



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

January 15, 2024

Nature 2030 Team  
Environment and Climate Change Canada  
By email: [nature2030@ec.gc.ca](mailto:nature2030@ec.gc.ca)

**RE: Comments on National Biodiversity Strategy Milestone Document**

To the Nature 2030 Team:

Alberta Wilderness Association (AWA) appreciates the opportunity to provide comments on the National Biodiversity Strategy Milestone Document. Founded in 1965, AWA strives to help Albertans understand the intrinsic values that wildlife and wilderness provide and encourage communities to participate in conservation initiatives that will ensure a legacy for future generations. With over 7,500 members and supporters in Alberta and beyond, AWA is dedicated to conserving Alberta's wilderness, and advocating for conservation strategies that protect Canada's biodiversity.

AWA supports the increased accountability and work towards concrete efforts for halting and reversing biodiversity loss that are outlined in the Milestone Document. We welcome also that protection of high biodiversity areas remains a priority and incorporating Indigenous knowledge and diversity is emphasized. We suggest sections of the document could be strengthened regarding restoration, prioritization of economic growth, and responsibility for biodiversity, and we would like to see specified commitments and timelines towards Canada's biodiversity goals. Our detailed comments are provided below.

*Protection of High Biodiversity Areas*

Biodiversity generally reflects the health of an ecosystem, and areas of high biodiversity are most commonly found in ecosystems that have had hundreds or thousands of years to develop. Protection of native ecosystems is vital to maintain biodiversity, support ecosystem services and function, and prevent the extinction of more species (Target 1, 3, 11). This is particularly true for endangered ecosystems such as grasslands, wetlands, and alpine habitats.

We applaud the aim for "well-connected, equitably governed, ecologically representative protected and conserved areas covering at least 30% of its terrestrial and marine areas" (Target 3), although we are disappointed that Canada has chosen to adopt a targeted biodiversity loss of "close to zero by 2030" (Target 1). As reported by the Auditor General in 2022, biodiversity loss in Canada has reached crisis proportions, and despite repeated warnings, Canada's efforts to protect many endangered species have fallen short. The aim should be to prevent further biodiversity loss immediately. For many species, the greatest threat is a loss of habitat.

We would like to emphasize that protected and conserved areas must be representative and must focus on entire ecosystems rather than individual species. Currently, a significant portion of Canada's protected areas lies in the north. In Alberta, while 60 percent of the Rocky Mountains and 73 percent of the Canadian Shield is protected, the grassland, parkland and foothills region all have less than 1.5 percent protection. Many areas have already been identified as important for biodiversity, such as Canada's Key Biodiversity Areas and Ecologically Significant Areas in Alberta, but lack legislated

protection. Opportunities for expanding protected areas in the underrepresented regions should be sought and accelerated (Target 1, 3, 4).

In Alberta, one such opportunity may be in the expansion of the Twin River and Onefour Heritage Rangelands. These areas support extensive native prairie, and their potential expansion was included in the South Saskatchewan Regional Plan<sup>1</sup>. Another opportunity for a new protected area in Alberta is the Bighorn. Much of this biodiverse area was once included in national parks, and it was promised for protection as a Wildland Provincial Park by the Alberta government in 1986. To date, the promised expansions and protected designations have not occurred.

There are also opportunities on federal land. For instance, Canadian Forces Base Suffield is considered one of the largest contiguous blocks of uncultivated grassland remaining in the prairies. The establishment of a National Wildlife Area (NWA) acknowledged the importance of this area for biodiversity. Incorporating greater Indigenous access and stewardship within management for Suffield NWA would advance reconciliation objectives, as well as bringing Indigenous understanding of the land that could improve biodiversity and ecosystem health. The area of land is also sufficiently large to consider bison reintroduction, a keystone species important to grassland health and a critical part of Indigenous culture.

In addition, stronger protection and enforcement of policy is needed for wetlands and peatlands, including the McClelland Lake Wetland Complex, that are at risk of being drained. Although many provinces, including Alberta, have a wetland policy or strategy for conservation of wetlands, wetlands are still being lost at an alarming rate. Wetlands are one of the most productive ecosystems worldwide, and are important as carbon stores. In Canada, an estimated 70 percent of wetlands have already been lost, and more are drained each year for agriculture or urban and industrial development. The *Federal Policy on Wetland Conservation* and *Alberta Wetland Policy* acknowledge the importance of wetlands and promise no net loss of wetlands or wetland functions, yet drainage of wetlands continues. Stronger protections are required to prevent further loss.

Finally, migration corridors in Canada are understudied. Migration is critical to the survival of many animals, and migration can be a particularly vulnerable time. For bat and bird species, renewable energy generators, light pollution, roads and fencing, loss of stopover sites and extreme weather are all human-influenced obstacles that can reduce migrant survival. Urban areas are also important for migration and connectivity of sites, particularly as cities expand into neighbouring lands, and retaining green spaces and ecological corridors is important for both biodiversity and human health (Target 12). Identifying common migration paths, as well as understanding how paths may vary from year to year, will be important in maintaining these areas for migrant species.

### *Restoration of degraded areas*

Restoration of degraded ecosystems is important for improving biodiversity. In many regions, native habitats are fragmented, with several species struggling to survive in a greatly reduced habitat area. Restoration is vital for expanding the available habitat, however, it should not replace protection for areas containing high biodiversity and healthy ecosystems. Many high biodiversity ecosystems are found only in undisturbed, millennia-old ecosystems, such as old growth forests or native grasslands. These

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<sup>1</sup> Government of Alberta. 2018. South Saskatchewan Regional Plan 2014-2024. Available at: <https://landuse.alberta.ca/LandUse%20Documents/South%20Saskatchewan%20Regional%20Plan%202014-2024%20-%20May%202018.pdf>

ecosystems are difficult or impossible to restore, and doing so requires extensive effort, resources and time.

AWA strongly agrees with the statement “While avoiding land conversion and preventing degradation is more effective and cost efficient for biodiversity conservation, restoration is the mechanism to improve ecosystems once they have been degraded” (Target 2). Restoration should especially be focused on areas that are important for connectivity or for expanding habitat ranges. We are pleased to see on-the-ground implementation as a focus, and local and Indigenous knowledge must be incorporated into addressing knowledge gaps and restoration. Restoration is more likely to fail where local context is not considered, and monitoring of restoration efforts is vital in achieving success<sup>2</sup>.

One difficulty with restoration that must be addressed is the cost and difficulty in obtaining native seeds. The cost of native seeds is often higher than for tame or introduced seed. Native plants, especially for the grasslands, can also be less competitive, and may require longer to establish. As a result, landowners, producers, developers and other decision-makers may be less motivated to use native seed over tame varieties. Programs to reduce or subsidize the cost of seed, as well as support during the re-establishment process, would provide greater incentive to restore native plants and endangered habitats over introduced species.

#### *Prioritization of environmental values*

AWA believes that the value of a healthy environment and ecosystems must be emphasized, and that short-term economic growth must not occur at the expense of long-term environmental benefits. To achieve this, biodiversity must be incorporated into decision-making processes. Land-use planning that considers cumulative effects of land-use and pollutants should be followed in developments, such as for housing, infrastructure, industry, or resource extraction. Canada should work to enshrine ecological and environmental health as a primary value, and educating Canadians about the importance of biodiversity will be instrumental to achieving this shift in values.

Overexploitation is one consequence of prioritizing economic growth over environmental health (Target 5, 9, 10, 16). Harvest of species, such as through fishing, hunting, and logging, must be sustainable. There must be clear, science-based limits that are enforced, and these limits should be founded on current monitoring data that accurately reflects changing populations. Harvest of species should not only be sustainable for continued harvest, it should also be sustainable for the ecosystem and the species that rely on it. For instance, the loss of old growth forest has severely impacted caribou populations, which rely on the lichens that are not found in younger, regenerating forests.

The use and release of pollutants, often to encourage higher profit, can severely degrade natural systems (Target 7). These pollutants include improperly disposed products of manufacturing and resource extraction, as well as agricultural products such as pesticides and fertilizers. Monitoring and enforcement of dangerous substances and pollutants is severely lacking<sup>3</sup>, and stronger enforcement for proper use, handling and disposal is needed.

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<sup>2</sup> Suding, K.N., 2011. Toward an era of restoration in ecology: successes, failures, and opportunities ahead. Annual review of ecology, evolution, and systematics, 42, pp.465-487.

<sup>3</sup> I.e. Pesticide Management. 2022. Auditor General of Alberta. Available at: <https://www.oag.ab.ca/reports/oag-environment-pesticide-mgmt-mar-2022/>

In addition, the socio-economic benefits of old-growth forests, native prairie, and other habitats must be accounted for. There have already been several studies assessing the value of nature protection. For instance, an independent study in British Columbia found that protecting old-growth forests on Southern Vancouver Island would contribute \$40 million more in economic benefits than prioritizing logging<sup>4</sup>. A report by the University of Manitoba suggested that grasslands provided a socio-economic value of roughly \$700 million to \$2,515 million per year<sup>5</sup> (Target 14).

As well as recognizing the value of habitats, incentives can encourage choices to preserve biodiversity and native ecosystems (Target 18, 19). For instance, there are currently few incentives to support maintaining rangelands with native prairie, rather than converting prairie lands to cropland or for energy development. Clean Fuel Regulations, while well-intentioned, could increase crop prices and encourage land conversion. Subsidies for development, such as oil and gas, encourage exploration in less productive regions, frequently causing high environmental harm. Canada has taken a positive first step by restricting fossil fuel subsidies, although there are still concerns with the allowance of natural gas and carbon capture technologies that could cause more harm<sup>6</sup>. Funds should be redirected to conservation and restoration efforts to improve biodiversity.

Unlimited economic growth is not sustainable with the finite resources of the planet (Target 7, 16). Building a circular economy and encouraging sustainable consumption could help to reduce overconsumption and waste. We support using “upstream interventions,” “regulatory levers” and transforming government “operations and policies” to transition to a circular economy.

Environmental claims need to be carefully monitored and substantiated with data to avoid harm caused by greenwashing. For instance, the Sustainable Forestry Initiative (SFI) has been criticized by environmental groups in Canada and the United States for failing to adequately measure or result in sustainability outcomes, and for making false environmental claims to Canadians. A complaint was submitted by several environmental groups in 2022 to the Competition Bureau of Canada due to SFI’s misleading and false claims.<sup>7</sup> Sustainability certificates such as these should be actively evaluated to ensure they have robust standards that lead to measurable sustainability outcomes. Otherwise, Canadians may lose trust in sustainability certification.

Product repair reduces the need for new materials, and allows products to be used for longer. Allowing products to be repaired involves introducing the right-to-repair which allows products to be repaired independently. Manufacturers also have a responsibility to make items repairable by allowing components to be easily accessed for removal, and providing common parts. Incentives for repairing or recycling devices would also reduce the desire to purchase new items frequently, contributing to unsustainable levels of waste.

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<sup>4</sup> ESSA. 2021. Economic Valuation of Old Growth Forests on Vancouver Island. Available at: <https://ancientforestalliance.org/wp-content/uploads/2022/02/Economic-Value-of-Old-Growth-Report-Web.pdf>

<sup>5</sup> Glaser, A., 2014. America’s grasslands: the future of grasslands in a changing landscape. In Proceedings of the 2nd Biennial Conference on the Conservation of America’s Grasslands. National Wildlife Federation and Kansas State University.

<sup>6</sup> Jacobson, M.Z., 2019. The health and climate impacts of carbon capture and direct air capture. *Energy & Environmental Science*, 12(12), pp.3567-3574.

<sup>7</sup> Ecojustice. 2022. Application for inquiry: false and misleading representations by the sustainable forest initiative about their forest certification standard. Available at: <https://ecojustice.ca/wp-content/uploads/2022/12/SFI-CB-Complaint-Final.pdf>

### *Inclusion and Diversity*

As the Milestone Document states, a “whole-of-government, whole-of-society approach” is crucial to restoring biodiversity. In particular, the inclusion of voices from vulnerable populations must be present (Target 22). These populations, including Indigenous peoples and minorities, are often most impacted by biodiversity loss and climate disasters. We support funding for capacity building and knowledge sharing in partnership with these groups, and appreciate the inclusion of Indigenous knowledge alongside western science in decision-making. We are strongly in favor of benefits, including ecosystem services and genetic resources, being shared equally, and would like to see greater public input included during development decisions (Target 13, 15, 21). We hope to see these points amplified more broadly, with populations that have been previously dismissed given greater consideration in decisions that impact all Canadians.

Thank you for considering our comments. We look forward to the publication of the final National Biodiversity Strategy.

Sincerely,  
ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in black ink that reads "Ruiping Luo". The signature is written in a cursive, flowing style.

Ruiping Luo  
Conservation Specialist