



August 30, 2011

The Honourable Terry Lake,  
Minister of Environment,  
Parliament Buildings,  
Victoria B.C.

Dear Mr. Lake,

**Re: Report of the British Columbia Task Force on Species at Risk, January 31 2011**

BC Nature appreciates the opportunity afforded us in the Fall of 2010 to comment on the terms of reference of the B.C. Task Force on Species at Risk, and now to provide comments on the Task Force's Report. We congratulate both the government for convening the Task Force, as well as the Task Force itself on the completion of a difficult assignment.

The Report contains many recommendations that we support, and the emphasis on ecosystems rather than single species in particular, pleases us. However, this and other recommendations are seriously weakened by two major shortcomings:

First, the Report fails to recommend strong new species-at-risk legislation. We find this deficiency very disturbing. We believe that there is a need for new and effective legislation based on using ecosystem management as the cornerstone of all land and resource management. The recommendation of the Task Force to patch together laws and regulations relating to wildlife in the various ministries responsible for the use and management of natural resources is inadequate. Certainly, the existing legislation needs to be reviewed as part of the process, but the goal of the process should be a strong new Act to protect the integrity of the province's ecosystems and the organisms that sustain them. Our provincial vision must be to restore threatened and endangered species and maintain currently healthy populations of wildlife and their habitat so that they do not become threatened in the future. The legislation must not only include strong protection for species at risk and their sustaining ecosystems, but also empower the responsible ministries to take the action necessary to ensure the development and implementation of conservation plans.

Second, the Report's emphasis on the need to balance the economy and the environment is consistently phrased in such a way that the economy subtly continues to have priority over the environment. This misplaced emphasis begins in the Report's Introduction, where in the first paragraph it states:

*Our challenge is to maintain prosperity and social harmony while also respecting our responsibilities to steward the land in a manner that will sustain those special natural values on which we depend.....*

The Task Force was surely established to come up with recommendations to prevent the extinction of species, not just to “respect” the need to protect BC’s natural values (and what does “special” mean?) while maintaining all the gadgetry now considered to be essential elements of “prosperity”. Of course the government also has the responsibility to work toward a healthy economy, and the Task Force needed to recognize this. However, by expressing its challenge in the terms quoted above, we get off on the wrong foot. Human economic wellbeing depends upon the health of the biosphere, and biologists and naturalists, as well as a growing number of economists, recognize that for our civilization to survive, the prevailing emphasis on economic growth must shift to one of ecological and social sustainability. According to the 2010 Living Planet Report of the Global Footprint Network, we now use nature’s services 50% faster than what the earth can renew. This is very sobering indeed, and requires a major change of thinking on how we should utilize the earth’s natural resources in such a way that all species, including humans, can survive. It is absolutely essential that all jurisdictions tailor their use of natural resources so as not to exceed the carrying capacity of ecosystems. In other words, the sustainability of ecosystems must dictate the level and kind of material economic development permissible. The environment and the economy are not, as so often is stated, on an equal footing for without a healthy, diverse environment, a healthy economy is not possible.

Finally, we recommend that no government agency should have responsibility for both management of the resources for which it is responsible, and the regulation of industrial users. The sometimes close relationship between a government agency and the industry which it is required to regulate should be terminated. This need is highlighted in northeast British Columbia, where, in our view, the relationship between the oil and gas industry and the Oil and Gas Commission may, in part at least, be responsible for the rate and extent of shale gas development, with little regard for the impact of this development on the environment. Such a close relationship between regulator and regulated is not in the public interest; it is wrong.

We appreciate the opportunity to make these comments.

Sincerely,



John Neville  
President

cc Premier Christy Clark  
Vancouver Sun Newspaper  
Species at Risk