



Pacific Wild

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Pacific Wild Alliance strongly opposes the proposal to override section 73(3)(c) of Canada's *Species at Risk Act* (SARA) as part of the "One Canadian Economy" initiative. As outlined in the discussion paper, this change would remove one of SARA's most critical safeguards: the requirement that federally authorized activities must not jeopardize the survival or recovery of endangered species.

This provision exists to ensure that development does not push already at-risk species closer to extinction. Weakening it would have far-reaching consequences for some of Canada's most vulnerable wildlife populations, including Southern Resident killer whales (SRKW) and woodland caribou, species that are already facing significant threats from habitat loss, ecosystem degradation, and cumulative industrial pressures. These species depend on healthy, functioning ecosystems that are increasingly under strain from human activity. Removing this safeguard would make it more difficult to ensure that federally authorized projects consider their impacts on species recovery and would risk undermining decades of conservation efforts aimed at preventing further declines and extirpations.

Canada is simultaneously investing millions of public dollars into recovery efforts for both SRKWs and Pacific salmon populations, including several Chinook salmon populations that are endangered or in serious decline and serve as the primary prey of SRKWs. The proposed change to SARA is therefore deeply paradoxical: it risks undermining or effectively nullifying taxpayer-funded recovery initiatives by permitting projects that could directly jeopardize the very species these investments are intended to protect and recover. In practice, this would shift public investment in conservation into a system where gains are eroded by regulatory rollbacks designed to expedite industrial development, benefiting a narrow set of interests while externalizing ecological costs to the public and future generations. That raises serious questions about accountability and democratic decision-making in environmental governance.

Similarly, we are deeply concerned about the implications of removing the jeopardy clause for boreal and mountain woodland caribou, whose populations across Canada continue to decline primarily due to habitat loss and disturbance. Woodland caribou are federally protected under SARA and the *Canada National Parks Act*, as well as under various provincial legislation, yet the primary driver of their decline remains unresolved. Since caribou were first protected under SARA in 2003, forest harvesting has disturbed on average over 1,600 square kilometres of

caribou habitat every year, a scale of cumulative old-growth loss that current protections have already struggled to contain. Removing the jeopardy clause would strip away one of the few remaining legal mechanisms compelling the government to weigh this cumulative impact before approving new logging, mining, and oil and gas projects in critical caribou habitats. Projects like the proposed Crawford Nickel Mine, which alone is slated to destroy nearly 11,800 hectares of legally designated critical habitat for threatened woodland caribou, illustrate exactly the kind of individual approval that the jeopardy clause exists to scrutinize, and that would proceed unchecked under the proposed reforms.

This is not a peripheral concern: caribou herds in Alberta, Quebec, and British Columbia are already sliding toward local extirpation, and governments have committed hundreds of millions of dollars toward habitat restoration and recovery in direct acknowledgment of how dire the situation has become. Weakening SARA now would actively work against those same public investments, permitting the continued industrial fragmentation of old-growth forest that caribou depend on for calving grounds and predator refuge, while taxpayers fund long-term recovery programs designed to reverse that very fragmentation. If Canada is serious about preventing further caribou extirpations, and about ensuring its conservation spending is not squandered, the jeopardy clause must remain intact as a binding check on projects that would push already fragile herds closer to the brink.

We support efforts to strengthen Canada's economy and sovereignty, but not at the expense of dismantling the legal protections designed to prevent extinctions. Scientists have warned that the current rate of biodiversity loss may indicate we are facing a sixth mass extinction, driven largely by human activity and habitat destruction. The proposal to override section 73(3)(c) of SARA is unfairly asking Canadians to accept accelerating biodiversity loss — and the resulting loss of critical ecosystem services and functions — as an acceptable cost of industrial expansion.

Sincerely,



Sydney Dixon
Marine Specialist



Dr. Kristen Weiss
Wildlife & Forests Specialist

cc: Honorable Dominic LeBlanc, President of the King's Privy Council for Canada
cc: Honorable Julie Dabrusin, Minister of Environment and Climate Change
cc: Honorable Mélanie Joly, Minister of Industry
cc: Honorable Randeep Sarai, Surrey Centre, Secretary of State (International Development)
cc: Honourable Stephanie McLean, Esquimalt—Saanich—Sooke, Secretary of State
cc: Honourable Hedy Fry, Vancouver Centre

cc: Honourable Terry Beech, Burnaby North—Seymour

cc: Honourable Jill McKnight, Delta, Associate Minister of National Defence

cc: MP Ernie Klassen, South Surrey—White Rock, Parliamentary Secretary to the Minister of Fisheries

cc: MP Will Greaves, Victoria

cc. MP Tamara Kronis, Nanaimo—Ladysmith