I am writing in support of the Gatineau Park Bill before your Committee.

In brief, my credentials are as follows: I retired from Parks Canada in 2014 as the Director General of National Parks. During my tenure, the current National Parks Act, which clearly states ecological integrity as a first principle of managerial decisions, was approved by Parliament. Upon my retirement, I served 8 years as the Chair of the World Commission on Protected Areas of the International Union of Conservation of Nature (IUCN). Of further note, I undertook the inventory of Gatineau Park's vegetation, which was published in 1974, when the Park was larger than its current configuration. The Ottawa Citizen has published three of my op-eds suggesting legislation for Gatineau Park. I am also a member of the CPAWS OV Gatineau Park Committee.

Accordingly, I would like to submit the following input to your deliberations:

The Minister of Public Services and Procurement Canada, in his appearance before your committee, suggested changes to the proposed legislation. One such change would remove private properties from the proposed park boundary, effectively creating private enclaves within Gatineau Park. Such a change would sets a precedent for carving up the Park's integrity. Excluding them from the park undermines its integrity and could create additional challenges for long-term conservation, ecological connectivity, and effective park management. As you know, the purpose of Bill S-229 is to strengthen Gatineau Park's protection. I would urge the Committee not to consider amendments that would weaken the continuity and integrity of the park's legislated boundary. These properties should remain within the park boundary, and while retaining private property rights, their eventual acquisition by the National Capital Commission (NCC) should be on a willing-seller, willing-buyer principle, where appropriate.

The Minister also suggested that the NCC be given the 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. Hectare-for-hectare transfers are problematic. Such a basic principle is not sufficient to protect Gatineau Park. A hectare of 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, any mechanism allowing park lands to be used for essential infrastructure or other exceptional purposes must 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. Essentially, any 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.

Finally, and perhaps most importantly, is that the authority for exchanging or divesting lands from within the Park boundary should reside with Parliament and not with the NCC. This requirement is parallel to the obligations for Parks Canada under the National Parks Act. The question is not simply how many hectares remain within Gatineau Park, but which hectares remain protected and what ecological functions those lands provide. No less than the expectations under the National Parks Act, there must be direct oversight by Parliament.

Specifically,

- the NCC must **not** be granted unilateral authority to exchange or transfer park lands;
- any permanent change to the legislated boundaries of Gatineau Park must 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 must 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.

If you wish to discuss further, I am at your disposal.

Nikita Lopoukhine