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

November 17, 2026

The Honourable Susan Holt
Premier of New Brunswick
Government of New Brunswick

Dear Premier Holt:

Subject: Pause high-risk industrial approvals until New Brunswick meets its environmental commitments

New Brunswickers should be able to count on their government to protect the water they drink, the air they breathe and the lands they depend on. A healthy environment is the foundation for healthy people, thriving communities and a strong economy. The idea that we must "balance" the environment and the economy treats them as competing interests, even though our economy depends on clean water, healthy forests, productive soils and a stable climate. Decisions that overlook those connections have helped drive the crises we face today in biodiversity loss, climate change and pollution.

Your government's record to date gives the Conservation Council of New Brunswick too little confidence that it will deliver on its environmental responsibilities. Annual reports are overdue, stronger pollution rules are years away, and two major spills have exposed gaps in prevention and public warning. Yet your government is considering major new industrial developments and reviewing the fracking moratorium.

We are asking your government to maintain the fracking moratorium and pause approvals for new or expanded high-risk industrial projects until it can show that it is meeting its existing environmental responsibilities.

Environmental commitments are going unfulfilled

Forest reporting has fallen behind. When the province released its 2023 *State of the Forest* report, it committed to reporting annually. The province's forest planning page still links to the

2023 edition, the most recent public edition we could find. Without up-to-date reporting, New Brunswickers have no consistent way to track how Crown forest management affects older forests, wildlife habitat, and watersheds, or whether the province is meeting its own conservation commitments.

New Brunswick needs an updated biodiversity strategy. The province's last strategy dates to 2009, and an update was expected in 2025. Your government should publish and fund a new strategy that sets clear priorities for protecting habitat, restoring damaged ecosystems and helping species at risk recover. We welcome the Shared Landscapes Initiative as one way to put that strategy into action. It can help New Brunswick meet its 15% protected area target and lay out a path to 30%. However, we remain concerned that the province will choose areas that are easier to set aside while leaving some of New Brunswick's most important natural habitats unprotected. In addition, we are concerned about the health of currently protected areas. Revisions to the over 20-year-old Protect Natural Areas Act are urgently needed to ensure protected areas are truly protected from industry encroachment and damage.

The province's own modelling shows that current policies fall well short of net zero. The Net Zero Blueprint , quietly released this August, shows that under current policies, New Brunswick will fall short of its commitment to reach net zero by 2050. Yet this year, your government disbanded the Climate Change Secretariat, the team responsible for coordinating the province's climate action plan. Many of the Blueprint's milestones are set for 2040. In the meantime, approving new fossil fuel infrastructure could lock in emissions for decades, making the province's commitments even harder to meet. Your government needs to recommit to tackling climate change by publishing and funding a plan that cuts emissions now, sets clear targets for this decade and reports progress every year. That means ending provincial investment in new fossil fuel infrastructure and withholding approvals for any new fossil fuel projects.

The government needs to show progress on its own buildings and vehicles. Your mandate letter to the Minister of Transportation and Infrastructure commits to making all government buildings net zero and electrifying the government fleet, including school buses, by 2035. The provincial climate action plan also called for a plan by 2024 to cut emissions from government buildings and vehicles by 20 to 40% by 2030. We have yet to see clear government-wide figures on fleet electrification, building upgrades or the emissions reductions those measures have delivered

The Environmental Trust Fund is drawing down its reserves. Its dedicated revenue from beverage-container fees ended in 2024. Your government has consulted on the fund's future, and communities are still waiting for a lasting source of funding for work such as watershed monitoring and habitat restoration.

Gaps in legislation, funding and enforcement

Your government voted against Bill 23, which would have recognized the right to a healthy environment in provincial law. Your environment minister said the government would strengthen protections through existing laws. New Brunswickers are still waiting for those stronger protections.

Updates to the *Clean Air Act* and *Clean Water Act* are underway. Your mandate letters commit to updating both laws to guarantee every New Brunswicker's right to clean air and water. Where does that commitment stand? Community members, First Nations, and environmental and health professionals have offered recommendations (e.g. Recommendations for the Clean Air Act; Recommendations for the NB Clean Water Act). Which ones will your government act on, and when will the new protections take effect? The draft Air Quality Regulation is already cause for concern. Under the draft, updated outdoor air pollution limits would apply only from January 2032. In the meantime, proposed mines, gas plants and large data centers with on-site combustion can be assessed and approved under older rules that lag behind current science. New projects should be assessed against up-to-date, health-based standards before approvals are granted.

Even strong rules depend on people being there to enforce them. Departments need enough inspectors to visit facilities before complaints come in, enough technical staff to verify what companies report, and enough capacity to follow up on violations. The Woodstock diesel leak, one of the largest of its kind in Canada, came to light only after petroleum odours were detected in a nearby drinking-water well. Earlier this year, the public was allowed to travel through a highly visible toxic chemical spill near Fredericton for days before the government responded to the incident. These recent examples raise serious concerns about the government's ability to protect our environment and human health.

Taxpayers are already on the hook for industrial damage

New Brunswick has a long history of allowing industrial activity to proceed and leaving the public responsible for part of the cleanup. As of March 31, 2026, the province had recorded **$87.9 million in estimated cleanup costs for contaminated sites it is responsible for**, including **$78.4 million for four sites with mining-related contamination**. The Auditor General previously warned that weak oversight and delays can let contamination spread and drive-up cleanup costs. Before approving more industrial development, your government needs to show how it will prevent that pattern from repeating.

What we are asking your government to do

Maintain the fracking moratorium and pause provincial approvals for new or expanded high-risk industrial projects. Redirect staff time and public dollars from efforts to reopen fracking and advance contested developments toward protecting drinking water, monitoring pollution and enforcing existing rules. Before resuming high-risk approvals, show that the province has the standards, staffing and emergency response capacity to protect people and the environment. Assess the combined impacts of existing and proposed developments and uphold First Nations' rights throughout the process.

Fund the departments responsible for protecting public health and the environment. Provide the staff and resources needed for routine inspections, independent air and water testing, enforcement follow-up and prompt public alerts. Publish what was inspected, what violations were found and whether they were corrected.

Strengthen air, water, and protected areas laws and make polluters pay. Respond publicly to the recommendations from environmental and health professionals and apply updated health-based air standards to new facilities from the start. Revise the Protect Natural Areas Act to remove loopholes and ensure protected areas are truly protected. Require companies to post enough financial security before work begins to cover closure, cleanup, and long-term monitoring or treatment. Recover public cleanup costs from responsible companies wherever possible.

Deliver the commitments already on the books. Resume annual forest reporting, release a funded biodiversity strategy, safeguard existing protected areas, meet the 15% target and lay out a path to 30% by protecting areas that matter for biodiversity. Set near-term emissions milestones and report annually on emissions from government buildings and vehicles. Secure a lasting revenue source for the Environmental Trust Fund.

Premier Holt, your government says it is protecting New Brunswick's environment while moving ahead with major new developments. Its record gives New Brunswickers reason to question that assurance. **If your government cannot meet the environmental responsibilities it already has, how can New Brunswickers trust it to manage the risks of more development?**

Publish the overdue reports, strategies and plans, and fund the work they call for. Strengthen environmental laws and regulations, and put enough staff in place to monitor air and water, inspect facilities and enforce the rules. Keep existing protected areas protected, meet the 15% target and lay out a clear path to 30% choosing areas that matter for biodiversity. Start cutting greenhouse gas emissions now and report the reductions this decade. Clean up contaminated sites, hold polluters responsible for the costs and prevent new contamination. **This is the work your government needs to do now to address biodiversity loss, climate change and pollution**

and prove to New Brunswickers that this government can protect our environment and human health.

Listen to the people you serve, especially those who live closest to industrial sites and already bear the burden of pollution. Environmental justice means asking who benefits from a project, who bears the risks and whose voice carries weight in the decision. When a community already lives with industrial pollution, assess what another project would add to the burden people face, and show how that shaped your decision. Listen early enough for people's input to change the outcome, and uphold First Nations' rights throughout the process.

Do the work, meet your commitments and make the results public before rushing ahead with more high-risk development. That is how your government can earn the trust it is asking New Brunswickers to place in it.

Sincerely,



Beverly Gingras
Executive Director
Conservation Council of New Brunswick