



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

November 18, 2016

The Honourable Catherine McKenna
Minister of Environment and Climate Change
ec.ministre-minister.ec@canada.ca

Sue Milburn-Hopwood
Assistant Deputy Minister, Canadian Wildlife Service
Environment and Climate Change Canada
sue.milburn-hopwood@canada.ca

RE: Listing Policy for Terrestrial Species at Risk

Dear Minister McKenna:

Thank you for the opportunity to contribute to the Species At Risk Act Listing Policy for Terrestrial Species at Risk.

Alberta Wilderness Association (AWA) works throughout Alberta towards more representative and connected protection of the unique and vital landscapes that are the source of our clean water, clean air and wildlife habitat. We have been working in Alberta for more than fifty years to raise the profile of Alberta's spectacular wilderness. With over 7,000 members and supporters in Alberta and across Canada, AWA remains committed to ensuring protection of wildlife and wild places in Alberta for all Canadians.

AWA is of the opinion that the Listing Policy for Terrestrial Species at Risk does not comply with the Species At Risk Act (SARA).

We believe that the policy as currently drafted may potentially delay listing decisions for Species at Risk indefinitely and will likely contribute to further declines of these species. Under Section 27 of SARA, there is a nine-month timeline after COSEWIC's assessment to make a listing decision. This nine-month time limit **does not** require an order acknowledging that the assessment has been received.

Delaying listing is against the very purpose of SARA, which is to prevent wildlife species from being extirpated or becoming extinct, to provide for the recovery of wildlife species that are extirpated, endangered or threatened as a result of human activity and to manage species of special concern to prevent them from becoming endangered or threatened. Currently, there are over 100 species for which listing decisions are overdue.

In conclusion, we are concerned about the proposed SARA Listing Policy for Terrestrial Species at Risk, as it is currently written. Species at Risk, especially those assessed as threatened or endangered need timely listings in order to promptly undertake necessary recovery actions. Delaying will only make recovery of these species more costly and difficult, and in other cases may even lead to their extinction. We look forward to a reply at your earliest convenience.

Sincerely,
ALBERTA WILDERNESS ASSOCIATION

Executive Director

cc:

Species at Risk Public Registry Office, ec.registrelep-sararegistry.ec@canada.ca

The Honorable Shannon Phillips, Alberta Minister of Environment and Parks, AEP.Minister@gov.ab.ca