



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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Available in alternate format upon request.

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The maps in this document are for illustrative purposes only.

Front Cover: Burnt Cape Ecological Reserve; photo credit Government of Newfoundland and Labrador Back Cover: Arches Provincial Park; photo credit Government of Newfoundland and Labrador

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/ecc/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 <u>A Home for</u> 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 <u>A Home for Nature Story Map</u>. 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 <u>A Home for Nature: Protected Areas Plan for the Island of Newfoundland | EngageNL</u> and 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.

Aplanned 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

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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),

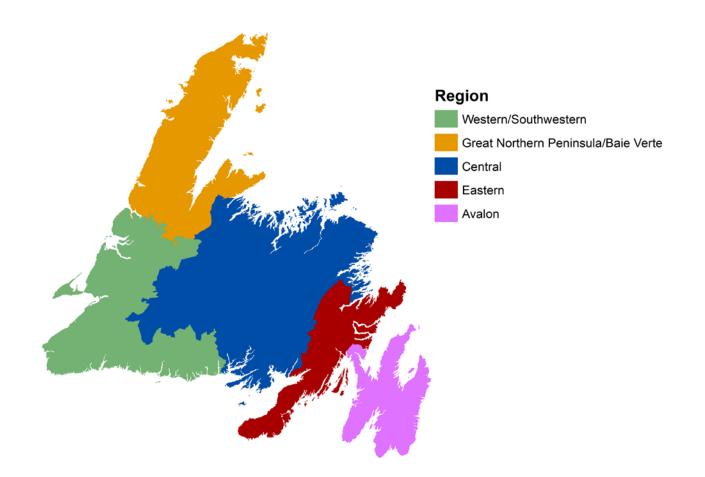


Figure 1. Island of Newfoundland divided into regions based on boundaries of combined postal codes (first 3 digits). This information was asked of respondents submitting data through the online questionnaire on the Protected Areas Plan for the Island of Newfoundland. Where respondents submitted comments 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.

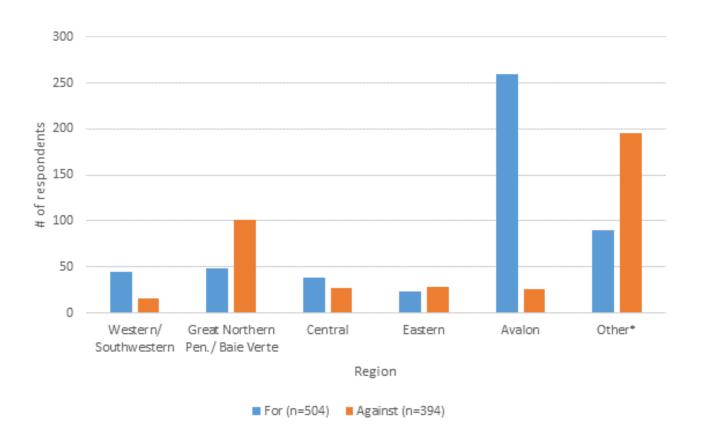
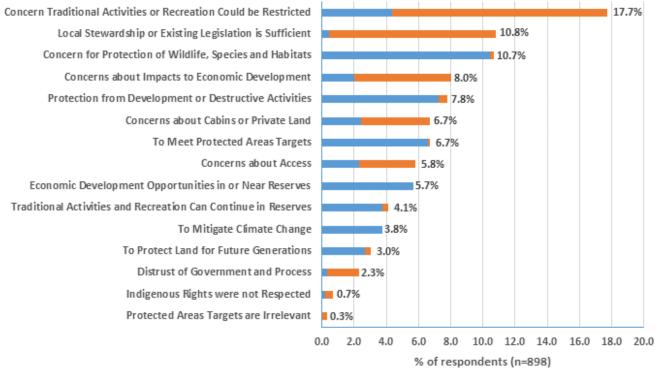


Figure 2. Level of regional support for the Protected Areas Plan for the Island of Newfoundland.

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

🔳 For Plan 📕 Against 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	 Concern that Traditional Activities or Recreation Could be Restricted To meet Protected Areas Targets/ Protection from Development or Destructive Activities
Great Northern Peninsula/ Baie Verte	 Concern that Traditional Activities or Recreation Could be Restricted Local Stewardship or Existing Legislation is Sufficient Concerns about Impacts to Economic Development
Central	 Concern that Traditional Activities or Recreation Could be Restricted Concerns about Cabins or Private Land/ Concern about Access
Eastern	 Concern that Traditional Activities or Recreation Could be Restricted Concerns about Cabins or Private Land Local Stewardship or Existing Legislation is Sufficient
Avalon	 Concern for Protection of Wildlife, Species and Habitats To meet Protected Areas Targets Protection from Development or Destructive Activities
Other*	 Concern that Traditional Activities or Recreation Could be Restricted Local Stewardship or Existing Legislation is Sufficient 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:

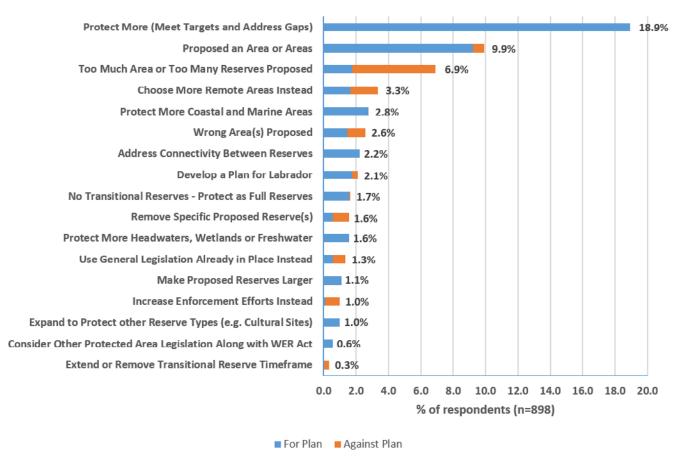
- 1. The Content of the Plan;
- 2. Reserve Management; and
- 3. The Consultation Process.

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-atrisk 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.



Public Feedback on the Content of the Plan

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	 Protect More Area (Meet Targets and Address Gaps) Proposed an Area or Areas Too Much Area or Too Many Reserves Proposed
Great Northern Peninsula/ Baie Verte	 Too Much Area or Too Many Reserves Proposed Protect More Area (Meet Targets and Address Gaps) Proposed an Area or Areas
Central	 1. 1Proposed an Area or Areas 2. Protect More Area (Meet Targets and Address Gaps) 3. Too Much Area or Too Many Reserves Proposed
Eastern	 Choose More Remote/Less Used Areas Remove Specific Proposed Reserve(s) Protect More Area (Meet Targets and Address Gaps)
Avalon	 Protect More Area (Meet Targets and Address Gaps) Proposed an Area or Areas Protect More Coastal and Marine Areas
Other*	 Too Much Area or Too Many Reserves Proposed Protect More Area (Meet Targets and Address Gaps) Proposed an Area or Areas

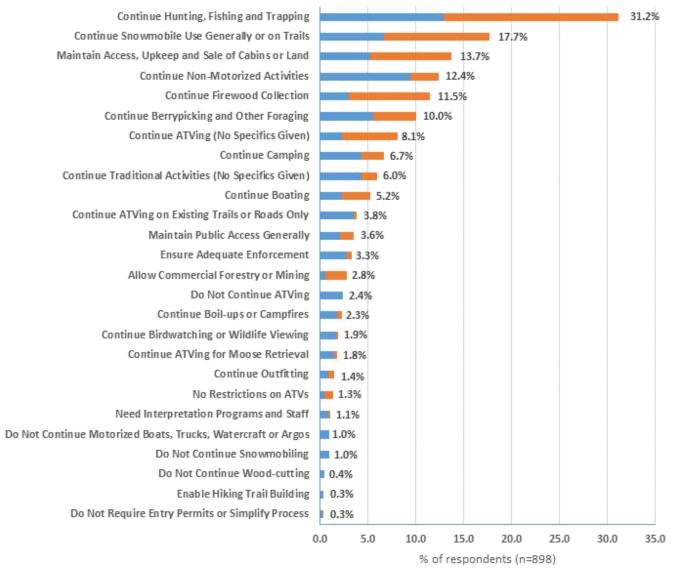
*'Other' includes those submissions from outside the Province or where location could not be determined.

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.



Public Feedback on Reserve Management

E For Plan E Against Plan

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 ATVing 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.

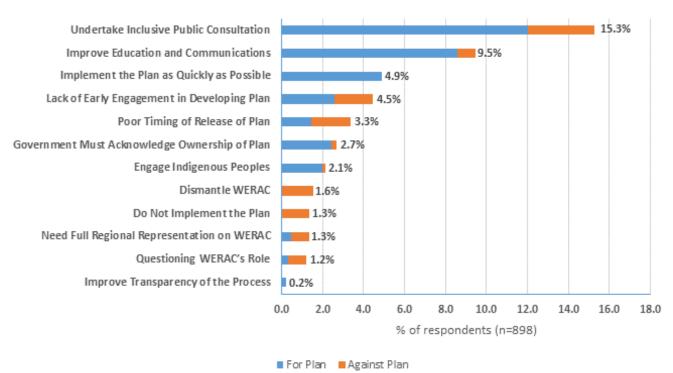
Table 6. By region, the top three recommendations for management of reserves proposed in the Protected Areas Plan for the Island of Newfoundland. (Phase I consultation on the Protected Areas Plan for the Island of Newfoundland)

Region	Comments
Western/Southwestern	 Continue Hunting, Fishing and Trapping Continue Snowmobile Use Generally or on Trails / Continue Non-Motorized Activities (biking, hiking etc.)/ Continue Berrypicking and Other Foraging
Great Northern Peninsula/ Baie Verte	 Continue Hunting, Fishing and Trapping Continue Snowmobile Use Generally or on Trails Continue Firewood Collection
Central	 Continue Hunting, Fishing and Trapping Continue Snowmobile Use Generally or on Trails Maintain Access, Upkeep and Sale of Cabins or Land
Eastern	 Continue Hunting, Fishing and Trapping Maintain Access, Upkeep and Sale of Cabins or Land Continue Snowmobile Use Generally or on Trails
Avalon	 Continue Hunting, Fishing and Trapping Continue Non-Motorized Activities (Biking, Hiking, etc.) Continue Snowmobile Use Generally or on Trails
Other*	 Continue Hunting, Fishing and Trapping Continue Snowmobile Use Generally or on Trails 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.



Public Feedback on the Consultation Process

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 easyto-read communications led to the spread of misinformation. People suggested ways of improving communications for Phase 2, and recommended that resources to 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 lead 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

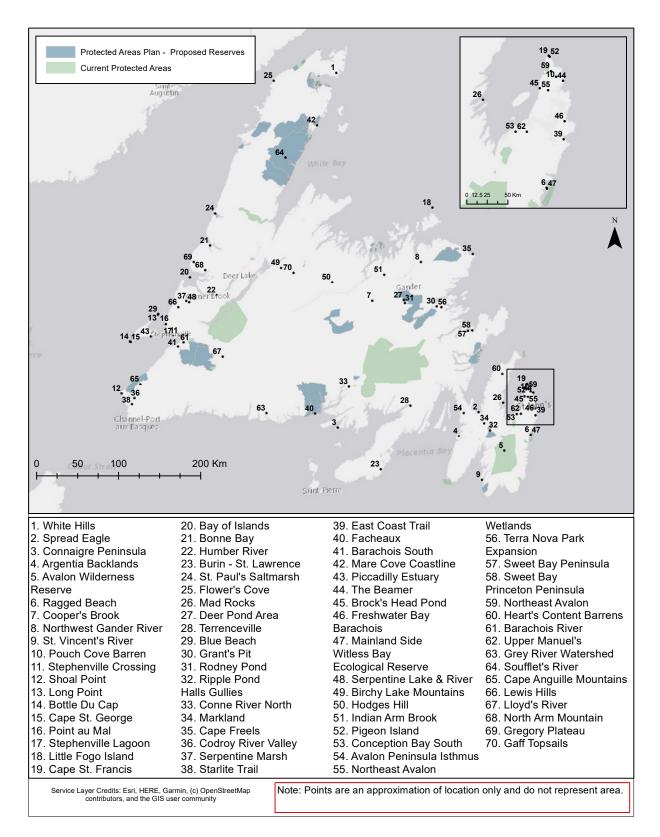


Table A. Natural areas proposed for protection by the public as additions to sites proposed in the Protected Areas Plan for the Island of Newfoundland, other than to protect wetlands and waterfowl. Submissions were received during the public consultation period in 2020.

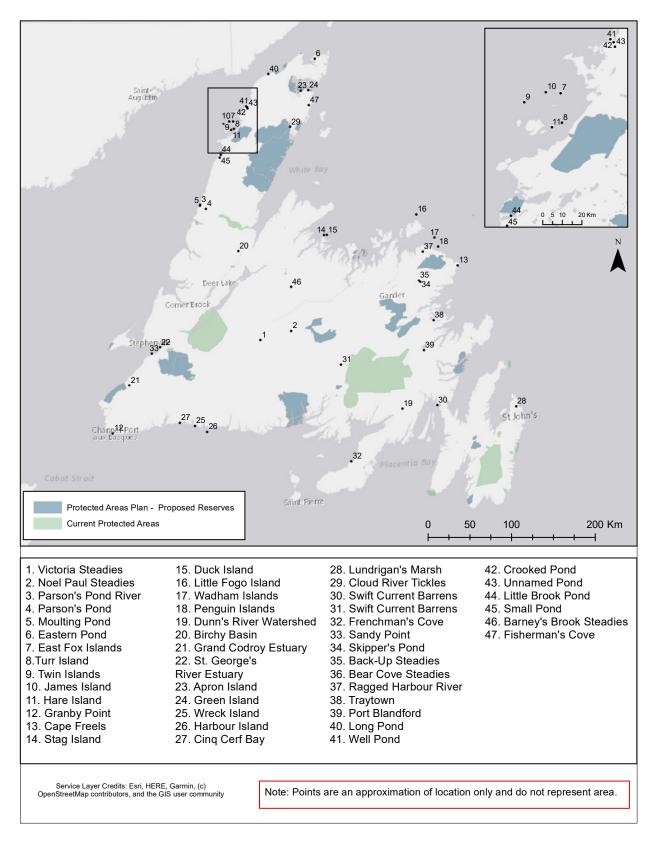
Map reference	Site name	Reason for protection
1	White Hills	natural area
2	Spread Eagle	natural area
3	Connaigre peninsula	scenic area
4	Argentia backlands	natural area
5	Avalon Wilderness Reserve	resource extraction buffer around reserve
6	Ragged Beach	proximity to seabird colony, coastline preservation, 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

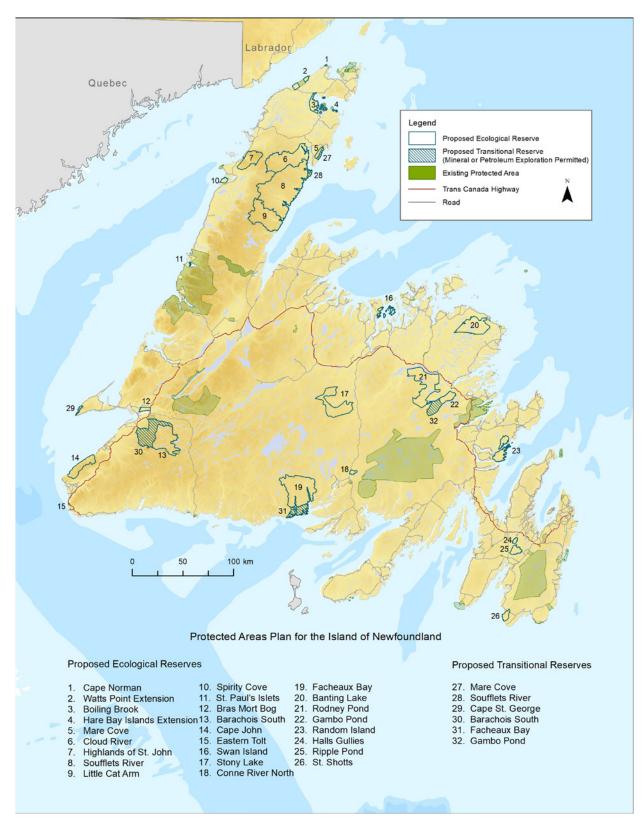
Appendix A2 (Map 2 of 2):

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



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

