



WERAC
Wilderness and Ecological
Reserves Advisory Council



BUILDING A FOUNDATION FOR A HOME FOR NATURE:

WERAC RECOMMENDATIONS REPORT ON THE PROTECTED AREAS
PLAN FOR THE ISLAND OF NEWFOUNDLAND

A Report submitted to the Honourable Minister Bernard Davis,
Department of Environment and Climate Change on May 20, 2021.

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PLAN FOR THE ISLAND OF NEWFOUNDLAND

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Front Cover: Eastern Hyperoceanic Barrens natural region - Erika Pittman
Back Cover: Highlands of St. John Proposed Reserve - Tina Leonard

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Introduction

I am speaking of the life of a man who knows that the world is not given by his fathers, but borrowed from his children; who has undertaken to cherish it and do it no damage, not because he is duty-bound, but because he loves the world and loves his children..."

- Wendell Berry

(The Unforeseen Wilderness: An Essay on Kentucky's Red River Gorge, 1971)

The beating heart and soul of the Island of Newfoundland has always been its natural world. That deep connection has been defined by the geology, climate, plants and animals. It has formed our rich culture and our language. It has given us freedom to explore our natural world, warmed our houses and put food on our plates.

Our relationship with nature has also sometimes been a troubled one. From the collapse of the cod fishery, to the extinction of the Newfoundland Wolf and the Great Auk, we have not always been able to protect nature as well as perhaps was needed. We have built roads crisscrossing the Island and converted land to meet our needs without considering large-scale conservation planning or protection of our many unique landscapes. Much of the Island has been disturbed and degraded, or set aside for resource development.

This degradation of intact landscapes, together with biodiversity loss and climate change, is putting our traditional way of life, and our children's and grandchildren's futures, in jeopardy. We have reached a point whereby only timely intervention can ensure the protection and survival of our wildlife and our remaining intact ecosystems. To protect these remaining intact ecosystems, the Government of Newfoundland and Labrador must implement a system of protected areas now. The people who live here also need wild spaces, and a decision to protect these areas will create a sustainable future for our children, and their children. This Recommendations Report outlines a path forward for the Government of Newfoundland and Labrador to establish a system of protected areas grounded in science, local and Indigenous knowledge and perspectives. The recommendations outline steps to implement a Plan for the Island of Newfoundland, and to begin developing an inclusive process for Labrador conservation planning.

These recommendations urge the Government of Newfoundland and Labrador to take transformative action to implement a network of protected areas for the province in a comprehensive, transparent, and respectful way. Protected areas have proven to be important drivers of rural economic development around the world. This is also true in Newfoundland and Labrador, where protected areas like as Gros Morne National Park have significantly and positively impacted economic development in rural communities. Government must provide the adequate means and financial resources to implement and support such a network and ensure that our protected areas shelter our biodiversity from threats, support traditional activities, and diversify the economies of rural communities.

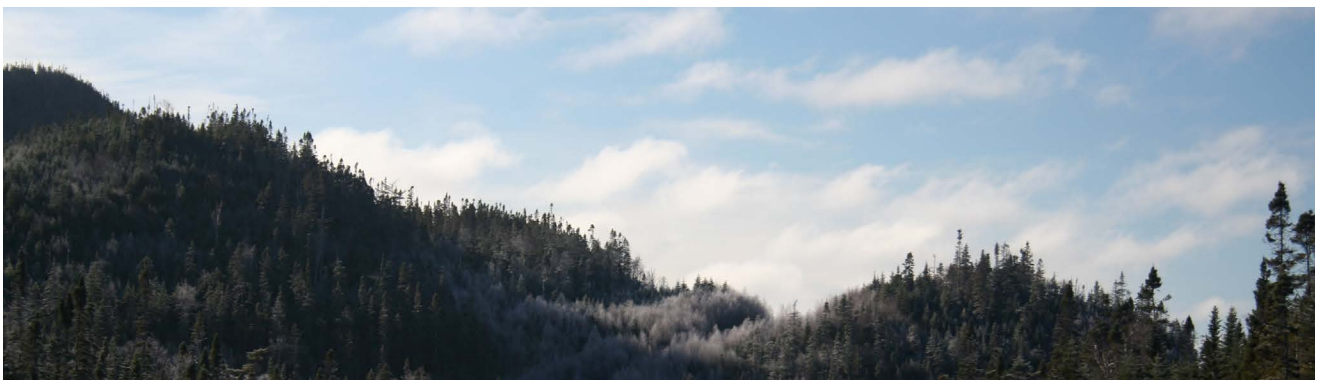
Background

The Wilderness and Ecological Reserves Act (WER Act) came into effect in 1980. At that time, there was a growing recognition that wilderness was disappearing across the province. Many species were in decline, and did not have adequate protection from habitat destruction. The WER Act was written to address those impacts.

The Act recognizes the continuation of traditional activities in reserves and requires public consultation as part of the reserve establishment process, and again before changing management or boundaries of a reserve. The WER Act also mandates the creation of the Wilderness and Ecological Reserves Advisory Council (WERAC). This volunteer advisory body is appointed by the provincial government to provide advice to government on establishment, and management of wilderness and ecological reserves in Newfoundland and Labrador.

The Protected Areas Plan for the Island of Newfoundland was developed by the Government of Newfoundland and Labrador, and has quite a long and storied history. The Province began drafting the Plan (generally referred to as the Natural Areas System Plan or NASP) in 1994. As part of this effort, a Provincial Protected Areas Strategy was developed that still underpins provincial protected area planning to this day. Preliminary work focused on the Island, and a suite of protected areas was chosen and proposed by an inter-agency System Plan Committee. The committee included a diverse team of experts drawn from government, academia, and the non-governmental organization sector. In 1996, this suite of proposed protected areas was presented to NL Cabinet and the areas were granted 'interim protection' in 2000.

From 2000-2018, numerous attempts were made to reconcile competing land use interests for the suite of proposed reserves. The Conflict Resolution Committee (2002-2003), NASP Coalition (2004-2005), the NASP Deputy Ministers Steering Committee and Interdepartmental Working Committee (2006-2008), the Ministers of Environment and Conservation and Natural Resources (2010), the NASP DM Steering



Lloyd's River - Erika Pittman

Committee again in 2016, and, in recent years, various ongoing informal committees with forestry and mining departmental representatives have all attempted to minimize potential economic impacts and protect important natural features. Throughout these processes, the boundaries for areas proposed in the Plan were changed, and entire areas removed, or relocated to accommodate industry such as forestry, mining and petroleum interests. Areas were also added in response to evolving conservation planning criteria. Maps in Appendix A outline some of the key stages of Plan development.

In 2019, the Plan was circulated to government departments for review. The content of the Plan presented for interdepartmental review was the same as is presented in *A Home for Nature: Protected Areas Plan for the Island of Newfoundland*. In December 2019, WERAC wrote the Premier and encouraged him to implement the Plan as soon as possible. When this letter was met with no response, two members of WERAC resigned in protest and engaged the media. Their resignations brought the Plan into the public eye for the first time.

Shortly afterward, the Minister of Fisheries and Land Resources (the department responsible for WERAC at the time) directed WERAC to release the Plan to the public for a 30-day consultation and report back to government. WERAC appointments expired a few months later, so time to complete the consultation was limited. An in-person media event was planned for March 19, 2020. On March 13, 2020, however, the province was thrust into lockdown due to COVID-19, delaying the release of the Plan. On May 28, 2020, the Plan was released on engageNL.ca for a 30-day consultation period.

Widespread misinformation, a lack of government communication and logistical support, lapsing WERAC appointments, a departmental move and the COVID-19 health pandemic all significantly affected the rollout, and how the public perceived the Plan. The Plan was presented by the responsible Minister as 'WERAC's Plan' rather than a plan generated by government. In the media, WERAC was presented as developing the Plan as an environmental lobby group rather than a volunteer government-appointed council under the WER Act. Misleading statements by elected officials at the time continue to have long-lasting consequences.

When there was a public outcry about the short consultation period, the then Minister of Fisheries, Forestry and Agriculture waived the 30-day reporting period and asked the Council to extend their consultation so that everyone had time to participate. The Minister also extended the Council member appointments until the Recommendations Report could be submitted to government.

A more detailed history of the development of the Protected Areas Plan for the Island is in Appendix A. For more information on the consultation process and the submissions received, please see below and the *What We Heard* public document in Appendix B.

Status of Intact Landscapes on the Island of Newfoundland

The dominant threats to biodiversity, from both a global and provincial perspective, are habitat loss, degradation and fragmentation, driven by change in land use as intact natural landscapes are converted to industrial activities (Newbold et al., 2015). This is also true in Newfoundland, where habitat loss is a significant threat to iconic species-at-risk such as caribou and the Newfoundland marten, or endangered plants of the limestone barrens ecosystem.

Over the past 30 years, as the Protected Areas Plan was being drafted and debated within government, resource and agricultural developments have continued to expand across the Island. As a result, fewer and fewer intact landscapes are left. Many of Newfoundland's forests are dissected by roads, trails and transmission lines, or directly affected by forestry, agriculture, mining and quarry exploration, and petroleum developments. This expansion has left very few areas of the Island free from industrial and agricultural development pressure, including road development that allows increased access for other activities.

A human footprint analysis distinguishes areas that are wilderness from areas that have been altered by developments such as logging, mining, quarries, and conversion to agriculture (habitat loss) or activities such as building roads, power lines, and mineral/petroleum exploration that involves cutting seismic lines (habitat fragmentation). A Human Footprint Analysis was completed for the Island of Newfoundland in 2013. In 2020, additional mapping was developed to illustrate the development considerations for the areas proposed in the Protected Areas Plan. This Human Footprint/Development Considerations Map Series (see Figures 1 and 2 below) uses newer data and different methodology compared to the 2013 Human Footprint Analysis. These maps include all active and historical mining claims as part of the human footprint, because the methodology for choosing candidate sites for the NASP included avoiding (as much as possible) areas of interest to the forestry, minerals, and petroleum industries. More detailed maps are included in Appendix C.

These maps show that very few roadless areas on the Island remain that could be considered as candidate sites for wilderness and ecological reserves. In fact, many of the areas that have not been subject to extractive or intrusive industrial development remain intact precisely because they had received interim protection in 2000. Having waited so many years to create a system of protected areas on the Island, the Government of Newfoundland and Labrador has lost many of the best options to protect and conserve natural areas.

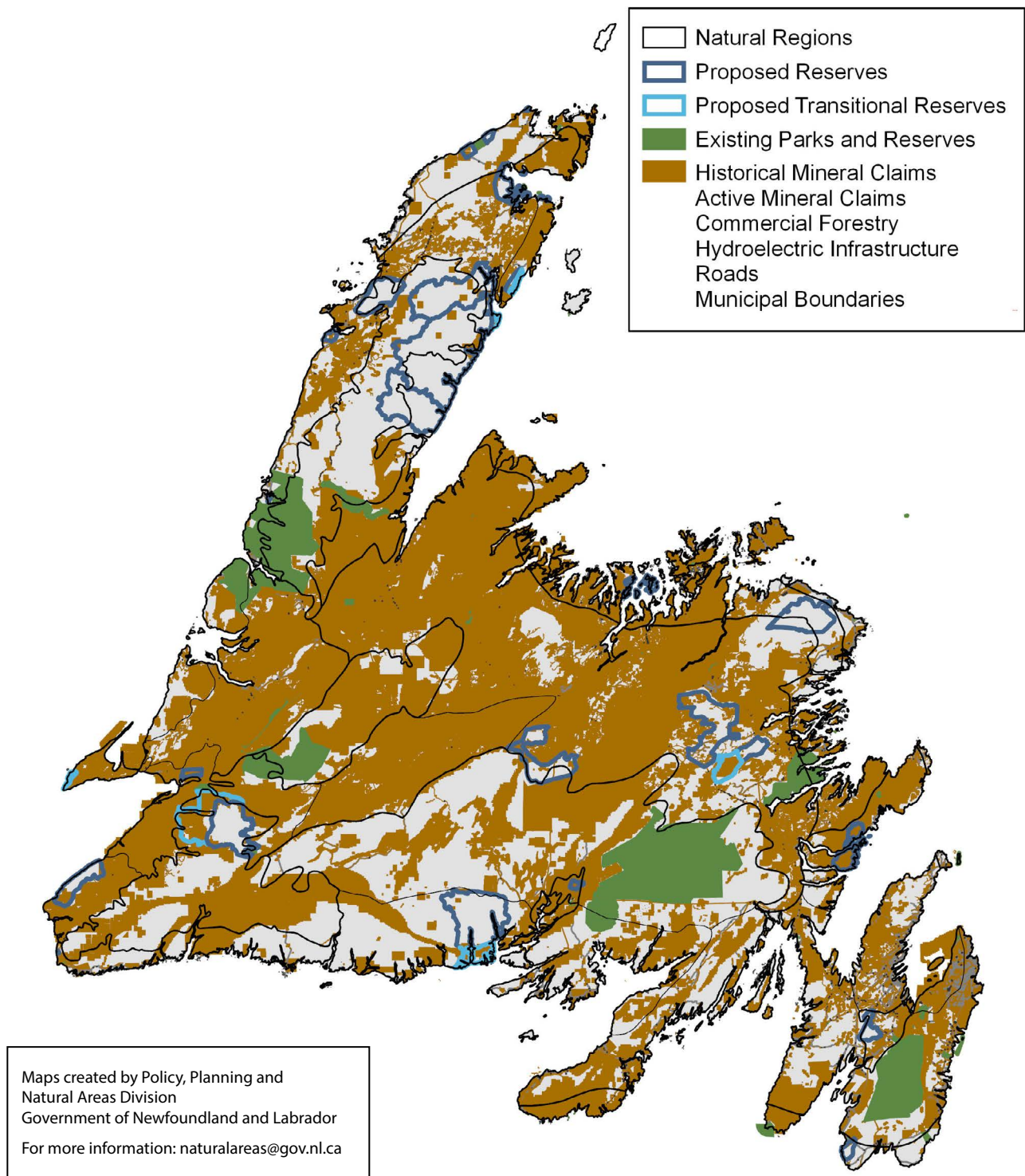


Figure 1. Human Footprint Analysis/Development Considerations for the Island of Newfoundland (Overview 1), 2020 (with no buffer on development), including ecoregions and subregions, including and combining all land uses (active and historical mining claims, forestry, hydroelectric infrastructure, roads and municipal boundaries).

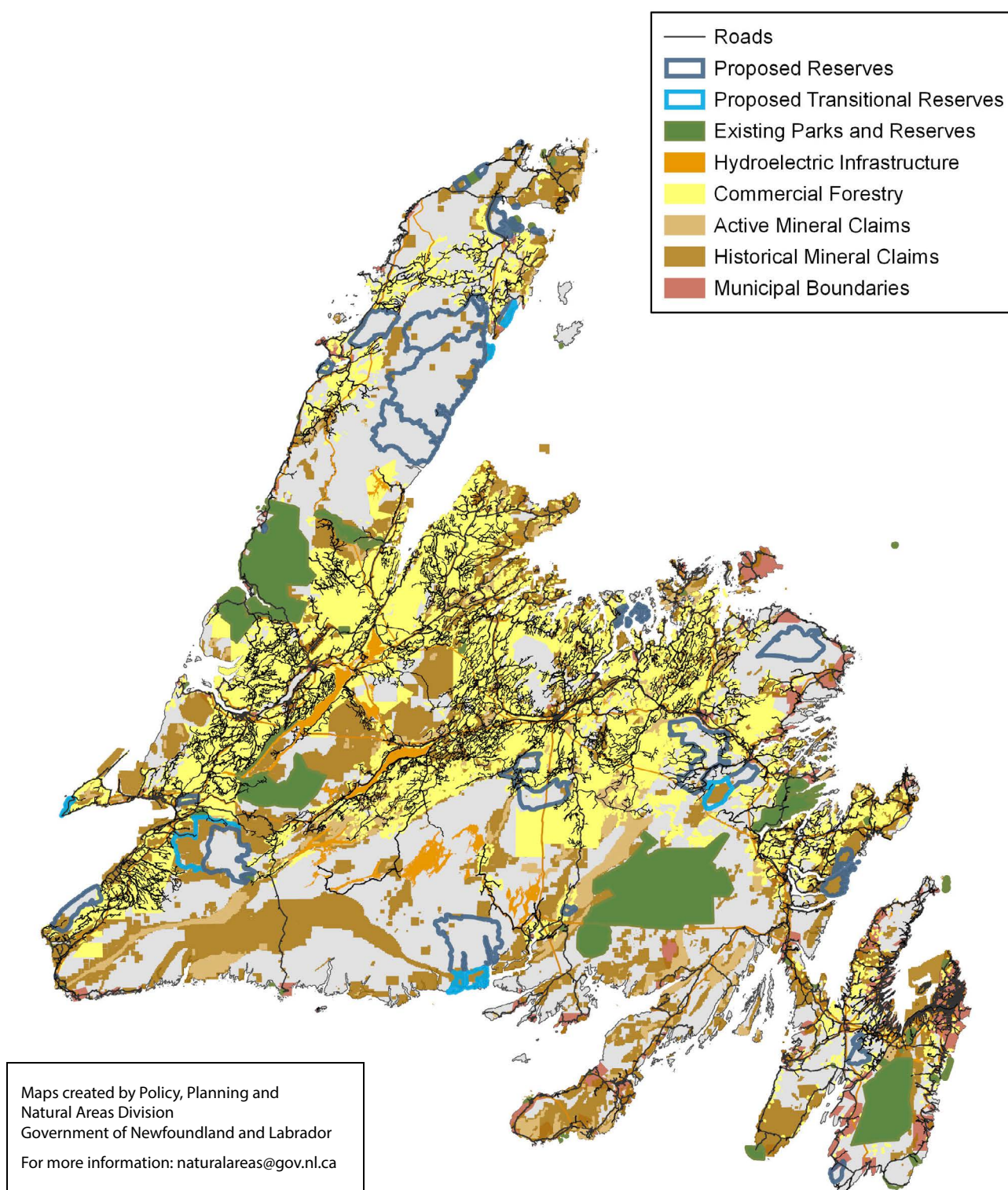


Figure 2. Human Footprint Analysis/Development Considerations for the Island of Newfoundland (Overview 2), 2020 (with no buffer on development), including existing and proposed protected areas, and all land uses (active and historical mining claims, forestry, hydroelectric infrastructure, roads and municipal boundaries). Grey denotes land with negligible development or for where no data are available.

The Public Consultation and What WERAC Heard

Over the consultation period (May 28- October 1, 2020) WERAC received thousands of comments with a wide range of opinions. Many people spoke of a love of nature and a need for more protected areas. At the beginning of the public consultation, however, responses were dominated by misinformation and negative comments. There were many misunderstandings about WERAC, the Plan, the consultation process and reserve management. Some of these common misconceptions are outlined in Appendix D.

In an effort to directly engage the public about the Plan, the Council sent out supplementary information, met virtually with people, organizations, town councils and MHA's, responded to emailed questions, and talked to the media. From these meetings, it became clear that peoples' interpretation of misinformation that was widely communicated across various media was a large part of the initial criticism.

Despite the initial challenges associated with the consultation process, the majority of respondents support moving forward with local public consultations (Phase 2) and establishing a Protected Areas Plan for the Island of Newfoundland. The responses show that there was both support and opposition in each region of the Island. There were also common concerns about nature conservation, the Plan, reserve management, and specific proposed reserves. These concerns showed that considerable common ground exists among supporters and opponents of the Plan as presented to the public in 2020. The most numerous submissions against the Plan were from people concerned about loss of the ability to perform traditional activities. It is WERAC's assessment that many of these concerns can be addressed during the Phase 2 consultations and establishment process and through appropriate management. For example, there was less support for proposed protected areas on the Great Northern Peninsula, with many concerns stemming from a fear of loss of traditional activities, perceived negative economic impacts or potential impacts on firewood collection. Interestingly, a recent report indicated that the Great Northern Peninsula is one of the provincial and Canadian hotspots of endemic biodiversity, and is in desperate need of protection (Enns et al., 2020). Through the normal public consultation process for individual proposed reserves, the public can consider whether a reserve would work for local people, propose revised boundaries, and reserve management approaches.

This Recommendations Report includes recommendations specific to future public consultations and management of new reserves. All comments received in Phase 1 consultations have been analyzed and reported in the What We Heard document (Appendix B). A Summary of the What We Heard is included below.



WERAC

*Wilderness and Ecological
Reserves Advisory Council*

What We Heard Summary:

Public Opinions on the Protected Areas Plan for the
Island of Newfoundland



Little Grand Lake Provisional Ecological Reserve
Photo credit: Joe Brazil

The Wilderness and Ecological Reserves Advisory Council (WERAC) launched Phase 1 of the public consultation for the Government of Newfoundland and Labrador's Protected Areas Plan for the Island of Newfoundland, titled A Home for Nature on May 28, 2020. The consultation closed on October 1, 2020. This summary presents the more common points of view sent in by the public. For the full What We Heard Report, please visit: www.gov.nl.ca/HomeforNature.

WERAC received 898 unique written responses, 633 of which were from Newfoundland and Labrador residents, 36 from outside Newfoundland and Labrador, and 229 that did not specify residence. Opinions from the unique responses are described in more detail below.

WERAC received an additional 996 form letters in support of the Plan and moving forward with Phase 2 (local public consultations). A total of 130 form letters were sent in by Newfoundland and Labrador residents, 734 were from outside Newfoundland and Labrador, and 132 didn't specify residence. Government also shared a petition with WERAC that outlined concerns with the proposed Plan. The petition had 4,582 signatures, 1,482 of which were from Newfoundland and Labrador, and 3,100 were from outside Newfoundland and Labrador. The petition expressed concerns about the process to come up with the Plan and recommended inclusive public consultations be conducted in future protected areas planning. The petition also asked for the data used to select areas to be made public. For more information on how areas were selected, please visit: www.gov.nl.ca/HomeforNature.

How Much Support is There?

Of the 898 unique submissions, the majority (56%) of respondents supported the Plan to some extent: 41.8% supported the Plan as a whole, while 14.2% of supporters had some reservations, or mentioned support only for specific reserves. Of those that did not support the Plan (44%), respondents were either against the Plan generally (24.9%), or against protecting specific proposed reserves or a region (19.1%). In the Great Northern Peninsula-Baie Verte region, support for the proposed Plan was lower, with 68% either against the Plan as a whole, against protecting the region or specific reserves.

The Basics

The majority of respondents support the Plan to some extent. Many want more protected area than is currently proposed, while others think too much area is being proposed.

Some respondents said they believed that existing legal protection or local stewardship is enough to protect the land. Others see the Plan as a way to protect wildlife, or rare or endangered species, and their habitat. Support for the Plan and concerns vary by region.

Many people want to continue traditional activities in the proposed reserves and continue to use and maintain their cabins. The impact of reserves on the future rural economy is viewed as both a concern and an opportunity.

People want to move forward with local public consultations (Phase 2) and provide more education and improved communications in developing boundaries and how reserves are managed.

Regardless of support level for the Plan, respondents communicated a deep love of and respect for the land, and nature.



In some cases, people explained why they did or did not support the Plan. Many people, both for and against the Plan, worry that they might lose the ability to continue traditional activities or access resources necessary for food or heating (17.7%).

Some people also commented that they believed that local stewardship or existing legislation was sufficient to protect the land (10.8%). Equally, people commented that the proposed reserves are a way to protect wildlife, rare or endangered species, and habitats (10.7%).

The following sections describe the most common perspectives received. For a more detailed summary of the various perspectives, please see the What We Heard document.

The Content of the Plan

The greatest advice that people had regarding the content of the proposed Protected Areas Plan was that more land needs to be proposed for protection (18.9%). Some respondents (9.9%) proposed additional areas. Maps of proposed areas are available in the What We Heard document. There were also people (6.9%) who believed that too much area was being proposed in the Plan. Other common recommendations were to protect more remote areas instead, and to consider including more coastal and marine areas.

Reserve Management

For many respondents, it is important that any future reserves allow traditional activities to continue. People wanted fishing, hunting, and trapping to be permitted (31.2%). Snowmobiling, either on trails or generally, was also mentioned as an important activity (17.7%). The ability to use, maintain, access, and sell cabins was a common concern (13.7%).

Other common recommendations were to allow non-motorized activities (such as biking, hiking, and swimming), allow collection of firewood, and allow berry picking or other foraging. There were conflicting views on how ATVs should be managed.

The Process

The consultation process is in two phases. Phase 1 is the initial consultation that this summary reports on. Once directed by government, Phase 2 will include local public consultations on each proposed reserve. Across all regions, respondents wanted the government and WERAC to undertake a more inclusive public consultation process (15.3%), improve education and communications (9.5%), and implement the Plan as quickly as possible (4.9%). People were also concerned that Indigenous peoples and communities that would be most affected by the proposed reserves were not included in drafting the proposed boundaries. There was also notable support (45%) mentioned for moving forward with local public consultations (through Phase 2). The form letters and the petition also recommended local public consultations and an inclusive public engagement process in general for protected areas planning.

Common Ground

There are differences of opinion regarding the Plan, but also plenty of common ground. Many respondents, both those in support and against the Plan, communicated a deep love of and respect for the land, and nature. Regardless of the extent to which people supported the Plan, many people commented on the importance of supporting local economies, food security, traditional uses, and finding opportunities to support the survival of rural communities.





Bay du Nord Wilderness Reserve
Photo credit: Tina Léonard



Little Grand Lake Provisional Ecological Reserve - Erika Pittman

WERAC Recommendations

In developing the recommendations presented in this report, WERAC was guided by the best available conservation science, public input received during public consultations, and the expert knowledge and experience of each Council member.

Overarching guidance includes:

- A commitment to transparency of process.
- A commitment to ensure that the process remains driven by science and traditional or Indigenous knowledge.
- A recognition that the biodiversity and climate change crises will shape our future and that protected areas are an important nature based solution to mitigate impacts.
- A commitment to meaningful engagement.
- A commitment to national and international protection goals.
- A recognition of our responsibility to protecting our natural heritage for the love of our land and our children.
- An understanding that protection can and will lead to long-term sustainable economic opportunities.
- A recognition that success will only come with public and institutional support and engagement.
- An awareness that time is of the essence. Many protection options have been foreclosed as resource development has expanded over the past 25 years.

The intent is that these recommendations inspire and guide government's path forward with respect to the conservation of our province's unique natural heritage.

Key Recommendation

Implement a comprehensive and connected system of protected areas for Newfoundland and Labrador

Now is the time for the Government of Newfoundland and Labrador to take a leadership role in moving the province forward with protection of natural areas. Ultimately, nature is a public trust, and its protection is a public responsibility. We must all act as stewards of the land, on behalf of our children and grandchildren, neighbours, province, country, and the world. Without adequate protection, our remaining wilderness and natural spaces will continue to be degraded over time by industrial and other developments, and climate change. This is where the WER Act can make a difference.

Wilderness and ecological reserves are the primary and critically important tool in achieving ecological conservation and sustainability in our province. However, reserves alone will not ensure long-term survival of species and ecosystems, and must be part of a comprehensive protected area network, alongside other protective legislation (such as the Endangered Species Act). A network of functionally-connected protected areas will help us attain a sustainable and equitable future for our people and our flora and fauna. The 2021 Speech from the Throne spoke of the need to support sustainable communities, address climate change, take action on Indigenous reconciliation, and work to make Newfoundland and Labrador a healthier place to live. Protected areas aid in climate change mitigation, help avoid further biodiversity loss and enhance biodiversity, protect traditional and cultural activities and culturally important lands, improve food security, conserve critical ecosystem services for communities (e.g., clean drinking water, flood control), encourage sustainable economic development, and support the mental and physical health of Newfoundlanders and Labradorians (Girardin et al., 2021).

There is support for implementing the Protected Areas Plan and for protected areas in general. As shown in the What We Heard document, 56% of unique submissions were in support of the Plan, and there was both support for, and opposition to the Plan in all regions of the Island. An additional 996 form letters expressed support for the Plan. While the petition did not support the Plan as it has



been presented, concerns were focused on the process and the need for public consultations in local communities, and not on the concept of creating new protected areas in our province.

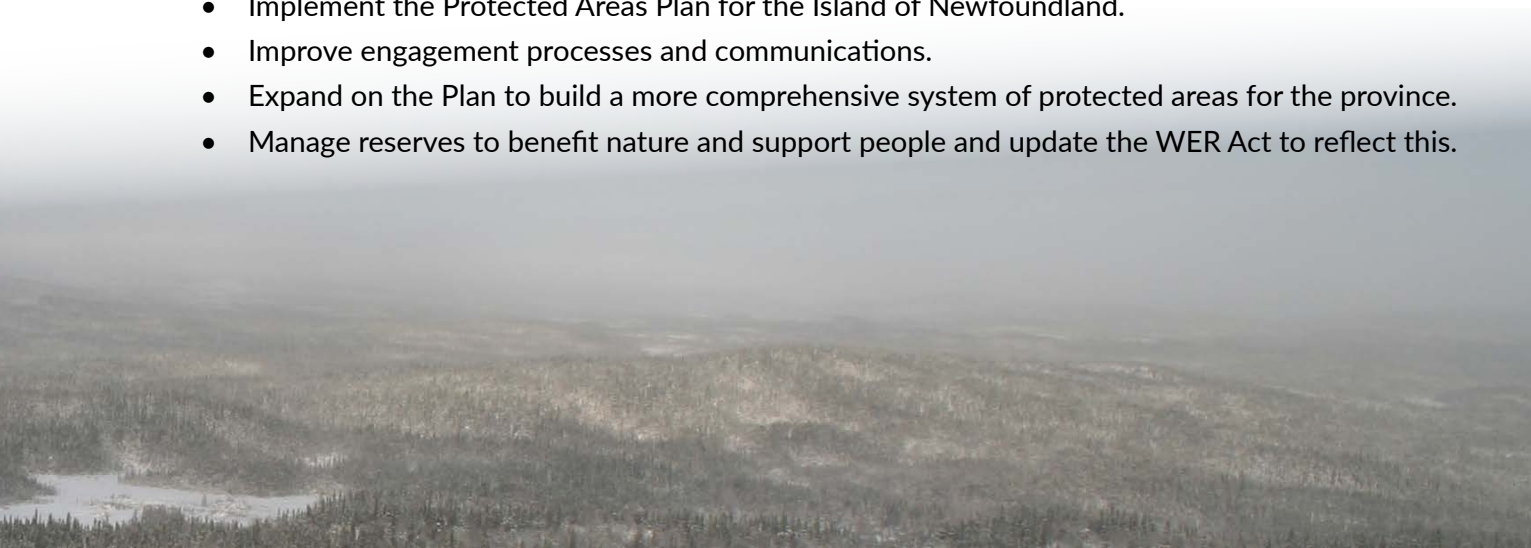
Currently we have less than 7% of the province's land mass protected. If fully implemented, the Protected Areas Plan would increase Island protection to 13.2% and provincial protection to 8.7%; still the 3rd lowest amount of land protected in Canada.

To play our part, we must do better. There are scientifically-based, legally-binding national and international targets for protected areas that should guide us (11% of respondents mentioned this). These targets represent how much land needs to be protected in order to halt the threats that cause biodiversity loss and ensure species at risk can return from the brink of extinction.

At the time the Plan was initiated, the Canadian and International target was protection of at least 12% of land and inland waters. The target increased to 17% by 2020 at the 2009 Aichi conference of the signatories to the legally-binding Convention on Biological Diversity, as is reflected in Canada's Target 1 commitments. Now, national and international targets are 25% by 2025 and 30% by 2030. The increase in protected area targets is a response to the increasingly dire situation facing global biodiversity. Our province must be part of the solution.

The key recommendation to implement a comprehensive and connected system of protected areas for the province is supported by 15 additional recommendations outlined below. Each of these supporting recommendations includes rationale and actions. The 15 recommendations are organized by the following four themes:

- Implement the Protected Areas Plan for the Island of Newfoundland.
- Improve engagement processes and communications.
- Expand on the Plan to build a more comprehensive system of protected areas for the province.
- Manage reserves to benefit nature and support people and update the WER Act to reflect this.



Ecoregion 2A- Jeri Graham

Key Recommendation

Implement a comprehensive and connected system of protected areas for Newfoundland and Labrador.

Implement the Protected Areas Plan for the Island of Newfoundland	Improve engagement processes and communications	Expand on the Plan to build a more comprehensive system of protected areas for the province	Manage reserves to benefit nature and support people, and update the WER Act to reflect this
<p>1: Develop an Implementation Plan.</p> <p>2: Ensure that proposed reserves are protected during the implementation process.</p> <p>3: Move forward with comprehensive public consultations.</p> <p>4: Work together to find solutions to protected areas planning conflicts.</p> <p>5: Support the creation of transitional reserves as described in the Plan.</p>	<p>6: Engage Indigenous groups in a meaningful protected areas planning process.</p> <p>7: Improve transparency, communications, and education.</p> <p>8: Endorse protected areas as part of the climate change solution.</p>	<p>9: Expand on planning efforts to reach current conservation targets and broaden the Plan to include additional areas and protect other values.</p> <p>10: Improve protected area and landscape connectivity.</p> <p>11: Consider other protective mechanisms.</p> <p>12: Develop a collaborative conservation planning process for Labrador.</p>	<p>13: Invest in rural communities, sustainable rural economic development, and reserve management.</p> <p>14: Support reserve management that protects nature and local traditions.</p> <p>15: Modernize the WER Act.</p>

Implement the Protected Areas Plan for the Island of Newfoundland

Supporting Recommendation 1: Develop an Implementation Plan.

Haphazard implementation will take longer and be less efficient economically than a well-planned and well-timed rollout. We must find efficiencies where possible to implement and expand on the Plan as quickly and effectively as possible if we are to make progress towards national and global targets in a timely fashion. In response to the global biodiversity crisis, Canadian protected areas targets continue to increase nationally and internationally (eg. 25% by 2025 and 30% by 2030). Even with the proposed Protected Areas Plan, Newfoundland and Labrador lags far behind other jurisdictions. Establishment of all the proposed areas within the current Plan would bring the Island of Newfoundland up to 13.5% protection, which lags behind what science-based information indicates is necessary to mitigate the climate and biodiversity crises. An efficient Implementation Plan will enable government to catch up (as quickly as possible) to other jurisdictions and move the province closer to meeting current targets.

1. Create capacity to implement the Plan and develop an Implementation Plan for the Protected Areas Plan for the Island of Newfoundland.
 - 1.1 Establish a fast-tracked timeline for the implementation process. Highest priority sites (according to WERAC priority site selection methodology) should be started within one year of government approval to move forward with Phase 2 consultations and all the regional establishment processes started within the next 5 years.
 - 1.2 Provide funding to double Natural Areas Program staffing (to 8) to develop capacity to move forward with implementation for planning processes.

Supporting Recommendation 2: Ensure that proposed reserves are protected during the implementation process.

Reserve establishment takes time. Industrial and other developments of Crown land are ongoing across the province. In the decades since the Protected Areas Plan (NASP) was first proposed, many of the sites originally suggested as alternates have since been developed and site integrity has been significantly degraded; many of those areas no longer meet the criteria for protection as ecological reserves. This is reflected in the lack of area proposed for protection in the Red Indian Lake Subregion, Central Newfoundland Forest natural region. In this natural region, the only area proposed for protection was removed (in 2017) to accommodate proposed lumber extraction, and there were no suitable alternatives for protection, which strikes at the heart of the problem if we further delay.

2. Proposed reserves need to be protected from development during the implementation process. Proposed protected area boundaries need to be publicly available during all planning and protected from further development while Phase 2 consultation and establishment is in progress.
 - 2.1 Establish the proposed areas immediately as ‘interim protected’ areas under a placeholder legislation (i.e. Section 8 of the Lands Act). Such a designation should make allowances for existing activities (e.g., hunting and snowmobiling) to continue while public consultations continue and progress.
 - 2.2 Maintain interim protection for Red Bay Barrens proposed reserve in southern Labrador until a comprehensive conservation plan for Labrador is implemented. This area was included among the areas granted interim protection in 2000 by NL Cabinet.

Supporting Recommendation 3: Move forward with comprehensive public consultations.

One of the strongest messages from the public is that they wished for more engagement prior to the Plan being released. The public is looking for a lot more consultation in future protected areas planning efforts. One main thrust of the petition was to “encourage government to do proper consultation on any further plans”.

Consultation efforts must consider diverse input from local residents and all citizens of the province. People who live next to proposed protected areas have a special connection and a responsibility to the area. The consultation process for each proposed reserve needs to effectively engage people living next to proposed reserves in considering reserve boundaries and how proposed reserves will be managed. This includes consideration of longer-term management decisions once reserves are established. The Phase 2 consultation process is used to determine if and how a reserve can work for local residents and it is important to recognize that each consultation process may or may not lead to a reserve being established.

3. Expand and improve provincial and WERAC engagement capacity for the Phase 2 consultation.

- 3.1 Hold regional consultations to reduce the time it takes to establish new protected areas. Bundle together consultation processes for proposed reserves in close proximity and a similar level of public support where possible (such as Halls Gullies and Ripple Pond).
- 3.2 Explore establishing local or regional citizens groups to partner with WERAC in the public consultation process. Consider hiring external facilitators. Such committees could help form an approach to engaging local people in the development of a management plan for a reserve. Representatives from local committees could eventually become regional management advisory committees. Provide funding for logistical support for these groups.
- 3.3 Ensure WERAC has full membership that includes representation of all regions of the province.
- 3.4 Provide additional government staff and necessary funding to enable a more collaborative public engagement process, a reasonable reserve establishment time period, and, ultimately, the successful establishment of additional protected areas.
- 3.5 Develop a Consultation Plan for each reserve establishment that, in addition to local public consultations, provides an opportunity for all citizens of the province to be engaged in the public consultation process if they so choose.
- 3.6 New publicly proposed areas (as outlined in the What We Heard Report in Appendix B) in proximity to those outlined in the Plan should be considered as well during Phase 2 public consultations. Develop a public release showing the additional proposed reserves identified during the public consultation process, and explain that, where feasible, these areas will be

considered as part of the Phase 2 implementation and consultation process. For example, if a newly proposed area is adjacent to a reserve or reserves proposed under the Plan, the consultation for the new proposed area can be undertaken as part of that 'bundled' public consultation. See Supporting Recommendation 9.3 for more information.

Supporting Recommendation 4: Work together to find solutions to protected areas planning conflicts.

Natural areas protection, biodiversity conservation, and climate change mitigation must be priority mandates for government and across all departments. Government departments need to work together to consider and meet all mandates. Protected areas and conservation must be made equal priorities to other forms of economic development. Protecting land and wildlife is an investment, not a sacrifice or an economic hardship. Internal governmental collaboration is crucial to moving forward effectively with conservation planning in Newfoundland and Labrador.

4. Take a more collaborative problem-solving approach that identifies multi-mandate synergies, and prioritizes the protected areas mandate.
 - 4.1 Make the protected area system planning mandate a consideration and priority for every department when resource developments are considered.
 - 4.2 Establish a collaborative interdepartmental/external committee with the direction to consider all land planning values and provide direction on how and where to prioritize conservation measures. Include representation from government departments, WERAC, conservation science and land-use planning expertise. Empower the working group to consider a number of government mandates and recommend new reserves and boundary revision solutions. This process must consider high-priority sites first with revised boundaries then to be included in the Phase 2 consultation process (as per WERAC's Report on Criteria Development for Prioritizing Sites, 2015).

Supporting Recommendation 5: Support the creation of transitional reserves as described in the Plan.

Transitional reserves, although not perfect for either protected areas or the mining industry, provide recognition of the proposed areas as important to both the mining industry and ecological representation. From a conservation perspective, it would be better to include them now with the current establishment process, than to leave them out of protected areas planning. In the absence of agreement between conservation and mining priorities, transitional reserves are proposed as an alternative to full reserve establishment for areas of overlapping priority mineral or petroleum exploration and natural values. They are intended as a short-term measure. WERAC received submissions expressing concerns about the danger of establishing transitional reserves and not following through with WER Act protection in a timely manner, as happened with Middle Ridge Wildlife Reserve (see Supporting Recommendation 9.6). These transitional reserves are of high ecological importance, with limited or no presence of those features in an intact landscape elsewhere in the region. The Plan outlines a time-limited process for resolving conflicting priorities for these important and unique landscapes.

5. Proceed with the transitional reserves concept as presented in the Plan.

- 5.1 Acknowledge that transitional reserves are intended as a short-term measure and commit to protection of these areas under the WER Act where no significant mineral or petroleum discovery has been made within 10 years.
- 5.2 Establish these areas as transitional reserves under the Lands Act to ensure that the areas receive protection under legislation and their boundaries are publicly available.

Improve engagement processes and communications

Supporting Recommendation 6: Engage Indigenous groups in a meaningful protected areas planning process.

Protected areas establishment needs to move forward in the spirit of reconciliation with Indigenous Peoples as outlined in the United Nations Declaration on the Rights of Indigenous Peoples. The Government of Newfoundland and Labrador should engage and support Indigenous-led conservation wherever appropriate.

6. Immediately initiate a process for the collaborative engagement of Indigenous Peoples in future protected areas processes.
 - 6.1 Revise the WER Act to include Indigenous groups with a view to future protected area establishment and encouragement of Indigenous-led conservation.
 - 6.2 Direct WERAC to adopt previously Indigenous-identified areas in the province for inclusion in conservation planning.

Supporting Recommendation 7: Improve transparency, communications, and education.

Transparency, communications and education about protected areas need to be priorities for WERAC and for government as the implementation process moves forward. Many public concerns about the Protected Areas Plan for the Island of Newfoundland stemmed from misinformation that was circulated via social media, the news and by elected officials. There needs to be public education clarifying this misinformation and properly informing the public about the implementation process and the importance of protected areas.

One of the challenges with the Plan has been the historical lack of transparency. The Plan was developed within government and was not available to the public until 2020 when government directed WERAC to release the Plan for the Phase 1 consultation process. The Plan came as a complete surprise to many.

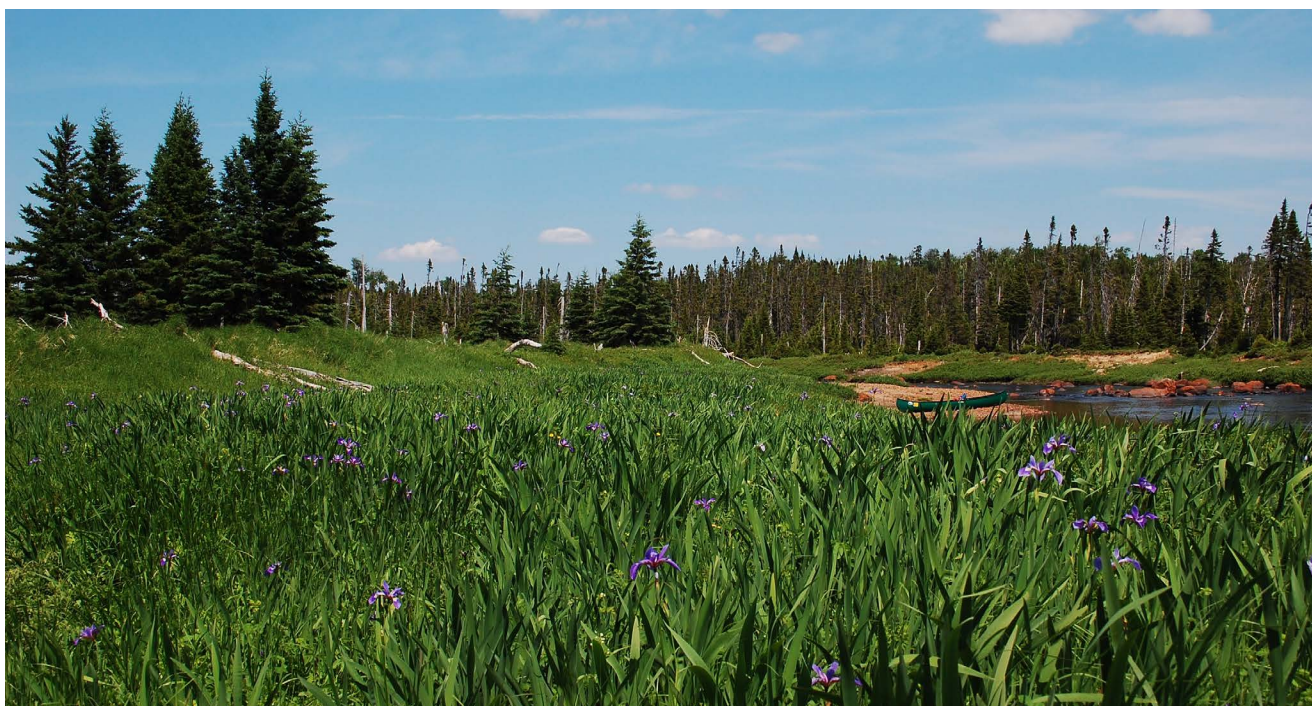
WERAC received negative feedback that focused on the lack of prior communication, education, and transparency. Although WERAC has requested the Plan be made public for many years, and was not responsible for the lack of transparency, the public saw WERAC as responsible for not engaging the people earlier in the process. WERAC and government both lost credibility and more importantly, we lost the trust of many citizens. It is important to take every opportunity to rebuild trust in the process, by clarifying misconceptions through education and communications, and being transparent moving forward.

7. Develop a Communications Plan to support the Protected Areas Plan and Phase 2 consultation, with a focus on improved government transparency and education about importance and value of protected areas.
 - 7.1 Government of Newfoundland and Labrador must take ownership of the Plan publicly and promote the importance of protected areas and the Plan.
 - 7.2 Develop an internal cross-departmental communications effort to educate government employees about the value of protected areas, government's mandate and the implementation process.
 - 7.3 Develop a comprehensive public-awareness communication campaign with general education about the importance of protected areas for biodiversity and climate change mitigation, the economic value of protected areas, provincial efforts to improve protection, the Plan, and the implementation process. Roll out educational materials (video ads, social media, etc.) in advance of Phase 2 of the reserve establishment process. This campaign needs to be led and funded by government. Consider hiring external expertise to support this initiative.
 - 7.4 In the spirit of transparency, release the WERAC Recommendations Report and a Recommendations Summary to the public.
 - 7.5 Consider integrating more education about protected areas into the provincial school curriculum.

Supporting Recommendation 8: Endorse protected areas as part of the climate change solution.

Protected areas are recognized as one of the most effective ways to capture carbon from the atmosphere, and a crucial part of our response to climate change. A recent study shows that the Island of Newfoundland has extensive high-carbon areas such as wetlands that overlap with intact and roadless areas, yet have no legal protection (Mitchell et al., 2021; Soto-Navarro et al., 2019). The climate crisis and global biodiversity loss highlight the importance of protecting some of our carbon-rich lands for biodiversity conservation and climate stabilization.

8. Recognize protected areas and protected areas system planning as an essential part of the climate change strategy for the province. Communicate publicly that meeting national biodiversity protection targets and establishing a protected areas network are important tools in provincial efforts to mitigate climate change.



King George VI Ecological Reserve - Tina Leonard

Expand on the Plan to build a more comprehensive system of protected areas for the province

Supporting Recommendation 9: Expand on planning efforts to reach current conservation targets and broaden the Plan to include additional areas and protect other values.

The best available science must be used to guide the Province in planning and developing a world-class protected areas network. The foundation for the selection and management of wilderness and ecological reserves must be based on conservation science. In addition to the areas outlined in the Plan, government must pursue science-based targets and work towards implementing national and global targets for conservation.

Additionally, WERAC recognizes that other protected area values (such as connectivity, sites of local ecological and biodiversity significance, cultural and traditional sites, and recreational areas) are not currently included in the Provincial Protected Areas Strategy, but are deserving of protection. These types of sites do not currently have a dedicated protective legal mechanism.

Many respondents were of the opinion that more protected area is required, over and above that proposed in the Protected Areas Plan for the Island of Newfoundland. There were 89 submissions outlining suggestions for 118 additional areas to be considered as reserves and added to the Plan. This also speaks to the strong support for the concept of protected areas in the province. The following actions are aimed at expanding on the current Protected Areas Plan to meet contemporary conservation standards, protect other values, meet targets and respond to publically proposed areas.

9. Update the Plan to include new conservation planning methodology and newly proposed reserves for Phase 2 public consultations.
 - 9.1 Publicly commit and start planning to work towards national targets for conservation (currently to protect 30% by 2030).

- 9.2 Increase protection for species-at-risk and endemic species (species found only in a given region). Forty endemic species have been documented in the province, most of which occur on the Island of Newfoundland (Enns et al., 2020). The national Key Biodiversity Areas Standard can be used to highlight areas of priority for species habitat. Conduct a Key Biodiversity Area (KBA) analysis using national standards developed in 2020, based on the IUCN Global Key Biodiversity Areas Standard (IUCN, 2016) to identify KBAs that need to be added as proposed reserves, including critical habitat as defined under the Endangered Species Act.
- 9.3 Assess the additional areas proposed by the public during the Phase 1 consultation period for their potential contribution to protect species at risk and areas of biodiversity importance, represent natural regions, provide connectivity between reserves and protect natural areas of cultural value and incorporate these into the Implementation Plan for Phase 2 where feasible to improve efficiency.
- 9.4 Update the Protected Areas Strategy to incorporate other values in addition to the Strategy's Component I, II and III reserves, specifically to protect smaller natural areas of cultural, recreational or local conservation importance, and to improve connectivity. Include representation and biodiversity hotspots for freshwater and wetland ecosystems.
- 9.5 Continue moving forward on establishing previously proposed reserves (i.e. Indian Arm Brook proposed reserve and Little Grand Lake Provisional Ecological Reserve) and continue to accept, assess and move forward on (where appropriate) candidate reserve nominations from the public.
- 9.6 Change Middle Ridge Wildlife Reserve to a Wilderness Reserve under the WER Act. When Middle Ridge Wildlife Reserve was established in 1990 under the Wildlife Act, it was intended to be eventually protected within Bay du Nord Wilderness Reserve. Proceed to establish Middle Ridge Wildlife Reserve as part of the Bay du Nord Wilderness Reserve as intended during public consultations for the Bay du Nord Wilderness Reserve. This would require an updated public consultation and recommendations report.
- 9.7 Conduct an analysis of key freshwater habitats and watersheds (i.e. salmon rivers and waterfowl and wetlands habitat) contained in the current Plan and propose additional reserves to address any gaps identified.

Supporting Recommendation 10: Improve protected area and landscape connectivity.

Most of the proposed protected areas are not large enough to survive larger-scale ecological disturbances to their biodiversity, and ecological functioning on their own. Landscape and protected area connectivity is recognized globally as an important part of effective protected area management, biodiversity conservation and climate change adaptation. Ecological linkages are a critical component of a 'well-connected' and effective system of protected areas that supports animal and plant movement across the landscape (Hilty et al., 2020; Lemieux et al., 2021).

10. Update provincial conservation planning to include protected areas and landscape connectivity.
 - 10.1 Update the Plan to include the concept of ecological connectivity. Identify priority areas that create protected area connectivity and include them as additions to the Plan. Prioritize linkages between closely spaced reserves (e.g., protect the landscape connecting Halls Gullies to Ripple Pond) and between federal and provincial protected areas such as Bay du Nord Wilderness Reserve and Terra Nova National Park.
 - 10.2 Work towards protection of areas that improve landscape connectivity through other protective mechanisms that can meet ecological corridor criteria (e.g., other legislation, cooperative agreements, or private protected lands). For example, the Provincial Sustainable Forestry Management Strategy (2014-2024) includes large areas set aside temporarily from cutting as Large Intact Landscapes. Areas such as these could potentially be managed to provide connectivity value for the long-term.
 - 10.3 Work with other land and resource managers as well as private enterprises to improve ecological connectivity for areas where a protected area is not feasible due to existing developments, impacts or land tenure.

Supporting Recommendation 11: Consider other protective mechanisms.

There are other protective mechanisms that, where appropriate, could potentially help the Government of Newfoundland and Labrador protect more species and landscapes, and move the province closer to national and international targets for protection.

11. Explore other protection mechanisms and land use planning mechanisms other than wilderness and ecological reserves that singly or in combination meet the protected area or Other Effective Conservation Measures (OECMs) standards to improve protection of other natural or cultural values.
 - 11.1 Consider partnering to seek designation for a region as a UNESCO Biosphere Reserve, where appropriate, to improve conservation of biodiversity and cultural diversity, support socio-culturally and environmentally sustainable economic development, and support development through research, monitoring, education and training.
 - 11.2 Consider protection through OECMs to meet increasing conservation targets of 25-30% and connectivity between protected areas.
 - 11.3 Consider other mechanisms to enable conservation of Crown lands that don't fall under the WER Act or a revised Protected Areas Strategy (e.g., protection of recreational trails, etc.). Complete an assessment of how these mechanisms might be layered to meet minimum standards for protecting species and ecosystems.

Supporting Recommendation 12: Develop a collaborative conservation planning process for Labrador.

Protected areas planning for Labrador needs to move forward immediately. Government must develop an open and collaborative process as we move forward with protected areas planning in Labrador. Just 6.9% of Labrador is currently protected. Most of Labrador's land-mass is covered by land claims from the three Indigenous groups in Labrador. While only one of these land claims has been fully settled, conservation planning in Labrador will necessarily be Indigenous-led, and will require extensive collaboration among the Indigenous, provincial and federal governments.

12. Move forward with Labrador planning immediately and provide the necessary support and funding to do so.

12.1 Provide WERAC with direction to invite Labrador Indigenous groups to participate in developing a process for conservation planning for Labrador.

12.2 Approve WERAC to work with the Nunatsiavut Government to discuss possible protection of previously identified areas.

12.3 Invest in ecosystem science in Labrador, with the inclusion of Indigenous knowledge systems. Increase staffing capacity in Labrador to carry out a Labrador specific gap analysis in partnership with Indigenous and other groups currently doing scientific research in Labrador.

Manage reserves to benefit nature and support people, and update the WER Act to reflect this

Supporting Recommendation 13: Invest in rural communities, sustainable rural economic development, and reserve management.

Protected areas can and should benefit the people living next to them. Protected areas, particularly when linked with ecotourism, have a proven successful in supporting diverse and sustained economic development (Wilson et al., 2010; Heagney et al., 2019; Naidoo et al., 2019). With collaborative planning, protected areas can create excellent opportunities for long-term rural investment, economic diversification and nature-based, low-impact economic development. Protected areas, when fully established and publicized, can become magnets for investment in rural economic activities like ecotourism, guiding and outfitting, as well as in emerging fields in science and technology. A recent study by the Ontario Auditor General's office found that the economic return on investment in protected areas was more than 6:1 (Auditor General of Ontario, 2020). Throughout the world, a wide range of studies have demonstrated the economic, food security, and health benefits of protected areas (e.g., Naidoo et al., 2019), particularly when ecotourism is planned into the protected area. WERAC also

considers protected areas as one of the most effective ways to protect lands that support low-impact subsistence and traditional activities long-term. Government should view, and promote, protected areas as an investment in the social and economic future of rural Newfoundland and Labrador.

Government investment in staffing is required to establish and manage protected areas and build a functioning protected areas network. Government investment is also an important part of rural development. Investment in rural staff positions also increases local support for reserves, and creates opportunities for further economic development. Adequate enforcement was also mentioned during the public consultations as a requirement for creating an effective network of protected areas. Increased enforcement must go hand-in-hand with the establishment of more reserves.

13. Support and diversify rural economies by encouraging sustainable eco-tourism opportunities associated with wilderness and ecological reserves, and investing in local jobs.

13.1 Set up an interdepartmental working group with Tourism Division (Tourism, Culture, Arts and Recreation) and Crown Lands Division (Fisheries, Forestry and Agriculture) to consider how to support sustainable eco-tourism opportunities, including development of minimal impact infrastructure such as hiking trails and signage. Include ecotourism operators and conservation experts.

13.2 Explore options for permitting ecotourism developments within reserves, given restrictions in the WER Act.

13.3 Invest in rural development and education adjacent to protected areas by creating strategic regional reserve management and interpretation positions. As an example, reinstate the two interpreter positions at Burnt Cape Ecological Reserve, on the Great Northern Peninsula.

13.4 Increase enforcement and monitoring presence for both existing and new reserves. Government needs to demonstrate adequate staffing to enforce and monitor our provincial protected areas and ensure that natural reserve values are not degraded.

13.5 Develop partnerships with groups and organizations involved in regional conservation to increase conservation efforts in communities (e.g., volunteer warden programs or 'Friends of' groups). Offer organizational support for local communities to run these.

Supporting Recommendation 14: Support reserve management that protects nature and local traditions.

The land has sustained our people for generations, not just in providing food security, but also in maintaining our culture and traditions. Reserve management must support that relationship. Many protected areas, particularly large protected areas, protect traditional and low-impact economic activities that do not endanger natural habitats. Many of the world's larger protected areas allow ongoing traditional subsistence and economic activities such as fishing, hunting and trapping, and new economic activities like ecotourism, while excluding resource industries that would destroy or degrade natural habitats. Continuation of these traditional activities is key to management of protected areas, where these activities do not cause harm to protected landscapes, species or habitat.

Before going back out to the public for a Phase 2 consultation, some guiding principles regarding activities must be developed for different reserve types. It is impossible to permit moose hunting without addressing, for example, an aging population and the use of ATV's to collect the meat. At the same time, management must consider how ATV use degrades habitats. ATV use has been shown to cause severe habitat degradation where it is not strictly controlled and laws enforced.

The most numerous submissions against the Plan were from people concerned about losing their ability to carry out traditional activities. There was a good deal of misinformation regarding activities that people thought would not be permitted. People wanted assurances that certain activities, such as hunting, will be permitted before indicating support for the plan. This level of caution is understandable when one considers the types of restrictions that people may have experienced in the past when national parks or ecological reserves were established to protect, for example, highly sensitive species at risk. While there were concerns, WERAC routinely considers local knowledge in the development of a reserve management approach. It is WERAC's assessment that many of these concerns can be addressed during the consultation and implementation process and through appropriate management.

14. Support reserve management planning that protects people's connection to land, and that reinforces the conservation targets of each protected area.

- 14.1 While new cabin development is not permitted in reserves, work with Crown Lands to develop a policy direction allowing for all existing cabins present at the time of the Plan's release to be permitted to remain in the proposed reserves.

- 14.2 Develop a general sustainable use and access policy that supports rural subsistence-based lifestyles in reserves where appropriate, and enables low-impact traditional activities, recreation and access that align with protection targets for new reserves. Policy direction would be based on reserve size, reserve intent, existing road and trail access, and whether the activity can feasibly be managed without damage to sensitive habitat or reserve integrity. For example, seabird hunting in a seabird ecological reserve would not be permitted. How any particular reserve is managed will be determined through the regular process of conducting local public consultations, considering best practices and conservation science. However, identifying possible science-based management policy options for activities in different reserve types can help clarify that process. The policy would prioritize access and continuation of traditional activities for local people, and include general recommendations for permitting certain traditional activities based on reserve size and protection intent. This would also include consideration of domestic timber harvesting, different types of motorized and non-motorized access (such as bikes, snowmobiles and ATVs), and zoning. For context, ATVs are not permitted in any other provincial or territorial protected areas in Canada, except (i) Indigenous peoples undertaking traditional activities, and (ii) accessing private property using existing trails.
- 14.3 Work with communications to ensure that the public is aware that reserve management will be determined through public consultation and science, tailored to each reserve.
- 14.4 Establish a scientific Management Advisory Committee of conservation ecologists to work with WERAC to recommend best practices to maintain and/or restore biodiversity in reserves.



West Brook Ecological Reserve - Jeri Graham

Supporting Recommendation 15: Modernize the WER Act.

Some of the recommendations outlined above may necessitate changes to the WER Act. Any changes to the Act must be supported by conservation science and planning, and be in support of the recommendations and values outlined above.

15. Update the WER Act and Regulations according to current best practices in conservation system planning.

15.1 Complete a jurisdictional scan to assess other new conservation planning and protection legislation in other provinces and territories.

15.2 Allow for future proposed reserves to be identified and implemented quickly, or for a number of reserves to be considered at once (i.e. adjust time frames for management plan and boundary development).

15.3 Allow for zoning, and development of low-impact eco-tourism infrastructure such as hiking trails. Permit trail development and maintenance for foot or bike or horseback riding (i.e. non-motorized) trails only.

15.4 Enable restoration of degraded areas using guiding principles of ecological restoration (according to IUCN guidance and the Society of Ecological Restoration).

15.5 Consider whether the WER Act needs to be updated in the spirit of reconciliation, to recognize requirements for consultation with Indigenous groups in the reserve establishment process and support Indigenous Protected and Conserved Areas (IPCAs) in the provincial context.

Abbreviations and Definitions

Biodiversity: the variety of living organisms from all sources (land, ocean, and freshwater) in the world or in a particular habitat or ecosystem. This includes diversity within species, between species and of ecosystems.

Endemic: plants, animals and fungi that only exist in one geographic region. For example, an Endangered plant called Long's Braya only exists on the limestone barrens of the Great Northern Peninsula, and nowhere else on Earth.

Habitat: the place or type of site where an organism or population regularly occurs.

IPCA (Indigenous Protected and Conserved Area): lands and waters where Indigenous governments have the primary role in protecting and conserving ecosystems through Indigenous laws, governance and knowledge systems (as defined by the Canadian Indigenous Circle of Experts, 2018).

OECM (Other Effective Area-based Conservation Measures): a geographically defined area other than a protected area, which is governed and managed in ways that achieve positive and sustained long-term outcomes for the in situ conservation of biodiversity, with associated ecosystem functions and services and where applicable, cultural, spiritual, socio-economic, and other locally relevant values (as defined by the Convention on Biological Diversity, 2018).

Protected Area: a clearly defined geographical space, recognized, dedicated and managed, through legal or other effective means, to achieve the long-term conservation of nature with associated ecosystem services and cultural values (as defined by the International Union for Conservation of Nature, 2008).

Connectivity: ecological connectivity is the degree to which landscapes allow species to move freely and ecological processes to continue to function unimpeded.

Natural Region: a region that is distinguishable by its common natural features, like species, geography, geology and climate. There are nine natural regions (also called ecoregions) on the island of Newfoundland, which are further subdivided into 25 subregions.

References

Auditor General of Ontario. 2020. Value-for-Money Audit: Conserving the Natural Environment with Protected Areas. Office of the Auditor General of Ontario. Toronto, Ontario, Canada. 64 pp.

Enns, A., D. Kraus and A. Hebb. 2020. Ours to Save: The distribution, status and conservation needs of Canada's endemic species. NatureServe Canada and Nature Conservancy of Canada. 75 pp. Accessed January, 2021. www.natureconservancy.ca/assets/documents/nat/Ours-to-Save_NCC_NatureServe_Jun4_2020.pdf

Girardin, C. A. J., S. Jenkins, N. Seddon, M. Allen, S. L. Lewis, C. E. Wheeler, B. W. Grisom, and Y. Malhi. 2021. Nature-based solutions can help cool the planet – if we act now. *Nature*. 593: 191-194.

Heagney, E.C., J.M. Rose, A. Ardeshiri, and M. Kovac. 2019. The economic value of tourism and recreation across a large protected area network. *Land Use Policy* 88: 1-11.

Hilty, J., G.L. Worboys, A. Keeley, S. Woodley, B. Lausche, H. Locke, M. Carr, I. Pulsford, J. Pittock, J.W. White, D.M. Theobald, J. Levine, M. Reuling, J.E.M. Watson, R. Ament, and G.M. Tabor. 2020. Guidelines for Conserving Connectivity through Ecological Networks and Corridors. Best Practice Protected Area Guidelines Series No. 30. IUCN, Gland, Switzerland. xiv + 122 pp.

IUCN. 2016. A Global Standard for the Identification of Key Biodiversity Areas, Version 1.0. First edition. Gland, Switzerland: IUCN.

Lemieux, C.J., A.L. Jacob, and P.A. Gray. 2021. Implementing Connectivity Conservation in Canada. Canadian Council on Ecological Areas (CCEA) Occasional Paper No. 22. Canadian Council on Ecological Areas, Wilfrid Laurier University, Waterloo, Ontario, Canada. vi + 216 pp.

Mitchell, M. G. E., R. Schuster, A. L. Jacob, D. E. L. Hanna, C. O. Dallaire, C. Raudsepp-Hearne, E. M. Bennett, B. Lehner, and K. M. A. Chan. 2021. Identifying key ecosystem service providing areas to inform national-scale conservation planning. *IOP Publishing: Environ. Res. Lett.* 16 (2021) 014038. <https://doi.org/10.1088/1748-9326/abc121>.

Naidoo, R., D. Gerkey, D. Hole, A. Pfaff, A.M. Ellis, C.D. Golden, D. Herrera, K. Johnson, M. Mulligan, T.H. Ricketts, and B. Fisher. 2019. Evaluating the impacts of protected areas on human well-being across the developing world. *Science Advances* 5(4): 1-7.

Newbold, T., and L. Hudson. 2015. Global effects of land use on local terrestrial biodiversity. *Nature* 520:45-50.

Notzl, L., R. Greene, and J.L. Ridley. 2013. Labrador Nature Atlas. Volume 1. Nature Conservancy of Canada, Toronto, Ontario. 204 pp.

Soto-Navarro, C., C. Ravilious, A. Arnell, X. de Lamo, M. Harfoot, S. L. L. Hill, O. R. Wearn, M. Santoro, A. Bouvet, S. Mermoz, T. Le Toan, J. Xia, S. Liu, W. Yuan, S. A. Spawn, H. K. Gibbs, S. Ferrier, T. Harwood, R. Alkemade, A. M. Schipper, G. Schmidt-Traub, B. Strassburg, L. Miles, N. D. Burgess, and V. Kapos. 2019. Mapping co-benefits for carbon storage and biodiversity to inform conservation policy and action. *Phil. Trans. R. Soc. B* 375: 20190128. <http://dx.doi.org/10.1098/rstb.2019.0128>

Wilderness and Ecological Reserves Advisory Council (WERAC). 2015. Report on Criteria Development for Prioritizing Sites. Unpublished report.

Wilson, J.J., V.A. Lantz, and D.A. MacLean. 2010. A benefit-cost analysis of establishing protected natural areas in New Brunswick, Canada. *Forest Policy and Economics* 12:94-103.

Appendix A. A History of the Protected Areas Plan

The idea of creating a system or a network of protected areas, rather than just individual protected areas that were planned in isolation from each other, was first brought into law nationally in the 1960's by Parks Canada. Over time, it became clear that Newfoundland and Labrador's protected areas also needed to be planned and established as part of a network. The goal of such a network would be to protect enough land, species and their habitats to ensure that the province's biodiversity was not lost. In 1992, the Government of Newfoundland and Labrador signed a Statement of Commitment to Complete Canada's Network of Protected Areas by the year 2000. Also that year, the Canadian Council of Forest Ministers (of which Newfoundland and Labrador was a part) committed to establishing a network of protected areas by the year 2000. Such a network would be representative of Canada's forests, provide ecological benchmarks, protect areas of unique biological value and ensure wilderness experiences. One year later, the Convention on Biological Diversity was ratified with Canada as a signatory. This legally binding international treaty committed the country, and the provinces and territories within it, to protecting 12% of our land base.

To meet these land protection goals, the province began working on a Natural Areas System Plan (NASP) for the province. A Provincial Protected Areas Strategy was adopted in 1995. Along with this Strategy, government recognized that wilderness and ecological reserves are a critical element of the broader sustainable development policy of the Province and directed that the reserve establishment process be accelerated. The Strategy prioritized protection of large wilderness areas (Component I), 'representative' areas, or intact landscapes within each natural region in medium-sized reserves (Component II), and smaller areas with unique features or habitat for rare or endangered species (Component III). Planning also prioritized areas with the lowest level of competing interests from natural resource extractive industries, especially forestry and mining and petroleum exploration and production. The goal of network planning was to identify the best quality wilderness areas that would represent each natural region.

Work focused primarily on the Island, since development pressure was lower in Labrador and resolution of Indigenous land claims was a priority there. Twenty-five candidate protected areas (24 areas on the Island and one in Labrador) were chosen and proposed by an inter-agency System Plan Committee. The committee included a diverse team of experts drawn from government, academia, and the non-governmental organization sector. The range of expertise within the team included economic geology (mineral deposits), forestry, biogeography, and biodiversity. In 1996, the first draft of a NASP was presented to Cabinet. In 2000, Cabinet granted 'interim protection' to these 25 candidate reserves. In

those areas, no new developments could occur except for those associated with mineral and petroleum exploration (Map 1). Interim protection was meant as a short-term measure to maintain site integrity while resolving any outstanding issues with other departments.

Debating a system of protected areas for the Island 2000-2018

The years that followed focused on various attempts to reconcile competing land use interests for the candidate reserves. The Conflict Resolution Committee (2002-2003) and NASP Coalition (2004-2005) were two efforts that attempted to address conflicts present in the suite of interim protected areas. Following a review in 2005 by the Interdepartmental Land Use Committee, funding and direction were provided to develop a final suite of areas for the NASP. From 2006 to 2008, an Interdepartmental Working Committee was established and conducted a full re-assessment of candidate reserves; a Deputy Minister Steering Committee provided oversight to the process.

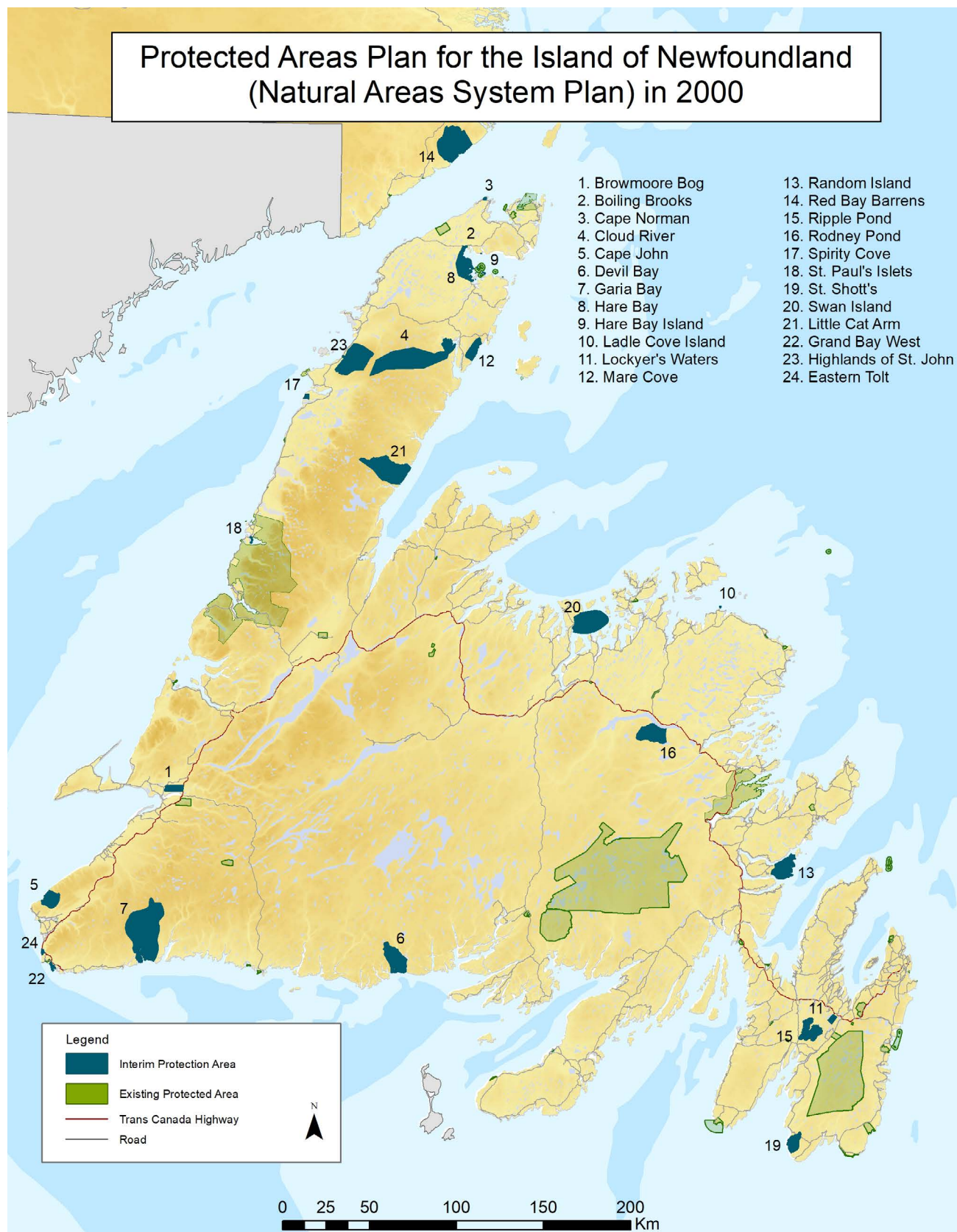
In 2010, the Government of Canada signed new biodiversity protection commitments, the 'Aichi targets', pledging to protect 17% of land area and 10% of marine area by 2020. These areas were adopted as Canada's Target 1 commitments.

That same year, the Provincial Ministers of Natural Resources, and Environment and Conservation reached consensus on 24 proposed reserves and 7 additional areas of interest where ongoing mineral or petroleum exploration could continue to occur (Map 2). Despite this consensus between those two Ministers, and mandate letters directing the completion and public release of the NASP, there were still areas of disagreement between departments.

In 2016, to accommodate possible mineral or petroleum potential, the Deputy Minister Steering Committee came together again to confirm removal of a proposed reserve in southwestern Newfoundland and replacement with an alternate, agreed-upon site. To accommodate requirements of the sawlog industry, two proposed reserves in Central Newfoundland were removed and replaced with intact forest sites on the Great Northern Peninsula, as well as alternate sites in Central Newfoundland (Map 3). In 2019, the NASP was again submitted to all government departments for review, this time under the title of 'A Home for Nature: Protected Areas Plan for the Island of Newfoundland'.

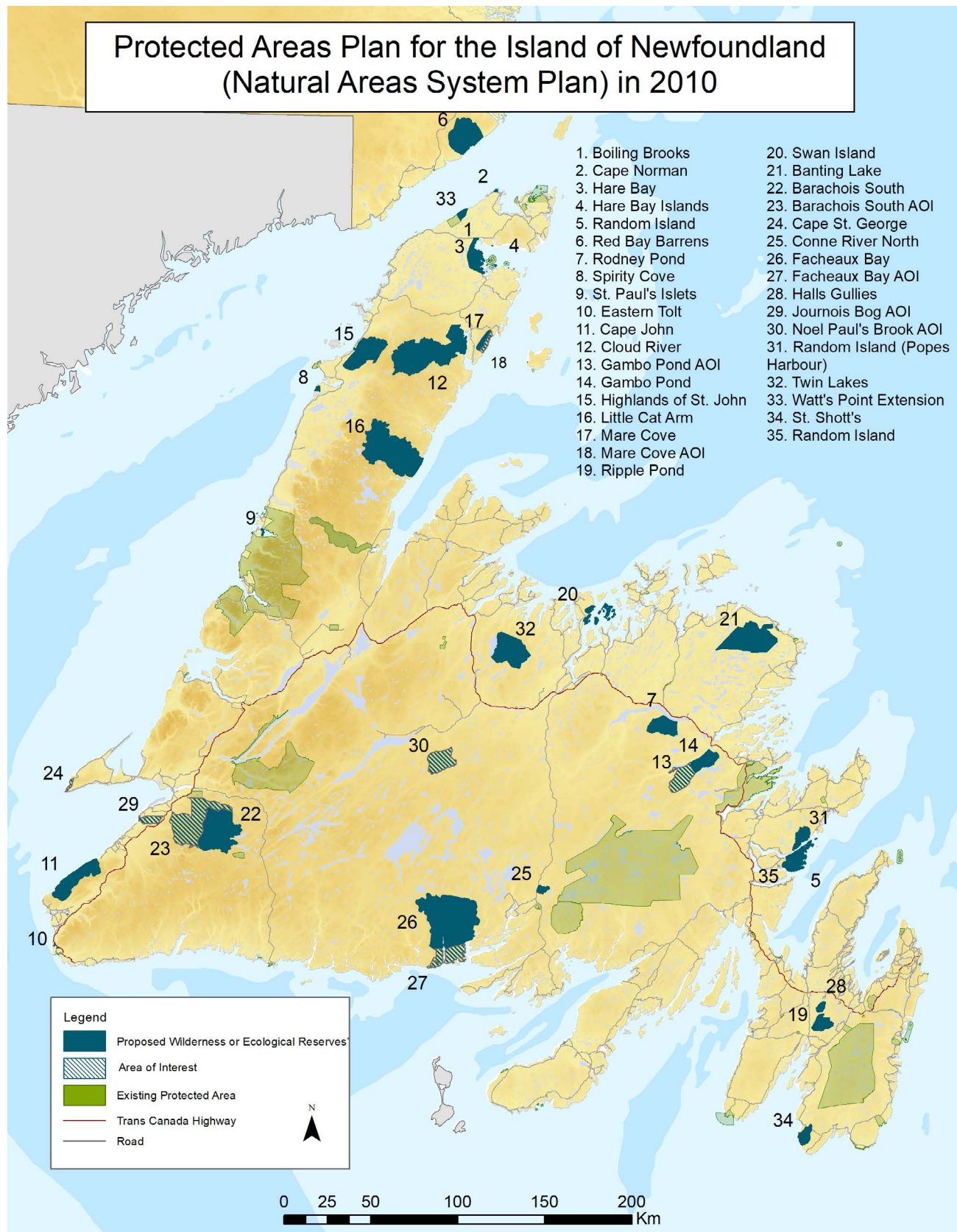
The following maps in Appendix A outline some of the key stages of plan development. Map 1 shows the interim protected areas from 2000, which were to be protected while conflict resolution proceeded between departments. Map 2 shows the suite of proposed reserves that were agreed upon by Ministers Dunderdale and Johnson in 2010, including additional 'Areas of Interest' where mining or petroleum exploration could continue to occur. Map 3 depicts the current proposed reserves as approved for public consultation by government in February 2020.

Map 1



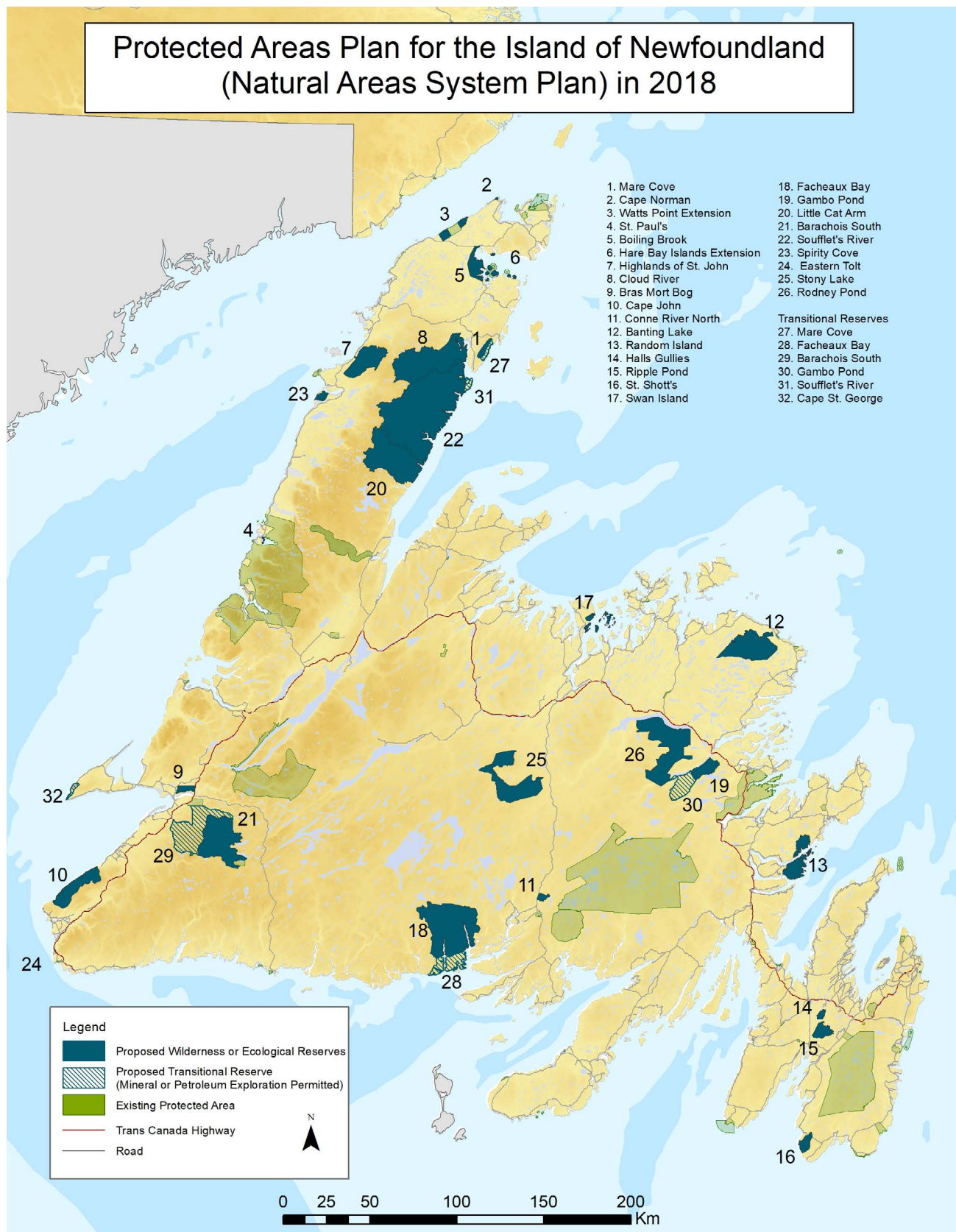
Map 1. Proposed reserves given NL Cabinet 'interim protection' in 2000, to be protected while Natural Areas System Plan conflict resolution proceeded between departments.

Map 2



Map 2. Proposed reserves agreed upon by the Ministers of Environment and Conservation and Natural Resources in 2010, including 'Areas of Interest' where mining or petroleum exploration could continue to occur.

Map 3



Map 3. Proposed reserves approved for public consultation by government in February 2020, including proposed transitional reserves, where mining or petroleum exploration could continue to occur.

Appendix B. What We Heard Report



WERAC

*Wilderness and Ecological
Reserves Advisory Council*

What We Heard:

Phase 1 Public Consultation on A Home for Nature:
Protected Areas Plan for the Island of Newfoundland



Acknowledgements

The Wilderness and Ecological Reserves Advisory Council (WERAC) would like to thank everyone who submitted comments on the proposed Protected Areas Plan for the Island of Newfoundland. WERAC received many submissions from across Newfoundland and Labrador, Canada and other countries. Each submission was read and their perspectives were included in the feedback assessment. This **What We Heard** document was written to reflect that variety of perspectives as much as possible.

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The maps in this document are for illustrative purposes only.

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Terra Nova National Park

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Introduction

This **What We Heard** document summarizes submissions received during the 2020 Phase 1 consultation on the proposed Protected Areas Plan (A Home for Nature: Protected Areas Plan for the Island of Newfoundland). The intention of this report is to reflect the points of view that people brought forward. To capture the richness of these opinions, WERAC has included a sample of direct quotes, and has made those comments anonymous to maintain privacy.

The Wilderness and Ecological Reserves Act (WER Act) came into effect in 1980 to “provide for natural areas in the province to be set aside for the benefit, education and enjoyment of the people of the province.” The WER Act is a tool to protect the special habitats and species of Newfoundland and Labrador, while also protecting the unique relationship that we have with nature.

The WER Act also mandates the creation of WERAC. WERAC is a volunteer council responsible for leading public consultations on proposed wilderness and ecological reserves. WERAC advises government on creation and management of wilderness and ecological reserves in the province. WERAC members are appointed by government via the Independent Appointments Commission for a 3-year term. Any resident of Newfoundland and Labrador can apply to be on the Council and efforts are made to represent each region of the province. For more information on becoming a member of WERAC, please visit the Independent Appointments Commission website (www.iacnl.ca).

The WER Act protects the interests of residents living next to proposed reserves by requiring local public consultations as part of the reserve creation and management process. Before a reserve is established, public consultations must be undertaken to see if a reserve will work for nearby communities, and to inform reserve boundaries and the management plan. Once a reserve is established, public consultations are required before any proposed changes (other than staffing) are made to reserve boundaries or management.

In 1994, the Government of Newfoundland and Labrador started developing a plan for a system of protected areas for the province. At that time, government committed to creating a system of reserves that would protect species, their habitats, and the diverse landscapes of the province and adopted a Protected Areas Strategy to support these efforts. For more information on the protected areas planning in Newfoundland and Labrador, please visit gov.nl.ca/eccm/homefornature.

The Protected Areas Strategy guided government in choosing the reserves that are proposed in the Plan. Areas were chosen that: 1) have less development (such as industry or roads), and 2) are low priority for resource development (such as forestry, petroleum, and mining) thereby minimizing future resource conflicts. Larger reserves were chosen, where possible, because they are better at protecting species and their habitats than smaller areas.

The areas shown in the Plan and their boundaries are the first draft of a possible network of protected areas for the Island. Following review of the public feedback, WERAC will make recommendations to government on a path forward. Government will decide whether and

how to move forward with the establishment of reserves proposed in the Plan. Once directed by government on how to proceed, WERAC will begin to engage the public, and in particular, communities near the proposed reserves. Local public consultations will be an opportunity to talk about whether to protect these areas, whether to change the proposed boundaries, and options for reserve management.

The Public Consultation Process

The public consultation process for the Protected Areas Plan is in two phases. Phase 1 is the public consultation that occurred in 2020. This Phase 1 consultation is in addition to the regular detailed local consultation process that WERAC undertakes for reserve creation. This **What We Heard** document summarizes comments from the Phase 1 consultation. Phase 2 will occur following further direction from government, and will include local public consultations on each proposed reserve. For more information on Phase 2, see Summary and Next Steps.

Phase 1

On February 28, 2020, provincial government directed WERAC to release the proposed Protected Areas Plan for the Island of Newfoundland for public feedback. Due to the COVID-19 pandemic, the Plan's release was delayed until May 28, 2020. The consultation period was first set for one month, but was extended to October 1, 2020 shortly thereafter to allow people more time to submit comments.

Objectives

The main consultation objectives were to:

1. Find out the level of public support for creating a system of protected areas on the Island;
2. Learn about any gaps in the proposed Plan;
3. Hear local knowledge about ongoing activities in the proposed reserves; and to
4. Learn about how local people might like these proposed reserves to be managed.

Additionally, WERAC's communication objectives were to:

1. Present the Plan to the public;
2. Engage the public about the need for protected areas in general, and the need for a system of protected areas on the Island; and to
3. Explain the consultation process and why each proposed reserve was chosen.

Approach

WERAC informed the public about the Protected Areas Plan in several ways. The initial release was made through a media announcement. Information on the Plan was made available on the Government of Newfoundland and Labrador's Public Engagement Division website at [A Home for Nature: Protected Areas Plan for the Island of Newfoundland | EngageNL](#)

The website explained the Plan and the process, and presented the following documents:

1. [A Home for Nature: Protected Areas Plan for the Island of Newfoundland](#);
2. [Questions and Answers Regarding a Home for Nature: Protected Areas Plan for the Island of Newfoundland](#); and
3. [Information sheets answering common questions](#).

The website also included [A Home for Nature Story Map](#). The Story Map showed a scalable map of each of the proposed reserves and provided background on why they were chosen for protection.

Details about the consultation were also shared through emails, print material, radio and newspaper interviews, and social media. As people signed up for more information on the Plan (on [engageNL.ca](#)), they were included in future emails. WERAC also shared printed copies of the Plan and Questions and Answers document with organizations and individuals upon request.

Avenues for Feedback

WERAC invited people to comment on the Plan through [engageNL.ca](#), by using a fillable or printable pdf form, email, phone correspondence, or conference call meetings with the Council.

For Phase 1, WERAC focused their outreach efforts on municipalities and organizations. WERAC met with the following Town Councils, regional Councils, and organizations. Due to COVID-19 restrictions on large public gatherings, meetings were held virtually.

Town of Roddickton-Bide Arm

Town of St. Lunaire-Griquet

Great Northern Peninsula Joint Council (Northern)

Great Northern Peninsula Joint Council (Southern)

Town of Port aux Choix

Newfoundland and Labrador Aquaculture Industry Association

Newfoundland and Labrador Prospectors Association

Town of Gambo

Town of Gander

Town of St. Georges

Town of Stephenville Crossing

Miawpukek Mi'kamawey Mawi'omi

Newfoundland and Labrador

Outfitters Association

In addition, on September 18, 2020, Municipalities NL hosted a webinar in partnership with WERAC to talk to municipalities across the province. WERAC provided background on the Plan and the process and answered questions.

Submissions Received by WERAC

The comments that WERAC received are reported in this **What We Heard** document as either unique submissions, form letters or a petition. Unique submissions are those that were written by the person wanting to comment on the Plan. Form letters and the petition were treated separately as they were, for the most part, not written by the person submitting the comments. All submissions, except the petition, were cross-checked to make sure people weren't counted more than once. If people did comment more than once, or in more than one way, all their

comments were combined into one submission per person. WERAC also received seven late submissions both for and against the Plan. These few late submissions were included in the feedback assessment. The anonymized raw data and summaries from public submissions are available online. For more information on additional resources, please visit [A Home for Nature: Protected Areas Plan for the Island of Newfoundland | EngageNL](https://www.gov.nl.ca/eccm/homefornature) and [gov.nl.ca/eccm/homefornature](https://www.gov.nl.ca/eccm/homefornature).

Unique Submissions

WERAC received 898 unique submissions. These responses were received either through the engageNL website, mail, email, or phone. Of the 898 submissions, 16 were from municipalities, 42 were from businesses and organizations, and 840 were from individuals.

In some cases, people included information about where they lived. For these, people were grouped as: living in the province; Newfoundland and Labrador residents living away; residents of other parts of Canada; or respondents from outside Canada. For those that did not state their location, it is likely that some were from the province; however, this could not be confirmed based on the information provided.

Table 1. **Number of unique submissions to the Wilderness and Ecological Reserves Advisory Council grouped by where people said they lived.** Residence was determined through either postal code (first 3 digits), or a reference to being from a community, region or one of the noted categories.

Location	Number of Unique Submissions
Submissions from NL	633
NL resident living away	10
Canadian jurisdictions outside NL	25
International	1
Unspecified	229
Total	898

Form Letters

WERAC received 996 unedited form (standardized) letters by email. Form letters that were edited to include additional comments were categorized as unique submissions. There were four different types of form letters, each of which expressed support for the Plan. The form letters all recommended moving forward with local public consultations as the next step in creating a system of protected areas for the Island. The following quotes are excerpts from two of the form letters.

“ The proposed Protected Areas Plan for the Island of Newfoundland is a blueprint for developing a system of protected areas for the Island. Support for the plan will ensure that these areas are set aside for all to enjoy and thrive. With less than 7% of our public lands and freshwater protected, the time is now to put aside space for nature. ”

“ A planned system of reserves, protected by legislation, is also the best way to conserve our important species and natural areas. Without community-led designation, legislated protection, and effective management plans we could end up losing some of our most special lands. ”

Some form letters included location information. For these, respondents were grouped as: living in the province, a Newfoundland and Labrador resident living away, or residents of other parts of Canada. For those that did not state their location, it is likely that some were from the province; however, this could not be confirmed based on the information provided.

Table 2. **Number of form letter submissions to WERAC grouped by where people said they lived.** Residence was determined through either postal code, or a reference to being from a community, region or one of the noted categories. (Phase I consultation on the Protected Areas Plan for the Island of Newfoundland)

Location	Number of Form Letter Submissions
Submissions from NL	130
NL resident living away	35
Canadian jurisdictions outside NL	699
Unspecified	132
Total	996

Petition

A petition to government with 4,582 signatures was shared with WERAC. The petition did not support the Plan as presented and expressed concerns about how the Plan was developed. In particular, the petition pointed out that the Plan was released for public review without first speaking with local people who have intimate knowledge of the proposed areas. The petition also outlined concerns with the timing of the consultation due to the COVID-19 pandemic. The following quote is an excerpt from the petition.

“ Failure to follow the established principles of openness and consultation ... brings into question the validity and transparency of the entire process. ”

Specifically, the petition urged government to:

1. Conduct inclusive public consultations for future protected area planning; and
2. Release the data used to select the proposed areas and transitional reserves.

Table 3. **Number of signatures on a petition submitted to the NL House of Assembly on June 16, 2020 grouped by where people said they lived.** (Phase I consultation on the Protected Areas Plan for the Island of Newfoundland)

Location	Number of Petition Submissions
Individual from NL	1,482
Canadian jurisdictions outside NL	1,399
International	1,701
Total	4,582

Overall Level of Support for the Plan

This assessment focuses primarily on unique submissions (898). The form letters and petition are outlined above and are considered separately because each of those submissions have the same comments. The form letters supported the Plan and its timely implementation. The petition did not support the Plan being implemented without Phase 2 public consultations and additional transparency.

Of the unique submissions, the majority of people supported the Plan (56%) to some extent. People either supported the Plan generally (41.8%), with reservations (14%), or supported specific proposed reserves (0.2%).

“ There is nothing any more important than our natural world. It’s important in its own right, and of course we humans are part of it. Our natural world needs to be protected so it can thrive. I support all efforts towards that goal. ”

For those that did not support the Plan (44%), people were either generally against the proposed reserves (24.9%), or against specific proposed reserves or protecting a region (19.1%).

“ I see little value and significant downside to restricting these areas. I fear that far less people will experience the beauty of these natural areas in the sustainable way that we now do. ”

The level of support for the Plan was assessed by region based on the unique submissions and where people said they lived. WERAC defined regions based on combined postal codes (first 3 digits; see Figure 1),

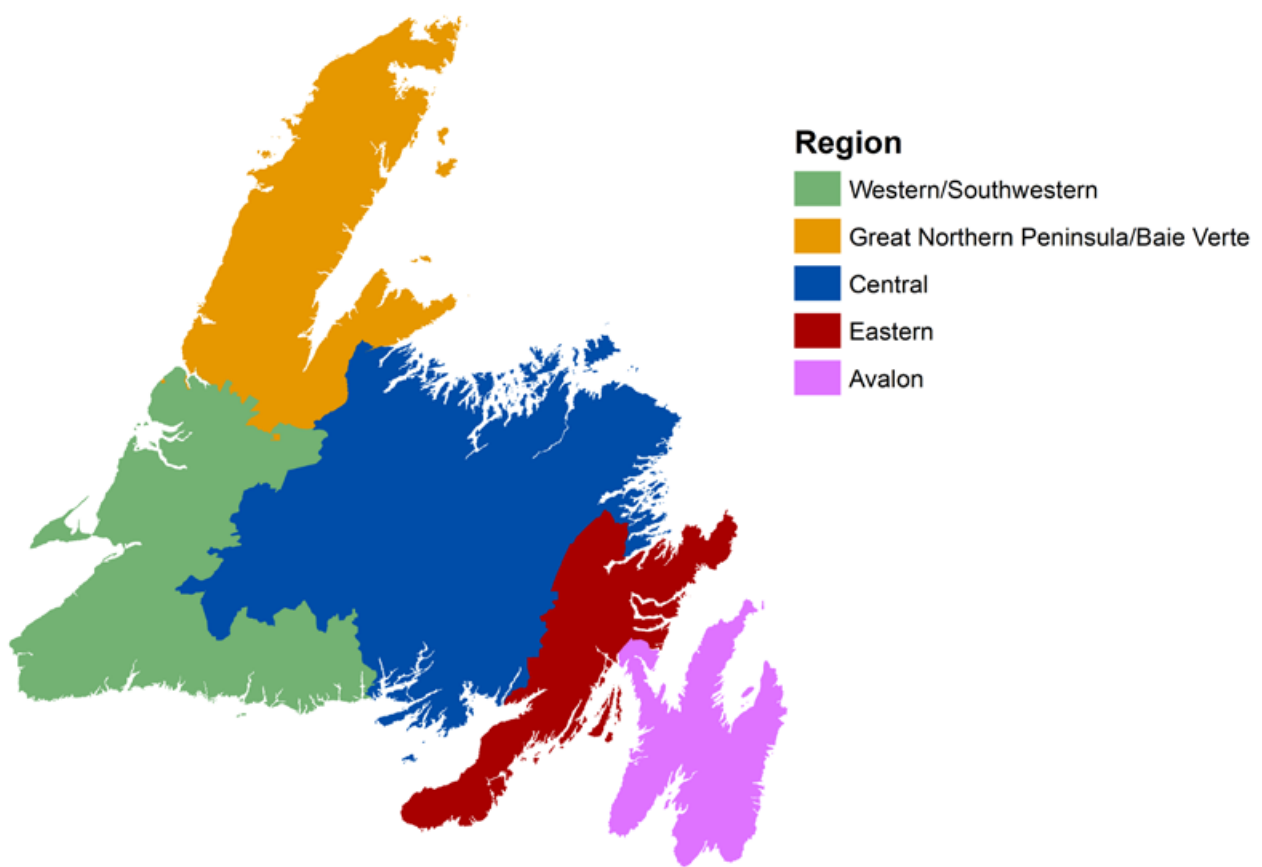


Figure 1. **Island of Newfoundland divided into regions based on boundaries of combined postal codes (first 3 digits).** This information was asked of respondents submitting data through the online questionnaire on the Protected Areas Plan for the Island of Newfoundland. Where respondents submitted comments by other means and provided their location, this data was also organized by combined postal code.

Regional Differences

Support for the Plan differed across the Island, but there were residents for and against the Plan in each region (See Figure 2):

- Support was strong on the Avalon (91%) and in Western/Southwestern Newfoundland (74%);
- Support was lower in Central (58 %) and Eastern regions (40%); and
- Lowest (32%) in the Great Northern Peninsula/Baie Verte region.

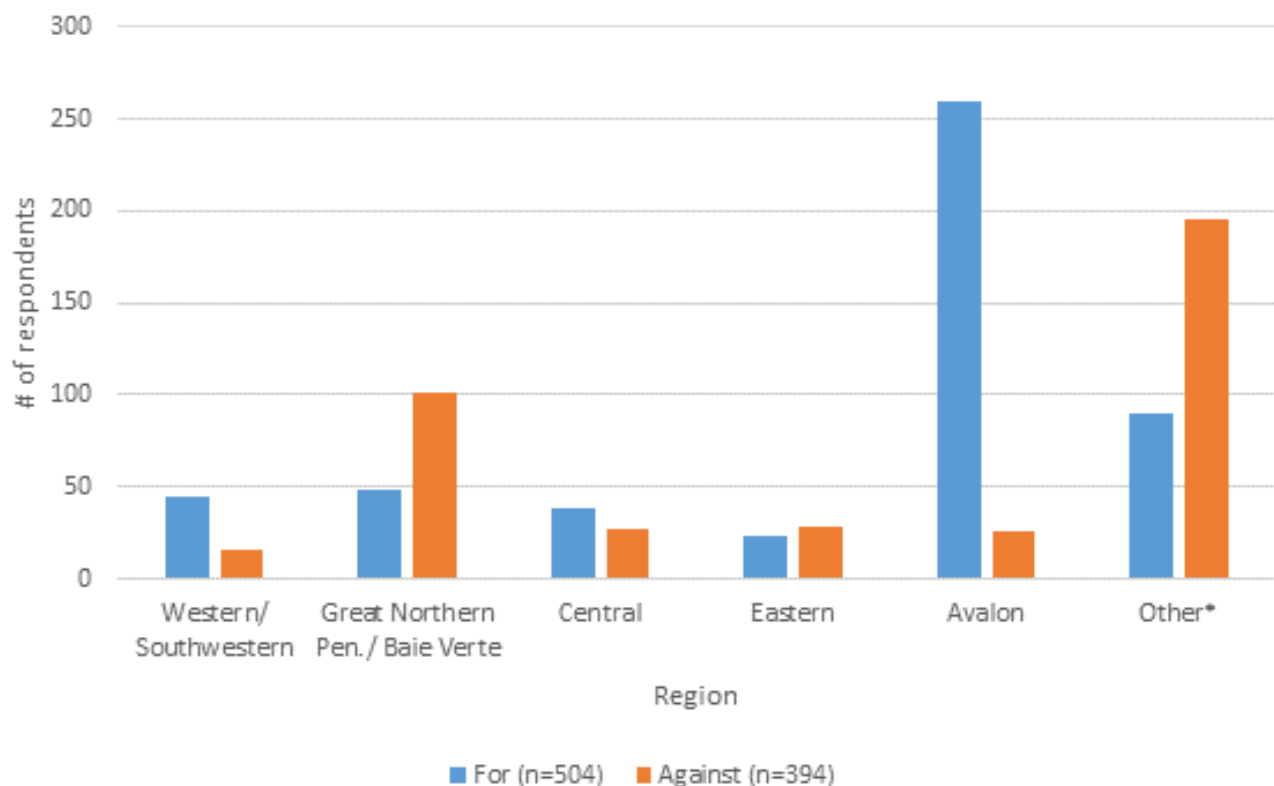


Figure 2. **Level of regional support for the Protected Areas Plan for the Island of Newfoundland.** Regions were delineated using postal codes (first 3 digits), where location was provided by respondents. See Figure 1 for regional boundaries. Respondents submitted location data to the Wilderness and Ecological Reserves Advisory Council through an online questionnaire, email, mail, and phone correspondence during the public consultation period in 2020. *‘Other’ includes those submissions from outside the Province or where location could not be determined.

Reasons Affecting the Level of Support for the Plan

In some cases, people offered specific reasons why they did or did not support the Plan to the extent they did. These are listed below from most common comment to least common. Similar concerns were shared sometimes by both those who supported the Plan, and those that did not. The most common reason given was a concern about continuing traditional activities or recreation (17.7%). The belief that existing legislation or local stewardship is sufficient to protect the land also figured strongly in people’s level of support for the Plan (10.8%). Equally, people also wanted to see more protection of wildlife, species, and their habitats (10.7%). Figure 3 below presents more detail of public feedback on the stated reasons people did or did not support the Plan.

Reasons Affecting the Level of Support for the Plan

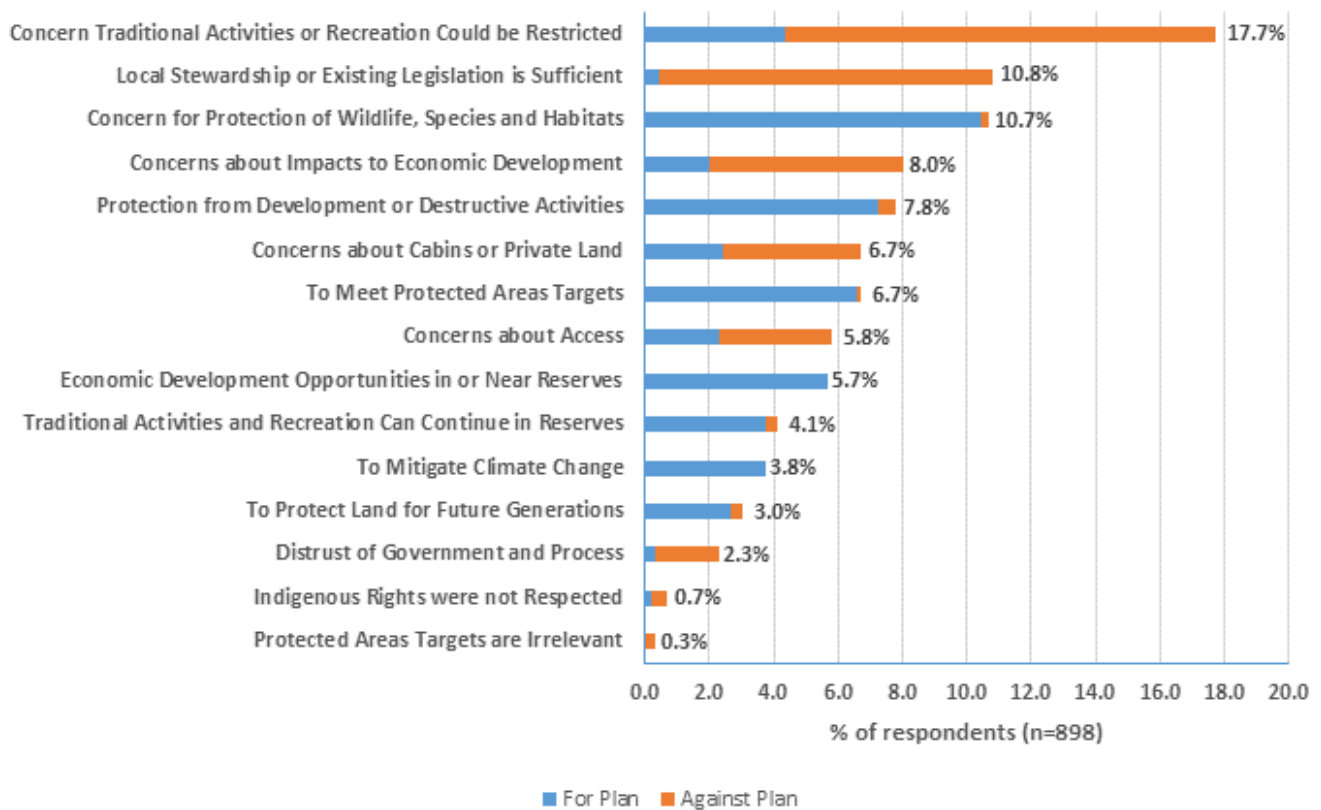


Figure 3. **Public feedback on reasons affecting the level of support for the Protected Areas Plan for the Island of Newfoundland.** Percentage is calculated based on all 898 unique submissions received by the Wilderness and Ecological Reserves Advisory Council. Information was received through an online questionnaire, email, mail, and phone correspondence during the public consultation period in 2020.

The more common reasons influencing support for the Plan are described in more detail below. Common themes arose when the submissions were assessed. The discussion about why people did or did not support the Plan to the extent that they did is organized by these themes.

Continuing Traditional Activities and Recreation

Some respondents expressed concern that they might lose the ability to continue recreation, traditional activities, or access resources for food or domestic firewood (17.7%). Others saw the proposed reserves as a way to ensure that these traditional activities could continue for generations and not be lost due to industrial development (4.1%).

“ The majority of people living in the proposed areas of the Great Northern Peninsula need to be able to use the land to survive (i.e. hunting, fishing, and cutting wood for home heating). These areas should not be listed as reserves as they are important to local residents to use for everyday life. ”

“ I understand that traditional activities will be allowed to be practiced despite the establishment of protected area status, and support the plan for its value in preserving natural and cultural heritage. ”

The Belief that Local Stewardship or Existing Legislation is Sufficient to Protect the Land

Several people (10.8%) felt that existing legal protections are sufficient to protect the land, or that local people are able to protect the land without government intervention. Coupled with this is the belief by some that there is plenty of untouched wilderness on the Island. Some respondents do not understand the need for additional protection.

“ It's been our land for hundreds of years and many generations have used this land and taken good care of it. ”

“ Crown land permits, hunting licenses, wood cutting permits etc. are all ways the government is already able to effectively manage our environment. Funds to set up these new protected areas would be better used to fund the enforcement of existing forestry and wildlife regulations... ”

“ I believe that there are so many untouched natural areas in Newfoundland and Labrador that we do not require any more protected areas. ”

Concern for Protection of Wildlife, Species, and Habitats

People see the Plan as a way to protect wildlife, including rare or endangered species and habitats (10.7%). Respondents talked about the importance of protecting our provinces wildlife and landscapes.

“ Species (like boreal caribou) are completely gone in other parts of Canada and we can actually stop that from happening here if we set aside some of their habitat. ”

“ There are approximately 300 rivers throughout Newfoundland and Labrador that have wild salmon in them. Unfortunately, of those 300 salmon rivers there are only two that have any formal protection... since 2017, wild salmon stocks throughout Newfoundland and Labrador have seen significant declines. ”

“ Piecemeal development can break up and destroy valuable ecosystems. Consider “It is just a wetland full of common species” until it is the last remnant of undisturbed wetland and its species are rare and endangered. Likewise, old growth forests are irreplaceable. This island is naturally special so let’s keep at least some of it natural for future generations. ”

Economic Development Considerations

There were differing opinions as to how reserves might affect the economic future of communities, regions or the Island. For some respondents (8%), there is a worry that protected areas could increase economic risk, particularly for areas that have seen a downturn in the local economy. For others, the Plan was seen as providing opportunities for economic development and tourism (5.7%). A number of respondents felt that economic opportunities were not considered as part of the planning for protected areas, or in how reserves would be managed.

“ I support the plan although I do not want it to have an adverse effect on the economy. ”

“ We desperately need economic development...If we do not get this development, we will lose our communities. Our young families are slowly moving away and when my son graduates school next year, he will...leave for education and then work. ”

Some people spoke about the role that protected areas can play in building a strong economy. For these respondents, the Plan is seen as an economic opportunity that can benefit rural areas in the long-term. People recommended that government look for ways to support local economic opportunities linked to protected areas.

“ Altogether too often, protection of natural areas and economic development are falsely pitted against each other. Yet, it is obvious that nature is economically critical to our province; tourism depends upon protected areas. Good land use planning protects our special areas and allows for development in non-protected areas. ”

“ These areas potentially represent a lifeline to rural Newfoundland. Gros Morne National Park is an economic powerhouse accounting for about 50% of all out of province visitors. With appropriate marketing, planning and training for local residents, each of these candidate areas could contribute to a more sustainable rural economy. ”

Protection from Development and Destructive Activities

People talked about how creating a system of protected areas under protected area legislation is vital to protecting land from development and destructive activities (7.8%). Additionally, some people spoke of lands that had been lost to development, and how they felt they did not have a say.

“ Spending lots of time in the NL wilderness, I am often surprised about the amount of development that is unseen (from the main roads and highways). There is a significant amount of development, e.g. access roads, industrial activity, etc., that is encroaching on and impacting the natural environment, and it is important that people are aware of this and measures are in place to limit development. ”

“ Unfortunately, without some form of protection our wilderness becomes consumed by corporate industrial harvesting or extraction initiatives. The local land uses and values are never protected from industrial expansion without a regulatory regime having been established to protect our special places. ”

Other Reasons Influencing Support

In addition to the reasons influencing support for the Plan outlined above, the consultation process was also noted as impacting support. A common comment was that people were unhappy that they were not engaged in the development of the Plan to date. There was a significant amount of confusion about the process and misinformation in the public realm about what activities could or would be permitted in future reserves. This is discussed more fully in the section below on the public consultation process.

Regional Differences

Reasons affecting the level of support for the Plan differed by region. Table 4 shows the regional differences to the most common concerns that influenced support for the Plan. Most of the more regionally-common comments are discussed above. Meeting protected areas targets is discussed in the Content section of the Plan. Cabin or land ownership and access are referenced in the section on Reserve Management.

Table 4. **By region, the top three reasons why people did or did not support the Plan, in order of frequency.** Regions delineated by boundaries found in Figure 1. (Phase I consultation on the Protected Areas Plan for the Island of Newfoundland)

Region	Comments
Western/Southwestern	<ol style="list-style-type: none"> 1. Concern that Traditional Activities or Recreation Could be Restricted 2. To meet Protected Areas Targets/ Protection from Development or Destructive Activities
Great Northern Peninsula/ Baie Verte	<ol style="list-style-type: none"> 1. Concern that Traditional Activities or Recreation Could be Restricted 2. Local Stewardship or Existing Legislation is Sufficient 3. Concerns about Impacts to Economic Development
Central	<ol style="list-style-type: none"> 1. Concern that Traditional Activities or Recreation Could be Restricted 2. Concerns about Cabins or Private Land/ Concern about Access
Eastern	<ol style="list-style-type: none"> 1. Concern that Traditional Activities or Recreation Could be Restricted 2. Concerns about Cabins or Private Land 3. Local Stewardship or Existing Legislation is Sufficient
Avalon	<ol style="list-style-type: none"> 1. Concern for Protection of Wildlife, Species and Habitats 2. To meet Protected Areas Targets 3. Protection from Development or Destructive Activities
Other*	<ol style="list-style-type: none"> 1. Concern that Traditional Activities or Recreation Could be Restricted 2. Local Stewardship or Existing Legislation is Sufficient 3. Concern for Protection of Wildlife, Species and Habitats

*'Other' includes those submissions from outside the Province or where location could not be determined.

Key Themes of Submissions

The following sections are organized by key themes that arose from submissions. These include comments and recommendations regarding:

1. The Content of the Plan;
2. Reserve Management; and
3. The Consultation Process.

The Content of the Plan

The most common comment that people had (18.9%) about the content of the Plan was that more land needed to be protected to address gaps and meet protected areas targets. A total of 89 submissions (9.9%) proposed additional protected areas for inclusion in the Plan (see Appendix A for maps of these additional proposed areas). Some respondents (6.9%) thought that too much area was being proposed for protection in the Plan.

WERAC received several detailed submissions outlining some of the strengths and weaknesses of the Plan based on current conservation science. People commended the government for developing a science-based plan for protected areas that will improve protection for natural regions, species, and their habitats.

“ From a conservation perspective, the [Plan] sites are good sites for the establishment of new protected areas. They contain large intact forest landscapes, entire watersheds, caribou habitat, significant wetlands and waterways, important coastal areas, species-at-risk habitat, limestone barrens, older forests, and representative ecosystems. ”

Figure 4 below presents more detail of public feedback on the content of the Plan. Feedback is presented from the most common comments to the least from all unique submissions (both for and against the Plan). The more common perspectives on the content of the Plan are described in more detail below and organized by these themes.

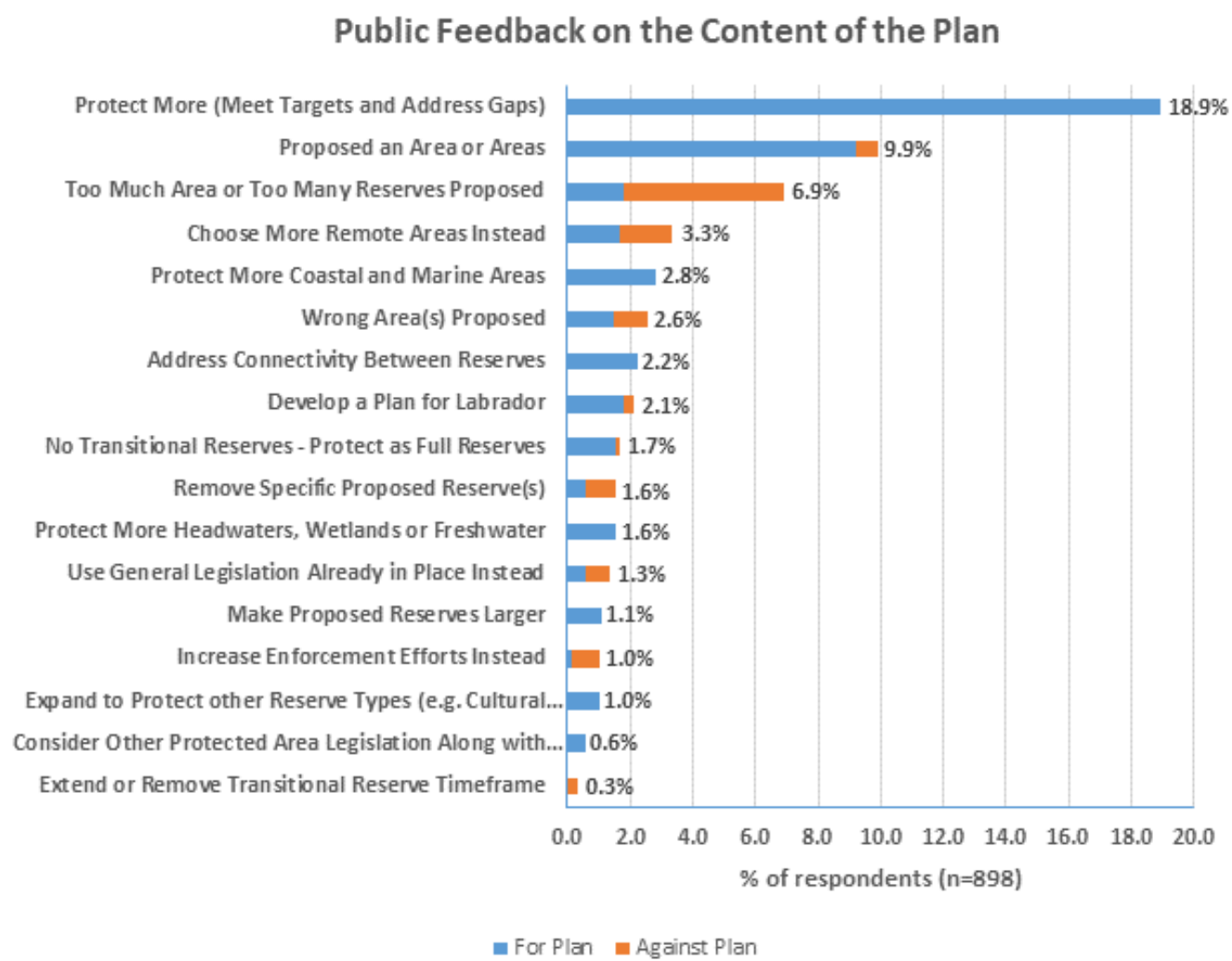


Figure 4. **Public feedback on the content of the Protected Areas Plan for the Island of Newfoundland.** Percentage is calculated based on all 898 unique submissions received by the Wilderness and Ecological Reserves Advisory Council. Information was received through an online questionnaire, email, mail, and phone correspondence during the public consultation period in 2020.

Protect More and Address Gaps

While respondents felt that the Plan was a good start, people (18.9%) wanted more area to be protected. Respondents also noted they wanted the Plan to:

1. Meet or exceed national protected area targets – Canada has recently committed to protect 30% of land and sea by 2030;
2. Protect more of certain natural features (such as coastal areas, salmon rivers and wetlands) or species; and
3. Address connectivity to allow species to move across the landscape and between protected areas.

WERAC received detailed recommendations for improving protection for these natural features.

“ Standing alone, the plan is not ambitious enough to combat the ominous environmental challenges we face in 2020 and we urge you to take further action to protect terrestrial habitats of Newfoundland and Labrador...We continue to find significant declines in some of our most imperiled species, many that call Newfoundland and Labrador home. ”

“ Unfortunately, Newfoundland and Labrador is way behind the rest of Canada with the creation of new protected areas. Currently, only 6.9% of the province is legally protected, and only 6.7% of the Island of Newfoundland. That puts Newfoundland and Labrador at the back of the pack, ahead of only Prince Edward Island and New Brunswick. To be blunt, Newfoundland and Labrador should be doing much better. ”

Consider Additional Areas Submitted by the Public

As a result of the Phase 1 public consultation, members of the public proposed additional areas for protection on the Island. Areas were proposed for a number of reasons, including:

1. To better protect species, and habitats;
2. To protect culturally important areas;
3. As alternatives in more remote areas;
4. To improve connectivity between habitats or protected areas;
5. For improved representation of the 25 natural regions in Newfoundland; or
6. To increase the size or shape of the proposed reserves to reduce edge effects (an abrupt transition between a natural habitat inside a reserve and a disturbed habitat outside a reserve).

Altogether, WERAC received 89 submissions proposing an area or areas for the Island of Newfoundland. These submissions proposed an additional 118 areas, including new proposed areas, changes to proposed reserves, or proposed protection of natural features (such as salmon rivers). Appendix A includes maps of the proposed areas submitted by the public. There were a number of submissions that targeted waterfowl areas and these are shown in a second map for more clarity.

Protect Fewer Areas

Some people (6.9%) felt that too much area or too many reserves were being proposed in the Plan as a whole or in a specific region. This was a key concern for those in the Great Northern Peninsula/Baie Verte region, and to a lesser extent, for those in Central region and Western/Southwestern Newfoundland region. Where people communicated that they felt too much was being proposed, sometimes these comments were connected to a concern that protecting these areas would mean a loss of traditional activities.

“ My concern is not whether there needs to be more protected areas in Newfoundland, but why the majority of those protected areas are located on the Great Northern Peninsula. ”

“ Too much area proposed, taking away our rights to spend leisure time in our beautiful country. ”

Choose More Remote Areas

Respondents spoke about how some of the proposed reserves are used for cabins and outdoor recreation. Several people (3.3%) felt that more remote areas should be chosen instead. Combined with this sentiment is a belief expressed by some that the Island of Newfoundland still has a lot of untouched wilderness. Rodney Pond, Gambo Pond, and Random Island proposed reserves were most frequently mentioned as being used by the public for cabins and outdoor recreation. For reference, a map of the reserves proposed in the Plan is in Appendix B.

“ Protected land should not include land already occupied. I feel our province has vast areas of land that is not occupied by cabin owners or home owners that can be protected without disrupting people's lives. ”

“ Protect land where no one uses it. ”

Regional Differences

Public opinions on the content of the Plan differed by region. Table 5 shows the diversity of public opinion about the Plan, even within a region. For example, the top three comments for a single region could include, 'Protect More Area' and at the same time, 'Too Much Area Proposed'.

Table 5. **By region, the top three comments about the content of the Plan, in order of frequency.** Regions delineated by boundaries found in Figure 1. (Phase I consultation on the Protected Areas Plan for the Island of Newfoundland)

Region	Comments
Western/Southwestern	<ol style="list-style-type: none">1. Protect More Area (Meet Targets and Address Gaps)2. Proposed an Area or Areas3. Too Much Area or Too Many Reserves Proposed
Great Northern Peninsula/ Baie Verte	<ol style="list-style-type: none">1. Too Much Area or Too Many Reserves Proposed2. Protect More Area (Meet Targets and Address Gaps)3. Proposed an Area or Areas
Central	<ol style="list-style-type: none">1. 1Proposed an Area or Areas2. Protect More Area (Meet Targets and Address Gaps)3. Too Much Area or Too Many Reserves Proposed
Eastern	<ol style="list-style-type: none">1. Choose More Remote/Less Used Areas2. Remove Specific Proposed Reserve(s)3. Protect More Area (Meet Targets and Address Gaps)
Avalon	<ol style="list-style-type: none">1. Protect More Area (Meet Targets and Address Gaps)2. Proposed an Area or Areas3. Protect More Coastal and Marine Areas
Other*	<ol style="list-style-type: none">1. Too Much Area or Too Many Reserves Proposed2. Protect More Area (Meet Targets and Address Gaps)3. Proposed an Area or Areas

*'Other' includes those submissions from outside the Province or where location could not be determined.

Reserve Management

Respondents spoke about how they currently use the areas proposed as wilderness or ecological reserves. People said they wanted to continue traditional activities generally, or provided details on what activities were important to them. If someone mentioned an activity they take part in, it was assumed that they wanted that activity to continue. The most common recommendations for reserve management were to continue hunting, fishing, and trapping (31.2%), continue snowmobile use generally or on trails (17.7%), and to maintain access, upkeep, and sale of cabins

or land (13.7%). Additionally, 17.5% of respondents offered a variety of opinions on how ATVs should be managed in reserves. Figure 5 presents more detail of public feedback on reserve management in the proposed reserves.

Figure 5. **Public feedback on management in reserves proposed in the Protected Areas Plan for the Island of Newfoundland.** Percentage is calculated based on all 898 unique submissions received by the Wilderness and Ecological Reserves Advisory Council. Information was received through an online questionnaire, email, mail, and phone correspondence during the public consultation period in 2020.



A discussion of the more common recommendations is included below. Common themes arose when the submissions were assessed. The discussion on reserve management in proposed reserves is organized by these themes.

Continue Traditional Activities

Respondents shared how important traditional activities are to their identities, culture, and survival. Some people recommended that traditional or low-impact activities continue generally (6%) but did not specify which activities were important.

Respondents expressed a deep connection with the land being proposed for protection. That connection to the land can go back generations and that history is a source of pride. Respondents also communicated a desire to continue to be able to experience those areas as they have, and pass along that connection and experience and knowledge to future generations.

“ My son and daughter have been going to the [proposed reserve] their whole lives and over the past two years I have had the privilege of introducing my grandson to the wonder and beauty of an area his ancestors have been working and playing in for six generations. My first trip to the [proposed reserve]...was with my father in the back of a komatik when I was four years old. My love for the area has grown more and more over the years. ”

“ All of my family has been born and raised here, and our land has been our most prized possession. For myself, this land has taught me everything I know. Although I am only a young man, I have covered every inch of this beautiful landscape, and it holds more value to me than its weight in gold. I want to raise a family here, and pass on to my children the same things that were passed down from generations before me...I want to live here forever, I want my children to live here forever, and I will always respect my land. ”

Continue Hunting, Fishing and Trapping

A total of 31.2% of respondents recommended that hunting, fishing, and trapping continue in the proposed reserves.

“ I am an avid outdoorsman and hunter. Our people depend on the lands around us to sustain our ways of life. ”

“ I have grown up in this area and I am very aware of the financial struggles faced by many people in our communities. Living [here] means it is often difficult to purchase fresh meat and fresh produce because it is not available or it is just too expensive to afford. As a result, many people choose to hunt, fish, and pick berries to enable them to have enough food on the table and money to pay their bills. ”

Continue Snowmobiling

Another common recommendation (17.7%) was that snowmobiling continue in the proposed reserves, either on trails or generally.

“ We use our cabin year round ...We need access to get there. We can drive in the spring into the fall, but need to snowmobile in the winter. If we lose any of the roads we will lose our access. ”

“ I also use ...snowmobiles in all of these proposed areas. I hope to continue to use these areas for many years to come, and will also protect these areas so they are there for future generations to enjoy. ”

Maintain Cabins

The ability to access, upkeep, and sell cabins was also a common concern (13.7%). People talked about the need to continue to enjoy their cabins in the way that they currently do. Some respondents were concerned that the proposed reserves might restrict access, or negatively affect their ability to upkeep, expand, or sell their cabins. For those without legal title, people wanted to make sure that they would not lose their cabins or land. Others wanted to be able to build future cabins in the proposed reserves, or wanted to stop unregulated cabin development.

“ We have a cottage and along with more than a dozen other cottage owners... we would not expect to lose our traditional means of access nor... would we want to disturb any additional unused land. ”

“ There is a lot of cabins and land owned by people that the government won't have documents of because they were all lost in a fire many years ago that took place in St. John's... I am all for protecting Newfoundland's beautiful nature and wildlife, but many land and cabin owners (such as myself) in the area are concerned about the government taking the land that's rightfully theirs. ”

Continue Non-motorized activities, Berrypicking, and Other Foraging

Some people (12.4%) talked about how it was important to be able to continue non-motorized activities such as biking, horse-back riding, canoeing, kayaking, skiing, hiking, and swimming in the proposed reserves. Berrypicking or other foraging was also an important activity for people to be able to continue (10%).

“ I am so grateful we were able to return here to raise our family. We walk the same paths my grandparents walked, and we have taken our children to many of these places. We make new discoveries and we return to our favourite spots. We hike, we camp, we pick berries, we ski, we watch whales and birds. We delight in being out on the land, knowing it is unchanged and undamaged and available to share. ”

Continue Firewood Collection

Collection of firewood was also considered important (11.5%), with recommendations made that people be able to continue to collect firewood in reserves, according to current regulations.

“ Seniors burn wood and that’s where it comes from. People ... are making their living cutting wood and supplying it to people for home heating. Hydro bills are increasing. The biggest concern is how this going to impact seniors. This activity is a necessity. ”

Manage ATVs

There were conflicting views around ATV use in proposed reserves. People recommended continuing ATV access with or without any additional restrictions (8.2%), continuing ATV use on existing roads or trails only (3.8%), not continuing ATV use in reserves at all (2.5%), continuing ATV use for the collection of moose (1.8%), or continuing ATViing without any additional restrictions (1.3%).

“ I still want to go [into the proposed reserve] on ATV. ”

“ I’d like to see the continuation of the use of ATV’s for the purpose of game retrieval, where its use won’t have a negative impact on the sensitive areas, as well as the continued ATV use on registered trails to access cabins in protected areas. ”

“ ATV use can be very destructive to bogs and fens and other sensitive ecosystems, and can damage rare plants. Even where well-established trails exist, riders frequently leave trails to travel off-trail so I would like to see their use prohibited or limited in reserves containing sensitive ecosystems. ”

“ There needs to be immediate action to address the critical problem of unrestricted ATV use in the province ...Vast areas of the provinces natural environment, including wetland ecosystems, have been and continue to be destroyed. Many areas have been decimated... There is absolutely no enforcement of ATV regulations...In many areas it now difficult to get around on foot because the marshes have been turned into gutter swamps. ”

“ I do not believe there should be any restrictions [on ATV use] other than those already in force through legislation. ”

Continue Outfitting in Reserves

A small number of people made reference to outfitting (1.5%). Most said they wanted outfitting to continue in proposed reserves or they wanted reserve management to support outfitting operations. It was recommended that government work directly with outfitters in proposed reserves to make sure that reserve management supports their particular needs.

“ For site-specific consultations, each outfitter should be identified and contacted by WERAC. [Management of outfitting in reserves] will come down to the input from independent operators. Each case will be different. ”

Support Effective Management

Several people spoke of how the reserves will need to be well-managed to be successful. For some this meant ensuring that the reserves are monitored and the rules enforced (3.3%), and for others this meant that staff are onsite to provide interpretation (1.1%). Respondents also advised that management should balance access and activities with a need to protect those elements that make the reserve important.

“ ‘It is exceedingly clear that for something... to have a relevance there must be a [staff] presence...whenever there has been staff presence/ involvement in a protected area, there is the greatest acceptance and support for protected areas [e.g. Cape St. Mary’s, Mistaken Point]. ”

“ The province must balance the needs of all parties... ”

Regional Differences

Public opinions on reserve management differed somewhat by region. Table 6 shows how hunting, fishing and trapping and snowmobile use are important for each region. For Eastern and Central regions, the ability to continue to access, upkeep and sell a cabin or land are important. For the Avalon and Western/Southwestern regions, non-motorized activities are a priority. For the Great Northern Peninsula/Baie Verte region, firewood collection is important.

Table 6. **By region, the top three recommendations for management of reserves proposed in the Protected Areas Plan for the Island of Newfoundland.** (Phase I consultation on the Protected Areas Plan for the Island of Newfoundland)

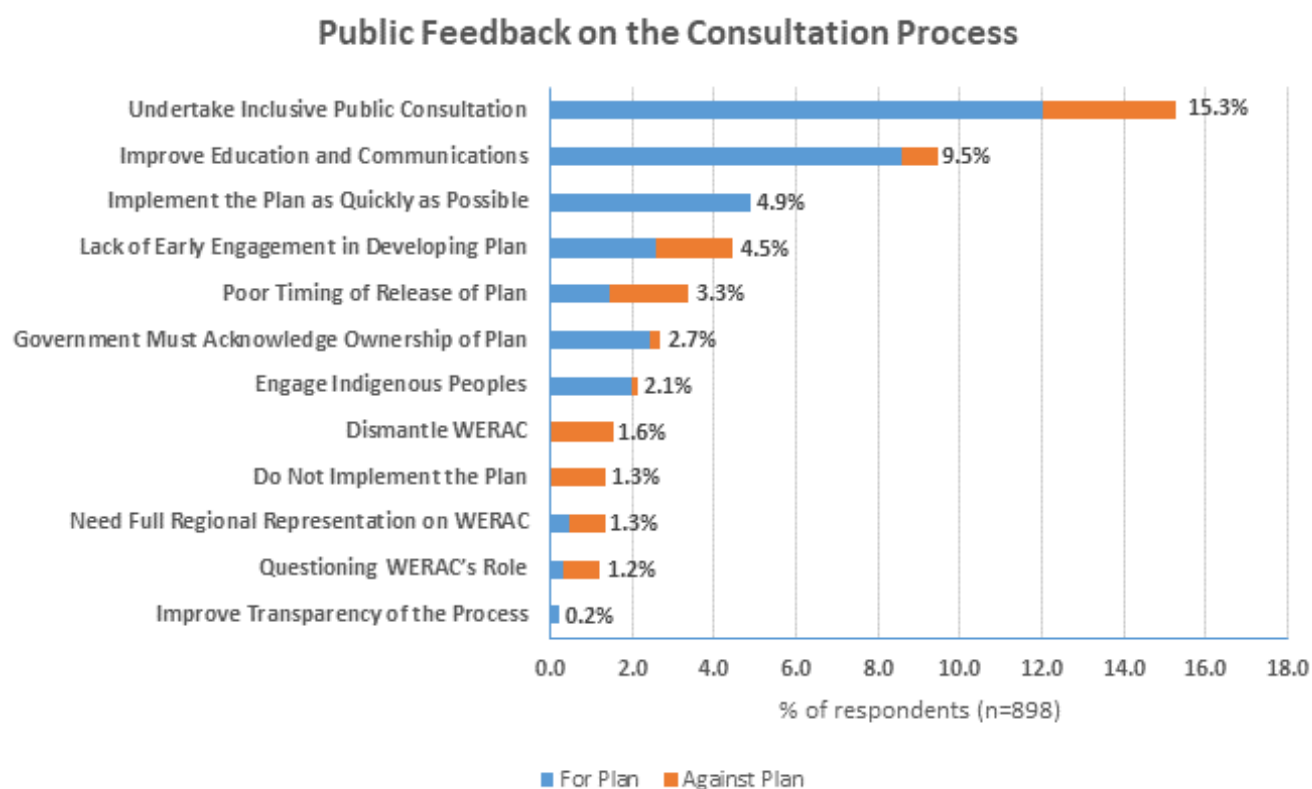
Region	Comments
Western/Southwestern	<ol style="list-style-type: none"> 1. Continue Hunting, Fishing and Trapping 2. Continue Snowmobile Use Generally or on Trails / Continue Non-Motorized Activities (biking, hiking etc.)/ Continue Berry picking and Other Foraging
Great Northern Peninsula/ Baie Verte	<ol style="list-style-type: none"> 1. Continue Hunting, Fishing and Trapping 2. Continue Snowmobile Use Generally or on Trails 3. Continue Firewood Collection
Central	<ol style="list-style-type: none"> 1. Continue Hunting, Fishing and Trapping 2. Continue Snowmobile Use Generally or on Trails 3. Maintain Access, Upkeep and Sale of Cabins or Land
Eastern	<ol style="list-style-type: none"> 1. Continue Hunting, Fishing and Trapping 2. Maintain Access, Upkeep and Sale of Cabins or Land 3. Continue Snowmobile Use Generally or on Trails
Avalon	<ol style="list-style-type: none"> 1. Continue Hunting, Fishing and Trapping 2. Continue Non-Motorized Activities (Biking, Hiking, etc.) 3. Continue Snowmobile Use Generally or on Trails
Other*	<ol style="list-style-type: none"> 1. Continue Hunting, Fishing and Trapping 2. Continue Snowmobile Use Generally or on Trails 3. Maintain Access, Upkeep and Sale of Cabins or Land

*'Other' includes those submissions from outside the Province or where location could not be determined.

The Consultation Process

Across all regions, respondents wanted the Government of Newfoundland and Labrador and WERAC to undertake a more inclusive public consultation process (15.3%), improve education and communications (9.5%), and implement the Plan as quickly as possible (4.9%). There was also notable support (45%) for moving forward with local public consultations (via Phase 2). Figure 6 presents more detail on comments received about the consultation process. The petition and form letters also recommended inclusive public consultations and, for the petition, improved transparency.

Figure 6. **Public feedback on the consultation process associated with the Protected Areas Plan**



for the Island of Newfoundland. Percentage is calculated based on all 898 unique submissions received by the Wilderness and Ecological Reserves Advisory Council. Information was received through an online questionnaire, email, mail, and phone correspondence during the public consultation period in 2020.

Some of the more common perspectives about the consultation process are explored in more detail below. Common themes arose when the submissions were assessed. The discussion on the consultation process is organized by these themes.

Make Future Planning Processes Public

Several respondents (4.5%) explicitly stated that the Plan should have been developed with early engagement of people who would be most affected by the proposed areas. There is a sense that not doing so made people feel like their local perspectives, knowledge, and experience were not valued.

“ Citizens have been kept in the dark for 25 years and are now asked to express their opinions, concerns and suggestions within a fairly short period of time. This lack of communication generated mistrust in the plan, fueled by fears based on misinformation. The communities of Newfoundland and Labrador should have been involved at the early stages of the process. ”

“ Nowhere else in Canada is there a top-secret protected areas plan that has been hidden from public view for so long. Many of the [Plan] sites under consideration today for protection have actually been managed by the government as interim parkland for several decades. But the public was never made aware of the location of these hidden protected areas...This type of approach leads to all sorts of problems. It undermines trust that the public has in government decisions on conservation and makes communities far more suspicious of what protection actually means. ”

Engage Indigenous Peoples

Some individuals and Indigenous organizations (2.1%) felt that the process failed in not engaging Indigenous peoples earlier. Respondents spoke of the need for Indigenous peoples to be truly engaged in the process moving forward.

“ When the Protected Areas Plan...was publicly released, the Indigenous community were surprised that they were not consulted beforehand. Indigenous people are the protectors of this land and we should have been involved in identifying sites... ”

“ Nowhere does the document reference engagement or consultation with the Indigenous people of Newfoundland... ”

“ We are supportive of land protection in principle, but it must be done the right way, and with...full participation and access... ”

Improve Education and Communications

Respondents commented (9.5%) that they were concerned about how the Plan was communicated to the public. Some felt that not having enough education beforehand and easy-to-read communications led to the spread of misinformation. People suggested ways of improving communications for Phase 2, and recommended that resources be provided to WERAC and government to do this. Respondents wanted to see more public education about the Plan, the need for protected areas in this province, and reserve management.

“ ...it has been really hard to see my community speak out against something that is so important to me- the protection of our land for future generations. The way the plan was released led to a lot of backlash and misinformation spreading around my community. ”

“ Better communication needs to be part of future conversations / consultations on this plan. In listening to people criticize the plan on the radio, the reasons they give (i.e. this place is a special wilderness and we do not want to be denied access) are the very reasons for protecting these places. It seems like the plan was released with very little in the way of accompanying communications. ”

“ In addition to community consultations, public education about the plan and the benefits of protected areas should be included as a follow up to this plan. Education will help members of public who are less familiar with the ecological and economic motivations for protected areas make informed decisions. ”

Respondents (2.7%) also wanted provincial government to acknowledge ownership of the Plan moving forward, and clarify its role. The impression was that many people were not aware that the Plan was developed by the Government of Newfoundland and Labrador.

“ I’m perplexed why the government is referring to the plan as a WERAC plan, when clearly it is a government plan. WERAC is merely undertaking the public consultation for the government plan.... It’s also contained in the publicly-available Ministerial Mandate Letters. The government should clarify that the protected areas plan is, in fact, a government plan. ”

Learn from Other Phase 1 Consultation Concerns

People (15.3%) were concerned that the Phase 1 public consultation was insufficient and there needed to be more public consultations going forward. There was also a misunderstanding among some about how much consultation would be required for protected areas to be created. It did not appear to be clear that the Phase 1 consultation was not the only opportunity for the public to provide input.

“ You should be holding public consultations and explain to the people exactly what is in the report. Many in our town and/or our seniors [do] not have access or are familiar with using the internet but have valuable contributions to make regarding this matter. ”

Some respondents (3.3%) felt that the timing for release of the Plan was poorly chosen. People were already stressed due to the COVID-19 global pandemic health crisis, and for some, this was seen as one more thing to worry about.

Ensure Local Engagement in Public Consultations

Of the 407 respondents who mentioned public consultations, regardless of whether they supported the Plan, 99.7% were in favour of moving forward with more inclusive local public consultations (i.e. Phase 2). The form letters and the petition also recommended local public consultations and an inclusive public engagement process for future protected areas planning. Some people questioned whether their opinions would truly matter to the outcome, and feared that government would change the rules once a reserve is protected. Submissions also recommended carrying out local public consultations in a way that ensures as many people as possible are involved.

“ From an environmental perspective, this is an incredibly valuable thing we can do as a province, but we need to make sure that the proper consultations and discussions take place so that communities feel included in and benefit from the plan - and that hasn't happened yet. ”

“ Community consultations will be critical in confirming the areas to be protected and finalizing the boundaries of the protected areas. ”

“ The feeling to a lot of people is that if this goes through then myself and the general public will not have any say in the matter. Even though you say there will be public consultations, that doesn't mean anything will change. I think most would have an easier time accepting change if we knew exactly what would change rather than let's put this through and see what happens then. ”

Implement the Plan as Quickly as Possible

Some people (4.9%) felt that it was important to move forward with implementation as soon as possible. Others expressed concern about the time it will take to develop and implement a plan for Labrador.

“ The longer NL remains without a legislatively approved and socially acceptable protected areas plan ..., options for protected areas will effectively diminish. Development proposals are submitted on a regular basis to the Government of NL - mining, forestry, hydroelectric development, aquaculture, agricultural lands, etc. The longer one waits, the less the number of available areas are open to [protected area] development. ”

“ With only a vague promise that areas in Labrador will be considered at some future time, I have no confidence that the government will get to that any time soon (as in the next 20 years). ”

Regional Differences

Public opinions on the consultation process were fairly consistent across regions. For all regions, inclusive public consultations and improved education and communications were the most frequent recommendations. For the Avalon region and where location was unknown or outside the province, timely implementation of the Plan was also important. For the Eastern, Central, Great Northern Peninsula/Baie Verte, and Western/Southwestern regions, a lack of early engagement in development of the Plan was a key concern with the consultation process.

Summary and Next Steps

This public consultation has provided a snapshot of the sometimes very different perspectives on the proposed Protected Areas Plan for the Island of Newfoundland. There are also regional differences in these perspectives.

Although there is a significant amount of support for the Plan, many respondents see it as not going far enough. Still others felt that too much was being proposed for protection.

Respondents commonly expressed support for the concept of protecting wilderness and nature. However, people also worried about what living next to a protected area might mean for their own livelihood and lifestyle. A number of respondents saw the Plan as another hardship that would need to be borne by rural communities, alongside a lack of economic development, outmigration, an aging population, and an increasing cost of living. Others saw the Plan as a way to address these hardships, if government and communities can take advantage of the economic opportunities afforded by protected areas.

Some people explained that there is a history of complicated relationships between the government and the public in this province. Several people feared that government will not give a voice to local people in how reserves are managed once they are established. There is, among some, a distrust in WERAC, and people communicated fears about the process. Particularly for those in the Great Northern Peninsula/Baie Verte region, people felt that government often has not considered the opinions of local people. People commented that past consultations didn't change the decisions that were made, and they felt the same would happen in this process. Some respondents also felt that there is an inequality in how much area is proposed for protection in that region.

Amongst the conflicting ideas about how much should be protected, or how reserves might be managed, there is some common ground for most respondents regarding the Plan.

Connection to the land, traditional activities and supporting rural life

Many respondents, both those in support of and against the Plan, communicated a deep love of and respect for the land, and nature. People expressed a desire to ensure that these lands are still there for future generations, for people to be able to continue to use the land as they do now.

People talked about how important it is to protect traditional activities and maintain access in the proposed reserves, and to respect the fact that people who have cabins will want to continue to use them.

Whether for or against the proposed reserves, people commented on the importance of supporting local economies, food security, and finding opportunities to support the survival of rural communities. Local communities want to receive long-term economic benefits from the proposed reserves. Incorporating economic opportunities should be a key part of management planning for future reserves.

Education and Communications

Most people wanted to see more communications, publicity, and education about the Plan. There is a crucial need to do more education about the importance of protecting natural landscapes in Newfoundland and to outline the status of wild spaces, species, and habitats in the province. Many people did not seem to know that there is not much intact wild space left on the Island, or that the province ranks 3rd lowest in Canada for protected areas.

Phase 2 Public Consultations and Engagement

Most respondents, whether for or against the Plan, expressed a need for further local public consultations and asked that the consultations engage those living next to proposed reserves. People want government and WERAC to work together with local people to plan reserve boundaries and how the proposed reserves would be managed.

There is notable support for moving forward with Phase 2 consultations. However, there is also a need to clarify for the public how proposed reserves will be established, how people will be consulted, and how reserves might affect those who live nearby.

Next Steps

Future engagement and consultation needs to directly involve those affected by the proposed reserves. The process must be responsive to the existing economic and social context and historical connections people have to the land. Trust has to be built between WERAC and local communities. People have to see that the process that unfolds is inclusive, and takes their concerns and needs into consideration. Communities need to see that their perspectives are heard.

Under the WER Act, there must be formal Phase 2 public consultations for each proposed reserve prior to reserve establishment. WERAC will submit a Recommendation Report to government, and government will provide direction to WERAC on next steps. If directed by government, WERAC will conduct a Phase 2, local site consultation process for each proposed reserve to determine:

- 1) Whether a reserve can work for local people;
- 2) Where the reserve boundary should be; and
- 3) Management approaches for existing activities and any special protective measures.

A Protected Areas Plan for Labrador will also need to be developed. WERAC looks forward to working with Labradorians and all residents of the Province on developing a Protected Areas Plan for Labrador once directed to do so by government.

Appendix A1 (Map 1 of 2):

Additional areas proposed by the public for protection on the Island of Newfoundland, other than wetland and waterfowl areas

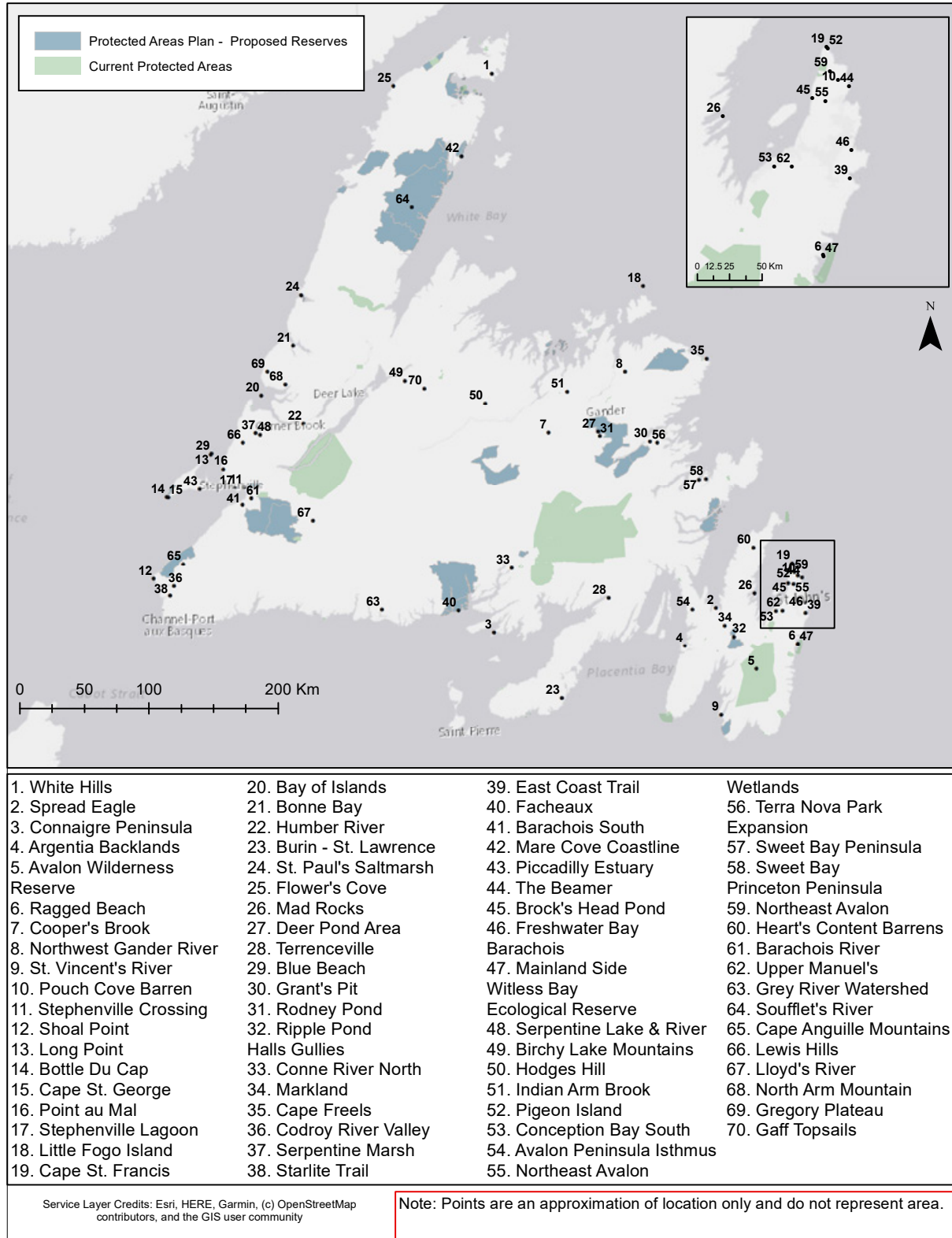


Table A. **Natural areas proposed for protection by the public as additions to sites proposed in the Protected Areas Plan for the Island of Newfoundland, other than to protect wetlands and waterfowl.** Submissions were received during the public consultation period in 2020.

Map reference	Site name	Reason for protection
1	White Hills	natural area
2	Spread Eagle	natural area
3	Connaigre peninsula	scenic area
4	Argentia backlands	natural area
5	Avalon Wilderness Reserve	resource extraction buffer around reserve
6	Ragged Beach	proximity to seabird colony, coastline preservation, threat of development
7	Cooper's Brook	relatively untouched ecosystem
8	NW Gander River	Protect waterway and river valley
9	St. Vincent's beach	tern nesting area, current ATV disturbance
10	Pouch Cove Barren	natural area
11	Stephenville Crossing	nesting birds, migratory bird stopover, protection from clam harvesters
12	Shoal Point	migratory bird stopover
13	Long Point	migratory bird stopover
14	Botte du Cap	migratory bird stopover
15	Cape St. George area	migratory bird stopover
16	Point au Mal	nesting terns, current ATV disturbance
17	Stephenville lagoon	migratory bird stopover
18	Little Fogo Islands	protect for continuation of low impact activities
19	Cape St. Francis	protect for continuation of low impact activities
20	Bay of Islands	improve regional representation
21	Bonne Bay	protect waterbody, compliments Gros Morne NP
22	Humber River	improve regional representation
23	Burin-St. Lawrence	protect from resource extraction, improve regional representation

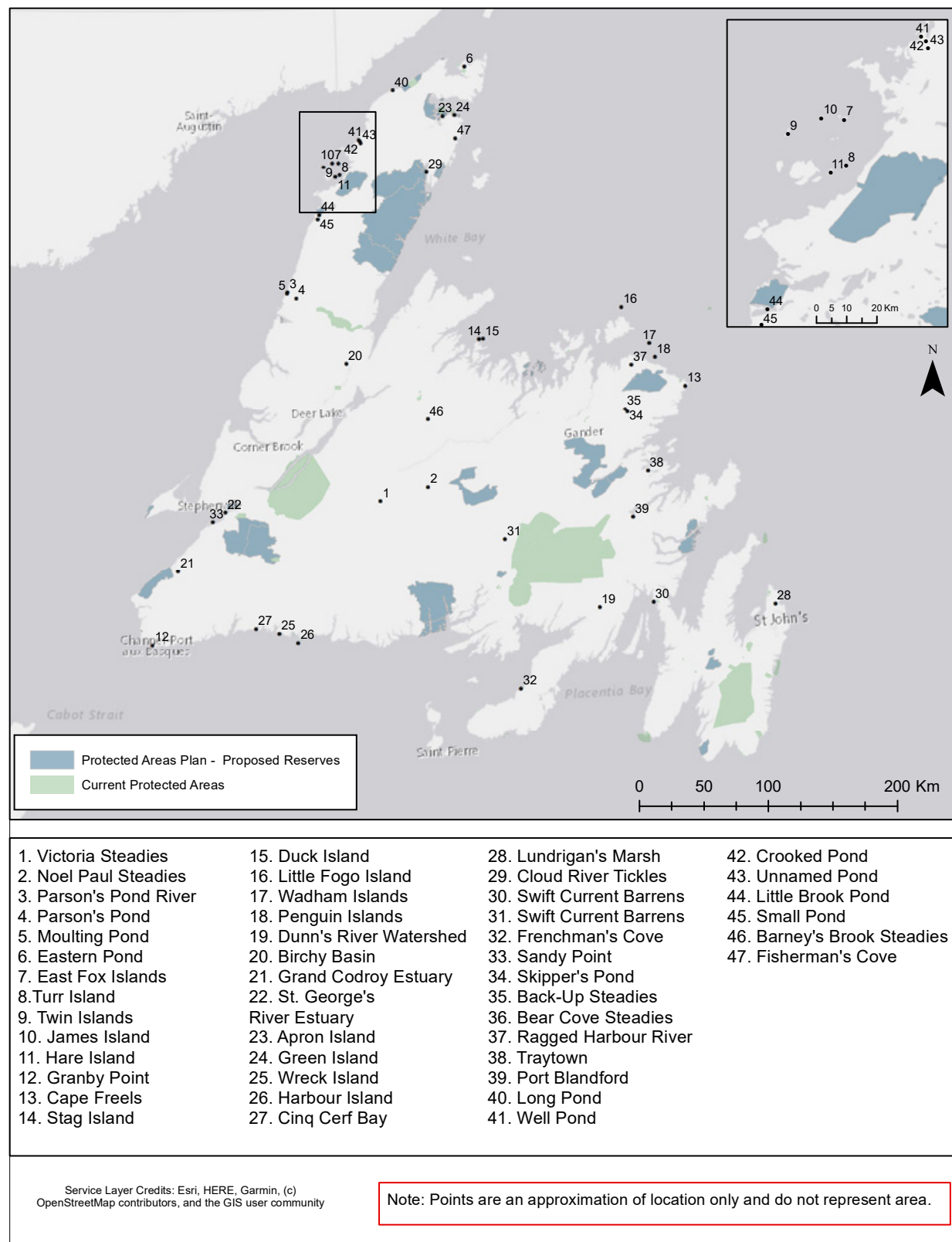
24	St. Paul's saltmarsh	migratory bird stopover
25	Flower's Cove	fossil site
26	Mad Rocks	ecosystem protection
27	Deer Pond area	alternative area to avoid Rodney Pond cabin conflicts
28	Terrrenceville	improve regional representation, protect from resource extraction
29	Blue Beach	unique ecosystem
30	Grant's Pit	natural red pine stand
31	Rodney Pond	commercial harvest area
32	Ripple Pond-Halls Gullies	connectivity between proposed reserves
33	Conne River North	reserve extension to include more watershed
34	Markland	protect from threat of development and for continuation of low impact activities
35	Cape Freels	unique ecosystem
36	Codroy River Valley	habitat protection
37	Serpentine marsh	habitat protection
38	Starlite Trail	habitat protection of yellow birch forest
39	East Coast Trail	development threat, allow continued trail expansion
40	Facheaux Bay	inclusion of coastal zone in proposed reserve
41	Barachois South	inclusion of coastal zone in proposed reserve
42	Mare Cove	inclusion of coastal zone in proposed reserve
43	Piccadilly Estuary	nesting birds, migratory bird stopover/staging area, disturbance from clam harvesters
44	The Beamer	natural area
45	Brock's Head Pond	natural area
46	Freshwater Bay Barachois	natural area
47	Mainland side Witless Bay Ecological Reserve	development threat
48	Serpentine Lake and River	natural area
49	Birchy Lake mountains	natural area
50	Hodges Hill	natural area
51	Indian Arm Brook	natural area

52	Pigeon Island	seabird colony
53	Conception Bay South	development threat
54	Avalon Peninsula Isthmus	protect ecosystem/wetland
55	Northeast Avalon wetland	protect ecosystem and for continuation of low impact activities
56	Terra Nova National Park expansion	protected area extension
57	Sweet Bay peninsula	relatively untouched natural area
58	Sweet Bay-Princeton Peninsula	relatively untouched natural area
59	NE Avalon	development threat
60	Heart's Content Barrens	unique geology
61	Barachois River	protect salmon and angling opportunities
62	Upper Manuel's	development threat
63	Grey River watershed	watershed protection
64	Soufflet's River	watershed protection
65	Cape Anguille mountains	natural area
66	Lewis Hills	natural area
67	Lloyd's River	natural area
68	North Arm Mountain	natural area
69	Gregory plateau	natural area
70	Gaff Topsails	natural area

<p>General areas requiring delineation / further evaluation</p>	<ul style="list-style-type: none"> • Central Newfoundland wilderness • representation on Bay de Verde Peninsula • caribou calving grounds north of the Highlands of St. John • marine protected areas and coastal areas • hiking trails on Crown land • buffer zones and corridors around towns and parks • salmon bearing watercourses • all of the non-residential interior of province • caribou areas and calving grounds • representation on central and south coast • representation on the Cape Shore (Maritime Barrens Ecoregion) • wetland areas of the Avalon • major watersheds, waterways and coastline • connectivity between protected areas • representation of NE Barrens Subregion in association with the Geopark • lands of the Indigenous peoples, burial grounds and traditional areas • east side of Island close to metropolitan areas • representation on Burin Peninsula • pristine areas of the Avalon • along highway from Corner Brook to Port aux Basques • along highway to Harbour Breton • Southwest coast • wetlands • uninhabited islands • sites based on a gap analysis • buffer zone of East Coast Trail • estuaries • representation of SW boreal forest • staging areas of shorebirds and waterfowl • Labrador protected areas • Wilderness Reserve status for Middle Ridge Wildlife Reserve
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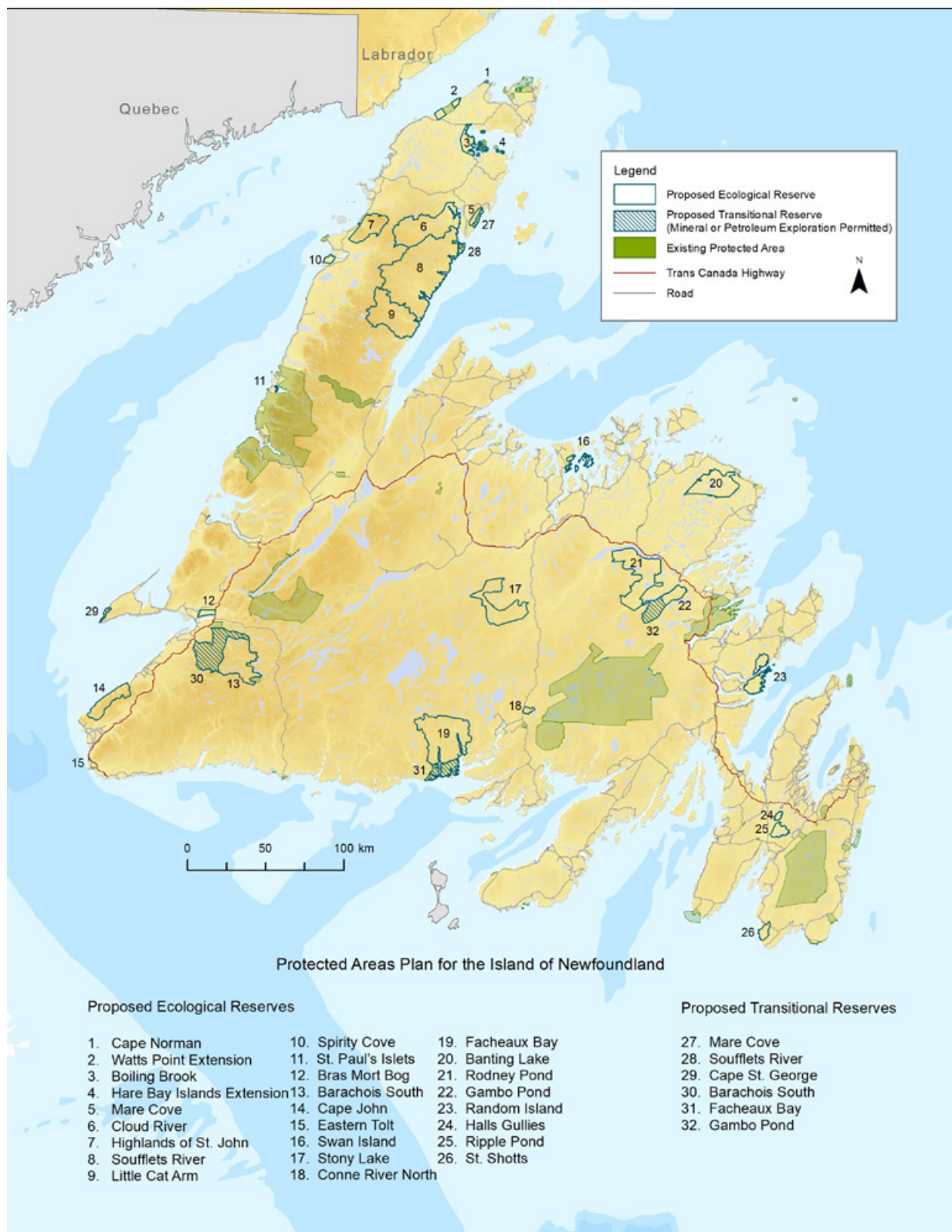
Appendix A2 (Map 2 of 2):

Additional wetland or waterfowl areas proposed by the public for protection on the Island of Newfoundland



Appendix B:

Reference Map of existing reserves and reserves proposed in the Protected Areas Plan for the Island of Newfoundland





Appendix C. Island Human Footprint Analysis/Development Considerations Maps

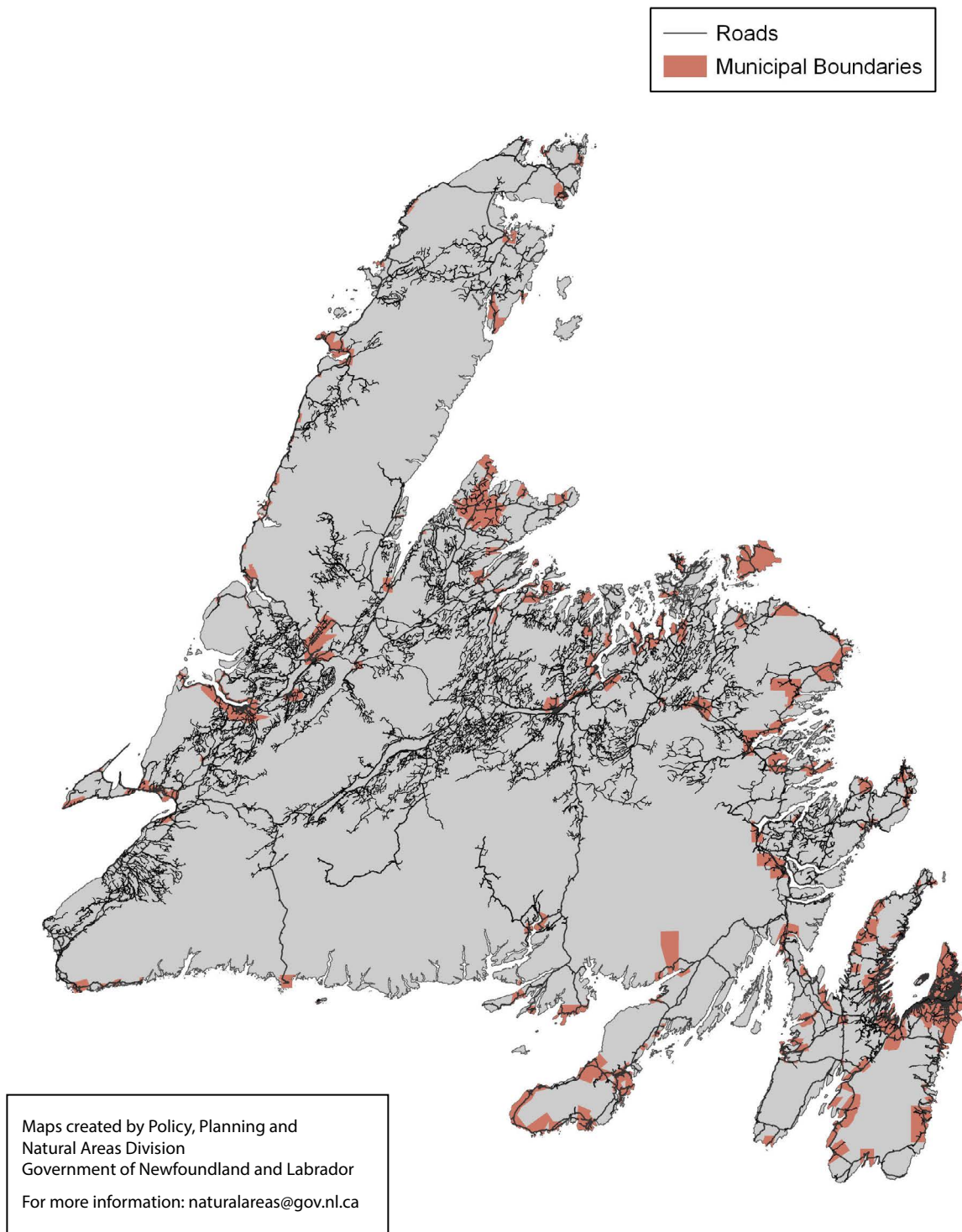


Figure Ci. Human Footprint Analysis/Development Considerations for the Island of Newfoundland, 2020 (with no buffer on development) including roads and municipal boundaries.

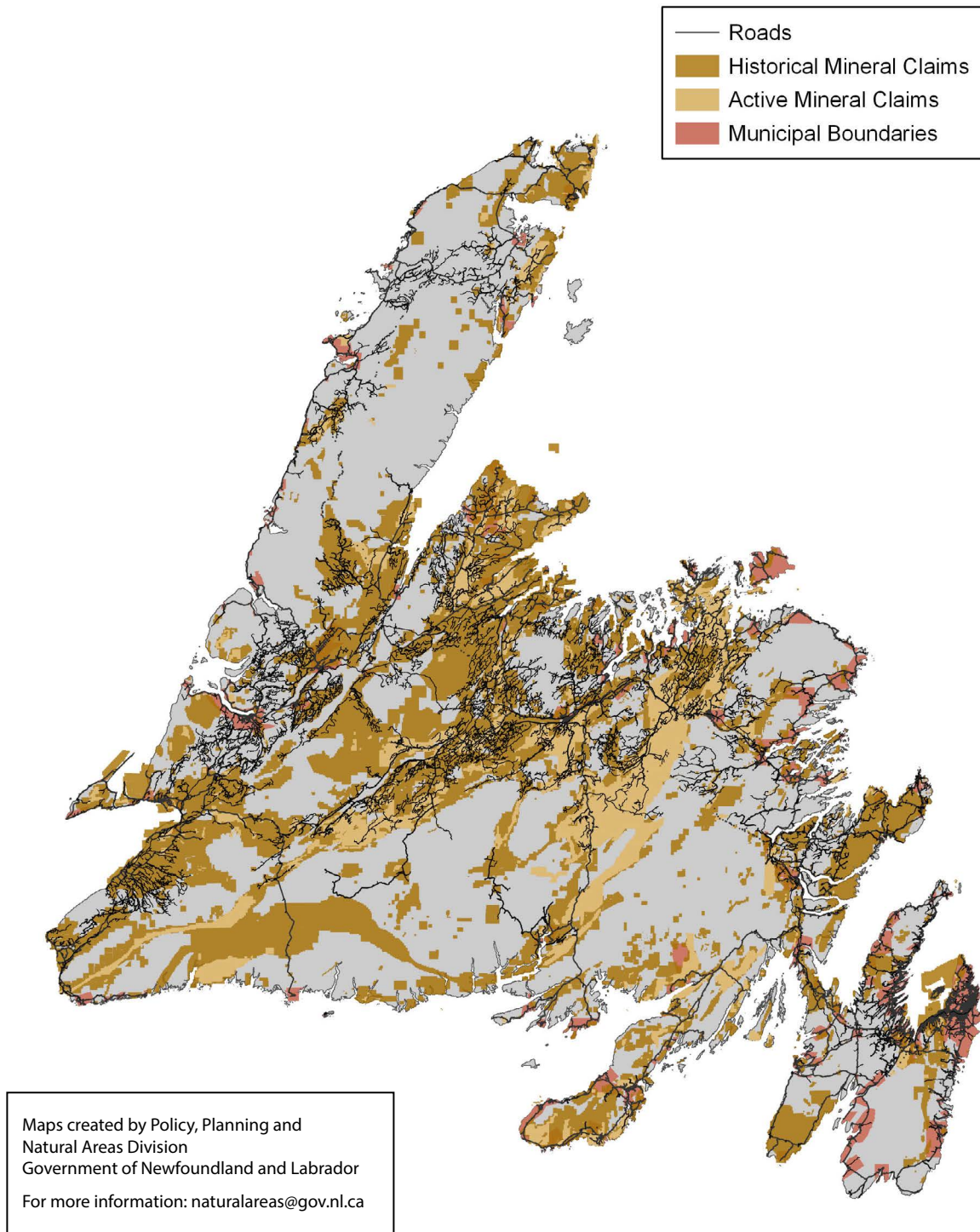


Figure Cii. Human Footprint Analysis/Development Considerations for the Island of Newfoundland, 2020 (with no buffer on development) including roads, municipal boundaries and all active and historical mining claims.

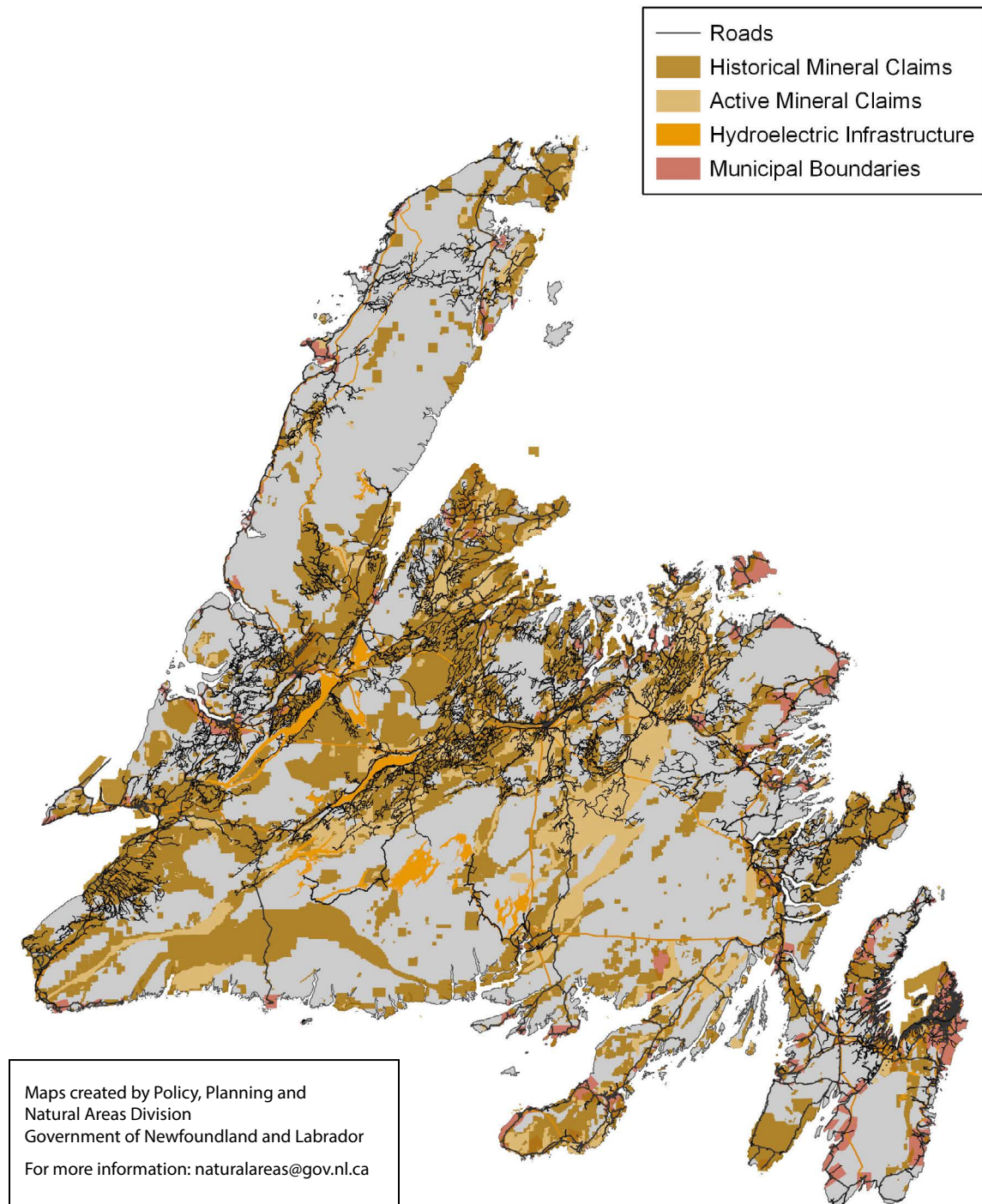


Figure Ciii. Human Footprint Analysis/Development Considerations for the Island of Newfoundland, 2020 (with no buffer on development) including roads, municipal boundaries, hydroelectric infrastructure and all active and historical mining claims.

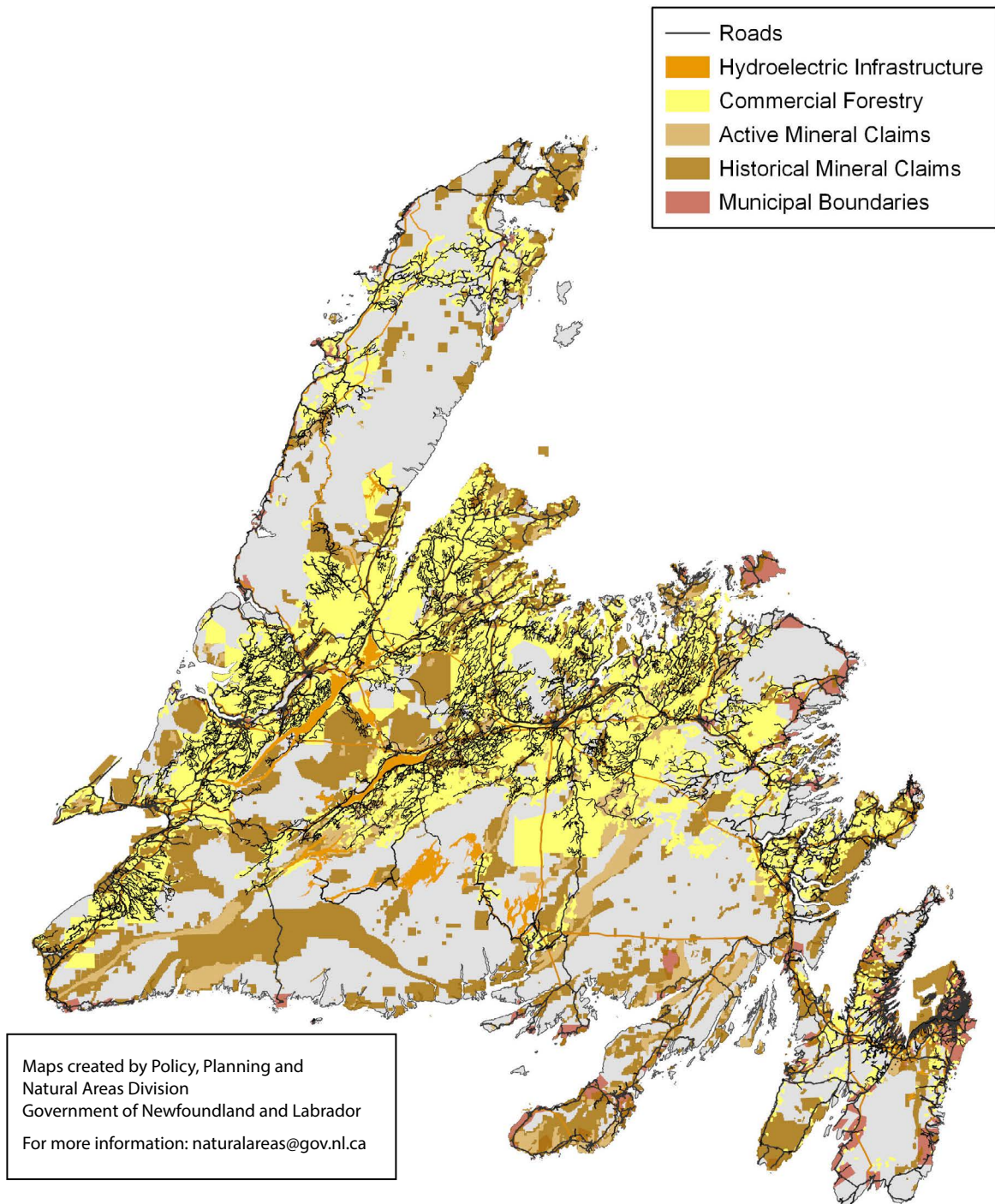


Figure Civ. Human Footprint Analysis/Development Considerations for the Island of Newfoundland, 2020 (with no buffer on development) including roads, municipal boundaries, hydroelectric infrastructure, commercial forestry, and all active and historical mining claims. Grey denotes land with negligible development or for where no data were available.

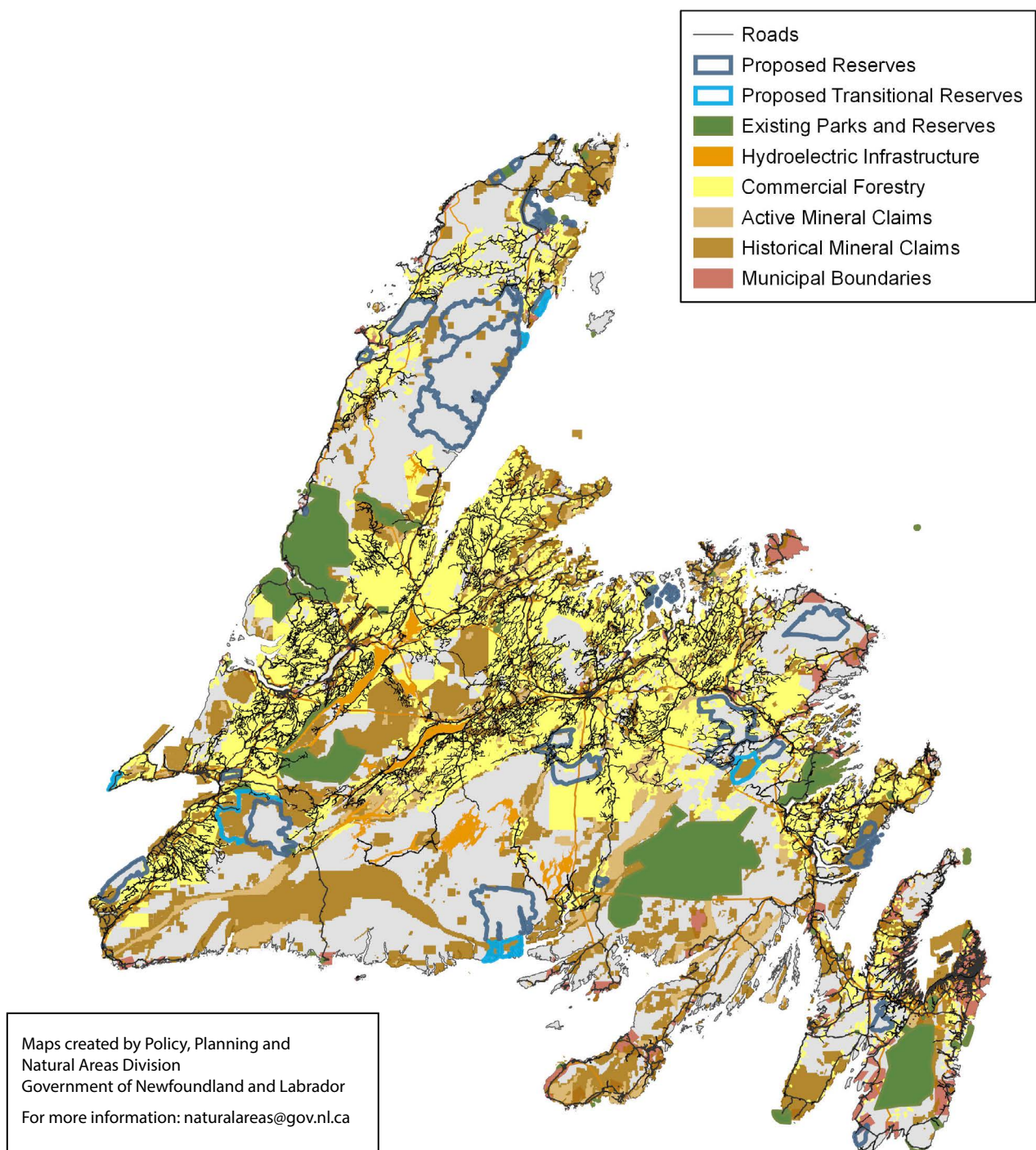


Figure Cv. Human Footprint Analysis/Development Considerations for the Island of Newfoundland (Overview 2), 2020 (with no buffer on development), including existing and proposed protected areas, and all land uses (active and historical mining claims, forestry, hydroelectric infrastructure, roads and municipal boundaries). Grey denotes land with negligible development or for where no data were available.

Appendix D. Common Misconceptions Arising from the Public Consultation

The Misconceptions	The Facts
This is WERAC's Plan, developed by WERAC.	This Plan was developed by the provincial government, with comprehensive engagement across departments.
WERAC is a lobby group or Environmental Organization.	WERAC is a volunteer advisory council with membership from around the province. The Council is appointed by government and advises government on establishment and management of wilderness and ecological reserves.
The 2020 public consultation was the only opportunity for the public to have their say on the Plan.	Every single reserve that is established is legally required to go through a local public consultation. The 2020 (Phase 1) consultation was in addition to this process.
The boundaries are finalized.	The proposed boundaries are not finalized. Different boundaries can be proposed during Phase 2 local public consultations on each reserve. WERAC then proposes boundaries to government and government makes the final decision on boundaries.
Traditional activities like hunting and fishing will be prohibited or restricted.	The WER Act allows for the continuation of traditional activities, depending on the activity and the reserve. Some reserves have fishing and hunting and snowmobiling (as well as other activities). However, how a reserve is managed depends on public consultations and the reason for which a reserve is being established. WERAC then proposes management to government and government makes the final decision on how a reserve will be managed.
The Plan doesn't take into consideration economic impacts.	The areas that were chosen are a result of internal government deliberations to ensure that areas of high priority for resource development were not proposed for protection, where alternative sites were possible.

The Misconceptions	The Facts
Once reserves are established, they will take away our rights.	Management (other than staffing changes) or boundaries can not be changed without first undertaking a local public consultation, and WERAC makes recommendations to government based on that consultation.
We have plenty of wilderness on the Island and little development. There's no need for protected areas.	Most of the Island has been impacted by development in some way. There is little intact wilderness left on the Island of Newfoundland. Most intact wilderness is open for industrial development.
Local stewardship or existing legislation (i.e. for hunting, ATViing or cabin development) is sufficient to protect land.	Species and habitats are declining across Canada, including the Island of Newfoundland. Specific protected area legislation is written to ensure protection of species and their habitats. Using legislation created for other reasons doesn't have the same effect. Local stewardship, while important, is not an effective way to protect land from industrial development long-term. This would mean relying on each development engaging local people in a public consultation process and a trust that their comments would influence the outcome.
We are doing well and have enough of the Island protected.	As of 2021, we only have 6.7% of the Island protected, and 6.8% of the province. This is lagging far behind most of Canada, and the world. The area currently protected is not enough to protect our landscapes, habitats and species from current and future threats.
Protected areas should be established where no one uses the land.	Protected areas can be compatible with low-impact uses of the land such as hunting and fishing. There are also not many wild spaces left on the Island that have not been impacted by development in some way, that are not prioritized for development, and where people do not go for recreational purposes, or to carry out traditional activities. Protected areas planning also needs to consider things like habitat for species-at-risk, and how well an area represents a natural region (area with unique climate, species and geography).



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*Wilderness and Ecological
Reserves Advisory Council*

