

WRITTEN SUBMISSION BY GPI ATLANTIC TO

LAW AMENDMENTS COMMITTEE

RE: PROPOSED AMENDMENTS TO THE
WILDERNESS AREA PROTECTION ACT

NOVEMBER 3, 2009

**Written submission prepared for the Law Amendments Committee
By GPI Atlantic**

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Good afternoon. My name is Linda Pannozzo and I'm a Senior Researcher with Genuine Progress Index (GPI) Atlantic—a Halifax-based non-profit research group dedicated to measuring the social, economic, and environmental dimensions of progress. I would like to thank the Committee for this opportunity to comment on some key issues regarding the proposed amendments to the Wilderness Area Protection Act.

But first we would like to commend all the incredible work—which the NDP vigorously supported over the years—by numerous organizations, to expand and strengthen our protected areas legislation and the amount of land protected in this province. The expansion of protected areas and the strengthening of protection is one key area where the Nova Scotia Genuine Progress Index has recorded steady and positive progress over time.¹

Sadly, this important and hard-won legislation, which was aimed at protecting not only the precious landscapes of the province but the biodiversity found there, has actually been under threat for two years now, as the previous government, with the support of the NDP, has already authorized seal hunts on Hay Island, on the basis of the very tenuous argument—inadequately supported by either historical or scientific evidence—that the killing of seals was a way to protect nature. Now, this new NDP Bill, if passed, will allow for the slaughter of Grey Seals on Hay Island without needing to resort to such dubious arguments, thus making authorization much easier.

¹ In 2008, GPI *Atlantic* reported that roughly 8.5% of provincial land was under some form of protection in this province – still well below the minimum of 12% recommended by the World Wildlife Fund (WWF) in its global protected areas campaign more than 25 years ago. The government recently committed funds to purchase more land for the purpose of protection—an important and positive move entirely in line with the GPI measures and the consensus values on which those measures are based. As scientific evidence in several GPI reports indicates, as conservation biologists have testified, and has also been suggested by NS Department of Environment staff in personal communications with GPI Atlantic, this 12% figure is actually well below what scientists have estimated is necessary to conserve biodiversity and slow down the current rate of species extinction, and should probably be much higher. Nevertheless all progress towards the interim 12% target is welcomed from a diversity conservation perspective.

Authorizing a seal hunt on Hay Island not only goes against the spirit of the Wilderness Areas Protection Act, but infringes the letter of the current Act as well, thus giving rise to this very unfortunate proposed amendment, which would immeasurably weaken the Act in both word and intent.

The whole point of wilderness protection is that it has to be sacred, certain, and long-lasting, and cannot be subject to political expediency and temporary shifts. Otherwise the very concept of ‘protection’ itself loses its essence and meaning. Historical and scientific evidence indicates that seal and fish stock balances were self-regulating in the marine ecosystem long before human intervention—which is why arguments that the seal hunt is needed now to conserve diversity are so scientifically dubious. To change the Wilderness Area Protection Act to allow for commercial activity of this nature would first and foremost be setting a disturbing and highly misguided precedent. If the Act can be weakened and its basic intent and purpose compromised at will to allow for one kind of commercial activity, what other kind of commercial activity will justify its further weakening?

Biodiversity cannot be assessed simply by the counting of species. Biodiversity is the variety of life and all its processes, and includes the range of living organisms within an ecosystem, their genetic differences, and the communities in which they naturally occur. The biodiversity of the wilderness area in question obviously includes the Grey Seal population. A wilderness area—and its capacity to safeguard nature’s balance and self-regulatory mechanisms, including very complex predator-prey relationships—must account for and protect all wildlife in that area, not just those species particularly favoured by some humans for their personal consumption. If there is any question about *which* species has caused the decline and indeed collapse of much of the fishery in Atlantic Canada, let me remind the Honourable Members of what should by now be a powerful precautionary tale and historical lesson for this region.

In the late 1980s, Nova Scotia’s fishery for cod and other groundfish seemed to be booming. The media reported steady catches, high exports, and strong contributions of the fishery to the province’s Gross Domestic Product (GDP)—the conventional measuring stick of the economy.

But behind the scenes—and invisible in GDP statistics—fish stocks were dropping drastically. By 1992-1993, many fisheries were collapsing, the great northern cod was near extinction, and the fabric of coastal communities in this province began to unravel. The fishery GDP, which had stayed at high levels right up to the time of the collapse, dropped

by almost half to around \$200 million by 1995.² Our conventional economic measuring sticks, notably the fishery GDP, but also related measures like fish catches and exports, sent no early warning of the impending ecological and social disaster. These measures counted only what we took out of the sea but gave no value to what we left behind. It is the *human* species, with its narrow focus on extractive and consumption measures, that bears full responsibility for the groundfish stock collapse of 1992-93.

If healthy fisheries and protection of the marine environment are important to us, then we clearly need a set of measures that better reflect the reality of what we value and that assess the wellbeing of the fishery and the marine environment more accurately. This can be done. It just requires the political will to do it.

Genuine indicators of fishery and marine environmental health would allow us to track over time the state of fish populations, the fishery's contribution to our economy, the quality of the marine environment, and the wellbeing of the communities that depend on the ocean for their livelihood. In other words, an appropriate set of indicators would prevent wrongheaded decisions such as this one to allow for the hunting of seals in a protected area.

In 2008, GPI Atlantic released an update of a comprehensive 2001 report on the Fisheries and Marine Environment of Nova Scotia, authored by Tony Charles and colleagues at Saint Mary's University, and found that groundfish stocks have declined drastically since the 1980s; the cod biomass shows no sign of recovery, while haddock and pollock stocks show only limited recovery; and species at the top of the marine food web have been depleted by overfishing and increased fishing effort and lower trophic level species are now the primary target and source of revenue in Nova Scotia's fisheries. Sadly, marine mammals at risk continue to experience substantial population declines in Atlantic Canada.

These results and others—particularly in regards to marine environmental quality—illustrate that the scope of the challenges facing the fishing industry and indeed society, are daunting, and have little to do with seals.

The problem with reliance on GDP-based measures of progress is not only that they *omit* key ingredients required for a healthy fishery, but that they perversely count the depletion of natural wealth as economic gain. Grey seals on Hay Island are part of the natural

² In 1997 constant dollars.

wealth of the marine environment. They also contribute to the aesthetic values and tourism values of the Scaterie Island Wilderness Area. As a species, they also play a vital role in a complex food web and have intrinsic value, which must also be recognized and accounted for in assessments of value.

For all these reasons, we strongly recommend that these amendments, which will allow the Minister more easily to authorize a seal hunt in a protected area, be rejected by the Law Amendments Committee. Instead, the Department of Fisheries and the Department of Environment should work together, along with the Department of Natural Resources (because many forest dependent species are aquatic), and begin using genuine indicators that would accurately and comprehensively measure fishery, marine environmental, and forest health—a holistic set of measures that recognizes these areas are all interconnected. In particular, the Nova Scotia Government must cease its reliance on the economic growth statistics that inevitably give precedence to commercial activity over the natural balance on which human survival ultimately depends.

In closing I would like to quote from the NDP's own environmental policy adopted at its Annual General Meeting this past spring. It states:

“...the NDP recognizes the indicators that underpin government decision-making are inadequate. At present, growth, as measured by Gross Domestic Product, is the standard employed to assess the health of the economy. GDP fails to take into account such factors as population health and age, education, wealth distribution, unemployment, the voluntary sector, unpaid labour, poverty, crime, pollution, resource depletion and loss of biodiversity. These indicators have been incorporated by GPI Atlantic into a groundbreaking ‘genuine progress index’ that provides the full-cost accounting necessary to analyze the environmental and other ‘externalized’ costs involved in the entire life cycles of products and processes...The use of the genuine progress index in public decision making in Nova Scotia would enable the province to seriously address the goal of achieving sustainable development.”³

³ Taking Back Our Future. An Environmental Policy Framework for the Nova Scotia NDP. Report of the Nova Scotia NDP Environment Subcommittee to the Annual General Meeting of the Nova Scotia New Democratic Party, March 28, 2009. pp. 3-4.

Allowing the slaughter of seals in a protected wilderness area is not only the antithesis of this stated NDP environmental vision and commitment. It is also a very dangerous precedent that provides no real benefits⁴ when measured conventionally or otherwise, and will potentially cause very serious harm.

Developing a comprehensive, accurate and meaningful assessment of the state of the fishery and the health of the marine environment is the real challenge, and the solution cannot be found in a failed industrial model supported by narrow and discredited progress measures that inevitably lead to misguided policy actions like the one currently under consideration by this Committee. We urgently need new measures that properly account for the value of our natural, human, and social wealth. Once we have these, good policies will follow.

Thank you very much.

Also submitted to the Committee:

New Policy Directions for Nova Scotia: Using the Genuine Progress Index to Count What Matters (2009) by Linda Pannozzo and Ronald Colman. Genuine Progress Index Atlantic. Halifax. http://www.gpiatlantic.org/pdf/integrated/new_policy_directions.pdf

⁴ The Honourable Minister of Fisheries and the Environment was himself quoted as saying that a review found no environmental benefits to the hunt. The Canadian Press. Belliveau to have final say on seal hunt in protected area. Oct. 27, 2009. The “review” being referred to was titled: Winter 2008 Hay Island Grey Seal Harvest: Follow-Up Report. Final Copy. Submitted by Minister Chisholm (Department of Fisheries and Aquaculture) to Minister Parent (Department of Environment). June, 2008.

1. BACKGROUND ON GPI ATLANTIC

Genuine Progress Index Atlantic is a non-profit research group founded in April, 1997. For more than a decade, GPI Atlantic's focus and mandate have been to ask what *genuine progress* in Nova Scotia looks like, and to attempt to assess whether we are achieving such progress. In order to do this, GPI Atlantic has developed a set of genuine progress indicators for 20 components comprising a wide range of social, economic, and environmental dimensions.

From the GPI perspective, value should be explicitly placed on the human, social, cultural, and natural capital that are integral components of our national and provincial wealth, along with the financial and produced capital conventionally measured. All these assets are subject to depreciation and require re-investment to restore and enhance their value. At the same time, activities like crime, unemployment, and car crashes that cause harm to society, and activities like GHG emissions, pollution, and resource depletion and degradation that cause harm to the natural world and to its essential life support systems, are also recognized in the GPI as having adverse economic impacts, and therefore register as costs. Essentially—from a GPI perspective—the economy should be designed to serve the interests of people and the planet, which are of course inextricably linked.

In April of this year, GPI Atlantic released its *2008 Nova Scotia GPI Accounts*, the culmination of nearly 12 years of developmental work to create a Genuine Progress Index for the Province. This completed set of indicators and accounts is intended to provide government with a practical tool to measure progress towards genuinely sustainable prosperity.

In the last 12 years, GPI Atlantic has monitored trends in more than 100 indicators of social, environmental, and economic wellbeing and has demonstrated definitively that omission of these key measures of environmental sustainability, quality of life, health, equity, and financial security in the Gross Domestic Product make the GDP a misleading and delusional statistic when it is mistakenly used by policy makers as a measure of societal progress and wellbeing.

The purpose of the new GPI measurement system is precisely to identify the Province's strengths so that we can build on them and protect them rather than take them for granted, and to identify weaknesses so that we can work to overcome them as soon as we detect early warning signals.

Since the Second World War, economic growth statistics based on the Gross Domestic Product (GDP) have been widely and mistakenly used as a proxy for societal wellbeing and prosperity. This was not the intention of those who created the GDP. Thus, Simon Kuznets, Nobel Prize winner and principal architect of national income and GDP accounting, warned 40 years ago:

“The welfare of a nation can scarcely be inferred from a measurement of national income... Goals for “more” growth should specify of what and for what.”

Unfortunately, we currently continue to measure our progress and gauge our wellbeing according to this narrow set of materialist indicators—our economic growth rates. Even small changes in the Gross Domestic Product (GDP) and related market statistics are closely monitored by policy makers, while vital social and environmental factors remain invisible in our national accounts and core progress measures. The GDP is not designed to distinguish between what benefits and harms society, but is a narrow market measure that accounts for only a fraction of true societal wealth. Because it is not an indicator of prosperity or wellbeing, it cannot and should not be used to inform the making of policy that has those goals.

Because what we count and measure reflects our values as a society and determines what makes it onto the policy agendas of governments, we urgently need better measures of wellbeing and progress that account for a more complete range of social, economic, and environmental factors. Carefully chosen indicators like those in the Genuine Progress Index can therefore tell us far more accurately whether we are better off than we used to be, whether we are leaving the world a better place for our children, and what we need to change in order to move towards genuinely sustainable prosperity.