

The Honourable Catherine McKenna  
Minister of Environment and Climate Change  
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Cam Zimmer  
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December 10, 2018

Dear Minister McKenna and Mr. Zimmer,

**RE: CPAWS comments on the Draft Action Plan for Wood Buffalo National Park**

On behalf of the Canadian Parks and Wilderness Society (“CPAWS”) we appreciate being given the opportunity to comment on the Draft Action Plan for Wood Buffalo National Park (the “Park”).

CPAWS is a national charity dedicated to the protection of Canada’s public lands and water and ensuring that Canada’s parks are managed to protect the nature within them. Over the course of our history, we have led the creation of over half a million square kilometers of protected areas – an area larger than the Yukon Territory! The role of the CPAWS Northern Alberta and Northwest Territories chapters is to provide landscape-scale, science-based support and advice for the conservation and protection of Alberta and NWT’s wilderness. CPAWS Northern Alberta has been active in conservation issues in Alberta since 1968, and regularly collaborates with government, industry, and Indigenous communities on these issues. CPAWS Northern Alberta also strives to educate and bring awareness to Alberta’s residents and visitors about the importance of protecting Alberta’s wilderness. CPAWS NWT was established by local volunteers in 1996. The primary roles of the chapter are engaging in collaborative protected areas planning and educating the public to support conservation outcomes and community-led land stewardship activities.

The CPAWS Northern Alberta and CPAWS Northwest Territories chapters take particular interest in Wood Buffalo National Park, Canada’s largest national park, as it straddles the border between Alberta and the Northwest Territories. The Park protects a large area of boreal forest and contains the largest freshwater boreal delta in the world – the Peace-Athabasca. The Park is home to numerous migrating waterfowl, provides nesting habitat to the endangered Whooping Crane, and is the only place on earth where the predator-prey relationship between wolves and wood bison has continued unbroken over time. The Park also provides habitat for the boreal woodland caribou, which is listed as “threatened” under Canada’s *Species at Risk Act* (SC 2002, c. 29).

CPAWS has a history of working to protect the integrity of Wood Buffalo National Park's ecosystem. CPAWS successfully campaigned to have forestry activities removed in the park in the 1990s, and in the early 2000s worked side-by-side with the Mikisew Cree First Nation to stop the development of a road directly through the park. In 2014, we supported the Mikisew Cree First Nation's petition to the World Heritage Committee requesting inclusion of the Park on the List of World Heritage Sites in Danger.

Our comments on the Action Plan are below:

**General Comments:**

- The Action Plan is extensive, but still falls short on many of the recommendations set out in the Reactive Monitoring Mission ("RMM").
  - We would like to see all aspects of each recommendation made in the RMM incorporated into the Action Plan.
- Overall, there is a general lack of specificity in many areas of the Action Plan.
  - For example, the Action Plan states the Indigenous Groups will play a much stronger role in program governance (pg. 57), but fails to state how they will play a stronger role. Local peoples must be equal partners in monitoring and managing the future impacts of the site C Dam and other potential developments, such as the Teck Frontier mine, on the Park. It is imperative that funding is allocated to include Indigenous and local community members living around the Park in land management and monitoring activities. This includes priority hiring of staff and ensuring that traditional and local knowledge is present in all management and monitoring activities. This would be aligned with Canada's commitment to reconciliation, and the Aichi Biodiversity Targets, particularly Target 18 and Strategic Goal E to 'enhance implementation through participatory planning, knowledge management, and capacity building'.
  - The Action Plan states additional Science Teams will be created if needed (pg. 58), but does not elaborate on what they mean by Science Teams, who would be included in these Science Teams and how will they determine "as needed".
- The Action Plan fails to identify the Management Plan review as an opportunity in the future to incorporate improvements made in the RMM.
  - We would like to see action items in all themes that indicate how the Management Plan will allow for ongoing management action related to the Outstanding Universal Values ("OUVs") of the Park and improving ecological integrity in the park.
  - The Action Plan states that Management Plans will be reviewed every 10 years, when the Minister has mandated in the Minister's Report on the 2017 Round Table on Parks Canada that they be reviewed every 5 years.
- There is no reference in the Action Plan to the Minister's Round Table Report on Parks Canada held in January 2017 – the Action Plan should specify how, and what elements, of the Minister's Report will be incorporated into the Action Plan
- We understand the government of Canada has struck a panel tasked to examine how ecological integrity is actually considered in decision-making in Parks Canada. While this panel may not yet be announced, the Action Plan should identify that this was a recommendation out of the Minister's Report on the Round Table on Parks Canada, and that they will likely receive guidance on Ecological Integrity-first decision-making from an appointed committee.

- The Action Plan is not available to the Canadian Public – it must be explicitly requested. This is not sufficient in allowing the general public the opportunity to review, understand, and comment on the Action Plan.
  - As such, we would like to see this Action Plan made publicly available to all Canadians, without specific request, so that they too have the opportunity to review and comment on it as they see fit.

**Theme: Environmental Assessment**

- The Action Plan fails to address RMM Recommendation 4: to conduct an environmental and social impact assessment of the Site C Project. Parks Canada is positioning itself to a future reactive response to Site C; this gives little confidence that the Action Plan will improve the state of the Park's environment. Rather it is reasonable to predict further degradation of ecological integrity over the long term. Parks Canada owes residents adjacent to the Park and downstream all the way to the Beaufort Delta, an explanation of how they will be prepared to respond to the effects of the Site C Dam.
  - The Action Plan states that Indigenous partners have noted that Site C is having an effect on the Peace Athabasca Delta, yet actions to mitigate the impacts of Site C are not included in Action Plan.
  - We would like to see plans to conduct an environmental and social impacts assessment of Site C Dam, to meet RMM Recommendation 4, addressed in this Action Plan. If these plans are not included then:
    - The Action Plan should address why no further environmental assessment was conducted on Site C.
    - The Action Plan should address why there is no socio-economic or cultural impacts assessments completed on Site C.
- The Action Plan fails to discuss whether impact assessments (IA) within national parks are sufficient.
- The Action Plan fails to mention Parks Canada's internal IA policy or the Park's Management Plan as a relevant piece of program/legislation.
  - We would like to see these included within the relevant programs/legislation section of this Action Plan.
- The Action Plan fails to specify to what extent current and future environmental assessment reviews must consider the OUVs of Wood Buffalo National Park.
  - We would like to see a more detailed description about what current and future IAs must consider with respect to the OUVs of the Park.

**Theme: Conservation Area Connectivity**

- An outcome in this theme should be to gain an understanding of what a "buffer zone" means in the Canadian context.
  - An analysis of what is included in a buffer zone should be included here.
  - An analysis of other buffer zones around other natural World Heritage Sites in the world should be completed. This should include how land use planning and resource management are considered.
- The Actions in this theme fail to consider the unprotected areas surrounding the Park and their management.
  - As these areas are also important in landscape connectivity, the Action Plan should be expanded to include these areas.

- This Theme fails to address Indigenous Groups living directly adjacent to the park, and how the introduction of a buffer zone might impact them.
  - We would like to see an analysis conducted on how a buffer zone might affect Indigenous Groups living adjacent to the Park included in this Action Plan. Furthermore, we would like to see these Indigenous Groups included in the coordination of this analysis.
- The Action Plan should address the proposed Ronald Lake Bison Stewardship Area. This area should be legally designated as a protected area, ideally to be managed as an Indigenous Protected and Conserved Area by the Mikisew Cree First Nation, before construction of the proposed Teck Frontier Oil Sands Mine begins.

**Theme: Tailings Management**

- The Action Plan does not identify what new strategies will be taken with respect to tailings management.
  - The Action Plan only states what is currently in place for tailings management. This is inadequate as current management of tailings ponds is insufficient and tailings ponds currently pose a significant risk to human and wildlife health.
  - We would like to see this Action Plan outline *new* strategies to address the current issues with tailings management such as leakage into groundwater and entry into the Athabasca watershed, and migratory bird contacts with tailings-affected water.
- The Action Plan intends to use the Tailings Management Framework, which does not consider impacts on the Peace Athabasca Delta.
  - We would like to see this Action Plan specifically address the PAD, and the risks that tailings pose to the PAD through vertical seepage into the groundwater and to flow into the Athabasca River.

**Theme: Monitoring and Science**

- The Action Plan fails to address the ongoing problems with capacity at Parks Canada that resulted from funding cuts in 2012 in the threats section of this theme
  - We would like to see how money that will be allocated to the park is going to be used to boost Parks Canada capacity for resource management and monitoring. This includes priority hiring of local staff and ensuring that traditional and local knowledge is present in all management and monitoring activities.
- The Action Plan fails to indicate any increase in funding for the Park.
  - Due to the size and needs of the Park, we would like to see a substantial in funding for the Park in the regular budget. The \$27M allocated in June 2018 is not sufficient to address these needs.
- The Action Plan lacks specificity in regards to Wetland Classification and to deal with differing jurisdictional classification schemes.
  - We would like to see a specific outline on how wetlands will be classified and which jurisdictional classification scheme will be used.
- The Action Plan fails to identify the *Canada National Parks Act*, the Management Plan, or the fact that maintenance or restoration of Ecological Integrity is the first priority in the relevant programs/legislation.
  - We would like to see these included within the relevant programs/legislation section of this Action Plan.

**Theme: Wildlife/ Habitat Conservation**

- The Action Plan should consider RMM Recommendation #2 here as well.
  - RMM Recommendation #2 states “Considering the increasing pressures on the property at this time, prioritise conservation and ensure that the State Party’s science capacity enables Parks Canada’s legal obligation to maintain and restore the Ecological Integrity of the property.” Wildlife/habitat conservation has everything to do with managing the park to maintain and restore ecological integrity.
- Ecological Integrity as a first priority should be considered in this theme.
- The Action Plan fails to consider the Management Plan and the *Canada National Parks Act* in this theme.
- The Action Plan fails to recognize the *Convention for the Protection of Migratory Birds in the United States and Canada* in this theme.
  - Migratory birds use the Park during their spring and fall migrations and many species nest in the Park. The *Convention for the Protection of Migratory Birds in the United States and Canada* considers management of migratory birds through conservation and sustainable use of bird populations, and therefore should be recognized in the Plan.
  - The Action Plan fails to mention bird deterrent systems to prevent landings on tailing ponds. We would like to see plans for the research on, and establishment of, effective birds deterrents to be included in this Action Plan. Current systems are insufficient (see CPAWS Northern Alberta’s submissions and oral evidence in the Teck Frontier Mine hearing).

**Summary:**

CPAWS is supportive of the development of an Action Plan to address the recommendations in the Reactive Monitoring Mission for Wood Buffalo National Park. We commend Parks Canada for this step of releasing a Draft Action Plan. However, we believe that this Draft Action Plan is not adequate, as it fails to consider all recommendations made by the RMM and fails to provide the necessary detail required to ensure that the Park and its OUVs are protected. We expect that the final version of the Action Plan will be expanded to all recommendations outlined in the RMM and that more detail will be provided on the ones that are addressed in this draft.

Sincerely,



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