



Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

Strategic Priorities
Canadian Wildlife Service
Environment and Climate Change Canada
15th Floor, Place Vincent Massey
351 St. Joseph blvd.
Gatineau, QC K1A 0H3
Via e-mail: ec.eccc-caribou.ec@canada.ca

September 6, 2019

**Re: Draft Agreement for the Conservation of the Woodland Caribou, Boreal population
with Cold Lake First Nations**

Dear Strategic Priorities Group:

Alberta Wilderness Association (AWA) welcomes the opportunity to provide these comments on the draft Agreement for the Conservation of the Woodland Caribou, Boreal population with Cold Lake First Nations ("the draft Agreement"), under section 11 of the *Species at Risk Act (SARA)*.

Founded in 1965, 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. 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 very supportive of this draft Agreement. It is an important step to enhance Cold Lake First Nations' capacity and leadership to recover woodland caribou within its traditional territory in northeast Alberta and northwest Saskatchewan.

The draft Agreement's "Shared Recovery Objective" is laudable. We are pleased that it states support for the achievement of a self-sustaining caribou population in the Cold Lake caribou range, consistent with the population and distribution objectives in the federal boreal woodland caribou Recovery Strategy.

We believe that cooperative measures to advance habitat conservation and habitat restoration will be important for the survival and recovery of this caribou population.

A major concern is that the Alberta government, with its jurisdiction over provincial lands, is not a party to this draft Agreement. We encourage all parties' efforts to ensure that Alberta is represented on the Governance Committee outlined in s. 6 of the draft Agreement.

We note that a separate funding agreement will be made. A funding agreement is key to ensuring successful implementation of this agreement. We suggest that the funding agreement should cover the period to the March 2023 Agreement expiry.

We would prefer to see stronger provisions in the Termination section. The ability to terminate in 90 days raises doubts about the longevity of this process and whether the planned measures can be completed. We recommend the Agreement outline a collaborative process that is difficult to extinguish for at least several years, with layers of dispute resolution mechanisms.

Finally, AWA believes this agreement in no way substitutes for the federal Environment Minister's and federal government's responsibilities to protect critical habitat under s. 61 of the *Species at Risk Act (SARA)*. Caribou urgently need interim federal orders on unprotected provincial lands. These interim measures would spur governments, in collaboration with indigenous communities, to actually complete and implement legally enforceable range plans that achieve at least minimum caribou habitat requirements.

Thank you for considering these comments.

Sincerely,
ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in black ink that reads "Carolyn Campbell". The signature is written in a cursive style and is underlined with a single horizontal line.

Carolyn Campbell
Conservation Specialist

cc: Hon. Catherine McKenna, Minister of Environment and Climate Change Canada
MP Sean Fraser, ECCC Parliamentary Secretary
Niall O'Dea, Associate Assistant Deputy Minister, Canadian Wildlife Service, ECCC
Hon. Jason Nixon, Minister of Alberta Environment and Parks
Bev Yee, Deputy Minister, Alberta Environment and Parks
Ronda Goulden, ADM Policy and Planning, Alberta Environment and Parks