

April 14, 2023

**Feedback from Canadian Parks and Wilderness Society - British Columbia Chapter (CPAWS-BC)  
on the British Columbia Coastal Marine Strategy Policy Intentions Paper**

Sent by email: LWRS.CoastMarine@gov.bc.ca

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The Canadian Parks and Wilderness Society – British Columbia Chapter (CPAWS-BC) advocates for the creation of large, connected, and well-managed protected areas where biodiversity can thrive and communities can live sustainably, allowing future generations to do the same. Since 2019, we have co-led Blueprint for the Coast – a collaborative campaign founded by CPAWS-BC and West Coast Environmental Law, which calls to implement a coast-wide marine strategy and accompanying coastal zone law in British Columbia.

We would like to take this opportunity to thank the Government of British Columbia for listening to those concerned for the future of the coast, and congratulate the province and coastal First Nations on the co-drafting of the Coastal Marine Strategy Policy Intentions Paper. This process is a new approach to policy formation that includes co-development, and outlines a roadmap towards conserving and restoring coastal habitats, enhancing climate resilience, advancing reconciliation, supporting community well-being, and incorporating holistic marine use plans.

While this is a promising start, we outline four recommendations to ensure the intentions listed in the paper result in an effective Coastal Marine Strategy.

**1. Prioritize the long-term, effective protection of important coastal and marine habitats.**

Areas of high ecological integrity are inherently biodiverse<sup>1</sup>, resilient, and can buffer the impacts of climate change<sup>2</sup>; therefore, it is important to protect these areas with well-monitored and strongly enforced sites. Improving existing sites and establishing additional conservation areas, with ecological monitoring and restoration practices, will serve as a catalyst to achieve a wide array of conservation goals including revitalizing populations of life-giving forage fish and creating refuges for species at risk, like southern resident killer whales.

The Coastal Marine Strategy can further ensure marine protection by complementing the work of the Marine Planning Partnership (MaPP) across the Northern Shelf Bioregion. This process contributed to developing Canada's first marine protected area (MPA) network in partnership with

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<sup>1</sup> Worm, B., Barbier, E. B., Beaumont, N., Duffy, J. E., Folke, C., Halpern, B. S., ... & Watson, R. (2006). Impacts of biodiversity loss on ocean ecosystem services. *science*, 314(5800), 787-790.

<sup>2</sup> Roberts, C. M., O'Leary, B. C., McCauley, D. J., Cury, P. M., Duarte, C. M., Lubchenco, J., ... & Castilla, J. C. (2017). Marine reserves can mitigate and promote adaptation to climate change. *Proceedings of the National Academy of Sciences*, 114(24), 6167-6175.

First Nations and the federal government. MaPP can serve as a framework for future collaboration with Indigenous Nations on marine planning, such as identifying protection management zones across the south coast region.

Another priority underneath this recommendation is to strengthen provincial marine conservation sites by integrating federal MPA standards and Indigenous-led conservation, thereby improving the efficacy of these areas to safeguard British Columbia's marine ecosystems.

Lastly, we strongly advise that seabed mining, as mentioned in C-4-8, should not be permitted in British Columbia. This activity would destroy sensitive habitats and greatly reduce the health and resilience of marine ecosystems.

We prioritize the following intentions to meet this recommendation: A-1, A-2, A-4, A-5, B-4, B-5, C-4

## **2. Prioritize the establishment of Indigenous Protected and Conserved Areas (IPCAs).**

Indigenous-led conservation has positive effects on biodiversity and facilitates the integration of traditional knowledge into marine management<sup>3</sup>. In prioritizing IPCAs, the province would simultaneously support a holistic approach to protect coastal habitats and implement a practical, yet meaningful way to uphold the UNDRIP. An example of such work is the Government of Canada and the Government of British Columbia's partnership with the Mamalilikulla First Nation to create a marine refuge for the Gwaxdlala/Nalaxdlala IPCA. This approach shows how collaboration can both protect biodiversity and demonstrate a commitment to reconciliation. Additionally, we are pleased that the government of British Columbia will explore innovative protected area models, including IPCAs, and that the establishment, planning, and management of MPAs will take place through a lens of Indigenous rights, advancing the UNDRIP.

We prioritize the following intentions to meet this recommendation: C-1, C-3, D-1, E-3

## **3. Comprehensive coastal zone legislation must be implemented.**

In the absence of a coastal law, the strategy is vulnerable to an inevitable change in the political landscape. Without an accompanying law, the strategy would likely fail to achieve the items listed in the Intentions Paper, preventing its result in meaningful change. A commitment to legal reforms will strengthen the delivery of the Coastal Marine Strategy and ensure the province has the ability to manage coastal ecosystems sufficiently, now and into the future.

We prioritize the following intention to meet this recommendation: C-4

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<sup>3</sup> Tran, T. C., Ban, N. C., & Bhattacharyya, J. (2020). A review of successes, challenges, and lessons from Indigenous protected and conserved areas. *Biological Conservation*, 241, 108271.

**4. Commitments to the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) must be upheld throughout all strategy development and implementation phases.**

We are pleased that the Government of British Columbia has co-developed the Intentions Paper with First Nations and has been mindful to include Indigenous perspectives within the Coastal Marine Strategy. Additionally, we applaud the province's acknowledgment of the institutional and systemic racism placed upon Indigenous Peoples, along with the commitment to raise awareness of Indigenous rights, management authorities, and jurisdictions related to managing marine values. It is crucial that these commitments are fulfilled to the satisfaction of Indigenous Peoples. This engagement will ensure the strategy is meaningfully co-developed – representing the many viewpoints of coastal First Nations and addressing the issues most pressing to their communities.

Collaborative relationships with First Nations must continue beyond the drafting process, resulting in future co-management. One example is the initiative to give Kitsoo Xai'xais, and Nuxalk First Nations shared compliance and enforcement responsibilities within provincial protected areas in both Nations' territories. This approach should be expanded, including federally, as Coastal Guardians are the eyes and ears on the water. This not only ensures coastal ecosystems are protected, but recognizes Nations' rightful role in the stewardship of their own lands and waters.

We prioritize the following intentions to meet this recommendation: C-1, C-3, D-1, E-3, F-2

CPAWS-BC supports the Government of British Columbia in the co-development of a Coastal Marine Strategy and has provided these recommendations to ensure its long-term success. We need a strategy informed by meaningful engagement with coastal First Nations, communities, and non-governmental organizations.

We look forward to continuing our engagement on this initiative and to supporting this important work.

Sincerely,

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