

FRIENDS OF THE RIDEAU

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Mr David Britton
Director
Ontario Waterways
Parks Canada
Peterborough ON

Dear Mr Britton,

I am writing to provide you with comments from Friends of the Rideau on the draft Parks Canada management plan 2021-2031 for the Rideau Canal National Historic Site. As you know, Friends of the Rideau is a volunteer-run organization, in existence for over 35 years, working to enhance and conserve the heritage and charm of the Rideau Canal. We are one of the original cooperating associations with Parks Canada.

We want to thank you and the members of your planning team for including Friends in the early 2018 consultations, and for the opportunity to have a conversation with you several weeks ago and share our views regarding the draft management plan. We recognize that the COVID 19 pandemic has severely constrained Parks Canada's ability to follow traditional patterns of consultation with stakeholders and partners. That said, we believe it is in Parks Canada's interest to have a full and transparent dialogue with all parties with an interest in the management of the Rideau Canal, including an opportunity to comment on a revised version of the draft management plan, that is a revised version of the draft we have based our present comments on. As noted below in this letter, Parks Canada's success in implementing the plan covering the next decade will depend on the degree to which it (Parks) can get buy-in and support from its partners and stakeholders.

Our overall comment is that the draft plan emphasizes operating the Rideau Canal for the benefit of the tourist industry and does not give the required attention to heritage, commemorative and ecological integrity. We believe that the introduction to the plan should include an overview of the state of commemorative integrity for the entire Rideau Canal system. The Rideau Canal is much more than a recreational waterway. We note the provision in the Parks Canada Act requiring the Agency to "...manage visitor use and tourism to ensure the maintenance of both ecological and commemorative integrity." Thus we would expect the lead priority in the management plan to be *Demonstrating Excellence in Sustainability, Protection and Presentation*.

In the draft plan, in the introduction to Key Strategy #2, reference is made to the World Heritage Site designation of the Rideau Canal as increasing public expectations of improved visitor experience, levels of service and heritage and natural conservation. We would argue that the UNESCO designation would increase Canadians' expectations that Parks Canada would strive to preserve and protect the Canal's commemorative integrity, but we do not see any such reference in the draft plan. As noted by Professor Christina Cameron (Ottawa Citizen, 24/8/2019), since 1979 commemorative integrity has been the guiding principle in Parks Canada's historic sites policy, however this is not mentioned in any of the objectives supporting Strategy #2. If projected financial resources to protect and promote commemorative integrity – and ecological integrity – on the Rideau Canal are insufficient, then the management plan should clearly say so.

The combination of built structures, historic landscapes and distinct ecological and environmental features that comprise the Rideau Canal present management challenges, without question. Compounding this complexity is the array of government jurisdictions with their many thematic and subject responsibilities, referred to by some researchers as a “jurisdictional quagmire.” Given the pressure of development all along the Canal, there has to be a way to manage the cumulative impact of these pressures so that negative consequences are minimized, consistent with the Provincial Planning Statement. This is especially important when it comes to protecting the many significant cultural heritage landscapes along the Rideau Canal. There is a very clear need for leadership by Parks Canada, both as convener of stakeholders/partners and administrators, and as manager of significant components of the waterway, to encourage creation of a shared vision for the Rideau Canal. Parks Canada cannot step away from this leadership role. We note that UNESCO/ICOMOS addressed this issue in the correspondence of November 2019, in terms we fully endorse.

Reference is made in section 3.0 to the Rideau Corridor Landscape Strategy of 2012. We do not have any comments to make about this initiative except to note that nine years after it was completed there are no tangible results/outcomes evident from that study.

Previous Rideau Canal management plans included references to supporting the efforts of private individuals, community groups and others in protecting the historic and natural features of the Canal. These statements were implemented through regular consultations and transparent communications, and Parks Canada’s leadership was greatly appreciated. The current, draft plan contains no commitments, beyond a general statement in objective 1.3 of Strategy #1 to meet annually and discuss new initiatives and opportunities. Similar to other sections of the draft plan, however, it is unclear what that means and which stakeholders would be involved. What about the shared responsibilities to preserve and protect commemorative and ecological integrity? Building trust, to assist with the compliance and enforcement activities referred to briefly in objective 3.1, would be an important action. Meaningful public engagement with public stakeholders and non-governmental groups such as Friends of the Rideau must be a commitment in the plan.

The context section of the management plan should set out the state of commemorative integrity of the Canal and the cultural resource management policy as it pertains to the site. This information would assist partners and stakeholders in understanding the objectives and actions planned by Parks Canada during the ten-year span of the plan. It would also create a baseline of information for an ongoing consultative process aimed at building consensus on actions that all Rideau Canal stakeholders should take to support commemorative and ecological integrity.

There is no reference in the draft plan to international obligations and responsibilities which Parks Canada, on behalf of the Canadian government, must meet. We have made reference above to the 2019 communication from UNESCO which reminded Canada (Parks Canada) of these obligations, which were agreed to when the Rideau Canal was proposed for World Heritage Site designation. It appears to a number of observers that UNESCO and its technical advisory agency ICOMOS are concerned Canada is not living up to these 2006-2007 commitments. The management plan should spell out actions to be taken to correct these variances.

Parks Canada has a very important role to play with respect to public education about the Rideau Canal. During the 15-year interval since the last management plan was issued, there has been a steady erosion of education and interpretation activities by Parks Canada, replaced by static displays (signage) at lock stations. Objective 1.2 states “Visitors are more engaged with the Canal.” This apparently will involve visitors enhancing their experience through (unspecified) “new and emerging technologies” (Objective 2.3). There is no reference to interpretation and public education. Friends of the Rideau’s experience, operating a visitor centre at The Depot in Merrickville, is that visitors want/need to be able to talk with interpretation staff in order to properly understand and appreciate the history and operation of the Canal. We note that the only pamphlet for visitors explaining the design and functioning of the locks on the Rideau system (*How a Lock Works*) was prepared by Friends of the Rideau for distribution by lock station staff. But it has been unavailable for two years and Parks Canada has not responded to a proposal from Friends to reprint. Finally, given the welcome increase in waterborne visitors to the Rideau Canal coming by canoe and kayak, it is interesting to note that the only paddling guide to the waterway has been prepared by a private individual (Ken W Watson). It is available free via Friends of the Rideau’s website. Objective 1.1 in the draft plan speaks about “a visitor offer targeting paddlers” developed by 2023. Why would that be necessary if it already exists and is by all accounts very popular?

Of concern to Friends of the Rideau are the references to increased revenue generation (objective 3.2, the introduction to Strategy #2, the introduction to Strategy #3). Does this mean that heritage is expected to pay for itself?

Friends supports the objective of reviewing and strengthening the statutory, regulatory and policy framework governing the Rideau canal. We would go further, however, and urge Parks Canada to enshrine updated historic canal regulations in legislation to ensure the fullest protection of cultural and natural resources.

We look forward to seeing a revised draft of the management plan, reflecting the comments and suggestions we and other interested parties have made. The dialogue possibilities will serve to enhance and improve the final product and create an environment of partnership where partners, stakeholders and interest groups will feel a sense of ownership and will work with Parks Canada to achieve the shared objectives the plan should contain.

Yours sincerely,

Hunter McGill
Chairman
Friends of the Rideau

Cc Christoph Rivest, ICOMOS Canada
Director, Culture Sector, World Heritage Centre, UNESCO