

June 15, 2026

**To:** Federal Consultation Team, Privy Council Office, [engagement@pco-bcp.gc.ca](mailto:engagement@pco-bcp.gc.ca)

**Cc:** The Honourable Julie Dabrusin, Minister of the Environment, Climate Change and Nature, [ministre-minister@ec.gc.ca](mailto:ministre-minister@ec.gc.ca)

***Re: Getting Major Projects Built in Canada – Discussion Paper on Proposed Legislative, Regulatory, and Policy Reforms***

To the Federal Consultation Team,

BC Nature appreciates the opportunity to provide comments on the federal government's discussion paper, *Getting Major Projects Built in Canada*. BC Nature recognizes the importance of effective, timely, and well-coordinated decision-making for major projects. However, we are deeply concerned that several proposals outlined in the discussion paper could further weaken already limited environmental safeguards, reduce meaningful public and Indigenous participation, and place species at risk, sensitive habitats, and ecosystems under increased pressure.

While the proposed changes would affect ecosystems across Canada, BC Nature's comments focus on British Columbia, where our federation, as well as each of our 66 member organizations, has long worked to protect, understand, and appreciate the province's biodiversity.

British Columbia contains some of Canada's most biologically rich and vulnerable ecosystems, including the Salish Sea, Fraser River estuary, coastal old-growth forests, Garry oak ecosystems, wetlands, grasslands, coastal meadows, salmon-bearing rivers, and migratory bird habitats. These ecosystems support many species listed under the federal Species at Risk Act, including the Southern Resident Killer Whale, Northern Spotted Owl, Marbled Murrelet, Barn Owl, Western Painted Turtle, White Sturgeon, White Meconella (a poppy), Bearded Owl-clover, Seaside Centipede Lichen, and many other species already facing serious cumulative pressures.

In spite of profoundly positive global environmental policies, Canada's existing legal and policy tools have not been sufficient to slow the decline of many species at risk or the ongoing loss and fragmentation of habitats. The Species at Risk Act should not be treated as a complete or adequate safeguard, nor should it be ignored. Many species and habitats remain at risk despite existing legislation. Exemptions, rushed approvals, or reduced assessment requirements could weaken an already imperfect system.

Extinction is not a reasonable trade-off for faster approvals. Once a species is lost, it cannot be recovered through permit conditions, offsets, or future mitigation measures. In British Columbia, many species at risk depend on habitat already fragmented, degraded, or under increased development pressure. Federal decision-making must

therefore strengthen-not weaken- environmental review, cumulative effects analysis, transparency, Indigenous participation, and habitat protection.

BC Nature is concerned that proposals to compress impact assessments into a one-year timeline, remove separate federal impact assessments for some categories of projects, pre-approve development in designated economic zones, or allow exemptions from species-at-risk requirements could result in projects that increase pressure on already vulnerable species and habitats.

While a rigid timeline may appear efficient administratively, it may not be ecologically appropriate. Many impacts to wildlife, plants, fungi, lichens, mosses, and habitat cannot be understood without long-term ecological data, including seasonal surveys, cumulative effects analysis, Indigenous knowledge, and public input.

For example, assessing impacts on migratory birds, salmon-bearing waters, wetlands, marine mammals, old-growth-dependent species, rare plants, lichens, fungi, mosses, and other species at risk often requires careful consideration of breeding seasons, migration timing, spawning cycles, habitat connectivity, prey availability, hydrology, soil conditions, host trees, moisture patterns, vessel traffic, noise, contaminants, climate impacts, and cumulative effects. These factors cannot always be properly assessed within a compressed review period.

Impact assessments are not red tape. They are an essential public-interest tool that helps ensure major project decisions are transparent, science-based, and informed by Indigenous knowledge, public participation, and independent evidence. Strong assessments also help proponents identify concerns early, avoid sensitive habitats, redesign projects to reduce harm, and build public trust. They reduce the likelihood of unintended negative consequences to our collective future.

BC Nature is further concerned that proposals related to Federal Economic Zones or pre-approved development areas could result in broad decisions being made before the full ecological consequences of specific projects are better assessed. British Columbia's landscapes and waters are highly diverse. A project's impact depends not only on its category, but on its precise location, timing, design, cumulative context, and relationship to surrounding ecosystems. Project-specific environmental review remains essential, and pressure must be applied on project proponents to deliver adequate and credible analysis of potential project impacts.

While full consensus may not be reached, BC Nature believes that decisions about which major projects are prioritized, planned, and advanced should be subject to a democratic and transparent process that allows the public, Indigenous nations, scientists, local communities, and affected stakeholders to understand and compare the social, economic, environmental, and cultural benefits and costs of multiple project options before projects move too far through the approval process. Canadians should have a stronger voice not only in how individual projects are assessed, but also in what kinds of

major projects are considered to be in the public interest, why they are needed, where they should occur, when they should proceed, and how alternatives have been evaluated. Both short-term and long-term impacts require attention. For example, decisions about continued fossil fuel expansion versus greater investment in renewable energy, habitat restoration, conservation, and climate-resilient infrastructure should be informed by independent science, Indigenous knowledge, cumulative effects analysis, climate commitments, biodiversity protection, and the public interest.

In summary, BC Nature respectfully recommends that the federal government:

1. Ensure that efforts to accelerate major project approvals do not further weaken already limited protections for species at risk, sensitive habitats, or ecosystems.
2. Maintain meaningful, independent, project-specific federal impact assessments for major projects, coordinated with the BC provincial government, that may affect species at risk, critical habitat, migratory birds, rare plants, fungi, lichens, mosses, wetlands, rivers, estuaries, shorelines, old-growth forests, marine ecosystems, or Indigenous rights.
3. Avoid rigid one-year assessment timelines in cases where additional time is required for seasonal wildlife surveys, rare plant or lichen surveys, cumulative effects analysis, Indigenous consultation, public participation, or scientific review.
4. Ensure that species-at-risk requirements are not bypassed, exempted, or weakened where a project could cause serious harm to a listed species, its habitat, or its recovery.
5. Require cumulative effects analysis so that projects respect connectivity in space and time and are not assessed in isolation from existing pressures such as habitat loss, climate change, pollution, industrial development, forestry, vessel traffic, roads, shoreline modification, invasive species, and hydrological change.
6. Require meaningful alternatives analysis, including whether a project can be redesigned, relocated, scaled differently, delayed, or modified to avoid impacts to species at risk and sensitive habitat.
7. Ensure that Federal Economic Zones or pre-approved project areas do not bypass project-specific environmental review or reduce protections for species at risk, sensitive ecosystems, or Indigenous rights.
8. Create a meaningful upfront public and Indigenous consultation process for determining which major projects are prioritized, why they are needed, where they should occur, and whether alternative approaches would better serve the public interest.
9. Require decision-making on major project priorities to compare the social, economic, environmental, and cultural benefits and costs of multiple options, including both short-term and long-term impacts.
10. Keep environmental decision-making transparent, science-based, publicly accountable, and grounded in biodiversity protection, climate responsibility, Indigenous rights, cumulative effects analysis, and the long-term public interest.

11. Improve efficiency by strengthening early planning, intergovernmental coordination, data sharing, clear information requirements, and early identification of sensitive habitats, rather than weakening environmental laws or reducing public oversight.

The federal government has a responsibility to ensure that major projects proceed only when they can be assessed responsibly, transparently, and without undermining Canada's commitments to biodiversity protection, climate responsibility, Indigenous rights, and species recovery.

BC Nature supports timely and effective decision-making, but expedited decisions must not compromise our future; we must do the right thing. The door must be open for the Prime Minister to hear those who speak for nature.

We urge the federal government to maintain meaningful impact assessments, protect species and habitats from further harm, and ensure that efforts to accelerate project approvals do not place British Columbia's most vulnerable species and ecosystems at greater risk.

Sincerely,

A handwritten signature in black ink, appearing to read "Harold Sellers".

Harold Sellers  
President  
BC Nature  
(Federation of British Columbia Naturalists)