



Wildlife Conservation Society Canada comments on the Federal Sustainable Development Strategy (FSDS)

July 8, 2022.

Via email: SDO-BDD@ec.gc.ca

Thank you for the opportunity to provide feedback on the draft 2022 to 2026 Federal Sustainable Development Strategy. We are commenting on this draft document in our capacity as scientists from Wildlife Conservation Society (WCS) Canada, established in 2004 as a Canadian non-government organization. WCS Canada generates knowledge through research and tools for conservation of species and ecosystems and the services they support in Canada. We provide this information towards the development of policies and governance systems that support conservation, sustainable use of biological resources, and management of cumulative effects.

Here we offer high-level comments in support of the strong role that can and should be played by the federal government in promoting truly sustainable development in Canada. In light of the fact that the Federal Sustainable Development Act compels the federal government to establish environmental goals, targets and set implementation strategies for each target, we are encouraged by the focus of the document on all 17 SDGs, rather than the subset of “environmentally-focused” SDGs that were covered in the 2019-2021 strategy.

However, while we appreciate that the draft strategy seeks to present a ‘whole-of-government’ “view” or “picture” by bringing all Sustainable Development Goals (SDGs) together in one place (although still limited to just the “environmental aspects” of each), we emphasize that implementation of a truly integrated approach requires much more than coordinated reporting. Achieving the milestones identified in the draft would certainly advance sustainability in Canada and support Canada’s global commitments to climate and nature action, but the document contains no evaluation of the extent to which the targets in the previous strategy (2019-2022) were achieved (or not), and what changes will be required to shift from the status quo to achieving sustainability in Canada. The draft strategy is largely silent on how these various goals will truly be implemented to “support a unified approach to sustainable development within the Government of Canada”, i.e., beyond Environment and Climate Change Canada. Moreover, the 17 sections are for the most part considered separately from one another, and only chapter 10 discusses the relationship between this SDG and others (see schematic in Attachment 1). It is also not sufficiently understandable how this one departmental strategy fits within Canada’s 2030 Agenda National Strategy.

We are encouraged by the emphasis on meaningful participation of Indigenous peoples, promotion of women’s participation in the environmental sector, enhanced commitment to environmental justice and addressing inequalities, the proposed designation of ecological corridors, and ambitious goals in increasing the amount of protected and conserved areas in Canada.

We are, however concerned that this strategy essentially represents a business-as-usual approach rather than any push to use SDGs as an opportunity for genuine transformative change. The SDGs have been critical in building awareness about sustainability, but profound actions have been rare¹. The draft FSDS is an opportunity to bridge the knowing-doing gap in sustainable development and for Canada to be a global leader in showcasing a society that meets the aspirations of the SDGs. But it is presently unclear on how the federal government as a whole will achieve sustainability through myriad (and sometimes conflicting) mandates.

We offer select comments on sections of the draft that focus on biodiversity and climate for your consideration (Attachment 2). We note that we regard at least four of the SDGs (3, 8 9, 12) are incompletely addressed with respect to environmental aspects for which Canada can and should take responsibility.

In closing, we continue to have the same concerns voiced by Standing Committee on Environment and Sustainable Development (ENVI)² in a 2016 report that the federal government's approach to sustainable development needs to be made "a fundamental high-level commitment from the cornerstone, central responsibility of government." We echo the recommendation made in this report to "enable a whole-of-government approach and comprehensive engagement of all central government agencies in the development and implementation of the Federal Sustainable Development Strategy and in championing federal sustainable development government-wide".

Sincerely,



President and Senior Scientist
Wildlife Conservation Society Canada

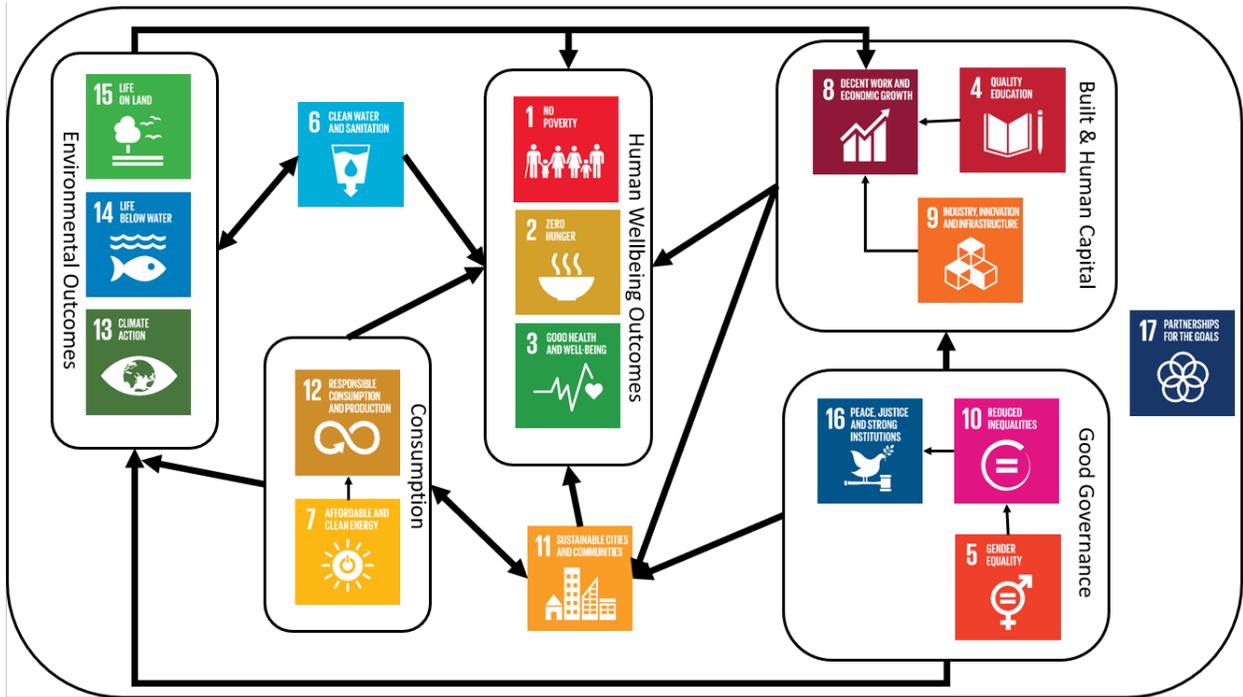


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¹ Biermann, F., Hickmann, T., Sénit, CA. *et al.* Scientific evidence on the political impact of the Sustainable Development Goals. *Nat Sustain* (2022). <https://doi.org/10.1038/s41893-022-00909-5>

² ENVI (Standing Committee on Environment and Sustainable Development). 2016. Federal sustainability for future generations – a report following an assessment of the federal sustainable development act. ENVI Committee Report. June 2016, 42nd Parliament, 1st Session [online]: Available from ourcommons.ca/DocumentViewer/en/42-1/ENVI/report-2/page-5

Attachment 1: Demonstrating the linkages between SDGs (copyright WCS)



Attachment 2: Specific comments

Chapter	Section/page	WCS Canada comment
1 Support Canadians' Preparedness for natural disasters and emergencies	Implementation strategy/ 26	The entire section is missing any discussion of the critical role played by natural ecosystems in supporting preparedness for natural disasters and emergencies. The implementation strategy section should include an item about working with P/T on strategies to maintain integrity of ecosystems, e.g., forests, wetlands, floodplains, peatlands, and halting the conversion of these areas to enhance natural resilience of communities.
2 Support a healthier and more sustainable food system	Implementation strategy/ 32	<p>Conversion of forests, prairies wetlands to agriculture is one of the key drivers of habitat loss and wildlife decline in Canada and contributes to greenhouse gas emissions. Managing these on-going conversions must be a key implementation strategy in this section for Canada to achieve the biodiversity conservation goal of 'halt and reverse'. We recommend that halting and reversing this conversion as measured through land-use change and improving wildlife habitat capacity on agricultural land be integrated into the implementation strategy and milestones.</p> <p>A specific target to transform agriculture to carbon-positive would also support food security and agricultural sustainability and support Canada's climate targets.</p>
3 Protect Canadians from air Pollution and harmful substances	Implementation strategy/ 42	<p>SDG3 is about good health and well-being. While pollution is certainly part of it, it is not complete. We strongly recommend that the document include a strong statement on a 'One Health' approach. A One Health approach has already been identified in the 'Statement on behalf of 48 Parties to be delivered at the opening session of the 4th OEWG', which was signed by Canada.</p> <p>This section must have a definition of pollution that is inclusive of all sources of pollution, including noise and light pollution, which are becoming increasingly important. Target 7 of the emerging Post-2020 Global Biodiversity Framework is inclusive of all sources. The implementation strategy and milestones in Canada's draft strategy currently include air and chemical pollution only. One example of a missing element is a strategy to manage and mitigate noise levels in all three oceans.</p>
4 Publicize research, knowledge and Data for sustainable development	Implementation strategy/ 49	<p>It is high time that Canada's Ecosystem Status and Trends Reporting (2010) be updated to support the goal to publicize research, knowledge and data for sustainable development.</p> <p>Biodiversity data in particular is terribly fragmented across Canada. Include a commitment to establish a National Biodiversity Information Inventory via new stand-alone legislation that would be loosely modelled on the National Pollutant Release Inventory established under the Canadian Environment Protection Act. The goal of this inventory would be to dramatically expand public and governmental trends in biodiversity, to drive science-based decision making and to support ongoing biodiversity research across the country.</p>

Chapter	Section/page	WCS Canada comment
6 Ensure clean and safe water for all Canadians	Implementation strategy/ 66	We appreciate the reference to water as natural heritage and support the creation of a new Canada Water Agency. See Chapter 15 comments on Key Biodiversity Areas (KBA). We encourage KBAs for freshwater ecosystems to support freshwater protection and restoration actions and a Freshwater Action Plan.
7 Increase Canadians' access to clean energy	The environmental perspective/ 69	This section does not explicitly recognize that generating the required technologies and infrastructure for renewable energy has significant potential implications for land use change particularly through cumulative impacts. For example, renewable and clean energy sources should not degrade Key Biodiversity Areas, high integrity forests and peatlands. Clean energy development must also include carbon accounting from land use change to fully calculate climate impacts and benefits. Without explicit attention to this in the implementation strategy and milestones, pursuit of this SDG can hardly be considered a whole-of-government approach.
8 Encourage inclusive and sustainable economic growth in Canada	The environmental perspective/ 79	Through its focus on promotion of clean technology employment sector, this section is incomplete. One glaring omission that is still under ECCC's mandate is impact assessment processes that serve to avoid and mitigate damage to natural systems in the context of economic development, including developing and implementing guidelines and regulations that require no net loss of biodiversity and net zero climate emissions for projects that will have an impact on the environment.
9 Foster innovation and green infrastructure in Canada	The environmental perspective/ 87	The focus in this strategy on green infrastructure is insufficient for this SDG, which concerns infrastructure in general. Therefore, we emphasize the need for more explicit recognition that infrastructure development, such as transportation, mining, and hydroelectric power frequently contribute to habitat degradation, ecological fragmentation, and loss of natural resources. This strategy should, therefore, be clear about how infrastructure development writ large will be made sustainable in Canada through implementation of impact assessment, for example.
10 Take action on environmental Inequalities and collaborate on environmental and natural resource management	Implementation strategy/ 105	While we recognize that Bill C-230 - An Act respecting the development of a national strategy to redress environmental racism – is a private member's bill, there are many elements of within it that deserve attention in implementation, whether or not the bill passes, which should be included in this strategy.

Chapter	Section/page	WCS Canada comment
12 Reduce waste and transition to zero-emission vehicles	Implementation strategy/ 123	<p>This SDG pertains to responsible consumption and production, which has environmental implications well beyond waste reduction and transition to zero-emission vehicles, although these are of course both important. The sustainable use of natural resources depends on “balancing” consumption with the ecological limits of natural resource production, which requires true mainstreaming of climate and biodiversity considerations into natural resource development and land use planning.</p> <p>The implementation section should commit to the elimination of biodiversity-harmful and fossil fuel subsidies that drive unsustainable production.</p> <p>This section of the strategy should also be clear that the transition to zero-emission vehicles will drive an increase in the production of many metals, which will create new threats from land use change and pollution that will require increasing attention.</p>
13 Take action on climate change and its impacts	Targets and indicators/ 131	<p>We appreciate the recognition of essential linkages between biodiversity and climate change in this section. Although we recognize that nature-based climate solutions are embedded within a number of the committed actions, we suggest strongly Canada commit to an integrated framework for peatland protection in Canada, in recognition of Canada’s disproportionate global responsibility for these high-carbon ecosystems and their essential value as a carbon service, the loss and disturbance of which could lead to outsized increases in atmospheric greenhouse gas concentrations. Insufficient attention to this fact will work against the efforts Canada is leading to reduce Canada’s carbon emissions.</p>
14 Conserve and protect Canada’s oceans	Implementation strategy/ 144	<p>We recommend that the implementation strategy include explicit attention to arctic oceans and coastlines, which are under climate change (and associated shipping), but where there are still significant opportunities to proactively address negative impacts.</p>
15 Protect and recover species, Conserve Canadian biodiversity	Chapter name/ 149	<p>Suggest that both species and biodiversity should be combined, and the name changed to ‘halt and reverse the loss of biodiversity’. This would ensure consistency with the mandate letter to ‘halt and reverse the loss of nature by 2030’ and in keeping with the mission of the emerging post-2020 Global Biodiversity Framework (GBF).</p>
15 Protect and recover species, Conserve Canadian biodiversity	Post-2020 biodiversity framework negotiations/ 153	<p>Respecting the box that mentions the GBF negotiations, it should also be mentioned that the COP16 where the GBF will be finalized will take place in Montreal in December 2022.</p>

Chapter	Section/page	WCS Canada comment
15 Protect and recover species, Conserve Canadian biodiversity	Targets and indicators/ 156	<p>Canada needs a target focused on the conservation and restoration of old-growth forests. This would support implementation of the BC Old Growth Nature Fund as presented in Budget 2022 and advance these protections to other forest ecosystems.</p> <p>The timber supply indicator is incomplete as an indicator for this SDG. While Canada excels at modeling wood supply, there is inadequate attention paid to other dimensions of forest sustainability related to climate and biodiversity. We strongly recommend against this indicator being mentioned in the context of SDG 15.</p>
15 Protect and recover species, Conserve Canadian biodiversity	Implementation strategy/ 158	We strongly encourage the addition of an action to support the completion of the identification of Key Biodiversity Areas across Canada and actions to promote their conservation and stewardship. This will help to inform the strategic and efficient placement of new protected and conserved areas and ecological corridors, land use planning, no net loss biodiversity strategies within the context of impact assessment, and support species protection and recovery.
15 Protect and recover species, Conserve Canadian biodiversity	Implementation strategy/ 158	We encourage the adoption of the principle of ‘significant net gain’ in biodiversity offsets. In most cases, the objective of no net loss results in the loss of habitat area, quality, and function. A review of Canada's no net loss policy for fish habitat in 2006 concluded that 63 per cent of projects resulted in loss of habitat productivity. Similar results are documented from compensatory mitigation under the U.S. Clean Water Act to provide no net loss of wetlands and from no net loss policies in France . The lag time between loss and restoration can also result in prolonged and permanent biodiversity losses.
15 Protect and recover species, Conserve Canadian biodiversity	Short-term milestones/ 156	We encourage a more ambitious target than three action plans by 2022. We suggest that at least one action plan (outside of National Parks) be developed in each province and territory.