FSDS Goal or Section Reference	Issue or Opportunity Identified	Recommended Change or Addition	Rationale	Evidence or Source
Goal 13	Recognize Architects as Climate Implementation Partners. The FSDS identifies buildings and procurement levers but does not explicitly recognize the role of regulated design professionals in translating policy into built outcomes.	Add language in relevant implementation strategies stating that: Architects and allied design professionals are key delivery partners in achieving building-sector emissions reductions and resilience objectives. Federal departments will engage regulated design professionals early in project planning to optimize whole-life carbon, resilience, and circularity outcomes. Professional associations will be considered partners in scaling implementation guidance and knowledge mobilization.	Climate targets in the built environment are achieved through design decisions made at early project stages. Recognizing architects as implementation partners strengthens policy-to-practice alignment and improves accountability.	Greening Government Strategy identifies federal construction as a key implementation mechanism.
13, 15, 16	Embed Design Leadership to Deliver Whole-Life Carbon, Resilience, Circularity, and Long-Term Public Value. The Draft 2026–2029 Federal Sustainable Development Strategy identifies key building-sector levers, including embodied carbon standards, retrofit acceleration, circular economy measures, housing delivery, and federal procurement. However, it does not explicitly integrate design-stage responsibilities and competencies as implementation mechanisms across these priorities. Many of the strategy's intended outcomes, including whole-life carbon reduction, design-for-disassembly, passive survivability, operational affordability, and innovation demonstration, are determined at early project design stages. The draft references standards and procurement requirements but does not clarify how professional design scope, procurement evaluation, and project delivery models will embed these expectations in practice.	Add an integrated implementation action under Goal 13 and cross-reference it under Goals 15 and 16 that engages architects; Requires consideration of whole-building life cycle assessment during design phases of federally funded projects. Encourages inclusion of circular design principles, including adaptability, durability, and design-for-disassembly, in project requirements. Incorporates life-cycle cost analysis alongside carbon metrics in federal construction decision-making. Encourages resilience-informed design standards addressing passive survivability, extreme heat, wildfire smoke, power interruption, and risks from other extreme weather events. Aligns procurement evaluation criteria with demonstrated expertise in whole-life carbon reduction, resilience design, and circular economy integration. Supports federal infrastructure projects as innovation and demonstration platforms, with transparent reporting of performance outcomes and lessons learned. Partnerships with professional associations and regulatory bodies to scale climate competency training aligned with federal standards and evolving requirements.		
Goal 13, 15, 16 and introductory section	Make the built environment a clearly named delivery pathway across FSDS goals. The draft FSDS recognizes buildings as a high-emissions sector and references housing, energy efficiency, and federal construction standards, but it does not consistently position the built environment as a cross-cutting delivery pathway for climate mitigation, resilience, health, affordability, and equity outcomes.	Add explicit cross-references within relevant goals (not only climate and housing) that identify the built environment and design quality as enabling mechanisms for outcomes such as: health and well-being, poverty reduction through lower energy costs, resilience to climate disasters, and inclusive communities. Ensure implementation strategies consistently reference whole-life performance of buildings (operational + embodied impacts) where relevant.	Buildings and construction are globally material to emissions and resource demand, so treating the built environment as a cross-cutting lever improves coherence and implementation effectiveness. It also aligns with RAIC CAP priorities to advocate for policy pathways and accelerate practice transformation.	Global ABC reopprts; IPCC;

Goal 13; implementation strategy refrencing greening govt strategy	Strengthen whole-life carbon action (embodied carbon + operational carbon) beyond federal assets. The draft FSDS references the federal “Standard on Embodied Carbon in Construction” through the Greening Government Strategy, but the approach is largely framed as a federal-operations measure rather than a scalable national market signal and harmonized pathway.	Add an FSDS implementation strategy to scale embodied-carbon measurement and reduction beyond federal projects by supporting harmonized, Canada-wide approaches to whole-building life cycle assessment (WBLCA) and material disclosure. Clarify how federal standards and procurement signals will be leveraged to accelerate market transformation (for example, alignment with codes, guidance, and data infrastructure).	Embodied carbon is a significant component of whole-life building emissions, and procurement standards can drive market transformation when coupled with consistent measurement methods and transparency. This is consistent with RAIC CAP’s emphasis on policy pathways and climate competencies.	-FSDS cites requiring applicable federal construction projects to comply with the embodied carbon standard. -Treasury Board policy notices and Greening Government Strategy describe the standard and its updates including WBLCA. -Canada’s Commissioner of the Environment and Sustainable Development has examined greening of building materials in public infrastructure.	
Goal 13 and any technical references to LCA	Clarify the LCA method basis and data requirements for credibility and comparability. The draft FSDS references embodied carbon compliance but does not specify methodological expectations for life cycle assessment and disclosure (for example, consistency, comparability, and assurance requirements), which risks inconsistent reporting and weak accountability.	Add language in relevant implementation strategies stating that whole-building and product-level assessments should follow recognized LCA standards and include transparent reporting and, where appropriate, independent review for major projects. (This can be phrased as “consistent with internationally recognized LCA standards.”)	LCA results are sensitive to scope, assumptions, and system boundaries. Standardized requirements improve comparability, reduce greenwashing risk, and strengthen procurement and policy decisions.	-ISO 14044 specifies requirements and guidelines for LCA. -IPCC notes the importance of robust approaches for mitigation in buildings, including efficiency and material-related measures.	
Goal 13	Use federal procurement as a stronger market signal (transparency, disclosure, and predictable demand). The draft FSDS references the Policy on Green Procurement and the embodied carbon standard for construction through Greening Government Strategy implementation. There is an opportunity to strengthen market pull by clarifying disclosure expectations, data transparency, and how procurement will create predictable demand for lower-carbon solutions.	Add explicit commitments to transparent reporting on embodied carbon outcomes in federal construction (aggregated reporting that supports market learning). Clarify the planned use of WBLCA in project decision-making (not only compliance). Link procurement standards to capacity-building for suppliers, especially in regions and community contexts where supply constraints are recognized.	Procurement is a powerful lever for market transformation, particularly when paired with transparency and consistent methods. FSDS already frames procurement as part of the Greening Government Strategy approach, so adding transparency and learning mechanisms strengthens accountability without changing the overall architecture of the draft.	FSDS procurement references and embodied carbon compliance language. Treasury Board notices on embodied carbon and WBLCA updates.	
Goal 13 implementation strategies	Accelerate Deep Retrofits and broad-scale Building Performance and climate resilience improvements. The draft FSDS notes the risk that skills shortages, costs, and low awareness could slow retrofits and net-zero construction, and it references federal efforts including the Deep Retrofit Accelerator Initiative and home energy labelling. However, it does not clearly articulate how outcomes will be measured in the building stock (for example, performance-based targets or pace-of-retrofit indicators).	Add an implementation strategy under emissions reduction to: Expand support for deep retrofits across building types (including multi-unit residential and institutional). Strengthen workforce capacity measures linked to retrofit delivery. Add (or reference) performance-based indicators for buildings (for example, progress metrics tied to retrofit depth, building energy performance improvement, or emissions reductions in buildings).	Retrofitting existing buildings is widely recognized as essential for near-term emissions reductions in the buildings sector, and workforce and market transformation are repeatedly identified barriers.	-FSDS references retrofit barriers and programs. -NRCan describes the Deep Retrofit Accelerator Initiative and retrofit accelerator approach. -IPCC identifies large mitigation potential in buildings.	
Goal 13	Embed climate and disaster resilience in housing and community infrastructure with clearer built-environment actions. The draft FSDS includes an implementation strategy to promote building in low-risk areas, updated codes and guidance for climate and disaster resilience, and low-carbon materials and designs for housing. It also includes targets related to households factoring climate change into decision making and organizational climate risk assessments. Missing - how design and planning capabilities (including architects and allied professionals) will be mobilized to operationalize resilience at scale nor the importance of assessing community or district scale resilience in concert with individual buildings.	Add language explicitly recognizing the role of design and planning professionals in translating risk information, codes, and standards into resilient housing and public infrastructure. Add an implementation action to support practical resilience guidance and capacity-building for housing delivery partners (including community housing providers and Indigenous-led housing organizations), aligned with the strategy’s emphasis on culturally appropriate, community-driven solutions.	Implementation depends on capacity and translation of standards and risk information into built outcomes. This aligns with FSDS attention to climate-disaster impacts and with RAIC CAP principles, including integrating social justice and reconciliation in climate-related work.		0

Goal 15, 16	Strengthen Circular Economy Actions for Construction Materials. The draft FSDS includes a circular economy framing and acknowledges inconsistent data on waste flows and the need for long-term investments and collaboration. However, it is not explicit about construction and demolition material flows, which are major leverage points for circularity in the built environment.	Add an implementation strategy (or explicit sub-action) under the circular economy goal that: Establishes a pathway to measure and reduce construction and demolition waste, including separate tracking of material stream for reuse versus recycling Promotes reuse and high-value material recovery (for example, deconstruction and secondary material markets). Improves national data consistency for major material streams relevant to buildings. Promotes and supports the growth of material recovery and exchange sectors and the development of circular economy databases.	A circular economy approach requires reliable data and targeted action in high-volume material streams. Buildings and construction are material to both emissions and resource use, so including construction materials directly strengthens alignment between climate and circular economy outcomes.	FSDS circular economy framing and data issues. UNEP Global Status Report highlights the sector's dependence on carbon-intensive materials and the material footprint implications.
Goal 13	Use federal procurement as a stronger market signal (transparency, disclosure, and predictable demand). The draft FSDS references the Policy on Green Procurement and the embodied carbon standard for construction through Greening Government Strategy implementation. There is an opportunity to strengthen market pull by clarifying disclosure expectations, data transparency, and how procurement will create predictable demand for lower-carbon solutions.	Add explicit commitments to transparent reporting on embodied carbon outcomes in federal construction (aggregated reporting that supports market learning). Clarify the planned use of WBLCA in project decision-making (not only compliance). Link procurement standards to capacity-building for suppliers, especially in regions and community contexts where supply constraints are recognized.	Procurement is a powerful lever for market transformation, particularly when paired with transparency and consistent methods. FSDS already frames procurement as part of the Greening Government Strategy approach, so adding transparency and learning mechanisms strengthens accountability without changing the overall architecture of the draft.	FSDS procurement references and embodied carbon compliance language. Treasury Board notices on embodied carbon and WBLCA updates.
Goal 13	Sustainable Communities and Complete Neighbourhoods. The strategy emphasizes emissions reduction and housing supply but does not strongly articulate the critical role that urban form, land use integration, transportation planning, urban ecosystems, and complete communities play in achieving improved climate, biodiversity, and social outcomes.	Architects can: As leaders in climate-responsive urban design and integrated community planning As partners in advancing compact, transit-oriented, low-carbon neighbourhoods As contributors to co-benefits including health, affordability, and social cohesion Add an explicit implementation action under Goal 2.5 (Sustainable Transportation) and cross-reference it under Goals 2.3 (Housing) and 3.1 (GHG Emissions) that: • Identifies urban form, land use integration, and complete community design as enabling mechanisms for achieving climate mitigation, housing affordability, and social cohesion outcomes. • Requires that federally supported housing and infrastructure investments integrate transit-oriented, compact neighbourhood design principles to reduce long-term transportation emissions and infrastructure intensity. • Recognizes architects and urban designers as key	Urban form influences long-term emissions trajectories through transportation demand, infrastructure intensity, and energy use. IPCC identifies compact urban design and demand-side strategies as high-impact mitigation pathways. Urban form is a long-cycle determinant of GHG emissions through transportation demand, infrastructure intensity, and building energy use. IPCC identifies compact urban design and demand-side measures as high-impact mitigation pathways. The FSDS emphasizes housing supply and emissions reduction, but omits the spatial and design dimensions that lock in (or reduce) emissions over decades. Integrating complete community principles strengthens coherence across climate, housing, and social goals, and aligns with RAIC CAP priorities to advocate for policy pathways that recognize design quality as a public good.	IPCC Sixth Assessment Report, Working Group III (2022) - Chapter 8: Urban Systems and Other Settlements. RIBA and AIA research on integrated community design and emissions. RIAC Climate Action Plan (CAP) guiding principles and focus areas.
General	Health, Well-Being, and Indoor Environmental Quality. The draft strategy acknowledges climate-related health impacts but does not strongly link indoor environmental quality, passive survivability, and resilient building design to public health outcomes.	Architects can: Design buildings that are more resilient to the increasing impacts of climate change such as heat waves, wildfire smoke, and power outages Enhance indoor air quality and passive survivability Support mental health through daylight, access to nature, and community design	Heat and smoke events are increasing in Canada. Building design is a frontline adaptation measure.	

		Add an explicit cross-reference within Goal 3.2 (Climate Adaptation) and Goal 1.3 (Reduce Poverty) that identifies building design as a frontline climate adaptation and public health measure. Specifically: • Add language recognizing that passive survivability design—buildings that maintain habitable conditions without active mechanical systems during extreme heat, wildfire smoke, and power outage events—is a critical and cost-effective adaptation strategy. • Add an implementation action supporting development of federal guidance on passive survivability performance thresholds for housing and public buildings, particularly for vulnerable populations. • Recognize indoor environmental quality (daylight, ventilation, access to nature, acoustic comfort) as a public health co-benefit of climate-resilient building design, linking built environment outcomes to health and well-being goals. • Support capacity-building for housing providers, including Indigenous-led and community housing organizations, to integrate passive survivability into project planning and design briefs.	Heat waves, wildfire smoke events, and power interruptions are increasing in frequency and severity across Canada. Further, research confirms that the elderly, chronically ill, or living in socially or materially deprived neighbourhoods are disproportionately impacted. Buildings that are designed for passive survivability reduce mortality risk and emergency service demand during extreme climate events. These outcomes are primarily determined through design decisions made before construction, and require architects and other design professionals to be explicitly engaged as delivery partners. Linking indoor environmental quality to health and poverty-reduction goals also strengthens the cross-sectoral coherence of the FSDS and aligns with RAIC CAP principles of social justice and intergenerational equity.	Health Canada research on heat-related illness and building performance. IPCC AR6 WGII - Chapter 7: Health, Well-Being, and the Changing Urban Environment. Passive Survivability standard references (e.g., Trane, Rocky Mountain Institute, Passive House Institute). RIAC Climate Action Plan guiding principles.
Goal 2.1; Implementation strategy 2.1.1.6; Goal 3.1 implementation strategies	Workforce Capacity and Climate Skills. The strategy references retrofit barriers and workforce constraints but does not identify professional education and accreditation systems as implementation tools.	Strengthen implementation strategy 2.1.1.6 (skills development for sectors critical to sustainable growth) to explicitly include: • Recognition of regulated design professions—architects, landscape architects, engineers, and allied professionals—as key delivery agents for clean economy and climate resilient net-zero building outcomes, whose professional education and accreditation systems are underutilized levers for scaling climate competency nationally. • A commitment to engage professional regulatory bodies and associations to align continuing education requirements with federal sustainability standards, building codes, and procurement expectations on an ongoing basis. • Support for post-secondary architecture and design programs to integrate whole-life carbon, resilience, circular economy, and Indigenous knowledge into core curriculum, consistent with federal climate priorities.	The FSDS references skills shortages as a barrier to retrofit delivery and clean growth (Implementation strategy 2.1.1.6), but frames workforce capacity primarily in terms of skilled trades and clean technology sectors. Professional design education and accreditation are complementary and equally important levers: climate performance outcomes in buildings are predominantly determined at early design stages, requiring architects and allied professionals with current competency in whole-life carbon, resilience, and circularity. Professional associations and accreditation bodies can scale this capacity efficiently through structured continuing education aligned with federal standards and evolving procurement requirements.	FSDS Implementation Strategy 2.1.1.6 (skills development for sustainable growth sectors). RIAC Climate Action Plan: Climate Competencies and Education as a strategic focus area. Canadian Architectural Licensing Authorities (CALA) - architectural education and accreditation framework. Canadian Centre for Architecture and NRC research on professional capacity gaps in building sector decarbonization.

Goal 3.1; Implementation strategy referencing Standard on Embodied Carbon in Construction; Goal 2.1 (clean growth / clean technology sector)	Leverage Federal Procurement and Embodied Carbon Standards to Advance Canadian Low-Carbon and Biobased Materials. The draft FSDS references the Standard on Embodied Carbon in Construction as a compliance requirement for applicable federal projects. However, it does not identify Canadian-produced, low-carbon, and biobased materials - including mass timber, engineered wood products, and other bio-based building materials sourced from responsibly managed Canadian forests - as a strategic priority. This represents a missed opportunity to simultaneously advance embodied carbon reduction, domestic industry development, rural and Indigenous economic opportunity, and carbon storage in the built environment. Federal procurement has the scale to create predictable demand signals that accelerate market development for these material categories nationally.	Add an implementation strategy (or sub-action) under Goal 3.1 that: • Explicitly recognizes Canadian-produced, low-carbon, and biobased materials - including mass timber, cross-laminated timber (CLT), and other engineered wood and bio-based products - as preferred material choices in federally funded construction and renovation projects where structurally and functionally appropriate. • Directs federal departments to prioritize materials with verified lower embodied carbon and documented biogenic carbon storage benefits in whole-building life cycle assessments (WBLCA) for federal projects. • Links federal embodied carbon procurement standards to market development support for Canadian low-carbon material producers, particularly in regions and Indigenous communities where forest-based economies are central to local prosperity. • Commits to transparent reporting of material choices and embodied carbon outcomes in federal construction to build market data, normalize disclosure, and strengthen future procurement baselines. Cross-reference this action under Goal 2.1 (clean growth / clean technology sector) and Goal 2.2 (sustainable agriculture and forestry), recognizing that forest-based materials and bio-based building products represent a significant clean growth opportunity aligned with Canada's managed forest resources.	Embodied carbon—the emissions associated with material extraction, manufacturing, transport, and construction—accounts for a significant and growing share of whole-life building emissions as operational energy performance improves. Biobased materials such as mass timber, CLT, and other engineered wood products can offer substantially lower embodied carbon than conventional concrete and steel alternatives, and can store biogenic carbon for the building's service life. Canada has a comparative advantage in responsibly managed, certified forest resources and an existing mass timber manufacturing sector. Federal procurement at scale can send credible, predictable market signals that stimulate investment in low-carbon material supply chains, benefit rural and Indigenous forest communities, and demonstrate leadership aligned with Canada's net-zero and clean economy commitments. This aligns with RAIC CAP priorities including embodied carbon reduction, policy pathways, and reconciliation through economic co-benefits for Indigenous communities.	FSDS references to Standard on Embodied Carbon in Construction (TBS / Greening Government Strategy). Canada Green Building Council (CAGBC) - Mass Timber and Zero Carbon Building research. NRCan - Canadian Forest Products and Wood Products Market Development programs. IPCC AR6 WGIII Chapter 7: Buildings - material efficiency and biogenic carbon storage. UN Environment Programme - Global Status Report for Buildings and Construction (2022). Canadian Wood Council - embodied carbon and life cycle assessment data for wood products. Commissioner of the Environment and Sustainable Development - greening of building materials in public infrastructure.
General	"Indigenous leadership" only mentioned once	Strengthen language regarding recognizing Indigenous inherent rights to self-determination and self-governance. Strengthen reference to the inclusion of Indigenous knowledge keepers and Indignous knowledge systems and sciences in the development of pathways forward throughout the strategy. **NOT ONLY** "Indigenous Knowledge" (for this see more below) but also explicitly "Indigenous leadership" and "self-determination"	Transformative approaches required (e.g. per IPBES, 2024) require not just inclusion of Indigenous Knowledges in Western-led approaches; but Indigenous leadership - capable of transcending the epistemic and axiological limitations and biases keeping Western models locked in externalizing, degenerative patterns.	UNDRIP, 2007 UNDA, 2021 • For our Future (Reed et al, for NRC 2024) • Indigenous Leadership should be at the centre of the climate discussion (Canadian Climate Institute, 2025)
General	Only 2 references to "Indigenous Knowledge"	Strengthen reference	Explicitly recognize capacity of IKS to better understand complex systemic issues and respond holistically. Critical to not merely "integrate" (which too often is taken to mean tacking onto existing Western framings) but instead ethically weave as an equally valid, if not more sophisticated way of knowing and responding	• There is no word for 'nature' in our language: rethinking nature-based solutions from the perspective of Indigenous Peoples in Canada (Reed et al, 2024) • IPBES Transformative Change Assessment report (2024) • Recommendations for the ethical and equitable engagement of Indigenous Knowledge Systems within the IPCC (Sherpa, Reed, et al for IWGIA 2026) • From Risk to Resilience: Indigenous Alternatives to Climate Risk Assessment in Canada (Wale & Huson, 2024)
General	No mention of "cumulative impacts"	Recognize cumulative impacts in relation to all indicators	Cumulative impacts are the holistic impacts from decisions - past, present and future potential. They enable systemic consideration of cause-effect relationships. Not considering cumulative impacts is like looking through a toilet-paper role.	• There is no word for 'nature' in our language: rethinking nature-based solutions from the perspective of Indigenous Peoples in Canada (Reed et al, 2024) • For our Future (Reed et al, for NRC 2024) • From Risk to Resilience: Indigenous Alternatives to Climate Risk Assessment in Canada (Wale & Huson, 2024)

General	No mention of "cost(s) of inaction"	Recognize costs of inaction	Without recognizing true costs, decision-making logics are profoundly - and ppotentially catastrophically - flawed.	• ...and for one of any number from recent headlines: Buckle Up: El Niño is brewing (National Observer, March 23, 2026) • Adressing Climate Inaction as our greatest threat to sustainable development (Mackay et al, 2025) • The Costs of Climate Change: five report series (Canadian Climate Institute, 2020-2022) • The Cost of Inaction (Climate Policy Initiative, 2024) • The economics of immense risk, urgent action and radical change: towards new approaches to the economics of climate change (Stern, Stiglitz, et al, 2020) • Fatal Calculations: how economics has underestimated climate damage and encouraged enaction (Spratt & Armistead, 2018)
	Only 1 mention of "natural infrastructure"; no mention of "natural assets"; no mention of nature-based solutions / NBS	Recognize the signicificant (cascading and cumulative) benefits provided by natural assets / aka natural infrastructures	Cascading and cumulative co-benefits for low-carbon resilience (i.e. mitigation + adaptation) - including (but not limited to): carbon sequestration, flood mitigation (lessoning coastal wave energy, increasing infiltration inland), water purification, biodiversity, mitigating urban heat island, improving physical and mental wellbeing which inturn alleviates pressures on critical/emergency services (hospitals, fire, etc).	• The Price of Nature (NAI, 2024) • Why Nature Matters (Himes et al, 2023) • Summary for policymakers of the Methodological Assessment Report of the Impact and Dependency of Business on Biodiversity and Nature's Contributions to People (2022). DOI: https://doi.org/10.5281/zenodo.15369060
General / All Goals	Built Environment as a Cross-Cutting System	Not framed as a system-wide lever; = Position the built environment as a cross-cutting implementation domain across all FSDS pillars.	Land use, buildings, and infrastructure drive emissions, resilience, affordability, and productivity outcomes.	
Goal 2.3	Industrialized Housing Delivery	No explicit support for prefabrication or system-based delivery; = Integrate prefabrication, modular systems, and DfMA into 2.3.1.1 ; Support standardized mid-rise (4–8 storeys) typologies; Align with CMHC programs	Directly addresses productivity, labour, and delivery constraints.	
Goal 3.1	Embodied Carbon & LCA	Limited to federal assets; no economy-wide framework; = Extend requirements to federally funded projects ; Mandate whole-life carbon assessment (LCA) ; Support low-carbon material supply chains;	Prevents long-term carbon lock-in and aligns with global best practice	
Goals 3.2 & 2.3	Climate Resilience through Design	Insufficient integration at building and community scale; = Require early-stage climate risk-informed design ; Promote bioregional planning; Integrate passive and nature-based solutions	Translates policy into measurable built resilience outcomes	
General / All Goals	Design Quality as a Performance Driver	Design quality absent from performance framework; = Recognize design excellence as a public value ; Promote integrated design (IPD) ; strengthen federal design leadership	Ensures durable, high-performing, and socially effective environment	