October 5, 2026

The Right Honourable Mark Carney, Prime Minister of Canada
The Honourable Julie Dabrusin, Minister of Environment, Climate Change and Nature
The Honorable Nathalie Provost, Secretary of State (Nature)
Canada's Head of Delegation to CBD COP17 and official representatives

cc.
- The Honorable Rebecca Alty, Minister of Crown-Indigenous Relations
- Ms. Astrid Schomaker, Executive Secretary of the Convention on Biological Diversity (CBD)
- Ms. Shannon Miedema, Chair, Mr. Ellis Ross and Mr. Patrick Bonin, Vice-chairs, House of Commons Standing Committee on Environment and Sustainable Development
- Ms. Mary Coyle, Chair, Ms. Josée Verner, Deputy Chair, Standing Senate Committee on Energy, the Environment and Natural Resources

Re: Stop dismantling environmental protections and renew Canada's commitment to the KMGBF 2030 targets at CDB COP 17

Dear Prime Minister, Minister Dabrusin, Secretary of State Provost, and members of Canada's Convention on Biological Diversity COP17 delegation:

Biodiversity is declining at an unprecedented rate in human history. In December 2022, Canada hosted the Convention on Biological Diversity's COP15 in Montreal and helped secure the Kunming-Montreal Global Biodiversity Framework (KMGBF), joining 195 other countries in committing to 23 targets for halting and reversing biodiversity loss by 2030. This October, Canada will arrive in Yerevan for COP17 and the first Global Review of collective progress against that Framework.

We, the undersigned, are writing because Canada will arrive at that review having spent the past eighteen months weakening and dismantling the legal protections and institutional capacity that the commitments of this Framework depend on. We urge the federal government to reverse course and ask the official representatives to CBD COP17 to renew Canada's commitment to the KMGBF 2030 targets.

Canada is already off track for Target 3 – Conserve 30% of Land, Water and Seas

By the government's own reporting, Canada has conserved only 13.8% of its territory to date, against the KMGBF's 30% target for 2030.

Canada is legislating its way out of its own commitments (Target 4 – Halt species extinction)

KMGBF's target 4 calls for taking actions to halt human-induced extinctions by 2030 and reducing extinction risk, in particular for threatened species. The federal government has recently adopted legislation that clearly conflicts with this target.

The Building Canada Act (2025) now permits Cabinet to designate projects as "in the national interest" and exempt them from federal statutes including the *Species at Risk Act*, the *Fisheries Act*, the *Migratory Birds Convention Act* and the *Impact Assessment Act*.

Disregard for the protection of biodiversity is also reflected in the adoption of amendments to the Red Tape Reduction Act, passed through Budget Bill C-15 last spring. These grant ministers sweeping discretionary powers to exempt an individual, a corporation, a province, or the federal government itself from Acts of Parliament, including the four acts mentioned above and the *Environmental Protection Act*.

More recently, the government tabled, on September 21st 2026, Bill C-39 *Building Canada Strong Act.* This omnibus bill proposes to amend several important laws related to hard-won environmental protections, including the *Impact Assessment Act*, the *Canadian Energy Regulator Act*, the *Canadian Environmental Protection* Act, the *Fisheries Act,* and the *Species at Risk Act*. It also extends the problematic discretionary exemption provisions and accelerated approval processes of the Building Canada Act (2025), discussed above, to projects within "regions of national interest". The power to designate any area in the country as such would rest in the hands of Prime minister Carney and his cabinet, another attempt at giving them discretionary power to override environmental protections in the name of short-term economic gain.

Budget Bill C-15 (2026) also narrowed the Competition Act's anti-greenwashing provisions, by removing the requirement that environmental claims, such as net-zero claims from the fossil fuel industries, be substantiated against internationally recognized methodology. By contrast, parties to the KMGBF had agreed to take measures to encourage businesses to transparently disclose impacts on biodiversity and provide relevant information to consumers (Target 15).

Meanwhile, Bill C-73, the Nature Accountability Act, which aimed to establish a transparency and accountability framework for the federal government in fulfilling its KMGBF and related CBD commitments, died when Parliament was prorogued in January 2025 and has never been reintroduced. Canada has no binding domestic obligation to meet its KMGBF commitments.

Science-based protection is being subordinated to economic discretion (Targets 7 and 8)

Target 7 asks Canada to halve pesticide risk and work towards eliminating plastic pollution by 2030. However, amendments to the Pest Control Products Act adopted through omnibus Bill C-30 in June 2026 now allow Cabinet to authorize a pesticide even when the Minister of Health has found its environmental risks unacceptable, where Cabinet judges it necessary for economic or food security — terms the legislation does not define. A companion bill, C-31, still before Parliament, would replace mandatory 15-year re-evaluations of registered pesticides with a discretionary risk-based oversight assessment. The government also moved in December 2025 to repeal the single-use plastics export ban days after it took effect, for economic reasons.

Target 8 asks Parties to minimize the impact of climate change on biodiversity, including action to reduce greenhouse gas emissions. Yet since April 2025 Canada has dismantled most of its climate policy architecture — carbon pricing, the emissions cap, clean electricity regulations, the EV mandate — while fast-tracking new pipeline and LNG projects. The Canadian Climate Institute says net zero by 2050 is now "well out of reach."

Investment has been announced; capacity has been cut

In March 2026 the government launched A Force of Nature, committing $3.8 billion over five years to implement Canada's 2030 Nature Strategy, its roadmap for delivering the Framework at home. This is a real commitment, and we acknowledge it, particularly its support for Indigenous-led conservation and the Seal River Watershed. But a headline figure is not the same as capacity, and the strategy consolidates programs in ways that seem to obscure reductions within it.

However, eighteen days before that announcement, Environment and Climate Change Canada published its 2026–27 Departmental Plan. The plan sets out deliberate reductions of $236.8 million this year, rising to $282.6 million by 2028–29, and states these cuts will mean roughly 837 fewer full-time positions by 2028–29. In addition, lack of support by ECCC and the insufficient funding of the Committee on the Status of Endangered Wildlife in Canada— which must assess a species before it can receive any legal protection — have been highlighted by the Standing Senate Committee on Energy, the Environment and Natural Resources . They state that this will likely "lead to fewer assessments and timely reassessments, a growing backlog, and slower implementation of Canada's biodiversity commitments".

Providing subsidies to fossil fuels rather than eliminating incentives harmful to biodiversity (Target 18)

Domestically, Target 18 commits to eliminating incentives harmful to biodiversity, whereas the federal government provided $10.2 billion in fossil fuel subsidies and public financing in 2025 alone and created two new fossil fuel subsidies in the 2026 Spring Economic Update.

We, the undersigned, urge the federal government and Canadian delegates to CBD COP 17 to renew Canada's commitment to the KMGBF as initially agreed, and set out an expedited timeline for achieving the 2030 KMGBF targets.

Canada asked the world to adopt this Framework in 2022. We ask Canada to honour its own commitments under it.

We also ask the federal government to reverse course on the measures mentioned above that contradict its KMGBF commitments for 2030 and beyond. We ask that it give biodiversity and environmental protections the weight they deserve in its decisions.

Respectfully,

Action Climat Outaouais
Amis de l'environnement de Brandon
BurlingtonGreen Environmental Association
Calgary Climate Hub Association
Canadian Association of Physicians for the Environment (CAPE /ACME)
Climate Action for Lifelong Learners (CALL)

ClimateFast
Climate Justice Saskatoon
Climate Reality Project Canada
Climate Action Network - Réseau action climat Canada
Council of Canadians
Ecojustice
Environmental Defence Canada
First Things First Okanagan
Fondation Rivières
Front commun pour la transition énergétique
Grand(m)others Act to Save the Planet (GASP)
Grand River Environmental Network (GREN)
Greenpeace Canada
Greys for Green
Mères au front
Nature Canada
Regroupement national des conseils régionaux de l'environnement du Québec
Regroupement Vigilance Énergie Québec
Seniors For Climate – Canada
Seniors for Climate Action Now! Aînés pour l'action climatique urgente! (SCAN! / AACU!)
Shake Up The Establishment
Sierra Club Canada
Southern Alberta Group for the Environment (SAGE)
Toronto350
Water Watchers
Zero Waste BC