



## Réseau Canadian Environmental Network (RCEN) Sustainable Development Goals (SDG) Caucus Response to Review of Federal Sustainable Development Strategy (FSDS)

### Introduction

The RCEN's SDG Caucus welcomes this opportunity to provide input into the Government of Canada's Federal Sustainable Development Strategy (FSDS). The SDG Caucus was established in 2021 to create a renewed dialogue among our communities about good practices for achieving the SDGs by 2030. The Caucus will work toward improving knowledge respecting the SDGs, creating space for dialogue, and fostering activism at multiple levels of governance. For more about the SDG Caucus, please visit <https://www.rcen.ca/sdgcaucus>.

Having previously submitted a petition to Canada's Auditor General concerning the [Status of Implementation of Canada's Sustainable Development Goals](#), we are heartened by the Government's response and the willingness to engage with environmental groups on issues of importance for the country. As Canada moves forward from a global health emergency, there is a need to restart a whole-of-society effort to respect, protect, and sustain ecological systems and the well-being of all Canadians, who live, work and play in the natural world of which we are all a part. Accordingly, the SDG Caucus welcomes the focus on the environmental dimensions of the UN's 2030 Agenda on the Sustainable Development Goals.

### Executive Summary

In sum, SDG Caucus's suggestions below are focused on the following:

#### *Energy and Climate Change*

- Support for a Just Transition away from fossil fuels, support for deep energy conservation efforts, and a corresponding halt to the expansion of fossil fuels development
- An appropriate re-allocation of governmental resources towards clean, renewable, and recyclable methods of production and consumption, including renewable and clean energy SDG#7, in line with SDG#12
- Improved intergovernmental coordination with provinces, civil society, the private sector, and municipalities to achieve ambitious reductions in carbon emissions

#### *Nature and Biodiversity*

- Recognition that Canadians are part of nature and should value it for its own merit which enables sustainably and respectfully harvesting its riches and enjoying the eco-services that it provides, including maximum effort to integrate a post 2020 global biodiversity framework into the FSDS
- Expansion of legislative frameworks and resource allocation to effectively halt the decline of species and restore and regenerate nature where possible



## *Environment, Social and Economic Linkages*

- A recognition and increased emphasis on SDG ‘enablers’ which support progress on the Goals: intergenerational ethics, civil society strength, human and nature rights, Indigenous and traditional knowledge, and elimination of all forms of environmental racism.

### Questions posed by Canada in this Review

Please see our answers to the questions posed below.

- Given the climate and ecological crises facing Canada and the world today, does the structure of the draft 2022 to 2026 strategy—highlighting the environmental aspects of the 17 SDGs, including its more social and economic goals—resonate with you? How would you change it?

### Biodiversity

We urge the federal government to maximize ambition in addressing the biodiversity crisis. Biodiversity is a cross-cutting issue which underpins most if not all of the Global Goals. It is our belief that our federal strategy must also require and consider within the strategy the needs of nature for its own sake. It is time to overhaul and update the current [Biodiversity Strategy](#) to a framework Biodiversity Act. A growing number of environmental groups are calling on the federal government to adopt a biodiversity law to better ensure accountability in setting and achieving biodiversity-related targets and goals. Because time is of the essence, development of such a law should occur alongside target-setting and planning, in a similar sequencing of Canada's climate planning and adoption of an accountability law.

One very important emerging issue in biodiversity protection is deep seabed mining. Oceans represent the largest habitat for life on the planet and the least known and understood. Deep seabed mining has unpredictable consequences for biodiversity and life in general. It's crucial to establish a robust regulatory framework, whether at the national or international level, before allowing any operation ([A Rising Environmental Challenge Report](#)). Even more important, the Government of Canada should prioritize solutions that are less resource intensive, require less materials for production and can prevent the need for extractive practices in the first place.

### Climate Change

Without urgent action, Canada will experience climate change twice as fast as other parts of the world which implies a far faster impact on Canadian ecosystems and biodiversity. Yet Canada has missed every climate target we've ever set. According to the SDG Index, Canada's progress on SDG#13 is stagnating, and major challenges remain if Canada is to meet even its modest Paris target to reduce emissions by 40-45% below 2005 levels by 2030, and to reach net-zero emissions by 2050 ([2021 Progress Report](#)). [Climate Action Network](#) comments that Canada's response to the climate crisis remains inadequate and incremental. We agree.

The [Climate Action Tracker](#) rates Canada's pathway to meeting its NDC 'highly insufficient' with an anticipated outcome closer to a 4 degree C world. The recent announcement of further financial guarantees for the Trans Mountain Pipeline expansion project, as well as supports for new oil and gas development, run counter to the findings of the International Energy Agency in 2021, that the world



already has sufficient oil and gas supply and no new field development is needed (IEA, 2021). Fossil fuel subsidies are also in tension with Goal #7, to reach 100% of Canadian electricity from renewable and non-emitting sources by 2030, and run counter to efforts to achieve environmental justice for Indigenous peoples whose lands are directly affected by fossil fuel expansion. The government should follow through on its 2021 announcement to establish an oil and gas emissions cap by making the cap ambitious and binding.

Finally, biodiversity protection and reduction of emissions are mutually reinforcing. The IPCC 6th Assessment Report states that “it is likely that the proportion of all terrestrial and freshwater species at very high risk of extinction “will reach 9% (maximum 14%) at 1.5C. This rises to 10% (18%) at 2C and 12% (29%) at 3C ([Carbon Brief](#)).” Climate action and species protection should be pursued in tandem as much as possible.

- Do the goals, targets and actions highlighted in the draft strategy cover the key sustainable development issues that the federal government should be focusing on?

Some of the targets, like the goal to conserve 25% of Canada’s land and inland waters by 2025, working toward 30% by 2030, are less ambitious than what is needed. In addition, protection of biodiversity should go beyond the establishment of protected and conserved areas to include connected biodiversity corridors and targeted interventions to assemble large mammal and keystone animal species whose survival is integral to the health of ecosystems as a whole.

In the case of disaster risk reduction, the Government of Canada should consider alternative means of valuing disaster risk, losses and costs. As revealed by recent experiences with pandemics, flooding, and wildfires, disasters have knock-on and complex results for social and community health, well-being, and security. Losses from disasters include not only loss of property, but shocks to community well-being, resilience, social supports, and capacities that also need to be reconstructed following a disaster. One-dimensional measures that value disaster losses only in terms of financial losses tend to underestimate the true cost of adaptation and recovery, and will likely leave many behind as a result. In addition, the onus should be placed on governments, rather than on households and businesses, to prepare for disasters. Work must be done with the collaboration of municipalities, and resources must be given to them to evaluate the risks and adapt accordingly.

- Which sustainable development issue(s) do you think are missing or need more emphasis?

SDG ‘Enablers’: Respect for Future Generations, an SDG Advisory Body and UNDRIP

Intergenerational Equity

Climate change will likely impose high costs and losses on future generations and inhibit the ability of young people to reach their maximum potential. Addressing the intergenerational aspects of climate change means looking ahead beyond the immediate news or political cycle, and listening to the concerns of youth ([Commissioner on the Environment and Sustainability](#)).

**Will Canada ensure that the concerns and needs of future generations are incorporated into national legislation to mitigate and adapt to climate change?**

SDG Advisory Body

**In order to promote an all-of-society effort toward the achievement of the SDGs in the short time left before 2030, Canada should convene an SDG advisory body or roundtable, and provide greater support for civil society.** Around the world, civil society activists have noted the shrinking of spaces



for public dialogue and civic planning, as extremism and incivility have taken hold ([Cooperation Canada](#)). By opening up more space for civil society to coordinate and share knowledge, the Government of Canada will benefit from consensual, clear-eyed advice driven by an ethic of public caring and concern.

The need for more intergovernmental coordination has been cited by our members. Municipal and provincial governments tend to wait for federal action before moving forward on these issues. Instead, different levels of government should be acting in parallel with the federal government, not waiting for whenever things are mandated.

In particular, RCEN's SDG Caucus echoes Cooperation Canada's call to provide flexible funding to support the operation of CSOs (Civil Society Organizations) in contexts of closed or closing civic space. Will Canada properly resource, enable and encourage civil society participation, in a time bound, transparent and accountable way? Will we draw upon best practices of other countries who lead in this regard, for example, through the creation of a national SDG forum?

#### UNDRIP

The UN Declaration on the Rights of Indigenous Peoples was adopted by the General Assembly in 2007, but has only recently become influential in Canadian policies and laws. Recognizing that progress has been made toward mainstreaming Indigenous concerns into the SDGs implementation plans (as stated in Canada's 2017 National Voluntary Review), the Caucus supports the government's commitment to align Canadian laws with the UNDRIP (as exemplified through the UN Declaration on the Rights of Indigenous Peoples Act) and encourages the government to follow through on its commitment to developing a Recognition and Implementation of Rights Framework in full partnership with First Nations, Inuit and Metis people ([Govt of Canada](#)). RCEN's SDG Caucus welcomes the government's attention to its responsibilities under UNDRIP, and urges the Federal Sustainable Development Strategy to more directly work towards **decolonizing the systems of planning and decision making** that have so often sidelined and devalued Indigenous knowledge and experiences, to the detriment of the goals of environmental protection. **Will Canada ensure that promising legislative tools that recognize indigenous and environmental rights are respected and enforced?**

- Sustainable development encompasses environmental, social, and economic issues. Are these linkages captured well (for example in the chapters on SDG 1, No Poverty, SDG 4, Quality Education, and SDG 10, Reduced Inequalities)?

#### Environmental, Social and Economic Issues are Linked

The FSDS recognizes the negative social impacts of climate change and how these disproportionately affect poor and vulnerable populations. The move to incorporate the right to a healthy environment in Bill S-5 (amending the Canadian Environmental Protection Act) is a great starting point that can be expanded to include recognition of the linkages that already exist between environmental and social issues. For example, private vehicles are one of the main sources of GHG emissions, a prohibitive cost to low-income families, a barrier to create more green spaces and a key driver of inequality in urban areas since the most vulnerable populations do not have access to a vehicle and cannot access many of the amenities, services and jobs that cities have to offer. It is also important to note that most of those problems will not go away with electric vehicles; prioritizing public transit and active transportation will have a much bigger positive impact.

Climate information is an important linkage with SDG#4. It is also important to equip our education systems with practices conducive to sustainable living such as growing organic food, cooking, cycling



to school, home weatherproofing and energy saving. Enhanced Citizen Science would encourage Canadians to learn more about endangered species, invasive species and nature in general. Many Canadians know little about these issues, and programs should encourage the participation of all ages to learn more.

The indivisibility of the SDGs is the primary feature that prevents so-called ‘spillover’. Negative effects occur when unanticipated consequences arise from siloing between countries and agencies, or between government and society actors. Each country's actions can have positive or negative effects on other countries' abilities to achieve the SDGs. The SDG Index indicates that Canada's efforts to achieve the Goals may be causing ‘spillover’ negative effects, and Canada is ranked [quite low in this area](#). In particular, greater synchrony between domestic and international Goals, through Goal 17, is needed to prevent any domestic progress from being undermined by Canada's involvement in international trade, finance, development assistance, and strategic alliances. As well, Canada is weak in the provision of international concessional public finance, including official development assistance as a % of Gross National Income. **Will Canada do more to ensure that Canadians' efforts to advance sustainable development are not undermined by transferring the costs of adaptation to poorer countries and peoples?**

The SDGs' focus on the need to be inclusive and to ensure that none are left behind points to a necessity to ensure that new investments and resources are appropriately directed towards those people most in need and exposed to environmental risks. To date, Canada's model of resource-extractive economic development has concentrated wealth under the exclusive control of a small elite of privileged companies and individuals. Particularly problematic in this regard are the mining, forestry, and food and agriculture sectors whose activities are disproportionately affecting SDG #15, Life on Land. **It is vitally important to recognize the linkages between social inequity, freedom from poverty, and life on land, especially as these pertain to Indigenous peoples.**

- The move to establish a \$50 million BC Old Growth Nature Fund to halt old-growth logging in BC is welcome, but more is needed to ensure the government's goals are met.
- Currently the Fisheries Act administered by the Minister of Fisheries and Oceans is commendable, and furthers protections of nature and biodiversity for SDG#14 Life Below Water. However, what is lacking is an act to provide legislative protections to the birds of the air (including native species as well as migratory) the rich biodiversity of flora and fauna on land (including insects the “bird food on wings”) in support of SDG#15 Life on Land. Where the fisheries act protects all species of fish and also provides strong protection for fish habitats, including marine plants, a similar strong act is needed for the other wildlife.
- Whereas the Fisheries act provides protection for life below water where the water is defined as Canadian waters, the Canadian Wildlife Act does not protect Canada's lands and wildlife in the same manner, and this is much needed. Songbirds, raptors, and wildlife species are declining in numbers and they would be better protected with appropriate legislation instead of loopholes. Where it is important to conserve fish, it is also important to recognize Canada's flora and fauna and rich biodiversity.

As well, although the government has moved to enhance its GBA+ (Gender-Based Analysis) policy and lens in federal impact assessment and energy project reviews, similar attention in the SDGs would be consistent with this government's commitments and actions towards equity and inclusion under those instruments. This particular linkage does not appear to be a central or current focus of the Strategy.

- What do you think is the Government of Canada's primary role in driving sustainable development forward?



The Government of Canada's primary role in driving sustainable development forward is to initiate, enable, support, and sustain the efforts of all Canadians to contribute to the achievement of the Goals. As stated by Cooperation Canada: "The pace to achieve the SDGs is not fast enough, This is not a fatality. We have seen progress in some areas, but there is a need to accelerate the SDG implementation." (Also see [Key Messages](#) document)

Cities currently contribute more than [80% of global GDP](#) and are responsible for more than [70% of greenhouse gas emissions](#). The concentration of people, resources and consumption places cities at the forefront of addressing global sustainability challenges. Additionally, many of the decisions and actions to redesign and repurpose infrastructure to provide the solutions lie with local government and institutions. Given the role that cities need to play, providing tools and resources to build capacity at the local level is one of the main ways the Government of Canada can support all Canadians.

- Do we have the right targets and indicators to advance and measure performance?

RCEN's SDG caucus echoes Cooperation Canada's call for the development of a new SDG 17 indicator to measure civil society engagement in SDG implementation. As well, there is a growing interest in the development of Voluntary Local Reviews (VLRs) by cities and regions, however comparable data on the SDGs at the local level remain scarce. VLRs and an overview of local level progress should be integrated in the national targets and the Voluntary National Review. Finally, the Caucus suggests that a system of public annual reporting be instituted to ensure that Canadians can track progress and identify areas in need of more support. Without detailed data (like for GHGs) it is difficult for the public to understand where we are and the priorities/policies we have to establish, and who has to be accountable for it. **Most importantly, greater budgetary alignment with the existing SDG indicators would aid in the tracking process.** What are the Canadian investments that help achieve the SDGs? What are the projects that don't serve the SDGs?

- What is the future of sustainable development?

The future of sustainable development lies in the decisions made today, but will be experienced by future generations. Success in meeting these Goals requires not only political will today, but also multi-year investment by the Government of Canada as well as new, revised, and enhanced legislation and regulatory instruments. Unstable governments and political calendars cannot be put ahead of sustainable development plans, and changes in politics cannot be allowed to derail these efforts to move Canada forward. Time is running out.

- How do you see this concept changing?

Canada is in serious danger of becoming an international laggard on sustainable development. Canada is falling behind on commitments, having been ranked 21st on the [SDG Index](#) overall (2022 Index). Strong goals and targets are of little use if the political will and institutional coordination are lacking to make these targets work. Canada's track record can improve, but only with the coordinated all-of-society effort that sustainable development requires.