

CPAWS recommendations to the Minister's Round Table on Parks Canada

January 27, 2017

SUMMARY OF RECOMMENDATIONS

Under the *Parks Canada Agency Act*, the federal Minister of Environment and Climate Change is required to convene a Round Table every two years so that interested Canadians may provide their feedback and recommendations on how Parks Canada is delivering on its mandate:

8.1(1) The Minister shall, at least once every two years, convene a round table of persons interested in matters for which the Agency is responsible to advise the Minister on the performance by the Agency of its responsibilities under section 6.

CPAWS is pleased to submit recommendations herein to the Minister's Round Table on Parks Canada. This document is divided into two parts: 1) a summary of CPAWS' observations on the trends in Parks Canada's management of national parks along with CPAWS' recommendations on each issue; and 2) a more detailed background and rationale for CPAWS' recommendations, including factual information underpinning the reason for each recommendation.

Introduction

It is very clear that the Minister has a legal responsibility to manage our national parks with nature conservation as the priority so that collectively, as Canadians, we can pass them along unimpaired for future generations. This is set out in both the *Canada National Parks Act* and the *Parks Canada Agency Act*.

The *Canada National Parks Act* states that:

4.(1) The national parks of Canada are hereby dedicated to the people of Canada for their benefit, education and enjoyment, subject to this Act and the regulations, and the parks shall be maintained and made use of so as to leave them unimpaired for the enjoyment of future generations.

The Act further clarifies that implementing this overarching purpose requires that:

8.(2) Maintenance or restoration of ecological integrity, through the protection of natural resources and natural processes, shall be the first priority of the Minister when considering all aspects of the management of parks.

The Parks Canada Agency Act further clarifies this requirement to put nature first, stating that it is in the national interest:

(l) to maintain ecological and commemorative integrity as the prerequisite to use of national parks and national historic sites, and

(m) to manage visitor use and tourism to ensure both the maintenance of ecological and commemorative integrity and a quality experience in such heritage and natural areas for this and future generations.

Our national parks are supposed to be our most protected natural areas. Yet, for almost a decade CPAWS has observed a significant shift in Parks Canada's management of our national parks away from their legislative first priority of protecting nature towards a more tourism and marketing-focused agenda which is putting wildlife and wilderness in our national parks at risk.

CPAWS is encouraged by the commitments made by the current federal government to limit development in national parks, re-focus on ecological integrity, re-invest in science-based management, ensure open and transparent decision-making, and work more collaboratively with stakeholders and the public. We also welcome the commitments to create new national parks and national marine conservation areas and to achieve our international targets of protecting at least 17% of our landscape and 10% of our ocean by 2020. And we are pleased that the federal government has committed to looking beyond 2020 to what's needed to conserve our terrestrial, freshwater and marine ecosystems in the long term.

In the first year of your government's mandate, we welcomed two important decisions that begin to deliver on the national park management commitments – the cancellation of the giant Mother Canada statue proposed for Cape Breton Highlands National Park, and the strengthening of the legislation to better protect Rouge National Urban Park. However, there is much more to be done to safeguard the future of nature in our parks and marine conservation areas.

While our submission focuses primarily on national park management issues, we have also identified significant weaknesses and gaps in the management framework for national marine conservation areas (NMCAs) that need addressing, as well as highlighted opportunities for Parks Canada to take a leadership role in expanding our protected area systems.

There is also much to be done to create new national parks and national marine conservation areas as contributions to meeting our international targets. Canada is lagging well behind most countries, with only 10% of our landscape and less than 1% of our ocean protected¹. Last

¹ Protecting Canada: Is it in our Nature. Available at: http://cpaws.org/uploads/CPAWS_Parks_Report_2015-Double_Page.pdf ; and Dare to be Deep: Charting Canada's Course to 2020. Available at: http://cpaws.org/uploads/CPAWS_DareDeep2020_final.pdf

month, CPAWS welcomed the new Pathway to Target One process that is bringing together federal, provincial, territorial and Indigenous governments with civil society and others to craft a plan to achieve our protected area targets. This is a step in the right direction and we are excited to get involved to help realize successful outcomes. We are already actively participating in efforts led by Fisheries and Oceans Canada with Parks Canada and Environment Canada to expand marine protected areas.

Last July, CPAWS released *Protecting Canada's National Parks: A Call for Renewed Commitment to Nature Conservation*, a [report](#) documenting the significant shift that has occurred in recent years in how Parks Canada is managing our national parks away from nature conservation and towards marketing, tourism and infrastructure development, often at the expense of nature. The report identifies significant cuts to Parks Canada's conservation capacity, shifting program objectives, and a major decline in public participation opportunities as being of particular concern.²

Parks Canada's recently released *State of Canada's Natural and Cultural Heritage Places*³ report shows that 46% of national park ecosystems are in fair or poor condition. It also shows that since the last report was tabled in 2011, 28% of ecosystems have been dropped from the ecological integrity monitoring program, reflecting the dramatic budget cuts to Parks Canada's science and monitoring that occurred under the previous federal government.

Unfortunately, there is no way to understand what is happening in each park since the data is not publicly available, and State of Park reports for individual national parks are no longer released to the public, which is indicative of the broader problem of loss of transparency about the Agency's work.

At the same time, new infrastructure development, particularly in Banff and Jasper National Parks, is putting more and more pressure on sensitive park wildlife such as caribou and grizzly bears, and there is no longer a legal requirement for environmental assessments of most projects in national parks under CEAA 2012.

Unless there is a shift in focus in Parks Canada's management approach back towards nature conservation and stewardship, the legislative responsibility and the legacy we pass along to future generations is at risk.

The need to refocus on nature conservation is urgent. We hope that 2017 will be the year that conserving nature through parks and protected areas takes centre stage in Canada and achieves significant results.

² Available at: http://cpaws.org/uploads/CPAWS_Parks_Report_2015-Double_Page.pdf

³ <http://www.pc.gc.ca/eng/docs/pc/rpts/elnhc-scnhp/index.aspx>

CPAWS Recommendations to the Minister's Round Table:

Our recommendations to the Round Table are intended to support the Minister in implementing her legislative mandate as well as the federal government's conservation commitments as outlined in mandate letters and the election platform.

CPAWS recommends that the Minister:

A. Re-focus on ecological integrity and restore open, transparent decision-making by:

1. Striking an independent expert advisory committee with a specific mandate to advise the Minister on fulfilling her legislative requirement to maintain or restore ecological integrity as the first management priority. This committee could meet at least bi-annually, and tackle issues such as:
 - a. Reviewing the ecological integrity monitoring and public reporting program to ensure its scientific rigour and transparency;
 - b. Guiding the establishment of a peer review process for Parks Canada's science program;
 - c. Reviewing policies and plans, including management plans, to ensure they are compatible with the ecological integrity mandate and subject to adequate public review;
 - d. Making recommendations to focus visitor experience programs on supporting nature conservation and stewardship goals; and
 - e. Reviewing potential perverse financial incentives in the management system that encourage inappropriate development, and recommending ways to encourage ecological incentives.
2. Providing clear Ministerial direction to all Agency staff at all levels that maintaining or restoring ecological integrity must be the number one priority in all aspects of park management;
3. Re-investing at least \$25M per year in park science, ecological monitoring and public reporting as per the government's election promise;
4. Restoring the requirement to review park management plans to every five years (instead of 10), and to produce State of Park reports for each park every five years that are peer reviewed and publicly available;
5. Making ecological and social science monitoring datasets publicly available by the end of 2017, and putting in place mechanisms to assure regular updates;

6. Integrating climate change considerations into all Parks Canada policies and plans; and
7. Actively pursuing opportunities to engage in conservation initiatives beyond park boundaries, for example creating buffer zones around Gros Morne and Wood Buffalo National Parks, both of which are World Heritage Sites whose protection is under scrutiny from UNESCO.

B. Deliver on the government's commitment to limit development in national parks by:

1. Commissioning an independent review of Parks Canada decision making processes, particularly in Banff and Jasper National Parks, to deliver on the Minister's legislative mandate to protect ecological integrity and commitment to open, transparent decision-making in the public interest. Currently these processes are enabling infrastructure developments to proceed even where they contravene policy and legislation;
2. Publicly committing to no expansion of the development footprint in Banff and Jasper National Parks. This will require stopping the proposed expansion of the Lake Louise Ski Resort, the proposed new bike path through endangered caribou and grizzly habitat in Jasper, and the resort that was proposed at Maligne Lake in Jasper; and
3. Restoring a legal requirement for the highest standard of environmental assessment for all projects in national parks and national marine conservation areas. For more detailed recommendations, see CPAWS submission to the Environmental Assessment Review Panel.⁴

C. Focus on nature-based visitor experiences in national parks by:

1. Through an open, transparent process, creating a national park visitor experience strategy that prioritizes nature-based activities rather than infrastructure-based or mass recreational activities, and which emphasizes interpretation, education and stewardship programs delivered by staff on the ground; and
2. Creating a public transportation strategy for national parks to alleviate traffic and crowding, and to support climate change mitigation. This should include enhanced public transit to and within parks.

⁴ For CPAWS detailed recommendations to the Environmental Assessment Review Panel, see: http://eareview-examenee.ca/wp-content/uploads/uploaded_files/cpaws-submission-to-review-panel-dec-23.pdf
For Guidance on Environmental Assessments in World Heritage Sites, see:
https://cmsdata.iucn.org/downloads/iucn_advice_note_environmental_assessment_18_11_13_iucn_template.pdf

D. Expand Canada's protected areas systems by:

1. Completing all currently proposed national parks by 2020.⁵
2. Creating a new system plan for national parks by 2020 that reflects up-to-date conservation science and Indigenous knowledge, integrates climate change considerations, and embraces the opportunity to work with Indigenous governments to create and manage protected areas;
3. Incorporating protected areas into national climate change plans to reflect their value as “natural solutions”;
4. Co-leading and supporting Canada's nationwide effort to protect at least 17% of the landscape by 2020 through the Pathway to Target 1 process, including providing support for systematic conservation planning;
5. Providing adequate levels of funding to complete the current representative national park system by 2020, as well as to create a new national park system plan, and to complete the representative NMCA system by 2030;
6. Completing proposed national marine conservation areas and identifying new sites to contribute to protecting at least 10% of our ocean by 2020, and then going substantially beyond to what's needed to conserve nature. Site selection and design must reflect the quality measures in the international targets, as well as the percent target;⁶
7. Updating the NMCA Act to provide stronger protection measures, including ecological integrity as the primary management objective, as is the case for national parks;
8. Prioritizing the development of policies and regulations to implement the NMCA Act, including a zoning framework and scientific guidance for no take areas (ie. 30%).
9. Leading a nation-wide effort to plan for the large-scale protection needed beyond 2020 to conserve nature in the long term, based on science and Indigenous knowledge; and
10. Leading an initiative, in partnership with Indigenous governments, to explore what policy and legislative changes are required by public governments to support the establishment of Indigenous Protected Areas, created and managed by Indigenous governments, or truly co-managed with public governments.

⁵ Current National Park proposals include: Thaidene Nene, NWT; South Okanagan-Similkameen, BC; Flathead Valley, BC; Manitoba Lowlands, MB; and Northern BC/Southern Yukon (Parks Canada Region 7).

⁶ NMCA opportunities include: Lancaster Sound, NU; Southern Strait of Georgia, BC; les Iles de la Madeleine, QC, Tawich, QC, Bay of Fundy, NB/NS; South Coast Fjords, NL.

CPAWS Recommendations to the Minister's Round Table on Parks Canada:

Rationale and background information

January 27, 2017

Introduction:

The Canadian Parks and Wilderness Society (CPAWS) is Canada's public voice for parks and wilderness. CPAWS is a national charitable conservation organization that has played a key role in the creation and protection of parks and protected areas in Canada for over 53 years. Our vision is to keep at least half of Canada's public land and water wild — forever, and to ensure our parks are managed to protect nature first. We focus on protecting large, connected areas of Canada's wilderness, on land and in the ocean. We have 13 regional chapters across Canada, a national office in Ottawa, and over 100,000 supporters.

In recent years, we have observed significant “mission drift” in the management of our national parks as the Parks Canada Agency (Parks Canada or the Agency) has shifted its focus away from nature conservation as the priority, and towards marketing, tourism, revenue generation and infrastructure development, at the expense of the nature Canadians want our national parks to protect. The Agency has approved a series of new infrastructure developments in Banff and Jasper, shrunk science and conservation budgets, dramatically reduced opportunities for the public to have a say in the future of our parks, as well as interpretation and education programs. Its organizational culture appears to have changed from a conservation organization to more of a for-profit, corporate tourism agency.

This is not the first time this kind of shift has happened. In the 1960s, 70s and 90s there were periods when tourism and commercial interests threatened to overtake the public interest in protecting our parks. In fact, CPAWS was created in 1963 to ensure a strong grassroots group of park lovers in Canada existed to respond to the enormous commercial and recreational pressures that were then threatening our national and provincial parks.

Each time our parks have been under threat, Canadians have rallied to protect them, and with strong political leadership, the management focus has been shifted back towards conservation. The current federal government has made important commitments to limit development in parks, re-invest in science and monitoring, restore open, transparent, evidence-based decision making and expand our protected area systems. Through the 2017 Minister's Round Table consultations, Canadians are standing up to express their support for this refocus on nature. We are hopeful that this will provide the impetus required to fully implement these commitments. It is in the spirit of supporting this effort that we offer our recommendations.

Most of the focus of our submission is on national park management. However, CPAWS also has a strong interest and involvement in the establishment of new national parks as well as the creation and management of national marine conservation areas. We have included recommendations on these issues as well.

We have organized our recommendations into four categories, which are related to the federal government's platform and mandate letter commitments:

1. Refocusing on ecological integrity and evidence-based management, and restoring open, transparent decision-making;
2. Delivering on the government's commitment to limit development in national parks;
3. Focusing on nature-based visitor experiences; and
4. Expanding Canada's protected areas systems

CPAWS' recommendations are outlined at the beginning of this submission. In this section of the document we provide more detailed background and rationale to support these recommendations.

A. Refocusing on ecological integrity, and restoring open, transparent decision-making

Commitments:

CPAWS welcomes the Government of Canada and Minister's commitment to:

- protect the ecological integrity of our national parks
- restore funding for ecological science and monitoring
- open, transparent and evidence-based decision-making, and
- reviewing Canada's environmental assessment processes to regain public trust.

Background:

The fundamental principle that has guided our national parks since the first *National Parks Act* was enacted in 1930 is that they must be passed along "unimpaired" to future generations of Canadians. The *Canada National Parks Act* and the *Parks Canada Agency Act* make clear that delivering on this principle requires maintaining or restoring ecological integrity as the first priority in park management, and as a prerequisite to visitor use in our national parks.

In the 1990s, Canadians expressed their outrage in response to enormous commercial development pressures threatening nature in Banff National Park. The federal government responded by appointing three independent expert panels to study Parks Canada's approach to managing national parks and provide recommendations for how to protect their ecological integrity while also providing opportunities for people to enjoy, learn about and appreciate nature: the Banff-Bow Valley Panel, the Ecological Integrity Panel, and the Outlying Commercial Accommodations Panel.

The Panel on the Ecological Integrity of Canada's National Parks was particularly instrumental in shifting management of all national parks to align with the ecological integrity-first mandate. Their findings confirmed that virtually all parks were under threat from stresses originating both inside and outside their boundaries, and "*Unless action is taken now, deterioration across the whole system will continue.*" The Panel made sweeping recommendations to the Minister and the Parks Canada Agency on how to reverse this trend, all of which were accepted by the Minister.

The work of these three expert panels resulted in a suite of protective measures being put in place in the late 1990s and early 2000s to address the on-going challenge of maintaining a focus on conservation once and for all. Some of the many measures included:

1. Clarity in the *Canada National Parks Act* that the maintenance or restoration of ecological integrity is the first priority in all aspects of park management;
2. Direction in the *Parks Canada Agency Act* that maintaining ecological integrity is a prerequisite to use of national parks;
3. Building the science capacity of the Agency and putting in place an ecological integrity monitoring and reporting system to guide park management;
4. Committing that no new land will be made available for commercial development in Banff National Park;
5. Prohibiting new outlying commercial accommodations outside park townsites in the Rocky Mountain National Parks, as well as limits to development for existing establishments;
6. Providing for the designation, by regulation, of wilderness areas in national parks to place "a legislative constraint on development;" and
7. Creating fixed legal boundaries and legislative commercial development caps for park communities and a permanent population cap for the Town of Banff.

Significant progress was made in the early 2000s to refocus the Agency on delivering on its "ecological integrity first" mandate, and putting the needs of nature at the centre of all decision-making. Parks Canada built a strong science program and an ecological integrity management framework that required staff in each park to identify clearly measurable ecological objectives, monitor progress based on a set of indicators, report publicly on the state of park ecosystems, and use this information to inform park management plan reviews.

The Agency also focused considerable effort on building partnerships with Indigenous peoples, with other governments, and with private partners to collaborate in managing the broader landscape around national parks. They worked with the tourism industry to embed ecological integrity and learning as core principles for sustainable tourism in parks. And they focused on attracting park visitors "to the right place at the right time, in the right numbers and with the right expectations" to ensure our parks were not "loved to death."

However, over the past decade, the focus of Parks Canada’s park management has shifted again – away from nature and conservation and towards tourism, marketing, infrastructure development – in response to budget cuts, an overwhelming focus on revenue generation, and a misguided belief that they needed new ways to attract visitors to our parks to keep them “relevant” to Canadians.

Moving beyond “balance”

In recent years, the problematic idea that national parks must “balance” conservation and development has re-emerged, even in the Agency’s communications, most recently in the 2016 State of Natural and Cultural Heritage Areas report.⁷ Balancing protection and development within our national parks is a recipe for the continuous “chipping away” of the natural habitats that park wildlife rely on, and for compromising ecological integrity through incremental development.

The concept of balance may apply to the broader landscape, where we need a balance between protected areas and developed lands to achieve sustainable development of the overall landscape. Achieving this balance requires that significant areas focus primarily on protecting nature (parks and protected areas), while other areas are sustainably developed. Together this provides the “balance” needed for nature, including people, to thrive.

After more than a century, it’s time to move beyond the idea that we could “balance” nature protection and development in our national parks, and still maintain them “unimpaired” in the long run, and put nature at the heart of everything we do in our beloved parks. From conservation to nature-based tourism to education, we believe that all actions should focus on the ultimate goal of improving the ecological condition of our national parks: keeping nature that exists now safe from harm, and restoring what’s been lost.

Funding Cuts:

In 2003 funding was allocated to implement the science and ecological integrity monitoring and reporting program which allowed the program to get up and running and scientists to be hired. However, within a few years this funding started to be whittled away, culminating in 2012 when one third of the Agency’s science and conservation capacity was cut.

These cuts have undermined the ability of the Agency to understand and report on the state of our parks, and to take action to maintain or restore their ecological integrity. The Fall 2013 Report from the federal Commissioner of Environment and Sustainable Development, concluded that with this decrease in science capacity:

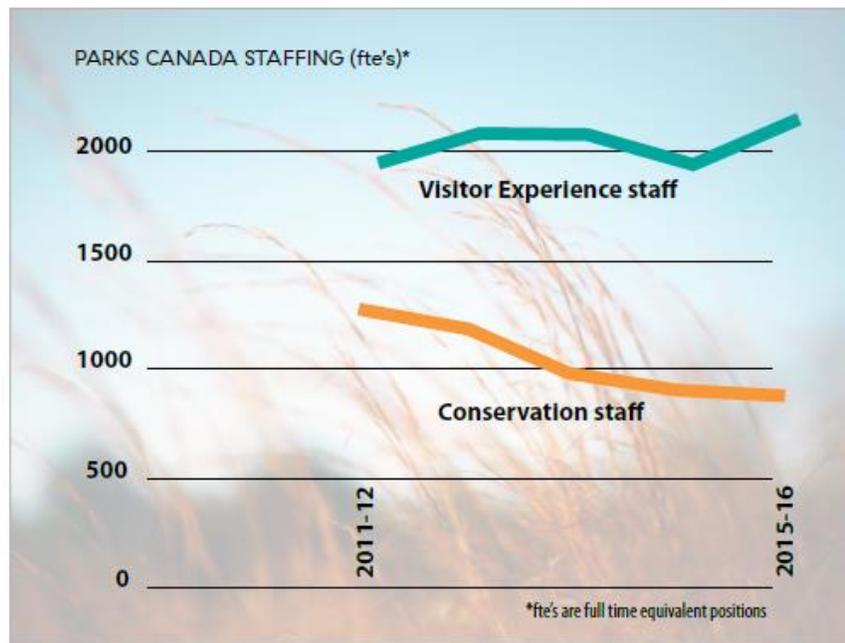
⁷ <http://www.pc.gc.ca/eng/docs/pc/rpts/elnhc-scnhp/2016/part-a.aspx>

“There is a significant risk that the Agency could fall further behind in its efforts to maintain or restore ecological integrity in Canada’s national parks.”

Parks Canada’s recently released 2016 “*State of Canada’s Natural and Cultural Heritage Places*” report found that almost half of national park ecosystems are in fair or poor condition, which is a sobering finding that highlights the need for more investment in science and conservation, as well as the urgent need for the Agency to re-focus on their primary mandate of nature conservation.

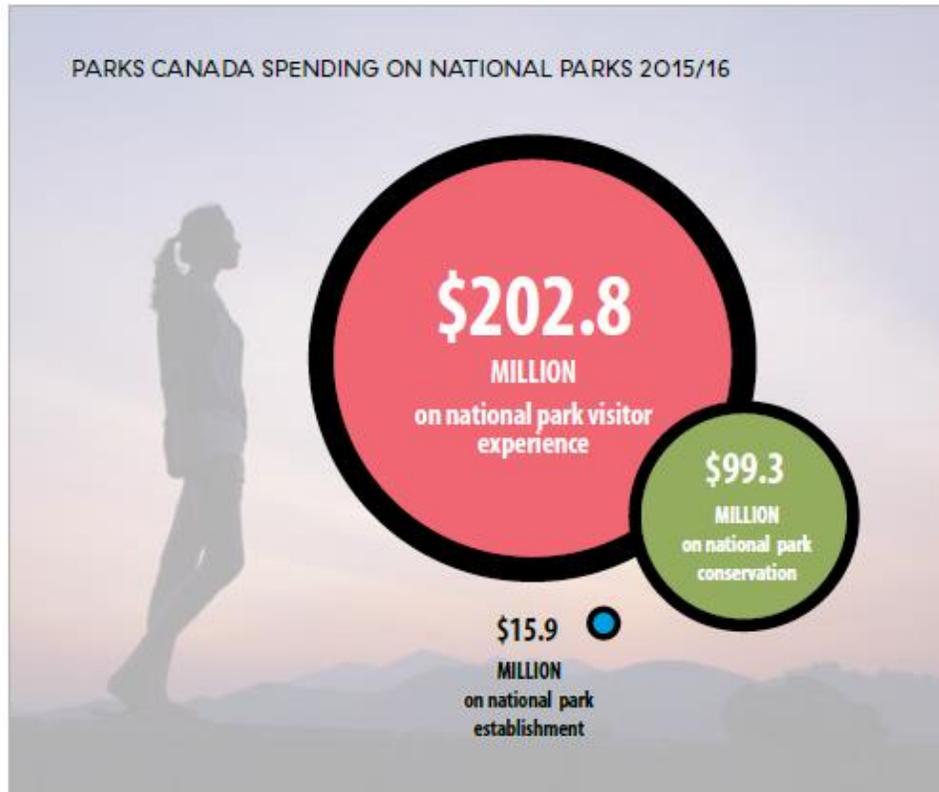
The Parks Canada report also claims that the ecological integrity monitoring program is now fully implemented. However, comparing the 2016 report with the previous 2011 state of parks report shows that the number of ecosystems included in the monitoring program was cut by almost 28% over this time period. Full implementation of the program was achieved through dramatically reducing its scope in response to budget cuts.

Recent funding cuts have affected conservation programs more than visitor experience programs, raising questions about what the Agency considers to be its “first priority.” The graph below shows staffing trends in Parks Canada’s Heritage Resources Conservation and Visitor Experience programs since the 2012 budget cuts. During this time period, the Agency’s Visitor Experience program staff grew by 9%, while the Conservation staff shrank by 31%.



Data from Parks Canada Reports on Plans and Priorities, 2011/12 to 2015/16 ²⁴

In 2015/16, spending on national parks conservation made up only 13% of Parks Canada’s overall budget, while approximately double this amount was spent on the visitor experience program.



Data from Parks Canada Report on Plans and Priorities, 2015/16 ²⁵

Parks Canada’s overall budget has grown in the past two years because of investments made by the federal government to upgrade infrastructure. In 2015, Parks Canada received funding of nearly \$3 billion to be spent over five years to address the maintenance backlog for park roads, bridges and dams, and visitor infrastructure in national parks, historic sites and canals. CPAWS is concerned that some of this massive infusion of resources may be used to build unnecessary infrastructure, or expand existing infrastructure rather than staying focused on bridges, roads, dams and other infrastructure that has fallen into disrepair: for example, to build the recently announced \$86M bike path proposal in Jasper. Ironically, at the same time that this new recreational infrastructure was announced, we were hearing considerable concerns raised by park users about the extremely poor condition of the *existing* backcountry trails and facilities in Jasper.

We recognize that, in some cases, repairing infrastructure can lessen its impact on park ecosystems, for example by installing fish-friendly culverts that re-connect aquatic ecosystems

or repairing existing trails to avoid trail braiding through sensitive ecosystems. However, this investment should not be used to expand infrastructure, nor does it restore the funding that is urgently needed for Parks Canada's ecological integrity monitoring and other science, conservation, interpretation and education programs, all of which are critical to delivering on the Agency's mandate.

At the operational level these budget cuts have also had an enormous impact, including a significant decrease in the ambition of conservation targets. For example, since 2005 Parks Canada's nationwide goal for restoring natural fire regimes in national parks has been reduced from 50% of the long-term fire cycle to only 20%. The 50% target was set after significant scientific debate and open consultation. The 20% target is based only on budget limitations. This is significant not only because it reduces the ecological integrity of fire-dependent ecosystems in parks, but also because it increases the risk of catastrophic wildfire.

Investing in conservation, interpretation and education programs, as well as enabling more "boots on the ground" to interact with and manage visitors should be the priority.

Implementing the platform commitment to restore funding for Parks Canada's ecological integrity science and monitoring program is critical to ensure the necessary information is available to deliver on the Minister's legislative mandate to maintain or restore the ecological integrity of our national parks as the first management priority. This re-investment could also support the integration of climate change considerations into park management, and help to better integrate Indigenous knowledge into the decision-making processes, consistent with Canada's reconciliation efforts.

The Demise of Public Reporting and Consultation

Public reporting on the state of national park ecosystems has declined over the past five years.

Public reporting on the state of park ecosystems is a core part of the management system for national parks in that it ensures that Canadians have access to information about what's going on in their parks, including progress or problems in their conservation. There is a legal obligation under the *Canada National Parks Act* for Parks Canada to table reports in the House of Commons every two years summarizing the state of the entire national park system. Yet the latest report tabled in December 2016 was almost four years overdue, with the previous report having been tabled in 2011. The release of the 2016 report is a positive step back towards public reporting, but there is still much more work to do to ensure transparency in this monitoring and reporting system.

At the park level, State of Park reports are supposed to be prepared in advance of management plan reviews for each park to help identify key issues that need addressing. In 2012, the *Parks Canada Agency Act* was amended to only require park management plans to be reviewed every

10 years instead of every five. This timeframe is far too long to address the quickly changing conditions facing our parks.

Since this legislative change was made, there has been only one new park-level State of Park report posted on the Parks Canada website. As of May 2016, State of Park reports were available for 20 of 46 national parks, with the most recent one dated 2012, and others dating back as far as 2004.⁸

We have been told by park staff that they are no longer required to produce full State of Park reports, instead just preparing “PowerPoint” presentations. So far these even these documents have not been made publicly available.

Currently, Parks Canada’s ecological monitoring data is not publicly available, although the Agency has told us that they are working to make their data public within a year. There are enormous benefits to transparency. For example, if data and reports are publicly available, academics and independent researchers are better able to pursue research relevant to park management, contribute to the knowledge base about our national parks, and help achieve conservation goals. We encourage the Agency to ensure all their ecological and social science data is made publicly available.

PARKS CANADA WITHHOLDING RESULTS OF MT. NORQUAY DEVELOPMENT MONITORING

Parks Canada’s Ecological Integrity Monitoring program includes two major elements: monitoring and reporting on the overall condition of park ecosystems, and on the impact of specific developments or management measures.

When Parks Canada approved a proposal from the Mt. Norquay Ski Area to open the hill to large scale summer use in important wildlife habitat, they included a condition that traffic on the access road to the hill must be reduced. This road runs through an important wildlife corridor at the narrowest, most crowded point in the Bow Valley. Parks Canada committed to monitoring road traffic to ensure compliance with this condition, yet after three seasons and in spite of repeated requests, no traffic information has been released to the public. This means Canadians have no idea whether the operator is meeting this important ecological condition or not, or if this expanded commercial operation is having a negative impact on sensitive park wildlife.

Opportunities for Canadians to have their say in decisions about our national parks have diminished dramatically in recent years. We have frequently been involved in public consultations on development proposals in parks that were limited to a few weeks of geographically restricted consultations, often after years of behind-closed-door discussions with private developers, and often after decisions appear to have already been made internally.

⁸ <http://www.pc.gc.ca/docs/bib-lib/docs5/docs5h.aspx>

In most cases, like the Lake Louise Ski Resort expansion and the Glacier Skywalk, proposals have been approved in spite of strong public opposition.

In the late 2000s, an “internal program review” was conducted that resulted in a fundamental shift in management direction for Parks Canada (see next section for detail) with no opportunity for the public to provide input. The outcomes of that review conflicted with existing policies that were crafted with significant public input.

Over the past decade, the Minister’s Round Table, which is legally required every two years under the *Parks Canada Agency Act* as a public accountability mechanism on the performance of Parks Canada, became tightly scripted events, focused almost entirely on how to increase park visitation, with little or no attention paid to ecological integrity objectives. CPAWS welcomes the shift in approach for this year’s Round Table and applauds the Minister for opening the dialogue up to all Canadians to ensure citizens can have a say in the future of our national parks and national marine conservation areas. However, even this year’s Round Table suffered as a result of Parks Canada providing tightly scripted themes and questions that did not address the performance of the Agency, as is required under the Act. However, in spite of these challenges, Canadians have rallied to clearly express their desire for the Agency to re-focus on nature conservation as the priority for park management.

To restore openness and transparency in all aspects of developing and implementing policies and plans going forward will require strong oversight and direction by the Minister, but is a critical step to restore public accountability, and ensure the Agency is delivering on their mandate and acting in the public interest.

Shifting Parks Canada Program Objectives:

In 2008, with no public involvement, Parks Canada initiated an internal “program renewal” that resulted in a significant shift in management direction, away from conservation and towards prioritizing visitors and tourism. We believe that this has contributed significantly to the Agency’s “mission drift” over the past decade. The Agency explains this exercise as follows:

In December 2007, the Agency began a project directed toward renewal of its programs in response to a number of external drivers for change (e.g., changing demographics, changing technology, changing leisure patterns, increased urbanization and increased national and international competition for tourist visits). In January 2009, the Agency officially rolled out its case for change and a new Vision Statement.⁹

This new vision statement is:

⁹ http://www.pc.gc.ca/docs/pc/rpts/rve-par/ep-2011-2012_e.asp#sectioni

“Canada’s treasured natural and historic places will be a living legacy, connecting hearts and minds to a stronger, deeper understanding of the very essence of Canada.”¹⁰

The statement includes no mention of ecological integrity or conservation in spite of it being the legislative first priority for national park management. The vision’s “roll out” presumably occurred inside Parks Canada since there is no record of a public announcement of the “case for change and new Vision Statement” in 2009.¹¹ Parks Canada already had a vision in its *Guiding Principles and Operational Policies* that was created with significant public input and which focuses on conservation leadership.¹² The new statement, created behind closed doors, is fundamentally different and should have been subject to broad public discussion if it was to be pursued at all.

After developing its new vision, Parks Canada moved to change the “strategic outcome” in its annual plan. Prior to 2008, the strategic outcome had been linked directly to Parks Canada’s mandate statement and included a strong conservation and learning focus:

“Protect and present nationally significant examples of Canada’s natural and cultural heritage, and foster public understanding, appreciation and enjoyment in ways that ensure the ecological and commemorative integrity of these places for the present and future generations.”¹³

The new “strategic outcome” downplays protection as the first priority and puts visitation up front, with much less emphasis on the core protection mandate. Again, this change was made with no public consultation:

“Canadians have a strong sense of connection, through meaningful experiences, to their national parks, national historic sites and national marine conservation areas and these protected places are enjoyed in ways that leave them unimpaired for present and future generations.”¹⁴

Parks Canada’s internal “program renewal” resulted in a fundamental shift in focus that continues to drive actions on the ground in national parks today, without addressing the views of Canadians and with a weakened link to Parks Canada’s legislative mandate. A review of this process and the resultant policy direction is needed to determine how to better align with the Agency’s legislative mandate.

¹⁰ <http://www.pc.gc.ca/eng/docs/pc/plans/rpp/rpp2013-14/sec01/sec01a.aspx>

¹¹ See Parks Canada Media Room for January 2009 at http://www.pc.gc.ca/apps/cp-nr/index_e.asp?year=2009

¹² <http://www.pc.gc.ca/eng/docs/pc/poli/princip/index.aspx>

¹³ <https://www.tbs-sct.gc.ca/ppg-cpr/dep-min2-eng.aspx?Dt=92>

¹⁴ 2008-2009 Report on Plans and Priorities, Parks Canada. Available at: <http://www.tbs-sct.gc.ca/rpp/2008-2009/inst/cap/cappr-eng.asp?format=print>

Retreating inside park boundaries:

Managing parks for ecological integrity requires regional cooperation. The previous federal government was reluctant to support projects that extended beyond federal jurisdiction. This made it much more difficult for national park staff to initiate partnership projects that extended beyond park boundaries into the broader landscape

Most protected areas in Canada are too small and isolated to protect nature on their own. They have become ecological islands, disconnected from other areas of natural habitat. What happens on the landscape outside our parks has a huge impact on the health of nature inside. Wildlife wander in and out of parks and rivers flow through them. Even Wood Buffalo National Park, which is the largest national park in Canada and one of the biggest in the world, is affected by hydroelectric dams upstream on the Peace River and oil sands development upstream on the Athabasca River, which has led to a UNESCO mission to examine whether the park should be placed on the *List of World Heritage In Danger*. Similarly, UNESCO has recommended that a buffer zone be created around Gros Morne National Park to safeguard its values from potential petroleum development in the area around the park. Yet, neither of these buffer zone recommendations is being implemented at this time.

In another example, the boundaries of Nááts'ihch'oh National Park Reserve, NWT were compromised at the time of its establishment by a last minute political decision which did not reflect the extensive wildlife science and consultation process that had been undertaken by Parks Canada over many years. As a result, critical wildlife habitat was omitted from the park, and left open for mineral development, including calving, post-calving and rutting areas for mountain caribou. One herd that is affected is the Nahanni herd which winters in Nahanni National Park Reserve downstream from Nááts'ihch'oh, and migrates into the headwaters area to calve and breed. There is a need to re-visit the boundaries of Nááts'ihch'oh National Park Reserve, in conjunction with the Sahtu Dene and Metis so that wildlife and water is better protected. There is also a need to immediately put in place a robust research and monitoring program for mountain caribou which range in and out of the national park reserves and are very likely to be impacted by mineral development and access roads within and adjacent the parks

The science is clear that parks need to be managed within the broader landscape to protect their ecological integrity. In the face of climate change this is all the more important because nature is on the move, shifting in response to changing conditions.

Managing parks in a greater ecosystem context requires collaborating with other levels of government, Indigenous peoples, local communities, NGOs, and industrial interests. Given the commitment of the new government to more collaboration and partnerships, we are hopeful that the recent inward-facing approach to park management will change.

To recap, there are a number of short term opportunities to broaden park management approaches to encompass the greater park ecosystem of Canada's World Heritage Sites, including:

1. working with local communities and the NL government to create a buffer zone around Gros Morne. Polling shows that there is overwhelming public support in NL for this idea.
2. Re-visiting the boundary of Nááts'ihch'oh National Park Reserve to protect critical wildlife habitat and the headwaters of the South Nahanni River in partnership with the Sahtu Dene and Metis.
3. Working with Mikisew Cree First Nation Alberta, BC, and others to better protect Wood Buffalo National Park, including responding to recommendations from UNESCO's monitoring mission.

There is much work to do to re-focus on ecological integrity in our national parks, and restore open, transparent decision-making in Parks Canada's work, and strong political leadership will be required. However, Canadians are passionate defenders of nature in our parks, and they will welcome this action to protect wildlife, wilderness and the public interest in our national parks, and to leave a legacy for the future that we can all be proud of.

Recommendations:

E. Re-focus on ecological integrity and restore open, transparent decision-making by:

1. Striking an independent expert advisory committee with a specific mandate to advise the Minister on fulfilling her legislative requirement to maintain or restore ecological integrity as the first management priority. This committee could meet at least bi-annually, and tackle issues such as:
 - a. Reviewing the ecological integrity monitoring and public reporting program to ensure its scientific rigour and transparency;
 - b. Guiding the establishment of a peer review process for Parks Canada's science program;
 - c. Reviewing policies and plans, including management plans, to ensure they are compatible with the ecological integrity mandate and subject to adequate public review;
 - d. Making recommendations on how to ensure visitor experience programs support ecological integrity goals; and
 - e. Reviewing potential perverse financial or other incentives in the management system that encourage inappropriate development, and recommending ways to encourage ecological incentives.

2. Providing clear Ministerial direction to all Agency staff at all levels that maintaining or restoring ecological integrity must be the number one priority in all aspects of park management;
3. Re-investing at least \$25M per year in park science, ecological monitoring and public reporting as per the government's election promise;
4. Restoring the requirement to review park management plans to every five years (instead of 10), and to produce State of Park reports for each park every five years that are peer reviewed and publicly available;
5. Making ecological and social science monitoring datasets publicly available by the end of 2017, and putting in place mechanisms to assure regular updates;
6. Integrating climate change considerations into all Parks Canada policies and plans; and
7. Actively pursuing opportunities to engage in conservation initiatives beyond park boundaries, for example creating buffer zones around Gros Morne and Wood Buffalo National Parks, both of which are World Heritage Sites whose protection is under scrutiny from UNESCO.

B. Limiting development in national parks

Commitments:

The mandate letter from the Prime Minister to the Minister of Environment and Climate Change includes direction to: ***Protect our National Parks by limiting development within them, and where possible, work with nearby communities to help grow local eco-tourism industries and create jobs.***¹⁵

This commitment is consistent with legislation, policies, and plans that were developed with broad public involvement, including the Canada National Parks Act, Parks Canada Agency Act, National Parks Policy,¹⁶ Outlying Commercial Accommodation Guidelines,¹⁷ National Park

¹⁵ Ministerial mandate letter, Minister of Environment and Climate Change, November 2015: <http://pm.gc.ca/eng/minister-environment-and-climate-change-mandate-letter>

¹⁶ Parks Canada Guiding Principles and Operational Policies. Available at: <http://www.pc.gc.ca/eng/docs/pc/poli/princip/index.aspx>

¹⁷ Parks Canada. 2007. Redevelopment Guidelines for Outlying Commercial Accommodations and Hostels in the Rocky Mountains National Parks.

Wilderness Declaration Regulations,¹⁸ and park management plans. Considered together, these laws and policy statements clearly support strict limits to development in national parks.

Background

Holding firm to legislation, policies and regulations that limit development is critical to send a clear signal to private developers that the rules put in place to protect our national parks will be adhered to. Allowing the current limits to be breached could open the floodgates to more development pressure, putting already stressed park ecosystems at further risk.

Banff and Jasper National Parks have always been at the epicenter of pressures for more commercial and recreational infrastructure development. Development in these parks is concentrated in valley bottom and alpine/sub-alpine habitats that are the most important for wildlife, and are also the most crowded with roads, townsites, railways, ski resorts, parking lots and other developments. Wildlife such as grizzly bears and caribou are struggling to survive in these areas, yet in spite of their precarious state, more and more developments are being approved that are chipping away at these critical habitats.

Adding to the development pressures, in 2012 the federal government repealed the *Canadian Environmental Assessment Act (CEAA 1992)* and replaced it with a new Act known as *CEAA 2012*. *CEAA 2012* removed the legislative requirement for Environmental Assessments (EAs) in national parks, leaving the conduct of an EA to the discretion of Parks Canada. In response to *CEAA 2012*, Parks Canada adopted a new policy framework for environmental reviews, but in the absence of the legal requirement, CPAWS has observed a significant drop in the quantity, quality, transparency, and accountability of the assessments.

Section 67 of *CEAA 2012* only requires Parks Canada to “make a determination” on whether a project in a national park is likely to cause significant adverse environmental effects. Since 2012 Parks Canada has NEVER concluded that a project proposed in a national park is likely to cause significant adverse environmental impacts, even major developments through critical wildlife corridors, into legally protected wilderness, and where proposals would explicitly harm endangered species listed under the federal *Species at Risk Act*, which Parks Canada is charged with implementing in national parks. We confirmed this finding through an access to information request that shows that, between January 1, 2013 and October 30 2016, ***Parks Canada determined that none of 1533 projects approved in that time were likely to cause significant adverse environmental effects under section 67 of CEAA 2012.*** This was despite evidence suggesting that some developments could be harmful. For more details on the

¹⁸ National Parks of Canada Wilderness Declaration Regulations: <http://laws-lois.justice.gc.ca/eng/regulations/SOR-2000-387/page-1.html>

demise of the environmental assessment process, as well as recommendations, see CPAWS submission to the Environmental Assessment Review Panel.¹⁹

A few examples of developments that have gained approvals in Banff and Jasper in recent years are described in detail below to illustrate the problems we are describing.

EXAMPLE 1: MASSIVE EXPANSION OF LAKE LOUISE SKI RESORT

In June 2015, the Lake Louise Ski Resort put forward a proposal that could see it double its ski area's capacity and operations, building more ski runs, lifts, parking, a new lodge, and water reservoirs. The Lake Louise ski resort is located in critical wildlife habitat in the heart of Banff National Park, and is home to many sensitive and endangered species including grizzly bears, wolverine, and lynx. Banff is part of the Rocky Mountain Parks World Heritage Site, which adds further responsibility to Parks Canada to deliver on Canada's international commitment to protect the "outstanding universal value" of Banff's wilderness on behalf of the entire world community.

Parks Canada quickly and quietly approved the Ski Area Site Guidelines in 2015, just days before the federal election was called, even though the Guidelines would allow commercial infrastructure development in a regulated wilderness area, where such development is currently prohibited by law. Astonishingly, Parks Canada and the ski resort continue to make the claim that massive expansion of the resort will result in a net environmental gain for the park because three wild, undeveloped areas would be removed from the ski area leasehold and designated as wilderness. However, CPAWS and other conservation organizations contend that the near doubling of capacity and infrastructure, the diversion of water for snow-making, and other developments proposed for the ski hill will inevitably result in a significant net environmental loss because of the massive increase in developed footprint. Parks Canada's claim has also been publicly refuted by a group of former senior Parks Canada managers, including a former Parks Canada Director General of National Parks, Superintendent of Banff, and Chief Ecosystem scientist.²⁰

If legally designated wilderness areas are allowed to be changed to accommodate private commercial development proposals, their purpose in providing secure long-term protection from development will be undermined and the door opened to more development proposals throughout our parks system, putting wilderness and wildlife at further risk.

EXAMPLE 2: OVERNIGHT ACCOMMODATIONS AT MALIGNE LAKE

¹⁹ See: http://eareview-examenee.ca/wp-content/uploads/uploaded_files/cpaws-submission-to-review-panel-dec-23.pdf

²⁰ <http://calgaryherald.com/news/local-news/former-national-park-managers-stand-up-against-lake-louise-expansion>

In 2014, the commercial tour operator that runs daytime operations at spectacular Maligne Lake in Jasper National Park proposed building an overnight resort along the shores of the iconic lake, even though park policies, including the park management plan, prohibit new commercial accommodation outside the park townsite.

After the release of an open letter by former senior Parks Canada staff opposing the proposal, and considerable opposition from CPAWS, the Jasper Environmental Association, and thousands of Canadians, Parks Canada rejected the proposed hotel but gave concept approval to 13 other elements of the resort, including a thatched “wildlife maze” in documented moose habitat and, more egregiously, high-end, commercial tent cabin accommodations. The proposal still contravenes the policy on commercial accommodation, and could put local wildlife, including an endangered and struggling caribou herd and grizzly bears, at unnecessary risk.

Historically, many of the hotels in Jasper and Banff started out as small cabins or tent cabins and gradually grew into large hotels. We are concerned that this development could be the “thin edge of the wedge,” opening the door to more commercial development at Maligne Lake and elsewhere.

EXAMPLE 3: NEW PAVED CORRIDOR IN JASPER

In March 2016, a new risk to Banff and Jasper emerged with the surprise announcement in the federal budget of \$66 million for a paved bike path in Jasper National Park. For months Parks Canada refused to share any information about this proposal. However, in late June 2016, the Agency confirmed in a media report that they plan to build a new paved corridor from Jasper to Lake Louise, through endangered caribou habitat and important grizzly bear feeding grounds. This proposal had never been publicly proposed, discussed or reviewed, and is not in the park management plan which is supposed to direct Parks Canada’s actions. Park management plans are developed with extensive public consultation and, once approved by the Minister, are tabled in Parliament as a commitment to Canadians about how parks will be managed on their behalf. Modifying management plans requires an equivalent level of public consultation. Parks Canada has now announced that there will be a public consultation and environmental assessment on the bike path, and admitted that the price tag is closer to \$86 million. CPAWS believes that this project should never have been considered given it is out of step with policy, legislation and the federal government’s commitment to limit development in our national parks.

CPAWS is also concerned that Parks Canada is redirecting some of the \$3 billion of federal infrastructure funding that is intended to address the Agency’s existing infrastructure maintenance backlog towards developing new recreational infrastructure in national parks, even when it contravenes the Agency’s own legislative mandate and policies.

We also note that Parks Canada is misleading the public about this project. In a recent news release the Agency stated that "the project is based on the Icefields Parkway Strategic Concept" and that it is part of the Jasper National Park management plan.

The Icefields Parkway Strategic Concept only states that Parks Canada will:

Review the needs of cyclists and develop options. Explore options to enhance opportunities.

To date, no options to enhance opportunities for cyclists have been presented to the public or stakeholders for discussion. For example, there is no evidence that the Agency considered widening the shoulder on the existing Icefields Parkway, or examined options for bike paths to link gateway communities to the parks as alternatives.

There is also no mention of the project in the Jasper National Park Management Plan.

Flawed Decision-making Processes

The current decision-making processes that guide development decisions, particularly in Banff and Jasper, are convoluted and ineffective in that they are enabling developments that contravene park policy and legislation. Recent decisions to approve ski area guidelines and long range plans, the Glacier Skywalk, Maligne Lake Resort and announce the proposed bike path in Jasper are all examples of the failure of these processes to respect park policy and legislation, and to be open, transparent and evidence-based. From a public perspective, it is impossible to understand what these processes entail, and they are clearly not delivering results that are in the public interest. They urgently need to be reviewed and fixed to ensure they are open and transparent, evidence-based, and effective in protecting the ecological integrity of the parks from incremental development.

The process for managing existing downhill ski areas illustrates the problem. The *Canada National Parks Act* prohibits the development of new ski areas, but allows existing areas to continue within strict legally defined boundaries. These areas are managed according to the 2006 Ski Area Management Guidelines, which set up a multi-stage development approval process that was supposed to establish permanent limits on ski areas, similar to what has been done for park townsites and outlying commercial accommodations. Unfortunately, this policy process is instead being used to rationalize massive expansions of ski areas and their use.

The process itself sets up a conflict of interest, where Parks Canada acts as both proponent and regulator. In the case of Mt Norquay and Lake Louise ski resorts, Parks Canada worked behind the scenes with the proponents for several years before releasing a joint proposal that included major expansion of use and/or footprint, then held an extremely brief and geographically limited public consultation process that was inadequate and lacked transparency. They then essentially ignored the public input that was received. In both cases, Parks Canada became a

proponent for proposals that were developed without public input, and that were subsequently approved, in spite of significant public opposition. The public interest and ecological integrity were both undermined.

The ski area management process was developed based on the assumption that rigorous environmental assessments would be conducted under the Canadian Environmental Assessment Act (1992). This is an integral part of the policy framework. However, as previously mentioned, in 2012, the requirement for comprehensive studies was removed when *CEAA 1992* was repealed, and replaced with a Parks Canada policy that has been weakly applied.

Clearly there is a need to better adhere to the policies and regulations that have been put in place to limit development in national parks. There is also an urgent need to review and fix the decision-making processes that are allowing decisions to be made that contravene these rules.

Recommendations:

B. Deliver on the government's commitment to limit development in national parks by:

1. Commissioning an independent review of Parks Canada decision making processes, particularly in Banff and Jasper National Parks, to deliver on the Minister's legislative mandate to protect ecological integrity and commitment to open, transparent decision-making in the public interest. Currently these processes are enabling infrastructure developments to proceed even where they contravene policy and legislation;
2. Publicly committing to no expansion of the development footprint in Banff and Jasper National Parks. This will require stopping the proposed expansion of the Lake Louise Ski Resort, the proposed new bike path through endangered caribou and grizzly habitat in Jasper, and the resort that was proposed at Maligne Lake in Jasper; and
3. Restoring a legal requirement for the highest standard of environmental assessment for all projects in national parks and national marine conservation areas. For more detailed recommendations, see CPAWS submission to the Environmental Assessment Review Panel.²¹

²¹ For CPAWS detailed recommendations to the Environmental Assessment Review Panel, see: http://eareview-examenee.ca/wp-content/uploads/uploaded_files/cpaws-submission-to-review-panel-dec-23.pdf

For Guidance on Environmental Assessments in World Heritage Sites, see:

https://cmsdata.iucn.org/downloads/iucn_advice_note_environmental_assessment_18_11_13_iucn_template.pdf

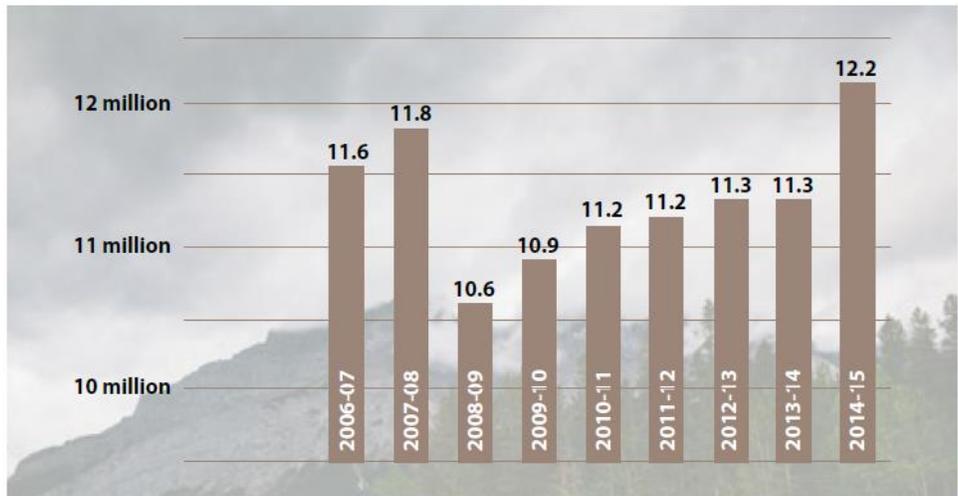
C. Focus on nature-based visitor experiences and supporting ecotourism in gateway communities

CPAWS believes there is a fundamental problem with the assumptions upon which Parks Canada has built its current visitor experience program. For almost a decade, the Agency’s “narrative” has been that there is a crisis in visitation, our parks are no longer relevant to Canadians, and there is a need to provide more infrastructure-focused and adrenaline-charged events, as well as mass competitive events, to attract people to our parks. This was reinforced by shrinking budgets and a drive to prioritize revenue generation above all else. The problem with this narrative is that it is based on false assumptions. Visitation did drop around 2008 when this new approach to marketing and visitor experience was getting off the ground. But the drop had little to do with irrelevance. It was tied directly to the global economic downturn.

The data we examined shows that, overall, national park attendance has shown relatively steady growth over the past 15 years, with drops in visitation occurring only after global security and economic crises, like the terrorist attacks of September 11, 2001, and the global economic downturn in 2008. In the past two years since the Canadian dollar has dropped in value relative to the US dollar, visitation to many national parks has skyrocketed.

This suggests that the massive investment in marketing Parks Canada over the past decade has had little influence on visitation trends, which are influenced in large part by global conditions. This funding would have been better used to support nature-focused stewardship and education programs.

Evidence also suggests that national parks are still very “relevant” to Canadians. Polling shows that Canadians continue to value our national parks as one of the top four symbols of Canadian identity along with Charter of Rights and Freedoms, health care and the flag, and this has not changed for decades. Parks Canada’s own data shows that Canadians value unspoiled nature and wildlife above all else in their national parks.



National Park visitation, 2006-07 to 2014-15²²

Our vision for a visitor experience program in national parks and other protected areas, is that all actions, whether they be in conservation, visitor experience or education programs, be focused on the ultimate goal of improving the ecological state of our national parks. This means that experiences offered and encouraged in our national parks would focus primarily on nature-based experiences, education, stewardship and Indigenous culture. Through these programs, Canadians would come to value and understand the life-giving, inspiring and healing force of nature, and the important role our protected areas play in conserving these values for the future.

Re-focusing Parks Canada clearly on this vision, and ensuring they do not stray from it through a desire to maximize visitation and revenue, is, in our view, the best path to successfully nurturing a culture of conservation in Canada, and ensuring the future well-being of our parks, and of the Canadians who visit them.

Parks Canada already has some programs that are focused on facilitating nature-focused experiences. For example, the Learn to Camp program (which received more funding in budget 2016), bioblitzes, remaining interpretation programs, and citizen science programs are all positive initiatives aligned with this vision. Building on this foundation, we suggest that the Agency needs to develop a new strategy that clearly focuses on and invests in encouraging these kinds of rich, in-depth nature experiences, and stops supporting commercial mass recreational events that use the park as a backdrop, but have little connection with nature, as well as activities that require extensive built infrastructure.

²² Graph from CPAWS report; Data from Parks Canada Attendance Reports:
<http://www.pc.gc.ca/eng/docs/pc/attend/table3.aspx>

Unfortunately, the Agency's education and personal interpretation programs have been dramatically cut in recent years, in spite of increased budgets for visitor experience overall, so there are fewer staff on the ground to deliver inspiring nature-focused programs.

A new plan is needed, based on evidence, and developed through an open, transparent process, with clearly articulated goals and objectives linked to the ultimate end-goal of conserving nature. This should include re-building personal interpretation and education programs. While additional funding needs may be identified, there are likely opportunities to shift funding from existing marketing and promotion programs and support for non-nature-related activities.

Given that visitation across the national parks system has risen dramatically, now is also a good time to look at opportunities for public transit systems to travel to and within national parks that are reasonably close to urban centres. Done right, this could alleviate traffic, reduce pressure on wildlife, and contribute to climate change solutions.

Recommendations:

1. Focus on nature-based visitor experiences in national parks:

1. Through an open, transparent process, creating a national park visitor experience strategy that prioritizes nature-based activities rather than infrastructure-based or mass recreational activities, and which emphasizes interpretation, education and stewardship programs delivered by staff on the ground; and
2. Creating a public transportation strategy for national parks to alleviate traffic and crowding, and to support climate change mitigation. This should include enhanced public transit to and within parks.

2. Expanding Canada's protected areas systems

Commitments:

CPAWS welcomes the federal government's commitments to create new national parks and national marine conservation areas (NMCA's), as well as commitment to deliver on Canada's international targets of protecting at least 17% of land and inland waters and 10% of coastal and marine areas by 2020, and go substantially beyond these 2020 targets.

Meeting international targets:

Federal leadership is needed to ensure all governments work together, along with civil society, private landowners, academics and other partners, to collaboratively achieve our protected area targets. We are pleased that Parks Canada is stepping forward to co-chair the Pathway to Target 1 process, and look forward to fully engaging in supporting this effort to meet our 2020 targets as a next step, as we look beyond to define long term science-based targets reflective of what's needed to conserve nature in the long term. We are also working with government officials, including Parks Canada, to meet our marine protected areas targets.

In July 2015, CPAWS released a status report called *Protecting Canada: Is it in our nature?* This report provides a detailed analysis of how Canada is doing relative to our commitments.²³ We have also released a series of reports on the status of marine protected areas in Canada.²⁴ These reports contain detailed background on Canada's efforts to establish terrestrial and marine protected areas and provide recommendations for how we can meet our targets.

Overall, Canada is lagging well behind most other countries with only 10% of our landscape and less than 1% of the ocean protected, and we urgently need a plan to scale up our protected areas systems. As a country, we have one of the best opportunities in the world to achieve large-scale protection of our land, freshwater and ocean ecosystems.

National Parks and NMCA's should be a core part of this effort.

Parks Canada has two important roles to play in this effort:

1. Leading a nation-wide effort with provincial, territorial and Indigenous governments, civil society and other partners to achieve the 2020 targets, including support for systematic conservation planning to identify priority areas for protection, and ensuring we look beyond 2020 to the protection needed in the long term to conserve nature.
2. Creating new national parks and national marine conservation areas, and ensuring our existing ones are effectively managed.

Working with Indigenous governments, through a nation-to-nation relationship, presents perhaps the biggest opportunity to scale up our protected areas systems in Canada.

National Parks:

Canada has a long-standing plan to complete a system of national parks that includes at least one park in each of the country's diverse landscapes. While the current system plan has been useful in guiding the creation of national parks for over 40 years, it does not reflect up-to-date conservation

²³ http://cpaws.org/uploads/CPAWS_Parks_Report_2015-Double_Page.pdf

²⁴ See, for example, http://cpaws.org/uploads/CPAWS_DareDeep2020_final.pdf .
http://cpaws.org/uploads/CPAWS_DareDeep2015_v10singleLR.pdf

science, climate change considerations like connectivity, or governance and co-management opportunities. By 2020 we are recommending that Parks Canada create new national parks to complete the current system plan, and develop a new plan to guide national park creation for the next several decades. At the same time there are also opportunities to expand existing national parks to better reflect ecological needs, for example in Nááts'ihch'oh National Park Reserve.

National Marine Conservation Areas:

The Canada National Marine Conservation Areas Act states that:

4 (1) *Marine conservation areas are established in accordance with this Act for the purpose of protecting and conserving representative marine areas for the benefit, education and enjoyment of the people of Canada and the world.*

The Act goes on to describe the sustainable management and use of the area, and states that:

(3) *Marine conservation areas shall be managed and used in a sustainable manner that meets the needs of present and future generations without compromising the structure and function of the ecosystems, including the submerged lands and water column, with which they are associated.*

Although the Canada National Marine Conservation Areas Act was passed in 2002, to date efforts to advance the NMCA system have been extremely slow, with only 2 NMCA's created under the Act since it was passed 14 years ago, and only 4 sites currently underway or in discussion²⁵. Current funding levels for the NMCA program are woefully inadequate.

Parks Canada has not developed the policies needed to ensure the full implementation of the Act, for example, policies related to key terms in the Act, such as "ecologically sustainable use", as well as policy on zoning schemes for NMCAs have still not been developed.

To provide effective protection for these marine areas, CPAWS believes that the NMCA Act should be reviewed and updated to better reflect the evidence of the importance of extensive "no take" areas to provide effective protection in the marine environment. The overemphasis on sustainable use as an objective for NMCAs, is allowing extensive commercial fishing to continue, and undermining the degree to which NMCAs can contribute to the conservation of biological diversity. The science is clear that areas require strict protection, including from fishing, to effectively achieve their biodiversity goals.

Unlike the National Parks Act, the NMCA Act does not include maintenance and restoration of ecological integrity as the priority management goal. This is a significant weakness. In fact, it is

²⁵ Lancaster Sound, NU; Southern Strait of Georgia, BC; les Iles de la Madeleine, QC; and Tawich, QC/NU (James Bay), and western Hudson Bay.

our view that NMCAs, except for zones that are fully protected, do not meet the IUCN definition of a protected area, which requires conservation to be the primary objective.

Our recommendations focus on speeding up the establishment of NMCA's, strengthening the legislation, and completing a suite of policies to support its implementation.

Recommendations:

D. Expand Canada's protected areas systems by:

1. Completing all currently proposed national parks by 2020.²⁶
2. Creating a new system plan for national parks by 2020 that reflects up-to-date conservation science and Indigenous knowledge, integrates climate change considerations, and embraces the opportunity to work with Indigenous governments to create and manage protected areas;
3. Incorporating protected areas into national climate change plans to reflect their value as "natural solutions";
4. Co-leading and supporting Canada's nationwide effort to protect at least 17% of the landscape by 2020 through the Pathway to Target 1 process, including providing support for systematic conservation planning;
5. Providing adequate levels of funding to complete the current representative national park system and create a new national park system plan by 2020; and to complete the representative NMCA system by 2030;
6. Completing proposed NMCA's and identifying new sites to contribute to protecting at least 10% of our ocean by 2020, and then going substantially beyond to what's needed to conserve nature. Site selection and design must reflect the quality measures in the international targets, as well as the percent target;²⁷
7. Reviewing and updating the NMCA Act to provide stronger protection for biodiversity, including adding ecological integrity as the primary management objective, as is the case for national parks.

²⁶ Current National Park proposals include: Thaidene Nene, NWT; South Okanagan-Similkameen, BC; Flathead Valley, BC; Manitoba Lowlands, MB; and Northern BC/Southern Yukon (Parks Canada Region 7).

²⁷ NMCA opportunities include: Lancaster Sound, NU; Southern Strait of Georgia, BC; les Iles de la Madeleine, QC, Tawich, QC, Bay of Fundy, NB/NS; South Coast Fjords, NL.

8. Prioritizing the development of policies and regulations to enable implementation of the NMCA Act, including a zoning framework and scientific guidance for no take areas (ie. 30%).
9. Leading a nation-wide effort to plan for the much larger scale protection needed beyond 2020 to conserve nature in the long term, based on science and Indigenous knowledge.
10. Leading an initiative, in partnership with Indigenous governments, to explore what policy and legislative changes are required to support the establishment of Indigenous Protected Areas, created and managed by Indigenous governments, or truly co-managed with public governments, on land and in the ocean.