DELIVERED VIA EMAIL: Nature2030@ec.gc.ca

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Environment and Climate Change Canada
Fontaine Building 12th Floor
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Gatineau QC K1A 0H3

Re: Canada's 2030 National Biodiversity Strategy

Thank you for the opportunity to comment on the Discussion Paper, "Toward a 2030 Biodiversity Strategy for Canada: Halting and reversing nature loss".[1] We support the development of a national biodiversity strategy for Canada and make recommendations below to ensure the strategy accounts for the important intersection between human, animal and environmental well-being.

A. About AEL Advocacy

Animal Environmental Legal Advocacy ("AEL Advocacy") is a public interest law practice and not-for-profit organization based in Ontario. As Canada's first intersectional animal and environmental law organization, we understand the important interconnection between humans, animals, and the environment. We combine our in-depth knowledge of the legal and political landscape with a commitment to supporting individuals and organizations working to protect animals and the environments where they live.

B. It is Vital to Incorporate Animal Welfare into our National Biodiversity Strategy

To help inform the 2030 Strategy, the Discussion Paper asks the following overarching question: "What are the key features of a successful 2030 Biodiversity Strategy?" AEL Advocacy submits that it is vital to prioritize and incorporate animal health and welfare considerations into our nation's efforts to protect and sustain our rich biodiversity.

The importance of animals in maintaining ecosystem health and overall well-being cannot be overstated. The intricate food webs, ecosystems, and biogeochemical

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[1] https://www.canada.ca/en/services/environment/wildlife-plants-species/biodiversity/2030-biodiversity-strategy-canada.html

cycles that support life on our planet heavily rely on the well-being of animals.[2] Their health, relationships, needs, behaviors, interactions, resilience, and adaptations are all crucial components of animal welfare that directly impact the functioning and balance of ecosystems.[3]

The adoption of the Animal Welfare - Environment - Sustainable Development Nexus Resolution by the United Nations Environment Assembly in 2022 serves as a significant recognition of the important link between animal welfare and environmental challenges.[4] The resolution acknowledges that animal welfare not only plays a role in addressing these challenges but also contributes to promoting the "One Health" approach. The "One Health" concept emphasizes the interdependence of human, animal, and plant health, all of which are intricately tied to the well-being of the ecosystems they inhabit.[5] A related concept known as "One Welfare" builds on the "One Health" approach and is another way to recognize the many social interconnections between human welfare, animal welfare and the integrity of the environment.[6]

AEL Advocacy strongly urges the government to embrace a holistic "One Health, One Welfare" perspective that incorporates animal welfare into Canada's national biodiversity strategy. To that end, we make the following recommendations:

a. **Enhance collaboration and coordination:** The 2030 Strategy should foster partnerships between relevant governmental departments, Indigenous communities, animal and environmental protection organizations, and public health agencies to ensure a comprehensive approach to biodiversity conservation that accounts for animal health and welfare.

b. **Uphold wild animal welfare:** The exploitation of wild animals and their natural habitats is the second main driver of global biodiversity loss. According to a recent report by the World Federation for Animals, "these effects can be avoided, or at least reduced, by protecting wild

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[2] https://wfa.org/wp-content/uploads/2023/03/Unveiling-the-Nexus-The-Interdependence-of-Animal-Welfare-Environment-Sustainable-Development.pdf
[3] *Ibid.*
[4] https://wedocs.unep.org/bitstream/handle/20.500.11822/39731/K2200707%20-%20UNEP-EA.5-Res.1%20-%20ADVANCE.pdf?sequence=1&isAllowed=y
[5] *Ibid*; See also: https://www.woah.org/en/what-we-do/global-initiatives/one-health/
[6] https://animalhealthcanada.ca/work-areas/one-welfare

animals from the harmful effects of exploitation, trade and the destruction of their habitats."[7]

The report suggests that implementing welfare guidelines for wildlife trade and use can yield substantial benefits. These guidelines can lead to lower mortality rates among wild animals, reduce the capture of wildlife, prevent the emergence of zoonotic diseases, and curtail illegal trade activities.[8] The 2030 Strategy should prioritize the establishment of enforceable welfare guidelines for wildlife trade and use.

AEL Advocacy further recommends that the 2030 Strategy place strong emphasis on a "One Health, One Welfare" approach to combatting the wildlife trade in Canada. This approach involves implementing stronger laws and regulations to reduce wild animal trade, exotic pet ownership, and roadside zoos. A regulatory framework, such as a positive list, for example, should be adopted to control the wildlife and exotic pet trades, based on considerations including animal welfare, public health and safety, environmental and biodiversity protection, and species-specific expertise.[9]

Additionally, emphasis should be placed on rewilding efforts, which involve restoring ecosystems and reintroducing native species. By shifting away from harmful wildlife exploitation practices and prioritizing rewilding, we can contribute to the protection and recovery of diverse and thriving ecosystems in Canada.

c. **Increase public awareness and education:** The 2030 Strategy should include a plan to implement awareness campaigns to educate the public about the importance of animal health and welfare for the well-being of ecosystems and human society.

d. **Allocate resources for research and monitoring:** AEL Advocacy recommends the 2030 Strategy prioritize investment in scientific

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[7] *Supra* note 1.
[8] *Ibid.*
[9] https://dkt6rvnu67rqj.cloudfront.net/cdn/ff/Z18viEr7AZ5Q6Q8J8GPOqScfMCWTKKyu1J8kubue_YI/1614269031/public/media/wildlife_trade_in_canada_report_english_digital_march_2021.pdf

research and monitoring programs to better understand the interconnections between animal health, ecosystem health, and human health. This will enable evidence-based decision-making and the development of effective strategies to address emerging challenges.

e. **Focus on food system transformation:** Our global food system is recognized as the primary driver of biodiversity loss, and it is crucial to address its environmental consequences.[10] Intensive farming practices, such as factory farming, have significant negative impacts on the environment, including air and water pollution, deforestation, and greenhouse gas emissions, all of which contribute to climate change, biodiversity loss, and ecosystem degradation.[11]

In light of these challenges, we recommend focusing on food system change that has two key components. First, it should prioritize the adoption of high-welfare animal agriculture practices. By ensuring better conditions for animals and promoting their well-being, we can mitigate some of the negative impacts associated with industrial farming.[12]

A recent report by the World Federation for Animals further supports this approach, highlighting that agricultural and fisheries systems characterized by higher animal welfare, such as well-run agroecological and integrated systems, address key drivers of the triple planetary crises (pollution, climate change, and biodiversity loss).[13] These systems have lower greenhouse gas emissions, higher carbon sequestration potential compared to industrial animal farming, and greater resilience to climate change and disasters, thereby supporting mitigation and adaptation efforts.[14] Moreover, they are more biodiversity-rich and provide essential ecosystem services such as pollination and

[10] https://www.chathamhouse.org/sites/default/files/2021-02/2021-02-03-food-system-biodiversity-loss-benton-et-al_0.pdf
[11] https://www.aeladvocacy.ca/_files/ugd/c883e8_a881e24cba2a444b8a2f2ccedd78a03f.pdf
[12] *Ibid* at page 68.
[13] *Ibid*.
[14] *Ibid*.

temperature regulation.[15] Lastly, these systems are less polluting, making them a more sustainable and responsible choice.[16]

Second, it should place emphasis on shifting away from animal-based foods towards plant-based alternatives. A recent report supported by the UN Environment Programme and Compassion in World Farming highlights the need for global dietary patterns to shift towards more plant-heavy diets due to the disproportionate impact of animal agriculture on biodiversity, land use, and the environment.[17]

To this end, there is a pressing need to invest in plant-based protein alternatives and emerging technologies like cellular meat. These innovations offer promising solutions to reduce the environmental impact of our food system while providing alternative protein sources.

By focusing on food system transformation that prioritizes high-welfare animal agriculture and a shift towards plant-based foods, we can make significant strides in mitigating the negative impacts of the food system on biodiversity loss and ecosystem health. This approach aligns with scientific evidence and provides an opportunity to create a more sustainable and resilient food system that supports both human well-being and the conservation of biodiversity.

In alignment with Target 16 of the Kunming-Montreal Global Biodiversity Framework, it is imperative for the government to prioritize the promotion of sustainable consumption choices and enable individuals to make informed decisions about the food they eat. This can be achieved through the establishment of supportive policy, legislative, or regulatory frameworks that prioritize the transition to sustainable and plant-based options. Additionally, a key aspect of this effort should involve enhancing education and increasing access to reliable information regarding the impact of animal agriculture on biodiversity loss and the broader environment. By equipping people with the knowledge they need, we can empower them to make

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[15] *Ibid.*
[16] *Ibid.*
[17] https://www.unep.org/news-and-stories/press-release/our-global-food-system-primary-driver-biodiversity-loss

environmentally conscious choices and embrace more sustainable dietary practices. Through a combination of education, laws, and policies, we can foster a culture of sustainability and encourage a widespread transition towards more plant-based alternatives.

By integrating animal health and welfare considerations into Canada's 2030 National Biodiversity Strategy, we can create a more sustainable and inclusive future for both humans and animals. This approach aligns with the principles of compassion, ecological balance, and long-term prosperity for our nation.

C. Conclusion

We appreciate your time and consideration in reviewing our recommendations. AEL Advocacy welcomes the opportunity to discuss these submissions further. Please do not hesitate to contact us at krystal@aeladvocacy.ca to arrange a meeting or to address any inquiries you may have.

Sincerely,

AEL Advocacy

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