

July 10, 2025

The Honourable Joanne Thompson, P.C., M.P.
Minister of Fisheries
House of Commons
Ottawa, ON K1A 0A6

Dear Minister Thompson,

Multi-Association Mandate Letter on Implementation of the *Fisheries Act* and Red Tape Review

On behalf of the undersigned industry associations and the diverse sectors, businesses, and workers we represent across Canada, congratulations on your appointment as Minister of Fisheries. We look forward to working with you and your officials to ensure effective, science-based protection of fish and fish habitat while also supporting economic development and clean growth.

Your department is integral to delivering on Prime Minister Carney's [mandate letter](#) to Cabinet, which outlines core government priorities, including building a strong economy, driving nation-building infrastructure, reducing costs, and advancing clean growth and reconciliation. However, the current state of implementation under the *Fisheries Act* risks holding back progress on these goals.

In this context, we are writing to highlight shared concerns across multiple sectors regarding implementation of the Fish and Fish Habitat Protection provisions of the *Fisheries Act*, particularly following the 2019 amendments to the Act. The changes were intended to modernize fish habitat protection and streamline compliance for low-risk projects and received broad support at the time. Since then, the lack of follow-through on key implementation tools has resulted in growing delays, administrative burden, and regulatory uncertainty for routine, low-risk activities (e.g., culvert replacements) across Canada. Despite multiple waves of consultation initiated in 2020, critical deliverables such as the Prescribed Works and Waters Regulations (PWWR) remain unrealized, creating backlogs and inefficiencies.

Our associations have engaged consistently with Fisheries and Oceans Canada (DFO) over the past several years to raise these concerns and offer constructive solutions. Unfortunately, progress to date has been slow. To help address these persistent issues while supporting your department's mandate to protect aquatic ecosystems, improve regulatory efficiency, and reduce red tape, we offer the following recommendations, which align directly with the government's stated priorities. A consistent theme across our recommendations is the need for a risk-based approach to implementation – one that ensures regulatory effort is proportionate to risk, avoids duplication across jurisdictions, and supports flexibility in recognizing provincial and Indigenous-led fisheries initiatives and co-management. These actions also align closely with the Treasury Board of Canada Secretariat's recently launched Red Tape Review, which seeks to reduce unnecessary regulatory burden associated with regulatory authorizations and project approvals.

- 1) Accelerate the Development of Compliance Tools:** A significant portion of works currently requiring site-specific review are routine, low-risk activities with well-established and effective mitigation measures. Many are essential to the continued operation of existing facilities. DFO must prioritize the timely development of practical compliance tools for these works, including new and updated Codes of Practice and the long-delayed PWWR. Advancing these tools will allow departmental and proponent resources to be redirected toward complex, higher-risk projects that merit greater oversight. Progress on implementation of these tools should be tracked and reported annually to Parliament to ensure accountability.

Liberal government priorities: permitting efficiency; clean growth; driving and monitoring progress; resource efficiency.

- 2) Deliver a Clear Implementation Plan for the PWWR:** We urge DFO to publish a clear and time-bound implementation plan for the PWWR, including concrete milestones, deliverables, and stakeholder engagement timelines.

Liberal government priorities: results-focus; driving and monitoring progress.

- 3) Drive Regulatory Efficiency, Culture Change, and Risk-Based Implementation:** A shift in departmental culture is urgently needed to align with the Cabinet Directive on Regulatory Efficiency for Clean Growth Projects. This includes adopting a results-based mindset, establishing clear service standards, and streamlining review processes. Regulatory efficiency must also be grounded in a risk-based approach – ensuring that oversight is proportionate to potential impacts, and that DFO recognizes the role of existing provincial and Indigenous-led fisheries initiatives and priorities, including co-management through Indigenous Governing Bodies. Improved coordination across departments and levels of government (i.e., provinces and territories) will further reduce duplication and complexity.

Liberal government priorities: decisive action; true partnership with provinces, territories, and Indigenous Peoples.

- 4) Strengthen Interdepartmental and Indigenous Consultation Coordination:** Improved transparency and consultation coordination are needed between DFO and other regulators such as Transport Canada, Environment and Climate Change Canada (ECCC), and the Canadian Nuclear Safety Commission (CNSC). Proponents continue to face duplicative or inconsistent requirements, while affected Indigenous communities experience consultation fatigue. Clearer protocols for interdepartmental reviews and early, coordinated engagement with Indigenous communities are essential to reducing uncertainty for proponents and supporting Indigenous participation in decision-making. Moving toward a more integrated federal consultation process – one that reflects the principle of “one project, one review” – is critical to improving efficiency and building trust.

Liberal government priorities: One Canadian economy; reconciliation; collaboration and coordination.

5) Apply Lessons from the *Building Canada Act* Across the Federal Regulatory System: The recent passage of Bill C-5 (*Building Canada Act*) reflects a growing recognition that efficient, targeted regulatory approaches can reduce timelines and deliver better outcomes without compromising environmental protection or Indigenous consultation. While the current tools are limited to projects deemed in the national interest, the underlying principles should be extended across the federal regulatory and permitting system. We encourage DFO to apply learnings from Bill C-5 and the Major Federal Projects Office to all projects subject to the *Fisheries Act*, in alignment with the government's broader commitment to reducing duplication, accelerating clean growth, and delivering results.

Liberal government priorities: focus, determination, and fundamentally different approaches to governing.

The need for regulatory clarity and timely permitting is more urgent than ever as Canada moves to build critical infrastructure, reduce emissions, and advance reconciliation. These recommendations are not new – they build on years of dialogue with your department and reflect practical, risk-based steps that will help DFO deliver on the Liberal government's broader mandate.

Thank you for your leadership and commitment to building a modern, responsive regulatory system that protects fish habitat while enabling sustainable growth. We would welcome the opportunity to meet with you or your officials to discuss these recommendations and identify opportunities for collaboration.

Yours sincerely,



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Derek Nighbor
President and CEO
Forest Products Association of Canada



Francis Bradley
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Brian Torrie
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Tyler Fulton
President
Canadian Cattle Association



Andrew de Vries
Chief Executive Officer
Canadian Forest Owners



Jason Krips
President and CEO
Alberta Forest Products
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cc: Cabinet Committee on Priorities, Planning, and Strategy

The Prime Minister (Chair)

The Hon. Steven MacKinnon (Vice-Chair)

The Hon. Dominic LeBlanc

The Hon. Shafqat Ali

The Hon. Mélanie Joly

The Hon. François-Philippe Champagne

The Hon. Tim Hodgson

The Hon. Anita Anand

The Hon. David J. McGuinty

The Hon. Sean Fraser

The Hon. Steven Guilbeault

The Hon. Gregor Robertson