Pacific Wild
1529 Amelia Street
Victoria, British Columbia V8W 2K1
250-380-0547
info@pacificwild.org /www.pacificwild.org

October 23, 2026

The Chair and Members
Legislative Committee on Bill C-39
House of Commons
Ottawa, Ontario

Re: Bill C-39 — Building Canada Strong Act

Dear Committee Members,

Pacific Wild is a conservation organization dedicated to protecting wildlife and ecosystems in the Great Bear Rainforest and Pacific Northwest.

We recognize the importance of a strong Canadian economy and the benefits of an efficient, predictable process for reviewing major development projects. However, we believe that Bill C-39, the Building Canada Strong Act, would weaken environmental protections and reduce opportunities for meaningful public and Indigenous participation in decisions affecting Canada's natural heritage.

We're particularly concerned about the impact of fast-tracked development on British Columbia's coastal ecosystems, including the globally significant Great Bear Rainforest.

Defining the public interest

Bill C-39 would give ministers more discretion to allow some activities before environmental assessments are complete and to change environmental conditions based on the "public interest."

But the legislation does not define "public interest" or lay out how protecting the environment will be weighed against economic goals. That leaves Canadians underwriting a risk whose full environmental and economic costs may only become clear later.

Environment is economy

Defining public interest matters because healthy forests, rivers and marine ecosystems provide clean water and air, store carbon, support fisheries and communities, and help protect

Canadians from increasingly costly floods, fires and other climate impacts. Losing these natural benefits comes at a high cost. Protecting nature isn't an obstacle to the public interest; it's an essential part of it.

Without ecological limits, an extraction economy risks becoming a destruction economy.

Healthy ecosystems, biodiversity and climate resilience are in the public interest and must be part of how we build Canada strong.

This is especially important in British Columbia, where globally significant coastal ecosystems such as the Great Bear Rainforest support wildlife, ancient forests, wild salmon and extraordinary biodiversity that is already at risk.

Fast does not equal good

There are two old rules about construction projects. You can have them fast, good, or cheap — but you can't have all three. And successful projects start with good planning.

Bill C-39 puts extraordinary emphasis on "fast" and risks pushing complexity, cost and mistakes down the road, leaving future generations to manage harmful and potentially irreversible consequences that could have been anticipated and avoided.

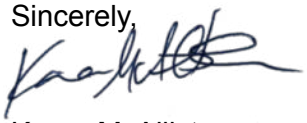
Getting it right - from the start - is how we build a stronger Canada.

With the goal of a stronger Canada in mind, we urge Parliament to:

1. Clarify the meaning of "public interest" in Bill C-39 to explicitly recognize biodiversity, ecosystem integrity, wildlife protection, and climate resilience.
2. Ensure that accelerated approvals do not permit irreversible environmental harm before assessments are complete or allow essential environmental conditions to be weakened.
3. Include enough time to assess cumulative impacts on sensitive ecosystems, with meaningful consultation and independent scientific review.
4. Allow further parliamentary scrutiny of the proposed environmental changes, including their potential consequences for British Columbia's coastal and marine ecosystems, before the legislation proceeds.

Canada must pursue economic prosperity without compromising the natural systems that sustain it. Protecting wildlife, biodiversity and healthy ecosystems is fundamental to Canada's long-term prosperity and the public interest.

Sincerely,



Karen McAllister
Executive Director
Pacific Wild Alliance