

Link to Survey: <https://ns20by2030.ca/>

Question 1: What are the biggest opportunities for the Province in conserving more land and water? How can they be accomplished?

Protecting higher conservation value Crown land is the best way to meet the legislated goal of protecting 20% of our lands and waters by 2030.

There is more than enough crown land in Nova Scotia to do this. With 13% already protected and 1% in the works, we need to protect another 6% to meet the target. In terms of our landmass, this means protecting another 330,000 ha or about 18% of existing crown land.

The Protected Areas Branch of NS Environment and Climate Change already has a great deal of information about which areas of crown land should be prioritized for protection based on their ecological value. They must be given sufficient authority and resources to do their job and to do it quickly.

Question 2: What are the biggest challenges for the Province to achieve the 20% goal? How could they be overcome?

The lack of urgency shown to date in advancing protection is the biggest challenge. For example, this simple questionnaire seeking public input could and should have been issued as soon as the commitment to protect 20% by 2030 was put into law. That was in 2021. Making a plan to make a plan is not good enough two years on. Less than one additional percent of the province has been moved into protection since 2021. Meanwhile areas of crown land that are of significant conservation value have been degraded by forestry and other industrial activities. Worse yet, approvals continue to be issued for these activities. **While the government drags its feet, we are losing biodiversity. What will be left to protect if this goes on?**

A tiny proportion of forests in Nova Scotia -- less than 1% according to the Lahey Report -- can be considered old-growth, and by that we mean (roughly) forests over 125 years old. The forests we have now are a shadow of the magnificent forests that clothed this land before colonization. But they are what we have to work with, and they are vital for addressing the twin crises of climate change and biodiversity loss.

William Lahey wrote his Report on Forestry Practices in Nova Scotia before the full cost of nature loss was understood by most of us. Nonetheless, the report's fundamental recommendation addresses the core issue: it states that protecting and restoring ecosystem health must be our 'overarching priority.' Lahey is crystal clear that we can no longer balance economic interests against environmental ones. Ecosystem health must come first because everything else depends on it.

To restore healthy ecosystems we need to preserve what remains of our old forests on Crown land, say forests over 80 years old. **How else can we rebuild the stock of old-growth forest? Old and old-growth forests support more forms of life (biodiversity) and store more carbon than young forests. They are complex, resilient and fire-resistant.**

Unfortunately, the 'ecological forestry' many looked forward to as part of the implementation of Lahey's recommendations is proving to be only a very small step down the road to sustainable forestry practices on Crown land. According to DNRR's own Fieldcard guide to the harvest prescriptions in the Silvicultural Guide to the Ecological Matrix, almost all of them result in forest removals of 50%, once trees taken out to create extraction trails are counted. Forest ecologists concur that removals over 30-35% open up the forest canopy too much, damaging both biodiversity and carbon storage. So, sadly, 'ecological forestry' as currently practiced on Crown land continues to result in forest degradation of the sort implicated in steep declines of bird populations in the Maritimes between 1985 and 2020.

Please understand, we are not against all forestry. We know that it is essential to our rural communities. We believe that rigorous, sustainable, ecological forestry practices are the only means to a sustainable economy for forestry moving forward.

Replacing old forests with young ones has resulted in devastating declines in biodiversity. Old forests are sought after by the forestry industry because they contain a higher volume of wood than young forests. As a result, our remaining supply of intact older, ecologically valuable forests is constantly being reduced. These old forests, given the many impacts of climate change, are probably irreplaceable. They need to be protected now, not after they are gone.

One way to overcome this challenge is to put an immediate moratorium on logging, development and industrial activities in all forests over 80 years old on crown land until the goal of protecting 20% has been met.

Estimates vary as to how much old forest remains in Nova Scotia from well under 5% to approximately 20%. Given that 18% of crown land will need to be moved into protection by 2030 to meet the mandated target, providing interim protection to forests over 80 seems eminently practical. Failure to provide this interim protection will most likely result in a race by resource companies to extract as much as they can from areas likely to be off-limits by 2030. In other jurisdictions it is common to introduce a moratorium when a new conservation goal for an area is made public, precisely in order to avoid a race to grab resources before the area can be protected.

Question 3: How can the Province encourage private land owners to participate in meeting the provincial target of 20% protection?

While some private landowners will donate land for protection, most will need and want compensation. Money used to be set aside in the provincial budget to buy land of particular conservation value. This provision (removed by Stephen McNeil in 2016, I think) should be reinstated. The money should only be used for land with the highest conservation value, notably land that creates ecological continuity and offers wildlife connectivity between protected areas.

So little coastal land is in public hands that it may be necessary to buy shoreline and islands in order to protect rare coastal habitats.

It is important to ensure that private lands added to the 20% are permanently protected. Weaker forms of protection are not acceptable.

Question 4: What should government consider when identifying new provincial lands and water for protection?

The Protected Areas branch of ECC has a well-thought out list of conservation priorities that should form the basis for selecting what areas to protect.

In addition to using this list, opportunities for reconciliation with the Mi'kmaq should be given priority. Federal funding exists for Indigenous Protected and Conserved Areas (IPCA). In IPCAs, Indigenous Peoples' continued relationship with the land and water is assured by acknowledging the authority that Indigenous governments have to work with their people on how to use the land and water while achieving conservation and cultural objectives.

Areas identified as old-growth forest in NRR's Old-Growth Forest Policy layer should be given permanent protection by including them in the 20%.

Nova Scotia is fortunate to have citizens actively involved in identifying and protecting biodiversity. Many have submitted proposals to protect specific areas to the Protected Areas Branch of ECC. These proposals should be placed under consideration for protection right away. This would give the proposed Wilderness Areas interim protection.

Special attention should be given to protecting habitat for Species at Risk (SAR). Citizens continue to identify and report SAR occurrences on Crown land, frequently in areas already approved for logging. NS Natural Resources and Renewables (NRR) acknowledges their recurrent failure to identify SAR during the approval process. The Wildlife Division at NRR wants to move from a model where buffers are applied around individual occurrences of SAR to one in which such occurrences are understood to indicate habitat in need of protection. They should be given the resources to make this move and mandated to work with the Protected Areas Branch of ECC to meet Nova Scotia's legal obligation to protect endangered species.

The Mainland Moose Recovery Plan (2021) identifies core habitats essential to recovery of this species. To date none of these areas actually been designated for protection. This plan and recovery plans for other SAR offer further important guidelines for identifying areas in urgent need of protection.

Question 5: What would you like to see included in the Strategy?

Instead of nice-sounding words about collaborating we need specifics. Every year from now until 2030 we need to hear announcements of areas that are being protected.

The following areas in Western Nova Scotia have been proposed as Wilderness Areas by citizen groups and make good candidates.

In Annapolis County: Beals Brook; Big LaHave Lake; Goldsmith Lake; Little Bear Lake

In Kings: Chain Lake

In Lunenburg: Lake Minamkeak

In Halifax: Ingram River

In Digby: Rocky Point Lake (proposal in the works)

Other proposals have been submitted to ECC for Cape Breton and the rest of the mainland.

As an Annapolis County resident, I want to draw particular attention to two proposed Wilderness Areas in my county, Beals Brook and Goldsmith Lake. Proposals to protect both were submitted to ECC in 2022 but nothing has happened. DNRR approved logging plans for old forests in both areas and claimed there was no evidence of species at risk there. Citizen scientists subsequently identified numerous species at risk lichens in the harvest plan areas. These areas need protection and they need it soon. They are perfect examples of the need for a moratorium on logging, mining and development in forests over 80 years old on Crown land until 20% of our province is protected.

I would also like to see clarity in the strategy that any lands and waters included in the 20% will be permanently protected. The recent experiences Nova Scotians have had with government's willingness to accommodate private interests seeking to remove protection from areas understood to be protected (Owls Head) and actually protected (West Mabou Beach) have left us with a bad taste in our mouths. Governments of every stripe must rebuild trust by not allowing corporate interests to undermine public trust and the public good.

Question 6: Any other ideas for advancing Nova Scotia towards our protection and conservation goal?

Last December Canada – and 185 other countries – signed on to the Kunming-Montreal Global Biodiversity Framework. This includes a commitment to protecting 30% of lands and waters by 2030.

In the context of the global emergency that the Biodiversity Framework is intended to address, Nova Scotia's commitment to protecting 20% by 2030 is a moderate and reasonable step, one that recognizes that a smaller proportion of our land is in public hands than in most other provinces and territories. Any attempts to slow-walk progress on Nova Scotia's commitment must be resolutely opposed by this government and any other in power between now and 2030.

In the face of the climate and nature loss emergencies battering our province, our physical, social and economic health depends on protecting nature as well as slashing emissions and improving energy efficiency.

We are all stakeholders.

This means that the demands and preferences of the forest industry can no longer dominate other interests when it comes to management of our public lands. Changes to the Crown Land Act in 2021 clarified that forestry is now only one among multiple values shaping the use and treatment of Crown land. 'Stakeholder consultations' must reflect this change. Industry has a seat at the table but not at the head of the table. Not anymore. Not if we want a livable future.

Specifically, the historical dominance of the Department of Natural Resources over the Department of Environment must end. The Protected Areas branch of ECC must be provided with adequate resources to get on with protecting 20% of Nova Scotia's lands and waters according to their ecological value. In order to help them achieve this goal within the legislated time frame, the time and money-wasting provision in The Wilderness Areas Act requiring lengthy consultations on the social and economic impact of protecting every single wilderness area should be dropped.

Wilderness areas can and will meet multiple needs, from improving Nova Scotian's mental and physical health to protecting water quality to increasing eco-tourism. But they must, first and foremost, protect and restore ecosystem health. Every other benefit flows from meeting that goal.

We don't have time to mess around. I want this Strategy to embody the roll up your sleeves and get on with it energy that both the federal and provincial governments brought to tackling COVID. That means a moratorium on logging, development or industrial activities in all forests over 80 on Crown land until the 20% target is met.

It means interim protection for all areas already proposed for protection.

It means measurable progress each and every year in protecting our lands and waters. Adding 1% a year to protected areas between now and 2030 from our current starting point of 13-14% is the best way to ensure that the 20% goal is actually met within the legislated timeframe.