



May 12, 2026

The Honourable Julie Dabrusin  
Minister of the Environment, Climate Change and Nature  
House of Commons  
Ottawa, Ontario K1A 0A6

**Subject: Draft 2026 – 2029 Federal Sustainable Development Strategy**

Dear Minister Dabrusin,

On behalf of the Conservation Council of New Brunswick, thank you for the opportunity to provide comments on the draft 2026–2029 Federal Sustainable Development Strategy (FSDS). We appreciate the work undertaken by Environment and Climate Change Canada and recognize the importance of maintaining a federal framework for sustainable development that helps guide policy and accountability across government.

The Conservation Council of New Brunswick (CCNB) is one of Canada’s oldest environmental organizations and has worked for more than 55 years to advance environmental protection, sustainability, and public engagement in New Brunswick and Atlantic Canada. CCNB works across interconnected issues including climate action, freshwater protection, forest conservation, marine protection, biodiversity conservation, environmental education, and sustainable communities through research, policy analysis, advocacy, and community engagement. We are providing the following comments and recommendations because we believe the Federal Sustainable Development Strategy should represent a bold, integrated, and forward-looking vision for sustainable development that fully reflects the ecological foundations upon which healthy communities, economies, and future generations depend.

While the draft strategy contains many positive elements, including continued commitments related to climate action, clean growth, inclusion, and resilience, we are concerned that the new version is less robust and less fully aligned with the spirit and structure of the United Nations Sustainable Development Goals (SDGs) than previous versions of the FSDS.

One of the most significant shifts is the move away from the integrated SDG framework toward a simplified “pillar” approach that separates society, economy, and environment into distinct categories. While this may improve readability, it risks reinforcing a fundamentally flawed understanding of sustainability. Increasingly, sustainability is framed as a balancing act between

environmental, social, and economic priorities, as though these systems are in competition with one another. This framing is not only misleading but dangerous.

A healthy economy cannot exist without a healthy society, and a healthy society cannot exist without a healthy environment. The environment is not simply one pillar among equals. It is the foundation upon which all social and economic systems depend. Sustainable development policy should reflect this reality more clearly.

We are also concerned that the draft strategy increasingly frames environmental protection primarily through the lens of economic opportunity, competitiveness, productivity, and clean growth. While economic transition is important, the natural world must not be viewed solely as a tool to support economic development or human use. Ecosystems, species, water, forests, and oceans possess intrinsic value beyond their economic utility. A truly sustainable development strategy should recognize the importance of protecting nature not only because it benefits the economy, but also because healthy ecosystems are essential to life itself and deserve protection in their own right.

Compared to previous FSDS versions, the draft also appears to reduce the visibility and prominence of biodiversity, oceans, and freshwater protection. While climate action appropriately remains central, biodiversity loss, declining freshwater health, and marine ecosystem degradation are deeply interconnected challenges that require equal attention. The draft FSDS itself acknowledges the severity of the crisis, noting that Canada is warming at twice the global average and that Northern Canada is warming at three times the global average. These accelerating impacts highlight the need for a more integrated and ecologically grounded approach that recognizes healthy ecosystems, climate stability, and freshwater protection as inseparable foundations of long-term sustainability. These priorities should remain clearly visible within the strategy rather than being consolidated into broader categories that weaken accountability and focus.

The United Nations SDGs were intentionally designed as an integrated framework recognizing that environmental, social, and economic systems are inseparable. We encourage the federal government to strengthen the draft FSDS by more clearly reflecting this systems-based understanding and by reaffirming that long-term economic and social prosperity depend fundamentally on ecological integrity.

We also believe the FSDS should more clearly recognize the critical role of environmental and climate literacy in achieving long-term sustainability goals. Building a sustainable and climate-resilient future requires equipping people across Canada with the knowledge, skills, and opportunities to understand ecological systems, climate change, biodiversity loss, and sustainable decision-making. Environmental and climate literacy should be recognized as foundational components of sustainable development and integrated into education systems nationwide.

Canada has an opportunity to demonstrate international leadership by advancing an ambitious, integrated, and ecologically grounded vision of sustainable development. We encourage the federal government to strengthen the draft strategy to better reflect these principles.

Below (attached), we provide specific comments and recommendations for strengthening the strategy. We thank you for your consideration and welcome the opportunity to meet to discuss these comments and recommendations further.

Sincerely,

A handwritten signature in black ink that reads "Beverly Gingras". The signature is written in a cursive, flowing style.

Beverly Gingras  
Executive Director  
Conservation Council of New Brunswick



Conservation Council of New Brunswick  
Conseil de conservation *du* Nouveau-Brunswick

## Comments and Recommendations on the Draft 2026–2029 Federal Sustainable Development Strategy

### 1. Reframe Sustainability Around Ecological Foundations

The strategy should move away from presenting the environment, society, and economy as separate or competing pillars. Instead, the FSDS should explicitly recognize that the environment is the foundation upon which healthy societies and economies depend. This systems-based framing would better align with the intent of the UN Sustainable Development Goals and modern sustainability science.

Recommendations:

- Revise introductory language and guiding principles to clearly state that ecological integrity underpins long-term social and economic well-being.
- Include a systems-thinking framework that demonstrates the interconnected relationship between environmental, social, and economic outcomes.
- Recognize ecological sustainability as a prerequisite for long-term economic and social resilience.

### 2. Strengthen Alignment with the United Nations Sustainable Development Goals

The previous FSDS more clearly reflected the structure and intent of the Sustainable Development Goals (SDGs). While streamlining may improve readability, the current draft reduces visibility for several key sustainable development priorities and weakens the integrated nature of the framework.

Recommendations:

- More clearly map FSDS goals and targets against all 17 SDGs.
- Ensure the strategy maintains balanced attention across environmental, social, and economic priorities.
- Reintroduce stronger integrated reporting and accountability mechanisms tied to the SDGs.

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- Better reflect the “leave no one behind” and systems-based principles embedded within the UN framework.

### **3. Add a Dedicated Freshwater Security and Watershed Health Goal**

While freshwater is referenced in the draft strategy, it does not receive sufficient prominence relative to the scale of current and emerging threats.

Suggested Goal:

“Canada’s freshwater systems, watersheds, and aquatic ecosystems are protected, restored, and sustainably managed to ensure clean, accessible, climate-resilient water for people and nature.”

Potential Targets:

- Improve the ecological health of priority watersheds across Canada by 2030.
- Reduce nutrient, chemical, and emerging contaminant pollution in freshwater systems.
- Increase federal support for watershed-based governance and source water protection initiatives.
- Improve long-term monitoring of groundwater, water quantity, and cumulative watershed impacts.

### **4. Add a Dedicated Goal Related to Biodiversity Recovery and Ecological Integrity**

Biodiversity is currently present within the draft strategy but lacks the visibility and urgency required to address the biodiversity crisis.

Suggested Goal:

“Canada halts and reverses biodiversity loss while restoring ecological integrity and improving the resilience of natural ecosystems.”

Potential Targets:

- Increase protected and conserved areas while ensuring ecological connectivity and representation.
- Restore degraded ecosystems including wetlands, forests, rivers, and coastal habitats.
- Improve the status of species at risk and reduce habitat fragmentation.
- Increase federal investment in ecological restoration and nature-based climate solutions.

### **5. Add Stronger Ocean and Coastal Protection Goals**

Oceans and marine ecosystems should be more visible within the strategy, given increasing pressures from climate change and industrial development.

Suggested Goal:

“Canada’s marine and coastal ecosystems are protected, restored, and resilient to climate and industrial pressures.”

Potential Targets:

- Improve protection and restoration of marine habitats and biodiversity.
- Reduce marine pollution and cumulative impacts on coastal ecosystems.
- Strengthen climate adaptation planning for coastal communities and ecosystems.
- Expand marine protected areas while ensuring effective long-term management.

## 6. Add a Goal Related to Environmental Health and Pollution Prevention

The strategy could better address the relationship between environmental contamination and human health.

Suggested Goal:

“Pollution is prevented and reduced to protect ecosystem integrity, biodiversity, and human health.”

Potential Targets:

- Reduce releases of toxic substances and contaminants of emerging concern including PFAS, microplastics, and pharmaceutical pollution.
- Strengthen pollution prevention and cumulative effects management.
- Reduce plastic pollution and improve circular economy performance.

## 7. Add a Goal Related to Environmental Justice and the Right to a Healthy Environment

The strategy currently gives limited attention to environmental justice and unequal exposure to environmental harms.

Suggested Goal:

“All people in Canada have equitable access to a healthy environment and are protected from disproportionate environmental harms.”

Potential Targets:

- Reduce environmental inequities affecting Indigenous, rural, northern, and marginalized communities.
- Improve access to clean air, clean water, and nature in underserved communities.
- Strengthen implementation of the right to a healthy environment under federal law.

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## 8. Strengthen Climate Goals by Better Integrating Nature

Climate action should not be treated separately from biodiversity, water, forests, and land-use planning.

Recommendations:

- Expand climate goals to explicitly include ecosystem-based adaptation and nature-based solutions.
- Include targets related to climate resilience of watersheds, forests, coastal ecosystems, and biodiversity corridors.
- Better integrate adaptation planning across federal infrastructure, biodiversity, freshwater, and land-use decisions.

## 9. Environment and climate literacy

Despite growing climate and biodiversity challenges, access to consistent, curriculum-linked environmental education remains uneven across Canada.

Suggested goal: All people in Canada have access to environmental and climate literacy opportunities that foster ecological understanding, climate resilience, and informed participation in sustainable development.

Suggested Targets:

- Integrate climate change, biodiversity, sustainability, and environmental literacy into education systems across Canada in collaboration with provinces, territories, and Indigenous partners.
- Increase federal support for place-based, outdoor, and experiential environmental learning opportunities.
- Support educator training and capacity-building related to climate and environmental education.
- Expand access to environmental literacy programs for underserved, rural, northern, and Indigenous communities.
- Support youth engagement and leadership opportunities related to sustainability and climate action

## 10. Support a Just and Accelerated Transition to Electric School Buses.

The Federal Sustainable Development Strategy should more clearly recognize the role of zero-emission school transportation in advancing climate, health, air quality, and environmental justice objectives.

Suggested Goal: “Canada transitions to clean, zero-emission school transportation systems that protect child health, reduce greenhouse gas emissions, improve air quality, and support equitable, climate-resilient communities.”

Recommendations:

- Establish dedicated, long-term federal funding to support the transition from diesel school buses to electric school buses across Canada.
- Support charging infrastructure development, workforce training, and grid readiness associated with school bus electrification.
- Prioritize equitable access to funding for rural, northern, Indigenous, and lower-capacity communities.
- Support interprovincial collaboration, bulk procurement opportunities, and knowledge-sharing to accelerate fleet transition.
- Recognize the public health benefits of reducing children’s exposure to diesel exhaust emissions through electrified school transportation.

## 11. Improve Responsible Consumption and Economic System Goals

The current draft strongly emphasizes productivity and competitiveness but provides comparatively little emphasis on reducing ecological footprints and unsustainable consumption patterns.

Suggested Goal:

“Canada transitions toward sustainable consumption, circular economic systems, and reduced ecological footprints.”

Potential Targets:

- Reduce per-capita material consumption and waste generation.
- Increase circular economy performance and resource efficiency.
- Reduce reliance on single-use materials and improve product stewardship systems.
- Expand sustainable procurement and low-impact supply chains.

## 12. Increase Ambition and Accountability

Some goals and targets remain broad and aspirational, lacking sufficient clarity on implementation, timelines, or accountability mechanisms.

Recommendations:

- Include clearer interim milestones and measurable indicators across all goal areas.
- Strengthen public reporting requirements and transparent progress tracking.
- Ensure targets are ambitious enough to respond to the scale and urgency of the climate, biodiversity, and water crises.

### **13. Recognize the Intrinsic Value of Nature**

The strategy frequently frames nature primarily in terms of economic opportunity, competitiveness, productivity, or services to humans. While these are important considerations, the FSDS should also recognize the intrinsic value of ecosystems and species.

Recommendations:

- Include language recognizing that nature has value beyond economic utility.
- Ensure conservation and ecosystem protection goals are not framed solely through economic outcomes.
- Reinforce stewardship, ecological responsibility, and intergenerational equity as core principles of sustainable development.

### **14. Address Additional Missing or Underdeveloped Sustainability Issues**

Several emerging or interconnected sustainability challenges could be more clearly reflected in the strategy.

Recommendations:

- Expand references to cumulative and cascading environmental impacts and environmental justice.
- Better integrate climate adaptation with biodiversity, water, and land-use planning.
- Include greater attention to contaminants of emerging concern such as PFAS, microplastics, and pharmaceutical pollution.
- Recognize increasing pressures related to water commodification and long-term resource security.
- Improve integration of biodiversity, climate, freshwater, and health objectives across all pillars of the strategy.