July 22, 2026

The Privy Council Office
Government of Canada
Submitted to engagement@pco-bcp.gc.ca.

Response to *Getting Major Projects Built in Canada* (May 8, 2026)

Dear Privy Council Office,

Thank you for offering an opportunity to comment on the Government of Canada's discussion paper, *Getting Major Projects Built in Canada*.

Founded in 1992, Polar Bears International (PBI) is a registered non-profit organization in Canada and the United States with projects spanning the circumpolar Arctic. Through research, education, policy, and international collaboration, we work to protect polar bears and their Arctic sea ice home. We are grateful for the opportunity to review this draft and provide comments.

While we support efforts to improve efficiency of project reviews in Canada, we are concerned by the ways this current plan weakens essential safeguards for the environment, species at risk, and the rights of Indigenous Peoples.

Exemption from Impact Assessments
Firstly, we strongly oppose the proposal to exempt major projects from environmental impact assessments. These evaluations play a vital role in identifying, avoiding, and mitigating negative impacts before irreversible damage occurs—while also providing transparency to the public about the risks involved and how final decisions are made. Rather than bypassing environmental impact assessments, we recommend the government invest in adequate staffing and scientific capacity for assessment bodies to expedite quality and timely reviews. It is also essential to prioritize the early engagement of all potentially affected communities.

Allowance of Early Construction
Similarly, we strongly oppose the proposal to allow some early construction activities to start before impact decisions are made. Early construction activities are not less damaging to the environment or to local communities and therefore should not be given any special exemption before a thorough assessment is completed. Such an approach has the potential to allow significant and irreversible harm to an ecosystem and the species and people who depend on it.

Exemption from Species at Risk Act Review
Finally, we strongly oppose the proposal to grant the Governor in Council the authority to exempt specific projects from the application of the Species at Risk Act's (SARA) jeopardy test––a move that would put already threatened species at greater risk. SARA's legally binding jeopardy test is an important safeguard for preventing further population declines for polar bears and all listed Canadian species. We urge the government to reject projects on legally protected critical habitat for SARA listed species.

Canada is home to most of the world's polar bears and therefore has a unique responsibility for the species' conservation. Polar bears are classified as Vulnerable on the IUCN Red List and as a Species of Special Concern under SARA—primarily due to ongoing and projected habitat loss from climate change. Because many potential major projects overlap with polar bear habitat, it is essential that the Canadian government maintains rigorous environmental standards throughout all stages of development to avoid further threatening the persistence of the species.

Canada can build major projects while protecting the environment, species at risk, and the rights of Indigenous Peoples—providing a model for how economic adaptability and environmental conservation can complement each other. To get there, federal decision-makers must champion a new approach, one that makes the environmental assessment processes more effective without forfeiting protections that support biodiversity and healthy communities.

Sincerely,

Alysa McCall
Director of Science
Polar Bears International
241 Kelsey Blvd
Churchill, MB R0B 0E0, Canada