



Business Council of
British Columbia

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Via email: ENVI@parl.gc.ca
(Original to follow by mail)

Ms. Marie-France Renaud
Clerk of the Standing Committee on
Environment and Sustainable Development
Parliament Buildings
Ottawa, Ontario

Dear Ms. Renaud,

RE: DEVELOPMENT OF A NATIONAL CONSERVATION PLAN FOR CANADA

The Business Council of British Columbia (the Council) is pleased to offer our comments on the development of a national conservation plan. Established in 1966, the Business Council is an association representing approximately 250 large and medium-sized enterprises engaged in business in British Columbia. Our members are drawn from all major sectors of the provincial economy. Taken together, the corporate members and the associations affiliated with the Business Council are responsible for approximately one-quarter of all jobs in British Columbia. The Council has a longstanding interest in environmental policy and regulatory matters.

The Province of British Columbia has been active on conservation and the protection of species and ecosystems. In the 1990s, BC went through an extensive land-use planning process that led to setting aside 14% of the land-base and the establishment of the *Protected Areas of British Columbia Act*. BC also has supporting legislation, namely, the *Park Act*, *Ecological Reserves Act*, *Environment and Land Use Act* and *Wildlife Act*, that enables a system currently made up of over 900 designated parks and protected areas, totaling over 13,000,000 hectares. The system of parks/protected areas includes: class A, B and C parks; conservancies; recreation areas; ecological reserves; protected areas; wildlife management areas; and other undesignated conservation lands for fish and wildlife. The Convention on Biological Diversity has a target of 17% for lands, so BC is already more advanced than many countries and other provinces in Canada in reaching this admittedly ambitious target.

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Within the marine-scape, in 2004, under Canada's *Oceans Act*, in a memorandum of understanding between British Columbia and Canada, the BC Ministry of Environment and the Department of Fisheries Oceans initiated the Marine Protected Areas Implementation Team. The objective of the work plan for this initiative is to increase linkages between provincial and federal marine protected areas, as well as to identify new possible marine protected area candidates.

There are also two coastal planning processes currently underway in BC – one on the west coast of Vancouver Island, and one in the Pacific North Coast Integrated Management Area, which extends from the tip of northern Vancouver Island to Haida Gwaii. Combined, these processes cover the entire west coast of British Columbia, while on the south coast Parks Canada is continuing to investigate the feasibility of a National Marine Conservation Area in the Strait of Georgia, which could go as far as to include discussions around the protection of Orca Whales. At the moment and in total, BC has 148 provincially-designated marine protected areas (128 parks and protected areas and 20 ecological reserves); when combined with existing federal marine protected areas, this covers no less than 21% of BC's shoreline, compared to 10% of lands and 1% of oceans nationally.

From an overall perspective, in 2009 BC established a Conservation Framework (<http://www.env.gov.bc.ca/conservationframework/>) that lays out three goals and a framework for collaboration and decision-making related to prioritizing species and ecosystems for conservation and determining the most appropriate and effective management actions. Finally, in 2010 the Department of Fisheries and Oceans released the National Framework for Establishing and Managing Marine Protected Areas.

Clearly then, British Columbia is a leader and partner with federal agencies in identifying and establishing both land and marine conservation and protected areas. It is the Business Council's view that the policy context, objectives and processes for identifying future conservation and protected areas is firmly entrenched within the current policy and regulatory construct in BC, and is also supported by public values. When existing federal programs are added to the mix, we do not see a need for another federal government framework or plan addressing conservation, especially if it would result in further layers of policy or administration.

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However, in the event that Canada does choose to develop a National Conservation Plan, the federal government will need to clearly identify what the plan is intended to accomplish in order to ensure participation, support and cooperation over the long term by the provinces, business, and affected local communities.

We urge you to consider the following matters as you deliberate further:

- Ensure there are no more than three measurable, succinct and discrete objectives that do not compete with but instead complement provincial objectives;
- Provide for a transparent process that does not create additional administration or require new resources or new processes in order to be implemented;
- Enable explicit recognition of trade offs and the use of tools that create a platform for dialogue and record keeping about choices;
- Use science and knowledge to inform and integrate decision-making, leveraging existing data sets from the provinces and universities;
- Develop partnerships with provinces, business, First Nations, communities and ENGOs to make efficient use of limited resources, reduce overlap and duplication, and acknowledge work that has already been done or is being done; and,
- Ensure there is alignment with current legislation and regulations.

The Business Council supports maintaining the integrity of ecosystems and the protection of endangered and threatened species. We understand that the long-term health of the economy is dependent upon our ability to extract, transform and use our natural resources within a framework of good stewardship and science-driven decision-making.

We would be pleased to participate in additional conversations on this topic.

Yours sincerely,

*Original signed by
Greg D'Avignon*

Greg D'Avignon
President and Chief Executive Officer

DD/vjc