



NC/10-0056-650

April 26, 2010

The Honourable Peter Gordon MacKay
Minister of National Defence
and

The Honourable Jim Prentice
Minister of the Environment
House of Commons
Ottawa, Ontario
K1A 0A6

Dear Sir(s):

Re: Suffield National Wildlife Area, CEEA-EUB Joint Review Panel Decision 2009-008: EnCana Shallow Gas Infill Development Project and the Conservation of Wildlife in Canada

We approach fifteen months since the Joint Review Panel (the Panel) established by the Federal Minister of Environment and the Alberta Energy Utilities Board to consider a proposal by EnCana Corporation to drill 1,275 shallow gas wells in the Canadian Forces Base (CFB) Suffield National Wildlife Area made its recommendations on the project. As we await the government's decision, the Suffield Coalition¹ and the undersigned members of the Canadian Nature Network call again on the federal

¹ The Suffield Coalition comprises seven groups: Alberta Wilderness Association, Federation of Alberta Naturalists, World Wildlife Fund Canada, Nature Saskatchewan, Southern Alberta Group for the Environment, Grasslands Naturalists, and Nature Canada

government to close the door on further industrial development in CFB Suffield National Wildlife Area and to ensure this and other federal protected areas for wildlife support broad goals for conservation of biodiversity.

The undersigned agree with the Panel's findings that EnCana's project would likely result in significant adverse effects on species at risk and consequently interfere with the conservation of wildlife. As the Panel points out, avoiding such interference is a requirement of the *Wildlife Area Regulations*. Upon detailed review, however, we have grown concerned that the Panel's conclusions may be misread to imply a narrow interpretation of "conservation of wildlife" as limited to the conservation of species at risk. We want to take this opportunity to share our view of why any such narrow interpretation should be avoided in the case of Suffield and future potential applications to carry out activities prohibited under sections 3, 4 and 7 of the *Wildlife Area Regulations*.

National Wildlife Areas definitely can and should play an important role in ensuring the survival and recovery of species at risk. However, we believe the focus for implementing the *Canada Wildlife Act* and *Wildlife Area Regulations* should be on broader wildlife and habitat conservation goals, to help prevent more species from becoming at risk in addition to contributing to the survival and recovery of those already at risk. Canada's success in preserving its biological diversity depends on the effective implementation of all the different statutory conservation tools at its disposal. The *Canada Wildlife Act* and its *Regulations* should be effectively implemented to conserve wildlife and its habitat; the *Migratory Bird Convention Act* needs to be effectively implemented to conserve migratory birds; and the *Species at Risk Act* should be effectively implemented to assess species, list those that are at risk, identify their critical habitat and plan and act effectively for their recovery. There is no question that synergies among these tools should be maximized, but these synergies should be achieved by casting the broadest, not the narrowest net. A narrow interpretation of the purpose of the *Canada Wildlife Act* and its *Regulations* is inappropriate for Suffield National Wildlife Area and could be detrimental to biodiversity conservation in Canada.

The Panel conclusions that the EnCana project would negatively impact species at risk and therefore interfere with the conservation of wildlife should be read in the context of its broad recognition of the importance of the National Wildlife Area for the conservation of wildlife. Seventeen species listed by COSEWIC as at risk occur within Suffield National Wildlife Area. Critical habitat of the threatened and endangered species among them needs to be identified, and effectively protected, within Suffield National Wildlife Area and beyond. But more than 1,100 catalogued endemic grassland species also occur within Suffield National Wildlife Area, making this one of the most valuable native prairie grassland areas remaining in Canada. In fact, grasslands are one of the most endangered ecosystems in the world, and for this alone, Suffield National Wildlife Area should be fully protected from further industrial impacts. The Panel notes in its report that the National Wildlife Area was created to protect the area's ecological integrity and that its attributes must be preserved. It also calls for a management plan and reserves the right of the Base Commander to refuse any development that interferes with wildlife conservation. These safeguards point to the fact that preventing impacts on species at risk alone is not sufficient to accomplish the purposes of the National Wildlife Area.

In this International Year of Biodiversity, we call on the federal government to reaffirm its commitment to biodiversity by embracing the broad wildlife conservation purpose of the *Canada Wildlife Act* and *Wildlife Area Regulations*. As a first and key step to implement this renewed commitment, we call on the government of Canada to close the door on any further industrial development within Suffield National Wildlife Area and ensure the long-term conservation of Suffield as one of the most important areas of native grasslands remaining in Canada and North America.

Sincerely,

A handwritten signature in black ink, appearing to read "Ian Davidson", enclosed within a hand-drawn oval shape.

Ian Davidson
Executive Director
Nature Canada

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On behalf of:	Alberta Wilderness Association	BC Nature (Federation of BC
	Nature Alberta (formerly Federation of	Naturalists)
	Alberta Naturalists)	Natural History Society of
	World Wildlife Fund Canada	Newfoundland and Labrador
	Nature Saskatchewan	Ontario Nature
	Southern Alberta Group for the Environment	
	Grasslands Naturalists	
	Nature Canada	

CC: Cynthia Wright, ADM, Environment Canada, Environmental Stewardship Branch
Virginia Potter, Director General, Environment Canada, Canadian Wildlife Service