

Ron Hallman
President and CEO
Parks Canada Agency
30 Victoria Street
Gatineau, QC J8X 0B3

April 6, 2021

Re: Significant Heritage Issues – Rideau Canal World Heritage Site

Dear Mr. Hallman:

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. I have attached a letter written to Prime Minister Trudeau, a Letter of Concern to UNESCO and my submission to the Parks Canada "consultation" process regarding the draft management plan of the Rideau Canal. While I assume you were not complicit in the decision making in 2010-11 to operate our heritage canals as simple recreational waterways, you are in terms of maintaining the unworkable management structure and operational policies for the Rideau Canal that go directly counter to the Parks Canada Agency Act.

I request that you personally read my submission. I have written to you before and received a reply clearly written by Ontario Waterways and simply signed off by you, what I would characterize as a "blow off" letter. That's extremely disappointing from an organization such as Parks Canada. Part of the deep rooted problem with Waterways is that their management does not do public engagement, to the point of refusing to even discuss these important heritage issues. You'll find that issue, and many others detailed in my submission.

I am also deeply concerned that Parks Canada is being less than honest with UNESCO. In a letter to UNESCO dated February 5, 2020, written by Joëlle Montminy, it stated: *"With respect to ICOMOS's recommendations for updated management planning, I am pleased to confirm that Parks Canada is in the process of renewing the Rideau Canal National Historic Site Management Plan (completed in 1996, updated in 2005, and slated for renewal by December 2020)."* Yet the plan you released to the public 10 months later is completely silent regarding those very specific UNESCO requests, in addition to all the other WHS issues that are completely absent from the plan. That's very troubling.

Bottom line however is that Parks Canada is not operating the Rideau Canal as a heritage site, that's simply fact. You have made the deliberate decision not to resource the Rideau Canal to be able to even do it. UNESCO characterizes resourcing as human, financial and intellectual, the Rideau Canal falls badly short on all three. The fact that UNESCO officially rebuked the Government of Canada, stating, in November 2019, that *"the management system for the property **does not** currently provide adequate protection to the OUV or the setting thereof"* is significant, UNESCO had a very good reason to make that statement. Since that time you've done nothing to address UNESCO's concerns.

In terms of human resourcing, Parks Canada's systems are appallingly poor. The Rideau Canal is being part-time managed from the Trent-Severn (Director position) and we've been waiting for over three years now for the permanent appointment of a new Associate Director on the Rideau Canal (Smiths Falls office). You've got good people leaving the Rideau Canal due to a corporate culture that does not value cultural heritage or ecology. The present management structure, one designed in 2010-11 and re-jigged several times, is inefficient and certainly not designed, or even capable of meeting even minimum cultural heritage

requirements. This goes counter to your own policies for National Historic Sites and UNESCO World Heritage Sites. I've detailed some of that in Section 10.0 of my review.

The fact that Parks Canada does not follow its management plans, and has no effective accountability systems to ensure that it does, is another serious issue. We have a very well documented example of that for the Rideau Canal. For instance, in 2012, several significant sections of the 2005 management plan were completely abandoned, Parks Canada has effectively been operating the Rideau Canal without a management plan for the last 9 years. With no effective internal accountability and no external accountability, Parks Canada's management plans have devolved to simply becoming a bureaucratic process to create a plan. We're seeing that right now on the Rideau Canal.

Another items of very serious concern is Parks Canada's stated position that your mandate for the ecological integrity of the sites you manage does not apply to the Rideau Canal, a large federally owned waterway with significant lakes and rivers, all now under threat from inappropriate development and climate change. As I note in my submission, if Parks Canada isn't responsible, then who is? My read of the Parks Canada Agency Act and your own policies clearly shows that Parks Canada is in fact responsible; you've simply abrogated that responsibility on the Rideau Canal. See Section 8.0 of my review for details.

I'm also very worried that Parks Canada is simply conducting a pro-forma process with the new management plan. Parks Canada did hold quite good public consultations on the scoping document in January 2018, yet none of that ended up in the Draft Plan. It is a request of mine and many others that we be able to see and review a Draft 2 of the plan, one that actually includes public input, one that meets all the requirements of the Parks Canada Agency Act and of course one that actually addresses UNESCO WHS issues. This request has been refused. As I note in my Conclusions, Mountain parks for instance did get this two stage process. While I'm not a fan of your self-serving "What We Heard" reports, Mountain parks did get one of those from their initial consultations and have that to be able to measure how effectively they've incorporated public input into the new plan. We got not such "What We Heard" from the January 2018 consultations.

I'll conclude my letter with two requests. One is that you, personally, take the time to read my submission regarding your management of one of Canada's most significant cultural heritage sites. And, secondly, that the public gets to see and be able to officially comment on a draft plan for the Rideau Canal that will be substantively what you submit to the Minister to be tabled in Parliament. The current draft management plan clearly isn't that plan.

Yours truly,

Ken W. Watson

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- Enc. (3) – Letter to Dr. Mechtild Rössler, Director World Heritage Centre
– Letter to Rt. Hon. Justine Trudeau, Prime Minister of Canada
– 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.