

# Fall 2015

# Reports of the Commissioner of the Environment and Sustainable Development

## **REPORT 3**

Departmental Progress in Implementing Sustainable Development Strategies



Office of the Auditor General of Canada

#### Performance audit reports

This report presents the results of a performance audit conducted by the Office of the Auditor General of Canada under the authority of the *Auditor General Act*.

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- gather the evidence necessary to assess performance against the criteria,
- report both positive and negative findings,
- · conclude against the established audit objectives, and
- make recommendations for improvement when there are significant differences between criteria and assessed performance.

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Production of our Fall 2015 reports was completed before the government announced changes to names of some departments. The name Environment Canada was changed to Environment and Climate Change Canada. There was no impact to our audit work and findings.

# Introduction

## Background

Strategic environmental assessment	3.1 In 1990, Cabinet issued a directive requiring departments and agencies to conduct a strategic environmental assessment of policy and program proposals when the following two conditions were met:
	<ul> <li>a policy or program proposal is submitted to an individual minister or to Cabinet for approval; and</li> </ul>
	• implementation of the proposal may result in important <b>environmental effects</b> , either positive or negative.
	In 1999, the directive was expanded to include plan proposals, and guidelines were added to help departments and agencies conduct strategic environmental assessments.
Sustainable development strategies	3.2 Since 1995, most large departments and agencies have been required by law to prepare sustainable development strategies and present them to Parliament. The strategies are meant to be an important means of driving responsible management, from an environmental and sustainable development perspective, throughout the federal government. These strategies should contain their own objectives and plans that will contribute to the overall goal of furthering <b>sustainable development</b> .
	3.3 In 2008, the <i>Federal Sustainable Development Act</i> was passed, requiring a Federal Sustainable Development Strategy (FSDS) to be developed every three years. The purpose of the FSDS is to make environmental decision making more transparent and accountable to Parliament. This is done by providing a government-wide perspective on environmental priorities, and by setting goals, targets, and implementation strategies.
	<b>Environmental effect</b> —Any change that the policy, plan or program may cause in the environment, including any effect of any such change on health and socio-economic conditions, on physical and cultural heritage, on the current use of lands and resources for traditional purposes by Aboriginal persons, or on any structure, site or thing that is of historical, archaeological, paleontological or architectural significance. These changes can occur within or outside Canada.
	Source: Strategic Environmental Assessment: The Cabinet Directive on the Environmental

Source: Federal Sustainable Development Act

Assessment of Policy, Plan and Program Proposals: Guidelines for Implementing the Cabinet Directive, 2010.

**Sustainable development**—Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

3.4 In 2010, the federal government released its first FSDS, creating two levels of sustainable development strategies in the government: the departmental; and the higher-level, government-wide FSDS. Today, 26 large departments and agencies are required to develop departmental sustainable development strategies and also to contribute to the FSDS.

3.5 The 2010 FSDS made a commitment to strengthen the application of strategic environmental assessments. That same year, the guidelines supporting the Cabinet directive were updated, requiring departments and agencies to

- consider FSDS goals and targets when undertaking strategic environmental assessments,
- report publicly on the extent and results of their strategic environmental assessment practices, and
- describe the link to FSDS goals and targets in their public statements about their strategic environmental assessments.

3.6 To strengthen the application of the Cabinet directive, Environment Canada encouraged departments and agencies to highlight their strategic environmental assessment processes and their planned internal activities and commitments related to updating these processes. Many departments and agencies responded by including specific commitments in their departmental sustainable development strategies for the 2011–12 fiscal year.

Why we did this audit

3.7 The Commissioner of the Environment and Sustainable Development (the Commissioner) is required under section 23 of the *Auditor General Act* to report on the government's progress toward sustainable development. The Commissioner must also monitor and report annually on how well departments and agencies have met their objectives and implemented the plans set out in their departmental sustainable development strategies. This includes their contribution to meeting the targets outlined in the FSDS.

3.8 In 2013, to fulfill this statutory requirement, the Commissioner developed a six-year strategy that would cover all 26 departments and agencies required to contribute to the FSDS. This strategy focuses on departments' and agencies' application of the Cabinet directive and its related guidelines. It also focuses on their progress in meeting their commitments to strengthen their strategic environmental assessment practices.

Commissioner's past audit work 3.9 This is the Commissioner's third annual report on strategic environmental assessment practices. The 2013 report focused on whether five selected departments had met their specific commitments to update their internal guidance on their strategic environmental assessment practices and to report on them. The audit concluded that three of the five departments had made satisfactory progress.

3.10 The 2014 report had two focuses. The first was to determine whether five departments (different from those audited in 2013) had systems in place to help ensure compliance with key aspects of the Cabinet directive and its related guidelines. The second focus was to determine whether those departments had met their 2011–12 departmental commitments related to strengthening strategic environmental assessment practices. The audit found that, except for proposals sent to individual ministers, four of the five departments had systems in place to apply the Cabinet directive and its related guidelines. However, the audit did not examine the effectiveness of those systems. The audit concluded that four of the five departments had made satisfactory progress against their 2011–12 commitments to strengthen their strategic environmental assessment practices.

## Focus of the audit

3.11 This audit was focused on results, examining whether Agriculture and Agri-Food Canada, the Canada Revenue Agency, Canadian Heritage, and Fisheries and Oceans Canada adequately

- applied the Cabinet directive and its related guidelines to policy, plan, and program proposals submitted for approval to an individual minister or to Cabinet, including the Treasury Board;
- reported on the extent and results of their strategic environmental assessment practices as required by the Cabinet directive and its related guidelines; and
- met their departmental sustainable development strategy commitments to strengthen their strategic environmental assessment practices, as stated in their 2011–12 reports on plans and priorities.

3.12 This audit is important because the government needs relevant information on environmental, economic, and social factors to make informed decisions that support sustainable development. This is particularly important for ministers of federal departments, whose decisions on government policies, plans, and programs can significantly affect Canada's economy, society, and environment. It is also important for stakeholders and the public to be assured that ministers receive information about potential important environmental effects when making decisions.

3.13 We did not examine the progress made by the entities toward Federal Sustainable Development Strategy goals and targets other than their commitments to strengthen the application of strategic environmental assessment practices. Also, we did not carry out a detailed examination of the quality of the analysis included in each completed detailed strategic environmental assessment.

3.14 More details about the audit objectives, scope, approach, and criteria are in **About the Audit** at the end of this report (see pages 22–25).

# Findings, Recommendations, and Responses

## Applying the Cabinet directive

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#### Overall finding

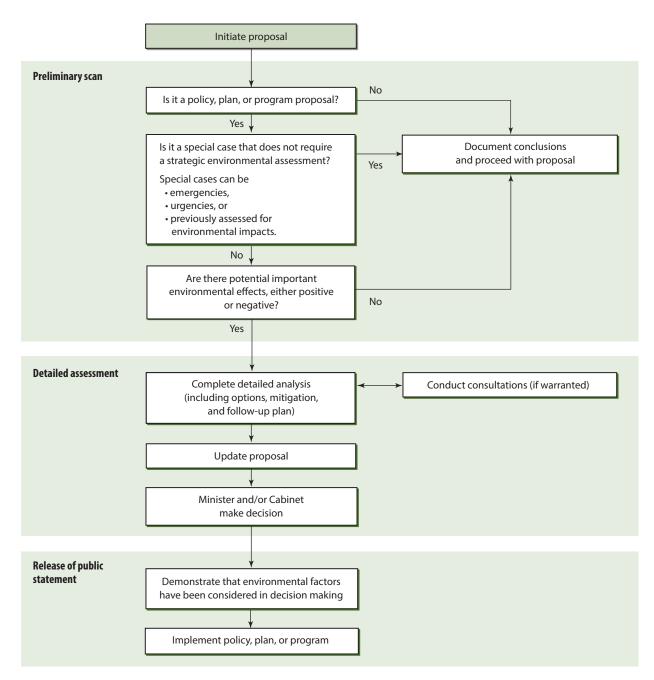
3.15 Overall, we found that ministers were not provided with information about potential important environmental effects for the majority of the proposals submitted to them. For example, Canadian Heritage could not provide evidence that it applied the Cabinet directive and related guidelines, as was required, to any of its 109 policy, plan, or program proposals.

3.16 We also found that about half of the preliminary scans that we sampled did not meet the selected requirements of the Cabinet directive. For example, the Cabinet directive requires an assessment of important environmental effects (both positive and negative) of proposals that will be submitted to ministers. We noted that, in Canada Revenue Agency's assessment of the environmental effects of converting approximately 180,000 corporate tax clients from paper to electronic filing, it concluded that the overall impact was negligible. We found, however, that this initiative had a potential important positive environmental effect of saving approximately 28 million sheets of paper annually.

3.17 This is important because ministers need to receive complete information on the potential important environmental effects of the proposals they are considering for approval.

## Context 3.18 The Cabinet directive and its related guidelines require departments and agencies to conduct a strategic environmental assessment when the following two conditions are met: • a policy, plan, or program proposal is submitted to an individual minister or to Cabinet for approval; and • implementation of the proposal may result in important environmental effects, either positive or negative. 3.19 The guidelines recognize that there may be special cases for which no strategic environmental assessment is required: • when proposals are prepared in response to a clear and immediate emergency; • when the matter is urgent and the normal process of Cabinet consideration is shortened; and • when issues have been previously assessed for their environmental impacts. 3.20 Although the Cabinet directive and its related guidelines give departments and agencies flexibility when they are developing a process suited to their own situations, the guidelines set out a multi-step process for systematically analyzing and documenting strategic environmental assessments (Exhibit 3.1). In assessing proposals for potential important environmental effects, 3.21 departments and agencies are required to • begin assessments early in the conceptual planning stages of the proposal, before irreversible decisions are made; • assess proposals for potential important positive and negative environmental effects; • consider how the proposal could affect the goals and targets of the Federal Sustainable Development Strategy (FSDS); and • properly integrate environmental considerations into the development of proposals.

#### Exhibit 3.1 Steps to apply the Cabinet directive and its related guidelines to proposals



# Ministers were not provided with information about potential important environmental effects of policy, plan, or program proposals

What we found	3.22 We found that, in the majority of cases, ministers were not provided with information about potential important environmental effects of policy, plan, and program proposals. This occurred because either the proposals were not assessed or the entities could not provide evidence that they were assessed for potential important environmental effects as required by the Cabinet directive. For example, Canadian Heritage could not provide evidence that it applied the Cabinet directive and related guidelines to any of its 109 policy, plan, or program proposals.
	3.23 Our analysis supporting this finding presents what we examined and discusses
	• application of the Cabinet directive.
Why this finding matters	3.24 This finding matters because ministers need to have information at a strategic level about the potential important environmental effects of each decision they are making. Decision makers, when they know about the potential environmental effects of government policies, plans, or programs before they are implemented, can anticipate, prevent, or mitigate any potential negative environmental effects and enhance any environmental benefits. In addition, this finding matters because it supports the overall goal of the <i>Federal Sustainable Development Act</i> — making environmental decision making more transparent and accountable.
Recommendation	3.25 Our recommendation in this area of examination appears at paragraph 3.31.
Analysis to support this finding	3.26 What we examined. We asked each of the four selected entities to provide a list of its policy, plan, and program proposals submitted for approval to an individual minister or Cabinet for the period 1 January 2011 to 31 December 2014. We then reviewed other sources of information, such as departmental press releases, to gauge the completeness of these lists. We also asked for a list of preliminary scans and detailed strategic environmental assessments that were conducted over the same period.
	3.27 We then compared the lists of proposals with the lists of preliminary scans and detailed strategic environmental assessments to see whether a scan or detailed strategic environmental assessment was completed for each proposal.

3.28 **Application of the Cabinet directive.** We found that the four entities did not, as was required, apply the Cabinet directive to the majority of their policy, plan, and program proposals submitted to ministers during the period 2011 to 2014 (Exhibit 3.2). For example, Canadian Heritage could not provide evidence that it had applied the Cabinet directive and related guidelines to any of its proposals. This included its 2013 proposal concerning the 2015 Pan American and Parapan American Games; no information about potential important environmental effects was provided in support of the proposal. We noted, however, that Canadian Heritage had applied the Cabinet directive and carried out a detailed strategic environmental assessment for a similar proposal for the 2010 Winter Olympic Games. As a result of Canadian Heritage's non-compliance with the directive, neither its responsible minister nor the Cabinet was appropriately informed of the potential important environmental effects of the 2013 proposal.

Exhibit 3.2 Government entities did not apply the Cabinet directive to the majority of proposals
between 2011 and 2014

	Proposals submitted to individual minister		Proposals submitted to Cabinet <sup>1</sup>	
Entity	Number of proposals	Cabinet directive applied	Number of proposals	Cabinet directive applied
Agriculture and Agri-Food Canada	1,024	1	74	50
Canada Revenue Agency	84	4	19	5
Canadian Heritage	109	0	85	0
Fisheries and Oceans Canada	488	0	72	55

<sup>1</sup> Proposals submitted to Cabinet include submissions to Treasury Board.

3.29 We also found that Agriculture and Agri-Food Canada agreed to transfer up to 60 acres of land—designated as cultural heritage and of historical importance—for the purposes of building a new hospital. This was done without applying the Cabinet directive.

3.30 Lastly, we found that none of the entities maintained formal lists of the policy, plan, or program proposals that were submitted to their ministers and that required application of the Cabinet directive. The information was compiled by the entities in response to our request.

3.31 **Recommendation.** Agriculture and Agri-Food Canada, the Canada Revenue Agency, Canadian Heritage, and Fisheries and Oceans Canada should provide ministers with information on the potential important environmental effects of all their policy, plan, and program proposals as required by the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals and its related guidelines. Agriculture and Agri-Food Canada's response. Agreed. Agriculture and Agri-Food Canada (the Department) will formalize its internal review process to improve communication and tracking where policy, plans, and proposals going to the Minister for approval are subject to the Cabinet directive. The Department will take the necessary steps to review its strategic environmental assessment guidance documents and processes to ensure consistency with the Cabinet directive. The target date is 31 December 2015.

**The Canada Revenue Agency's response.** Agreed. The Canada Revenue Agency (the Agency) will develop a definition of "proposal" to apply the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals more consistently. The Agency will review and update its approval processes to ensure that all these proposals going to its Minister or to Cabinet are subject to a preliminary scan or comparable review in accordance with the Cabinet directive. These developments will be completed by June 2016.

The Agency will also conduct detailed strategic environmental assessments for all proposals where implementation may result in important environmental effects, either positive or negative, as determined by the proposals' preliminary scans.

**Canadian Heritage's response.** Agreed. Given its mandate, Canadian Heritage (the Department) develops few policies or proposals that engender environmental impact. To date, departmental process and documentation have inadequately captured the work done on strategic environmental assessments (SEAs). Canadian Heritage will ensure that SEAs are conducted consistently and fully documented in accordance with the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals. The Department will implement detailed guidelines on the SEA process, including analytical tools and reporting requirements in support of the Cabinet directive. Ministers will continue to be informed of the potential environmental effects of all policy, plan, and program proposals submitted for consideration.

**Fisheries and Oceans Canada's response.** Agreed. Fisheries and Oceans Canada (the Department) is taking the necessary steps to ensure that important environmental effects and considerations are integrated into policies, plans, and program proposals submitted to the Minister or to Cabinet for approval. The Department will review and revise, as required, its internal processes and guidance documents and will benchmark with other departments on their definition of "important" to ensure the Cabinet directive is being applied consistently. The implementation date is fall 2015.

# About half of the preliminary scans did not meet selected requirements of the Cabinet directive

What we found	3.32 When preliminary scans were carried out for proposals, we found that about half of the 34 scans we examined did not meet each of the requirements we selected for examination. For example, in its assessment of the effect of converting approximately 180,000 corporate tax clients from paper to electronic filing, the Canada Revenue Agency did not include the potential important positive environmental effects of its proposal. We found, however, that this initiative had a potential important positive environmental effect of saving approximately 28 million sheets of paper annually.
	3.33 In addition, we found that no detailed strategic environmental assessments were conducted after any of these 34 preliminary scans. In our view—based on our review of the information provided by the entities and on public information concerning these 34 proposals—the entities should have conducted detailed strategic environmental assessments for at least 14 of the 34 scans.
	3.34 Our analysis supporting this finding presents what we examined and discusses
	<ul> <li>compliance with selected requirements of the Cabinet directive and its related guidelines;</li> </ul>
	<ul> <li>appropriateness of conclusions on whether a detailed strategic environmental assessment should be conducted; and</li> </ul>
	• documentation of the timeliness of assessments.
Why this finding matters	3.35 This finding matters because ministers need to receive complete information about the potential important environmental effects of proposals they are considering. To be complete, assessments must both begin early and include a thorough analysis of environmental effects. Assessments that take place early in the life of a proposal, before permanent decisions are made, can help identify issues needing more attention or help in the analysis of alternative proposal options.
Recommendation	3.36 Our recommendation in this area of examination appears at paragraph 3.42.
Analysis to support this finding	3.37 <b>What we examined.</b> We examined a sample of 34 preliminary scans (of the 109 completed by the entities) to determine whether they met selected requirements in the Cabinet directive and its related guidelines.

3.38 **Compliance with selected requirements of the Cabinet directive and its related guidelines.** We found that about half of the 34 preliminary scans sampled did not assess potential important positive and negative environmental effects or consider linkages to FSDS goals and targets. We also found that the scope of the environmental assessments was not commensurate with the level of anticipated environmental effects in 74 percent of the sampled preliminary scans (Exhibit 3.3).

Exhibit 3.3 About half of the preliminary scans sampled did not meet the selected requirements of the Cabinet directive and its related guidelines

	Number and percentage of preliminary scans sampled that did not meet requirements <sup>1</sup>			
Selected requirements of the Cabinet directive and its related guidelines	Agriculture and Agri-Food Canada (8 scans)	Canada Revenue Agency (9 scans)	Fisheries and Oceans Canada (17 scans)	Total (34 scans)
Assessment of important environmental effects (both positive and negative)	3 (38%)	1 (11%)	14 (82%)	18 (53%)
Consideration of linkages to the Federal Sustainable Development Strategy's goals and targets	1 (13%)	4 (44%)	11 (65%)	16 (47%)
Scope of assessment is commensurate with the level of anticipated environmental effects	2 (25%)	9 (100%)	14 (82%)	25 (74%)

<sup>1</sup> Canadian Heritage was not included in this sample because it did not assess any of its proposals.

3.39 Appropriateness of conclusions on whether a detailed strategic environmental assessment should be conducted. Of the 34 preliminary scans that we examined, in our view, based on the entities' own documentation and on public information, detailed strategic environmental assessments should have been conducted for at least 14 of these scans, as follows:

- Agriculture and Agri-Food Canada (2 scans),
- Canada Revenue Agency (1 scan), and
- Fisheries and Oceans Canada (11 scans).

For example, Fisheries and Oceans Canada's preliminary scan concerning the Recreational Fisheries Conservation Partnerships Program identified important positive environmental effects that, according to the Cabinet directive, would require a detailed strategic environmental assessment. We found, however, that a detailed strategic environmental assessment was not carried out for this proposal. 3.40 Of the remaining 20 preliminary scans, we found that, for 8 scans, there was sufficient documentation to support the decision not to proceed to a detailed strategic environmental assessment; for 12 scans, however, there was not.

3.41 **Documentation of the timeliness of assessments.** The Cabinet directive requires that assessment begin early in the conceptual development stage of the proposals. For the purposes of our review, we defined "early" as during the first half of the life of the proposal. We found that the entities did not track the timeliness of assessments. Of the 34 scans that we examined, we found that 13 were assessed early. However, for the remaining 21, we could not determine whether the assessments were carried out in a timely manner because there was no documentation showing when the environmental assessment had begun (Exhibit 3.4).

Entity	Early assessment (out of 34 scans <sup>1</sup> )	Unable to determine timeliness (out of 34 scans <sup>1</sup> )		
Agriculture and Agri-Food Canada	8	0		
Canada Revenue Agency	4	5		
Fisheries and Oceans Canada	1	16		
Total	13	21		

Exhibit 3.4 The timeliness of most of the scans could not be determined due to lack of documentation

<sup>1</sup> Canadian Heritage was not included in this sample because it did not assess any of its proposals.

3.42 **Recommendation.** Agriculture and Agri-Food Canada, the Canada Revenue Agency, Canadian Heritage, and Fisheries and Oceans Canada should ensure that, when they assess proposals, the requirements of the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals and its related guidelines are met, or that rationales for exceptions are documented.

Agriculture and Agri-Food Canada's response. Agreed. Agriculture and Agri-Food Canada (the Department) will review and update guidance documents and processes to ensure that proposals will be assessed in accordance with the requirements of the Cabinet directive and its associated guidelines. The Department will develop procedures for inclusion in the departmental strategic environmental assessment guide that will document rationales for exceptions. The target date is 31 December 2015. **The Canada Revenue Agency's response.** Agreed. The Canada Revenue Agency will review and update its approval processes and revise its tools and templates to ensure compliance with the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals. The Canada Revenue Agency will also increase awareness of the Cabinet directive and its requirements among proposal developers. These developments will be completed by June 2016.

**Canadian Heritage's response.** Agreed. While Canadian Heritage has not consistently documented its work on strategic environmental assessments (SEAs), it will continue to ensure that all policy, plan, and program proposals are appropriately assessed and ensure that this work is documented in line with the requirements of the Cabinet directive. Canadian Heritage will implement detailed guidelines on the SEA process, including analytical tools and reporting requirements.

**Fisheries and Oceans Canada's response.** Agreed. Fisheries and Oceans Canada has reviewed and revised its strategic decision-making processes to ensure a consistent and documented approach is used when assessing policy, plan, and program proposals. This approach supports departmental accountability in its strategic environmental assessment process and compliance with the requirements of the Cabinet directive. The implementation date is fall 2015.

## **Reporting publicly**

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**Overall finding** 

3.43 Overall, we found that none of the entities met the requirements for public reporting on the extent and results of their strategic environmental assessment practices, as set out in the Cabinet directive and its related guidelines. For example, their reporting did not describe how their policy, plan, and program proposals that were subject to a strategic environmental assessment had affected, or were expected to have affected, progress toward Federal Sustainable Development Strategy (FSDS) goals and targets, as required.

3.44 We also found that Fisheries and Oceans Canada had carried out six detailed strategic environmental assessments. However, it issued the required public statement for only one of these six detailed assessments.

3.45 This is important because departments and agencies are required to report publicly on the extent and results of their strategic environmental assessment practices. Public reporting helps to demonstrate to stakeholders and the public that departments and agencies do consider the environmental effects of proposals and that the environmental decision-making process is open and accountable.

## **Context** 3.46 The Cabinet directive and its related guidelines require departments and agencies to report publicly in two distinct ways. First, they have to report on the extent and results of their strategic environmental assessment practices in their reports on plans and priorities (RPPs) and their departmental performance reports (DPRs). This reporting also has to describe how the policy, plan, and program proposals that are subject to a strategic environmental assessment have affected progress toward FSDS goals and targets.

3.47 Second, for any policy, plan, or program that is approved or announced, departments and agencies are required to prepare a public statement of environmental effects when a detailed strategic environmental assessment has been conducted. Departments and agencies determine the content of the public statement.

# Public reporting on the extent and results of strategic environmental assessment practices did not comply with the Cabinet directive and its related guidelines

What we found	3.48 We found that none of the entities complied with the Cabinet directive and its related guidelines on reporting on the extent and results of their strategic environmental assessment practices. For example, none of the entities' RPPs or DPRs included a description of how their policy, plan, and program proposals that were subject to strategic environmental assessments had affected or were expected to have affected progress toward FSDS goals and targets.
	3.49 Our analysis supporting this finding presents what we examined and discusses
	<ul> <li>reporting in RPPs and DPRs, and</li> </ul>
	<ul> <li>reporting on progress toward FSDS goals.</li> </ul>
Why this finding matters	3.50 This finding matters because the Cabinet directive and its related guidelines require departments and agencies to report publicly on the extent and results of their strategic environmental assessment practices.
	<b>Reports on plans and priorities (RPPs)</b> —Individual expenditure plans for each department and agency. These reports provide details on an organization's main priorities, plans, and expected performance over a three-year period. Reports for the next fiscal year are normally tabled in Parliament on or before 31 March.
	Source: Adapted from definitions from the Treasury Board of Canada Secretariat
	<b>Departmental performance reports (DPRs)</b> —Individual department and agency accounts of results achieved against performance expectations as set out in the relevant reports on plans and priorities. The reports cover the most recent fiscal year and are normally tabled in Parliament in the fall.

Public reporting helps demonstrate to stakeholders that departments and agencies are considering the environmental effects of proposals and that their environmental decision-making process is open and accountable.

#### Recommendation

finding

Analysis to support this

3.51 Our recommendation in this area of examination appears at paragraph 3.55.

3.52 What we examined. We reviewed the departmental and agency RPPs and DPRs for the years 2011–2014 to assess whether their reporting complied with the Cabinet directive and its related guidelines.

3.53 **Reporting in RPPs and DPRs.** We found that none of the four entities examined (with one exception noted below) had reported specific information on the extent and results of their strategic environmental assessment practices in their RPPs or DPRs. For example, none of the entities had reported on the number of preliminary scans or detailed strategic environmental assessments that they had completed during the period 2011–2014. The one exception was Agriculture and Agri-Food Canada's reporting in the 2011–12 and 2012–13 fiscal years on the percentage of its policy, plan, and program proposals to which the Cabinet directive was applied and that required a preliminary scan.

3.54 **Reporting on progress toward FSDS goals.** None of the entities' reporting included a description of how their policy, plan, and program proposals subject to a strategic environmental assessment had affected, or were expected to have affected, progress toward FSDS goals and targets.

3.55 **Recommendation.** Agriculture and Agri-Food Canada, the Canada Revenue Agency, Canadian Heritage, and Fisheries and Oceans Canada should report on the extent and results of their strategic environmental assessment practices as required by the Cabinet directive and its related guidelines.

Agriculture and Agri-Food Canada's response. Agreed. The extent and results of strategic environmental assessment practices will be reported in the departmental sustainable development strategies, supplementary to its Report on Plans and Priorities and departmental performance reports. The target date is December 2015 (aligned with the tabling of the 2015–16 Departmental Performance Report).

**The Canada Revenue Agency's response.** Agreed. The Canada Revenue Agency will report publicly on its preliminary scans and strategic environmental assessments through its annual Departmental Performance Report, in accordance with the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals. This will be implemented beginning with the 2015–16 Departmental Performance Report. For proposals requiring detailed strategic environmental assessments, public reporting will also be done through stand-alone public statements. **Canadian Heritage's response.** Agreed. Canadian Heritage will report on the extent and results of its strategic environmental assessment practices in its reports on plans and priorities, and departmental performance reports, in accordance with Treasury Board of Canada Secretariat guidelines and templates.

**Fisheries and Oceans Canada's response.** Agreed. Fisheries and Oceans Canada will report publicly on the extent and results of strategic environmental assessment practices in its Report on Plans and Priorities, and Departmental Performance Report, in accordance with the Cabinet directive and related guidelines. In addition, Fisheries and Oceans Canada will improve its reporting on progress towards Federal Sustainable Development Strategy goals and targets within its internal processes, tools, and documentation. The implementation date is fall 2015.

#### Public statements were not prepared

What we found	3.56 We found that Fisheries and Oceans Canada carried out six detailed strategic environmental assessments. However, it issued a public statement for only one of these detailed strategic environmental assessments.
	3.57 Our analysis supporting this finding presents what we examined and discusses
	• issuance of public statements after detailed strategic environmental assessments.
Why this finding matters	3.58 This finding matters because public statements help to make environmental decision making by government open and accountable.
Recommendation	3.59 Our recommendation in this area of examination appears at paragraph 3.63.
Analysis to support this finding	3.60 <b>What we examined.</b> When entities had completed a detailed strategic environmental assessment, we verified whether a public statement was issued.
	3.61 <b>Issuance of public statements after detailed strategic</b> <b>environmental assessments.</b> We found that one of the four entities, Fisheries and Oceans Canada, had completed six detailed strategic environmental assessments. Therefore, according to the Cabinet directive and its related guidelines, Fisheries and Oceans Canada should have issued six public statements of environmental effects, including the impacts on FSDS goals and targets. We found, however, that it issued only one public statement (about amendments to the <i>Fisheries Act</i> ).

3.62 As mentioned in paragraph 3.39, in our view, additional detailed strategic environmental assessments should have been carried out by Agriculture and Agri-Food Canada, the Canada Revenue Agency, and Fisheries and Oceans Canada, and the required public statements issued. Moreover, as mentioned in paragraph 3.28, Canadian Heritage's proposal concerning the 2015 Pan American and Parapan American Games did not include a detailed strategic environmental assessment that would have required a public statement of its findings.

3.63 **Recommendation.** Fisheries and Oceans Canada should issue a public statement for all announced or approved proposals as required by the Cabinet directive and its related guidelines.

**Fisheries and Oceans Canada's response.** Agreed. Fisheries and Oceans Canada will publicly report on detailed strategic environmental assessments conducted for all announced or approved proposals by issuing public statements on its website. The implementation date is fall 2015.

## **Meeting commitments**

None of the entities made satisfactory progress in meeting their commitments to strengthen their strategic environmental assessment practices

Overall finding 🔶	3.64 Overall, we found that none of the four entities examined had made satisfactory progress in meeting their departmental sustainable development strategy commitments to strengthen their strategic environmental assessment practices.
	3.65 This is important because strong strategic environmental assessment practices that comply with the Cabinet directive and its related guidelines are needed to make sure the government is considering the environment in its decision making. Moreover, when departments and agencies follow through on what they said they would do, it shows departmental commitment to the government-wide Federal Sustainable Development Strategy (FSDS) goal of strengthening strategic environmental assessment practices.
	3.66 Our analysis supporting this finding presents what we examined and discusses
	• progress made on commitments to strengthen strategic environmental assessment practices.
Context	3.67 To strengthen the application of the Cabinet directive, in October 2010, Environment Canada released a guidance document that encouraged departments and agencies to highlight their strategic environmental assessment processes and their planned internal activities and commitments related to updating these processes.

#### 3.68 We made no recommendations in this area of examination.

#### Recommendations

Analysis to support this3.69 What we examined. We examined whether the entities had madefindingprogress against their 2011–12 commitments to strengthen their strategic<br/>environmental assessment practices.

3.70 **Progress made on commitments to strengthen strategic environmental assessment practices.** We found that none of the entities had made satisfactory progress in this regard (Exhibit 3.5). As a result, they had not contributed to supporting the government-wide commitment to strengthen the application of the Cabinet directive on strategic environmental assessment.

# Exhibit 3.5 None of the entities made satisfactory progress in meeting their commitments in the 2011–12 fiscal year related to strengthening their strategic environmental assessment practices

Entity	2011–12 departmental sustainable development strategy commitments	Commissioner of the Environment and Sustainable Development findings of implementation of commitments	Commissioner's assessment of overall progress	
Agriculture and Agri-Food Canada	<ul> <li>Applying the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals, also known as strategic environmental assessment (SEA), to help ensure that environmental considerations are taken into account in Agriculture and Agri-Food Canada's (the Department's) decision making; and</li> </ul>	<ul> <li>Commitment not met:</li> <li>Between 2011 and 2014, the Department applied the Cabinet directive and related guidelines, as was required, to only 1 of its proposals to its Minister.</li> <li>Between 2011 and 2014, the Department did not apply the Cabinet directive and related guidelines to 24 of its 74 proposals sent to Cabinet.</li> <li>The Department did not consider linkages to FSDS targets in 13% of scans we examined; missed important environmental effects in 38% of scans; and the level of assessment of environmental effects was not commensurate with the level of anticipated environmental effects in 25% of the sampled scans.</li> </ul>	Unsatisfactory	
Satisfactory: The entity has made adequate progress against its commitments. This result does not mean that no further work is required.         Unsatisfactory: The entity has not made adequate progress against its commitments. This result means that further work is required.				

Exhibit 3.5 None of the entities made satisfactory progress in meeting their commitments in the 2011–12 fiscal year related to strengthening their strategic environmental assessment practices (continued)

Agriculture and Agri-Food Canada (continued)• Ensuring that the SEA process incorporates the goals as laid out in the Federal Sustainable Development Strategy (FSDS), and that SEA reporting requirements are met, in accordance with the revised Guidelines for Implementing the Cabinet Directive.Commitment not met: • In 2012, the Department updated its SEA template. In 2014, it updated its SEA internal guidance. We found that these tools make references to the Department's FSDS goals and targets of the government. • With the exception of reporting in the 2011–12 and 2012–13 fiscal years, the Department did not report on the extent and results of its SEA practices.UnsatisfactoryCanada Revenue Agency• Given its administrative mandate, the Canada Revenue Agency (the Agency ull conduct SEAs, with the support of the Canadian Environmental Assessment Agency.Commitment not met: • Between 2011 and 2014, the Agency applied the Cabinet directive and related guidelines, as was required, to only 4 of its 84 proposals to its Minister.Unsatisfactory• Between 2011 and 2014, the Agency did not apply the Cabinet directive and related guidelines to 14 of its 19 proposals sent to Cabinet, as required.• Unsatisfactory• The Agency did not consider linkages to FSDS targets in 44% of the scans we examined.• The Agency did not consider linkages to FSDS targets in 44% of the scans we examined.• Unsatisfactory	Entity	2011–12 departmental sustainable development strategy commitments	Commissioner of the Environment and Sustainable Development findings of implementation of commitments	Commissioner's assessment of overall progress
Revenue Agencymandate, the Canada Revenue Agency (the Agency) has not conducted SEAs to date. If required, the Agency will conduct SEAs, with the support of the Canadian Environmental Assessment Agency.• Between 2011 and 2014, the Agency applied the Cabinet directive and related guidelines, as was required, to only 4 of its 84 proposals to its Minister.• Between 2011 and 2014, the Agency did not apply the Cabinet directive and related guidelines to 14 of its 19 proposals sent to Cabinet, as required.• Between 2011 and 2014, the Agency did not apply the Cabinet directive and related guidelines to 14 of its 	and Agri-Food Canada	process incorporates the government's environmental goals as laid out in the Federal Sustainable Development Strategy (FSDS), and that SEA reporting requirements are met, in accordance with the revised Guidelines for Implementing the Cabinet	<ul> <li>In 2012, the Department updated its SEA template. In 2014, it updated its SEA internal guidance. We found that these tools make references to the Department's FSDS goals and targets but not to the overall FSDS goals and targets of the government.</li> <li>With the exception of reporting in the 2011–12 and 2012–13 fiscal years, the Department did not report on the</li> </ul>	Unsatisfactory
anticipated environmental effects in 100% of the sampled scans.	Revenue	mandate, the Canada Revenue Agency (the Agency) has not conducted SEAs to date. If required, the Agency will conduct SEAs, with the support of the Canadian Environmental	<ul> <li>Between 2011 and 2014, the Agency applied the Cabinet directive and related guidelines, as was required, to only 4 of its 84 proposals to its Minister.</li> <li>Between 2011 and 2014, the Agency did not apply the Cabinet directive and related guidelines to 14 of its 19 proposals sent to Cabinet, as required.</li> <li>The Agency did not identify potential important positive environmental effects of 1 of the proposals we examined.</li> <li>The Agency did not consider linkages to FSDS targets in 44% of the scans we examined; missed important environmental effects in 11% of scans; and the level of its assessment of environmental effects was not commensurate with the level of anticipated environmental effects in 11%</li> </ul>	Unsatisfactory

Unsatisfactory: The entity has not made adequate progress against its commitments. This result means that further work is required.

Exhibit 3.5 None of the entities made satisfactory progress in meeting their commitments in the 2011–12 fiscal year related to strengthening their strategic environmental assessment practices (continued)

Entity	2011–12 departmental sustainable development strategy commitments	Commissioner of the Environment and Sustainable Development findings of implementation of commitments	Commissioner's assessment of overall progress
Canadian Heritage	<ul> <li>Strengthening the application of SEAs by ensuring that the government's environmental goals are taken into account when pursuing social and economic goals; and</li> <li>Pursuing best practices on reporting on summary information on the results of SEAs linked to the FSDS goals and targets, in order to ensure that environmental decision making is more transparent.</li> </ul>	<ul> <li>Commitment not met:</li> <li>Between 2011 and 2014, Canadian Heritage (the Department) did not apply the Cabinet directive and related guidelines, as was required, to any of its proposals going to its Minister or Cabinet.</li> <li>The Department's guidance and strategic environmental assessment tools remain in draft form.</li> <li>Commitment not met:</li> <li>The Department did not report on the extent and results of its SEA practices.</li> <li>The Department did not prepare any public statements.</li> </ul>	Unsatisfactory
Fisheries and Oceans Canada	<ul> <li>Fisheries and Oceans Canada (the Department) commits to making environmental decision making more transparent and to ensuring that the government's environmental goals are taken into account when pursuing social and economic goals; and</li> </ul>	<ul> <li>Commitment not met:</li> <li>Between 2011 and 2014, the Department did not apply the Cabinet directive and related guidelines, as was required, to any of its proposals to its Minister.</li> <li>Between 2011 and 2014, the Department did not apply the Cabinet directive and related guidelines to 17 of its 72 proposals sent to Cabinet.</li> <li>The Department did not consider linkages to FSDS targets in 65% of the scans we examined; missed important environmental effects in 82% of scans; and the level of assessment of environmental effects was not commensurate with the level of anticipated environmental effects in 82% of the sampled scans.</li> <li>The Department did not report on the extent and results of its SEA practices.</li> <li>The Department prepared only one of six required public statements.</li> </ul>	Unsatisfactory

Exhibit 3.5 None of the entities made satisfactory progress in meeting their commitments in the 2011–12 fiscal year related to strengthening their strategic environmental assessment practices (continued)

Entity	2011–12 departmental sustainable development strategy commitments	Commissioner of the Environment and Sustainable Development findings of implementation of commitments	Commissioner's assessment of overall progress
Fisheries and Oceans Canada (continued)	• The Department will review and update its internal operational guidance and supporting processes and tools for strategic environmental assessment to align with the FSDS and the recently revised Guidelines for Implementing the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals.	Commitment not met: • The Department's guidance and SEA tools remain in draft form.	Unsatisfactory
Satisfactory: The er	ntity has made adequate progress against	its commitments. This result does not mean that no	further work is required.

Unsatisfactory: The entity has not made adequate progress against its commitments. This result means that further work is required.

# Conclusion

3.71 We concluded that Agriculture and Agri-Food Canada, the Canada Revenue Agency, Canadian Heritage, and Fisheries and Oceans Canada did not adequately apply the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals and its related guidelines to policy, plan, and program proposals submitted for approval to an individual minister or Cabinet, including the Treasury Board.

3.72 We also concluded that these four federal entities did not report adequately on the extent and results of their strategic environmental assessment practices as required by the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals and its related guidelines.

3.73 In addition, we concluded that these four federal entities did not make satisfactory progress in meeting their departmental sustainable development strategy commitments to strengthen their strategic environmental assessment practices, as stated in their 2011–12 reports on plans and priorities.

# **About the Audit**

The Office of the Auditor General's responsibility was to conduct an independent examination of sustainable development strategies to provide objective information, advice, and assurance to assist Parliament in its scrutiny of the government's management of resources and programs.

All of the audit work in this report was conducted in accordance with the standards for assurance engagements set out by the Chartered Professional Accountants of Canada (CPA) in the CPA Canada Handbook—Assurance. While the Office adopts these standards as the minimum requirement for our audits, we also draw upon the standards and practices of other disciplines.

As part of our regular audit process, we obtained management's confirmation that the findings in this report are factually based.

### **Objectives**

The entities included in this audit are Agriculture and Agri-Food Canada, the Canada Revenue Agency, Canadian Heritage, and Fisheries and Oceans Canada. The objectives of the audit were to determine whether the selected federal departments and agency adequately

- applied the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals and its related guidelines to policy, plan, and program proposals submitted for approval to an individual minister or Cabinet, including the Treasury Board;
- reported on the extent and results of their strategic environmental assessment practices as required by the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals and its related guidelines; and
- met their departmental sustainable development strategy commitments to strengthen their strategic environmental assessment practices, as stated in their 2011–12 reports on plans and priorities.

### Scope and approach

The audit examined the progress made by Agriculture and Agri-Food Canada, the Canada Revenue Agency, Canadian Heritage, and Fisheries and Oceans Canada to strengthen their strategic environmental assessment practices as presented in their commitments in their 2011–12 reports on plans and priorities. The audit also examined whether the entities applied the Cabinet directive and its related guidelines as required to policy, plan, and program proposals prepared between January 2011 and December 2014. This included the required public reporting on the extent and results of their strategic environmental assessment practices and the preparation of public statements for each approved or announced proposal for which a detailed strategic environmental assessment had been completed.

The audit involved reviewing and analyzing key documents, interviewing Department and Agency officials, and testing a sample of transactions (that is, proposals, preliminary scans, detailed strategic environmental assessments, and related documentation).

## Criteria

Criteria	Sources
<ul> <li>its related guidelines to policy, plan, and program p minister or Cabinet, including the Treasury Board;</li> <li>reported on the extent and results of their strategic</li> </ul>	Assessment of Policy, Plan and Program Proposals and roposals submitted for approval to an individual environmental assessment practices as required by the c of Policy, Plan and Program Proposals and its related trategy commitments to strengthen their strategic
The selected federal entities contribute, through a commitment in their departmental sustainable development strategies, as stated in their 2011–12 reports on plans and priorities, to the government-wide Federal Sustainable Development Strategy commitment to strengthen the application of the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals and its related guidelines.	<ul> <li>Federal Sustainable Development Act</li> <li>Departmental sustainable development strategy commitments (as stated in 2011–12 reports on plans and priorities)</li> <li>Planning for a Sustainable Future: A Federal Sustainable Development Strategy for Canada, Sustainable Development Office, Environment Canada, 2010</li> <li>Planning for a Sustainable Future: A Federal Sustainable Development Strategy for Canada 2013–2016, Sustainable Development Office, Environment Canada, 2013</li> <li>Guidance for the Department Website Component of Sustainable Development and Strategic Environmental Assessment Reporting in the 2011–12 Report on Plans and Priorities, Sustainable Development Office, Environment Canada, 2010</li> <li>Sustainable Development Office Guidance for the Website Component of the 2011–12 Performance Report on the Departmental Sustainable Development Office, Environment Canada, 2010</li> </ul>
Policy, plan, or program proposals submitted for approval to an individual minister or Cabinet are assessed in accordance with the Cabinet directive and its related guidelines for the potential for important environmental effects, either positive or negative.	<ul> <li>Strategic Environmental Assessment: The Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals: Guidelines for Implementing the Cabinet Directive, Privy Council Office and Canadian Environmental Assessment Agency, 2010</li> </ul>
Policy, plan, or program proposals submitted for approval to an individual minister or Cabinet are assessed for environmental considerations early in the conceptual planning stage of the proposal.	<ul> <li>Strategic Environmental Assessment: The Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals: Guidelines for Implementing the Cabinet Directive, Privy Council Office and Canadian Environmental Assessment Agency, 2010</li> </ul>

Criteria	Sources
We used the following criteria to determine whether t	ne selected federal organizations adequately
its related guidelines to policy, plan, and program p minister or Cabinet, including the Treasury Board;	
	environmental assessment practices as required by the of Policy, Plan and Program Proposals and its related
<ul> <li>met their departmental sustainable development st environmental assessment practices, as stated in the</li> </ul>	
	(continued)
When no assessment for potential important environmental effects is completed for a policy, plan, or program proposal submitted for approval to an individual minister or Cabinet, the rationale for not assessing is documented.	<ul> <li>Strategic Environmental Assessment: The Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals: Guidelines for Implementing the Cabinet Directive, Privy Council Office and Canadian Environmental Assessment Agency, 2010</li> </ul>
The selected federal entities conclude appropriately on the need to complete a detailed strategic environmental assessment when assessing each policy, plan, and program proposal for potential important environmental effects. The phrase "conclude appropriately" means that	Strategic Environmental Assessment: The Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals: Guidelines for Implementing the Cabinet Directive, Privy Council Office and Canadian Environmental Assessment Agency, 2010
<ul> <li>the scope of the analysis undertaken was commensurate with the level of anticipated environmental effects;</li> </ul>	
<ul> <li>important environmental effects both positive or negative have been assessed; and</li> </ul>	
<ul> <li>linkages to the Federal Sustainable Development Strategy goals and targets have been made and documented, where applicable.</li> </ul>	
For each detailed strategic environmental assessment conducted, the selected federal entity prepares a public statement of environmental effects that includes impacts on the Federal Sustainable Development Strategy goals and targets.	<ul> <li>Strategic Environmental Assessment: The Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals: Guidelines for Implementing the Cabinet Directive, Privy Council Office and Canadian Environmental Assessment Agency, 2010</li> </ul>
The selected federal entities report on the extent and results of their strategic environmental assessment practices in their reports on plans and priorities and departmental performance reports.	<ul> <li>Strategic Environmental Assessment: The Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals: Guidelines for Implementing the Cabinet Directive, Privy Council Office and Canadian Environmental Assessment Agency, 2010</li> </ul>

Management reviewed and accepted the suitability of the criteria used in the audit.

### Period covered by the audit

The audit covered the period between January 2011 and December 2014. Audit work for this report was completed on 27 October 2015. The audit involved the examination of material from earlier periods, as required, to gather evidence to conclude against specific criteria.

### Audit team

Commissioner of the Environment and Sustainable Development: Julie Gelfand Principal: Joe Martire Lead Director: Kari Swarbrick Director: Leslie Levita

Hélène Charest Mark Lawrence Carolle Mathieu

# **List of Recommendations**

The following is a list of recommendations found in this report. The number in front of the recommendation indicates the paragraph where it appears in the report. The numbers in parentheses indicate the paragraphs where the topic is discussed.

Recommendation	Response
Applying the Cabinet directive	
<b>3.31</b> Agriculture and Agri-Food Canada, the Canada Revenue Agency, Canadian Heritage, and Fisheries and Oceans Canada should provide ministers with information on the potential important environmental effects of all their policy, plan, and program proposals as required by the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals and its related guidelines. (3.22–3.30)	Agriculture and Agri-Food Canada's response. Agreed. Agriculture and Agri-Food Canada (the Department) will formalize its internal review process to improve communication and tracking where policy, plans, and proposals going to the Minister for approval are subject to the Cabinet directive. The Department will take the necessary steps to review its strategic environmental assessment guidance documents and processes to ensure consistency with the Cabinet directive. The target date is 31 December 2015.
	<b>The Canada Revenue Agency's response.</b> Agreed. The Canada Revenue Agency (the Agency) will develop a definition of "proposal" to apply the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals more consistently. The Agency will review and update its approval processes to ensure that all these proposals going to its Minister or to Cabinet are subject to a preliminary scan or comparable review in accordance with the Cabinet directive. These developments will be completed by June 2016.
	The Agency will also conduct detailed strategic environmental assessments for all proposals where implementation may result in important environmental effects, either positive or negative, as determined by the proposals' preliminary scans.
	<b>Canadian Heritage's response.</b> Agreed. Given its mandate, Canadian Heritage (the Department) develops few policies or proposals that engender environmental impact. To date, departmental process and documentation have inadequately captured the work done on strategic environmental assessments (SEAs). Canadian Heritage will ensure that SEAs are conducted consistently and fully documented in accordance with the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals. The Department will implement detailed guidelines on the SEA process, including analytical tools and reporting requirements in support of the Cabinet directive. Ministers will continue to be informed of the potential environmental effects of all policy, plan, and program proposals submitted for consideration.

Recommendation	Response
	<b>Fisheries and Oceans Canada's response.</b> Agreed. Fisheries and Oceans Canada (the Department) is taking the necessary steps to ensure that important environmental effects and considerations are integrated into policies, plans, and program proposals submitted to the Minister or to Cabinet for approval. The Department will review and revise, as required, its internal processes and guidance documents and will benchmark with other departments on their definition of "important" to ensure the Cabinet directive is being applied consistently. The implementation date is fall 2015.
<b>3.42</b> Agriculture and Agri-Food Canada, the Canada Revenue Agency, Canadian Heritage, and Fisheries and Oceans Canada should ensure that, when they assess proposals, the requirements of the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals and its related envideding a grad entity for	<b>Agriculture and Agri-Food Canada's response.</b> Agreed. Agriculture and Agri-Food Canada (the Department) will review and update guidance documents and processes to ensure that proposals will be assessed in accordance with the requirements of the Cabinet directive and its associated guidelines. The Department will develop procedures for inclusion in the departmental strategic environmental assessment guide that will document rationales for exceptions. The target date is 31 December 2015.
guidelines are met, or that rationales for exceptions are documented. (3.32–3.41)	<b>The Canada Revenue Agency's response.</b> Agreed. The Canada Revenue Agency will review and update its approval processes and revise its tools and templates to ensure compliance with the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals. The Canada Revenue Agency will also increase awareness of the Cabinet directive and its requirements among proposal developers. These developments will be completed by June 2016.
	<b>Canadian Heritage's response.</b> Agreed. While Canadian Heritage has not consistently documented its work on strategic environmental assessments (SEAs), it will continue to ensure that all policy, plan, and program proposals are appropriately assessed and ensure that this work is documented in line with the requirements of the Cabinet directive. Canadian Heritage will implement detailed guidelines on the SEA process, including analytical tools and reporting requirements.
	<b>Fisheries and Oceans Canada's response.</b> Agreed. Fisheries and Oceans Canada has reviewed and revised its strategic decision-making processes to ensure a consistent and documented approach is used when assessing policy, plan, and program proposals. This approach supports departmental accountability in its strategic environmental assessment process and compliance with the requirements of the Cabinet directive. The implementation date is fall 2015.

#### Recommendation

#### **Reporting publicly**

**3.55** Agriculture and Agri-Food Canada, the Canada Revenue Agency, Canadian Heritage, and Fisheries and Oceans Canada should report on the extent and results of their strategic environmental assessment practices as required by the Cabinet directive and its related guidelines. **(3.48–3.54)**  **Agriculture and Agri-Food Canada's response.** Agreed. The extent and results of strategic environmental assessment practices will be reported in the departmental sustainable development strategies, supplementary to its Report on Plans and Priorities and departmental performance reports. The target date is December 2015 (aligned with the tabling of the 2015–16 Departmental Performance Report).

**The Canada Revenue Agency's response.** Agreed. The Canada Revenue Agency will report publicly on its preliminary scans and strategic environmental assessments through its annual Departmental Performance Report, in accordance with the Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals. This will be implemented beginning with the 2015–16 Departmental Performance Report. For proposals requiring detailed strategic environmental assessments, public reporting will also be done through stand-alone public statements.

**Canadian Heritage's response.** Agreed. Canadian Heritage will report on the extent and results of its strategic environmental assessment practices in its reports on plans and priorities, and departmental performance reports, in accordance with Treasury Board of Canada Secretariat guidelines and templates.

**Fisheries and Oceans Canada's response.** Agreed. Fisheries and Oceans Canada will report publicly on the extent and results of strategic environmental assessment practices in its Report on Plans and Priorities, and Departmental Performance Report, in accordance with the Cabinet directive and related guidelines. In addition, Fisheries and Oceans Canada will improve its reporting on progress towards Federal Sustainable Development Strategy goals and targets within its internal processes, tools, and documentation. The implementation date is fall 2015.

**Fisheries and Oceans Canada's response.** Agreed. Fisheries and Oceans Canada will publicly report on detailed strategic environmental assessments conducted for all announced or approved proposals by issuing public statements on its website. The implementation date is fall 2015.

**3.63** Fisheries and Oceans Canada should issue a public statement for all announced or approved proposals as required by the Cabinet directive and its related guidelines. **(3.56–3.62)**