



***Submission to The Government of Canada regarding
“Getting Major Projects Built in Canada – Discussion Paper on Proposed Legislative,
Regulatory and Policy Reforms”***

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***by
Seniors for Climate Action Now!***

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Seniors in Canada represent a growing percentage of the population. As older Canadians, we are confronted with a troubling realization: for the first time in recent history, we may leave our children, grandchildren and great-grandchildren less than what was bequeathed to us. Polluted air, soil and water; accelerating climate change; biodiversity loss; worsening floods, droughts and wildfires; and growing ecological instability are becoming defining features of the world that future generations will inherit.

In this context, if Canada truly wishes to be a global leader, it should be strengthening environmental protections and climate action, not weakening them as with the federal government's "[Getting Major Projects Built in Canada](#) – Discussion Paper on Proposed Legislative, Regulatory and Policy Reforms," that proposes significant changes to environmental assessment, regulatory review and project approval processes.

Respected environmental organizations have described these proposals as "a wholesale shredding of Canada's environmental safety net" (West Coast Environmental Law) and "the unwarranted evisceration of important legislative safeguards that protect navigable waters, marine environments, fish and fish habitat, and species at risk" (Canadian Environmental Law Association). A Québec coalition of over 20 environmental and civil organizations points out that "behind the slogans about speed and efficiency is the dismantling of the protections built over decades to protect the population, the water we drink, the air we breathe, the species that disappear and the natural environments on which our health and quality of life depend". Presented as "mere procedural reforms" the proposals substantially weaken key legal provisions that prevent environmental harm (Ecojustice) and, if approved, "will take Canada back to a more dangerous, toxic and destructive time and leave Canadians facing impacts that could last for generations"(Environmental Defence).

SCAN! shares these overarching concerns.

The Discussion Paper poses three questions for public and Indigenous engagement. These questions are framed by the assumption that the proposed changes will improve existing processes and increase efficiency. SCAN does not accept this assumption. The proposed consultation also largely excludes discussion of whether the proposed reforms are desirable, necessary, or in the public interest, which are crucial aspects. We also have additional concerns arising from our own perspective as seniors committed to intergenerational responsibility.

1. Weakening environmental and climate safeguards

SCAN members are deeply concerned that the proposed reforms would weaken environmental laws and assessment processes that help protect Canada's air, water, forests, biodiversity and climate. These safeguards were not created arbitrarily; they were developed over decades in response to hard lessons about pollution, habitat destruction, species loss and the long-term costs of poorly planned development. They exist to ensure that major projects are evaluated not only for their economic benefits but also for their environmental consequences.

Environmental organizations have warned that the proposed changes would reduce scrutiny of environmental impacts, create exemptions from existing safeguards, and weaken the assessment of cumulative impacts on ecosystems and greenhouse gas emissions. Canada, like most countries, has committed to reducing emissions, and scientific evidence makes clear that continued expansion of high-emitting activities will make those goals more difficult and costly to achieve.

Canadians are already experiencing the consequences of a warming climate through increasingly severe wildfires, floods, droughts, heat waves and storms. These events threaten public health, infrastructure, food security and ecosystems, and impose enormous costs on communities, governments, businesses and families. Biodiversity is declining, species are under increasing pressure, and natural systems that provide clean water, flood protection and other essential services are becoming less resilient.

Strong environmental assessment and regulatory processes help identify risks, encourage better project design, and ensure that environmental costs are not transferred to the public or to future generations. From SCAN's perspective, responsible stewardship requires strengthening our capacity to assess and manage environmental risks, not reducing it.

2. Failing the test of intergenerational equity

SCAN also approaches this consultation from a perspective of intergenerational responsibility. We have benefited from the natural wealth, relative climate stability and democratic institutions built and preserved by previous generations. We have a responsibility to pass on to future generations a country that is at least as healthy, prosperous and resilient as the one we inherited. The decisions made today about major projects, environmental protections and climate policy will shape Canada for decades to come.

The Discussion Paper places considerable emphasis on speed, competitiveness and economic growth. SCAN believes that major project decisions must also be evaluated through the lens of intergenerational equity – whether today's choices leave future generations better off, worse off, or burdened with unfair costs they did not choose.

SCAN is particularly concerned about policies that prioritize short-term gains over long-term stewardship. Climate change, biodiversity loss and ecosystem degradation are cumulative challenges whose consequences will be borne disproportionately by younger Canadians and those yet to be born. Public policy should be guided by the principle that each generation has a responsibility to pass on a healthy environment, a stable climate and strong public institutions.

3. Questioning the vision of prosperity underlying the proposals

Beyond concerns about environmental protection and democratic accountability, SCAN questions the vision of prosperity embedded in the Discussion Paper. The document implies that accelerating resource extraction and major industrial projects will necessarily improve prosperity and strengthen Canada's future. This assumption deserves careful scrutiny.

SCAN does not accept a narrow definition of prosperity measured by GDP growth, or by resource extraction, exports, or the speed at which projects are approved. A genuinely prosperous and stable society is one in which citizens enjoy economic security, affordable housing, quality health care and education, strong communities, a healthy environment, democratic participation. Success is not measured by the number of projects approved or the speed at which approvals are granted: it is whether our children and grandchildren inherit a society that is prosperous, equitable, environmentally sustainable and resilient. Future generations deserve nothing less. The vision presented in this Discussion Paper does not meet that test.

4. Eroding Indigenous rights, public participation and democratic accountability

SCAN is concerned that the proposed accelerated approval processes reduces opportunities for meaningful participation by local communities, Indigenous Peoples, civil society organizations and the broader public. Strong democratic institutions depend on transparency, independent review and meaningful consultation. Environmental assessment processes exist not only to evaluate technical and environmental impacts, but also to ensure that those affected by major projects have a meaningful opportunity to be heard before decisions are made.

Concentrating authority in political decision-makers while reducing opportunities for public scrutiny can weaken both accountability and public confidence. Reforms that limit public consultation or constrain the constitutionally based right of Indigenous Peoples to participate fully in decision-making raise concerns about Canada's commitments to democracy and Indigenous rights.

Public participation often improves project outcomes by identifying local knowledge, potential risks and practical solutions that might otherwise be missed. When communities feel excluded from decisions that affect them, trust is undermined and conflict becomes more likely. Meaningful public participation and respect of Indigenous rights are not obstacles to progress; they are essential conditions for legitimate, durable and socially accepted decision-making.

5. Creating greater conflict and uncertainty rather than greater efficiency

Although the stated objective of the reforms is to accelerate project approvals, weakening environmental reviews and consultation processes could have the opposite effect. Projects that fail to adequately address environmental concerns, Indigenous rights or community impacts are more likely to face public opposition, legal challenges and prolonged conflict. Strong environmental safeguards, meaningful consultation and public trust are not barriers to development; they are essential foundations for projects that can proceed successfully and withstand future scrutiny.

Concluding remarks

SCAN supports and endorses the concerns raised by organizations including the Canadian Environmental Law Association (CELA), Ecojustice, West Coast Environmental Law, Climate Action Network Canada, Environmental Defence, and a Québec coalition of environmental and civil organizations including Équiterre, CQDE and Mères au front. They

have identified major risks associated with the proposed reforms and challenged the assumption that reducing environmental safeguards will produce better outcomes for Canadians.

During the federal election a year ago, Prime Minister Carney promised to protect the environment and uphold Canada's core values. The direction outlined in this Discussion Paper moves Canada away from those commitments. Environmental stewardship, climate responsibility, democratic accountability and respect for Indigenous rights are not obstacles to prosperity; they are essential foundations for a resilient and sustainable future.

As seniors, we urge the federal government to avoid reforms that weaken environmental protections, diminish Indigenous rights, reduce public participation, or prioritize short-term economic gains over long-term public well-being.

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Seniors for Climate Action Now! (SCAN!) is building a pan-Canadian seniors' climate action movement for the benefit of generations to come. We are working with youth and other climate activists to create a democratic, just, and transformative movement to address the climate crisis.

<https://seniorsforclimateactionnow.org/>