



**Ontario  
Cattlemen's  
Association**

*Committed to Cattlemen*

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Jeremy Downe  
Senior Policy Advisor  
Ministry of Natural Resources  
Species at Risk Branch  
300 Water Street  
Floor 2, Robinson Place South Tower  
Peterborough, K9J 8M5

May 16, 2011

Re: EBR Registry Number 011-2901 - Amendment to Ontario Regulation 242/08 - Bobolink

Dear Mr. Downe,

The Ontario Cattlemen's Association (OCA) appreciates the opportunity to comment on the Ministry's recently released bobolink regulation proposal. We are pleased that the Ministry of Natural Resources (MNR) has recognized the significant role agriculture plays in providing bobolink habitat, and the conflict this causes between habitat conservancy efforts and normal farming practices.

The proposed three-year exemption under the ESA will allow farmers to continue their current agricultural practices without fear of prosecution. However, it must be emphasized that during this three-year period, the government must continue to work closely with stakeholders to develop a longer term plan for bobolink conservation through development of a recovery strategy, a government response statement, and a habitat regulation under the ESA. Furthermore, while OCA supports the protection of bobolink and all endangered species in Ontario, it is our belief that since all of society benefits from the protection of listed species and their habitat, no one sector of society should bear the costs (i.e. individual farmers and rural landowners).

While we support the amendment to the Ontario Regulation 242/08 under the Endangered Species Act (2007) with regard to bobolink, we are concerned about the lack of detail outlining options for stewardship programs and compliance incentives to be tied with the exemption. However, it is our understanding that the proposed establishment of an advisory group will support the development of a long term approach to Bobolink recovery, and will address the above stated shortcoming.

Grassland agriculture, particularly the province's cow-calf sector, plays a critical role in providing habitat for bobolink. In recognition of this fact and the Ministry's commitment to the establishment of an advisory group, OCA is prepared to, and expects to, be named as a participating member of this group.

The Ontario Cattlemen's Association (OCA) is fully committed to working with the Ministry of Natural Resources and other industry stakeholders on the bobolink recovery strategy. OCA, alongside other industry and conservancy organizations, has a vested interest in reaching a workable and mutually beneficial outcome.

Best regards,

A handwritten signature in black ink, appearing to read "Richard Horne", with a long horizontal flourish extending to the right.

Richard Horne  
Policy Advisor  
Ontario Cattlemen's Association

cc: OCA Board of Directors