

World Heritage Centre, UNESCO  
Attn: Isabelle Anatole-Gabriel, Chief of Unit  
Europe and North America Unit  
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France

Sent via email to: i.anatole-gabriel@unesco.org

April 12, 2019

**Re: Upcoming 43<sup>rd</sup> World Heritage Committee meeting and inscription of Wood Buffalo National Park as a World Heritage Site in Danger**

Dear Dr. Anatole-Gabriel,

We write to the World Heritage Committee (“the Committee”) as stakeholders invested in improving the ecological health of Wood Buffalo National Park (“the Park”), and protecting Indigenous cultural and spiritual connections to the area. We have particular interest in effective management of the Park as it is a part of the world’s largest piece of intact protected boreal forest. Its boundaries include the largest boreal inland delta—the Peace-Athabasca Delta (“the Delta”)—and contain abundant important habitat for a wide variety of fauna and wildlife, especially the endangered Whooping Crane and the largest free-roaming herd of Wood Bison.

Since the Mikisew Cree First Nation submitted a petition to list the Park as a World Heritage Site In Danger to the Committee in 2014, we have continued to monitor and publicly engage with the initiatives Canada has undertaken as requested by the Committee, and engaged with an application for a new oil sands mine, to be located near the southern border of the Park (Teck Frontier Mine). We were pleased to see collaborative work among the Federal, provincial, territorial, and Indigenous governments in the development of Canada’s Action Plan (“the Plan”) to meet the Committee’s requests. However, we are concerned about the probability of the Plan’s full implementation and its inability to address cumulative impacts from human activities.

**The Action Plan does not adequately address cumulative effects from industrial human activities.**

The Reactive Monitoring Mission (“the Mission”) provided 17 recommendations to guide an Action Plan for the Park, however, we feel many of the recommendations are not fully addressed. In particular, the Plan does not strongly manage the cumulative impacts from industrial developments outside of the Park, nor does it address broad-scale effects of climate change; both of which will have negative effects on the quality and quantity of water entering the Delta. The Plan heavily relies on existing legal frameworks and assessment processes, which were identified in the Mission as insufficient to address cumulative impacts on the Delta. The current regulatory processes are not capable of identifying cumulative thresholds for disturbances of upstream freshwaters. Based on these inadequate frameworks, Canada will continue to approve industrial developments that under-estimate impacts on the Delta.

This concern is exemplified by the dismissal of Recommendation #4, which calls for an environmental and social impact assessment of the approved Site C dam. The Site C environmental assessment was completed three years prior to the Mission Report and fails to consider cumulative effects on the Delta. Canada remains firm on relying on the existing

assessment, despite its inadequacies. Moreover, Recommendation #5 calls for an assessment of how the Teck Frontier open-pit oil sands mine, which is currently under consideration by regulatory bodies, will affect the Park. This proposed mine would be the largest oil sands mine in Canada's history and would be the closest oil sands mine to the Park, just 30-km south of the Park's boundaries. The Joint Review Panel (JRP) for this project broadened its scope to include impacts of the mine on the Park, and interveners at the hearing—including some of the organizations on this letter—raised concerns that the mine will further degrade several of the OUVs of the Park. A decision from the JRP is not expected until after the Committee meets this summer.

The declining trend in ecological health of the Delta is certain to continue if fundamental issues with regulatory processes are not addressed and the government continues to rely on existing frameworks and policies.

**We ask the Committee to consider that proposed management actions are not strong enough without commitments to implementation.**

Finally, we note that long-term funding continues to be of concern for the Park. With limited resources and a multitude of promises, there is uncertainty around the probability that these actions are fully implemented:

- Although Canada has committed \$27.5M for the Park over 5 years, the size and needs of the Park demand much more. Funding should match the ambitious commitments: partnering with Indigenous communities, increasing Parks Canada staffing, hiring Indigenous peoples, increasing capacity to monitor the Delta, Peace River and Athabasca River, and developing a Knowledge Hub for all data collected on the Delta. Without significant increases in funding, the implementation of these long-term actions and monitoring is unlikely.
- The allocation of the \$27.5M is not outlined in the Plan. We would like to see how a significant portion of these funds will be allocated toward incorporating Indigenous knowledge into the park management plans.
- The Integrated PAD Research and Monitoring program is an important step forward in partnering with Indigenous communities by integrating Indigenous knowledge and Western science to monitor the Delta. However, we are disappointed to see that funding will come from existing funding commitments to the Oil Sand Monitoring (OSM) program. We regret to see any further reductions in OSM's current capacity and insist that, instead, additional funding should be committed. If Canada's intentions are to fully partner with Indigenous communities, then governments must put forward the necessary funding for this work.
- Without legal agreements between the multiple jurisdictions in a time of potential political transition for Alberta and Canada, it will additionally remain a challenge to fully implement the actions proposed for the different provincial and federal agencies.

The Mission stated that “an absence of a major and timely response would constitute a case for recommending inscription of [Wood Buffalo National Park] to the list of World Heritage Sites in Danger”. Given the degradation of the Delta and short timelines described in the Plan, we consider a failure to complete *any* single action as an overall failure to initiate a “major and timely response”. The Committee should strongly consider that the threats to the Park are pervasive, ongoing, and require significant time and resources to tackle, demanding an upscaling of the resources needed to anticipate and combat impacts.

We believe that the objectives of the proposed Plan and the allotted funding are insufficient to tackle these threats and, therefore, urge the Committee to inscribe the Park to the list of World Heritage Sites in Danger. We request that the Committee hold Canada accountable for its Plan by anticipating an update at the 44<sup>th</sup> World Heritage Committee meeting in 2020 with key results from high-priority components of the Plan—timely successes that are unlikely without transparent timelines and adequately boosted funding. We will continue to monitor the implementation of the Plan in the Park and provide regular updates as to new developments.

Sincerely,



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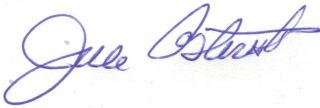


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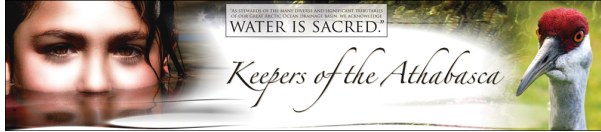


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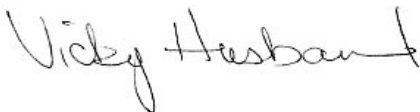
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Respecting Aboriginal Values and Environmental Needs



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