Written Submission
Bill C-57: An Act to Amend the Federal Sustainable Development Act

International Institute for Sustainable Development
and the Canadian Council for International Co-operation
List of Recommendations

Recommendation 1: That the Federal Sustainable Development Act (FSDA) in its Purpose, as a Principle, or in the Content of the Federal Sustainable Development Strategy, make explicit reference to the SDGs and their implementation.

Recommendation 2: That the FSDA in its Purpose explicitly identifies that sustainable development is a whole-of-government objective encompassing a full spectrum of human and natural sustainability.

Recommendation 3: That the Schedule of the Financial Administrations Act, which lists the designated entities to the FSDA, explicitly reference the Eight Ministers as the lead departments responsible for implementing the SDGs in Canada.

Recommendation 4: That principle 5 (c) be aligned with the Canadian Government’s Directive on Open Government to read as follows: “the principle of openness and transparency, which is the principle to maximize the release of government information and data to support accountability and public engagement.”

Recommendation 5: That the reporting cycles under the FSDA be aligned with the preparation of Voluntary National reviews to the UN’s High-level Political forum, so that reports on implementing the Federal Sustainable Development Strategy can be made available to the public six months before the Canadian Government submits a Voluntary National Review. We would also recommend aligning reporting formats so that information from reports under the Act can easily be used in VNR reports.

Recommendation 6: That this Committee ensure that the Act and the Federal Sustainable Development Strategy remain closely aligned with, and complementary to, the national strategy for implementing the SDGs, which is being developed by Employment and Social Development Canada.
The International Institute for Sustainable Development (IISD) and the Canadian Council for International Co-operation (CCIC) appreciate the opportunity to make this submission to the House of Commons Standing Committee on Energy, the Environment and Natural Resources with respect to Bill C-57, An Act to amend the Federal Sustainable Development Act.

IISD is an independent think tank championing sustainable solutions to 21st–century problems. Our mission is to promote human development and environmental sustainability. We do this through research, analysis and knowledge products that support sound policy-making. Part scientist, part strategist—IISD delivers the knowledge to act.

CCIC is Canada’s national coalition of civil society organizations working to end global poverty and promote social justice and human dignity for all. Our 80-plus members include many of Canada’s leading international development and humanitarian assistance organizations.

We welcome the Standing Committee’s study of Bill C-57 and the proposed changes to the Federal Sustainable Development Act. In particular, we are pleased that the Act now includes the environmental, social and economic aspects of sustainable development. We also welcome the inclusion of a broader set of principles, including on intergenerational equity, openness and transparency, involvement of Aboriginal peoples, and collaboration.

We believe that these amendments will allow the Act to play an essential and integral role in Canada’s efforts to achieve the Sustainable Development Goals at home and abroad – something which the Standing Committee on Environment and Sustainable Development stated should be the central purpose of the Act in its 2016 “Report Following an Assessment of the Federal Sustainable Development Act.”

In 2018, CCIC in collaboration with IISD and other partners around the world assessed the Voluntary National Reviews that 42 countries submitted to the United Nations High-level Political Forum on Sustainable Development. Voluntary National Reviews are the principal means by which countries report on their efforts to implement the SDGs. The report we produced helped to identify national best practices in implementing the SDGs and reporting on national progress. Our recommendations are informed by the findings of that report and focus on the following:

1. Linking the Federal Sustainable Development Act to the SDG framework
2. Access to information
3. Reporting

**Linking the Federal Sustainable Development Act to the SDG framework**

On the first point, we reiterate our previous recommendation that the Committee consider making explicit reference to the SDGs and their implementation in the purpose of the Act, as a Principle, or in the Content of the Federal Sustainable Development Strategy. This is in keeping with Recommendation 6 in the report of the Committee on Environment and Sustainable Development.
The SDGs are intended as a universal framework for achieving sustainable development in all countries. Agenda 2030 does not impose direct obligations on countries other than to nationalize it. As such it is instrumental to link the Federal Sustainable Development Act to the SDGs. This will ensure that Canada’s domestic targets are in line with the SDG framework – a framework which also reflects targets regarding many other international obligations.

The 2030 Agenda further recognizes that sustainable development can only be realized if all SDGs are achieved simultaneously. To recognize this indivisibility, the revised Act should also explicitly identify in its purpose that sustainable development is a whole-of-government objective encompassing a full spectrum of human and natural sustainability. This is in keeping with Recommendation 2 in the Report of the Standing Committee on Environment and Sustainable Development.

In this vein, we finally also recommend that the Schedule of the Financial Administrations Act, which lists the designated entities to the FSDA, explicitly reference the Eight Ministers as the lead departments responsible for implementing the SDGs in Canada. This would help ensure a strong focus within and across these Departments on all three pillars of sustainable development and the SDGs. This integrated approach is a core principle of the 2030 Agenda and would help actively foster policy coherence for sustainable development.

**Access to information**

Regarding our second point, access to data and information, we underline that such access is a precondition for accountability. We welcome the inclusion of principle 5 (c) which states that the release of information should be encouraged to support accountability and public engagement. We note however that to ensure accountability the release of information should be the norm and that restricting access to information should require justification. This is in keeping with Canada’s commitment to Open Government and its “open by default” policy.

We recommend aligning principle 5 (c) with the Canadian Government’s Directive on Open Government to read as follows: “the principle of openness and transparency, which is the principle to maximize the release of government information and data to support accountability and public engagement.”

**Reporting**

Finally, Agenda 2030 places special emphasis on voluntary reporting. As civil society organizations we welcomed the opportunity to provide inputs to Canada’s first Voluntary National Review presented to the High-level Political Forum in July 2018. We note however, that the transparency and openness of the process, and especially the inclusion of non-state actors, must improve to ensure that the Canadian Government is accountable, and its Voluntary National Reviews are truly inclusive and national in scope.

The reporting required under the Act provides an opportunity to do so. The reports on implementing the Federal Sustainable Development Strategy provide valuable insights on the efforts made by the Federal Government to achieve progress towards the SDGs. We recommend aligning the two reporting cycles so that reports on implementing the Federal Sustainable Development Strategy can be made available to the public six months before the Canadian Government submits a Voluntary National Review. We would also recommend aligning reporting formats so that information from reports under
the Act can easily be used in VNR reports. In doing so, the Federal Government would set an example of good practice that could be followed by provincial and territorial governments.

Finally, while this does not necessarily relate to changes to the Act, looking forward, we encourage this Committee to ensure that the Act and the Federal Sustainable Development Strategy remain closely aligned with, and complementary to, the national strategy for implementing the SDGs which is being developed by Employment and Social Development Canada.