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CANADIAN PARKS AND WILDERNESS SOCIETY
SOCIÉTÉ POUR LA NATURE ET LES PARCS DU CANADA

Ottawa Valley Chapter – Section Vallée de l'Outaouais
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November 2, 2026

Senator Mary Coyle
Chair
Standing Senate Committee on Energy, the Environment and Natural Resources
Senate of Canada
2 Rideau Street
Ottawa, Ontario K1A 0A6

Re: Bill S-229, An Act to amend the National Capital Act (Gatineau Park)

Dear Senator Coyle:

On behalf of the Ottawa Valley Chapter of the Canadian Parks and Wilderness Society (CPAWS-OV), we thank you and the members of the Standing Senate Committee on Energy, the Environment and Natural Resources for your thorough study of Bill S-229 and for the opportunity to appear before the Committee on October 20, 2026.

CPAWS-OV **strongly supports Bill S-229 as drafted at the time of our appearance**. We believe this legislation represents a long-overdue opportunity to provide Gatineau Park with the stronger and more durable legislative protection it deserves.

Bill S-229 would establish the park's boundaries in an Act of Parliament, make the protection of ecological integrity a central consideration in park management, prohibit the disposal of public lands within the park subject to limited exceptions, and strengthen collaboration with the Algonquin Anishinābeg Nation and neighbouring municipalities. These are important and necessary steps toward ensuring that Gatineau Park remains protected for future generations.

However, **we are deeply concerned that proposed amendments currently under consideration could weaken some of the very protections that make Bill S-229 so important.**

Proposed changes to the park boundary

While CPAWS-OV has not been provided with the final wording of amendments proposed by the Minister of Public Services and Procurement Canada, we understand that one proposed change would remove private properties from the legislated park boundary, effectively creating private enclaves within Gatineau Park.

We do not support this approach.

We believe these properties should remain within the park boundary, with their eventual acquisition by the National Capital Commission (NCC) occurring on a willing-seller, willing-buyer basis where appropriate.

Keeping these lands within the legislated boundary is important because the park must be managed as an ecological whole. Fragmenting the boundary by creating private enclaves risks

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undermining the integrity of the park and could create additional challenges for long-term conservation, ecological connectivity and effective park management.

The purpose of Bill S-229 is to strengthen Gatineau Park's protection. **We therefore urge the Committee not to consider amendments that would weaken the continuity and integrity of the park's legislated boundary.**

No net loss must mean no net loss of conservation value

We are even more concerned about the reported proposal to give the NCC authority to transfer or exchange lands within Gatineau Park, provided there is no net loss of the overall area of the park and vague, general biodiversity values.

CPAWS-OV does not believe that maintaining the same number of hectares is sufficient to protect Gatineau Park.

A hectare of mature forest, wetland, shoreline or other ecologically significant habitat cannot necessarily be replaced by a hectare of land somewhere else. The location, ecological function, connectivity and biodiversity value of land matter enormously.

For this reason, if the Committee wishes to retain any mechanism allowing park lands to be used for essential infrastructure or other exceptional purposes, it should require that any lands lost from the park be replaced with lands of **equal or greater ecological value**, not simply an equivalent number of hectares.

CPAWS-OV made precisely this point in our April 2026 brief to the Committee, recommending that lands required for infrastructure be replaced by lands of equal or greater natural value so that there is no net loss of natural area or ecological function.

The Committee should also carefully consider the consequences of allowing the NCC to exchange park lands without parliamentary approval.

Gatineau Park's existing boundaries were established for a reason. They encompass a complex network of forests, wetlands, lakes, waterways, habitats and ecological corridors. Particularly in the southern portion of the park, these lands are under significant development pressure and provide critical ecological functions.

We are concerned that an authority to exchange lands could, over time, result in a gradual **migration of the park's protected lands toward the north and west**, while environmentally significant areas in the southern portion are progressively exposed to development.

Lac des Fées and its surrounding natural areas provide one example of why this matters. The question is not simply how many hectares remain within Gatineau Park, but **which hectares remain protected and what ecological functions those lands provide**.

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Accordingly, CPAWS-OV recommends that:

- the NCC **not be granted unilateral authority to exchange or transfer park lands**;
- any permanent change to the legislated boundaries of Gatineau Park require **an amendment to the National Capital Act approved by Parliament**; and
- where land must exceptionally be removed from the park for essential infrastructure, the legislation require replacement with lands of **equal or greater ecological value**, accompanied by meaningful public and Indigenous consultation.

This approach would be consistent with the fundamental principle that Parliament, rather than an administrative body, should have the final authority to decide whether the legislated boundaries of Gatineau Park should change.

Indigenous rights, governance and co-management

CPAWS-OV also listened with great interest to the testimony of Kitigan Zibi Anishinābeg (KZA) Councillor Gilbert Whiteduck.

We strongly support a future model of **co-governance and co-management** that provides KZA with a meaningful role and voice in the governance and management of Gatineau Park.

Gatineau Park exists within the current and traditional territory of the Algonquin Anishinābeg. Any modern legislative framework for the park must therefore recognize and respect the rights, responsibilities, knowledge and relationship of the Algonquin Anishinābeg with these lands and waters. It has been well documented that lands and waters stewarded by Indigenous Peoples are healthier, more biodiverse and more resilient than those managed by non-Indigenous people.

We believe Bill S-229 should be implemented in a manner that strengthens—not constrains—the ability of KZA and other Algonquin communities to exercise their rights and responsibilities in relation to their traditional territories.

Nothing in Bill S-229 should prejudice, diminish or otherwise interfere with Indigenous rights or land claims. In particular, the legislation should not be interpreted in a manner that prejudices KZA's ongoing efforts to advance its land claim, including its interests in lands within Gatineau Park.

We also believe that Indigenous knowledge and western science should be brought together in the stewardship of the park. This is not simply a matter of consultation; it is an opportunity to establish a stronger and more effective model of conservation and governance for Gatineau Park.

A once-in-a-generation opportunity

The Committee has an important responsibility before it.

Gatineau Park is the most significant natural area in the National Capital Region. It provides habitat for wildlife, protects forests and watersheds, stores carbon, supports biodiversity and offers

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millions of people opportunities to experience nature. Its ecological importance extends well beyond its recreational value.

Bill S-229 provides Parliament with an opportunity to establish a stronger legislative foundation for the park.

We urge the Committee to ensure that this opportunity is not diluted.

CPAWS-OV respectfully recommends that the Committee:

1. **Recommend third reading of Bill S-229 with its core protections intact;**
2. **Reject any amendment that would create private enclaves within the legislated park boundary;**
3. **Reject any provision granting the NCC unilateral authority to exchange or transfer park lands;**
4. Where exceptional infrastructure needs require the use of park lands, require **no net loss of ecological value**, rather than simply no net loss of acreage;
5. Require **Parliamentary approval for permanent changes to the legislated boundaries of Gatineau Park**; and
6. Ensure that the legislation fully respects and supports **Algonquin rights, Indigenous governance and meaningful co-management with Kitigan Zibi Anishinābeg**.

The central question before the Committee is ultimately quite simple: **Will Bill S-229 provide stronger protection for Gatineau Park, or will it create new mechanisms through which that protection can gradually be weakened?**

CPAWS-OV strongly believes that the legislation must do the former.

We thank you and the members of the Committee for your careful consideration of this important legislation and for the time and attention you have devoted to the future of Gatineau Park. We remain available to provide any additional information, analysis or assistance that may be useful as the Committee completes its study and considers amendments to the bill.

Sincerely,

Soren Antosz
Chair, Gatineau Park Committee

John McDonnell
Executive Director