

Review of Parks Canada Sustainable Development Strategy

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**Performance, Audit and Review Group
Parks Canada**

TABLE OF CONTENTS

EXECUTIVE SUMMARY	i
1. INTRODUCTION	1
2. METHODOLOGY	2
3. PROGRESS AGAINST COMMITMENTS	2
Goal 1 Protect and Preserve Canada's Natural Heritage	3
Goal 2: Increase Scientific Understanding of Natural Systems and Human/environment Relationships	9
Goal 3 Protect and Present Canada's Cultural Heritage	11
Goal 4: Present the Parks Canada Mandate, Values and Systems as a Living Example of the Sustainable Use of Canada's Natural and Cultural Heritage	14
Goal 5 Promote Sustainable Development as a Basis of Community Operation	17
Goal 6 Demonstrate Exemplary Environmental Management Throughout Parks Canada Operations	18
4. THE MANAGEMENT FRAMEWORK AND SUPPORTING SYSTEMS	22
5. OVERALL ACHIEVEMENT OF GOALS AND OBJECTIVES	24
5.1 Establishment	24
5.2 Protection	24
5.3 Heritage Presentation	25
5.4 Town Sites	25
5.5 Environmental Management System	25

EXECUTIVE SUMMARY

In preparation for development a new Sustainable Development Strategy, Parks Canada conducted an internal review of its 1997 sustainable development commitments. The review primarily aimed to document progress against the commitments, identify areas of improvement, and secondarily highlight management and implementation issues.

The review concluded that Parks Canada had been successful in meeting its goals and objectives related to the establishment of national parks and the enhancement of the system of national historic sites and that it was on track in its efforts to establish new national marine conservation areas and national parks by 2003-04 given additional resources for expanding the systems. Some progress was documented with regard to putting in place the basic elements required to protect and preserve Canada's natural cultural heritage, and increase scientific understanding of natural systems and human-environment relationships although weaknesses were identified in the capacity to monitor and report on many specific commitments. A number of actions were taken leading to a renewal of Park Canada's heritage presentation programming including the development of national messaging with sustainable development themes. Efforts were also made to influence the travel industry's messaging regarding sustainable tourism and the kinds of experience they offer their customers at national parks. However, Parks Canada was only beginning to develop the capacity to measure whether heritage presentation programming, national messaging and efforts to influence the travel industry were having the desired results.

Some progress was also reported with the development of town site community plans, and a framework for identifying and monitoring environmental impacts of Park communities. However, the full operational implementation of these plans had yet to happen. Similarly, while a framework for identifying and monitoring the environmental aspects of Parks Canada's operations had been developed, implementation of the framework at specific sites was far from complete, a fact noted by the Commissioner of the Environment and Sustainable Development in his May, 2000 Report.

The review also identified a number of challenges with regard to the design and support for the strategy including problems with the logical links between parts of the strategy, and the need to better integrate the strategy into the overall management regime of the Agency including providing clearer accountability for implementing, monitoring and reviewing the SDS as a whole and as well as specific aspects of the SDS. Problems were also identified with diffuse and ambiguous commitments which lacked measurable targets and a lack of internal management information systems for monitoring and reporting on specific activities, outputs, and outcomes. According to the Commission of the Environment and Sustainable Development¹, many of these issues were common to most of the first round of sustainable development strategies in government.

Results of this review will be used in designing the revised Parks Canada sustainable development strategy to be tabled in Parliament by December, 2000.

¹

"Moving Up the Learning Curve. The Second Generation of Sustainable Development Strategies" Commissioner of the Environment and Sustainable Development, December 1999.

Review of Parks Canada Sustainable Development Strategy

1. INTRODUCTION

In 1997 Canadian Heritage published its sustainable development strategy "Sustaining Our Heritage". The strategy included a large number of commitments involving Parks Canada. In April 1999 Parks Canada became a new service agency separate from the Department with a legislative commitment in the Parks Canada Agency Act (1998) to produce its own sustainable development strategy.

With the implementation of the Agency, Parks Canada and Canadian Heritage agreed to divide responsibility for delivery of the commitments in the original strategy. Of the nine goals in the Canadian Heritage SD strategy, Parks Canada accepted responsibility for six as they related directly to the delivery of Parks Canada's mandate or its environmental management system (EMS). In September 1999, in response to a request to all departments from the Commission of the Environment and Sustainable Development (CESD), Parks Canada slightly revised some of the goals, targets and actions to which it was committed.

In preparation for the next round of sustainable development strategies, the Commissioner of the Environment and Sustainable Development has recommended² that all departments and agencies conduct a review of their first sustainable development strategy in order to improve development and management of their second strategy. Specifically, the Commissioner has suggested that the assessments of the first strategy focus on:

- performance against the goals, objectives, and targets set out in the first strategy
- findings from internal audits or self-assessments of sustainable development management processes; and
- changing circumstances, including policy direction legislation, activities, advances in science and technology and stakeholder interests.

The primary focus of this review is on documenting performance against the actions, objectives and goals. However, in attempting to identify and capture this information many issues with the management systems used to implement, monitor and review elements of the plan became apparent. Observations about the management systems are part of the conclusion of the review. It should be noted that at the time of this Review, Parks Canada was undertaking a separate self-assessment of its management capacity to support its SDS as required by the CESD. Results of this management capacity audit were not available at the time of this Review. The third issue the Commissioner identified for assessment, "changing circumstances" will be covered as part of an issue scan prior to the development of a revised SDS.

²

"Moving Up the Learning Curve: The Second Generation of Sustainable Development Strategies"
Commissioner of the Environment and Sustainable Development, December 1999.

2. METHODOLOGY

Progress was assessed relative to the commitments in the 1999 modification of the Parks Canada sustainable development strategy. Information related to progress against specific commitments in the plan was first obtained by reviewing documents, primarily the 1999 State of Protected Heritage Areas Report (SPHA) and the Parks Canada 1999-2000 Annual Report both of which were in draft at the time of the review. Summaries of progress against each action item were provided to representatives of each program area. They were asked to verify, modify and add to the information reported on progress. In some cases, the information submitted was then subject to additional clarification through interviews and written requests for clarification or elaboration.

3. PROGRESS AGAINST COMMITMENTS

In order to facilitate understanding and use of the results of this review, the order in which the goals are presented has been changed slightly to allow similar activities to be grouped together. For example, the order of the second and third goals has been changed and some activities under goal five are reported on in goal two where other similar activities are mentioned. The six goals, in their new order, are as follows

1. Protect and Preserve Canada's Natural Heritage
2. Increase Scientific Understanding of Natural Systems and Human/Environment Relationships
3. Protect and Present Canada's Cultural Heritage
4. Present the Parks Canada Mandate, Values and Systems as a Living Example of the Sustainable Use of Canada's Natural and Cultural Heritage
5. Promote Sustainable Development as a Basis of Community Operation
6. Demonstrate Exemplary Environmental Management Throughout Parks Canada Operations

The following tables show each goal, objective, target and action numbered in sequence. After each commitment a second number appears in brackets representing the number of the commitment in a database of all government SDS commitments maintained by the CESD. This latter number is included to facilitate external reporting on progress.

The right-hand column in the tables below briefly summarizes progress against each action item in the strategy. In some cases, reference is made to more detailed information in the 1997 State of the Parks Report (SOP Report), the 1999 SPHA Report and the Parks Canada 1999-2000 Annual Report. Summaries of observations regarding the management of the SDS and progress against overall objectives and goals are presented at the end of the review.

GOAL 1 PROTECT AND PRESERVE CANADA'S NATURAL HERITAGE (1)**OBJECTIVE 1.1 Preserve Representative Natural Areas of National Significance (1.1.2)**

TARGET	ACTIONS	PROGRESS
1.1.1 Establish three national marine conservation area agreements by 2003-04 (1.2.1)	1.1.1.1 with others, continue studies and negotiations to create marine conservation areas in unrepresented marine natural regions (1.2.1.1)	The proposed Marine Conservation Areas Act to enable the establishment of a system of marine conservation Areas representative of the 29 marine regions of Canada was introduced in the House. (NOTE: after the review was concluded the act died in the House). At the time of the 1997 SDS, five of the 29 natural marine regions were already represented in the system or were the subject of signed federal-provincial agreements: Saguenay-St Lawrence Marine Park in Quebec, Fathom Five in Ontario, Gwaii Haanas of the Queen Charlotte Islands (representing 2 regions) and the marine component of the Pacific Rim National Park Reserve.
1.1.2 Sign two national parks agreements by 1990-00 and three more by 2003-04 (1.2.2)	1.1.2.1 with others, continue studies and negotiations to establish national parks in unrepresented natural regions (1.2.1.2)	Since 1997 work has focused on establishment on NMCA in four regions. One of these at Bonavista-Notre Dame Bays (Newfoundland) was discontinued at the feasibility study stage in March 1999 due to perceived conflicts with other resource uses for the area. Details on progress in the three other areas can be found in the 1999-2000 Parks Canada Annual Report. Parks Canada still expects to meet the target of three new marine conservation areas by March 2004.
1.1.3 Maintain the lead role in the Canadian Heritage Rivers (CHRS) Program (1.1.2)	1.1.3.1 continue to provide assistance for studies leading to the nomination and designation of Canadian Heritage Rivers (1.1.2.1) 1.1.3.2 provide national leadership through support of the goals and actions of the CHRS 10-year strategic plan (1.1.2.2) 1.1.3.3 raise awareness of the Canadian Heritage Rivers System (nationally and internationally), continue to provide secretariat support for the Canadian Heritage Rivers Board (1.1.2.3)	In 1998 Tuktut Nogait National Park was established and Auyuittuq and Quttinirpaaq park reserves were made full-fledged National Parks. As of March 2000 there is a total of 39 national parks representing 25 (64%) of the 39 natural regions in Canada. Progress on parks establishment in unrepresented regions is reported in the 1999 SPHA Report. Parks Canada expects to meet the target of five additional agreements by March 2004 given additional funds to complete the system of national parks.

OBJECTIVE 1.2 Maintain Integrity of National Park Ecosystems (1.1)		
TARGET	ACTIONS	PROGRESS
1.2.1 Protect representative examples of Canada's ecosystems (1.1.5)	<p>1.2.1.1 permit ecological processes to occur (1.1.5.2)</p>	<p>Parks Canada's major initiative in this area has been the institution of prescribed burns in National Parks (1999 SPHA, p.24). There are two categories of prescribed fires a) management-ignited and b) natural ignition. A benchmark of 63,000 ha of yearly burn across the Parks Canada system has been set. This target was reached for the first time in 1999.</p> <p>Individual parks also undertake initiatives to restore and maintain ecological processes (e.g., dam removal, control of exotic species or reintroduction of indigenous species, restoration of land) as per their Park Management Plans. These activities are not systematically inventoried or monitored at national office.</p>
	<p>1.2.1.2 undertake an environmental impact analysis of policies to determine impact on ecosystems (1.1.5.3)</p>	<p>Parks Canada traditionally conducts EIAs of projects. As well it conducts EIAs of policies, plans and programs. The former type of EIAs are by far the most common. Between the 1997/98 and 1999/00 fiscal years, Parks Canada undertook 3052 environmental assessments of projects under the CEPA regulations. It is estimated, based on a 1999 Audit of EIA process in Parks Canada, that an additional 700 to 1300 project specific EIA have been done outside CEAA over the last three years.</p> <p>Based on preliminary data from 1999/00 it is estimated that the Agency conducts 25 to 35 strategic environmental assessments of policies programs and plans each year. This will be tracked more systematically starting in 2000-2001.</p>

OBJECTIVE 1.2 Maintain Integrity of National Park Ecosystems (1.1)		
TARGET	ACTIONS	PROGRESS
	<p>1.2.1.3 Co-operate with other agencies to acquire knowledge of ecosystem components in regions around national parks (1.1.5.1)</p> <p>1.2.1.4 With farmers/ranchers reduce conflicts with wildlife, chemical residues and maintain wildlife habitat outside parks (1.1.5.4)</p> <p>1.2.1.5 With industry, maintain habitats, protect vulnerable species, reduce pollution, and deter entry of exotic species into parks (1.1.5.5)</p>	<p>Parks routinely work with stakeholders surrounding a park in issue related to eco-system integrity. Examples include participation in the model forest program (i.e., Jasper, Fundy) which provides Parks Canada with a voice in local eco-system development and land use and in the UN Biosphere reserve program (see activity 1.2.4.1). At the time of this Review, a more extensive inventory of work with a variety of partners was being compiled as part of the response to <i>The Panel Report on the Ecological Integrity of Canada's National Parks</i>.</p>
	<p>1.2.2 Maintain viable populations of native species 1.1.3</p>	<p>Majority of parks have active species and habitat management programs. The number of native plant and animal species in national parks is tracked and reported in the 1999SPHA Report. Parks have tended to contain a major of their original species although extirpations and exotics are recorded for most parks (see 1999 SPHA Report, p.18).</p>
	<p>1.2.2.1 Acquire and maintain integrated databases for all national parks (1.1.3.1)</p>	

OBJECTIVE 1.2 Maintain Integrity of National Park Ecosystems (1.1)		
TARGET	ACTIONS	PROGRESS
	1.2.2.2 continue to develop an ecosystem-based management approach (1.1.3.2)	<p>Parks Canada's approach to ecosystem management is based on the concept of ecological integrity and is broader than a focus on populations of native species.</p> <p>Each Park is expected to incorporate ecological integrity concerns into its management plan. A new guide for doing this is being prepared in as part of the response to concerns raised by the EI Panel. This may take to form of a separate ecological Integrity Statement (EIS) documenting the current state of its ecosystem or may be incorporated throughout the plan. A park management plan sets out the long-term goals and strategies for achieving ecological integrity in national parks. At the time of this review, there were seven national parks with approved EISs prior to 1999-2000. One additional EIS, for La Maurice National Park, was approved in 1999-2000. Twenty two national parks have draft EISs so that in total 30 of the 39 national parks (77%) have a completed or draft EIS. Six EISs are in preparation for the 2000-2001 fiscal year.</p>
		<p>All national parks are required, by law, to have a management plan which sets out actions for maintaining and restoring the ecological integrity of a park. At the time of this review, thirty of the national parks have approved management plans although many of these were out of date (i.e., had not been updated within the last five years as required by the legislation).</p>
		<p>Parks Canada has also developed a framework for reporting on the elements of ecological integrity (i.e., see 1997 SOP and 1999 SPHA Reports). Baseline information has been reported for some elements of the framework.</p>
1.2.3 Make full use of partners and the public for bio-diversity protection (1.1.4)	1.2.3.1 with the provinces and regional groups make local residents aware of environmental issues in the park (1.1.4.1)	<p>Park management planning engages local and regional stakeholders in extensive consultations on the future direction of each park including its ecological integrity goals. In addition, all Parks promote the concept of ecological integrity but until 2000 there has been no consistent set of core national messages for EI and no formal monitoring of what is communicated at the field unit level. National messages where developed in 2000 (see goal 4). There is no plan to monitor use of these at the local level. Note also that Parks works with six communities in national parks to set direction with respect to community impacts on the environment (see goal 5, on townsites).</p>

OBJECTIVE 1.2 Maintain Integrity of National Park Ecosystems (1.1)		
TARGET	ACTIONS	PROGRESS
1.2.4 Provide leadership in the co-operative stewardship of heritage (1.1.6)	<p>1.2.4.1 strengthen the Canadian Biosphere Reserves Program / Continue to support those biosphere reserves that encompass national parks (1.1.6.1)</p> <p>1.2.4.2 support sustainable development projects of biosphere reserves that encompass national parks (5.2.1.3).</p>	<p>Participation in the Biosphere reserve program allows Parks Canada to have a voice in land use decisions that affect the regions around national parks. Parks Canada provides the secretariat for the Canadian Biospheres Association. Waterton Lakes and Riding Mountain National Parks were part of the Biosphere Reserve Program prior to the development of the Parks Canada SDS in 1997. Since then, the Clayoquot Sound Biosphere Reserve, including Pacific Rim N.P., was designated by UNESCO in Jan. 2000. Currently, Parks Canada is supporting community based initiatives to develop new biosphere reserves which, if successful, will incorporate four other national parks: Kejimkujik, Prince Edward Island, St Laurence Islands, and Georgian Bay Islands National Parks.</p>
1.2.5 Ensure that parks, marine conservation areas and historic sites become part of regional sustainable development strategies. (5.2.1)	<p>1.2.5.1 in working toward the establishment of national marine conservation areas, support sustainable development of fisheries-dependent regions 5.2.1.1</p> <p>Note this target and associated actions originally appeared as part of goal 5 under the objective of “Participation in regional sustainable development efforts”. Since the targets and actions are closely aligned with other commitments to consult and cooperate on research and management of ecosystems (see 1.2.1; 1.2.3) they were moved here. The target refers to all three national systems but actions focus on NMCA or parks.</p>	<p>See 1.1.1 for progress on establishment of NMCA.</p> <p>The proposed <i>Marine Conservation Areas Act</i> (Bill C-8) set out as part of its basic principles for management of NMCA's the commitment that Parks Canada will work with federal and provincial agencies responsible for fisheries management and with users of renewable marine resources to achieve ecologically sustainable use of the areas, while simultaneously setting aside zones that afford full protection to special features and fragile ecosystems. (Note, the Act died with the federal election call in Oct. 2000)</p> <p>The primary consideration of an NMCA is to ensure ecologically sustainable use. At present there is no NMCA equivalent to the ecological integrity statement developed for national parks and no reporting framework like the one for ecological integrity in national parks. Preliminary work on a framework for assessing the integrity of one national marine conservation area was reported in the 1997 State of the Parks Report but the small size of the NMCA system (two operating sites), resource constraints and the continued absence of a legislated requirement for reporting have limited further progress. The proposed <i>Marine Conservation Areas Act</i> included a proposal requiring biennial state of marine conservation areas reporting.</p>

OBJECTIVE 1.2 Maintain Integrity of National Park Ecosystems (1.1)			
TARGET	ACTIONS	PROGRESS	
	1.2.5.2 introduce sustainable development concepts into regional development discussions with other organizations (5.2.1.2)	(See also 1.2.3.1) An ecosystem approach to national parks management was first articulated in the 1994 Parks Canada Policies and Procedures Guide. The approach is a cornerstone of sustainable establishment and management of national parks. National parks also promote the idea of ecological integrity and its importance for the Parks and the surrounding eco-system when participating in other jurisdictions' land use planning exercises. An inventory of park specific ecosystem initiatives was being compiled at the time of this review in response to <i>The Panel Report on Ecological Integrity of National Parks in Canada</i> .	National messages related to Parks Canada's mandate including ecological integrity were developed in 2000.
1.2.6	1.2.6.1 Assess cumulative environmental effects of activities, services, and facilities to minimize ecosystem disturbance (1.1.1.1). 1.2.6.2 Co-operate with other federal departments to reduce pressures of human activities on park eco-systems (1.1.1.2) 1.2.6.3 Continue to educate visitor on impacts/identify and encourage appropriate visitor activities, services and facilities (1.1.1.3) 1.2.6.4 Ensure that each park management plan minimizes visitor impacts (1.1.1.4)	Parks Canada conducts environmental impact assessments (see 1.2.1.2 for details) at the local level to documents effects. By April, 2000, generic models for the environmental assessment of commercial outdoor recreational activities and services in national parks were completed as required by amendments in 1999 to the CEAA Appropriate activities, services and facilities are identified in park and site management plans as they are being developed or revised. Park management works with other stakeholders to reduce pressures of human activities on park ecosystems. Examples include model forest programs in Jasper and Fundy, and the Task Force Report on Bow Valley and subsequent Banff Management Plan. The Guide to Management Planning has been revised (2000) to provide specific direction on appropriate activities, services and facilities. A companion guide on the environmental assessment of management plans has been developed (June 2000) as well, with a focus on the assessment of cumulative effects. Parks Canada has also developed tools (e.g., 1997 A Spectrum of Appropriate National Park Opportunities Photo Matrix; a 1999 Handbook) to improve the consistency in the provision of appropriate activities, services and facilities in each national park. In addition, a Status Report on Human Use Management Studies in Parks Canada, was completed in December, 1999 and identifies an extensive range of studies underway or recently completed, many of which are focused on impacts of human use.	8

GOAL 2: INCREASE SCIENTIFIC UNDERSTANDING OF NATURAL SYSTEMS AND HUMAN/ENVIRONMENT RELATIONSHIPS (3)

OBJECTIVE 2.1 Make Parks Canada expertise available to scientific research (3.1)

TARGET	ACTIONS	PROGRESS
2.1.1 Help identify and communicate the full range of benefits of protected areas (3.1.1)	2.1.1.1 apply whole-cost accounting in assessment of the benefits of national parks (3.1.1.1) 2.1.2.1 continue to participate in local / regional planning and EIAs of activities adjacent to Parks Canada locations (3.1.2.1)	As member of Federal Provincial Parks Council (FPPC), Parks Canada is participating in assessments of ecological economic benefits of parks and other protected areas. However, the specific commitment to apply whole-cost accounting to assess the benefits of national parks has not been carried out and given current resource constraints Parks Canada does not intend to pursue this action at this time.
2.1.2 Participate in broad ecological studies and human/environment relationship studies (3.1.2)	2.1.2.2 participate in Ecological Monitoring and Assessment Network (EMAN) (3.1.2.2) 2.1.2.3 study impacts of human use on ecological integrity (3.1.2.3) 2.1.2.4 study impact of atmospheric stressors upon ecosystems (3.1.2.4)	Field units participate in local and regional environmental assessment activities. A partial inventory of this work has been developed. A total of 16 national parks (Fathom Five, Auyittuuq, Bruce Peninsula, Quttinirpaaq, Elk Island, Fundy, Kejimkujik, Kouchibouguac, La Mauricie, Sirmilik, Prince Albert, Pukaskwa, Riding Mountain, Terra Nova, Waterton Lakes, and Yoho National Parks) participate in EMAN. This program provides permanent sample plots within the park for use by the scientific community for tracking ecological process overtime and for comparing processes in the Parks with the surrounding eco-system. (see 1.2.7) for human use. The 1999 SPHA Report documents the effects of atmospheric stressors on national parks including specific concerns in particular parks and data on acidification at specific parks research has been completed on a screening level assessment of climate change impacts and adaptation options for national parks. In 2000 Parks collaborated with researchers at Environment Canada and the University of Waterloo to produce a screening level assessment of the impacts of climate change in Canada's system of national parks and national park reserves.

OBJECTIVE 2.2 Use Parks Canada Areas and Facilities in Support of Scientific Research on Ecology, Biodiversity and the Environment (3.2)	
TARGET	ACTIONS
2.2.1 Support biological and bio-diversity research and environmental monitoring (3.3.1)	<p>2.2.1.1 facilitate research on ecosystems and bio-diversity by Parks Canada and its partners / facilitate the establishment and functioning of environmental monitoring stations (3.2.1.1)</p> <p>Parks Canada is also a member of several groups studying regional environmental issues (e.g., the Northeast Regional Air Quality Committee).</p> <p>See also the 2.1.2.2 on parks Canada's participation in the environmental monitoring and assessment network (EMAN).</p>

GOAL 3 PROTECT AND PRESENT CANADA'S CULTURAL HERITAGE (2)

OBJECTIVE 3.1 Protect and Present Special Places of National Historic Significance (2.1)

TARGET	ACTIONS	PROGRESS
3.1.1 Enhance the system of national historic sites by the year 2000 (2.1.1)	3.1.1.1 implement the National Historic Sites System Plan by representing 15 under represented themes for enhanced commemoration (2.1.1.1)	<p>(NOTE: the new National Historic Sites System Plan was tabled in October 2000 after the completion of this review).</p> <p>Since 1997, a revised system plan for national historic sites has been developed. The system plan includes a focus on representing people and events as well as sites as part of the system of designations of Canadian history. The plan identifies three strategic priorities for commemoration; Aboriginal history, ethnocultural communities' history, and women's history. The fifteen themes identified in 1997 are no longer used in system planning.</p> <p>The system of national designations of historic sites, persons and events have grown from 1662 in March 1997 to 1754 as of March 2000 an increase of 92 designations (i.e., 47 sites, 26 persons and 23 events). Thirty-nine percent of the new designations (n=36) represent one or more of the program's strategic priorities (i.e., 6 aboriginal history, 10 ethnocultural history, 20 women's history).</p>
3.1.2 Ensure the commemorative integrity of national historic sites / Maintain and improve the condition of cultural resources (2.1.2.1)	3.1.2.1 assess the commemorative integrity of national historic sites / Maintain and improve the condition of cultural resources (2.1.2.1)	<p>In the 1999 SPHA report the commemorative integrity of twelve national historic sites is reported. Eight of these are progress reports on the sites assessed in 1997. Each site receives an overall rating on its resource condition, effectiveness of communication and selected management practices. Overall improvement was noted at most sites since 1997.</p> <p>Information relative to one aspect of commemorative integrity (i.e., resource condition for built cultural assets) is available for all sites. Comparisons of resource condition between 1997 and 1999 shows an overall deterioration of the resource between 1997 and 1999 (See Parks Canada Agency Annual Report 1999-2000).</p>

OBJECTIVE 3.1 Protect and Present Special Places of National Historic Significance (2.1)		
TARGET	ACTIONS	PROGRESS
	3.1.2.2 complete all Commemorative Integrity Statements, scoping documents and management plans for national historic sites (2.1.2.2)	<p>Prior to Parks Canada's first SDS commitments, 9 commemorative integrity statements had been completed. By March 1999, this number had risen to 45 CISs for the 145 Parks Canada administered sites. During 1999-2000, 24 additional CISs were approved and another 15 were in draft form. In total, 58% of the Parks Canada administered sites have approved or drafted CISs. Parks Canada's goal is to complete all CISs for the sites it administers by 2002-2003.</p> <p>Among the family of national historic sites not administered by Parks Canada, 18 had approved CISs prior to the 1999-2000. During the year, 15 more received approval of their CIS. An additional 21 CIS for non-Parks Canada sites were in the draft stage bringing the total number with approved or drafted CISs for the non-Parks Canada administered sites to 54.</p>
	3.1.2.2 monitor the effectiveness of communicating the reasons why each national historic site is nationally significant (2.1.2.3)	<p>The requirement for a management plan for each national historic site administered by Parks Canada was introduced in the Parks Canada Agency Act (1998). In 1997, nine sites had management plans which meet current requirements for ensuring commemorative integrity. Since then, 22 plans have been completed in draft stage, and an additional 61 are scheduled to be complete by 2002. One management plan, for Batoche National Historic Site, was approved by the Minister in 1999-2000.</p> <p>The effectiveness of communicating the national significance of site is one aspect of commemorative integrity. It is measured in three ways: 1) the level of use of the programs, publications or display media; 2) the level of audience satisfaction; and 3) the level of understanding of the intended message. Results of this assessment have been reported for twelve sites in the 1999 SPHA. Parks Canada is committed to reviewing the CI of all sites it administers over the next 10 years (i.e., about 15 sites a year).</p> <p>Parks Canada will begin to collect information relevant to communication effectiveness in the 2000 summer season through its revised standardized visitor satisfaction survey program.</p>

OBJECTIVE 3.1 Protect and Present Special Places of National Historic Significance (2.1)		
TARGET	ACTIONS	PROGRESS
	3.1.2.4 undertake an environmental impact analysis of policies to determine the impact on commemoration of national historic sites (2.1.2.4)	The intent of action is not clear and Parks Canada will not be pursuing this commitment.

OBJECTIVE 3.2 Provide Leadership in the Stewardship of Cultural Resources		
TARGET	ACTIONS	PROGRESS
3.2.1 Maintain involvement with national and international cultural heritage organizations 2.2.1	3.2.1.1 carry out and report on activities with national and international cultural heritage organizations (2.2.1.1)	Parks Canada contributes to international heritage conservation through its leadership and participation in international conventions, programs, agencies and agreements including participation in three major international organizations relevant to its mandate (IUCN, the World Heritage Convention and ICCROM). Parks Canada is also involved in several bilateral and multilateral initiatives. For example, pursuant to a May 1998 cooperation agreement with the United States National Park Service, annual meetings are held involving heads of agencies to review activities carried out under the 1988 memorandum of understanding and to identify new priority areas for cooperation.

GOAL 4: PRESENT THE PARKS CANADA MANDATE, VALUES AND SYSTEMS AS A LIVING EXAMPLE OF THE SUSTAINABLE USE OF CANADA'S NATURAL AND CULTURAL HERITAGE. (4)

OBJECTIVE 4.1 Increase Canadians' Awareness and Understanding of the Value of the Systems of National Parks, National Historic Sites, Historic Canals and National Marine Conservation Areas and of What Is Required to Ensure Their Sustainable Use.

TARGET	ACTIONS	PROGRESS
4.1.1 Increased awareness by Canadians, visitors and outreach clients, of the Canadian systems' value and issues linked to sustainable use by 2002	4.1.1.1 use Parks Canada messages by Dec. 2000.	Parks Canada developed a comprehensive message toolkit outlining Parks Canada's mission, values, programs and services for use in all communications in order to project a consistent image of what Parks Canada does and support the sustainable use of Canada's natural and cultural heritage. The message kit was distributed in May 2000. No information was available at the time of this review on the level of use of the messages.
4.1.2 Increased understanding by Canadians, visitors and outreach clients, of the Canadian systems' value and issues linked to sustainable use by 2002.	4.2.1.1 improve onsite public education programming by tightening messaging and redeveloping or replacing aging media and programming	<p>A process of renewal of Parks Canada's public education programming began with a third party review of heritage presentation in 1997. This led Parks Canada to begin preparation of the <i>Action Plan for the Renewal of Heritage Presentation</i> which was completed in summer 1999. The Plan proposes 30 specific actions for renewal of the function, 20 of which have been acted on in some significant way in 1999-2000. These include:</p> <ol style="list-style-type: none"> 1. Approval of a "Statement of Purpose for Interpretation and Outreach" (see 1999 SPHA, p. 68). 2. Completion, in Winter 1998, of an inventory of Parks Canada's assets including its heritage presentation assets. The inventory was updated in the fall of 1999. 3. Delivery, in Winter 2000, of three professional development workshops related to job competencies, presentation of aboriginal heritage, and on-line outreach education reaching 137 staff 3. Completion, in Winter 2000, of a review of job classifications for front line interpreters resulting in defining 5 core heritage presentation jobs across the system. 3. Development of a tool, for distribution in May 2000, to help identify a national parks key values which form the basis for key public education messages. 4. Creation, winter 2000, of a senior level Heritage Presentation Strategic Direction Committee, tasked with enhancing heritage communication and identifying priorities. The committee's agenda is tied to implementing the action plan.

OBJECTIVE 4.1 Increase Canadians' Awareness and Understanding of the Value of the Systems of National Parks, National Historic Sites, Historic Canals and National Marine Conservation Areas and of What is Required to Ensure Their Sustainable Use.

TARGET	ACTIONS	PROGRESS
	<p>Staff Training</p> <p>As noted 4.2.1.1 Parks Canada held professional development workshops in March 2000, which focused on skill building related to outreach (i.e., training in on-line education and, improved interpretation of Aboriginal heritage).</p> <p>Outreach Initiatives</p> <p>The 1999 SPHA Report provides several examples of outreach including video conferencing with school children to provide virtual visits to a NHS; Edukits distributed to British Columbian school children; an section of the Parks Canada Web Site devoted to Educational Resources; the Great Canadian Parks and the History Lands/History Max TV series. In addition, in the fall 1999 national parks became a part of the Ontario grade 9 geography curriculum with a potential reach of 200,000 students per year. Finally, Parks Canada's Montreal field unit will launch in summer 2000, a "Young Reporters" program to hire young people from ethno-cultural minority communities (9 in the first year) who will spend 10 weeks during summer 2000 getting to know Parks Canada first hand. They will then report back to their communities on what they have learned. Parks Canada also has a program of traveling exhibits promoting aspects of national historic sites, four of which were on tour in 1999-2000.</p>	<p>Website</p> <p>Parks Canada also operates a website which received more than 2,240,000 visits in 1999/00 doubling the visits in 1998-1999. The website features "Virtual Tours" of 120 national parks and national historic sites in Canada including some national historic sites not administered by Parks Canada. The website also features two youth-oriented projects <i>Images of Parks Canada</i>, and <i>Commemorating Canada's History</i> which received 10,916 visits in 1999-2000. During the year Parks Canada also piloted an Educational Resources section which will assist teachers in planning educational visits to national parks and national historic sites.</p>

OBJECTIVE 4.1 Increase Canadians' Awareness and Understanding of the Value of the Systems of National Parks, National Historic Sites, Historic Canals and National Marine Conservation Areas and of What is Required to Ensure Their Sustainable Use.

TARGET	ACTIONS	PROGRESS
	<p>4.2.1.3 develop educational programs in national parks and national historic sites which help the public more fully understand the “why’s” and “how’s” of protecting heritage resources and places.</p>	<p>Communication of the significance of national historic sites is part of the concept of commemorative integrity. Tools for defining these values and communicating them to the public have been developed. The success in communicating these messages has been measured at 12 of 145 sites (See item 3.1.2.3).</p> <p>National Parks are only just beginning to define core values of each Park and design simple public education campaigns around these values (See item 4.2.1.1).</p>
	<p>4.2.1.4 promote the sustainable use of these heritage places in dealings with the tourism industry and business partners</p>	<p>In October 1999 Parks Canada completed and launched an Edukits which is part of its cooperative program with the Canadian Academy of Travel and Tourism. In schools that subscribe to the Academy, students learn about tourism and have an opportunity to do work terms in the tourism industry including with Parks Canada.</p> <p>At the same time, the curriculum also has elements devoted to the protection and sustainable use of national parks and national historic sites.</p> <p>The development of the comprehensive message toolkit outlining Parks Canada's mission, values, programs and services is designed, in part, to support the sustainable use of Canada's natural and cultural heritage. The message kit was available for distribution in May 2000.</p>

GOAL 5 PROMOTE SUSTAINABLE DEVELOPMENT AS A BASIS OF COMMUNITY OPERATION (5)**OBJECTIVE 5.1 Achieve Model Sustainable Communities Within National Parks**

TARGET	ACTIONS	PROGRESS
5.1.1 Use national park communities as national or regional examples of sustainable communities (5.1.1)	<p>5.1.1.1 apply the principle of no net negative environmental impact to park communities, ensuring maintenance of ecological integrity (5.1.1.1)</p> <p>5.1.1.2 use the park management planning process to encourage the inclusion of SD principles in community plans (5.1.1.2).</p> <p>5.1.1.3 with townsite and park advisory committees develop SDSs for the seven national park communities (5.1.1.3)</p>	<p>There are seven communities in National Parks which require community plans. All the plans include reference to SD principles such as limits to growth and growth management, no net negative environmental impact (ecosystem management), standards for appropriate development and business activity and social and economic health.</p> <p>One community plan, for Field in Yoho NP, has been approved (July 1999). The other plans, with the exception of Jasper's have been prepared and are being reviewed by the senior management. Jasper's community plan is still in the consultation phase with community representatives.</p> <p>(NOTE: three community plans were approved in October 2000, after this review was completed).</p> <p>Following the development and approval of a community plan, each community will develop a no net negative environmental impact framework. A definition and description of the principle of NNNEI was developed by a working group of Parks and community representatives in January, 2000. The framework identifies means to reduce pollution (e.g. improved sewage treatment, less solid waste, appropriate waste disposal) and the consumption of resources (e.g. energy and water) and provides the means to ensure that limited future development is carried out in a way that leaves the environment no worse off. The NNNEI framework is expected to be implemented one year after the approval of a community plan.</p> <p>Parks Canada is developing a template to monitor environmental impact and to establish baseline information for 2000-2001. Annual reporting on progress towards implementing the community plans will begin once they are approved.</p>

GOAL 6 DEMONSTRATE EXEMPLARY ENVIRONMENTAL MANAGEMENT THROUGHOUT PARKS CANADA OPERATIONS (10)

OBJECTIVE 6.1 Minimize waste of resources and materials (10.2)

TARGET	ACTIONS	PROGRESS
6.1.1 Contribute to the federal government commitment on solid waste by minimizing the amount of solid waste going to landfill (10.2.1)	6.1.1.1 implement green procurement, composting, recycling and re-use programs that have proven effectiveness in reducing the amount of solid waste generated (10.2.1.2)	Members of the EMS network have been provided training on green procurement (n=50) and lists of environmentally friendly products. Local purchase decisions are still driven by cost considerations given this knowledge of green alternatives

OBJECTIVE 6.2 Reduce and prevent pollution from facilities and lands (10.3)

TARGET	ACTIONS	PROGRESS
6.2.1 Complete the National Integrated Pest Management directive by March, 1998 (10.3.1)	6.2.1.1 implement the national Integrated Pest Management directive (10.3.1.1)	The Pest Management Directive was approved in Jan/Feb. 1999. It requires a plan for all applications of scheduled pesticides. At the time of this review, IPM Plans for application year 2000/2001 were still being submitted to National Office

OBJECTIVE 6.2 Reduce and prevent pollution from facilities and lands (10.3)		
TARGET	ACTIONS	PROGRESS
6.2.2 Comply with the <i>Canadian Environmental Protection Act</i> (CEPA) and guidelines to prevent the contamination of the environment from fuel or oils (10.3.2)	6.2.2.1 register storage tanks / upgrade non-compliant storage tanks (10.3.2.1)	As of April 1, 2000 Parks has 264 underground tanks (UST) and 143 aboveground tanks (AST) of more than 4000 liters. Of these, 94 UST and 86 AST are not compliant.
6.2.3 Eliminate PCB materials from all Parks Canada operations and facilities by Dec. 2000 (10.3.3)	6.2.3.1 phase out PCB-containing equipment, then store and dispose of as per the federal government commitment (10.3.3.1)	In 1997, it was reported that Parks Canada sites were free of PCBs with the exceptions of some locations in 8 field units or service centers. It should also be noted that this report only covered Parks Canada equipment. Equipment owned by others (i.e., hydro companies, buildings occupied by Parks personnel) may contain PCBs. At the time of this Review, the status of the PCBs at these eight sites was not tracked nationally.
6.2.4 Ensure that all facilities releasing waste water conform to CCME guidelines on effluent quality and waste water treatment (10.3.4)	6.2.4.1 monitor effluent quality and upgrade facilities if necessary (10.3.4.1)	A project to assess scope and scale of national sanitary-water issues and determine how far PC is from meeting environmental legislation was planned. However, it was proposed during the review due to other field unit priorities. No date for when the project will be undertaken had been set at the time of this Review.

OBJECTIVE 6.2 Reduce and prevent pollution from facilities and lands (10.3)		TARGET	ACTIONS	PROGRESS
6.2.5	Implement the federal draft policy on contaminated sites management (10.3.5)	6.2.5.1 classify according to risk and prepare action plans for all contaminated sites within a year after identification (10.3.5.1)		The status of in 1997 and 2000 is as follows: # of actual/potential contaminated sites No further assessment required - low risk Requires Phase II, and possible remediation Contamination confirmed (Phase II compl.) Remediation/risk mgt. in progress Remediation completed Risk mgt. in place & monitoring in progress
		6.2.5.2 complete a national inventory of known or suspected contaminated sites by the end of March, 1998 (10.3.5.2)		The number of sites is growing as the inventory becomes more complete. At the time of the Review 37 of the phase 11 assessments were underway. Parks Canada was seeking additional funds to complete the other assessments.
6.2.6	Meet or exceed applicable legislation and policy for the management of hazardous substances (10.3.6)	6.2.6.1 implement life-cycle management / continue to reduce the use of hazardous material (10.3.6.1)		Parks and sites must comply with provincial and federal regulations regarding disposal of hazardous waste (i.e., oil). There is a number of vehicle maintenance agreements (many with green procurement clauses) which transfer the problem of managing the hazardous materials to the service provider.
6.2.7	Meet or exceed the federal commitments, including the Montreal Protocol, to manage ODSSs (10.3.7)	6.2.7.1 complete a national inventory of Ozone Depleting Substances in use by Dec. 2000 (10.3.7.1)		A national inventory of equipment containing halocarbons (i.e., air conditioners both in buildings and vehicles, refrigerators, freezers) has not been completed and no new target date for completion of the inventory had been set at the time of this Review.

OBJECTIVE 6.2 Reduce and prevent pollution from facilities and lands (10.3)		
TARGET	ACTIONS	PROGRESS
6.2.8 Reduce green house gas emissions consistent with federal government policy (10.3.8)	<p>6.2.8.1 ensure that 50% of new vehicles bought or leased for over 1 year in 1997/98 (March to March) can use alternative fuels (10.3.8.1)</p> <p>6.2.8.2 ensure that 75% of new vehicles bought or leased for over 1 year in 1998/1999 and after can use alternative fuels (10.3.8.2)</p>	<p>Consistent with the <i>Alternative Fuel Act</i>, Parks Canada only converts new vehicles to alternative fuel use when it is feasible and cost-effective to do so. TB provides a software called Q-Tools to calculate the cost effectiveness of the conversion to alternative fuel. A government-wide database on all new vehicles purchased and which meet the criteria for conversion is maintained by a private sector consultant on contract to PWGSC. Parks Canada inputs data on new vehicle purchases to this database and receives information on which vehicles meet the criteria. Of the 59 vehicles purchased in 1997/98, 10 meet the test for conversions however 11 were in fact converted to alternative fuel use. In 1998/99, Parks Canada bought 144 vehicles of which 10 meet the criteria for conversion however, 20 were converted. Therefore, Parks Canada has exceeded its requirement to ensure that purchased vehicles run on alternative fuel.</p> <p>Parks Canada does not have a national database of leased vehicles and does not track nationally how many of these operate on alternative fuel.</p>
	6.2.8.3 reduce the number of small engines, upgrade the heating systems in workplaces (10.3.8.3)	While there is anecdotal evidence that HVAC systems are being converted from electricity and oil to natural gas there is no national inventory tracking this activity.

4. THE MANAGEMENT FRAMEWORK AND SUPPORTING SYSTEMS

Although not the central question in this review observations about the planning framework, clarity and measurability of the commitments in the plan and the extent to which management systems existed to support managing, monitoring and reporting on the commitments could not be avoided.

The planning framework refers to the links between the goals, objectives, targets and actions. The first and major difficulty with the framework is that targets, with some notable exceptions in the area of establishment and the environmental management system, rarely reflect true targets but were instead written as subcomponents of the objectives. A related issue concerns the logical flow from overall goals through objectives, targets and actions. For example under the fifth goal "Promote sustainable development as a basis of community operations", the second objective "Participate in SD regional development efforts" goes well beyond the focus in the goal on community operations. The target associated with this objective refers to all three of Parks Canada's major systems (i.e., parks, marine conservation areas and historic sites) but the actions specifically refer to biosphere reserves in national parks and national marine conservation areas and a general commitment to introduce SD concepts into discussions with other organizations. In this case, the overall goal seems to be a subset of one of the objectives. The associated actions only focus on some aspects of the objective.

A second issue concerns the clarity, and measurability of the various commitments. Ideally, commitments, particularly at the level of actions, should be time bound and where appropriate quantifiable (i.e., 3 parks will be established by 20004, 80% of the CIS will be completed by 2002). Commitments related to the "establishment" goal were amongst the strongest with respect to providing clear, measurable, time bound targets and actions. Many of the commitments with regard to the EMS were also good examples of clear, time bound, measurable actions.

Some of the existing commitments referred to discrete concrete actions where it would be relatively easy to specify a time frame when the action would be completed (e.g., study impacts of human use on ecological integrity, undertake environmental impact analysis, acquire and maintain integrated databases on native species for all national parks, assess the commemorative integrity of national historic sites, complete all commemorative integrity statements). Other commitments were open-ended and vague (e.g., continue to provide assistance for studies, continue to develop an ecosystem-based management approach, continue to support biosphere reserves, continue to educate visitors on impacts, and continue to participate in local and regional planning). In all of these cases, the lack of a time frame and success criteria make it difficult to determine if the commitment has been successfully achieved.

A third issue concerns the management systems for assigning accountability to deliver on commitments and for monitoring and reporting on progress, and revising the plan as necessary. It was noted in conducting this review that despite changes in Parks Canada's priorities and commitments over the life of the Plan, the SD strategy itself was not updated to reflect these changes.³ In addition, many of the functional specialists who were asked to provide information for this review were unaware of the specific commitments made in the strategy. Together, this suggests that the strategy was not well integrated into

³ The only adjustments made to the plan occurred in the fall of 1999 as a result of a specific request by the CESD to update the commitments.

the management framework of the Agency. This is not to say that the commitments in the strategy were unimportant or not acted upon. Clearly many of the commitments are central to Parks Canada's mandate. Action has occurred in several areas. However, this is likely due to the fact that these goals were already being pursued outside of the SDS rather than to any specific incremental benefits of the SDS.

Because many of the commitments in the SDS are central to Parks Canada's mandate there are strong management systems which support at least some aspects of the strategy. Establishment activities, for example, are supported by nationally maintained management information systems which track progress for all three major systems (i.e., national parks, national marine conservation areas, and national historic sites). Clear accountabilities and management information systems also exist for tracking and reporting on a number of other specific actions and outputs as well (i.e., environmental assessment, participation in the Biosphere reserve program and EMAN, EISs, CISS and management plans).

On the other hand, the EMS aspects of the strategy, although relative strong in terms of stating measurable and time bound commitments, were amongst the weakest in terms of delivery due to lack of accountability structures for implementing the commitments and monitoring and reporting on progress. Many other commitments involve diffuse and ambiguous accountabilities and were not supported by national monitoring and reporting activities (e.g., most commitments involving working with or influencing partners or stakeholders).

In summary, in the course of the review problems where identified with the 1) the logical links between parts of the planning framework, 2) diffuse or ambiguous commitments which lacked measurable targets, 3) accountability for implementing, monitoring and reviewing the SDS as a whole and with specific elements of the SDS, and 4) a lack of management information systems for monitoring and reporting on specific activities, outputs and outcomes. According to the Commissioner of the Environment and Sustainable Development, these problems are not unique to Parks Canada but typical of the problems many departments have had in developing and implementing sustainable development strategies. Addressing these issues should be a priority in the next round of SDS development.

5. OVERALL ACHIEVEMENT OF GOALS AND OBJECTIVES

Despite the problems noted with the management framework and support systems noted in the previous section some specific commitments in the SDS where achieved and progress against other goals and objectives was noted. The following summary reports on objective achievement according to Parks Canada's current service lines in its PRAS.

5.1 Establishment (Objectives 1.1, 3.1)

Parks Canada has met its specific commitments in the plan to create two new national parks by 1999-00, enhance the system of national historic sites and maintain a lead roll in the Heritage Rivers Program. In addition Parks Canada is on track for delivering on its commitments to establish three national marine conservation area agreements by 2003-04 and three more national parks by 2003-04, although the Program has indicated that there is a need to obtain additional funding if commitments to expand the national heritage systems are to be achieved.

5.2 Protection (Objects 1.2, 2.1, 2.2 and 3.1)

A large portion of the commitments in the SDS are related to the protection of national heritage places (i.e., three of six goals, 27 of 56 actions). Parks Canada has made some progress in putting in place some basic elements required "to protect and preserve Canada's natural heritage" and "increase scientific understanding of natural systems and human/environment relationships." These elements include a small number of EISs, some basic elements of ecological monitoring programs, extensive environmental assessment of projects, as well as less extensive environmental assessment of policies and plans. In addition it has developed an overall national reporting framework for ecological integrity and the beginnings of baseline data related to the framework. Many specific activities aimed at fostering of scientific study and/or protection of the environment have also been undertaken (e.g., EMAN, biosphere reserves, the prescribed burn program). However, much of the activity that occurs related to these goals is not systematically monitored or measured so that it is not known how much of the activity occurs, what outputs are produced or what results are achieved. This was particularly true of the efforts to influence partners and others stakeholders, although at the time of the Review efforts were under way to develop an inventory of these activities in response to the Panel Report on the Ecological Integrity of Canada's National Parks.

A much smaller portion of the SDS is devoted to "protect and present Canada's cultural heritage". Again, tangible progress has been made with respect to putting in place basic building blocks such as CI statements and management plans for national historic sites which Parks Canada administers directly. Progress has also been made in assessing and improving the commemorative integrity of a small number of sites (i.e., 12 of 145 sites have been assessed). Recently, Parks Canada has made a commitment to assess the commemorative integrity of all sites it administers at a rate of about 15 per year over the next ten years. Parks Canada has also continued to participate in international heritage organizations although the ultimate result of this participation is less clearly articulated.

5.3 Heritage Presentation (Objective 4.1)

The overall goal with respect to heritage presentation was to "present Parks Canada mandate, values and systems as a living example of the sustainable use of Canada's natural and cultural heritage". Since 1997, a major review of heritage presentation programming was completed, the condition of heritage assets has been determined, and job descriptions for heritage presentation staff have been reviewed . All

of these initiatives serve as foundation pieces for the renewal of heritage presentation programming. More recently, national messaging, including sustainable development themes, has been approved for all communication activities. Throughout the period, Parks Canada has been working with the travel industry to influence their messaging regarding sustainable heritage tourism and the kinds of experience they offer their visitors at national parks.

Although a number of activities have been completed, Parks Canada does not have adequate measures of the key objectives in the plan which call for increasing awareness and understanding and support of visitors and other Canadians of Parks Canada's mandate, values and systems. A system for measuring visitors understanding of the importance of specific sites and parks has been developed and other systems are in the process of being developed. Until these systems are operational it will not be possible to draw conclusions about the extent to which Parks Canada has achieved these objectives.

5.4. Town Sites (5.1)

Clearly, progress has been made in developing plans and frameworks for achieving the goal of promoting sustainable development as a basis of community operations. At the time of the review one community plans and none of the frameworks were approved or implemented. Subsequently, several more community plans were approved. Work was also underway on developing monitoring and reporting frameworks that will allow Parks Canada to report on the sustainable development of the town sites in the future. It should be noted that there were no target dates for any of the activities or objectives in this goal and this limited the extent to which conclusions could be drawn regarding the reasonableness of the progress noted.

5.5 Environmental Management System (Objectives 6.1 and 6.2)

As noted, the implementation of the commitments with respect to reducing and minimizing the environmental impacts of Parks Canada's operations are among the weakest in the plan. Many of the commitments have simply not been acted on or if they had, there was no management system in place to monitor and report on the actions undertaken. Given this, it is safe to conclude that Parks Canada has not met its goal of demonstrating exemplary environment management throughout Parks Canada's operations. The Commissioner of the Environment and Sustainable Development noted Parks Canada's performance problems with respect to EMS in his May 2000 Report to Parliament. As a result, Parks Canada has begun a review of its EMS and has written the CESD committing to addressing the problems by March 2001.