

April 2, 2019  
Environment and Climate Change Canada  
Sustainable Development Office  
200 Sacré-Coeur Boulevard, 7th floor  
Gatineau, Quebec, K1A 0H3  
Attention: Ms. Martine Dubuc, Associate Deputy Minister

Sent by email: [ec.bdd-sdo.ec@canada.ca](mailto:ec.bdd-sdo.ec@canada.ca)

Dear Ms. Dubuc;

**Re: draft FEDERAL SUSTAINABLE DEVELOPMENT STRATEGY FOR CANADA 2019 TO 2022**

The Canadian Brownfields Network (CBN) appreciates the opportunity to participate in Environment and Climate Change Canada's (ECCC) public consultation on the [draft Federal Sustainable Development Strategy for Canada \(FSDS\)](#). CBN's Government Relations Committee has solicited and compiled comments from interested members for the purpose of making this submission on behalf of CBN.

The CBN is a national network of individuals actively engaged in brownfield and site remediation activities, including policy development and implementation. CBN's membership disciplines include representation from environmental consultants and professionals, industry, academia, legal and government (both regulatory and public sector organizations). The CBN has developed a set of Guiding Principles in support of facilitating Brownfield development. For more information regarding CBN, please visit the website at [www.canadianbrownfieldsnetwork.ca](http://www.canadianbrownfieldsnetwork.ca).

CBN supports the Government of Canada's commitment to sustainable development. We recognize and appreciate the proposed reforms to the *Federal Sustainable Development Act*, which is the legal framework for the FSDS. We support the FSDS broader intent of greening Canada's operations and working with partners to conserve Canada's lands, waters and ecosystems.

The 2019 to 2022 FSDS proposes targets, milestones and actions in support of 13 aspirational long term goals. CBN believes that achievement of many of the 13 FSDS goals could be enhanced by the recognition and incorporation of cleaning contaminated sites and brownfield redevelopment, and we offer the following comments to illustrate some of these ideas.

**Effective Action on Climate Change**

- The redevelopment of underutilized and vacant brownfield sites in urban settings can revitalize neighborhoods, putting people and activities closer to urban cores, promoting densification and walkable communities, and reducing urban sprawl development and reliance on automobiles. The repurposing of compromised urban lands for redevelopment helps to meet the Government of Canada's objectives of encouraging clean growth, including a reduction of potentially harmful substances, and reducing carbon emissions.

## Greening Government

- The FSDS paper points out that the Government of Canada has a large real property portfolio that uses a significant amount of energy. Canada also has a significant portfolio of contaminated sites, administered under the Federal Contaminated Sites Action Plan (FCSAP). The federal government could demonstrate leadership on assessing and remediating their contaminated sites, and where feasible, redevelop federal contaminated sites with buildings constructed to be net-zero carbon ready.

## Healthy Coasts and Oceans, Pristine Lakes and Rivers, and Clean Drinking Water

- Government support for the legacy cleanup of harbours and waterways can have human health, environmental and economic benefits for the neighboring communities and residents. Current examples include the Wabigoon River at Grassy Narrows, ON, and the work in Hamilton's harbour.

## Safe and Healthy Communities

- The federal sustainability strategy advances the importance of safe and sustainable communities. This section of the FSDS document on page 92 discussed the need to assess and remediate contaminated sites to protect human health and the environment, and benefitting Canada's economy. CBN supports these aspirations, and we urge the Government to adopt policies and actions and funding programs that encourage collaboration between all stakeholders to promote and achieve greater brownfield redevelopment.

In closing, CBN's mandate is to develop solutions to facilitate brownfields redevelopment. All levels of government are important partners in developing and implementing these solutions, which contribute to safe and healthy communities. CBN is pleased that the Government of Canada's is committed to the Federal Sustainable Development Strategy, and we would look forward to discussing with ECCC how brownfield redevelopment could enhance the FSDS.

Yours truly,



Rob Hoffman  
Government Relation Committee  
Canadian Brownfields Network



D. Grant Walsom, P.Eng.  
President and Executive Chairman  
Canadian Brownfields Network