

The Honourable Jonathan Wilkinson
Minister of the Environment and Climate Change
House of Commons
Ottawa Ontario
K1A 0A6

May 11, 2020

Dear Mr. Wilkinson

Subject: Rideau Canal National Historic Site Management Plan

I am writing you to register my dissatisfaction with the draft management plan for the Rideau Canal, a national historic site and world heritage site. I have already written at length to Parks Canada with my detailed comments so I will not repeat them here. I will however make a few points so that you are aware of the serious shortcomings of this plan.

1. This document can not be considered as a management plan. It does not conform to any internationally accepted standards and norms for protected heritage area management plans. Furthermore, the draft plan does not adhere to the requirements and guidance for world heritage site management plans as approved by the world heritage committee. It is quite possible that the world heritage centre will reject the plan and require Parks Canada to start over with due regard to their requirements for a comprehensive management plan. Should this happen, it would constitute a severe embarrassment to the Government of Canada and Parks Canada which in the past has been widely regarded as an international leader in heritage conservation.
2. The draft plan does not provide policies and actions to ensure that UNESCO's requirement for the protection of the outstanding universal values of the site are met. This is in stark contrast to other world heritage sites management plans which I have examined where the primary focus of these plans is on the protection and presentation of the world heritage site. Parks Canada has an obligation under the world heritage convention to ensure that the outstanding universal values of the site are fully protected and presented to the public. This draft plan does not meet that requirement.
3. This document does not contain a policy framework for the actual management of the site. For example, there are no policy statements articulating Parks Canada's legitimate interests in the development of private lands adjacent to the Canal or the preparation of municipal land use plans. This is a significant shortcoming as the development and use of lands adjacent to the Canal can affect the integrity of the world heritage site buffer zone

and the visual setting of the Canal. Without a comprehensive policy framework to address land use and development matters among many other issues, the public will not know how Parks Canada will respond in a consistent manner. This is a matter of public accountability, and transparent management.

4. The failure of this management plan stems from the Parks Canada Agency Act. While the Act goes into some detail to lay out the mandate of the organization and other organizational requirements, it does not define a management plan. A management plan is the most important document the Agency can produce as it should describe in detail the policies and actions in place to achieve commemorative and ecological integrity. Since the Act does not define a management plan, Parks Canada can produce whatever it wants and call it a management plan. In 2013/14 they significantly changed the format of the plan, stripping it down, removing the required policies and contextual information that would make it an actual management plan. This has resulted in the draft Rideau Canal management plan which, as I stated earlier, is not a management plan by any definition. I have addressed this matter at some length in my critique of the Parks Canada management planning system. It can be found at :
<http://www.rideaufriends.com/documents/stevens-parks-planning-system-critique.pdf>
5. Canadians have entrusted Parks Canada with the task of managing the system of national parks, national historic sites and historic canals on their behalf for well over 100 years. This trust is based on the implicit understanding that sound management will ensure that that these places will endure for the benefit of all Canadians. Management plans form the basis for that trust. Canadians have a right to management plans that are comprehensive with policies and actions to protect these places in perpetuity. This is currently not the case. To remedy this situation I would request that you amend the Parks Canada Agency Act in consultation with stakeholders to include a definition of a management plan consistent with international standards and norms and requirements of the World Heritage Committee. Undertaking this simple amendment will result in the production of management plans that Canadians can understand and support.

Yours Sincerely

Manuel Stevens