

Federal Sustainable Development Strategy

Sustainable Development Advisory Council

Kali Taylor (Alberta)

Introduction

I am honoured to be a member of the Sustainable Development Advisory Council and to represent my home province of Alberta in providing comments on the 2016-2019 Federal Sustainable Development Strategy. I commend the government for their modern, transparent and participatory process for gathering feedback on this important document.

Sustainable development is an evolving concept. First coined in the 1987 Brundtland Commission report, as “development that meets the needs of the present without compromising the ability of future generations to meet their own needs,” the term has changed in focus as international priorities have shifted. What started as a primarily environmentally focused paradigm has transformed to a holistic approach built upon the pillars of economic, environmental and social development. With the introduction of the UN Sustainable Development Goals in 2015, the concept has become yet more inclusive, now defined by the 5 Ps – people, planet, prosperity, peace and partnership. In Canada, the FSDS may be owned by Environment Canada but it is clear that broad participation across ministries and sectors of society will be required to deliver on this integrated view of sustainable development. Hence, it is fitting then, that the Government of Canada is refreshing the FSDS in the wake of these developments and new thinking.

As the old adage goes “planning is essential, plans are useless” and this is the philosophy I have taken in compiling my comments – focusing on the structure, thought-processes, and accountability mechanisms of the strategy, rather than specific tactical elements. Thank you for the opportunity to play a part in shaping this crucially important strategy for a strong Canada today and well into the future.

Overall Recommendations

I have compiled feedback on a number of key, overarching issues in this section. In addition, I have included Alberta specific considerations and page specific comments in the sections that follow. In preparing these recommendations I consulted with the Fellows of the Energy Futures Lab who represent a diverse set of viewpoints on the future of Alberta. I also consulted colleagues at Sustainable Prosperity, the International Institute for Sustainable Development, and several other subject matter experts.

Integrated Thinking and Policy Coherence

While I am thrilled that the FSDS has made a conscience effort to integrate the UN Sustainable Development Goals into the overall strategy, I am concerned about how the integration has been done and what this may mean for the SDG implementation in Canada at a broader level.

The SDGs very purposely integrate the pillars of sustainable development into one cohesive results framework to paint a holistic picture of what sustainable development can look like at a global level. They purposely require collaboration and cooperation across government departments and sectors of society. They are not meant to be treated as a “menu” that governments can pick and choose from. The UN recognizes that prioritization will be necessary and that countries will need to translate the global goals to national contexts for successful delivery. In our case, however, it is unclear who within the Canadian government is looking at the integration between the multiple elements of sustainable development and the overall ownership of the SDGs. Environment Canada and so it should as 86 of the SDG targets concern environmental sustainability, including at least one in each of the 17 goals. EC has made it clear that other departments will be integral to the delivery of certain targets but the bigger picture question “who is looking at the SDGs from the macro level?” has not been answered in this strategy. This may be a problem larger than the strategy itself but it is my hope that the FSDS will catalyze this discussion within the Federal government.

In reading the strategy, it is clear that the FSDS is meant to focus on the environmental dimension of sustainable development but there is misleading language about this throughout the strategy (e.g. the question “*What can the federal government do to ensure a more sustainable future?*”). I suggest that the strategy be clearer about its focus while still recognizing that sustainable development is a broader concept that includes social and economic dimensions.

Policy coherence is crucial to the SDGs— that, by design, the SDGs highlight linkages across different elements of sustainable development and should be approached as such. Policy coherence is not about overcoming sectoral policies, but about complementing them with an inter-sectoral dimension. In practical terms, this means things like providing reliable electricity to those who do not have it cannot be done so by carbon intensive fuels because while it may solve one dimension (energy access) it exacerbates another (climate change). The FSDS has attempted to bring other departments into the strategy but there needs to be more clarity about how this cross-departmental collaboration will be carried out and how accountability will be assured so that the integrated elements of sustainable development are addressed (see following section on accountability and transparency).

Narratives and Theoretical Architecture

In addition to taking an integrated view of sustainable development, the FSDS needs to strengthen the consistency of its narratives throughout the document.

In my consultations with peers on the FSDS, one member of Alberta's Energy Future Lab raised the issue of the theoretical framing of the strategy. While it may seem like a purely academic exercise to define how the government view sustainable development it is actually a fundamentally important concept as it ensures consistency throughout. Applying a consistent frame allows us to answer questions like "do we value X above Y?" and "how do we determine national priorities?" I have included Michael Benson's personal submission as Appendix A to this document as it more completely explains the theoretical models for sustainable development that the government may consider. Regardless of which frame is chosen, I recommend that EC define this internally so it can remain consistent in implementation.

In addition to the theoretical frame, there are two other narratives that should be clarified in the strategy:

- Competitiveness – while innovation and infrastructure are highlighted as priorities, the narrative around how leading in these areas will contribute to Canada's competitiveness in a changing global economy that increasingly values environmental leadership is missing. The message that sustainable development is good for the economy should be made stronger.
- Time Horizons – short term vs. long term – with the strategy being focused on three year cycles it would be prudent to explain that sustainable development is a long-term vision and that this strategy is just one step in moving toward it.

Implementation Detail

EC has clearly highlighted its areas of focus in the FSDS, but the associated implementation strategies are too generic and broad to be effective. They do not provide enough information about how the government actually plans to deliver the sustainable vision it has painted. It is understandable that the government might exclude step-by-step plans in a strategy of this level to ensure policy development and implementation remain iterative and responsive, however there are some key pieces of information that could be added to give Canadians a better sense of the government's plans for action.

Priority Actions

The generic implementation strategies give a sense of where the government feels action is required to meet targets, but descriptions of policy interventions and/or actions the government will take are inconsistent. By adding 1-3 priority action areas under each implementation strategy the government can show current thinking while

not marrying itself to interventions that may change as more information becomes available.

- For example, in the preamble on climate change some priority policy actions are noted but this is not the case for some of the other sections. By moving (or adding where they are missing) these policies into the implementation strategies it will be clearer to Canadians what each implementation strategy is meant to achieve.

SDG Targets

In addition to clearer policy actions, it could also be clearer which SDG targets the FSDS is addressing. With 169 targets included in the SDGs, it is important the government be clearer about what they are trying to address. Currently, the SDGs are listed in every section but there is no explanation of what specifically is being addressed with the strategy. I also recommend that the once the targets are added, the associated indicators (as adopted by the UN Statistical Agency) be included in the overall FSDS measurement and indicators plan (see following section on indicators and measurement for more on this).

MEAs

Throughout the document, there is some coverage of the Multilateral Environmental Agreements (MEAs) that Canada is a party to (for example, the Convention on Biological Diversity and the London Protocol) but more detail (perhaps an Appendix) could be added to show Canada's international obligations and commitments and how EC plans on upholding them.

Language

The use of the term "goals" in this document is confusing for two reasons:

- 1) the strategy includes reference to both FSDS goals and the Sustainable Development Goals so a person unfamiliar with these terms may think they are interchangeable;
- 2) the "goals" are not written as goals in the FSDS

I suggest making structural changes to the document to be more accurate with the term goal. The five "goals" should be called "focus areas" and the preamble that follows them should become the goal. For example:

- Strategic Focus Area: Climate Change
Goal: In order to mitigate the effects of climate change, reduce GHG emissions levels and build resilience to climate change.

In addition, the goals as stated are not SMART – specific, measurable, actionable, realistic and time-bound. As Smart Prosperity explained in their feedback submission, as currently presented, it is impossible to determine what specific outcomes the

government is pursuing in these areas, by when, and how they will be measured. It is also not possible to do serious benchmarking against the actions, achievements, and aspirations of other leading nations on the basis of these targets. Goals should be rewritten to address these issues.

Finally, any terms that may not be inherently understood by the public and/or have varying definitions should be defined within the strategy (for example, resilience).

Indicators and Measurement

The indicators within the FSDS need substantial work. They are inconsistently listed and often not directly relevant to achieving and measuring the targets they are associated with. There are large bodies of literature around indicators and measurement by international institutions like the World Bank, OECD and United Nations that are meant to be adapted to national contexts and ensure best practice. It is crucial that indicators are used to benchmark and measure performance in ways that are informative, clear, and appropriate.

In their submission, Sustainable Prosperity suggested that stronger indicators could be implemented by expanding beyond science and program-based indicators (with which the FSDS is very well-served by the Canadian Environmental Sustainability Indicators program (CESI)) to also include more integrated environment-economy indicators of progress, either as an addition to CESI or as a separate suite of dedicated FSDS indicators. The government may want to liaise with organizations like Sustainable Prosperity and the International Institute for Sustainable Development with existing competency in this area to get a more robust set of indicators.

It is also crucial that the FSDS incorporate the global SDG indicators (as agreed upon by the UN statistical agency) into the strategy. This will ensure consistency with the rest of the international community under the 2030 Agenda.

Finally, for transparency (see next section for further detail) the Canadian public should be able to follow the progress of the FSDS via indicators. Baseline trends and/or clear starting points can indicate where Canada currently stands. This paired with goals for 2019 will allow for a critical and transparent review of progress.

Accountability and Transparency

As stated in my first recommendation, integration and cross-departmental collaboration is of the utmost important for effective implementation of the FSDS. The same can be said of partnerships with the private sector and civil society as well as coordination with provinces and communities. Sustainable development is a concept that requires the buy-in of all facets of society; that also makes it more complex to implement.

The strategy should include plans for how EC plans to work internally with other government departments and levels of government to ensure delivery capacity. It should also include plans for how it will externally report progress and lessons learned from the strategy. Of particular interest would be dashboards of indicators that clearly show progress or shortcomings that are freely and openly available to the public.

Indigenous People and Traditional Knowledge

While it is not my area of expertise, it seems that understanding and integrating the traditional knowledge of indigenous people could be more explicitly noted as an implementation strategy in the FSDS. I recommend [this report](#) by the United Nations Department of Environmental Law and Conventions report on Community Practices as a first step in thinking through how traditional knowledge can inform and shape environmental policy.

The FSDS also ought to underscore the importance of issues crucial to reconciliation that are often tied to environmental management and natural resource development (for example free, prior, and informed consent). In articulating these principles, I recommend reference to the 2015 Final Report of the Truth and Reconciliation Commission of Canada, which calls upon Canada to adopt the United Nations Declaration on the Rights of Indigenous Peoples as a [reconciliation framework](#).

Public Literacy, Buy In, and Excitement

One element that seems to be missing all together is public literacy, understanding and buy-in as implementation strategies. Connecting people to nature is mentioned but this has a slightly different connotation to ensuring that Canadians have a grasp of the concept of sustainable development and an impetus for action. Sustainable development is ultimately a human issue so engaging the public in the topic is crucial.

Some of the implementation strategies within the FSDS focus on voluntary actions. With the known complexities of human behaviour it is very likely that these strategies will only provoke the early adopters and those already educated and motivated to change. Part of the FSDS should include trying to reach audiences more broadly and paint a picture of what a sustainable future can look like for them and for Canada.

Many of the people I consulted through the Energy Futures Lab mentioned that while the strategy is comprehensive it does come across as slightly inaccessible or top-down. It would be prudent of the federal government to think about bold pieces of their vision that could be bolstered with this strategy and used to rally the support of the public at large. This could also be paired with “calls to action” or specific opportunities for citizens to participate in the implementation of the strategy to enhance ownership and support.

Alberta-Specific Considerations

Alberta faces a complex set of circumstances when it comes to sustainable development and the changing global dynamics in social, economic and environmental domains. It is no secret that Alberta's prosperity over the last two-three decades has largely been tied to a booming fossil fuel industry. There is a great deal of uncertainty in the province as oil and gas prices remain depressed and action on climate change has been institutionalized at the international level. In the past year, approximately 78,000 jobs have been lost and unemployment has soared to 7.8%. To summarize, there is a great deal of fear and uncertainty amongst Albertans about their collective future.

However, there is also a great deal of resilience, optimism and will to prove innovative capacity in the province. Even in uncertain times, I land on the side of optimism and believe that just as Alberta carved a space for itself in a fossil-based economy it can do the same in a low-carbon one. The provincial government is taking bold steps on climate and energy files that have had mixed reviews across the province. Even with strong environmental leadership, there is a noticeable sentiment skewed towards the economic pillar of sustainable development in these vulnerable times. People want to be assured that their wages and job security are being considered in the ongoing transition.

Given these conditions, there are several key considerations that pertain to the Federal Sustainable Development Strategy when it comes to Alberta:

- **National and Provincial Cooperation** – the FSDS is a national vision but many of the issues it addresses are under provincial jurisdictional authority. The success of this strategy will require the federal government to foster cooperation and buy-in across provinces with diverse interests. This is an issue that rings particularly true in Alberta where market access to tide water for international trade has been a persistent issue in the past and a point of contention with other Canadian provinces. It is my hope that by creating a vision that all provinces are onboard with, the FSDS can be a tool for strengthening relationships between provinces.
- **Just Transition** – the large number of lost jobs has led to the question of a “just transition” for Alberta. Certain academic institutions (ex. NAIT, Lakeland College) and the innovative worker's organization Iron & Earth are promoting the retooling of highly skilled oil and gas employees for the design, integration, management, and deployment of renewable energy and energy efficiency. It is critical that Canada not miss the opportunity to utilize the skills and experience of people already working in oil and gas to maximum effect in the transition to renewable energy. With their current skills, many individuals could transition with minimal retraining, meeting the needs of industry and reducing unemployment in a timely manner. The federal government should provide targeted funding for agencies, postsecondary institutions and incubators that are

- specifically providing retraining and business development support for the transition to renewable energy as well as new, innovative businesses in these areas (see next bullet).
- **Value Addition** – there is growing recognition and acceptance that a commodity-based economy is a vulnerable economy. Policies that encourage diversification and value-addition activities in resource industries are needed. In addition, Alberta will require investment and support to properly use the vast resources it has at its disposal and activate innovation – not just in technology but also in business models, processes, and thinking more broadly.
 - **Consistency and Clear Signals** – with volatility becoming the norm in global markets, Alberta-based companies are looking for consistent and clear signals from governments so that they are clear about their operating conditions well into the future.
 - **Quality of Life** – the idea of high quality of life is an emotionally charged issue in Alberta as citizens of the province feel their own livelihoods are being threatened. Sustainable development should be positioned as the ultimate key to a long term, stable quality of life in order to resonate with Albertans. Due to a decades-long tension between environmental and economic interests, it will take consistent efforts and reframing for the majority to buy into this idea.
 - **Natural Disaster and Risk Management** – Alberta has experienced a large number of extreme weather events in the last three years including the Slave Lake and Fort McMurray fires and the Calgary floods. Forest management, disaster prevention and climate change adaptation support are particularly relevant in the Albertan context.

Page-Specific Comments

Page 8, callout box - I am concerned about the following sentence “the government will launch a review of Canada’s environmental assessment processes to regain public trust and get resources to market “ – in the past when statements like this are made it has secretly meant “drill baby drill.” I am not opposed to development and ensuring that Canadian has products for export but what those products are, how the benefits derived are used and how they fit within broader sustainable development is extremely important. Pathways that create dependency on dying industries are concerning; pathways that are utilizing current core competencies to build bridges to the industries of the future are completely acceptable.

Page 12, Target 1.1 - There is no acknowledgement that the climate targets should be ratcheted over time. Our 17%/30% below 2005 levels is ambitious for the country but there is still an emissions gap globally and Canada will need to do its part to close that gap. I would like to see it go as far as net carbon neutral by 2050, which is briefly mentioned in the Paris agreement but I recognize that is a challenge politically.

Page 12 - I like the Climate Policies at the federal level but they lack in detail – when will fossil fuel subsidies be removed? What does “unsuccessful exploration” mean? What is a Low Carbon Economy Trust and what kind of initiatives does it fund? How much will the government put toward Climate Finance? This comes back to my more general comments about choosing 1-3 priority actions and providing adequate detail.

Page 12 - The climate implementation strategy around voluntary approaches, while well meaning, seems pointless if carbon pricing is not an explicit strategy – prices change people’s behaviour. Particularly when command and control policies are explicitly mentioned (but fiscal policies are not).

Page 14 - Under resilience, it seems like there should be some link to the insurance industry and ensuring people are properly covered in a changing world, perhaps through incentives – maybe this thinking is covered under helping communities have comprehensive plans.

Page 15, Target 1.3 - It is concerning there are no indicators for energy – this is a relatively well-known area of indicators vs. some other green economy areas. Is this something that is coming from NRCan?

Page 15 - The energy target seems more focused on electricity than other areas of the energy sector. There is some mention of changing broader systems but it could be stronger. I would also like it to address supply and demand sides specifically.

Page 15 - Investing in clean energy technologies is such a broad statement – I feel this could be more strategic; technologies that Canada can have a competitive advantage in, technologies that take advantage of our human and natural capital resources, etc. See my comments in the narratives section about global competitiveness.

Page 16, Target 1.4 - The internal federal government GHG reduction targets are weak. Governments are often able to act faster than the economy as a whole. Through procurement strategies and offsets they can also stimulate broader change. I would look to the Sustainable UN (SUN) initiative for a test case.

Page 19 - Under Innovation “promoting innovation in natural resource sectors” doesn’t go far enough for me. I worry that Canada is always going to be a natural resource economy (raw) instead of one that actively encourages value-add activities and knowledge products as well. Canada is notoriously bad at resource productivity (and labour productivity) – this needs to be addressed through innovation. Specifically, I would like to see the words resource efficiency added to this section.

Page 19 - Resource sectors are heavily represented under Goal 2, which we support, but other sectors are conspicuous by their absence, including major EITE sectors such as cement or chemicals, as well as transportation, manufacturing, and buildings.

Page 20, Target 2.1 - “Strategic investment” must also mean targeted and focused on building technology/innovation ecosystems. Canada often sprinkles dollars around and fails to create core competencies. If you contrast this with the DOE in the USA, it is a dramatically different approach and we suffer because of it. Innovation is also about creating business conditions in Canada that are suitable to keeping businesses based in the country. Export is mentioned but part of export assumes the companies remain based here and there are frankly countries with more aggressive strategies for attracting and keeping innovative companies which can be a bit of a brain drain for Canada.

Page 20 - All the strategies under clean technology investment appear to be focused on GHGs – what about water? Waste?

Page 21, Target 2.2 - Government procurement can also be a strategy for ensuring clean technologies are demonstrated at a commercial scale – “Buy Canadian first” is certainly something the government could consider in its internal operations side.

Page 28, Target 2.8 - The indicators for mining seem quite weak. The International Resource Panel (IRP) or an associated UN body likely has a more robust set of indicators for this area.

Page 33, Target 3.3 - Is the national target for protected conservation just the government or does it include conservation with other organizations like the Nature Conservancy? (it mentions “supporting the conservation efforts of others” but not clear if that applies to the overall target) If it is a total target how much of that is the government conserving? I feel that should be broken down further. How does this target compare to other nations?

Page 44, Target 4.6 – Certainly many Alberta based energy companies would take up issue with a complete moratorium on the North Coast of British Columbia. I suggest that policies as extreme as moratoriums be widely consulted on with diverse stakeholders before moving ahead.

Page 52, Target 5.3 - It’s great that on-reserve water systems were addressed for First Nations but I am a bit surprised that energy wasn’t handled in the same way, i.e. a specific target around energy for reserve communities.