

Report

A CANADA WORTH BUILDING PUTS NATURE UP FRONT



Nature is foundational to our identity as Canadians. From the food we eat, the water we drink, the air we breathe, to the natural resources that sustain our economy, Canadians rely on our natural environments in our daily lives.



Acronyms and Abbreviations

AAFC	Agriculture and Agri-Food Canada
CETA	Canada-European Union Comprehensive Economic and Trade Agreement
CoE	Census of Environment
DFO	Fisheries and Oceans Canada
ECCC	Environment and Climate Change Canada
ENGO	Environmental non-governmental organization
FPT	Federal-Provincial-Territorial
GDP	Gross Domestic Product
HC	Health Canada
HEA	Habitat Equivalency Analysis
IPCA	Indigenous Protected and Conserved Area
IUCN	International Union for Conservation of Nature
KBA	Key Biodiversity Area
KMGBF	Kunming-Montreal Global Biodiversity Framework
MPA	Marine Protected Area
MPO	Major Projects Office
NMCA	National Marine Conservation Area
NRCan	Natural Resources Canada
OECM	Other Effective area-based Conservation Measures
PC	Parks Canada
StatCan	Statistics Canada
TC	Transport Canada
UN	United Nations



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Executive Summary

Nature is foundational to our identity as Canadians. From the food we eat, the water we drink, the air we breathe, to the natural resources that sustain our economy, Canadians rely on our natural environments in our daily lives. Nature Canada welcomes *A Force of Nature: Canada's Strategy to Protect Nature* and its commitment to invest \$3.8 billion over the next five years (2026-2031).

However, recent legislative developments endanger this commitment, especially through discussion papers submitted by the Major Projects Office. The shift toward environmental deregulation and deprioritization jeopardizes Canada's commitment to a sustainable and habitable future.

In the words of Prime Minister Mark Carney, "When we fail to protect nature, we are not making a sound economic choice. We are making a choice that works against us."

ENGOs want to be a part of the solution and have expertise to offer. Therefore, this report proposes solutions to ensure the effective execution of *A Force of Nature* in a nature-positive way.

At its core, this report calls for a whole-of-government approach that puts nature up front in Canada's economic and infrastructure decisions. Our recommendations focus on five priorities: strengthening federal leadership on nature; applying an avoidance-first Mitigation Hierarchy; supporting Indigenous-led conservation; improving the science, data, and spatial planning that inform decisions; and ensuring the value of nature is reflected in economic decision-making. Together, these measures would help Canada build better and with greater certainty, while protecting the natural systems on which our economy and communities depend.

We recommend that the federal government take the following actions to ensure a thriving and nature-positive future for Canada:

High-Level Governance

- Re-establish a **dedicated senior policy role in the Prime Minister's Office** with expertise in environment
- Convene **annual federal-provincial-territorial meetings** on nature
- Ratify the **Agreement on Marine Biological Diversity of Areas Beyond National Jurisdiction (BBNJ Agreement)**
- Amend the *Canadian Environmental Protection Act* to include a **legally binding 'non-regression' principle**
- Negotiate additional **Nature Agreements** with the provinces and territories
- Develop and fund a **National Restoration Strategy**
- Scale investment in nature from the private sector by adopting the recommendations of **Canada's Nature Advantage**



Mitigation Hierarchy and Policy Integration

- Apply a **whole-of-government Mitigation Hierarchy** policy
- Require project proponents to use **Mitigation Hierarchy and risk assessments in early project reviews**
- Integrate the Mitigation Hierarchy into the **Cabinet Directive on Regulatory Efficiency for Clean Growth Projects** and the **Economic, Climate, and Nature Lens**
- Require **risk assessments and Mitigation Hierarchy sequencing before designation under the *Building Canada Act***
- Adopt **DFO's Habitat Equivalency Analysis** methodology for offsetting habitat loss
- Ensure sound ecological assessments by coordinating efforts between **ECCC, DFO, MPO, and project proponents**

Indigenous Leadership

- **Permanently fund Indigenous Guardians** programs
- Develop an **offset-in-lieu scheme** that funds Indigenous-led conservation
- Action on the **Arctic Indigenous Guardians Program**

Data & Spatial Planning

- Establish a **Head of Environment Data** within a central agency
- **Identify critical habitat and key biodiversity areas** through mapping initiatives
- Action on **new protected and conserved areas**

Nature Valuation

- Expand the scope of **Census of Environment** as a prerequisite for nature valuation
- Publish a **standardized methodology for nature valuation**



Introduction

Context

Nature is foundational to our identity as Canadians. From the food we eat, the water we drink, the air we breathe, to the natural resources that sustain our economy, Canadians rely on our natural environments in our daily lives. Nature fulfills our physiological, recreational, spiritual, and economic needs. Nature underpins our economy, and without it, we are placing our livelihoods in jeopardy. In fact, 73% of Canadians believe protecting nature is essential to ensuring the country's long-term prosperity (EKOS, 2026). For all these reasons, protecting nature is crucial to safeguarding Canada for current and future generations. Thus, federal leadership on protecting and restoring nature is more critical than ever.

Canada acknowledged this when it adopted the the international Convention on Biological Diversity's Kunming-Montreal Global Biodiversity Framework (KMGBF) and presented [Canada's 2030 Nature Strategy: Halting and Reversing Biodiversity Loss in Canada](#) in 2024. The *2030 Nature Strategy* is Canada's National Biodiversity Strategy and Action Plan in fulfilment of our legal obligations to the Convention on Biological Diversity. Following the KMGBF's framework, Canada's Nature Strategy sets out a shared vision and roadmap for halting and reversing biodiversity loss with . As federal policy, Canada's actions ought to reflect this commitment.

On March 31, 2026, the Carney Ministry announced *A Force of Nature: Canada's Strategy to Protect Nature* and a commitment to invest \$3.8 billion over the next five years (2026-2031). *A Force of Nature* commits to investing in Indigenous-led conservation, supporting species at risk and protected areas, upholding environmentally responsible development, and accounting for nature's value. Environmental non-governmental organizations (ENGOS) across Canada celebrated this funding. This historic financial commitment is a major step toward halting and reversing biodiversity loss and establishes the nation as a global environmental leader.

This report outlines a path forward for implementing *A Force of Nature* and explains how recent developments risk undermining the Government's \$3.8 billion investment.

The Problem

Thirty-eight days after the funding announcement, the federal government published *Getting Major Projects Built in Canada - Discussion Paper on Proposed Legislative, Regulatory, and Policy Reforms* ('Discussion Paper'). The Discussion Paper follows royal assent of Bill C-5 in June 2025, the *One Canadian Economy Act* (which includes the *Building Canada Act*), as well as the creation of the Major Projects Office (MPO) in August 2025.

The Discussion Paper came as a surprise. By proposing shortened federal project reviews, a single Crown consultation process, single project authorities, exemptions for specific projects



from the *Species At Risk Act*'s jeopardy clause¹, and the establishment of Federal Economic Zones², it ultimately frames nature as 'red tape' to the ultimate goal of building new infrastructure and development projects. *Getting Major Projects Built in Canada* is not just bad for nature, but it is also bad for business; when corporations cause harm to the environment, they risk severely damaging their reputations and creating major uncertainties through litigation and social dissent.

Moreover, major amendments to the *Pest Control Products Act* were passed through Bill C-30 before Parliament rose for the summer. These amendments allow Cabinet to authorize the use of prohibited pesticides if it considers it necessary to protect national economic security or national food security. Twenty concerned scientists submitted a letter outlining the dangers of these statutory changes (Morrissey et al., 2026). Historically, Canadian pesticide regulation was based on detailed risk assessments and thorough scientific review of toxicity to human health and non-target species. Scientists argue that these amendments disregard robust scientific evidence and severely undermine the value of scientific research in federal decision-making. This could endanger federal science-based processes and legislation, such as environmental impact assessment and the *Species at Risk Act*.

Additionally, deep budget cuts and workforce adjustments have significantly reduced critical environmental programs at Environment and Climate Change Canada (ECCC) and Fisheries and Oceans Canada (DFO), such as reforestation programs, species at risk programs, and marine conservation programs (SeaBlue Canada, 2026). Many of these programs contribute to advancing restoration in Canada, a key missing component from *A Force of Nature*. These program reductions compound with the scheduled expiration, closure, or phase out of various initiatives under the 2030 Nature Strategy (summarized in Appendix 1), weakening Canada's capacity to achieve climate and biodiversity goals.

Together, the shift toward environmental deregulation and deprioritization, and a growing focus on speed instead of effectiveness and certainty, undermines and jeopardizes Canada's ability to meet its 2030 targets under the *Kunming-Montreal Global Biodiversity Framework* (KMGBF). In the words of Prime Minister Mark Carney, "When we fail to protect nature, we are not making a sound economic choice. We are making a choice that works against us."

¹ A safeguard in which a minister may only enter into agreement with a person, or issue a permit to a person, if the activity in question will not jeopardize the survival or the recovery of the threatened or endangered species (*Species at Risk Act*, 2002, s. 73(3)(c)).

² Zones where the Government could "pre-approve" certain developments, and exempt these projects from individual environmental assessments and certain environmental legislation.

Kunming-Montreal Global Biodiversity Framework

The KMGBF is an international framework that was adopted during the 15th Conference of the Parties to the **United Nations (UN) Convention of Biological Diversity**. This framework sets out a pathway to **living in harmony with nature by 2050**, and supports the achievement of the **Sustainable Development Goals**. Included in this framework are 23 targets to achieve by 2030 and four goals to achieve by 2050.

The 23 targets outline a mission toward reducing threats to biodiversity, sustainably meeting people's needs, benefit-sharing, and promoting tools and solutions for implementing and mainstreaming biodiversity. The four goals outline a vision toward protecting and restoring nature, prospering with nature, sharing benefits fairly, and investing and collaborating to implement the framework.

In addition to jeopardizing our ability to meet our international commitments through the KMGBF, these developments could also threaten international trade opportunities. Chapter 24 of the *Canada-European Union Comprehensive Economic and Trade Agreement (CETA)* states that parties must enforce and maintain their respective domestic environmental laws, and not waive or derogate from those standards to encourage economic activity (Government of Canada, 2017). Because the Discussion Paper and changes to pesticide regulations would weaken environmental standards for the stated purpose of economic gain, they could place Canada at odds with its commitments under Chapter 24 of CETA. As a result, the Government may unintentionally trigger retaliatory sanctions from the European Union.

In the wake of these conflicting policy decisions, national ENGOS³ gathered at the Halt & Reverse Nature Loss Summit in June 2026 to discuss the domestic implementation of *A Force of Nature* and recent legislative proposals. Although we welcome *A Force of Nature*, we remain deeply concerned with the federal government's progress on halting and reversing nature loss.

ENGOS want to be a part of the solution and have much expertise to offer. Therefore, this paper is informed by this the Halt and Reverse Nature Loss Summit, as well as the sector-wide response to recent policy announcements.

The following sections outline how each pillar of *A Force of Nature* can be implemented in a nature-positive way with actionable solutions for their proper execution.

³ Alliance of Canadian Land Trusts, Birds Canada, Canadian Biosphere Reserves Association, Canadian Parks and Wilderness Society, Canadian Wildlife Federation, David Suzuki Foundation, Ducks Unlimited, East Coast Environmental Law, Greenpeace, Métis National Council, Yellowstone to Yukon, Natural Resources Defence Council, Nature 4 Justice, Nature Canada, Nature Conservancy of Canada, Nature United, Oceans North, SeaBlue Canada, Wildlife Conservation Society Canada, and World Wildlife Fund Canada all attended the meetings.



Pillar 1: Protecting Nature in Canada

What is Pillar 1: Protecting Nature in Canada?

Pillar 1 of *A Force of Nature* embodies Target 3 of the 2030 Nature Strategy, outlining Canada's commitment to conserving 30 per cent of lands, waters, and oceans by 2030. *A Force of Nature* includes a pathway to achieving '30x30' by fostering partnerships with Indigenous communities, provinces, territories, non-profit organizations, industry, and private landowners, to expand the network of traditional and innovative approaches to conservation. Currently, Canada's protected and conserved areas sit roughly halfway to these targets, with terrestrial conservation standing at 14 per cent and marine conservation at 15.5 per cent.

To advance these numbers, the Government of Canada has committed to create new federal protected and conserved areas (i.e., national parks, national urban parks, National Wildlife Areas, national marine conservation areas, Marine Protected Areas, Indigenous Protected and Conserved Areas), conservation initiatives with Indigenous partners, and innovative conservation tools (e.g., Other Effective area-based Conservation Measures (OECMs)). However, these combined marine efforts would not attain the goal of conserving 30 per cent of Canada's oceans by 2030; when added to the 15.5 per cent, a gap of 1.8 per cent remains.

Risks to Delivery of Pillar 1: Protecting Nature in Canada

Major Projects Office & Fast-tracking Legislation

The proposed changes in the discussion paper *Getting Major Projects Built in Canada* include the creation of 'Federal Economic Zones'.

Federal Economic Zones grant Cabinet the authority to pre-approve development zones which can be exempt from existing environmental laws. There are currently no limits to the size of these zones, meaning present or future governments could disregard environmental protections wherever they desire to do so. In addition, the creation of these zones could allow foreign companies to destroy Canada's biodiversity to generate profits that would be exported back to their own countries, leaving Canadians to carry the burden of environmental harm and remediation in our country. If the creation of these zones and the designation of protected areas do not happen concurrently, vulnerable ecosystems risk being degraded before they can ever receive formal protection.

Government Budget Cuts

Significant federal budget cuts have shut down critical programs, resulting in a loss of expertise. Despite commitments to ocean conservation in the 2030 Nature Strategy, ocean funding has experienced a \$100 million reduction (SeaBlue Canada, 2026), eliminating more than 180 experts, including 40 habitat restoration scientists (PIPSC, 2026). ECCC also faced significant workforce reductions that resulted in staff changes and the merging of several files, including the protected areas team at the Canadian Wildlife Service.



Solutions for the Efficient Delivery of Pillar 1

Support Indigenous-led Conservation

The sound delivery of Pillar 1 relies on fostering deeper partnerships with Indigenous communities. To ensure stability, the Government should permanently fund and support Indigenous Guardians programs and Indigenous-led conservation initiatives (e.g., Indigenous Protected and Conserved Areas (IPCAs)) to successfully attain Canada's 2030 targets. Following the Green Budget Coalition's recommendations for the 2025 budget, approximately \$500 million per year ongoing should be allocated toward supporting Indigenous-led conservation initiatives (Green Budget Coalition, 2024).

Additionally, ECCC should begin establishing the Arctic Indigenous Guardians Program promised in *A Force of Nature*.

Shared Federal-Provincial-Territorial Vision

As outlined in *A Force of Nature*, the federal government only owns 6% of Canada's land (Government of Canada, 2026), meaning that advancing Canada's '30x30' goal requires provinces and territories to contribute. A shared vision can be achieved by creating additional Nature Agreements between the federal government and willing provinces and territories. Also, convening annual federal-provincial-territorial (FPT) meetings to discuss multi-jurisdictional approaches to nature, conservation, restoration, and species at risk. This could, for example, be a good role for the Secretary of State for Nature, the Minister of the Environment, Climate Change and Nature, or a dedicated Secretariat.

Identify High-biodiversity Areas for Improved Spatial Planning

Areas that need protection, such as critical habitats and key biodiversity areas (KBAs), should continue to be identified and mapped through collaborative initiatives between the federal government, the provinces, the territories, Indigenous Peoples, and other partners. This work should build on existing federal initiatives, including the identification of KBAs and Parks Canada's mapping of national priority areas for ecological corridors. This spatial data should inform the locations of future protected and conserved areas.

Establish & Finalize Protected and Conserved Areas

Under the terrestrial portfolio of *A Force of Nature*, the Government has committed to establishing several new protected and conserved areas.

Over the next five years, the Government should advance its commitment to establishing ten new national parks, while finalizing four key sites: South Okanagan-Similkameen National Park Reserve; Seal River Watershed IPCA and National Park Reserve; Teet'it Gwinjik (Peel River) Watershed National Park Reserve; and Tū Łídlini (Ross River) Protected Area. Planning for six additional national parks must begin.

The Government has also committed to establishing 15 new national urban parks. Over the next five years, sites in Halifax (Blue Mountain-Birch Cove Lakes), Windsor (Ojibway Prairie



Complex), Saskatoon (Meewasin Valley), and Victoria (Greater Victoria) should be finalized. Furthermore, the Government should initiate the planning of new urban parks in St. John's and Winnipeg (announced in 2024), and recommence actions in Edmonton (announced in 2022).

The national urban park in Edmonton, announced in March 2022, was blocked in the pre-feasibility phase due to two pieces of provincial legislation. The *Municipal Government (National Urban Parks) Amendment Act* prevents a municipality from entering into any agreement to develop a national urban park without specific provincial approval, while the *Provincial Priorities Act* requires provincial entities to obtain approval before entering into agreements with the federal government.

In addition, federal commitments also include four new National Wildlife Areas (NWAs). Over the next five years, the Atlantic Archipelago National Wildlife Area in Nova Scotia should be finalized, with planning commencing for the three remaining NWAs.

Lastly, the Government has committed to establishing two new IPCAs, including the Wiinipaawk IPCA and the Seal River Watershed IPCA. Beyond these commitments, Indigenous, community, and national advocacy groups are calling for additional IPCAs, including the Dene K'éh Kusan IPCA in British Columbia and the Sâkitawâhk IPCA in Saskatchewan. Federal support and action are required to advance these proposed IPCAs.

Under the marine portfolio of *A Force of Nature*, the Government has committed to establishing up to ten new national marine conservation areas (NMCAs) and expanding the network of Marine Protected Areas (MPAs) over the next five years. Following a 2012 proposal from Parks Canada, Indigenous, community, and national advocacy groups are calling for an NMCA in the Salish Sea, alongside ongoing calls for an NMCA in Lake Ontario. Federal action is required to advance these NMCAs and initiate planning for new MPAs.

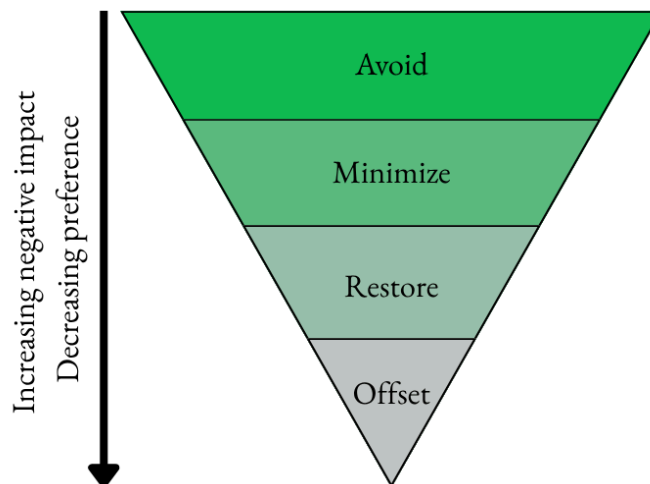
To reinforce *A Force of Nature's* commitment to ocean conservation, the Government should ratify the High Seas Treaty (BBNJ Agreement), supporting the global mandate to protect 30% of the world's oceans by 2030.

Pillar 2: Building Canada Well

What is Pillar 2: Building Canada Well?

Pillar 2 of *A Force of Nature* outlines Canada's commitment to integrate its nature and economic agendas to ensure environmental protection and timely development decisions. Pillar 2 promises to ensure that development is backed by science, and tools like the Mitigation Hierarchy and nature-based solutions⁴. By using mapping to identify KBAs and areas of high biodiversity, project proponents can integrate conservation, carbon accounting, and project planning to ensure ecosystems and their services are maintained. In addition, the federal government will use regional impact assessments⁵ to examine the effects of a project within a specific region to address cumulative effects and advance project permitting. Lastly, the Canada Water Agency will develop a National Water Security Strategy in collaboration with Indigenous, provincial, and territorial partners.

What is the Mitigation Hierarchy?



The Mitigation Hierarchy is a sequential framework used to **identify** and **manage** the **environmental impacts** of development. It is particularly important for minimizing impacts on degraded ecosystems and areas of high biodiversity (International Union for Conservation of Nature [IUCN], 2025).

The framework is designed to first, **avoid** predicted impacts on biodiversity to the greatest extent possible; second, **minimise** impacts that could not be entirely avoided; and third, place damaged areas under **restoration**. Only as a last resort should **offsets** be applied to compensate for residual environmental impact.

⁴ Nature-based solutions are actions that sustainably manage and restore ecosystems with the purpose of mitigating and adapting to the effects of climate change (Government of Canada, 2025; IUCN, n.d.)

⁵ Regional impact assessments examine the effects of activities within a specific region. Regional impact assessments are broader than project-specific impact assessments, examining cumulative effects within a region and impacts from multiple activities within a region (Impact Assessment Agency of Canada, 2025).

Risks to Delivery of Pillar 2: Building Canada Well

Major Projects Office & Fast-tracking Legislation

The legislation proposed by the Government is centred around late-stage regulatory exemptions and final approval decisions. These reforms do not address a core issue of major projects in Canada: ecological risks are often only surfaced and addressed toward the late-stages of the project design. Permitting safeguards are rarely the barrier to timely major project decisions; rather, delays can result from the failure to apply existing tools early and consistently, allowing conflicts to emerge late in the process. The proposed legislation enables projects to proceed before biodiversity, ecological, climate, and cumulative risks are understood.

Additionally, Federal Economic Zones would allow Ministers to exempt specific projects from the *Species at Risk Act*. Although endangered species are legally protected through this Act, some species, like British Columbia's caribou, have still been found to be declining due to government-subsidized oil and gas activities taking place in their critical habitat (DiSilvestro, 2022). Despite the fact that there are legal mechanisms in place, the proposed legislation could further endanger or eradicate critical species, undermining the commitment to build Canada well.

Furthermore, the proposed legislation politicizes major project approvals without necessarily providing greater certainty for project proponents. Nearly a year after the *Building Canada Act* passed, not a single project had been formally designated as a 'project of national interest' (Koplovich & Vegh, 2026; Gordon, 2026), although three have been proposed. Investing in nature can enhance a corporation's reputation (United Nations Global Compact, 2025). Conversely, when a corporation's actions harm the environment, this can damage their reputation and tarnish their social license, and increase the potential for litigation. Rather than providing certainty, a fast-tracking regime that fails to identify and address these risks early may ultimately discourage investment and delay projects.

Implications for Crown-Indigenous Relations

Indigenous Peoples are a key part of *A Force of Nature*. The Discussion Paper undermines this commitment with a shortened and weak consultation process, potentially jeopardizing Crown-Indigenous relations. After a unanimous vote to oppose proposed major projects reform at the Assembly of First Nations 2026 Annual General Assembly, National Chief Cindy Woodhouse Nepinak said, "These proposals raise significant concerns regarding Canada's commitment to upholding its constitutional, statutory and international obligations to First Nations" (Forester, 2026a; Forester, 2026b).

A Force of Nature requires close partnerships with Indigenous communities, which the proposed legislation may threaten. In the event where proper consultation is not carried out and/or Aboriginal rights are infringed upon, Indigenous groups may pursue litigation.



Weakening of Pest Control Products Act

The weakening of the *Pest Control Products Act* directly endangers critical species. The new amendments allow Cabinet to authorize the use of any pesticide if it deems it to be in the interest of national economic security, regional economic security, or national food security. This could include the authorization of banned pesticides that have shown serious risks to human health and/or the environment. As detailed in a letter from Canadian scientists, granting Cabinet authority to override the Minister's science-based risk assessments will be detrimental to non-target species, including humans, wildlife, and species at risk (Morrissey et al., 2026). Granting Cabinet the ability to override scientific findings violates the Government's promise not to allow politics to defeat science. Additionally, from an economic perspective, these amendments complicate Canada's trade relationships. Maintaining robust environmental legislation is critical to preserving trade relationships under CETA.

Solutions for the Efficient Delivery of Pillar 2

Apply A Whole-Of-Government Mitigation Hierarchy Policy

The Mitigation Hierarchy would address many of the problems outlined in the Discussion Paper. It would create a clear path for project proponents, and would draw on departmental areas of expertise, particularly within ECCC and DFO, to support a path toward building Canada well. But, this would need to be embedded within a whole-of-government approach. Establishing a whole-of-government approach to nature would align the implementation of *A Force of Nature* with economic and infrastructure priorities. The Mitigation Hierarchy must be associated with a clearly defined mandate with sequencing expectations ('avoidance-first logic') and timing requirements. Following the IUCN definition⁶ for the Mitigation Hierarchy, the policy must integrate a restoration aspect.

Avoiding & Minimizing: Embed Conservation into Wider Decision Making and Existing Decision Instruments

Ecological risk assessments and the Mitigation Hierarchy are key tools for ensuring conservation is integrated into wider decision making. As complementary tools, they can be integrated into existing decision instruments and work synergistically to avoid adverse environmental impacts. Following recommendations from the Wildlife Conservation Society of Canada (2026), there are several ways to embed conservation into decision-making.

The federal government should integrate the Mitigation Hierarchy into the Cabinet Directive on Regulatory Efficiency for Clean Growth Projects, as well as the Economic, Climate, and Nature Lens applied to Cabinet decision documents.

⁶ "The mitigation hierarchy intends first to avoid, to the greatest extent possible, predicted impacts on biodiversity, then to minimise losses that could not be avoided, and place damaged areas under restoration. Biodiversity offsets are the last resort in the mitigation hierarchy, to counterbalance any residual losses that remain. The goal of the mitigation hierarchy is to achieve no net loss or a net gain of biodiversity." (IUCN, 2025)



Next, the Government should require the MPO to incorporate the application of the Mitigation Hierarchy and related ecological risk assessments into its early-stage project review and advisory processes.

Similarly, during specific decision points, the Government should require the full application of ecological risk assessments, including Mitigation Hierarchy sequencing, before any project is designated under the *Building Canada Act*.

Lastly, drawing on reforms to Australia's *Environment Protection and Biodiversity Conservation Act*, the federal government should amend the *Canadian Environmental Protection Act* to make the 'non-regression' principle legally binding, rather than an interpretive guide. The Australian reforms specify that once an environmental standard has been in place for 18 months, it cannot be changed to reduce environmental protections, or the likelihood of consultation or engagement.

Avoiding & Minimizing: Enforce Existing Environmental Laws

The Prime Minister's Office should re-establish a dedicated senior policy role with expertise in environment and biodiversity to support a whole-of-government approach to nature. Given the cross-cutting nature of these issues, it is important that this role be embedded within core decision-making processes and equipped to provide strategic advice across departments, rather than serving solely as a stakeholder relations function. Ensuring that specialized expertise is represented at the decision-making table will help align infrastructure, economic, climate, and conservation priorities across government.

Avoiding & Minimizing: Integrate and Use Existing Tools Earlier

The proposed legislation is centred around late-stage regulatory exemptions and final approval decisions. Emphasis must be placed on early-stage risk management to avoid environmental harm and maintain timely processes. The Government should shift ecological risk management upstream rather than relying on late-stage permitting interventions. Next, the federal government should proactively characterize and address cumulative effects at the landscape level using thorough regional and strategic assessments. Following a whole-of-government approach, the MPO and project proponents should work alongside existing Government departments, like ECCC and DFO, to ensure regional assessments are comprehensive. ECCC and DFO should be involved in these processes from the beginning, as these departments hold critical information that can help avoid environmental damage.

Avoiding & Minimizing: Federal Leadership on Ecological Mapping and Environmental Data Infrastructure

Existing mapping data is inconsistent, inaccessible, and outdated. Therefore, the federal government should play a leadership role in ensuring data is cohesive, standardized, accessible, and updated so that project proponents can easily use and rely on this data to avoid environmental harm. This mapping data needs to be consistent across jurisdictions and integrated with Indigenous knowledge, while protecting culturally significant areas.



Following reforms to Australia's *Environment Protection and Biodiversity Conservation Act*, a Head of Environment Data should be established within a central agency to standardize and centralize the collection and archival of environmental data. Establishing such a role would also increase efficiency by centralizing environmental data functions within the federal government.

Restoration: National Restoration Strategy

As a critical next step following *A Force of Nature*, the Government should address the important missing component of restoration, by developing a National Restoration Strategy, guided by the broader 2030 Nature Strategy. As a start, the Government should work to define and identify "degraded areas", define "effective restoration", and assess priority areas for restoration.

Offset: Habitat Equivalency Analysis & Offset-In-Lieu Scheme

The federal government should follow DFO's established approach to offsetting. DFO uses Habitat Equivalency Analysis (HEA), a methodology designed to replace damaged habitat by replacing lost ecosystem services⁷ in another habitat (Clarke & Bradford, 2014). HEA determines case-by-case offset ratios, applying conversion factors when the offset habitat is significantly different from the original habitat, ensuring compensation scales accurately to the impact on ecosystem services (i.e., identical habitats would result in 1:1 compensation), resulting in no net loss. The provincial government of Nova Scotia follows a similar method in salt marshes; after ensuring habitat loss is minimized or avoided, damages to salt marshes must be restored and enhanced, or as a last resort, offset elsewhere by creating alternative habitat (Government of Nova Scotia, 2021). The federal government should encourage opportunities for additionality and net gain in offsetting as well so that we can leave nature better off and support long-term benefits for Canadians.

As a last resort, when residual impacts remain after all opportunities to avoid, minimize and restore have been exhausted, an offset-in-lieu mechanism should also be available. Drawing on recent reforms to Australia's *Environment Protection and Biodiversity Conservation Act*, which allow project proponents to make restoration contribution payments for the Government to deliver environmental offsets, Canada should establish a dedicated fund to support measurable conservation and restoration outcomes, including Indigenous-led conservation. The Environmental Damages Fund, which already directs payments arising from environmental harm toward restoration and conservation, provides a useful Canadian model for how such a fund could operate.

⁷ "Services produced by living and non-living components of ecosystems that contribute or benefit human society and well-being" (Natural Resources Canada, 2025).

Pillar 3: Valuing Nature and Mobilizing Capital

What is Pillar 3: Valuing Nature and Mobilizing Capital?

Pillar 3 of *A Force of Nature* embodies Target 19 of the 2030 Nature Strategy, outlining Canada's commitment to drive private investment in nature-positive outcomes and improve the way we account for the value of nature. Currently, it is estimated that approximately \$1 trillion USD of global annual investment is missing to meet KMGBF targets (BloombergNEF, 2025). The creation of an Expert Taskforce on Natural Capital Accounting and Nature Financing will allow the Government to explore opportunities in how they can attract private sector investment in nature, promote more public-private partnerships, and look into how the value of nature can be integrated into decision-making.

Nature valuation moves beyond traditional economic measures like GDP. Canada's nature underpins our economy, therefore nature valuation helps make the economic value and benefits of nature more visible to better help decision-makers understand the role of nature in our societies (United Nations Environment Programme, 2025). It is estimated that Canada's ecosystem services are valued at approximately \$3.6 trillion per year, which is more than double Canada's GDP in 2018 (Molnar et al., 2021).

Risks to Delivery of Pillar 3 - Valuing Nature

Major Projects Office & Fast-tracking Legislation

Similarly to Pillar 1, the creation of Federal Economic Zones and the process of valuing nature must happen in sequence. Valuing nature before the designation of Federal Economic Zones is crucial to protecting key ecosystems.

Moreover, the increasing trend toward fast-tracking decisions before the value of ecosystem services is fully considered undervalues ecosystem services that nature provides for free and therefore risks overlooking the economic costs of nature loss. There is significant risk in prioritizing short term economic benefits over the long term benefits that nature provides.

Government Budget Cuts

A crucial component of valuing nature is assessing ecosystem services, and therefore, tracking the condition of ecosystems. The Census of Environment (CoE) catalogues ecosystems in Canada and is important in helping decision-makers make evidence-based decisions to protect and sustain our environment. CoE allows policymakers to have access to information on Canada's ecosystems and their benefits just as much as they have access to economic and socio-economic information (Statistics Canada, 2024). The scope of Statistics Canada's Census of Environment has recently been reduced, opening a large knowledge gap for valuing nature.



Monetizing Nature

Assigning economic value to nature can help ensure that its contributions are considered alongside other economic factors in decision-making. However, valuation also carries risks. Ecosystems are complex, and their full benefits may be difficult or impossible to quantify accurately. An incomplete valuation could undervalue nature and inadvertently justify its loss where the apparent economic benefits of development are greater.

Economic valuation must also recognize that not all of nature's value can or should be expressed in monetary terms. Nature has intrinsic, cultural, spiritual, and relational values that conventional economic measures may not capture, including values reflected in Indigenous knowledge and worldviews. Valuation should therefore be used as one tool to inform decision-making, rather than as a substitute for ecological limits, Indigenous rights, or existing environmental protections.

Risks to Delivery of Pillar 3 - Mobilizing Capital

Major Projects Office & Fast-tracking Legislation

Investing in nature can benefit corporations by mitigating environmental risks, helping them access new markets, driving new product development, and most importantly, enhancing their reputation (United Nations Global Compact, 2025). Conversely, environmental policy uncertainty and weakened protections can increase risks for private-sector investment and undermine confidence in nature-positive investment. Without clear and consistent environmental rules, investors hesitate to commit capital, particularly to projects whose long-term value depends on stable nature and climate policy.

Solutions for the Efficient Delivery of Pillar 3

Fund Nature Accounting Programs: Census of Environment

As mentioned above, the Census of Environment is a key component to valuing nature in decision-making. In addition to the creation of an Expert Taskforce on Natural Capital Accounting and Nature Financing, the federal government should reinstate the scope of the Census of Environment to ensure our ecosystems are being catalogued and rightfully included in decision-making processes.

Strengthen the quality of environmental data

Similarly to the Pillar 2 recommendation, the federal government can improve its methods for natural capital assessment by playing a leadership role in ensuring data is cohesive, standardized, accessible, and updated.

The Government can ensure leadership by creating a Head of Environment Data within the central agencies to standardize and centralize the collection and archival of environmental data, including geospatial data.



Ensure Transparency of Nature Valuation Methods

The methodology for valuing nature must be adaptive and publicly available to ensure standardization and accountability within the country.

Follow Canada's Nature Advantage's Economic Recommendations

Canada's Nature Advantage provides five recommendations to scale investment in nature from the private sector (Canada's Nature Advantage, 2026).

First, the federal government should build foundations for private capital investment in nature by classifying natural assets as capital, and estimating the value of our natural assets. This can be attained by undertaking a national assessment of the value of Canada's natural assets (through the Census of Environment) and establishing a sixth category within the federal Capital Budgeting Framework for natural assets.

Second, the federal government should modernize nature data infrastructure to support natural capital valuation, investment, and decision-making. It is essential that valuation is standardized, consistent, and verified. This work coincides with other recommendations in Pillars 1 and 3, such as re-establishing the Census of Environment and strengthening the quality of environmental data.

Third, the federal government should launch a blended finance mechanism to de-risk private investment in nature-positive working landscapes, anchored with Indigenous leadership and stewardship. Investments in nature are growing (Bennett et al., 2026), but widespread adoption remains restricted due to uncertainty and high upfront costs. To encourage adoption, the Government should establish a pilot blended-finance mechanism, housed within the Nature Protection Fund, that mobilizes private investment alongside targeted public investment. In addition, a Technical Assistance Facility should support project proponents with feasibility assessments, financial structuring, and project design to strengthen participation and identify investable projects.

The purpose of nature finance should be to mobilize additional resources for nature-positive outcomes, not to assign a price to nature or make environmental harm more easily tradable. With this purpose in mind, the federal government should support and integrate the potential of nature positive projects in a carbon market and national credit system. Canada's current carbon market system relies on unpredictable and low-value voluntary markets. Establishing a carbon and credit system based on regulations would enable Canadians to access private capital while supporting environmental outcomes. High-integrity markets require time and regulations. To start, the federal government should develop regulated offset protocols for natural systems, work with the provinces and territories to enable integration within industrial carbon pricing systems, clarify carbon and environmental attribute rights, and support interoperability and potential linkage with international markets.

Similarly, the Government should establish a biodiversity credit framework aligned with the Mitigation Hierarchy and international best practices. The International Advisory Panel on Biodiversity Credits (2026) and the International Institute for Sustainable Development (Letting & Strömgaard, 2025) urge biodiversity credit markets to reflect four themes: verified positive



outcomes for nature, centering Indigenous leadership in conservation, equity and fairness for people, and good governance for high-integrity markets. Establishing biodiversity credit compliance markets that create predictable demand helps to mobilize private capital for on-the-ground conservation and protection. This follows the recommendation of a federal biodiversity market under Pillar 2.

Indigenous leadership, jurisdiction, and stewardship must be embedded into nature finance. As a signatory to the United Nations Declaration on the Rights of Indigenous Peoples, Canada's commitments under *A Force of Nature* must be grounded in Indigenous rights and leadership. The Government should ensure all nature finance programs recognize Indigenous and treaty rights, clarify rights to environmental attributes, expand access to capital, incentivize Indigenous asset ownership and participation, and support Indigenous-led project development.



Conclusion

A Force of Nature represents a significant commitment to protecting nature and recognizes the essential role that nature plays in Canada's prosperity. Now, the challenge is to ensure that this ambition is reflected across government as Canada pursues its agenda to build a stronger, more resilient economy and advance major infrastructure projects.

Budget and workforce reductions, the winding down of important nature programs, and proposed measures to fast-track major projects while exempting them from environmental protections are a cause for concern. These significantly risk undermining the Government's nature commitments.

However, these competing directions can be reconciled. As Prime Minister Carney has said, "When we fail to protect nature, we are not making a sound economic choice. We are making a choice that works against us."

Putting nature up front in project planning and economic decision-making is essential to Canada's commitment to halt and reverse nature loss, while providing greater certainty, reducing conflict and supporting better projects. The recommendations in this report offer practical ways to bring Canada's nature and economic agendas together and make the most of the Government's \$3.8 billion investment in nature.

This is our chance to get it right: to build a stronger Canada while protecting and restoring the nature that sustains us for generations to come. These recommendations provide a clear roadmap for delivering on Canada's nature commitments while advancing its economic ambitions. Nature Canada stands ready to support the federal government's implementation of *A Force of Nature* across five priority areas: establishing whole-of-government leadership, institutionalizing an 'avoidance-first' Mitigation Hierarchy, empowering Indigenous-led conservation, anchoring decisions in science and data, and integrating the value of nature into economic decision-making.

Let's 'Build Canada Well' by placing nature up front from the start.

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Appendix 1: Status of 2030 Nature Strategy Programs

Department	Program	Status
DFO	Marine Spatial Planning	Closed in 2024
	Aquatic Ecosystems Restoration Fund	Closed since 2023
	Canada Nature Fund for Aquatic Species at Risk	Closed since 2024
	Annual Sustainability Survey for Fisheries	No update since 2024
	Canadian Action Plan to Address the Threat of Aquatic Invasive Species	No update since 2018
	Sea Lamprey Control Program	No update for 2026
	Oceans Management Contribution Program	No plan for a third call for proposals
ECCC	Nature Agreements	Funding agreements for Nova Scotia, British Columbia, and Yukon have expired
	Canada's Climate Change Adaptation Platform	No update since 2024/2025
NRCan	2 Billion Trees Program	Closed since 2025
HC	Canadian Water Monitoring Program for Pesticides	No update since 2024
StatCan	Census of Environment	Scope reduced
ECCC & HC	Chemicals Management Plan	No renewed funding for 2026
PC	National Program for Ecological Corridors	Government has indicated that this program may close

1000 - 141 Laurier Ave W., Ottawa, ON, K1P 5J3
1-800-267-4088
info@naturecanada.ca
naturecanada.ca



1000 - 141 Laurier Ave W., Ottawa, ON, K1P 5J3

1-800-267-4088

info@naturecanada.ca

naturecanada.ca