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Honourable Robin Campbell
Alberta Minister of ESRD
#323 Legislature Building
10800 - 97 Avenue
Edmonton, AB T5K 2B6

Dated: July 15th, 2014

Re: AESRD Wetlands Policy

Dear Minister Campbell,

I am writing on behalf of the **Alberta Chapter of The Wildlife Society**, a 250 member organization representing private, academic and government wildlife professionals in the province, to voice concern about of the direction the government of Alberta is moving on the *Alberta Wetland Policy (AWP): A Shift in Values*. First, however, we would like to compliment you on moving towards a wetland policy. This is an important, valuable and essential piece of legislature to protect our wetlands.


The goals and outcomes of AWP are positive, as is the overall direction to avoid and minimize impacts to wetlands, and replace impacted wetlands as a last resort. However, there are several issues that cause the Alberta Chapter of the Wildlife Society concern. These are: a lack of clarity around rules related to “avoid, minimize and replace”; the value system for replacement; replacement ratios; the move away from an area-based system and the compensation options.

1. Without clear, simple rules about what type of wetlands must be avoided by development and in what types of situations “minimize” applies, the likelihood of resorting to the lowest common denominator of “replace” would be very strong. Without clear rules the system would be ad hoc and could lead to undesirable outcomes. The policy implementation needs assurance that avoidance and minimization always are the first choices of development.
2. The attributed value system for replacement indicates the potential for human use to be rated above other values such as biodiversity, carbon sequestration, etc. Value systems are extremely difficult to assess. Is it more important to have recreation areas for Albertans than to mitigate climate change? Is biodiversity more important to human well-being than economics? The complexities of these types of questions lead us to suggest that a more conservative risk reduction strategy, such as no net loss, might be a better approach. This

- is the precautionary principle and it has substantial merit in this matter.
3. Suggested replacement ratios of up to 1:8 for 'lower valued' abundant wetlands are extremely risky. For example, estimated existing oil sands development alone could impact 460,000 ha of peatlands (bogs and fens). Present oil sands mining closure plans show a very high degree of replacement of wetlands with upland habitats. Peatlands are currently abundant throughout the boreal forest but, under full oil sands development scenarios, could become scarce in certain areas. Restoration of peatlands is very difficult and extremely costly. Peatlands sequester carbon but when drained they release carbon. The policy would potentially allow proponents to reduce large tracts of abundant peatlands by 87.5% (1/8th) in the boreal. This large reduction in peatlands is unacceptable.
 4. The AWP suggests wetland replacement could occur elsewhere in the Province i.e., from green zone to white zone. A move away from an area-based to a value-based system has some merit. However, that transition comes with the risk of failing to compensate appropriately. The characteristics of Alberta's ecological zones have evolved over millennia. Transformation of these could again have far-reaching and undesirable outcomes.
 5. The AWP allows compensation options that fund education and research. Given the critical role that wetlands play on our landscapes, we suggest compensation should be restricted to restoration and securement of threatened wetlands. Education and research need to be funded from other sources and not at the cost of wetland replacement.

The AWP needs to be more than a mechanism to allow development to occur unhindered. A provincial policy on wetlands requires balancing of development with protection of ecosystem services. We strongly urge you and your government to consider the points above in the drafting of the implementation details for The Wetland Policy. It is critical to recognize the ecological value of our wetlands and the need to preserve the integrity of and the environmental goods and services they provide.

Yours truly



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President,
Alberta Chapter of The Wildlife Society