



Recommendations for Canada's 2030 National Biodiversity Strategy Yellowstone to Yukon Conservation Initiative, Feb 9, 2024

Dear Minister Guilbeault,

On behalf of the Yellowstone to Yukon Conservation Initiative (Y2Y), we are writing to share our views on the federal government's [Milestone Document](#), outlining how Canada's 2030 National Biodiversity Strategy will be framed. The purpose of this letter is to highlight ideas for tools, actions and critical paths to achieve the goals and targets of the Kunming-Montreal Global Biodiversity Framework (GBF), focusing on Y2Y's key areas of expertise.

Introduction

Canada played a leading role in securing the ambitious new GBF at COP 15 in Montreal. Building on that work, Canada now has the opportunity, and the responsibility, to continue to lead through the development and implementation of a strong and effective National Biodiversity Strategy and Action Plan (NBSAP) to halt and reverse nature loss by 2050. We welcome and appreciate the opportunity to engage in the process.

Yellowstone to Yukon Conservation Initiative (Y2Y) is recognized as the world's leading large landscape conservation initiative. Y2Y is a transboundary model and uniquely placed to play an essential role in meeting Canada's commitments under the GBF biodiversity targets by identifying key projects, facilitating collaboration across jurisdictions and sectors, and building support for implementation of the GBF in key constituencies.

Y2Y is a joint U.S. Canada non-profit organization dedicated to the mission of connecting and protecting this 3,400 km region, including Alberta, British Columbia and the Yukon, so that people and nature can thrive. As a big-tent organization working with many governments, people and partners to achieve increased protections and connectivity, our approach is landscape scale, science/knowledge based and collaborative and we have seen success. Since 1993 we have worked with over 700 partners including scientists, Indigenous communities, urban and rural communities, non-profit organizations, businesses, and local, provincial and federal governments - and protected areas have increased by more than 80%, within the Y2Y region. Already at least 25% of the protected areas are managed or co-managed by Indigenous Peoples, and many new Indigenous-led conservation are advancing.



These recommendations build on Y2Y's input to the first public consultation on Canada's NBSAP in July 2023 (both through the ECCC survey and in Y2Y's independent submission), and reflect our particular areas of expertise and experience; protecting and connecting habitat so people and nature can thrive. Y2Y contributed to and endorses the recommendations collaboratively submitted by 20 national and regional environmental and conservation NGOs: the "Joint environmental organization input into Canada's National Biodiversity Strategy and Action Plan: Response to the Milestone Document" (the "NGO Joint Submission"), attached and referenced throughout this submission.

We have focused our recommendations on specific actions the federal government needs to take to deliver on this promise of systematic change through cross-cutting approaches as well as actions to implement individual targets.

Cross Cutting Actions = Transformational Change

The purpose of the GBF is "... to catalyze, enable and galvanize urgent and transformative action by Governments, subnational and local governments and with the involvement of all of society to halt and reverse biodiversity loss, to achieve the outcomes it sets out in its vision, mission, goals and targets...".

Consistent with this purpose, the Milestone Document clearly articulates the need for ambitious transformational change, commits to a whole-of-government and society approach, and recognizes the critical importance of supporting Indigenous leadership in implementing the GBF. However, more details are needed on the challenge of "how". For example, at this point the Milestone Document does not set out clear steps or actions that address how the Government of Canada will manage conflicting objectives, mandates and jurisdictions to better align with the GBF goals and targets, whether it is within the federal government, among provincial, territorial and Indigenous governments, or within productive sectors that Canadians rely on.

To succeed and deliver on these commitments, cross cutting actions are needed to enable whole of government and society approaches, and effective and equitable conservation outcomes. The NGO Joint Submission identifies a suite of recommended cross-cutting actions to advance the systems-level change needed to meet the ambition of the NBSAP. These recommendations support many pillars in the Milestone document and include:

- Indigenous-led conservation
- Aligning public and private finance with KMGBF objectives
- A whole of government/society approach - Improving policy coherence across all level of government;
- Mainstreaming biodiversity across key sectors
- Enhancing accountability to deliver on KMGBF commitments

As a signatory to the NGO Joint Submission, Y2Y contributed to, and fully supports the NGO Joint Submission (attached) and its Recommended actions. We refer you slides 3-11 of the NGO Joint Submission which sets out detailed recommendations on each of the cross-cutting actions.

Target by Target Recommendations

Today, habitat loss and fragmentation are the leading causes of enormous biodiversity loss. Within this context and the challenges of climate change, science, traditional knowledge and experience has shown us that collaborative large landscape conservation and connectivity is critical. Outcomes from both CoP-15 and CoP-27 also framed the need for significant protected area growth *and* connectivity as crucial to solving the two largest crises facing the world today: climate change and biodiversity loss. Accordingly, Y2Y, with a mission to protect and connect habitat so people and nature can thrive, has highlighted its recommendations for the GBF targets under two headings: Protecting Nature and Connecting Nature

Protecting Nature (Targets 1, 2, 3, 4, 8 and 14)

Protecting nature not only supports but is essential to tackling both the biodiversity and climate crises and is key for climate goals of adaptation, mitigation and sequestration. Globally and in Canada, habitat loss and degradation is the most significant direct driver of biodiversity loss on land. Thus, maintaining and restoring habitat must be at the core of Canada's National Biodiversity Strategy.

Targets 1 and 3 are key to stopping the loss of habitat and permanently protecting ecosystems with significant ecological and cultural values. Ensuring the quality, quantity and equity elements of these targets are implemented, tracked and reported is necessary for achieving biodiversity conservation outcomes.

Indigenous-led or co-led conservation initiatives are already underway across the country, offering a pathway to delivering on the targets in much of the country. Y2Y is currently engaged in a number of initiatives which could result in new significant protections for land, biodiversity, culturally significant areas, species habitat conservation and nature-based climate solutions and the 30x30 goals, and other efforts to meet Canada's international biodiversity commitments. Through partnerships with Indigenous governments, Y2Y has articulated a pathway to reaching 30% by 2030 across the Y2Y region totalling more than 41 million acres. From the [Ross River IPCA](#) in the Yukon and [Nío Ne P'əné](#) initiative in the Northwest Territories, to the [Dene K'éh Kusān](#), [Gwininitxw](#), [Wilp Wii Litsxw Meziadin](#), and [Ingenika](#) IPCAs in northern B.C., to IPCA proposals and declarations from the [Simpw First Nation](#), [Ktunaxa Nation](#), [Blackfoot Confederacy](#) and more across the Y2Y region, we have a big, bold, achievable vision that can help meet the government of Canada's challenge to protect 30% of lands by 2030, while protecting and restoring net biodiversity.

Recommendations:

Y2Y contributed to, and fully supports the NGO Joint Submission recommendations (attached) regarding Targets 1, 2, 3, 4, 8 and 14.

Connecting Nature (Targets 1, 2, 3, 4, 8 and 14)

The outcome of the GBF is that ecological connectivity is front and center. In addition to core protected areas, functional wildlife corridors are critical to maintain, enhance or restore ecological connectivity among and between those protected areas. Maintaining and restoring ecological connectivity across landscapes is essential to sustain healthy ecosystems, combat fragmentation, conserve biodiversity and to build resilience to climate change across all biomes and spatial scales. Well-connected ecosystems support wildlife migration, hydrology, nutrient cycling, pollination, seed dispersal, climate adaptation, and disease resistance.

The GBF emphasizes the fundamental contribution that ecological connectivity makes to healthy functioning ecosystems and species, and its benefit to people by embedding connectivity *throughout* the GBF:

- **Goal A:** “ The integrity, **connectivity** and resilience of all ecosystems are maintained, enhanced or restored;
- **Target 1: connectivity** a key criterion for achieving “...participatory, integrated and biodiversity inclusive **spatial planning**”;
- **Target 2: connectivity** as part of maximizing the benefits and outcomes of **restoration** for entire landscapes and seascapes;
- **Target 3:** “Ensure and enable that by 2030 at least 30 per cent of terrestrial, inland water, and of coastal and marine areas... are effectively conserved and managed through ecologically representative, **well-connected** and equitably governed systems of protected areas and other effective area-based conservation measures.”;
- **Target 12: Connectivity** is vital to increasing benefits for biodiversity and human well-being in urban/densely populated areas; and
- **Target 14: Connectivity** is inherent but not specifically mentioned in other targets such as Target 14 where connectivity is part of ensuring “the full integration of biodiversity and its multiple values into policies, regulation, planning and development processes...”.

Recommendations:

1. Y2Y contributed to, and fully endorses the NGO Joint Submission recommendations (attached).
2. Commit permanent funding for Parks Canada’s National Ecological Corridors Program (NECP)
 - a. Build from Parks Canada’s NECP, which is:
 - i. the 1st of its kind in North America and a leading example globally, given the size and scale of Canada, the diversity of landscapes, ecosystems and species, and its collaborative and inclusive approach;
 - ii. working with the U.N. World Conservation Monitoring Centre as global leaders tracking the status of their corridors at a global level; *and*
 - iii. has “on-the- ground” conservation projects across the country.

- b. Develop a national connectivity program and policies that help identify priority areas for connectivity, support ecological corridor conservation and restoration, and track progress.
- 3. Develop an integrated and funded program for advancing **transboundary conservation**, including ecological networks at regional, national and international scales. Transboundary conservation:
 - a. Is critical for maintaining connectivity and long-term survival of wide-ranging species and of people and cultures. Indigenous-led examples to build from include: Porcupine Caribou Herd: Alaska / Yukon and the linnii Initiative / The Return of the Buffalo.
 - b. Requires cooperation and coordination between different agencies of neighbouring countries which can be strengthened through agreements and memorandums of understanding between jurisdictions.
 - c. Results in stronger relationships: for example, the Canada-U.S. partnership, which is defined by shared geography, similar values, common interests, strong economic ties and a shared environment. The two countries have a long history of cooperation and working together to address shared economic and environmental challenges and this could be expanded in both the biodiversity and climate contexts through:
 - i. regular information sharing and updates among various U.S. Canadian government agencies and department to clarify and standardize approaches and best practices that can be tailored to realities on the ground.
 - ii. exploring how this transboundary work can enhance how the two countries work together through multiagency or department collaboration and with Indigenous leadership and involvement.
- 4. Develop a Wildlife Crossing Infrastructure Strategy and Fund to ensure safe passage for people and wildlife across roads, stimulate local economies and create jobs that includes:
 - a. A whole of government approach involving Infrastructure Canada and Transport Canada;
 - b. long term consistent funding (The US Wildlife Crossing Pilot Program is a potential model to follow)
 - c. a requirement that wildlife mitigation measures be included in project proposals for federal infrastructure funding for federal, provincial and territorial highways to make busy roads permeable to wildlife and safer for wildlife and people.
 - d. federal support for scientific analyses that address the impacts of infrastructure on ecological connectivity through for example, fine-scale road and rail ecology analyses and assessments to identify priority sites for wildlife crossing improvements, assess feasibility, and develop site and species-specific recommendations.

One of the greatest threats to wildlife and people is increasingly busy roads, especially highways, that are impassable for wildlife. Advancing strategic wildlife crossing structures will help get animals safely across busy highways, reducing human injury and property loss and serve to protect biodiversity by maintaining movement routes. Bigger underpasses also address climate change by planning for the new reality of mega flooding and extreme weather events as well as shifting species' ranges.

Conclusion

An NBSAP that recognizes the need for ambitious, transformational change; includes clear actions for implementation; and commits funding to support key solutions such as implementing 30x30, increasing landscape connectivity and supporting Indigenous led conservation, is essential to stem the dual climate and biodiversity crises in Canada, and can also help get the world on a positive path to halt and reverse biodiversity loss by 2030 and live in harmony with nature by 2050.

Thank you for the opportunity to comment on the Milestone document and for your continued leadership on the GBF. Canada is already home to many models that work, and we look forward to working with the government and would welcome follow-up discussions at any time as you work to develop Canada's NBSAP.

Sincerely,



Jodi Hilty, Ph.D.
President and Chief Scientist

Sincerely,



Sarah Palmer, LL.B, ICD.D
Government Relations & Policy Strategist

cc: Tara Shannon, Kelly Torck, Basile Van-Havre, Martine LaJoie, Michael Brewster, Isabelle Hurley