



February 9, 2024

CFN 70825

VIA EMAIL

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Environment and Climate Change Canada
867 Lakeshore Rd.
Burlington ON L7S 1A1

RE: Comments on Canada's Interim 2030 National Biodiversity Strategy

Thank you for the opportunity to comment on the interim 2030 National Biodiversity Strategy. The rapid loss of biodiversity is alarming, and we applaud and support the government's efforts to halt, reverse and restore our ecosystems and the services they provide.

Since 1957, the Toronto and Region Conservation Authority (TRCA), as enabled through Ontario's *Conservation Authorities Act*, has taken action to enhance our region's natural environment and protect our land, water and communities from the impacts of flooding and increasingly extreme weather events, Ontario's leading cause of public emergencies. As the region's first line of defence against natural hazards, TRCA maintains vital infrastructure and provides programs and services that promote public health and safety, protecting people and property. TRCA mobilizes a science-based approach to provide sound policy advice, leveraging its position as a not-for-profit operating in the broader public sector to achieve collective impacts within our communities and across all levels of government.

The work of TRCA very much aligns with the National Biodiversity Strategy. We pursue applied research to better understand the current and potential future state of biodiversity and habitat in our jurisdiction in the face of a changing landscape and climate. We believe that biodiversity thrives when there is optimal habitat that provides the right environmental conditions and resources. This includes areas that are necessary for wildlife to carry out their life cycle needs such as feeding, moving, and reproducing. It is necessary to have a good quantity and quality of habitat to meet regional biodiversity needs. An ecosystem with high species diversity, including genetic species diversity, is better equipped to adapt to a wide variety of environmental conditions and disturbances. Greater biodiversity also enriches our community by providing several critical ecosystem goods and services, including the purification of water and air, flood and erosion mitigation, food and medicine provision, cultural and recreational opportunities, and physical and mental health benefits.

Government Proposal

We understand that this interim National Biodiversity Strategy (the Strategy) outlines Canada's priorities and contribution towards implementation of the Kunming-Montreal Global Biodiversity Framework (KMGBF). The mission of the KMGBF is to halt and reverse biodiversity loss by 2030 and restore biological diversity by 2050.

At this time, Environment and Climate Change Canada (ECCC) is seeking feedback on the work completed to date for the interim Strategy, including suggestions for tools, actions, and critical paths. The interim Strategy is described as a milestone document with a high-level overview of the main elements including the vision, mission, pillars, and areas of work. The areas of work match the themes and targets of the KMGBF. The Annex of the Strategy provides preliminary and conceptual implementation plans for each target. We understand that these implementation plans will be completed in the first quarter of 2024 and the Strategy will be finalized later this year, prior to the 16th meeting of the Conference of the Parties to the United Nations Convention on Biological Diversity (COP16).

TRCA staff have reviewed the work completed to date on the interim Strategy and provide the following comments, with detailed comments in the table below, for ECCC's consideration.

General comments

TRCA finds the Strategy to be comprehensive and moving in the right direction by identifying priorities, gaps, challenges, and determining steps to achieve targets. We look forward to ECCC's implementation plans to be developed in the coming months. It will be important to evaluate existing initiatives, like the 2020 Biodiversity Goals and Targets for Canada (biodivcanada.ca) before finalizing the implementation plans for each target. The government's increased leveraging of existing legislative, regulatory and policy tools available under the Impact Assessment Act, the Fisheries Act and the Species at Risk Act are also key to implementing the Strategy.

TRCA appreciates the government's commitment to biodiversity and consulting on the development of an updated Strategy. Conservation authorities (CAs) strive to take a holistic ecosystems approach to mitigating and adapting for climate change risks such as declines in biodiversity, including through watershed planning. Given that land use change is a key biodiversity stressor, and that recent provincial legislative change has restricted CAs' role in the planning and environmental assessment processes, federal direction to local land use planning decision makers is of heightened importance.

TRCA would welcome specific direction to local government and public agencies, perhaps through a federal biodiversity directive on land use change. Policy or regulatory tools with a biodiversity lens are needed for stakeholders to implement "on the ground" for both private development and public infrastructure. Given the immense development pressures stemming from the housing affordability crisis, it will be important to emphasize in policy and in implementation, a balance between housing and infrastructure needs and biodiversity and the environment, so we can grow resilient communities in a sustainable way.

Detailed comments

Target	TRCA comment
<p>Target 1: Spatial planning and effective management</p>	<ul style="list-style-type: none"> • With respect to halting the loss of ecosystems with “high ecological integrity,” a clear definition is needed to ensure appropriate outcomes are achieved. What values can be used to determine integrity? Examples are given but an explicit definition would set clearer parameters for this target. • “A first step in the retention of areas of high biodiversity importance is their identification” – Canada does not have a pan-Canadian state of biodiversity assessment to serve as a baseline (as other nations have done, building on the work of IPBES (Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services). Such an assessment would be helpful to support implementation of the forthcoming accountability framework. • Where loss cannot be avoided, minimized, and mitigated, consider ecosystem compensation – e.g., TRCA’s Guideline for Determining Ecosystem Compensation and other emerging wetland compensation schemes (e.g., Ontario Nature). • With respect to the year range for land use change (2010-2015), would 2010 be the baseline and perhaps land use change is assessed every 5 years? e.g. 2010 vs 2015 then 2010 vs 2020 etc. • Strengthen linkages between natural hazard management (and spatial planning) and biodiversity. For example, in TRCA’s jurisdiction, the majority of remaining natural land cover is found within TRCA’s Regulated Area (made up largely of lands subject to flooding and erosion), including 70 percent of all forest cover and 95 percent of all wetland cover (TRCA 2017-2022 Sustainability Report).

<p>Target 2: Ecosystem restoration</p>	<ul style="list-style-type: none"> • We appreciate that this target highlights addressing knowledge gaps. For example, there is some ambiguity around what will be defined as “effective restoration”. Perhaps this will be determined through the funding of research on knowledge gaps. • Restoration blueprint – TRCA’s Integrated Restoration Prioritization (IRP) and Nature-Based Climate Solutions Siting Tool (funded by ECCC) can offer examples of possible ways to define and identify degraded areas and identify priority areas for restoration. • While government funding for restoration, capacity building, and training will be key, it is also important to advance alternative funding models. For example: <ul style="list-style-type: none"> ○ ALUS Canada provides payments to farmers and ranchers for maintenance/inspection following implementation of nature-based solutions on their lands. In the future, this payment could be expanded to pay for the ecosystem services provided. ○ Carolinian Canada’s Conservation Impact Bond is another great example. • Funding will also be important to address knowledge gaps related to “baseline data for ecosystem health and long-term status and trend data” – this would be ideally supported by community-based or watershed-scale initiatives. • This target and others listed in the Strategy as appropriate could benefit from characterizing the current state and setting a baseline for enabling progress to be measured. For example, adding the current coverage of terrestrial ecosystem and the percentage degraded for Target 2 could help set the long-term vision for ecosystem restoration.
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	<ul style="list-style-type: none"> • Under the heading, “Preventing Ecosystem Degradation and facilitating ecosystem restoration”, the final bullet in this target references the Impact Assessment Act and Fisheries Act. Similar reference should be included in Target 1 for protection of existing resources and habitats. Increased support for implementation and enforcement of existing legislation would serve as an immediate means to meet multiple targets. • The focus on prevention of degradation does not explicitly prevent outright removal of features and habitats outside of protected and conserved areas. This is crucial to maintenance of biodiversity. Efforts and targets to protect habitats should be featured more prominently in the document. Further, not only is biodiversity achieved by protecting natural areas (areas where human activities are not permitted) it also requires dedicated resources to manage and maintain areas over the long term.
<p>Target 2: Ecosystem restoration and Target 3: Protected and conserved areas (30x30)</p>	<ul style="list-style-type: none"> • We suggest refining conservation targets by assigning distinct, ecosystem-specific values. Target 2 aims for the restoration of 30% of degraded ecosystems by 2030 (30x30) but could be enhanced by delineating explicit objectives for each ecosystem type. This approach would ensure more precise and effective restoration efforts by addressing the unique characteristics and needs of terrestrial, inland water, marine, and coastal ecosystems individually. • To assess the effectiveness of achieving the targets, it is crucial to understand the rate of ecosystem degradation. This knowledge will determine if the 30x30 conservation and restoration goals would only decelerate biodiversity loss or actually begin to reverse it. This is a fundamental detail in evaluating the real impact of these targets.
<p>Target 3: Protected and conserved areas (30x30)</p>	<ul style="list-style-type: none"> • The implementation for this makes sense, and there appears to be good knowledge of where levels are at and how much is still needed. Mention of “ecologically representative” and a “diverse portfolio” of areas suggests that cities/urban centres would be included. Given the proximity of natural features within urban areas to large populations, these ecosystems experience unique pressures and represent significant opportunities. Their inclusion and expansion as protected and conserved areas will support biodiversity both locally and throughout the country.

<p>Target 4: Species recovery</p>	<ul style="list-style-type: none"> • TRCA agrees on the need for whole government coordination for implementation of the federal Species at Risk Act (SARA) and provincial species legislation. Gaps can result where two separate pieces of legislation apply, but only one is enforced, therefore, coordination among provincial and federal governments is needed in the development and implementation of recovery plans. • Furthermore, municipalities can play a significant role in influencing how legislation is implemented. Coordination on a program and individual file basis is required. • Under heading, “How we will achieve the 2030 target?” <ul style="list-style-type: none"> ○ The factors listed do not include outright removal of features and habitats, rather, habitat degradation is the focus. While this is a significant issue, habitat removal should be included specifically. ○ The referenced protections under SARA require staff level implementation of legislation. The discussion here paints the false picture that "automatic protections" translate to protection of species and habitats on the ground. Without deliberate and enhanced efforts for staff to implement and enforce legislation, protection of SAR resources cannot/is not taking place.
<p>Target 6: Invasive alien species</p>	<ul style="list-style-type: none"> • The link between Target 6 and Target 8 (Minimize impact of climate change) should be emphasized more strongly. Climate change is already exacerbating the introduction and spread of invasive species. Invasive plants, pests, and diseases are expected to worsen with climate change due to longer growing seasons, increased disturbance, and increased carbon in the atmosphere. • Recognizing and addressing potential conflicts among targets so they are better aligned is critical for implementation of the Strategy. For example, targets to reduce the spread of invasive species potentially conflict with targets for improved connectivity. While both targets are valid for improving ecosystems, meeting the latter target could exacerbate the issue being addressed in the first targets. These types of trade-offs are common among other targets as well. A possible solution would be to place qualifiers on targets where these conflicts arise, e.g., fish barrier removals require assessment of aquatic invasive species risk prior to implementation.

	<ul style="list-style-type: none"> • Explicit mention of monitoring/early detection and rapid response could be highlighted when talking about “surveillance systems” and discussion around emerging threats. • With regard to pesticides as the “best tool to respond to IAS introductions or establishments,” - if the goal is to reduce risks from pesticides, there is a need for increased research of control techniques including biological controls.
<p>Target 7: Pollution and biodiversity</p>	<ul style="list-style-type: none"> • This target may benefit from reference to coordination with other programs and mechanisms such as the role of the new Canada Water Agency. • There could be actions focused on other existing tools to help meet this target, such as evaluating and updating the Canadian Water Quality Guidelines and continuing to implement the Environmental Damages Fund. • Further, the Code of Practice for the Environmental Management of Road Salts and required reporting could be used to track changes in road salt application rates. Private operators could also be inputting data if new legislation is implemented nationwide (e.g. New Hampshire model). Water Quality in Rivers (target 11) could be used to track chloride trends.
<p>Target 8: Climate change and biodiversity</p>	<ul style="list-style-type: none"> • This target emphasizes how nature can minimize the impacts of climate change (disaster risk reduction, nature-based climate solutions etc.). In this regard, Target 1 (Reducing land/sea use change and keeping wild spaces) should be referenced, as maintenance of existing habitats and natural areas is crucial to minimizing the impacts of climate change. Habitats and areas both inside and outside of protected and conserved areas should be considered here. • This target should also focus on how biodiversity is impacted by climate change and methods to halt this loss and degradation. Although these twin crises have some common approaches, climate mitigation and adaptation each have their own policy and agenda. Only the last paragraph includes some information from that perspective, but is missing: fire, shifts in species traits, and other climate change impacts. • Areas of conservation and restoration areas are needed to create climate refugia by considering the future ranges of the species/ ecosystems (this is also related to Targets

	<p>2 and 3). These targets include scientific gaps. Clear priorities should be included to identify specific gaps and funding to fill them.</p>
<p>Target 12: Urban green and blue spaces</p>	<ul style="list-style-type: none"> • An increase in green and blue spaces should be strategically focused particularly where they are underrepresented. Perhaps add this concept of equity to the target, i.e., “Significantly increase the area and quality, and connectivity of, access to, and benefits from green and blue spaces in urban and densely populated areas sustainably <i>and equitably</i>.” • Promote importance of provincially enabling policies and guidance for municipalities to adopt “green standards” such as green buildings and low impact development, including green infrastructure that can boost biodiversity in urban areas. • Not just create new – but expand and enhance existing blue/green spaces as well (e.g., Rouge National Urban Park). • TRCA’s Nature-Based Climate Solutions Siting Tool offers an example of how to identify strategic locations for nature-based solutions near where people live.
<p>Target 14: Mainstreaming of biodiversity values</p>	<ul style="list-style-type: none"> • Strongly agree with this target’s statement to, “ensure the full integration of biodiversity into policies, regulations, planning and development processes . . . environmental assessments...within and across all levels of government...in particular those with significant impacts on biodiversity.” • A tool for mainstreaming biodiversity in these processes may be specific direction from the federal government to urban municipalities that cities should strive towards a certain threshold of areas that support biodiversity. Perhaps this could be done through an update to, “How Much Habitat is Enough?” • Increasing awareness – should also include ways to (re)establish people’s relationship with nature and biodiversity and its importance. • Could include mention the integration of green infrastructure in asset management (e.g., O.Reg.588/17).
<p>Target 16 / 15(b): Sustainable consumption</p>	<ul style="list-style-type: none"> • Need consistent and reliable national standards of what products are “sustainable,” (e.g., packaging) to help consumers make informed (easy) decisions

Attachment 2 TRCA Comments National Biodiversity Strategy 2030

Target 21: Knowledge sharing	<ul style="list-style-type: none">• A national data sharing and reporting platform that brings together regional/local data is needed; Census of Environment as a first step.• Consider national education curriculum related to biodiversity.
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Thank you again for this opportunity to comment on the interim National Biodiversity Strategy. We would like to continue to be engaged, especially as it relates to implementation tools given TRCA's experience across federal, provincial and local policy frameworks, our on-the-ground biodiversity initiatives, and scientific expertise in the natural systems of our watersheds.

Should you have any questions, require clarification, or wish to meet to discuss any of the above remarks, please contact the undersigned at (437) 880-2282 or at laurie.nelson@trca.ca.

Sincerely,

<Original signed by>

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