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Association of Professional Biology Comments on the *Report of the British Columbia Task Force on Species at Risk*

The Association of Professional Biology (APB) appreciates the opportunity to provide additional feedback to government regarding the BC Species at Risk Task Force. Our original feedback from November 2010 was submitted prior to the release of the Task Force's January 31st, 2011 report and is appended to that report. Ultimately, the key to successful conservation of species at risk is implementation of strategies that are founded in science with objectives understood by everyone involved. Avoiding the creation of new at-risk species must also be a tenet of any policy.

The role of science and economics

The APB considers science to be the spine of any successful conservation strategy and is pleased that the task force identified the role of science in conserving species at risk. We have previously expressed concern about government cutbacks to natural resource research and inventory programs, particularly those that support ecosystem classification. Ecosystems will shift with climate change and, to keep pace, an ecosystem-based approach to species at risk will require a strong commitment to biological research and inventory.

We acknowledge the challenges and practical realities of effectively and efficiently conserving British Columbia's great diversity of species and ecosystems. However, the task force focus on economic viability and its apparent interest in molding species at risk into a manageable cost-benefit is a concern. The APB encourages government to invest the necessary resources now to implement sound and effective "in-the-field" actions for species at risk conservation in concert with crafting policy mechanisms to align processes at all levels of government.

Ecosystem-based approach

The APB supports the task force recommendation for a more ecosystem-based approach to species at risk conservation; our members agree that there are too many species and too few resources to successfully conserve species at risk using single species strategies alone. In addition, we emphasize that connectivity between functioning ecosystems will become increasingly important to maintain biodiversity as human development continues and climate change effects occur. Connectivity needs to be a significant priority in an ecosystem-based approach to species at risk. Our neighbours in Washington State currently focus on ecosystem connectedness, so there may be opportunities for BC to benefit from cooperative, coordinated management of connectivity across the International Boundary.

The task force report also suggested addressing species at risk in batches, a concept that is not well explained in the report but may refer to strategies that conserve groups of species with similar habitat needs (e.g. cavity nesting birds). However, ecosystem or "batched" approaches by themselves will not provide the full range of solutions needed for effective



species at risk conservation. Part of successful conservation will necessarily involve continued consideration and monitoring of some individual species. Species at risk management in BC should therefore maintain flexibility and room for innovation, ecosystem-based or otherwise. We caution against seeking a perfect, singular model for delivery and instead encourage government to focus on justifying and investing sufficient resources, and on building the relationships needed to quickly implement and achieve positive, lasting results.

Transparency, accountability, and public support

The APB appreciates the task force's emphasis on transparency. We consider professional accountability and public transparency particularly relevant to decisions about the listing of species at risk and implementation (or not) of recovery action plans. To help foster public trust and understanding, any practical, economic or social considerations that influence species management or recovery implementation decisions should be openly documented.

Despite the task force emphasis on transparency, some key concepts in the report remain murky. For example, conservation targets are discussed but not defined. As a universal best practice, we encourage government to describe clear and measurable conservation targets for species and ecosystems at risk. Moreover, streamlining of legislation must also be conducted openly, for which the APB recommends a single administrative framework that promotes the implementation *and continual improvement* of legislation for species and ecosystems at risk. Streamlining should focus on eliminating discord between acts, regulation, and policies while preserving the known effective components of each to ensure that species at risk are properly managed.

The APB supports reasonable steps to reduce the complexity and degree of process required to list and recover species at risk. We suggest a professional biologist led approach to developing provincial priorities, including review of the existing Conservation Framework. However, we are concerned that process revision may tend to stall progress on implementation of recovery actions – the only management stage that will ultimately yield meaningful results. Expedient implementation of sound and effective conservation actions should proceed under the existing framework, with adaptive improvements made to the framework while recovery actions progress.

Establishment of an independent accountability body as proposed by the task force is supported by the APB. In addition, we believe that creating a position of Chief Biologist for the province would help enhance transparency, accountability and public trust through mechanisms similar to the stewardship role currently provided by the province's Chief Forester. A Chief Biologist could set reasonable and sustainable conservation targets for habitat supply and distribution on an ecosystem basis that would take into account and help to integrate government and public priorities for biological and other natural resources (e.g. timber supply). We strongly urge government to appoint a Chief Biologist and require the



use of qualified biology professionals in biological resource management¹. We believe such a commitment is timely and central to ensuring that the success of a science-based approach to species at risk management is infused with broad accountability to the public.

Providing opportunities for public involvement and support is necessary to successfully conserve species across this large province. The APB is concerned about the limited number of opportunities for government supported education and public outreach programs about species and ecosystems at risk. Investment in outreach is essential for landowners and other land users to understand their potential impact on species at risk habitats, to persuade them to participate in impact prevention or compensation programs and to teach them how to sustain habitat on private lands. Outreach is a necessary part of developing enhanced public support for any new or revised species at risk framework and should focus on recovery actions that encourage public involvement over public information.

To conclude, we reinforce the key importance of protecting species at risk habitat where it occurs. Our members are familiar with the significant legislative and social difficulties of achieving success in this area, but we encourage government to meet those complexities with the resources required for success. If we fail as a province to produce real and measurable results soon, we will have wasted the significant policy and planning funds spent on this topic to date, and the diversity of species and ecosystems at risk in BC will remain in jeopardy.

The Association of Professional Biology thanks the BC government for its leadership in establishing a task force on conservation of species and ecosystems at risk. This opportunity to comment on the *Report of the British Columbia Task Force on Species at Risk* is appreciated and we welcome further collaboration with government or the task force to refine and implement the province's approach to species at risk management. Our members are all biology professionals and well suited to helping ensure that the province achieves its goals for strategic reliance on science, accountability to the public, and maintenance of biodiversity.

Association of Professional Biology

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¹ The competency, conduct and performance of BC's biology professionals is regulated through the *College of Applied Biology Act*, enacted by the BC government in 2003. Requiring the use of qualified biology professionals in biological resource management is a necessary element of professional reliance, and will help to support sound, effective and scientifically-defensible management decisions. The Association of Professional Biology represents approximately 1,000 Registered Professional Biologists (RPBio) and Registered Biology Technologists (RBTech) employed by industry, government and non-government organizations in all aspects of biology. We help members maintain competence and achieve high professional standards; advance the development and application of sound biological principles in the management and conservation of BC's natural resources; and foster public understanding of impacts of human and other activities on natural resources.