



Submission by East Coast Environmental Law Association on Canada's 2030 Biodiversity Strategy

Introduction

In response to the Kunming-Montreal Global Biodiversity Framework (KMGBF) that was adopted on December 19, 2022, Canada is developing a new national Biodiversity Strategy. The 2030 Biodiversity Strategy will create a vision for preventing biodiversity loss in Canada and guide how the KMGBF will be implemented. The Strategy will be drafted in 2023 and will be informed by [overarching principles](#) including a commitment to urgent and ambitious action; taking a comprehensive, whole-of-society approach; and seeking transformational change.

Before the detailed content of the Strategy is drafted, Government is engaging with Canadians to inform its development. Engagement between Environment and Climate Change Canada (ECCC) and Canadians began in May 2023 and will continue until December 2023. From May 15 to July 14, 2023, the Government of Canada opened a [survey](#) to seek public views and perspectives to inform the development of Canada's 2030 Biodiversity Strategy. The survey provided a list of questions and sought responses to those questions through an online portal.

The following responses were submitted by the East Coast Environmental Law Association to the ECCC public engagement portal on July 14, 2023. Some of the responses were edited before being submitted to fit the 1000-character limit per question.

What are the key features of a successful 2030 National Biodiversity Strategy?

The 2030 National Biodiversity Strategy should...

- *Be visionary*, by embracing a vision for Canada that surpasses the Global Biodiversity Framework setting ambitious targets and demonstrating national leadership in biodiversity conservation.
- *Facilitate a paradigm shift*, by positioning humans as part of biodiversity, rather than mere consumers of its services, fostering a deeper understanding of our interconnectedness.
- *Recognize Indigenous rights and knowledge* by seeking to restructure laws, policies, and decision-making processes to recognize and accept Indigenous rights and knowledge as essential for reconciliation and by embracing Indigenous values and sustainable approaches.
- *Establish clear and measurable goals and targets* and providing a framework for monitoring progress and ensuring accountability.

- *Include a formal coordinating mechanism* involving federal, Indigenous, provincial, and territorial governments to facilitate collaboration, coordination, and effective implementation of the strategy.
- *Introduce public-facing legal accountability mechanisms* that hold governments at all levels responsible for meeting goals and targets to ensure transparency and progress toward biodiversity conservation.
- *Prioritize investment* in policies, plans, programs, actions, and activities that halt and reverse biodiversity loss and divest from those that may accelerate loss.
- *Take an intersectional approach* recognizing and addressing the intersection of climate change, pollution, and biodiversity loss to allow for integrated solutions.
- *Establish a comprehensive biodiversity education program*, spanning formal curriculum to social media that demonstrates the government's unwavering commitment to transformational change to inspire public support and foster a sense of collective responsibility.

What are the most significant challenges and opportunities to achieving the KMGBF 2030 targets in Canada? What successful initiatives could we build upon?

Significant challenges. At its root, progress is hindered by public inertia and denial of the triple planetary crisis. Government inertia and fear of political risk impede action and jurisdictional dissention complicates coordination. Greed and financial influence prioritize short-term gains over long-term sustainability, making government's role in balancing support for entrepreneurial advances with regulatory oversight crucial. Additionally, resource-based economies such as Canada's are resistant to change. Overcoming these challenges will require a collective effort, policy reforms, public awareness, and sustainable economic diversification.

Opportunities. The caliber of education and scientific research capacity in Canada provides a strong foundation to achieve global biodiversity targets. Government can draw on this depth of knowledge found in government and non-government institutions and through coordination and collaboration facilitate biodiversity research, monitoring, and public education. An engaged and committed federal government can drive meaningful action by mobilizing human and financial resources to meet the biodiversity targets and goals. Seizing these opportunities requires sustained investment in research, cooperation across government, effective, enforceable, and accountable regulation, public engagement, and leveraging significant financial resources to support biodiversity conservation.

What measures should be prioritized and implemented as soon as possible to ensure we meet the 2030 targets and are on track to reach the longer-term 2050 goals?

Establish a formal governance mechanism to coordinate all levels of government and ensure that biodiversity goals and targets are integrated into the mandates of government ministers.

Complete Nature Agreements with provincial and territorial governments to facilitate tangible progress toward biodiversity goals. The agreements should include implementation and enforcement of relevant provincial legislation addressing key biodiversity concerns such as species protection, land conservation, wetland conservation, coastal environment preservation, etc.

Implement transformational budget measures that enable both government and private sector action to meet biodiversity goals and targets. This includes allocating adequate financial resources to support education, regulation and action and incentivize initiatives that contribute to biodiversity conservation.

Integrate biodiversity and climate lenses into legislation and policies governing program and project decision-making. This integration should extend to key legal frameworks such as the *Impact Assessment Act*, *Clean Electricity Regulations*, *Pest Control Products Act*, *CEPA*, and *Accord Acts*, ensuring that biodiversity and climate considerations are mainstreamed and prioritized.

Develop a national biodiversity law that ensures legal and public accountability for meeting biodiversity goals and targets. This law would provide a framework for setting standards, reporting on progress, and enforcing actions related to biodiversity conservation.

No target is an island: What overarching tools and solutions hold the most potential for making progress across multiple targets?

Making progress across multiple biodiversity targets requires a range of tools and solutions. First and foremost, real, and demonstrable government commitment is paramount. Governments must recognize the magnitude of the crisis and demonstrate their dedication through clear communication, budget allocations, and tangible actions.

Accountability legislation setting out targets with clear accountability measures will provide a framework for progress by setting specific goals and holding governments accountable for achieving them. This includes regular reporting on progress, transparent monitoring, and evaluation systems, and consequences for failure to meet targets.

Education plays a vital role in fostering awareness and understanding of biodiversity. Formal and informal education programs are essential for raising public awareness, changing behaviors, and cultivating transformational change. Education should span all age groups and include curricula that emphasize biodiversity conservation and ecological literacy.

Collaborative leadership is crucial for effective implementation; government agencies, indigenous communities, non-governmental organizations, and businesses, must work together to develop and implement strategies. Collaborative approaches can foster innovation, and leverage diverse expertise, resources, and perspectives.

Financial resources directed toward meeting targets are indispensable. Governments must allocate sufficient funds to support biodiversity conservation and restoration initiatives. These funds should be accompanied by clear accountability mechanisms to ensure transparency and proper utilization of resources.

What additional knowledge and enabling mechanisms (e.g., networks, policies) are critical to inform implementation decision-making at all levels?

Ongoing collection of baseline scientific data on biodiversity, coupled with aggressive and accountable monitoring. This data provides essential information on the state of biodiversity, identifies trends, and enables evidence-based decision-making. Mechanisms to maximize the gathering, coordination, and networking of grassroots information are essential.

On-the-ground stakeholders, including local communities, NGOs, and citizen scientists, play a valuable role in monitoring and providing information on biodiversity. Establishing platforms for collaboration, knowledge sharing, and data exchange enhances the accuracy and relevance of decision-making.

Accountability and transparency are fundamental principles in decision-making processes. Robust mechanisms for accountability ensure that decisions align with biodiversity targets and are based on scientific evidence. Transparency promotes public trust, fosters engagement, and allows for scrutiny and participation in decision-making, ultimately enhancing the effectiveness and legitimacy of implemented actions.

In drafting 2030 National Biodiversity Strategy what individuals', communities', or organizations' perspectives, knowledge, and skills should be meaningfully amplified to make progress on reducing threats to biodiversity?

The government must recognize Indigenous rights and jurisdiction and should engage in shared decision-making processes, empowering Indigenous communities to participate in shaping biodiversity policies. Additionally, formal mechanisms to recognize the role of Indigenous knowledge, practices, and stewardship is essential for sound and holistic approaches to biodiversity conservation.

Civil society, particularly the non-profit sector, holds immense knowledge and skills. Non-profit organizations focused on environmental protection bring valuable expertise and on-the-ground experience. Their contributions should be recognized and valued on par with similar services provided by the private sector. Strengthening partnerships between government and non-profit organizations can leverage their expertise, foster collaboration, and enhance the effectiveness of biodiversity conservation efforts.

Meaningful engagement and collaboration with individuals, communities, and organizations will be key to ensuring the strategy's effectiveness and promoting inclusive and sustainable biodiversity conservation.

What are the key human needs and values to be addressed to make biodiversity loss a mainstream concern?

The key human needs and values to make biodiversity loss a mainstream concern are no different than the ones we have grappled with over many decades to make conservation and environmental protection a mainstream concern. A sense of interconnectedness and interdependence with the environment and a recognition that we are each individually part of the ecosystem that supports us is the crux. To get there, education and awareness are key but to be effective government must lead aggressively on all fronts of the biodiversity crisis.

By way of example, government decisions cannot ignore the effects on biodiversity when faced with other “more immediate” crises. Destroying vast tracts of wetland for housing development because of the housing crisis or allowing deep sea mining in areas that are completely unknown to us because of the climate crisis are short-term answers that will have deep, long-term impacts.

There is of course a need to connect humans to biodiversity in a more pragmatic way, by illustrating potential positive economic opportunities that will support livelihoods and engaging individuals and communities in actions that can contribute to solutions.

However, the influence of government policy, programming and legislation cannot be overstated. It is always a multifactorial, multidisciplinary approach that leads to the most effective and lasting success. The health of the ecosystem has to be the number one role of government – it must be considered at the forefront of every other decision. Governments must demonstrate leadership, prioritize ecosystem health, and adopt a comprehensive approach that includes scientific research, education, regulation, and enforcement.

What does success look like?

Success would be marked by a shift in human understanding, behavior, and values toward biodiversity. It would involve recognizing interconnectedness, realizing the unsustainability of current practices, and embracing a new and different relationship with the natural environment. It would include changes in language and terminology, moving away from a perception of managing the environment as a separate entity and toward integrated approaches that recognize our role as part of the natural world.

Government commitment, leadership, and policy alignment would be integral to achieving this vision of success. This transformational change would see governments allocate resources to support and incentivize regenerative activities over harmful ones. Policies and regulations would be crafted through an integrated biodiversity and climate lens, considering the long-term impacts on ecosystems and prioritizing conservation. Harmful activities such as deep-sea mining, offshore oil and gas development, and industrial aquaculture would be critically evaluated, and alternative, sustainable approaches would be prioritize.