

A CRITIQUE OF THE PARKS CANADA MANAGEMENT PLANNING SYSTEM

by

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Introduction

Canadians have entrusted Parks Canada with the task of managing the system of national parks, national historic sites and historic canals on their behalf for well over 100 years. This trust is based on the implicit understanding that sound management will ensure that that these places will endure for the benefit of all Canadians. Management plans form the basis for that trust.

The *Parks Canada Agency Act* states that management plans will be prepared for national parks, and national historic sites under its jurisdiction. In 2013, the Agency issued a new directive on management planning and reporting and in 2014 produced guidelines for management planning and reporting. These documents now direct the production of management plans.

In January 2021, Parks Canada released the draft management plan for the Rideau Canal National Historic Site and World Heritage Site for public review and comment. This plan, at 10 pages in length, immediately invited comparisons with the 2005 plan at 88 pages. Reviewers of the draft plan, representing a wide range of knowledgeable individuals and stakeholder groups, quickly come to the conclusion that the draft plan is deficient in many respects, most notably, its failure to meet its mandated requirements, as required by the *Parks Canada Agency Act*, and its failure to ensure that the Outstanding Universal Values of the Site are protected and communicated, as required by the World Heritage Convention.

This critique will not address the deficiencies of the draft plan as that will be amply demonstrated in submissions by Mr. Ken Watson, the coalition of four lake associations, other heritage interests and myself. The overall conclusion of the review is that the draft management plan must be substantially modified to produce a management plan consistent with international standards and norms for protected heritage places.

This has led us to question how an internationally respected conservation organization could produce a management plan for a world heritage site that does not provide Canadians with a clear picture of how the site will be managed to preserve its national and international heritage values. In addition, and equally troubling, is the how the draft plan, both in content and format, and for that matter, management plans prepared since 2014, constitute an impediment to providing accountability to Canadians.

This critique is in three parts

- Part 1 is an evaluation of the *Directive for Management Planning and Reporting* and *Guidelines for Management Planning and Reporting*.
- Part 2 compares the Parks Canada management planning directive and guidelines, and resultant management plans, against similar directives and management plans for protected heritage areas elsewhere around the world and guidance from the World Heritage Centre and IUCN. This will determine if the Parks Canada management planning system provides adequate protection for protected heritage areas consistent with generally accepted norms and models for management plans. In addition, how does the Parks Canada planning system compare to others in terms of public input into the planning process and accountability to the public?
- Part 3 analyzes the degree of transparency, that being, the amount, type and level of detail of the management planning process and related documents available to the public. This is a matter of accountability and access to information so that the stakeholders can understand the process and feel that they can participate effectively.

It is fair to ask the question why this critique of the Parks Canada management planning system is in the broader public interest. The answer is quite simple. Parks Canada is the steward of our national parks, national historic sites and historic canals on behalf of all Canadians. Canadians have placed their faith in the Agency to ensure the commemorative and ecological integrity of these places so that they can be protected and enjoyed for future generations. The management plan applies the legislation and policies of the Agency to a specific site or park. Parks Canada has an obligation to provide Canadians with comprehensive management plans that provide clear direction to site managers to achieve the

Agency mandate. Equally important is a planning process that is open, transparent and inclusive.

About the author

I have been involved with the Rideau Canal in some form or another for the greater part of 47 years. My association commenced in 1974 when I was part of a federal- provincial historical research team to undertake an inventory of historic features of the Rideau Canal and Trent Severn Waterway. Thereafter, I was a member of another federal- provincial planning team tasked to provide policy alternatives to address the recommendations arising from the 1971 Canada Ontario Rideau Trent Severn (CORTS): Yesterday, Today, Tomorrow planning study. Subsequently, I provided input into the formulation of the CORTS Policies and then the Rideau Canal Policies.

In 1990, I commenced work on the first management plan for the Canal, approved in 1996, and the subsequent revision, approved in 2005. Throughout this time I served as planning advisor to the Superintendent, providing advice on a wide range of adjacent land use policy plans and development issues, and the world heritage site nomination documents. At the same time, I prepared management plans for a number of national historic sites, a large number of commemorative integrity statements for national historic sites not owned by Parks Canada, and participated in the National Cost Share Program for National Historic Sites not managed by Parks Canada.

Upon my retirement in 2008, after 34 years with Parks Canada, I undertook the conservation of a 1924 cottage and ancillary buildings on the Rideau Canal for which my wife and I received an award from the Architectural Conservancy of Ontario. During the last 10 years, I was a Board member of the Rideau Roundtable, an environmental advocacy organization. Recently, I became a Board member of the Dog and Cranberry Lakes Association, a lake residents association for these two lakes on the Rideau Canal.

As a result of my long association with the Rideau Canal, I have become very familiar with the heritage values of the Canal corridor, the issues affecting these values and the benefits of a comprehensive management plan.

PART 1

Evaluation of the *Directive for Management Planning and Reporting* and *Guidelines for Management Planning and Reporting*

The critique commences with a review of *the Directive for Management Planning and reporting (2013)* and the *Guidelines for Management Planning and Reporting (2014)*. The critique will largely focus on the latter. It is not intended to be a comprehensive in depth analysis of every aspect of the guidelines, but rather will highlight some critical shortcomings apparent to the author. These issues will provide a framework when comparing the Parks Canada model to those in use elsewhere in the world in part 2. Excerpts from the *Directive* and *Guidelines* are provided at the beginning of each section.

1. Policy Framework for decision making

What is a Management Plan and When is it Appropriate?

A management plan is a public document, prepared in consultation with Aboriginal peoples and Canadians, that articulates a long-term vision for a heritage place as well as management direction (in the form of key strategies and measurable objectives) that will guide strategic decisions about the heritage place over a period of 10 years (from: Guidelines...)

It is quite clear that Parks Canada regards management plans as action oriented documents intended to achieve results. While this is appropriate, the lack of any policy framework or management objectives to guide the overall management of the site is a serious shortcoming. What appears to have been forgotten is that these documents should also include a policy framework to direct the ongoing management of a national park, national historic or historic canal to achieve the mandate as stated in legislation. In the past, managers used the management plans to guide decision making, the formulation of work plans and when dealing with stakeholders, other levels of government and the general public. The *Guidelines* make it quite clear that management direction consists only of key strategies and objectives rather than its primary role as a decision making tool.

The management of a protected heritage area is a lot more than carrying out projects and actions to achieve desired results. It involves a wide range of decisions and responses to external pressures and influences, challenges and opportunities which require a policy framework specific to the peculiar characteristics of that site. While the *Parks Canada Agency Act* and the *Parks Canada Guiding Principles and Operational Policies* provide an overall legislative and policy framework for the Agency, these are not adequate as a policy decision making framework for a particular site on a day to day basis.

The draft Rideau Canal management plan is a case in point. As an example, there are no policy statements addressing the land use planning and the development of lands adjacent to the Rideau Canal. This is a critical matter as this affects the visual values of the Canal, a UNESCO requirement, the ecological integrity of the Canal, a legislative requirement, and the heritage character of the Canal, a policy requirement. The Rideau Canal is not unique in this matter. Every national park, national historic site and historic canal has to deal with adjacent land use issues which require a policy framework.

For historic Canals, the only policy direction from the *Guiding Principles and Operational Policies* for this matter is as follows:

2.1.5

Parks Canada will encourage local governments and other agencies to contribute, by means of plans, zoning bylaws and public education, to the protection of the heritage character of corridors formed by the canals and adjacent lands.

There are similar policies for lands adjacent to national parks and national historic sites.

The 2005 Management Plan expanded upon this policy direction with detailed policy statements, in the form of actions, on Parks Canada's involvement in planning and development matters (6.0 Waterfront Land Use and Development). As a result, Indigenous people, municipalities, other government bodies, stakeholders and the general public had a clear understanding of Parks Canada's legitimate interests in adjacent land use policies and development. The current draft management plan in contrast has no Parks Canada position on the management and development of the 1500 + km of lands adjacent to the Rideau Canal. This lack of a clear policy statement on a crucial aspect of canal management is unacceptable. The same holds true for other mandated areas those being commemorative integrity, ecological integrity and heritage presentation.

This is also a matter of responsible management, accountability and transparency. The public has a right to know the policies directing the management of a protected heritage area, and the actions to be undertaken to achieve ecological and commemorative integrity. All Canadians and especially stakeholders, potential partners and other government agencies need to know this as well.

Parks Canada management plans now only identify what will be accomplished and even then in terms of “targets” rather than actions. The *Directive* and *Guidelines* have resulted in management plans that are really nothing more than “high level” work plans.

The complete lack of a policy framework for the actual management of a protected heritage area does not serve managers, and is not in the public interest as it severely reduces accountability and transparency.

2. Streamlining and Efficiency

The following is an excerpt from the *Guidelines*:

The Guidelines for Management Planning and Reporting provide guidance on how to fulfill the requirements for management planning found in the Directive on Management Planning and Reporting. These Guidelines aim to:

- *streamline products and processes;*
- *better inform decision-making by clearly setting measurable expected results;*
- *ensure contribution to various Agency needs at all levels;*
- *provide integrated delivery of the mandate; and*
- *make efficient use of Agency time and resources.*

The first and last aims are troubling and are related. The extremely prescriptive nature of the *Guidelines* has gone so far as to prescribe the length of each section of the plan for parks and historic sites with no regard for their complexity and size. For example, the Rideau Canal and Bellevue House are both limited to a maximum of about 10 pages as they likely don't have to address management areas and zoning. The current draft management plan for the Rideau Canal is 12 pages in length. The approved management plan for Fort Wellington in Prescott is 9 pages excluding the maps. This is a tiny site with no complex issues.

The *Guidelines* provide the following description of the contents of a management plan:

A management plan prepared for heritage places on Lists 1A and 1B (Appendix 2, Directive) must include the following elements:

- *Executive Summary (1 page): Summarizes the management plan, highlighting management priorities and desired result*
- *Introduction (1 page): Provides an overview of the heritage place in the Parks Canada system, the role and mandate of Parks Canada and the purpose of the management plan. Standard text, found in the templates for management plans, should be used in this section.*
- *Significance (½ page): Describes the significance of the heritage place, the reasons for establishment or designation and any other values.*
- *Planning Context (1-1½ pages): Outlines the circumstances particular to the heritage place with implications for planning and management, including trends and key issues the plan is responding to, current management arrangements and relationships.*
- *Vision (½ page): Clearly outlines the desired future state of the heritage place in 15-20 years; should take a narrative form rather than bullet points.*
- *Key Strategies (2-5 pages): Consists of key strategies and associated short-term and long-term objectives with targets.*
- *Management Areas (optional) (1-2 pages): Describes specific geographic areas that warrant distinct management direction; should include specific objectives and targets for each area.*
- *Zoning (required for national parks, national marine conservation areas) (Maps not included in page count; if choose to include narrative, limit to 1 page): Consists of a simplified zoning plan; may refer to a more detailed zoning plan elsewhere.*
- *Strategic Environmental Assessment (1 page): Summarizes the assessment or, if short, provides the full assessment.*

While a 9 page management plan for Fort Wellington may be sufficient, a 10 page plan for the Rideau Canal is definitely not. A rigid limit on the number of pages does a great disservice to the public as it prevents a full description of the site or park, its values, the context, management issues and opportunities, stakeholder interests, and does not include a policy framework, as mentioned earlier. A streamlined product implies that extraneous material is eliminated in the interest of brevity. In this case, a streamlined product results in less contextual material, less understanding of the values of the place, less accountability, less transparency, and no policy framework whatsoever.

A streamlined process appears also appears to imply that activities that in the past took more time have been eliminated. Two processes that took time in the past: policy formulation and stakeholder involvement have been severely curtailed or

virtually eliminated. From personal experience, the first management plan for the Rideau Canal took a considerable amount of time owing to the need to craft a shared vision with stakeholders and other government bodies, formulate policies and involve stakeholders throughout the entire process. At the same time, planners were assigned parks and sites to provide ongoing advice and guidance on a wide variety of subjects, thereby gaining a broad and deep understanding of the management issues, and were often instrumental in establishing productive relations with stakeholders and other levels of government. This resulted in management plans that met the needs of the site or park and enjoyed widespread public support. As for the time it took to produce a plan, the amount of time to obtain National Office and Ministerial approval often exceed the time required to produce the plan.

Finally, the Guidelines *aim to make efficient use of Agency time and resources*. This admission is telling. It admits that the Agency intends to make the production of management plans as efficient as possible with the least amount of effort and staff resources. This is borne out by the guidelines, the scope of the plans, the bare minimum of stakeholder involvement and most obviously, their brevity. Planners are no longer assigned to a few sites in their region but prepare plans for sites or parks with which they have little knowledge. They have become mere scribes to ensure that the guidelines are followed and have little or no input into the content.

3. “State of” Assessment

The “State of” assessment is an internal assessment of the current state of the heritage place that identifies management issues arising from the condition of the heritage place, and is prepared every 10 years.

The Field Unit Superintendent must prepare a “State of” assessment (deck) for the review and approval of the Chief Executive Officer. There is no requirement to publish or distribute this assessment externally. However, the Field Unit Superintendent may share the results of the “State of” assessment with Aboriginal peoples and Canadians at his/her discretion.

Are there new interests or assertions from stakeholders or interested parties since the last management plan was prepared?

As made clear in the *Guidelines* the “state of” assessment is an internal process with no public involvement. This is unfortunate as the preparation of a state of assessment presents an excellent opportunity for relationship building, accountability and transparency. Inviting stakeholders to participate in this process sends a strong message that stakeholders have a right to know about the state of the site/park. While stakeholders may not be experts in determining the state of cultural or ecological resources, they may have surprising insights and penetrating questions that would contribute to a more rigorous evaluation. In addition, it is a valuable learning and relationship building opportunity for both parties.

As stated in the *Guidelines* (excerpted above), the assessment is required to document *new interests or assertions from stakeholders*. It is an opportunity to raise awareness about the issues to be addressed in the scoping exercise. Most importantly it can lay to a foundation for a climate of mutual trust, respect and understanding that can see the planning process through to a successful conclusion for all parties.

Regrettably, the direction to produce an internal assessment without stakeholder involvement, or even the opportunity to review or comment ensures that the planning process starts off on the wrong foot. What better time to hear from stakeholders and other interested parties about their interests and assertions than at this stage. Furthermore, making the results of a “state of” assessment public at the discretion of management may reinforce suspicions that Parks Canada is hiding a negative assessment that may not be addressed in the scoping document and management plan. This is no way to build trust and respect and encourage participation in the planning process

3. Scoping

From the *Guidelines*:

Typically an internal exercise, scoping may include discussions of sensitive matters. However, Aboriginal peoples, third-party heritage place managers, cooperative management boards, advisory boards or key stakeholders may be involved in preparing the scoping submission when their involvement is required under the terms of an agreement.

Inclusiveness: Management planning and reporting considers all of Parks Canada's mandate areas and the legislation that frames the Agency's work. Management planning and reporting respects a diversity of perspectives and engages Aboriginal peoples and Canadians in the management of heritage places in a fair and open manner.

Here again the scoping phase of a management plan review would appear to be an excellent opportunity to involve stakeholders and others in the planning process and build trust and respect. No doubt there will be sensitive matters that cannot be discussed but these will likely be few and far between. The policy that scoping is typically an internal exercise and restricts involvement to only those parties with an agreement practically eliminates most stakeholders from participating in this crucial stage of the planning process. It does not respect a diversity of perspectives or engage stakeholders in a fair and open manner.

Since the Scoping phase sets out the parameters for the planning program, the stakeholder and other interests can bring a diversity of perspectives to bear upon the preparation of a draft plan. By participating in this phase, stakeholders will feel valued and thereby more committed to supporting policies, strategies and actions in the plan. This is far more desirable than reacting to a draft plan latter.

Furthermore, without the involvement of stakeholders at the state of assessment phase and scoping, park managers can only form an educated guess about stakeholder interests. Often these are not all that apparent and only come to light during structured focussed discussions. The policy of excluding stakeholders and other interested parties from the state of assessment and the scoping phase is most egregious. It completely undermines Parks Canada's lofty principles of accountability and inclusiveness and sets up a potential confrontational situation upon the release of the draft plan.

There is a serious disconnect between the *Guidelines* and the actual application. The Guidelines make it clear that only those parties whose involvement is required under the terms of agreement may be involved in the scoping submission. In contrast, the general public were invited to provide input into the scoping phase, for many national parks in recent years. These "What we heard" summaries, revealed that extensive public consultations took place prior to the draft plan. Since the practice of consulting with the public at the scoping phase now appears to be standard practice, why not amend the Guidelines to require

stakeholder consultations at their request rather than a unilateral decision by site management.

4. Vision

The vision statement is a critical component of the management plan, answering the question, “What do we want this place to be in 15-20 years?” Serving as the broadest expression of the intended results for a heritage place, the vision should be an inspiring and evocative yet achievable description of the desired future state of the place, highlighting its special character and presenting in a balanced fashion all mandate elements: heritage protection, public appreciation and understanding and visitor experience.

The vision should be developed with input from Aboriginal peoples and Canadians. Provisions in establishment agreements, land transfer agreements and impact and benefit agreements may contain elements to consider when crafting the vision statement for a heritage place.

To gain widespread acceptance, the vision for a protected heritage area must be developed by all those who have a stake in its future. The development of a vision for the Rideau Canal is a case in point. The vision statement in the 1996 management plan was the result of a lengthy and intense period of consultation with a wide range of stakeholders. This vision remained essentially unchanged in the 2005 plan.

In contrast, while the *Guidelines* specifically state that the vision should be developed with input from Aboriginal peoples and Canadians, there is no stage in the planning process for that to occur. The scoping stage is usually an internal exercise as is the preparation of the draft plan. As a result, Aboriginal peoples and Canadians are presented with a vision that is solely directed to providing management direction for the key strategies as articulated in the following statement:

Key strategies articulate how managers intend to achieve the long-term vision for the heritage place and answer the question, “What integrated approaches will we take to realize the vision for the heritage place, in light of the management issues we have identified?”

There is no acknowledgment of a shared vision. The phrase *in light of the management issues we have identified*, clearly indicates that the focus is on Parks Canada’s agenda and no one else. This reinforces the widely shared perception that Parks Canada has devolved, at least on the Rideau Canal, into a bureaucratic

and inward focussed entity. A comparison of the vision in the 2005 plan to that of the current draft plan's certainly bears that out.

5. Guiding Principles

Parks Canada has had a set of Guiding Principles for many years now. These are the foundation for the management of the Parks Canada program. These are very sound and comprehensive and should provide direction for the preparation of management plans and the management of a protected heritage area. If these principles are so important, then why are they not referenced in the *Guide to Management Planning* as a checklist to ensure that management plans adhere to these guiding principles? There is no requirement in the *Guidelines* that management plans be consistent with the Guiding Principles. The only reference to the Guiding Principles is in the *Directive* which identifies them as "Related Authorities."

Guiding Principles, specific to a protected heritage area, are a good way to focus attention on what is really important for its management. These principles are core values that form the framework for the behaviour of the organization and decision making. They send a clear message to the public about what is important to the organization. The preamble to the guiding principles in the 2005 *Rideau Canal Management Plan* succinctly states the role of Guiding Principles in a management plan:

"These guiding principles provide a framework for public and private decision-making activities. It is vital that these principles be understood, accepted and applied to guide all private and public activities if the vision for the Rideau Canal corridor is to be achieved. "

This could be applied to any national park or national historic site. The question then still remains: why are there no guiding principles in Parks Canada management plans?

6. Stakeholder/Public Engagement

From the *Directive*:

7.6.2 Consulting with Canadians

Consultation with Canadians is a legal and policy requirement that must be undertaken as part of the preparation of a management plan to seek input from individual Canadians and Canadian organizations on the proposed management direction for a heritage place.

Field Unit Superintendents will undertake consultation with Canadians during the preparation of a management plan,

From the *Guidelines*:

In meeting legislative requirements for management planning consultation (described in the Directive on Management Planning and Reporting), Parks Canada Guiding Principles and Operational Policies outlines fundamental practices for consultation and public participation (p. 18-19):

- *that information be clear, timely, relevant, objective and accurate;*
- *that adequate notice and time be given for consultation;*
- *that input be carefully considered;*
- *that feedback be provided both on input received and on Parks Canada's response; and*
- *that there be respect for all interested publics.*

The policy direction for public engagement in management planning appears to be clear. However, there is one major issue, that being Parks Canada's feedback and response to input. This can take many forms from a brief summary of comments to detailed responses to substantive observations and comments. There needs to more clarity on how comments will be analyzed and how they will be reflected (or not) in the final management plan. This is fundamental to transparency and accountability.

Finally, the actual opportunities for input into the formulation of the plan are usually restricted to public review of the draft plan. As stated earlier, there is no requirement to consult with the public during the scoping stage, a critical point in the planning process. Stakeholders and other interests can then only react to the draft plan. This leaves them at a distinct disadvantage as they will not fully understand the context and possible alternatives that were considered in the formulation of the plan. How can this be an open and inclusive process?

The scope and scale of consultation with Canadians will be determined by the Field Unit Superintendent and is approved by the Chief Executive Officer during the scoping exercise.

While the onus is on Parks Canada to ultimately determine the nature of the public consultation program, consultation with stakeholders and others during the scoping stage to solicit their views on how they would like to be involved would result in a more inclusive and productive relationship and, finally, a better plan with full public support.

7. Conclusion

This evaluation of the Parks Canada management planning process has identified serious shortcomings which call into question the ability of the resulting plans to achieve the agency mandate and accountability to Canadians. Management Plans are the only means through which the public can be assured that the national parks, national historic sites and historic canals are being managed to achieve ecological and commemorative integrity, and that their values are being communicated to Canadians. The current planning guidelines may suit the needs of the Parks Canada Agency to produce a large number of plans with the least amount of effort and cost. In the end, the management plans are really nothing more than a work plan wrapped up in bureaucratic language, as in the case of the draft Rideau Canal Management Plan. However, as a statement of public policy, tabled in Parliament and approved by the Minister of the Environment, these plans do not meet the standard for the management of our nation's heritage which Canadians have entrusted to Parks Canada.

PART 2

A comparative analysis of the Parks Canada planning model to international norms and requirements for management plans for protected heritage places.

The second part of this critique will demonstrate that Parks Canada's planning model does not correspond with generally accepted international norms and standards for protected heritage area management plans. The author came to this conclusion by an examination of plans from a wide variety of jurisdictions in the English speaking world. These include Australia, New Zealand, the United States, British Columbia, Alberta, Ontario and the IUCN and World Heritage Committee guidance and requirements for world heritage site management plans. In addition, management plans for two world heritage sites in Great Britain were reviewed.

This sampling allowed for a comparative analysis of examples of excellent management plans, generally accepted planning processes and related guidance documents from a wide range of jurisdictions. From this sample, it was quite evident that there is a degree of conformity amongst them, and that the Parks Canada model is deficient, as will be illustrated below.

1.0 Purpose of a management plan

This statement, both in content and form of presentation, is the primary pronouncement of public policy for a park management authority. For it to have the desired effect, it must be absolutely clear so that the reader knows what to expect in the rest of the document and that it will achieve the mandate as required in legislation.

Here are a few purpose statements and general guidance for a park purpose statement.

1.1 Pontcysyllte Aqueduct and Canal World Heritage Site, Wales

Purpose and Structure of the Management Plan

1.4 The Management Plan provides the framework by which the Outstanding Universal Value of a World Heritage Site will be maintained, sustained and communicated.

1.2 Port Arthur World Heritage Site, Tasmania

The purpose of this management plan is to provide a framework for the effective use, development and management of the Port Arthur Historic Sites, particularly in relation to their heritage values. ‘An overarching policy document...for effective conservation, tourism operations and visitor management.’ This management plan acts as an overarching policy document under which operate a number of secondary and tertiary plans, and various management documents and policy guidelines.

1.3 British Columbia Parks Management Planning Process

What is a Management Plan?

A management plan is a document that outlines the vision and direction for a protected area. A management plan:

- *Situates the protected area within a landscape context, both geographically and as a part of the protected areas network, in short, where is it, and what is its role in BC Parks system.*
- *Describes the key features and values of the protected area (such as natural, cultural and recreation values).*
- *Identifies future appropriate management activities.*
- *Determines the appropriate levels of use and development.*
- *Establishes the long-term vision and management objectives to be met.*
- *Responds to current and predicted future threats to the values and opportunities to enhance or change the values and uses of the area.*

1.4 Castle Provincial Park and Castle Wildland Provincial Park, Alberta

This document outlines the unique considerations relevant to managing Castle Provincial Park and Castle Wildland Provincial Park within the context of the system of Alberta’s Provincial Parks. In the plan, each issue is given context, management objectives are identified and corresponding strategies are provided. The management plan is designed to provide a long term and comprehensive framework to guide both park operations and park developments. It has been produced in consultation with Albertans, stakeholders and First Nations, and is intended to help achieve sustainable protection of the valuable natural and cultural resources, and to provide the foundation for long-term economic benefits to the people of Alberta.

1.5 Ontario's Protected Areas Planning Manual

Management plan:

A document that provides a policy and resource management framework (management direction) for moderately and very complex planning projects and applies to one or more provincial parks or conservation reserves or for a combination of them.

1.6 Paparoa National Park, New Zealand

This Paparoa National Park Management Plan is the commitment of the Department of Conservation and West Coast Tai Poutini Conservation Board, working in partnership with Te Rūnanga o Ngāi Tahu and Te Rūnanga o Ngāti Waewae, to the community, business and others to secure the fullest proper use and enjoyment of the national park consistent with the preservation of its natural, cultural and historic features and the protection and wellbeing of its indigenous plants and animals. This Plan provides both day-to-day and long-term direction to managers and other departmental staff in the management of the Park and guidance to the public.

The Plan is the primary document for making decisions in relation to Paparoa National Park. The Plan has six main uses:

- for managing and protecting the flora, fauna, natural and cultural features of Paparoa National Park;*
- as an information source, setting out the commitment for managing Paparoa National Park;*
- as direction and guidance for managers of Paparoa National Park in their work;*
- as direction and guidance to decision-makers considering proposals from businesses and others who require authorisation to undertake activities within Paparoa National Park;*
- for monitoring the performance of the Department in implementing the Plan.*

1.7 National Parks and Wildlife Service, South Australia

Each park has a park management plan, these are strategic documents that set a long-term vision for that park. Management plans contain concise background information about the park and outline the objectives and strategies developed to meet that vision.

1.8 Operational Guidelines for the Implementation of the World Heritage Convention, Appendix A1

The principal objective of the management planning process is the strategic long-term protection of cultural heritage sites.

A range of management policies and/or objectives to achieve the vision, over a period of usually about five years;

Essentially, a management plan is the guidance document developed within, and describing, a particular management system. It is an important tool for all phases of the management cycle (planning, implementation, monitoring) at a cultural heritage property and needs to be periodically reviewed and renewed.

The plan should also reflect:

- Participation by key stakeholders and the wider community from the time of the preparation of the nomination, a shared understanding of the concept of World Heritage and of the implications of listing for property management;*
- A shared understanding of the current management system (the legal and regulatory framework, management structures and approaches), development plans and policies, as well as land uses which currently exist at the property;*
- A shared understanding among stakeholders of the OUV of the heritage property, the conditions of authenticity and integrity, and the factors affecting the property;*
- Shared responsibility and support among all stakeholders for the management approaches and actions required to maintain the property's OUV;*
- An inclusive approach to planning, sharing the task between all relevant authorities and stakeholders to draw up a feasible framework for decision-making that will ensure the sustainable management of the property into the future*

1.9 United States Parks Service Management Policies 2006

General Management Plan --This is a broad umbrella document that sets the long-term goals for the park based on the foundation statement. The general management plan (1) clearly defines the desired natural and cultural resource conditions to be achieved and maintained over time; (2) clearly defines the necessary conditions for visitors to understand, enjoy, and appreciate the park's significant resources, and (3) identifies the kinds and levels of management activities, visitor use, and development that are appropriate for maintaining the desired conditions; and (4) identifies indicators and standards for maintaining the desired conditions.

1.10 Alberta Parks Management Planning Process

What is a Management Plan? A management plan is a detailed plan for a specific park site or grouping of parks managed as a single unit, that provides day -to-day and operational guidance for park management for a ten year period.

A management plan:

- *Defines how a site will be managed to maintain ecological health and protect key natural and cultural values;*
- *Describes the type and extent of outdoor, nature-based recreation and tourism opportunities, facilities and services that will be permitted;*
- *Describes the services and facilities that will be provided to enable visitors to explore and learn about a site's natural and cultural values;*
- *Identifies issues, concerns and conflicts, and recommends solutions;*
- *Identifies upgrading and development requirements that will enhance outdoor, nature-based recreation opportunities and ensure that recreational use occurs in appropriate locations and in environmentally acceptable ways;*
- *Identifies boundary amendments, consolidations and reclassifications if required; and,*
- *Recommends effective and efficient allocation and prioritization of fiscal and staff resources.*

1.10 Parks Canada Directive on Management Planning and Reporting

A management plan identifies the long-term strategic direction for a heritage place and how it will be managed, consistent with Parks Canada's mandate and vision. Long-term strategic direction and objectives identified in management plans guide actions at heritage places that contribute to reaching the Agency's Strategic Outcome and priorities. A management plan ensures integrated delivery of Parks Canada's mandate: protecting heritage resources, promoting public understanding and appreciation and facilitating visitor experiences.

1.11 Guidelines for Management Planning and Reporting (Parks Canada)

What is a Management Plan and When is it Appropriate?

A management plan is a public document, prepared in consultation with Aboriginal peoples and Canadians, that articulates a long-term vision for a heritage place as well as management direction (in the form of key strategies and measurable objectives) that will guide strategic decisions about the heritage place over a period of 10 years

1.12 Draft Rideau Canal Management Plan 2020

The Rideau Canal and Merrickville Blockhouse National Historic Sites of Canada Management Plan, once approved by the Minister responsible for Parks Canada and tabled in Parliament, ensures Parks Canada's accountability to Canadians, outlining how historic site management will achieve measurable results in support of the Agency's mandate.

1.13 Analysis

In describing the purpose of a plan the Directive, the Guidelines and the draft Rideau Canal Management Plan make it clear that management direction is focused on achieving measurable results. The Directive uses the phrase "*how it will be managed*", and the *Guidelines* define management direction as *Key Strategies and measurable objectives*.

Every international example specifically state that the primary purpose of the management plan is to serve as a framework for decision making and management of the protected heritage area. Parks Canada regards management plans as a means to undertake actions or targets to achieve the Agency's strategic outcome. This is a normal part of most but not all management plans. Unlike other management plans elsewhere, the Parks Canada version does not contain policy direction or management objectives for the myriad of day to day issues facing a Park manager. The manager must therefore resort to Agency wide policy direction. This matter was addressed in part 1 of this submission.

Parks Canada does not regard these plans as performing an ongoing management function. They, therefore, cannot be referred to as a management plan.

The description of the purpose of the Rideau Canal Management Plan is an excerpt from a boiler plate introduction used for all Parks Canada modified for that plan. Compared to the clear purpose statements found elsewhere, it is focussed only on results.

2.0 Policy Framework

Section 2 of part 1, addressed the lack of a policy framework in some detail so there is no need to add to belabour the point. However, it is instructive to present a few examples from other jurisdictions.

2.1 Operational Guidelines for the Implementation of the World Heritage Convention, Appendix A1

A range of management policies and/or objectives to achieve the vision, over a period of usually about five years;

Provide a framework to make informed decisions and to manage change.

2.2 IUCN Guidance for Management Plans

A clear framework of approved policy.

It is important that management planning be carried out within a framework of approved policies within the protected area agency. This framework should be sufficiently specific both to guide and set limits on different aspects of protected area management. Without a clear policy framework to guide the development and implementation of Management Plans, managers for different protected areas may struggle to define their own policies for the same issues – not only duplicating effort, but perhaps also leading to potentially conflicting or inconsistent interpretations and directions

2.3 Pontcysyllte Aqueduct and Canal World Heritage Site

This chapter sets out how the World Heritage Site and its features are protected by means of national and local policy and guidance under the headings of cultural heritage, natural environment and land-use planning. A full description of the policy context, including further detail on the various heritage and environmental designations referred to in this chapter can be found at Appendix B.

2.4 British Columbia Parks: Guide to Writing Protected Heritage Areas Management Plans

3.2 MANAGEMENT OBJECTIVES AND STRATEGIES This section of the management plan provides the framework for how the protected area will be managed into the future and why. Known management issues, including threats to the integrity of features and

values as well as unrealized or new opportunities, should inform and be addressed by the management plan. At the same time, management objectives and strategies should more broadly convey what managers are trying to achieve within the protected area. It is critical to ensure that there is a clear link between proposed strategies and management objectives, and that adequate rationale or context has been provided for management decisions

2.5 Ontario's Protected Areas Planning Manual

Protected area policies

Policies are intended to guide what activities and uses are permitted or not permitted in a protected area. These policies are, in part, informed by the management actions identified during the values and pressures analysis (section 2.2.2). Policies are written to support the implementation of actions, opportunities (e.g. partnerships) and priorities including those activities subject to the Class EA-PPCR. All protected area policies must be consistent with overarching provincial policy.

The policy section identifies management themes and topics that may potentially apply. Consider which management themes and topics are applicable to the protected area, and provide clear and concise descriptions of the associated policies, consistent with overarching provincial policy direction and legislation.

2.6 New Zealand General Policy for National Parks

A national park management plan: will identify objectives and policies for the integrated management of the national park so that the unique qualities of the national park and indigenous species, habitats and ecosystems are preserved, and provision is made for public enjoyment.

2.7 Paparoa National Park Management Plan

- *Policies provide more detailed guidance as to how an objective and/or outcome can be achieved. They describe the course of action or guiding principles to be used for conservation management and decision-making.*

2.8 Example of a site specific policy for Watercraft in Paparoa National Park

Watercraft Ngā waka moana

Many of the rivers flow through, but are not part of Paparoa National Park, and are therefore not controlled by the Department. Other watercraft controls exist through Buller District Council's Navigation and Safety Bylaws.

Policies

3.9.1 Should allow independent non-powered watercraft (such as kayaks, canoes, rafts, paddle boards and waka), and may grant concessions for guided non-powered watercraft in Paparoa National Park.

3.9.2 Should not allow powered watercraft (such as runabouts, launches, hovercraft, cruisers, personal watercraft (e.g. jet skis) and powered sailing craft) in Paparoa National Park.

2.9 Analysis

The foregoing excerpts demonstrate that a policy framework is an essential part of a management plan. Their intent is clear, that being to provide a framework for day to day management of a protected heritage area. Parks Canada has a policy framework in the form of the *Guiding Principles and Operating Policies*. Overall these are very good and provide solid overarching management direction for the Agency. However, Parks Canada has not made best use of these by requiring management plans to include a policy framework that applies the Agency policies to the management realities of a specific park or site. Specific policies provide a level of detail not afforded by the general agency policies as demonstrated by the Watercraft Policy for Paparoa National Park. These make the management of a protected heritage area so much easier. Furthermore, high level policies are difficult for the public to access and understanding how they would apply to the management issues and opportunities is a challenge. This is a matter of transparency and accountability.

3.0 Contextual/Background Information

The management plan is the only public policy document that provides the public with an understanding of why a certain area or site is protected, the broader

landscape setting, what are its characteristics and values, how it will be managed and what actions will be undertaken to protect and present these values. As such, it is in the public interest that these documents are comprehensive so that all the information relevant to understanding management policies and actions is provided. The importance of an adequate amount of contextual/background information cannot be overstated.

Contextual information with sufficient detail provides the reader with a broad overview to understand the context of management policies and decision making. This is an essential element of accountability, because without an official description of the values of the protected area, how can park managers be held accountable for the implementation of actions to protect them.

The following are excerpts from plans or guidance regarding contextual information.

3.1 British Columbia Parks Guide to writing protected heritage areas management plans

KEY ROLE AND VALUES OF THE PROTECTED AREA

This section conveys how the protected area fits in to the provincial protected areas system. It describes the key features and exceptional values of the protected area that make it special. It provides important context for decisions about how the site will be managed. The subsections required in this section depend on the complexity of the protected area's values and role(s), as well as the area's designation type.

This section of the management plan should be descriptive, and provide the reader with a detailed picture of the protected area. It should highlight the various natural, cultural and recreational values within the protected area, and identify any notable features. This section should not discuss management issues, describe future opportunities, or provide management direction for the protected area.

3.2 Paparoa National Park, New Zealand

<https://www.doc.govt.nz/globalassets/documents/about-doc/role/policies-and-plans/national-park-management-plans/paparoa/paparoa-national-park-management-plan.pdf>

Provides a succinct section on features and values that, owing to its length, is not reproduced here.

3.3 Castle Provincial Park and Castle Wildlands Provincial Park

https://www.albertaparks.ca/media/6494620/castle_management_plan.pdf

This management plan has excellent and detailed description of park resources.

3.4 Pontcysyllte Aqueduct and Canal World Heritage Site, Wales

Description of Historical and Geographical Context, Ownership and Governance, community and stakeholder involvement and outstanding universal value and cultural significance.

3.5 Operational Guidelines for the Implementation of the World heritage Convention, Appendix A1

Provide baseline information on the state of conservation of the property, including an adequate description of it.

3.6 Hadrian's Wall and the Frontiers of the Roman Empire World Heritage Site

<https://hadrianswallcountry.co.uk/hadrians-wall-management-plan.pdf>

This management plan provides the reader with comprehensive information on its attributes, a description of the site and the wide range of values.

3.7 Parks Canada *Guidelines for Management Planning and Reporting*

Significance (½ page): *Describes the significance of the heritage place, the reasons for establishment or designation and any other values.*

Planning Context (1-1½ pages): *Outlines the circumstances particular to the heritage place with implications for planning and management, including trends and key issues the plan is responding to, current management arrangements and relationships.*

3.8 Wapusk National Park Management Plan

<file:///C:/Users/manuel%20stevens/Downloads/Wapusk-Management-Plan-2017.pdf>

This recently approved plan has one page describing the significance of the park and two pages of planning context.

3.9 Analysis

A review of guides and plans reveals that Parks Canada management plans provide the least amount of contextual and background information. The public is therefore not provided with a comprehensive overview of its values and other information. Neither is there an official approved statement of natural or cultural heritage values guiding the management of the protected heritage area. Referring to background studies or other sources is not an acceptable substitute.

4.0 Vision

A clear and comprehensive vision statement is an essential element of a management plan. One of the best descriptions of a good vision statement is from the IUCN Guidelines below.

4.1 Guidelines for Management Planning for Protected Heritage Areas (IUCN)

A long-term vision

The management planning process should develop and articulate an ideal condition, state or appearance for the future of the protected area. In some more recent plans, it has taken the form of a 'vision statement'. Vision statements describe the desired or envisaged result of the policies for the conservation of the protected area. Without this 'vision', a plan may have little coherent direction. Its purpose is to provide a focus or direction for management objectives. Importantly a vision statement should be aspirational. Whatever the form of wording of the vision for the protected area, it should:

- *describe the kind of protected area that the plan is seeking to achieve in the long term. This will help people to understand what it is hoped the area will be like in the future, the reasons for this, and the action needed to achieve the vision;*

- *be a long-term statement which is unlikely to change significantly over time. It should therefore provide continuity in the process of managing the park in a sustainable way; and*
- *include environmental, recreational, cultural and social and economic aspects of the protected area*

4.2 Pontcysyllte Aqueduct and Canal World Heritage Site

This vision, in the form of a statement and graphic, captures how they see the future. It is comprehensive, legible and inclusive.

To inspire people to celebrate, enjoy and value the Pontcysyllte Aqueduct and Canal World Heritage Site, safeguarding it for future generations.

Through partnership working with stakeholders and local communities we will:



4.3 British Columbia Parks Guide to Writing Protected Areas Management Plans

A management vision is a big picture statement that should reflect the protected area's role and significance within the provincial protected areas system. It should:

Be written in the present tense.

Be realistic but optimistic. While remaining realistic, the vision should encourage support or commitments that go beyond current difficulties and constraints, and see beyond immediate aims and objectives. It should build on the site's strengths and minimize weaknesses.

Be powerful and motivating. The vision should describe the desired management outcomes in a way that energizes and helps create a mental picture of the target.

Be succinct and written in non-technical language.

Be wide-ranging but specific. The management vision shouldn't be able to be used for multiple protected areas. It should be unique.

4.4 Operational Guidelines for the Implementation of the World Heritage Convention Appendix A1

A collective vision for the management of the property (e.g., where it should be in the next 20-30 years).

4.5 Paparoa National Park

The vision has been developed in partnership with Ngāi Tahu and the West Coast Tai Poutini Conservation Board, and in consultation with a wide range of community members and many other interested parties. It is therefore a vision that establishes a united approach to managing Paparoa National Park, one shared by the whole community. It will guide future advocacy, education and community awareness initiatives.

- Ngāi Tahu/Ngāti Waewae are kaitiaki of their ancestral lands and resources, and have living relationships with their whakapapa and traditions in Paparoa National Park.*
- Ngāi Tahu/Ngāti Waewae are actively involved in decision-making to protect taonga and the mauri and wairua of Paparoa National Park.*
- As far as possible, Paparoa National Park is preserved, valued and enjoyed by the public for its natural, historic and cultural features which are scientifically important, distinctive and unique.*
- The species and ecosystems of Paparoa National Park are valued and thriving, and make a major contribution to the wellbeing of the whole region.*
- West Coast communities and visitors recognise, appreciate and care for the special values of Paparoa National Park. They understand and embrace its unique history and take pride in its internationally recognised landscape, which provides an unparalleled visitor experience.*
- Visitors connect with local communities and experience a genuine interaction with the locals who take pride in sharing the Paparoa National Park with visitors.*
- The natural, historic and cultural importance of Paparoa National Park is clearly explained using carefully designed and located interpretation. This easily accessible information enriches the experiences of visitors. This vision is embodied in the text, objectives, outcomes, policies and milestones throughout the Plan and is underpinned*

by the legislation, which guides the protection of the natural character, health and wellbeing of this special place.

4.6 HADRIAN'S WALL WORLD HERITAGE SITE PARTNERSHIP BOARD

The Vision Our vision for Hadrian's Wall – a component of the developing trans-national Frontiers of the Roman Empire World Heritage Site – is of a World Heritage Site (WHS) that is:

- *recognised, locally, nationally, and internationally, as a cultural and historical asset of Outstanding Universal Value; • protected, and conserved in optimum condition;*
- *made accessible for all to learn about, to enjoy, and to contribute to, in ways which are sustainable;*
- *a driver for economic prosperity;*
- *a source of local identity and pride;*
- *actively supporting research;*
- *an exemplar of sustainable development in which increasing knowledge and understanding underpin all management and development decisions;*
- *contributing to the awareness of the aims and values of UNESCO.*

4.6 Draft Rideau Canal Management Plan vision statement

The heritage waterways managed by Parks Canada were once vital links for transportation and economic activity in what was to become Canada. Today, they continue to perpetuate this proud tradition in many Canadian communities by contributing to their socio-economic well-being. The Rideau Canal is a recreational paradise in Eastern Ontario and a landmark to nation building in Canada. Managed by Parks Canada as a premiere heritage waterway and World Heritage Site, the Rideau Canal strives for excellence in the delivery of unforgettable experiences that immerse visitors in the living history and natural beauty it embodies. It is a cultural destination – a symbol of integrity and authenticity – where its engineering works, heritage landscapes and historic buildings are well protected and appreciated. Parks Canada has transformed the Rideau Canal into a sustainable historic site through meaningful cooperation with Indigenous partners, collaboration with organizations that share its values, and innovative partnerships with the vibrant communities it connects. The site is an entry point for people in urban centres to experience examples of the natural and cultural experiences that Parks Canada offers across the country. It is also the

economic backbone of the communities of the Rideau Corridor, promoting outdoor recreation, low impact tourism and responsible development. The Rideau Canal serves as a symbol of commemorative integrity and is the best-preserved example of a slack-water canal in North America. In the years to come, Parks Canada will continue to work with its partners to elevate the Rideau Canal, both nationally and internationally, into a world-renowned, welcoming and lively site that inspires people to discover and connect with Canada's natural and cultural heritage.

4.7 Analysis:

The review of a few vision statements and guidance stress a shared vision, a clear picture of the future with a focus on an ideal state without the use of obtuse and dense language. The draft Rideau Canal is the antithesis of this objective. The focus, as with many other Parks Canada vision statements, is on tourism, recreation and economic development, with ecological integrity and heritage preservation given little attention. With so many images of the future, it is hard to obtain a coherent picture of the Canal's future. Compare this to the clear, concise vision for Hadrian's Wall.

5.0 Stakeholder/Public Involvement

Public or stakeholder involvement in the preparation of a management is recognized by all park management agencies as a prerequisite to a successful planning process. The following are a sample of approaches from elsewhere.

5.1 Pontcysyllte Aqueduct and Canal World Heritage Site

Community and Stakeholder Involvement

1.31 The Management Plan has been developed in close collaboration with stakeholders and local communities. A workshop was held for representatives of stakeholder organisations, including Town and Community Councils within which the World Heritage Site and its Buffer Zone sits, local authority officers and elected members, and community groups. Meetings and discussions have taken place with local community groups, civic societies and local businesses to identify community interests, issues and opportunities for the World Heritage Site. Close working has taken place with stakeholder partners such as the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty, in order to ensure a collaborative and consistent approach

to management that is beneficial to protecting the special characteristics of both the World Heritage Site and the AONB.

5.2 Operational Guidelines for the Implementation of the World Heritage Convention Appendix A1

The World Heritage Committee places considerable importance on the involvement of stakeholders in the process:

Opportunities for all stakeholders, especially property owners and managers, to be involved and have a shared understanding of the property, leading to strong support for the plan;

The plan should also reflect:

- Participation by key stakeholders and the wider community from the time of the preparation of the nomination, a shared understanding of the concept of World Heritage and of the implications of listing for property management;*
- A shared understanding of the current management system (the legal and regulatory framework, management structures and approaches), development plans and policies, as well as land uses which currently exist at the property;*
- A shared understanding among stakeholders of the OUV of the heritage property, the conditions of authenticity and integrity, and the factors affecting the property;*
- Shared responsibility and support among all stakeholders for the management approaches and actions required to maintain the property's OUV;*
- An inclusive approach to planning, sharing the task between all relevant authorities and stakeholders to draw up a feasible framework for decision-making that will ensure the sustainable management of the property into the future.*

5.3 IUCN Guidelines for Management Planning for Protected Heritage Area

Chapter 5 of this publication provided detailed guidance on public involvement.

Here is an excerpt:

Box 17. Benefits of involving people in management planning

Increased sense of 'ownership'. Communities living in or near the protected area, visitors and other users of parks will feel a far greater commitment to park management objectives and practices if they have the opportunity to be involved in determining those ends and means.

Greater support for the protection of the area. The success of a plan will depend on public and political support. It is essential to maintain regular communication with the public on decisions that affect them, and on the protection and use of the protected area.

Greater public involvement in decision-making, helping people to be aware of [and to feel they can influence] changes in management direction.

Links planning for conservation with planning for development. Not taking account of the needs of people in terms of economic and social development means a Management Plan has a poor chance of achieving its objectives.

Provides a mechanism for communication, where views, concerns and opinions on management of the area can be shared between the managers and stakeholders. This can lead to the identification and resolution of problems and to a greater understanding and support for the protected area.

5.4 New Zealand General Policy for National Parks

3 Public participation in national parks

3(a) Relationships should be developed with people and organisations to maintain and support national parks. These relationships should be based on mutual good faith, cooperation and respect.

3(b) Partnerships may be developed with people and organisations to maintain and support national parks.

3(c) Agreements may be negotiated and implemented to support relationships and partnerships.

3(d) People and organisations interested in national parks will be consulted when statutory planning documents for national parks are developed, including outcomes sought for places within national parks.

3(e) People and organisations interested in national parks should be consulted on specific proposals that have significance for them.

3(f) People and organisations should be encouraged to participate in the preservation of national parks and they may be supported with information and technical advice where this increases their relevant skills and their understanding of national park values.

3(g) Education and information should be provided, and events arranged, to promote awareness and active support for the preservation of national parks.

5.5 Paparoa National Park Management Plan

This Paparoa National Park Management Plan is the commitment of the Department of Conservation and West Coast Tai Poutini Conservation Board, working in partnership with Te Rūnanga o Ngāi Tahu and Te Rūnanga o Ngāti Waewae, to the community, business and others to secure the fullest proper use and enjoyment of the national park

consistent with the preservation of its natural, cultural and historic features and the protection and wellbeing of its indigenous plants and animals.

5.6 British Columbia Parks Protected Area Management Planning Process

<https://bcparks.ca/planning/docs/management-planning-manual.pdf?v=1615742979942>

2.2.6 Develop a Public Engagement Plan: A detailed guide to determine the scope and nature of a public engagement process.

5.7 Ontario Parks Management Planning Process

Guideline to Involvement During Protected Area Management Planning

This guideline provides direction to Ministry of Natural Resources and Forestry staff on providing involvement opportunities when preparing or amending management direction. This guideline provides a process for developing an involvement strategy for Aboriginal communities, the public and stakeholders.

5.8 Castle Mountain Provincial Park, Alberta

Excerpt from section 1.5 The Planning Process:

During the pre-planning process and development of this management plan, First Nations and stakeholders were engaged directly through a variety of meetings and one-on-one discussions. Over 40 meetings were held between May and November 2016 and, where feasible, recommendations and advice from those meetings are reflected in the plan.

During the development of Castle Provincial Park and Castle Wildland Provincial Park management plan, two stakeholder working groups were established. One working group focused on matters of ecology, and the other on issues of land use. Individuals with knowledge and expertise in ecology and land use provided recommendations and advice to help shape the management plan.

5.9 Parks Canada Guide to Management Planning

A description and shortcomings of Parks Canada's public involvement policies are addressed in part 1 so there is no need to repeat it here.

5.10 Analysis

Stakeholder involvement is regarded as a critical aspect of management planning as demonstrated by the excerpts above. All agencies provide detailed policy direction for stakeholder involvement in the form of guides or policies. World Heritage Operational Guidelines and the IUCN Guide place substantial emphasis on stakeholder involvement. Examples from park management plans demonstrate that as well.

PART 3

Public access to planning directives, guides and related documents

An indispensable characteristic of an open, transparent, inclusive and accountable planning system is public access to the full range of documents directing and guiding the preparation of management plans. This is a vital prerequisite to a planning process that invites public scrutiny of the draft plan and other documents in the context of the requirements of the authority. Without access to these documents, the public will never know if the planning process has been “following the rules” so to speak, or even, if the process and end result achieves the mandate of the authority. Access to and understanding of the process sends a powerful message to stakeholders that the management authority is fully transparent and has nothing to hide. Furthermore, an understanding of the process among stakeholders constitutes a valuable feedback mechanism whereby they will be able to provide advice on the elements of the planning process that may require revision or fine tuning.

Analysis:

The Parks Canada *Directive* and *Guidelines* are not posted on the Agency website. The only publicly available statements of management direction are the *Guiding Principles and Operating Policies*. These have been public for many years. The *Directives and Guidelines* are written for internal use as is evident by the use of jargon, and are therefore largely not understandable to the public.

In contrast, every other park management authority examined in this critique has made its planning guiding policies, directives and guidelines available to the public on the internet by just typing the name of the park authority and management planning. Not only that, they are written without jargon and present the full range of information required to produce a management plan.

This situation speaks to the internal focus of Parks Canada’s management planning direction. Throughout both the *Directive* and the *Guidelines*, the focus is on meeting agency legislative requirements among other statements indicating that the plans would have a management focus. Plans need to have that management focus, but stakeholders must also see themselves in the plan for it to have public support.

In the interest of accountability, transparency and inclusiveness, it would be in Parks Canada's interest to make its *Directive and Guidelines* public and re-write them to make them readable. There needs to be a user friendly website that is inviting and informative and encourages interaction with Parks Canada. The current website is anything but and says nothing about planning. Compare that to the Alberta Parks website:

<https://www.albertaparks.ca/media/6493720/alberta-parks-management-planning-process.pdf>, that in two pages presents the process and how the public can be involved. Parks Canada has a page for the Banff National Park Management Plan review process, but does not have a user friendly web page for management planning in general.

Conclusion:

This critique has three objectives:

- to evaluate the Parks Canada *Directive* and *Guidelines* for Management Planning,
- to compare Parks Canada management planning directive and guidelines, and resultant management plans, against similar directives and management plans for protected heritage areas elsewhere around the world, and
- to analyze the degree of transparency, that being, the amount, type and level of detail of the management planning process and related documents available to the public.

The critique has concluded that:

- Parks Canada's management plans cannot be regarded as such as they do provide policy direction among other matters to manage a protected heritage area,
- Parks Canada's management plans and planning processes compare unfavourably to those examined from elsewhere. This is especially glaring with regard to IUCN Guidelines and the World Heritage Centre Guidelines for the preparation of management plans.
- Parks Canada does not provide the public with access to its Directive and Guidelines and whereas every other authority does so.
- Parks Canada's stated commitment to inclusiveness, transparency and accountability ring hollow.