

July 22, 2026

SeaBlue Canada Comments on Discussion Papers, “Getting Major Projects Built in Canada” and “Strengthening One Canadian Economy through trade and transportation”

[SeaBlue Canada](#) makes the following submission for the consultations in respect of two discussion papers published by the Government of Canada on May 8, 2026: “[Getting Major Projects Built in Canada - Discussion Paper on Proposed Legislative, Regulatory, and Policy Reforms](#)” (Major Projects Paper) and “[Strengthening One Canadian Economy through trade and transportation](#)” (Trade and Transportation Paper)

SeaBlue Canada is a joint project of eight of Canada’s most active and well-respected environmental NGOs, each with specialized expertise in marine conservation. Founded in 2016, SeaBlue Canada’s mission is to help Canada address the biodiversity crisis facing Canada’s ocean ecosystems. SeaBlue Canada’s primary focus is ensuring the successful implementation of the marine conservation targets (30x30). Many of the organizations that make up SeaBlue Canada have made individual submissions during the consultation period. This submission focuses specifically on the impacts of the proposals in the discussion papers to Canada’s marine protected areas (MPAs).

SeaBlue Canada is extremely concerned that the proposals contained within the discussion papers threaten Canada’s marine conservation regime and undermine the recently released [A Force of Nature: Canada’s Strategy to Protect Nature](#).

Since 2016, Canada has made great progress on ocean conservation. In 2015 approximately 1% of Canada’s ocean was protected. Today that number stands at 17.65%. Recognizing that protected areas are only as effective as the quality of their legal protection, in 2023 Canada issued an [MPA Protection Standard](#) that lists activities that must be legally prohibited in MPAs. Canada is also moving past colonial models of ocean conservation by partnering with Indigenous nations to develop Indigenous-led marine conservation projects, such as the [Great Bear Sea MPA Network](#), among others. These models are now being looked to from across the world as best practices in conservation.

On March 31 2026, Canada issued *A Force of Nature: Canada’s Strategy to Protect Nature* in which Canada affirmed its goal under the [Kunming-Montreal Global](#)

[Biodiversity Framework](#) of protecting 30% of Canada's ocean space by 2030 and committed to:

- allocate hundreds of millions of dollars to strengthen the protection and recovery of species at risk across Canada, and
- allocate hundreds of millions of dollars to protect fish and fish habitat, to restore vulnerable Pacific salmon populations and their habitat, and to stabilize and rebuild wild Atlantic salmon populations through targeted restoration of habitat.

A commitment to ocean conservation was also made via the [Spring Economic Statement](#), in which additional funds were earmarked to specifically address threats to whales.

SeaBlue Canada acknowledges the importance of building a stable, independent and resilient economy, particularly in current geopolitical times. The coalition is also supportive of an increased focus on process efficiencies. However, the discussion papers propose measures that put our natural capital at undue risk and are drastically at odds with the commitments outlined above.

The two discussion papers outline a radical overhaul of Canada's environmental legal framework. The proposals make sweeping amendments to many of Canada's most important environmental statutes, including the [Fisheries Act](#), [Species at Risk Act](#), and the [Impact Assessment Act](#). These proposed changes could affect the survival of marine species and protected ecosystems, threaten the progress Canada has made on marine conservation, and undermine the commitments that Canada recently made in *A Force of Nature*. For MPAs specifically, the ambiguous language and lack of detail in the discussion papers could invite serious and unintended effects on how decisions that impact MPAs are made.

In our proceeding commentary, we explain how marine conservation commitments could be undermined by the Government of Canada's proposals:

1. Streamlining Approvals for Projects that Impact MPAs is Not Appropriate

The Government of Canada proposes streamlining approval of major industrial projects. For offshore energy projects and transboundary pipelines, it proposes that these projects would be overseen by the Canadian Energy Regulator (CER) and would not require an impact assessment under the *Impact Assessment Act*. For pipelines with lengthy routes, the federal Cabinet would make a determination as to whether the project is in the "national interest" before completion of environmental review. For the Newfoundland and Labrador and Nova Scotia offshore areas, the federal government is assessing how to achieve a single regulatory model for projects.

Moreover, the Government of Canada proposes:

- significantly shortening the approval time for review and approval of projects;
- reviewing regulatory permits while the assessment of a project is ongoing; and
- allowing some early construction activities to start before an impact decision is made, if the necessary permits are approved.

This streamlined approach would significantly weaken Canada's environmental safety net that protects communities and ecosystems. In particular, it must not be applied to decisions that impact MPAs (especially those that are Indigenous led) because specific governance and management frameworks and bodies have been developed over years to ensure that:

- the specific goals of the MPA are achieved,
- Indigenous rights are respected, and
- local community concerns are heard.

Approving projects in MPAs or those that impact MPAs under the proposed approach would undermine the democratic processes, relationships, and trust that have been created to ensure MPAs are resilient, effective, responsive to community needs, and sustainable.

2. Federal Economic Zones/National Trade Corridors are Not Consistent with Marine Conservation

A key component of the Major Projects Paper allows the Governor in Council (i.e., the federal Cabinet) to designate Federal Economic Zones, which would allow projects to be pre-approved and would remove the need for separate project reviews.

Moreover, in the Trade and Transportation Paper, the Government of Canada proposes amendments to the [Canada Transportation Act](#) to allow the Minister of Transportation to designate "National Trade Corridors" connected to ports where performance goals could be set, and efficiency and speed of trade emphasized.

It is unclear from the discussion papers how these new designations overlap with one another. The Major Projects Paper defines Federal Economic Zones as areas where intensive industrial activities will occur with fewer environmental safeguards. In the case of the Trade and Transportation Paper, marine National Trade Corridors are areas that would experience increased shipping activity where polluting operational discharges, underwater noise and physical disturbances to whales and other species would be intensified. Given the dynamic nature of the ocean, both of these newly proposed zones, if they overlap with or are near MPAs, would threaten the integrity of MPAs. Even outside of MPAs, measures to protect

Species at Risk Act (SARA) listed species, such as the Southern Resident Killer Whales, could be undermined without environmental safeguards.

If Canada wishes to provide more clarity on where projects are appropriate in Canada's ocean estate, there are existing marine conservation initiatives, such as the [Marine Conservation Network Plan for the Scotian Shelf-Bay of Fundy Bioregion](#), that Canada could complete. Releasing the Network Plan for the Scotian Shelf-Bay of Fundy Bioregion, which has been complete for nearly two years and is the product of decades of investment and planning, would signal that major project development and conservation are not at odds, but can be used to buoy one another. Moreover, the substantial investment that has already been made in the Network Plan would create efficiencies in project planning and investment clarity as the offshore becomes populated by offshore wind and renewed oil and gas interests.

3. Ports Must Respect the Marine Environment and MPAs

In the Trade and Transportation Paper, the Government of Canada proposes modernizing how ports are governed to create a more “business-focused” governance framework. A National Corridor Council will be created to provide a report with recommendations to the Minister of Transportation regarding Canada's ports, including whether to amalgamate some ports and divest (i.e. privatize) others. The Paper also states that more powers would be given to Canada Port Authorities, including the authority to manage all navigation interferences within their respective areas of administration. Moreover, in the Major Projects Paper, the Government of Canada proposes narrowing the types of activities that require navigation permits.

The “business-focused” powers and jurisdiction of these ports (whether they are private or public) cannot be enabled to infringe or impact on MPAs. Furthermore, business interests cannot supersede environmental protections, such as measures to protect SARA-listed species including Southern Resident Killer Whales.

4. Canada Cannot Extinguish Species in favour of Economic Expansion

Canada's commitments in *A Force of Nature* (as well as its international commitments) are not just intended to create protected areas but also to strengthen the protection and recovery of species at risk across Canada. The Government of Canada proposes to do the opposite by giving itself the power to permit projects that jeopardize the survival or recovery of a threatened or endangered species if those projects are considered in the “national interest”. As [reported by the Toronto Star](#), the amendment was proposed in particular to allow projects that would jeopardize the survival of the Southern Resident Killer Whale.

It is impossible to square this proposal with the commitments in *A Force of Nature*. It must be soundly rejected.

5. Fisheries and Fisheries Habitat Protection

In *A Force of Nature*, Canada committed hundreds of millions of dollars to restoring salmon populations and protecting fish habitat. Yet several of the proposals in the Major Projects Paper directly threaten fish and fish habitat. For certain projects, it appears that Fisheries and Oceans Canada will lose its decision authority over *Fisheries Act* authorizations, e.g. the “harmful, alteration, disruption or destruction of fish habitat” approval, and that authorizations could be issued before completion of assessments. That will mean less information and expertise to inform decisions. Moreover, it is not clear how or if fish and fish habitat will be protected within Federal Economic Zones.

Finally, the Government of Canada proposes making permits for fish and fish habitat more flexible for offsetting. According to the mitigation hierarchy which Canada has endorsed, including in *A Force of Nature (Pillar 2)*, offsetting should only be considered after avoiding, minimizing, or mitigating harm to habitats, and only to address minor residual adverse effects.

Canada must not pursue an economic strategy that sacrifices fish and fish habitat because they play a foundational role in coastal communities and ecosystems.

6. Disposal at Sea Protection Standard Must Be Upheld

Canada’s MPA Protection Standard prohibits the disposal at sea of a number of deleterious substances within MPAs. This prohibition, which is crucial for a quality MPA, also effectively prevents other harmful activities that require disposal at sea, such as finfish aquaculture, from happening in or adjacent to MPAs.

The Government of Canada is proposing to make “permits [...] more flexible [...] related to Disposal at Sea.” Canada must not undermine the MPA Protection Standard by permitting disposal at sea that threatens MPAs.

7. Conclusion

SeaBlue Canada is very concerned about how this proposal will impact Canada’s marine protected areas and the implementation of *A Force of Nature*. It is imperative that safeguards for MPAs, species at risk, and fish and fish habitat be incorporated into any new legislation or policy in order to ensure they do not undermine the principles of *A Force of Nature*.

The release of *A Force of Nature* was publicly lauded by our groups as a critical step in ensuring that nature in Canada is meaningfully protected. As stated by the Prime Minister during the announcement of this strategy, nature is central to Canadian identity, national security, resilience, and wellbeing. Conservation is also

a critical component of reconciliation with Indigenous peoples. The discussion papers directly undermine these principles and must be revisited with more consideration.

We urge you to return to the drawing board and design a strategy that ensures nature is not sacrificed in favour of short-term economic gain, but rather acknowledges that nature and a robust, efficient economy are mutually beneficial.

Our groups are available to support a process that emphasizes efficiencies in a way that is compatible with protecting our natural capital.