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December 5, 2007

The Honourable John Baird
Minister of the Environment
Les Terrasses de la Chaudière
10 Wellington Street, 28th Floor
Gatineau, Quebec
K1A 0H3

Dear Minister Baird:

RE: Request for review of all British Columbia recovery strategies prepared pursuant to the *Species at Risk Act*

We work with the Wilderness Committee to ensure effective implementation of the *Species at Risk Act* (SARA). We write to bring to your attention political interference by the province of British Columbia in the identification of critical habitat in recovery strategies prepared pursuant to the SARA. As you know, if critical habitat is not identified in a recovery strategy, it cannot be protected. Since over 80% of Canada's species at risk are threatened primarily by habitat loss, BC's actions directly jeopardize their survival and recovery.

To explain, since July, 2006 you have approved as meeting the requirements of the SARA sixteen recovery strategies produced in cooperation with the British Columbia government. Fourteen of these recovery strategies, representing recovery planning for thirty-eight species at risk, fail to identify critical habitat. Recently, it came to our attention that the British Columbia government is and has been directing recovery teams to not identify critical habitat as required by the SARA.¹ This direction is set out in Section 2.5 of the attached BC government document, received through a Freedom of Information request.

¹ Section 41 (1)(c) of the SARA states that a recovery strategy must include "an identification of the species' critical habitat, to the extent possible, based on the best available information...."

We have confirmed that this direction is being applied. In four recovery strategies² posted on the SARA Registry, representing recovery planning for twenty-one species at risk, wording from the BC document is reproduced verbatim in place of the identification of critical habitat. That is, even where critical habitat is known, recovery strategies are adopting the wording from the BC directive to claim that critical habitat cannot be identified.

The adoption of these recovery strategies breaches the SARA requirement to identify critical habitat to the extent possible. To ensure that this breach of the SARA is addressed, and given the risk posed to the survival of the affected species, we seek your commitment to immediately review all recovery strategies prepared by the British Columbia government and to their re-release with critical habitat identified.

Sincerely yours,



Devon Page
Staff Lawyer

² Recovery Strategy for Multi-Species at Risk in Garry Oak Woodlands in Canada; Recovery Strategy for Multi-Species at Risk in Maritime Meadows associated with Garry Oak Ecosystems in Canada; Recovery Strategy for Multi-Species at Risk in Vernal Pools and other Ephemeral Wet Areas Associated with Garry Oak Ecosystems in Canada; Recovery Strategy for the Seaside Centipede Lichen (*Heterodermia sitchensis*) in Canada.