

January 29, 2024

To: biodiversity.ecosystemhealth@gov.bc.ca

On behalf of BC Nature, please accept these comments (made with careful consideration and the input of many) on the Draft B.C. Biodiversity and Ecosystem Health Framework. Thank you for your work on this!

DRAFT B.C. BIODIVERSITY AND ECOSYSTEM HEALTH FRAMEWORK

BC Nature, the organization representing almost 60 naturalist organizations throughout BC and some 6000 members, appreciates the opportunity to provide feedback on this groundbreaking framework. We look forward to engaging wherever we can to bring the goals of this framework to fruition. Our feedback follows.

The Message from the Minister

What we support:

- Healthy ecosystems and biodiversity are not only essential for our individual health and wellbeing, but they also ensure that economies and communities throughout B.C. can flourish. Healthy ecosystems and biodiversity are vital for climate change resiliency and reducing the impacts and costs related to floods, droughts and wildfires brought on by changing climate and extreme weather events.
- Canada has committed to halt and reverse biodiversity loss and formally recognizes that every Canadian has a right to a healthy environment. A collaborative stewardship approach that prioritizes the conservation and management of biodiversity and ecosystem health is needed in B.C.
- The provincial government's commitment to prioritize the conservation and management of ecosystem health and biodiversity, including the conservation and recovery of species at risk, will align all existing related initiatives and set the path for co-development and implementation of new policies, legislation, and strategies.

Where we have concern:

- The message is anthropocentric and fails to reflect the paradigm shift towards an ecocentric approach that recognizes the inherent worth of ecosystems and all the life that they encompass.

The Foreword

What we agree with:

- The province's biodiversity and ecosystems are under threat.
- The climate change and biodiversity crises are inextricably linked.
- The province would greatly benefit from a common vision related to biodiversity and ecosystem health that we can all work towards.
- The Framework promotes an inclusive, partnership-based approach.

Where we have suggestions for adding a few words (in italics):

- Paragraph 2: The climate change and biodiversity crises are inextricably linked—climate change is threatening biodiversity in B.C. Conserving, restoring, and *planning for changing* ecosystems is fundamental to mitigating and adapting to climate change. Our long-term economic prosperity depends on resilient biodiversity and ecological integrity.
- Paragraph 5: Through networks, governance structures, partnerships, planning tables, forums, agreements and co-operation and various means of collaboration we can continue work together in concert, strengthening the relationships we have with one another and with the land, water, *air*, and all living things.

Statement of Intent

What we support:

- The statement of intent
- The link to UNDRIP and the *Declaration on the Rights of Indigenous Peoples Act*
- The three pillars

Where we have suggestions:

- We suggest rewording the statement of intent as follows:
The British Columbia Government commits to conserve ecosystems and manage them to optimize their health and preserve their biodiversity. The British Columbia Government will formalize this as an overarching priority through legislation and other enabling tools that apply to, and can be accessed by, all sectors.
- While the intention paragraph lists a number of economic and service sectors where legislation may be applied, we would like to see a stronger intent, stating that the framework is indeed overarching and applies to all citizens, because we and future generations all benefit from biodiversity.

1. Ecosystem Health and Biodiversity in B.C

What we support:

- Formal recognition that every Canadian has a right to a healthy environment.
- Biodiversity and cultural diversity are inextricably linked.

We suggest rewording as follows:

Bordered by the arctic-alpine tundra on the north, the fringes of the prairies on the northeast, the Rocky Mountains along the southeastern boundary, the arid valleys on the south, and the rich waters of the Pacific Ocean on the west, BC is home to the greatest biodiversity of any province or territory in Canada. The diverse climate and topography in B.C. contribute to complex and varied ecosystems, including mountains, plateaus, valleys, coastal plains, forests, grasslands, semi-desert areas, wetlands, alpine, oceans and freshwaters.

The health of an ecosystem can be evaluated by the degree to which it maintains biodiversity and other ecosystem benefits. Healthy ecosystems have the biotic and abiotic structures, functions, compositions, and processes that maintain and support biodiversity. This includes energy flow, nutrient cycling, natural disturbance processes, hydrologic cycles, and complex interactions within and between systems, both terrestrial and aquatic, above and below the surface, forested and non-forested, from global to regional to community to individual scales, and with humans and our surroundings.

Healthy ecosystems are dynamic and resilient. Ecosystems are adapted to natural disturbances at scales that vary based on attributes such as climate, species composition, topography, water and soils. Healthy ecosystems also have a high degree of ecological integrity; they contain native species and communities, natural landscapes, and ecological functions characteristic of their region. Healthy ecosystems and biodiversity provide a range of environmental, social,

cultural and health benefits to British Columbians that are the foundation of our wellbeing. These benefits include providing services such as clean air and water, spaces for social activities and spiritual practices, provision of medicine, environments supporting social and psychological wellness, water security, flood and disease prevention, and food and nutritional security (particularly for Indigenous traditional ways of life). Healthy ecosystems and biodiversity underpin B.C.'s economy and are critical for key economic sectors, including tourism and recreation, forestry, agriculture and fisheries, and medical and pharmaceutical industry innovation. They provide solutions for climate mitigation and adaptation and set a stage for many types of social and environmental research.

Biodiversity and cultural diversity are inextricably linked. Evidence shows that Indigenous Peoples are associated with remaining high concentrations of biodiversity, demonstrating the critical role that they play in conserving the ecosystems in which they live. Their relationships to the land emerge from their values, beliefs, worldviews, livelihoods, knowledge, and wisdom. In B.C., the more than 200 distinct First Nations, each with its own unique traditions and history, and each closely tied to and shaped by its relationship to its lands, demonstrate an inherent stewardship responsibility for those lands.

Where we have suggestions, to the definitions of key terms:

Ecosystem Health: *Ecosystems become unhealthy when degraded by human/industrial use as well as non-human interventions such as fires, floods and pest infestations.*

Biodiversity (short for biological diversity): Biodiversity is the diversity of plants, animals, and other organisms in all their forms and levels of organization, and includes the diversity of genes, species and ecosystems. Comment: omit "as well as the evolutionary and functional processes that link them" because *biodiversity is not a process.*

Ecological Integrity: *Ecological integrity is a characteristic of healthy ecosystems: those that have complete food webs, a full complement of native organisms that can maintain their populations, and functioning ecosystem processes such as nutrient, water, and natural fire cycles that ensure the survival of their species. (modified from Google search)*

Conservation: *Conservation involves the protection, care, management, restoration and maintenance of ecosystems, habitats, wildlife species and populations, within or outside of their natural environments, to safeguard the natural conditions for their long-term existence. Comment: omit the word "permanence" because nothing in nature is permanent, and permanence is by definition long-term.*

Adaptive Management: adapted from Wikipedia: ***Adaptive management is a structured, iterative process of robust decision-making in the face of uncertainty, with an aim to reducing uncertainty over time by monitoring the system. In this way, decision making simultaneously meets one or more resource management objectives and accrues information needed to improve future management. Adaptive management is a tool that should be used not only to change a system, but also to learn about the system. Because adaptive management is based on a learning process, it improves long-run management outcomes. The challenge in using the adaptive management approach lies in finding the correct balance between gaining knowledge to improve management in the future and achieving the best short-term outcome based on current knowledge.***

2. Purpose

What we support:

- The entire purpose statement, enthusiastically.

We request clarification of this sentence in paragraph 4: Ecosystem-based management (EBM) will be an important management approach to achieve this which looks to concurrently manage for ecological integrity and human well-being.

Where we have a major suggestion, under Creating Conditions for Change:

- Do not assume that your audience, including our elected officials, understands basic ecology as you do.
- Creating the change requires recruiting the stakeholders and the public to embrace this vision and paradigm shift.
- Set aside adequate funding to contract biology educators to provide training sessions to elected officials, government staff, industry leaders, and other stakeholders without basic ecological knowledge, to the level of ecological understanding of high school biology.

Where we have suggestions, to underlie our support, under Desired Outcomes:

- Effective stewardship: *approach is broadly understood (see above), supported by, and meaningfully involves the broader public through respectful relationships, holistic learning, and knowledge sharing.* Comment: *We also require a means to move forward in a reasonable time span. Sometimes “a reasonable time span” means immediately! Effective stewardship includes saving endangered species and communities, such as iconic ancient forests, which cannot await delays. The development of a Species at Risk Act for British Columbia should be a priority for effective stewardship.*
- Resilient communities and economies: *achieve social and economic benefits for all in the long term, as transitions may be difficult.*

3. Principles to Guide Our Shared Path Forward

What we support:

- All of the points in the table.

Where we have suggestions:

- *We are all responsible for managing and caring for the land, air and water together.*
- *Success relies on respectful relationships with each other and the land, air and water.*

4. Foundation

What we support:

- All.

Where we have a suggestion:

- *Indigenous worldviews, cultural and economic practices have demonstrated success in maintaining ecosystem health and biodiversity.*

5. Actions

We support **Pillar 1**, with these comments and rewording suggestions:

- It also requires money and time to educate decision makers and bureaucrats.
- Ensure that the Office of Biodiversity and Ecosystem Health wields strong authority to adjudicate issues and enforce rules.
- *Integrate and align decision-making processes, policies, programs, with the priority of conserving and managing ecosystem health and biodiversity and ensure adequate input from stakeholders.*

- *ecosystems are managed in a way that minimizes risks to biodiversity-and ensures ecological integrity.*

We support **Pillar 2**, with these suggestions:

- Include BC Nature along with its 6000 members from all around the province!
- 1. Specify how we determine ecosystem health.
- 4. Remove barriers to groups that may require assistance to follow these pathways.

We support **Pillar 3**.

6. Conclusion and Next Steps

We suggest rewording the first sentence.

The Biodiversity and Ecosystem Health Framework sets out an important provincial commitment: *a commitment to conserve ecosystems and manage them to optimize their health and preserve their biodiversity. The British Columbia Government will formalize this as an overarching priority through legislation and other enabling tools that apply to, and can be accessed by, all sectors.*

Appendix A: Background Information

We suggest reducing the amount of redundancy, including Under Designing for Economic Resilience, where we request a clarifying rewrite. Under Implementation, please include mention of the 30 x 30 goal.

In addition, BC Nature suggests that we:

- Emphasize ecological education for all those involved: politicians, bureaucrats, stakeholders, and the public, so that we understand and share a common vision.
- Enlist the latest technologies to ensure that we deploy the most appropriate tools to achieve our goals.
- Recognize and act immediately on critical cases of endangerment:
 - Move quickly to protect those ecosystems most at risk.
 - Draft and pass a B.C. Species at Risk Act.
- Chart a clear path for effective communication between ministries and levels of government.
- Entrench the Office of Biodiversity and Ecosystem Health so that it is not subject to political whim.
- Expedite conversations, especially with Indigenous groups, which lead to swift enactment of laws.
- Clarify parameters for the establishment of IPCAs so that they become part of this framework. Those IPCAs that protect rare and endangered ecosystems and species should receive priority.

In our letter to Nathan Cullen and Daphne Dolhaine on May 27, 2023, *Response to the Biodiversity and Ecosystem Health Framework*, BC Nature made these requests:

1. Commit to provide greater support for stewardship of existing protected areas. Currently, many protected areas and ecological reserves depend completely on volunteer effort to maintain and restore areas that are ecologically degrading. It is essential to continue care for areas once they are designated as protected areas: just because they are safeguarded from development does not mean they do not need upkeep and stewarding.

2. Following BC's commitment to 30 x 30, we need a Provincial Protected areas strategy that states the importance of legislated protected areas for ecological health, and prioritizes working with First Nations and supporting the creation of more IPCAs.
3. The provincial protected areas strategy must outline targets for specific ecosystem types across BC, particularly those that are currently underrepresented, so that our full diversity is protected and ensure that not only low productivity sites are included.
4. Appointment of a 'Chief Ecologist' and science team to provide final say on which areas are entered into the federal database of protected areas (CPCAD). Currently, BC is one of only two provinces *without* a provincial contact/team to review protected areas being put forward (along with Quebec). This is an essential step to safeguard against poor quality sites being included into the 30x30 goal and database. Additionally, this chief ecologist should provide a framework that prioritizes the most at-risk and biodiverse ecosystems when reviewing protected areas.
5. Ensure the permanency of protected areas in BC. Permanency of high-quality sites in densely populated areas depends on the buy-in of municipalities, thus greater support and incentives is needed for municipalities to protect land they own.
6. Conservation financing for Indigenous communities that allow the creation of sustainable economic alternatives to extractive industry such as old growth logging. Many First Nations communities rely on extractive activities to support them, preventing a free choice of conservation. We realize the BC government has committed to a conservation financing fund, but it needs to be clarified whether this will create viable, more sustainable economic options for Indigenous communities.

We cannot emphasize strongly enough that the proposed paradigm shift is monumental and requires extensive education to engage all of us. The policies, laws and rules that follow will not only regulate industry and preserve biodiversity and ecosystem health. The new paradigm represents a moral shift from self-interest to concern for the common good of our people and our land for generations to come. The enactment of this framework creates an opportunity for British Columbia to stand as a world leader for the preservation of a healthy planet.

Respectively submitted,



Nancy J. Flood, Ph.D. (she/her)
President, BC Nature

Cc: Nathan Cullen WLRS.minister@gov.bc.ca
David Eby premier@gov.bc.ca