

## SECTION B: PARKS CANADA AS AN ORGANIZATION



A warden patrols the backcountry of Banff National Park on horseback. W. Lynch/Parks Canada

### CHAPTER 2: TOWARD A CULTURE OF CONSERVATION

To successfully manage national parks with a conservation focus, Parks Canada must establish a clear vision around the primary objective of protecting ecological integrity, and align the whole organization behind this agenda. Shifts in decision-making, staffing, training and relations with employees and park neighbours are needed to accomplish this transformation. Making these shifts, to create an internal culture of conservation, is the single biggest challenge facing Parks Canada.

To make these large shifts, Parks Canada must become a learning culture where evaluation and feedback are welcome and knowledge and expertise are valued. Accomplishing this shift offers significant opportunities for innovation, leadership and bold action so that every decision and action enhances the integrity of the parks.

The new status as an Agency, and requirements of the Parks Canada Agency Act, provide an excellent opportunity for the organization to move forward in a new direction.



## Toward a Knowledge-based Organization

The organization that will successfully address the issues outlined throughout our report must have the following characteristics:

- a clear vision and mandate;
- professional leadership for ecological integrity on the Executive Board of Parks Canada;
- employees being seen as core assets; the organization invests in and values employees;
- a genuine partnership with employees that inspires learning, innovation, personal and professional growth and is built on the principles of respect, equity, and empowerment;
- staff who are all empowered to pursue the vision and mandate, and accountable for achieving measurable targets associated with ecological integrity;
- the ability to incorporate knowledge and to enable knowledge to flow freely throughout the organization;
- transparency and openness, where feedback is essential and critical debate is welcomed — the keys to building a knowledge-based organization.

In other words, Parks Canada must become an open, innovative, knowledge-based organization with a consistent focus on ecological integrity.

### The Parks Canada Agency Act — An Opportunity for Change

A clearly stated goal for protecting ecological integrity formally arrived in 1988 in the form of a revised National Parks Act. The 1988 legislative commitment was followed by a decade of continuous organizational restructuring and declining financial and human resources, despite the positive though short-term effect of funding associated with Canada's Green Plan.

This was a difficult period for Parks Canada, as the organization responded to many other government agendas. In the last two decades, Parks Canada employees have witnessed a series of rapid organizational transformations from events such as budget cuts, reviews, a series of re-organizations, the moving of Parks Canada from one federal government department to another, and the wide-scale adoption of a "business approach." These changes have not reflected fully the need to involve ecological integrity values in the organization's orientation, leadership, hiring and training, budgeting priorities, and operational management. The organization that emerged had not made the fundamental changes in structure, prioritizing and decision making required to implement the 1998 mandate change.

In 1999, the Act that created the new Parks Canada Agency emphasized the priority for ecological integrity in a broad and strong preamble:

*Whereas it is in the national interest:*

*(a) to protect the nationally significant examples of Canada's natural and cultural heritage in national parks, national historic sites, marine conservation areas and related heritage areas in view of their special role in the lives of Canadians and the fabric of the nation,*



*(g) to maintain or restore the ecological integrity of national parks*

*(l) to maintain ecological and commemorative integrity as a prerequisite to the use of national parks and national historic sites, and*

*(m) to manage visitor use and tourism to ensure both the maintenance of ecological and commemorative integrity and a quality experience in such heritage and natural areas for this and future generations*

Parks Canada Agency Act (1999)

Parks Canada can use several statutory requirements in the Agency Act to reposition itself and become an organization with a culture of learning and conservation. Such a shift will help Parks Canada to achieve its mandate and will act as a catalyst for change. National parks can engage all Canadians in a national culture of conservation that works to maintain and restore Canada's ecological integrity, with national parks as core protected areas within a broader sustainable landscape. These shared objectives — an internal repositioning and a catalyst for society — are both in the national interest.

Many of the elements included in the Agency Act, and the early initiatives aimed at revitalization since the Agency's creation, provide opportunities that can help achieve this end. For example, the Agency Act required the creation of a Charter to set out the values and principles of the Agency:

*16. (1) The Chief Executive Officer is responsible for establishing a charter for the Agency that sets out the values and principles governing*

*(a) the provision of services by the Agency to the public; and*

*(b) the management of the human resources of the Agency.*

*35. (1) The Chief Executive Officer must, at least every five years, have prepared by a person or body, other than the Agency or any of its employees, a report on the consistency of its*

*human resources regime with the values and principles that are to govern the management of its human resources.*

Parks Canada Agency Act (1999)

The Charter can be a tool to position conservation as a core value of Parks Canada. Staff at all levels should be invited to participate in the Charter's development, so that the final Charter document is supported by all. If protecting ecological integrity is everyone's job, it follows that each staff member should contribute to repositioning the organization. Soliciting and incorporating input from all staff will help to heal the organization and to create an environment that supports open communication.

A further requirement of the Parks Canada Agency Act, to convene a national round table to advise the Minister, provides an opportunity for Parks Canada to obtain an external review of key programs or policies. This mechanism can be used by Parks Canada to assist in ensuring that key accountability measures are working:

*8.1 (1) The Minister shall, at least once every two years, convene a round table of persons interested in matters for which the agency is responsible to advise the Minister on the performance by the Agency of its responsibilities under section 6.*

*(2) The Minister shall respond within 180 days to any written recommendations submitted during a round table convened under subsection (1).*

Parks Canada Agency Act (1999)



## Aligning Parks Canada with its Mandate



National park staff must develop a range of competencies to deal with many complex issues.  
J. Pleau/Parks Canada

The Panel's comments in this chapter and throughout this report reflect what we heard and observed repeatedly in consultations with staff at all levels of Parks Canada and in presentations from people outside the organization. We are aware that in the recent past many new initiatives and programs have been launched. These present excellent steps toward protecting ecological integrity and aligning Parks Canada behind its mandate. However, we saw that a cultural dichotomy continues to exist in Parks Canada. We heard very clearly that employees are concerned about the state of the parks and deeply

Gros Morne National Park staff at the site of a recent oil spill. P. Wilkinson



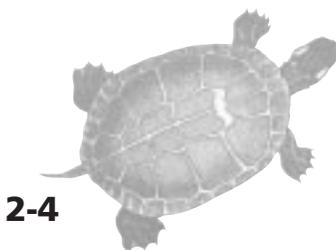
frustrated about the ability of Parks Canada to respond to threats to the ecological integrity of the parks.

We were told repeatedly that the major hurdles to achieving the mandate can be found within the organization. Our conclusion is that without significant and speedy attention to Parks Canada's organizational culture, the new initiatives, programs and even additional resources will not serve to improve the state of Canada's national parks.

### Parks Canada — Managing a Range of Responsibilities

The Parks Canada Agency is charged with managing a diverse range of programs — national parks, national marine conservation areas, heritage rivers, heritage waterways (such as the Trent-Severn Waterway), national historic sites and federal heritage buildings and heritage railway stations. These are very different programs, requiring different skills and management.

Ecological integrity, as a legal requirement, is only found in national parks. This is problematic for Field Unit Superintendents, whose Field Unit can cover a range of program elements. Within the Field Unit, a superintendent is forced to make decisions on allocation. The choice often becomes one of ecological integrity versus historic conservation. As an example, we heard that most ecological research in Cape Breton Highlands National Park was suspended because the water system at Fortress Louisbourg needed to be replaced. This is an inherent structural problem in Parks Canada.



Parks Canada has restructured to try to blend these diverse program elements, but “blending” causes its own problems. For example, national historic sites use the term “commemorative integrity” but there is no parallel with ecological integrity. However, the two terms are blended throughout Parks Canada under a third term, “heritage

integrity.” The public, the academic community and even the Parks Canada Agency do not understand this term. It is a bureaucratic invention aimed at blending two essentially different concepts, and as an invention, it completely fails.

The diversity of programs makes it difficult for Parks Canada to focus on ecological integrity. It also makes it difficult to decide on expenditure priorities between programs — for example, between national parks and heritage waterways. While there is common ground between programs, the Panel has observed that program blending results in a loss of focus on ecological integrity. If national parks are to be managed for ecological integrity, the management structure of Parks Canada must be aligned to allow this to

happen. Throughout our report, we focus on clear accountabilities, planning structures and budget envelopes. We hope this provides a framework to guide the necessary changes to management structure.

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## There is No Dual Mandate

Prior to the 1988 amendment to the National Parks Act that included ecological integrity, some people felt that Parks Canada had a dual mandate consisting of equal but competing interests: visitor use and keeping the parks unimpaired for future generations. This debate was statutorily ended by the Act’s legislative requirements that ecological integrity and resource preservation are the first consideration when managing a park.

However, a proper reading of the National Parks Act of 1930 reveals that even before the 1988 amendment there was no dual mandate. The dedication clause of the National Parks Act of 1930 states that national parks must be made use of in a manner that leaves them unimpaired for future generations. This concept of “unimpaired” was complemented by the 1988 ecological integrity amendment, which made it clear that ecological integrity is the first consideration in managing visitors.

Parks staff must receive a clear signal and acknowledge that there is no dual mandate but rather one single mandate. Parks are places for the protection of ecological integrity and for visitors to experience and enjoy nature in a manner that leaves ecological integrity unimpaired.

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## A Dedicated Workforce

While the Panel expected to be awed by the beauty and grandeur of Canada’s national parks — and we were — the intense loyalty to these parks demonstrated by Parks Canada staff equally impressed us. Park staff refer to the wonder of the places in their care, the privilege of working on behalf of national parks and Canadians, and the wish to pass on to future generations a living manifestation of the respect that they hold for the natural world.

Parks staff are faced with complex threats to the ecological integrity of national park ecosystems and regularly adjudicate between strong development interests and the ideals of preservation. The issues related to managing parks are sometimes so complex that the ideal of ecological integrity is perceived as only one of many priorities.

In the past few years, parks staff have endured tremendous organizational change yet staff members continue to eagerly seek ways to improve their stewardship of national parks. Many well-intentioned and highly qualified people have been struggling with these important issues long before this Panel was formed. Many have achieved great successes in the face of difficult circumstances, and our report could not possibly document the numerous successes that staff have created by virtue of their determination and vision.

By pointing out the need for a change in Parks Canada’s organizational culture, we do not wish to devalue the work and achievements of the hundreds of dedicated employees within the Agency. We do wish to highlight the need to move from a culture of business and recreation to a clear and supportive culture of conservation. We think that ecological integrity is the unifying factor that can direct this learning process which is necessary to a culture of conservation.



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*“[T]he primary obstacle to maintaining EI [ecological integrity] in Canada’s National Parks is the lack of a genuine commitment to that goal... This is a cultural problem... Despite all the promising rhetoric, the fact is that staff in National Parks are restrained by a corporate culture that does not value, indeed actively discourages, advocacy and activism in defense of ecological integrity. It is abundantly clear to anyone who has spent time in the organization, that Parks Canada is basically passive and conservative. The road to advancement is revenue generation, the development and maintenance of facilities, public safety, and other such practical matters. Environmental advocates, I think it’s fair to say, are regarded as dreamers, eccentrics, or as troublemakers.”*

park neighbour,  
submission to the Panel

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## A Law-Policy Disjoint

Currently, the National Parks Act does not refer to ecological integrity except in relation to zoning and visitor use, in sharp contrast to Parks Canada policy that says that ecological integrity takes “precedence in acquiring, managing, and administering heritage places,” which is more inclusive. The preamble to the Parks Canada Agency Act more clearly and broadly interprets the principal importance of ecological integrity as it relates to national parks. Legislative preambles are, however, not legally enforceable. This disjoint between the law and the policy leads to confusion among senior managers who are uncertain of their legal footing with regard to advocating for parks in matters that originate inside or outside or park boundaries. The law-policy linkage needs to be strengthened through revisions to the Act.

Some Parks Canada personnel regard ecological integrity as one of the many new winds that have blown across their desks and may blow away again; for others, ecological integrity is perceived as a threat to their jobs. Operationally, ecological integrity has been regarded as one of a number of priorities, rather than as the single unifying concept that provides direction to all national parks programs. (The Panel has heard many times that “ecological integrity is not our only job.”) Employees commonly

speak of the pendulum that swings between ecological integrity and the more market-oriented side of park management.

We have heard a variety of perspectives regarding ecological integrity, including:

- the perception that Parks Canada has a dual mandate that seeks to achieve an equitable balance between human use of the parks and protection of ecological integrity;
- the belief that ecological integrity is just another goal or task added to the already large list of goals for Parks Canada;
- the concern that recognizing ecological integrity as core of Parks Canada’s mandate means “no human use” in national parks;
- the perception that ecological integrity is not “everyone’s job” but rather the job of the park ecologists.

We repeatedly observed or heard:

- the perception that while ecological integrity is the core of the official mandate, Parks Canada has in philosophy and practice a mandate of use, revenue generation and compromise concerning such issues as infrastructure maintenance, development and tourism;
- in business planning exercises, items have been re-organized and re-classified to give the appearance that sufficient items and budget dollars are associated with ecological integrity issues;
- the perception that management decisions at the park level, ostensibly in the interest of ecological integrity, are really capital improvements in infrastructure for non-ecological purposes;
- in the experience of park staff, if a sound conservation-oriented proposal threatens revenue generation, particularly in smaller parks, the implications for revenue weigh heavily in the final decision for approval of the proposal.

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## The Language of Business

*Currently the language of Parks Canada is oriented toward business and development. The adoption of business language within Parks Canada (terms such as “CEO,” “clients,” “business plans,” “revenue”) and resource-harvesting language (terms such as “resource management”) while perhaps perceived as only a semantic issue, clashes with the values of a conservation-based organization and symbolizes the importance of the revenue and development themes. We propose, for example, to change “CEO” to “Commissioner” — a terms that reflects the history of Canada’s national parks.*

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## TransAlta Transformed: Ideas for Shifting Organizational Culture

TransAlta, Canada's largest investor-owned utility, is involved in generation, transmission, and distribution of electricity based in Alberta. More than 85 per cent of the company's electricity is generated from coal combustion; TransAlta is responsible for six per cent of Alberta's total CO<sub>2</sub> emissions and is Canada's single largest producer of CO<sub>2</sub>.

Government policy initiatives and the concern about the potential for strict emission limits have motivated TransAlta to transform its corporate mind-set and make a conscious shift toward sustainability. The shift was also based on growing internal awareness of the challenges and opportunities for emission reduction, and a desire to try a voluntary approach to reduction of emissions instead of legislated reductions.

The company undertook a series of internal management changes that provide a model for understanding how to shift organizational culture to a more ecological focus. The shift was accomplished through internal management and incentives, including:

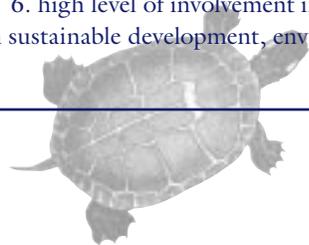
1. establishing a Sustainable Development Group that integrates former Environmental Affairs and Safety departments; headed by a corporate vice-president;
2. strong senior management commitment and monitoring to ensure:
  - review of progress toward emissions reductions and other sustainable development efforts are on the agenda of every Board of Directors meeting, the only non-financial items to be regularly addressed;
  - quarterly review of the action plan, with ongoing measurement and reporting, by senior officers;
  - third party assessments;
3. deliberate commitment to taking on projects that will advance the state of knowledge, practices, and technology regarding options for mitigating greenhouse gas emissions;
4. a deliberate initial and ongoing training program to orient all employees to this new mission, including:
  - a job rotation program to help disseminate the sustainable development approach throughout the company. Engineering graduates slated for positions in Generation, work in Sustainable Development for nine months before they begin their operations-level jobs. This experience and training exposes these new employees to TransAlta's environmental perspectives, which become integrated with their approach to their operations level tasks.
  - all employees received training in the concepts and issues surrounding sustainable development, using a two-day workshop conducted in cooperation with an environmental non-government organization, the Pembina Institute. New employees are now trained using an interactive CD-ROM;
5. employee financial incentives are tied to achievement of greenhouse gas reduction targets and other environmental goals (up to 16 per cent of salary for outstanding reduction improvements);
6. high level of involvement in multi-level organizations and working groups on sustainable development, environment, and climate change issues.

from Thompson (1998)

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For each staff category or position throughout Parks Canada, protecting ecological integrity should be "job one." For example, the park wardens and ecologists or Ecosystem Secretariat provide expertise and guidance in ecological issues management. The enforcement staff and resource conservation staff are instrumental in ensuring that park visitors comply with the requirements and laws that protect ecological integrity, from conducting environmental assessments to apprehending poachers. Interpretation and outreach staff should raise awareness and knowledge about the role of the park within the greater ecosystem, and encourage action by park visitors and partners on important management issues. Maintenance and cleaning staff affect ecological integrity directly by their choice and use of environmentally safe cleaning products and indirectly by demonstrating the relationship between environmental awareness and sustainable action (such demonstrations are further sources of interpretive messages).

Numerous corporations have embarked on sweeping re-orientation programs aimed at repositioning the corporation and educating staff regarding a new or revised corporate culture. For example, the Ford Motor Company's "job one" campaign was a clear message to employees and the public. In Canada, TransAlta made a major corporate shift toward sustainable development in the 1990s. These corporations offer models that Parks Canada could consider in making ecological integrity "job one" for all employees.



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## RECOMMENDATIONS

The overriding objective behind every recommendation in our report is to firmly and unequivocally establish ecological integrity as the core of Parks Canada's mandate. To do so, Parks Canada must transmit the key message to every member of the organization and its partners that:

- ecological integrity is everyone's job;
- ecological integrity is the primary criterion to be used in all decisions;
- the purpose of national parks is to protect ecological integrity.

2-1. To assist in transmitting this message we recommend that the Minister ensure that Bill C-70, or its successor, states clearly and without qualification that protecting ecological integrity is the first priority of national parks and that Parks Canada can achieve this purpose through managing for ecological integrity. (The Panel's suggested wording for various sections of Bill C-70 is contained in Appendix C.)

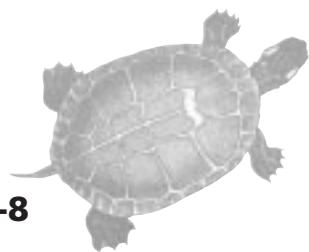
2-2. In accordance with section 16 (1) of the Parks Canada Agency Act, we recommend that within a six-month time frame, Parks Canada initiate the revision of the existing draft Charter that addresses the core values of the organization as they relate to the primary objectives and core mandate. For the National Parks Directorate of the Parks Canada Agency these core values should revolve around the concept of ecological integrity. To ensure that this Charter is understood and adopted by all staff and is reflective of the primary objective, Parks Canada should adopt a bottom-up process for developing the Charter by seeking input from staff at all levels of the organization.

2-3. We recommend that within six months Parks Canada begin a process to move away from the language of business and adopt a language that emphasizes ecological integrity and conservation.

2-4. We recommend that Parks Canada develop a detailed and ongoing program for ecological integrity orientation and training, with initial delivery to be completed within 18 months by all current employees (including contract employees, co-operating associations, partners, and co-operators such as commercial operators within parks). Make this training part of every new employee's orientation package. Conduct a third-party audit of the orientation program after three years to assess the status and future needs for the program.

This basic training program is to be supplemented by more advanced and targeted training programs covering skills needed for maintaining and restoring ecological integrity. For example, a training program should be developed to strengthen the capacity of regional Service Centre staff to participate in regional and provincial/territorial co-operative management efforts by:

- enhancing skills and responsibilities in liaison and co-operative management with provincial and territorial governments, Aboriginal peoples, communities, industry and other public or private agencies; and
- providing increased training in community liaison, negotiation, and communications.



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## Cultural Resource Management Policy Training

In 1993 Parks Canada began an extensive training program to orient managers, staff, stakeholders and partners to its new Cultural Resource Management Policy. Since the Cultural Resource Management Policy is based on the premise that anyone whose decisions or actions affect cultural resources is involved in cultural resource management — and that includes just about everyone — the target audience for this training has been very broad. The Chief Executive Officer, senior managers, front-line staff and experts in various disciplines have taken the training, as have people involved in historic site and cultural resource management outside Parks Canada.

The training consists of an introduction to the policy, a series of case studies wherein participants apply the policy to decision-making, as well as an overview of how cultural resource management has evolved over the centuries in western and non-western societies.

Capacity to organize and deliver the training has been developed in many parts of the organization so that people who take the training have a sense that this is a national initiative, not a central office exercise. This was critical to developing capacity, to making the policy an integral part of people's work and to developing linkages among those engaged in cultural resource management — including a number of national park wardens with cultural resource management responsibilities. Overall, the training is considered to be very successful and provides another model for training staff in the protection of ecological integrity.

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## Structure, Staffing and Decision-making

### Structure of Parks Canada

The area of the Parks Canada Agency with jurisdiction over national parks (called "Parks Canada" in this report) is currently made up of 32 Field Units and four Service Centres all reporting separately to the Chief Executive Officer (CEO). The Executive Board is made up of the CEO, the Directors General (East and West), the National Office Program Directors General, the Executive Direc-

tors of Québec and the Mountain Parks as well as the Director of Human Resources and the Director of Communications. Appendix D shows an organization chart.

Field Unit boundaries do not correspond to federal or provincial boundaries, nor do they correspond to ecological boundaries. Field Units are of varying size and spatial area and are made up of a combination of national parks(s), national historic site(s) and national historic canal(s). Each Field Unit is under the responsibility of a Field Unit Superintendent who is accountable for program delivery. Depending on size and location, some parks also have a Park Superintendent who is based on or near the site. The Field Unit Superintendent may be based in an adjacent park in the Field Unit or in another location.

Staff in St. Lawrence Islands National Park inspecting a black rat snake. Parks Canada



### The Effects of “Flattening”

Parks Canada’s structure was “flattened” greatly in recent re-organizations; middle management layers were removed and the official reporting relationships between Field Unit Superintendents and the Chief Executive Officer were simplified. We have observed that a variety of problems arise from this revised structure, particularly around the demands placed on Field Unit Superintendents. These problems have implications for meeting the ecological integrity objectives.

Field Unit Superintendents are asked to manage a variety of parks or sites of different importance, condition, scope or substance. In some units the combination of historic and natural sites presents a significant challenge. Some Field Unit Superintendents manage a large number of historic sites with complicated partnership arrangements or large funding commitments. The main consequence is that the Field Unit Superintendent may find it difficult to provide important substantive direction and leadership in the numerous specialties requiring management in these diverse responsibilities. As a result, the Field Unit Superintendent is often short of time, under-staffed, and constantly “putting out fires” on a range of issues from new uniforms for park staff to provincial negotiations over boundaries or management practices.

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### Georgian Bay Islands Directed Team Approach

At Georgian Bay Islands National Park — one of Canada’s smallest parks, with comparatively few resources and arguably some of the greatest threats — the Panel met a team of park employees who had adopted an alternative management model to help them co-ordinate their individual and collective roles in park management. In 1993, park management set aside traditional management frameworks and empowered all employees to be accountable for their actions. Their vision was defined as, “A shared commitment to the preservation and commemoration of our natural environment and cultural resources within the Greater Georgian Bay Ecosystem.”

Self-directed team structures were introduced along with an associated training program. The intent was that self-directed teams were to create an environment in which continuous learning was valued and supported.

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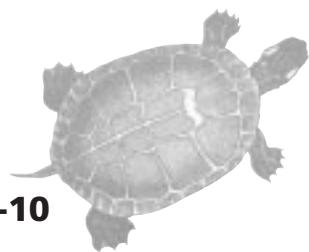
The long list of the Field Unit Superintendents’ responsibilities and the lack of structured professional support has made it difficult for Field Unit Superintendents to provide adequate attention and guidance on ecological integrity.

### Ecological Integrity in Decision-making and Staffing

A consistent theme associated with organizational culture and ecological integrity is the lack of a role for ecological integrity at the various decision-making tables. We consistently observed or heard that:

- the voice of ecological integrity is largely absent at all management decision-making levels because ecological integrity is neither perceived as “everyone’s job,” nor is there any one person or group formally accountable for ecological integrity;
- expertise in understanding and valuing ecological integrity is inadequate at most decision-making levels within the organization. Those with specific conservation or scientific expertise typically are not part of formal decision-making structures;
- the cumulative effect of small incremental decisions is not well understood or analyzed in decision-making processes;
- precautionary approaches to decision-making and management are not supported and employees have had the burden of proof reversed upon them — to show how a given proposed action or development would do ecological harm.

With regard to staffing and advancement of staff within Parks Canada, we have observed that the ecological function and the ecological ethic are compartmentalized within the organization, effecting in a sense a “green ceiling.” There is a need for management to support and foster ecological integrity initiatives, allowing those who wish to remain in non-management roles to be effective in protecting ecological integrity. We heard or observed that:



- those with specific ecosystem-based management or science training rarely move to upper management;
- hiring or transfer of management staff from non-resource management backgrounds, who lack an expressed conservation ethic, has further developed this apparent green ceiling and created a barrier to the protection of ecological integrity at the ground level;
- there is a perception that educational and cultural barriers divide management from park staff and the science associated with conservation and ecological integrity;
- an employee's environmental commitment is seen as being outside of the job, radical or reactionary;
- employees with a strong conservation ethic feel a lack of congruency between their personal ethics and the ethics of the organization.

An optimal structure is one that grants ecological integrity a central role in every management decision, provides a depth of understanding and experience to issues involving ecological integrity, ensures that it is integrated within each

department, and co-ordinates tasks and involves all staff in achieving ecological integrity. If ecological integrity is everyone's job and individuals skilled in ecological protection are hired and promoted within Parks Canada, this ideal can be realized.

An organization that fully embraces ecosystem management and ecological integrity will require a range of new expertise. The following list of areas of required expertise comes from the Panel's observations:

- managers with experience and training in disciplines associated with ecological integrity;
- senior science positions from a range of disciplines;
- individuals with the capacity to manage the process of science from the generation of the research agenda through to dissemination of results;
- social science expertise in human use management;
- expertise in subsistence/resource harvesting activities in particular those associated with regulatory mechanisms;
- expertise in interpretation;
- expertise in data management, especially at the park level;
- expertise in working with naturalized (traditional ecological) knowledge and with mechanisms for integrating such knowledge into decision-making;
- skills and expertise in regional land use planning.

In addition, the Parks Canada workforce is aging; in 1997, approximately 60 per cent of the workforce was 40 or over, which presents the possibility of large numbers of staff retiring in a relatively short period of time. The need to hire many new staff will also offer the opportunity to improve the skills profile of Parks Canada.

**National parks staff often refer to their affinity for nature, their love of wild places.** J. Pleau/Parks Canada



## RECOMMENDATIONS

We do not feel that Parks Canada's existing structure serves ecological integrity well. We heard from park staff that they feel that the current organization does not support their fundamental beliefs about the importance of ecological integrity and that while tired of change, they would welcome changes that would move Parks Canada toward achieving its core purpose.

2-5. We recommend that Parks Canada examine and evaluate the existing structure and its implications for achieving ecological integrity requirements for national parks. In any structural reorganization we suggest the following guiding criteria be used to achieving the objectives required of ecological integrity:

- ensure that ecological integrity is central to everyone's job;
- ensure that Parks Canada is represented in regions, provinces and territories by senior parks representatives who can speak for the Parks Canada Agency in establishing agreements, partnerships, and policies in any given area;
- provide these senior representatives with the appropriate authority and professional staff that go along with the responsibility to accomplish their tasks;
- provide parks with enough staff to carry out their responsibility but at the same time ensure a co-ordination of those specialists that could work better as teams and provide leading-edge expertise to parks;
- ensure that an adequate focus in the Field Unit Superintendent's responsibilities and time is devoted to national parks;

- establish networks in discipline areas (similar to the Fire Management group) to parks;
- provide Service Centres with a clear definition of roles, responsibilities and authorities in specific fields;
- provide for clear accountability and recognition mechanisms for achieving ecological integrity.

The following recommendations arise from the need to redress existing staffing to provide a strong base for ecological integrity protection. As ecological integrity becomes central to the operations and decisions of Parks Canada, these actions may be reviewed and phased out.

2-6. We recommend that Parks Canada take steps associated with staffing and training to ensure that protecting ecological integrity becomes the primary concern of every person in the organization. Such steps include:

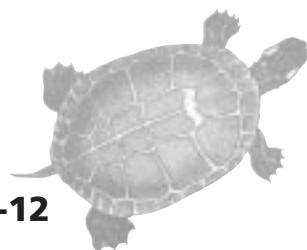
- use a demonstrated commitment to the mandate of protecting ecological integrity as a criterion for staffing throughout the organization;
- ensure that the majority of management positions are filled with persons skilled and trained in ecological integrity. Understanding of and experience with managing ecological integrity should be among the selection criteria for all senior managers. Senior management should also have a demonstrated prior commitment for the values of ecological integrity and national parks. In the short term, existing staffing should be examined, and training and transition strategies developed;

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*"I am not held accountable for ecological integrity. It never comes up."*

Field Unit Superintendent

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- create the position of National Science Advisor or Director General of Ecological Integrity. This position should be parallel to the position of Director General of National Parks and should report directly to the Chief Executive Officer. The person selected for the position should have proven expertise in ecosystem science and protected areas strategies, and would act as the scientific advisor to the Chief Executive Officer, be a member of the Executive Board, co-ordinate the overall national park science strategy, and manage a formal program of external outreach to universities and research agencies. We suggest the following criteria for this position:
  - at least at Master’s-level degree in a field related to ecological integrity, with an understanding of relevant social science areas;
  - experience in protected areas management and research;
  - national reputation in their field (in order to work credibly with senior science representatives from other government departments and to develop partnerships with universities and other researchers);
  - an understanding and appreciation of naturalized knowledge systems;
  - an understanding and appreciation of adaptive management;
  - the ability to develop a research agenda, to provide mechanisms to incorporate knowledge into decision-making.
- ensure there is adequate science advice at all decision-making forums in the organization, including park management teams and scientific advisors to the Directors General East and West and Executive Directors of Québec and the Mountain Parks.

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## Accountability

*Parks Canada is accountable for the application of, and adherence to, these [Guiding Principles and Operational Policies]. This accountability will be formally reviewed through State of the Parks reporting.*

Parks Canada, Guiding Principles and Operational Policies (1994)

Accountability can be defined as the act of being held both responsible and answerable for a given result.

At the national level, the State of the Parks Report is the accountability mechanism used to evaluate Parks Canada’s achievements. The State of the Parks Report is prepared periodically and tabled in Parliament but not reviewed by committee. At the park level, the key accountability mechanisms are the Park Management Plan

and the Business (Implementation) Plan.

The Panel examined the extent to which these or other accountability mechanisms were used to hold Field Unit and Park Superintendents (and other park staff) personally accountable for ecological integrity. We heard and observed that while senior managers are responsible for the ecological integrity priority, they are not held accountable for ecological integrity. No clear feedback mechanisms are associated with ecological integrity. For employees at all levels of the organization, the link between their jobs or responsibilities and ecological integrity is seldom apparent. This is in sharp contrast to accountability for other organizational objectives such as revenue generation, for which employees told us they were held accountable.



We heard or observed that:

- there is no direct individual accountability for ecological integrity (for example in performance evaluations at the Field Unit Superintendent level);
- ecological integrity is only one of a long list of accountabilities within Business Plans and it is often included as only a minor element;

- Parks Canada often “lumps” ecological integrity and commemorative integrity together in planning, management and other activities;
- accountability for ecological integrity within professional and technical service areas (and possibly within the Executive) appears to be absent;
- State of the Parks Reports, while an excellent beginning to public reporting, are not true accountability documents and lack rigour. (Chapters 3 and 6 contain further discussion regarding State of the Parks Reports.)

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## U.S. National Park Service Awards for Excellence in Natural Resource Stewardship

The U. S. National Park Service makes five awards each year to government employees who have provided outstanding accomplishments in natural resource stewardship activities, management or research. The awards foster creative and innovative practices and projects.

The awards are:

- The Director’s Award for Natural Resource Management;
- The Director’s Award for Natural Resource Research;
- The Director’s Award for Superintendent of the Year for Natural Resource Stewardship;
- The Resource Manager in a Small Park Award;
- The Excellence in Natural Resource Stewardship through Maintenance Award.

The National Park Service presents these awards at appropriate peer gatherings. In recent years, the Service has presented the awards to resource management and research personnel at scientific or conservation society meetings.

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Accountability for ecological integrity is a subject that is addressed in all chapters of this report. Recommendations regarding accountability are summarized below but are developed in more detail in the following chapters. We believe that the adaptive management process offers a viable mechanism to foster accountability at the same time as facilitating actions that support ecological integrity, with feedback and evaluation as integral parts of the process.

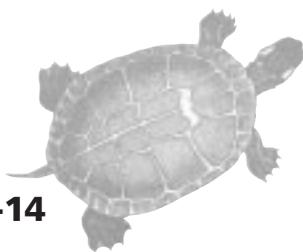
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## RECOMMENDATION

2-7. We recommend that Parks Canada improve accountability mechanisms within the organization to ensure progress toward the goal of protecting ecological integrity. Mechanisms include:

- revise and clarify accountability mechanisms at the park level. Specifically, we recommend that Parks Canada adopt new or revised accountability mechanisms such as park-level State of the Park Reports, budgeting and accounting principles, transparent decision-making processes, and other ideas developed in later sections of this report:

- use regular reporting mechanisms, evaluations, bonuses, raises, and awards to make all staff accountable for ecological integrity. Clarify the role and responsibility of all staff at all levels of the organization for implementation of ecological integrity, provide them with adequate professional support and hold them accountable for measurable results. Within a one-year time frame, institute an award program for excellence in work by park staff and partners towards ecological integrity.



## Politics and Parks Canada

Issues related to political input occur at two levels: actual political involvement in decision-making within Parks Canada; and “filtering.”

Parks Canada is a public agency reporting to a Minister of the Crown. Policy direction comes from Parliament, from

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*“I would like to see Parks Canada find the courage to cast itself in a more active, advocacy role in promoting ecological integrity... Of course, it’s nice to get along with everybody... But there is no point in ‘getting along’ if the ecological integrity of parks is going to suffer as a consequence. I don’t mean to imply that Parks Canada needs to become abrasive or belligerent. I think the organization can be courteous and sympathetic to all, and yet be unswerving, zealous, in pursuit of ecological integrity. It is not good enough for Parks Canada to assume a passive caretaker role. Our national parks desperately need an organization that’s willing to serve as a forceful and energetic advocate for the values of Canadian Heritage.”*

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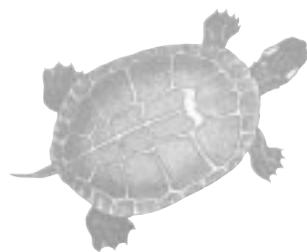
park neighbour, submission to the Panel

the Minister and from the federal government. Since 1988, policy direction for Parks Canada has been clear and consistent, establishing the primacy of protecting ecological integrity in national parks. The current Minister of Canadian Heritage has taken a number of decisive actions consistent with protecting ecological integrity, such as the implementation of many recommendations from the Banff-Bow Valley Study. The Parks Canada Agency is also a public

agency in the sense that its actions affect the public and the “affected public” may use its recourse to political means to influence decisions.

### Political Involvement in Decision-making

The Parks Canada Agency and the national parks under its jurisdiction are subject to direct involvement of politicians in activities ranging from new park establishment through to specific proposals within parks. The impact of political decisions on parks and on park management is significant as it signals interest and direction from political levels. In instances where political decisions are made that affect a national park or parks, clear explanations of decisions, and the rationale for these decisions, is needed in order to clarify decisions to park staff, create support and maintain direction.



### Filtering:

#### The Second-guessing Syndrome

“Filtering” occurs when decisions are made in anticipation of political concerns, or when information is edited or otherwise censored because of perceived political sensitivity. In other words, “the boss isn’t going to like this” becomes the paramount concern when actions are taken or information is passed on. This concern eclipses directness and openness. In so doing, staff at all levels, including senior management, deny their superiors the opportunity to evaluate all available information and make informed decisions.

The Panel has observed and heard that:

- filtering results in decisions or actions that are perceived to be contrary to the intent of the National Parks Act, policy or management plans;
- decisions are stalled as managers wait for what they perceive as “the right time”;
- information necessary for sound decision-making on the basis of protecting ecological integrity is filtered out of the information that goes up the chain of decision-making;
- despite the existence of such management tools as park zoning policies and environmental assessment requirements, park managers find it difficult to clearly say “no” to development or specific uses that threaten ecological integrity or to clearly change practices for fear of making an unpopular decision. This indecision results in tacit agreement and encourages future similar uses;
- a syndrome of compromise decisions that have significant cumulative negative impacts on ecological integrity has developed. Under this situation, park management becomes “the politics of compromise”;

- the difficult assessment of national imperatives contrasted with local interests is left without the proper policy base for managers to make appropriate decisions.

In the Panel’s opinion, a clear statement that reinforces protection of ecological integrity as the first priority of Parks Canada’s mandate will stimulate clear

and consistent decisions and provide guidance to staff, obviating “filtering” as a widespread practice at all levels of Parks Canada. Active discouragement of the practice will engender confidence among staff and allow free and open exchange of information and ideas. We encourage the Minister to request that Parks Canada staff “tell it like it is” as a matter of policy.

## RECOMMENDATION

2-8. At all levels of decision making, we recommend that Parks Canada adopt a transparent and open decision-making process including formal records of

decision and a strategy to communicate the rationale for decisions.

## Internal Debate and External Advocacy

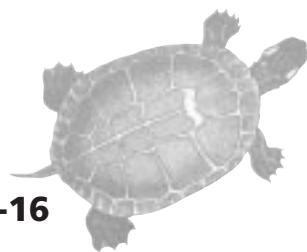
Issues regarding ecosystem-based management are complex and fraught with uncertainty. Dialogue and debate are key elements to addressing these challenges. However, we have found that the climate within Parks Canada is not conducive to either internal debate or public advocacy. The Panel defines advocacy as voicing, in a respectful but active way, the values and concerns of national parks.

It has always been difficult to judge the line that separates the appropriate behaviour of a public official from the actions of the same person as a private citizen. In advocating externally about the role and mandate of Parks Canada, employees should not have to become private persons in order to freely state their views. The Panel notes that where other federal government departments and public institutions have a clear sense of their mandate and their purpose, their officials have no hesitation in promoting that mandate. For example, officials of Natural Resources Canada and Industry Canada, do not hesitate to support the industries for

which they are responsible both within government and in public.

Specifically, we consistently heard that:

- there is no support, mechanism or forum for internal debate or critique — a necessity in a science-based organization — and there is informal suppression of internal debate regarding ecological integrity;
- challenging a management decision on the basis of protecting ecological integrity is perceived as “career threatening”;
- re-organization and budget cuts have severed communications and support networks, exacerbating the feeling of isolation;
- employees feel that to do their jobs and protect ecological integrity they must leak material to non-governmental organizations.



With regard to external advocacy we have heard that:

- while there are no formal barriers to external advocacy there are implicit barriers. Some senior staff and management are very uncomfortable with the notion of advocacy;
- while some parks have taken an active role in voicing the park's values and concerns to surrounding neighbours, other parks have either remained silent in the face of critical boundary issues or taken a passive approach. The credibility of Parks Canada as a voice for conservation is perceived to be threatened when Parks Canada is passive in voicing concerns;
- the lack of external advocacy is an area where employees find significant disconnection with the values of Parks Canada;
- Parks Canada staff perceive that land managers adjacent to national parks do not welcome Parks Canada advocacy for park values and concerns, particularly when this involves provincial counterparts;

- employees perceive that advocating even slightly controversial national park concerns outside park boundaries is also "career threatening" and such advocacy is strongly discouraged by senior managers.

This reluctance to speak out for park values is a widespread response to large developments, both inside and adjacent to parks, and to ongoing surrounding land use issues. Although there are significant notable exceptions, the norm is an organization that is reluctant to voice concerns regarding how surrounding land uses may threaten park values.

We think there is room between the current situation of near-silence and a situation of unbridled internal critique and external advocacy. That Parks Canada's employees are often its most severe critics is a healthy situation — internal debate and criticism is the best way for any organization to learn and grow. But that employees feel obliged to raise their criticisms obliquely rather than openly within the organization shows a lack of trust which must be addressed. An institution that encourages the competent expression of values and mandates will be stronger for demonstrating that support.

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## RECOMMENDATION

2-9. We recommend that Parks Canada open dialogue about the management and maintenance of ecological integrity by:

- giving staff guidelines, principles and tools that enable Parks Canada to open the dialogue on ecological integrity;
- allowing alternate views to be expressed in a professional manner and respected, as evidence of positive organizational change;

- making management accountable for creating a climate of openness, critique and internal advocacy;
- adopting the adaptive management process to facilitate this free exchange of opinions;
- affirming and communicating the recognition that advocacy on issues that affect parks is necessary and expected;
- clearly communicating corresponding policy direction and guidelines to all park staff.

