, natural infrastructure.
		19. Quantify climate benefits of nature-based solutions in Ontario.

OFA supports this draft target and supporting actions.

	Draft Target	Draft Actions
8	By 2030, Ontario's per-capita resource consumption and waste generation is reduced and is within Ontario's biocapacity limits.	20. Report on Ontario's Ecological Footprint and Biocapacity and promote the use of this information in decision-making.
		21. Promote and support access to information related to consumption and waste (e.g., food, water, plastics), including ways to reduce and reuse waste.
		22. Identify and implement priority actions to reduce Ontario's Ecological Footprint.

OFA supports this draft target and supporting actions.

Section 7: Enhance Resilience

	Draft Target	Draft Actions
9	By 2025, priority restoration areas are identified and by 2030 efforts are underway to restore biodiversity to at least 30 percent of priority areas.	23. Increase availability of genetically appropriate native species capable of surviving future climate scenarios for restoration projects.
		24. Identify, prioritize and incentivize restoration of key terrestrial and aquatic ecosystems, including on private land areas and areas most affected by climate change, in a broadly inclusive and equitable manner.
		25. Investigate, develop and implement rewilding programs to help achieve restoration targets.

OFA supports this draft target and supporting actions.

	Draft Target	Draft Actions
10	By 2030 at least 30% of terrestrial and aquatic ecosystems are conserved through well-connected networks of protected areas and conservation lands.	26. Increase land protection and conservation opportunities (e.g. Other effective area-based conservation measures [OECMs]) on Crown and private land.
		27. Collaborate and coordinate with Indigenous communities and organizations to advance Indigenous-led conservation (e.g. Indigenous Protected and Conserved Areas [IPCAs]).
		28. Identify, protect and develop management plans for climate refugia in Ontario.

OFA, in principle, supports this draft target and supporting actions. As mentioned earlier, OFA would like to reiterate that the protection of Ontario's prime agriculture areas for their long-term

agricultural use is of the highest priority. Agricultural land should be protected for its ability to produce food, fibre and fuel safely and sustainably for the province and worldwide.

	Draft Target	Draft Actions
11	By 2030, the status of species and ecosystems in Ontario is improved.	29. Assess species and ecosystems vulnerabilities to threats (e.g., climate change, invasive species) and create and implement policies and management plans to reduce vulnerabilities.
		30. Develop and implement a genetic resource management strategy for wild species
		31. Maintain and restore habitat supply and connectivity to support healthy populations and natural and climate-driven movement of species.

OFA supports this draft target and supporting actions.

Section 8: Improve Knowledge

	Draft Target	Draft Actions
12	By 2030, Ontario's biodiversity research, monitoring and reporting system is improved, accessible and integrates local and Indigenous knowledge.	32. Invest in the preservation and integration of traditional ecological knowledge and community-based monitoring programs.
		33. Regularly review the status of knowledge about Ontario's biodiversity, including revision of research questions and strategies, identification of knowledge gaps and development of strategic partnerships.
		34. Continue to report on the state of Ontario's biodiversity and biodiversity targets at five-year intervals and share and expand access to biodiversity data and information.

OFA supports this draft target and supporting actions.

Section 9: Transform Investments

	Draft Target	Draft Actions
13	By 2030, biodiversity considerations are integrated into funding, investments, and financial disclosures.	35. Review and strengthen economic tools, such as incentives, that encourage conservation and increase private investments like green bonds.
		36. Promote accounting and disclosure principles and make data available to integrate the economic value of biodiversity and ecosystem services into

		decision making across all levels of government and sectors, including the financial community.
		37. Work with banking institutions to create positive biodiversity and climate resilient outcomes as a condition for financing land developers and resource extraction.

OFA supports this draft target and supporting actions.

OFA appreciates the opportunity to provide our feedback and agricultural perspectives on **ERO 019-6701: Ontario Biodiversity Council is renewing its Ontario’s Biodiversity Strategy and is seeking public input.**

Sincerely,



Peggy Brekveld
President

cc: Ontario Biodiversity Council
OFA Board of Directors