



Lisa French
Vice-President, Sustainability Standards
Canadian Sustainability Standards Board (CSSB)
277 Wellington Street West
Toronto, ON M5V 3H2

April 7th, 2025

Re: Proposed 2025-2028 Strategic Plan Consultation

Dear Ms French,

Thank you for the opportunity to provide input on the Canadian Sustainability Standards Board's (CSSB) proposed 2025-2028 Strategic Plan. We commend the CSSB's leadership in advancing high-quality, globally aligned sustainability disclosure standards and appreciate its commitment to fostering transparency, accessibility, and alignment in Canada's sustainability reporting landscape.

We support the CSSB's focus on:

- **The broader adoption and integration of CSDS 1 and CSDS 2:** Aligning Canada with global best practices to enhance investor confidence in material sustainability disclosures.
- **Regulatory engagement:** Encouraging mandatory disclosure requirements that align with the CSDS 1 and CSDS 2 and promoting consistency across reporting entities. CSSB should proactively support progress on the evolution towards mandatory disclosure which will position Canada and Canadian companies to be competitive and attractive to a wide range of global investors.
- **Improved accessibility:** Addressing barriers such as the Chartered Professional Accountants (CPA) Canada paywall. Full public access to the CSSB standards, webinars, FAQs and other material should be made available to encourage wide engagement and uptake of the standards.
- **More educational engagement:** Providing interactive webinars, Q&A desks, best practice examples and roundtables to support companies of all sizes in navigating disclosure requirements. There are a wide number of organizations and academic institutions that CSSB could partner with on these types of sessions including the Institute for Sustainable Finance, the Canadian Climate and Law Initiative, the Responsible Investor Association and the Institute for Corporate Directors, amongst many others.
- **Indigenous inclusion:** Integrating Indigenous rights, knowledge, and governance perspectives within the CSDS framework versus separately will ensure consistent recognition of UNDRIP and FPIC (Free Prior and Informed Consent) across reporting organizations.
- **Global interoperability:** Engaging with international standard-setting bodies, including the ISSB and the UK's Transition Plan Taskforce, to align Canada's sustainability disclosure practices. We encourage the CSSB to take a role in facilitating input from Canadian stakeholders to the ISSB's biodiversity research projects as this could support alignment with the federal government's commitment to the Kunming-Montreal Global Biodiversity Framework in 2022.



These priorities are critical to ensuring that sustainability standards are widely adopted, effectively implemented, and support Canada's transition to a more sustainable economy.

We also encourage the CSSB to consider augmenting the Strategic Plan in the following ways:

- **CSSB Mission** - Provide additional clarity on what it means to “serve the public interest” including a reference to being focused on best available scientific evidence as the foundational guidance for sustainability disclosures which is critical for ensuring long-term investor confidence. It would also be helpful to have the CSSB not just “maintain” high quality disclosure standards but to “contribute” to the ongoing development and evolution of sustainability disclosure standards. This would place the CSSB into a more leading role as sustainability standards evolve and is more aligned with Canada hosting one of the ISSB offices in Montreal.
- **Measurable Outcomes** - We look forward to seeing additional developments between the priorities, objectives and measurable outcomes to understand the implementation efforts that the CSSB will undertake in the revisions to the Strategic Plan. For example, an outcome could be the adoption of the CSDS2 standard by #% of Canadian companies by 2030, or X Canadian regulators commitment to use the CSDS standards as part of their requirements by 2030.
- **Indigenous Matters** - We encourage CSSB to enhance their commitment and processes related to developing Indigenous perspectives and principles into the standards. Critical is to follow the principles of FPIC - Free Prior and Informed Consent ('nothing about us, without us'). This means that Rights Holders or their delegates must be given the time and the due process to propose Indigenous elements of the standards through an appropriate governance and input process that encompasses diverse views and perspectives from across Canada and communities. It must allow for a timeframe to gather those perspectives. Recognizing this may require resources and time, we would encourage CSSB to allow for this and not rush to provide guidance in this area prematurely, as it risks perpetuating mistrust and lack of confidence from Indigenous communities in the standards over the long-term.

We would also like to direct you to the detailed [submission to the CSSB by the Canada Climate Law Initiative](#) and the rationale underpinning CCLI's recommendations. We believe the CSSB's proposed strategic plan represents an important step in advancing corporate sustainability reporting, and we appreciate the opportunity to contribute to this consultation.

Sincerely,

Andrea Moffat
Senior Director, Investment Stewardship
Addenda Capital