



Sunshine Coast
Conservation
Association

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“Protecting Vulnerable Species: A Draft Five Year Plan for Species at Risk in BC”

The Sunshine Coast Conservation Association (SCCA) has worked since 1996 to protect the biodiversity and integrity of our air, water, forests, and marine environments for all time. We are a registered charitable organization representing approximately 225 members and 30 local citizens' groups of the greater Sunshine Coast region.

On August 31, 2011, the SCCA submitted a letter titled “*A Few Comments about the Report of the BC Species at Risk Task Force*”; in it we agreed with a number of the recommendations of the Task Force and presented our rationale for a strong, single piece of legislation that would protect species and ecosystems-at-risk.

Please accept this letter as our comments on the Province's recently released draft plan “*Protecting Vulnerable Species: A Draft Five Year Plan for Species at Risk in British Columbia*”.

As your Draft states, British Columbia has the highest national species diversity, and an increasing amount of species and ecosystems at risk. At the same time, BC citizens hold environmental protection as a fundamental value and expect the provincial government to look after this common pool resource. As one example, the 2008 Species at Risk Public Opinion Survey conducted by the Faculty of Forestry at UBC shows that more than 90% of respondents agree (56% strongly agree) that Species at Risk protection and recovery both inside and outside the areas where they live is important (http://www.hd-research.ca/sar-pos/BC-SaR-POS_SaRCO-MoE_08-06-16.pdf).

Describing the species-at-risk plan as one “...that successfully balances British Columbia’s *economic*, environmental and community priorities ...,” page 15 (emphasis this author), is not appropriate to the strong legislation that is required. As written, the Plan gives credence that strong environmental protection is a threat to the economy. This belief lacks merit and one needs to look no further than the Conference Board of Canada which ranked Sweden, Finland and Norway as outstripping Canada in terms of economic competitiveness yet these same three countries top the rankings on environmental performance (*The Right to a Healthy Environment*, David R. Boyd, UBC Press, 2012, p. 6).

We also note that relying on voluntary stewardship efforts by the community and non-governmental organizations in the protection and recovery of species and ecosystems at risk, although important, is not a substitute for strong, clear legislation. Voluntary stewardship will always happen as long as citizens care about their environment. But without laws that protect critical habitat, there is no foundation upon which to build, no commonly accepted rules when a given area is proposed to be altered. With this arrangement currently in place, British Columbia finds itself in its current position of disappearing species and habitat.

If the authors believe that working with the public and other stewardship groups is indeed desirable, then we recommend that the paper “The Last Place on Earth” authored by Ecojustice Canada et al, October 2008 be re-examined, brought up to date and adopted. A strong piece of legislation must include specific strategies to protect and to recover species and ecosystems at risk; identified mechanisms for enforcement and identified sources of funding. As the above report explains, the legislation must be underpinned with the internationally recognized precautionary principle, the principle of inter-generational equity, and the polluter-pays principle.

We ask that this Draft be reconsidered and that a proposal quickly be put forward incorporating the above points.

Respectfully submitted,

Jason Herz
Chair