Midway to 2030: Canada must take action to close the gaps at CBD COP17

From 19 to 30 October, countries are coming together in Yerevan, Armenia, for the 17th Conference of Parties (COP) to the UN Convention on Biological Diversity (CBD). The **17th CBD COP is happening at a critical time: it marks the midway point for the implementation of the 2030 targets** of the Kunming-Montreal Global Biodiversity Framework (KM-GBF) that were agreed four years ago in Montreal. It will conclude the Convention's first official Global Review of collective progress, a critical stocktake halfway through to 2030.

Since the signing of the KM-GBF in December 2022, the federal government has undertaken several initiatives to achieve the overarching objective of halting and reversing biodiversity loss by 2030, and a nature-positive world by 2050. These include the *Nature Accountability Act* (Bill C-73, introduced in the House of Commons in June 2024 but never enacted), and *Canada's 2030 Nature Strategy: Halting and Reversing Biodiversity Loss in Canada*.

Most recently, with the launch of 'A Force of Nature' strategy, Canada is showing a clear effort to meet **Target 3** (protecting and conserving 30% of land and water by 2030) of the KM-GBF, but falls short on ensuring that the government's accountability exercise translates to true protection that guarantees ecological connectivity and that honours Indigenous rights and stewardship. The legal recognition of self-determined **Indigenous Protected and Conserved Areas (IPCAs)** as distinct systems of protected areas will be essential for Canada to achieve this goal.

As Canada has not submitted its 7th National Report yet, which Parties were requested to do by end of February 2026, **it is unclear how much progress has been made towards meeting the other 22 targets of the Framework.** Prime Minister Carney's government has not shared detailed plans nor ambitions towards meeting the other 22 targets of the GBF.

What is clear however, is that **Canada's destructive 'nation-building' agenda is deeply incompatible with its international biodiversity commitments.** The federal government's recent social and environmental rollbacks, **including with the introduction of Bill C-39 (the *Building Canada Strong Act*) will severely affect Canada's progress** on the following targets:

- **Target 1 and 14:** Plan and manage all areas to reduce biodiversity loss, and integrating biodiversity in decision-making: while the GBF requires countries to ensure that all areas are under biodiversity inclusive spatial planning, and that

biodiversity should be fully integrated at all policy levels, Bill C-5 (enacted) and most recently C-39 are deliberately excluding nature from the overall nation-building agenda.
- **Target 4**: Halting species extinction: both Bill C-5, enacted in June 2025 and Bill C-39 grant Cabinet sweeping power to bypass the *Species At Risk Act* and *Fisheries Act* for major projects meaning weaker environmental protections, including for already endangered species.
- **Target 8**: Climate change & biodiversity: listing the Pacific Link pipeline as a project of "national interest" is not compatible with international biodiversity commitments to minimise the impacts of climate change and its consequences on biodiversity.
- **Target 18**: Canada must eliminate, phase out or reform subsidies harmful for ecosystems and biodiversity and the effective implementation of the polluter pays principle in tax designs.

In addition to these compromised targets, the current federal government's strategies are still inadequate to meet several of the GBF targets, including:

- **Target 2**: Restore 30% of all degraded ecosystems: is overlooked in Canada's recent biodiversity policies, but remains an essential component to the Framework. Because Canada has not submitted their 7th National Report yet, it is unclear how much progress Canada has made regarding their commitment to bring at least 19 million hectares of degraded and deforested landscapes under restoration by 2030.
    - Restoring nature is also very important in Canada's cities where most Black, racialized, newcomer, and low-income communities and people with disabilities live. As outlined in Greenpeace Canada's *Belonging in Nature* report (January 2026), people in these communities are still facing systemic barriers in accessing and belonging in nature.
- **Target 12:** Size of, access to, and benefits from nature in urban areas: According to the 2030 Nature Strategy, urban greenness in Canada decreased by 7.8% from 2000 to 2023. Despite federal measures being mentioned in the strategy to achieve Target 12, they remain largely ignored in Carney's recent Force of Nature Action Plan. Goals related to access to nature have gone largely unaddressed by all levels of government despite extensive research demonstrating deep race, gender, ability and class-based equity gaps in accessing, enjoying and benefiting from nature.
- **Target 14:** Accountability: neither the 2030 Nature Strategy nor the Force of Nature Action Plan provide rules as to how progress towards achieving the objectives and targets are to be measured and reported.
- **Target 18**: Subsidies harmful to nature: as named above, The Force of Nature Action Plan does not make elimination of subsidies harmful to nature a priority. The federal Spring 2026 Economic Update adds two new fossil fuel

subsidies—a tax credit for enhanced oil recovery (EOR) associated with carbon capture and storage (CCS) projects, and faster capital cost write-offs for liquefied natural gas (LNG) facilities that use "low-carbon" production technology. Canada must develop a robust plan to eliminate these harmful subsidies and incentives.

- **Target 19**: Contribute to international biodiversity finance: Canada has committed $350 million in its International Biodiversity Program to support developing countries in implementing the Global Biodiversity Framework. This $350M is far less than its proportionate share of the required $200 billion. None of the $3.8 billion committed under the Force of Nature Action Plan appears to be directed to achieving Canada's Target 19 commitment.
- **Targets 22 and 23:** Equity for Indigenous Peoples and gender-responsive participation: Equity, gender equality and reducing disparities in programs, policies and laws relating to biodiversity loss is largely absent from the Force of Nature Action Plan. The recognition of IPCAs and the respect to FPIC from Indigenous Peoples (already threatened by Bill C-5 and C-39) are essential in achieving these targets. The 2030 Nature Strategy has undergone a Gender-Based Plus analysis "to understand the unique potential impacts of [its] policies and programs on different groups." However, it is unclear to which extent this gendered-responsive planning was applied into the Force of Nature Action Plan (the words "equity" and "gender" are not even included in the strategy). A robust, detailed and accountable integration of gender equity, reduction of disparities, tackling of environmental racism and advancement of environmental justice (as hinted in *Canada's Draft National Strategy Respecting Environmental Racism and Environmental Justice 2026-2031*) must be applied to Canada's nature protection policies.

To close the gaps, Greenpeace Canada asks the following from Canada at COP17:

- **Support the proposal to formally recognise Indigenous and Traditional Territories (ITTs) as distinct systems of protected and conserved areas,** and to legally secure community-led initiatives for protected areas and OECMs (Other Effective Area-based Conservation Measures).
- **Commit to recognize self-declared Indigenous Protected and Conserved Areas (IPCAs) as distinct, Indigenous-led and governed systems of protected areas in Canada.** This would help Canada to achieve the rights-based implementation of Target 3. The Canadian government must recognize Indigenous territorial and governance rights, mandate FPIC (Free, Prior, and Informed Consent) and meaningful participation, protect environmental human rights defenders, and ensure Direct Access Finance (DAF) mechanisms that strengthen self-determination and long-term stewardship.
- **Support equitable, predictable and rights-based direct access to finance mechanisms** for Indigenous Peoples and local communities, through existing

and future biodiversity finance mechanisms, including the GBFF, the Cali Fund, the TFFF and other international funding structures. Financial support for community-led urban initiatives is also essential to advance Target 12, particularly for racialised, low-income communities and people with disabilities who are systemically excluded from nature in many urban settings, starting in Canada.

- **Ensure adequate biodiversity financing:** the mobilisation of $20 billion USD per year by expanding national fiscal space to mobilise more resources, through the full alignment of national and international fiscal policies and regulations with the goals and targets of the KM-GBF, and through the introduction of progressive environmental taxation. This includes eliminating, phasing out or reform subsidies harmful for ecosystems and biodiversity and the effective implementation of the polluter pays principle in tax designs.
- **Maximise climate and biodiversity synergies**: As a triple COP year, 2026 presents a unique opportunity for progress across the three conventions and to make vital contributions to well-aligned implementation at national, regional and international levels. Rio synergies shouldn't only be a political priority, but also a call to action to strengthen, align and streamline negotiating tracks and spaces for exchange. At COP17, Canada should support a robust decision that mandates the protection of ecosystem integrity and human-rights based approaches as core concepts.

Across forests, oceans and other ecosystems, Indigenous Peoples and local communities are already protecting biodiversity through customary governance systems, traditional knowledge and community-led conservation practices. Rights-based protection and restoration led by Indigenous Peoples and local communities must become central to the implementation of the KM-GBF. COP17 represents a major opportunity to advance rights-based conservation globally and nationally. Canada must abandon its nature-destructive agenda and double down on stronger nature protections, honour Indigenous rights and stewardship, and advance environmental justice to ensure nature in Canada is protected, restored and accessible for all.

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