

## **SYNTHESIS REPORT: PUBLIC CONSULTATIONS DRAFT SUSTAINABLE DEVELOPMENT STRATEGY**

### **GENERAL OVERVIEW**

On July 12, 2010, the 120-day consultation period, as required by subsection 9(3) of the *Federal Sustainable Development Act* (FSDA), closed. The draft Federal Sustainable Development Strategy (FSDS) was released for public consultation from March 15 to July 12, and comments were received from a number of key sources such as the House and Senate Parliamentary Committees, the Sustainable Development Advisory Council, and the Commissioner of the Environment and Sustainable Development, according to provisions in the FSDA.

As well, at the closure of the 120-day consultation period on July 12, 2010, through its inbox email, Environment Canada received a total of 91 submissions from the general public, industry, professional associations and environmental non-governmental organizations (ENGOS).

Respondents were very supportive of the whole-of-government approach. In a letter to the Minister of the Environment, the Commissioner of the Environment and Sustainable Development noted:

*“An overarching strategy is welcome both to help set Canada on a sustainable development pathway and to ensure policy coherence.”* (Commissioner of the Environment and Sustainable Development Comments on the FSDS, 2010)

Respondents were also supportive of the linking of sustainable development into the government's planning and reporting processes, the focus on the transparency of decision-making outcomes rather than the process, the use of environmental indicators to measure progress in the FSDS, and the decision to use SMART (Specific, Measurable, Achievable, Relevant and Time-bound) criteria for the targets in the FSDS.

On the quality of goals, targets and implementation strategies, many respondents suggested the targets may not be aggressive enough to meet current environmental challenges. Also noted was the fact that many of the targets and implementation strategies do not meet the SMART criteria outlined in the FSDS.

On improving transparency and accountability of decision-making, respondents were supportive of making environmental decision-making more transparent through the FSDS, but wanted further details on how transparency and accountability would be strengthened.

A number of respondents also commented on the need to collaborate with provincial, territorial and First Nations governments to achieve the goals and targets of the FSDS, to engage more frequently with civil society, and to formulate an overall vision for sustainable development.

## **SPECIFIC FINDINGS**

Comments and recommendations are grouped into five themes:

1. the approach to the FSDS;
2. the scope of the FSDS;
3. goals, targets and implementation strategies;
4. transparency and accountability; and
5. other concerns.

Comments and recommendations have been carefully reviewed and taken into consideration in the preparation of the final FSDS.

## **APPROACH TO THE FEDERAL SUSTAINABLE DEVELOPMENT STRATEGY**

Many respondents were supportive of the Government of Canada for adopting a whole-of-government approach to sustainable development with common federal goals that would replace the previous system for sustainable development. The approach to linking the FSDS to the government-wide Expenditure Management System for planning and reporting was also well received.

Respondents were also supportive of the commitment to transparency and accountability of environmental decision-making, particularly with a focus on the transparency of environmental outcomes rather than the decision-making process.

The commitment to use environmental indicators for measuring, monitoring and reporting progress on the FSDS was well-received, as well as the commitment to benchmark and use the SMART (Specific, Measurable, Achievable, Relevant and Time-bound) criteria to set targets.

## **SCOPE OF THE FSDS**

Respondents made suggestions regarding the scope of the FSDS in two main areas:

- the focus on environmental sustainability; and
- the number of federal departments specifically referenced in the draft FSDS.

Although the purpose of the Act is to improve the transparency of environmental decision-making, many respondents suggested that the FSDS should reflect the three pillars of sustainable development (environment, economy and society) and draw links between them. Examples were cited where goal areas could include economic and social dimensions of sustainable development, such as linking sustainable water use planning to its importance for economic growth—some respondents went further in suggesting that this could inform an overall vision for a future sustainable Canada.

Respondents also noted that a limited number of federal departments were specifically referenced in the draft FSDS. Respondents wanted further details on how departments, particularly the central agencies, would contribute to the FSDS, and suggested targets be assigned to specific minister(s) and department(s).

### **QUALITY OF FSDS GOALS, TARGETS AND IMPLEMENTATION STRATEGIES**

In the view of many respondents, several of the targets did not meet the SMART criteria outlined in the FSDS. In particular, respondents noted that some of the targets were not time-bound. Some respondents were concerned that targets were not aggressive enough to meet current environmental challenges.

Respondents also had many comments on the specific goals, targets and implementation strategies for each of the four theme areas (Addressing Climate Change and Air Quality, Maintaining Water Quality and Availability, Protecting Nature, and Shrinking the Environmental Footprint – Beginning with Government). A summary is presented below.

#### **On Addressing Climate Change and Air Quality**

There were diverse opinions expressed regarding Canada's approach to climate change. Some respondents were in favour of alignment with the United States and others were opposed.

Some expressed concern that the target to reduce greenhouse gas emissions was not aggressive enough to meet the challenges posed by climate change, and that the draft FSDS did not have a sense of urgency in prioritizing the issues appropriate to their assessment of the threat it poses to Canadians. Others, however, noted that the climate change goal should be re-cast by focusing on reducing global greenhouse gas emissions and contributing to international efforts on climate change.

Respondents also expressed concern about whether there was a sufficient monitoring system in place capable of tracking actual greenhouse gas emissions reductions relative to each of the policy measures found in the government's climate change plans.

Many noted that the targets for air quality need to be better defined. For both climate change and clean air, many respondents suggested a variety of additional or alternative targets and programming.

### **On Maintaining Water Quality and Availability**

Respondents expressed the view that some of the targets were not aggressive enough to reflect the importance of improving drinking water quality for all Canadians, particularly First Nations. There were many suggestions for revising the wording of the target to reflect the importance of improving drinking water quality in First Nations communities.

Some respondents suggested that the management of individual drainage basins in Canada be included in the implementation strategies under the water quality and availability targets. They cited international examples and practices regarding water management by drainage basins, which they suggested should be added to the FSDS.

Many respondents suggested additional programming for improving water quality and availability in different regions of Canada.

### **On Protecting Nature**

Respondents noted that protecting nature needs to include aquatic ecosystems as well as terrestrial ecosystems, and that implementation strategies need to draw upon the linkages between the conservation of suitable habitat and the maintenance of species populations.

Some respondents requested more details on specific targets in the FSDS, such as which areas would be protected and which areas were priorities. Numerous respondents also suggested a variety of areas in ecosystem management that were viewed as missing from the FSDS, such as sustainable forestry, plans for wetland protection, terrestrial species and curbing urban sprawl.

### **On Shrinking the Environmental Footprint – Beginning with Government**

Respondents were supportive of the inclusion of this goal, but many wanted details on how progress on the targets would be measured, monitored and reported, particularly for reducing the Government of Canada's greenhouse gas emissions. Some also suggested additional implementation strategies for consideration, such as the deployment of new technology, involving government employees and land-use planning.

## **IMPROVING TRANSPARENCY AND ACCOUNTABILITY OF ENVIRONMENTAL DECISION-MAKING**

While Canadians responded favourably to the commitment to improve transparency and accountability around environmental decision-making, there were also requests for further details of how this would take place and how transparency and accountability would be defined.

Some respondents expressed a desire for the transparency and accountability of environmental decision-making to focus on outcomes, not processes. Some respondents wanted details on how sustainable development principles referenced in the Act (such as the ecologically efficient use of natural, social, and economic resources, and the precautionary principle) would be put into practice.

Many respondents mentioned the importance of integrated decision-making in sustainable development, and wanted further details on how this would be put into practice through the FSDS. In particular, some mentioned that the *Cabinet Directive on Environmental Assessment of Policy, Plan and Program Proposals* was not reflected in the FSDS along with details on how it would align with the goals, targets and implementation strategies.

Respondents were also concerned about measurement and reporting of progress on the goals and targets. Many suggested that reporting occur more frequently than once every three years. In particular, respondents requested the inclusion of more detail and information on the Canadian Environmental Sustainability Indicators initiative and how it would be used to measure progress in the final strategy. Some also noted that future reports produced could include emerging issues and challenges to the goals and targets.

Accountability was also a theme expressed by respondents. Respondents wanted more information on how accountability would be put in place to encourage progress on the goals, targets and implementation strategies.

Respondents commented on the connection between costs, and the targets and implementation strategies. Some recommended strengthening the FSDS by including a financing plan that relates expenditures to targets.

## **OTHER CONCERNS**

Respondents offered a number of other suggestions including:

- directing additional resources to sustainable development;
- increasing engagement on and promoting the FSDS with citizens, NGOs and private industry;

- aligning the federal climate change strategy with provincial and territorial strategies as well as international agreements;
- linking sustainable development strategies and plans at the provincial, First Nations and community levels with the FSDS;
- establishing cooperative partnerships between the federal and provincial governments;
- acknowledging the underlying consumption and production patterns that affect climate change and loss of biodiversity; and
- developing inter- and intra-governmental data-sharing policy models that would encourage and allow the free exchange of geospatial data by data agencies with other government departments, other levels of government and external stakeholders.