



Brief submitted to
Environment and Climate Change Canada (SDO-BDD)
regarding the 2026 – 2029 Draft Federal Sustainable Development Strategy

by
Seniors for Climate Action Now!

May 11th, 2026



Seniors in Canada are faced with the realization that for the first time in recent history, we will be leaving less to our grandchildren and great grandchildren than what was bequeathed to us. Polluted air, soil, and water, and related diseases; a constantly shrinking level of biodiversity; extreme weather, floods and wildfires due to deforestation and climate change...the list goes on.

This is not the heritage we want to leave to future generations. In our view the 2026-2029 Federal Sustainable Development Strategy should significantly contribute to reversing the current trend and leaving our children a healthier planet and more humane human practices that are sustainable and in harmony with nature. Specific and measurable commitments need to be made to protect our citizens, future generations and the environment, and reduce climate change.

Your consultation asked for comments on the FSDS on three aspects: the draft FSDS goals, the targets and implementation strategies and the issues that are missing or gaps in the FSDS. *SCAN! cannot, at this time, comment on all the goals and targets proposed; our comments will be focused on some of the goals and implementation strategies in the sections related to “Driving Clean Growth” and “Protecting our Environment and Well-being”.*

FSDS GOALS FOR DRIVING CLEAN GROWTH

GOAL 2.1: BUILD A PRODUCTIVE AND LOW-CARBON ECONOMY

The FSDS mentions the need to accelerate Canada’s transition to a net-zero economy, a goal that we agree with. However, while many countries are increasingly turning to renewable sources of energy, **Canada is lagging behind amid a global economy that is gradually decarbonising.** In our view, a “Strong – and sustainable- Canada” is one that is aggressively moving towards clean, carbon-free electricity generation produced predominantly by renewable sources of energy, rather than one based on carbon-laden fossil fuels—which are largely responsible for climate change and its worsening impacts.

Therefore, we believe that to truly “drive clean growth” the goal should rather be to “Build a productive and carbon-free economy, with electricity generation produced predominantly by renewable sources of energy”. The targets for this goal should be modified accordingly.

To help achieve this SCAN! recommends that the FSDS include specific goals and targets regarding a **National Electrical Grid**. The demand for electricity will rise substantially over the next several decades as Canada transitions to an economy where electricity from renewable energy is the primary source of power driving all sectors. Solar energy, wind power, and hydroelectric resources are spread across the landscape of Canada. Linking these sources of power to the demand centres of Ontario, Quebec, and western Canada is a major challenge.

Building a system of high-voltage electrical power transmission is essential for the development of Canada. Canada can be an energy superpower - a superpower based on clean carbon-free electricity generation that is predominantly generated by renewable sources of energy. But in order to achieve this we need to build a backbone, and that is a high-voltage direct current transmission overlay that runs east-west with multi-terminal access for regional networks.

Electrical transmission systems are costly and take several years to build. But their construction is imperative if the potential of Canada’s renewable sources of energy is to be fully exploited. Electrical power will move effortlessly across Canada linking the offshore wind resources on both coasts with other renewable sources of energy: solar, geothermal, and hydropower, that are located across the provinces. The first segment of this HVDC transmission system should link the resource-rich windpower areas of Atlantic Canada with the load centres of southern Ontario.

We must also highlight that the current target 2.1.2 and implementation strategies 2.1.2.1 and 2.1.2.2 are centered on the use of “**clean technology**” a term that is not defined and ambiguous. A definition such as the one used in the Income Tax Act should be used, which refers namely to “equipment used to generate electricity from solar, wind and water energy; stationary electricity storage (batteries, pumped hydro) that doesn't use fossil fuels; active solar heating; and air/ground source heat pumps. with a target more.

SCAN! opposes spending public funds or lending public support to projects which promote and prolong the consumption of fossil fuels. These won’t provide economic security to Canada. They will lead to climate disaster with unimaginable costs and consequences for each of us and our communities.

GOAL 2.3: INCREASE THE NUMBER OF HOUSEHOLDS IN ACCEPTABLE HOUSING

Target: 2.3.1: More than 72% of households live in acceptable housing.

Goal 2.3's introduction mentions that "housing is essential for health and well-being. Its affordability and availability are major concerns for Canadians" and that there is a "lack of housing affordability". We agree.

SCAN! proposes the addition of **Zero-Carbon Retrofit for Non-Market Housing** to the Implementation strategies of Goal 2.3 of the FSDS.

SCAN! calls on federal and provincial governments to develop Canadian programs and capital financing to speed up and scale up retrofits of existing nonmarket housing in the order of 50,000 homes per year. This project focuses on non-market housing as defined in Figure 1. The program focuses on homes occupied by tenants who have a hard time coping with rising housing and energy costs.

Through this program existing, homes will be weaned off fossil fuels, become 80% more energy efficient, be made more resilient to climate change and have extended lifetimes which will avoid the waste and carbon production involved with building new homes to replace them.

Such an initiative will create a competitive and effective industry in Canada for rapid-pace and cost-effective retrofits. The techniques designed for this program can also spin off into market housing and industrial buildings. Retrofits and installation of new technologies in the homes will create good forward-looking jobs.

The financing should be organized by CMHC and be provided directly to community housing organizations. Financing is key because the retrofits require stable long-term lending at low interest rates.

Another important gap has been identified in the implementation strategies proposed: none of them actually suggest specific and concrete measures to increase affordable housing on a permanent base. SCAN! proposes the addition of a **Permanent Non-Market Housing Program** to the Implementation strategies of Goal 2.3 of the FSDS.

In 2023, the Office of the Federal Housing Advocate estimated that Canada needs 4.4 million units of affordable housing for very low and low income households. This need cannot be met by the federal government's current *Build Canada Homes program*, which is forecast to produce just 26,000 units in the next five years, including roughly 13,000 designated as affordable housing.

SCAN! calls for a much more ambitious, federally led national **non-market housing program** that aims to build two million new non-market housing units over the next five years, as called for by municipal councillors and mayors in Elbows Up for Climate. This new

non-market housing should be built to meet Tier 4 of the National Housing Code, with close to net-zero carbon emissions.

Fig.1: Non-Market Housing

THE HOUSING CONTINUUM



Source CMHC

Housing built under the program in urban centres should achieve the goals of compact urban form; i.e., within existing municipal boundaries (no sprawl), close to public transit with minimum parking, and in areas with a high standard of public and private amenities and services to reduce travel demand and residents' costs.

To ensure sustainability and reduce cost, land banking and land assembly should be a component of the program. To ensure resilience to climate impacts such as heat, floods, and windstorms, climate change adaptation planning and building practices must be incorporated.

Recruitment, training and deployment of a skilled work force, particularly for youth, would be a complementary program component developed with provincial partnerships. As in the post WW2 non-market and market housing programs, financing would be most economically provided by direct lending from the Bank of Canada to the national housing agency.

GOAL 2.5: EXPAND ACCESS TO SUSTAINABLE TRANSPORTATION

Target 2.5.1: 22% of commuters use sustainable transportation.

Implementation strategy 2.5.1.1: Invest in transportation projects that reflect best practices for active and public transit to increase the use of sustainable transportation and promote active lifestyles and behaviours.

Target 2.5.2: Zero-emission vehicles represent 100% of new light-duty vehicle sales.

Interim target: By 2030, zero-emission vehicles represent at least 60% of new light-duty vehicle sales.

Encouraging Zero emission vehicles with consumer incentives, and a coast-to coast network of electric vehicle fast chargers, are a crucial to expand access to sustainable transportation.

SCAN! suggests adding the following Implementation strategy regarding public transit, a **Fast Fare-Free Urban Transit** national program for fast fare-free transit in urban areas. Low-cost, efficient, and convenient public transit motivates private drivers to leave their cars at home, allows low-income residents to gain increased access to essential services and amenities and reduces GHGs.

Public transit should be operated and funded as a public good. The greatest impact of fare-free public transit is to increase the accessibility of services and amenities to low-income individuals and families.

When fast fare-free transit is combined with an expanded, efficient, pleasant and safe public transit system, people will switch from their private gas fuelled cars. The result will be increased social equity, reduced GHGs and other pollutants, reduced car accidents and their consequent costs, and increased availability of land for purposes other than private vehicles.

Transit offers the greatest return of any investment in public infrastructure in both jobs created and GDP growth. To maximize the creation of good jobs and import substitution, a fare-free transit program will also address fleet electrification and requirements for Canadian procurement.

FSDS GOALS FOR PROTECTING OUR ENVIRONMENT AND WELL-BEING

The FSDS is said to be aligned with the United Nations' 2030 Agenda for Sustainable Development and its 17 Sustainable development Goals (SDGs), namely to respect Canada's international commitments. UN Goal #13 is to take *urgent* action to combat climate change and its impacts: there is no sense of urgency in the FSDS. While goal 3.1 does provide some proposals to reduce greenhouse gas emission, "[Mitigation efforts](#)", according to the UN, include transitioning to renewable energy sources, adopting

regenerative agricultural practices and protecting and restoring forests and critical ecosystems, items for which there is little in the FSDS.

In addition, major projects and decisions by the current government contradict the principles of the United Nations' 2030 Agenda for Sustainable Development and its 17 Sustainable development Goals (SDGs), namely the continued support and subsidies, direct or indirect through taxation and otherwise, of the fossil fuel industry, the approval of additional pipeline, and the management of current "Projects of National Interest", where regulations protecting the environment and species at risks are seen as time-consuming regulatory hurdles that need to be bypassed, not respected.

The first section of the FSDS discussed the need to "Improve confidence in government". This can hardly be achieved when, on one hand, the government lauds sustainable development, while on the other hand adopting legislation such as Bill C-5 (Projects of National Interest) and Bill C-15's modifications to the Red Tape Reduction Act which both view hard won environmental, social, health and safety and human rights protections as an administrative burden imposed on businesses.

GOAL 3.1: REDUCE GREENHOUSE GAS EMISSIONS

Target: 3.1.1: Achieve net-zero greenhouse gas emissions.

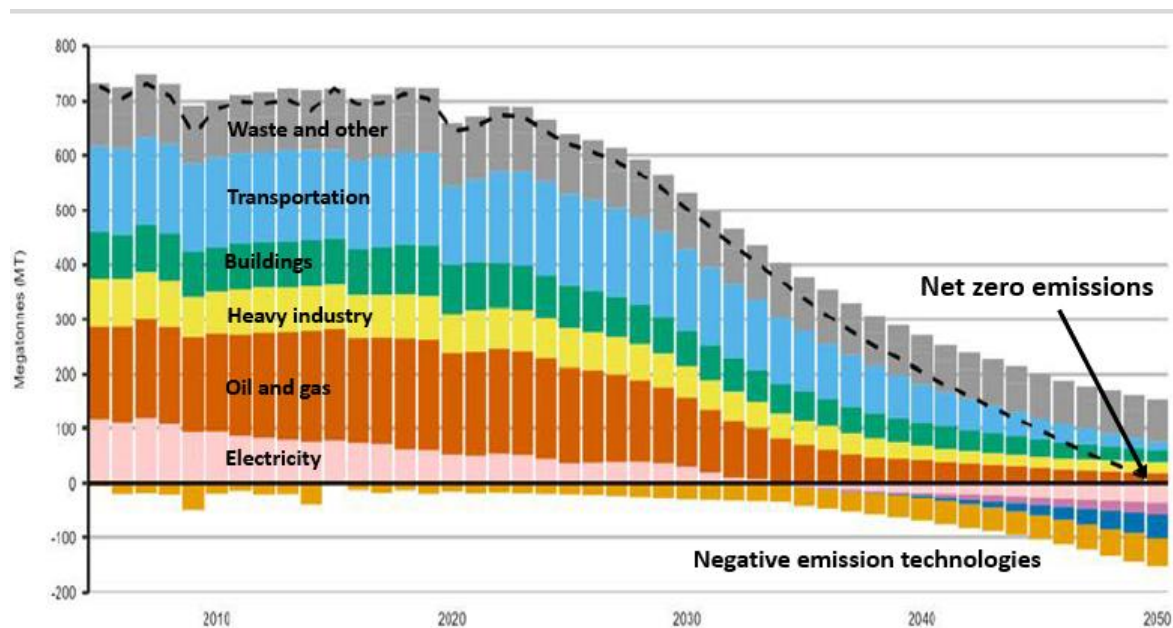
Interim target: By 2035, achieve 45%–50% of greenhouse gas emissions reductions.

Interim target: By 2030, achieve 40%–45% of greenhouse gas emissions reductions.

An economy can only be considered to be sustainable if, on balance, **it no longer emits GHG emissions into the atmosphere**. This condition is known as ***net zero emissions*** and it is the goal of the 2015 Paris Agreement that Canada signed along with over 190 other countries.

How can Canada reduce its GHG emissions to a level where they can be offset and balanced by what are called negative emission technologies?

The projected decline in GHG emissions is discussed in [*Canada's Energy Future 2023*](#) where the graphic shown below is presented. The projection shows GHG emissions through to 2050 in what is called the Global Net-Zero Scenario.



Is this scenario feasible? Can Canada's GHG emissions be reduced in 2050 to the level shown in the graph—which is about 165 MtCO₂e? That is a 75 percent decline in emissions from we are today.

This scenario relies on substantial declines in emissions in all economic sectors. Emissions from transportation and the oil and gas industry fall to almost zero. Emissions from the generation of electricity are entirely eliminated. There is only one way that GHG emissions can be substantially reduced in this way. That is by **the electrification of all sectors of the economy** and **the generation of electricity from renewable sources of energy**: mainly solar, wind and hydropower.

The goal of reducing greenhouse gas emissions can be achieved but only if the government acts forcefully to promote a shift to a carbon-free electrified economy. These actions include:

- The phasing out of all fossil fuel-powered electricity generation.
- Strong incentives to promote electric vehicles including the construction of charging points along all major highways and at all international airports.
- Disincentives for the continuation of the use of conventional vehicles including establishing 'low emission zones' in the centre of all major cities.
- The strengthening of carbon pricing mechanisms on greenhouse gas emissions from industry.
- Financing mechanisms for investment in utility-scale solar energy and wind power.
- Strong federal support for offshore wind power development in Atlantic Canada.

- Regulations on new housing construction that prohibit connections to fossil gas, and the routine installation of EV chargers and household batteries. All new housing must be 100% electric.
- The extension of federal programs providing funding for the installation of heat pumps and charging stations for electric vehicles in all buildings, as well as improvements in the energy efficiency of the structure.

Moreover, the 2025 budget sacrificed existing programs that would have driven down carbon emissions, such as funding for tree planting, home energy efficiency, and public transit. These programs need to be fully reinstated, and emission reduction programs need to be adequately financed.

The previous budget also set aside the government's avowed commitment to imposing a cap on emissions from the oil and gas sector. Instead, it prioritized the development of fossil fuel (LNG) facilities and extended the existing investment tax credit for carbon capture and storage for the fossil fuel industry. The efficacy of such measures is debatable and is almost certainly far less effective than claimed by the industry.

Given the recent agreement with Alberta extending the time for its methane reductions to 2035, extremely aggressive measures will be necessary throughout the rest of Canada to meet Canada's 2030 target

GOAL 3.2: SUPPORT CLIMATE ADAPTATION

Target 3.2.1: 60% of households factor climate change into their decision making.

Target 3.2.2: At least 75% of federal organizations have taken measures to address climate risks to their critical services and activities and ensure that climate risks to at least 75% of critical assets are assessed.

Extreme weather, flood, and wildfires are costing billions in insurable losses in Canada. They are increasingly costly for Canadians and the Canadian economy as a consequence of escalating physical and mental health impacts, property losses, and effects on productivity. Impacts on key infrastructure will become increasingly expensive at the municipal, provincial and national levels.

We are hoping the implementation strategies mentioned will be translated into specific and concrete additional help for citizens and municipalities to help them adopt the necessary measures for climate change adaptation: such actions should be viewed as essential *investments* in our future and that of future generations.

GOAL 3.3: PROTECT AND RESTORE CANADA'S ECOSYSTEMS AND BIODIVERSITY

Target 3.3.1: Conserve 30% of land and inland waters, and 30% of coastal and marine areas, in support of Canada's biodiversity commitments. Date to achieve target: 2030

Target 3.3.2: 60% of species at risk listed under federal law exhibit population trends that are consistent with recovery strategies and management plans. Date to achieve target: 2030

We are pleased to see the FSDS include some of Canada's obligations under the historic Kunming-Montreal Global Biodiversity Framework (KMGBF 2022) such as the conservation of 30 per cent of terrestrial and inland water areas, and of marine and coastal areas for 2030. Currently, only 12% of Canada's land and 14% of its oceans have some degree of protection. Sufficient *public* funding should be set aside to meet our obligations under the KMGBF agreement, considering this as an INVESTMENT in our collective future.

SCAN! has however identified the following gaps and missing issues in the FSDS in Goal 3.3.

An important missing issue is the lack of any reference or goals related to forest fires. Canada is committed to halting and reversing forest degradation and deforestation by 2030 under international agreements. To do this, Canada must protect forest biodiversity. In addition, in 2023 Canada produced 23% of global wildfire carbon emissions ...the last three fire seasons are among the 10 worst on record. Recent data suggests that global extreme fire incidents could rise by up to 14% by the year 2030, 30% by 2050, and 50% by the end of the century.

SCAN! recommends that the FSDS add the goal of creating a **National Agency to Prevent and Contain Wildfires and Protect Forests from Deforestation and Degradation**.

This agency would develop a wildfire prevention and containment policy and best-practice guidelines based on Indigenous knowledge and western science. It would include expanded roles for Indigenous Guardians in wildfire management. It would require increased funding, training and equipment, and the establishment of year-round well-paid, well-equipped and well-trained forest ranger and firefighting units. It will require greatly increased federal

expenditure for the purchase of a national fleet of water bombers and other equipment, and technology for planning and fire detection, and require planning in partnership with municipalities, and Indigenous communities.

Halting and reversing forest degradation and deforestation will require the federal government to account thoroughly for logging industry emissions, develop comprehensive regulations of the logging industry, ensure sustainable management to maintain their ecological integrity including preventing degradation of forest soils, prohibition of forest-derived biofuels, and enhancing biodiversity.

An additional missing issue under goal 3.3 is **Biodiversity Protection and Restoration**. The Kunming-Montreal Global Biodiversity Framework (KMGBF 2022) has two important targets for this : “Bring(ing) the loss of areas of high biodiversity importance, including ecosystems of high ecological integrity, close to zero by 2030 (Target 1) , and “Ensuring that by 2030 at least 30 per cent of areas of degraded terrestrial, inland water, and marine and coastal ecosystems are under effective *restoration*, in order to enhance biodiversity and ecosystem functions and services, ecological integrity and connectivity (Target 2). The UN agenda, Goal #15 also has the goal to “Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss”. Working to achieve these targets would require adding to the FSDS, for example specific goals and targets related to reducing the degradation of natural habitats and halting the loss of biodiversity outside of protected areas mentioned in Target 3.3.1.

Finally, the FSDS mentions developing Canada’s 2030 Nature Strategy as one of the efforts of the federal government to date related to this goal. However, the *2030 Nature Accountability Act* (Bill C-73) has still not been adopted: we recommend that its adoption as a legislative priority be included as target in the FSDS. The Bill urgently needs revision and enactment to ensure Canadians will benefit from cleaner air and water, greater food security, significantly reduced costs for climate adaptation, the protection of communities, and improved management of wildfires and extreme weather events. Critical amendments include requirements to: develop national biodiversity strategies and action plans; require and obtain Indigenous free, prior and informed consent on Indigenous Protected and Conserved Areas and territories; support Indigenous management and incorporate Indigenous knowledge of key biodiversity areas, and provide for mandatory application of the Species at Risk Act, with veto power, to all major infrastructure projects even if federal laws allow exemptions to be given.

Our final recommendation is to include in the FSDS a clear commitment to the **Youth Climate Corps (YCC)**, which should include financing it adequately. The Canada's Youth Climate Corps should be engaged in all the nations-building, GHG mitigating projects, carrying out hands-on work to build climate emergency skills at a time of rising youth unemployment. YCC-related tasks would overlap with, and reinforce, other proposals for nations building projects such as renewable energy installations and equipment, retrofit programs, net-zero building construction, national forest and wetland protection, adaptation projects and other skills-development programs. The project would create an ongoing and growing national constituency of experience and support for federal programs to address the climate emergency.

The Federal Budget 2025 announced public funding support of \$40 million for a two-year YCC program beginning in April 2026. It is not enough. YCC calls for increasing the program to \$1 billion on-going annual investment.

In contrast to the program announced by the Liberal government, the YCC envisions a transformative federally funded program, directed regionally by communities, with Indigenous sovereignty, knowledge and wisdom at its heart, to create tens of thousands of jobs across Canada. It will provide a pathway to long-term, well-paying careers in the net-zero economy, with evidence-based programming and projects developed in collaboration with industry, labour, youth, postsecondary and climate experts so youth are deployed on projects that maximize GHG reductions.

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Seniors for Climate Action Now! (SCAN!) is building a pan-Canadian seniors' climate action movement for the benefit of generations to come. We are working with youth and other climate activists to create a democratic, just, and transformative movement to address the climate crisis.

<https://seniorsforclimateactionnow.org/>