

Rt. Hon Justin Trudeau  
Prime Minister of Canada  
House of Commons  
Parliament Building  
Ottawa, ON K1A 0A6

April 6, 2021

**Re: Significant Heritage Issues – Rideau Canal World Heritage Site**

Dear Mr. Trudeau:

I am writing to you concerning significant issues regarding Parks Canada's cultural heritage and environmental management of the Rideau Canal National Historic Site and UNESCO World Heritage Site. Parks Canada is not following its legislated mandate on the Rideau Canal under the Parks Canada Agency Act and it is not following the requirements of the World Heritage Convention and UNESCO guidelines for the management of a World Heritage Site. As your office should be aware, UNESCO wrote a letter of concern to the Government of Canada in November 2019 regarding Parks Canada's management of the site, stating "*the management system for the property does not currently provide adequate protection to the OUV [Outstanding Universal Value – the reasons for the site's WHS designation] or the setting thereof.*" This is a black eye for Canada and Parks Canada should never have allowed that to happen. The problem however goes much deeper than Parks Canada's mismanagement of the Rideau Canal as a UNESCO World Heritage Site, I've enclosed my recent submission to Parks Canada which details the many substantive problems, as well as my letter of concern to UNESCO.

The Parks Canada Agency made an extensive management change to the Rideau Canal in 2012, stripping away most of its cultural heritage and environmental resources, concentrating instead on pure tourism and revenue generation. It has, subsequently, ignored Ministerial Directives, including one made by Minister McKenna in 2017 for "An emphasis on commemorative integrity at national historic sites, together with the need to dedicate additional resources to education and interpretive programs." Parks Canada has no education or interpretive programs on the Rideau Canal and the canal is not in a state of commemorative integrity. Parks Canada has simply ignored that directive.

I've also encountered a significant problem with regard to ecological integrity, a requirement embedded in Parks Canada's charter, the Parks Canada Agency Act and Parks Canada's own operational guidelines. In recent discussions regarding a new management plan (now 9 years overdue), they have stated that Parks Canada has no responsibilities to the Ecological Integrity of the Rideau Canal, a large federally owned waterway, consisting of lakes and rivers with significant natural ecosystems, now under threat from inappropriate development and issues related to climate change. I have detailed this issue in my submission to the Parks Canada management plan process included with this letter.

An issue with Parks Canada's management plans, which are tabled by the Minister of Environment and Climate Change in Parliament, is that Parks Canada does not follow their management plans. This is well documented on the Rideau Canal with the abandonment of large sections of their existing (2005) management plan in 2012, with no accountability. In addition, starting in 2008, they began to strip down the

format of their management plans, what they are calling a management now, is not, by anyone's definition outside of Parks Canada, a management plan. It does not meet even the minimum international criteria for a protected site management plan. Parks Canada's management plans are tabled in Parliament. Doing so with this plan for the Rideau Canal will simply be both a national and international embarrassment.

In addition, Parks Canada appears to be presently conducting a pro-forma process with their current public consultations of a new management plan. This goes back to the lack of oversight and external accountability of Parks Canada. Part of the problem may be its agency status, which you (PMO) recently noted in relation to the PHAC, that PHAC "as an Agency, gets to decide, to an extent, their own priorities - those would be internal, bureaucratic decisions ..." That shouldn't be the case, priorities must be legislation based and the Parks Canada Agency Act is quite clear that Parks Canada's priorities are to the commemorative and ecological integrity of the sites it manages. Parks Canada has chosen to ignore those legislated priorities for the Rideau Canal. That was another Ministerial Directive from Minister McKenna, that "commemorative and ecological integrity must be a first priority in decision making". That's not the case on the Rideau Canal, Parks Canada continues to ignore its own legislation and specific ministerial directives.

My submission to Parks Canada regarding a new management plan provides all the details your office needs to understand how deep this problem goes in Parks Canada. They are not the Parks Canada of even 20 years ago, they've devolved to being a pure bureaucratic agency, rather than a protector and presenter of some of Canada's most significant cultural and natural sites. They have a proud history, a history now being badly tarnished by a bureaucracy that has taken a very wrong turn. As a person who loves the outdoors and Canadian heritage, and has visited many Parks Canada sites across all of Canada, this change in Parks Canada is more than disappointing. The Rideau Canal is a classic example of Parks Canada gone bad.

I trust that your office will read my submission to Parks Canada and take this issue seriously. This is not just a UNESCO fire to put out, it's a deep rooted problem in the corporate culture of today's Parks Canada. It is an expectation of the public, certainly myself, that government organizations must follow their legislation. If a significant change is done, such as with Parks Canada in the last 20 years, then it should be legislation based. There are indeed legislative changes needed, such as a requirement for Parks Canada to actually follow their management plans (a loophole in the Act that Parks Canada is exploiting). But otherwise Parks Canada's mandate and legislation are sound, except for the fact that Parks Canada does not abide by those on the Rideau Canal, one of Canada's most significant cultural heritage sites as well as a significant federally owned waterway, with beautiful lakes and rivers, now under threat.

Yours truly,

Ken W. Watson

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Enc. (2) – Letter to Dr. Mechthild Rössler, Director World Heritage Centre

- Submission to Parks Canada Regarding the Rideau Canal Draft Management Plan by Ken W. Watson, March 31, 2021, including (Appendix B), Rideau Canal National Historic Site of Canada and UNESCO World Heritage Site (including Merrickville Blockhouse National Historic Site of Canada) Draft Management Plan, Parks Canada Agency, February 2020.