May 14, 2026

The Honourable Julie Dabrusin, P.C., M.P.
Minister of Environment, Climate Change and Nature
125 Zaida Eddy Private
Ottawa, Ontario, K1R 0E3

(*submitted via email to SDO-BDD@ec.gc.ca*)

Dear Minister Dabrusin,

Thank you for providing the opportunity to comment on the Ministry of Environment and Climate Change Canada's (ECCC) draft *2026-2029 Federal Sustainable Development Strategy* (FSDS).

The Business Council of Alberta (BCA) is Alberta's leading business coalition, representing CEOs from across the province's diverse industries. We offer pragmatic, non-partisan solutions to improve Canada's investment climate and prosperity. Our members represent the majority of Alberta's private sector investment, job creation, exports, and research and development.

Canada is at a critical juncture. Now more than ever, the Government of Canada needs to consider "sustainability" and "development" solely through the lens of building a strong, resilient, and competitive economy.

The Prime Minister has correctly identified economic growth and business investment as core priorities for the country. But that investment will only materialize if Canada's policy environment gives businesses the confidence and certainty they need to compete and win globally.

A meaningful plan for economic growth needs to lean into Canada's high-value comparative advantages — namely, ensuring we can sell our valuable goods and natural resources to the nations that desperately need what we can provide including food, energy, fertilizer, and more. Without doing so, Canada will not achieve $1 trillion in investment by 2030, a flagship ambition of the Prime Minister and envisioned in Budget 2025.

Accordingly, Canada cannot afford for the federal government's strategic direction to deviate from a real plan for economic growth.

Broadly speaking, BCA shares this government's belief that any such plan should align with the Prime Minister's priority areas as outlined in his mandate letter. However, as currently drafted, the economic growth components of the FSDS do not advance our shared goal of attracting investment and creating a competitive policy environment, for the following reasons:

1) The FSDS will not unlock meaningful business investment in Canada's highest-value sectors:

Natural resource security is more top-of-mind to international markets than it has been since the 1970's energy crisis. Potential global buyers of our vast resources have a renewed appreciation for

Canada as a stable, reliable supplier, particularly since Canadian resources do not need to transit the Strait of Hormuz, the Malacca Strait, or the Taiwan Strait.

But for too long we have been regulating investment away from Canada, erecting self-imposed roadblocks to the capital deployment needed to get our resources to world markets. In the absence of our own Hormuz-like chokepoint, we are actively choosing to impose one on ourselves.

As the Prime Minister outlined in his Davos speech, Canada is “engaging broadly, strategically, with open eyes,” and “actively tak[ing] on the world as it is, not wait[ing] for a world we wish to be.” While we agree with this sentiment, the “world as it is” is one that wants to buy our oil, natural gas, ammonia, coal, wheat, canola, beef, petrochemicals, potash, uranium, and critical minerals. This is precisely why they are our highest value opportunities for growth. A real growth agenda requires Canada to supply more of these products.

But rather than aligning with government’s broader economic strategies that do focus on high-value opportunities rooted in the “world as it is,” the FSDS is heavily built on outdated assumptions and weighted toward encouraging activities that are more aligned with “a world we wish to be.”

To be clear, BCA understands that a sustainable development strategy may not focus on the same components of the federal government’s broader economic strategy, of which high-value natural resource development plays a substantive part.

However, at the very least, the FSDS should avoid being at odds with the government’s growth agenda in these sectors. For example, the FSDS includes several references to greenhouse gas emissions targets and climate plans that rely upon outdated assumptions about global demand for Canada’s highest value resources. These plans and assumptions, which also guided policy development, clearly no longer mesh with “the world as it is” and all the opportunities this world creates for Canada.

2) The FSDS does not reflect a public service in alignment with cabinet’s ambitious growth agenda:

The Prime Minister has established an ambitious growth agenda. Among its goals, Canada is hoping to become an energy superpower, diversify our export markets, and enable $1 trillion in investment by 2030. To do so, the federal government needs more than just a plan that is aligned with Canada’s highest-value economic growth opportunities. It also needs a public service that’s in total alignment with cabinet’s economic goals.

Right now, that’s not the case.

BCA’s experience is that departmental leadership broadly understands the shift in this government’s agenda, tone, and its desired pace of change; but this shift is not always percolating throughout the broader public service, who is typically tasked with drafting documents such as the FSDS.

For example, the cabinet's Canada-Alberta Memorandum of Understanding is not mentioned despite its key role in determining the trajectory of future climate policy; and the 'competitiveness' themes brought forward in this government's Climate Competitiveness Strategy are not a priority of the FSDS despite one brief mention.

Furthermore, sustainability concerns cannot be confined to within our domestic borders. One of the best ways Canada can contribute to global climate change mitigation while growing our economy is through exporting our low-carbon liquefied natural gas (LNG) to the world. This government demonstrated it considers LNG a part of Canada's climate and economic strategies when it referred LNG Canada Phase 2 to the Major Projects Office. Despite this referral, and the growing economic opportunities to bolster Canadian LNG exports through other proposed projects, LNG plays no part in the FSDS.

Without whole-of-government alignment with the economic growth priorities of this Prime Minister and cabinet, the misalignment of the public service will thwart those goals or at least delay the pace of achieving them.

3) The FSDS does not develop the step-by-step actions necessary to move from target-setting to real action:

Bullets (1) and (2) above lay out why we think the FSDS will not attract game-changing business investment to Canada. As such, the direction of the plan is insufficient and misaligned with the Prime Minister's and cabinet's goals.

Even if the strategic direction of the plan did create an investment-friendly policy environment, the tactical components of the existing FSDS lack the short-term, step-by-step actions necessary to answer the "how" question regarding executing such a strategy.

In far too many of the FSDS's goals, the listed targets do not provide a clear roadmap outlining the steps that government will take to achieve them.

There are many examples from the FSDS that illustrate this problem. For instance, Target 2.1.1, which aims to improve Canada's labour productivity growth to exceed the G7 average, proposes the following "implementation strategies" to meet the target:

- "Attract foreign investment, technology, talent, and expertise, and support domestic businesses in scaling production and expanding internationally to foster growth and innovation."
- "Invest in transportation, economic, and communication infrastructure to enhance accessibility and the efficient, sustainable movement of goods, people, information, and ideas."
- "Strengthen Canada's research ecosystem, promote research dissemination, and encourage businesses to invest in research, development, and demonstrations to boost innovation and lay the groundwork for future productivity growth."

While all laudable goals, they are not a clear policy roadmap to achieving the stated target.

How does the government plan to, “attract foreign investment”? *How* does the government plan to, “invest in transportation, economic, and communication infrastructure” such that it will improve productivity, and in what infrastructure projects, specifically? *How* will the government, “encourage businesses to invest in research, development, and demonstrations”?

These important strategic-level goals lack the specificity that will bring about meaningful and implementable change within federal systems.

To be clear, BCA wants to see an altogether different strategic direction adopted by the FSDS. But even if a new, better strategy was adopted, if it were structured the same way as the current FSDS, it would lack the tactical components necessary to move beyond strategy to measurable action.

Conclusion:

With the right plan in place, Alberta businesses stand ready to invest the capital needed to build a stronger, more prosperous, competitive, and resilient Canada. What Canada lacks today is a tangible public policy framework that aligns private sector incentives with the investments needed to build this future.

The federal government needs to be focused on policy reforms that will actually attract the investment it says it wants. The economic growth components of the FSDS will not get Canada where we collectively need to be.

In contrast, BCA has developed a real plan for growth. On 30 March, BCA released *From Barriers to Breakthroughs*, a comprehensive, actionable plan to unlock the scale of private sector investment this government is looking to achieve.

BCA wishes to thank ECCC for the opportunity to submit comments during this consultation phase. We have already been in close contact with key department heads and ministerial office staff to brief the government on our *From Barriers to Breakthroughs* project findings. We would be happy to discuss that project, as well as this submission, with you at a time of your convenience.

Sincerely,

Adam Legge
President

cc: Hon. Tim Hodgson, P.C., M.P., Minister of Energy and Natural Resources

Hon. Dominic LeBlanc, P.C., M.P., Minister responsible for Canada-US Trade, Intergovernmental Affairs and One Canadian Economy
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