

Written Submission on
Draft Biodiversity and Ecosystem Health Framework
By Living Lakes Canada
January 2024



Thank you for the opportunity to comment on the Draft BC Biodiversity and Ecosystem Health Framework.

About Living Lakes Canada

Living Lakes Canada (<http://www.livinglakescanada.ca>) is an award-winning charitable water stewardship NGO with more than 20 years of experience working with community groups to protect freshwater.

- Founded and headquartered in B.C.'s Columbia Basin, we deliver numerous programs across the Columbia Basin region, as well as across the province of B.C. and Canada.
- Our science-based programs are aligned with Provincial and Federal monitoring protocols and range from: groundwater, lake, stream and wetland monitoring, to foreshore health assessments, biomonitoring for aquatic assessment and restoration, and water database development and management.
- We also deliver water monitoring training courses to support community-based stewardship efforts. Over the decades, we have delivered numerous educational programs targeting both youth and adults to promote water literacy and encourage a water conservation ethic.
- We have been the recipient of numerous awards including (most recently): the BC Achievement Foundation Community Award & Mitchell Award of Distinction (2023), the Kootenay Conservation Program Conservation Leadership Award (2023), the North American Lake Management Society Appreciation Award for Advancements in Lake Management Technologies (2023), and the Canadian Open Data Society Open Data Quality Award (2023).
- Our core staff work with our Board of Directors and an Advisory team composed of experts in different fields.
- We partner with hundreds of organizations from industry, First Nations, academia, government technology and scientific consultants, water stewardship groups and other non-profit societies both nationally and internationally.
- We're a member of the BC Watershed Security Coalition and a Steering Committee member of the Canadian Coalition for Healthy Waters. We're also a member of the Columbia Wetlands Stewardship Partners and the Kootenay Conservation Program.

Recommendations

We commend the release of the Draft BC Biodiversity and Ecosystem Health Framework and the proposed shift towards ecosystem-based management. As an organization with a long history of stewarding and advocating for the protection of freshwater ecosystems, we are encouraged by the systematic changes that the framework outlines and are hopeful it will result in the long-anticipated critical and transformative changes needed to protect biodiversity and ecosystem health and freshwater security.

Ultimately, curbing biodiversity loss in B.C. will take more than prioritizing ecosystem health. Living Lakes Canada strongly advocates for an immediate cessation to the logging of old growth forest across B.C. Old growth forests are essential, non-renewable, and rapidly disappearing ecosystems that biodiversity depends on. In the time it takes for new biodiversity-related laws to be passed in B.C., we continue to lose more of these invaluable ecosystems to industry and external stakeholder interests. In general, we are deeply concerned with the rate of clear cut logging occurring in our B.C. Interior watersheds, where drought impacts and biodiversity losses are unprecedented during this predicted climate crisis era, impacting both the viability of ecosystem services and watershed security. A moratorium on clear cutting within watersheds needs immediate implementation while simultaneously addressing and making more relevant dated forest policy such as inadequate buffer zones given the climate impacts to watershed security. The cumulative impacts on our watersheds can be lessened by sound land use practices. The NGO community has advocated for the earnest protection of biodiversity in keeping with UN Sustainable Development Goals over the past three decades, yet our options to preserve biodiversity in British Columbia continue to be eroded. We urge you to not allow for the further diminishment of our precious water-based ecosystems and wetlands. For example, the Columbia River Wetlands in southeastern B.C. have been assigned RAMSAR status, which means they are wetlands of international significance. These wetlands have 98 unharmonized management plans attributed to them, with few applied policies. Clearcut logging is slated in parts of the surrounding land catchment areas while all levels of government simultaneously spend enormous resources for restoration and to keep water in these wetlands, which act as a huge floodplain buffer for surrounding communities.

Our following recommendations highlight gaps in the draft framework that our organization would like to see addressed and included in the final Framework for the benefit of all ecosystems, human communities and economies in B.C. now and into the future.

#4: Foundation (page 7)

- That Indigenous-led stewardship efforts are at the forefront of the Framework as part of the province's commitment to advance the United Nations Declaration on the Rights of Indigenous Peoples and the requirements of the Declaration Act.
- That Indigenous Protected and Conserved Areas (IPCAs) or other specific Indigenous-led stewardship efforts are highlighted and supported, with actionable steps detailed to move towards and accomplish these objectives.
- That the foundation of the Framework be informed by Indigenous law and expertise from Knowledge keepers. There should be mechanisms to ensure that Indigenous laws, Knowledge, and values are respected and upheld throughout the development, finalization, and implementation of the framework.

#5: Actions - Pillar 1 (page 8)

- Office of Biodiversity and Ecosystem Health:

- The establishment of this office must fit in with the timeline for Framework implementation.
- The office must be guided by Indigenous Knowledge and independent Western science bodies to provide objective advice and support.
- The office must have autonomy and authority across provincial departments so as to avoid setbacks and internal gridlocks (i.e. must be set up with the necessary powers to give it “teeth” and avoid becoming symbolic only).
- New legislation:
 - The development and implementation of timely new legislation will be crucial to the tangible and transformative change that is possible with this Framework.
 - That new legislation first and foremost must be truly co-developed with First Nations and be consistent with principles outlined in UNDRIP.
 - Questions to be answered include:
 - What will co-development of legislation between the province and First Nations look like?
 - Will it truly be a collaborative process that is grounded in Indigenous laws, Knowledge, and values?
 - Many communities have concerns related to the health of their local watershed that are often overlooked. An enhanced and timely community consultation process should be developed and implemented.
- Ecosystem health and biodiversity objectives and standards:
 - Questions to be answered are:
 - How will these objectives be developed?
 - What goal(s) are these objectives and standards intended to accomplish?
 - First Nations and the Province should not just work together to adjust the objectives and standards, but should work together to develop them from the ground up.
 - Indigenous Protected Conservation Areas (IPCAs) and other Indigenous-led land use planning guidelines should be supported and upheld.

#5: Actions - Pillar 2 (page 9)

- First Nations are not mentioned in the whole-of-society approach. Inclusion of First Nations must be prioritized and specified, with details included on how this will be accomplished.
- How will the Framework support Indigenous data sovereignty? For example, will data collection, management, and sharing respect and uphold the principles of OCAP®?

#5: Actions - Pillar 3 (page 9)

- Immediate actions are required at the time of the final Framework’s release. This should include a comprehensive plan for cooperation with First Nations, the establishment of the

Office of Biodiversity and Ecosystem Health, and a legal order to prioritize biodiversity and ecosystem health across provincial sectors.

In closing, B.C.'s current legal framework prioritizes industry/extraction. For the most part, biodiversity protection is seen as a "constraint" on industry and development. **A shift in the government's mindset to a biodiversity focus is an unprecedented commitment, but needs to be implemented well in order to be credible, upheld, and effective.** Overall, the Framework needs more details to understand how high-level commitments will be implemented on the ground, with measurable objectives and timelines.

Thank you again for the opportunity to engage and comment on the draft report. We are enthusiastically awaiting the final Framework and look forward to future opportunities for engagement during this process.

For any questions regarding this document, please contact:

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