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The Hon Rebecca Schulz, ECA, MLA
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Alberta's Nature Strategy

Alberta Wilderness Association and Nature Canada warmly welcome the Government of Alberta's recent announcement that it will create a made-in-Alberta nature strategy, to protect and restore the province's natural heritage.

We recognize that more than three-quarters of Canada's lands and waters are under provincial and territorial jurisdiction, and that as a result, much of the leadership necessary to conserve those resources must come from provincial and territorial governments. We were also encouraged by Alberta's commitment to develop its nature strategy in consultation with Albertans who live and work with the province's lands and waters.

We are writing to you today as provincial and national organizations committed to the protection and restoration of nature across Alberta and Canada. We believe that the constructive and respectful relationship between our two organizations models the constructive and respectful nation-wide partnerships necessary to steward nature.

Alberta Wilderness Association (AWA) was founded in 1965, to help Albertans understand the intrinsic values that wildlife and wilderness provide, and to encourage communities to participate in conservation initiatives that will ensure a legacy for future generations of Albertans. 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.

Nature Canada is one of Canada's oldest conservation organizations, and was established in 1939. We rally together more than 250,000 individual Canadians and a network of more than 1,200 organizations, across every province and territory including Alberta.

We recognize that the federal government's announcement of its 2030 Nature Strategy and the accompanying federal-provincial-territorial meeting on nature were not without challenges for intergovernmental cooperation. We believe that this only increases the importance that each level of government demonstrates meaningful leadership and progress in its own sphere of constitutional responsibility.

We would like for the Government of Alberta to commit to working on the following goals and objectives:

1) **Nature Strategy:** We appreciate the effort towards an Alberta-focused Nature Strategy; we would like to see a strategy with clear, concrete goals and actions, with timelines for monitoring, reporting on, and achieving goals. The Strategy should include commitments and funding to protect high biodiversity regions, particularly in underrepresented and endangered ecosystems like parklands, grasslands, and foothills, as well as commitments to restoration of degraded areas and expansion of habitat. For a successful biodiversity strategy, the value of nature and ecosystem services needs to be acknowledged and prioritized over short-term commercial activities. Such a made-in Alberta Nature Strategy would support the protection and restoration of Alberta's natural heritage, while also showcasing how provinces can collectively help lead Canada's achievement of nationwide conservation goals.

2) **Spatial Planning and Effective Management (Target 1):** Management of cumulative effects is particularly important across the landscape, and the completion of regional and subregional planning would help to address cumulative effects. To date, Alberta has completed only two of seven regional plans. These plans should consider and set restrictions on development in regions of high biodiversity, already outlined in initiatives such as Alberta Environmentally Significant Areas Report, and Key Biodiversity Areas. Along with expansion of protected areas (detailed below), we would like to see a commitment to complete regional planning within a reasonable timeframe, ideally within the next decade.

3) **Ecosystem Restoration (Target 2):** Alberta has committed to restoring caribou habitat and is collaborating with partners to support watershed health, including through the Wetland Replacement Program and the Watershed Resiliency and Restoration Program. However, we continue to lose wetland and forest habitat, as remediation and replacement rarely achieves identical functionality to the destroyed lands. Restoration is needed on degraded landscapes; it should not be used as justification for continued ecosystem destruction. Alberta should acknowledge restoration is not able to replace centuries-old ecosystems, such as old growth forests, native grasslands, and peatlands, and must commit to the restoration of endangered habitats and ecosystems, while prioritizing protection of the remaining habitat. Restoration should be focused on areas that allow expansion of habitat ranges for endangered species, and not only on land that is convenient. Incorporating local and Indigenous knowledge is vital to this process.

4) **Protected and Conserved Areas (Target 3):** Habitat loss is one of the greatest drivers of biodiversity loss, and protecting high biodiversity areas and endangered ecosystems is vital to recovering biodiversity. We commend the Government of Alberta for working with Indigenous communities on cooperative management approaches to five woodland parks. We would like to see an expansion of protected areas, particularly in underrepresented regions. Protection must be representative and connected, and opportunities for expanding protection should be actively sought; one opportunity lies in the expansion of the Onefour and Twin River Heritage Rangeland Natural Areas as was promised in the 2014-2024 South Saskatchewan Regional Plan, though not yet acted on. Alberta must act quickly to protect the remaining native habitat in the underrepresented and endangered parkland, grassland and foothills ecoregions.

5) **Species Recovery (Target 4):** Alberta is investing in caribou habitat restoration and stewardship programs; however, little progress has been made to halt species at risk decline. Alberta's at-risk species have shown few signs of recovery, and processes and timelines for listing, monitoring, and producing recovery plans are vague and unclear. Alberta also does not have a dedicated Endangered Species Act; most of the province's species at risk are managed under the Wildlife Act, which primarily addresses hunting and harvesting. We would like to see Alberta commit to explicit timelines and actions towards addressing species at risk, as well as producing a dedicated Endangered Species Act that will drive the recovery of at-risk species.

6) **Climate Change and Biodiversity (Target 8):** Climate change is intricately linked to biodiversity loss; the changing climate is affecting species range, seasonality, competition, and survival. Alberta is Canada's largest provincial emitter of carbon, and as such, has the greatest opportunity to lead the nation in the reduction of carbon emissions. Canada's 2030 Nature Strategy mentions Alberta is "committing to develop a framework to guide implementation of nature-based solutions as part of the Emissions Reduction and Energy Development plan." Alberta needs a clear pathway to reducing carbon emissions, for the benefit of environmental and human health, and for a chance to counter the costs of climate change.

7) **Nature Advisory Committee:** Setting goals and timelines will require that all of Alberta work together. We, therefore, recommend the establishment of an Nature Advisory Committee made up of scientists, Indigenous Guardians, and local community members, to help the government develop and set implementation guidelines and performance metrics. The committee should meet regularly to ensure that the monitoring of indicators demonstrates that actions being taken are contributing to the overall objectives and that timelines are being met, and regularly release publicly accessible reports on progress completed.

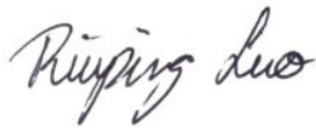
AWA and Nature Canada would be delighted to meet with you to discuss how we can support you, whether in the development of your own provincial plans, the mobilization of public support, or collaboration with other governments.

In addition, Nature Canada will be part of Canada's state delegation to the Sixteenth Meeting of the Conference of Parties (COP 16) to the Convention on Biological Diversity, which will be held in Cali, Colombia, from 21 October 2024 to 02 November 2024. We understand that the

government of Alberta intends to send a delegation to that meeting. We would welcome the opportunity for us to sit down together in Cali, to discuss how Canada can better ensure that all levels of government have a voice in deciding our country's international nature commitments and in maintaining systems of mutual peer accountability for their fulfillment.

If you need any additional information, please feel free to contact us at your convenience. We look forward to hearing from you.

Yours sincerely,



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**Alberta Wilderness
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cc. Hon. Danielle Smith
Ms. Sarah Elmeligi
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