



## Manitoba Beef Producers' Submission

### Consultation on Amending the List of Species under *The Species at Risk Act* for Terrestrial Species

March 4<sup>th</sup>, 2013

#### A. Introduction

Manitoba Beef Producers appreciates the opportunity to provide input into the consultation on amending the list of terrestrial species under the *Species at Risk Act* (SARA).

Manitoba Beef Producers (MBP) is a non-profit organization, with a producer-elected board that consists of 14 directors, each representing cattle producers in a specific region or district. MBP represents approximately 8,000 individual cattle producers involved in various aspects of the beef cattle industry, including the cow-calf, backgrounding, and finishing sectors.

Agriculture drives a significant portion of Manitoba's Gross Domestic Product and is one of the province's largest wealth-generating activities. Beef production represents Manitoba's single largest agricultural sector in terms of the number of individual farm operations.

On an annual basis Manitoba's beef cattle industry purchases more than \$300 million in feed. Beyond feed, beef producers purchase \$225 million in operating inputs annually. The value of goods and services demanded by Manitoba's beef operations is about \$635 million annually.

The beef industry also plays a vital role in the maintenance of Manitoba's environmental sustainability.

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MANITOBA CATTLE PRODUCERS ASSOCIATION

## **B. General Comments – Beef Production’s Role in Sustainability**

According to a study conducted by the University of Manitoba on the Value of Grasslands in Manitoba, the total assessed value of the social, agricultural, and landscape-ecological grassland function in Manitoba is \$31.4 billion.

Moreover, pastures are widely sought by various species and wildlife. Pastures are home to 33 different species at risk (endangered and threatened).

Manitoba’s beef producers maintain and preserve wetlands and perennial green cover on their pastures, which provide ecological goods and services that are otherwise lost through drainage and restoration. Most often this valuable work is done by producers who receive no financial incentives, yet recognize the value of maintaining healthy ecosystems.

MBP funds research related to beef production and its influence on the landscape. It also promotes the use of beneficial management practices to mitigate potential environmental impacts and to ensure the landscape is being effectively managed.

Manitoba Conservation and Water Stewardship recognizes the importance cattle production plays in preserving habitat for the Baird’s sparrow. In their fact sheet on this species, they note “Programs which keep cattle producers on the land also benefit the Baird’s sparrow, since in many parts of its range the continued existence of grasslands is due to the presence of livestock.”

Similarly, in their factsheet on buffalograss, Manitoba Conservation and Water Stewardship notes that buffalograss is adapted to grazing and is often found in native pastures. And, with respect to the Hairy Prairie clover, the department notes that a certain amount of disturbance, such as grazing, can be beneficial for this species to grow.

MBP is pleased to see recognition by Environment Canada of the role that grazing can play in terms of habitat protection for species such as the Baird’s sparrow and buffalograss.

## **C. Federal/Provincial Co-ordination**

Five species with range in Manitoba are covered through this federal consultation. Two of these species are not currently listed in Schedule 1 of SARA – the Baird’s sparrow and the buff-breasted sandpiper. Both are proposed to be listed as species of special concern.

By comparison, under Manitoba’s *Endangered Species Act* the Baird’s sparrow is listed as an endangered species. Buffalograss is listed as a threatened species, the grizzly bear as extirpated and the Hairy Prairie clover as threatened. The buff-breasted sandpiper is not listed at all under the Manitoba legislation.

MBP's first significant comment on this consultation is the need to better co-ordinate species and habitat designation at the provincial and federal levels. Different federal and provincial requirements cause confusion for producers and inhibits coordinated efforts to meet both the environmental management goals of producers and civil society.

#### **D. Environmental and Rural Stewardship**

Beef production in Canada produces many external benefits to society. The introduction highlighted some of these benefits including the production of sustainable habitat and the protection of many species at risk. Other potential environmental benefits include the preservation of wetlands.

Governments are searching for ways of increasing protection for vulnerable habitat and species at risk. However, straight economic drivers tend to encourage landowners away from practices that increase habitat and wetland conservation.

There is a straightforward market based solution that will help society accomplish its conservation goals and give producers the opportunity to continue (and expand) the practices that generate environmental benefits.

To date producers have not been compensated for the external environmental benefits that they provide to society. If governments were to amend this shortcoming and provide market-based compensation for the environmental goods and services already provided producers would have adequate economic incentives to increase conservation management practices.

The Government of Canada has undertaken ecological goods and services (EG&S) related pilot projects. A number of these projects were delivered through the Government of Canada's Watershed Evaluation of Beneficial Management Practices (WEBs) research focus under the Greencover Canada program. The projects include the joint Agriculture and AgriFood Canada/Ducks Unlimited Canada research project at South Tobacco Creek near Miami, MB. Manitoba has also played a leadership role in the investigation of agri-environmental incentive initiatives, as seen by the development of agri-environmental incentives initiatives.

MBP has directly has been directly involved in the development of environmental programs through collaboration with the University of Manitoba and the Manitoba Rural Adaptation Council on a \$500,000+ research project into the environmental value of Manitoba forages and the scientific quantification of carbon lifecycles on Prairie cow-calf operations.

Enough work has been done to unequivocally state that programs designed to compensate producers for the delivery of environmental goods and services will increase conservation management practices and accomplish many of society's environmental objectives. Additional research is not required prior to launching initiatives

These societal benefits can be accomplished without rigid legislation and heavy-handed regulation. Market-based environmental incentives are flexible and can be easily adjusted to changing circumstances and new knowledge.

Manitoba Beef Producers calls on the Government of Canada, specifically Environment Canada and Agriculture and Agri-Food Canada, to work with provincial governments to implement an effective environmental goods and services programs to encourage expanded adoption of conservation management practices by Canadian beef producers.

Our request matches Environment Canada's goals. Environment Canada had outlined operating principles of delivery-focused conservation:

1. Approaches to conservation management that can be harmonized with other landscape uses;
2. Adaptive management that responds to changing conditions of birds and of the landscape;
3. A precautionary approach that promotes conservation when knowledge is incomplete;
4. Principles of sustainable development that allow for economic/social uses of the land;
5. A commitment to stakeholder involvement.

#### **E. Specific Comments on Schedule 1**

At this time, MBP does not have any specific concerns with the changes being proposed to Schedule 1 as they relate to the five species identified in relation to Manitoba.

Looking ahead, Manitoba Beef Producers asks to be consulted as recovery strategies, action plans or management plans are being developed for species listed under SARA. This will not only ensure that local beef industry concerns are addressed but also ensure producers can most effectively fulfill their role in managing and protecting habitat for species at risk.

#### **F. Conclusion**

Manitoba Beef Producers strongly supports science-based stewardship initiatives aimed at preserving ecosystems designed in co-operation with the producers who manage the landscape. It is MBP's position that co-operation between producers and government, as opposed to excessive regulation, will always lead to more effective results and to programs that are flexible enough to meet challenges and changes over time.

Furthermore, MBP believes it is imperative that producers and governments work together to develop environmental initiatives that can be embraced by all sectors of our industry without harming producers' ability to earn a living. Similarly, any concerns related to producer liability relative to having a species at risk on their operations must be addressed as recovery strategies, action plans or management plans are being developed under SARA.

Manitoba's beef industry remains strongly committed to ecosystem protection and Manitoba Beef Producers reminds policy makers that producers should not shoulder this considerable cost alone. MBP would be pleased to participate in the design of incentive-based programs in this regard.