



Lisa French
Vice-President, Sustainability Standards
Canadian Sustainability Standards Board (CSSB)
277 Wellington Street West
Toronto, Ontario M5V 3H2
Sent via email: lfrench@frascanada.ca

Subject: ABPA Response to CSSB's "Indigenous Matters: What We Heard"

Dear Ms. French,

The ABPA is deeply committed to ensuring that Indigenous perspectives are fully integrated into sustainability standards. We acknowledge receipt of the CSSB's 'Indigenous Matters: What We Heard' report and are encouraged by the recognition of several key recommendations from our June 10, 2024, letter and supplementary "Indigenous Impact Report Volume 1."

We particularly commend the CSSB's commitment to:

- **Meaningful Indigenous participation:** Including ongoing learning, engagement, and partnership with Indigenous Peoples.
- **Education and cultural awareness:** Providing training for CSSB board and staff on First Nations, Metis, Inuit peoples' rights and the complexities of disclosure for Indigenous Peoples, and the importance of the United Nation Declaration of the Rights and Indigenous peoples and free, prior, and informed consent.
- **Deeper consultation and transparency:** Addressing gaps in responses and ensuring fuller representation of diverse Indigenous voices.

However, to ensure the meaningful integration of Indigenous perspectives and rights into sustainability disclosure standards, we urge the CSSB to strengthen its commitments in the following areas:

- **Operationalizing Indigenous Participation:** Move beyond acknowledgment and establish concrete mechanisms for Indigenous Peoples to actively shape sustainability standards. This includes a stronger engagement plan with the Assembly of First Nations, Political Territorial Organizations like the Chiefs of Ontario and other regional Indigenous organizations to co-develop processes for standards that impact First Nations, Metis, and Inuit rights and interests.

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- **Ensuring Cultural Dexterity:** While Indigenous representation on the CSSB board is essential, it is not sufficient to guarantee cultural dexterity. There needs to be a mechanism that involves recognizing and respecting cultural differences, adapting the CSSB to various cultural contexts of First Nations, Metis, and Inuit. It goes beyond mere awareness and requires active engagement and a willingness to learn and adapt. There is a unique opportunity to leverage the Public Sector Accounting Board's (PSAB) Indigenous advisory body, and to also consider the recruitment of an Indigenous chairperson.
- **Specificity in Addressing "Redwashing":** Develop clear guidelines and criteria for companies to demonstrate genuine commitment to reconciliation by moving Truth and Reconciliation Commission Call to Action #92 into policy. This will also require including Indigenous-led and developed guidance on appropriate use of Indigenous knowledge and terminology, and metrics to assess the tangible socio-economic impacts of corporate activities on Indigenous communities and peoples.
- **Implementation and Accountability:** Develop a clear implementation plan with timelines and deliverables for addressing the recommendations outlined in the "What We Heard" report.
- **Obligations of Serving the Public Interests:** The CSSB's approach to evaluating public interest must evolve alongside the growing understanding of Indigenous rights and reconciliation. The current methods are inadequate because they often rely on outdated and incomplete information, hindering the achievement of true sustainability. The CSSB must actively engage with Indigenous communities and knowledge keepers to ensure that sustainability standards reflect the needs and aspirations of all Canadians.
- **Reconciliation Action Plans:** today there are more than 30 Indigenous reconciliation action plans developed by corporations across Canada. These plans must go beyond corporate social responsibility initiatives, enable policy change and specific, measurable, achievable, relevant, and time-bound goals to address the unique needs and rights of Indigenous communities. The CSSB has a role to play to work with Indigenous leaders to raise the status quo.

A key recommendation for Indigenous-led Independent Verification

To further strengthen the integrity and accountability of sustainability disclosures, we strongly recommend the establishment of an Indigenous-led verification process that is independent of the CSSB. This process will empower Indigenous communities to independently assess and verify corporate claims regarding social impacts and economic benefits related to Indigenous peoples. Indigenous-led verification will not only enhance transparency but also foster trust and ensure that sustainability standards genuinely contribute to reconciliation and the well-being of Indigenous communities.

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In Ontario, Waawoono Consultancy has been developing sustainability reporting frameworks for corporate clients, specifically addressing the unique environmental and social considerations of the region, such as resource extraction, Aboriginal and Treaty rights, Indigenous values, and remote community dynamics. This experience could offer valuable guidance for developing a process and benchmark for other jurisdictions.

We urge the CSSB to take immediate action to implement these recommendations, ensuring that sustainability standards truly reflect the needs and rights of Indigenous communities.

We believe that by working together, we can create standards that contribute to a more sustainable and equitable future for all Canadians.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Rasevych", written in a cursive style.

Jason Rasevych
Anishnawbe Business Professional Association

CC:

National Chief Cindy Woodhouse Nepinak, Assembly of First Nations
Ontario Regional Chief Abraham Benedict, Chiefs of Ontario
Grand Chief Alvin Fiddler, Nishnawbe Aski Nation
Anishnawbe Business Professional Association Board of Directors

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