
November 10, 2025

Public Input Coordinator - Species at Risk Protection
Species at Risk Branch
40 St Clair Ave West Toronto, ON
M4V 1M2

Submitted online and emailed to ESAReg@ontario.ca

To Whom It May Concern,

Re: ERO 025-0909: Proposed legislative and regulatory amendments to enable the Species Conservation Act, 2025

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

Ontario's agri-food sector is an economic powerhouse – producing more than 200 farm and food products, fuelling rural communities, generating over 860,000 jobs, and contributing over \$51.43 billion to Ontario's annual GDP. The province's agri-food strategy, Grow Ontario, aims to strengthen the agri-food sector, support economic growth, and ensure an efficient, reliable and responsible food supply. By removing barriers, unnecessary costs and red tape, Ontario farmers will be positioned to seize opportunities and rise to the challenge of an ambitious growth strategy, allowing the agri-food sector to drive the economy forward.

OFA appreciates the opportunity to provide input on **ERO 025-0909: Proposed legislative and regulatory amendments to enable the Species Conservation Act, 2025**. We reaffirm our longstanding view that Ontario's landscape is a shared one: home to rural, urban, agricultural, natural heritage, and aggregate uses. Agriculture is an essential component of this landscape, contributing food, fibre, fuel and flowers, and vital environmental and ecological goods and services, including habitat for species at risk. Protecting Ontario's prime agricultural areas for long-term agricultural use must remain a key provincial objective.

OFA supports a balanced, evidence-based approach to environmental legislation; one that protects species at risk while ensuring farmers have the clarity, tools, and support needed to manage their land and producing food, fibre, fuel and flowers sustainably. Improving the timeliness and efficiency of provincial permits and approvals is critical to reducing unnecessary administrative burden and maintaining Ontario's economic resilience. However, OFA believes

that modernization efforts must not compromise species protection or the preservation of productive farmland. The new regulatory framework must be science-based and not impose additional red tape for farmers or uncertainty for routine agricultural activities that pose minimal or no threat to species at risk.

As mentioned in our previous submission on [ERO 025-0380: Proposed interim changes to the Endangered Species Act, 2007 and a proposal for the Species Conservation Act, 2025](#), OFA continues to emphasize the need for clear and consistent criteria to determine when an activity requires registration versus a permit under the *Species Conservation Act, 2025 (SCA)*. Currently, these determinations appear subjective, open to interpretation or change based on stakeholder input, creating confusion and uncertainty for landowners.

To enhance clarity, promote compliance, and support cooperative stewardship, OFA recommends that the government establish:

- Transparent decision criteria published in regulation,
- A predictable, publicly available registry of activities eligible for registration, and
- A process for farmers to obtain advanced guidance to ensure compliance certainty.

Agricultural practices are hindered when farmers face severe and unnecessary restrictions. OFA strongly recommends that generally accepted agricultural and livestock management practices be included in the Exception Regulation list, and that agricultural practices be exempted from permitting requirements. Farmers manage complex, dynamic ecosystems daily, and many species at risk are present because of these working landscapes. Recognizing everyday agricultural activities as low-risk exceptions will ensure that species protection and farm operations can successfully coexist.

OFA also reaffirms that listing decisions and habitat delineations must remain science- and evidence-based, reflecting social, economic, and ecological realities, and avoid blanket designations that unnecessarily affect farmland. We strongly recommend farmer representation throughout all stages of the species conservation process, including species listings, habitat mapping, and conservation planning and actions. Farmers possess invaluable, practical knowledge of habitat conditions, species interactions, and land management practices. Their early and consistent participation will lead to more practical and effective conservation outcomes, while ensuring continued sustainable food, fibre, fuel and flower production for Ontarians.

OFA urges the government to ensure that the *Species Conservation Act* and its corresponding regulations deliver a transparent, balanced, and practical framework; one that protects biodiversity while sustaining the agricultural landscapes that make biodiversity possible. We appreciate the opportunity to provide input on **ERO 025-0909: Proposed legislative and regulatory amendments to enable the Species Conservation Act, 2025**, and look forward to ongoing collaboration to achieve an effective regulatory framework that protects species at risk while ensuring a viable agri-food system in the province.

Sincerely,

Drew Spoelstra

Drew Spoelstra
President

cc: Hon. Todd J. McCarthy, Minister of the Environment, Conservation and Parks
Hon. Lisa M. Thompson, Minister of Rural Affairs
Hon. Trevor Jones, Minister of Agriculture, Food and Agribusiness
OFA Board of Directors