
February 9, 2024

Nature 2030 Team
Environment and Climate Change Canada

Sent via email to: nature2030@ec.gc.ca

To Whom It May Concern:

RE: Canada's 2030 National Biodiversity Strategy Milestone Document

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 the opportunity to provide our agricultural perspective on **Canada's 2030 National Biodiversity Strategy Milestone Document**.

Agriculture plays a fundamental role in everyone's life; 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 would like to acknowledge the important role that farmers currently serve in protecting and enhancing the natural environment and our most vital resources, and supporting measures that promote, protect, and restore biodiversity while maintaining economic, social, and cultural uses. OFA is a proud member of the Ontario Biodiversity Council, working alongside other stakeholders from environmental and conservation organizations, government, academia, industry, and Indigenous communities and organizations to conserve the biodiversity found in our province.

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. Protecting biodiversity, the environment, and food security are not mutually exclusive; Actions to reduce threats to biodiversity must not hinder the ability of Canadian farmers to ensure food for the future. OFA supports the principle of Canada's National 2030 National Biodiversity Strategy: Action is needed to halt and reverse biodiversity loss, but not at the expense of farmers or food production. OFA recognizes that conserving biodiversity isn't the responsibility of one government, organization, or sector; Strategies, targets and action plans targeted at preserving and promoting biodiversity must consider agriculture and agricultural systems. Engagement with agricultural groups and producers throughout policy development and implementation is critical

to ensure the goals, targets, and outcomes of the Biodiversity Strategy are realistic and meaningful.

OFA would like to provide the following comments on specific targets outlined in the Biodiversity Strategy:

Target 1: Spatial planning and effective management

Target 3: Protected and conserved areas (30x30)

OFA would like to restate its longstanding perspective that there is only one landscape; the full range of landforms and land uses found across the nation including urban, rural, agricultural, natural heritage, wildlife habitats, cultural heritage, aggregate extraction, etc. must share in this one landscape. Inherent in this is the recognition that our agricultural areas not only provide us with food, fibre, fuel and flowers but also a broad range of environmental and ecological goods and services that benefit all Canadians and the world.

OFA believes 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. Agricultural land is being lost at rates that are unsustainable; this land not only produces agricultural products, but supports jobs, preserves wildlife habitats, and makes significant positive environmental contributions. The loss of agricultural land is often overlooked and minimized when compared with the loss of other green spaces, such as wetlands and wood lands. Preserving farmland is just as critical as preserving other green spaces; Farmland ensures a safe, sustainable supply of food, fibre, fuel and flowers for Canada and the world, but also provides equally significant environmental and societal benefits as other natural and green spaces. OFA strongly advocates for responsible and balanced strategies and policies that protect farmland from development while simultaneously enhancing biodiversity to maintain a safe and sustainable food supply and agri-food system for Canada, and the world.

Target 4: Species recovery

The habitats of many species at risk are located on and around farms. Species and habitat provisions may severely constrain the ability of farmers to continue to produce safe, affordable, and local food for Canada and worldwide. Agricultural lands are a finite, shrinking resource relied upon for the ability to produce food, fibre, fuel and flowers. OFA supports the principle of protecting and recovering species at risk, but not to the detriment of agricultural lands and farmers. Recovery strategies and habitat regulations for species at risk must reflect that it is unsustainable to have a single-minded focus on species restoration that excludes all other factors.

Target 7: Pollution and biodiversity

Pesticides are a vital tool used to safely mitigate risks posed by pests to the health and quality of agricultural crops. Pesticide products can also be used in the control of invasive alien species (Target 6 of the Biodiversity Strategy). Farmers strategically use these products to minimize risk to beneficial species and allow for a biodiverse and robust ecological system that functions more

efficiently to provide Canadians with a sustainable and secure food system. Integrated pest management, alongside other strategies, is employed by farmers to protect the growth of their crops while maintaining the health of the environment and natural ecosystem.

Nutrient management is important for farmers in reducing environmental impacts while maximizing yields and economic benefits. 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.

Agriculture production uses primary, secondary, and sanitary packaging; the sector has little decision-making capacity on the use of these items. Many of the packaging are critical in maintaining safe and nutritious food for Canadians. Additionally, the choice of single-use plastics for some sanitary packaging for sterile items such as sharpies, veterinary supplies and pharmaceutical products are determined by health, safety, regulatory or technical concerns where these products may not be safely recycled using existing processes. OFA believes that any efforts to reduce plastic usage do not compromise food safety or food quality.

Target 8: Climate change and biodiversity

Climate change is a global challenge affecting agricultural production and the livelihoods of Canadian farmers. OFA recognizes that tackling climate change requires a multi-faceted approach, requiring action and investment across governments, communities, businesses, and individuals. Ontario farmers have already invested significantly in environmental stewardship initiatives to mitigate the impact of climate change. Consideration must be given as to ways to reduce the financial burden borne by farmers resulting from policy frameworks and legislations introduced to address climate change. Additionally, provincial, or federal climate change policies or strategies should not negatively impact the ability of farmers to remain competitive in domestic or international markets.

Farmers have invested significantly in environmental stewardship activities to mitigate the impact of climate change and in providing positive long-term benefits to our air, soil, and water quality. Through stewardship and best practices, farmers can mitigate our impact on the environment, and help offset the footprint of other sectors. Policies, programs, strategies, and research initiatives designed to address climate change must be developed that enable farmers to adapt and cope with the effects of climate change, and that support sustainable economic and productivity growth.

Target 10: Sustainable management in key productive sectors

Canadian farmers are actively involved in the continued development and implementation of sustainable management systems that consider biodiversity as part of their programs. Promoting best management practices 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. These best management practices are adopted by farmers on an ongoing basis as part of a long-term approach of continual improvement. OFA believes the widespread adoption of best management practices is key to transitioning to more sustainable production systems.

Target 14: Mainstreaming of biodiversity values

Target 15(a): Business' role

Target 18: Negative and positive incentives

OFA believes that maintaining and improving biodiversity requires a multi-faceted, integrated approach that involves many stakeholders and industries, and utilizes a range of policies, frameworks, and incentives. Farming and the land utilized to produce food and fibre are dependent on ecological goods and services, including healthy soil, and clean water and air. Farmers manage ecological services including water cycling, air quality, nutrient cycling, pollination services, habitat for species at risk, protection of wildlife, and soil erosion control to name a few. While farmers implement best management practices to preserve and promote these ecological goods and services, it is not typically recognized or encouraged through incentives. OFA believes farmers should be recognized and valued for their efforts to manage, maintain, and enhance the many elements of our environment through the adoption of beneficial management practices.

While preserving biodiversity is important, OFA believes that farmers should not have to bear the entire burden for preserving biodiversity and providing ecological goods and services on their land. While valued intrinsically by society, ecological goods and services provided by farmers, such as carbon sequestration, nutrient retention, providing and conserving wildlife habitat, etc., are not recognized or incentivised by current market and government systems, and place an unfair burden on farmers who provide these services to society. Society has an obligation to help share the costs associated with actions and costs farmers undertake to preserve biodiversity on their land for the benefit of society. These actions include remediation, beneficial management practices, protection, foregone income, etc. Society, consumers, and government should recognize the direct ecological benefits that farming provides on the environment and society. Farmers should be recognized and valued for their efforts to manage, maintain, and enhance the many elements of the environment; OFA believes that a fair system of incentive-based policies and programs that properly acknowledge the significant environmental contributions that result from the adoption of beneficial management practices should be developed and implemented.

Target 19: Resource mobilization- financial resources

Safe and sustainable food production is vital in ensuring the future of Canada and all Canadians. Financial pressures threaten the profitability and sustainability of farm businesses; Pressures such as inflation, rising interest rates, the high cost of living and running a business, costs and labour shortages to name a few. Farming is a business and needs to remain profitable and viable to continue providing long-term environmental, social, and economic benefits. Adequate financial

support must accompany the goals and targets in the Biodiversity Strategy, to ensure farmers can continue producing safe and nutritious food for Canada and the world.

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. Farmers are natural stewards of the land, relying on the air, soil and water to conduct their business and have a vested interest in the sustainability of these vital resources. OFA believes halting and reversing biodiversity loss is vital to our nation, but not at the expense of Canadian farmers and our food production system.

OFA appreciates the opportunity to provide our agricultural perspectives on **Canada's 2030 National Biodiversity Strategy Milestone Document**.

Sincerely,



Drew Spoelstra
President

cc: Canadian Federation of Agriculture
Ontario Biodiversity Council
OFA Board of Directors