August 21, 2014

Honourable Brad Duguid
Minister of Economic Development, Employment and Infrastructure
8th Floor, Hearst Block
900 Bay Street
Toronto, Ontario M7A 2E1

By email: bduguid.mpp@liberal.ola.org

Re: CPAWS request to not transfer lands to the federal government for Rouge National Urban Park until problems with draft federal legislation for the park are resolved

Dear Minister Duguid:

We are writing to express our serious concern that the draft federal legislation to create and manage the proposed Rouge National Urban Park, Bill C-40, does not provide adequate protection for the remarkable ecological values of the Rouge. In fact it is our view that the standard of protection in the Rouge could be lowered from its current status if the Rouge National Urban Park were to be established under this Bill. As a result we are requesting that, until this problem is resolved, Ontario not transfer any lands to the federal government for the purposes of creating the Rouge National Urban Park.

The Memorandum of Agreement signed between Parks Canada and the Ontario government for the Rouge National Urban Park requires that written policies “meet or exceed provincial policies regarding the transferred lands…” Bill C-40 does not meet this test. The provincial policies for the Rouge Park and adjacent lands in the Green Belt and Oak Ridges Moraine clearly focus on ecosystem protection as the priority for management, and this is not the case in Bill C-40.

The biggest problem with Bill C-40 is that it does not clearly prioritize nature conservation as the primary purpose of the park, or the top priority for park management. In fact it only requires that the Minister take into consideration the protection of natural ecosystems and cultural landscapes and the maintenance of its native wildlife and of the health of those ecosystems” (emphasis added) in the management of the park. The prioritization of nature conservation is an absolute necessity if the park is to protect the significant natural values of the Rouge for future generations to enjoy. Prioritizing nature conservation is consistent with existing federal and Ontario parks legislation, and with the international definition of a protected area.
Given the significant shortcomings in the proposed federal Rouge legislation, we ask that you publicly commit to ensuring no provincial lands are transferred to the federal government for the purposes of creating the Rouge National Urban Park until these issues are resolved.

We would be pleased to discuss this with you in further detail.

Sincerely,

Janet L Sumner
Executive Director
CPAWS Wildlands League

Cc. Honourable Glen Murray, Minister of the Environment and Climate Change
Honourable Bill Mauro, Minister of Natural Resources and Forestry
Honourable Jim Bradley, Chair of Cabinet