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Industry Canada's Sustainable Development Consultation and Strategy

In-Depth Interviews with Senior Officials of Environmental NGOs

May 1996

Prepared for: Industry Canada

COMPAS Inc.
Multi-Audience Survey Research
Ottawa and Toronto

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Executive Summary

- Most people lack *detailed* knowledge about Industry Canada. However, virtually everyone had a *general* sense of the department and its mandate. The over-riding image is that of an economic department, with an economic development mandate: industry, jobs, competitiveness, exports. While no one expressed hostility toward the department, some tended to view it as being "on the other side of the table", even opposing environmental initiatives.

- Almost all NGOs were aware of the federal government's sustainable development strategy process. Many (but not all) expect their NGO to be involved with federal departments. Departments of prime interest are Environment Canada, Natural Resources Canada, and Industry Canada. Industry Canada is important because of its economic development focus and business clientele (its consumer role is much less known).

- NGOs have limited expectations for the SD strategy process. Expectations range from cynicism/pessimism to caution and guarded optimism. Reasons include the poor record of recent environmental consultations and a perceived lack of interest/political will on the part of the federal government.

- With respect to IC's consultation process, most wanted it to be structured and focused. Otherwise, people thought it would lack direction, be overly broad in scope, and more likely to end with a less focused, action-oriented strategy. Key suggestions include:
  - ⇒ ***clearly link objectives to IC mandate***: the need is to tell people from the start what is on (and not on) the table. Background information was seen to be needed to inform NGOs about what IC does (and doesn't do) to focus the consultation;
  - ⇒ ***prepare policy on funding assistance***: funding support is clearly an important issue. IC should develop a policy to govern funding requests. When doing so, keep in mind that if no funding is provided, NGOs will be reluctant to become involved in more than a superficial fashion;
  - ⇒ ***minimize consultation burden***: it is incumbent on IC to structure the consultation to minimize the effort required by stakeholders;
  - ⇒ ***provide good briefing materials/draft strategy***: all want to be well briefed on the process, and most want something to react to, some form of draft strategy (only one or two did not). This makes it easier for them to provide structured, detailed feedback.

- Most people did not provide detailed feedback on what they would like to see in IC's strategy. For some, this was pre-mature (having not given the matter

much thought). Others felt they did not yet know enough about IC's mandate to be able to comment intelligently. Having said that, key issues include:

- ⇒ ***the need for a practical, action-oriented focus***: there was a strong desire for a results-oriented, focused approach, and a widespread fear of general platitudes or broad principles;
- ⇒ ***the need to measure progress***: related to the above, many wanted the strategy to contain specific performance indicators, deadlines, and a critical path for the achievement of specific outcomes;
- ⇒ ***policy versus operational focus***: this is a key issue. It centres on the degree to which IC's strategy should focus on internal issues (e.g. administrative/technical issues related to the day-to-day operations) versus a broader focus on policies/regulations that have environmental implications that fall under IC's mandate (i.e. industry, consumers). Some wanted to use this process as an opportunity to influence business behaviour.

- ♦ For the most part, people had relatively low expectations for the department's strategy and action plan. While many were willing to wait and see, and give it the benefit of the doubt, people were often pre-disposed to believe that it would not be effective or meaningful.

Introduction

Industry Canada commissioned COMPAS to conduct a series of interviews with senior officials of environmental NGOs. The purpose was to investigate issues related to the development of the department's sustainable development strategy.

Recent changes to the Auditor General Act require that all federal government departments prepare sustainable development strategies and action plans. The objective is to integrate sustainable development principles and practices into the departments' policies, programs, services and operations. For Industry Canada, this is not just about "greening" the department, it is about finding ways to help Canadian businesses and consumers become more innovative in responding to the challenge of sustainable development.

This research was designed to obtain feedback to help the department put in place an appropriate consultation process and, ultimately, an effective sustainable development strategy. In total, 11 interviews were completed with senior officials of NGOs active in the environmental field. Appended is a list of the individuals/NGOs interviewed. Interviews took place April 29 to May 17, 1996, and averaged approximately 45 minutes in length.

We must emphasize that this is a very informal sounding of opinion on Industry Canada's consultation process and strategy; it is not a comprehensive review of either. In this report, participants' comments are provided in quotation marks. They are either actual verbatim quotes or have been paraphrased in a way that retains the intent of the original remark. For editorial purposes, the acronyms IC will sometimes be used for Industry Canada and SD for sustainable development. The principal investigator for this study was Stephen Kiar, Senior Partner responsible for COMPAS' Ottawa office.

Perceptions and Understanding of Industry Canada

Most people lack *detailed* knowledge or understanding about Industry Canada. They were often quick to volunteer this. However, virtually everyone had a *general* sense of the department and its mandate, at least in its broad outlines, with a few displaying a very good understanding (for some, this extended to awareness of IC's program, policy and advocacy roles).

The main impressions of Industry Canada focus squarely on its economic role:

- ◊ the over-riding image was that of an economic department, with an economic development mandate: industry, jobs, competitiveness, exports ("They're the overall voice for industry. They provide funding for industry");
- ◊ this was widely seen to be a legitimate role/function;
- ◊ no one expressed open hostility toward the department, nor did they reveal underlying hostility or resentment during the interview;
- ◊ however, many did view Industry Canada as a *champion* of economic development. As such, some tended to see the department as being "on the other side of the table", even opposing environmental initiatives ("They have an ideology: de-regulation, free market, etc. Their underlying assumptions are different from NGOs"; "I'm not sure what they do, but I have been told that they see environmental regulations as hindering development. That they even undermine environmental measures");
- ◊ a few felt that the department's relations with Canadian business and industry were too close, and that it takes business' interests at face value ("I think the relationship is too close. The controversy is not in Industry Canada's role, but in what it does, it's specific policies");
- ◊ the department was seen to have credibility with industry, and therefore in a position to influence change; and
- ◊ in light of its economic focus, IC is of interest to many NGOs. Some even said they would like more of a relationship with IC (e.g. more information sharing, awareness of each other's roles).

People's impressions of Industry Canada were based on a variety of things. Some had worked for the department previously (or for other federal departments), some had been involved in consultations that included IC, and some simply learned about IC through word of mouth, newspapers, etc.

A few were aware of its science and technology responsibilities. Few noted any role related to Canadian consumers. Many stated that they do <u>not</u> see IC as an environmental regulator.

Perceptions of the Federal Government SD Strategy Process

With few exceptions, NGOs were aware of the federal government's sustainable development strategy process. Most were aware through their NGO's ongoing monitoring of government (and other) activities in their area of interest, others through word of mouth.

Many (but not all) said they expect their NGO to be involved in consultations on SD strategies with federal departments. While a few are currently involved in a preliminary fashion with one or more departments, most are not. People tend to envisage a moderate level of involvement unless funding is provided ("The NGO's priorities will have to come first"; "The process is not high on our agenda").

Departments of prime interest to NGOs (in order of the frequency of expression) include:

1. Environment Canada
2. Natural Resources Canada
3. Industry Canada

These departments were seen to be the most relevant/important to this exercise, and were the only ones cited with any frequency. Others identified by one or two people include Finance Canada, Transport Canada, Health Canada, HRDC, Canadian Heritage (the parks portion), Department of Fisheries and Oceans, and Foreign Affairs and International Trade. While most did not venture a view, some felt that Environment Canada and NRCan might produce better strategies due to their long-standing interest and expertise in environmental issues.

Industry Canada was seen to be important because of its economic development focus and business clientele (its consumer role was much less known). While the department may not be accustomed to working with environmental NGOs, its SD strategy is seen to be one of the most important ("So much more hangs on it because of the business constituency. The potential impact is much greater. But because of this, I'm less confident about the outcome"; "Industry Canada has one of the strongest SD mandates of all, more even than Environment Canada, if it wants to exercise it").

In general, NGOs have very limited expectations for the federal government SD strategy process. On the positive side, many thought the exercise was valuable. It was seen to represent an opportunity to update departmental thinking on this issue and to focus attention on it.

However, few people thought the process would result in a meaningful outcome. Reasons include:

- ◊ the poor record of recent environmental consultations ("Consensus building has broken down over the past few years. Business no longer considers NGOs or government to be a threat or challenge, so they can ignore them and work the process to ensure a 'business as usual' outcome");
- ◊ a perceived lack of interest on the part of the federal government ("There is no political will to act by the government at this time"); and
- ◊ a perceived lack of deliverables ("The danger with these processes is that they will be extended and the deliverables will not be impressive").

Representative comments include:

- * "I'm sceptical as a result of federal government policies not related to sustainable development. Also, remember that SD has a genealogy. In all the previous efforts, the roles and responsibilities of government is what's been missing. It's a glaring omission"
- * "The prospects for a successful consultation are not very good. There is a lot of burn-out over consultations. Past successes were built on the basis of consensus and the willingness of business to act on a wider body of public opinion. That does not apply now"
- * "I don't know enough about it to offer an opinion about whether the process will be effective"
- * "I'm not sure of my own expectations. They're not too high. It's a very difficult task"
- * "Many NGOs are cynical about the government's commitment to sustainable development"
- * "The past record is all talk, no action"
- * "It remains to be seen. There are a lot of constraints. Bureaucrats will not put down what they cannot achieve. And they cannot change policy. Only the cabinet can do this"
- * "Keep in mind that these consultations are part of a bigger picture. They can be effective, but still lead to grave disappointments on the part of NGOs because the government is not willing to act. I think most of the complaints about previous consultations are related to <u>policy</u> -- the government not being prepared to exercise an effective legislative role -- and not focused on the process itself".

In short, many were quite sceptical about the process. Expectations ranged from cynicism/pessimism to caution and guarded optimism. However, there was little evidence of outright hostility or of the view that it was a complete waste of time and should not be done. Most were willing to defer judgment at this time. Given its scope and substantive focus, the exercise is generally seen to be important to NGOs.

Industry Canada's Consultation Process

As expected, there is widespread "consultation fatigue" among environmental NGOs. In addition, there are a number of other key factors that serve to shape the environment within which IC's consultation process will take place. These contextual issues include:

- ◊ most NGOs have fewer resources with which to pursue their mandate. A significant factor for some is reduced government funding. While not directly voiced, this appeared to "colour" their reactions to requests from government for feedback or involvement (at times, this issue almost seemed to be one of respect, or lack thereof);
- ◊ diminished resources have required NGOs to find alternative sources of funding, often in the form of management consulting (i.e. selling their expertise to those who need it). It has also required them to be more selective in their involvements (e.g. activities most relevant to mandate/ best potential for positive outcomes);
- ◊ with the foregoing in mind, many NGOs made it clear that they would be looking for funding support if they were to become involved in IC's consultation (i.e. more than commenting on a draft discussion paper). Assistance was seen to go beyond reimbursement of direct costs to include per diem funding for time/resources devoted to the exercise;
- ◊ environmental consultations undertaken in the recent past were often not seen to have been successful. As such, the NGO community is quite sceptical/pessimistic about the outcomes of such initiatives (certainly not energized). Related to this is a sense that environmental concerns have declined in importance in recent years; and
- ◊ many of those interviewed have had personal experience with previous consultations. As such, they can quickly size up a consultation as either "leading somewhere" or being mostly "window dressing". NGOs have no time or patience for the latter.

With respect to IC's consultation process, most people wanted it to be structured and focused. Otherwise, there was a belief that it would lack direction, be overly broad in scope, and more likely to end with a less focused, less action-oriented strategy. Key suggestions include:

- ◊ ***develop/communicate clear objectives***: a number of people cited the need for IC to be very clear about its objectives ("The key thing is up-front commitment to specific objectives"; "Don't have an open-ended approach. You need to be selective for effectiveness"; "Be clear about the horizons of the consultation, how far you are willing to stretch your thinking. And communicate this clearly up front. Otherwise, you will be flooded with comments that are too broad and not actionable");

- ***clearly link objectives to IC mandate***: as mentioned, many were not aware of what IC does. Background information was seen to be needed to inform NGOs about what IC does (and doesn't do) to focus the consultation. Otherwise, there is the potential for expectations to be too high (e.g. if NGOs thought the scope included all SD issues that involve business). In short, the need is to tell people from the start what is on (and not on) the table ("Define what the boundaries are"; "You need to educate and focus NGOs up front. Many will not know much about Industry Canada, or what to expect. Do educational work. Tell them what's on the table");
- ***clearly describe overall consultation process***: up front, ensure that stakeholders have a full, accurate understanding of the entire consultation process;
- ***minimize consultation burden***: given the observations noted above, it is incumbent on Industry Canada to structure the consultation in a way that minimizes the effort required by stakeholders. Some of the ideas cited below help do this. In addition, all potential process elements should be assessed against this criterion;
- ***provide good briefing materials/draft strategy***: all want to be well briefed on the process (e.g. objectives), and most want something to react to, some form of draft strategy (only one or two did not). This makes it easier for them to provide structured, detailed feedback. A key challenge is to ensure a balance between work done in advance and work left undone (so that it looks like the consultations matter). Many people also cited the need to keep all briefing materials short. No one has time to review long documents;
- ***minimize meetings***: reduced budgets and busy schedules mitigate against face-to-face meetings. If necessary at all, keep meetings to a minimum; and
- ***prepare policy on funding assistance***: funding support is clearly an important issue. IC should develop a policy to govern such funding requests. When doing so, keep in mind that if no funding is provided, NGOs will be reluctant to become involved in more than a superficial fashion. This will not stop them, however, from criticizing a process or final document that does not reflect the priorities as they see them (it was noted that media criticism is quick and low-cost).

Additional observations/suggestions related to IC's consultation process include:

- consider establishing a small advisory committee of carefully-selected NGOs to create a first draft of the strategy. In this way, IC can circulate a discussion document without having to pre-declare what it may/may not be willing to do (i.e. it is hard not to show biases in any document). Moreover, this makes it easier to manage and deflect instant criticisms;
- be clear about IC's own expectations for the consultation process (i.e. consensus versus fundamental changes within IC or by business);

- ◊ ensure that the process is open and transparent;
- ◊ beware of a "central Canada bias". Ensure there is sufficient regional input;
- ◊ plan the full consultation cycle before proceeding. This includes finding a way to feed back to NGOs what was heard if it is not in the strategy (saying why it is not there) so they will know they have been listened to. Otherwise, people may think the whole exercise was a waste of time. In addition, the process needs to be flexible to accommodate any changes;
- ◊ explain to participants how the consultation process works and how all the layers fit together (consultation, strategy development, implementation, etc.). There may be a strong belief that if participants come to an agreement or consensus, the government will automatically implement their recommendations;
- ◊ look at existing consultation models, both domestic and international;
- ◊ look specifically at the CME KNOX VOC multi-stakeholder model, with its advisory committee. Other positive elements of this model include allowing stakeholders to choose delegates, reviewing SD technical aspects through workshops/sessions, and inviting experts from other departments and countries to participate;
- ◊ consider using working groups via the Internet, or more use of electronic communications in general (lower cost);
- ◊ as much as possible, try to ensure a non-government focus. In part, this can be done by greater use of private sector consultants;
- ◊ talk to Charles Brassard of Environment Canada. He was seen to be an expert on recent environmental consultations and therefore a valuable resource;
- ◊ review: 1) article by David Bennett of the CLC on environmental consultations in Alternatives (attached), and 2) Porter article in Harvard Business Review; and
- ◊ do not forget to print everything on recycled/non-bleached paper and ensure that the whole consultation process is environmentally-friendly!

People were unclear about what role, if any, they wanted their group to play in the consultation process. While most would welcome an invitation, factors that would determine the extent of their participation include perceptions of the value of the exercise ("We'll have to see if it's worth it or not"), the funding available, the structure of the process, and the time/resources needed. A few were ready to become very involved (and would welcome this) if IC would give them money so that they could devote significant time and resources to this. Decisions on participation in consultations appear to be increasingly made in concert with a coalition or network of environmental NGOs.

In terms of which groups to involve in the consultation, the traditional list of players were identified. This includes most of the national associations we had

on the interview list: WWF, Sierra Club, Pollution Probe, Greenpeace, Canadian Environmental Network, recycling councils, Friends of the Earth, Energy Probe, Green Community Network (Ontario), and the Canadian Wildlife Federation.

Other ideas about potential participants include:

- ◊ include local community groups as well as national groups ("The key groups are not always national. You also need participation at the local grassroots level");
- ◊ research/create profiles of the NGOs. Ensure that specific areas of expertise are covered and a variety of backgrounds are represented;
- ◊ provide funding for a few key groups. These NGOs would then provide detailed input and could serve as surrogates or proxies for others in their area. This idea is predicated on the notion that funding cannot be provided to all, but that some funding may be necessary if more than cursory feedback is to be obtained;
- ◊ all groups are not equal. Some represent large membership bases, while others do not. This should be reflected in the weighting given to NGO input ("Some groups represent only themselves); and
- ◊ include also technical experts, scientists, international experts, universities, municipalities, provinces, businesses, and industry groups.

Substance of the Sustainable Development Strategy

Most people did not comment in detail on what they would like to see included in IC's strategy and action plan. For some, this was pre-mature (having not given the matter much thought). Others felt they did not yet know enough about IC's mandate to be able to comment intelligently.

Having said that, a number of key issues or factors were identified, including:

- ◊ ***the need for a practical, action-oriented focus***: there was a strong desire for a results-oriented, focused approach, and a widespread fear of general platitudes or broad principles ("Provide practical challenges for the department. The emphasis should be on departmental behaviour -- the actions and policies of IC"; "Motherhood statements are not useful. We want to know the details, what resources will be deployed, where, when, etc. The Ontario initiative started like this but soon became very general, platitudes");
- ◊ ***the need to measure progress***: related to the above, many wanted the strategy to contain specific performance indicators, deadlines, and a critical path for the achievement of specific outcomes ("It should have achievable, realistic goals, deadlines");

- ◊ ***policy versus operational focus***: this is a key issue. It centres on the degree to which IC's strategy should focus on internal issues (e.g. administrative/technical issues related to the day-to-day operations) versus a broader focus on policies/regulations that have environmental implications that fall under IC's mandate (i.e. industry, consumers). Some wanted to use this process as an opportunity to influence business behaviour ("How far is this going to be a policy review compared to a review of the administrative routines of government operations? They need to look at policy also"; "It should entail a policy review on how to deal with businesses and consumers"; "IC should review all legislation to ensure that it is consistent with SD"). Most appeared to feel that a predominantly internal, operational focus was of limited utility;
- ◊ ***priorities often related to NGO focus***: feedback on strategy content often focused on issues closely related to the specific mandates or orientations of the NGOs themselves (e.g. a consumer, recycling, pollution, or land-use focus). One would expect their future input to continue this pattern; and
- ◊ ***beware of SD breadth***: it was noted that SD is a very broad term that can mean "all things to all people". This can hamper the development of a focused, actionable strategy. It may be necessary to re-define this term at the start of the exercise for the purposes of this process.

Specific issues that people identified for inclusion in the strategy include:

- ◊ a communications/educational component to communicate about SD within IC and outside. This might include giving meaning to SD for consumers. The term contains a philosophical ring and requires an actionable translation (so that consumers can actually do something). This could also include advertizing the SD program with the Canadian public, including the school system ("like ParticipAction");
- ◊ under the Technologies Partnership Program, put a priority on SD technologies;
- ◊ make IC contracts/grants conditional on meeting environmental goals/ regulations (e.g. apply same thinking behind giving conditional grants to developing countries to Canada);
- ◊ include recommendations on sustainable land use (i.e. public landscapes) and develop more cost-effective management techniques that apply to municipal land managers and conservation authorities;
- ◊ establish a pool of 12-24 strategic planners from the private sector to advise and recommend solutions to potential hurdles/obstacles;
- ◊ set-up workshops/training sessions to teach employees about SD;
- ◊ develop additional legislation/stronger laws to encourage environmental industries to grow. Look to other countries such as the U.S. and Germany where strong legislation in the forestry and air pollution

sectors has given birth to new and viable environmental industries (i.e. recycling of methane gas);

- ensure strong commitment to SD within IC. Include it in the department's policy process and ensure that each policy area/function has a process for implementing and monitoring SD;
- some direction/measures that can fundamentally change Canadians' lifestyle choices. For instance, this could entail making it easier for consumers to plug into the environment (i.e. access to recycling boxes);
- re-evaluate financial assistance given to the non-renewable resource sector;
- IC to take the lead in the National Packaging Protocol and in the manufacturing sector by creating a *national* set of rules and regulations (rather than the current system of ten different provincial ones);
- include a focus on resource conservation and pollution prevention technologies ("We need to support and recognize their value and bring them into the mainstream");
- look at policies to encourage activities that promote SD. This could involve shifting government support to firms/industries/practices that promote SD and away from those that hamper SD ("Don't just look at industry as a clientele. Take a broader view");
- present a mix of policy instruments (e.g. voluntary, subsidies, incentives, regulations, legislation) and emphasize the preferred tools in the strategy. Do not, however, rely on one type only. It might be beneficial to tabulate and communicate the gains that have been achieved using the voluntary approach. As well, be clear about the basic message (e.g. voluntary approach preferred); and
- be open to legislative or regulatory changes.

People's best hopes for the strategy focused on it resulting in meaningful, fundamental change ("I hope it will begin to re-position industrial strategy"; "I'd like it to serve as an international model"). Conversely, their main concerns centred on it being a "stay-the-course" document that did not result in meaningful change ("window dressing"), and that the process will be a waste of time and energy ("I fear it will be completely irrelevant"; "I'm concerned that people will not have the authority to carry out the actions. That it will not trickle down to those who need to implement it").

With the latter in mind, the following were identified as things Industry Canada should avoid doing in its strategy and action plan. That is, what it should <u>not</u> contain: broad statements/platitudes, non-measurable principles, or long-term, complicated, time-consuming goals ("Be realistic, achievable").

For the most part, people had relatively low expectations for the department's strategy and action plan. While many were willing to wait and see, and give it the benefit of the doubt, people were often pre-disposed to believe that it would not be effective or meaningful. For the reasons why, see the section on expectations related to the overall federal government SD strategy process. Most were not comfortable commenting on how Industry Canada's strategy would compare with those of other federal departments.

Most were uncertain about the level of involvement they would like their NGO to have regarding implementation of IC's strategy. There was a strong sense of "wait and see". Key determinants include the relevance of the strategy to the NGO's responsibilities, the perceived value/effectiveness of the strategy, and the time/resource requirements related to being involved.

Final Advice

The following presents some of the parting advice offered to IC on the consultations or the strategy itself:

* "It would be easy to just focus on what the department does and how it works. But in the background are the actual policies. These must also be reviewed"
* "We need a commitment to end results. Something of substance"
* "Make sure there is follow through. It's not worth anything if there are no teeth"
* "Don't oversell the strategy. Don't make the typical government mistake of trying to market or sell it as 'God's gift to the world'"
* "Worry about the strategy's substance, and not on the packaging and selling of it"
* "IC needs to be able to gather views and translate them into something tangible. Often people try to explain SD as a win-win strategy, but that's not enough. There are often hard choices between SD and development. There needs to be a realistic, tangible perspective in their strategy"
* "There's been too much rhetoric. We need hard choices made, and action plans to implement them. Industry Canada lacks leadership on this issue. I'm not sure their SD strategy will be meaningful, based on their past history"
* "Without knowing more about Industry Canada, it would seem they have a technology mandate relative to SD, not a lifestyles one"
* "Industry Canada should seek a visible leadership role. It should try to create an imaginative but achievable strategy that would advance SD but not depart from its mandate of competitiveness, markets, exports and development"

* "I'd like to see acknowledgment that business prosperity is not the only objective of IC. The concept of prosperity should be changed in light of SD. Competitiveness should not be the only value"
* "We need a paradigm shift. We need to understand where we are and how we get there (i.e. SD)"

List of Participants

1. Pollution Probe Foundation
   Ken Ogilvie
   Executive Director

2. Canadian Wildlife Federation
   Sandy Baumgartner
   Director of Communications

3. Enviro-Accès
   Phillipe Morel
   Executive Director

4. Environmental Law Centre
   Donna Tingley
   Executive Director

5. Canadian Nature Federation
   Caroline Schultz
   Program Coordinator

6. Association of Municipal Recycling Coordinators
   Linda Varangu
   Executive Director

7. The Evergreen Foundation
   Geoff Cape
   Executive Director

8. Green Communities Network
   Clifford Mayne
   Coordinator

9. STOP
   Bruce Walker
   Office Manager

10. Canadian Association of Recycling Industries
    Len Shaw
    Director of Communications

11. Canadian Labour Congress
    Dave Bennett
    National Director, Health, Safety and Environment

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