



Mr. Kishore Rao
Director
World Heritage Centre
UNESCO
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France

Subject: State of Conservation of Wood Buffalo National Park

Dear Mr. Rao:

Kishore,

I am writing on behalf of Canada in response to your letter of December 11, 2014 to H.E.M. Jean-Pierre Blackburn, Ambassador and Permanent Delegate of Canada to UNESCO about the state of conservation of Wood Buffalo National Park.

Following a review of the petition submitted to the World Heritage Committee by the Mikisew Cree First Nation about Wood Buffalo National Park, I am pleased to provide the following comments.

The petitioners believe that Wood Buffalo should be inscribed on the List of World Heritage In Danger on the basis of a number of ascertained and potential dangers facing the Peace-Athabasca Delta (PAD) associated primarily with hydro-electric development, oil sands development and climate change. They justify their arguments for danger listing by citing a number of publicly available scientific studies and reports that focus on the issues of concern, including several produced by Parks Canada and Environment Canada. In general, the petitioners' presentation of available science is accurate.

That said, in Canada's view, the petitioners have overstated the case for danger listing. Canada considers that, on balance, the Outstanding Universal Value (OUV) of Wood Buffalo National Park is currently being protected through a robust and well-developed legislative, regulatory and policy framework at the federal and provincial levels. The following will elaborate this position and underscore Canada's efforts and commitments to protecting Wood Buffalo into the future.

Overstated Claims

When the World Heritage Committee adopted, in 2006, a Statement of Significance for Wood Buffalo National Park, based on the Committee's decision to inscribe it on the World Heritage List in 1983, it confirmed Wood Buffalo's OUV on the basis of criteria vii, ix and x. Specifically, the Statement of Significance describes the following key attributes of Wood Buffalo as the basis for its OUV:

- great concentrations of migratory wildlife;
- rare and superlative natural phenomena that include a large inland delta, salt plains and gypsum karst;
- the park's ecological completeness, its status as the largest example of the Great Plains-Boreal grassland ecosystem of North America and the fact that it is the only



- place where the predator-prey relationship between wolves and wood bison has continued unbroken over time; and
- the park's status as the only place protecting breeding habitat for the whooping crane and therefore its critical importance to *in situ* conservation of this species.

Notwithstanding the studies that the petitioners cite, it should be noted that any impacts associated with developments outside (and south of) the park are not necessarily expected to occur on a park-wide scale or to affect all of the park's natural values. At 45,000km², the park's size provides for considerable potential resilience and any impacts on the approximately 5,000 km² delta region may be limited to that region. There is, for example, no conclusive evidence demonstrating impacts on the predator-prey relationship between wolves and bison, or on whooping crane populations (whose nesting area in the north of Wood Buffalo is approximately 200 km away from the PAD), and any impacts associated with developments outside the park would not affect the internationally significant karst formations in the park, north and west of the PAD.

Canada's perspective on the current state of conservation of Wood Buffalo is echoed by a recent report on the park released by the International Union for the Conservation of Nature (IUCN) in November 2014. As part of its independent assessment of the "conservation outlook" of all natural World Heritage Sites around the world, IUCN examined the conservation outlook for Wood Buffalo and concluded "in general, the site's conservation values are sound and, in fact, improving with respect to overall boreal forest ecology and bison and whooping crane populations." It further concluded that Wood Buffalo's overall conservation outlook is "good with some concerns." The "concerns" raised in IUCN's assessment relate to impacts on the Peace-Athabasca Delta from dam-caused hydrological alteration, upstream industrial development and climate change, effectively the same issues raised by the petitioners. That being said, IUCN did not conclude that Wood Buffalo is facing a critical situation.

Robust Legislative, Regulatory and Policy Framework

The petitioners refer to a number of specific proposed developments outside the park, including the proposed Site C Dam on the Peace River in British Columbia and proposed mining activity in proximity to Wood Buffalo's southern boundary. It is important to recognize that Canada has – at both the federal and provincial levels – robust environmental assessment and permitting processes. The proposed Site C Dam, for example, underwent a thorough federal-provincial environmental assessment by an independent panel. This process included extensive consultations with the Canadian public and Aboriginal groups and provided the scientific and technical expertise to enable an informed decision by both governments. The Joint Review Panel that was established by the federal government and the Government of British Columbia for this purpose concluded that there would be no effects of the project on the environment in the PAD. When the governments announced their decisions in the fall of 2014, enabling the project to proceed, they also defined over 80 legally binding conditions that must be fulfilled throughout the life of the project. Further, the proponent will be required to obtain additional federal and provincial regulatory authorizations, approvals or permits under relevant federal and provincial legislation, such as the *Fisheries Act* and the *Navigation Protection Act*, if it decides to proceed with the project. Future proposed development projects in the vicinity of Wood Buffalo will be subjected to similar environmental assessment and regulatory processes under the relevant federal and provincial legislation.

Under the *Canada National Parks Act*, the conservation and protection of the ecological integrity of our national parks – including Wood Buffalo – is a core mandate for Parks Canada. For the Peace Athabasca Delta specifically, the 2010 Wood Buffalo National Park Management Plan includes a commitment to address the challenges of conserving, and where required, restoring ecological integrity in the delta through engaging and cooperating with Aboriginal partners, communities, governments and other stakeholders.

One of Canada's principle efforts in this respect is the Peace Athabasca Delta Ecological Monitoring Program (PADEMP), established in 2008 in response to concerns about the cumulative impacts of expanding regional development and climate change on the delta with the goal of developing an integrated ecological monitoring program. It is a partnership involving government agencies, conservation groups and local Aboriginal groups, designed to incorporate both Traditional Ecological Knowledge (TEK) and western science. PADEMP's work complements and incorporates the results of other relevant monitoring programs in the region such as the *Joint Alberta-Canada Implementation Plan for Oil Sands Monitoring* (JOSM) and community-based monitoring (CBM) programs such as the Mikisew Cree First Nation and Athabasca Chipewyan First Nation CBM. IUCN's conservation outlook assessment for Wood Buffalo recognizes PADEMP as an example of best practise.

One of PADEMP's key projects is a Peace Athabasca Delta Vulnerability Assessment which will summarize current knowledge of key ecosystem components and their vulnerability to stressors. The goal of the assessment is to identify which stressors currently represent the greatest threat to the delta and to guide development of an integrated monitoring program and area management plan for the delta in Wood Buffalo National Park. More information about PADEMP is available at www.pademp.com.

The governments of Canada and Alberta are committed to developing the oil sands, located south of Wood Buffalo National Park, in an environmentally responsible way. This is why, in 2012, they announced the JOSM. The work done under this plan is monitoring more sites, more frequently, for more compounds with more sensitive detection methods and integrates results from air, water, and biodiversity. This has resulted in significant improvements in the ability to detect environmental changes and cumulative impacts due to oil sands resource development, which in turn informs government and industry decision-making processes. More information is available at www.jointoilsandsmonitoring.ca.

As follow-up to the Joint Review Panel of the Site C Dam proposal, the Government of Alberta's Transboundary Waters Secretariat has twice met with Parks Canada and the Mikisew Cree First Nation to explore the potential for strategic flow regulation along the Peace River to augment flooding of the PAD in order to preserve the delta's aquatic ecosystems. These discussions aim to develop a proposal for strategic flow regulation for submission to B.C. Hydro - the proponent of the Site C Dam project – who indicated during the Joint Review Panel process that it would be willing to consider such a proposal.

A more comprehensive list of relevant monitoring, research and assessment projects is attached, illustrating the range of active conservation projects underway to support the conservation of Wood Buffalo's Outstanding Universal Value.

Commitments moving forward

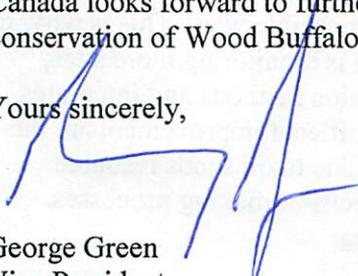
In recent correspondence with the Chief of the Mikisew Cree First Nation, Canada's Minister of the Environment and Minister responsible for Parks Canada outlined a number of federal government commitments in relation to issues addressed in the petition. Specifically, she noted that the federal government commits to:

- "Continued monitoring of water levels and stream flow at hydrometric stations along the Peace River and in the Peace Athabasca Delta, and continued Parks Canada ecological integrity monitoring in the Peace Athabasca Delta;
- "Enhanced monitoring and research regarding the regional hydro-climatology and ecology of the Peace Athabasca Delta and the effects flow regulation, water withdrawals, and climate changes might have on its productivity and biodiversity, in collaboration with local Aboriginal groups, and governmental or non-governmental organizations; and
- "Participation in discussions with other parties including Aboriginal groups, British Columbia, BC Hydro and Alberta, on best management practises that can be applied to restore and preserve the aquatic ecosystems in the Peace Athabasca Delta."

In this context, in the coming months, Parks Canada – both as Canada's State Party representative for the World Heritage Convention and the management authority for Wood Buffalo National Park – will discuss the issues raised in the petition with the provinces of Alberta and British Columbia, the Government of the Northwest Territories, Aboriginal groups, B.C. Hydro, and industry and community stakeholders. These discussions will build on previous discussions undertaken during relevant Canadian regulatory processes, with particular emphasis on Canada's commitments to conserve the Outstanding Universal Value of Wood Buffalo as a UNESCO World Heritage site.

Canada looks forward to further cooperation with the Committee in relation to the state of conservation of Wood Buffalo National Park, as may be necessary.

Yours sincerely,



George Green
Vice President

Heritage Conservation and Commemoration Directorate, Parks Canada Agency
and
Head of Canadian Delegation to the World Heritage Committee

cc Nicolas Dimic, Deputy Permanent Delegate of Canada to UNESCO
Louise Filiatrault, Secretary-General, Canadian Commission for UNESCO
Édouard Huot, Policy Advisor, United Nations Division, Department of Foreign Affairs, Trade and Development Canada
David Britton, A/FUS SWNWT Field Unit

Selected Current Conservation Projects

Wood Buffalo National Park World Heritage Site

| Brief project description | Organizations |
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| <p>Flood Monitoring and Water Extent in the Peace-Athabasca Delta</p> <p>Objectives: To provide annual measurement of wetlands in the delta; to determine areas covered by open water, emergent vegetation and dry land.</p> | Parks Canada – Wood Buffalo National Park |
| <p>Suspended sediment sampling on the Athabasca River downstream of the oil sands region in Alberta</p> <p>Objectives: To assess contaminant levels in suspended sediments from the Athabasca River downstream of the Alberta oilsands; to compare results from two methodologies for collecting the suspended sediments (use of continuous flow centrifuges vs. passive collection)</p> | Environment Canada and Parks Canada – Wood Buffalo National Park |
| <p>Water Quality Monitoring on the Athabasca and Peace Rivers</p> <p>Objectives: To monitor water quality along the lower reaches of the Athabasca and Peace Rivers.</p> | Environment Canada and Parks Canada – Wood Buffalo National Park. |
| <p>Peace-Athabasca Delta Hydro-Ecology</p> <p>Objective: To develop a science-based framework for the monitoring and assessment of deltaic wetland ecosystems, with a focus on the Peace-Athabasca Delta. This will include the development of diagnostic tools that can be used to interpret hydrological and ecological change in deltaic environments.</p> | Environment Canada – Water-Climate Impacts Research Centre, and Parks Canada |
| <p>Assessing impacts of oil sands development on fish eating birds</p> <p>Objectives: To assess the state of the environment, with a focus on identifying pathways of toxic chemical transfer to wildlife and possible impacts; to measure contaminant levels in fish-eating bird eggs and determine spatial and temporal trends</p> | Environment Canada / Parks Canada / Mikisew Cree Community-Based Monitoring Program |

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| <p>Health of Amphibian Populations</p> <p>Objectives: To address concerns about the potential impacts of industrial development, including oil sands mining activities, in the Peace-Athabasca Delta and elsewhere in northern Alberta and the NWT; to assess the health of frog populations at varying distances from disturbances including oil sands operations. The health of frogs can serve as an indication of the larger ecosystem; to monitor the level of contaminants such as mercury in frog tissues and pond water because contaminants may enter the food chain through frogs</p> | <p>Keyano College, Environment Canada and Parks Canada – Wood Buffalo National Park.</p> |
| <p>Acid Lakes Survey</p> <p>Objectives: To obtain contemporary water chemistry data from a randomly-selected subset of lakes in the region potentially affected by acidifying emissions from the oil sands industry.</p> | <p>Environment Canada</p> |
| <p>Air Quality Monitoring – CAPMoN</p> <p>Objective: To monitor the long-range transport and trans-boundary transport of air-borne contaminants, including those emitted from the oil sands development area.</p> | <p>Environment Canada and Parks Canada – Wood Buffalo National Park</p> |
| <p>Peace-Athabasca Delta Vegetation Monitoring</p> <p>Objective: To monitor the change in vegetation species composition in the delta.</p> | <p>Parks Canada – Wood Buffalo National Park</p> |
| <p>Monitoring Water Quality in Lakes</p> <p>Objective: to monitor the water quality of Pine Lake and Rainbow Lakes as representative lake ecosystems in the park.</p> | <p>Parks Canada – Wood Buffalo National Park</p> |
| <p>Community-based Monitoring Program</p> <p>Objective: To track changes to the water and land in the traditional areas of the Mikisew Cree and Athabasca Chipewyan First Nations.</p> | <p>Mikisew Cree First Nation and Athabasca Chipewyan First Nation</p> |
| <p>Bison Disease Containment Strategy</p> <p>Objective: To reduce the potential for disease transmission from the greater Wood Buffalo National Park bison population to neighboring disease-free wood bison herds and domestic cattle</p> | <p>Parks Canada – Wood Buffalo National Park, Government of the NWT, Government of Alberta</p> |

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| herds. | |
| <p>National Wood Bison Recovery Strategy</p> <p>Objective: To ensure the recovery of Wood Bison, a threatened species in Canada</p> | Parks Canada, Environment Canada, Alberta, Saskatchewan, Yukon, NWT, British Columbia, Manitoba |
| <p>Recovery Strategy for the Whooping Crane in Canada</p> <p>Objective: To ensure the recovery of whooping cranes, an endangered species in Canada</p> | Parks Canada, Environment Canada. NWT, Alberta, Saskatchewan and Manitoba |
| <p>Biomonitoring 2.0</p> <p>Objectives: To identify and quantify species richness (biodiversity) at a site using genetic material gathered from pitfall trapping, soil, water and benthic sampling. To obtain biodiversity sample sets from wetland sites in Wood Buffalo National Park for DNA sequencing analysis; to obtain local habitat information associated with the biodiversity samples collected – including historical trend information, GIS data, and local physico-chemical analysis.</p> | Environment Canada, Parks Canada, Aurora Research Institute, Ontario Genomics Institute, and other partners. |
| <p>Muskrat Monitoring</p> <p>Objectives: To determine: the trend in relative abundance of muskrats within the Peace-Athabasca Delta over time; whether there is a difference in muskrat abundance between basins receiving water from the Athabasca and Birch Rivers; whether there is a difference in water quality between productive and unproductive basins; how long it takes for muskrats to re-establish after average to above-average snowfall years, or after flood events.</p> | Peace-Athabasca Delta Ecological Monitoring Program (PADEMP) |
| <p>Wood Bison Population Monitoring</p> <p>Objective: To provide an estimate of the number of wood bison in the park.</p> | Parks Canada – Wood Buffalo National Park |
| <p>Moose Population Monitoring</p> <p>Objective: To provide an estimate of the number of moose in the park.</p> | Parks Canada – Wood Buffalo National Park |
| <p>Snowshoe hare monitoring</p> <p>Objective: To provide an indication of relative abundance of snowshoe hare in the park.</p> | Parks Canada – Wood Buffalo National Park |

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| <p>Whooping Crane Monitoring</p> <p>Objective: To document the number of nesting pairs and the number of fledged chicks each year.</p> | <p>Environment Canada and Parks Canada</p> |
| <p>Fire Frequency and Extent Monitoring</p> <p>Objective: To monitor the annual area of forest burned in the park.</p> | <p>Parks Canada – Wood Buffalo National Park</p> |