

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

October 30, 2020

The Canadian Parks and Wilderness Society (CPAWS) is pleased to participate in the 2020 Minister's Round Table on Parks Canada and to share our recommendations to help guide the Minister and Parks Canada in delivering on their responsibility to maintain and restore ecological integrity as the first priority of the Minister in all aspects of parks management.

We are at an unprecedented moment in time, not only because of the COVID-19 pandemic, but also because the biodiversity crisis is finally being recognized as an existential threat to the future of humanity commensurate with climate change. Global organizations like the World Economic Forum and the World Health Organization are now reinforcing urgent calls for action to reverse nature's precipitous decline. The evidence is clear that we need to protect and restore between 30 and 70% of our land and ocean to sustain a healthy planet. We are delighted that the Canadian government has made strong and ambitious commitments to protect 25% of land and ocean by 2025 and 30% by 2030 and has recently joined the High Ambition Coalition, Global Ocean Alliance, and signed the Leader's Pledge for Nature to champion ambitious action on nature conservation nationally and internationally.

This global and national momentum presents an important opportunity for Parks Canada to develop an ambitious strategy to help achieve these commitments by contributing to well-designed and effectively managed networks of protected areas on land and in the ocean in all regions of Canada. This is also an opportunity for Parks Canada to play a leadership role in encouraging and incenting conservation action on the broader land and seascape and across jurisdictional boundaries.

We offer the attached recommendations with this context in mind. Please feel free to contact us if you have any questions, or to discuss our recommendations. We look forward to your response within 180 days as the next step in the Minister's Round Table consultation process.

Sincerely,



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CPAWS Recommendations to the Minister's Round Table:

Our recommendations to the Round Table are intended to support the Minister in implementing his legislative mandate as well as the federal government's conservation commitments as outlined in the mandate letters (December 13, 2019), Speech from the Throne (September 23, 2020) and international commitments (September 28, 2020).

We have **identified the following six priority recommendations for the Minister:**

1. Establishing more national parks and NMCAs to help deliver on Canada's commitment to protect 25 percent of land and ocean by 2025 and 30 percent by 2030.
2. Taking a leadership role in managing land and ocean beyond protected area boundaries to support ecological integrity within the parks and to ensure wildlife can safely move through the broader land and seascape.
3. Maintaining and restoring ecological integrity as the first priority for managing national parks and NMCAs, including by prohibiting infrastructure and activities that pose threats to wildlife, and committing to developing data-informed human use strategies for all sites.
4. Continuing to pursue opportunities to work with Indigenous peoples to co-create and co-manage national parks and NMCAs.
5. Establishing a network of National Urban Parks and NMCAs across Canada to protect and restore significant ecosystems in urban landscapes, help connect Canadians to nature, and build support for conservation efforts.
6. Continue working with experts and stakeholders to improve diversity, inclusion, and accessibility effectively and without compromising ecological integrity.

Below we provide more detail about our priority recommendations and additional comments on the overall engagement process and organization of the Minister's Roundtable.

Recommendation 1. Parks Canada needs to significantly ramp up efforts to establish more national parks and NMCA(R)s to deliver on Canada's commitments to protect 25 percent of land and ocean by 2025 and 30 percent by 2030.

To achieve these ambitious targets with meaningful protection and in partnership with Indigenous Peoples, we recommend that Parks Canada take the following steps.

- a. **Complete all currently proposed national parks and NMCAs by 2022.**
This includes South Okanagan-Similkameen National Park Reserve (NPR), Hog Island/Sandhills NPR, and the Southern Strait of Georgia National Marine Conservation Area Reserve.
- b. **Build on the system plan for national parks by publicly releasing by end of 2021 a new plan/policy statement for new national parks that**
 - sets a measurable and ambitious goal that goes well beyond establishing one national park per natural region;
 - embraces the opportunity to work with Indigenous governments to create and manage protected areas;

- reflects up-to-date conservation science and Indigenous knowledge, and
 - integrates effective measures to address climate change.
- c. **Deliver on the commitment to establish new NMCAs in all 24 marine ecoregions and take a leading role in the protection of Canada’s ocean.**
 At present 2% of Canada’s oceans is protected within established Marine Parks or marine NMCA(R)s and existing protections cover just 5 out of 24 marine ecoregions (excluding the Great Lakes). Completing proposed NMCA(R)s would protect another 5 marine ecoregions. Efforts need to be considerably ramped up to improve coverage and complete a comprehensive network of NMCA(R)s.
- d. **Work to incorporate protected areas (land and ocean) into national climate change plans to reflect their value as “natural solutions”.**
- e. **Secure adequate levels of funding by 2021 to deliver on protected areas commitments and increase capacity both in Ottawa and regionally to support planning and establishment of new National Parks and NMCA(R)s.**
 Currently most national parks and NMCAs take upwards of 10 years to complete, from AOI to management planning. Although engagement with Indigenous Peoples and provincial governments takes time and needs to be done respectfully, we also observe that there are instances where Indigenous partners are ready to move more quickly and capacity issues within PCA have been the cause of delays. Increased capacity to support establishment processes is critically needed, especially regionally, to prevent bottlenecks and delays. To achieve this, PCA needs to build capacity for new park establishment that is commensurate with the government's commitment to protect 25% by 2025 and 30% by 2030.

Recommendation 2. Take a leadership role in managing land and ocean beyond park boundaries to support ecological integrity within the parks and to ensure wildlife can safely move through the broader land and seascape.

Protected areas are the cornerstones of nature conservation and provide the best means to maintain intact ecosystems. However, fragmentation of the surrounding landscape and seascape puts pressure on the ecological systems maintained by a protected area, which is further aggravated by climate change. Many animals and plants range beyond protected area boundaries and face barriers to movement or population-level threats on fragmented lands adjacent to protected areas. Given these conditions, protected areas alone are not enough - the management of surrounding landscape and seascape and the connectivity between and within protected areas are fundamental to effective biodiversity conservation. Therefore, it is imperative that Parks Canada not only manage to maintain and restore ecological integrity and connectivity inside protected areas, but also that they play a leadership role in encouraging and incenting conservation action on the broader land and seascape, across jurisdictional boundaries.

- a. **Leadership at the park level in managing the broader ecosystems around national parks and NMCA(R)s in ways that support the ecological integrity of the parks.**
 In October 2020, the Maligne southern mountain caribou herd was extirpated in Jasper National Park. Although benefitting from access to Jasper’s protected habitat, the herd was severely impacted by the unfavorable land management decisions on the surrounding landscape. The destruction of the herd’s winter habitat through industrial development had significantly shrunk its range, forcing the herd to stop migrating and to reside permanently within the national park. Combined with other factors, including other land-use impacts that carry over into the park, the herd was eventually pushed past the point of no return.

The Maligne herd's extirpation is a clear and very recent example of the important role the surrounding landscapes play in maintaining the ecological integrity of protected areas. The fate of other southern mountain caribou herds also hangs in the balance. In the marine environment, species like the Gulf of St. Lawrence beluga whales can range beyond protected areas boundaries and activities outside of park boundaries, such as vessel traffic can cause fragmentation and disturbance, threatening their populations. There is a leadership void within the federal government on broader landscape management and connectivity which presents an opportunity for Parks Canada to demonstrate leadership, including by convening partners, providing expertise, and supporting implementation through funding.

b. Connectivity work at Parks Canada follows international standards and best practices and builds on existing national research and expertise.

We recommend that Parks Canada:

- Support the application of international (IUCN) standards and guidelines for work on ecological connectivity and adopt IUCN definitions for ecological networks and corridors. According to IUCN, an ecological corridor is a “clearly defined geographical space that is governed and managed over the long term to maintain or restore effective ecological connectivity.”¹
- Adopt the “three global conditions framework” to help guide action on connectivity: focusing on habitat restoration in the south of the country, networks of protected areas and OECMs identified through regional spatial planning in the middle, and proactive spatial planning in the north to maintain large intact ecosystems with limited and well-designed developments that do not compromise the ecological integrity of the broader landscape (a reverse matrix approach).
- Continue to engage with the ECCC-led Pathway to Target 1 Connectivity Working group on the extant work on ecological connectivity in Canada. Research and reports produced by this group are providing an excellent basis for Parks Canada's own focus on ecological corridors. This work includes research on barriers and solutions to achieving connectivity in Canada, national-scale structural connectivity indicators (separate terrestrial and freshwater), and a connectivity toolbox.
- Examine the applicability of the U.S. Landscape Conservation Cooperatives model in the Canadian context.

c. Look beyond site-by-site establishment of individual NMCA(R)s and engage in seascape level planning, including MPA networks and Marine Spatial Planning, that addresses connectivity and supports climate change adaptation.

Parks Canada needs to take a stronger role in these processes to ensure that NMCA(R)s are a core feature of effective network and spatial plans that protect both ecological and cultural features, support reconciliation, and provide benefits to coastal communities. The NMCA zoning policy provides a useful tool to address connectivity and protected area planning at a seascape scale.

Recommendation 3. Maintaining and restoring ecological integrity is the first priority for managing national parks and NMCAs. This means prohibiting infrastructure and activities that threaten wildlife and ecosystems and developing human use strategies that support accessibility within the ecological context of the land and

¹ Hilty, J.*, Worboys, G.L., Keeley, A.*, Woodley, S.*, Lausche, B., Locke, H., Carr, M., Pulsford I., Pittock, J., White, J.W., Theobald, D.M., Levine, J., Reuling, M., Watson, J.E.M., Ament, R., and Tabor, G.M.* (2020). Guidelines for conserving connectivity through ecological networks and corridors. Best Practice Protected Area Guidelines Series No. 30. Gland, Switzerland: IUCN.

seascape while mitigating impacts for all sites.

a. Take a firm stand on limiting development in national parks.

In 2017 the Minister committed to limiting commercial development in Banff and Jasper National Parks. We commend Parks Canada for rejecting a proposal from Liricon Capital Limited for building a gondola (aerial tram) to the summit of Mount Norquay and associated developments in the Town of Banff and areas outside of the Mt. Norquay ski area lease boundaries in January 2020, as well as rejecting the proposal for a new paved recreational corridor from Jasper to Banff in 2019. At the same time, Parks Canada recently approved a massive expansion of Lake Louise Ski Hill. The ecological impacts of this expansion remain unclear but could be significant. A firmer stand is needed to limit commercial development in Canada's iconic Rocky Mountains national parks, which are suffering from the cumulative effects of development pressures coupled with overtourism.

b. Prevent overuse of parks and sensitive sites within them by developing and implementing a visitor use management strategy.

Managing overtourism in national parks can not only help address ecological impacts but can also improve visitor experience by defining a diversity of experiences that fit within the ecological context of the land or seascape. Visitor use management strategies should be informed by interdisciplinary and multidisciplinary data sources; ecological, social, and cultural sciences will best inform a robust multi-pronged strategy. Taking an evidence-based approach will require Parks Canada to reinvigorate its social science capacity at both the national and regional levels to more accurately study and manage for visitor experiences that meet social, cultural, and ecological objectives. This will require an adaptive management approach to visitation that allows for people to receive the optimal park experience without compromising the ecological integrity of national parks or NMCA(R)s.

c. Maintain and strengthen the current protection levels and prohibitions afforded under the *Canada NMCA Act* and implement the minimum protection standards for MPAs.

Scientific studies have repeatedly demonstrated that strongly protected and well managed MPAs provide considerable benefits to biodiversity producing more, larger and more diverse marine life and knock-on benefits for fisheries and tourism. Conversely, weakly protected MPAs at best may prevent further biodiversity decline but will not support any sort of recovery. In April 2019, Minister Wilkinson (as Minister of Fisheries and Oceans Canada) announced Minimum Protection Standards for all federal MPAs, including NMCAs, which prohibit oil and gas, mining, dumping and bottom trawling. The government committed to implement these standards for all new marine protected areas and eventually review all existing sites. It is imperative that Parks Canada works with federal, provincial and Indigenous government agencies to ensure that all harmful activities and human uses are identified and appropriately managed in a way that supports conservation and ecological integrity.

d. To improve transparency in Parks Canada plans and operations and eliminate science and reporting gaps, we recommend:

- Setting up a standing independent advisory committee to advise the Minister on an on-going basis (between the "every two year" Minister's Round Tables). This committee could help him/her implement an ambitious forward agenda for Parks Canada while also maintaining strong management standards for existing parks and ensuring EI is the first priority.
- Ensuring adequate on-going (A base) funding for Parks Canada's ecological integrity science and monitoring program 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.

- Reviewing and enhancing the ecological integrity monitoring and public reporting program and ensuring the results are publicly available and easily accessible.
- Reinvesting in a social science program - both at the national and regional levels of the Parks Canada Agency. Conducting adequate, scientifically robust visitor experience research and monitoring is critical for improving the visitor experience in parks and ensuring ecological integrity is maintained or restored.
- Implementing the Minister's promise (from 2017) to review Park Management Plans every five years. Reviewing plans every 10 years is inadequate to implement an adaptive management framework in this era of rapid change.
- Reintroducing State of Park reports for each park every five years that are peer reviewed and publicly available (also promised in 2017 and not fulfilled).

e. Implement in an efficient and timely manner the entire Action Plan for Wood Buffalo national park, as required by UNESCO.

Wood Buffalo National Park and World Heritage Site is facing a number of unmitigated threats of increasing upstream industrial development. The World Heritage Committee has been petitioned by a multi-stakeholder group, including CPAWS, to inscribe it as a site "In Danger". In order to ensure the Outstanding Universal Value of Wood Buffalo National Park is maintained, the World Heritage Committee had tasked Canada with the drafting and implementation of an Action Plan for the Park. Parks Canada is the agency charged with coordinating collaboration between federal, provincial, territorial and Indigenous governments. By December 1, 2020, Parks Canada will also be reporting back to the World Heritage Committee on the status of the conservation of the Park, which should include updates on the assessment, mitigations and compliance measures implemented to address the threats from upstream industrial projects. Despite progress being made on the Action plan implementation, significant portions of the Plan are falling behind. Moreover, the funding allocated for the plan implementation will not be sufficient to adequately complete all the 142 listed actions. Parks Canada should play a leadership role to ensure that the plan actions are implemented in a timely and efficient manner by all responsible parties.

Recommendation 4. Continuing to pursue opportunities to work in partnership with Indigenous peoples to co-create and co-manage national parks and NMCAs.

CPAWS recognizes Parks Canada support for Indigenous-led conservation and the unparalleled progress it has made on co-creation and co-management of protected areas with Indigenous Peoples in Canada. However, the selection of areas of interest for new national parks has, primarily, been carried out through a Parks Canada framework based on their System Plan, designed almost 50 years ago. The current System Plan does not reflect Indigenous knowledge and perspectives. To ensure this process is truly inclusive and reflective of Indigenous knowledge and views from the outset, Parks Canada should look beyond their current System Plan and build Indigenous interests and knowledge into the identification of potential new protected areas.

Parks Canada could be a leader in considering science and Indigenous knowledge in park establishment and management, and in creating "ethical spaces" where Indigenous and non-Indigenous peoples can gather and learn from each other, and find a greater understanding and a better path forward for managing our land and ocean. In addition, CPAWS encourages Parks Canada to maintain an openness to work with Indigenous people outside of protected areas establishment and management processes and whenever this is possible and feasible in

the spirit of Reconciliation.

Recommendation 5. Establishing a network of National Urban Parks and NMCAs across Canada that helps to protect and restore significant ecosystems in urban landscapes, connect Canadians to nature and builds support for conservation efforts.

National urban parks and NMCAs present an exciting new model for engaging with urban communities across Canada and facilitating easy access to nature. These parks can make an important contribution to nature conservation in urban areas, and also serve as a gateway to the National Park system for many Canadians, which can help inspire them to support nature conservation elsewhere within the country. The demand for accessing nature has increased significantly in 2020 and National urban parks are well positioned to absorb some of this added demand. This also helps alleviate pressure on national parks and other protected areas that are suffering from overtourism and too much anthropogenic disturbance.

Parks Canada should establish a network of National urban parks across Canada. Initial focus should be on cities where considerable work is already underway to protect urban and near-urban wilderness. It's crucial that Parks Canada add value to existing conservation efforts, rather than just taking over what's already underway. There are several notable prospects throughout the country tailored to the local context of each region. These include:

- Blue Mountain - Birch Cove Lakes, Halifax, Nova Scotia;
- Ste Thérèse Island, Montreal, Quebec;
- Windsor, Ontario;
- Gatineau Park, Quebec (near Ottawa);
- National Capital Greenbelt, Ottawa, Ontario;
- Edmonton River Valley, Edmonton, Alberta;
- Saskatoon, Saskatchewan.

There are also significant opportunities to establish urban or near-urban coastal NMCAs on all three coasts, especially where there are existing protected areas on the upland. The proposed Southern Strait of Georgia National Marine Conservation Area Reserve is one such example.

Another emerging opportunity for Parks Canada to explore is the Municipal Fund for Biodiversity – an innovative partnership between CPAWS and municipalities and others where municipalities levy a minor fee to taxpayers that goes into a fund that can then be used for partnership conservation projects – in QC the province has added a matching fund to leverage these municipal levies. This program is up and running with 20+ communities on board in QC, and expanding to other provinces. Parks Canada could explore whether they could get involved and add value.

Recommendation 6: Parks Canada continues working with experts and stakeholders to improve diversity, inclusion, and accessibility effectively and without compromising ecological integrity.

We commend Parks Canada for focusing on diversity, inclusion and accessibility as part of the guiding principles that help shape the Agency's work. We also commend Parks Canada's ambition to become an innovator in inclusion, accessibility and reconciliation. Addressing Diversity, Equity, Inclusion, and Accessibility is a complex topic, which was evident by Parks Canada's decision to create a second Round table meeting regarding accessibility. Creating effective and meaningful programs to address this topic will require specific capacity, strategic direction, and an abundance of resources. Parks

Canada can be a leader in demonstrating that all Canadians are indeed welcome to National Parks and that there are things for them to do when they get there.

We recommend that Parks Canada continue to engage with non-traditional stakeholders and groups whose focus and expertise is on addressing Diversity, Equity, Inclusion, and Accessibility for an underrepresented group of Canadians. Understanding who is currently visiting parks, and more importantly who is not visiting parks, is an essential component of this work. This need speaks to the need for increased social science capacity across the Parks Canada agency. Parks Canada should work with underrepresented groups to ensure:

- Barriers are accurately defined, and programs are put in place to reduce those barriers.
- Improve targeted communications for specific groups so they feel welcome before they arrive at a National Park site.
- Ensure that addressing this issue does not inadvertently come at the cost of reducing ecological integrity.

Additional comments: Overall organization of the Minister’s Round Table.

We appreciate Parks Canada’s work in organizing this virtual Minister’s Round Table, especially in these unprecedented times, and would like to commend the team and facilitator for their excellent work. It was also nice to see different stakeholders present than in past MRTs or stakeholder consultations. These sessions reinforced the broad diversity of Canadians who are interested in the national parks and their management.

Recognizing that coordination was likely hampered by COVID-19 and other urgent priorities, we do want to note that the lack of up-front engagement in planning and organizing the Round Table, and the lack of advance notice made it very challenging for us to engage the right people, mobilize partners and supporters to participate, and to provide the best possible input. In future we request that we be given at the very least advance notice of the upcoming consultations to allow us adequate time to prepare. Ideally, we would also appreciate being engaged in the dialogue about the broader structure and process for the Round Table, including the themes and framing questions, as well as the best place(s) for our own engagement. We note that we have been much more engaged in many of the past MRT’s.

Finally, we noted the unfortunate absence of the Minister from four out of the five stakeholder meetings CPAWS attended. Acknowledging current scheduling challenges in the pandemic crisis, we think it would have been highly beneficial for the Minister to attend more of these sessions in person to directly engage with the stakeholders.

We look forward to seeing the response to the MRT within 180 days, and to continued engagement with the Minister and with Parks Canada.