



To:

The Hon. George Heyman, Minister of Environment and Climate Change Strategy

cc. The Hon. John Horgan, Premier; The Hon. Doug Donaldson, Minister of Forests, Lands, Natural Resource Operations and Rural Development; and the Hon. Scott Fraser, Minister of Indigenous Relations and Reconciliation

Dear Minister Heyman,

Thank you for inviting input on provincial species at risk legislation. The undersigned environmental and animal welfare organizations have worked together closely to submit joint principles that would inform a meaningful law to safeguard the web of life as we know it in British Columbia, and give our species at risk a path to recovery.

Science-based, expedited protection for species and ecosystems was never more urgent than it is today, in light of ongoing habitat destruction and the accelerating impacts of global warming.

While much of the existing ecological damage can be attributed to the failure of previous governments to take steps to protect our threatened biodiversity, it is now your government's responsibility to expedite new conservation steps before the loss of our biodiversity becomes unmanageable.

BC's new species at risk legislation must protect and recover at-risk species and rare plant communities first by protecting functional habitat and the ecological processes upon which the relevant species rely, and second by restoring habitat that has been degraded so that the necessary ecological processes can be recovered. Further details about what is needed in BC's new law are set out in the attached document.

Species at risk legislation alone will not, however, be enough to protect BC's species and ecosystems in the long-term. Such a law must be part of a strengthened conservation framework, including:

- an expanded network of protected areas;
- new legislation to protect all native ecosystem types, including old-growth forests, based on the latest conservation biology science and traditional ecological knowledge; and,

- a commitment and significant funding to modernize land use plans, including effective policies to safeguard natural carbon sinks such as carbon-rich forests.

Without these policies and political initiatives, the number of BC's species at risk will continue to increase, eroding the natural systems that support the province's economy, communities, and cultures.

We therefore urge the provincial government to pursue the following priorities, in addition to endangered species legislation:

- Expand protected areas in a representative manner, covering all types of ecosystems, to contribute in the short-term to the internationally-agreed goal of 17% terrestrial protection by 2020;
- Develop a plan, including a timeline, to make conservation a priority across half of BC's terrestrial and marine ecosystems and their biodiversity (for more information please review Jim Pojar's milestone report "A new climate for conservation", released in 2012 by some of the undersigned¹);
- Introduce legislation to ensure science-based conservation levels of all types of BC ecosystems, such as endangered old-growth rainforest ecosystems, in particular an expedited process to introduce an old-growth protection act (see also recommendations shared by Ancient Forest Alliance, Sierra Club BC and Wilderness Committee in July and August 2017). We agree with Minister Donaldson that important steps to protect at-risk ecosystems should be taken in the context of the mandate commitment to establish endangered species legislation². The attached principles include recommendations to include strengthened protection for rare plant communities and old-growth ecosystems. We believe, however, that additional work is needed to develop a science-based approach to systematically protect old-growth forest ecosystems that have been driven to high ecological risk as a result of logging, using similar steps as those used in the Great Bear Rainforest Agreements.³
- Secure appropriate funding to modernize land-use plans across the province, in addition to the \$16 million made available for three years, in the 2018 budget. Currently in BC there are outdated land-use plans without science-based conservation levels, a growing number of species and ecosystems at risk, and landscapes that are increasingly threatened by climate change and its severe impacts. Therefore, a massive increase in funding is required in order to modernize the land-use plans across most parts of the province, safeguard ecosystems and their life-giving services and protect the species and communities that rely on healthy ecosystems. The Great Bear Rainforest Agreements, covering a region that is less than 7 percent of the province, required \$120 million in conservation financing to enable broad support for land use decisions and conservation solutions for the 21st century. Similar visionary solutions are needed for all parts of the province.

A species at risk law must function to protect and recover at-risk species and rare plant communities. However, without proper conservation plans for all types of ecosystems and old growth forests in BC, species populations and plant communities will continue to decline and the queue for assessment, listing and recovery will grow. Proactive steps must be taken to prevent species and rare plant communities from becoming at risk in the first place. This would be achieved by implementing the priorities described above, in combination with genuinely-protective endangered species legislation. These approaches would form the bedrock of a durable and sustainable economy in BC that

respects both the limits of the natural world and our obligations to protect other species. They would also ensure the functioning and long-term health of the province's ecosystems and their life-giving services.

We sincerely hope you will continue to work towards meaningful legislation with a strong legal backbone that will effectively protect and recover at risk species and rare plant communities. The new endangered species law should follow the principles set out in the attached document in order to overcome the challenge of recovering species at risk in the time of the sixth mass extinction. We look forward to hearing from you about next steps.

¹ <https://davidsuzuki.org/science-learning-centre-article/new-climate-conservation-nature-carbon-climate-change-british-columbia/>

² Minister Donaldson wrote to AFA, Wilderness Committee, Sierra Club BC and Canopy in May, that the province "will consider improving legislation to protect at-risk ecosystems in the context of our mandate commitment to establish endangered species legislation."

³ This would be consistent with the following 2017 NDP commitment: "In partnership with First Nations and communities, we will modernize land-use planning to effectively and sustainably manage BC's ecosystems, rivers, lakes, watersheds, forests and old growth, while accounting for cumulative effects. We will take an evidence-based scientific approach and use the ecosystem-based management of the Great Bear Rainforest as a model."

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