



12 July 2010

Hon. Jim Prentice, PC, MP
Minister of the Environment
c/o Federal Sustainable Development Office
10 Wellington Street, 25th Floor
Environment Canada
Gatineau, QC K1A 0H3
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Re: CIELAP comments on draft Federal Sustainable Development Strategy

Dear Minister Prentice;

Thank-you for this opportunity to provide our comments on the draft *Federal Sustainable Development Strategy* (FSDS) as put forward by the Government of Canada in March 2010. With public participation an essential component of the theory and practice of sustainable development (sustainability), we appreciate the Canadian Government engaging in sustainability practices as it develops our country's first FSDS.

CIELAP

CIELAP is a sustainability think-tank with a 40-year history of providing balanced, objective, evidence-based environmental and sustainability research in the public policy arena. Historically, one of our areas of research focus has been in environmental governance, an area that over the past 10 years we have expanded to that of sustainability governance. Specifically as these relate to the topic of Sustainable Development Strategies (SDS), CIELAP has published:

- 1) "Sustainable Development in Canada: A New Federal Plan" (2001), a report that spoke to the need for an FSDS in Canada and considered ways that a Canadian FSDS could be structured;
- 2) "Sustainability in Canada: 2005 Update" (2005), an update of our 2001 report, which identified a set of sustainability priorities;
- 3) "Sustainable Development in other national jurisdictions" (2009), which reviewed international best practices in SDS; and
- 4) a "Brief on Implementation of the Federal Sustainable Development Act" (2009, updated in 2010), which provided an overview of this new Act

Initial congratulations

CIELAP would like to begin our comments by congratulating the Government on developing the first-ever FSDS for Canada. The significance of this important step should not be lost on readers of the draft FSDS or on practitioners in the sustainability/environmental field. CIELAP considers this to mark an important milestone in Canada's path toward sustainability and we gladly acknowledge this historic step taken by our federal government. It is well known that leadership so often begins at the top and, with this draft FSDS, the

Government of Canada is demonstrating to all sectors of Canadian society the essential importance of integrated planning and action for sustainable development.

CIELAP's internal process to review the draft FSDS

Prior to the Government of Canada's release of its draft FSDS, CIELAP had already been engaged in a research project to review the SDS of various departments and agencies of the federal Government. This earlier work of ours complimented our following comments on the draft FSDS.

To prepare for these comments that CIELAP is submitting on the Government's draft FSDS, we advise that our assembled a team of scholarly and legal researchers who contextually reviewed international and Canadian government/parliamentary guidance documents related to SDS. These documents primarily included: *Agenda 21*¹; the Organisation for Economic Co-operation and Development (OECD) and United Nations Development Programme (UNDP) "Sustainable Development Strategies: A Resource Book" (2002)²; the OECD's *Statistics Brief on "Measuring Sustainable Development"* (2005)³; the International Council for Local Environmental Initiatives (ICLEI) "THE LOCAL AGENDA 21 PLANNING GUIDE: An Introduction to Sustainable Development Planning" (1996)⁴; the federal government's "A Guide to Green Government" (1995)⁵; and "Sustainable Development Strategy Management Review" (2008)⁶; the Commissioner for Environment and Sustainable Development (CESD) "Report to Parliament" (1998)⁷ and "Managing Sustainable Development: A Discussion Paper" (2007)⁸; SDS of various federal departments⁹; and the "Federal Sustainable Development Act" (2008)¹⁰ of the Parliament of Canada. We also successfully conducted or attempted telephone interviews with those individuals in five selected federal departments who had responsibility for leading the development of the SDS in their department. We then reviewed the draft FSDS¹¹, before finally reviewing the "CESD Comments on the Draft Federal Sustainable Development Strategy".

¹ UN Department of Economic and Social Affairs - Division for Sustainable Development (2004). *Agenda 21* [online]. Available from: <http://www.un.org/esa/sustdev/documents/agenda21/english/agenda21toc.htm> [Accessed: 03 March 2010].

² OECD - Organisation for Economic Co-operation and Development, and United Nations Development Programme (UNDP). 2002. *Sustainable Development Strategies: A Resource Book*. Paris and New York: Earthscan Publications Ltd.

³ OECD (2005). *Measuring Sustainable Development* [online]. Available from: <http://www.oecd.org/dataoecd/60/41/35407580.pdf> [Accessed: 01 July 2010].

⁴ International Council for Local Environmental Initiatives (ICLEI) (1996). *THE LOCAL AGENDA 21 PLANNING GUIDE: An Introduction to Sustainable Development Planning* [online]. Available from: http://www.idrc.ca/en/ev-9322-201-1-DO_TOPIC.html [Accessed: 21 June 2010]. Ottawa, IDRC.

⁵ Government of Canada – Minister of Supply and Services (1995, updated 2006). *A Guide to Green Government* [online]. Available from: (the link has now been disconnected by the Government of Canada). [Accessed: 17 February 2010].

⁶ Environment Canada – Strategic Policy Branch (2008). *Sustainable Development Strategies Management Review* [online]. Available from (link now been disconnected by Government of Canada). [Accessed: 17 February 2010].

⁷ Office of the Auditor General of Canada – Commissioner of the Environment and Sustainable Development (1998). *1998 May Report of the Commissioner of the Environment and Sustainable Development* [online]. Available from: http://www.oag-bvg.gc.ca/internet/English/parl_cesd_199805_e_1144.html [Accessed: 30 March 2010].

⁸ Office of the Auditor General of Canada – Commissioner of the Environment and Sustainable Development (2010). *Managing Sustainable Development: A Discussion Paper* by the Commissioner of the Environment and Sustainable Development [online]. Available from: http://www.oag-bvg.gc.ca/internet/English/sds_fs_e_33574.html [Accessed: 30 March 2010].

⁹ Office of the Auditor General of Canada – Commissioner of the Environment and Sustainable Development (2009). *Federal Departments and Agencies: Departments and agencies required to prepare a sustainable development strategy and respond to environmental petitions* [online]. As available from: http://www.oag-bvg.gc.ca/internet/English/pet_fs_e_17706.html [Accessed: 17 February 2010].

¹⁰ Department of Justice – Government of Canada (2008). *Federal Sustainable Development Act* [online]. Available from: <http://laws.justice.gc.ca/en/showtdm/cs/F-8.6> [Re-accessed: 17 February 2010].

¹¹ Environment Canada - Sustainable Development Office (2010). *PLANNING FOR A SUSTAINABLE FUTURE: A FEDERAL SUSTAINABLE DEVELOPMENT STRATEGY FOR CANADA – CONSULTATION PAPER* [online]. Available from: http://www.ec.gc.ca/dd-sd/9E362EF7-74F6-4189-8AAF-B966EB2F9157/Planning_for_a_Sustainable_Future_a_Federal_Sustainable_Development_Strategy_for_Canada.pdf [Accessed 30 March 2010].

Canada's international commitment to adopt an SDS under *Agenda 21*

Canada adopted *Agenda 21* - often referred to as "an action plan for sustainable development" - at the 1992 United Nation's *Earth Summit* held in Rio de Janeiro, Brasil. Under *Agenda 21*, Canada has an international commitment to adopt an SDS that equally intertwines each of the social, economic and environmental pillars of sustainability. It has this commitment under the following sections of *Agenda 21*:

Preamble

[Agenda 21's] successful implementation is first and foremost the responsibility of governments. National strategies, plans, policies and processes are crucial in achieving this. International cooperation should support and supplement such national efforts.

Chapter 8

Governments, in cooperation, where appropriate, with international organizations, should adopt a national strategy for sustainable development based on, inter alia, the implementation of decisions taken at the Conference, particularly in respect of Agenda 21. This strategy should build upon and harmonize the various sectoral economic, social and environmental policies and plans that are operating in the country. The experience gained through existing planning exercises such as national reports for the Conference, national conservation strategies and environment action plans should be fully used and incorporated into a country-driven sustainable development strategy. Its goals should be to ensure socially responsible economic development while protecting the resource base and the environment for the benefit of future generations. It should be developed through the widest possible participation. It should be a thorough assessment of the current situation and initiatives.¹²

CIELAP supports the "CESD Comments on the Draft Federal Sustainable Development Strategy"

We offer our support for all of the well-considered "CESD Comments on the Draft Federal Sustainable Development Strategy".¹³ We draw out for special attention and support the following of the CESD's observations, these being:

- "... only 10 of the 28 departments and agencies subject to the *Federal Sustainable Development Act* are referred to in the draft federal strategy in relation to implementation....While each of the 10 departments and agencies mentioned in the draft strategy is responsible for aspects of implementation, none is identified as having overall responsibility for meeting each target, as required by the Act."
- "Further, since the draft strategy lists implementation strategies for these 10 departments and agencies, it is not clear what they are expected to include in their own sustainable development strategies, which are required by next year. It is also unclear what is expected of the 18 departments and agencies that are not specifically mentioned in the draft strategy."
- "The need to integrate economic, environmental, and social objectives in decision making is noted in section 5 of the Act [Federal Sustainable Development Act] as a basic principle of sustainable development. Section 9(1) says that the strategy is to be based on the precautionary principle. The draft strategy does not address either integration or the precautionary principle. We are therefore concerned that the draft strategy represents a departure from the basic principles of sustainable development referenced in the Act and may impede the integration of economic, environmental, and social objectives in decision making."

¹² OECD - Organisation for Economic Co-operation and Development, and United Nations Development Programme (UNDP). 2002. *Sustainable Development Strategies: A Resource Book*. Paris and New York: Earthscan Publications Ltd.

¹² OECD (2005). *Measuring Sustainable Development* [online]. Available from: <http://www.oecd.org/dataoecd/60/41/35407580.pdf> [Accessed: 01 July 2010] (page 13, Box 2.3).

¹³ Office of the Auditor General of Canada, Commissioner of the Environment and Sustainable Development (2010). CESD Comments on the Draft Federal Sustainable Development Strategy [online]. Available from: http://www.oag-bvg.gc.ca/internet/English/cesd_fs_e_33888.html [Accessed: 21 June 2010].

- “... on whether the targets and implementation strategies in the draft strategy can be assessed. Many of the targets and implementation strategies lack results, expectations, baselines, benchmarks, or performance indicators.... while an activity report may be possible, progress toward the goals and targets cannot be objectively assessed based on the information provided in the draft strategy.”
- “47. While the draft strategy states that a sustainable economy would require that environmental considerations inform every decision made, there is no description of how integrated decision making would be put into practice and only passing references to the precautionary principle. We are therefore concerned that the draft strategy as currently structured represents a departure from the basic principles of sustainable development referenced in the Act and may impede the integration of economic, environmental, and social objectives in decision making.”
- “48. In its groundbreaking 1987 report *Our Common Future*, the World Commission on Environment and Development noted that “approaches to environment policy can be broadly characterized in two ways. One, characterized as the ‘standard agenda’ reflects an approach to environmental policy, laws and institutions that focus on environmental effects. The second reflects an approach concentrating on the policies that are the sources of those effects. These two approaches represent distinctively different ways of looking both at the issues and at the institutions that manage them.”

With regards to the first and second bullet points of above as copied from the CESD’s comments, these are also of noted concern to CIELAP for at least the following reason:

- The lack of clarity that underlies these two points has come through in our noted telephone interviews with individuals in selected federal departments. Those interviews suggest to us a possible “hurry up and wait” attitude in departmental sustainability planning. That is, departments may now be in a holding pattern as they wait for the FSDS process to be completed before they complete their next round of departmental SDS, thereby suggesting that real sustainability action in federal government departments and agencies may now be on hold pending the outcome of this process. To our view, sustainability planning and action should be a required, ongoing, process in government (and society) and not one that is put on-hold pending other processes. To that end we encourage greater clarity be an integral part of any FSDS developed by the federal government, as this will then provide greater clarity to federal departments and agencies so that they can then actively continue with ongoing sustainability activities in the planning and action arenas.

In regards to point 48 copied above from the CESD’s comments, for CIELAP:

- it seems clear from our interpretation of the Government of Canada’s draft FSDS that the draft FSDS follows the first approach of above, the one “characterized as the ‘standard agenda’”. A “standard agenda” as identified in 1987 is clearly an antiquated approach now some 23 years later. Reviews of the SDS of other developed nations comparable to Canada will show general support for the second approach noted above. CIELAP encourages the Government of Canada to, in essence, “catch-up” by having its finalised FSDS follow this second approach as originally identified in *Our Common Future*.

CIELAP's own comments on the draft FSDS

On its draft FSDS, the specific request the Government of Canada asks of all Canadians it is elected to represent is:

“Environment Canada is looking for guidance from Canadians on the *basic structure* of a government-wide strategy that will do a better job of incorporating environmental considerations into policy and program decisions in departments and agencies.” *[Emphasis our own.]*

For the purpose of our comments, CIELAP has interpreted this “basic structure” parameter in the following, two, separate ways:

- A) How the basic structure of government can be bettered for governing for sustainability; and
- B) How the basic structure of the draft FSDS document can be bettered as a tool for sustainability planning and action.

A) How the basic structure of government can be bettered for governing for sustainability

1) Sustainable Development is a profound rethinking of the design of human societies

“Achieving sustainable development will require deep structural changes and new ways of working in all areas of economic, social and political life.”¹⁴

As the draft FSDS notes on Page 1, “...the concept of sustainable development sees three equal and mutually reinforcing pillars, all of which must be strong: economic, social and environmental.” In our post-Enlightenment human societies – noticeably so, it seems, of those human societies rooted in Anglo-Saxon traditions - environmental considerations have largely been ignored and economic considerations have frequently trumped the very societal element that encompasses human societies at their core. Through the idea of sustainable development, humans are regaining the awareness that our human societies, from which economic systems themselves actually flow, are even themselves more deeply rooted in the environment of our shared planet Earth. Economic systems rooted in 18th century thinking – flowing, as that thinking has tended, from the now scientifically-outdated concept of “unlimited growth” that directly collides with the Laws of Physics and other modern scientific understandings – cannot be the basis on which human societies design their common future. A sustainable development grounded in science also advises that a sustainable future for human beings cannot root itself in traditional, hierarchical, structures that intentionally *silo* (separate) thinking and action. It, instead, calls for *non-linear* structures and the application of *systems thinking*¹⁵, which are more aligned with the workings of Earth’s ancient ecosystems.

Human societies – whether of their governments, businesses and industry, and civil society – are tasked by sustainable development to find ways to integrate in a horizontal manner and non-linear ways each of the social, economic and environmental pillars of sustainability. Our human societies are also called on by the sustainable development as described in *Our Common Future* to pursue active public participation in decision-making. CIELAP does not even begin to suggest that the process of human societies transitioning to these newer ways of sustainability thinking and action will be easy, fast or obvious. What we do suggest is that the process must be begun and must be begun in complete earnestness.

¹⁴ OECD - Organisation for Economic Co-operation and Development, and United Nations Development Programme (UNDP). 2002. *Sustainable Development Strategies: A Resource Book*. Paris and New York: Earthscan Publications Ltd. (page 27).

¹⁵ One of the finest sources that speaks to “systems thinking” is from the famed (in sustainability circles): Meadows, Donella H. 2008. *Thinking in Systems: A Primer*. White River Junction, VT, USA: Chelsea Green Publishing.

Thus, to help foster a sustainable society, the basic structure of government itself needs to change for sustainability. Departments and agencies modelled on sectors (silos) and sectoral- (silo)-thinking, or modelled on hierarchies and limited public participation in decision-making, now need to begin the process of re-designing themselves to the reverse of tradition: that is, to move toward integrated and horizontal structures, systems thinking, and actively seeking ways to meaningfully engage the public in decision-making. An FSDS is the exact and perfect tool for any government, including the Government of Canada, to begin and further this process of change.

This leads to our comments under this “Section A” of our broader comments, they being that:

- i) This draft FSDS misses an important opportunity, even an essential requirement, to begin the inevitable process of restructuring the Government of Canada so it can be the primary and active leader and example in the sustainable development of Canada. We encourage that the final FSDS incorporate ways for the federal government to truly and actively begin the process of moving toward the integrated and horizontal structures and systems thinking called for by sustainable development. Simultaneously working toward identifying more active ways for the government to seek public participation in - at the very least - sustainability-related decision-making;
- ii) An effort should be made in the revision process of the FSDS to assign joint departmental responsibility for tasks, where one department is the lead department and the other the collaborator/partner as is necessary. This will then begin the process of establishing more integrated and horizontal structures within federal departments. That said, caution may need to be exercised to not have too many collaborators/partners as this may paralyse effective cooperation and accomplishment of desired results. This recommended action will also help resolve the conceptual differences in the concepts and approaches between departments that have been noted in various of the CESD Reports to Parliament; and
- ii) While admittedly beyond the general purview this current consultation process, that the Government of Canada, through the Office of the Prime Minister, appoint Canada’s very first *Minister (or Minister of State) for Sustainable Development*. This Minister would be given the primary role at the cabinet table for designing, developing, fostering, implementing, coordinating and following-up on sustainability activities within and amongst the sitting cabinet and their related departments and agencies. It is often said that for its success, sustainable development requires a champion at the highest of political levels. The appointment of a Minister for Sustainable Development would become one of the strongest champions for sustainable development in the federal government by their sitting at the federal cabinet table. Such a Minister would also provide some of the strongest proof possible that the federal government did take sustainability seriously and was more fully ready to transition the federal government to the new approaches required for our country’s sustainable development.

B) How the basic structure of the draft FSDS document can be bettered as a tool for sustainability planning and action

“... the goals of economic and social development must be defined in terms of sustainability in all countries... Interpretations will vary, but must share certain general features and must flow from a consensus on the basic concept of sustainable development and on a broad strategic framework for achieving it.”¹⁶

1) *There is a difference between a national SDS and a national environmental strategy*

“As a hybrid of... three planning traditions [strategic planning, community-based planning, and environmental planning], sustainable development planning makes use of the different planning methods and tools of each tradition in assisting communities to:

- equally factor economic, community, and environmental conditions into the design of development projects and service strategies;*
- fully engage relevant interest groups and, in particular, service users in the development of service strategies that meet their needs;*
and
- create service strategies that can be sustained because they focus on underlying systemic problems rather than problem symptoms, and because they consider long-term trends and constraints.”¹⁷*

SDSs, as we think is obvious, are about “sustainable development”. Again, as the draft FSDS notes on Page 1, “...the concept of sustainable development sees three equal and mutually reinforcing pillars, all of which must be strong: economic, social and environmental.” Yet the draft FSDS then goes on to often speak of something termed as “environmental sustainability”, which in and of itself is not a view of sustainable development that reinforces all three of its acknowledged equal pillars.

Experimenting with the implementation of new ideas, such as with an SDS, is never easy. Consider that it took over two hundred years for Adam Smith’s ideas related to “free markets” to take a more firm root in human societies. And so too it will not be easy to find ways to intertwine each of the social, environmental and economic aspects of sustainable development – as well as stakeholder engagement and a focus on systemic problems rather than on symptoms - into governmental and societal planning. Yet this is exactly what is required of a national SDS: to find nationally relevant, even new and original ways to achieve the required intertwining.

A strategy that focuses on “environmental sustainability” and environmental challenges is not an SDS - it is merely an environmental strategy. There is an essential and obvious difference between the two. Thus, as we interpret it, the draft FSDS as currently written is not an SDS but more akin to an environmental

¹⁶ UN Documents Cooperation Circles (1987). *Report of the World Commission on Environment and Development: Our Common Future – Chapter 2, Introduction, Part 2* [online]. Available from <http://www.un-documents.net/ocf-02.htm#I> [Accessed: 01 July 2010].

¹⁷ International Council for Local Environmental Initiatives (ICLEI) (1996). *THE LOCAL AGENDA 21 PLANNING GUIDE: An Introduction to Sustainable Development Planning* [online]. Available from: http://www.idrc.ca/en/ev-9322-201-1-DO_TOPIC.html [Accessed: 21 June 2010]. Ottawa; IDRC. (page 5).

strategy for Canada. We therefore encourage the government of Canada to revise the draft FSDS with a view toward finding the required ways to have the “three equal and mutually reinforcing pillars” of sustainable development -social, economic and environmental factors - all incorporated in to the finalised FSDS.

- 2) *Follow an internationally-accepted ‘framework’ in the development of the “basic structure” of the SDS*

“Elements of a national SDS

- a) Integration of economic, social and environmental objectives, and balance across sectors, territories and generations;*
- b) Broad participation and effective partnerships;*
- c) Country ownership and commitment;*
- d) Developing capacity and enabling environment;*
- e) Focus on outcomes and means of implementation.”¹⁸*

Again, we acknowledge that planning for sustainability is not an easy task. Sustainability planning can still be considered a new concept, one that countries continue to experiment with as they strive to create balance for their populations. Canada is not different in this regard. It is understood that sustainable development, by necessity, will look differently wherever and whenever it is practiced – by virtue of things as diverse as cultural, social, linguistic, economic, environment and ecosystem variations. Thus, there is no real template in the specific local, regional, national or even global approaches that are taken with sustainability. As the Government of Canada has noted in its draft FSDS: “The proposed Strategy would establish the basis to strengthen sustainable development planning and reporting for the long term. It does not promise an overnight fix...”

That said there are some general, internationally-accepted “frameworks” to follow in the development of the “basic structure” of an SDS. In ‘structure’, SDSs have borrowed the strategic planning model from the business world and adapted it to sustainability planning. So the structural model is not really new, although the approach that it follows for sustainability is, in that it now needs to co-mingle the environmental, social and economic pillars of sustainable development. Doing so alongside ensuring public participation in the development process of the SDDS and focusing on systemic problems rather than on symptoms. The OCED in particular has excellent resources available to guide in the structural development of SDSs. We note this as the Government of Canada does not need to invent its own “basic structure” as it can directly benefit from the guidance of international institutions such as the OECD and also from the international experiences of other countries that have completed their own SDS processes. The Government of the United Kingdom has been an early and admirable trail-blazer in the development and design of SDSs at the national, regional and local levels, and so can be considered as one of many possible examples to Canada for a structure to follow in developing an SDS.

The general international framework that seems to be accepted in the basic structure of an SDS (as best articulated by the referenced OECD / United Nations resource book) is that they need have each of a:

¹⁸ OECD - Organisation for Economic Co-operation and Development, and United Nations Development Programme (UNDP). 2002. *Sustainable Development Strategies: A Resource Book*. Paris and New York: Earthscan Publications Ltd. (page 36).

- *Strategic Vision* (or what we would call a *Sustainability Vision*). This directly describes the “long-term aspirations”¹⁹ that the SDS is pursuing as it tries to equally intermingle the social, economic and environmental factors of sustainable development. (We note that the *Federal Sustainable Development Act*, in Section 5, speaks to the need to incorporate each of these three factors in an FSDS, alongside the Section 9 requirement to base the FSDS in the “precautionary principle”).
- *Strategic Objectives* (or what we call *Sustainability Objectives*). These, when “taken together, describe how the vision might be achieved. The principles and values inherent in the vision can be applied to priority issues to establish particular objectives for each issue. Each objective should cover a given issue (problem or opportunity), address the main changes required to make the transition to sustainable development, be expressed in a way that is broad enough to encompass all aspects of the issue and ensure ‘buy-in’ by all relevant stakeholders but also specific enough to allow measurable targets to be defined. *The strategy should cover sufficient objectives to address the main economic, social and environmental concerns of sustainable development, but few enough to be achievable and comprehensible.*”²⁰ [Emphasis added is our own.]
- *Targets* (or what we call *Sustainability Targets*) “for each objective describe specific and measurable activities, accomplishments or thresholds to be achieved by a given date. These form the core of any of any action plan, and serve to focus resources and guide the selection of options for action.”²¹
- *Triggers* (or what we call *Sustainability Triggers*). These “are commitments to take a specified action at a future date.”²²
- *Action plan* (or what we call a *Sustainability Action Plan*). This “is a framework of actions for achieving strategy objectives and targets. It states clearly how each action contributes to one or more given strategy objectives and may suggest a relative priority rating...”²³
- *Institutional plan* (or what we call a *Sustainability Institutional Plan*). This “covers the roles, partnerships and systems required to implement the strategy.”²⁴

In relation to what we see as the above internationally-accepted framework for the development of an SDS, our observations are that the draft FSDS as presented by the Government of Canada:

- Remains in need of inclusion of a clearly-articulated *Sustainability Vision*;
- Provides for environmental objectives (which we take to be the “Four Areas of Focus”) but still requires inclusion of obvious *Sustainability Objectives* (that is, those that address the mutually-reinforcing three-pillars of sustainable development);

¹⁹ Ibid. (page 254)

²⁰ Ibid.

²¹ Ibid.

²² Ibid.

²³ Organisation for Economic Co-operation and Development, and United Nations Development Programme UNDP). 2002. *Sustainable Development Strategies: A Resource Book*. Paris and New York: Earthscan Publications Ltd. (pages 255))

²⁴ Ibid.

- Lists a number of *environmental* targets (many of which unnecessarily duplicate themselves at various points within the section on “Goals, Targets and Implementation Strategies”) and yet these same environmental targets most commonly do not list details on how each target will be “measured” (with more on “measurability” found later below). Yet that said, to be an SDS, the Government’s draft FSDS still needs to include *Sustainability Targets* (again, those that address the mutually-reinforcing three-pillars of sustainable development);
- Still requires inclusion of *Sustainability Triggers*; and
- Can fairly consider the required elements of a *Sustainability Action Plan* and *Sustainability Institutional Plan* to be served by the SDSs that the *Federal Sustainable Development Act* requires of each of 28 federal departments and agencies.

3) *Long-term planning for sustainability requires generational time-lines*

“Progressing towards sustainable development implies that the objectives of increasing economic efficiency and material wealth must take into account social and environmental objectives. Explicit in the concept is a focus on inter-generational equity, implying that future generations should have opportunities similar to those now available....”²⁵

Long-term time horizons are integral to sustainable development. The accepted definition of sustainability, as given in *Our Common Future*, is: “Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.”²⁶ Inherent in this definition are a number of things, including our considering at the very least those human beings who live now (“current”) and those who will inhabit Earth at a time in the “future”. Thus, the time-line for an SDS needs to be in terms of “generations”. Assuming the more common definition of a generation as entailing 20 years, than a pluralised generation would need to take in to account at least a 40 year or more time-frame. The Netherlands has used 30 year time-scales for some of their sustainability-related planning.²⁷ CIELAP is of the view that any time-scales used in a finalised FSDS need to be “generational time-lines” and so take into account “future generations” of human beings.

4) *Measurement tools are essential to an SDS*

“Indicators are needed to illustrate to policy makers and the public the linkages and trade-offs between economic, environmental and social values; to evaluate the longer-term implications of current decisions and behaviours; and to monitor progress towards sustainable development goals by establishing baseline conditions and trends.”²⁸

²⁵ OECD (2005). *Measuring Sustainable Development* [online]. Available from: <http://www.oecd.org/dataoecd/60/41/35407580.pdf> [Accessed: 01 July 2010] (page 2).

²⁶ UN Documents Cooperation Circles (1987). *Report of the World Commission on Environment and Development: Our Common Future* [online]. Available from: <http://www.un-documents.net/wced-ocf.htm> [Accessed: 01 July 2010]. (Section I, Part 1).

²⁷ ²⁷ Organisation for Economic Co-operation and Development, and United Nations Development Programme (UNDP). 2002. *Sustainable Development Strategies: A Resource Book*. Paris and New York: Earthscan Publications Ltd. (pages 256).

²⁸ OECD (2005). *Measuring Sustainable Development* [online]. Available from: <http://www.oecd.org/dataoecd/60/41/35407580.pdf> [Accessed: 01 July 2010] (page 2).

Measurability is essential to sustainability, for demonstrating both progress and the connectivity between its social, economic and environmental pillars. There is that now famed saying that “What gets measured gets done.” In the draft FSDS, the Minister in his message positively notes that “...we are establishing effective measurement, monitoring and reporting in order to track and report on progress to Canadians” (page i). And then in Chapter 4 of the draft FSDS, there is the emphasis on the strategy’s use of the SMART criteria (specific, measurable, achievable, relevant and time-bound) in relation to its targets (page 10). Yet, surprisingly, the high majority of targets listed do not include any criteria that can be used for the purposes of measurement. Unless clear measurement tools are included in the FSDS, it will be a document of good intentions, even high hopes, but of immeasurable and likely weak outcomes.

5) *The need to focus on underlying systemic problems rather than problem symptoms*

The need for sustainable development arises from the reality that many of the original economic structures of human societies have been (mostly unintentionally) designed in ways that often hinder and can even harm Earth’s natural environment; over having been designed in ways to reinforce and even help Earth’s eco-systems. Tinkering with the negative consequences of actions does not, in and of itself, ever solve problems. It simply mitigates problems that will then continue. Thus arises sustainability’s call for human societies to begin their long process toward changing underlying systemic problems, rather than our simply focusing on problem symptoms.

Admittedly, this is an area that can and will be rife with tensions, for it involves competing political and philosophical views that need to be (if they can be...) balanced during the very process of identifying those very problem-areas for sustainability that are in need of change. Then comes that often harder process of actually moving society toward agreed change, as citizen’s expectations and very lives will be directly impacted and altered in the process. This challenges all of us, yet all of this must be undertaken for sustainable development. Fortunately, this process of identifying underlying systemic problems can be done with a relative objectivity and fairness when it is rooted in scientific understanding.

We simply encourage the government to not delay these difficult conversations that Canadians must one day inevitably engage in. There are the usual matters that need be eventually addressed, such as that: as a people, Canadians are recognized as the world’s largest per capita users of energy (an unsustainable pattern of behaviour); Canadians use excessive amounts of water as compared to per capita water usage in other countries; our compatriots in Alberta are doing more to hinder Canada from meeting its Kyoto commitments than any other jurisdiction in Canada; and Canadian health care costs are so clearly unsustainable over the long-term that the systemic challenges in health care must be finally addressed. Each and every one of these matters, amongst many possible others, is a concern for sustainable development and would be appropriate for the government to include in some manner in a finalized FSDS.

Such as it will be, the final FSDS would be more aligned with the thinking about SDSs if it began to seriously consider and address systemic problems.

6) *Public participation is essential to the development of a national SDS*

“There is a high degree of consensus on the need for participation of stakeholders in order to progress toward sustainable development.”²⁹

“Sustainable development planning engages residents, key institutional players, and interest groups, often known as “stakeholders”, in designing and implementing action plans. Planning is carried out collectively among these groups. It is organized so as to represent the desires, values and ideals of the various stakeholders....”³⁰

A key element called for in the development of an SDS is public participation. Public participation can take the passive form of simply inviting written comments from the public, to more engaged and active forms of participation such as more common face-to-face meetings through to more fully-engaged Citizens’ Juries or Constituent Assemblies. In our understanding of sustainability governance, the development of an SDS calls for more active forms of public participation. We would encourage the Government to develop a second draft FSDS that would then also be reviewed during a second round of public participation. This second round process would then intentionally incorporate a more active public consultation process with and for the public.

7) *Review questionable assumptions of the draft FSDS*

Lastly, while not a matter of structure, we offer comment on some of the assumptions – we might even term them as “perceptions” – underlying aspects of the draft FSDS.

In the draft FSDS, there is the statement that “Canada is working constructively with the international community to implement the Copenhagen Accord...” (page 7). And there is also the stated view that “Sometimes Canadians take water for granted, by wasting or misusing it.” (page 7). There is also a stated opinion that “Canadians... have maintained a tradition of conservation and sustainable use of our biological resources” (page 8). Considering: the recent negative international media attention Canada has received for the negotiating position it took at the Copenhagen Conference; the body of scientific and other evidence that suggests Canadians *do* (not only *sometimes*) take water for granted; and that the collapse of the cod fishery on the East Coast of Canada and the collapse of the salmon fishery on the West Coast (among many other examples of Canadians’ bad stewardship of our biodiversity) do not support that we as a people are fine stewards of Earth’s biodiversity; we would respectfully suggest that these assumptions are openly questionable. Thus, we recommend that it would be wise to simply leave statements like these out of the final FSDS, as the evident questionability of their accuracy only serves to weaken what might otherwise be a stronger document.

Final Comments

Thank you again for this opportunity to provide comments on the draft FSDS. We again offer our congratulations to the federal government on the development of this first FSDS for Canada. Yes, this first draft FSDS for Canada was released now nearing 23 years after the United Nations (UN) *World Commission on Environment and Development* popularised the phrase and concept of “sustainable development” through its

²⁹ Organisation for Economic Co-operation and Development, and United Nations Development Programme (UNDP). 2002. *Sustainable Development Strategies: A Resource Book*. Paris and New York: Earthscan Publications Ltd. (pages 177).

³⁰ International Council for Local Environmental Initiatives (ICLEI) (1996). *THE LOCAL AGENDA 21 PLANNING GUIDE: An Introduction to Sustainable Development Planning* [online]. Available from: http://www.idrc.ca/en/ev-9322-201-1-DO_TOPIC.html [Accessed: 21 June 2010]. Ottawa; IDRC. (page 6).

ground-breaking report *Our Common Future* (a report drafted by that now prominent Canadian, Jim MacNeill). And yes, this first draft FSDS also comes almost 18 years since Canada joined with 177 other nations at the Rio de Janeiro *Earth Summit* (the United Nations Conference on Environment and Development) to adopt *Agenda 21*, the self-described “action plan for sustainable development”. Yet we intentionally remind other Canadians that the past is just that. Today, in 2010, Canada has finally joined alongside such diverse countries as the United Kingdom and Mexico to honour the spirit and intent of its UN commitments by developing this first FSDS for our country.

If there are any ways CIELAP can assist the Government of Canada in improving this particular FSDS or of future FSDSs, please do not hesitate to contact us.

Sincerely,



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- Mr. James Bezan, M.P.
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