



**Environment and Climate Change Canada’s Detailed Management Action Plan  
For the recommendations of [Report 1—Contaminated Sites in the North \(oag-bvg.gc.ca\)](https://oag-bvg.gc.ca)  
Spring 2024 Reports of the Commissioner of the Environment and Sustainable Development**

Paragraph in report	CESD Recommendation	Departmental Response	Description of Final Expected Outcome/Result	Expected Final Completion Date	Action Plan and Key Milestones (Description/Dates)	Responsible Organization/ Contact (Division, Branch, Directorate)
26	<p>To achieve the Federal Contaminated Sites Action Plan’s objective of reducing the financial liability, Environment and Climate Change Canada, working with program partners should support custodians in reducing financial liability by:</p> <ul style="list-style-type: none"> <li>increasing custodians’ capacity to develop more accurate liability estimates—for example, by establishing average estimation gaps for a variety of projects, sharing lessons learned, and providing additional training and access to experts.</li> <li>developing measures and flexibility mechanisms to reduce the funding carried forward and the associated delays in the remediation of contaminated sites.</li> <li>conducting an analysis to identify and recommend appropriate proportions of assessment and remediation funding.</li> </ul>	<p>Agree.</p> <p>Environment and Climate Change Canada (the department), working with key program partners, will support custodians’ and industry capacity to develop more accurate cost estimates by conducting an analysis of estimation gaps for a variety of projects, reviewing current capacity and practices, providing findings, lessons learned, and recommendations regarding additional improvements to the Federal Contaminated Sites Action plan (the program) interdepartmental governance, including measures such as training, guidance, and access to expertise by March 2027.</p> <p>The department will continue to encourage the use of mechanisms such as interdepartmental transfers, early and collaborative planning, and contingency projects, to reduce the funding carried forward. The department will investigate with</p>	<p>Measures, such as training, guidance, and sharing of lessons learned, are implemented to increase the capacity of custodians and industry to develop more accurate cost estimates.</p> <p>Updated program parameters and terms of reference for the program interdepartmental governance for Phase V, as appropriate, to implement and track funding utilization and approved mechanisms for minimizing the carry forward.</p> <p>Analysis completed of the appropriate proportions of assessment and remediation funding.</p>	March 2027	<p><b>Liability estimates</b></p> <p>The department will:</p> <ul style="list-style-type: none"> <li>By September 2026, working with key program partners including Public Services and Procurement Canada and Treasury Board of Canada Secretariat, will examine historical data, and information from custodians, and review capacity and practices.</li> <li>By January 2026, working with program partners, will undertake an analysis of estimation gaps to determine the feasibility of establishing average gaps to aid custodians in developing more accurate liability estimates.</li> <li>By March 2027, working with program partners, will present findings, lessons learned, and recommendations to the program’s Director General Advisory Committee for approval of options to increase custodian and industry capacity through measures such as training, guidance, access to expertise, and sharing of lessons learned.</li> </ul>	<p>Federal Contaminated Sites Action Plan Secretariat, Environment and Climate Change Canada</p> <p>(Contaminated Sites Division, Environmental Protection Operations Directorate, Environmental Protection Branch)</p>



Paragraph in report	CESD Recommendation	Departmental Response	Description of Final Expected Outcome/Result	Expected Final Completion Date	Action Plan and Key Milestones (Description/Dates)	Responsible Organization/ Contact (Division, Branch, Directorate)
		<p>partners whether there are any potential additional measures and flexibility mechanisms, within the parameters of the financial administration act and treasury board policies and provide recommendations as part of the renewal of the program for Phase V by March 2025.</p> <p>The department will conduct an analysis on appropriate proportions of assessment and remediation funding for completion by March 2026.</p>			<p><b>Measures and flexibility mechanisms to reduce the funding carried forward and associated delays in the remediation of contaminated sites</b></p> <p>The department will, by March 2025:</p> <ul style="list-style-type: none"> <li>- Finalize an investigation with partners and Treasury Board Secretary on whether there are any potential additional measures and flexibility mechanisms, within the parameters of the Financial Administration Act and Treasury Board policies;</li> <li>- Provide recommendations to the program governance to consider as part of the renewal of the program for Phase V; and,</li> <li>- Incorporate existing and any new measures into the program design for phase V, including the terms of reference for the program interdepartmental governance, the requirement to implement and track approved mechanisms for minimizing the carry forward.</li> </ul> <p><b>Appropriate proportions of assessment and remediation funding to support program effectiveness</b></p> <p>The department will, by March 2026:</p> <ul style="list-style-type: none"> <li>- Complete an analysis of practices and recommendations of spending on assessment vs remediation in other jurisdictions, the private sector, and custodians, and share findings and recommendations with Federal Contaminated Sites Action Plan (FCSAP) Director General committee.</li> </ul>	



Paragraph in report	CESD Recommendation	Departmental Response	Description of Final Expected Outcome/Result	Expected Final Completion Date	Action Plan and Key Milestones (Description/Dates)	Responsible Organization/ Contact (Division, Branch, Directorate)
41	<p>To achieve the Federal Contaminated Sites Action Plan's of reducing the environmental and human health risks, and to support custodians more effectively and make greater progress toward program priorities—such as reconciliation with Indigenous Peoples, and climate change - Environment and Climate Change Canada, working with program partners, should:</p> <ul style="list-style-type: none"> <li>• directly measure environmental and human health risk reduction</li> <li>• improve quality assessment and quality control for key program elements, such as closure, to provide assurance that environmental and human health risks are reduced.</li> <li>• develop a consistent approach for custodians to document and report on key program priorities—such as site closure, climate change, and Indigenous engagement.</li> </ul>	<p>Agree.</p> <p>Environment and Climate Change Canada (the department) will:</p> <ul style="list-style-type: none"> <li>• Explore with program partners cost-effective and meaningful approaches to directly measuring and reporting on environment and human health risk reduction by March 2028.</li> <li>• Improve assessment and quality control and the consistency of site closure practices by conducting a review of custodians' documentation and providing feedback to individual custodians and findings to governance by June 2027.</li> <li>• Ensure a consistent approach is in place, by June 2026, to document and report on program priorities related to:               <ul style="list-style-type: none"> <li>○ Climate change adaptation;</li> <li>○ Indigenous engagement; and</li> <li>○ Indigenous economic benefits.</li> </ul> </li> </ul>	<p>Recommendations made to program governance on cost-effective and meaningful approaches to directly measuring and reporting on environment and human health risk reduction, and implementation plan in place for any changes approved by governance.</p> <p>A consistent approach is in place to document and report on program priorities, and quality control measures are implemented for site closure documents.</p>	March 2027	<p><b>Measure risk reduction directly</b></p> <p>The department will:</p> <ul style="list-style-type: none"> <li>- By March 2027, working with Expert Support Departments and custodians, complete a review of how other jurisdictions measure risk reduction.</li> <li>- By March 2028, make recommendations to the program governance regarding options to directly measure and publicly report on risk reduction.</li> </ul> <p><b>Site closure</b></p> <p>The department will:</p> <ul style="list-style-type: none"> <li>- By September 2026, complete a quality review of site closure documentation for sites that have been closed for conformity against program requirements.</li> <li>- By March 2027, report findings to custodians and to the program governance, including recommendations to address any deficiencies such as future quality reviews.</li> </ul> <p><b>Consistent performance measures and supporting methodologies</b></p> <p><u>Climate Change Adaptation</u></p> <p>The department will:</p> <ul style="list-style-type: none"> <li>- By March 2025, establish with program partners one or more performance measures and associated targets for use in Phase V for which data will be gathered annually.</li> <li>- By April 2026, finalize the reporting template that will be used to collect the information.</li> </ul>	<p>Federal Contaminated Sites Action Plan Secretariat, Environment and Climate Change Canada</p> <p>(Contaminated Sites Division, Environmental Protection Operations Directorate, Environmental Protection Branch)</p>



Paragraph in report	CESD Recommendation	Departmental Response	Description of Final Expected Outcome/Result	Expected Final Completion Date	Action Plan and Key Milestones (Description/Dates)	Responsible Organization/ Contact (Division, Branch, Directorate)
					<ul style="list-style-type: none"> <li>- By June 2026, deliver training for custodians to ensure a consistent approach is used in documenting and reporting the results.</li> </ul> <p><u>Indigenous engagement</u> The department will:</p> <ul style="list-style-type: none"> <li>- By March 2025, establish with program partners one or more performance measures and associated targets for use in Phase V for which data will be gathered annually.</li> <li>- By April 2026, finalize the reporting template that will be used to collect the information.</li> </ul> <p><u>Indigenous economic benefits</u> The department will:</p> <ul style="list-style-type: none"> <li>- By March 2025, establish with custodians and Public Services and Procurement Canada one or more performance measures and associated targets for use in Phase V, in alignment with the Government of Canada’s objective that a minimum of 5% of the value of federal procurements be awarded to Indigenous-owned businesses, for which data will be gathered annually.</li> <li>- By April 2026, finalize the reporting template that will be used to collect the information.</li> </ul>	
52	To improve transparency on contaminated site management and remediation efforts—for all Canadians, but especially those living in affected communities— Environment and Climate Change Canada, working with program partners, should improve its	Agree. Environment and Climate Change Canada (the department) will: <ul style="list-style-type: none"> <li>• maintain indicators, for use in Phase V, which are effective and support reporting over time</li> </ul>	Information and performance data on government priority areas (such as climate change and Indigenous engagement and socio-economic benefits) and progress on key outcomes from the beginning of the	March 2028	<b>Maintaining indicators for the program’s objectives and priorities</b>  The department will: <ul style="list-style-type: none"> <li>- By March 2025, working with partners, review and finalize performance measures for use in Phase V, which are effective and</li> </ul>	Federal Contaminated Sites Action Plan Secretariat, Environment and Climate Change Canada



Paragraph in report	CESD Recommendation	Departmental Response	Description of Final Expected Outcome/Result	Expected Final Completion Date	Action Plan and Key Milestones (Description/Dates)	Responsible Organization/ Contact (Division, Branch, Directorate)
	<p>performance measurement and reporting for the Federal Contaminated Sites Action Plan by</p> <ul style="list-style-type: none"> <li>Maintaining indicators when monitoring and reporting on progress against program objectives and priorities</li> <li>Clearly reporting publicly on program commitments that are of interest to Canadians and in line with government priorities, such as climate change, reconciliation with Indigenous Peoples and socio-economic benefits</li> <li>Publicly reporting on progress made toward program outcomes from the beginning.</li> </ul>	<p>against program objectives and government priorities. The list of indicators for phase V will be finalized by March 2025.</p> <ul style="list-style-type: none"> <li>with the results of the first year of phase V report publicly on identified program commitments through mechanisms such as the program annual report, the horizontal initiative table, and Canada.ca by November 2027.</li> <li>supplement the current annual report with information on key program outcomes from the beginning of the program, starting with the program's 2024-2025 annual report, or achieve the equivalent outcome through another tool such as Canada.ca by November 2027.</li> </ul>	<p>program are reported publicly.</p>		<p>support reporting over time against program objectives and government priorities.</p> <p><b>Report publicly on program commitments and on the progress of program outcomes from the beginning of the program</b></p> <p>The department will:</p> <ul style="list-style-type: none"> <li>By March 2026, publish the program's 2023-2024 annual report with information on outcomes from the beginning of the program.</li> <li>By November 2027, publish results of the first year of phase V with performance information for program objectives and government priorities, including reconciliation with Indigenous peoples and climate change, as well as key program outcomes from the beginning of the program.</li> </ul>	<p>(Contaminated Sites Division, Environmental Protection Operations Directorate, Environmental Protection Branch)</p> <p>[Support: Communications]</p>

**Note:**

- The Audit and Evaluation Branch will refer to this management action plan in its periodical follow-up with each Branch Head and in its report to the Deputy Minister on the progress made in implementing the OAG or CESD recommendations.