



January 11, 2018

Mary Jane Roberts,  
Director,  
Species at Risk Act Management and Regulatory Affairs  
Canadian Wildlife Service,  
Department of the Environment  
Via email: [ec.LEPreglementations-SARAreulations.ec@canada.ca](mailto:ec.LEPreglementations-SARAreulations.ec@canada.ca)

**Re: Changes to Schedule 1 (the “Legal List”) of the Species at Risk Act**

Dear Ms. Roberts,

BC Nature (The Federation of British Columbia Naturalists, [www.bcnature.ca/](http://www.bcnature.ca/)) represents over 53 local nature clubs throughout BC, with more than 6,100 members. The motto of our organization is to “Know Nature and Keep it Worth Knowing”. Thus, ensuring species and their habitats in BC and Canada are conserved is very important to our members.

On December 16, 2017 we received notification from the Pacific Region of a proposal to amend Schedule 1 of the Species at Risk Act (SARA) for 13 terrestrial species, which includes a number of species that reside in BC. We are of the understanding that between May 2011 and November 2015, fewer than seven per cent of potentially at risk species received government protection under the former Conservative majority. Thus, many species that should have been listed on Schedule 1 of SARA still await protection, placing them and their habitat at further risk and leading to greater challenges and costs for recovery.

We understand that the mandate letter to Environment and Climate Change Minister Catherine McKenna listed the following as one of the priorities: enhance protection of Canada's endangered species by responding quickly to the advice of scientists and completing robust species-at-risk recovery plans in a timely way. We strongly support this priority and the science based recommendations from the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) to amend Schedule 1 of SARA for the 13 terrestrial species they have assessed.

Given decisions by the past Federal government, we have a current need to increase recovery efforts for species at risk, and a need to be true to the intent of SARA. We ask that the Federal government accept COSEWIC’s advice through an order that will amend Schedule 1 of SARA.

We want to thank the Federal government for issuing an order on November 15, 2017 to amend Schedule 1 of SARA, which added 4 bird species found in BC: Bank Swallow (Threatened, 2011), Barn Swallow (Threatened, 2013), Bobolink (Threatened, 2010), and Western Grebe (Special Concern, 2014). As noted by the COSEWIC assessment dates included above, all of these species should have been listed to Schedule 1 much sooner to aid in their recovery.

Based on discussions with Richard Cannings, Member of Parliament for South Okanagan - West Kootenay, and recent press releases, it is our understanding that Minister McKenna has agreed to introduce policy which ensures advice received from COSEWIC is addressed in a timely manner with respect to the listing of species under Schedule 1 of SARA (i.e., COSEWIC's advice is not ignored, as with the previous Conservative government, and species and their habitats are protected under SARA, allowing the act to function as intended). As such, we look forward to further amendments to Schedule 1 to reduce the backlog of species and their habitats that require protection under SARA and ensure new species receive adequate protection.

We appreciate your government's work to protect and recover species and their habitats in Canada.

Sincerely,



Cornelis Visser, Ph.D., Acting President  
For A. Burger, Ph.D., President  
BC Nature (Federation of British Columbia Naturalists)

cc.

The Honourable Catherine McKenna, Minister of Environment and Climate Change Canada  
[Ec.ministre-minister.ec@Canada.ca](mailto:Ec.ministre-minister.ec@Canada.ca)

The Honourable George Heyman, BC Minister of Environment and Climate Change Strategy,  
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