



July 14, 2023

Environment and Climate Change Canada

To National Biodiversity Policy Branch,

I am submitting these comments on behalf of the Réseau Canadian Environmental Network (RCEN) Biodiversity Caucus. Our comments are submitted without prejudice. **At this juncture, we are requesting that RCEN be included in the ongoing consultation as we move towards our first draft of the 2023/24 – 2030 Biodiversity Strategy for Canada.** We are also looking to determine how to best enable the collaborative work with the Domestic Policy Branch, to support the mainstreaming of both the Convention on Biological Diversity, as well as the National Biodiversity Strategy. We will reach out on these matters if we do not hear from you within a reasonable timeframe. We have included, at the end of our submission, a brief overview of the RCEN Biodiversity Caucus.

It is our understanding that we have been requested to inform on what should be included in our approach for Canada's National Biodiversity Strategy and Action Plan (NBSAP). We are doing this by considering the discussion paper published by ECCC and identifying gaps and guidance questions to submit, what we view, as support in achieving a framework for a robust and actionable NBSAP. Our response is presented in two sections: the first responds directly to the questions asked in the survey, while the second portion offers some overarching comments for how and what to consider as you develop our NBSAP.

This submission is in response to the request for comments from Environment and Climate Change Canada '*Engaging Canadians on the 2030 Biodiversity Strategy for Canada*'. These comments are a result of two conversations held by RCEN's Biodiversity Caucus on June 1, 2023 and June 27, 2023; during which, the Caucus engaged members of the public and NGO representatives. These comments reflect the approximately 50 collective participants across the two events, as well as Caucus Steering Committee input. The statements are not attributed to any one individual or group, nor does anything in this document indicate RCEN's position.

Direct Response to Survey Questions:

As you read this discussion paper, please consider the following overarching questions. These questions have been designed to help gather input needed to shape the development of an ambitious and inclusive strategy.

What are the key features of a successful 2030 Biodiversity Strategy?

- As many of the CBD goals successfully met as possible.
- A high percentage (at or over 30% of the land mass of Canada) and number of unique systems are saved across Canada's high-level eco-zones (CBD Target 2).

- At least 30% of the above must be degraded ecosystems with the capability of holding a variety and density of flora and fauna (CBD Target 3).
- Ecosystems conserved must have a high impact on lowering numbers of Canadian Species at Risk (both flora and fauna).
- Effectively and successfully dealing with ecosystems, biodiversity, and species in the face of climate change. It is expected to imperil the function of current Canadian ecosystems' success in providing a thriving habitat for its resident flora and fauna. We should be starting the process of identifying suitable lands for replacement island ecosystems further north and plan their development for the time when larger species move their habitat and will migrate to them. An adequate sample of small animals and flora will have to be transported to these developed current ecosystem islands to flourish in the modified climate. Over the decades, several of these island ecosystems may be developed as climate change moves north. The methods used for the implementation of the island ecosystems may be similar to those employed for degraded ecosystems.
- To maintain the number of unique fauna and flora in Canada, and as a last prevention of extinction, a small sample of flora and fauna may be kept in captivity (as some are today – for example, Prairie Buffalo). Also, Canada should keep samples of seed for endangered flora and DNA for endangered fauna – an extension of the concept of the Norwegian Seed Bank.

What are the most significant challenges and opportunities to achieving the Kunming-Montreal Global Biodiversity Framework targets in Canada?

Challenges

- The necessity, especially for all provinces, to agree on the immediate need for a comprehensive Biodiversity Program to fulfill Canada's international commitment to implement the Convention on Biodiversity.
- The need for Federal and Provincial/Territorial methods to accomplish CBD and support action (vs. inaction) in the face of other priorities.
- The requirement of cooperation within and between Federal Government departments.
- The reality of competing priorities for political action.
- Climate change.

Opportunities

- Public support through enhanced education and publicity (similar to what is being done with climate change) to teach Canadians about their dependence on nature (eco-services, water, air, etc.), modify downward the consumption of eco-services, and enlist support for conserving and protecting Nature.

What successful initiatives could we build upon?

- Hopefully, an international or national study was discovered from 2010-20 implementation and was drawn on to evaluate what worked and what didn't. If not, this is an immediate priority for

convening an international meeting of countries involved in COPs 2010-2020 to determine strengths and weaknesses in the 2020-10 implementation.

- The climate change campaign and its methods should be conducted to change (unfortunately, slowly) to biodiversity and its ecosystems. Like climate change, biodiversity loss is a problem that won't magically disappear. This is increasingly backed by experiences such as the severe weather and forest fires this summer (which, parenthetically, is destroying ecosystems that won't be replaced for years). As an example, the latter fact should be highlighted in news releases by the Department as an additional factor of climate change.

Are there targets where Canada is already making good progress and others where Canada should focus more attention?

- Canada, as with the world, is on a nature-positive path now with the CBD implementation effort as compared to the lack of success in the implementation of the 2020 targets. The creation of protected areas can be seen as an initiative that is progressing at a better pace but the specific location and increasing pressures for development remain even within protected areas.
- Success on most targets depends on an [ecosystem approach](#), a strategy defined by CBD as a strategy for the integrated management of land, water, and living resources that promotes conservation and sustainable use in an equitable way.
- There is a great need for metrics and data to evaluate ecosystems, project progress indicators, post-2030 evaluation, and ongoing monitoring after 2030.
 - If these exist, they are not highlighted in the material surrounding implementation.

What measures should be prioritized and implemented as soon as possible to ensure we meet the 2030 targets and are on track to reach the longer-term 2050 goals?

- Integration of the Canadian Species at Risk Act expectations with the CBD planning for implementation and the selection of the habitats/ecosystems in the running for potential protection.
 - Considerations and criteria given for potential selection will follow this question-and-answer section.
- Need for defining and implementing suitable metrics/data for the successful completion of the implementation, evaluating the results according to CBD expectations and the selection consideration/criteria, and ongoing monitoring.
 - This point will also be expanded upon in the second part of the submission.

No target is an island: What overarching tools and solutions are critical for making progress across multiple targets?

- In the strategic planning stage, solutions should carefully consider how multiple targets can be met simultaneously. This is an important aspect of overall success. For example, by considering areas for protection and rehabilitation given the variety and density of each species in the ecosystem/habitat.

What additional knowledge and enabling mechanisms (e.g., networks, policies) are critical to inform implementation decision-making at all levels?

- Portal of this as a national as opposed to a federal project.
- Ensure that bringing the provinces and territories “on board” is a priority.
- As Federal input to the Sustainability Program (of which biodiversity is an aspect), “parcel” parts of the responsibility to the departments/agencies best equipped to deal with them while coordination and management is the responsibility of ECCC.
- Consider the importance of ENGOs as allies in the success of this program.
- Broad public support is necessary – implications, like climate change, include information provision on both aims and process, training and public involvement.

In drafting the 2030 Biodiversity Strategy, what individuals’, communities’, or organizations’ perspectives, knowledge, and skills should be meaningfully amplified to make progress on reducing threats to biodiversity?

- Advisory committees would be an ideal way to accomplish this. It has already been announced that there will be consultation on this issue, and hopefully, ongoing updates on status and problems that arise in the implementation by indigenous groups, provinces and territories, industry, and civil society will be provided. We would advise, in the latter case, a review and advisory committee by major ENGOs and the scientific community with knowledge and expertise in these areas. Specific discussions with municipal governments should be also instituted in cases where protected areas will have a major effect on their community.

What are the key human needs and values to be addressed to make biodiversity loss a mainstream concern?

- Nature is necessary for human existence (witness, eco-services, and human pleasure in interacting with a natural environment).
- Humans are part of Nature – it is not Humans versus Nature. It is their interest now and far into the future.

What does success look like?

- Short-term
 - Meeting all the goals and targets of the 2023-30 CBD fully.
- Long-term
 - Biodiversity and Nature exist within protected areas as they did in pre-industrial times.
 - Be proactive as a national government to seek ways to reduce, more generally, the drivers of biodiversity and ecosystem loss. It is not only a matter of short-term economics as may have political saliency, but also a matter of long-term human interaction in the world humans live in and our children grow in.

Overarching Comments and Recommendations:

Aligning Canada's NBSAP, Kunming-Montreal Global Biodiversity Framework, and the Convention on Biological Diversity

1. Set Canada's goals to 2050 and align targets and indicators with the Kunming-Montreal Global Biodiversity Framework (KM GBF) as much as possible to allow for collective directions and ease of reporting. Use the advice from the CBD at <https://www.cbd.int/gbf/>. The information created and available through the secretariat is relevant in our Canadian context. The guiding questions will help hone our work. We are also noting that, if there was a stronger negotiating position from the International Policy Branch of Canadian Wildlife Services, on 2030 targets in the KM GBF, we encourage you to take this as the baseline for your work.
2. Urban focus and engagement, as well as all three objectives of the CBD and implementation, must be considered as we move towards a draft NBSAP.

Implementation and Monitoring Methodology

3. The NBSAP put forward for 2030 must be more than a generalized strategy. We need specific goals and evidence in the 2023/24 – 2030 NBSAP that chart a clear path forward if we are to reverse biodiversity loss. We recognize that this is a large problem and accelerating crisis, therefore the strategy should contain sub-pathways and benchmarks to break it down into smaller steps instead of just general outcomes that we will accomplish. Both the development and implementation of our NBSAP should also embody an adaptive management approach which will help us ensure our path is progressing as planned and we can apply needed corrections as they occur.
4. In the methodology and framework used to develop NBSAP, please consider high-level indicators that support multiple targets.
5. Ensure that all targets are timebound to 2030 and have quantitative measurements where possible.
6. Include audit mechanisms as well as conversations with Statistics Canada in both target and indicator identification. When carrying out this audit and evaluation, include opportunities for all actors and participants to contribute (i.e. citizen science – consider reconstituting the Ecological Monitoring and Assessment Network of ECCC).
7. Consider now, as we develop the NBSAP framework, optimal mechanisms for implementation.
8. Consider roles and responsibilities for other Ministries and Agencies.
9. Synergies & Co-Benefits – Collateral Effects: This should be a cross-department Federal Government exercise, similar to that which occurs with our Sustainable Development Strategy. The potential for addressing climate change through biodiversity-positive actions, and underscoring and strengthening

Sustainable Development and the 2030 Sustainable Development Goals into the consideration of Canada's NBSAP is a natural fit. This also works with a multitude of Multilateral and Binational Environmental Agreements Canada is a signatory to. Having conversations with internal focal points for these conventions can help us meet our international agreements. Considering and embracing information and support from other international bodies, such as the Intergovernmental Panel on Biodiversity and Ecosystem Services, is also a good way to mainstream both our NBSAP and the body or agency.

10. We support that a key pillar in engaging Canadians and making progress on the KM GBF will be by supporting local government through resources directed to their efforts. We also recognize that some sub-national governments are not necessarily supportive of finding ways to support and stop the loss of biodiversity. Perhaps we can explore under what circumstances, and create a path, for cities to become charter cities so that they are no longer solely creatures of the province.
11. We support the guiding principles, committing to urgent and ambitious action, seeking transformative change, taking a comprehensive whole-of-society approach, taking an all-of-government approach, walking the path to reconciliation, and making space for multiple ways of knowing. However, we also believe guiding principles should include:
 - All governments: First Nations/Indigenous/Métis/Inuit, Local, Provincial/Territorial
 - Clarity on this as an all-of-citizen and society framework as we have to find ways to meet people where they are and based on their interests in this process.
12. Identify gaps in the policies and instruments needed to enhance the NBSAP as a parallel path while in development – perhaps this is part of the development of the Biodiversity Act that Minister Guilbeault has recognized the need for. Also, strengthen other acts and legislation that currently directly or indirectly, impact genes, species, and ecosystems, such as the Species at Risk Act so that it is effective in achieving the desired outcomes.

Stakeholder Engagement

13. Have true, meaningful engagement through ongoing face-to-face and virtual engagement with RCEN and other CSO representatives.
14. Develop and expand on communications, education, and public awareness initiatives. RCEN is well positioned and would be very willing to help fulfill this direction.
15. Ensure multiple voices are brought to the table for both development and implementation. Find paths to engage with all voices, sector groups, individuals, and other stakeholders. What do we need to do to make sure everyone who wants to participate can? Consider adopting a Major Group approach similar to that used across the United Nations system. Strive to include all levels of government and Indigenous hereditary leadership, faith-based voices, educators, funders, media, influencers, and also people who rarely participate. We want a process where everyone has a pathway to contribute to the outcomes if they choose to. RCEN is also well equipped to assist in this area.

Non-Human Rights

16. We are calling upon the Federal government to include in our NBSAP approach a path for exploring the rights of Nature/Mother Earth, animal rights, and Indigenous natural law so as to start a shift towards eco-democracy.

We absolutely must ensure that 1) we have a clear approach with steps articulated to address biodiversity loss that can identify and deconstruct the drivers of this issue; 2) we set timebound and quantitative targets; 3) we consider cumulative impacts; 4) we have an action- and implementation-based approach in our minds as we set out our NBSAP; 5) we have fulsome engagement and ongoing dialogue between ECCC and various stakeholders on environmental issues; 6) NBSAP becomes part of our Biodiversity Act so that there is both Act (law) and Regulation (with teeth) included in this as we move towards living in harmony with nature and natural law; 7) we support local governments with training and implementation as much as possible.

We sincerely thank you for the opportunity to contribute and look forward to working with you on the NBSAP and other matters. If you need clarity or have questions about this contribution, please do not hesitate to reach out.

Sincerely,

Leslie Adams

Chair Biodiversity Caucus

Sierra Club Canada Foundation

biodiv-sdgs@sierraclub.ca

Kass Harris

RCEN Network Coordinator

Réseau Canadian Environmental Network

outreach@rcen.ca

RCEN Biodiversity Caucus

The Biodiversity Caucus was established in 2009 and strives to connect players from the local to the global level with the goal to mainstream and implement the Convention on Biological Diversity (CBD). We strive to do this by raising awareness and urgency, building capacity, and domesticizing the international agenda in Canada. The Caucus seeks to improve society's understanding of the multiple values of Biodiversity, to help us all address the multiple drivers of biodiversity loss, and to develop and enable proactive ways of taking action to meet the challenges.

The Caucus works from the definition of biological diversity in the CBD, with an understanding that Biodiversity includes genetic diversity, species diversity - including humans - and ecosystem diversity. In doing so, the Caucus explicitly recognizes the importance of respecting and considering different belief systems and political views.