

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

February 13,
2023

The Canadian Parks and Wilderness Society (CPAWS) is pleased to participate in the 2023 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 would like to congratulate Parks Canada on the release last week of the new policy on National Marine Conservation areas (NMCAs), which reflects much of the feedback provided by CPAWS and our supporters during the 2019 public consultation process. We would also like to commend Parks Canada on the recent decisions made to restrict cars on the road to Moraine Lake in Banff National Park due to overcrowding as part of the larger Lake Louise Area Strategy, and to buy out lodges in the Tonquin Valley of Jasper National Park to better protect mountain caribou. We encourage Parks Canada to continue to make these kinds of difficult decisions when needed to maintain and restore the ecological integrity of our national parks and NMCAs.

The recently approved Kunming-Montreal Global Biodiversity Framework presents an important opportunity for Parks Canada over the coming years. The Agency is well-placed to play a leadership role in implementing the Framework by contributing to well-designed and effectively managed networks of protected areas on land and in the ocean, in partnership with Indigenous peoples. The Agency is also well-placed 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 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 16, 2021), Speech from the Throne (November 23, 2021) and international commitments (December 18, 2022).

We have organized our recommendations under the following three priority themes:

1. In partnership with Indigenous Peoples, delivering on the commitment to establish 10 new national parks and 10 new NMCAs as a major contribution to Canada's domestic and international commitment to protect at least 30 percent of land and ocean 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 support biodiversity conservation more broadly by ensuring 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 by strengthening monitoring and public reporting.

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

Recommendation 1. Significantly ramp up efforts to establish national parks/national park reserves, national urban parks (NUPs), and NMCA(R)s to contribute to protecting at least 30 percent of land and ocean by 2030.

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

- a. **Develop and publicly release an implementation plan** for how Parks Canada will, in partnership with Indigenous Peoples, create 10 new national parks and national park reserves in the coming years.
- b. **Work to complete establishment agreements for all currently proposed national parks and NMCAs by 2025.**
This includes South Okanagan-Similkameen National Park Reserve (NPR), Pituamkek NPR, Ellesmere Island NMCA, Les Îles de la Madeleine Marine Protected Area (MPA), Eastern James Bay NMCA, Western James Bay and Southwestern Hudson Bay NMCA, and the Southern Strait of Georgia NMCAR. We also note that Tallurutiup Imanga is currently still proposed and not yet designated in law although it is currently being included in Canada's accounting. We urge you to work with Indigenous partners to draft regulations and complete the establishment process.
- 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 ocean 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. **Continue work to incorporate climate change considerations** into the planning, establishment and management of Parks Canada protected areas, for example by identifying, valuing and securing high-carbon ecosystems, and contributing to land and seascape-level climate change adaptation strategies for nature and people.
- e. **Increase capacity to support planning and establishment of new National Parks/Reserves, NMCA(R)s, and NUPs to ensure it is commensurate with the scale and urgency of current commitments.**
Increased capacity to support establishment processes is critically needed, especially regionally, to prevent bottlenecks and delays.
- f. **To ensure the establishment of an effective network of National Urban Parks that will protect and restore significant ecosystems in urban landscapes, connect Canadians to nature and build public support for conservation efforts:**
 - In early 2023, publicly release a National Urban Parks Policy Framework that requires NUPs to meet agreed-to Canadian protected area standards to ensure consistent, high quality conservation outcomes, regardless of governance model;
 - Complete all seven national urban parks currently in development;
 - Secure adequate budget funding for full implementation of the commitment to 15 new NUPs by 2030;
 - Identify the next eight national urban parks for the second stage of program implementation, ensuring there is at least one national urban park in each jurisdiction.

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.

To ensure effective conservation outcomes, it is imperative that Parks Canada not only manage to maintain and restore ecological integrity inside protected areas, but also engage in the management of the broader land and seascape, and across jurisdictional boundaries.

- a. **Leadership at the park level to contribute to managing the broader ecosystems around national parks and NMCA(R)s in ways that support the ecological integrity of the parks.**
Wildlife do not respect protected area boundaries. The recent extirpation of the Maligne herd of caribou from Jasper National Park is an important reminder of the important role surrounding landscapes play in maintaining the ecological integrity of protected areas. In the marine environment, species like the Gulf of St. Lawrence beluga whale ranges beyond protected area boundaries and are affected by activities outside of park boundaries, such as vessel traffic which can cause fragmentation and disturbance, threatening their populations. Parks Canada has an important leadership role to play beyond the boundaries of its protected areas, by convening partners, providing expertise, encouraging conservation-focused planning and implementation of large land and seascape conservation actions.
- 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:

- Ramp up implementation of the Ecological Corridors program by supporting more priority projects in 2023.
- Publicly release a strategy for feedback for the Ecological Corridors program in early 2023.
- 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 and coordinate with the ECCC-led Pathway to Target 1 Connectivity Working group and other leading connectivity initiatives and organizations in Canada and internationally.

c. Enhancing connectivity between marine and terrestrial biomes.

The marine environment is intimately connected with the terrestrial one. Applying protection to coastal waters adjacent to already established national parks can help bridge the gap and enhance conservation measures already underway, as well as expand tourism opportunities. For coastal national parks, such as Fundy, for example, the Bay of Fundy plays a significant role in the health of the park. There is currently lots of momentum around marine protection in the Bay of Fundy, including the DFO network plan for the Scotian Shelf-Bay of Fundy Bioregion and federal interest in expanding the National Marine Conservation Area (NMCA) network. Taking advantage of these initiatives and working with partners to expand and enhance protection of coastal and marine environments near Fundy NP would benefit the ecosystems and species of the park and would also enhance the visitor experience.

d. 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. Achieving this includes, among other priorities, 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 seascape while mitigating impacts for all sites.

a. Continue taking a firm stand on limiting development in national parks.

CPAWS is highly supportive of the objective in the new Banff National Park management plan to maintain or reduce the development footprint from 2021 levels. This decision will influence many park decisions in the future and provide a strong foundation to guide any potential future development. A firmer stand is needed to limit commercial development in all of Canada’s iconic Rocky Mountains national parks, which are suffering from the cumulative effects of development pressures coupled with overtourism. All development proposals should be considered within the context of cumulative effects *and* overall development footprint.

b. Prevent overuse of parks and sensitive sites within them by developing and implementing a visitor use management strategy in all parks with high visitation rates.

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. We applaud the recent development of a Lake Louise Area Strategy that addresses the enhancement of ecological integrity, and high-quality visitor experiences. Looking at the landscape holistically is the most effective way of managing these parks into the future. The recent decision to close vehicle access to Moraine Lake in Banff National Park is a good one and is necessary to help reduce negative ecological impacts as well as improve visitor experience. We encourage Parks Canada to continue to make these kinds of difficult decisions that will deliver benefits for nature and for people.

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

In 2019, the federal government committed to implementing Minimum Protection Standards for all new federal MPAs, including NMCAs, 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, monitoring, and reporting gaps, we recommend:

- That Parks Canada prioritize budget requests for increased A-base funding for ecological integrity science and monitoring. Long term monitoring and reporting is essential to provide the necessary information to deliver on the legislative mandate to maintain or restore the ecological integrity as the first management priority, and building these programs requires long-term secure funding.
- Reviewing the ecological integrity monitoring program to ensure it is adequately tracking the state of park ecosystems and ensuring the full monitoring results for each park are publicly available and easily accessible. We note that the limited number of monitoring indicators and measures in the current system are failing to capture some significant negative environmental trends. For example, ecological declines associated with the recent extirpation of the Maligne caribou herd in Jasper National Park did not show up in the most recent state of parks report.
- Reinvesting in a human dimensions program both at the national and regional levels of the Parks Canada Agency. Conducting adequate, scientifically robust human dimensions research and monitoring is critical for improving the visitor experience in parks and ensuring ecological integrity is maintained or restored. This data represents a significant gap in how management decisions are made, yet is essential to quantify success of management plans, especially those strategies that focus on visitor use and experiences. Parks Canada needs to increase their National and Regional capacity to collect data regarding visitor motivations and expectations so that management decisions can be based on ecological and social data.
- CPAWS values the role of tourism as a mechanism to connect Canadians to our amazing National Parks and Historic Sites. Working collaboratively with tourism organizations to share data on tourist expectations and motivations can help inform management and identify other data gaps and avoid raising unwarranted expectations from Parks Canada by tourism organizations.
- 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 the UNESCO World Heritage Committee.

Wood Buffalo National Park and World Heritage Site is facing unmitigated threats from increasing upstream industrial development, threatening its ecological integrity and First Nations' cultural practices. The World Heritage Monitoring Mission will provide its recommendations this year on whether to list Wood Buffalo National Park as "World Heritage in Danger". Despite progress being made on the Wood Buffalo National Park Action Plan, much more work and funding is needed to complete implementation of 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.

Overall comments on the organization of the Round Table

We appreciate Parks Canada's work in organizing this virtual Minister's Round Table and would like to commend the team and facilitators for their work. It was nice to see different stakeholders present and hear their various perspectives. It was especially gratifying to witness the extent of engagement with Indigenous participants and listen to their feedback. These sessions reinforced the broad diversity of Canadians who are interested in the national parks and their management.

As with the 2020 Round Table, we would like to point out the lack of up-front engagement in planning and organizing the Round Table. We would greatly appreciate being engaged in the dialogue about the broader structure and process for the Round Table, including the themes and framing questions.

One of our recommendations for planning future Round Tables would be to strengthen the scope of the Round Table to regularly focus more attention on marine management issues. The framing of this year's Minister's Round Table failed to adequately capture priority issues for NMCA's and the marine biome.

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