



February 11, 2015

Hon. Lawrence MacAulay  
Minister of Agriculture and Agri-Food  
House of Commons  
Ottawa ON K1A 0H6

Dear Minister MacAulay,

On behalf of Nature Canada, I am writing to request that you announce an immediate pause in the transfers to Saskatchewan of thirty remaining grasslands formerly managed by the Prairie Farm Rehabilitation Administration (PFRA) until a legally binding plan is in place to protect their ecological values.

Canada simply cannot afford to lose more grasslands -- the most imperilled ecosystem in Canada. Prairie grasslands are critical habitat for threatened species such as Greater Sage Grouse, Burrowing Owl, Swift Fox and Ferruginous Hawk as well as providing an important carbon sink for greenhouse gas emissions. Transfers of management responsibility of the former PFRA grasslands to the Saskatchewan government should be halted until Canada and Saskatchewan agree on such a plan.

In her January 26, 2016 report, Julie Gelfand, Commissioner of the Environment and Sustainable Development, concluded that AAFC "did not adequately apply the *Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals* and its related guidelines to policy, plan and program proposals submitted for approval to an individual minister or Cabinet . . ." According to Gelfand's report, AAFC has agreed "to take the necessary steps to review its strategic environmental assessment guidance documents and processes to ensure consistency with the Cabinet directive. The target date is 31 December 2015."

Nature Canada has confirmed with AAFC that contrary to the Cabinet Directive, no strategic environmental assessment was carried out by the former Harper government prior to its 2012 decision to transfer management of the one million hectares of PFRA grasslands to the prairie provinces. Interestingly, a 2007 AAFC strategic environmental assessment concluded that "significant economic, social and environmental benefits" would arise from a proposed investment to maintain and improve the PFRA community pastures.

Given the ecological importance of these grasslands (e.g., habitat for numerous species at risk listed under the *Species at Risk Act*), Nature Canada urges you to direct your officials to prepare such a strategic environmental assessment in collaboration with the Canadian Environmental Assessment Agency and the Canadian Wildlife Service and develop a legally binding plan before transferring any of the thirty remaining former PFRA grasslands to Saskatchewan.



Nature Canada wishes to acknowledge the agreement reached between AAFC and Environment Canada earlier this year to transfer management responsibility for the 28,000 hectare federally owned Govenlock grassland (a former PFRA community pasture) in southwestern Saskatchewan. The transfer of these lands to Environment Canada is an important step towards establishing a National Wildlife Area, which will greatly assist in protecting their ecological values as well as begin to meet Liberal platform commitments to establish new National Wildlife Areas.

Protection of these thirty grasslands is a tremendous nature conservation opportunity. As well, these grasslands would continue to provide local ranchers (pasture patrons) with ongoing grazing for their cattle, providing jobs and economic benefits in rural western Canada.

Nature Canada therefore encourages you to announce an immediate pause in the transfer of PFRA community pastures to Saskatchewan together with a public process to develop a plan that protects the ecological values of the thirty Saskatchewan grasslands.

Sincerely,

A handwritten signature in black ink that reads "Eleanor Fast".

Eleanor Fast  
Executive Director

cc. Hon. Catherine McKenna, Minister of Environment and Climate Change  
Hon. Ralph Goodale, Minister of Public Safety  
Hon. Lyle Stewart, Minister of Agriculture, Saskatchewan  
Ron Hallman, President, Canadian Environmental Assessment Agency  
Julie Gelfand, Commissioner of the Environment and Sustainable Development  
Zoë Caron, Policy Advisor, Office of the Prime Minister  
Lorne Scott, Nature Saskatchewan  
Trevor Herriot, Public Pastures, Public Interest