



October 21, 2025

Sent via Ontario Regulatory Registry: Ministry of Environment Conservation and Parks

To whom it may concern,

Re: Proposed legislative and regulatory amendments to enable the Species Conservation Act, 2025

On behalf of the 19,000 members that Beef Farmers of Ontario (BFO) represents, I would like to bring forward our concerns regarding the proposed legislative and regulatory amendments to enable the Species Conservation Act, 2025.

BFO recognizes the need to support timely development by improving the efficiency of provincial permits and approvals. These improvements are critical to helping Ontario's agri-food sector respond to trade pressures such as U.S. tariffs and to contribute to the long-term economic resilience and competitiveness of the province. However, this progress must not come at the expense of endangered species or the protection of animal life within agricultural and livestock environments, nor should it compromise productive farmland.

The regulatory framework must provide clarity and predictability, ensuring that farmers are not burdened with unnecessary red tape for day-to-day activities that pose little to no threat to species at risk. BFO would like to see agriculture practices be added to the Exception Regulation list and generally accepted beef farming practices be exempt from obtaining a permit.

We also note that the determination of whether a registration or permit is required for a specific activity remains unclear and appears subject to change based on stakeholder input. BFO emphasizes the need for transparent criteria and consistent application of rules to avoid uncertainty and ensure fair treatment of the agricultural sector.

BFO strongly advocates for meaningful farmer representation and consultation throughout the species conservation process, including during listing decisions, habitat delineation, and conservation planning. This ensures that both local ecological conditions and agricultural production realities are fully understood and taken into account.

BFO urges the government to ensure that the Species Conservation Act, 2025, strikes a balanced approach that safeguards species at risk while also supporting the long-term viability of Ontario's livestock and agriculture sector. We welcome the opportunity to collaborate on the development of regulations that are clear, consistent, and practical for farmers, and we remain committed to working alongside government and conservation partners to protect both biodiversity and agricultural sustainability.

Sincerely,

Craig McLaughlin
President