

CANADIAN PARKS AND WILDERNESS SOCIETY (CPAWS)

SPEAKING NOTES ON Bill C-40

**TO THE FEDERAL STANDING COMMITTEE ON
ENVIRONMENT AND SUSTAINABLE DEVELOPMENT**

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Éric Hébert-Daly, National Executive Director (eric@cpaws.org)

Introduction:

Good afternoon and thank you for this opportunity to share with the Committee our recommendations for Bill C-40, An Act Respecting the Rouge National Urban Park. My name is Éric Hébert-Daly, National Executive Director at CPAWS.

Since our creation 50 years ago, CPAWS has played a key role in the establishment of over two-thirds of Canada's protected areas. We have 13 regional chapters in nearly every province and territory, including CPAWS Wildlands League chapter in Toronto, as well as a national office here in Ottawa, and over 60,000 supporters across the country. We work collaboratively with governments, industry, First Nations and others to conserve Canada's natural heritage.

Over the past five years CPAWS has celebrated and welcomed several new federal park initiatives, most notably the six-fold expansion of Nahanni National Park Reserve in 2009, and the creation of Gwaii Haanas National Marine Conservation Area in BC in 2010.

Today we are here to discuss a different kind of park -- the creation of Canada's first National Urban Park in the Greater Toronto Area. CPAWS has been supportive of the idea of the Rouge National Urban Park from its inception. We see it as a remarkable opportunity to better protect a very special natural valley right in Canada's biggest urban area and to engage and connect people with nature.

Let me also be clear that CPAWS has recognized from the very beginning that farming

is, and will continue to be, an important aspect of this park. We believe that farming can contribute to nature conservation, and at the same time nature conservation can contribute to farming. And that we, as conservationists, share a common interest with farmers – that of keeping urban development from these lands. We often remark that the opportunity to create this national urban park is due to the farmers and farms which have kept urban development at bay and to the local grassroots groups who have championed the Rouge for decades.

In recent weeks we have listened with interest to debates about the appropriate management framework for the Rouge. Should it be ecological integrity or ecosystem health? While we think there are valid arguments being made for both, CPAWS believes there is a more fundamental issue that needs to be addressed in the legislation – **that nature conservation be clearly identified as the overarching priority for managing the park.** This gets to the very essence of what a park is. Without it, we do not have a park. We have something else -- perhaps a multi-use zone. Prioritizing nature conservation is consistent with international standards for protected areas, and with existing federal and Ontario provincial legislation for parks and protected areas. It can, and should, be reflected in the Rouge legislation too. Yet it is absent from the current Bill, which only requires that the Minister “take into consideration” nature and wildlife in managing the park.

For several years Parks Canada has expressed a preference for managing the Rouge National Urban Park under an ecosystem health framework, rather than an ecological integrity framework, to distinguish national urban parks from other national parks. In the spirit of being solutions-oriented we have developed constructive recommendations that focus on ecosystem health.

We are recommending that the legislation be amended to clearly identify “maximizing ecosystem health to the greatest degree possible” as the overarching management goal for the Rouge. And that a robust definition for maximizing ecosystem health be embedded in the legislation.

Our recommendations would mean that language in the Bill would meet international and Canadian standards for protected areas. They would provide park managers with stronger tools to protect the park's existing natural values, and to improve the health of its ecosystems as much as possible given its urban and agricultural context. It would make Parks Canada accountable for improving the health of the ecosystem over time, while not giving the impression that they must achieve an endpoint of full ecological integrity.

Moreover, our recommendation would provide a clearer mandate and incentive for Parks Canada to work collaboratively with farmers to identify strategies that would be good for nature and for farmers in the long run.

We have also identified several other areas where the legislation needs strengthening:

- **Management planning** –requirements for setting ecological objectives and indicators, as well as provisions for ecological monitoring and reporting are needed in section 9.
- A **State of the Park report** should be required to be presented in Parliament every five years, as is the case for national parks, so Parliamentarians and the public can track the how well Parks Canada is meeting its objectives over time.
- Related to **public infrastructure**, sections 12 and 16 need to be bolstered with stringent criteria to guide decision making prior to the clearing of land or disposal of land for infrastructure. For example, we suggest decision makers be required to consider reasonable alternatives, and ensure that lowest cost is not the sole justification for infrastructure proposals that might harm the park.

Finally, I would like to acknowledge parts of the Bill that we support, and would like to see remain in an amended Bill.

- We support the list of prohibitions in the current Bill.
- And we support the fixed limit of a maximum of 200 ha that can be removed from the park for infrastructure.-This is critically important to avoid the park being nibbled away at over time.

CPAWS urges Committee members to work together to strengthen this Bill to ensure that the Rouge National Urban Park effectively protects this natural treasure in the long term, while also supporting a healthy farming community and encouraging people to connect with nature.

We have prepared several specific amendments that we will provide to all members of the Committee in the coming days.

Thank you for the opportunity to share our recommendations. We would be pleased to answer any questions you may have.