# **The De-Evolution of Parks Canada** by Ken W. Watson

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 December 2018*)

# **Table of Contents**

Updates
Synopsis1
Government Operation of the Rideau Canal 3
Parks Canada Takes Control 4
The Decline of Heritage Support by Parks Canada5
The Cuts of 2012
The Parks Canada Agency Act
The 2012 National Asset Review
The VEOC
Rideau Canal and Ontario Waterways12
The Public Good
Revenue Generation
Economic Benefits of Rideau Canal Heritage to the Rideau Corridor
Public Access to Information
Public Engagement
Management Plan 22
A UNESCO World Heritage Site
Federal Government Role in the Decline of Parks Canada24
How to Fix Parks Canada and the Rideau Canal
About the Author

# Updates

This is a dynamic document, it will be updated as issues referenced in this document change. A 2016 update just added UPDATE section, a 2018 update changed some of the original text to bring it in line with the state of the Rideau Canal in October 2018.

**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 90% 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).

**October 8, 2018:** Mostly minor updates – in the spring of 2018 (May 8, 2018), the Government (Minister Catherine McKenna) released the Let's Talk Parks Canada which was based on consultations done in January of 2017. From a National Historic Site perspective, the Minister's report included a directive to Parks Canada for "an emphasis on commemorative integrity at national historic sites, together with the need to dedicate additional resources to education and interpretive programs." This sounded like good news, but a reply to a letter I wrote to the Minister in late May, and answered by Ontario Waterways Director, Jewel Cunningham, indicated that Parks Canada would be ignoring the Minister's directive on the Rideau Canal NHS.

In example, as of this October 2018 update, the "new" (April 2017) Parks Canada Rideau Canal website, contains no (zero) heritage information about the Rideau Canal. No history of the canal, no information about the Rideau's NHS and WHS designations, no heritage stories, no public education about the cultural heritage of the Rideau Canal. The public education component of commemorative integrity requires that the reasons for the site's NHS designation be communicated to the public. This is still not being done for the Rideau Canal. In addition, the Rideau Canal office remains without heritage resources (no qualified heritage staff) to develop and implement a robust heritage educational and interpretive program.

December 16, 2018: Small updates, mostly to the management planning section.

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%.

<sup>\*</sup> 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. However, the culture of secrecy continues, in 2017 it took an Access to Information request to obtain an organizational chart for Ontario Waterways since a request for that simple bit of information, which should be in the public domain, was turned down by Parks Canada.

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.

The Liberal government has dramatically increased spending, to over 1.3 billion in 2017-18, but some areas of Parks Canada, such as Heritage Places Promotion and Public Support, have remained with a flat budget. It's not so much the budget, but how they spend it. We've seen no increase in heritage staffing or heritage support in recent years – it continues to be all about revenue generation and visitor numbers (except for boaters – there is very little marketing done that targets boaters to travel the Rideau Canal).

Now in 2018 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. A perfect example of that is their "new" Rideau Canal website, which replaced their old website in April 2017. It was shocking to see that it contained no (zero) information about the history, cultural heritage or heritage designations of the Rideau Canal. That situation continues to this day (October 2018). Information as to why the Rideau Canal is a National Historic Site of Canada, a UNESCO World Heritage Site and a designated Canadian Heritage River is not on the website. There is no history, no cultural heritage information and no stories of the Rideau Canal (a reminder, the Parks Canada charter states "We are storytellers recounting the history of our land and our people - the stories of Canada" – apparently that doesn't apply to the Rideau Canal). The Director of Ontario Waterways stated in 2015 that "revenue generation" is Parks Canada's focus on the Rideau Canal. This remains 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 cooperatively 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 its Chair, Larry Turner, a heritage expert and advocate, started the push to get the Rideau Canal designated as a UNESCO World Heritage Site. This eventually led to the official nomination process done by Parks Canada 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. For example, Jones Falls Lockstation, one of the most spectacular engineering achievements of the Rideau Canal, has never been archaeologically investigated, except for a few, very small (localized) areas in advance of construction projects on the site.

The only exception to the general no archaeology programs, 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. An example is several requests since 2004 (including one in 2017) to archaeological investigate one of the most significant UW sites, the Round Tail Dam, which was missed in the program done by Parks in the early 2000s, have all been turned down.

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 (RCAC), 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. The Rideau Canal Office under Superintendent John Bonser, to his credit, did form the RCAC in 1996, bringing together a varied group from the public to provide an independent public view of various issues faced by Parks Canada on the Rideau Canal. 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. The RCAC was terminated by Parks Canada in 2011.

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 to whittle potential sites down to the required 10 – eventually settling on 11 in 2004. The Rideau Canal, under Superintendent Doug Stewart, 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 but then stopped. See the Management Plan section for details.

**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 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 an Access to Information Request made by the media.

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 a 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.

The VEOC isn't talked about anymore except as an example of public consultation, a May 9, 2016 letter received from the Hon. Catherine McKenna (but written by Parks Canada), cites the 2013

"consultations" about the VEOC and uses the installation of oTENTiks as an example. But its effects linger, primarily the separation of tourism and heritage interpretation that was part of the VEOC. Parks Canada still doesn't appear to understand that heritage presentation and interpretation go hand in hand with tourism on a National Historic Site such as the Rideau Canal. Their current website (no heritage, no stories, no education) is a poster child for this non-understanding on the part of Parks Canada.

## **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. An Access to Information request done in 2017 to get information about this change shows the lack of planning and a clear lack of understanding of heritage canals.

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 quite literally a part time job. The Director, who is based in Peterborough, spends most of her time with Trent-Severn issues and has never had the inclination in almost six 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 he 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 to a degree, except for the fact that it remains a part time job for the Rideau (Associate Director has responsibilities for both the Rideau and Trent-Severn) and many heritage issues are still not being dealt with. As an example of how little attention is paid to the Rideau Canal by Parks Canada, the Associate Director took a 9 month assignment in February 2018 and was not replaced with an acting position on the Rideau Canal. This left no senior management on the Rideau Canal to deal with the many issues facing the canal.

The merger of the Rideau Canal NHS with the Trent-Severn NHS 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. A fundamental tenant of management is

that proximity counts, a manager in the office being managed is far more effective than one located in an office 200 km away.

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 (original tolls for lockage were suspended in 1903 and abolished in 1905). 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 (Business Development Unit, aka BDU) which, on its own, is costing them approximately \$500,000 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, which resulted in replacing 3 tour boats with only 1, 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 though 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.

The Minister's 2017 Lets Talk Parks Canada report provided a directive to make commemorative integrity, which includes heritage landscapes and public education, a priority. It should be given as much resourcing as the BDU, but it remains with essentially no resourcing on the Rideau Canal.

#### 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. In tourism speak, it should be a "destination" for travellers, a place so well known that it deserves a purpose visit. This would not only serve Parks Canada but would be an economic boon to an area that badly needs it.

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 viewscapes 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 remained closed to the public until 2017 when it was re-opened.

In 2007, a "temporary" repair of the lock quoins (large corner monoliths of the locks that support the gates) was done in bright white modern cement, ruining the heritage appearance of the locks. It was supposed to be temporary repair since Parks Canada's Cultural Resource Management (CRM) policies don't allow for this type of modern repair unless it is a "short term repair". That is only allowed under CRM policy if a suitable heritage appropriate long term restoration is planned to be done. The original plan for that was 2010/11, but it was never done. It could have (should have) been part of the \$3 billion dollars in infrastructure funding provided to Parks Canada in 2015 but Ontario Waterways didn't secure the funding from that program to do needed restoration. The monoliths have been deemed to be structural sound (which isn't the issue with them) for another 20 years – so it appears that Parks Canada has abandoned their own CRM policies at Jones Falls.

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). New heritage appropriate railings are now (2018) proposed as a small step in fixing that problem.

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 couldn't even see into the building, the single window had been replaced with a piece of plywood painted to look like a window. That position was restored, on a part-time basis, in 2017.

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. The bridge work got delayed and the bridge was condemned in the latter part of the 2018 season. Replacement, as a pier bridge rather than the original crib bridge design (a potential CRM issue), is scheduled for 2018/19.

Parks Canada has, as of 2018, an internally prepared heritage interpretation plan for Jones Falls. A litmus test for the heritage presentation of this important site is whether Parks Canada will resource any part of that plan.

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. In tourism terms, Jones Falls should be a "destination." – it's entirely in Parks Canada's hands to make this happen. Visitors to Jones Falls 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 this providing a direct economic benefit to the Township of Rideau Lakes (which badly needs it).

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.

# **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 send 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 bureaucratise (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, despite several requests, refused to release it. Then suddenly, in January 2016, they released after a media request. Why the 2 ½ year delay? 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 an Access to 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. An Access to Information request on the other hand is expensive. Parks Canada has to evaluate the request to see if can be released and what information they think should be redacted. 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.

An example of that is an Access to Information request, made in the spring of 2017, for an organizational chart for Ontario Waterways. This request was turned down by Ontario Waterways. Accordingly, an Access to Information request, which shouldn't have been needed, was filed. The antiquated process that Parks Canada uses of doing a poor scan of a printed document resulted in the small text of the organization chart text being unreadable. Parks was informed that their ATI response was unacceptable and they then sent the same scan, simply done darker, still unreadable. Accordingly, a complaint was made to the Office of the Information Commissioner for Canada.

In a conversation with the Office of the Information Commissioner, the first thing was some disbelief on the part of the OIC that it took an ATI request to get an organization chart. "Shouldn't that information be on the Parks Canada website?" Yes, it should be, but Parks Canada has a culture of secrecy (that type of information is still not publicly available). In the end (presumably after being contacted by the OIC), Parks Canada asked what would be acceptable and the reply was "the same type of organization chart you'd put on the desk of CEO Daniel Watson." A marginally better copy was received, although it wasn't the type of clean copy that was expected. In 2016, a Treasury Board directive told departments that ATI responses should be provided "in formats that are modern and easy to use" – a directive that Parks Canada is not following.

Transparency issues continue. A request to receive the Cultural Resource Management (CRM) reviews of the infrastructure work at Jones Falls, made on September 3, 2018 was turned down in late November, forcing the author to do an ATI request to get that information. What Parks Canada does to cultural resources that are deemed to be of "National Significance," which is how the locks at Jones Falls are officially defined, should be publicly available via a simple request by any Canadian.

# **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-amble 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 (except in a static display) 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 is not a dynamic heritage experience. 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. The blacksmith was returned on a part-time basis to Jones Falls in 2017 as was student interpretation of the lockmaster's house.

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. In April 2017, Parks Canada launched a new website for the Rideau Canal (part of a rollout of a new design for all Parks Canada sites). Incredibly there was no history about the Rideau Canal, no information about its National Historic Site designation or its UNESCO World Heritage Site designation, no public education, no stories of the Rideau, no cultural

heritage information. This continues to this writing; the website of a National Historic Site of Canada and a UNESCO World Heritage site has no heritage information it. There has been no explanation for this unbelievable oversight other than "it's not a priority." At the very least, the heritage information that was on the old website could have simply been ported over to the new website. It will likely to take an ATI request to source an explanation for this. It is contrary to Parks Canada's legislation and mandate, and it is certainly contrary to the Minister of Environment & Climate Change's directive in the spring of 2018 to make commemorative integrity a priority – that type of information on their website is a significant part of the public education component of commemorative integrity.

#### 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 and Smiths Falls lockstations). 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. The new plan, which was started in 2016, is now, after a series of missteps, scheduled to be completed by the end of 2019 (see the Management Plan section).

The statement in the 2005 management plan 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 arguably should be done, if they simply did what they said they would do the Rideau Canal would be in a far better state today.

In closing this Public Engagement section, it's worth using a quote from Larry Ostala, the 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

#### **Rideau Canal NHS Management Plan**

Management plans for National Parks and National Historic Sites are a legislated requirement, part of the Parks Canada Agency Act. The legislated requirement is to "provide the Minister with a management plan for that national historic site or other protected heritage area in respect of any matter that the Minister deems appropriate, **including**, **but not limited to**, **commemorative and ecological integrity**, resource protection or visitor use, and that plan shall be tabled in each House of Parliament" (Section 32 of the Parks Canada Agency Act).

The previous section in this document used the 2005 Management Plan as examples of what Parks Canada's management of the Rideau Canal should be (the 2005 plan was very well done). In 2012, with the re-organization of the Rideau Canal management into Ontario Waterways, the 2005 management plan was essentially thrown out the window. That should have triggered the need for a new management plan since when there are fundamental changes to how the site is managed, a new management plan is required. However, since Parks Canada itself makes that determination (there apparently is no oversight), no changes were made, much of the 2005 plan (essentially most of the heritage and public education components) was simply shelved.

The abandonment of major sections of the Rideau Canal Management plan with the 2012 reorganization of heritage canals and a major change in policy direction in how the Rideau Canal is managed, calls into question whether there is any accountability regarding actually following a management plan. Parks Canada has all sorts of guidelines regarding creating a plan since it's a legislated requirement, but apparently nothing in policy that says that Parks Canada has to follow a plan. By all indications, management plans have simply become a pro-forma process, they have to be created, but they don't have followed. A Parks Canada 2017 evaluation of the implementation of the 2005 management plan was both cursory and inaccurate (since it was done by someone not familiar with the details of how Parks Canada had managed the Rideau from 2005 to 2016).

In 2014, Parks Canada made significant changes to how management plans were done, stripping them of details. Then CEO, Alan Latourelle, who was not a fan of detailed management plans, implemented new management plan guidelines using the concept of a "high level" plan. Parks Canada is promoting these as a management plan based strategic objectives focused on results rather than actions Parks Canada will take to achieve the elements listed in a management plan. While from a bureaucratic view this sounds reasonable, the reality is that management plans have been stripped of accountability. There is nothing in the new plans showing how Parks Canada plans to "walk the talk". While there is apparently is no accountability in terms of Parks Canada actually following a management plan, it is still important for Parks Canada to show how they plan to resource and accomplish the objectives set in the new plans.

It's also to be noted that even though a primary purpose of a management plan is to ensure the "commemorative and ecological integrity" of a site (section 32 of the Parks Canada Agency Act), several of the new "high level" plans, including those for the Lachine Canal National Historic Site and Fort Wellington National Historic Site, do not even contain the word "commemorative" in them.

The creation of a new plan for the Rideau Canal has rife with problems. A new plan should have been done in 2010 when the management plan cycle (as legislated in the Parks Canada Agency Act) was five years. We should have had a new plan in 2012 when they changed the organizational structure of the Rideau Canal and dramatically shifted the policy direction of Parks Canada on the Rideau Canal. In 2012, the government of the day changed the Parks Canada Agency Act to have plans done on a 10-year cycle. So, on that cycle, we should have had a new plan completed in 2015, but nothing happened. And now (late 2018), there is still no new plan. The government has set a September 2020 deadline for all plans to be completed and signed off by the Minister. A draft plan for the Rideau is apparently now schedule for the spring of 2019.

One of the reasons that management plans are important is that they provide one of the very few opportunities for the Canadian public to have input regarding how our heritage sites and national parks are managed. While that shouldn't be case, public engagement should be an ongoing process; the simple fact is that it's not happening today. One of the largest changes to the management of the Rideau Canal, the re-organization into the Ontario Waterways unit, was planned by Parks Canada in 2010-11 with absolutely no public consultation. If that dramatic change had triggered a new management plan, as it should have, then public would have had an opportunity to provide their input into the proposed changes. That never happened.

#### 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 kept their 2013 Periodic Report to UNESCO a state secret for two and half years. They submitted the report on July 30, 2013 and didn't release it to the public, despite repeated requests, until it was given to the Ottawa Citizen on January 6, 2016. It was later posted to the UNESCO website. It's puzzling why they did this since there is nothing in the report that would warrant a 2 ½ year holdback (other than their present culture of secrecy). The report itself is very vague, based on a questionnaire supplied by UNESCO. It does little to inform UNESCO of the actual state of WHS management of the Rideau Canal.

For example, in response to protecting the visual values of the canal, they noted they completed a study of that issue. What they didn't mention was that the study (done by a consultant) was badly flawed. Parks was well aware of this, in June 2013 they were given an expert critique of the report, pointing out the many problems with the study including the fact that lockstations aren't included in the visual value assessment and that most of the land use maps in the report have serious errors (the landscape map of Sand Lake for instance is 50% in error – that was fully documented in the critique). The Rideau Corridor Landscape Strategy (which was created to address the protection of the visual values of the Rideau Canal) is essentially dead, Parks has done no serious work with that since 2013.

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 delisted 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.

#### 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 Rempell – 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 Rempell 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 were 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 made a dent in this.

In June 2015, the new Liberal government announced almost 3 billion in infrastructure funding for Parks Canada. Additional funding was also given to increase gate making capacity from 3 to 6 per year. The Rideau Canal only got 57 million dollars of that very large infrastructure funding pie. While it did address much of the deferred work on heritage structures, it didn't address it all. Deferred work for sites such as Davis Lock did not receive any funding and required heritage restoration work for the Jones Falls monoliths was not included in this funding (or any funding).

A Liberal election promise to restore the cuts to Parks Canada done by the Harper Government in 2012 has yet to materialized. On the Rideau those cuts included the elimination of heritage staff (not restored), the removal of two local Parks Canada libraries (not restored) and a shift of emphasis in the management of the site from heritage to revenue generation (not changed).

One of the big problems for the Rideau Canal created by the Liberal government was changing the Department of Environment into the Department of Environment and Climate Change under a single minister. That portfolio really needs two ministers. The current Minister, Catherine McKenna, appears to spend 90% of her time on the very large and important climate change portfolio. Issues such as Parks Canada's management of the Rideau Canal (which goes through her riding), are being ignored. She uses the Rideau Canal for photo ops but has yet to answer (either her or her office) any letter written to her about issues on the Rideau Canal (they all get tossed to Parks Canada for a self-serving answer even when a response from her department is directly requested). From an outsider perspective, the Department of Environment and Climate Change is not doing any oversight of Parks Canada.

One apparently positive thing was the release in early 2018 of the Minister's report on the January 2017 Lets Talk Parks Canada public consultations. In that report the Minister provided a directive for "An emphasis on commemorative integrity at national historic sites, together with the need to dedicate additional resources to education and interpretive programs." To date (Dec. 2018) this has not happened on the Rideau Canal, and there is no indication from Parks Canada management that they intend to comply with the Minister's directive for the Rideau Canal National Historic Site.

On December 3, 2018, Minister McKenna announced (via Twitter) that "Following the largest ever consultation on Parks Canada, a working group of experts in many fields will help us implement one of the recommendation from Lets Talk Parks, Canada, making sure that ecological/commemorative integrity is at the forefront of our decisions. Hopefully this working group, the "Short-Term Independent Working Group on Ecological and Commemorative Integrity at Parks Canada" will come up with recommendations that can make the required changes to the corporate culture of Parks Canada and effect real change in the field, including on the Rideau Canal National Historic 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.

One of Parks Canada's problems that we've seen first hand on the Rideau Canal is that they consider Superintendents to be interchangeable between National Parks and National Historic Sites. In addition to strong management skills, one would think that a requirement to be a field unit supervisor of a National Park would be some background and working knowledge of ecology. Same for the field management of a National Historic Site of Canada, a working knowledge of heritage should be a consideration. There should be a requirement for senior managers to understand ecological and heritage values, to understand what the ecological and commemorative integrity actually means.

Handing the Rideau Canal over to some other government department as was suggested by some in 2012 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 being done at the expense of natural and cultural heritage (rather than in conjunction with). That corporate culture must be changed, there 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 2018) to happen. The change has to start at the top, and that's the Government of Canada. While the Let's Talk Parks Canada report has some good words, none of it has been implemented on the Rideau. Will the working group provide solutions for tangible change?

Parks Canada's overall budget has increased considerable (now in the vicinity of 1.3 billion dollars), but the money it spends on heritage (other than the infrastructure program) has remained flat. None of it has been directed at reversing the effects of the 2012 cuts, which mostly impacted science, ecology and heritage. None of that has been restored. The new infrastructure money is welcome and badly needed (at all Parks Canada sites), but it has done nothing to change the fundamental cuts that were done in 2012, or the cultural shift in Parks Canada that has taken it away from its legislated responsibilities. The Rideau Canal remains a poster child for that problem.

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. Parks Canada now has a robust budget, it's how they allocate that budget that's the main problem. The government could force that change at any time, if it so wished, since no changes in legislation is required. The framework is there, the will apparently is not.

Parks Canada needs to return to its legislated mandate for all the sites that it manages, including the Rideau Canal.

# **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, 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 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

Ken can be contacted through his Rideau email address: rideauken@gmail.com