



CPAWS Southern Alberta
Suite 310, 105 12th Avenue SE
Calgary, Alberta, T2G 1A1
infosab@cpaws.org
cpaws-southernalberta.org

CPAWS Northern Alberta
7 Sir Winston Churchill Square
Edmonton, Alberta, T5J 2V5
infonyab@cpaws.org
cpawsnab.org

Government of Alberta
9915 108 Street
Edmonton, Alberta
Epa.naturestrategy@gov.ab.ca

Dear Minister Schulz,

The Canadian Parks and Wilderness Society (CPAWS) Northern and Southern Alberta chapters are pleased to provide input into the creation of a Nature Strategy for Alberta.

CPAWS is a reputable, nationwide, non-profit, charitable organization dedicated to the protection and sustainable management of public lands across Canada. The Northern and Southern Alberta Chapters are staffed by a diversity of Albertans passionate about wilderness and supported by tens of thousands of members and donors across the province. We work collaboratively with all levels of governments, industry, Indigenous Peoples, and communities to provide landscape-level, science-based support and advice to improve the protection and management of public land in Alberta for the benefit of people and wildlife.

Albertans share a deep love and pride for nature and the stunning natural spaces in our province. In [recent polling](#), 95% of Albertans indicated concern about the loss of species and the global biodiversity crisis, 85% supported the province committing to Canada's international commitment to protect 30% of its lands for conservation purposes by 2030, and 77% supported setting aside more land to protect wildlife habitat and prevent further population declines. This summer, the majority of respondents to the Alberta Plan for Parks survey reiterated support for increased protected areas to improve conservation and opportunities for low-impact, quiet recreation. They also voiced opposition to harmful activities, including large-scale commercial development and motorized recreation in existing areas.

By confronting the conditions that cause species and population declines, local extinctions, and decreased ecosystem function, a "Made-In-Alberta" Nature Strategy can support halting and reversing biodiversity loss and address climate change. In turn, this strategy can provide numerous benefits for wildlife, habitat, and our communities – including clean air and water, drought and flood mitigation, and sustainable recreation and tourism opportunities.

However, CPAWS Northern and Southern Alberta are concerned with the Government of Alberta's current intent and approach to developing a nature strategy. Below, we have



CPAWS Southern Alberta
Suite 310, 105 12th Avenue SE
Calgary, Alberta, T2G 1A1
infosab@cpaws.org
cpaws-southernalberta.org

CPAWS Northern Alberta
7 Sir Winston Churchill Square
Edmonton, Alberta, T5J 2V5
infonab@cpaws.org
cpawsnab.org

outlined our key concerns, centered around the need for clear, meaningful improvements in land management on behalf of nature to address the concurrent biodiversity loss and climate crises, avoiding the pitfalls of market-based tools and the use of problematic definitions of working landscapes, and presenting measurable goals and actions with clear next steps for implementation. Our concerns are followed by our recommended, collaborative vision for a tailored, home-grown nature strategy to position Alberta as a leader, while conserving nature in the interest of Albertans.

Clearly Committing to Nature Conservation:

National biodiversity strategies and action plans are the main tools for implementing the Kunming-Montreal Global Biodiversity Framework (GBF), which is comprised of globally agreed upon effective strategies to address biodiversity loss and conserve and protect nature. These plans must incorporate “concrete actions, policies, and programs” to contribute to local, national, and global biodiversity goals and targets.¹ Subnational plans, such as Alberta’s Nature Strategy, are essential to the successful implementation of the GBF and meeting the localized needs of citizens through nature conservation. Forty-four nations have nature strategies registered, and over 50 others recently submitted strategies at COP16. Multiple provinces and territories within Canada, including Quebec, Manitoba, British Columbia, and the Yukon, have committed to the GBF. Sub-national governments and coalitions worldwide such as the Subnational Task Force of the High Ambition Coalition – which includes subnational governments such as Québec, Scotland, Campeche, São Paulo, and California - are leading efforts to advance nature conservation and reverse biodiversity loss by developing and implementing bold, impactful strategies. For example, Quebec recently released a [nature plan](#) with clear goals and targets, accompanied by an [action plan](#).

The goal of any Nature Strategy must first and foremost be to halt and reverse biodiversity loss, and this should be clearly stated. If this is not the clear primary goal of Alberta's Nature Strategy, the province will be sorely out of line with the rest of the world. Currently, the information accompanying the Nature Strategy engagement and the panel discussions at the Nature Summit on October 16 lack real clarity on the Government of Alberta’s intentions for a nature strategy.

¹ UN Environmental Programme. Decision adopted by the Conference of the Parties to the Convention on Biological Diversity. <https://www.cbd.int/doc/decisions/cop-15/cop-15-dec-06-en.pdf>.



CPAWS Southern Alberta
Suite 310, 105 12th Avenue SE
Calgary, Alberta, T2G 1A1
infosab@cpaws.org
cpaws-southernalberta.org

CPAWS Northern Alberta
7 Sir Winston Churchill Square
Edmonton, Alberta, T5J 2V5
infonyab@cpaws.org
cpawsnab.org

Meaningfully Improving Nature Conservation:

Trending biodiversity loss and climate impacts suggest that meaningful improvements in land and wildlife management are necessary - simply acknowledging what is currently being done will not be sufficient. Alberta's Nature Strategy must go beyond outlining current environmental data collection, monitoring, mitigation, education, and adaptation processes to prevent and recover species and vital ecosystems. Preventative and long-term conservation measures such as increasing protected areas, completing land use planning, implementing species recovery plans, restoring habitat, and creating updated, strong environmental regulations are critical for nature conservation improvements in line with the interests of Albertans.

Focusing only on the recognition of existing land management efforts and heavy reliance on market-based solutions ignores the fact that current land management practices contribute to cumulative negative ecological impacts and the evidence that current efforts to maintain and restore biodiversity in Alberta are failing.

Addressing Biodiversity Loss and Climate Change:

Alberta has seen precipitous declines in the quality and quantity of native ecosystems, which has driven species decline across the province. Over 90 Albertan species are on the Species at Risk list. For example, caribou populations continue to decline, while plans for their recovery have yet to be implemented, and the rate of habitat loss has accelerated.² For species that are not yet listed as threatened, there is an urgent need to act to prevent population declines before reaching the point of threatened status.

The interlinked nature of the global biodiversity loss and climate change crises requires addressing the root causes of both. Alberta's Nature Strategy must acknowledge how the two are part of the same complex problem. Both must be addressed simultaneously to avoid incompletely identifying, understanding, and dealing with their connections, as well as inadvertently preventing the solutions of one or the other, or both issues. Each are unique and complex, requiring specialized attention amidst an understanding of their interconnectedness.

While climate adaptation measures are important, they do not necessarily address the underlying causes behind the issues or reduce the need for biodiversity conservation. Alberta's

² Nagy-Reis, M., Dickie, M., Calvert, A. M., Hebblewhite, M., Hervieux, D., Seip, D. R., Gilbert, S. L., Venter, O., DeMars, C., Boutin, S., & Serrouya, R. (2021). "Habitat loss accelerates for the endangered woodland caribou in western Canada." *Conservation Science and Practice*, e437. DOI: 10.1111/csp2.437



CPAWS Southern Alberta
Suite 310, 105 12th Avenue SE
Calgary, Alberta, T2G 1A1
infosab@cpaws.org
cpaws-southernalberta.org

CPAWS Northern Alberta
7 Sir Winston Churchill Square
Edmonton, Alberta, T5J 2V5
infosab@cpaws.org
cpawsnab.org

Nature Strategy should include increasing protected areas – notably Indigenous Protected and Conserved Areas - and preventing habitat loss and degradation for species at risk as core components, which create simultaneous climate benefits. Actions that focus on climate, but harm nature are not solutions in the long run. Only by “considering climate and biodiversity as parts of the same complex problem... can solutions be developed that avoid maladaptation and maximize the beneficial outcomes.”³

Cautioning Market-Based Tools and Working Landscapes:

At the recent Nature Summit, the three panels focused on working landscapes, (economically) valuing nature, and the economy. While important considerations, these topics do not address the true emphasis that must be placed on conservation and sustainability when recognizing the close ties and reliance of Alberta’s economy and health on nature.

A focus on economics and market forces is not sufficient to conserve Alberta’s natural spaces and resources. A price cannot properly be put on nature and all of its benefits. While some market solutions may be worth exploring, tools that attach a monetary value to nature should be explored with extreme caution and not as the sole or primary means to conserve nature. There must be an understanding of the challenges to fully describing and quantifying all benefits of functioning ecosystems, and of the urgency of ambitious actions to strengthen nature protection and restoration.

Some mechanisms to compensate private landowners for conservation measures may be successful in specific circumstances. For example, conservation easements, if administered correctly, can provide an upfront payment for ecosystem services while providing security for landowners and conservation. However, the acquisition of private lands for conservation is expensive relative to the area conserved. 60% of Alberta is composed of public lands and the scale of the problem will require increased permanent protection of public lands.

Relying on “working landscapes” as a conservation tool without major changes to how they are managed will not address biodiversity loss in the province. Many of the activities on

³ Pörtner, H.O., Scholes, R.J., Agard, J., Archer, E., Arneeth, A., Bai, X., Barnes, D., Burrows, M., Chan, L., Cheung, W.L., Diamond, S., Donatti, C., Duarte, C., Eisenhauer, N., Foden, W., Gasalla, M. A., Handa, C., Hickler, T., Hoegh-Guldberg, O., Ichii, K., Jacob, U., Insarov, G., Kiessling, W., Leadley, P., Leemans, R., Levin, L., Lim, M., Maharaj, S., Managi, S., Marquet, P. A., McElwee, P., Midgley, G., Oberdorff, T., Obura, D., Osman, E., Pandit, R., Pascual, U., Pires, A. P. F., Popp, A., Reyes García, V., Sankaran, M., Settele, J., Shin, Y. J., Sintayehu, D. W., Smith, P., Steiner, N., Strassburg, B., Sukumar, R., Trisos, C., Val, A.L., Wu, J., Aldrian, E., Parmesan, C., Pichs-Madruga, R., Roberts, D.C., Rogers, A.D., Díaz, S., Fischer, M., Hashimoto, S., Lavorel, S., Wu, N., Ngo, H.T. 2021. IPBES-IPCC co-sponsored workshop report on biodiversity and climate change; IPBES and IPCC. DOI:10.5281/zenodo.4782538.



CPAWS Southern Alberta
Suite 310, 105 12th Avenue SE
Calgary, Alberta, T2G 1A1
infosab@cpaws.org
cpaws-southernalberta.org

CPAWS Northern Alberta
7 Sir Winston Churchill Square
Edmonton, Alberta, T5J 2V5
infonab@cpaws.org
cpawsnab.org

unprotected public landscapes where extractive industries occur are the primary driver of biodiversity loss and diminished ecosystem health across Alberta due to high levels of cumulative disturbance and resulting habitat loss or degradation. The definition of a “working landscape”, as applicable to a sustainably grazed grassland, is not the same as an industrial use of public lands. These types of land uses should not be grouped together using “working landscapes” as a blanket tool. Only areas with meaningful and measurable management tools - where industrial disturbances are absent or minimal, permanent, enforceable limits on future disturbance are in place and conservation benefits are achieved - ought to be recognized.

Implementing Evidence-Based and Measurable Actions:

Alberta’s Nature Strategy must be science and evidence-based and include goals and measurable actions to achieve these. Proven tools, such as parks and protected areas, comprehensive land use planning, and habitat restoration, are required to ensure successful outcomes. While taking a creative approach and exploring new mechanisms to conserve nature may be beneficial, all actions must be strategic and based on sound evidence. Any new mechanisms ought to be explored as additional, opposed to core, tools to reach the strategy’s clear goals and objectives. Creative initiatives to get community buy-in could be explored such as a process for public submission of new protected area proposals similar to Special Places 2000 or the initiative conducted this year in [Quebec](#).

Collaboratively Moving Forward:

A set of strong guiding principles, as included in our collaborative vision, should be integrated into Alberta’s Nature Strategy and must be accompanied by an action plan to ensure successful and timely implementation.

As development of the strategy progresses, we expect to see the next phase of consultation for the draft strategy and an accompanying action plan. Public, stakeholder, and Indigenous feedback should be clearly incorporated. It is crucial that the action plan be developed simultaneously with the strategy to ensure both are well-aligned and integrated. The action plan should detail how it will be applied by all ministries, how indicators of nature protection and biodiversity recovery will be monitored, and how findings and community involvement will adaptively inform future implementation.

Clarity must be given regarding how Alberta’s Nature Strategy will integrate with other land use decision making processes and how other ministries will incorporate the plan. Following development, implementation of Alberta’s Nature Strategy must include rollout of the action plan, accompanied by sufficient funding. The process must include continuous involvement



CPAWS Southern Alberta
Suite 310, 105 12th Avenue SE
Calgary, Alberta, T2G 1A1
infosab@cpaws.org
cpaws-southernalberta.org

CPAWS Northern Alberta
7 Sir Winston Churchill Square
Edmonton, Alberta, T5J 2V5
infonab@cpaws.org
cpawsnab.org

and engagement with Albertans including robust consultation with Indigenous communities, and continued engagement with civil society. We emphasize the importance of recognizing the importance of Indigenous ways of knowing and leadership and community involvement in collaboratively maintaining and restoring biodiversity respectfully and successfully.

A Vision for Alberta's Nature Strategy:

Ultimately, a nature strategy for Alberta must aim for a future where the province's biodiversity, ecosystems, and ecological integrity have improved, and are no longer in crisis. This outcome requires ambition and prioritizing additional actions. The nature strategy cannot be an exercise in reiterating the status quo. Business as usual will fail to recover species at risk and safeguard the clean air and water that wildlife and humans alike need to survive and thrive.

As indicated in *[A Collaborative Vision for Alberta's Nature Strategy](#)* (attached), a unified vision among more than a dozen Alberta organizations concerned about nature, we are calling on the Government of Alberta to develop a Nature Strategy that embodies a commitment to doing better on behalf of nature and Albertans. This strategy must commit to halting and reversing biodiversity loss through the prioritization of the following pathways:

1. Comprehensive land use planning
2. Expanded network of parks and protected areas
3. Indigenous-led conservation
4. Habitat conservation and restoration
5. Sustainable economic opportunities
6. Nature-based climate solutions

And guiding principles:

1. **Meaningful Action:** Commit to implementing clear actions that will result in tangible change for nature and are aligned with the interests of Albertans.
2. **Effective Conservation:** Contribute towards reaching the targets of the Kunming Montreal Global Biodiversity Framework, with a commitment to measuring and meeting the indicators for the targets each pathway is associated with.
3. **Reconciliation:** Respect and recognize the importance of Indigenous-led conservation, values, knowledge, and Treaty Rights.
4. **Community Involvement:** Ensure accountability and transparency through meaningful engagement with communities.



CPAWS Southern Alberta
Suite 310, 105 12th Avenue SE
Calgary, Alberta, T2G 1A1
infosab@cpaws.org
cpaws-southernalberta.org

CPAWS Northern Alberta
7 Sir Winston Churchill Square
Edmonton, Alberta, T5J 2V5
inforab@cpaws.org
cpawsnab.org

5. Sustainability: Support long-term conservation and climate action, while empowering sustainable economic opportunities.
6. Comprehensive Planning: Conduct holistic planning and decision-making processes, accounting for all aspects of biodiversity and climate change

For more detail on our vision for Alberta's Nature Strategy please review [*A Collaborative Vision for Alberta's Nature Strategy*](#). Thank you in advance for considering our input into the development of Alberta's Nature Strategy. We would like to a meeting to discuss our input in more detail.

Sincerely,

Chloe Hahn, Conservation Coordinator, CPAWS Southern Alberta

Katie Morrison, Executive Director, CPAWS Southern Alberta

Kecia Kerr, Executive Director, CPAWS Northern Alberta

Tara Russell, Program Coordinator, CPAWS Northern Alberta

cc: Todd Loewen - Minister of Forestry and Parks
Sherri Wilson, Deputy Minister, Environment and Protected Areas
Andrew Horton, Assistant Deputy Minister, Lands Division
Kim Lalonde, Executive Director, Lands Planning Branch
Scott Milligan, Executive Director, Lands Policy and Programs Branch