

Joint environmental organization input into Canada's National Biodiversity Strategy and Action Plan: Response to the Milestone Document

February 9, 2024

Organizations which have contributed to and endorsed these recommendations:

ALUS, Birds Canada, CPAWS, Canadian Wildlife Federation, ChariTree Foundation, David Suzuki Foundation, East Coast Environmental Law, Ecojustice, Ecology Action Centre, Nature Canada, Nature United, Nature Trust of New Brunswick, Natural Resources Defense Council (NRDC), Oceans North, SeaBlue Canada, The Wilderness Committee, West Coast Environmental Law, WCS Canada, WWF Canada, Yellowstone to Yukon Conservation Initiative (Y2Y).

Canada's opportunity and responsibility

- Given that the Kunming Montreal Global Biodiversity Framework (KMGBF) was agreed in Canada, and as a member of the [High Ambition Coalition for Nature and People](#), the G7 (which Canada will host in 2025), and other leading multilateral bodies, Canada's NBSAP – to be announced ahead of UN CBD COP16 in November 2023 – stands to set a benchmark against which the 196 signatories to the agreement will gauge their own implementation plans.
- An ambitious NBSAP that includes clear actions for implementation is essential to stem the dual climate and biodiversity crises in Canada, and can also help get the world on a positive path to halt and reverse biodiversity loss by 2030 and live in harmony with nature by 2050.

Milestone document

- We welcome the Milestone document recognition of the need for ambition, transformational change and whole of government/society approaches, including to address policy incoherence.
- We also welcome the recognition that Indigenous-led conservation is critical.
- To deliver on this promise of ambition, new and expanded actions are needed that go beyond the status quo.
- Our submission focuses on recommended cross-cutting actions to drive system change, as well as actions to deliver on specific targets.

Delivering on the promise of transformational change

- Many of the actions needed transcend individual targets and are foundational to enabling whole of government and society approaches, and effective and equitable conservation outcomes.
- At this point the Milestones Document still lacks clarity about how the Government of Canada will manage conflicting objectives, mandates and jurisdictions to better ensure alignment with the KMGBF goals and targets, within the federal government, among provincial, territorial and Indigenous governments, and within productive sectors that Canadians rely on.
- This joint submission underscores a suite of recommended cross-cutting actions to advance the systems-level change needed to deliver on the NBSAP's stated ambition and whole-of-government/society approach, supporting key pillars in the Milestone document.
- The submission also provides recommended actions for specific targets.

Cross cutting priorities that tackle multiple targets and/or drive system change

Our recommendations for cross-cutting actions* fall under the following themes:

1. Ensure Canada's NBSAP upholds and advances the UNDRIP Action Plan while delivering on ICE recommendations
2. Aligning public and private finance with KMGBF objectives
3. Improving policy coherence across government(s)
4. Mainstreaming biodiversity across key sectors
5. Enhancing accountability to deliver on KMGBF commitments

*Note many of these recommendations also appear in target-specific recommendations

1. Ensure Canada's NBSAP upholds and advances the UNDRIP Action Plan while delivering on ICE recommendations

Canada's NBSAP must uphold and advance the UNDRIP Action Plan, and deliver on the recommendations of the Indigenous Circle of Experts' landmark, [We Rise Together](#) report. To achieve this, innovative co-governance and financing arrangements are key for unlocking Indigenous Peoples' vast potential contributions to nature protection, restoration and stewardship.

Recommended actions:

1. Link **NBSAP** target actions with specific **UN Declaration Action Plan** measures.
2. Build on policy innovations and whole-of-government coordination mechanisms developed to **expedite the implementation of four Indigenous-led Project Finance for Permanence (PFP) conservation initiatives**, to streamline negotiations and approvals processes, thereby minimizing administrative burden on Indigenous governments and organizations engaged in conservation and stewardship activities.
3. Commit to models of conservation financing in which Indigenous governments, groups and entities **have the authority to assess and determine** their conservation priorities, and to raise, manage and allocate **upfront, adequate and enduring public and private resources** for both conservation and stewardship activities on their territories.

1. Ensure Canada's NBSAP upholds and advances the UNDRIP Action Plan while delivering on ICE recommendations (cont.)

Recommended actions (cont.):

4. Commit to **co-developing legislative and regulatory reforms** to remove legal barriers and align Crown laws and decision-making to recognize Indigenous laws, governance and conservation priorities, including IPCAs.
5. Make co-governance and cooperation with Indigenous peoples a **policy prerequisite** for the Government of Canada's participation in, and support for, all processes related to the planning, management, operation, monitoring and evaluation of nature conservation and stewardship.
6. Commit to regular **UNDRIP-aligned Indigenous co-governance performance reviews** on Government of Canada departments and agencies involved in the implementation of Canada NBSAP.

2. Align public and private finance with KMGBF objectives (T19)

Recommended actions:

1. Commit to a process for defining subsidies harmful to nature, developing a framework for their elimination or reform, while scaling up positive incentives.
 - By 2025, adopt definition; develop implementation framework, and identify harmful subsidies.
 - By 2030, eliminate, phase out or reform subsidies to incent positive action on biodiversity.
 - Ensure NBSAP commits to 2030 (not the current weaker language in the Milestone document of being “well into the process of...”).
2. **Nature-related Financial Disclosure (T15):**
 - Expand the Terms of Reference of the Sustainable Finance Action Council to support the Canadian financial sector to integrate nature-related financial disclosure in their operations, and to align financial flows with NBS objectives.
3. **Explore new mechanism that pays to keep nature intact (T19c)**
 - Close data gaps hindering the evolution of natural capital accounting.
 - Consider how to bring in private market investors creating value for intact nature.

3. Policy coherence/ whole-of- government(s) approach

Recommended actions:

1. **Mandate** all federal ministries/agencies to contribute to NBS goals and targets (eg. through Cabinet Directive and Accountability Act).
2. Expand the climate lens to become an **integrated climate and biodiversity lens** (see also T14):
 - Ensure the lens is designed to assess impact of policies, actions, investments on achieving NBS goals and targets, including by managing trade-offs and applying to federal budgets.
 - Expand mandate of **PCO Climate Secretariat** to include biodiversity.
 - Centre the lens on a robust **mitigation hierarchy framework**, to ensure decisions first avoid impacts, then minimize and restore, only applying offset as a last resort.
3. Coordinate/**align** the **NBS with the NDC** (under the UNFCCC) to align climate and biodiversity.
4. Recognizing the important role of provincial and territorial governments in areas of **shared jurisdiction**, encourage their cooperation and accountability by:
 - Reaffirming the federal government's **commitment to rigorous, evidence-based, public reporting** in areas such as Species at Risk, State of the Forests etc. (see also T4).
 - Convening and supporting working groups with representation from F/P/T governments, Indigenous organizations and other experts to tackle key issues (similar to Pathway working groups).

4. Mainstream biodiversity across key sectors

Recommended actions (see also T10 and T14):

1. Working with departments and agencies across the federal government, and relevant sectors, ensure that:
 - Starting immediately, new federal policies and programs relevant to key sectors are aligned with achieving KMGBF goals and targets, including the Sustainable Agriculture Strategy (AAFC) and the Adaptive and Climate-resilient Fisheries Strategy (DFO) which are currently under development.
 - By 2026, review and align sector-focused policies and programs with KMGBF goals and targets, starting with:
 - Critical Mineral Strategy (NRCan).
 - Sustainable Forestry (NRCan).
 - Infrastructure (Infrastructure Canada) eg. by requiring wildlife mitigation measures, and developing a Wildlife Crossing Infrastructure Strategy and Fund to protect wildlife and people and create jobs.
 - By 2030, complete a full review of existing sector focused federal policies and programs and align with the goals and targets of the KMGBF.
 - Ensure this alignment is consistent with UNDRIP.

5. Enhance accountability for delivering on KMGBF commitments

Recommended actions:

Table a **Biodiversity Accountability Act** with key elements explicitly outlined:

1. **Enshrine GBF goals and targets domestically**, along with rigorous standards and globally recognized indicators against which to monitor and report on progress.
2. Require Cabinet to **regularly report** to Parliament on progress on goals, targets and indicators transparently and accurately.
3. Require and outline **course-correction** measures where monitoring and reporting demonstrates not on track to meet targets.
4. Establish **independent, federally funded body of scientific experts and Indigenous knowledge holders** to support implementation of the strategy, including by reviewing and making recommendations on plans, reports and necessary course corrections.
5. Require **CESD to audit and publicly report** on progress towards GBF targets every 3 years.
6. Enshrine a **biodiversity shield** in the Act that ensures decisions made under other federal laws support and do not undermine the GBF targets and goals.

Target by target recommendations

Target 1: Plan and manage all areas to reduce biodiversity loss

Recommended actions:

1. **Define and identify/map “areas of high biodiversity importance**, including ecosystems of **high ecological integrity”** in Canada (eg. through KBA Canada and Pathway processes) as a baseline, ensuring scientific rigour, and consistency with work underway by the CBD, IUCN and other international bodies, and make this data publicly available.
2. **Define/establish a standard for “participatory, integrated biodiversity inclusive spatial planning”** that respects the rights of Indigenous Peoples.
3. **Prioritize funding for Indigenous-led or co-led spatial planning processes**, including direct funding to nations and communities to prepare and engage.
4. **Regularly assess where adequate spatial plans/processes are already in place.**
5. **Identify and prioritize high biodiversity importance areas for conservation action** (e.g., existing protected & conserved areas, KBAs, critical habitat and ecological corridors. Identify the supporting network of lands and waters around these areas that need conservation and restoration).

Target 1: Plan and manage all areas to reduce biodiversity loss (cont.)

Recommended actions (cont.):

6. Bring loss of areas of high biodiversity importance & ecological integrity close to zero by 2030.
7. Finalize **Canadian Vegetation Classification System** to support Red List Ecosystem Assessments and reporting (Headline indicator). Consider **domestic indicator that also reports on the status and trends of tracked ecosystems** in Canada using NatureServe data (similar to Wild Species reports).
8. Extent of natural systems (Headline Indicator) and land -use change (Domestic Indicator) are **not sufficient to track and report on ecosystems of high integrity**. Add ecosystem integrity and forest integrity index to indicators for this target. Ensure that global indicators are tailored to Canada (eg. accurate road layers, including resource roads etc).
9. Ensure that various federal resource management policies acknowledge the need for biodiversity-centric inclusive spatial planning to best ensure policy coherence across federal departments.

T2: Restoration

Recommended actions:

1. Restoration efforts must respect the rights holders and respect knowledge of Indigenous nations who have stewarded these lands for over a millennium.
2. Put in place Federal Government supports so Indigenous Peoples can, for example, set priorities, define culturally appropriate practices, and undertake and monitor restoration efforts.
3. Define (building on existing international work), identify and map degraded areas and priority restoration areas. Degraded areas should include mine sites, seismic lines, former industrial lands/brownfields, marginal agricultural lands, disconnected terrestrial and aquatic habitat, rail/road/energy rights of ways, well sites/drill sites, altered riparian areas.
4. Publicly track and evaluate restoration initiatives.
5. Develop both freshwater and terrestrial restoration priorities with timelines and targets, incorporating best practices from existing guidance and existing federal program priorities such as DFO's fish habitat restoration priorities.

T2: Restoration (cont.)

Recommended actions (cont.):

6. By 2025, create dedicated restoration coordinating body to ensure collaboration across government and society.
7. By 2025, implement the National Seed Strategy Framework developed under the Nature Smart Climate Solutions Fund to enable terrestrial habitat restoration at scale.
8. Allocate federal restoration science and monitoring capacity to support target setting, monitoring and reporting, and best practices for restoration.
9. Identify funding needs: review existing funding programs, including the 2 Billion Trees program, to ensure alignment with target implementation; identify and fill gaps.
10. Address regulatory barriers to restoration such as project permitting for aquatic habitats.

T3: Conserve at least 30% of land, freshwater and ocean

Recommended actions

1. Commit to **prioritize Indigenous-led or co-led conservation initiatives**, and clearly recognize the need for adequate **up-front and enduring long-term funding** that empowers Indigenous governments, groups and entities to determine conservation priorities on their territories (see cross-cutting recommendation 1). A range of funding mechanisms will likely be required to address different needs.
2. Commit to **co-developing legislative and regulatory reforms** to remove legal barriers and align Crown laws and decision-making with Indigenous conservation priorities, including IPCAs and other Indigenous-led protection and stewardship initiatives.
3. **Complete MPA network plans** across all ocean bioregions, working with Indigenous Peoples.
4. Maintain and restore **ecological connectivity** across land and seascapes:
 - Commit permanent funding for Parks Canada's **National Ecological Corridors** program.
 - Develop integrated and funded program for advancing **transboundary conservation**, including ecological networks at regional, national and international scales.
5. Re-commit to and fund establishment of **10 new national parks** (doubling the area of the existing system); **10 new NMCAs**, and **15 new National Urban Parks**, co-governed with Indigenous Peoples, by 2030.

T3: Conserve at least 30% of land, freshwater and ocean (cont.)

Recommended actions (cont.)

6. Pursue **Nature Agreements** with 5 more P/T governments and Indigenous leaders by 2025, ensuring commitments to ambitious, measurable contributions to T3 that meet standards, and prioritize Indigenous-led conservation.
7. Affirm that agreed-to international and **pan-Canadian standards** for protected areas and OECMs will be met for areas to be counted towards T3.
8. Put in place a **transparent public process** for recognizing and establishing OECMs that meet standards.
9. Commit to deliver and report on **quality, quantity and equity** elements, including by prioritizing areas of importance for biodiversity (including KBAs), and assuring that agreed-to standards of protection are met, in alignment with Indigenous rights.

T4 Species recovery

Recommended actions

1. Ensure “**improved**” rather than “**continued**” implementation of SARA.
2. Fully **identify and protect critical habitat** for all SARA listed Endangered and Threatened species by 2030. Include critical habitat identification and protection as an **indicator** for T4.
3. Identify **priority habitat for restoration or habitat threatened with destruction** for key at-risk species and work with provinces to develop shared recovery actions (also supports Target 2, 3).
4. Where the federal government does not have immediate jurisdiction, motivate provincial action through:
 - SARA **s.55** reports for Action Plans – strengthen reporting for implementation by including hectares of critical habitat protected.
 - SARA **s.63 reports** – clearly and meaningfully monitor and identify areas of critical habitat (including maps) that have or have not been protected, and why (as per CESD report).
 - SARA **s. 11 Conservation Agreements** (eg. boreal caribou)—make them **enforceable**, more rigorously and transparently monitored for compliance, and with consequences for non-compliance and lack of measurable outcomes.
 - **SARA s. 34(4) Effective protection** - undertake a review of provincial laws policies and their implementation to assess whether they provide for effective protection of endangered and threatened species.
 - **Nature Agreements**—where species at risk are included, ensure clear, measurable and ambitious commitments and actions to protect and restore SAR habitat, and strong accountability mechanisms for non-compliance.

T4 Species recovery (cont.)

Recommended actions (cont.)

5. **Ecosystem-based approaches** are needed with 1 in 5 species at some level of risk.
6. Emphasize **action** (through incentives and agreements) over planning. KBAs can help to support preemptive SAR conservation.
7. Continue operational and financial support for COSEWIC and ensure their clear recognition as an independent body with the ability to nominate members for appointment by the Minister.
8. Develop an open, spatially explicit data platform allowing public access to (non-sensitive) species at risk data (such as interactive mapping of critical habitat, species locations, data produced by consultants/contractors, data from permit reports, recovery initiatives underway, etc.) to inform planning and decision-making.

T5: Sustainable, safe and legal harvesting and trade of wild species

Recommended actions: Fisheries (also see T10)

1. **Rebuild depleted species:** Adopt and adhere to rebuilding plans for depleted species and develop a policy for conditions of reopening fisheries. Rebuilding depleted species will directly inform Canada's performance for Target 5's headline indicator.
2. **Increase support for harvesters in Indigenous communities:** Work with Indigenous communities, particularly in Inuit Nunangat, so that Indigenous knowledge can be passed to younger generations, safe handling practices are ensured, and there is an understanding of marine mammal mortality related to hunting efforts.
3. **Implement the Ecosystem Approach to Fisheries Management (EAFM) in a consistent and transparent manner across Canada's fisheries.**
 - Advance a consistent ecosystem approach across fisheries management processes.
 - Ensure that Canada's EAFM is inclusive of Indigenous Knowledge Systems, and includes measures consistent with international best practices (e.g., the use of ecosystem-based reference points, total catch indices, stock assessments informed by environmental and ecological information, valid predator prey models, and the development and implementation of regional environmental and ecological syntheses to inform EAFM priorities and decision-making).

T5: Sustainable, safe and legal harvesting and trade of wild species (cont.)

Recommended actions: Fisheries (also see T10) (cont.)

4. Ensure that all non-depleted species have stock statuses and exploitation rates that are clearly within sustainable levels.
 - The headline indicator for Target 5 is “the proportion of fish stocks within biologically sustainable levels”. To achieve Canada’s Target 5 commitments, DFO must invest substantially in stock assessments and other science advice to inform both stock status evaluations and sustainable management decisions.
5. Commit to implementing existing obligations under relevant multilateral environmental agreements related to the harvest, trade, and use of biodiversity (esp. CITES).

T6: Invasive alien species

Recommended actions:

1. Prevent new introductions by identifying key pathways of introduction, while also focusing on preventing the spread within Canada.
 2. Ensure effective and early responses to new and emerging species.
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1. Provide federal leadership to support and scale up local action, including by identifying and prioritizing action to address environmentally harmful invasive species, for example by developing a national priority list (IUCN model), helping to tie together disparate efforts.
 1. Enable and support cross-sectoral partnerships, collaboration, Indigenous leadership, and knowledge in planning, control, monitoring, and reporting.
 2. Encourage and ensure access to strong science, management, and reporting that provides accessible and transparent research and data that also helps to evaluate policies and programs to ensure effectiveness.

T7: Pollution

Recommended approach:

- Separate implementation plans and supporting indicators for the three aspects of the Target.

Key strategies for reducing overall pesticide risk:

1. Phase-out/phase-down of more hazardous active ingredients, and develop processes to support safer substitution.
2. Cancellation of, or restrictions on, categories of use, starting with “overuse” - e.g., non-pest control applications, prophylactic uses like treated seeds and cosmetic uses.
3. Transition support for farmers (programming and financial).

Recommended elements of implementation plan for overall pesticide risk reduction :

1. Health Canada review, in 2024, of hazard profile of registered pest control products to identify priorities for phase-out/phasedown (supports Strategy A).
2. Health Canada review, in 2024, of forestry pesticide use to identify best practice for reducing use (supports Strategy B).
3. By 2025, ban cosmetic pesticides (supports Strategy B).
4. By end of 2024 develop new Health Canada regulatory policy on pesticide-treated seeds, with a view to ending prophylactic use where no relevant pest threat is present (supports Strategy B).

T7: Pollution (cont.)

Recommended elements of implementation plan for overall pesticide risk reduction (cont.):

5. Review existing AAFC business risk management programs, in 2024, for alignment with GBF targets and pilot innovative financial mechanisms to de-risk pesticide use reduction strategies (supports Strategy C).
6. In collaboration with P/T partners, increase funding for Integrated Pest Management resources and extension services to support farmers transitioning to sustainable agriculture approaches (supports Strategy C).
7. Increased investment in assessing pesticide risk to species at risk and building mitigation strategies to reduce risk for SAR.

Recognizing pesticide use reduction as a pathway for reducing overall risks, establish specific **sub-targets and supporting indicators** for reducing use of:

1. More hazardous pesticides.
2. All chemical pesticides, taking into account differences in potency.

T8: Climate change and biodiversity

Recommended actions:

1. Require consideration of synergies and trade-offs between biodiversity and climate actions in the **Climate and Biodiversity lens**.
2. Ensure natural climate solutions are planned for **long-term effectiveness**.
3. Put in place a **mitigation hierarchy policy framework** across government, and ensure any offset programs are assessed within this framework to ensure they are only considered as a last resort.
4. Review and amend Canada's **carbon accounting system** to ensure it fully recognizes emissions from forestry and other sectors.
5. Review and amend climate policies and funding programs to ensure permanent **protection of high carbon ecosystems is incented** and supported, prioritizing Indigenous-led and co-led conservation initiatives.
6. Coordinate/**align the NBS with the NDC** (under the UNFCCC) to align climate and biodiversity.
7. Give explicit recognition to the outsized impacts of climate change on particular ecosystems, such as mountains and ice-related habitats.

T9: Sustainable use and management of wild species

Recommended actions:

1. With many Canadians relying on wild species for food, livelihoods and products like medicines, cosmetics and recreation, **make appropriate investments in proper monitoring** and integrate these needs with resource management.
1. Give special consideration and protection for **cultural keystone species**, especially those that do not receive protections as species at risk, e.g., salmon, caribou, plains bison, moose etc.

T10: Sustainable management in key productive sectors: fisheries

Recommended Actions - Fisheries:

1. Mainstream NBSAP targets into existing fisheries and aquatic species management processes by creating KMGBF guidance for all fisheries and aquatic ecosystem-related decisions. Take action now by:
 - Integrating Fisheries Act measures, including SFF and rebuilding plans into biodiversity plans and reporting.
 - Ensuring that the review of the Fisheries Act in June 2024 includes a biodiversity lens, and prioritize low impact fishing gear and methods in all fisheries decisions.
 - Prioritize low impact fishing gear and methods in all fisheries decisions.
2. Ensure broad based fisheries incentives are tied to improved outcomes for biodiversity:
 - Federal incentives, including funding programs for industry (i.e. Atlantic Fisheries Fund) should be tied to ecological approaches at regional and local scales and based on improved outcomes for aquatic ecosystems.
 - Engagement with and support for Indigenous and community initiatives.
3. Increase funding for freshwater responsibilities, including monitoring, habitat protection and restoration, pollution prevention and reduction and enforcement, use habitat protection provisions of the Fisheries Act (35.2, 43.3).
4. Align fisheries related international agreements (WTO, RFMO, FAO, BBNJ, ISA) and Canadian mandate and rules with GBF goals and targets.
5. Advance fisheries reconciliation and support inshore fisheries and livelihoods.
6. Address climate impacts on fish populations, including ecosystem based decision making.

T10: Sustainable management in key productive sectors: forestry

Recommended Actions - Forestry:

1. Work with P/Ts to develop a **regulatory framework** to halt forest degradation by 2030, as committed to in the Glasgow Leaders' Declaration on Forests and Land Use, that includes:
 - Thresholds for linear disturbance density consistent with recovering woodland caribou and other species at risk, and a transparent evaluation method for reporting on implementation.
 - Prioritizing the permanent protection of primary forests and old growth, and lands and waters that are culturally important to Indigenous Peoples (contributing to Target 3).
 - Ensuring forest degradation and loss are accurately reported, aligning Canada's approach with international standards such as the UN's System of Environmental-Economic Accounting - Ecosystem Accounting (SEEA EA)/Improving the State of the Forest Annual Report by integrating essential forest degradation, biodiversity loss and Indigenous rights indicators.
 - A "Biodiversity Effects Management Framework" and "nature-forward" approach for forestry.
2. Develop a process to support the development, protection and recognition of IPCAs in the managed forest (links to Targets 1 and 3).
3. Transparently and comprehensively report on GHG emissions from industrial logging, including through the balanced reporting of natural forest carbon fluxes (see also T8).

T10: Sustainable management in key productive sectors: agriculture

Recommended Actions - Agriculture:

1. Facilitate and promote the development of market-based systems/programs that value **ecological goods and services** and **provide incentives** to farmers and ranchers for retention and restoration of habitat and the adoption of activities that support biodiversity.
2. Ensure **Best Management Practices** engage and encourage full spectrum of participation, are fiscally sound, and financially attractive to large-scale farms and agri-businesses that exert a massive influence on the landscape and smaller operations alike.
3. Empower farmers and ranchers by enhancing public sector **extension services** and supporting knowledge transfer and **peer-to-peer learning**.
4. Ensure funding programs **support biodiversity outcomes** and are flexible enough to respect different community needs, local contexts, and culture.

T10: Sustainable management in key productive sectors: agriculture (cont.)

Recommended Actions - Agriculture (cont.):

5. Using a whole-of-government approach, **review and align key relevant domestic and international policy frameworks** to mainstream biodiversity values, encourage nature-positive practices, and improve on-farm resilience (see also Target 14):
 - the National Biodiversity Strategy and Action Plan and the Sustainable Agriculture Strategy.
 - the Food and Agriculture Organization of the United Nations [Global Roadmap](#).
 - World Trade Organization's Agreement on Agriculture.
6. Support the uptake and adoption of **tools and technologies** that can improve productivity, generate new income streams, education/encourage nature-positive practices, and improve on-farm climate resilience.
7. Complete **National Wetland and Grassland Inventories** to focus conservation, restoration, and monitoring programs; assist industry, governments, and conservation groups develop land-use protocols; and measure performance of policies and protocols towards landscape sustainability objectives.
8. **Identify and re-direct subsidies** for practices that are directly or indirectly harmful to biodiversity to support/incent nature-positive approaches (see also Target 18).

T14: Mainstreaming of biodiversity values

Recommended actions:

1. Expand climate lens to become an **integrated climate and biodiversity lens** and apply broadly across federal decisions, policies and budget, and expand the mandate of the PCO Climate Secretariat to include biodiversity
2. Working with departments and agencies across government, and relevant sectors, ensure that:
 - Starting immediately , all new **federal policies and programs are aligned** with achieving KMGBF goals and targets, including the Sustainable Agriculture Strategy (AAFC) and the Adaptive and Climate-resilient Fisheries Strategy (DFO) currently under development.
 - By 2026, review and **align sector-focused policies and programs** with KMGBF goals and targets, starting with:
 - i. Critical Mineral Strategy (NRCan).
 - ii. Sustainable Forestry (NRCan).
 - iii. Infrastructure (Infrastructure Canada) eg.by linking federal funding to wildlife mitigation requirements; developing Wildlife Crossing Infrastructure Strategy and Fund.
 - By 2030, complete a **full review** of existing federal policies and programs and align with the goals and targets of the KMGBF.
 - Ensure this alignment is consistent with UNDRIP.

T14: Mainstreaming of biodiversity values (cont.)

Recommended actions (cont.):

3. Apply the **mitigation hierarchy** as an overarching policy framework in a central agency, to be applicable to all federal offsets programs.
4. Ensure nature-positive sector strategies contribute to a whole-of-government initiative to **close data gaps hindering natural capital accounting and nature-related financial disclosure**, as an essential element for land use planning, regulation development, and for making the economic case for natural asset investment.
5. Enshrine a biodiversity shield in an accountability law and develop **clear policy guidance for when governments should say no** to project proposals when the harm posed to biodiversity is too great.

T15: Business role

Recommended actions:

1. Ensure sector strategies (under T10) align with and feed a whole of government initiative to close data gaps hindering the evolution of natural capital accounting and nature-related financial disclosure, as an essential element for land use planning, regulation development, and for making the economic case for natural asset investment.
2. Investigate approaches for supporting the Canadian financial sector to integrate **science-based targets** for nature and **nature-related financial disclosure** in their operations to align financial flows with the objectives of the Framework.
3. **Catalyze investments in nature-positive practices and value chains**, including through the deployment of innovative finance to mitigate risks facing investors in Canada's nature-positive future, and by creating new blended finance opportunities and streams that build on and complement precedents set through existing mechanisms such as the Canada Growth Fund, Green Bonds Program, and Canadian Innovation Corporation.

T18: Reduce harmful subsidies and scale up positive incentives

Recommended actions:

1. By 2025, **define** incentives/subsidies harmful for biodiversity, **develop implementation framework** (including for prioritizing), and **review and identify harmful subsidies** with particular focus on those whose activities are direct drivers of biodiversity loss (eg. land and sea use change, overexploitation, climate change, pollution, invasive species etc.).
2. By 2030 **eliminate, phase out or reform** harmful subsidies and **scale up positive incentives** in a just, fair effective and equitable way, to align with halting and reversing biodiversity loss.
 1. To meet the commitment that “targets will be adopted with the full ambition of the KMGBF”, the NBSAP must clearly state that this work will be completed by 2030 rather than being “well into the process of...” as the Milestone document currently says.
 1. Engage a group of **experts** to support implementation of this target.
 2. Consider impacts on biodiversity in Canada and globally.

T19: Resource mobilization

Recommended actions:

1. **Increase long-term federal financial support** to provide certainty to Indigenous Nations and communities and other partners as they consider long-term decisions about land and ocean use and conservation.
2. Immediately launch a review of **subsidies and incentives** to identify those that are harmful to biodiversity by 2024 and develop a plan to phase out or reform them by 2028 (Target 18). This work can help fill the current biodiversity funding gap.
3. Develop a **full suite of tools**, including blended finance, targeted levies, impact funds, biodiversity bonds, payments for ecosystem services and offset mechanisms, to de-risk and spur investments to help build a nature-positive economy. The Canada Growth Fund, Net Zero Accelerator Initiative and Nature Smart Climate Solutions Fund offer starting points to build on.
4. Underpin Canada's biodiversity finance plan with a **robust mitigation hierarchy policy** that aims first to avoid impacts to natural habitat, then minimizes impacts and restores habitat, then, as a last resort implements biodiversity offsets with rigorous safeguards.
5. Assist Canadian companies and markets in understanding and managing **nature-related risks** to their operations (Target 15) by expanding the terms of reference of the [Sustainable Finance Action Council](#) to support the Canadian financial sector to integrate nature-related financial disclosure in their operations and to align financial flows with the objectives of the GBF.

T21: Knowledge sharing

Recommended actions:

1. Ensure the biodiversity strategy is accompanied by **robust indicators and a commitment to regular, transparent reporting**. The suite of indicators can be built on over time.
2. Include in the 2030 strategy a **mechanism to adapt** based on reporting information (i.e., adaptive management).
3. Consider a **biennial state of nature/biodiversity'** report for a public audience to share updates of the indicators and interpret the findings. Otherwise, like CESI, it will just be an aggregation of indicators that lack 'big picture' context.
4. **Link indicators with Accountability law.**
5. Breakdown **reporting by ecoregion** (if province or territory is not possible). Subnational reporting could highlight regional successes, challenges, and important next steps.
6. Commit to establish an **integrated national inventory for biodiversity information**. This could be loosely modelled on the National Pollutant Release Inventory established under the Canadian Environment Protection Act. The goal of the Inventory would be to dramatically expand public and governmental evaluation and monitoring of trends in biodiversity, to drive science-based decision making and to support ongoing biodiversity research across the country.
7. Lead development of a pan-Canadian strategy to provide transformative, formal and informal climate and **biodiversity education**, including science-policy interface studies and lifelong learning processes, and recognizing diverse world views, values and knowledge systems of Indigenous peoples.