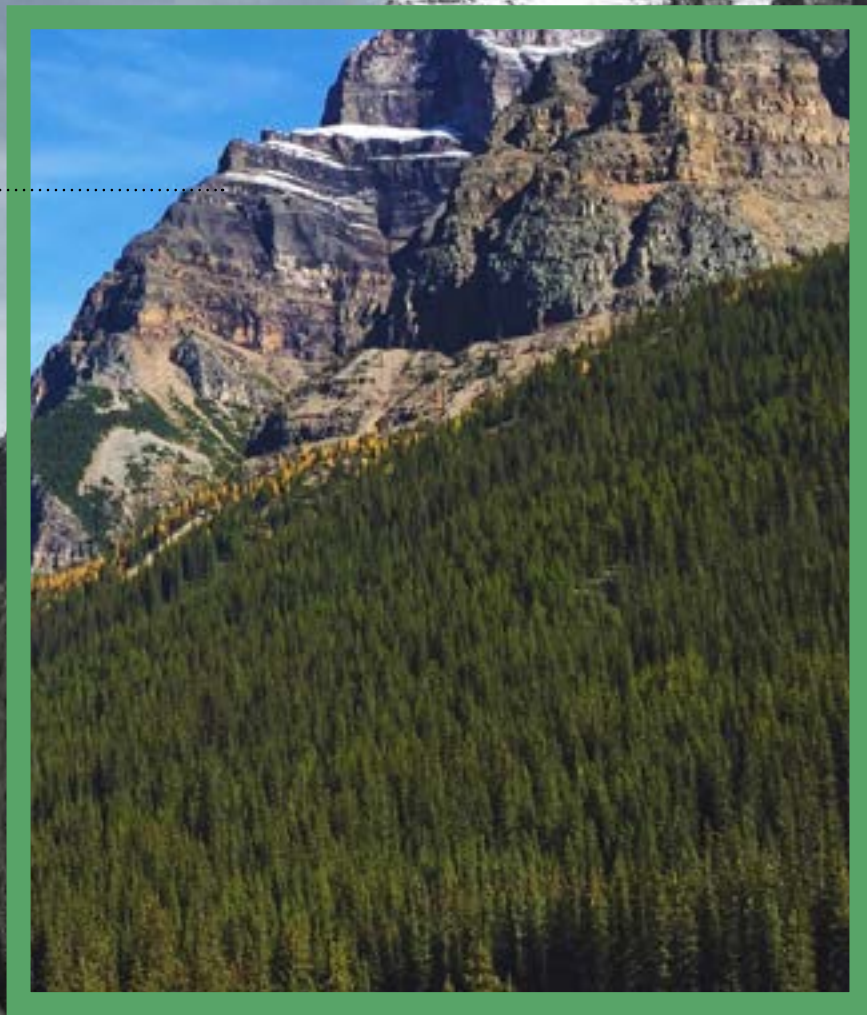


# PROTECTING CANADA'S NATIONAL PARKS A CALL FOR RENEWED COMMITMENT TO NATURE CONSERVATION

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**Front cover: Canadian  
Rockies.** *Photo Ezra Jeffrey*

**Pages 2–3:** *Photo Bill Pennell*

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# EXECUTIVE SUMMARY





*Photo Courtney Milne*

For almost a decade CPAWS has observed a significant shift in Parks Canada's approach to managing 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.

**Previous page: Great Blue Heron.**

*Photo BGSmith/Adobe Stock*

National parks are places where people can enjoy and appreciate protected nature in ways that leave them "unimpaired" for the benefit of future generations of Canadians. To fulfil this promise, Parks Canada is tasked with carefully managing our national parks to ensure their ecological integrity is protected first and foremost.

Unfortunately, in the past few years, CPAWS has noted the following trends in Parks Canada's management of our national parks:

1. More behind-closed-door decision-making, with less public engagement, and a growing disregard for public feedback in decisions;
2. An increasing focus on tourism, marketing, increased visitation, supporting non nature-focused recreational activities, and revenue generation, without adequate attention to the implications this might have for the parks' ecological integrity; and
3. Decisions being made that contravene existing policies and legislation specifically designed to limit development and protect ecological integrity in our national parks.



**Lake Louise, Banff National Park, AB.** *Photo James Anderson*

CPAWS is encouraged by commitments made by Canada's new federal government to limit development in our national parks, re-focus on protecting their ecological integrity, re-invest in science-based management, ensure open and transparent decision-making, and work more collaboratively with stakeholders and the public. Eight months into their mandate, we have seen two important decisions that begin to deliver on these commitments – the cancellation of the giant Mother Canada statue proposed for Cape Breton Highlands National Park, and the strengthening of legislation to better protect the ecological integrity of the Rouge National Urban Park. However, there is much more to be done to safeguard the future of nature in our parks.

This report highlights a number of systemic problems in how our national parks are being managed that we believe must be overcome for our new government to fully implement their commitments.

## 1) Limiting development

In the late 1990s and early 2000s three independent expert review panels recommended stronger protection measures for our national parks in response to pitched public battles over commercial development in Banff National Park, and stresses facing parks across the country. However, in recent years, a series of new developments have been approved that contravene the policies and regulations that were specifically put in place to limit development, and that ignore public opposition.

For example, in 2012 Parks Canada approved the construction of the “Glacier Skywalk” in Jasper National Park, which took a public viewpoint and turned it into a private pay-

Bald eagle.

*Photo Markus Thompson*





**Moose with calves.**

*Photo Peter Mather*

for-use theme park-like development, in spite of enormous public opposition. In 2014, the Agency granted concept approval for commercial accommodations at Maligne Lake in Jasper National Park, despite the fact that it is prohibited by the park management plan. Then, just before the federal election was called in 2015, a massive expansion of the Lake Louise ski resort in Banff National Park was approved, even though it requires removing land from legally protected wilderness to accommodate the demands of a private business to expand. In the 2016 federal budget, funding was put forward for a mysterious \$66 million paved bike path through endangered caribou and grizzly bear habitat with no prior public discussion or environmental review.

Together these developments in our Rocky Mountain National Parks pose a serious threat to sensitive wildlife and wilderness, and are out of step with Parks Canada's legislative responsibility to prioritize ecological integrity in all aspects of park management.

One of the rationales Parks Canada has put forward to justify these new developments is that visitation has been dropping and new "attractions" are needed to entice people to our parks so they remain "relevant" to Canadians. However, the data we examined tells a different story. Overall national park attendance has held relatively steady over the past 15 years, and any major drops in visitation occurred just 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, visitation to already crowded Banff National Park has increased by over 20%. Evidence suggests that national parks are still very "relevant" to Canadians. In fact, polling shows that Canadians continue to value our national parks as one of the top four symbols of Canadian identity along with the Charter of Rights and Freedoms, health care and the flag, and this has not changed for decades. Evidence also shows that Canadians value unspoiled nature and wildlife above all else in their national parks. Holding firm to policies and regulations that limit development is critical to protect nature, and reflects the public interest in protecting our national parks.

## 2) Re-focusing on ecological integrity and restoring science funding

Parks Canada's last publicly available report on the state of our national parks indicates that less than half of national park ecosystems measured were in 'good condition' and that 41% of park ecosystems had not yet been assessed. More than one third of assessed ecosystems were in declining health. Clearly much more work is needed to measure the state of park ecosystems and to maintain or restore their ecological integrity. Yet, in response to 2012 budget cuts, Parks Canada disproportionately reduced funding for conservation work, which has resulted in a 31 percent reduction in the Agency's conservation and science staff. In contrast, over the same time period staffing in the visitor experience program grew by 9 percent. As of 2015/16, only 13% of Parks Canada's spending on national parks was dedicated to conservation. This raises serious questions about whether the Agency is implementing the *Canada National Parks Act* which says:

*"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."*

Adding to these problems, the legal requirement to conduct environmental assessments on projects in national parks was lost when the previous federal government repealed the *Canadian Environmental Assessment Act* in 2012. Since then we have observed less rigour, quality and transparency in environmental reviews in national parks.

Public reporting on the well-being of national park ecosystems has effectively disappeared, with no new park-specific State of Park reports being posted publicly since 2012. Parks Canada is now out of compliance with its legislative requirement to report to Parliament every two years on the state of all our national parks, with the last report having been tabled in 2011. Meanwhile, a 2012 omnibus bill changed the legal requirement for public review of park management plans from every five years to every ten.

Rockies. Photo Ezra Jeffrey





Parks Canada’s program objectives have also shifted. In 2008/09 the Agency conducted an internal “program renewal” process with no public involvement. This resulted in major changes to the Agency’s vision and “program outcome”, minimizing the conservation focus of both. As of 2009, Parks Canada’s vision makes no mention of nature conservation or ecological integrity despite this being the first priority by law for managing our national parks. This fundamental shift in management focus continues to drive actions on the ground in national parks today.

The previous federal government was reluctant to reach beyond strict areas of federal jurisdiction. Yet the science is clear that successfully conserving nature in parks requires managing them as part of the broader landscape. We highlight an immediate opportunity around Gros Morne National Park, a World Heritage Site in Newfoundland and Labrador, to pursue regional collaboration, working with local communities, the provincial government and others to implement UNESCO’s recommendation to create a buffer zone around the park that would protect it from industrial development threats.

### 3) Open, transparent decision-making

Opportunities for Canadians to have their say in decisions about our national parks have diminished in recent years. Public consultations on development proposals have become limited to a few weeks of geographically restricted consultations, often after years of behind-closed-door discussions with private developers, and often after decisions have already been made internally. In many cases, like the Lake Louise Ski Resort expansion and the Glacier Skywalk, proposals have been approved in spite of strong public opposition.

Public accountability measures like the Minister’s Round Table, which is legally required every two years under the *Parks Canada Agency Act*, have become tightly scripted events, focused almost entirely on how to increase park visitation, with no attention paid to nature conservation in recent years.

Arctic ground squirrel,  
Nahanni National Park  
Reserve, NWT.

*Photo Alison Woodley*



## 4) Conclusion and Recommendations

If Parks Canada continues to allow more development in our parks, and focuses on marketing, increased visitation and revenue generation with inadequate regard for nature, wildlife and wilderness in our parks will be whittled away, and we will fail to deliver on our commitment to pass along our national parks unimpaired to future generations. It is time to re-focus on conserving nature first and foremost in our national parks.

This does not mean keeping people out of parks, it means making sure that the collective impact of people enjoying these special places does not jeopardize their wildlife and wilderness. It requires strictly limiting development; re-focusing on ecological integrity, science, monitoring and public reporting on the state of park ecosystems; and restoring open and transparent decision-making.

CPAWS outlines seventeen specific recommendations for the Minister of the Environment and Climate Change to shift the focus of national park management back to the legislative first priority of protecting nature, and to deliver on the new federal government's commitments:

### **IMMEDIATELY ACT TO LIMIT DEVELOPMENT INSIDE NATIONAL PARKS BY:**

1. Cancelling approvals of the massive Lake Louise Ski Resort expansion in Banff and the Maligne Lake resort proposal in Jasper;
2. Halting the \$66M bike path proposal for Jasper and re-directing these funds to conservation priorities such as endangered caribou, ecological monitoring, and public reporting;
3. Re-affirming the commitment to no increase in development footprint in Banff and Jasper;
4. Assuring that regulated wilderness areas will not be changed to accommodate new infrastructure development;
5. Maintaining the existing development and population caps in the Town of Banff and other park communities.

### **RE-FOCUS ON ECOLOGICAL INTEGRITY BY:**

6. Establishing an independent expert review panel to examine the growing disconnect between Parks Canada's programs and the legislative direction that ecological integrity is the first priority in all management decisions, and to make recommendations for how to close this gap;
7. Implementing the commitment to re-invest \$25M per year in science-based management of parks, to fully implement the national parks ecological integrity monitoring and reporting program, and support protection and restoration activities;
8. Restoring the legal requirement to conduct the highest standard of environmental assessment in national parks;
9. Restoring the requirement that all national parks staff, regardless of their role in the organization, participate in an ecological integrity training program so they understand the Agency's legislative responsibility, and their role in helping to implement it;

10. Directing park staff to actively re-engage in the management of the greater park ecosystems, and as a first example, immediately work with with the NL government, local communities and tourism businesses, to implement the UNESCO World Heritage Committee's recommendation to establish a buffer zone around Gros Morne National Park;
11. Revoking the 2009 internal Parks Canada vision statement and strategic outcome, and committing to engage Canadians in any future program renewal;
12. Restoring the legal requirement for management plan reviews from every 10 years to every 5 years;
13. Opening up state of park reporting to external peer review and ensuring system-wide reports are tabled in Parliament on-schedule every two years, and all reports are publicly available online.

**RESTORE OPEN, TRANSPARENT DECISION-MAKING AND PUBLIC ACCOUNTABILITY IN OUR NATIONAL PARKS BY:**

14. Restoring the Minister's Round Table to its original intent as a public accountability mechanism;
15. Appointing a national parks advisory committee to the Minister to provide on-going advice on managing the parks, including on maintaining or restoring ecological integrity, and ensuring effective public involvement in decision making;
16. Appointing advisory committees to Superintendents in national parks, similar to what exists in the Bruce Peninsula National Park;
17. Committing to listening to and better respecting Canadians' views on national park management and policy development.



Hiker in the Rockies.  
Photo Kalen Emsley

# INTRODUCTION





Above: Lynx.  
*Photo Ashley Hockenberry*

Previous page: Canoeing in  
Kejimikujik National Park,  
Nova Scotia.  
*Photo Senetra Ekenayake*

Canada's annual Parks Day on July 16, 2016, is an opportunity to celebrate our spectacular national, provincial and territorial parks, and to reflect on how well we, as a country, are doing at protecting these natural treasures for current and future generations.

For the past eight years, CPAWS has issued an annual report on the state of Canada's parks. Over time, our reviews have ranged from celebrating significant progress to noting a slowdown, to highlighting threats. This year's report focuses on challenges in the management of our national parks that have emerged over the past decade.

CPAWS has repeatedly raised the alarm about the growing shift in emphasis in how Parks Canada is managing our national parks, moving away from their legislative mandate to protect parks' ecological integrity as the first priority, and towards a more tourism development and marketing focused agenda.

In particular, CPAWS has noted the following trends:

1. Behind-closed-door decision-making, with less public engagement, and a growing disregard for public feedback in decisions;
2. An increasing focus on tourism, marketing, increased visitation, supporting new non nature-focused recreational activities, and revenue generation, without adequate attention to the implications this might have on parks' ecological integrity; and
3. Decisions being made that contravene existing policies and legislation specifically designed to limit development and protect ecological integrity in our national parks.



Left: Castle Mountain, Banff  
National Park, AB.  
*Photo Jonathan Huyer*

CPAWS appreciates that there are dedicated Parks Canada staff doing good conservation work in national parks across the country. This report is not meant to discredit their efforts. Rather it is meant to support their important work by highlighting problems with the recent shift in management direction of the Agency which is putting nature at greater risk.

Canada's new federal government, elected in October 2015, has promised to limit development in our national parks, re-focus on protecting their ecological integrity, re-invest in science-based management, ensure open and transparent decision-making, and work more collaboratively with stakeholders and the public. Eight months into their mandate, we have seen two important decisions that begin to deliver on these commitments – the cancellation of the giant Mother Canada statue proposed for Cape Breton Highlands National Park, and the strengthening of legislation to better protect the ecological integrity of the Rouge National Urban Park.

We applaud these positive first steps. To help guide the success of future work, this report highlights some of the systemic problems we believe need to be overcome within the Parks Canada Agency in order to achieve these federal commitments, and provides recommendations for a path forward.

National parks play a critical role in providing people with the opportunity to experience, learn about, and enjoy nature. However, to fulfill the legal obligation to pass along our parks unimpaired to future generations, nature needs to be at the heart of all management decisions. This includes ensuring that visitation is carefully managed to ensure we don't inadvertently "love our parks to death," and strictly limiting infrastructure development to maintain the wilderness habitat needs of park wildlife.

This is why ecological integrity is clearly identified as the first priority for park management in the *Canada National Parks Act*, and why the *Parks Canada Agency Act* clearly states that

Mountain goats look out over the Athabasca River, Jasper National Park, AB.  
Photo Robert Bohrer/Adobe Stock



ecological integrity is a prerequisite to park use. It's also why strict limits to development were put in place in the Rocky Mountain National Parks, where visitation is highest and commercial development pressures are most intense.

Yet in spite of these laws and policies, in recent years we have seen Parks Canada approve a series of new infrastructure developments in Banff and Jasper, shrink science and conservation budgets, and dramatically reduce opportunities for the public to have a say in the future of our parks. This direction doesn't align with what Canadians have consistently said that they want for their parks, which is to protect nature as the first priority.

These problems are not without precedent. In the 1960s, 70s and 90s there were periods when tourism and commercial interests threatened to overtake the public interest in protecting our parks. However, each time Canadians rallied to protect their parks, and with strong political leadership, the management focus was shifted back towards conservation. We are hopeful that this current trend will be similarly turned around with strong political leadership and a supportive public.

CPAWS is not alone in expressing concern about current trends in national park management. Since 2014, an unprecedented number of former senior Parks Canada managers have spoken out publicly against problematic commercial development proposals and other threats to our parks,<sup>1</sup> and thousands of Canadians have written letters, signed petitions and otherwise expressed their concerns.

This report examines the disconnect that exists between the commitments made by the new federal government and the management approach we have been observing over the past few years. By highlighting these systemic challenges, we hope to help the new federal government identify strategies to fully deliver on its commitments and its legislative mandate to better protect our national parks on behalf of Canadians, now and in the future.

Heading for the alpine.  
*Photo Maygutyak/Adobe Stock*



# COMMITMENT 1

## Limiting development in our national parks







Above: Hiker by a mountain lake.

Photo Mayguyak/Adobe Stock

Previous page: Richardson Ridge wilderness, Banff National Park, AB.

Photo Harvey Locke

Grizzly bear cubs.

Photo Gineve Smith

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.**<sup>2</sup>

The quest to prevent commercial development from damaging our parks while enabling Canadians to enjoy their natural beauty and wildlife stretches back for more than a century. In recent decades, scientists have highlighted the threat that incremental infrastructure development poses to Canada's national park ecosystems. That's why putting nature first in each and every management decision in our parks is so important, and why the views of Canadians, who value our national parks' natural beauty and wildlife above all else,<sup>3</sup> need to be respected by Parks Canada.

The new federal government's commitment to limit development in national parks is consistent with the direction that Canadians have given to the Parks Canada Agency through Parliament and through policies and plans that were developed with broad public involvement. After all, the Agency exists to represent the public interest and steward our national parks on behalf of all Canadians, not just operators and developers.



## CPAWS' ORIGINS

CPAWS was created 53 years ago in response to a call in the House of Commons from the federal Minister responsible for national parks, for Canadians to stand up and defend these treasures from an onslaught of recreation and tourism pressures.

*“How can a Minister stand up against the pressures of commercial interests who want to use the parks for forestry, mining, for every kind of honky-tonk device known to man, unless the people who love these parks are prepared to band together and support the Minister by getting the facts out across the country?”*

*–Statement in House of Commons by the Honourable Alvin Hamilton, federal Minister responsible for national parks, 1960*

The Canadian public has repeatedly rallied to protect their beloved parks by fighting off inappropriate commercial developments proposed for their national parks in the past. For example, in the early 1970s CPAWS led a broad coalition of opponents and stopped a massive condo development project at Lake Louise in Banff. In the 1990s, when out-of-control development was putting Banff's wildlife and wilderness at risk, CPAWS again led a successful public effort to stop this onslaught, and to secure permanent limits to commercial development.

As a result of these battles, independent expert panels were struck during the 1990s to study Parks Canada's approach to managing national parks and provide recommendations for how to protect their ecological integrity while providing opportunities for people to enjoy, learn about and appreciate nature. These recommendations resulted in a suite of protective measures being put in place, including:

1. Clarity in the *Canada National Parks Act* that the maintenance or restoration of ecological integrity is the first management priority in national parks;
2. Direction in the *Parks Canada Agency Act* that maintaining ecological integrity is a prerequisite to use of national parks;
3. Commitment that no new land will be made available for commercial development in Banff National Park;<sup>4</sup>
4. Policy prohibiting new outlying commercial accommodations outside park townsites in the Rocky Mountain National Parks, as well as limits to development for existing establishments;<sup>5</sup>
5. Providing for the designation, by regulation, of wilderness areas in parks to place “a legislative constraint on development”<sup>6</sup>; and
6. Creating fixed legal boundaries and legislative commercial development caps for park communities as well as a permanent population cap for the Town of Banff.

## Learning from the past – a brief history lesson

In the 1990s, three major independent expert panels were struck to examine the threats facing our parks and make recommendations to ensure their long-term ecological integrity.

### BANFF BOW VALLEY STUDY (1998)

In 1994, in response to public outcry about rampant commercial development in Banff National Park, the Minister of Canadian Heritage Sheila Copps appointed the Banff–Bow Valley Task Force to provide recommendations for the long-term management of the Park in order to protect its ecological integrity while allowing appropriate levels of development and access for visitors. After a two-year comprehensive scientific review and intensive public involvement, including through a multi-stakeholder Round Table, the Banff Bow Valley Study was released, providing over 500 recommendations to the Minister.<sup>7</sup>

In response, Minister Copps announced a suite of measures to limit development including that *“Starting immediately, no new land will be made available for commercial development in Banff National Park.”*<sup>8</sup>

### OUTLYING COMMERCIAL ACCOMMODATION PANEL (OCA PANEL)

In the late 1990s, another expert panel was appointed to specifically examine the impact of the many lodges and other commercial accommodations that are scattered through the Rocky Mountain National Parks. The Panel concluded that these outlying commercial accommodations were having a significant negative impact on the parks’ ecological integrity. In response, Parks Canada negotiated with each commercial lodge, cabin and hostel operator to establish limits to development. The resulting policy documents these limits in great detail, and also clearly states that no new outlying commercial accommodations will be permitted.<sup>9</sup>



Moraine Lake, Banff National Park, AB.

*Photo Alison Woodley*

## ECOLOGICAL INTEGRITY PANEL (2000)

Building on the findings of the Banff–Bow Valley Study, in 1998, a blue ribbon Ministerial panel of experts – the Panel on the Ecological Integrity of Canada's National Parks – was struck to assess the approach Parks Canada was taking to maintain the ecological integrity of all of Canada's National Parks. The Panel's findings confirmed that virtually all parks are under threat from stresses originating both inside and outside their boundaries, and *“Unless action is taken now, deterioration across the whole system will continue.”*<sup>10</sup> The Panel made sweeping recommendations to the Minister and the Parks Canada Agency on how to reverse this trend.



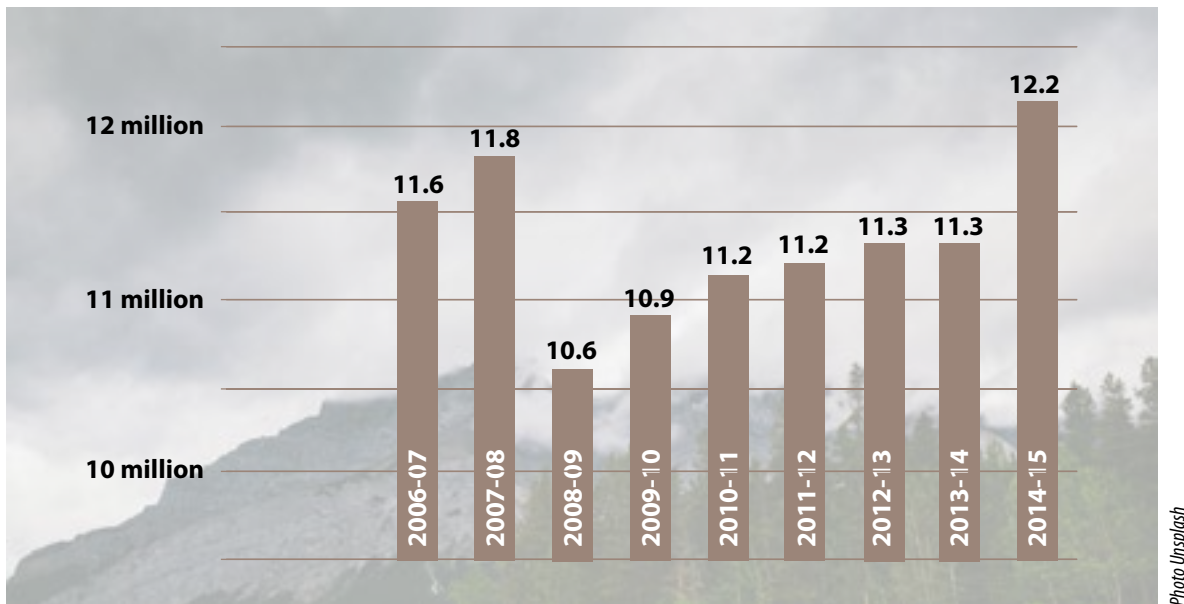
Bighorn sheep ram.  
Photo Ashley Hockenberry

The Minister accepted all of the Panel's recommendations. In the years following, significant progress was made in implementing them. Parks Canada created an action plan and put in place measures to better align the culture of the Agency with this ecological integrity–first mandate, such as training all employees and engaging them in implementing the ecological integrity mandate. The Government of Canada invested in a science–based management system to track and report on the health of park ecosystems and guide park management. The Agency engaged more closely with Indigenous peoples and with partners in the landscape around national parks, recognizing the importance of managing parks as part of the broader ecosystem. However, in recent years the Agency's focus has shifted away from this conservation–first culture once again. For example, new employees are no longer trained systematically on their role in implementing the ecological integrity mandate.

## The Current Reality

Unfortunately, after a few years of progress in implementing the recommendations of the expert Panels highlighted above, this progress slowed and has now reversed. Conservation capacity within Parks Canada has been reduced, and limits to development are being ignored in favour of allowing commercial development proposals to proceed. Together, this increase in the development footprint and reduction in conservation capacity are putting our national parks at risk once more.

One of the rationales for allowing new “attractions” in national parks put forward by Parks Canada is that visitation to parks has dropped, and new activities are needed to entice more visitors and to remain “relevant” to Canadians. However, national park attendance is on the rise. Between 2008 and 2015 there was an approximate 13% increase in visitation to national parks in Canada. While visitation in some parks has declined, overall it has held relatively steady over the past 15 years.<sup>11</sup> The only significant drops were seen in 2002, after the terrorist attacks of September 11, 2001 in the United States, and in 2008, during a global economic downturn. In the past two years, since the Canadian dollar dropped in value, visitation to Banff has increased over 20%. This pattern would suggest that visitation levels are more likely determined by global security and economic variables, rather than by Canadians' level of interest in experiencing wild nature in our parks.



**Figure 1. National Park visitation, 2006–07 to 2014–15<sup>12</sup>**

In fact, there is strong evidence that Canadians continue to cherish their national parks. Polling over decades has consistently shown that national parks are considered one of the top four symbols of Canadian identity.<sup>13</sup> Parks Canada’s own research shows that unspoiled nature and beautiful scenery are the main reasons why urban residents are attracted to our national parks.<sup>14</sup>

CPAWS commissioned a “state of knowledge” report in 2014<sup>15</sup> that examined the evidence for how to best connect people with nature, including looking at barriers people face in visiting parks. The study found that time, cost and knowledge were the most significant constraints, followed by fear, health, location and access to transportation. The types of facilities available and level of interest of the visitors were the lowest ranked barriers.

The new federal government’s commitment to limit development in our national parks is consistent with the legislation and development limits that were put in place 15 years ago. To implement this commitment, the federal government needs to reverse approvals of problematic developments that do not respect existing limits, re-affirm that these limits will be adhered to in the future, and re-focus Parks Canada’s efforts on protecting nature as a prerequisite to use, so nature in our parks can also be enjoyed by future generations of Canadians.



*Photo LightPoet/Adobe Stock*

Holding firm to policies and regulations that limit development is critical in order to send a clear signal to potential 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.

## **Cancelling “Mother Canada” — a step in the right direction**

In February, CPAWS welcomed the new federal government’s decision to reject the proposed seven-story “Mother Canada” statue in Cape Breton Highlands National Park.

This controversial private venture had been approved by Parks Canada, pending the results of a limited two-week public consultation on a limited environmental review, and in the face of resounding public opposition. In addition to the statue on the shores of Green Cove, the proposal included a large parking lot, gift shop and interpretive centre, plus a “We See Thee Rise Observation Deck” and “Commemorative Ring of True Patriot Love.” Parks Canada, even though its budget had been drastically cut back, contributed \$100,000 to the project despite indicating that it would be entirely privately funded, and had written a strong letter of support for the project.

This controversial private venture, while intended to honour Canadian soldiers who died overseas, caused much public consternation. Thousands of Canadians wrote to the former federal Minister of Environment and to Parks Canada opposing the proposal as inappropriate in a national park. There were three editorials in the *Globe and Mail* opposing the statue, one of which concluded that the “Mother Canada statue is hubristic, ugly and just plain wrong.”<sup>16</sup> Twenty-eight retired Parks Canada officials, including a former CEO and three directors general, released an open letter opposing the proposal.<sup>17</sup>

Stopping this project is an important first step to limiting development in our national parks. Now it is time to tackle other inappropriate infrastructure proposals so our parks are truly left “unimpaired for future generations.”

### **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 last summer, even though they would allow commercial infrastructure development in a regulated wilderness area, where development is currently prohibited by law. Astonishingly, Parks Canada and the ski resort claim that massive expansion of the resort would 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. 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.<sup>18</sup>

Lake Louise Ski Resort, Banff National Park, AB.  
*Photo Henry Georgi*

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 nullified, 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

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 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, Jasper Environmental Association and thousands of Canadians, Parks Canada rejected the proposed hotel but approved 13 other elements of the resort, including 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.

CPAWS and Jasper Environmental Association, represented by Ecojustice, launched a legal challenge in August 2014 against Parks Canada's concept approval of proposed commercial



Spirit Island, Maligne Lake,  
Jasper National Park, AB.

accommodations at Maligne Lake on the grounds that it contravenes the park management plan. In February 2016, the Federal Court ruled that while Parks Canada can consider conceptual proposals, ultimately the Agency cannot give final approval to a proposal if it contravenes the park management plan. This is an important confirmation that Parks Canada has a legal obligation to comply with its own rules.

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.

## FIGHT FOR YOUR PARKS!

In response to the growing threat to national park wildlife and wilderness from new commercial infrastructure developments in Banff and Jasper, last fall CPAWS and other conservation organizations joined with scientists, First Nations representatives, local Banff business owners, and former Parks Canada senior staff to launch a campaign to “Fight for your Parks.”<sup>19</sup> The goal of this campaign is to ensure there is no increase in the development footprint in Banff and Jasper National Parks, and that Parks Canada returns to open, transparent decision-making in all our national parks—in essence the return of conservation-first management of our beloved national parks.



The group is calling for:

- the reversal of the rushed approval of the massive expansion of the Lake Louise Ski Resort into legally designated wilderness;
- an immediate halt to the \$66 million bike path proposal in Jasper;
- an upholding of the Jasper Park Management Plan and Parks Canada’s Outlying Commercial Accommodations policy by stopping commercial accommodation at Maligne Lake; and
- maintaining the existing development and population caps in the Town of Banff.

For more information visit [fightforyourparks.ca](http://fightforyourparks.ca)



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 a \$66 million paved bike path in Jasper National Park. For months Parks Canada refused to share any information about this proposal. However, in late June, 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 has never been publicly 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.

CPAWS is 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, ignoring its legislative mandate and policies and disregarding the need to consult with Canadians.

CPAWS and other conservation groups are calling on the government to immediately halt this project and re-direct this significant funding to protecting wildlife, such as Jasper's endangered caribou, and to restoring conservation science capacity within Parks Canada.

Family hiking.

Photo Aleksei Potov/Adobe Stock



## COMMITMENT 2

Re-focusing on protecting ecological integrity, and restoring funding for science-based management





Puffin. Photo Arielle DeMarchant

The new federal government has committed to re-focusing on protecting the ecological integrity of our national parks and restoring funding for science-based management.

### **STRONGER PROTECTION FOR ROUGE NATIONAL URBAN PARK A POSITIVE STEP**

**In June 2016, the federal government introduced legislation into the House of Commons that prioritizes ecological integrity in the management of the Rouge National Urban Park—Canada’s first National Urban Park, located in the Greater Toronto Area. This amendment fixed a major flaw in the legislation passed a year ago, which only required the Minister to “take nature into consideration” in the management of the park. In response the Ontario government has announced that they are now willing to transfer provincial lands to the federal government to create the park.**

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.

As noted earlier in this report, in the late 1990s and early 2000s Parks Canada made significant progress in focusing the organization on delivering on “ecological integrity first” and putting the needs of nature at the centre of all decision-making. They built a science-based 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, and with other governments and 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.”<sup>20</sup> This is a far cry from the current approach of attracting park visitors to all places regardless of how overcrowded they are, in the biggest numbers possible, with little attention to the implications this has for parks’ ecological integrity.

Previous page: Cougar.  
Photo Lori Labatt

## WHAT IS ECOLOGICAL INTEGRITY?

*“...a national park has ecological integrity when it supports healthy populations of those plants and animals that are representative of the unique natural region that the park was established to protect, and that the natural processes that support park ecosystems, such as a fire cycle, are in place and function normally.”<sup>21</sup>*

In other words, protecting ecological integrity means protecting healthy nature.

## The Current Reality

In 2011, *The Globe and Mail* lauded Parks Canada's national park science program as “the latest Canadian export” and noted that their ecological monitoring program was becoming a model for parks systems around the world, including in the United States, South Korea and Finland.<sup>22</sup> However, by 2011 the Agency's focus had already begun to shift away from ecological integrity and towards increased visitation and revenue generation. Just one year later, the federal government dramatically cut Parks Canada's funding, and the Agency significantly reduced its scientific and technical capacity, as well as its interpretation and education programs.

Meanwhile, national park ecosystems continued to decline in health.

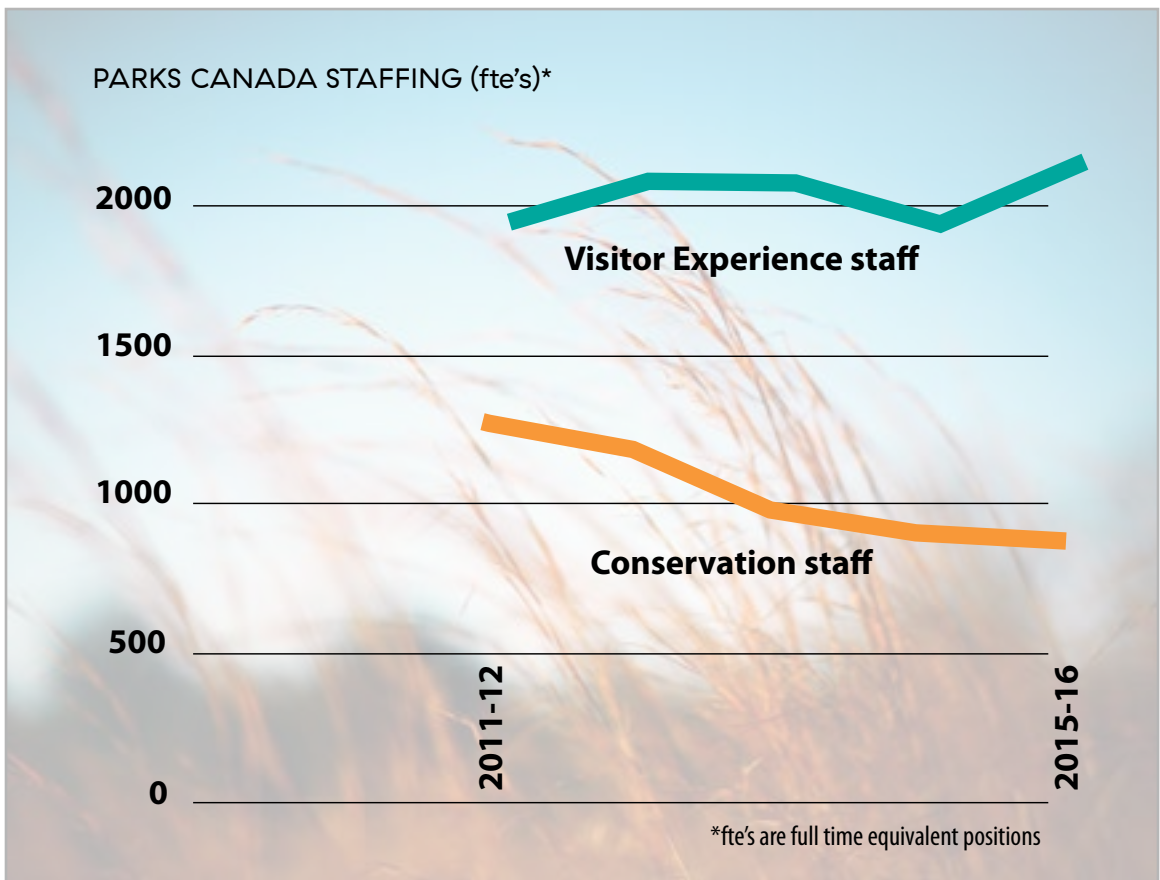
Adding to the shifting tides inside Parks Canada, the previous federal government repealed the *Canadian Environmental Assessment Act* in 2012, which meant there was no longer a legal requirement for environmental assessments of most projects within national parks, or for the public transparency that the previous environmental assessment law required. In response, Parks Canada adopted a new policy framework for environmental reviews, but in the absence of the legal requirement, CPAWS observed a significant drop in the quantity, quality and transparency of the assessments that were done. This has further exacerbated development threats to our national parks by reducing public review and accountability requirements.

In the face of this backtracking, the statement below from the Ecological Integrity Panel is as relevant today as when it was penned sixteen years ago:

*“Profound change is needed. It is time now to collectively write a different story for Canada's national parks, from a story of ecological integrity in decline to a story of ecological renewal and restoration. We must learn anew how to be responsible for our parks and for the broader landscape that surrounds them.”<sup>23</sup>*

EXAMPLE 1: BUDGET ISSUES

Recent funding cuts have affected conservation programs more than visitor experience programs, raising questions about what the Agency considers to be its “first priority.” Like most federal departments, Parks Canada’s operational budget was cut dramatically in 2012. In response, the Agency reduced program spending which in turn affected staffing. 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 <sup>24</sup>

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. Parks Canada’s visitor experience program has also shifted in focus, away from encouraging nature learning experiences to increasing numbers of visitors, including by marketing mass special events like marathons, bike races and new recreational activities. At the same time interpretation and education programs have been cut dramatically. National parks are being promoted by the Agency less as conservation areas where people can enjoy and appreciate nature, and more as recreation and sport areas focused on built tourism infrastructure.



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

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. Parks Canada certainly needs funding to repair bridges, roads, dams and other infrastructure that has fallen into disrepair, and in some cases repairing infrastructure can lessen its impact on park ecosystems, for example by installing fish-friendly culverts that re-connect aquatic ecosystems. However, this investment does not restore funding for Parks Canada’s ecological integrity monitoring and other conservation programs.

Unfortunately, Parks Canada managers do not seem to agree that more funding is needed to restore science capacity and fully implement its monitoring program. A November 2015 Parks Canada briefing book, prepared by the Agency just after the federal election, concludes that “scientific staffing levels within the Agency are appropriate for delivery of current priorities after having been adjusted in 2012 to more tightly focus on core functions and priorities.”<sup>26</sup>

This conclusion conflicts with the federal Environment Commissioner’s findings in 2013 that:

*“Parks Canada has not clarified how and by when, with significantly fewer resources, the Agency will address the backlog of unfinished work, the emerging threats to ecological integrity, and the decline in the condition of 34 percent of park ecosystems that it has identified. As a consequence, 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.”<sup>27</sup>*

Even more worrying is the complete omission from the Parks Canada briefing book of any information on the current state of national park ecosystems, which is fundamental to understanding how well Parks Canada is delivering on its mandate to maintain or restore ecological integrity, and to determine management priorities, including for funding.

The 2011 State of Canada’s Natural and Historic Places report (the most recent one available) noted that the status of 41 percent of park ecosystems had not yet been assessed. Of those that had been measured, less than half were in good condition. Of the ecosystems that were found to be in fair condition, forty-three percent showed a declining trend.<sup>28</sup>

Clearly many ecosystems in national parks are stressed, and need attention as a higher priority than marketing, attractions and special events.

Caribou, Gros Morne  
National Park, NL.

*Photo Michel Burzynski*



**EXAMPLE 2: DEMISE OF PUBLIC REPORTING:**

Public reporting on the state of national park ecosystems has declined over the past five years and, in at least one situation, Parks Canada is refusing to release monitoring information about the impact of commercial development.

Public reporting on the state of park ecosystems is a core part of the management system for national parks, and helps ensure that Canadians are aware of what's going on with their parks, including progress or problems in their protection. 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 was tabled in 2011, meaning the Agency has missed two legislative reporting requirements and is out of compliance with the law.

At the park level, public reporting is built directly into the management planning system, and 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.

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 only available for 20 of 46 national parks, with the most recent one dated 2012, and others dating back as far as 2004.<sup>29</sup>

We have been told recently by park staff that they are no longer required to produce full State of Park reports, instead just preparing "PowerPoint" presentations. It is unclear whether these documents will be 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.**





Jasper National Park, AB.  
Photo Robert Berdan

### EXAMPLE 3: SHIFTING PROGRAM OBJECTIVES:

In 2008, with no public involvement, Parks Canada initiated an internal “program renewal” exercise that resulted in a significant shift in management direction. 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**.*<sup>30</sup>

This new vision statement is:

*“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.”*<sup>31</sup>

The statement includes no mention of ecological integrity or conservation in spite of it being the legislative first priority for national park management. Its “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.<sup>32</sup>

Parks Canada already had a vision in its *Guiding Principles and Operational Policies* that was created with significant public input and focuses on conservation leadership.<sup>33</sup> 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.”*<sup>34</sup>

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.”<sup>35</sup>*

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.

At the operational level there has been 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.

Early morning mist shrouds  
fishers. Photo Ravi Pinniseti



EXAMPLE 4: RETREATING INSIDE PARK BOUNDARIES

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. Yet managing parks for ecological integrity requires regional cooperation.

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 oilsands development upstream on the Athabasca River.



Bison graze in Wood Buffalo National Park, AB.

*Photo Pi-Lens*

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. Parks Canada had a solid track record of engaging with partners around parks in the past, and although on-going partnerships continue in many areas, this work has been much more difficult in recent years. Given the commitment of the new government to more collaboration and partnerships, we are hopeful that this more inward-facing approach to park management will change.

**WORKING WITH COMMUNITIES TO PROTECT GROS MORNE'S WORLD HERITAGE STATUS<sup>36</sup>**



**Caribou, Gros Morne National Park, NL.**

*Photo Alison Woodley*

Gros Morne National Park in Newfoundland offers an immediate opportunity to collaborate with the provincial government, local communities and other interests to manage the area around the park. In 2013, this UNESCO World Heritage Site was threatened by a proposal to drill and frack for oil only metres from the park boundary. A massive public outcry ensued, and in late 2013 the Government of Newfoundland and Labrador declared a moratorium on fracking to allow for more study and public discussion. Shortly thereafter, the offshore petroleum regulator (CNLOPB) decided not to renew the proponent's exploration license. In 2014, UNESCO's World Heritage Committee welcomed these positive steps but noted that they did not provide long term protection for the area, and called on Canada to create a permanent buffer zone around the park to safeguard its "outstanding universal value." They also requested a progress report by 2016.

Parks Canada submitted this "State of Conservation" report in late 2015 which concluded that a buffer zone was not needed because the environmental assessment and other existing processes provide adequate protection for the park.

However, UNESCO's World Heritage Committee disagreed, and reiterated their

**Gros Morne National Park, NL.** *Photo Holly Lake*



recommendation for a buffer zone in a draft decision released publicly in May 2016. This decision will be voted on by the Committee at its annual meeting in July 2016.

In late May the buffer zone concept gained more support when Newfoundland and Labrador's Review Panel on Hydraulic Fracturing called for a buffer zone around Gros Morne in their final report.

There is strong public and tourism industry support for creating a buffer zone around Gros Morne to protect its natural beauty and integrity as the foundation of the local economy. Yet Parks Canada and the provincial government have so far failed to act. Buffer zones around World Heritage Sites are now standard practice, which makes this lack of action perplexing, particularly in the face of such broad support.

A buffer zone created in partnership with local community members would support the park's ecological integrity and World Heritage status as well as Newfoundland and Labrador's billion-dollar tourism economy. Supporting this sector is more important than ever to buffer the impact of the decline in the resource sector.

Gros Morne offers an opportunity for the federal and provincial governments to collaborate with local communities, the tourism sector and conservation groups to create a buffer zone that supports the park and community interests.



**Gros Morne National  
Park, NL.**

*Photo Alison Woodley*

# COMMITMENT 3

## Open, transparent decision-making





Moose, Gros Morne National Park, NL. Photo Evan Edinger

The federal government was elected on a promise of setting a higher bar for openness and transparency, and serving the public interest. The federal government’s Ministerial mandate letters reflect this promise and call on Ministers to bring a different style of leadership to their jobs, including a commitment to “pursue our goals with a renewed sense of collaboration,” to ensure. “constructive dialogue with Canadians, civil society, and stakeholders” and to focus on building nation-to-nation relationships with Indigenous peoples.

## The Current Reality

While development pressures on our parks grew over the past decade, opportunities for Canadians to have their say in decisions shrank dramatically. Public consultations have been shortened to the point where the public often has only a few weeks to comment on hundreds of pages of documents, often after years of backroom negotiations between Parks Canada and private development interests. The scope of these consultations has become very narrow, asking for comments on technical environmental assessment reports rather than asking whether Canadians support the projects.

Previous page: Ram Plateau, Nahanni National Park Reserve, NWT. Photo Alison Woodley

The Agency has also narrowed the geographic region of their consultations, even for developments in high profile parks such as Banff and Jasper, in spite of direction in the *Canada National Parks Act* to:

*“...where applicable, provide opportunities for public participation at the national, regional and local levels, including participation by aboriginal organizations, bodies established under land claims agreements and representatives of park communities, in the development of parks policy and regulations, the establishment of parks, the formulation of management plans, land use planning and development in relation to park communities and any other matters that the Minister considers relevant.”<sup>37</sup>*

### EXAMPLE 1: CONSULTATIONS ON DEVELOPMENT PROPOSALS

In recent years, public consultations on development proposals have often focused on local communities and regions, disregarding the significant interest that all Canadians have in what happens in national parks across the country. When organizations like CPAWS have worked to get the word out about consultations and encourage Canadians to get involved, this input has been downplayed as being “part of a campaign”, and somehow less legitimate and valued.<sup>38</sup>

In recent cases, such as the 2012/13 public consultation about the controversial summer use proposal for Mt Norquay in Banff, Parks Canada delegated their responsibility to consult with the public entirely to the proponent. Consultations were only promoted on the proponent's website (not on Parks Canada's), and advertised only in the local Banff area. The project description read like a marketing campaign, not an unbiased description of a significant development proposal in a national park. In our view, delegating this process to a private proponent is an abrogation of Parks Canada's responsibility to protect the public interest.

To add to these process problems, much of the public feedback about development projects in recent years has been ignored. For example, Brewster's Glacier Skywalk in Jasper National Park triggered massive public opposition, yet this project went ahead as planned.

The new \$66 million bike trail in Jasper, outlined in the 2016 federal budget, has had no public discussion whatsoever, despite such a proposal not being included in the park management plan.



Glacier Skywalk, Jasper National Park, AB.

Photo Alison Woodley



The Jasper National Park Management Plan commits to:

*“Support effective participation in decision-making by ensuring:*

- *access to clear, timely, relevant, objective and accurate information*
- *early involvement, adequate notice and time for public review”*<sup>39</sup>

This is clearly not what is happening with this proposal, which would include paving a new corridor through endangered caribou habitat.



The Lake Louise Ski Resort expansion had only a cursory public review process. After years of backroom negotiations between Parks Canada and the ski hill operator to massively expand the Lake Louise Ski Resort in Banff National Park, Canadians were given only three weeks to comment on over 250 pages of technical documents about this proposal. In spite of the short timeline, once alerted by CPAWS and other conservation groups, 1,200 people sent comments to Parks Canada, of which over 90% opposed the development. Yet the “What we Heard” report released by Parks Canada gives absolutely no indication that the overwhelming majority of respondents were opposed to the project.<sup>40</sup> No substantive changes were made prior to its approval.



Vermilion Lakes, Banff National Park, AB.

Photo Alison Woodley

## EXAMPLE 2: PUBLIC ACCOUNTABILITY MECHANISMS

To assure public accountability, the *Parks Canada Agency Act* requires that a Ministerial Round Table be held at least every two years to provide “persons interested in matters for which the Agency is responsible to advise the Minister on the performance by the Agency of its responsibilities...”<sup>41</sup> The Minister must respond to recommendations from the Round Table within 180 days. In the early 2000s, civil society groups like CPAWS were fully engaged in setting the agenda for these sessions, and were supported to attend as valued partners. However, over the past decade, these sessions have become tightly managed, with Parks Canada promoting its work, and then having facilitated workshops on questions provided to the group, largely focused on their priority of “engaging Canadians” with little or no discussion about conservation. The questions posed to participants in recent Round Tables were:

2014:

1. How can we collectively increase visitation in Parks Canada places in the North and provide a fuller experience of its unique culture in ways that strengthen the traditional economy?

2. How can we collectively better connect urban Canadians with Parks Canada places in the North?

2012:

How can we connect Canadian youth to their natural and cultural heritage through national parks, national historic sites and national marine conservation areas?

2010:

There is no public record of this Round Table.

2008:

This Round Table was organized at the very last minute, and was a half-day event held in the Parks Canada boardroom. Parks Canada staff gave a presentation on social values and demographics, and then asked the group a question about key priorities. There is no public record of what participants said, and the Minister's response to the Round Table merely lists what Parks Canada is already doing.

In the past eight years, none of the Round Tables have focused on conservation themes or how well Parks Canada is achieving its core mandate of protecting ecological integrity.

Similar problems have been observed in other public fora. For example, the Banff Planning Forum has become so dominated by tourism interests and priorities, that CPAWS and the Bow Valley Naturalists boycotted the 2016 forum in protest.<sup>42</sup>

There is a need to restore open, transparent decision-making and public involvement in decisions about the future of our national parks. Parks Canada has had good public participation processes in the past that could act as models for the future. For example, the Banff Bow Valley Task Force struck a Round Table that successfully brought diverse interests together to craft a new vision for Banff National Park in the 1990s. The Bruce Peninsula National Park has an Advisory Committee that advises Parks Canada on park management.<sup>43</sup>



**Dawn at Bow Lake,  
Banff National  
Park, AB.**

*Photo Peter Dettling*

# CONCLUSIONS & RECOMMENDATIONS





Above: South Okanagan, BC.

*Photo Graham Osborne*

Previous page: Great grey owl. *Photo SDuben/Adobe Stock*

Parks Canada’s management approach has changed dramatically in the past decade from being primarily focused on nature conservation and appreciation to prioritizing tourism and marketing, encouraging new infrastructure development, promoting mass recreational activities, and driving greater visitation even in parks that are already “bursting at the seams” like Banff. This is demonstrated by resourcing trends, shifting program objectives, renewed development pressures, a lack of regard for policies that are meant to limit development, and the demise of public reporting and engagement in park decisions.

However, Canadians want their parks protected, not developed, which is why the statutory instruments that guide park management are so clear that nature must come first in their management. As outlined in this report, it has become clear that there is a growing disconnect between Parks Canada’s approach to managing our national parks and the public interest in protecting these special places.

The new federal government’s commitments to limit development, restore science funding, re-focus on ecological integrity, and return to open, transparent decision-making in our national parks provide a hopeful sign that change is on the horizon.



Left: Nahanni National Park Reserve, NWT.

*Photo Mike Beedell*

To implement these commitments and shift the focus of national park management back to the legislative priority of protecting nature first, CPAWS recommends that the Minister of Environment and Climate Change:

**IMMEDIATELY ACT TO LIMIT DEVELOPMENT INSIDE NATIONAL PARKS BY:**

1. Cancelling approvals of the massive Lake Louise Ski Resort expansion in Banff and the Maligne Lake resort proposal in Jasper;
2. Halting the \$66M bike path proposal for Jasper and re-directing these funds to conservation priorities such as endangered caribou, ecological monitoring, and public reporting;
3. Re-affirming the commitment to no increase in development footprint in Banff and Jasper;
4. Assuring that regulated wilderness areas will not be changed to accommodate new infrastructure development;
5. Maintaining the existing development and population caps in the Town of Banff and other park communities.

**RE-FOCUS ON ECOLOGICAL INTEGRITY BY:**

6. Establishing an independent expert review panel to examine the growing disconnect between Parks Canada's programs and the legislative direction that ecological integrity is the first priority in all management decisions, and to make recommendations for how to close this gap;
7. Implementing the commitment to re-invest \$25M per year in science-based management of parks, to fully implement the national parks ecological integrity monitoring and reporting program, and support protection and restoration activities;
8. Restoring the legal requirement to conduct the highest standard of environmental assessment in national parks;
9. Restoring the requirement that all national parks staff, regardless of their role in the organization, participate in an ecological integrity training program so they understand the Agency's legislative responsibility, and their role in helping to implement it;
10. Directing park staff to actively re-engage in the management of the greater park ecosystems, and as a first example, immediately work with with the NL government, local communities and tourism businesses, to implement the UNESCO World Heritage Committee's recommendation to establish a buffer zone around Gros Morne National Park;
11. Revoking the 2009 internal Parks Canada vision statement and strategic outcome, and committing to engage Canadians in any future program renewal;
12. Restoring the legal requirement for management plan reviews from every 10 years to every 5 years;

13. Opening up state of park reporting to external peer review and ensuring system-wide reports are tabled in Parliament on-schedule every two years, and all reports are publicly available online.

**RESTORE OPEN, TRANSPARENT DECISION-MAKING AND PUBLIC ACCOUNTABILITY IN OUR NATIONAL PARKS BY:**

14. Restoring the Minister's Round Table to its original intent as a public accountability mechanism;
15. Appointing a national parks advisory committee to the Minister to provide on-going advice on managing the parks, including on maintaining or restoring ecological integrity, and ensuring effective public involvement in decision making;
16. Appointing advisory committees to Superintendents in national parks, similar to what exists in the Bruce Peninsula National Park;
17. Committing to listening to and better respecting Canadians' views on national park management and policy development.

The future well-being of wildlife and wilderness in our national parks depends on how well we take care of them today. Over the past 131 years since our first national park was created in Banff, development interests have periodically gained a foothold in our national parks, and Canadians have had to remind Parks Canada that these are our parks, and protecting nature is our first priority. We are at such a crossroads again. Parks Canada's attention has shifted away from conserving nature, and as a result our national parks are in trouble. It's time to re-focus on protecting nature once again in our most beloved wild places.



Sunset. Photo Bill Pennell

## Endnotes

- 1 Letter on Lake Louise expansion: <http://calgaryherald.com/news/local-news/former-national-park-managers-stand-up-against-lake-louise-expansion>
- Letter on Maligne Lake resort proposal: <http://cpaws.org/news/maligne-lake-letter#comments-section>
- Letter on “Mother Canada” statue proposal at: <http://www.cbc.ca/news/canada/nova-scotia/mother-canada-statue-plan-in-cape-breton-panned-by-former-parks-canada-managers-1.3105857>
- Letter on firing of Parks Canada scientist: <http://www.cbc.ca/news/canada/calgary/open-letter-from-former-parks-canada-employees-1.3242812>
- 2 Ministerial mandate letter, Minister of Environment and Climate Change, November 2015: <http://pm.gc.ca/eng/minister-environment-and-climate-change-mandate-letter>
- 3 Parks Canada. 2010. Attitudes and Barriers to Visiting Parks Canada Places: Montreal, Toronto, Vancouver
- 4 In Banff this commitment was made in response to the Banff–Bow Valley Study: [http://www.pc.gc.ca/apps/cp-nr/release\\_e.asp?id=274&andor1=nr](http://www.pc.gc.ca/apps/cp-nr/release_e.asp?id=274&andor1=nr) ; In Jasper the commitment is in the
- 5 Parks Canada. 2007. Redevelopment Guidelines for Outlying Commercial Accommodations and Hostels in the Rocky Mountains National Parks.
- 6 Parks Canada Guiding Principles and Operational Policies, National Parks Policy s2.3; <http://www.pc.gc.ca/eng/docs/pc/poli/princip/index.aspx>
- National Parks of Canada Wilderness Declaration Regulations: <http://laws-lois.justice.gc.ca/eng/regulations/SOR-2000-387/page-1.html>
- 7 Banff–Bow Valley Task Force. 1996. Banff–Bow Valley: At the Crossroads. Technical Report
- 8 [http://www.pc.gc.ca/apps/cp-nr/release\\_e.asp?id=274&andor1=nr](http://www.pc.gc.ca/apps/cp-nr/release_e.asp?id=274&andor1=nr)
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- 10 Parks Canada Agency. 2000. “Unimpaired for Future Generations?” Protecting Ecological Integrity with Canada’s National Parks. Vol. I “Call to Action.” And Vol. II “Setting a New Direction for Canada’s National Parks. Report of the Panel on the Ecological Integrity of Canada’s National Parks. Ottawa. ON.
- 11 Wright, Pamela and Matthews, Carling. 2014. Building a culture of conservation: State of knowledge report on connecting people to nature through parks. CPAVS and UNBC.
- 12 Parks Canada Attendance Reports: <http://www.pc.gc.ca/eng/docs/pc/attend/table3.aspx>
- 13 <http://www.environicsinstitute.org/uploads/institute-projects/environics%20institute%20-%20focus%20canada%202012%20final%20report.pdf>
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37 Canada National Parks Act s12⑩: <http://laws-lois.justice.gc.ca/eng/acts/n-14.01/page-2.html#docCont>

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**Paddler, Elk Island National  
Park, AB.** *Photo Nadine and Jamie  
Burdon (JaN Studios)*



## About CPAWS

The Canadian Parks and Wilderness Society (CPAWS) is Canada's only nationwide charity dedicated solely to the protection of our public land and water, and ensuring our parks are managed to protect the nature within them. Since 1963 we've played a lead role in protecting over half a million square kilometres – an area bigger than the entire Yukon Territory! Our vision is that Canada will protect at least half of our public land and water so that future generations can benefit from Canada's irreplaceable wilderness.

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