

CSLA Response to the Draft 2026–2029 Federal Sustainable Development Strategy

The Canadian Society of Landscape Architects (CSLA) appreciates the opportunity to provide comments on the 2026-2029 Federal Sustainable Development Strategy (FSDS) and acknowledges the Government of Canada's continued commitment to the principles of sustainable development as legislated under the Federal *Sustainable Development Act*. We are encouraged by the Strategy's alignment with the United Nations' 2030 Agenda and its Sustainable Development Goals, its whole-of-government framing, its attention to reconciliation and Indigenous rights, and its recognition that environmental, social, and economic priorities are deeply interconnected.

The CSLA would like to take this opportunity to express our concern that this Strategy echoes the language of its predecessors without meaningfully advancing the depth of action. Nearly 40 years after the Brundtland Report defined sustainable development for the world, and through six iterations of a Federal Strategy, sustainability has still not been mainstreamed as a core element of federal decision-making.

We highlight three overarching concerns:

1. The draft FSDS identifies provinces and territories, municipalities, Indigenous governments, civil society organizations, and the private sector as partners in implementing sustainable development, but notably absent from this list are the planning and design professions (i.e., landscape architects, planners, architects, and engineers) and construction industry partners whose work and expertise directly shapes the built environment at every scale.
2. The draft FSDS gives insufficient attention to the integration of sustainability across the full spectrum of Canadian landscapes, including urban, suburban, agricultural, and industrial, and treats nature and the environment as something apart from where development occurs. The vast majority of Canadians live in urban and suburban communities, and it is in those densely populated, intensively developed landscapes that the sustainability crisis is most acutely felt. It is also where the greatest opportunities for transformation exist.
3. The draft FSDS promotes sustainable development but does not require it. Across its goals and implementation strategies, the FSDS relies on education, awareness, voluntary measures, and incentives to advance sustainability outcomes. This approach is insufficient in a policy environment where competing legislative priorities consistently override commitments at the provincial and municipal level. Sustainable development will not be mainstreamed into federal decision-making until it is embedded in legislation, regulation, and binding conditions of federal investment.

The CSLA's more specific comments are organized according to the three-part structure of the draft Strategy. We have focused our feedback on the goals where landscape architecture practice most directly intersects with federal priorities, and where we believe where we can best contribute to strengthening the goals and implementation actions.

Building an Inclusive and Resilient Society

In building inclusive and resilient societies, landscape architects design public spaces, parks, and community infrastructure that support health and well-being, foster social cohesion, and ensure equitable access to nature for all.

FSDS Goal	CSLA Comments and Recommendations
<p>1.2 Reinforce Canadian Culture and Identity</p>	<p>Goal 1.2 is focused on the cultural identity of individuals with implementation strategies addressing language rights, cultural expressions and Indigenous cultural heritage. However, Canada's cultural landscapes are only referenced as a tool for growing the cultural economy. The CSLA does not diminish the importance of the other priorities identified, but notes that the landscapes in which Canadians live, gather, and connect with their history are themselves a foundational expression of Canadian identity. Canada's landscapes are central to who we are as a people and deserve explicit recognition and protection in this Strategy.</p> <p>The CSLA's Cultural Landscapes Legacy Collection (CLLC) documents landscapes from across the country that have made lasting contributions to their communities and, ultimately, to Canadian society. These landscapes represent the full spectrum of Canada's cultural and natural heritage. The intent of the collection is that this list will continue to grow over time; however, many of these landscapes are at risk. For example, Ontario Place in Toronto, a celebrated example of mid-century modernist landscape development, has been predominately and cavalierly lost to the pressures of a redevelopment proposal. And on the Atlantic coast, the Fortress of Louisbourg, a National Historic Site managed by Parks Canada, is increasingly threatened by coastal erosion and sea level rise driven by climate change. These are not isolated cases. Canada's cultural and natural heritage landscapes are at risk.</p> <p>The FSDS should explicitly address their protection and should establish mechanisms by which to identify, protect, manage, conserve and celebrate cultural landscapes of national significance</p>
<p>1.3 Reduce Poverty in Canada; and 1.4 Reduce Systemic Racism and Discrimination</p>	<p>The Strategy plans to address poverty primarily through income support and social services, and commendably names environmental racism as a dimension of systemic discrimination. However, neither Goal 1.3 or 1.4 adequately acknowledges the role of the built environment and inequitable distribution of green space, natural infrastructure, safe modes of active and public transportation, and healthy urban landscapes in perpetuating inequities and discrimination.</p> <p>Access to nature is not a luxury; it is a social determinant of health and well-being with measurable consequences for physical and mental health outcomes. As the CSLA's The Power of Nature for Mental Health and Well-Being documents, nearly three in four Canadians live in large urban centres, and children living in less-green neighbourhoods are between 15-55% higher risk of developing mental health issues in adulthood, a burden that falls disproportionately on lower-income, racialized, and Indigenous communities.</p> <p>Environmental justice ensures that all Canadians, regardless of income or postal code, have</p>

	<p>access to clean air, clean water, safe public spaces, and nature. And while the FSDS already identifies ECCC as responsible for strengthening efforts to address environmental racism, it stops short of connecting this mandate to the delivery of green infrastructure in underserved communities. Landscape architects, working alongside Indigenous and racialized communities, are equipped to design and deliver this investment in ways that are culturally appropriate, ecologically sound, and community-driven.</p> <p>The FSDS should address environmental justice as an explicit and integrated dimension of both the poverty reduction and anti-racism goals.</p>
<p>1.6 Improve Indigenous Peoples' Prosperity</p>	<p>Goal 1.6 frames Indigenous prosperity almost entirely through the lens of employment rates and skills training, with implementation strategies focused on closing the labour market participation gap. While these are important objectives, this framing fails to recognize the value of Indigenous-led community development, according to Indigenous values and priorities, as a powerful and self-determined pathway to long-term prosperity.</p> <p>Housing and community development on lands that Indigenous communities have reclaimed or retained is increasingly recognized as a meaningful opportunity for reconciliation and economic self-sufficiency. The ʔəyalməx^w / Iyálməxw / Jericho Lands project in Vancouver, where the Musqueam, Squamish, and Tsleil-Waututh Nations are leading the development of a 36-hectare mixed-use community of 13,000 homes with 12 hectares of parks and open space, with land retained in Indigenous ownership in perpetuity, demonstrates what Indigenous-led, landscape-integrated community development can achieve (Learn more about this project in the CSLA's new Infrastructure Brief). Such projects can provide affordable homes, support Indigenous business development, express Indigenous cultural values, and build long-term community capacity in ways that employment programs alone cannot achieve.</p> <p>The FSDS should broaden Goal 1.6 beyond employment metrics to explicitly recognize and resource Indigenous-led community planning and development as a pathway to prosperity, self-determination, and reconciliation.</p>

Driving Clean Growth

The CSLA strongly supports the federal government's ambitions for clean economic growth, and notes that landscape architects are already leading infrastructure transformation across Canada ensuring that economic growth does not come at the expense of environmental health or long-term livability.

FSDS Goal	CSLA Comments and Recommendations
<p>2.3 Increase the Number of Households in Acceptable Housing</p>	<p>The CSLA welcomes the federal government's commitment to addressing the housing crisis, but cautions that a narrow focus on the speed and quantity of units will produce communities that fail Canadians over the long term.</p> <p>In Making the Case: Landscape Architects as Infrastructure Leaders in Canada (Spring 2026) the CSLA describes how progress on housing has been tracked by the number of units delivered relative to targets, with little monitoring of the affordability, livability, or sustainability of the homes and neighbourhoods being created. Unit sizes have continued to shrink, requirements for public open space and green infrastructure have</p>

	<p>declined, and there has been a persistent mismatch between the housing products being delivered and the demand for high-quality, livable family homes and communities.</p> <p>The federal government has a direct opportunity to model a different approach through its own landholdings. The Canada Lands Company projects such as Downsview in Toronto and ʔəyalməx^w / lyálmexw / Jericho Lands in Vancouver demonstrate what landscape-integrated, sustainability-first community development can achieve. The Port Lands Flood Protection Project in Toronto is another example of how a landscape-led project can unlock a climate-resilient housing development while delivering significant economic returns. The next phase of this waterfront redevelopment is projected to provide 14,000 new homes and support 100,000 skilled trade jobs, equating to \$13.2 billion in economic development opportunity.</p> <p>These examples stand in sharp contrast to recent legislative trends at the provincial level. Across the country, the pressure to accelerate housing delivery is being used to justify the rollback of the very standards that ensure new development is safe, healthy, and resilient over the long term. When the federal government promotes sustainable development rather than requiring it as a condition of investment, it leaves the door open for exactly this kind of regression. Federally funded communities should set a standard for housing projects across the country, not the exceptions.</p> <p>The FSDS should explicitly require that all federal funded housing and infrastructure investments meet green infrastructure and sustainability standards, and that these standards be maintained as non-negotiable conditions of federal funding eligibility.</p>
<p>2.5 Expand Access to Sustainable Transportation</p>	<p>The FSDS's approach to sustainable transportation aims to increase the share of commuters using public or active transportation and to accelerate the uptake of zero-emission vehicles. While these are worthwhile objectives, they cannot be achieved without sustained investment in the infrastructure that makes public and active transportation possible. People do not choose to walk, cycle, or take transit in the absence of safe, well-designed, and well-connected infrastructure to support those choices. A strategy that promotes sustainable transportation without requiring the design and delivery of sustainable transportation networks will not move the needle.</p> <p>This point is made starkly by recent provincial interventions in municipal transportation planning. When provincial governments can override the active transportation decisions of municipalities, and the federal government responds only by promoting sustainable transportation rather than protecting and requiring investment in it, the result is a policy environment in which sustainable mobility networks are persistently vulnerable to political reversal.</p> <p>Landscape architects are central to the design of effective sustainable transportation networks, creating streets, trails, and transit corridors that are safe, attractive, and well-integrated into the communities they serve, making active transportation not just possible but desirable. The most effective sustainable transportation investments are not simply rapid transit lines, they are integrated landscape systems that are interconnected, safe, and accessible, and designed by qualified professionals.</p> <p>The FSDS should establish active and public transportation network integration as a mandatory condition of federal transportation and housing infrastructure funding.</p>

Protecting Our Environment and Well-Being

The goals addressing climate adaptation, biodiversity, and water quality are central to the work of landscape architects, and it is here that we see the greatest gaps between the Strategy's stated ambitions and the actions proposed to achieve them.

FSDS Goal	CSLA Comments and Recommendations
<p>3.1 Reduce Greenhouse Gas Emissions</p>	<p>The CSLA welcomes Implementation Strategy 3.1.1.3, which requires applicable federal construction projects to comply with the <i>Standard on Embodied Carbon in Construction</i>. This is an important and overdue step. The built environment, which includes buildings, public infrastructure, and constructed landscapes, is responsible for over 14% of Canada's greenhouse gas emissions, and embodied carbon represents a critical and largely overlooked dimension of this challenge.</p> <p>The CSLA urges the Government of Canada to extend the scope of this standard beyond buildings to explicitly include public realm and landscape infrastructure. Streets, parks, stormwater systems, and other public infrastructure are carbon-intensive to construct, yet are systematically excluded from carbon accounting frameworks. Landscape architects make consequential design decisions about materials, soil systems, plant assemblies, and site infrastructure that collectively determine the carbon intensity of every project they deliver, and these decisions are currently absent in federal emissions accounting. Equally important, carbon accounting for constructed landscapes must capture sequestration potential alongside embodied emissions. Vegetation, soils, and organic materials actively sequester carbon over time and sequestration is the only mechanism through which a development project can move beyond net zero to become genuinely carbon positive.</p> <p>The Landscape Carbon Benchmarking Study, commissioned by the City of Toronto and led by DTAH — recipient of a 2026 CSLA Jury's Award of Excellence — is one of the first studies in Canada to quantify both embodied carbon and sequestration in landscape design at the scale of typical urban development, providing a practical framework and defensible benchmarks that other orders of government can adopt.</p> <p>CSLA members have demonstrated a clear willingness to lead on carbon-conscious design, but professional commitment alone cannot drive consistent outcomes without regulatory requirements. Federal leadership in this area would drive adoption across jurisdictions and ensure that Canada's built environment becomes a genuine contributor to the country's net-zero commitments.</p> <p>The FSDS should recognize that the Standard on Embodied Carbon in Construction should be extended to include landscape and public realm infrastructure, require sequestration accounting alongside embodied carbon measurement in federally funded projects, and support the development of national benchmarks for low-carbon landscape design.</p>
<p>3.2 Support Climate Adaptation</p>	<p>Goal 3.2 identifies barriers to climate adaptation as including “limited public awareness, resource constraints, and gaps in data and infrastructure”. The CSLA would suggest that one of the most consequential barriers is that governments at</p>

	<p>all levels have failed to adopt legislation and policy frameworks necessary to require adaptation. The draft FSDS acknowledges that preparing for climate change is a proven, cost-effective approach to building resilience, yet its implementation strategies rely primarily on increasing awareness and education and voluntary measures. Meanwhile, governments continue to permit new development in known floodplains, remove green development standards, and treat climate resilience as an optional development enhancement rather than a baseline requirement.</p> <p>The target of 60% of households factoring climate change into their decision-making reflects this same limitation; it measures awareness at the individual scale rather than action at the scale of policy, planning, and design where the most consequential decisions are made. Individuals cannot be held accountable for outcomes that governments oversee. Canada must move toward active preparation for sea level rise, wildfire, severe weather events, and disruption to food and water systems, and it must do so at the community and landscape scale, not the household scale.</p> <p>Landscape architects are already delivering this work across Canada. The Port Lands Flood Protection Project in Toronto, led by landscape architects MVVA, protects 290 hectares from flooding through a landscape-led natural infrastructure system that simultaneously delivers 25 hectares of new parkland and unlocks development opportunities for 14,000 new homes. In Kelowna, landscape architects are central to the city's Community Wildfire Resiliency Plan, embedding FireSmart principles into community design, vegetation management, and long-term land use planning across one of Canada's most fire-prone urban landscapes.</p> <p>The FSDS should establish mechanisms for formal engagement with landscape architects and other allied design professions in the development and implementation of adaptation strategies at the community scale, and move beyond household awareness targets toward legislative and regulatory requirements that embed climate resilience into land use planning, development approvals, and infrastructure investment.</p>
<p>3.3 Protect and Restore Canada's Ecosystems and Biodiversity</p>	<p>The draft FSDS treats nature and the environment as something that needs protecting somewhere apart from where development occurs. The Strategy's approach to biodiversity is focused primarily on wild and remote landscapes, relying almost exclusively on Environment and Climate Change Canada and the Department of Fisheries and Oceans for implementation. Conspicuously absent from this goal is the acknowledgment that habitat destruction, land conversion, urban sprawl, impervious surfaces, and the fragmentation of ecological corridors are the primary mechanisms through which biodiversity is lost, yet none of these pressures are addressed in the implementation strategies under Goal 3.3.</p> <p>This approach fails to reflect Canada's own international commitments to the Kunming-Montréal Global Biodiversity Framework, which explicitly targets densely populated areas, urban green and blue corridors, and the role of development, agriculture, and forestry in driving biodiversity loss.</p> <p>The greatest opportunities to protect and restore biodiversity at scale exist in the landscapes where biodiversity is most at risk and can simultaneously provide the co-benefits of community health and wellness and climate resilience. Landscape</p>

	<p>architects are already delivering this work. In Vancouver, the St. George Rainway transformed four city blocks of street into a multifunctional green corridor integrating rain gardens, bioswales, and native plantings that manage stormwater, filter roadway pollutants harmful to salmon by up to 98%, and create urban habitat, demonstrating how everyday streets can become functioning ecological systems. In Fredericton, an Urban Forest Management Strategy established a long-term framework for expanding and diversifying the city's tree canopy, improving resilience to climate change and supporting urban wildlife habitat. The Saint-Laurent Biodiversity Corridor in Montreal demonstrates how ecological connectivity can be woven through a densely urbanized landscape, linking green spaces, riparian areas, and community parks into a functioning corridor for species movement and ecosystem recovery.</p> <p>The FSDS should extend its implementation strategies to encompass urban suburban, agricultural, and industrial landscapes, and recognize planning and design professionals as essential partners in biodiversity protection and restoration across all landscapes.</p>
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The CSLA is committed to working in partnership with the Government of Canada to advance sustainable development across all of Canada's landscapes. Our members are already doing this work by integrating nature-based solutions, climate resilience, and ecological restoration into the places where Canadians live, work, and move.

We urge the Government of Canada to strengthen the final 2026–2029 Federal Sustainable Development Strategy by recognizing that sustainability must be mainstreamed across all landscapes, not only remote or protected ones; by establishing requirements rather than promoting voluntary actions; and by formally engaging planning and design professionals (i.e., landscape architects, planners, architects, and engineers) as implementation partners in the goals and strategies that will shape Canada's communities for decades to come.

The CSLA welcomes the opportunity to further discuss these recommendations and looks forward to continuing to contribute to a sustainable future for all.

The CSLA is a non-profit professional organization dedicated to advancing the art, science, and practice of landscape architecture in Canada. Representing over 3,200 landscape architects, associates, interns, and students, the CSLA advocates for sustainable and socially just communities, climate change adaptation, nature-based solutions, ecological restoration and enhancement, and the preservation of cultural landscapes.