

**From:** David Quigg <[DavidQ@Sierraclub.bc.ca](mailto:DavidQ@Sierraclub.bc.ca)>  
**Sent:** Tuesday, February 6, 2024 8:06 PM  
**To:** Vanessa Craig <[vanessa.craig@rdn.bc.ca](mailto:vanessa.craig@rdn.bc.ca)>  
**Subject:** Fund for Biodiversity: Model Recommendation and Report

Dear Vanessa Craig,

(I would be grateful if you could send this to the RDN Board. I tried earlier but the address is set to a senders list.)

The BC government has recently announced significant funding for conservation, and it is important that Regional Districts have access to a dedicated fund to acquire land for greater climate resilience and ecosystem health.

In September EB32 Supporting Biodiversity in Local Communities passed at UBCM. Please support the request made in the resolution by advocating for the creation of a Local Natural Areas Protection Fund that Municipalities, Regional Districts and First Nations can access.

- See the attached Model Recommendation and Report, and supporting documents to help in advocating for the fund.
- The advocacy letter would be made stronger by including examples of how a dedicated fund could help the RDN protect biodiversity and ecosystem health locally.

In addition to advocating for the fund, there is language in the Model Recommendation requesting that the B.C. government create a biodiversity and ecosystems health law. This was promised in 2017. To date B.C. has no legislation that protects at risk species or ecosystems.

- Attachment 2 is the response to the resolution passed at UBCM in 2022 calling for a biodiversity and ecosystem health law.

A dedicated fund to acquire land to protect biodiversity and an overarching BEH law are essential to protecting ecosystems, species, and mitigating climate impacts. This is why advocacy for the fund and the law are included together.

Please reach out if you have any questions or would like further clarification.

Sincerely,  
David Quigg



**David Quigg**  
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**MODEL RECOMMENDATION AND REPORT:  
ADVOCACY FOR PROVINCIAL ACTION FOR BIODIVERSITY**

**Submitted by:**        *[Council Member Name]*

**Date:**                *[Date]*

**Subject:**             **Advocacy for Provincial Action for Biodiversity**

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**RECOMMENDATION:**

That Council *[the Board]* request that the Mayor *[Chair]* write to the Premier, copying the Minister of Environment and Climate Change Strategy and the Minister of Water, Land and Resource Stewardship, as well as Members of the Legislative Assembly representing constituencies in this regional district:

1. Indicating the Council's *[Board's]* appreciation for the Province moving forward with establishment of the Conservation Financing Mechanism to facilitate Indigenous-led conservation measures, and the Tripartite Framework Agreement on Nature Conservation between Canada, British Columbia, and the First Nations Leadership Council;
2. Stating the Council's *[Board's]* support for establishment of a Local Natural Areas Protection Fund and enactment of a provincial law for Biodiversity and Ecosystem Health — consistent with Resolutions EB32 and NR38 adopted at the 2022 and 2023 UBCM conventions; and
3. Requesting an update on Provincial actions to implement these resolutions in partnership with local governments.

That Council *[the Board]* receive the attached draft letter for information, to inform the Mayor's *[Chair's]* letter to the Premier, Ministers and MLAs.

And that Council direct the Corporate Secretary to forward the adopted resolution to local governments in the regional district for their favourable consideration.

**BACKGROUND:**

In September 2023, delegates at the Union of BC Municipalities (“UBCM”) annual convention voted in favour of Resolution EB32, calling on the Province to work with local governments and First Nations “to support the protection and restoration of biological diversity in local communities by establishing a Local Natural Areas Protection Fund and other legislative and promotional measures to support local efforts to acquire land for biodiversity and ecosystem health.”

This built on delegates' adoption of Resolution NR38 at the 2022 UBCM convention, which called on the Province of British Columbia to develop "new legislation to protect and restore biological diversity and ecosystem health, in a manner consistent with the United Nations Declaration on the Rights of Indigenous Peoples, and with the involvement of local governments, civil society groups, Indigenous Knowledge Holders, scientists, and members of the public."

Protecting and restoring biological diversity ("biodiversity") is consistent with Canada and BC's commitments in the recently announced Tripartite Nature Agreement, with the United Nations Convention on Biological Diversity, enacted in 1993, and with British Columbia's commitments in the *Together for Wildlife* Strategy. These actions also align with commitments in the UN Declaration on the Rights of Indigenous Peoples and BC's *Declaration on the Rights of Indigenous Peoples Act*.

Acting now to protect and restore biodiversity contributes toward more resilient and healthy local communities – improving community health while securing the health of local waterways, watersheds, airsheds, and plant and animal species. Action to protect and restore biodiversity also makes financial sense, helping to contain emergency management and infrastructure costs in the context of climate change.

In October 2023, the Province took a positive step in the direction of conservation financing, announcing the \$150-million contribution from the Province and a \$150-million contribution from the BC Parks Foundation, to fund new Indigenous-led conservation measures. In November 2023, the Tripartite Framework Agreement on Nature Conservation by the First Nations Leadership Council, the Government of British Columbia, and the Government of Canada was announced bringing the total to \$1.1 billion towards conservation. These are major positive steps.

Sub-section 12.3 of the Nature Agreement commits Canada and BC to "engage with local governments and stakeholders on opportunities for input and involvement in the implementation of the Agreement." Municipalities and regional districts are in need of funding to protect and restore natural areas to ensure greater climate resiliency in areas where many residents are at risk of the health impacts of climate change. A funding mechanism such as a Local Natural Areas Protection Fund is essential to ensuring the wellbeing of communities.

Based on the foregoing, it is recommended that Council [*the Board*] direct the Mayor [*Chair*] to write to the Premier, (1) expressing appreciation for the Province's action in establishing the Conservation Financing Mechanism and Tripartite Framework Agreement on Nature Conservation, (2) urging the Province to implement Resolutions EB32 and NR38, by establishing the Local Natural Areas Protection Fund and moving forward with enactment of an overarching provincial law to protect biodiversity and ecosystem health, and (3) requesting an update on Provincial actions to implement resolutions EB32 and NR38. A draft letter to the Premier is attached to this report, along with supporting information.

Respectfully submitted by,

*[insert signature here]*

Councillor / Mayor / Director *[last name]*

Attachments:

1. Draft Letter to the Premier regarding Local Natural Areas Protection Fund and Provincial Biodiversity Law
2. Provincial Government Response to UBCM Resolution NR38, February 2023
3. Conversation Primer on Declaration for Biodiversity and Ecosystem Health, November 2022
4. *Action for Healthy Communities* Report, 2022

**ATTACHMENT 1:**

**DRAFT LETTER TO THE PREMIER, MINISTERS AND MLAS REGARDING  
LOCAL NATURAL AREAS PROTECTION FUND AND BIODIVERSITY LAW**

Mayor *[firstname lastname]*  
*[municipality]*  
*[street address]*  
*[email]*

[month date, 2024]

Premier David Eby  
PO BOX 9041 STN PROV GOVT  
Victoria, BC V8W 9E1  
Email. premier@gov.bc.ca

SENT VIA EMAIL

Dear Premier Eby:

**Implementation of UBCM Resolutions EB32 and NR38: Establishment of  
Local Natural Areas Protection Fund and Provincial Biodiversity Law**

I am writing on behalf of my Council *[Board]* to indicate the *[City/Town/District]* of *[Municipality / Regional District]*'s strong support for the Province moving forward with UBCM Resolutions EB32 and NR38, as adopted by delegates at the 2023 and 2022 conventions, respectively.

Let me begin by expressing appreciation for the Province's leadership in establishing the Conservation Financing Mechanism and Tripartite Framework Agreement on Nature Conservation, which will provide valuable support for Indigenous-led conservation measures and advance Canada and BC's commitments to protect at least 30 per cent of BC's land by 2030.

We now write to encourage the Province to continue with this important work by establishing a Local Natural Areas Protection Fund, as endorsed by UBCM delegates, and enacting an overarching provincial law to protect biodiversity and ecosystem health.

Benefits of a Local Natural Areas Protection Fund include:

- Supporting the goal of Canada, British Columbia and local communities to protect 30% of the land base by 2030 (the "30 by 30" target, arising from Canada's commitments under the UN Convention on Biodiversity);

- Protecting biodiversity, wildlife habitat and ecosystem function, to keep our communities resilient and safe in the context of our changing climate;
- Expanding opportunities for low-impact outdoor recreation by residents and visitors, contributing toward public health and local economic development; and
- Creating a framework for partnership between the Province and local communities to protect the natural environment, leveraging local contributions and philanthropy with Provincial support.

Terms of Reference for a Local Natural Areas Protection Fund could include:

- a. Establishment of a permanent fund, to be administered by the BC Ministry of Municipal Affairs, with input from the Ministry of Environment and Climate Change Strategy and Ministry of Water, Land and Resource Stewardship;
- b. Municipalities and regional districts are eligible to apply for grants from the fund;
- c. Grants of up to \$4-million per acquisition, subject to local contributions of 20% of total acquisition costs for communities with populations of 10,000 or more, and local contributions of 10% of total acquisition costs for communities with populations below 10,000;
- d. Funds will be transferred from the Province to the local entity after a covenant has been registered on the land title securing the property in perpetuity as a natural area, with ownership vested in the municipality, regional district, First Nation or a non-profit conservation partner;
- e. Allocation of start-up funding of \$100-million in the 2024 Provincial budget; and
- f. Allocation of annual top-up funding of \$50-million from the Provincial treasury in each year's budget until 2030.

In addition to creation of the Local Natural Areas Protection Fund, we urge the Province to move forward with other actions to safeguard biodiversity, including enacting an overarching provincial law to protect biological diversity and ecosystem health. As you are aware, enactment of this legislation was recommended by the Old Growth Strategic Review (2020) and has been endorsed by resolutions of the Union of British Columbia Indian Chiefs in 2021 and UBCM in 2022.

In our opinion, the new provincial law should replace the current framework of fragmented decision-making and cumulative impacts with a coherent, overarching legislative framework that (1) prioritizes biological diversity and ecosystem health; (2) recognizes Indigenous jurisdiction and perspectives; (3) adopts a definition of ecosystem health that includes restoring ecological integrity, maintaining fully functioning ecosystems and managing for resilience, and (4) is accompanied by resources to alleviate economic impacts of ecosystem protection on Indigenous and non-Indigenous communities.

In closing, we express appreciation for the Province's leadership in establishing the Conservation Financing Mechanism, and the Tripartite Nature Agreement, and we encourage the Province to continue this important work by establishing the Local Natural Areas Protection Fund and enacting the Biodiversity and Ecosystem Health Law in a timely manner. We welcome an update on the Province's actions in this regard.

Sincerely,

[signed]

Mayor *[Chair] [firstname lastname]*  
*[municipality]*

cc. George Heyman, Minister of Environment and Climate Change Strategy  
Nathan Cullen, Minister of Water, Land and Resource Stewardship  
MLA *[names of MLAs in the regional district]*



### **NR38 New Legislation to Protect and Restore Biological Diversity and Ecosystem Health**

**Islands Trust**

Whereas a healthy environment is essential for the wellbeing of residents, local communities and local economies;

And whereas the cumulative impacts of inadequate provincial environmental regulations impose costs and risks on local communities, including risks associated with climate change, drinking water supply, wildfire hazard, flooding, and security of municipal infrastructure, and may undermine local government planning:

Therefore be it resolved that UBCM call upon the Province of British Columbia to, in partnership with Indigenous leadership, develop and communicate in a timely way the process and timelines through which they will develop new legislation to protect and restore biological diversity and ecosystem health, in a manner consistent with the United Nations Declaration on the Rights of Indigenous Peoples, and with the involvement of local governments, civil society groups, Indigenous Knowledge Holders, scientists, and members of the public.

#### **RESPONSE: Ministry of Water, Land and Resource Stewardship**

Government acknowledges the urgency to protect biodiversity, species at risk and their habitats. It's one of the reasons the Ministry of Land, Water and Resource Stewardship was established. Protecting and promoting the recovery of threatened and endangered species continues to be a priority for our government. Supporting healthy ecosystems is imperative so our environment can support healthy communities and sustainable livelihoods.

This Ministry is building on our progress to date to protect threatened species, enhance B.C.'s biodiversity, and establish consistent and effective management actions that will support ecosystem health.

We are advancing implementation of the [Together for Wildlife Strategy](#), including Goal 12, which commits to reviewing and improving the *Wildlife Act*. The first round of improvements to the *Wildlife Act* came into force on Sept 1, 2022. These were short-term reconciliation focused amendments addressing Indigenous Knowledge and the ability to enter into sheltering agreements. We also continue to work with First Nations and other partners on a variety of species and habitat management initiatives and policy projects that benefit biodiversity and species at risk management including investing \$37 million for watershed, wetland, species and ecosystem restoration last year.

Our government has also committed to implementing all 14 recommendations of the independent panel's old growth strategic review report, [A New Future for Old Forests](#). Many of the recommendations, including forestry deferrals, ecosystem health prioritization, and the development of a new framework for biodiversity targets, will benefit species and ecosystems at risk. Recommendation #2 is to "declare the conservation and management of ecosystem health and biodiversity of British Columbia's forests as an overarching priority and enact legislation that legally establishes this priority for all sectors." The report recognizes that conserving and managing ecosystem health will be a cornerstone of the Province's biodiversity conservation strategy.

The 14 recommendations identified follow-up actions. The next priority is to build a strategic action plan to guide implementation of the recommendations. From now through 2023, Government will partner with First Nations and will engage with industry, environmental organizations, labour groups and local governments in identifying the required key actions.

Alongside the development of the strategic action plan, there will be two phases that were initiated in fall 2022 to implement Recommendation #2. Phase one comprises the development of a declaration for conservation and management of ecosystem health and biodiversity in British Columbia. Phase 2 in 2023, will explore both the legislative and policy tools required to support the implementation for the declaration.

# Developing a Declaration on Ecosystem Health and Biodiversity as a Priority for All Sectors

A CONVERSATION PRIMER



WATER, LAND AND RESOURCE STEWARDSHIP  
VERSION 2.2

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# 1. PREFACE

Moving forward in a way that supports implementation of the Old Growth Strategic Review (OGSR) and recognizes and respects UNDRIP and its commitment under DRIPA, the Province intends to facilitate conversations with First Nations to support the co-development of an Old Growth Strategic Action Plan and a B.C. Declaration that prioritizes ecosystem health and biodiversity.

This conversation primer aims to build a shared understanding to support dialogue and collaboration on the approach to co-developing a B.C. Declaration that prioritizes ecosystem health and biodiversity.

This primer is written in the context of the following:

- **The Ministries of Forests (FOR) and Water, Land and Resource Stewardship (WLRS) are responsible for supporting the implementation of the recommendations of the Old Growth Strategic Review (referred to as the OGSR) in collaboration with Indigenous Leaders and in consultation with labour, industry, and environmental groups, with FOR leading the overall OGSR implementation (see OGSR process);**
- **While the focus of this primer is on Old Growth Strategic Review Recommendation #2, the Province acknowledges that the OGSR is a package and specifically that implementation of Recommendation #1 is foundational to overall OGSR implementation.**

(OG1) Indigenous Involvement: Engage the full involvement of Indigenous leaders and organizations to review this report and any subsequent policy or strategy development and implementation.

(OG2) Prioritizing Ecosystem Health and Resilience: Declare the conservation and management of ecosystem health and biodiversity of British Columbia's forests as an overarching priority and enact legislation that legally establishes this priority for all sectors.

- The Declaration on the Rights of Indigenous Peoples Act (2019, SBC, C.14);
- Section 2.6 through 2.9 of the Declaration On The Rights Of Indigenous Peoples Act Action Plan 2022-2027 and the commitment that Ministries across government will continue to work in consultation and cooperation with Indigenous Peoples across the Province to implement actions identified in the Action Plan, reflecting our mutual commitment to work together in partnership; and
- Related strategies, programs and engagement processes including Together for Wildlife, Collaborative Stewardship Framework, Environmental Stewardship Initiative, Cumulative Effects Framework, Modernized Land Use Planning, Watershed Security Strategy and Fund Discussion Paper, etc.

## 2. INTRODUCTION

The OGSR was shaped by an extensive engagement process and concluded with a set of 14 recommendations for improving forest management within a shifting paradigm towards more holistic and sustainability-focused stewardship.

In recognizing that conservation of long-term ecosystem health and biodiversity is key for protecting the health and wellbeing of communities as well as maintaining vital resources for future generations, the second recommendation of the OGSR calls on the Province to **“declare the conservation and management of ecosystem health and biodiversity of British Columbia’s forests as an overarching priority and enact legislation that legally establishes this priority for all sectors.”**

Several common themes have emerged from conversations that have taken place over the years between government and Indigenous leaders, Indigenous Peoples, stakeholders, the public, local governments, environmental non-governmental organizations, conservation groups, farmers, ranchers, and rural communities on topics related to ecosystem health and biodiversity.

First is the imperative of recognizing Indigenous peoples as long-time stewards of the environment and building a foundation for co-management that is rooted in respect for Indigenous rights and knowledge, in alignment with the B.C. Declaration on the Rights of Indigenous Peoples Act. Other main points of consensus included respect for regional diversity; more complete, trusted, and accessible data, information, and knowledge; and capacity building and support for consistent meaningful engagement and collaborative action.

These themes, among others, were incorporated to form the OGSR recommendations. However, underpinning the transformation towards a more inclusive, stable, and effective management framework is the condition that ecosystem health and biodiversity be treated as pillars of a sustainable economy (rather than constraints).

A formal B.C. Declaration prioritizing biodiversity conservation and ecosystem health would serve to facilitate the necessary shift in guiding management practices better aligning with goals of protecting species, conserving vital ecosystem resources, and ensuring the health and long-term social and economic wellbeing of communities across the Province. As such, the scope of the Declaration is not limited to forests, but extends to all ecosystem types in British Columbia including terrestrial (e.g., forest, grasslands and desert) and aquatic (e.g., rivers, streams, lakes, wetlands and estuaries) ecosystems.

### 3. APPROACH

Of the 14 recommendations in the OGSR, a B.C. Declaration and legislative framework that prioritizes ecosystem health is identified as one of the five essential “required conditions for change” that is, being foundational and a core component to facilitate a shift towards integrated and inclusive stewardship of BC’s forests and ecosystems.

Through collaboration, the Province intends to have co-developed a B.C. Declaration on ecosystem health and biodiversity that applies to all sectors and that will guide the Province to legally establishing this priority in partnership with Indigenous Peoples, stakeholders, local communities, and other partners.

The Province’s proposed approach to advancing a B.C. Declaration and legislative framework that prioritizes ecosystem health involves:



#### 3.1 PHASE ONE - DECLARATION

Co-develop with Indigenous leaders, and with input from key stakeholders, a B.C. Declaration on the Priority of Ecosystem Health and Biodiversity that applies to all sectors and sets our path forward to support implementation, aligned with other foundational recommendations (e.g., governance, three-zone management framework, better public information).

**Deliverable:** Co-developed B.C. Declaration in Spring 2023.

#### 3.2 PHASE TWO – WORKING TOWARDS IMPLEMENTATION

Explore if and how legislation can be developed or updated, along with other system changes, to achieve the vision and intent set out in the B.C. Declaration. A key goal will be to ensure that we are immediately improving the system following the release of the B.C. Declaration, including implementation guidance, changes to existing policy, improved information, and accountability, while also considering longer term changes.

As part of the consideration for legislative requirements, there may be multiple ways to give legal effect to the B.C. Declaration and these can include a combination of the following:

- Use of existing legislative tools, including the exercise of regulatory powers to develop new regulations;
- Potential legislative changes and additions to existing legislation; and
- Development of new legislation.

**Deliverable:** Implementation of enabling tools, possibly including updates to existing legislation and developing new legislation, policies and guidance, to successfully implement the B.C. Declaration across all sectors.

## 4. BACKGROUND

### 4.1 PRIORITIZING ECOSYSTEM HEALTH AND BIODIVERSITY

British Columbia is home to the greatest biodiversity of any province or territory in Canada.

**Biodiversity** (or 'biological diversity' referring to ecosystems, species, and genetic diversity, and the processes that shape them), is an integral part of the B.C. identity and fundamental for supporting a multitude of economic sectors including forestry, tourism and recreation, hunting and trapping, biological and medical research, and many others. Biodiversity is also a pillar of food and livelihood security within and beyond the province as well as an essential component of ecosystem resilience.

In recent decades, the need to protect biodiversity has become more urgent in response to increasing threats to ecosystems (primarily from human activities), but also as a way of helping to increase our adaptive capacity to global environmental change. The mounting effects of climate change (including catastrophic wildfires, flooding, and mountain pine beetle outbreaks) have compounded the impacts of human-induced habitat fragmentation and loss, threatening the productive capacity and resilience of many ecosystem types. Recognizing these challenges, along with the health, safety, and livelihood risks that they bring to human populations, communities across British Columbia are now advocating for a higher standard of ecosystem stewardship and biodiversity conservation.

A new integrated and inclusive stewardship paradigm that prioritizes biodiversity and ecosystem health is needed to address the emerging environmental challenges as well as achieve true and lasting reconciliation with Indigenous Peoples. Focusing on **ecosystem health** as a broad-based goal will serve to guide future development to minimize biodiversity risk and ensure ecosystem health and well-being outcomes for species, habitats, and human communities. As a holistic and dynamic concept, ecosystem health further implies a collaborative and adaptive approach to management, where health is not limited to current conditions, but is essential for long-term resilience and maintaining resources for future generations.

## 4.2 CONNECTION WITH OTHER GOVERNMENT INITIATIVES

There are many government initiatives and mandates that point towards moving to a land management system that focuses on maintaining ecosystem health, including:

- measures for species at risk and conserving and enhancing B.C.'s biodiversity;
- developing a co-managed land and resource management regime with Indigenous peoples; and
- continuing to advance Modernized Land Use Planning (for ecosystems, rivers, lakes, forests, lands, and waters), Together for Wildlife Strategy, Watershed Security Strategy, Coastal Marine Strategy, Marine Salmon Strategy and Cumulative Effects Framework.

Implementing a B.C. Declaration that prioritizes ecosystem health offers an opportunity to support a coordinated and cohesive approach to align and strengthen these existing initiatives, as well as support advancing key government priorities.

## 4.3 WHAT IS A DECLARATION

A declaration is a statement or announcement which can convey a vision, set priorities, outline pathways for future engagement or action, or all these things. It can be a powerful catalyst for a shift in thinking and create a vision and the conditions for change.

Declarations can range from being purely aspirational to more directive in nature, with commitments and actions. It may only apply to the organization issuing the declaration or could have broad application inviting other governments, leaders, and organizations to endorse it.

OGSR implementation advice suggests a B.C. Declaration may provide an overarching vision along with specific principles that will guide the overall shift to this new framework (similar to the DRIPA construct).

### EXAMPLES OF DECLARATIONS:

- [Assembly of First Nations \(AFN\) National Water Declaration](#): in recognition of the United Nations World Water Day, the AFN joined other Indigenous peoples around the world calling for attention and action to water issues facing Indigenous peoples.
- [United Nations Declaration on the Rights of Indigenous Peoples](#): followed by release of the [Draft 10 principles that Guides the Province of B.C.'s Relationship with Indigenous people](#), and given legal effect by the [Declaration on the Rights of Indigenous Peoples Act](#).
- [Leaders' Pledge for Nature – United to Reverse Biodiversity Loss by 2030 for Sustainable Development](#): is a declaration of commitments by political leaders participating the UN Summit on Biodiversity. It invites others to participate in and endorse the pledge, including local governments and businesses.



## 4.4 THE ROLE OF SIGNATORIES IN A DECLARATION

Signatories of a declaration consist of the party(ies) who are “committing” to the content and intent of the Declaration. While the OGSR advises the Province to make this declaration, there is a potential opportunity to broaden the scope recognizing that everyone (provincial government, Indigenous governments, local governments, businesses, communities, and individuals) has a role to play.

Some options for signatories may include the following:

- The Province alone (e.g., Draft 10 Principles that Guide the Province’s Relationships with Indigenous Peoples);
- The Province and Indigenous Leaders;
- The Province with other leaders choosing to endorse or “sign-on” to the declaration and these leaders may include other levels of government, business associations, etc (e.g., the Leaders Pledge for Nature).

## 5. CREATING THE DECLARATION

Elements of a declaration may include one or more of the following: a vision statement, principles, goal and targets, commitments, and actions to be agreed by the signatories. Recognizing that there are many ways to draft a declaration, to help prompt discussions, this section offers examples of how each element might be considered or included in a declaration on ecosystem health and biodiversity. The ideas and examples provided are based on:

- The OGSR report, including implementation advice for the declaration, and what we heard report
- Examples from existing declarations related to ecosystem health and biodiversity (i.e., see Module 3 on What is a Declaration)
- Themes from recent previous government engagements (i.e., see Module 4 for a summary of themes heard)

### 5.1 VISION AND PURPOSE

OGSR advised the Province to make a declaration that provides an overarching vision where ecosystem health and biodiversity are prioritized in the land management framework. This would serve as a catalyst for change from the current approach that manages for sustainable forests (subject to constraints) to managing for ecosystem health, recognizing that resources (e.g., timber) are one of the many benefits that healthy ecosystems provide.

A declaration on ecosystem health and biodiversity would guide land management practices towards better alignment with goals of minimizing species loss (and preventing irreversible loss of biodiversity), maintaining vital ecosystem services, and ensuring the resiliency and long-term cultural, social, and economic wellbeing of communities across the province.

A key theme throughout the OGSR recommendations is that we should not only acknowledge Indigenous peoples as stewards of the environment, but also leaders in guiding how to establish a land management regime that achieves a higher standard of land care. A framework directed toward ecosystem health should be grounded in a Provincial-Indigenous government-to-government approach that is respectful of Indigenous rights and in alignment with the B.C. Declaration on the Rights of Indigenous Peoples Act.

*“Shift our thinking from trees and timber to healthy ecosystems that provide many benefits”*

*(OGSR report)*

The advice in the OGSR is consistent with themes heard through previous related government initiatives.

### **EXAMPLES OF VISIONS:**

The following vision statements are some existing examples that could be a starting point for discussion, inclusion or adaptation.

- UN Convention on Biological Diversity 2050 Vision: “Living in Harmony with Nature” where “by 2050, biodiversity is valued, conserved, restored and widely used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits essential for all people”.
- Together for Wildlife Vision: Wildlife and their habitats thrive, are resilient, and support and enrich the lives of all British Columbians.

## 5.2 PRINCIPLES

Principles are intended to create the environment needed for a declaration to be achieved. They are typically viewed as “rule” type statements that guide actions and decisions and can be used to interpret gaps in laws and guide policies. For example, to support the implementation of the UN Decade for Ecosystem Restoration (2021-2030), ten principles were developed to address two needs: first, the need for a shared vision of ecosystem restoration, and second, the need for guidance to maximize net gains for biodiversity, ecosystem health and integrity, and human health and well-being from all types of restoration projects, programs and initiatives.

In the case of an ecosystem declaration for B.C., principles can be used to inform the approach, outcomes, or the rules for developing and implementing existing and new enabling tools to implement the declaration (Phase 2 of this work).

OGSR has advised that UNDRIP could be a model for the B.C. declaration. For background information and examples of the use and purpose of principles adopted at the international level, refer to Module 3. This module also includes B.C. specific principles developed and applied for other related initiatives.

### EXAMPLES OF PRINCIPLES

The examples of principles provided below are based on the OGSR implementation advice and themes from previous what we heard reports (Module 4 for a summary of themes heard).

- Province-Indigenous government-to-government foundation
- Fairness and cohesion across sectors working towards common standards for achieving ecosystem health goals
- Holistic and integrated approach
- Science-based approach with equal respect for all knowledge systems
- Continuous learning and adaptation
- Inclusive and participatory
- Accountability, particularly to the public
- Responsive and flexible to regional circumstances and ecosystems

Additional Considerations	
1	Thinking about your community, the Nation(s) you work with, or your organization, and if principles are desired, which principles are important to include in the Declaration?
2	What other principles do you feel are important?

## 5.3 GOALS AND TARGETS

Many declarations include goals and targets that are aligned with the vision which helps set the strategic direction, informs decision-making and may catalyze behavioural change for communities and individuals. In addition to the goal of healthy ecosystems, OGSR contains other foundational goals including improved governance, sustainable practices (e.g., three zone policy) and improved public information. It will be important that the declaration is aligned with these foundational goals.

### Some examples of what is meant by an outcome-focused goal:

- Prevent irreversible biodiversity loss, maintain or improve landscape level ecosystem health (e.g., supporting connectivity) and vital ecosystem services.
- Greater co-ordination within and across different sectors working towards ecosystem health.
- Increased public awareness, understanding and support of biodiversity and ecosystem health goals and priorities, and how individuals and communities can manage for ecosystem health.

Additional Considerations	
1	Thinking about your community, the Nation(s) or organization you work with, which goals or outcomes are important to include in the Declaration?
2	Are there any other goals or outcomes that are important to include in the Declaration?

## 5.4 COMMITMENTS AND ACTIONS

Commitments in a Declaration can be action focused and related to goals and targets. Commitments set an accountability for the Province or others entering the commitment (e.g., signatories). While the declaration does not necessarily need to include commitments and actions, previous engagements on other government related initiatives showed frustration about there being too much talk from government and not enough action. Commitments and actions within the Declaration may help address this frustration.

Examples of different commitments/actions to show variety for scope and specificity

- We commit to implementing all recommendations of the OGSR and will develop a comprehensive action plan to support implementation by end of 2023.

- We commit to collaborating with Indigenous partners on policies and initiatives to advance implementation of the declaration that supports collaborative stewardship of the environment, addresses cumulative effects and respects Indigenous Knowledge.
- We commit to ensuring all-related provincial legislation, strategies and agreements, management systems and processes are consistent with the declaration.
- We commit to setting provincial ecosystem health targets and measures and will then to support all regions in the province to develop their own transition plans to meet their different and unique needs.
- We commit to monitoring progress through public annual reporting
- We commit to providing research support and incentives for innovative work targeted towards achieving ecosystem health goals and supporting sectors make the transition.

<b>Additional Considerations</b>	
1	Do you think that the declaration should be more directive and include commitments and actions?
2	If so, which commitments and actions are important to include in the Declaration?
3	What other commitments/actions are important to you?

## **5.5 ADDITIONAL CONSIDERATIONS FOR THE DECLARATION**

1. Are there other key themes or priorities that should be included in the Declaration?
2. What does "ecosystem health" and "biodiversity" mean to you? How should these terms be incorporated or conveyed within the Declaration? Is it sufficient to include these as concepts in the Declaration, or is more specificity required?
3. With an understanding of the type of themes you would like to see in the Declaration, now consider what form a declaration could take to best convey the key themes and priorities that you have identified.





# Action for Healthy Communities: Benefits of a Provincial Law for Ecosystem Health

September, 2022



**WEST COAST**  
Environmental Law



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Photos: Landon Parenteau; inset: Johnny McClung



# INTRODUCTION

Communities across British Columbia grapple with the consequences of a provincial legislative framework that prioritizes resource development over ecosystem health.



Photo: Sandy Miller

These impacts include risks to drinking water quality from industrial logging, risks to fisheries and wildlife from mining and hydroelectric development, and risks of flooding that are amplified by urban sprawl and industrial agriculture.

This thought paper addresses the following questions:

1. What are the impacts and cumulative effects of the provincial prioritization of resource development over ecosystem health on local communities in British Columbia?
2. How can a new, overarching provincial law to protect biodiversity and ecosystem health support community and ecosystem resilience?

In highlighting the impacts of the current patchwork of provincial laws on local communities, our goal is to provide local leaders with the tools to advocate for an overarching legal framework that protects biodiversity and ecosystem health, establishing a foundation for healthy communities and a healthy economy.



# Part 1

## Communities at Risk:

### Impacts of the Provincial Legal Framework on Local Communities<sup>1</sup>

Photo: Jess Barnett

<sup>1</sup> In exploring instances where both Indigenous and non-Indigenous communities have experienced negative impacts from the current provincial legal framework, we do not equate the two. While local governments like municipalities and regional districts exercise powers given to them through provincial legislation, Indigenous peoples hold inherent title and rights within their territories, exercising jurisdiction flowing from their own laws and recognized by the Canadian Constitution and the United Nations Declaration on the Rights of Indigenous Peoples.

## Case Study #1: Risks to Drinking Water: Private Forest Lands in the Alberni Valley

Photos: Robby Down; inset: Engin Akyurt



The City of Port Alberni and the Tseshaht and Hupacasath First Nations on central Vancouver Island are home to 19,000 residents who rely on China Creek for their drinking water supply. Their story provides one example of how weak provincial environmental laws negatively impact local communities.

The drinking watershed for all three communities is privately owned—a consequence of decisions of the provincial and federal governments more than a century ago to grant one-quarter of Vancouver Island to coal baron Robert Dunsmuir (“the E & N land grants”), including the forest lands above China Creek.

These private lands above the Alberni Valley’s water supply are governed by the *Private Managed Forest Land Act*, a provincial law that provides weak protection for biodiversity and ecosystem health. This legislation allows the economic interests of landowners to drive decision-making, while explicitly preventing local governments from restricting logging on private managed forest lands.



Under this current legislative framework, the long-term health of communities in the Alberni Valley depends on the decisions of foresters and corporate executives employed by private logging companies. The mandate of these private officials is to maximize profits, rather than safeguard public and ecosystem health. Government regulators provide little oversight of these private decisions. The result is that local communities in the Alberni Valley lack control over, and security of, their water supply.

The natural filtration of water provided by healthy forests and stability of slopes from landslides are at risk in places such as China Creek. Half of the old-growth forests above China Creek have already been logged. While the current owner of the lands, Island Timberlands (a logging company owned by BC pension funds), recently pledged to defer logging for 25 years, permanent protection is still lacking.<sup>2</sup>

A provincial law to protect biodiversity and ecosystem health could provide the tools to secure the Alberni Valley's drinking water supply in perpetuity—maintaining natural filtration, stabilizing the slopes above China Creek, and protecting vital habitat for the plant and animal species that rely on the area's old-growth forests.

Enacting such a law would fulfill the recommendation of the province's independent Old Growth Strategic Review (OGSR) Panel to: “Declare conservation of ecosystem health and biodiversity of British Columbia's forests as an overarching priority and enact legislation that legally establishes this priority for all sectors.”<sup>3</sup>

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<sup>2</sup> Andrew Willis, “Mosaic Forest halts logging on some of its timberlands as it opts to sell carbon credits”, *The Globe and Mail* (16 March 2022), online: <<https://www.theglobeandmail.com/business/article-mosaic-forest-halts-logging-on-some-of-its-timberlands-as-it-opts-to/>>

<sup>3</sup> Old Growth Strategic Review Panel, *A New Future for Old Forests: A Strategic Review of How British Columbia Manages for Old Forests Within its Ancient Ecosystems* (2020), p. 15 [OGSR Panel].

## Case Study #2: Risks to Fisheries and Wildlife: Industrial Development in the Omineca and Northeast

Photos: Tomas Williams; inset: Terra Firma



The Omineca and Northeast regions of British Columbia are prominent areas where industrial development—particularly mining, oil and gas, forestry, and hydroelectric development—has compromised human and ecosystem health, impacting local communities, particularly Indigenous communities.

Permitting processes and decision-making under resource statutes such as the *Mines Act*, *Oil and Gas Activities Act*, and *Environmental Management Act* have a long history of prioritizing development over ecosystem health, in part because they lack effective mechanisms for considering the cumulative effects of past, present and future development on important values and rights. While the *Environmental Assessment Act* seeks to “promote sustainability by protecting the environment and fostering a sound economy and the well-being of British Columbians and their communities”, key problems with the legislation include the fact that the Province is not pursuing regional assessments authorized under the Act, and that the statute is only applied to the largest projects, failing to address the problem of “death by a thousand cuts.”<sup>4</sup>

<sup>4</sup> Gavin Smith, *When Should Projects Get an Environmental Assessment? A Background on BC’s Proposed Changes to the Reviewable Projects Regulation* (Vancouver: West Coast Environmental Law, 2019).



Photo: Eric Buermeyer

The cumulative impacts of a statutory framework that does not prioritize ecosystem health have been felt by Indigenous and non-Indigenous communities across the Omineca and Northeast over many years, from a multitude of industrial activities. In *Yahey v. BC* (2021), for example, the BC Supreme Court stated that “provincial regulatory regimes do not adequately consider... the cumulative effects of industrial development.” Madam Justice Emily Burke found that “the cumulative effect of oil and gas and forestry authorizations in the context of existing private land, agricultural and hydro-electric authorizations” have infringed the rights of members of Blueberry River First Nations, signatories to Treaty 8 in the Northeast.<sup>5</sup> Madam Justice Burke noted significant declines in wildlife populations in Blueberry River First Nations territories, including negative impacts on caribou, moose, marten and fisher.<sup>6</sup>

The BC Wildlife Federation is among organizations calling on the Government of British Columbia to address the cumulative impacts of industrial development in Blueberry River First Nations territories.<sup>7</sup> The Federation is also a key member of the Fish, Habitat and Wildlife Coalition, among more than two dozen organizations, over 900 businesses and over 273,000 British Columbians who support:

*[P]rioritizing the conservation of fish, wildlife and habitat provincially and support[ing] this by enshrining it into legislative and regulatory mechanisms, decision-making, independent science oversight and planning functions, and establish new, dedicated funding to restore fish, wildlife and habitat.<sup>8</sup>*

<sup>5</sup> *Yahey v. British Columbia*, 2021 BCSC 1287, at paras. 1879–1881.

<sup>6</sup> *Ibid* at paras 736-737, 789, 810.

<sup>7</sup> “B.C. turns its back on science with changes to wildlife management”, (20 May 2022), online: *BC Wildlife Federation* <<https://bcwf.bc.ca/b-c-turns-its-back-on-science-with-changes-to-wildlife-management/>>.

<sup>8</sup> “Fish Wildlife and Habitat Coalition,” <<https://bcwf.bc.ca/fish-wildlife-and-habitat-coalition/>>.





Photo: Derek Belsham

In the Omineca region in the central interior, the Dakelh (Carrier) people have also experienced negative impacts from provincially authorized industrial development.

Provincial and federal authorization for damming and reversing the flow of the Nechako River, by the Aluminum Company of Canada (now Rio Tinto Alcan) under authority granted in the *Industrial Development Act, 1949*, negatively impacted the fishing, hunting and other economic activities of Dakelh peoples.<sup>9</sup> As Mr. Justice Nigel Kent of the BC Supreme Court recently found in *Thomas v. Rio Tinto Alcan (2022)*, this industrial activity “had hugely negative impacts”—including reducing sturgeon, chinook and sockeye stocks over a number of decades. However, because this harm was licensed by the provincial and federal governments, the Dakelh claim of private nuisance was dismissed at the trial level.<sup>10</sup>

Demonstrating the broad impacts of the decline in the health of the Nechako, as well as a shared commitment to address the risks to Indigenous and non-Indigenous communities, Dakelh Nations of the Nechako and the Regional District of Bulkley-Nechako signed a Memorandum of Understanding in 2021 pledging to work together to restore the health of the Nechako River.<sup>11</sup> In the words of the Regional District and the Dakelh Nation signatories, this agreement has “a particular focus on sturgeon and salmon populations that are on the precipice of extinction.”<sup>12</sup>

9 J.H. Mundie and R. Bell-Irving, “Predictability of the Consequences of the Kemano Hydroelectric Proposal for Natural Salmon Populations,” *Canadian Water Resources Journal*, vol. 11, no. 1 (1986): 14-25.

10 *Thomas and Saik’uz First Nation v. Rio Tinto Alcan Inc.*, 2022 BCSC 15, at para. 661.

11 “First Nations and RDBN sign MOU to restore health of Nechako river,” *Vanderhoof Omineca Express*, September 29, 2021.

12 Regional District of Bulkley Nechako, Saik’uz First Nation, Stelat’en First Nation, Nadleh Whut’en First Nation, “RDBN and the Nechako First Nations Sign MOU to Rehabilitate the Nechako River” (September 29, 2021), online: <<https://www.rdbn.bc.ca/media-status-updates/rdbn-and-nechako-first-nations-sign-mou-rehabilitate-nechako-river>>.

In signing the MOU, Regional District Chairperson Gerry Thiessen stated: “Local First Nations and non-Indigenous communities alike have suffered from the impacts of the Nechako water management regime, which has prioritized energy production over a healthy river and fish populations.”

Decisions of the provincial government that prioritize mining have also impacted local communities –from the provincial ‘free entry’ mineral claim system that assumes mining is the highest and best use of most lands in BC—to the economic and ecological impacts of the release of tailings and effluent from the Gibraltar and Mount Polley mines. These mining impacts have imperiled fish stocks, including contributing to a 2020 closure of the T̓silhqot̓in Nation’s fishery.<sup>13</sup>

Fisheries—and communities that rely on healthy fish stocks—have also been negatively impacted by weak regulation of the forestry sector throughout BC. The OGSR Panel noted that “the best timber growing sites... are also high in biological diversity, often critical to water and fish.”<sup>14</sup> The richest valley bottoms have often been the first to be logged off, harming fish stocks. Most logging in BC continues to be clear-cutting, in part because forest practices regulation only requires environmental objectives to be met to the extent that they do not “unduly reduce the supply of timber from British Columbia’s forests. The OGSR Panel noted that: “Alternate silviculture systems tend to preserve more of the inherent ecosystem services (e.g., Shelter for seedlings, filtered water, cooler streams for fish, carbon storage, habitat).”<sup>15</sup>

Turning the tide on this legacy of negative impacts to fish and wildlife will require a holistic, cross-cutting approach that addresses the legal shortcomings of multiple resource statutes. This is one reason why the OGSR Panel recommended that a new law establish conservation of biodiversity and ecosystem health as a priority across all sectors, not just forestry, stating:

*There is only one land and every land-based sector has some potential to compromise that land, some to the point of undermining provincial ecosystem health goals, if they do not adhere to a common standard. Aligning all sectors towards an overarching goal improves our chances of achieving our ecosystem health goals, reduces conflict between sectors and fosters a common target for everyone involved.*<sup>16</sup>

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13 G.G. Pyle, R.D. Plomp, L. Zink, and J.L. Klemish, “Invertebrate metal accumulation and toxicity from sediments affected by the Mount Polley mine disaster,” *Environmental Science and Pollution Research*, (2022); “Fish studies continue on Quesnel Lake six years after Mount Polley Mine breach,” *Quesnel Cariboo Observer*, August 2, 2020; “‘This is a catastrophic situation’: First Nations leaders close salmon fishery in T̓silhqot̓in,” *Williams Lake Tribune*, August 19, 2020; “Gibraltar Mine,” T̓silhqot̓in National Government website (viewed May 25, 2022) < <https://www.tsilhqotin.ca/gibraltar/> >.

14 OGSR Panel at 37.

15 OGSR Panel at 37 and 65.

16 *Ibid* at p. 49.

## Case Study #3: Risks of Flooding and Landslides: Failure to manage

Photos: Jake Hills; inset: Terra Firma



In November 2021, communities from the Nicola Valley to the Lower Fraser experienced devastating floods and landslides. The immediate cause was heavy rainfall from atmospheric rivers. These events revealed the underlying vulnerability of many communities in the floodplains, as well as on the major transportation corridors and farmland in the Lower Fraser.

In the Lower Fraser, local governments are largely responsible for the operation and upkeep of hundreds of kilometres of dikes to manage flood hazards. However, a 2015 study from the Province of British Columbia found that most of the dikes were not up to current standards and that upgrades would be prohibitively expensive<sup>17</sup>. As well, a number of First Nations

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<sup>17</sup> Minister of Forests, Lands and Natural Resource Operations “Lower Mainland Dike Assessment Final Report” (2015) <[https://www2.gov.bc.ca/assets/gov/environment/air-land-water/water/integrated-flood-hazard-mgmt/nhc\\_final\\_lower\\_mainland\\_dike\\_assessment.pdf](https://www2.gov.bc.ca/assets/gov/environment/air-land-water/water/integrated-flood-hazard-mgmt/nhc_final_lower_mainland_dike_assessment.pdf)>.



communities do not even benefit from the limited protection the dikes provide, being situated outside the diked areas. Dikes and pump stations also have harmful impacts on fish and fish habitats, ranging from barriers to fish passage to channelization and loss of riparian areas and wetlands. It is clear that more than a diking strategy is needed to support resilient communities and healthy ecosystems.

Further, there is evidence that increased flooding and landslides are not only caused by atmospheric rivers and a changing climate but by failure to manage forestry activities in upper watersheds. A 2019 UBC study confirmed that there is a very sensitive link between tree harvesting and increased flood risk<sup>18</sup>. A new law for biodiversity and ecosystem health can be a critical piece of an integrated approach to reducing flood and landslide risk for downstream communities and transportation corridors.



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<sup>18</sup> XuJian Joe Yu & Younes Alila, “Nonstationary frequency pairing reveals a highly sensitive peak flow regime to harvesting across a wide range of return periods” (2019) 444 *Forest Ecology and Management* 187–206.





## Part 2

# The Path Forward:

## Shared Security and Prosperity through a Provincial Law to Protect Biodiversity and Ecosystem Health

The preceding case studies have highlighted some of the local impacts of the current fragmented provincial statutory framework that prioritizes industrial development over ecosystem health.

Photo: Trevor McKinnon



We now turn toward the solution: community benefits arising from an overarching provincial law that protects biodiversity and ecosystem health across all sectors, supporting community and ecosystem resilience.

This new provincial statutory framework must be grounded in recognition of Indigenous title and land-management practices and embed ongoing mechanisms for governance and co-management by Indigenous and non-Indigenous governments and communities.

Any new law should legislatively establish conservation of biodiversity and ecosystem health as an overarching priority for all government decisions affecting the environment or natural resources. The law should include a “biodiversity shield” provision, mandating that a biodiversity lens be applied to all decisions across all sectors and prohibiting the Province from taking decisions that have the potential to jeopardize key ecosystem values (for example, through permits and authorizations for use of ‘Crown’ land, infrastructure development, or decisions on how financial resources are allocated).

Proactive planning for ecosystem health and biodiversity protection at all scales, and legal tools for implementing plans across all resource sectors, are other high potential approaches that could be embedded in new legislation. A new, funded panel of Indigenous and western scientists, independent of the Crown, could be created to help ensure that conservation designations, management objectives, cumulative effects thresholds and similar legal tools enabled by the law are based on best available science and Indigenous knowledge. Such a panel or body could also play a key role in publicly reporting the state of biodiversity and ecosystem health over time.



Photo: Monika Sojckova

The provincial law must recognize that Indigenous nations exercise inherent jurisdiction in their territories according to their own laws with respect to the conservation of biodiversity and ecosystem health and any resource development that may affect them. The new law must be co-developed with Indigenous peoples, and ensure that Indigenous understandings of their relationships with the biodiversity and ecosystems of their territories are recognized and respected in the Act. Further, the new law could provide tools that Indigenous nations can use to require the Crown to recognize and collaborate with them when they exercise their own laws to protect and conserve biodiversity, for example through the development of Indigenous Protected and Conserved Areas and Guardian programs.

These steps could go a long way toward “mainstreaming” a critical biodiversity lens into every environmental and natural resource decision the government makes, based on independent western and Indigenous science.

Embracing this new provincial statutory framework would place the long-term health of ecosystems at the centre of land use decision-making, benefiting local communities in several ways. Forestry, agriculture, energy, community development and other activities would be pursued in a manner that aligns with the healthy functioning of natural systems and conservation of biodiversity, rather than working at cross-purposes with these systems.

Activities where the ecological consequences were too high would be avoided, while investment and human effort would be concentrated in those activities that are consistent with maintaining healthy ecosystems and living within the carrying capacity of the province and planet Earth.

Benefits of this new provincial statutory framework include integrated rather than fragmented decision-making and greater local control of decisions impacting local Indigenous and non-Indigenous communities. Decisions would be grounded closer to home, integrating local impacts into decision-making processes. Cumulative impacts on local communities would receive thorough and proper consideration.

Prioritizing biodiversity and ecosystem health would also result in reduced infrastructure and emergency-managements costs for local communities, embracing the wisdom of “natural asset management”: working with nature to ensure clean drinking water, healthy fisheries and waterways, and mitigation of floods, landslides, wildfires and other risks. Working with nature empowers communities to avoid costly infrastructure spending on water treatment plants, dikes, pumps and other facilities needed to mitigate risks arising from industrial activities, building more resilient local economies.

## Conclusion

This thought paper has examined local impacts of the current provincial legislative framework that prioritizes industrial development over other considerations, while highlighting local benefits of an overarching provincial law that protects biodiversity and ecosystem health.

Photo: Ivan Bandura

Indigenous and non-Indigenous communities from Vancouver Island to the Northeast grapple with risks to drinking water from industrial logging, risks to fisheries and wildlife from mining and hydro-electric development, and risks of flooding from industrial agriculture and urban sprawl.

Embracing integrated rather than fragmented decision-making, and prioritizing biodiversity and ecosystem health, holds the promise of empowered local communities with greater local control of decisions, reduced infrastructure and emergency-management costs, and more resilient local economies.

We hope that readers will advocate for this change, securing healthy communities and healthy local economies through a provincial law for ecosystem health.<sup>19</sup>

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West Coast Environmental Law harnesses the power of law to solve complex environmental challenges. We are transforming environmental decision-making and strengthening legal protection for the environment through collaborative legal strategies that bridge Indigenous and Canadian law. By putting the law in the hands of communities and creating legal risk for those who would harm our land, air and water, we are building the collective power to achieve a more just and sustainable future for all.



Photo: Ben Den Engelsen