



Horizontal Evaluation of the Federal Contaminated Sites Action Plan (FCSAP) 2018-2019 to 2021-2022

At a glance

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Program Overview

Since its inception, the primary objective of the Federal Contaminated Sites Action Plan (FCSAP) program has been to reduce environmental and human health risks from known federal contaminated sites and associated federal environmental liabilities. FCSAP aims to address the federal contaminated sites that pose the highest risks to human health and the environment, through remediation and risk management (R/RM).

It does this by providing funding to federal departments, agencies and consolidated Crown corporations to undertake assessment and remediation activities on contaminated sites for which they are responsible. FCSAP was established in 2005 as a fifteen-year program with funding of \$4.54 billion and was renewed for an additional 15 years (2020 to 2034) with \$1.16 billion announced in Budget 2019 for the first five years.

Program partners include custodians, the FCSAP Secretariat (within ECCC), the Treasury Board of Canada Secretariat (TBS), and Expert Support Departments (ESDs). Governance committees and working groups provide strategic oversight, direction, and planning functions.

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Scope and Methodology

Scope

The Federal Contaminated Sites Action Plan evaluation covers the 4-year period between 2018-2019 to 2021-2022. The evaluation focusses on the following themes:

Governance & Reporting

Performance

External and Emerging Issues

Impact on Indigenous Peoples and Communities

Methodology

A variety of sources were used, including :

Administrative, Performance and Financial Data Review

Available performance measurement data; data available from the Federal Contaminated Sites Inventory.

Key Informant Interviews

31 interviews were conducted with 49 representatives of 17 custodian and ESDs including the FCSAP Secretariat.

Case Studies

Five case studies focused on the evaluation themes.

Document Review

Documents and resources housed on the Interdepartmental Data Exchange Application; Reports on plans and priorities; Annual reports and other documents of relevance.

Comparative Program Analysis

British Columbia Crown Contaminated Sites Program; US EPA Superfund; Government of New Zealand Contaminated Sites Remediation Fund.



Governance & Reporting

FCSAP has a complex governance, oversight, planning and performance measurement structure that has evolved over the evaluation period. These changes have generated positive intended impacts such as greater involvement of senior management and alignment of performance measurement with both the core program objectives and additional commitments.

However, the broad range of performance indicators (PIs) and program commitments (PCs) have resulted in an increase in administrative burden and potential distractions from core program responsibilities. Despite challenges, the FCSAP Secretariat and the overall management of FCSAP is viewed as strong, especially given the complexity of the program.

Performance

FCSAP has made progress towards its intended targets but has faced challenges, over the evaluation period, to spend its total budget allocation due to issues such as procurement issues / delays, government funding cycles, and short windows for field work in northern settings among others. Fortunately, unspent funds are almost entirely available to custodians in future years.

Reducing overall liabilities to the extent planned has also been challenging for FCSAP. Reduction of environmental liability and future expenditures by Canada is an important objective, but project costs can increase for a variety of reasons and therefore offset the progress made through Remediation/Risk Management activities.



Findings (2 of 2)

External and Emerging Issues

FCSAP and custodians face external and emerging issues that can impact the performance and efficiency of their work. While each external and/ or emerging factor is unique, they impact the work of FCSAP in common ways including necessitating higher financial inputs for the same or reduced outputs, creating potential delays and reductions in the scope of remediation projects, and forcing a re-evaluation of project priorities and resource allocations.

The program has been responsive to challenges; for example, by actively communicating workplans to industry, or by developing guidance documents that help custodians consider the impacts of these issues.

Impact on Indigenous Peoples and Communities

Early data shows that changes made to site eligibility criteria has increased the number of funded sites on reserve lands and in the North, resulting in projects being carried out that otherwise would not have been. For eligible projects funded in 2021-2022 in the North and on-Reserve, nearly one-third (29%-30%) of total contract dollars were attributed to Indigenous owned businesses.

More than half (55%) of the person-hours of on-Reserve projects were worked by Indigenous Peoples, however the percentage worked by Indigenous women was much lower (3%).

Recommendations

1

ECCC's Assistant Deputy Minister of Environment Protection Branch, in consultation with Federal Contaminated Sites Action Plan delivery partners, should review its Performance Measurement Strategy to streamline the number of Performance Indicators and Program Commitments, to ensure that performance measurement information generates meaningful value for decision making and allows for efficient reporting.

2

ECCC's Assistant Deputy Minister of Environment Protection Branch in collaboration with Federal Contaminated Sites Action Plan (FCSAP) program partners, should develop strategies to highlight the impacts of projects and develop a more compelling narrative about the role of FCSAP in generating socio-economic benefits for Indigenous Peoples.

3

ECCC's Assistant Deputy Minister of Environment Protection Branch, in consultation with Federal Contaminated Sites Action Plan delivery partners, should design and implement mechanisms to report on progress made towards reducing environmental liability that are not impacted by in-Phase fluctuations in liability estimates.



Management Action plan (1 of 3)

Recommendation 1 : ECCCC's Assistant Deputy Minister of Environment Protection Branch, in consultation with Federal Contaminated Sites Action Plan delivery partners, should review its Performance Measurement Strategy to streamline the number of Performance Indicators and Program Commitments, to ensure that performance measurement information generates meaningful value for decision making and allows for efficient reporting.

Action 1 : The Federal Contaminated Sites Action Plan (FCSAP) Secretariat is updating the Performance Measurement Strategy for Phase V in consultation with FCSAP partners. The new Performance Measurement Strategy will include a streamlined list of performance indicators and program commitments, which will be more pertinent and more meaningful to decision makers and the public, and which will allow monitoring and reporting against program objectives and government priorities in a more efficient and effective manner.

Deliverable	Timeline	Responsible
Phase V Performance Measurements Strategy, including performance indicators, program commitments and associated methodologies.	September 30, 2025	DG, Environmental Protection Operations Directorate

Recommendation 2 : ECCC’s Assistant Deputy Minister of Environment Protection Branch in collaboration with Federal Contaminated Sites Action Plan (FCSAP) program partners, should develop strategies to highlight the impacts of projects and develop a more compelling narrative about the role of FCSAP in generating socio-economic benefits for Indigenous Peoples.

Action 1 : The Federal Contaminated Sites Action Plan (FCSAP) Secretariat, in collaboration with FCSAP program partners, will develop strategies to highlight the impacts of projects and develop a more compelling narrative about the role of FCSAP in generating socio-economic benefits for Indigenous Peoples.

Deliverable	Timeline	Responsible
Communications products on Federal Contaminated Sites Action Plan’s positive impact on Indigenous peoples and communities.	March 31, 2027	DG, Environmental Protection Operations Directorate

Management Action plan (3 of 3)

Recommendation 3 : ECCC’s Assistant Deputy Minister of Environment Protection Branch, in consultation with Federal Contaminated Sites Action Plan delivery partners, should design and implement mechanisms to report on progress made towards reducing environmental liability that are not impacted by in-Phase fluctuations in liability estimates.

Action 1 : The Federal Contaminated Sites Action Plan (FCSAP) Secretariat has developed and will implement a new performance indicator that tracks the “amount of environmental liabilities offset through FCSAP remediation spending”. It is part of the Horizontal Initiative table, which is an annex to ECCC’s Departmental Results Report. This new indicator will allow the program to tell a better performance story by showing how much liability has been reduced compared to a scenario under which the program would not have existed.

Deliverable	Timeline	Responsible
A new indicator included in the Federal Contaminated Sites Action Plan Horizontal Initiative table for 2025-2026.	September 30, 2025	DG, Environmental Protection Operations Directorate