

August 28, 2014

Honourable Leona Aglukkaq
Minister of Environment
Environment Canada
Minister's Office (TLC)
10, rue Wellington
Gatineau, Quebec K1A 0H3
Canada
Via email Minister@ec.gc.ca

Dear Minister Aglukkaq,

Re: Request to amend Bill C-40, draft federal legislation for the proposed Rouge National Urban Park

We are writing to express our serious concern that the draft federal legislation to create and manage the proposed Rouge National Urban Park, Bill C-40, does not provide adequate protection for the remarkable ecological values of Rouge Park. In fact, the standard of protection in the Rouge would be lowered from its current status if the Rouge National Urban Park is established under this Bill. As a result we are requesting that the Bill be amended.

A detailed legal review by Ecojustice, concluded that Bill C-40 affords significantly weaker natural environment protection than either the *Canada National Parks Act* or *Ontario's Provincial Parks and Conservation Reserves Act*.

The biggest problem with Bill C-40 is that it does not clearly prioritize nature conservation as the primary purpose of the park, or the top priority for park management. It only requires that the Minister "**take into consideration the protection of its natural ecosystems and cultural landscapes and the maintenance of its native wildlife and of the health of those ecosystems**" (bold added) in the management of the park.

Prioritizing the protection and restoration of ecological health and integrity, through a science-based approach, is an absolute necessity if future generations are going to be able to appreciate and enjoy the park. Prioritizing nature conservation is consistent with existing federal and Ontario parks legislation, and with the definition of a protected area according to international standards.

Based on the legal review, we identified five priority areas where we recommend amendments to Bill C-40:

1. Our highest priority amendment is that ecological integrity and health must be clearly stated as the first priority of the Minister in park management (section 6);
2. Imperative language is needed in the purpose section to signify the duty to preserve the parkland for future generations, and to dedicate the park to the people of Canada for their benefit (section 4);
3. Definitions are needed in the legislation for ecological integrity and health and science-based management (section 2);

4. In the management plan section of the Bill, ecological protection and restoration language should be included in the vision and objectives (section 9); and
5. The public consultation requirements should be broadened to include the development of parks policy and regulations (section 8).

The Memorandum of Agreement signed between Parks Canada and the Ontario government for the Rouge National Urban Park requires written policies that “*meet or exceed provincial policies regarding the transferred lands...*” Bill C-40 does not meet this test. The protection and restoration of ecological integrity is the stated priority for land use and resource management within existing Rouge Park, Greenbelt, Oak Ridges Moraine, Rouge Watershed and Great Lakes Water Quality improvement plans, and this is not the case for Bill C-40.

Given the significant shortcomings of the proposed Rouge National Urban Park legislation, we ask that you ensure amendments are put forward to address these weaknesses and "meet or exceed" the existing provincial policy framework. We would be pleased to share our suggestions for draft amendments with you in the coming weeks.

Please contact Leigh Paulsen at 416-208-0252 if you would like to meet to discuss our concerns.

Sincerely,

Tim Gray,
Executive Director, Environmental Defence



A handwritten signature in green ink that reads 'Carolyn Schultz'. The signature is written in a cursive, flowing style.

Carolyn Schultz,
Executive Director, Ontario Nature



Jim Robb, Friends of the Rouge Watershed



Faisal Moola,
Director General, Ontario and Northern Canada, David Suzuki Foundation



David
Suzuki
Foundation

SOLUTIONS ARE IN OUR NATURE



Janet Sumner
Executive Director, Canada Park and Wilderness Society Wildlands League



WILDLANDS LEAGUE
A chapter of the Canadian Parks and Wilderness Society

Stephen Hazell
Executive Director (interim), Nature Canada





Kristina Jackson
National Operations Director, Sierra Club Canada Foundation



Cc. Colin Carrie, Parliamentary Secretary to the Minister of Environment
Alan Latourelle, CEO, Parks Canada Agency Honourable
Honourable Lisa Raitt, Minister of Transport
Honourable Chris Alexander, MP Ajax Pickering