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**Status Report**  
of the Commissioner of  
the Environment and  
Sustainable Development  
to the House of Commons

**MARCH**

**Ecosystems**

**Chapter 4**  
Federal Protected Areas for Wildlife



Office of the Auditor General of Canada

*The March 2008 Status Report of the Commissioner of the Environment and Sustainable Development comprises The Commissioner's Perspective—2008, Main Points—Chapters 1 to 14, Appendices, and 14 chapters. The main table of contents for the Report is found at the end of this publication.*

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Chapter

# 4

Federal Protected Areas for Wildlife

*All of the audit work in this chapter was conducted in accordance with the standards for assurance engagements set by The Canadian Institute of Chartered Accountants. While the Office adopts these standards as the minimum requirement for our audits, we also draw upon the standards and practices of other disciplines.*

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# Ecosystems

## Federal Protected Areas for Wildlife

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### Main Points

#### What we examined

Environment Canada is responsible for managing 51 national wildlife areas and 92 migratory bird sanctuaries. These sites are established under legislation to protect significant habitat for wildlife, including species at risk and migratory birds. These federal protected areas for wildlife were the focus of our audit.

In 2001, we found that Environment Canada lacked up-to-date management plans and species inventories for its protected areas in the Great Lakes and St. Lawrence River basin. Further, we were concerned about inadequate enforcement of regulations pertaining to those protected areas. We recommended that the Department assess the state of its protected areas in the basin, prepare a strategy for managing them, and report regularly on their condition and management. Environment Canada agreed with our recommendations and committed to take appropriate action, contingent on available resources.

In our follow-up work for this chapter, we examined Environment Canada's progress in implementing our recommendations. Although our 2001 audit focused on the Great Lakes and St. Lawrence River basin, the Department manages its activities on a national basis and therefore our follow-up audit examined its management of protected areas from a national perspective.

#### Why it's important

The federal government has frequently asserted that sound management of Canada's natural resources and biodiversity is critical to ensuring our social, economic, and environmental well-being. However, according to Environment Canada, the wildlife habitat that contributes to Canada's natural heritage is being lost. Habitat loss and degradation is now the single greatest threat to plants and animals in Canada.

The protection and conservation of habitat is critical to Canada's efforts to conserve biodiversity. Environment Canada's protected areas network is intended to provide a safe haven for birds, a home for species at risk, and protection for wetlands that are vital to maintaining water quality and quantity. If Canada's biodiversity is

to be safeguarded, the network's ecological integrity must be actively protected against the increasing threats of human disturbance, development pressures, invasive species, pollution, and climate change.

### What we found

- Environment Canada has made unsatisfactory progress in responding to our recommendations on national wildlife areas and migratory bird sanctuaries. These areas are at risk.
- Environment Canada has identified specific threats to each of its protected areas, but the Department has not assessed whether conditions are improving or deteriorating at the sites, nor used the information collected to address threats on a priority basis.
- Environment Canada has developed a national strategy to guide the management of sites in its protected areas network, but the strategy is not being fully implemented. For example, most protected areas still lack up-to-date management plans.
- Environment Canada has not established explicit performance expectations against which progress can be assessed, and does not comprehensively monitor or regularly report on the condition and management of its network of protected areas.
- According to its own analyses, Environment Canada has allocated insufficient human and financial resources to address urgent needs or activities related to the maintenance of sites and enforcement of regulations in protected areas.

**The Department has responded.** The Department agrees with the recommendation. Its detailed response follows the recommendation in the chapter.

## Introduction

For more information on the federal government's management of species at risk, please consult Chapter 5, Protection of Species at Risk, and Chapter 12, Listing of Species at Risk, in this report.



1887—Last Mountain Lake is established as Canada's first bird sanctuary.

**4.1** To ensure their survival, species require adequate habitat within which to live, breed, and migrate. According to Environment Canada, habitat loss and degradation is now the single greatest threat to plants and animals in Canada. A habitat does not have to be totally destroyed to make it unsuitable for some species. The presence of people and associated disturbance can cause some species to abandon habitats or prevent them from breeding successfully. About 60 percent of species at risk are affected by habitat problems.

**4.2** Recognizing this, over the past century Canada has enacted legislation, signed international agreements, and developed policies to protect migratory birds, species at risk, and their habitats:

- **1887**—Last Mountain Lake is established as Canada's first bird sanctuary. This site is now a national wildlife area, migratory bird sanctuary, and wetland of international importance.
- **1917**—In response to the Canada–United States Migratory Birds Convention (1916), Canada enacts the *Migratory Birds Convention Act* to protect migratory birds from harmful activities such as hunting. Regulations under the Act establish migratory bird sanctuaries to support the seasonal habitat needs of migratory birds.
- **1973**—Canada enacts the *Canada Wildlife Act*. This Act enables the designation of national wildlife areas for the purposes of wildlife research, conservation, and interpretation.
- **1981**—Canada adopts the 1971 *Ramsar Convention on Wetlands of International Importance* and its objectives of stemming progressive encroachment on and loss of wetlands, and of ensuring the conservation and sustainable use of wetlands.
- **1992**—Canada adopts the *Convention on Biological Diversity*, including its objectives to establish and manage protected areas where special measures are needed to conserve biodiversity.
- **1994**—The *Canada Wildlife Act* is amended to enable the establishment of marine wildlife areas to protect habitat in Canada's coastal waters. While several sites are under study, no marine wildlife area has yet been created.
- **2002**—The *Species at Risk Act* is passed by Parliament.

**4.3** Protected areas are internationally recognized as an effective tool for the conservation of biodiversity. Environment Canada is responsible for a national network of areas intended to protect significant habitat

for wildlife, including migratory birds, and species at risk. This network currently includes 51 national wildlife areas and 92 migratory bird sanctuaries (Exhibits 4.1 and 4.2). Of this total, 15 sites also contain wetlands recognized as being of international importance. The estimated 11.8 million hectares protected by this network are second in area only to Canada’s national parks (36 million hectares).

**4.4** Exhibit 4.3 presents the key features of Canada’s national parks and federal protected areas for wildlife.

**4.5** As noted in Exhibit 4.3, Environment Canada does not own the land on which most migratory bird sanctuaries are situated. While it maintains a responsibility for enforcing regulations and monitoring migratory birds in these areas, the Department considers the management of these sanctuaries, including any measures put in place to conserve their habitat, to be the responsibility of the landowner.

**Exhibit 4.1** Environment Canada maintains a national network of protected areas



Source: Environment Canada, 2007

### What we examined in 2001

A protected area has **ecological integrity** when its natural components (plants, animals, and other organisms) and processes (such as growth and reproduction) are intact.

**4.6** In 2001, we examined the federal government’s efforts to conserve wetlands habitat in the Great Lakes and St. Lawrence River basin, including the management of national wildlife areas and migratory bird sanctuaries. We found that the **ecological integrity** of these protected areas was at risk, because Environment Canada lacked the human and financial resources to manage them effectively.

### Events since 2001

**4.7** Passed in 2002, the *Species at Risk Act* introduces a new legal obligation for wildlife protection and conservation. Where species at risk are identified in national wildlife areas and migratory bird sanctuaries, federal landowners will be required to respect prohibitions under the Act.

The **National Round Table on the Environment and the Economy** was established as an advisory body reporting to governments and the Canadian public. Its members are appointed by the Prime Minister and include leaders in business and labour, universities, environmental organizations, Aboriginal communities, and municipalities.

**4.8** In 2003, the **National Round Table on the Environment and the Economy** issued *Securing Canada’s Natural Capital: A Vision for Nature Conservation in the 21st Century*. This report noted that national wildlife areas and migratory bird sanctuaries were under-used federal tools for conservation. The report recommended that the federal government allocate \$175 million over the next five years to enhance the national network.

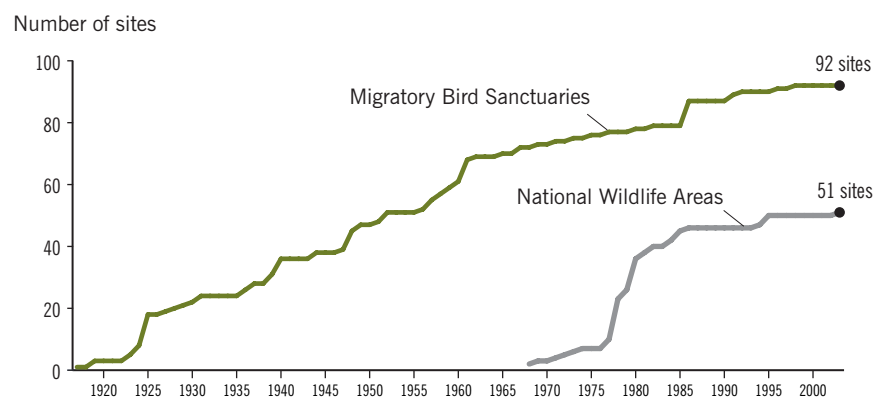
### Focus of the audit

**4.9** The objective of our follow-up audit was to determine whether Environment Canada has made satisfactory progress in implementing recommendations and observations made in our 2001 Report with



Ontario’s Long Point National Wildlife Area contains more than 30 species at risk. At least 25 sites in the network each protect more than 5 species at risk.

**Exhibit 4.2** Since 1917, 143 national wildlife areas and migratory bird sanctuaries have been created



Source: Environment Canada, 2002

**Exhibit 4.3 Key features of Canada's federal protected areas**

Protected areas	Number of sites <sup>1</sup>	Total area <sup>1</sup> (hectares)	Authority	Federal lead	Land ownership	Purpose	Criteria for designation	Prohibited activities
<b>National Parks</b>	46 <sup>2</sup>	36,090,310 <sup>2</sup>	<i>Canada National Parks Act</i>	Parks Canada	federal	Dedicated to the people of Canada for their benefit, education, and enjoyment.	Supports a representative sample of Canada's natural heritage.	Industrial or commercial use of resources is generally not permitted. Recreational activities are permitted in all national parks.
<b>National Wildlife Areas</b>	51	529,170	<i>Canada Wildlife Act</i>	Environment Canada	mostly federal	To protect wildlife and wildlife habitat for the purpose of conservation, research, and/or interpretation.	Supports an important population of migratory birds, species at risk, or rare or unusual wildlife habitat.	No activities are allowed without a permit. Activities such as recreation are allowed in most areas.
<b>Migratory Bird Sanctuaries</b>	92	11,239,722	<i>Migratory Birds Convention Act</i>	Environment Canada	mixed <sup>3</sup>	To protect migratory birds, their nests, eggs, and habitat.	Supports and/or provides critical habitat for an important population of migratory birds.	No hunting or disturbance of migratory birds or their nests without a permit. Activities such as recreation are allowed in most areas.

<sup>1</sup>Changes to areas may be made over time, for example, as land claims are settled or as (parts of) a protected area are otherwise deregulated.

<sup>2</sup>Total includes both existing national parks and land withdrawn for future national parks or national park reserves.

<sup>3</sup>Mixed land ownership—federal, provincial, other Crown, municipal, and/or private

respect to assessing, monitoring, maintaining, and reporting on the state and management of its national wildlife areas and migratory bird sanctuaries. Although our 2001 audit focused on the Great Lakes and St. Lawrence River basin, the Department manages its activities on a national basis and therefore our follow-up audit examined its management of protected areas from a national perspective.

**4.10** More details on the audit objective, scope, approach, and criteria are in **About the Audit** at the end of this chapter.

## Observations and Recommendation

### Assessing risks to protected areas

#### The Department has made progress in assessing risks to protected areas

**4.11** In 2001, we identified weaknesses in Environment Canada's monitoring of national wildlife areas and migratory bird sanctuaries. We recommended that the Department comprehensively assess the environmental state and management of its protected areas.

**4.12** In 2002, Environment Canada responded by producing a report on the ecological integrity of Canada's national wildlife areas and migratory bird sanctuaries. The Department's *State of Federal Protected Areas for Wildlife* report identifies the sites that are most at risk and the relative importance of numerous existing and potential threats to their ecological integrity.

**4.13** Based on this report, which provides Environment Canada's first comprehensive snapshot of its protected areas network, we conclude that the Department has made satisfactory progress since 2001 in assessing the environmental state of its protected areas (Exhibit 4.4).

#### Exhibit 4.4 Progress in addressing our recommendation on assessing the state and management of federal protected areas is satisfactory

Recommendation	Progress
Environment Canada should comprehensively assess the environmental state and management of national wildlife areas and migratory bird sanctuaries in the basin. (2001 Report of the Commissioner of the Environment and Sustainable Development, Chapter 1, section 5.1.24)	Satisfactory

**Satisfactory**—Progress is satisfactory, given the significance and complexity of the issue, and the time that has elapsed since the recommendation was made.

**Unsatisfactory**—Progress is unsatisfactory, given the significance and complexity of the issue, and the time that has elapsed since the recommendation was made.

### Regular monitoring of conditions still needed

**4.14** Despite this progress, we are concerned that regular monitoring—a critical management tool—is not being done. Specifically, we are concerned that

- the survey response for most sites is not supported by the scientific data that is required to assess the condition of habitats and species; and
- no follow-up survey has been completed or is planned to determine whether conditions across the network are improving or deteriorating.

**4.15** The Department's 2002 report also had minimal impact on the management of protected areas. The report included 18 recommendations for more effective management; however, at the time of our examination, the Department had yet to align its priorities and resources to address urgent needs in the areas of greatest concern, such as controlling human disturbance.

**4.16** Protected areas are under threat from stressors that originate both inside and outside their boundaries. Exhibit 4.5 summarizes the key threats to protected areas and estimates the number of sites affected. While tourism and human disturbance threaten the largest number of sites, risks such as oil and gas development have a greater potential for harm. These pressures are increasing. For example, the environmental impact of proposals for natural gas development and transportation is under review in the Suffield National Wildlife Area and the Kendall Island Migratory Bird Sanctuary. Elsewhere, there is pressure to allow other activities that may conflict with habitat conservation, such as agriculture, recreation, and road building.



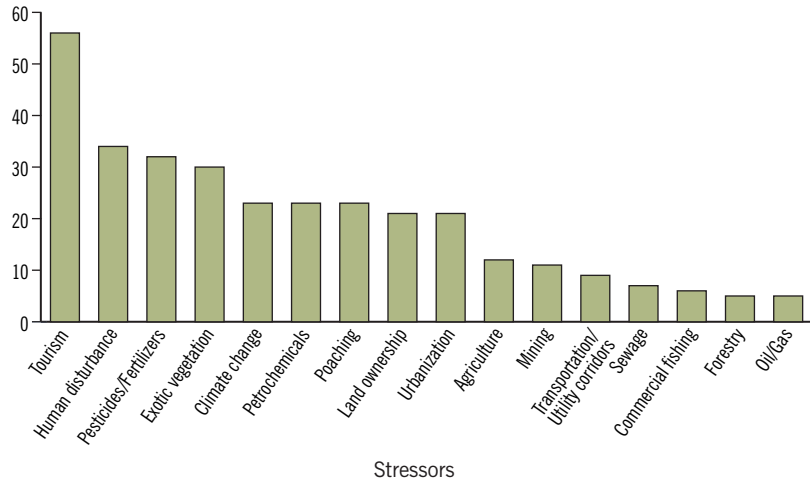
The Victoria Harbour Migratory Bird Sanctuary has become extensively urbanized, limiting its value as a habitat for migratory birds.

**4.17** Currently, all proposed activities are considered on a case-by-case basis. According to Environment Canada, nationally consistent policies are necessary to address rapidly growing pressures on protected areas. The Department is drafting a policy on the regulation of activities in such areas. When completed, this policy is intended to address ongoing concerns about the lack of adequate guidelines to identify appropriate and allowable activities in protected areas.

**4.18** According to Department officials, at least 10 sanctuaries may no longer meet the criteria of a protected area. The habitat in these areas has been converted to other uses such as urban developments, marinas, and golf courses. Since 1980, several sanctuaries have had their protected designation removed.

**Exhibit 4.5 Environment Canada's protected areas face significant threats to their ecological integrity**

Number of protected areas reporting existing or potential stressors

Source: Environment Canada, *State of Federal Protected Areas for Wildlife*, 2002**Applying a strategic approach**

**4.19** In 2001, we observed that Environment Canada lacked the human and financial resources necessary to provide effective management of protected areas. We recommended that Environment Canada prepare a strategy for effectively managing national wildlife areas and migratory bird sanctuaries. In response, Environment Canada agreed to develop such a strategy, but noted that implementing it would depend on available resources. We expected that, in the six years that have passed since our initial audit, Environment Canada would have developed and would be implementing such a strategy.

**The Department has developed a strategic framework**

**4.20** In 2005, Environment Canada began to implement its newly developed *Protected Areas Manual*. The manual provides a comprehensive set of national policies and procedures to guide the establishment and management of national wildlife areas and migratory bird sanctuaries. It also includes a strategic framework for the network and outlines specific activities required to properly manage protected areas, such as planning, issuing permits, monitoring, enforcement, habitat and wildlife management, and site maintenance (Exhibit 4.6). While enforcement is the responsibility of designated enforcement officers, managers of protected areas are responsible for the other activities.

**Exhibit 4.6 Environment Canada's Strategic Framework**

**Vision:** A comprehensive protected areas network that contributes to the conservation and protection of Canada's wildlife and the ecosystems of which they are a part.

**Strategic directions**

1. Establish program principles, policies, goals, and priorities.
2. Manage sites effectively.
3. Link and coordinate with other protected areas programs.
4. Protect the integrity of existing sites.
5. Raise public awareness.
6. Grow the network.

Source: Adapted from Environment Canada Protected Areas Manual, 2005.

**Gaps remain in the Department's strategic approach**

**4.21** While the Department has identified priorities for effective management, concrete action has been limited. In 2006, Environment Canada completed a management review to determine its level of compliance with the requirements specified in its manual. The review found significant gaps between specified requirements and the management of the network, particularly in the areas of enforcement, data management, and annual work planning.

**The Department has not balanced resources with expectations**

**4.22** In 2003, Environment Canada published *Contributing to Ecological Integrity: Environment Canada's Protected Areas*. This discussion paper indicated that the Department's capacity for managing protected areas has been in decline since 1977 and that the human and financial resources allocated to its protected areas program were not sufficient for the Department to meet all of its legislative and operational requirements.

**4.23** Environment Canada also recognizes the need to address other land management priorities. For example, sites are poorly marked and lack accurate boundary mapping. Land acquisition is incomplete. Site managers struggle to maintain infrastructure such as buildings, roads, bridges, and observation towers, to avoid public safety liabilities.

**4.24** In 2006, Environment Canada's preliminary management review estimated that addressing the most urgent needs of the network—public safety, enforcement, and ecological integrity—would require a significant increase in allocated resources. A more detailed management review is now under way to add precision to this estimate.



An observation tower

### Developing management plans for protected areas

**4.25** Ensuring that performance expectations are clearly linked to and balanced with the necessary authorities, skills, and resources is essential for effective management and accountability. Environment Canada has not yet balanced its expectations for the protected areas network with the necessary human and financial resources to deliver on them.

**4.26** Good management plans are needed to guide the achievement of specific goals and objectives. Good management plans are updated periodically, as planned action is completed, as corrective measures are identified, or as priorities change and new issues emerge. In the absence of such plans, it is difficult to effectively manage or assess progress.

**4.27** In 2000, Environment Canada made a commitment to develop and implement management plans for all of its protected areas. In 2001, we observed that most of the management plans for protected areas in the Great Lakes and St. Lawrence River basin had not been updated since the early- to mid-1980s.

**4.28** The Department's *Protected Areas Manual* includes a commitment to develop management plans and provides a template for doing so. According to the manual, plans are to be created when a protected area is established, and reviewed after the first five years and every 10 years thereafter.

**4.29** In this follow-up audit, we expected that Environment Canada would have developed and would be implementing management plans for its protected areas.

#### Management plans do not meet the Department's guidelines

**4.30** Although management plans have been developed for most national wildlife areas, they have been developed for only a limited number of migratory bird sanctuaries, and the majority of existing plans have not been updated since the 1980s (Exhibit 4.7).

**Exhibit 4.7** Management plans for most protected areas are either lacking or out of date

Designation	Total protected areas	Protected areas with management plan	Average date of management plans
Migratory bird sanctuaries	92	16	1989
National wildlife areas	51	47	1987



Confederation Bridge, Cape Jourimain National Wildlife Area

**4.31** According to Environment Canada, the impact of missing and outdated management plans is negligible for sites under limited stress, such as many of those located in remote areas. However, Department officials also identified numerous protected areas where there is a need to update management plans in order to more effectively direct the use of resources, the management of permits, communications, and enforcement. For example, located at the New Brunswick end of the Confederation Bridge, the Cape Jourimain National Wildlife Area contains an interpretation centre that receives thousands of visitors each year. The management plan for this protected area was last updated in 1994, three years before the bridge was built, and seven years before the interpretation centre was completed.

**4.32** In its 2006 management review, Environment Canada found that it had met the requirements of the *Protected Areas Manual* for management plans, even though it recognized that these plans need to be updated. No other requirement of the manual included in the review was being achieved. Given that the manual’s requirements are not yet being fully implemented, we conclude that the Department has made unsatisfactory progress in developing and implementing a strategic approach to management (Exhibit 4.8).

**Exhibit 4.8 Progress in addressing our recommendation on a strategic approach to federal protected areas is unsatisfactory**

Recommendation	Progress
Environment Canada should prepare a strategy for effectively managing national wildlife areas and migratory bird sanctuaries in the basin. (2001 Report of the Commissioner of the Environment and Sustainable Development, Chapter 1, section 5.1.25)	Unsatisfactory

**Satisfactory**—Progress is satisfactory, given the significance and complexity of the issue, and the time that has elapsed since the recommendation was made.

**Unsatisfactory**—Progress is unsatisfactory, given the significance and complexity of the issue, and the time that has elapsed since the recommendation was made.

**Enforcing legislation and regulations**

**4.33** The federal government has legislation and regulations intended to safeguard Environment Canada’s protected areas, prohibiting activities that could be harmful to species and their habitat in national wildlife areas and that could disturb migratory birds in a migratory bird sanctuary. Enforcement of these regulations is critical to the effective management of protected areas.

**4.34** Environment Canada is responsible for enforcing all federal wildlife legislation, including the *Canada Wildlife Act*, *Migratory Birds Convention Act*, and *Species at Risk Act*. Designated

enforcement officers work cooperatively with managers of protected areas, and with other federal and provincial partners, to identify enforcement priorities.

### **The Department does not sufficiently enforce its regulations**

**4.35** In 2001, we observed that Environment Canada did not sufficiently enforce its regulations under the *Canada Wildlife Act* or the *Migratory Birds Convention Act* that pertain to national wildlife areas and migratory bird sanctuaries.

**4.36** In this follow-up audit, we expected Environment Canada to be effectively enforcing the legislation and regulations across the entire protected areas network. We found that most areas in the network are not regularly patrolled or inspected. For example, while Wellers Bay National Wildlife Area has been identified as an enforcement priority in the Ontario Region due to the presence of unexploded munitions, it receives only five to six patrols per year. Despite posted warnings, local citizens make much illegal use of this area for camping and recreation. Other examples of enforcement problems identified by the Department include

- harmful uses by members of the public, such as trespassing, camping, and operating motorized vehicles and watercraft;
- illegal development and commercial exploitation, such as cattle grazing and wood harvesting;
- illegal trail and road building;
- illegal waste disposal; and
- poaching and live wildlife trafficking.

**4.37** Enforcement problems are only sporadically addressed. Since 2002, Environment Canada has recorded limited **inspections** or **investigations** in response to violations under the *Canada Wildlife Act* or the *Migratory Bird Sanctuary Regulations*. Based on their experience, Department officials believe that a significant number of violations occur without any enforcement action being taken. Nonetheless, there is no systematic collection of **intelligence** to help target enforcement activity.

**Inspection** aims to ensure that acts and regulations are respected.

**Investigation** aims to gather evidence and information regarding alleged offences.

**Intelligence** aims to gather information to direct and support inspections and investigations.

### **Capacity and access are key barriers to effective enforcement**

**4.38** Our audit found two key barriers to effective enforcement: access and capacity. Wildlife enforcement officers are concentrated in urban areas. They visit some locations only once every 10 years. With few

exceptions, managers of protected areas are also infrequently on site and do not have the authority to enforce regulations. Although Environment Canada is piloting the use of satellite technology to monitor wildlife habitat and build intelligence in remote locations, it is currently difficult for enforcement officers to detect violations or rapidly respond to illegal activities in those areas.

**4.39** A 2006 review of wildlife enforcement by Environment Canada found that the Department has allocated insufficient enforcement staff to visit all protected areas on a regular basis or to ensure a minimal level of compliance with regulations. In its 2007 Budget, the federal government increased funding for environmental enforcement. As a result, Environment Canada expects to hire close to 40 additional wildlife officers. However, the Department has estimated it needs at least double that increase to meet its legislated responsibilities.

**4.40** Based on our examination, we conclude that Environment Canada is still not in a position to sufficiently enforce its regulations pertaining to national wildlife areas and migratory bird sanctuaries.

### Monitoring and reporting on protected areas

**4.41** Effective management requires that results be monitored and reported in relation to performance expectations. It is important to periodically monitor the state and management of protected areas in order to identify trends, review performance expectations, and take necessary corrective action to maintain ecological integrity.

#### **The Department's monitoring of protected areas is limited**

**4.42** In 2001, we observed that Environment Canada had undertaken limited scientific research in its protected areas. The Department did not have comprehensive, up-to-date inventories of species living in national wildlife areas or in migratory bird sanctuaries, including species at risk. In this audit, we expected Environment Canada to have improved its monitoring of protected areas.

**4.43** Environment Canada's *Protected Areas Manual* identifies monitoring and inventories as key management requirements. While inventories have been initiated to identify species at risk, Environment Canada still undertakes limited monitoring. Consequently, the Department lacks detailed knowledge of the species and habitats in most protected areas.



Cap Tourmente National Wildlife Area

**4.44** For example, since 2002, Environment Canada has summarized existing knowledge of each of its national wildlife areas in the Quebec Region. However, information remains incomplete because sites in the region have not been adequately inventoried since they were established in the 1970s. Cap Tourmente National Wildlife Area is Quebec's best-known site, attracting more than 50,000 visitors each year. Although this site's migratory birds are monitored, knowledge of the area's plants, mammals, and fish is still incomplete.

#### **Reporting to Parliament and the public is deficient**

**4.45** In 2001, we recommended that Environment Canada report regularly to the public on the state and management of its national wildlife areas and migratory bird sanctuaries. In this follow-up audit, we expected that Environment Canada would be reporting regularly on the state and management of its network.

**4.46** Environment Canada's *Protected Areas Manual* includes a policy mandating both annual work planning and reporting. Neither is being carried out systematically. The Department has not established any performance expectations against which progress can be assessed, and no comprehensive annual report has as yet been released.

**4.47** Through its central and regional websites, Environment Canada provides basic information to Canadians on its protected areas network. However, given the lack of performance expectations and monitoring, we are concerned that Parliament and Canadians are not receiving information about the state and management of protected areas. Progress on our recommendation is unsatisfactory (Exhibit 4.9).

**4.48** In 2001, we found that there were several weaknesses in Environment Canada's management of national wildlife areas and migratory bird sanctuaries. In this follow-up audit, we found that the action the Department has taken to address these weaknesses, or to improve its management of protected areas, is limited (Exhibit 4.9). As a result, the ecological integrity of these protected areas is at risk.

**Exhibit 4.9 Progress in addressing our recommendation and findings on federal protected areas is unsatisfactory**

Recommendation	Progress
Environment Canada should report regularly to the public on the state of national wildlife areas and migratory bird sanctuaries in the basin. Areas for reporting would include the state of their environmental health, public access and use, scientific research, and enforcement activities. (2001 Report of the Commissioner of the Environment and Sustainable Development, Chapter 1, section 5.1.26)	Unsatisfactory
Findings	Progress
<ul style="list-style-type: none"> <li>• Management plans are outdated.</li> <li>• Comprehensive, up-to-date inventories of species are lacking.</li> <li>• Monitoring and reporting of public access and use is limited.</li> <li>• Scientific research undertaken by the federal government is limited.</li> <li>• Regulations are not sufficiently enforced.</li> <li>• Environment Canada lacks the human and financial resources to manage protected areas effectively.</li> </ul> (2001 Report of the Commissioner of the Environment and Sustainable Development, Chapter 1, see sections 5.3.11 and 5.3.12)	Unsatisfactory

**Satisfactory**—Progress is satisfactory, given the significance and complexity of the issue, and the time that has elapsed since the recommendation and findings were made.

**Unsatisfactory**—Progress is unsatisfactory, given the significance and complexity of the issue, and the time that has elapsed since the recommendation and findings were made.

**4.49 Recommendation.** Environment Canada should systematically assess its national wildlife areas and migratory bird sanctuaries to determine whether they are meeting the Department’s criteria for protected areas and fulfilling their intended purpose. Based on its assessments, the Department should undertake timely action to maintain, restore, or delist sites as appropriate.

**Environment Canada’s response.** Agreed. Environment Canada continues to implement measures to manage national wildlife areas and migratory bird sanctuaries. The Department has developed a strategic framework for the management of its network of 143 protected areas, and an operations manual that establishes policies and procedures for the effective management of these areas.

Environment Canada is currently undertaking a review of its protected areas in conserving wildlife and protecting migratory birds, their nests, eggs, and habitat. This review, to be completed in the summer of 2008, will also include consideration of more effective means of monitoring

and reporting on the state of these areas, and will help to inform necessary actions, contingent on available resources. An action plan with timelines will then be prepared during 2008–09, which will provide guidance for example on priorities for updated site management plans, site improvements, and delisting. In addition, Environment Canada will also update five site management plans during 2008–09. Full implementation of the action plan will be contingent upon available resources.

## Conclusion

**4.50** Environment Canada has made unsatisfactory progress in addressing our previous recommendations and observations on federal protected areas, both for the Great Lakes and St. Lawrence River basin and from a national perspective.

**4.51** Although Environment Canada has prepared a manual for managing its protected areas, including a strategic framework, most of the elements have not been implemented. Most protected areas management plans are badly outdated. The expected conservation results are not monitored or reported.

**4.52** Environment Canada does not sufficiently enforce its regulations under the *Canada Wildlife Act* or the *Migratory Birds Convention Act* as they pertain to national wildlife areas and migratory bird sanctuaries. Monitoring of public access to and use of protected areas is limited. Scientific monitoring and research is also limited, and there is insufficient scientific data available to quantify trends and risks to the ecological integrity of these sites. Reliable information available to Parliament or Canadians on the state and management of these protected areas is therefore limited.

**4.53** Environment Canada's national wildlife areas and migratory bird sanctuaries form an extensive network that is intended to protect significant habitat and species. However, expectations for conservation are not balanced with resources. By its own analyses, Environment Canada has not allocated sufficient human or financial resources to effectively manage Canada's protected areas.

**4.54** Environment Canada recognizes that the designation of an area as protected is not the end of the job, but the beginning. Canada's protected areas network may continue to deteriorate unless the Department takes concerted action to effectively manage sites and address threats to their ecological integrity.

## About the Audit

### Objective

The objective of this audit was to determine whether Environment Canada has made satisfactory progress in implementing recommendations and observations related to national wildlife areas and migratory bird sanctuaries that were made in Chapter 1 of our 2001 Report on the Great Lakes and St. Lawrence River Basin. We examined action taken by the Department to assess, monitor, maintain, and report on a national network of federally protected areas.

### Scope and approach

Our audit covered the measures that Environment Canada has taken following the observations and recommendations on protected areas made in our 2001 audit, with a focus on two categories of protected area for which the Department has lead responsibility: national wildlife areas and migratory bird sanctuaries. Given that protected areas are managed as a national network, the scope of our audit included all sites in Canada.

In carrying out the audit, we interviewed Department officials and relevant stakeholders, and reviewed Department files, reports, and other supporting documentation. We also visited a sample of 20 protected areas from across Canada. We selected our sample to reflect the diversity of protected areas managed by Environment Canada, and to better understand the Department's conservation responsibilities for these sites.

Our audit did not follow up on recommendations made in our audit of Ecological Integrity in Canada's National Parks in the 2005 CESD Report, Chapter 2. While national parks are federally protected areas, they are not reserved for wildlife. In addition, insufficient time has lapsed for Parks Canada to implement those recommendations.

### Criteria

The criteria for this audit were derived from the observations and recommendations related to protected areas in our 2001 Report on the Great Lakes and St. Lawrence River Basin. For this audit, we expected that for its protected areas, Environment Canada would be

- applying a strategic approach to management,
- developing and implementing management plans,
- effectively enforcing relevant legislation and regulations, and
- regularly monitoring and reporting on the state of its sites.

Progress on recommendations was assessed using the Office of the Auditor General's Guide to Assess Entity Progress.

**Audit work completed**

Audit work for this chapter was substantially completed on 9 July 2007.

**Audit team**

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## Appendix List of recommendations

The following recommendation is found in Chapter 4. The number in front of the recommendation indicates the paragraph number where it appears in the chapter. The numbers in parentheses indicate the paragraph numbers where the topic is discussed.

Recommendation	Response
<b>Applying a strategic approach</b>	
<p><b>4.49</b> Environment Canada should systematically assess its national wildlife areas and migratory bird sanctuaries to determine whether they are meeting the Department’s criteria for protected areas and fulfilling their intended purpose. Based on its assessments, the Department should undertake timely action to maintain, restore, or delist sites as appropriate. (4.19–4.48)</p>	<p>Agreed. Environment Canada continues to implement measures to manage national wildlife areas and migratory bird sanctuaries. The Department has developed a strategic framework for the management of its network of 143 protected areas, and an operations manual that establishes policies and procedures for the effective management of these areas.</p> <p>Environment Canada is currently undertaking a review of its protected areas in conserving wildlife and protecting migratory birds, their nests, eggs, and habitat. This review, to be completed in the summer of 2008, will also include consideration of more effective means of monitoring and reporting on the state of these areas, and will help to inform necessary actions, contingent on available resources. An action plan with timelines will then be prepared during 2008–09, which will provide guidance for example on priorities for updated site management plans, site improvements, and delisting. In addition, Environment Canada will also update five site management plans during 2008–09. Full implementation of the action plan will be contingent upon available resources.</p>

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