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26 March 2025

To:
Lisa French
Vice-President, Sustainability Standards
277 Wellington Street West
Toronto, ON M5V 3H2

Dear Ms French,

Re: Proposed 2025-2028 Strategic Plan Consultation

The Canada Climate Law Initiative (CCLI) submits this response to the Canadian Sustainability Standards Board (CSSB) as part of its consultation on the proposed 2025-2028 Strategic Plan.¹ CCLI supports the CSSB's efforts to adopt the International Financial Reporting Standards (IFRS) Foundation's International Sustainability Standards Board (ISSB) IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information* and IFRS S2 *Climate-related Disclosures*.² We acknowledge the CSSB's commitment to advancing these sustainability disclosure standards in Canada and commend its focus on Indigenous inclusion and alignment with global frameworks.

CCLI is a collaboration between the faculties of law at the University of British Columbia and York University, providing businesses and regulators with climate governance guidance so that they can make informed decisions in the transition to a net-zero economy. Powered by the nation's top experts, we engage with boards of directors and trustees to ensure businesses, pension funds, and asset managers understand their legal duties with respect to climate change. Our legal research offers important insights into a rapidly transforming policy

¹ Canada Sustainability Standards Board, "[CSSB's Proposed 2025-2028 Strategic Plan](#)" (January 2025).

² International Sustainability Standards Board, *IFRS S1: General Requirements for Disclosure of Sustainability-related Financial Information* (June 2023); International Sustainability Standards Board, *IFRS S2: Climate-related Disclosures* (June 2023).

landscape.³ CCLI is also the Canadian partner of the global Commonwealth Climate and Law Initiative, founded at Oxford University.

We respond to the survey questions below but begin with overarching comments that we believe are critical to this consultation.

CSDS 1 and CSDS 2 are essential for improving the identification, oversight, and management of climate-related financial risks and opportunities.⁴ Canada requires an estimated \$115 billion in annual climate financing to transition to a net-zero economy.⁵ Canada's adoption of globally standardized sustainability disclosure is crucial because clear and consistent climate-related standards are key to fostering this sustainable economic growth and much-needed capital through better-informed investor decision-making.

To facilitate the adoption of the CSDS 1 and 2 through a strengthened strategic plan, we recommend:

1. **Improving accessibility** by addressing barriers such as the Chartered Professional Accountants (CPA) Canada paywall and enhancing direct engagement through question and answer (Q&A) help desks, interactive webinars, roundtables, and forums to support companies' adoption of these standards.
2. **Increasing regulatory engagement** to align mandatory disclosure requirements with CSDS 1 and CSDS 2.
3. **Integrating Indigenous considerations directly into CSDS 1 and 2** rather than developing a separate building-block standard or guidance, which risks positioning Indigenous concerns as secondary.

These recommendations are discussed in greater detail in our responses to each specific consultation question.

³ See for example, Margot Hurlbert, "[Cultivating Effective Climate Governance: A Guide for Small Farm Corporations in Canada](#)" (CCLI, 2024); Helen Tooze, "[Unearthing a Greener Future: Digging Deeper into Effective Climate Governance in the Canadian Mining Sector](#)" (CCLI, 2024); Helen Tooze, "[Canadian Credit Unions and Effective Climate Governance Cooperating for a Sustainable Future](#)" (CCLI and Canadian Credit Union Association, 2023); Janis Sarra and Norie Campbell, "[Banking on a Net-Zero Future: Effective Climate Governance for Canadian Banks](#)" (CCLI 2022); Janis Sarra, "[Life, Health, Property, Casualty: Canadian Insurance Company Directors and Effective Climate Governance](#)" (CCLI 2021); Janis Sarra, Roopa Davé, Meghan Harris-Ngae, and Ravipal Bains, "[Audit Committees and Effective Climate Governance: A Guide for Boards of Directors](#)" (CCLI, 2020).

⁴ Canadian Sustainability Standards Board, *Canadian Sustainability Disclosure Standards: General Requirements for Disclosure of Sustainability-related Financial Information* (December 2024) [CSDS 1]; Canadian Sustainability Standards Board, *Canadian Sustainability Disclosure Standards: Climate-related Disclosures* (December 2024) [CSDS 2].

⁵ SFAC, "[Taxonomy Roadmap Report Mobilizing Finance for Sustainable Growth by Defining Green and Transition Investments](#)" (September 2022).

Question 1: Mission, Vision, and Values

Do you agree with our mission, vision, and values? If not, why not?

Overall, the CSSB's mission, vision, and values provide a strong foundation for advancing sustainability disclosure in Canada. However, the strategic plan should more clearly articulate how the CSSB intends to ensure its vision translates into the broad adoption of its standards. While the plan outlines key priorities, it must establish a stronger link between objectives and measurable outcomes to demonstrate how these efforts will result in meaningful implementation.

One key area for improvement would be to focus on practical outcomes that support adoption and build trust in sustainability standards. Companies need clear guidance, resources, and engagement opportunities to navigate the complexities of sustainability reporting. The CSSB should outline specific strategies to increase adoption, such as capacity-building initiatives, targeted outreach to industries with low disclosure rates, and enhanced support for small and medium-sized enterprises (SMEs) and public-sector entities.⁶ Strengthening these adoption strategies will reinforce confidence in the CSSB's role as the trusted Canadian authority on sustainability disclosure.

Additionally, accessibility remains a critical barrier to adoption. The CPA Canada paywall, due to kick in on 31 March 2025,⁷ limits access to essential guidance, potentially discouraging broader uptake of sustainability standards. To address this adoption barrier, the CSSB should work towards making key materials, including the standards, implementation guidance, and best practices, freely available. Expanding interactive engagement mechanisms—such as webinars, open forums, and direct Q&A support—will further ensure that companies, investors, and other stakeholders can effectively understand and apply CSDS 1 and CSDS 2.

CCLI believes that, by aligning its strategic priorities more explicitly with these practical considerations, the CSSB can drive greater adoption and trust in sustainability standards, ultimately advancing its mission and vision in meaningful and measurable ways.

Question 2: Strategic Priorities

Are there any priorities or objectives that should be added, changed or removed from the proposed Strategic Plan? If so, please specify which priority or objective you are referring to and explain your reasoning.

The CSSB's strategic plan sets out important priorities for advancing sustainability disclosure in Canada but lacks necessary detail on how these priorities will be implemented. A clear

⁶ SMEs make up a significant part of Canada's economy. As of December 2023, SMEs (1-499 employees) constitute 99.6% of the 1.10 million businesses in Canada. Moreover, SMEs employ 7.9 million (63.6%) of the 12.5 million private sector employees in Canada. See Government of Canada, "[Key Small Business Statistics 2024](#)" (5 March 2025) at 8, 20.

⁷ Chartered Professional Accountants Canada, "[CPA Canada Handbook – Sustainability](#)".

strategic plan should not only outline key objectives but also define the actions required to achieve them. For example, the IFRS Foundation’s *Consultation on Agenda Priorities* provides actionable responses to stakeholder feedback, outlining how the IFRS plans to address its specific priorities.⁸ Similarly, the Australian Securities and Investments Commission’s (ASIC) Corporate Plan for 2024-2025 explicitly details the “key activities” associated with its priorities, ensuring a structured and transparent approach to implementation.⁹ In contrast, the CSSB’s strategic plan leaves open questions about how its priorities will be translated into practice. Providing a detailed roadmap—including milestones, responsible parties, and expected outcomes—would enhance clarity and accountability.

A critical area requiring more specificity in Priority A is regulatory engagement, particularly in promoting mandatory disclosures. The CSSB has a key role in working with Canadian regulators, such as the Canadian Securities Administrators (CSA), to align sustainability disclosure standards with regulatory requirements. Many jurisdictions, including the European Union (EU),¹⁰ the United Kingdom (UK)¹¹ and California in the United States (US),¹² have moved towards mandatory sustainability reporting, ensuring consistency and comparability in disclosures. Without a clear strategy for engaging regulators and advocating for the adoption of CSDS 1 and CSDS 2 into Canada’s regulatory framework, there is a risk that voluntary adoption may not reach the necessary scale to support investor confidence and capital allocation. CCLI believes that strengthening the CSSB’s commitment to regulatory engagement would better help drive the widespread adoption of sustainability standards in Canada.

Beyond regulatory alignment, Priority A of the strategic plan should also include enhanced educational and guidance measures to support implementation. Companies need more than

⁸ International Foundation of Reporting Standards, “[Feedback Statement: Consultation on Agenda Priorities](#)” (June 2024) [IFRS, Agenda Priorities Feedback].

⁹ Australian Securities and Investment Commission, “[Corporate Plan 2024-2025](#)” (22 August 2024) at 16-21.

¹⁰ *Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting*, [2022] OJ L 322/15, arts 29(b)–29(c) (the *Corporate Sustainability Reporting Directive* or *CSRD*) requires requisite companies to report in alignment with the *Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards*, [2023] OJ L 2023/2772 (the *European Sustainability Reporting Standards* or *ESRS*). The *CSRD* applies to different companies over various timeframes.

¹¹ The *Companies (Strategic Report) (Climate-related Financial Disclosure) Regulations 2022*, (UK), SI 2022/31 amends the *Companies Act 2006*, (UK), c 46 by inserting sections 414CA and 414CB. Section 414CA requires companies to include a “non-financial and sustainability information statement” in their strategic report (s 414CA(A1)), whilst section 414CB specifies that the “non-financial and sustainability information statement must contain the climate-related financial disclosures of the company” (s 414CB(A1)).

¹² US, Senate Bill 261, *Climate-related Financial Risk Act*, 2023-2024, Reg Sess, Cal, 2023, US, Senate Bill 253, *Climate Corporate Data Accountability Act*, 2023-2024, Reg Sess, Cal, 2023 mandate the reporting of climate-related risk and scope 1, 2 and 3 GHG emissions respectively.

just written guidance—they require interactive opportunities to engage with experts, ask questions, and receive practical support on correct implementation. Other jurisdictions have taken proactive steps in this regard. For example, the Australian Accounting Standards Board (AASB) has recognized the importance of education in their Corporate Plan, explicitly stating:

The AASB also intends to make education a priority in 2024-25. To this end, the AASB will develop educational and supporting materials, such as Frequently Asked Questions (FAQ), webinars, and webcasts, to build its knowledge base and further develop a common understanding of Climate-related Financial Disclosures by summarising, explaining, or illustrating disclosure requirements and how they might be applied.¹³

Moreover, the European Financial Reporting Advisory Group (EFRAG) has a knowledge hub and European Sustainability Reporting Standards (ESRS) Q&A Platform which “aims to collect and answer technical questions that remain unresolved after thorough analysis by stakeholders to support the implementation of [ESRS]”.¹⁴

The feedback received in the consultations on CSDS 1 and 2 included numerous requests for additional information and guidance on various issues related to the implementation of CSDS 1 and 2.¹⁵ The CSSB can build on the feedback received in its consultations to develop structured educational programs, including technical manuals, industry-specific webinars, Q&A forums, and ongoing engagement opportunities with companies to clarify disclosure requirements.

By integrating clear, actionable steps for implementation, regulatory engagement, and interactive educational opportunities, we believe the CSSB can ensure that its strategic priorities lead to meaningful adoption and effective sustainability reporting in Canada.

¹³ Australian Accounting Standards Board & Auditing and Assurance Standards Board, [“Corporate Plan 2024-2025”](#) (28 August 2024) at 20.

¹⁴ European Financial Reporting Advisory Group, [“EFRAG ESRS Q&A Platform”](#).

¹⁵ Financial Reporting and Assurance Standards Canada, [Response booklet A-D – CSSB Exposure Drafts: Proposed CSDS 1, CSDS 2, and CSSB Consultation Paper: Proposed Criteria for Modification Framework](#) (July 2024); Financial Reporting and Assurance Standards Canada, [Response booklet E – CSSB Exposure Drafts: Proposed CSDS 1, CSDS 2, and CSSB Consultation Paper: Proposed Criteria for Modification Framework](#) (July 2024); Financial Reporting and Assurance Standards Canada, [Response booklet F-W – CSSB Exposure Drafts: Proposed CSDS 1, CSDS 2, and CSSB Consultation Paper: Proposed Criteria for Modification Framework](#) (July 2024).

Priority A

- *Support the setting and adoption of high-quality sustainability standards through listening to and engagement with interested and affected parties, providing for voluntary adoption by Canadian entities and for use by Canadian regulatory and governmental authorities as the reference source of sustainability disclosure requirements.*
- *Increase connectivity with other Canadian reporting standard setters.*

Along with the comments on specificity detailed above, CCLI feels that aligning Canadian sustainability disclosure standards with global frameworks, particularly the ISSB, is essential for ensuring consistency, credibility, and investor confidence. The CSSB's commitment to adapting the ISSB's IFRS S1 and S2 standards for the Canadian context is a crucial step in fostering alignment with international best practices. However, targeted collaboration and coordination are necessary to strengthen this alignment and to address gaps in transition planning, climate-related accounting, and greenhouse gas (GHG) reporting.

A key challenge remains the legal and regulatory disconnect between sustainability reporting, GHG accounting, and financial disclosure obligations. Companies face a complex landscape of overlapping, inconsistent frameworks and standards, such as the GHG Protocol and CSDS standards, whilst complying with Canada's Bill C-59 on greenwashing. This regulatory fragmentation creates uncertainty, leading some companies to "greenhush"—withholding climate disclosures out of fear of inadvertently misrepresenting their environmental commitments.¹⁶ The CSSB must take a leadership role in driving consistency and coordination across these frameworks, ensuring companies have a clear and navigable path to credible sustainability reporting. Addressing this issue is essential to building trust in the disclosure regime and encouraging greater transparency in corporate sustainability practices.

The CSSB is also uniquely positioned to mobilize stakeholders, technical expertise, and resources to help SMEs adopt the CSDS. Without tailored support, SMEs risk being excluded from sustainable finance opportunities due to capacity and knowledge gaps. To bridge this gap, the CSSB should facilitate educational initiatives, sector-specific guidance, and practical tools to ensure effective implementation. Additionally, the CSSB should ensure that CSDS are integrated into existing SME accounting requirements. A phased approach—through simplified frameworks or scaled reporting requirements—would enhance accessibility, encourage adoption, and ensure SMEs remain aligned with broader sustainability initiatives. CCLI believes that strengthening this aspect of the strategic plan would create a more inclusive and robust sustainability reporting landscape in Canada.

¹⁶ Kim Logue Ortega, "[Greenhushing: What It Is & Why It Matters](#)", *JS Held* (4 February 2025).

Priority B

- *Enhance outreach and engagement with Indigenous Peoples to build trust and deepen relationships.*
- *Create new pathways for Indigenous Peoples to participate in standard-setting processes and provide feedback.*
- *Champion the inclusion of Indigenous rights and interests in CSDSs.*

The CSSB's commitment to Indigenous engagement and integration of Indigenous knowledge into sustainability disclosure is a vital and commendable aspect of its strategic plan. Ensuring that Indigenous perspectives, rights, and traditional knowledge are meaningfully embedded in Canada's sustainability standards strengthens both the credibility and inclusivity of disclosure practices. However, to fully realize this commitment, the CSSB should align its approach with the principles and protocols outlined in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), which was implemented into Canadian legislation by the *United Nations Declaration on the Rights of Indigenous Peoples Act* that received Royal Assent on 21 June 2021.¹⁷ British Columbia's leadership in implementing UNDRIP through legislative and policy frameworks provides a strong example of how sustainability disclosure can reflect Indigenous rights and governance structures.¹⁸ Embedding UNDRIP principles into the CSSB's standard-setting process would ensure that Indigenous engagement is substantive, not merely symbolic.

Canada's constitutional duty to consult as well as the principle of free, prior, and informed consent should both be embedded in sustainability disclosure requirements.¹⁹ Reporting companies must be required to disclose their consultation practices, efforts to obtain consent, and how they uphold Indigenous Peoples' right to self-determination. Transparency in corporate engagement with Indigenous communities on sustainability risks and opportunities enhances accountability and provides investors with a clearer view of how Indigenous knowledge, perspectives, and rights are integrated into governance and operations. Strengthening these commitments within the CSSB framework will foster trust, encourage meaningful engagement, and reinforce Indigenous leadership in shaping Canada's sustainability standards.

¹⁷ [United Nations Declaration on the Rights of Indigenous Peoples](#), 2007, 107th Plen Mtg, UN Doc A/61/L.67 and Add.1; Government of Canada, "[Backgrounder: United Nations Declaration on the Rights of Indigenous Peoples Act](#)" (10 December 2021); *United Nations Declaration on the Rights of Indigenous Peoples Act*, SC 2021, c 14.

¹⁸ British Columbia Government, "[Declaration Act](#)".

¹⁹ *Constitution Act, 1982*, Schedule B to the Canada Act 1982 (UK), 1982, c 11, s 35; Government of Canada, "[Provision and Context](#)" (21 March 2025); *Kebaowek First Nation v. Canadian Nuclear Laboratories*, 2025 FC 319.

Priority C

- *Participate in and influence international standard setting, with a focus on areas of greatest impact on the Canadian public interest, such as the ISSB's biodiversity research project.*
- *Lead by advocating for Indigenous voices and matters to be included in decision-making at the international level of sustainability standard setting.*

CCLI believes that the CSSB's efforts to influence international standards, particularly in biodiversity and Indigenous representation, are also commendable. Ensuring that Canada plays a proactive role in shaping sustainability disclosure at the global level can only strengthen the credibility and relevance of the country's reporting framework.

One key area of focus for the CSSB should be its continued engagement with the ISSB as it works to align its approach with the UK's Transition Plan Taskforce (TPT) Disclosure Framework to support the adoption of credible, science-based, and globally aligned transition plans.²⁰ The TPT framework provides structured guidance to ensure transition plans are credible, science-based, and globally aligned, supporting long-term net-zero commitments. Strengthening this alignment will enhance the consistency and effectiveness of sustainability disclosures in Canada.²¹ Given Canada's need for substantial climate financing, integrating a similar approach would offer companies a clear roadmap for transition planning, driving investment in sustainable projects while maintaining regulatory credibility. Since the TPT Disclosure Framework is "designed to be consistent with, and build on, the final climate-related disclosure Standard issued by the ISSB",²² this integration should be straightforward and would further reinforce Canada's leadership in sustainable finance, enhance investor confidence, and position Canadian companies within global best practices.

Ensuring robust connectivity between the CSSB and both Canadian and international accounting standard boards is critical for integrating climate-related risks and sustainability disclosures into existing financial reporting frameworks. Rather than treating these disclosures as secondary obligations, they should be fully embedded within accounting standards. The ISSB has already acknowledged this need by collaborating with organizations such as the GHG Protocol to enhance the consistency of emissions-related disclosures.²³ To address uncertainties that many companies face when incorporating sustainability-related information, the CSSB should actively collaborate with the ISSB, Canadian accounting standard boards, regulatory bodies, and other international standard setters to develop clear guidance for harmonizing sustainability and financial reporting. This coordinated approach would improve

²⁰ Transition Plan Taskforce, "[Disclosure Framework](#)" (October 2023).

²¹ *Ibid.*

²² *Ibid* at 12.

²³ Greenhouse Gas Protocol, "[GHG Protocol Launches Official Partnership with IFRS Foundation](#)" (24 June 2024); IFRS, Agenda Priorities Feedback, *supra* note 8 at 3.

adoption rates, ensure consistency, and ultimately bolster investor confidence in sustainability disclosures.

It is also positive that the CSSB aims to advance interoperability to foster global data comparability and provide users with decision-useful information. This focus on standardization and alignment with international reporting frameworks is essential to reducing the reporting burden on companies and ensuring consistency in sustainability disclosures. However, to be truly effective, the strategic plan should expand on how this interoperability will be achieved in practice. One of the major barriers to the widespread adoption of sustainability disclosure is the challenge of obtaining reliable data.²⁴ Many companies struggle with unclear data sources, underdeveloped methodologies, and difficulties in aligning sustainability metrics with financial reporting.²⁵ The CSSB should take a leadership role in advocating for clear, standardized data collection and reporting mechanisms that ensure greater reliability and usability of sustainability information.

The CSSB's emphasis on Indigenous perspectives is also particularly important, as it provides an opportunity to integrate traditional knowledge into global sustainability standards, making them more inclusive and reflective of diverse governance models. The CSSB should establish direct communication channels with Indigenous representatives to facilitate international advocacy. Sustainability standards are increasingly influenced by global frameworks, and Canada has an opportunity to position Indigenous voices at the forefront of international discussions.

Priority D

- *Determine whether the CSSB should provide separate standards and/or guidance for specific types of entities.*
- *Determine the CSSB's role in providing CSDS guidance to interested and affected parties.*

CCLI supports the development of sector-specific guidance, similar to the UK TPT framework and the European Financial Reporting Advisory Group's (EFRAG) approach.²⁶ However, CCLI notes that separate standards for different sectors and SMEs could create inconsistencies, as these entities are integral parts of larger corporations' value chains. Large corporations will still be required to disclose emissions, sustainability risks, and value chain impacts, meaning that SMEs, in particular, will ultimately need to provide compatible data. Instead of adopting a distinct disclosure standard for SMEs, the CSSB should integrate them into the existing

²⁴ Anik Islam, Colleen Kaiser & Geoff McCarney, "[Climate-related Financial Disclosures and Data Challenges: What Does it Mean for Canada's Energy Companies?](#)" (April 2024) 12:1 Energy Regulation Quarterly.

²⁵ Science Based Targets, "[Aligning Corporate Value Chains to Global Climate Goals](#)", Discussion Paper (SBTi, July 2024) at 62; R J Swart, P Raskin & J Robinson, "The problem of the future: sustainability science and scenario analysis" ScienceDirect (2004) 14:2 Global Environmental Change 137 at 139–41.

²⁶ IFRS, "[Transition Plan Taskforce Resources](#)"; EFRAG, "[Sector-specific ESRS](#)".

CSDS standards by offering proportionate guidance, phased implementation pathways, and targeted support. This approach would ensure consistency across the value chain while facilitating the broad adoption of sustainability disclosures.

SMEs face unique challenges in implementing sustainability disclosures due to resource constraints, limited technical expertise, and difficulties accessing reliable data. If the CSSB opts to provide a separate reporting standard for SMEs, EFRAG's *Voluntary Sustainability Reporting Standard for non-listed SMEs* (VSME) provides a valuable model for supporting smaller entities while maintaining alignment with broader corporate disclosure requirements.²⁷ The VSME Standard "covers the same sustainability issues as the European Sustainability Reporting Standards (ESRS) for large undertakings. However, it is proportionate and therefore considers micro-, small- and medium-sized undertakings' fundamental characteristics. [...] Consistency with ESRS for large undertakings has been carefully considered in the preparation of this Standard while defining proportionate requirements."²⁸

To facilitate SME adoption, the CSSB should also significantly expand its education and guidance initiatives to provide SMEs with the tools needed. This includes the development of continuous webinars and information sessions tailored to different industries, a central resource hub where companies can access guidance on disclosure requirements, and interactive platforms such as Q&A desks, live webinars, and roundtable discussions where businesses can seek clarity on implementation challenges.

By prioritizing education, ensuring SMEs are integrated into the broader disclosure framework, and engaging with international standard setters, the CSSB can foster a reporting environment that is both inclusive and effective. These measures will help ensure that sustainability reporting is not seen as a burden, but rather as a valuable tool for businesses to enhance transparency, manage risks, and attract sustainable investment.

Priority E

- *Enhance transparency in decision-making and timely processing of feedback for future consultations.*
- *Conduct effective post-implementation reviews that reflect feedback from interested and affected parties.*
- *Enhance engagement with the Francophone community in the standard-setting process.*

Post-implementation reviews are crucial to ensuring sustainability disclosure standards remain effective and accessible. As such, CCLI believes that post-

²⁷ EFRAG, *Voluntary Sustainability Reporting Standard for non-listed SMEs* (December 2024).

²⁸ *Ibid*, ss 3–4.

implementation reviews should include a dedicated evaluation of SMEs, ensuring a consistent set of standards with differentiated applicability based on business size and capacity. Maintaining a common framework but adjusting application requirements for SMEs would provide clarity while preventing fragmentation in reporting practices. By careful evaluation of consultation feedback, the CSSB can establish a clear consensus on how sustainability standards apply to SMEs, and that consensus would ensure that businesses of all sizes have a shared understanding of expectations while allowing for proportional implementation.

Additionally, while engaging Francophone communities is important, the rationale for focusing specifically on this group should be clarified within the strategic plan. Inclusivity should be broad to ensure that all under-represented groups—such as Indigenous businesses, remote and rural enterprises, and new market entrants—receive tailored support. Effective outreach should be designed to reach a diverse range of stakeholders, ensuring that the CSSB's standard-setting processes and procedures reflect the needs of the full spectrum of Canadian businesses adopting sustainability standards.

Questions 3-4: Indigenous Matters

3. How should the CSSB integrate this priority and its objectives into sustainability standard setting in Canada? (a) A building-block approach (b) Guidance on materiality and Indigenous matters (c) All the above

Indigenous matters should be fully integrated into the existing CSDS standards rather than placed in a separate building-block standard or guidance, which would risk positioning these matters as secondary considerations. Sustainability disclosure must reflect Indigenous rights, knowledge, and governance frameworks as an inherent part of the reporting process, not as an optional or supplementary component. Embedding Indigenous perspectives directly into CSDS 1 and CSDS 2 ensures that they are recognized as fundamental to sustainability reporting, reinforcing their importance in corporate decision-making and regulatory compliance.

4. If you answered (a), what components/elements would you expect to see in a building-block standard focusing on Indigenous matters?

The standards must allow for jurisdiction-specific adaptation while respecting the unique cultural distinctions of the communities involved. Such an approach must not be one-size-fits-all but instead be flexible enough to accommodate regional legal, social, and cultural nuances. Moreover, it should incorporate tailored engagement protocols that recognize and honour Indigenous governance structures. This ensures that Indigenous Peoples are central to the decision-making process, with their rights, traditions, and leadership models respected at every step of the adaptation process.

Question 9: Criteria for Strategic Priorities

Has the CSSB identified the appropriate criteria for assessing strategic priorities? If not, why not?

The CSSB has identified appropriate criteria for assessing strategic priorities, particularly in its focus on prevalence, impact, and alignment with national and international standards. These criteria provide a strong foundation for evaluating and advancing sustainability disclosure in Canada. However, we recommend introducing a clear hierarchy within the strategic priorities to ensure that the most pressing or foundational objectives take precedence. CCLI believes that a structured, tiered approach would allow the CSSB to allocate its resources efficiently, focusing on critical priorities while still enabling the progressive integration of secondary goals.

In particular, the adoption and dissemination of the CSDS should be explicitly prioritized within the assessment criteria. Ensuring that the CSDS is fully embedded in decision-making processes will foster a more cohesive approach to advancing sustainability disclosure in Canada. Additionally, a structured prioritization framework would enhance transparency in how the CSSB balances its mission, external developments, and stakeholder interests when setting its strategic direction.

How We Can Help

CCLI can play a crucial role in supporting the CSSB's efforts to implement the CSDS as outlined in the 2024-2025 Annual Plan. In particular, CCLI can assist with the adoption of CSDS standards by facilitating strategic engagement with the CSA. This could involve coordinating and supporting meetings with securities regulators during the Chair's visits to various cities, ensuring that discussions are productive and aligned with the broader goals of the CSDS. By actively contributing to these efforts, CCLI can help foster greater awareness and commitment to adopting the CSDS standards, supporting the CSSB in securing the necessary regulatory backing for these initiatives.

In addition to regulatory engagement, CCLI can offer free educational sessions to boards and other stakeholders through the CSSB, focusing on the precise details and strategies for adopting and implementing CSDS 1 and 2. These sessions would include tailored guidance on key areas such as quantitative scenario analysis, Scope 3 emissions, proportionality measures, and time horizons, ensuring that stakeholders are well-equipped to navigate the complexities of the CSDS framework. CCLI could also facilitate webinars and consultation meetings led by climate governance experts, providing a platform for stakeholders to gain insights and share best practices. Furthermore, CCLI can serve as a valuable sounding board for policies and best practices as they are developed, offering expert feedback to ensure that the evolving standards remain robust, actionable, and aligned with broader climate governance goals.

We appreciate the opportunity to contribute to your 2025-2028 Strategic Plan and hope this feedback supports the CSSB's mission in the years ahead. CCLI is committed to assisting the CSSB in advancing its priorities and looks forward to our continued collaboration.

On behalf of the Canada Climate Law Initiative,



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Canada Climate Law Initiative | L'Initiative canadienne de droit climatique