



May 28, 2026

Response to the Government of Canada’s Discussion Paper:

“Getting Major Projects Built in Canada – Proposed Legislative, Regulatory, and Policy Reforms”

The Conservation Council of New Brunswick (CCNB) appreciates the opportunity to provide comments on the Government of Canada’s proposed legislative, regulatory, and policy reforms related to major project approvals. CCNB is one of Canada’s longest-standing environmental organizations. Since 1969, we have worked to protect the environment and advocate for healthy communities, strong public policy, and responsible stewardship of natural resources in New Brunswick and beyond. Our work spans climate action, freshwater protection, forest conservation, marine conservation, environmental education, and public engagement.

We are submitting these comments with the understanding that the proposed reforms have implications that extend far beyond individual projects or short-term economic cycles. In conservation, we do not work on one-year timelines driven by quarterly profits, nor do we work on four-year cycles shaped by political terms. We work across decades and generations to help ensure that future Canadians inherit healthy, livable communities, clean water, functioning ecosystems, abundant wildlife, and the natural landscapes that help define this country. Canada is internationally admired for its natural beauty and environmental richness. Those values are not accidental. They are the result of generations of people, communities, scientists, Indigenous nations, and governments working to establish protections that recognize the long-term public interest. We believe those protections should be strengthened and modernized where necessary, not weakened in response to short-term pressures.

At the same time, we recognize the importance of having regulatory systems that are effective, efficient, and capable of making timely decisions. We understand the need to improve coordination, reduce unnecessary duplication, and provide greater clarity and predictability within Canada’s project review processes. Long, unclear, or poorly coordinated processes can create frustration for communities, Indigenous nations, governments, workers, and proponents alike.

We therefore support efforts to improve timelines, coordination between departments, better early planning, stronger transparency, and more effective engagement processes. Canada should strive

for a regulatory system that is efficient, well-resourced, evidence-based, and capable of making timely decisions.

However, efficiency must not come at the expense of environmental protection, Indigenous rights, democratic accountability, public trust, environmental justice, or the long-term public interest.

The framing of many of these proposed reforms also raises concern, as it increasingly implies that environmental protections themselves are the primary obstacle to economic development and timely decision-making. We believe this is both a false narrative and a dangerous path to pursue. Environmental protections are not unnecessary barriers to prosperity; they are safeguards that help protect the very foundations upon which healthy societies and economies depend. In many cases, delays and inefficiencies stem from inadequate project planning, poor-quality applications, insufficient early engagement, jurisdictional overlap, or proponents failing to properly address environmental and community concerns from the outset.

Canada's environment is not separate from our economy, health, or way of life. It is the backbone of them. Clean water, healthy forests, functioning ecosystems, stable climates, and biodiversity support public health, local economies, recreation, food systems, culture, tourism, and the communities Canadians call home. These are not competing interests. They are deeply interconnected and central to Canadian identity and values.

Key Concerns

Environmental safeguards exist for a reason

While these proposals may be motivated by good intentions and a desire to strengthen Canada's economy during a period of global uncertainty, several of the proposed reforms risk establishing dangerous precedents that could weaken the very safeguards Canadians rely on to protect clean water, biodiversity, public health, communities, and future generations.

Environmental laws and regulatory safeguards were not created arbitrarily. They exist because Canadians have repeatedly witnessed the environmental, social, economic, and public health consequences of inadequate oversight, weak protections, and short-sighted decision-making. Many of the safeguards now being viewed as obstacles were created in response to real environmental harm, species declines, water contamination, industrial disasters, and public demands for greater accountability and transparency.

Treating environmental protections primarily as sources of delay risks ignoring the broader purpose they serve. These laws exist not only to protect ecosystems, but also to protect communities, public health, economic stability, cultural values, and future generations from avoidable harm and long-term costs. Weakening protections may create the appearance of efficiency in the short term, but can ultimately create far greater environmental, financial, legal, and social liabilities over time.

History has shown that when environmental laws are weakened, the impacts are often long-lasting and expensive. Communities are left dealing with contaminated water, damaged ecosystems, public health concerns, abandoned industrial sites, biodiversity loss, and significant public cleanup costs. In many cases, it is taxpayers and future generations who ultimately bear those burdens.

Environmental justice and future inequities

We are also concerned about the environmental justice implications of weakening federal oversight and accelerating approvals without adequate safeguards. Historically, the environmental and health burdens associated with poorly planned industrial development have disproportionately affected Indigenous communities, rural communities, lower-income populations, and communities with less political influence.

If environmental assessments become narrower, protections weaker, and political discretion stronger, there is a significant risk that communities already facing social, economic, or environmental vulnerabilities will bear a disproportionate share of future harms. These impacts can include water contamination, reduced access to traditional lands and resources, air pollution, cumulative industrial impacts, and increased public health risks.

There is also a growing concern that weakened oversight could increasingly enable situations in which corporations, including multinational and foreign-owned companies, extract wealth and resources while local communities, taxpayers, and future generations are left to bear the environmental, social, health, and financial costs. Canada has seen too many examples where profits leave communities quickly, while contaminated sites, damaged ecosystems, infrastructure pressures, and long-term cleanup liabilities remain for decades.

Environmental justice requires more than faster approvals. It requires fair processes, meaningful participation, transparent decision-making, and equitable protection from environmental harm. These principles must remain central to federal decision-making.

Transfer of powers and political discretion

We are deeply troubled by proposals that would transfer greater authority and discretionary powers to Ministers or Cabinet while reducing the role of independent review processes and scientific oversight.

Independent regulatory and assessment processes exist for a reason. They help provide checks and balances, transparency, consistency, and evidence-based decision-making that are intended to withstand changing political priorities and economic pressures. Concentrating greater authority in political offices risks creating systems where decisions are increasingly shaped by short-term political considerations rather than long-term public interest.

While current governments may act with good intentions, laws and powers created today will also be used by future governments. Expanding discretionary powers without strong safeguards creates long-term risks that future governments may misuse or apply in ways never originally intended.

Canada should be cautious about creating regulatory systems that depend too heavily on political discretion rather than strong, transparent, rules-based processes grounded in science, accountability, and public trust.

Species at risk and ecosystem protection

We are particularly concerned about proposals that could weaken or bypass protections for species at risk and sensitive ecosystems.

Species protections exist precisely because short-term economic pressures have historically led to long-term ecological decline. Once species and ecosystems are lost, they are extraordinarily difficult, and often impossible, to recover. Canada is already facing significant declines in biodiversity, habitat fragmentation, and ecosystem stress driven by industrial development, climate change, and cumulative impacts.

At a time when scientists around the world are warning about accelerating biodiversity loss, weakening species protections would move Canada in the wrong direction. Species at risk legislation should not be treated as an inconvenience to development, but rather as a critical safeguard intended to prevent irreversible ecological damage.

Healthy ecosystems are also foundational to healthy communities and economies. They support clean water, fisheries, agriculture, flood mitigation, recreation, tourism, climate resilience, and cultural values. Weakening ecosystem protections risks undermining the very natural systems Canadians rely upon.

Navigation permits and fish habitat offsetting

We are also concerned by proposals that could narrow the types of activities requiring federal permits, particularly related to navigable waters and fish habitat protections.

Canada's waterways are central to our ecology, economy, recreation, culture, and identity. Weakening oversight related to navigation protections risks reducing accountability for activities that may damage rivers, lakes, wetlands, coastal areas, and public access to waterways.

We are apprehensive about increasing reliance on habitat offsetting as a substitute for avoiding environmental harm in the first place. While offsetting may have a role in limited circumstances, it should not become a mechanism that normalizes or justifies habitat destruction.

In practice, habitat offsetting often carries significant uncertainty. Recreated or restored habitats may take decades to function properly, if they succeed at all, and may never fully replace the ecological complexity, biodiversity, or cultural importance of what was lost. In many cases, the most effective and responsible approach is to avoid damaging critical habitat altogether.

Early construction and pre-approval activities

We caution against proposals that would allow early construction activities or project-related work to proceed before environmental assessments and approvals are fully completed.

Allowing activities such as road building, clearing, site preparation, or infrastructure development before reviews are finalized undermines the integrity and credibility of the assessment process itself. Once physical development begins, there is often substantial political, financial, and

psychological pressure to approve projects regardless of unresolved environmental concerns or community opposition.

This risks creating situations in which assessment processes are perceived as procedural formalities rather than meaningful decision-making tools. Public trust in regulatory systems depends on the understanding that decisions have not already been made before assessments conclude.

If Canada is to maintain credible environmental review systems, projects should not advance into physical development stages until assessments, consultations, and permitting processes are fully completed.

Recommendations for Consideration

Canada should focus on improving the efficiency and effectiveness of regulatory systems without reducing environmental protections or public accountability. We recommend the federal government consider the following approaches:

Improve government capacity and coordination

- Increase staffing and technical capacity within regulatory agencies;
- Improve coordination between jurisdictions and departments;
- Enhance early planning and cumulative effects assessment;
- Modernize data sharing and transparency systems;
- Provide clearer guidance, timelines, and expectations for proponents.

Strengthen project readiness requirements

A significant source of delays and inefficiencies often stems from proponents entering regulatory processes without adequate preparation, incomplete information, weak environmental studies, or insufficient understanding of regulatory requirements and community concerns.

The federal government should require stronger project readiness standards before projects formally enter review processes. This could include:

- Minimum quality standards for applications and baseline studies;
- Demonstrated understanding of environmental and regulatory requirements;
- Mandatory pre-submission engagement with regulators;
- Training and educational supports to help proponents understand expectations and requirements before entering formal review processes.

Improving the quality and completeness of applications at the outset would likely reduce delays, repeated information requests, and procedural inefficiencies later in the process.

Strengthen community engagement and public trust

Projects are far more likely to succeed when communities are engaged early, treated respectfully, and given meaningful opportunities to influence project planning and decision-making. Community trust and social acceptance are foundational components of durable, successful, and economically stable projects.

Meaningful engagement should occur long before projects formally enter environmental assessment and permitting processes. Proponents should be expected to do the work upfront by building relationships, understanding community priorities, identifying concerns, discussing opportunities and benefits, and demonstrating how projects align with the long-term interests of affected communities.

The federal government should therefore require stronger early and ongoing community engagement by proponents, including:

- Early engagement before project designs are finalized or projects enter formal assessment processes;
- Demonstrated relationship-building efforts with local and Indigenous communities before projects proceed to environmental assessment;
- Transparent sharing of information related to opportunities, benefits, risks, uncertainties, and potential impacts;
- Meaningful opportunities for communities to influence project planning and outcomes;
- Demonstrated efforts to address community concerns and priorities;
- Clear plans outlining long-term community benefits, local value creation, and measures to avoid long-term environmental or social burdens;
- Ongoing communication throughout project development, operations, closure, and post-closure phases;
- Accessible public reporting and accountability mechanisms.

Communities should not be treated as obstacles, afterthoughts, or nuisances within project development processes. They should be treated as essential partners and long-term investors in the future of the places where projects are proposed. Local residents and Indigenous communities invest their health, landscapes, waters, livelihoods, infrastructure, culture, and quality of life into these decisions. In many cases, they will live with the consequences of projects long after proponents, investors, or governments have moved on.

Strong engagement processes should not focus solely on minimizing risks or opposition. They should also help ensure that projects create meaningful and lasting benefits for communities, including long-term economic opportunities, local employment, infrastructure improvements, environmental protections, and community well-being. Communities should not be left carrying long-term environmental, social, or financial burdens in exchange for short-term economic gains that primarily benefit outside interests.

Projects that secure meaningful community understanding, trust, participation, and long-term benefits are far more likely to proceed efficiently and avoid conflict, delays, reputational harm, and

litigation. Strong community engagement should be viewed as an essential part of responsible project development and good governance, not as a procedural hurdle to overcome.

Maintain strong environmental protections

Strong environmental protections are essential not only for protecting ecosystems and species, but also for protecting public health and maintaining public trust, accountability, economic stability, and confidence in Canada's regulatory systems. Environmental laws help ensure that development occurs responsibly and that decisions are grounded in science, transparency, fairness, and long-term thinking rather than short-term political or economic pressures.

Weakening protections or concentrating authority behind closed doors risks undermining confidence in institutions and increasing public skepticism, conflict, and polarization around major projects. In contrast, transparent and accountable processes help create certainty, credibility, and legitimacy for governments, proponents, communities, and investors alike.

The federal government should therefore maintain and strengthen:

- Species at risk protections;
- Independent scientific review;
- Public participation opportunities;
- Indigenous consultation and participation;
- Cumulative effects assessment;
- Environmental justice considerations within federal decision-making frameworks;
- Transparency and public reporting requirements;
- Independent oversight and accountability mechanisms.

Canada's environmental laws also reflect broader national values, including stewardship, fairness, responsibility to future generations, respect for nature, democratic participation, and the understanding that healthy environments are foundational to healthy societies and economies. Maintaining strong protections is not simply about regulation. It is about preserving the principles, public trust, and natural systems that help define Canada as a country.

Strong environmental protections should not be viewed as barriers to prosperity or nation-building. They are part of what ensures development is credible, durable, publicly supported, and aligned with Canadian values. These approaches improve efficiency, strengthen public confidence, and help ensure development proceeds responsibly and sustainably without reducing protections.

Conclusion

Regulatory certainty does not come from weakening laws or reducing environmental protections. It comes from strong, credible, transparent, and legally durable processes that communities, Indigenous nations, proponents, investors, and the public trust.

We are concerned by growing narratives suggesting that environmental protections are primarily responsible for delays, economic uncertainty, or barriers to development. This framing is misleading and risks sending Canada down a dangerous path. Environmental safeguards are not

the problem. More often, inefficiencies arise from inadequate project preparation, incomplete applications, insufficient early engagement, poor coordination, and the increasing complexity of projects themselves.

Canada must be careful not to treat environmental protection as though it exists in opposition to economic prosperity or national interests. Our environment is the foundation of our health, communities, economy, culture, and quality of life. It supports industries, jobs, tourism, recreation, food systems, climate stability, and the natural spaces that shape Canadian identity. Canada's natural environment is not simply a resource base. It is part of who we are as a country and part of what Canadians value most about this nation.

Projects that proceed through weakened or rushed processes are more likely to face public opposition, litigation, delays, reputational harm, and long-term conflict. In contrast, projects developed through rigorous, transparent, participatory, and science-based processes are more likely to secure social acceptance and long-term stability.

Canada faces real economic and geopolitical challenges, and there is a legitimate need to build infrastructure and transition projects more effectively. But this moment should not be used to weaken environmental safeguards that protect people, ecosystems, and future generations.

If Canada's response to international pressure is to weaken the very protections that distinguish us as a country, we risk eroding not only environmental safeguards, but also public confidence in our institutions and decision-making processes. In that sense, many of these proposed changes feel fundamentally inconsistent with the values Canadians expect their governments to uphold.

The decisions made today will shape Canada's landscapes, waters, biodiversity, communities, and economy for decades to come. In attempting to solve one problem, regulatory inefficiency, Canada must avoid creating far greater long-term risks through the erosion of environmental protections, scientific integrity, democratic oversight, and environmental justice.

We urge the Government of Canada to focus reforms on improving efficiency and coordination while maintaining, and where necessary strengthening, environmental laws, species protections, Indigenous rights, scientific integrity, public accountability, and environmental justice.

Canada does not need to choose between a strong economy and strong environmental protections. Long-term prosperity depends on both.