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Strategic Assessment
Wildlife Assessment and Information Division
Canadian Wildlife Service
Environment and Climate Change Canada
Via email to: SCFEvaluationStrategique-CWSStrategicAssessment@ec.gc.ca

Greenpeace Canada comments - Offsetting Policy for Biodiversity

To Whom It May Concern,

We are pleased to share Greenpeace Canada's comments in relation to the draft Offsetting Policy for Biodiversity. Having reviewed the proposal, we believe it flies in the face of the constructive role Canada played at the recent COP 15 in Montreal towards halting and reversing biodiversity loss. Indeed "biodiversity offsets" are a fundamentally misguided approach that will only exacerbate the biodiversity crisis we are experiencing [globally](#) and [in Canada](#). Here are 10 reasons why this is bad public policy:

1. The policy goal of "no net loss" is flawed. Instead, the policy goal should aim at ensuring that project developments do not negatively impact biodiversity under ECCC's wildlife mandate.
2. This is especially so given the Canadian government's failure to meet previous protection targets under the *Convention on Biological Diversity*. Notably, this includes a still unfilled commitment to protect 17% of terrestrial areas by 2020. Policies should be urgently focussed on increasing protection of biodiversity.
3. As we outlined in our [submission to the Strategic Assessment of Climate Change – Draft Technical Guide](#) on the use of "carbon offsets", biodiversity loss (like greenhouse gas emissions) needs to be halted, not compensated through a dubious offsetting scheme to reach "[net positive](#)". We need stronger laws, policies and other measures that prohibit the destruction of biodiversity.
4. There are lots of references to "international standards". But *Free, Prior and Informed Consent* (FPIC) for activities impacting Indigenous territories and biological diversity is not mentioned. FPIC is an [internationally recognised](#) minimum standard for the survival, dignity and well-being of Indigenous Peoples.
5. The draft policy states that offset will be used to address "residual adverse effects" and only after "all feasible measures have been applied." In practice, it is questionable how much this will be truly limited in its usage, given the interests and influence of big developers in projects. In the case of carbon offsets, the idea was also originally to only use them for strictly the most difficult to eliminate emissions after all feasible efforts had been made. But in reality, [carbon offsets soon became the go-to for big emitters](#) to greenwash their operations writ large.

6. References to “habitat banking” are of grave concern. Habitat banking [is](#) “a market where credits from... beneficial biodiversity outcomes can be purchased to offset the debit from environmental damage.” This opens up the possibility of a market-based system wherein wealthy developers or corporations simply pay a fee in order to destroy biodiversity. This has also been referred to as a *pay-to-slay* mechanism and was introduced to widespread criticism [by Doug Ford](#) in Ontario. Allowing this at the federal level would be a grave error.
7. The governance structures and accountability for restoration outlined in the policy are wholly inadequate. The restoration of biodiversity across Canada is a governmental (Indigenous, federal, provincial or municipal) function and responsibility, not something that can be outsourced to third parties, especially not those responsible for harm to biodiversity in the first place. That’s like putting a burglar in charge of a scheme to repay those he stole from.
8. Ecosystems and biodiversity can take centuries, or even millenia, to recover even in the best circumstances. If governed by a for-profit corporation, how do we ensure the kind of necessary long term implementation to ensure restoration actually occurs? And will climate change or other weather events disrupt restoration potential unexpectedly in the future? There are significant uncertainties associated with the timeframes that restoration will ever occur.
9. How will this policy affect old growth forests? It is not clear whether it could lead to situations in which an old growth forest is logged, but this logging is deemed “net positive for biodiversity” through a subsequent tree plantation. [Concerns](#) with the federal government’s decision to “offset” the climate impacts of the Trans Mountain Pipeline through a commitment to plant 2 billion trees are analogous.
10. As Friends of the Earth vividly put it, offsetting is essentially a “[license to trash](#)” for big polluters, wealthy developers and large corporations. This trash now / pay later mentality is a big part of what has gotten our society into the current crisis. Getting us out of it requires shifting our attitudes and policies away from seeing nature as a cheap commodity that can be moved around at our convenience.

In conclusion, ECCC should be focussed on delivering a strong and timely overall action plan to halt & reverse biodiversity loss in line with its international commitments - including legislation, not fast-tracking dangerous and fundamentally flawed “offsets” initiatives that would undermine efforts to stem the rapid loss of biodiversity in Canada.

Sincerely,



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