

# **The De-Evolution of Parks Canada**

by

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A report on how Parks Canada has abandoned their legislated heritage mandate for the Rideau Canal, a National Historic Site of Canada and a UNESCO World Heritage Site.

September 2015

*(Updated October 2016)*

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## Updates

This is a dynamic document, it will be updated as issues referenced in this document change. The original text will remain (since it was valid at the time this document was written) but an UPDATE section will be added to make note of any changes.

**May 14, 2016:** Added updates to several sections. Most notably due to the May 10, 2016 infrastructure funding announcement.

There is a core problem with the government dealing with Parks Canada issues (which they basically are not) is new Minister's mandate for both Environment and Climate Change. Given the priority of the many difficult issues surrounding climate change, my guess is that the Minister spends 95% of her time on those issues and has not looked in depth at other issues. She certainly hasn't looked in depth at the many problems the old government created within Parks Canada. We (Rideau Canal) would have been far better off if the government had chosen to make Climate Change a separate ministry, providing us with a Minister of Environment that had the time to tackle the deep rooted problems with the current structure and direction of Parks Canada.

**October 20, 2016:** Minor updates – the Government of Canada has still not taken any action with Parks Canada to restore the effects of the 2012 cuts and the non-legislated policies placed on Parks Canada by the previous government (i.e. revenue generation at the expense of heritage).

*Note: while this report deals specifically with Parks Canada's management of the Rideau Canal, it applies generally to Parks Canada as a whole, an agency that has lost its way not only in the management of our National Historic Sites and UNESCO World Heritage Sites but also in the management of our National Parks, our National Park Reserves, and our National Marine Conservation Areas.*

## Synopsis

In 1972 Parks Canada took over the management of the Rideau Canal\* and six other historic canals in Canada from Transport Canada. The Government of Canada directive for this change was to have *"a shift in emphasis in the management of the canal systems from "transportation" to historic restoration, preservation and interpretation; natural environment preservation and interpretation and the optimum use of federal lands."*

Parks Canada followed this directive for the next 20 years to the great benefit to our knowledge of the heritage value of the Rideau Canal to Canada. During this time period they greatly enhanced their capacity to do heritage (historians, archaeologists, etc.) and did a great deal of heritage work. They conducted site studies of the lockstations, initiated heritage research (i.e. Manuscript Reports), developed Commemorative Integrity (heritage protection) protocols, encouraged cultural tourism, improved the heritage presentation of the lockstations, and developed heritage interpretation and outreach programs.

This heritage awareness of the Rideau Canal peaked in November 1987 when the Historic Sites and Monuments Board recommended *"that the Rideau Canal be established as a national historic park, or, failing that, be managed as such."* This was approved by the Minister in charge of Parks Canada.

However, by that time, the die was already cast; Parks Canada was already in its downward spiral. It started with budget cuts in 1982 and an emphasis on cost recovery at the expense of heritage and ecology. The cuts in 1982 slowed down but didn't stop heritage work on the Rideau, but larger cuts in the mid-1990s forced Parks Canada to drastically reduce heritage work. On the Rideau Canal, the mid-1990s cuts meant cessation of heritage research and archaeology, closure of libraries, loss of interpretive programs and a re-evaluation of operating policies. Within Parks Canada this started a shift in corporate culture away from heritage and ecology, the core principles of Parks Canada, as they struggled to administer a large number of National Parks and National Historic Sites with a shrinking budget.

The 2000s saw some limited recovery as the Rideau Canal became a World Heritage Site (a process started before the cuts in the 1990s). But it was essentially lip service; internally Parks was shifting to becoming a tourism agency, adopting the Visitor Experience Opportunities Concept (VEOC) as a core part of their new operational model, a model that has essentially no heritage component. By the mid-late 2000s National Parks programs such as Learn to Camp were being implemented on the Rideau Canal while heritage presentation was ignored. Means of public input such as the Rideau Canal Advisory Committee were terminated and general heritage support dropped. It was about to get worse.

The year 2012 brought with it what appeared to a relatively modest 5% budget cut to the operating budget of Parks Canada – a cut of \$29.2 million dollars. This cut decimated Parks Canada. Now, operating essentially as a tourism agency, it abandoned its mandate *"to protect and present nationally significant examples of Canada's natural and cultural heritage"*. Many of its heritage staff (historians, archaeologists) were "surplused" (let go). The Government of Canada had a direct hand in what was kept and what was cut. For instance, the Underwater Archaeology Branch was kept fully intact to continue a special project supported by the Prime Minister's Office. To protect National Parks (environment gets votes, heritage doesn't), cuts to National Parks were much less severe than cuts made to National Historic Sites. The Rideau Canal took an operational cut in excess of 20%.

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\* The Rideau Canal includes the subsidiary Tay Canal which is also under Parks Canada's administration.

The Government of Canada took further actions. One was to ensure that Parks Canada continued to "de-evolve," making revenue generation the primary goal (higher priority within the corporate structure of Parks Canada than environment or heritage). It's very telling that in all of Parks Canada's and the Government of Canada's communications about the Rideau Canal in 2012, the word "heritage" never appeared, even though the Rideau Canal is a National Historic Site of Canada and a UNESCO World Heritage Site.

This has economic implications to the communities that border the Rideau Canal. Revenue generation, as being done by Parks Canada, is primarily revenue generated for Parks Canada, it's not an economic contribution to the region. What does make a significant economic contribution to the surrounding communities is the heritage experience people get at the lockstations, reasons for them to come back and invite their friends and neighbours to visit and spend money in local communities. But most lockstations are looking tired and run down, some literally falling apart, and heritage interpretation, which includes the heritage appearance of each lockstation, is no longer being done.

The Conservative government in 2015, announced 40 million dollars of new funding over 5 years is for safety of persons issues (repairing dams, berms and bridges). While this funding barely touched on heritage structures, it was a good start. In 2016, the new Liberal government added \$57 million of infrastructure funding over 5 years to take care of some, but not all of the deferred work on heritage structures listed in Parks Canada's 2012 National Asset Review.

In 2012, the Rideau Canal was merged with the Trent-Severn Waterway into a new Parks Canada unit called Ontario Waterways, a process done in secret with apparently little planning. The Superintendent of the Rideau Canal was replaced by a Director of Ontario Waterways, making the top management of the Rideau Canal a part time job. The merger showed that Parks Canada's upper management has no understanding of the uniqueness of the Rideau Canal, it is operating the Rideau Canal just as Transport Canada used to do, as a simple recreational waterway. Parks Canada's heritage and ecological mandates are no longer being applied.

Parks Canada also closed itself to public access, a process started in the mid-2000s. Gone were the days of being able to freely get information from Parks Canada staff, instead information requests, even very simple ones, now had to go through communications staff in order to "control the message." This policy of restricting public information even extended to the Parks Canada Agency Act, which in 2012 was stripped of important components of transparency and accountability such as audit and public reporting requirements. In 2016 there were some small changes that opened up the public dialog, partially on the need to complete a new management plan which requires extensive public consultation.

At the same time, the Government of Canada continued (and continues) to add new National Parks, new National Marine Conservation Areas and new World Heritage Sites without adding the associated funding to Parks Canada to manage those new sites. In 2012 the government stated that they had increased the amount of "protected park spaces" administered by Parks Canada by 50% since they took power in 2006. This 50% increase was done with no additional funding to Parks Canada. Their operating budget in 2006 was \$587,435,000 which is \$682,390,000 in 2015\$ and in 2012 Parks Canada spent \$620,000,000 which is \$648,000,000 in 2015\$. The budget provided by the government to Parks Canada was going down while responsibilities being given to them by the Government of Canada were dramatically going up. Something had to give, and what gave was Parks Canada's core mandate, the presentation and preservation of our natural and cultural heritage.

Now in 2016 we see that getting people to sit in a red chair or camp in an oTENTik is Parks Canada's primary focus on the Rideau Canal. Heritage not only isn't being done, it's not even being talked about. The Director of Ontario Waterways stated in 2015 that "revenue generation" is Parks Canada's focus on the Rideau Canal. This is the sorry state of Parks Canada's administration of the Rideau Canal today.

## Government Operation of the Rideau Canal

The Rideau Canal is the oldest continuously operated canal in North America (one of the reasons for its World Heritage designation). It was built by the British using contractors supervised by the British military and funded by British parliamentary grants, and was opened in 1832.

In 1856 the canal was transferred from the British Ordnance Department to the Upper Canada Board of Works.

In 1868 it was transferred to the Federal Government of Canada and was operated by the various federal government departments of transport.

In 1972, as a result of growing Canadian heritage awareness resulting from Canada's centennial in 1967, the Rideau Canal and six other historic canals were transferred from the Department of Transport to Parks Canada. At the time Parks Canada was part of the Department of Indian and Northern Affairs (then in 1979 under the Department of Environment, then under the Department of Canadian Heritage and then back to the Department of Environment).

We can pin the start of heritage awareness of the Rideau Canal to be 1925. It was a year before the 100th anniversary of the start of construction of the canal. In its early years the Rideau Canal served as the main immigration route into Upper Canada, was a part of a significant Canadian commercial water route from the Great Lakes to the Port of Montreal, and also served as a military deterrence to the U.S. It remained a viable commercial waterway to the end of the 19th century. At that point, due in part to the fact that the Rideau Canal is a waterway connecting lakes and rivers, it evolved into a recreational waterway. By 1925 there was little commercial navigation on the Rideau Canal, but it was still well used and people looked back to what the canal meant to the history of Canada.

Accordingly, on May 15, 1925, the Rideau Canal was designated a **National Historic Site of Canada**, in part because of the significance of:

- the construction of the canal system,
- the survival of a high number of original canal structures,
- the unique historical environment of the canal system.

It was recognition in the "modern" age, where roads and trains had replaced the direct commercial value of a canal, that the Rideau Canal has an important place in Canadian history, beyond its direct role as a transportation route or as a recreational waterway.

The heritage awareness of the canal languished until the 1950s, when, likely due to the efforts of Robert Legget, Lt. Colonel John By, the Superintending Engineer in charge of building the Rideau Canal, started to be recognized, including being named a Person of National Historic Interest in 1954. Then, leading up to Canada's centennial in 1967, rehabilitation of some of the blockhouses was done (i.e. Narrows and Newboro). This was the first significant work on heritage structures not related to the operation of the Rideau Canal and it was done in recognition of the heritage value of the Rideau Canal, part of a larger awareness of Canadian heritage brought about by Canada's centennial.

In 1967 the Canada-Ontario-Rideau-Trent-Severn study committee (C.O.R.T.S.) was formed and it initiated several studies ranging from a survey of all pre-1880 buildings in the Rideau Corridor to a report on the recreational potential of the Rideau Canal and Trent-Severn Waterway. It was C.O.R.T.S. that helped to lay the framework for the takeover of the canal by Parks Canada.

## Parks Canada Takes Control

In 1972, the Rideau Canal and six other historic canals (Trent-Severn Waterway, Carillon Canal, Sainte-Anne-de-Bellevue Canal, Saint-Ours Canal, Chambly Canal, and St. Peters Canal) were transferred from the Department of Transport to Parks Canada. The Lachine Canal was added in 1978 and the Sault Ste. Marie Canal was added in 1979.

The Government of Canada directive for this change was: *"Under the Conservation Program there should be a shift in emphasis in the management of the canal systems from "transportation" to historic restoration, preservation and interpretation; natural environment preservation and interpretation and the optimum use of federal lands."*

The Rideau Canal at its basic level is a navigable waterway and a water management system. The water management has to be continued in perpetuity since the entire waterway is a flooded environment. The current water levels are manmade and the dams, berms and weirs on the system have to be maintained. It's also a navigable waterway and operating locks are needed to maintain that navigation. This aspect of the canal supports a diverse tourism industry (boating, fishing, accommodations, food services) that is of critical economic importance to the rural portion of the canal (Kingston Mills to Long Island) and also an important economic contributor to the cities of Ottawa and Kingston. This basic level of the canal, a simple recreational waterway and water control system, was how it was managed under the Department of Transport.

The reason for the Parks Canada takeover was to add the core values of its mandate; natural heritage (ecological elements) and cultural heritage (historic elements), to the operation of Canada's historic canals. That's why Parks Canada was chosen to administer the canal and not some other government department. Parks Canada's responsibility is to maintain the canal at its basic level (water management and navigation) plus meet its mandate of natural and cultural heritage preservation and presentation.

When Parks Canada took over in 1972, there was a push for Parks Canada to work more co-operatively with other levels of government, specifically provincial governments. Although the water and lockstations are federal, the lands surrounding the Rideau Canal are provincial. Anything that Parks Canada does on the canal impacts surrounding provincial lands and communities. Accordingly a new program known as the Agreements for Recreation and Conservation (ARC) was formed.

Co-operation between Parks Canada and the provinces didn't last long – the ARC program was terminated in 1984. Parks Canada at that time, as today, suffers from a paternalistic attitude, preferring to go it alone rather than forming co-operative partnerships.

Parks Canada did take to heart the Government of Canada's directive to shift the emphasis on the Rideau Canal from transportation to *"historic restoration, preservation and interpretation; natural environment preservation and interpretation."* They significantly increased their capacity to do quality heritage work by adding historians and archaeologists to their staff. A problem that would later adversely affect the Rideau Canal was that this heritage staffing was done at the headquarters level, the heritage expertise and management didn't go down to the field level.

Lots of work was done starting with site studies of all the lockstations. For instance, the first site study (Site Study 0) looked at the Jones Falls lockstation. It was published in 1973 and investigated all aspects including the basic operation of the lockstation, the historical fabric, policies related to historic canals as they apply to Jones Falls, planning issues, and restoration and historical interpretation recommendations.

Also at this time several heritage studies were initiated. The reports of these studies became part of the Parks Canada Manuscript Report series. These were detailed investigations by experts into various facets of the Rideau Canal, everything from the engineering of the locks to the history of recreational use of the

canal. These reports are some of the most significant heritage work that Parks Canada has ever done. It greatly expanded our knowledge of the heritage value of the Rideau Canal. Of note, there are some very large gaps in this research, for instance heritage studies of significant lockstations such as Jones Falls, Merrickville and Ottawa have never been done.

Parks Canada also developed Commemorative Integrity Protocols relating to the Rideau Canal, developed plans for cultural tourism, and developed heritage interpretation programs. Lots of work was done to preserve and present the Rideau Canal as a heritage site.

The budget cuts of the 1980s slowed down the research and HQ support of the Rideau Canal, but momentum to recognize the Rideau Canal as a heritage site continued, culminating in November 1987 when the Historic Sites and Monuments Board recommended that the Rideau Canal *“be established as a national historic park, or, failing that, be managed as such”*. This was approved by the Minister in charge of Parks Canada.

## **The Decline of Heritage Support by Parks Canada**

Heritage support was already on the decline by the time it was recommended that the Rideau Canal become a National Historic Park in 1987. The budget cuts of 1982 had gone largely unnoticed on the Rideau Canal since it was celebrating its 150th anniversary that year. But changes were happening at headquarters level, heritage support for the Rideau Canal was being significantly reduced.

The first really visible blow came with the budget cuts of the mid-1990s which terminated all remaining heritage work on the canal. Interpretation programs were cut, the Rideau Canal Library was closed, staff was let go, all research and archaeology ceased. Parks Canada re-evaluated its operating policies for the Rideau Canal. Despite a report (Corridors of Change, 1995) that had several good recommendations for how to move forward, very few were implemented.

Ironically, it was at this time that the drive to World Heritage Status was started. In 1992, just before the major cuts, Friends of the Rideau, under Larry Turner, started the push to get the Rideau Canal designated as a UNESCO World Heritage Site. This eventually led to the official nomination process in the mid-2000s.

The late 1990s provided a small heritage revival. The Rideau Canal library was re-opened, some interpretation programs were restored and there was even the development of a Rideau Canal Educational Kit for schools. A heritage issue, noted by the author to Parks Canada in 1997, was that there was a complete lack of interpretation signage at the lockstations. To Parks Canada's credit they recognized this deficiency once it was pointed out to them and came up with a set of interpretive signs by 2000 that were placed at all the lockstations.

By this time, all historical and archaeological research had ceased. Caroline Phillips, Senior Archaeologist with the Ontario Service Centre of Parks Canada, during a talk given to Friends of the Rideau in the spring of 2007, lamented the fact that for the past decade she'd been unable to conduct scientific archaeology on the Rideau Canal even though there were many sites deserving of such attention. The only exception was an underwater archaeological investigation of the Rideau Canal in the late 1990s. However, while an extremely valuable heritage program, the only reason Parks Canada did it was for management, rather than scientific purposes. Management wanted sensitive archaeological locations identified in their GIS system to streamline the permitting process which requires archaeological clearances. With the site archaeologically mapped they didn't need to have an archaeologist review each permit, they could just look it up in their GIS system. While the work was



excellent, some significant sites were missed in the surveys and these have never been revisited since Parks Canada has chosen not to do any more heritage work on the Rideau Canal.

A significant component of heritage administration is meaningful public consultation. One of the recommendations in the 1995 Corridor of Change report was the formation of a Rideau Canal Advisory Committee, consisting of public representation that covered the geographic regions of the Rideau Canal (Kingston to Ottawa) and the three main aspects of Parks Canada's administrative mandate for the canal; recreation/tourism, ecology, and heritage. In addition to the advisory capacity of the committee, it worked with Parks Canada to create the first Rideau Canal Symposium in 2001, bringing together a large group of both government and public representatives to discuss the Rideau Canal.

In 2003, Parks Canada was slammed by the Auditor General in her November report. In a chapter titled "Protection of Cultural Heritage in the Federal Government" the Auditor General raised red flags about the sorry state of Canada's Built Heritage, including many heritage structures that are the responsibility of Parks Canada to look after. *"Built heritage is threatened. Many of the national historic sites administered by the Parks Canada Agency are showing signs of deterioration."* That of course included the Rideau Canal. On the Rideau very little was done to address the Auditor General's concerns.

During the early 2000s the push for World Heritage was stumbling forward. A hold-up was a new UNESCO requirement for each member state (country) to submit a tentative list of 10 sites that would be submitted in the future. Canada formed a committee to create this list and they spent a few years trying whittle potential sites down to the required 10 – eventually settling on 11 in 2004. The Rideau Canal had the preliminary work already done and the Government of Canada agreed that it would be the first from the list to be submitted. It still took 3 years, and in 2007 the Rideau Canal was designated a UNESCO World Heritage Site. However, the promise of heritage support for this designation was to be largely ignored by Parks Canada.

Part of the reason for this was the large cultural shift in the senior management of Parks Canada which seemed to take place in the 1990s and early 2000s. Parks Canada at this time was turning away from its core mandate of environmental and cultural protection and presentation to a primary focus on revenue generation, their main vision of which is recreational tourism. While Parks Canada always had a revenue generation component it was secondary to their primary mandate of ecology and heritage. Parks Canada's upper management misunderstood that the public enjoyment of our National Parks and National Historic Sites is for educational reasons as much as recreation, to learn about the natural and cultural heritage of these sites. The primary purpose of our National Parks is not to get people out camping, it's to educate them about the natural and cultural values of those parts of Canada.

There is no question that visitors to many of Parks Canada sites (outside of strict ecological reserves) are very important. In fact boaters using the locks on the Rideau Canal are an integral part of the heritage presentation of the canal, since it is only when a boat goes through a lock that land-based visitors get to see a lock in operation. But visitors to the Rideau Canal should first and foremost be given a heritage experience – educating those visitors on our Canadian heritage that the Rideau Canal represents should be the main focus for Parks Canada.

But by the mid-2000s the focus became almost exclusively simple tourism. Parks Canada adopted a new tourism model, the Visitor Experience Opportunities Concept (VEOC), on which they started to base their visitor "services." On the Rideau Canal this was a huge step backwards since the VEOC carries no direct heritage component and in fact seemed to be in conflict with their heritage programming. The implementation of this new concept on the Rideau Canal was a mess. See the VEOC section for details.

This was somewhat masked by the 175th anniversary celebrations on the Rideau Canal in 2007 and its designation that year as a UNESCO World Heritage Site. The World Heritage Site designation held the

promise that Parks Canada would return to its core mandate of heritage protection and presentation. This was not to be.

By 2010 it was becoming very clear that Parks Canada had very little interest in supporting the heritage of the Rideau Canal. So much so that the author wrote an article at that time titled "Has Parks Canada Lost Its Way on the Rideau Canal?" and compiled a multi-page laundry list of heritage issues that were being ignored by Parks Canada. By this time the Rideau Canal Office of Parks Canada had sealed itself off from public input, was doing very little of the public outreach as promised by their own management plan and refused to address the many heritage issues that were piling up. Even very simple, low cost issues, such as the heritage appearance of lockstations, was being ignored. It was about to get worse.

## **The Cuts of 2012**

The cuts mandated by the Harper government in 2012 had a devastating effect on Parks Canada. In hindsight it was a twofold attack – one was the actual cuts, an apparently modest 5% cut in the operating budget and the other was a shift to full-on revenue generation as the new, unlegislated, primary mandate for Parks Canada. How the cuts were done calls into question the competency of Parks Canada management and the amount of political influence in the process.

In a nutshell, the 2012 cuts on the Rideau involved in part:

- A 24% cut to the operating budget of the Rideau Canal.
- Merging the Rideau Canal and the Trent-Severn Waterway into one operational unit known as Ontario Waterways.
- The elimination of the Superintendent position for the Rideau Canal (semi-replaced by a Director of the combined Rideau and Trent-Severn).
- Severely curtailing the operational hours of both the Rideau Canal and Trent-Severn Waterway.
- A pricing model proposal for the canals that had no basis in reality and involved price increases of up to 400%.
- Elimination of the already very limited heritage interpretation on the Rideau Canal.
- The closure and removal of two local Parks Canada Rideau Canal libraries.
- Elimination of the Ecologist and Heritage Planning positions for the Rideau Canal.
- Elimination of the Visitor Experiences Officer position (such as it was).

Overall in Parks Canada the cuts included eliminating much of their heritage and archaeological staff – a highly visible signal of the future direction Parks Canada planned to take. At the same time the Harper government made significant changes to the Parks Canada Agency Act, removing accountability and transparency requirements that had been part of the original Act.

## **The Parks Canada Agency Act**

The re-writing of the Parks Canada Agency Act to remove transparency and public reporting requirements was one of the things that flew under the radar during the many issues that came up with the severe budget cuts and the highly secretive change in the operational model of the Rideau Canal in 2012. The following are a few of the sections of the Parks Canada Agency Act that were significantly changed.

**Pre-2012: Section 32 (2)** The Minister shall review the management plan of a national historic site or other protected heritage area every five years and shall cause any amendments to the plan to be tabled with the plan in each House of Parliament.

**2012 Changes:** The Minister shall review the management plan for each national historic site or other protected heritage area at least every 10 years and shall cause any amendments to the plan to be tabled in each House of Parliament.

This is actually a major change, extending reviews of the management plan from 5 to 10 years. The 5 year management plan review for the Rideau Canal should have been done in 2010. That process was actually started in the spring of 2010 but, for reasons unknown, halted by Parks Canada despite being a legislated requirement at that time. Even the 10 year review is not being followed on the Rideau Canal. The last management plan, which dates to 2005, was made obsolete by the 2012 changes, and as of 2016, there is still no new management plan. Management plans for the Rideau Canal have always had a large public input component. In 2016 the process to do a new management plan was started and some public consultation was initiated – it is expected this process will continue into 2017 and the first draft of the plan will tell whether that public input was incorporated into the plan.

**Pre-2012: Section 33 and Section 34.** These are long sections but worth a close read since both these sections were repealed in their entirety in 2012.

### **Corporate Plan**

33. (1) The Chief Executive Officer must submit to the Minister, before March 31 of each year and beginning the year that the Agency is established, a corporate plan for the operations of the Agency and the Minister must, after the plan is approved by the Treasury Board, table a summary of the plan in each House of Parliament on any of the first thirty days on which that House is sitting after the plan is so approved, at which time the plan shall be made available to the public on request.

#### *Contents of corporate plan*

(2) The corporate plan must include

(a) a statement of the Agency's objectives, management strategies to achieve those objectives, expected performances and associated financial budgets for the approaching fiscal year and the four following fiscal years; and

(b) any other information that the Treasury Board may require to be included in it.

#### *Terms and conditions for approval of plan*

(3) The Treasury Board may specify any terms and conditions that the Treasury Board considers appropriate for the approval of a corporate plan or an amendment to a corporate plan.

#### *Restriction on activity*

(4) The Agency shall not carry on any activity in a manner that is inconsistent with its corporate plan as approved by the Treasury Board.

### **Annual report**

34. (1) The Chief Executive Officer must, before September 30 of each year following the Agency's first full year of operations, submit an annual report on the operations of the Agency for the preceding year to the Minister and the Minister must table a copy of the report in each House of Parliament on any of the first thirty days on which that House is sitting after the Minister receives it.

### *Contents of annual report*

- (2) The annual report must include (a) the financial statements of the Agency and the Auditor General of Canada's opinion on them;
- (b) information about the Agency's performance with respect to the objectives established in the corporate plan and a summary statement of the assessment by the Auditor General of Canada of the fairness and reliability of that information;
- (c) any other information that the Minister or the Treasury Board may require to be included in it; and
- (d) a summary of any report prepared under subsection 35(1) during the year for which the annual report is submitted.

**2012 Change:** sections 33 and 34 were repealed in their entirety.

This has a major impact on the transparency and accountability of Parks Canada. The Corporate Plan and Annual Report are significant ways of ensuring that both Parliament and all Canadians are aware of what Parks Canada is doing. These were valuable documents and a major part of the public accountability of Parks Canada. Now gone as legislated requirements.

### **Pre-2012: Section 36: Audit**

36. The Auditor General of Canada shall annually
- (a) audit and provide an opinion on the financial statements of the Agency;
  - (b) provide an assessment of the fairness and reliability of the information about the Agency's performance as set out in the Agency's annual report; and
  - (c) provide the Chief Executive Officer and the Minister with a report on the audit, opinion and assessment.

**2012 Change:** Section 36 was removed in its entirety

This is perhaps the most shocking one. Every government agency should have a legislated requirement for the Auditor General's review, it's a fundamental part of the check and balance on government. This was obviously clear to the government when the Act was written and its removal was obviously clear to a government wishing to concentrate power in the Prime Minister's Office (PMO).

Although not directly related to the Rideau Canal, the addition of sections 6.1 (1), (2) and (3) to the Act (go on-line to see the full Act) together with section 7 (2): *"(2) For the purposes of section 6.1, the Governor in Council may, by order, add to or delete from the schedule any Act of Parliament or regulation made under an Act of Parliament, or part of such an Act or regulation, that relates to the environment."* This allows the party in power to bypass Parliament, giving the power instead directly to the PMO. It's a tangible illustration of some of the rationale behind the changes to the Act, done to benefit the PMO, not the citizens of Canada.

These all have a tangible effect on heritage since the transparency of Parks Canada and external reviews by the Auditor General are critical oversight components regarding how Parks Canada is following its legislated mandate.

## The 2012 National Asset Review

Presumably to address the many concerns about the Built Heritage assets of Parks Canada brought to light by the Auditor General in 2003, Parks Canada initiated a cursory review of all of its heritage assets and in 2012 produced a report. As with most information compiled by Parks Canada in recent years, this was labelled a state secret even though it should have been a public document, and was only released on a Freedom of Information Request.

The 2012 National Asset Review identified the value of the heritage assets on the Rideau Canal to be 928 million dollars in current (2012) replacement value. It also looked at the amount of deferred work, repair work that should be done but had been deferred due to lack of government funding. In 2012 that number totalled 104 million dollars for the Rideau Canal. That report identified that of the 50 locks on the Rideau (including the Old Combined Locks at Smiths Falls), only 2 were in good condition, with 34 in fair condition and 14 in poor condition.

In 2015, the Conservative government announced 40 million dollars over 5 years in infrastructure funding to deal with “safety of persons” issues (bridges, dams, berms). That funding did not directly deal with the heritage assets, only 2 of the 48 locks in poor to fair condition received funding. In 2016, the new Liberal government announced \$57 million in infrastructure funding over 5 years to deal with some, but not all of the deferred work listed for heritage structures in the 2012 National Asset Review.

The reason why the heritage assets on the Rideau Canal are in such poor condition is the dramatic undercapitalization of the Rideau Canal in recent years. Expressed in 2015 dollars, the capital budget for the Rideau Canal in 1975 was 13 million dollars (1.4% of the value of the asset base). In 2013 the capital budget was only 1.9 million dollars (0.2% of the asset base). The continued undercapitalization of the Rideau Canal in the last two decades has allowed the various heritage structures on the Rideau Canal to severely deteriorate. The injection of 97 million dollars in special funding over 5 years, while very welcome, is still short of what is needed. The Rideau Canal continues to be badly undercapitized and will lead over time to the same situation as outlined in the 2003 Auditor General’s report.

## The VEOC

The poster child for the wrong direction that Parks Canada has taken is the VEOC. That mouthful of an acronym stands for Visitor Experience Opportunities Concept. It’s a conceptual tourism model that Parks Canada adopted in the early 2000s. The introduction of the VEOC in Parks Canada goes to the issue of what is the core mandate of Parks Canada and the arguments of what parks and historic sites are all about. Is a National Park an ecological preserve where the prime purpose of having visitors is an educational one, or is the prime purpose simply getting as many bodies as possible through the gate and paying various user fees? Is the primary mandate of Parks Canada that of steward of our many significant natural and cultural heritage sites (as its legislated Act states), or is it simply a tourism agency? This greatly affects how Parks Canada allocates its resources and develops its operational policies. Parks Canada provided the answer quite clearly in 2012 when they fired much of their heritage and ecological staff.

On the Rideau Canal the VEOC showed up in tangible form in 2007 with the introduction of a Visitor Experiences Officer (VEO). What should have showed up, given the UNESCO World Heritage designation of the Rideau Canal in early 2007, was a Heritage Manager for the Rideau Canal, but that didn’t happen (the Rideau Canal has never had a Heritage Manager). The VEOC, as implemented by Parks Canada, has no direct heritage component, and this was made abundantly clear on the Rideau Canal National Historic Site with the VEO who had no interaction with the Rideau heritage community and focused on non-heritage programs such as the National Parks’ Learn to Camp program.

In 2013, in the wake of the 2012 cuts and the public backlash on the Rideau Canal, a public component of the VEOC was launched as a sop to the public, to show that the government was in fact doing something positive for the Rideau Canal. The project was funded by Parks Canada with a \$49,210 grant to the Valley Heartland Communities Futures Development Corporation and a former Parks Canada employee was hired as the consultant.

This program was badly flawed from the beginning, since it was simply a blue sky visioning exercise to come up with tourism ideas for the Rideau Canal. On the surface this perhaps sounds laudable, but the VEOC lacks the most critical piece need to achieve any success, implementation methodology. Conceptual ideas are easy to come by, it's the economically sustainable implementation of any of those ideas that is the real challenge. Implementation methodology is critical if anything tangible is to happen, but they are completely lacking in the VEOC. The VEOC exercise did allow the government to promote that it was doing something to help the Rideau Canal even though the only result was a very expensive report. Tellingly, in the promotion of the report, Parks Canada stayed in the background with a local MP and Valley Heartland doing the public presentations.

With no implementation or economic components, the public VEOC is a lame duck document full of mostly re-cycled ideas. Unfortunately, the illusion of it as a useful document continues to be promoted by Parks Canada, local tourism agencies and some local politicians. It is a wonderful document in that regard, full of conceptual ideas with no commitments or tangible means of implementation.

**OCTOBER 2016 UPDATE:** the above still stands, Parks Canada continues to pursue the VEOC at the expense of heritage interpretation and education (which they won't even talk about). In a May 9, 2016 letter received from the Hon. Catherine McKenna (but written by Parks Canada), it cites the 2013 "consultations" about the VEOC and uses the installation of oTENTiks as an example (since nothing tangible has happened on the Rideau south of Ottawa). So, bottom line, Parks Canada continues to go down this wrong direction rabbit hole. They need to listen to local communities and return to their core mandate.

## **Rideau Canal and Ontario Waterways**

One of the most damaging changes in 2012 to the Rideau Canal by Parks Canada was the complete change in the management structure with the merger of the Trent-Severn Waterway and the Rideau Canal into a single management unit. The change was done quickly, in secret, and apparently, based on the results, with very little planning.

The top field management position on the Rideau Canal used to be a Superintendent. That position was replaced by a Director of Ontario Waterways, in charge of both the Rideau Canal and Trent-Severn Waterway, making the top management of the Rideau Canal a part time job. The Director spends most of her time with Trent-Severn issues and has never had the inclination in almost four years on the job to discuss Rideau Canal heritage issues even though several requests have been made.

The second most critical position on the Rideau Canal is the Manager of Operations (second in command to the Superintendent). That position was unfilled by a permanent staff person in 2012 (it had an acting manager). When a new person was given the position they left after a year and it went back to having junior staff acting in that position. In late 2015 that position, as "Associate Director" was filled, with that person based on the Rideau. That was a good move and it has improved things considerably, however the reality check is that it's still a part-time job for the Rideau and many heritage issues are still not being dealt with.

This merger goes directly against the reason Parks Canada rather than the Department of Transport is administering these canals. The merger shows a complete lack of understanding by Parks Canada's corporate management of how they are supposed to be operating the Rideau Canal. On the surface, both the Trent-Severn and Rideau Canal are canals and water management systems. But from a heritage perspective, they are completely different. The Rideau Canal is much older than the Trent-Severn and built for very different reasons. It therefore has a unique history and a different relationship with the communities that grew up around it. The Rideau Canal is also a UNESCO World Heritage Site, recognizing its importance to the development of early Canada. The two canal systems are also very different in the regions they run through, both ecologically and culturally. These very important differences have been completely lost in the merger.

Part of the rationale for the merger seems to be cost savings and efficiencies. But that isn't actually the case since there was very little duplication in the two systems. The two canal systems are located physically far apart and any staff located on one system who are also supposed to be doing work on the other are not doing anywhere near the same quality of job as someone working full time on a local system. The best example of this is the Director, who is absent from the Rideau Canal most of the time and is letting many Rideau Canal issues, such as heritage, slide.

Even supposed duplication of services such as water control aren't working with the merger. There was flooding on the Rideau Canal in the spring of 2014 due to water control mismanagement by Parks Canada. With the head of water control located on the Trent-Severn (which has its own very significant water control issues) – it showed a clear non-understanding of how water management on the Rideau Canal is supposed to be done.

It's a poorly planned experiment that hasn't worked. At the very least, the Rideau Canal, as a large unique canal system and a UNESCO World Heritage Site, needs a dedicated full-time manager. It's not a part time job.

## **The Public Good**

This is a somewhat ethereal concept, but it boils down to "is the Rideau Canal worthy of tax dollar support – is it a 'public good' for Canada." An easy example is a highway, it is recognized as a public good, it benefits Canada and we support the use of tax dollars to build and maintain them. We as a nation made the decision many years ago, when the concepts of National Parks and National Historic Sites were developed, that these too were part of the public good. Protecting and presenting ecologically and historically significant portions of Canada are public goods. Parks Canada was formed on this premise. That's the ethereal part. The public good extends far beyond economic benefits, there are also social benefits including appreciating and understanding our environment and appreciating and understanding our Canadian heritage. Unfortunately, there are a lot of people, including apparently many politicians, who do not understand this.

The Auditor General in 2003, in discussing the issues surrounding Parks Canada's shoddy care of our Built Heritage, perhaps said it best:

These places recall the lives and history of the men and women who built this country, and they foster awareness of how Canadian society evolved. They help us to better understand the present and prepare for the future. They contribute in important ways to Canadians' sense of belonging to their community. When important parts of Canada's Built Heritage are lost, future generations of Canadians are deprived of access to key moments of their shared history.

This leads into the debate about revenue generation, how much of a National Park or National Historic Site administered by the Government of Canada should be paid for by tax dollars and how much should be paid for by other means such as user fees.

## Revenue Generation

Revenue generation has been part of the operation of our National Parks and National Historic Sites for some time now. On the Rideau Canal, it has included everything from obtaining revenues from private hydro electric generation on the canal to leasing federal lands. In terms of public use of the site, revenue generation takes the form of lockage fees which were introduced on the Rideau Canal by Parks Canada in 1975. Since the “site” is actually 24 different sites (lockstations) spread out over 202 kilometres, there are no entrance fees charged to land based visitors (as there are in National Parks and some single location National Historic Sites).

The general premise of revenue generation is fine, the problem comes when it supplants the core mandates of Parks Canada and becomes the sole focus of management such as is the case today on the Rideau Canal. At a presentation in Quinte West in April 2015 the Director of Ontario Waterways, Jewel Cunningham, stated “We are focusing on increasing revenue.” She was just stating the reality that this has now become essentially the sole focus of Parks Canada, presumably reflecting the Harper government attitude that National Historic Sites should be made to pay their own way, that they are not part of the public good.

The Rideau Canal is spending huge dollars on this new prime focus on revenue generation. They formed a new business unit which, on its own, is costing them approximately \$400,000 per year plus of course the huge amount of time that management is spending on revenue generation issues. On the other hand, they are spending essentially nothing on heritage, either in dollars or in time. There are no heritage staff, no heritage programming, no heritage outreach. If they spent half the effort on heritage that they are on revenue generation they’d be close to meeting their legislated mandate.

The conflict between revenue generation and heritage is not new. Parks Canada managed to drive off one of the nicest boat tours on the Rideau Canal, no, not Paul’s Boatlines in Ottawa, which they did drive away in 2015 due to their heavy-handed and unskilled approach, but Rideau Canal Boat Tours in 2012. This was a small tour boat taking tourists on a trip from Chaffeys Lock through Davis Lock to the Jones Falls Lockstation. The operator even converted his tour boat from diesel to electric power to make it more environmentally friendly, providing a silent tour so that wildlife seen along the trip could be better appreciated. The operator talked about the natural and cultural heritage of the areas the boat was passing through. Visitors loved it. It was both a pleasurable and a learning experience. It also directly served one of the stated roles in Parks Canada’s charter: “We are storytellers recounting the history of our land and our people – the stories of Canada.” That’s exactly what the tour operator was doing, telling the story of the Rideau Canal.

The initial arrangement, after much frustrating bureaucratic red tape, was a fixed fee lease agreement for the use of some dockage space at Chaffeys Lock. This was accepted by the operator, he could incorporate it into his business plan and set his own fees accordingly. That changed in 2012 when suddenly Parks Canada demanded 6% of the gross revenue from the tour boat operator rather than a fixed fee dockage lease. Note that this is a percentage of the gross revenue, not the net. It added a huge element of economic uncertainty to the tour, in fact it appeared to make it uneconomic.

This was brought to the attention of the Superintendent, Don Marrin, by the author since it appeared to directly conflict with Parks Canada’s mandate. The Superintendent agreed that the tour operator was serving Parks Canada’s interest in getting people out onto the Rideau Canal and telling the story of the



canal. This wasn't someone making money from the canal by selling hot dogs or offering water ski lessons. This was someone actually delivering a core component of Parks Canada's mandate. But the Superintendent claimed to be powerless to do anything. Since revenue generation trumps heritage presentation, he couldn't alter the terms of the dockage lease even though it would have been in Parks Canada's best interest to do so if they were following their own legislated mandate.

Revenue generation continues to trump heritage. Since 2012 there have been more examples of this as Parks Canada continues to follow what is presumably a Government of Canada directive to pursue revenue generation at all costs, even the cost of their legislated mandate.

Until the Parks Canada Agency Act is changed through Parliament (with open debate) to make revenue generation a legislated mandate, heritage and environment should trump revenue generation. Parks Canada should first be ensuring that they meet their mandate. The Government of Canada should be funding Parks Canada to a level where it can do that. Revenue generation, which is fine if done properly, has to be done within the context of meeting their mandate. This is certainly not the case today.

**OCTOBER 2016 UPDATE:** the above still stands, the new government has yet to change the direction of Parks Canada as mandated by the previous government. Revenue generation still remains a top priority, being done at the expense of heritage – the government has yet to direct Parks Canada to return to their legislated mandate, to make the Rideau Canal a dynamic and educational heritage experience.

## **Economic Benefits of Rideau Canal Heritage to the Rideau Corridor**

The Rideau corridor is a term used to encompass all the communities that border the Rideau Canal, from Perth to Delta, from Kingston to Ottawa. Many of these, particularly the rural communities, have an economic base in tourism. The Rideau Canal plays a very significant role in providing tourism benefits for the local communities. This is in part what the battles over hours and fees in 2012/13 were all about, what Parks Canada does on the Rideau Canal greatly impacts local economies.

Revenue generation by Parks Canada is primarily focussed on earning revenue for itself, not for these communities. Heritage preservation and presentation on the other hand do provide an economic contribution to local economies. Providing visitors with an interesting and dynamic heritage experience at each lockstation attracts more visitors and keeps them here longer. This was one of the promises of UNESCO World Heritage designation, it was going to increase tourism and benefit local economies. But that didn't happen since visitors don't get a dynamic heritage experience on today's Rideau Canal.

The phrase "looking tired and rundown" has been applied to many lockstations. They aren't an ideal visitor experience. The Jones Falls lockstation, located in the Township of Rideau Lakes, is a good example of this. The 1973 Parks Canada site study report dealing with Jones Falls and how it should be presented to the public, recommended that Jones Falls be interpreted with a focus on engineering, since it's arguably the best example of 19<sup>th</sup> century engineering on the whole system.

The Great Stone Arch dam at Jones Falls is a remarkable structure. One of the engineering principles is the curved shape of the dam and how it is locked into the bedrock on either side, that's part of the fundamental engineering design. But you can't see that at Jones Falls today since Parks Canada has allowed trees to grow up right beside the dam. Visitors cannot see the dam in its entirety, they can't see how it is locked into bedrock, they can't see how 19<sup>th</sup> century engineering principles were applied. Parks Canada is well aware of this problem, the author has lobbied for many years to have the trees removed to provide a clear view of the dam. It almost happened in 2007, the site received the required environmental clearances to remove the trees, but it was never done. It's a very low cost item, so funding isn't the issue. It remains an illustration of how Parks Canada management doesn't understand the heritage of the site.

The story of the large stones used to construct the locks and dam, which were quarried near Elgin, 9 kilometres away, then brought to the site over rough roads, is only given a cursory mention, their full story is not being told. In fact, one of the old haul roads used for the transport of those stones, which is located at the Jones Falls lockstation, has been partly buried by new fill dumped on it, likely because present-day Parks Canada management doesn't even know it exists. It's one of the reasons the author has made an invitation (several times) to the current Director of Ontario Waterways to take a tour of Jones Falls, to see these heritage presentation issues first hand. It's an offer she's yet to accept.

There are many other issues at this site. The view to and from the Lockmaster's House is also obscured by trees, its position on the landscape, which speaks directly to the heritage of the site, cannot be visualized since the view is completely obscured. The location of the Lockmaster's House originally provided a clear view of the approaches to the lockstation, the lockmaster could stand on his porch and see vessels approaching. Or, in a time of war, see enemy troops approaching (the Lockmaster's House is designed as a defensible structure with gun slits in the stone walls). Environmental clearances to open up one of those heritage views was also completed in 2007, but no vegetation (mostly scrub trees) was ever removed. The building itself used to be interpreted at the minimal cost of a summer student. That interpretation was terminated in 2012 and the building remains closed to the public.

In 2007, a "temporary" repair of the lock quoins (large corner foundations of the locks) was done in bright white modern cement, ruining the heritage appearance of the locks. It was supposed to be a short term repair since Parks Canada's policies don't allow for this type of repair unless it is temporary. But there are no plans at present to do the proper, heritage appropriate, repair. The same type of modern looking repair was done a couple of years later to the water control weir. The repair was done with no consideration to heritage presentation (the weir is highly visible to the public).

The old Blacksmith's Shop used to have a blacksmith in residence during the summer, that person did blacksmithing, demonstrating how iron was forged for the locks, and took people on tours of the lockstation. In 2012 that position was "surplused" and the shop emptied. You can't even see into the building, the single window has been replaced with a piece of plywood painted to look like a window.

The wooden bridge leading to the lower locks is literally falling apart. The outer edges of the bridge (the parts falling apart) were roped off in 2007 as a temporary measure to ensure they didn't hurt any visitors, a situation that remains to this day. The 2016 infrastructure funding announcement included both the bridge and the locks. However the "short term repair" quoins are still not slated for their needed long term repair. There are still many spots where concrete is spalling and prime photography viewpoints are obscured by scrub brush. The "tired and rundown" aspects of the site have yet to be addressed.

Bottom line is that Jones Falls could be a wonderful heritage experience for the visitor, encouraging them to spend more time on the site and to invite their friends and neighbours to visit. They will shop in Elgin, Newboro and Westport, buy gas in Portland, stay in the Hotel Kenney, the Opinicon or a local B&B, eat at a local restaurant, rent a boat from a local marina, all of this providing a direct economic benefit to the Township of Rideau Lakes.

While Jones Falls is a shining example of what is wrong with Parks Canada's management of the Rideau Canal, the same, to one degree or another, can be said for every lockstation on the Rideau Canal. If all the lockstations were preserved (fixed up) and presented as per Parks Canada's mandate, it would be an economic boon to the region.

**OCTOBER 2016 UPDATE:** I did get to tour a portion of Jones Falls in August 2016 with the new Associate Director, the first management person in Parks Canada to take me up on my tour offer since 2007. The many heritage issues were viewed and discussed. Unfortunately Parks Canada still doesn't have the capacity (no heritage staff) to deal with the many issues – but they have been officially brought forward.

## Public Access to Information

We are supposed to be living in a free and open democracy. But that's not how Parks Canada operates these days when it comes to information. If we jump back fifteen years, the Rideau Canal Office of Parks Canada supported the free and open exchange of information with the public. You could ask a question of anyone, one of the engineers, the ecologist, the visitor services officer, the water management officer, the librarian, the Superintendent – anyone with the knowledge to answer the question was free to do so. You could walk into the office and easily get permission to browse the library. Staff were friendly and freely answered any question.

This changed in mid-2000s. Suddenly there was a Communications Officer, not to encourage communication, but to control it. A combination lock showed up on the door of the Rideau Canal Office (which used to be unlocked during business hours), a small but tangible item that physically showed Parks Canada's new attitude to public access.

Today it's even worse, questions sent to the Rideau Canal Office of Parks Canada either get a cursory answer, or a few days after the question is asked, an answer written in bureaucratised (presumably by "communications" people in Parks Canada HQ). Staff operate under a gag order, afraid to say anything lest they be reprimanded by management. It's a sorry state in a country such as ours that is supposed to support the free and open exchange of information, including (and perhaps especially) government.

This has also translated into restrictions on information that should be freely available to the public. One of the best examples of this is the Periodic Report to UNESCO on the state of the Rideau Canal World Heritage Site. This is a report done by Parks Canada that was sent to UNESCO in July 2013. Parks Canada to date has refused to release it. It should be public information. It's not a state secret, it offers no competitive advantage to anyone, there is no reason in the world why that report should be restricted. But Parks Canada has chosen to do so.

Another example is Parks Canada's 2012 National Asset Review. It should have been a document available through a simple request or even publicly posted on their website. But it took a Freedom of Information Request from the media to pry it from Parks Canada's hands. Why? It makes absolutely no sense.

This trend of restricting information is also a costly one for taxpayers. These days, all reports are digital. If you want to make it public or give it to someone, you create a PDF of the document and pop it on your website or email it. It's a simple, quick, and inexpensive process. A Freedom of Information Request on the other hand is very expensive. Parks Canada has to evaluate the request and then if, through whatever arcane process they use, they deem that it can be released to the public, they image scan a paper copy of the report and release that. Outside of being an expensive process, it, presumably intentionally, makes the document much more difficult to use than the original digital document. Plus the process can literally take years. It's antiquated, stupid, expensive and certainly doesn't belong in what is supposed to be an open 21st century democracy.

**MAY 2016 UPDATE:** A Treasury Board directive has told departments that only the \$5 filing fee is to be charged (no extra fees for finding & processing the documents) and that an FOI response should be provided "in formats that are modern and easy to use" such as spreadsheets or wordprocessing documents. The government is working on legislation to formalize this.

**OCTOBER 2016 UPDATE:** I've been trying since June to get a copy of Parks Canada's review of the 2005 management plan (the review was completed in the spring). I've been hesitant to waste their time and

our tax dollars with an FOI request since this should be a simple matter of handing it over. But nothing yet, so it appears that access to information is still being restricted.

## Public Engagement

Public engagement is one of the most important parts of Parks Canada's mandate – in terms both of public input and public outreach. The Rideau Canal is not some isolated park, it passes through many communities (13 municipalities) and has thousands of residents living on its shores. What Parks Canada does on the Rideau Canal directly impacts on the economies and cultures of those communities and the residents that live along the Rideau Canal.

Parks Canada used to recognize this fact, they have stated it in writing in various documents. In their 1999 State of Protected Heritage Areas report they wrote:

Two sites, Dawson Historical Complex and the Rideau Canal, indicate that their respective "designated places" are under threat because of change or potential change in areas beyond their jurisdictional limits. Sites such as these, which derive much of their value from being an integral part of larger, functioning communities, face the recurring problem that outside development may threaten some of their most significant resources and values. Management at such sites must rely on education and cooperative work with stakeholders in the larger community to ensure the commemorative integrity of the site.

That's a pretty clear statement to the fact that they need to engage the public and work co-operatively with the Rideau community in order to meet their mandate, something that is not happening today.

The following are several quotes from the current (2005) Rideau Canal Management Plan, with analysis following each quote. These are statements made by Parks Canada of how they are supposed to run the Rideau Canal:

**(7.1)** Heritage presentation refers to interpretation, communications and outreach education programming that provides opportunities for enjoyment and active learning. The purpose of heritage presentation is to provide visitors with opportunities to appreciate and understand the Rideau Canal, first as a national historic site, and as part of the Rideau Waterway, a Canadian Heritage River. Opportunities also exist to learn about its history and its cultural and ecosystem values and to engage and motivate Canadians to participate in the preservation of this heritage.

Presentation of the reasons why the Rideau Canal is a national historic site is fundamental to ensuring commemorative integrity and is thus a program requirement as identified in the Historic Canals Policy and Cultural Resource Management Policy.

This is part of the pre-ambule to the section dealing with heritage presentation. To that statement we can now add the heritage presentation and public awareness requirements of the Rideau Canal as a UNESCO World Heritage Site. It's a pretty clear statement of how Parks Canada is supposed to follow their heritage mandate on the Rideau Canal. They are supposed to be doing heritage interpretation, communication and outreach. The main comment here is that they are now doing essentially none of this.

**(7.3)** Outreach and educational programming have high potential for growth.

This is a bit of an understatement since when you're at the bottom the only way to go is up. In 2005, there was limited outreach and educational programming. A direct educational initiative, an EduKit that was to be introduced in schools, had been dropped. Outreach (offsite engagement) extended to showing up at a few events with a blacksmithing display or a small interpretive trailer. Today none of this exists.

**(7.5.1)** Continue to present the Rideau Canal story in greater detail at the five major interpretive nodes (Kingston Mills, Jones Falls, Smiths Falls, Merrickville and Ottawa Locks). Where required, modifications to the existing presentation programming will be made to more fully convey the heritage messages as identified in the Commemorative Integrity Statement.

The programming at these locations consisted of a few staff or summer students in period costume. At Kingston Mills there was a student who interpreted the Blockhouse. At Jones Falls there was a blacksmith demonstrating his trade in the old Blacksmith's Shop and a student interpreter in the old Lockmaster's House (Sweeney House). At Smiths Falls, Parks Canada supported the Rideau Canal Museum with a staff position and maintained the building. At Merrickville a summer student interpreted the locks and the Merrickville Industrial Heritage Complex and at the Ottawa locks summer students helped with general interpretation. It was pretty minimal even back then.

Today the Rideau Canal story is no longer being told at Kingston Mills, Jones Falls or Merrickville. In Smiths Falls, the entire Board of Directors of the Rideau Canal Museum resigned in 2012, handing the museum back to Parks Canada (Parks Canada owns the building). Parks Canada changed the name from the Rideau Canal Museum to the Rideau Canal Visitor Information Centre and have kept it limping along. It has low visitation and no programming. Ottawa is currently the best presented lockstation, it has some summer student interpretation and Parks Canada has introduced their Xplorer program for children which is a good, although very small, initiative.

Other lockstations, each of which has its own interesting story, have never had any dynamic interpretation and have minimal static site interpretation (a sign or two).

**(7.5.1)** Present messages related to the national significance of the Rideau Canal and Parks Canada national messages through outreach and education programs including internet websites, learning travel, school programs, etc.

Basically none of this is being done. Their website has a bit of fluff history on it, there is no learning travel, no school programs and no etc.

#### **7.5.2 Key Actions in Co-operation with Others:**

**(7.5.2)** Work with the Rideau Canal Museum in Smiths Falls as the primary focus for presentation of the Canal.

As noted above, the Rideau Canal Museum folded in 2012. It is also a mistake by Parks Canada to have a structure such as the former museum be considered the primary focus for the presentation of the canal. The Rideau Canal lockstations are each a potential learning site, far better than any museum. The heritage of the Rideau is not buried under a parking lot (except in Smiths Falls where the old canal dam is literally buried under a parking lot), the heritage of the Rideau Canal is still highly evident today at each lockstation. The full interpretation of each of the lockstations is far more valuable than trying to stuff it all into some building. A museum can have a useful role if operated properly but it should never be the primary focus for the presentation of the Rideau Canal.

**(7.5.2)** Co-operate with other heritage interests to communicate the cultural and ecological values of the Canal corridor to encourage public involvement and private stewardship.

Parks Canada does not do this anymore. In the past they've worked with and supported various heritage groups but this is no longer the case. In the early 1980s Park Canada started up the Parks Partnership Program which provided seed money and support for the creation of many "Friends of ..." groups. It was a tangible recognition that the public can play a significant role in delivering Parks Canada's ecological and heritage mandates for its National Parks and National Historic Sites. They terminated that program several years ago and the few "Friends of ..." groups that have survived are now limping along on their own.

**(7.5.2) Develop an outreach program for young Canadians focused on messages of national significance.**

There is no such program except for the Parks Canada Xplorers program meant for young children (ages 6 to 11) and just recently introduced to the Rideau Canal (only at the Ottawa Lockstation). A much more extensive and educationally useful youth program, which included the development and distribution of a Rideau Canal Edukit, was abandoned in the early 2000s.

**12.0 Ongoing Partnership and Public Involvement:**

Public stakeholder groups have had a long history of involvement related to the management of the Rideau Canal. There are a wide variety of organizations with an interest in the future of the Canal. Heritage groups, lake associations, fish and game clubs and tourism interests all contribute to the quality of the Rideau environment and its public use opportunities.

These groups and the general public have an expectation of ongoing consultation for many aspects of Canal management, as well as production and implementation of this plan. The attainment of the vision for the Rideau Canal will depend to a large extent on how Parks Canada can involve most stakeholder groups in the implementation of the actions in this plan on an ongoing basis.

A litmus test for Parks Canada will be how well they involve the public in the preparation of their next management plan. An updated management plan was originally slated to be done in 2010, the process was started and then stopped. The changes to the Parks Canada Agency Act in 2012 moved the requirement to 10 years, which should have been 2015. There are indications that Parks Canada plans to do a new plan in 2016 and, as recognized by Parks Canada in their 2005 plan, it must involve meaningful public input if it is to have any relevance.

The statement is correct in that for Parks Canada to make the Rideau Canal a dynamic place and meet their mandate in terms of natural and cultural heritage, they need to work co-operatively with these groups. This is not happening today – Parks Canada is going it alone, shutting out involvement from the various stakeholder groups on the Rideau Canal.

**12.1 Key actions by Parks Canada:**

- The Rideau Canal Advisory Committee will continue to function as a primary means of consultation in the management of the Canal. The Committee embodies diverse interests and experience with a stake in the future of the Canal. The Committee will be consulted on all major decisions in the management of the Canal.

- Establish a communications strategy to transmit important information and involve the public in policy, facility and activity planning where their participation would be appropriate.
- Support the Rideau Canal Advisory Committee in convening a periodic symposium on the challenges facing the Rideau Canal.
- Nurture the establishment of networks of similar interests within the Canal corridor and support their objectives.
- Continue to support the objectives of the Friends of the Rideau and the Rideau Waterway Land Trust Foundation.
- Prepare an annual assessment of the progress of implementing the plan and inform the public.
- Prepare a State of the Canal report every five years prior to the management plan review.
- Undertake a formal review of the management plan on a five year cycle.

The Rideau Canal Advisory Committee (RCAC), one of the most important forms of public input to Parks Canada, was effectively terminated by Parks Canada in 2008. There was a brief revival (2 meetings) with a new Superintendent in 2011 and then it was terminated again. Efforts to have the current Director of Ontario Waterways re-establish the committee have failed. As can be seen in the 2005 Management Plan it was clearly recognized by Parks Canada that the RCAC was a key component of public involvement. The current management of the Rideau Canal has no interest in any public involvement.

A review of the other items on the above list is quite simple. There is no communications strategy to involve the public in policy, facility and activity planning. There are no more Rideau Canal symposiums. There are no more networks (Parks Canada pulled their support from the Rideau Heritage Network a few years ago, effectively killing it). There is minimal support for Friends of the Rideau and the Rideau Waterway Land Trust Foundation. There is no annual assessment of the management plan, or at least none that has been made public. There is no State of the Canal report. The management plan has not been reviewed since the last one was put in place in 2005.

The 2005 Management Plan actually stated quite well what Parks Canada should be doing. While more could and arguable should be done, if they simply did what they said they would do the Rideau Canal would be in a far better state today.

**MAY 2016 UPDATE:** the above still stands but a new management plan (1 year overdue) is in the works. Due the compressed timeframe for the new plan (because Parks Canada didn't get around to doing it on time) there will be limited public consultation (the previous plan had 2 years of consultations). The new plan is going to be more of framework plan (as opposed to a work plan) – so there are niggling worries that there will be no accountability with the plan (the details will be in the secret yearly work plans for the Rideau Canal). We'll see how it plays out over the summer of 2016.

In terms of general public engagement, I came across a great quote from Larry Ostala, former Vice-President of Heritage Conservation and Commemoration at Parks Canada who, in 2010 (while still working for Parks Canada), wrote:

Greater efforts will also have to be made to engage both local communities as well as communities of interest to make national historic sites focal points for community activity and community life and, ultimately, accessible community resources. Traditionally, staff at many sites have chosen both how and when to engage and involve these communities. At times, they have been largely excluded from site operations and activities and called upon only to participate in a given site initiative on the basis of

meeting a particular requirement of Parks Canada's, such as consultation related to management planning. **For meaningful engagement of these communities to take place, this must change, and the agency must be willing to engage citizens both on their terms and on the basis of their needs and interests, as well as our own.**

*The George Wright Forum, Vol. 27, No. 2, 2010, p. 167*

**OCTOBER 2016 UPDATE:** The management plan appears to have been delayed until 2017, presumably in part because of the issue of a compressed timeframe for public consultation as noted above.

## A UNESCO World Heritage Site

"But isn't the Rideau Canal a World Heritage Site?" is often the response from the public when the fact that Parks Canada is virtually ignoring Rideau heritage is brought up. Yes it is but there isn't a recognition of this by either politicians or Parks Canada when issues surrounding the Rideau Canal are brought forward. As previously noted, the word "heritage" never appeared in Government of Canada or Parks Canada communications during the debates in 2012 surrounding the deep cuts to the canal and the change in management structure. Even a 2011 Parks Canada executive presentation on the historic canals it administers, which asked the question "are historic canals national historic sites?" never mentioned that the Rideau Canal is unique in that it is the only one that is a UNESCO World Heritage Site.

The evaluation of the Rideau Canal by UNESCO during the nomination process in 2006 looked at a number of things including the heritage resources Parks Canada had available (heritage staff), legislation, and the management plan. Those three things have changed dramatically since the canal was made a World Heritage Site in 2007. Heritage staff (in HQ) were "surplused" in 2012, legislation has been changed, and the management plan on which the nomination was based is no longer being applied.

This is perhaps a reason why Parks Canada is keeping their 2013 Periodic Report to UNESCO a state secret – they likely said that everything is just fine with the Rideau Canal. But it is clearly not when it comes to the World Heritage Site designation. In addition to all the heritage preservation and presentation issues outlined in this report, Parks Canada also promised to follow a recommendation by UNESCO to protect the visual values of the Rideau Canal. They've only paid lip service to this with an all government committee (no public input), a highly flawed consultant's report, and no protection (by which UNESCO means legislated protection) to date for the canal.

Outside of all the heritage issues that Parks Canada is ignoring, the Government of Canada is in clear violation of the World Heritage Convention, which Canada signed in 1976. The World Heritage Convention states that countries must ensure the "*protection, conservation, presentation and transmission to future generations of the cultural and natural heritage*" of the site "*to the utmost of its own resources.*" Clearly Canada is not applying the requirement "*to the utmost of its own resources*" to the Rideau Canal. The Government of Canada made a commitment when it nominated the Rideau Canal to follow the World Heritage Convention and it is not doing so.

It does take a lot to get a site de-listed and the Rideau Canal is not in immediate threat of that, in part because neither Parks Canada or the Government of Canada have informed UNESCO of the impacts of the 2012 cuts or the fact that their management plan is no longer in force and that they are now out of the heritage business.

But it could happen and we have an example of it, the Dresden Elbe Valley in Germany which was de-listed in 2009. It had been designated a World Heritage Site in 2004 based on the cultural landscape of the valley. Inappropriate development that impacted on the visual values of the site led to the de-listing. That inappropriate development was allowed to go forward mostly due to the lack of public awareness of the



valley as a World Heritage Site. It was lack of public outreach by the Government of Germany regarding the World Heritage Site designation of the Dresden Elbe Valley that got the site de-listed. The public didn't know why it was a World Heritage Site, they didn't know or understand the heritage values that the designation represented, and so they didn't care. Those same conditions exist on the Rideau Canal today.

**MAY & OCTOBER 2016 UPDATE:** no change other than new infrastructure funding.

## Federal Government Role in the Decline of Parks Canada

Clearly the real blame for Parks Canada moving away from their mandate falls squarely on the Government of Canada. In some cases it was direct manipulation, such as how the 2012 cuts were applied and the changes that year to the Parks Canada Agency Act. The revenue generation "mandate" of the current Parks Canada administration started with the concept of cost recovery, initially done in conjunction with the delivery of natural and cultural heritage protection and presentation. With the Harper government not in favour of supporting ecological and heritage sites with tax dollars, revenue generation has turned into the prime mandate of Parks Canada.

Equally damaging though is the continued addition of new National Parks, new National Marine Conservation Areas and new World Heritage Sites without the addition of the required funding to support them. Funding and resources for those new sites have to be stolen from existing Parks Canada sites. On the Rideau Canal this has resulted in the cessation of essentially all ecological and heritage work using the false argument that the government can't afford it.

This expansion of "protected park spaces" – National Parks, National Park Reserves, and National Marine Conservation Areas – is driven by public pressure. It attracts the most media and is a factor in how many people vote. Environmental groups have given targets of the amount of protected spaces that Canada should have. The numbers vary, but in terms of National Parks, Parks Canada stated in 2012 that they were 70% complete (60% according to environmental groups) with 43 National Parks and National Park Reserves. In terms of National Marine Conservation areas there were 5 in 2012 representing 17% of the target. There are more National Parks, National Park Reserves, and National Marine Conservation Areas being added every year, further stretching Parks Canada's ability to manage its existing sites.

The Harper government has been under fire for being environmentally unfriendly and they needed to do something to show that they were in fact "green". Adding lots of "protected park spaces" without adding any additional budget to Parks Canada was clearly seen as a good solution. It certainly made for a good talking point in Parliament. In 2012 the government stated in Parliament "*Mr. Speaker, it is worth noting that under our government's tenure we have increased protected park space by over 50%. It is our government that has been committed to protecting our country's natural heritage through our parks program ...*" (Hon. Michelle Rempel – September 28, 2012). Parks Canada's operating budget in 2006 (the start of the Harper government tenure) was \$587,435,000 which is \$682,390,000 in 2015\$ and in 2012 when Michelle Rempel made the above statement Parks Canada spent \$620,000,000 which is \$648,000,000 in 2015\$. Parks Canada is being required to manage 50% more park space with no associated increase in budget.

In addition, to gain political points, the Government has added a huge new responsibility to Parks Canada, the Rouge National Urban Park located in the vote-rich Toronto area. This park, which just happens to be adjacent to the riding of the Minister of Environment at the time, Peter Kent, was outside of Parks Canada's mandate and legislation. It required new legislation (the Rouge National Urban Park Act) and changes to the Parks Canada Agency Act. New federal government funding for this park falls well short of what is required and this has further diverted Parks Canada from its core mandate, pulling already stretched resources away from our existing National Parks.

For heritage sites the situation is actually much worse since heritage is not perceived as vote getting, it can be ignored with little political consequence. This of course goes right to a fundamental point of democratic government, what governments do to get re-elected versus what is best for Canada. They often aren't the same. We see this clearly on the Rideau Canal, not only in its operation as a National Historic Site by Parks Canada, but its operation as a UNESCO World Heritage Site. Most of what should be done as a World Heritage Site is either being ignored or simply paid lip service to. The government gets the cachet of making the Rideau Canal a UNESCO World Heritage Site without actually having to fund and operate it as such.

As previously noted in the National Asset Review section of this report, the 2015 government announcement of 40 million dollars over 5 years for safety of persons issues (bridges, dams and berms) does little to deal with the heritage problems. Only 2 of 48 locks on the Rideau Canal that are in Poor to Fair condition are included in this funding. The 2015 value of deferred repair work is now estimated to be 155 million dollars. The 40 million over the next 5 years barely makes a dent in this.

In 2015, in addition to the 48 locks that need repair work, we've started to see other significant maintenance issues crop up including lock gate failures in the middle of the operating season. Parks Canada doesn't have sufficient funds to do the required replacements of these aging gates. It's very worrying and it's directly due to the Federal Government undercapitalizing the Rideau Canal.

**OCTOBER 2016 UPDATE:** new infrastructure funding for Parks Canada is making good inroads in the backlog of work, including funding to double the gate making capacity (from 3 per year to 6). On the Rideau, the backlog of deferred work has been reduced, but not eliminated. For instance deferred work for Davis Lock has not been funded and the long term repairs for the quoins at Jones Falls have not been funded. We also have not seen any action on the Rideau Canal with the new government's promise to restore science and openness to Parks Canada. The site is still not being managed as a UNESCO World Heritage Site.

## How to Fix Parks Canada and the Rideau Canal

Fixing the Rideau Canal could start tomorrow with a change in Parks Canada management and policy. Take half the money and staff time being spent on revenue generation and apply it to heritage and public engagement and the Rideau would be a much (much) better place. Many of the required changes are very low cost items, the main "cost" is a change in attitude from Parks Canada. Clearly the Rideau Canal needs its own senior management, that too could be easily and quickly done. Getting a Rideau Canal management that has a knowledge of heritage, which it currently doesn't have, is tougher and will take longer, but it can be done.

Handing the Rideau Canal over to some other government department is not a solution. The Department of Canadian Heritage has been mentioned, but they are not equipped to manage the Rideau Canal. Despite their name, their mandate relates much more to contemporary Canadian culture than it does to the type of Canadian heritage represented by the Rideau Canal. Parks Canada is still the agency dealing with things such as National Historic Sites and World Heritage Sites. They once did, and can again, manage the Rideau Canal properly.

A proper fix of Parks Canada is not a simple one that can be done in the short term, it will take many years. Simply reversing the 2012 cuts to Parks Canada will do essentially nothing since the heritage skill sets that Parks Canada got rid of at that time cannot be easily or quickly replaced. And even if replaced, the current corporate culture is that of tourism and revenue generation, not natural and cultural heritage. That corporate culture has to be change, their has to be a senior management of Parks Canada that has a belief in its own legislation.

The first thing that has to be done is for Parks Canada to be set back on its legislated course. Its corporate culture has to change to put environment and heritage back where it belongs, as the prime mandates of the agency.

This process has to start with a commitment from the Government of Canada to put Parks Canada back on the right course. While the new Liberal government (fall 2015) promised to restore the effects of the 2012 cuts to Parks Canada, it has yet (fall 2016) to happen. The change has to start at the top, and that's the Government of Canada.

More funding for Parks Canada is clearly needed, but only once the process of putting Parks Canada back on the right path has been started. As noted earlier, the Government has been adding huge new responsibilities to Parks Canada without adding any additional funding. You can't expand the "protected park spaces" by 50% while keeping the operating budget static and have Parks Canada meet its mandate. If the Government of Canada wishes to add more "protected park spaces" and more World Heritage Sites, sufficient funding to properly maintain all these new sites, in addition to properly maintaining all of its existing sites, has to be provided.

It's not a question of affordability, it's a question of budget priorities. Canada can clearly afford to have a dynamic Parks Canada fully meeting its mandate. They have added billions of dollars in new program spending in recent years – the money is available, the political will is not. The government could increase Parks Canada's budget tomorrow, to a level where it can actually meet its mandate, if it so wished.

Parks Canada needs to return to its legislated mandate and be funded at a level where it can actually meet that mandate for all the sites that it manages, including the Rideau Canal.

**MAY 2016 UPDATE:** a May 9, 2016 letter from the Minister of Environment and Climate Change, Catherine McKenna was clearly written by the "old" Parks Canada. I do know that I'm being totally unrealistic in any expectation that a new government can make meaningful change to an entrenched bureaucracy (I'm used to the private sector world where this can and does happen). But I still encourage the government to take a hard look at what Parks Canada is doing today and measure that against its legislated mandates (and what Parks Canada used to stand for – the protection and presentation of our natural and cultural heritage).

**OCTOBER 2016 UPDATE:** The Government of Canada has yet to take any action to put Parks Canada back onto its legislated mandate.

## About the Author

The author, Ken W. Watson, has been living on the Rideau Canal since 1995. Since 1996 he has been operating, [www.rideau-info.com](http://www.rideau-info.com), a very large non-commercial website about the Rideau Canal. He has authored several books about the canal, ranging from heritage books to a paddling guide for the canal. He also volunteers his time and skills with several Rideau heritage organizations.

Ken does all of this as an individual, a concerned Canadian citizen, simply trying to promote and protect important aspects of Canada's rich heritage as best he can.

In 2012, in reaction to the brutal cuts made to the Rideau Canal, and Parks Canada's abandonment of its heritage mandate, he started up a separate issues website, [www.SaveOurRideau.ca](http://www.SaveOurRideau.ca) to document and make the public aware of what Parks Canada and the Government of Canada were doing to ruin the Rideau Canal.

Dealing with these issues is not something he likes to do – he'd much rather be telling people about the wonders and rich history of the Rideau Canal, but it is critical that people speak up in defence of our Canadian heritage. The Rideau Canal is an important part of our Canadian heritage, it's an important part of this region of Ontario and it deserves better from the Government of Canada.

More information about these and other issues can be found on [www.SaveOurRideau.ca](http://www.SaveOurRideau.ca)

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