

July 5, 2021

Dear World Heritage Committee members,

As twenty-six Indigenous communities, environmental groups, civil society organizations and concerned scientists, we write to the World Heritage Committee to express our collective concern with the lack of major and timely conservation actions to address the deterioration of the Outstanding Universal Values (OUV) of the Wood Buffalo National Park World Heritage Site and to express our agreement with the analysis and conclusions that the World Heritage Centre and IUCN have provided to the Committee for consideration at the 44th Session.

We agree that Canada, the State Party, must resolve the major challenges that are undermining the Wood Buffalo National Park Action Plan, and share the view of the World Heritage Centre and IUCN that the case for inscription on the List of World Heritage in Danger is well supported until rapid conservation action is taken. We strongly support the draft decision and the Committee's request for a Reactive Monitoring mission to confirm that Wood Buffalo National Park World Heritage Site meets the conditions for inscription on the List of World Heritage In Danger.

Significant threats to Wood Buffalo National Park continue to exist and grow.

The ecological values of Wood Buffalo National Park (hereafter, the Park) that are protected under the World Heritage Convention are of international importance. Highlights among them include one of the largest boreal deltas in the world, the Peace Athabasca Delta, breeding habitat of the endangered whooping crane, one of the greatest concentrations of migratory birds in North America, an enormous carbon store to combat climate change, and a unique wild relationship between threatened wood bison populations and wolves.

Unfortunately, as acknowledged by Canada in its Strategic Environmental Assessment¹ for the Park, the Park's state of conservation is not meeting World Heritage objectives and key elements of the Park's OUV are on a negative trend. Decisions that occur at the sub-national level by the Governments of Alberta and British Columbia continue to impact the Park through large dams in B.C. and oil sands projects in Alberta on the two major tributary rivers to the Park, in addition to impacts from climate change.

It is now close to a decade since former Parks Canada officials, Indigenous communities and preeminent scientists brought the deterioration of the Peace Athabasca Delta in the Park to the Committee's attention. We do so again, with serious concerns that Wood Buffalo National Park faces greater threats than ever, despite recent investments from the State Party for the Park's Action Plan. Funding alone will not halt the deterioration of the Park's OUV unless accompanied by major and timely actions with clear deadlines, implementation plans, and improved inter-jurisdictional coordination.

¹ Milestone 3 – Final SEA Report: Strategic Environmental Assessment of Wood Buffalo National Park World Heritage Site – Executive Summary. May 2018. Independent Environmental Consultants (IEC).
https://www.pc.gc.ca/en/pn-np/nt/woodbuffalo/info/action/SEA_EES/bulletin

We are concerned that the major and rapid corrective actions needed to effectively address the threats to the Park have not materialized.

We agree that, notwithstanding early efforts by the State Party to implement the Wood Buffalo National Park Action Plan, there is still an urgent need for the State Party to resolve the major challenges that are impeding the tangible corrective actions and governance improvements that are most needed to halt the deterioration of the Park. Of particular concern to us:

- **Canada recently announced an additional three-year funding investment for the Action Plan but leaves key critical conservation actions without funding and/or deferred.** These include, among others, installation of water control structures, long-term monitoring of the Peace Athabasca Delta, new water governance mechanisms and their maintenance, a robust tailings risk assessment, and all conservation actions that will need to continue beyond 2023 to be effective.
- **There have been no changes or improvement to water governance on the major tributaries that support the Park's OUV.** The commitment in the State Party's Action Plan² to establish a protocol to support strategic flow releases to enhance the flooding needed to restore the Peace Athabasca Delta remains unfulfilled. Other actions, like establishing water management structures within the Peace Athabasca Delta cannot be completed with current funding. The lack of effective inter-jurisdictional coordination with provincial governments is a major concern that, until resolved, greatly limits the most needed corrective actions.
- **Construction of the Site C hydropower project—upstream of the Park on its largest tributary—has increased since the Committee noted concern about how that Project may impact the Peace Athabasca Delta.** Diversion of the Peace River for the Site C Project has begun without consideration of how it will negatively impact the Peace Athabasca Delta, and without efforts to correct the Delta's deterioration.
- **New evidence reconfirms that tailings ponds in Alberta's oil sands upstream from the Park remain a persistent unaddressed threat.** The Commission for Environmental Cooperation under NAFTA recently highlighted strong evidence that tailings are leaking into groundwater and that regulatory oversight of tailings is inadequate³. The Tailings Risk Assessment requested at the 43rd World Heritage Committee meeting (43 COM 7B.15) has not been initiated.
- **The Governments of Canada and Alberta have recently initiated processes to legalize the release of oil sands effluent into the Athabasca River within the next 2-3 years⁴.**
- **The absence of effective inter-jurisdictional water governance between Canada, Alberta, and British Columbia, and poorly understood cumulative impacts from**

² Wood Buffalo National Park World Heritage Site Action Plan, 2019. <https://www.pc.gc.ca/en/pn-np/nt/woodbuffalo/info/action>

³ CEC. 2020. Alberta Tailings Ponds II. Factual Record regarding Submission SEM-17-001. Montreal, Canada: Commission for Environmental Cooperation. 204 pp. http://www.cec.org/wp-content/uploads/wpallimport/files/17-1-ffr_en.pdf

⁴ "Government looks at oilsands water release into Athabasca River". Edmonton Journal. May 21, 2019. <https://edmontonjournal.com/news/politics/government-looks-at-oilsands-water-release-into-athabasca-river>

industrial developments originating upstream of Wood Buffalo National Park add up downstream in the Northwest Territories, negatively impacting the waters, wildlife and fish that provide Indigenous and non-Indigenous communities with food security and livelihoods along the Slave River and Delta. The ecological status of the Park is a bellwether for the current and future health of the greater Mackenzie Watershed.

- **Portions of the range of the Ronald Lake Bison Herd—identified for its great conservation importance by the 2016 Reactive Monitoring Mission—remain prioritized for destructive oil sands activities⁵.** The status of other species at risk that depend on the Park, including Wood Bison, Boreal Woodland Caribou and Whooping Crane, remain of serious concern.
- **Other environmental threats associated with oil sands activities, new and old, have not been addressed.**
 - New oil sands projects continue to be approved, constructed, and expanded, without environmental assessment of impacts on the Park's OUV, even after the Wood Buffalo National Park Strategic Environmental Assessment confirmed effect pathways from upstream oil sands projects.
 - Environmental monitoring requirements of oil sands projects were unexpectedly suspended during the pandemic, despite operations continuing⁶
 - Alberta's Auditor General recently criticized Alberta for its weak and ineffective mine financial security programs, noting there was an estimated \$30 billion in environmental liabilities uncollected from industry⁷. The province of Alberta then reduced security payments from oil sands companies for their liabilities this fiscal year⁸, both of which raise overarching concerns about the lack of confirmed resources to ensure legacy mining issues do not threaten the Park.
- **Efforts to transition the Park to a genuine partnership with First Nations and Métis communities in the governance and management of the Park need more progress and support.**

We urge the Committee to take strong action.

We believe that help is needed in the form of a strong decision by the World Heritage Committee at the 44th Session if the State Party is to improve the negative outlook for the Park.

⁵ Imminent Threat Assessment for Wood Bison (*Bison bison athabasca*). June 8, 2021. Environment and Climate Change Canada. <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/related-information/threat-assessment-wood-bison1.html>

⁶ "Alberta First Nations appeal suspension of oilpatch environmental monitoring". National Observer. June 9, 2020. <https://www.nationalobserver.com/2020/06/09/news/alberta-first-nations-appeal-suspension-oilpatch-environmental-monitoring>

⁷ "Auditor scolds Alberta over mine cleanup fund, how province handles polluted sites" June 10, 2021. CBC News. <https://www.cbc.ca/news/canada/edmonton/alberta-auditor-mines-cleanup-oilsands-1.6061474>

⁸ "Alberta changes environmental liability payments for oilsands mines after period of low oil prices". Financial Post. May 6, 2021. <https://financialpost.com/commodities/alberta-changes-environmental-liability-payments-for-oilsands-mines-after-period-of-low-oil-prices>

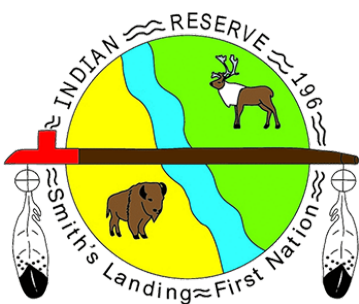
While we believe the State Party can correct course and halt the deterioration of Wood Buffalo National Park, it is clear that it will not happen on its own.

We strongly support a Committee decision at the 44th Session that clearly calls on the State Party to resolve the major challenges identified by the World Heritage Centre and IUCN in its analysis and conclusions, ensure there is sustained funding beyond the next three years, and request the State Party invite a Reactive Monitoring mission to assess its state of conservation. We strongly support the request for a timely update on the Action Plan implementation by 1 February, 2022 for consideration at the 45th Session of the World Heritage Committee.

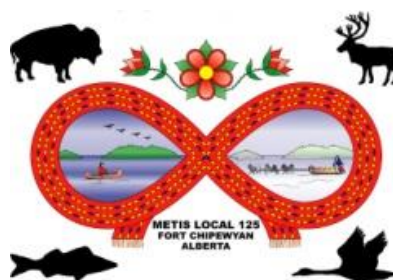
In light of the degraded health of the Park⁹ and the significant challenges identified by the World Heritage Centre and IUCN that undermine major components of the Wood Buffalo National Park Action Plan, we agree with the Draft Decision **44 COM 7B.190**, that there is a strong and well-supported case for inscription of the Property on the List of World Heritage in Danger until rapid conservation action is taken, and threats have been eliminated for this globally significant ecosystem.

Sincerely,

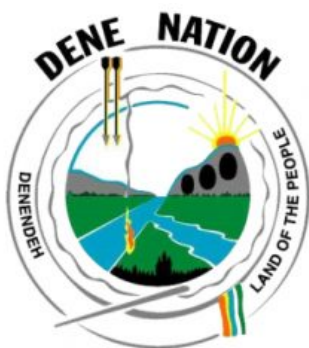
Smith's Landing First Nation



Fort Chipewyan Metis Association



Dene Nation



Assembly of First Nations Alberta Association



⁹ IUCN World Heritage Outlook 3, 2020. Gland, Switzerland. 90 p. <https://doi.org/10.2305/IUCN.CH.2020.16.en>

Indigenous Climate Action



National Audubon Society
Boreal Conservation



Wildlife Conservation Society Canada



Environmental Defence



Nature Canada



Indigenous Heritage Circle



Nature Alberta



Birds Canada



Dr. Brenda Parlee

Associate Professor, University of Alberta
Principal Investigator with Tracking Change



Dr. David Suzuki

David Suzuki Foundation



Dr. Martin Carver
 Researcher and Independent Hydrologist
 Aqua Environmental Associates

Canadian Freshwater Alliance



Alberta Wilderness Association



Alberta Wilderness Association

Mining Watch Canada



Keepers of the Water



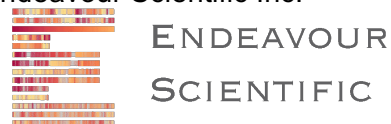
Cumulative Effects Environmental Inc.



The Council of Canadians



Endeavour Scientific Inc.



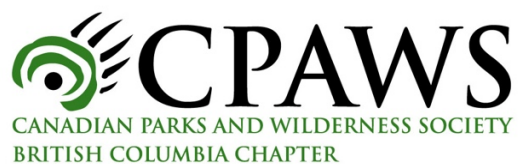
Canadian Parks and Wilderness Society
 (CPAWS) National



CPAWS - Northern Alberta Chapter



CPAWS - British Columbia Chapter



CPAWS – Northwest Territories Chapter

