

Report 1

Reports of the Commissioner of the Environment and Sustainable Development to the Parliament of Canada

National Adaptation Strategy



Independent Auditor's Report | 2025



Office of the Auditor General of Canada

Bureau du vérificateur général du Canada

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At a Glance



Overall message

As our climate changes and impacts such as heat waves, floods, droughts, and wildfires become more frequent and more devastating, countries around the world, including Canada, are developing and implementing plans and strategies to help adapt to our changing climate.

Given the scale of the challenge, engagement from all levels of government and civil society as well as the private sector and all Canadians is critical to Canada's ultimate success in adapting to climate change. The federal government plays a key leadership role to ensure that adaptation actions across the country are coordinated, effective, and efficient.

Canada released its National Adaptation Strategy in 2023, which is an important first step. However, it was one of the last countries of the Organisation of Economic Co-operation and Development to do so. Timely action on adaptation measures is important because the costs of climate-related events continue to rise, meaning Canadians will pay more to adapt the longer we delay action.

Overall, we found that Environment and Climate Change Canada, working with Health Canada; Housing, Infrastructure and Communities Canada; Natural Resources Canada; and Public Safety Canada, did not effectively design the National Adaptation Strategy. The strategy did not prioritize Canada's climate change risks. It also did not include an economic analysis to assign appropriate resources and an effective framework for measuring, monitoring, and reporting results. Some targets for key health risks, such as Lyme disease and wildfire smoke, were missing from the Government of Canada Adaptation Action Plan. Although it is early days for implementation, we found that Environment and Climate Change Canada, working with key partners, had not yet established 2 of the 3 key implementation components: the Federal, Provincial and Territorial Bilateral Action Plans and the Indigenous Climate Leadership Agenda.

The Government of Canada Adaptation Action Plan that was released alongside the strategy sets out the federal government's contributions and was to be the centrepiece component of the National Adaptation Strategy. We found that the plan was neither systematic nor comprehensive. The 73 actions included in the plan were a mix of new and existing federal programming, and Environment and Climate Change Canada did not know the total federal funding commitments made for them. We found that there were few early actions in place within the 7 key programs assessed. Furthermore, Environment and Climate Change Canada will report only once on progress before the next iteration of the strategy planned for 2030. Reporting on progress sooner and more regularly is important so that Environment and Climate Change Canada can know whether the National Adaptation Strategy is effective and how to course correct as needed.

An improved National Adaptation Strategy and timely action to adapt to our changing climate and extreme weather are critical to protect the health, safety, and livelihoods of Canadians.

Key facts and findings



- Since 2015, the Government of Canada has invested over \$6.6 billion in climate adaptation-related efforts.
- Environment and Climate Change Canada estimated that for every dollar spent on proactive adaptation measures, between \$13 and \$15 can be saved in the long term.
- Canada's greatest climate risks had not been systematically prioritized.
- Two of the 3 National Adaptation Strategy components had not yet been established and the only component in place, the Government of Canada Adaptation Action Plan, had gaps.
- The framework for measuring, monitoring, and reporting was insufficient. For example, Environment and Climate Change Canada planned to issue only 1 progress report before 2030.

See [Recommendations and Responses](#) at the end of this report.

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Introduction

Background

National Adaptation Strategy

1.1 Canada's climate is changing rapidly, with widespread impacts such as more frequent and devastating events like heat waves, floods, droughts, and wildfires. This instability is caused by warming temperatures and changing precipitation, which are affecting communities across Canada from coastal areas experiencing sea-level rise to the North with the disappearance of ice and snow. The growing magnitude and scale of these impacts is also leading to increased economic and social costs for Canadians. For example, the insurable costs, which are only a portion of the total cost of these events for Canadians, had dramatically increased ([Exhibit 1.1](#)). Furthermore, the return on investment for adaptation actions is significant. Environment and Climate Change Canada estimates that for every dollar spent on proactive adaptation measures, between \$13 and \$15 can be saved in the long term.

1.2 In 2016, Canada ratified the Paris Agreement, which specifies the need for countries to develop a national adaptation plan outlining ambitious efforts. In 2020, as part of its strengthened climate plan, A Healthy Environment and a Healthy Economy, the Government of Canada committed to developing Canada's first National Adaptation Strategy with provincial, territorial, and municipal governments; Indigenous peoples; and other key partners.

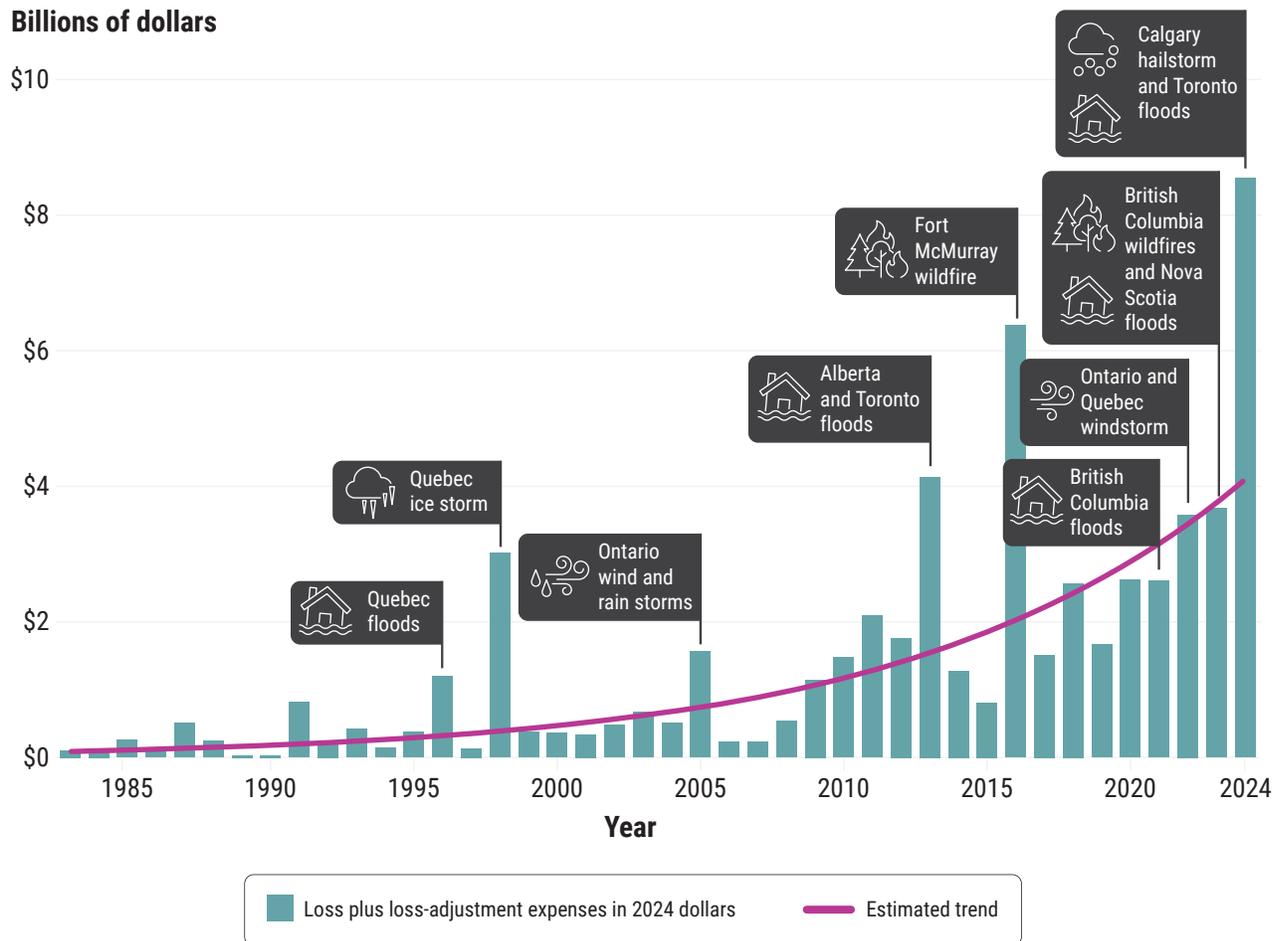
1.3 In January 2021, the Minister of Environment and Climate Change was tasked to work with the Minister of Natural Resources, the Minister of Public Safety and Emergency Preparedness, the Minister of Infrastructure and Communities, and others to develop a national climate change adaptation strategy. Following a 2-year consultation and comment period, the final National Adaptation Strategy was released in June 2023.

1.4 The National Adaptation Strategy was meant to establish a shared vision for climate resilience in Canada and to set out **whole-of-society**¹ objectives and targets for more coordinated and strategic climate change adaptation action across Canada.

¹ **Whole-of-society**—A whole-of-society approach embraces both formal and informal institutions in seeking a generalized agreement across society about policy goals and the means to achieve them.

Source: United Nations

Exhibit 1.1—Insurable losses in Canada due to extreme weather events from 1983 to 2024



Note: An insurable loss is 1 extreme weather event costing \$30 million or more. For 1983 to 2022, losses were quoted in the 2023 Insurance Bureau of Canada Fact Book and adjusted using the inflation calculator (Bank of Canada) to 2024 dollars. For 2023 and 2024, losses were quoted on the Insurance Bureau of Canada website.

Source: Adapted from data from the Insurance Bureau of Canada and CatIQ

Read the Exhibit 1.1 text description

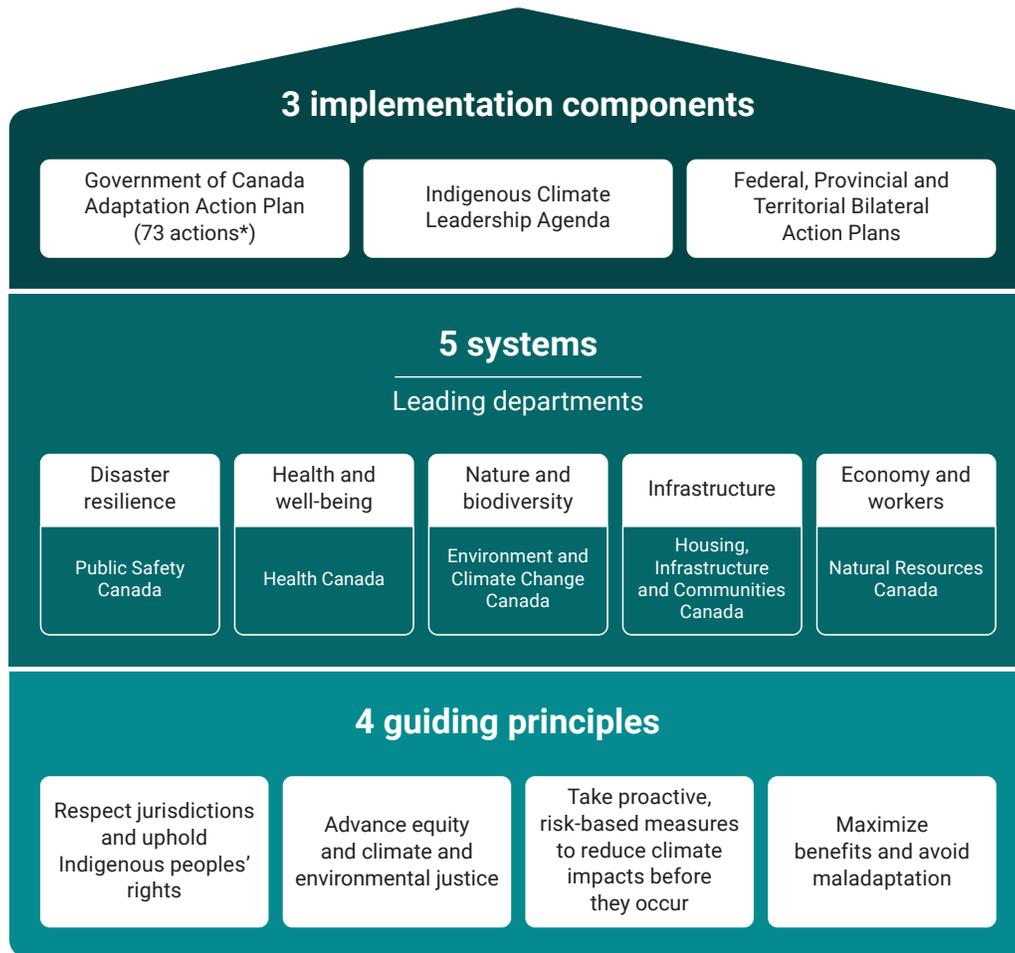
1.5 The National Adaptation Strategy included 3 implementation components: the Government of Canada Adaptation Action Plan; the Indigenous Climate Leadership Agenda; and Federal, Provincial and Territorial Bilateral Action Plans. It also included 5 systems assigned to each leading department ([Exhibit 1.2](#)).

1.6 The strategy also had foundational elements that included cross-cutting objectives to support resilience across the 5 systems. This was underpinned by 4 guiding principles meant to inform the design of policies and programming.

1.7 Climate change can disproportionately impact certain populations and communities. For example, during the 2021 extreme heat event in British Columbia, of the 619 people who died, 67% were

over 70 years old, 61% lived in low-income neighbourhoods, and 56% lived alone. Ensuring that adaptation efforts prioritize populations and communities at greater risk of climate impacts is at the heart of the 4 guiding principles, which include ensuring that disproportionately affected groups are considered.

Exhibit 1.2—The National Adaptation Strategy whole-of-society structure



* Actions include programs and initiatives.

[Read the Exhibit 1.2 text description](#)

Roles and responsibilities

1.8 **Environment and Climate Change Canada.** This department is responsible for

- providing leadership and overseeing adaptation efforts across the federal government, including for the National Adaptation Strategy
- coordinating interdepartmental governance to support alignment and coherence across federal adaptation programming
- coordinating the monitoring and reporting of federal adaptation programming and the National Adaptation Strategy's implementation more broadly
- acting as the federal adaptation “single window” of coherence to provide collaboration and alignment with other interested parties including First Nations, Inuit, Métis, provinces, and territories

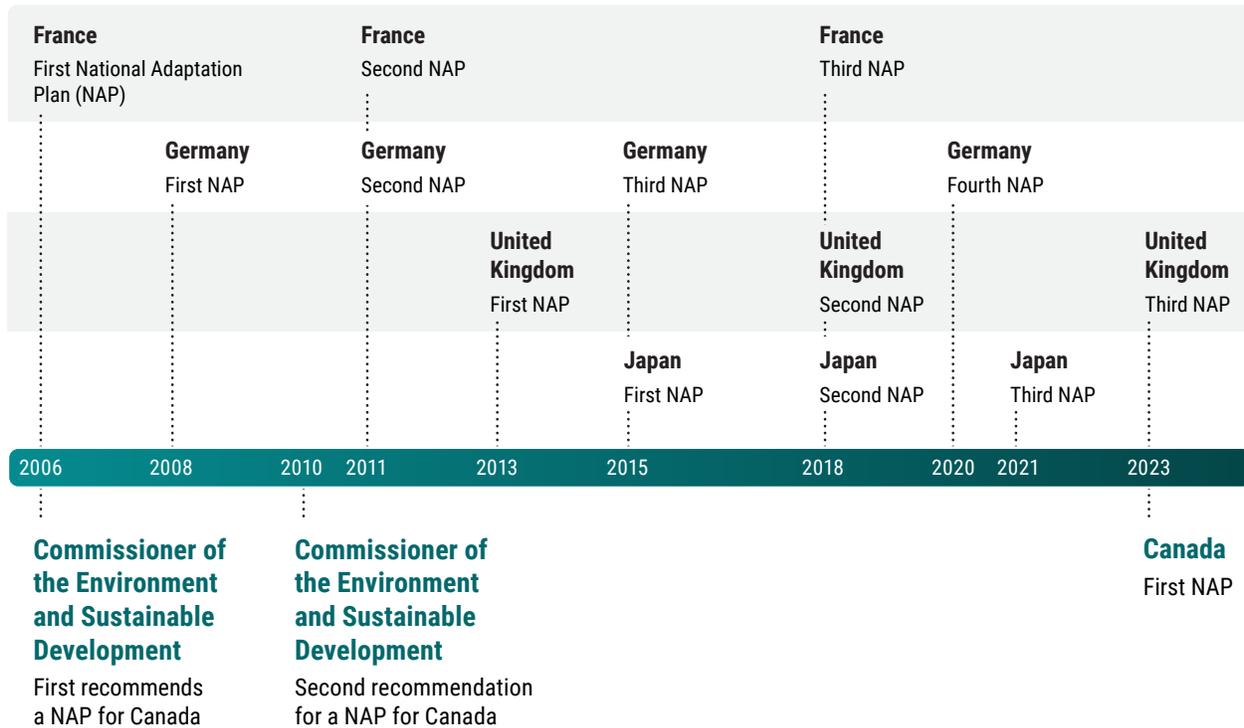
1.9 **Environment and Climate Change Canada and other leading departments: Health Canada; Housing, Infrastructure and Communities Canada; Natural Resources Canada; and Public Safety Canada.** These departments are responsible for

- the overall policy leadership and support for program integration and coherence across the suite of federal programs falling under their system of the National Adaptation Strategy
- the support for Environment and Climate Change Canada's reporting on system-level progress and outcomes

Previous audits

1.10 Notwithstanding the fact that the first National Adaptation Strategy was only recently published, federal organizations have been developing and implementing programs to adapt to climate change for decades. In 2006, the Commissioner of the Environment and Sustainable Development first recommended the development of a federal adaptation strategy to help align and coordinate these programs and initiatives. Following the 2006 audit, reports in 2010, 2017, and 2018 found that insufficient actions had been taken to adapt to the effects of a changing climate, and still no federal strategy or action plan had been developed. Despite our audit findings and recommendations and the requirements of the Paris Agreement, Canada was one of the last of 38 Organisation for Economic Co-operation and Development member countries to publish a national adaptation strategy. (See [Exhibit 1.3](#) for a sample of the member countries and when they published a national adaptation plan.) Furthermore, over half the countries had already updated their adaptation plans at least once.

Exhibit 1.3—Canada was one of the last Organisation for Economic Co-operation and Development countries to develop a national adaptation strategy



Note: A sample of 5 of the 38 Organisation for Economic Co-operation and Development countries are represented in this exhibit.

[Read the Exhibit 1.3 text description](#)

Focus of the audit

1.11 This audit focused on whether Environment and Climate Change Canada and other leading departments had effectively designed the National Adaptation Strategy. This audit also examined early implementation of 7 key programs from the federal action plan that play key roles in advancing the Government of Canada's contribution to the National Adaptation Strategy. This examination was specific to the early implementation of the strategy and did not include an overall program performance review for any of the 7 key programs.

1.12 This audit is important because Canada's climate is changing rapidly, and Canadians are experiencing widespread impacts such as more frequent and devastating events like heat waves, floods, droughts, and wildfires. The growing magnitude and scale of these impacts come with significant costs that are expected to increase rapidly over time, particularly if adaptation actions are not timely. This audit will also contribute to international efforts such as the Global Cooperative Audit of Climate Change Adaptation Actions and the ClimateScanner initiative.

1.13 More details about the audit objective, scope, approach, and criteria are in [About the Audit](#) at the end of this report.

Findings and Recommendations

National Adaptation Strategy's key elements missing or incomplete

Why this finding matters

1.14 The financial and human costs of climate change and extreme weather events are increasing at a rapid pace and in some cases cause irreversible damages, making it important for the Government of Canada to lead by example and have a clear understanding of the risks and priorities for action. The Government of Canada estimates that since 2015 it has invested over \$6.6 billion toward adaptation-related efforts, including over \$1.6 billion in federal funding commitments to implement the National Adaptation Strategy.

1.15 The successful implementation of Canada's National Adaptation Strategy depends on strong leadership and effective actions. Given that climate change has no borders, the strategy requires collaboration and coordination of adaptation actions across the whole of society, while respecting the jurisdiction and responsibilities of different levels of government and upholding Indigenous rights.

1.16 The strategy includes the first iteration of a monitoring and evaluation framework that aims to track Canada's adaptation progress, ensure transparency on the state of climate change preparedness, enable informed decision making, and take the most effective actions to protect Canadians from the effects of climate change.

Context

1.17 The United Nations Framework Convention on Climate Change and the Paris Agreement provided expectations for the design of a national adaptation strategy. These guidelines include the need for iteratively assessing climate change risks and vulnerabilities and formulating nationally determined prioritized actions to address these risks while considering the needs of disproportionately affected populations. These guidelines also provided expectations for the implementation, monitoring, and evaluation of a national adaptation strategy, including the need for measuring and reporting for ongoing improvement, and for the effectiveness and efficiency of adaptation measures.

1.18 The National Adaptation Strategy was designed around 3 implementation components that were intended to be complementary and drive whole-of-society action and collaboration to meet its objectives and targets. The 3 implementation components were initially expected to be in place by the end of 2024:

- the Government of Canada Adaptation Action Plan
- the Indigenous Climate Leadership Agenda
- the Federal, Provincial and Territorial Bilateral Action Plans

Missing implementation components

Findings

1.19 We found that Environment and Climate Change Canada, working with key partners, had not yet established 2 of the 3 implementation components ([Exhibit 1.4](#)). The Indigenous Climate Leadership Agenda and the Federal, Provincial and Territorial Bilateral Action Plans remain works in progress. Furthermore, the only component in place, the Government of Canada Adaptation Action Plan and its 73 actions, had gaps.

Exhibit 1.4—Two of the 3 components to implement the National Adaptation Strategy had not been established as of 1 December 2024

National Adaptation Strategy component	Details	Status
Government of Canada Adaptation Action Plan	Intended to be the centrepiece of the National Adaptation Strategy. Includes 73 federal actions in various programs and initiatives to be implemented across 22 departments and agencies	Established
Indigenous Climate Leadership Agenda	Intended to be the main pathway to support self-determined action to address Indigenous peoples' climate priorities, including adaptation	Not established
Federal, Provincial and Territorial Bilateral Action Plans	<ul style="list-style-type: none"> • Establish Federal, Provincial and Territorial Bilateral Action Plans • Ensure continued federal engagement with provinces and territories • Create an inventory of adaptation actions 	Not established

1.20 Although Environment and Climate Change Canada was engaging key partners on the Indigenous Climate Leadership Agenda, we found that it had not been launched as of 1 December 2024. Additionally, although First Nations, Inuit, and Métis organizations had each released

national climate strategies, we found that Environment and Climate Change Canada had not formally assessed the coherence between federal programming and Indigenous-led strategies.

1.21 Similarly, we found that Environment and Climate Change Canada had not established Federal, Provincial and Territorial Bilateral Action Plans and had pushed the timelines for completion to 2026. We also found that the department had engaged with each province and territory and made progress in establishing mechanisms for collaboration with some of them. In our view, if bilateral action plans with all provinces and territories are not established, other measures need to be explored to progress toward a whole-of-society National Adaptation Strategy.

1.22 We found that Environment and Climate Change Canada acknowledged the importance of understanding the current state of federal, provincial, and territorial actions by initiating an analysis to inform the development of the Federal, Provincial and Territorial Bilateral Action Plans. However, we found that the analysis was incomplete. For example, it did not include a review of all provincial and territorial actions and how they align with the objectives of the National Adaptation Strategy, and it was not used to inform federal decisions, leading to risks of duplication and omissions.

1.23 We found that Environment and Climate Change Canada, as the lead for the National Adaptation Strategy, outlined initial high-level roles and responsibilities for other leading departments. However, we found that the accountability between Environment and Climate Change Canada and other leading departments for multiple aspects of the strategy was unclear. In addition, we found that the department delegated responsibilities to other leading departments without formally documenting them and obtaining agreement. Demonstrating leadership by articulating clear roles and responsibilities and providing guidance would improve the alignment of existing work, enable more efficient decision making, and avoid duplication.

Recommendation

1.24 In order to foster a whole-of-society implementation of the National Adaptation Strategy and demonstrate leadership, especially in the current absence of the Indigenous Climate Leadership Agenda and Federal, Provincial and Territorial Bilateral Action Plans, Environment

and Climate Change Canada, working with Health Canada; Housing, Infrastructure and Communities Canada; Natural Resources Canada; and Public Safety Canada, should

- formalize roles and responsibilities for leading departments and improve interdepartmental collaboration, governance, and communication
- develop a work plan with clear deliverables related to assessing the state of current actions and to support the establishment of bilateral action plans with provinces and territories and of collaboration goals and expectations in the absence of action plans in place
- identify mechanisms to seek and incorporate Indigenous Knowledge and perspectives as part of all 3 of the components of the National Adaptation Strategy

Environment and Climate Change Canada's response. Agreed.

See [Recommendations and Responses](#) at the end of this report for detailed responses.

Canada's climate change risks were not prioritized

Findings

1.25 We found Environment and Climate Change Canada, working with other leading departments, did not use a risk-based approach to prioritize the selection of the National Adaptation Strategy's systems, objectives, and targets. Rather, the departments relied largely on existing government priorities and consultations to identify these key elements. We also found that although some climate change risks were identified during the consultation process for the strategy, they were not addressed in the final targets. For example, we found that the Health and Well-Being system lacked several targets and dedicated actions related to important and increasingly prevalent health risks for Canadians ([Exhibit 1.5](#)). In addition, Environment and Climate Change Canada told us that it will not add any new targets until 2030. Without any dedicated targets to address these risks within the National Adaptation Strategy, the federal government had failed to highlight the need for immediate whole-of-society action to address them.

Exhibit 1.5—The National Adaptation Strategy was missing some targets and dedicated actions to address health risks from climate change

We found that the Health and Well-Being system of the National Adaptation Strategy was missing targets on key health risks such as Lyme disease and the mental health impacts of climate change. This is important because warming temperatures are increasing the risk of Lyme disease. In Canada, the number of reported human cases of the disease rose from 144 in 2009 to 2,525 in 2022, representing an increase of over 1,500%.

In addition, climate change is impacting the mental health of many groups and individuals. For example, addressing the mental health impacts of climate change was a key priority for many Indigenous peoples in Canada. Furthermore, they were disproportionately affected because they were at a greater risk of being displaced by climate-related hazards, which could result in a loss of community connections and loss of traditional livelihoods. Indigenous peoples could also experience ecological grief from loss of land, ecosystems and species, and cultural identity associated with both past and future climate change impacts.

We also found that the strategy was missing dedicated actions to address the health impacts of wildfire smoke. This is problematic because in Canada the area burned by wildfires had increased over time, which had impacts for the health and well-being of Canadians. Between 2013 and 2018, the estimated annual costs were between \$410 million and \$1.8 billion for short-term health effects. Health Canada estimated that for the same time frame, up to 240 Canadians died every year because of short-term exposure to wildfire air pollution.



2023 British Columbia fire

Photo: Grant Faint/Gettyimages.ca

1.26 We found that Environment and Climate Change Canada did not address several gaps identified in the 2019 national climate change risk assessment, which informed the strategy. The assessment pointed to existing knowledge gaps and challenges that, together with limited resources, constrained the ability to conduct a national risk prioritization exercise reflective of the geography of Canada, the diversity of the population, and the values of people in Canada. For example, we found

that the risk assessment did not fully incorporate Indigenous Knowledge and did not thoroughly examine specific risks faced by Indigenous communities. Furthermore, the assessment recommended that structured, well-resourced, inclusive, and regularly updated national (and regional) climate change risk assessments in Canada could enhance their transparency, legitimacy, and authority going forward. We found that although Environment and Climate Change Canada did consult with Indigenous partners during the development of the strategy, it did not undertake additional work to improve the risk assessment, and those gaps remain.

1.27 Environment and Climate Change Canada had not developed a process to keep climate change risks up to date and integrate them into future updates of the strategy. Timely updating of risk assessments is important to take into account emerging shifts in climate change vulnerabilities, lessons learned, and new science.

Recommendation

1.28 In order to inform future updates of the National Adaptation Strategy, Environment and Climate Change Canada, working with Health Canada; Housing, Infrastructure and Communities Canada; Natural Resources Canada; and Public Safety Canada, should

- conduct a gap analysis to comprehensively identify and prioritize deficiencies related to Canada’s greatest climate change risks, including consideration of the strategy’s guiding principles and disproportionately affected populations
- develop a process to keep up-to-date climate change risks and integrate them into the strategy; the process would include assessing the scale of potential impact, likelihood of risk being realized, and feasibility and net benefits of adaptation response for each risk

Environment and Climate Change Canada’s response. Agreed.

See [Recommendations and Responses](#) at the end of this report for detailed responses.

No economic analysis of required adaptation funding and resource allocation

Findings

1.29 We found that Environment and Climate Change Canada did not know how much of the Government of Canada’s funding is associated with the 73 federal actions in the Government of Canada Adaptation Action Plan. We also found that the economic analysis used for senior-level discussions on the relative sufficiency and distribution of adaptation funding lacked necessary detail for informed resource

allocation and decision making. For example, the analysis did not clarify trade-offs or risks such as the costs of inaction to inform future decision making. The costs of inaction are the costs incurred by continuing with a business-as-usual approach while facing the climate crisis.

1.30 We found that **value for money**² was considered as part of spending decisions in only 3 of 7 programs we examined. As a result, it will be difficult for Environment and Climate Change Canada and for Canadians to understand how the spending was contributing to the expected results. Some other countries use value-for-money assessments to maximize the effectiveness of investment in climate change adaptation and resilience. For example, when developing its fourth national adaptation plan, the government of the United Kingdom was using such a tool to inform adaptation efforts.

1.31 Environment and Climate Change Canada acknowledged that more than the current scope and scale of investment were needed to meet pressing climate change adaptation needs, particularly with regard to the Nature and Biodiversity system of the National Adaptation Strategy. We found that despite Canada's commitment through the Kunming-Montreal Global Biodiversity Framework in 2022 and in previous biodiversity agreements, there was no prioritization analysis undertaken across the 5 systems of the strategy, no direct federal adaptation programming, and zero dollars invested under the Nature and Biodiversity system as part of the National Adaptation Strategy. This was a gap in the federal action plan because nature-based approaches to adaptation are cost-effective and offer a suite of other benefits to protect vulnerable ecosystems and help maintain biodiversity.

Recommendation

1.32 In order for the National Adaptation Strategy to address Canada's most pressing climate change adaptation needs and make informed decisions at the federal level, Environment and Climate Change Canada, working with Health Canada; Housing, Infrastructure and Communities Canada; Natural Resources Canada; and Public Safety Canada, should undertake a comprehensive economic analysis of federal adaptation actions—including, for example:

- funding prioritization for the 5 systems of the National Adaptation Strategy
- implementation status and results
- value for money of adaptation actions including unquantifiable costs and benefits such as equity considerations, costs of inaction, and uncertainties associated with future climate change scenarios, and identify opportunities to leverage actions of other levels of government and partners

² **Value for money**—In relation to public spending, the consideration of economy (minimizing cost), efficiency (maximizing output), effectiveness (fully attaining the intended results), and a fair distribution of benefits.

Environment and Climate Change Canada’s response. Agreed.

See [Recommendations and Responses](#) at the end of this report for detailed responses.

Federal action plan was incomplete and inconsistent

Findings

1.33 We found that the list of 73 federal actions identified in the Government of Canada Adaptation Action Plan were a mix of new and existing federal programming instead of a systematic and comprehensive plan to help Canadians adapt to climate change. We found that Environment and Climate Change Canada did not provide clear guidance to other leading departments, did not include all ongoing federal actions, and did not design the action plan to ensure disproportionately affected populations received proportional benefits.

1.34 We found that Environment and Climate Change Canada relied on the other leading departments to propose federal actions but did not provide clear guidance or formal definitions of the types of adaptation programming to be included (for example, direct, indirect, or other types of actions). We found that this led to actions that were missing from the plan. For example, the Climate Change Adaptation Platform Plenary, which is co-led by Natural Resources Canada and Environment and Climate Change Canada, was not included as a stand-alone action in the plan despite being directly linked to the strategy’s objective related to cross-jurisdictional cooperation and knowledge sharing. Further, the lack of guidance led to inconsistency in the programming that was included for the plan. For example, Environment and Climate Change Canada opted to include actions indirectly contributing to adaptation while 2 other leading departments did not.

1.35 In March 2024, Environment and Climate Change Canada conducted an analysis of the Nature and Biodiversity system and the foundational elements to identify gaps and to ensure that the actions included will meet the objectives of the National Adaptation Strategy. This analysis included an assessment of coherence between federal actions and provincial and territorial adaptation efforts. However, it did not include Indigenous-led and local actions to ensure coherence across other sectors of the whole-of-society strategy. As of 1 December 2024, we found that the department had not leveraged this analysis to improve its own actions or shared the methodology to foster improvement across all systems.

1.36 We found that Environment and Climate Change Canada did not ask other leading departments to prioritize actions to ensure that disproportionately affected populations received proportional benefits and did not know whether all 73 actions collected data to produce

gender-based analysis plus related to the National Adaptation Strategy. We also found that the department did not assess the anticipated equity outcomes of these actions. Further, the department did not know the total number of actions that had programming that was aligned with the guiding principles of the strategy, which included equity and climate and environmental justice ([Exhibit 1.2](#)). Understanding these gaps is necessary to ensure that the guiding principles are applied and used to inform how actions are designed and advanced under the strategy.

Recommendation

1.37 Environment and Climate Change Canada should work collaboratively with Health Canada; Housing, Infrastructure and Communities Canada; Natural Resources Canada; and Public Safety Canada to provide guidance on

- defining which direct, indirect, or other types of adaptation actions to include and prioritize within the Government of Canada Adaptation Action Plan
- applying the National Adaptation Strategy’s 4 guiding principles for all federal actions

Environment and Climate Change Canada’s response. Agreed.

See [Recommendations and Responses](#) at the end of this report for detailed responses.

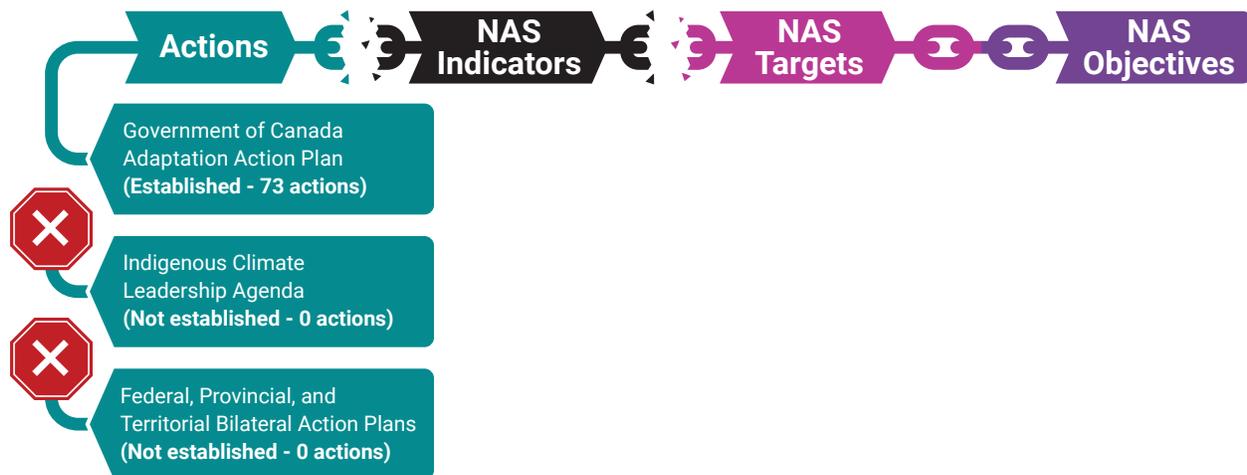
Framework for monitoring and evaluation was not designed to measure progress

Findings

1.38 We found that Environment and Climate Change Canada, working with other leading departments, had not developed an effective whole-of-society measuring system to track progress toward the objectives of the National Adaptation Strategy. For example, we found the initial monitoring and evaluation framework did not track progress and that actions, indicators, and objectives were not connected. We also found that the department did not have mechanisms in place for iterative updates and continuous improvement of the monitoring and evaluation framework.

1.39 The strategy’s monitoring and evaluation framework listed 13 indicators intended to track progress in implementation. However, we found that Environment and Climate Change Canada failed to connect those indicators to the strategy’s 32 objectives and had also not connected the 73 federal actions to the indicators ([Exhibit 1.6](#)). In addition, we found that the department did not connect those indicators to the strategy’s 25 targets.

Exhibit 1.6—The National Adaptation Strategy's (NAS) actions, indicators, targets, and objectives were not connected and not able to measure whole-of-society adaptation progress



[Read the Exhibit 1.6 text description](#)

1.40 Achieving the strategy's objectives requires whole-of-society action and coordination among all levels of governments. However, we found that Environment and Climate Change Canada had not identified what actions from other levels of governments were taking place or highlighted potential gaps to meet the targets. Alignment and coordination of efforts are vital for the National Adaptation Strategy to be successful. Without a full understanding of actions from other partners such as provinces, territories, and Indigenous peoples as well as an improved monitoring and evaluation framework, it will be difficult for Environment and Climate Change Canada to determine whether there are any gaps in programming and whether the actions and indicators of the strategy are sufficient to measure progress against the objectives.

1.41 The strategy includes 32 objectives and 25 targets. However, we found that 12 objectives did not have any targets. In addition, we found that not all 25 targets were SMART (Specific, Measurable, Achievable, Relevant, and Time-bound). We found that although all 25 targets were relevant and mostly time-bound, some lacked specificity and were not achievable. Furthermore, in some instances, the targets were not measurable. For example:

- Target: "By 2030, all northern and Indigenous communities have resources to develop, or have access to, culturally appropriate tools and information to address climate risks." Many aspects of this target were not specific. In addition, the target was not measurable as it lacked indicator(s) and was unclear as to what would be measured and reported.
- Target: "By 2027, 70% of the members of relevant professional associations (e.g., civil engineers, planners, landscape architects,

accountants, and others) have the capacity to apply climate change adaptation tools and information and communicate the business case for adaptation measures to their clients or target audiences.” This target was not clear or specific. This ambitious target was not achievable unless there was concerted and collaborative national and regional effort.

1.42 Environment and Climate Change Canada did not expect more than half of the strategy targets to be achieved until 2028 or later. A better practice would have been for Environment and Climate Change Canada, working with the other leading departments, to establish interim targets to guide implementation and corrective action. We found that only 2 of these 13 indicators had interim targets, meaning that the departments will not know whether the initiatives are on track in a timely manner. Interim targets are necessary for Canadians and decision makers to understand whether actions are successful and progress is taking place.

Limited early implementation and reporting on the National Adaptation Strategy

Why this finding matters

1.43 The Government of Canada, and Environment and Climate Change Canada in particular, play a key leadership role in helping to ensure adaptation actions across the country are coordinated, effective, and efficient. At a federal level, this includes convening departments and organizations to align collective efforts, making adaptation mainstream in everyday operations and decision making, and providing a sound scientific foundation to support action.

Findings

1.44 Although there are 73 actions, which include programs and initiatives, in the Government of Canada Adaptation Action Plan, Environment and Climate Change Canada must report annually on only 17 key federal programs that are part of a horizontal initiative. For the remaining federal actions, the department was relying on other federal departmental reporting mechanisms. However, we found that Environment and Climate Change Canada had not identified where all actions were reported and whether there were any gaps. In addition, we found that it had not connected the 17 key federal programs to the National Adaptation Strategy’s objectives, targets, and indicators. Without a connected whole-of-society reporting framework, Canadians and decision makers will not be able to identify what is working and where more targeted efforts are needed toward a more resilient Canada.

1.45 We examined whether 7 of these key programs had implemented early actions specific to the National Adaptation Strategy. We found that these programs had completed some work to align with the strategy. However, we found limited early implementation of the National Adaptation Strategy ([Exhibit 1.7](#)), despite the departments having spent the majority of the funding budgeted for the first year. Specifically, 6 of the 7 programs reviewed spent a total of \$41 million, which represented 79% of the budgeted strategy funds. One of the programs reviewed was unable to disaggregate the spent amount of strategy funding from other sources of funding.

1.46 We found that some programs had delays in implementation. Reasons for the delays included administrative challenges (for example, calls for project proposals and contribution agreement signatures), the need to establish baseline data, and a lack of measuring due to long-term targets (that is, progress to be measured 4 years or more later). However, regardless of whether the results are positive or negative, without a clear connection of the program indicators to the strategy it is not possible to accurately reflect the strategy implementation status and help inform decision makers going forward. For example, some leading departments provided recent achievements such as lists of projects with collaborators and for funded research. We found, however, that these achievements were not connected to the indicators of the National Adaptation Strategy. In our view, this is a missed opportunity to capture meaningful adaptation results for Canadians.

Exhibit 1.7—Key reviewed programs implemented limited early actions contributing toward the National Adaptation Strategy

National Adaptation Strategy allocated funding and key program description	Leading department	System*	Early actions contributing toward the National Adaptation Strategy
<p>Disaster Mitigation and Adaptation Fund</p> <p>\$489.1 million to invest in structural and natural infrastructure projects to increase the resilience of communities that are impacted by natural disasters triggered by climate change</p>	Housing, Infrastructure and Communities Canada	Infrastructure	 Early actions taken
<p>Climate Toolkit for Housing and Infrastructure</p> <p>\$94.7 million to develop a new climate toolkit and increase data and knowledge; promote the use of standardized approaches to low carbon, climate-resilient infrastructure; and help shape capital investment decisions</p>	Housing, Infrastructure and Communities Canada	Infrastructure	 Early actions taken

National Adaptation Strategy allocated funding and key program description	Leading department	System*	Early actions contributing toward the National Adaptation Strategy
<p>Wildfire Resilient Futures Initiative</p> <p>\$285.0 million to invest in long-term climate resilience through community prevention and mitigation, innovation in fire knowledge and research, and establishing a Centre of Excellence</p>	Natural Resources Canada	Disaster resilience	 Limited early actions taken
<p>Flood Hazard Identification and Mapping Program</p> <p>\$164.2 million to advance work to complete flood hazard maps and regional models of targeted higher risk areas in Canada</p>	Natural Resources Canada (lead) with support from Environment and Climate Change Canada and Public Safety Canada	Disaster resilience	 Minimal early actions taken
<p>Climate-Resilient Coastal Communities Program</p> <p>\$41.4 million to increase the resilience of communities along Canada's coasts by applying a new, systems-based approach to integrated, regional-scale projects</p>	Natural Resources Canada	Economy and workers	 Limited early actions taken
<p>Protecting the Health of Canadians from Extreme Heat Program</p> <p>\$29.9 million to increase Canada's ability and capacity to adapt and reduce health impacts from extreme heat, including by supporting the implementation of Heat Alert and Response Systems</p>	Health Canada	Health and well-being	 Limited early actions taken
<p>Building Climate-Resilient and Low-Carbon Health Systems</p> <p>\$13.0 million to provide evidence, technical guidance, tools and support to health authorities and health systems across Canada to identify the climate risks they face and take actions to protect the health of their communities</p>	Health Canada	Health and well-being	 Limited early actions taken

Note: Our examination was specific to the early implementation of the National Adaptation Strategy and did not include an overall performance review of any of the 7 key programs (see the Scope and approach section in [About the Audit](#)).

* The Nature and Biodiversity system did not have any key programs.



Take urgent action to combat climate change and its impacts

Source: United Nations

1.47 We found that the National Adaptation Strategy was not well reflected in the Canadian Indicator Framework supporting the Sustainable Development Goals or in the 2022–2026 Federal Sustainable Development Strategy. For example, Environment and Climate Change Canada had aligned the National Adaptation Strategy with Goal 13 only, whereas many more goals are important in making progress toward the Sustainable Development Goals. Similarly, less than half of the 13 indicators in the National Adaptation Strategy supported the 2022–2026 Federal Sustainable Development Strategy and despite a commitment to do so, the department had not updated the online version to incorporate new or renewed targets reflecting the National Adaptation Strategy. In order to demonstrate the true contribution of adaptation actions beyond climate change, the National Adaptation Strategy should be better reflected in sustainable development measurement and reporting systems.

1.48 In the National Adaptation Strategy, Environment and Climate Change Canada committed to refining and sharing the monitoring and evaluation framework on an ongoing basis through a dedicated monitoring and evaluation web page. However, we found that the first public update for the monitoring and evaluation framework was not expected until summer 2025, 2 years after the strategy was released, and the department had not finalized the work plan for the publication of an updated framework.

1.49 We found that Environment and Climate Change Canada, working with other leading departments, had not developed a whole-of-society progress reporting structure that provides complete, reliable, clear, and timely information. We found gaps such as the following:

- **Incomplete**—No comprehensive whole-of-society reporting mechanism. In addition, Environment and Climate Change Canada did not plan to report on all the 73 federal actions.
- **Not reliable**—No mechanisms in place to validate the data provided by other leading departments.
- **Unclear**—No finalized progress reporting structure in place to coordinate and compile whole-of-society results.
- **Not timely**—No available information to course correct on a timely basis because Environment and Climate Change Canada intends to have only 1 progress report before the release of the next National Adaptation Strategy planned for 2030.

Recommendation

1.50 Environment and Climate Change Canada, working with Health Canada; Housing, Infrastructure and Communities Canada; Natural Resources Canada; and Public Safety Canada, should improve the National Adaptation Strategy framework for whole-of-society measuring and monitoring by

- ensuring that all future targets are SMART (Specific, Measurable, Achievable, Relevant, and Time-bound) and that all relevant Sustainable Development Goals are linked to targets
- developing interim targets or an approach to course correct to ensure that actions to reach the targets are on the right path and to measure progress before their end dates
- linking all adaptation actions to the targets and indicators
- developing a system to collect and monitor data to assess progress toward objectives and targets and developing mechanisms to course correct

Environment and Climate Change Canada’s response. Agreed.

See [Recommendations and Responses](#) at the end of this report for detailed responses.

Findings

1.51 Environment and Climate Change Canada did not plan to report progress on the National Adaptation Strategy until 2026, 3 years after its release. We found this timeline unreasonable when compared with other national adaptation reporting such as in the United Kingdom or New Zealand, which both reported every 2 years. We also found that Environment and Climate Change Canada had not aligned the reporting timelines with international reporting timeline requirements on adaptation (for example, the Biennial Transparency Report due every 2 years) to ensure increased coherence, efficiency, and effectiveness. More frequent reporting periods would generate more opportunities for learning and would provide optimal transparency on the state of climate change preparedness and on the effectiveness and efficiency of adaptation measures in Canada.

Recommendation

1.52 In the spirit of course correction and in consideration of the United Nations Framework Convention on Climate Change guidelines and the Paris Agreement, Environment and Climate Change Canada, working with Health Canada; Housing, Infrastructure and Communities Canada; Natural Resources Canada; and Public Safety Canada, should

comprehensively report more than once between the date of the release of the National Adaptation Strategy in 2023 and the next iteration in 2030.

Environment and Climate Change Canada’s response. Agreed.

See [Recommendations and Responses](#) at the end of this report for detailed responses.

Conclusion

1.53 We concluded that Environment and Climate Change Canada and other leading departments did not effectively design the National Adaptation Strategy and had implemented limited early actions to demonstrate progress.

1.54 The National Adaptation Strategy was missing essential elements including a prioritization of Canada’s climate change risks, an economic analysis to assign appropriate resources, a comprehensive federal action plan, and a framework for measuring and monitoring results. The implementation of key actions and the establishment of 2 of 3 components of the national strategy, namely the Federal, Provincial and Territorial Bilateral Action Plans and the Indigenous Climate Leadership Agenda, remain works in progress.

Subsequent Events

1.55 Subsequent to the end of our audit period on 1 December 2024, we noted that Environment and Climate Change Canada, working with partners, had conducted work related to 2 report findings. Specifically, in January 2025, the department

- shared its analysis of the Nature and Biodiversity system with the other leading departments and suggested they consider a similar methodology (see paragraph 1.35)
- finalized a work plan for the publication of an updated framework and progress reporting structure (see paragraphs 1.48 and 1.49)

About the Audit

This independent assurance report was prepared by the Office of the Auditor General of Canada on the National Adaptation Strategy. Our responsibility was to provide objective information, advice, and assurance to assist Parliament in its scrutiny of the government's management of resources and programs and to conclude on whether the National Adaptation Strategy complied in all significant respects with the applicable criteria.

All work in this audit was performed to a reasonable level of assurance in accordance with the Canadian Standard on Assurance Engagements (CSAE) 3001—Direct Engagements, set out by the Chartered Professional Accountants of Canada (CPA Canada) in the CPA Canada Handbook—Assurance.

The Office of the Auditor General of Canada applies the Canadian Standard on Quality Management 1—Quality Management for Firms That Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements. This standard requires our office to design, implement, and operate a system of quality management, including policies or procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

In conducting the audit work, we complied with the independence and other ethical requirements of the relevant rules of professional conduct applicable to the practice of public accounting in Canada, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behaviour.

In accordance with our regular audit process, we obtained the following from entity management:

- confirmation of management's responsibility for the subject under audit
- acknowledgement of the suitability of the criteria used in the audit
- confirmation that all known information that has been requested, or that could affect the findings or audit conclusion, has been provided
- confirmation that the audit report is factually accurate

Audit objective

The objective of this audit was to determine whether Environment and Climate Change Canada and other system leads, have effectively designed the National Adaptation Strategy and implemented actions.

Scope and approach

The federal organizations audited were Environment and Climate Change Canada; Health Canada; Housing, Infrastructure and Communities Canada; Natural Resources Canada; and Public Safety Canada.

The first line of enquiry examined whether Environment and Climate Change Canada had effectively designed the National Adaptation Strategy to achieve the strategy's principles, objectives, and targets. This included whether Environment and Climate Change Canada, working with the other federal leading departments and other key partners, had

- a comprehensive assessment and prioritization of Canada's climate change risks
- effective governance structures and demonstrated leadership
- a framework for measuring, monitoring, and timely reporting of progress to support whole-of-society implementation of the strategy

The second line of enquiry of the audit focused on whether 7 key programs had made early progress specific to implementing National Adaptation Strategy actions. As this audit focused on the strategy, this line of enquiry did not include an overall program performance for any of the programs reviewed.

We chose these 7 key programs for our detailed examination because they were led exclusively by the leading departments and played a key role in advancing the Government of Canada's contribution to the strategy. These programs accounted for \$1.12 billion of over \$1.6 billion in recent adaptation funding. Our examination of these programs was based on the following:

- results to date against indicators associated with annual reporting requirements
- value for money as it relates to adaptation
- tracking and disaggregation of results related to the strategy's funding
- whether projects were approved in consideration of the strategy

We also examined whether the reviewed programs were aligned with the strategy. This included an examination of specific criteria such as

- alignment of indicators to the strategy and in key program documentation
- alignment to the strategy's guiding principles, which includes gender-based analysis plus (GBA Plus)
- alignment to the United Nations' Sustainable Development Goals
- whether key program documentation such as project criteria had been adjusted to align to the National Adaptation Strategy

The audit approach included interviews with organization officials and partners. The audit team also analyzed design processes, documents, data, and other information sources.

Criteria

We used the following criteria to conclude against our audit objective:

Criteria	Sources
<p>Environment and Climate Change Canada has designed a whole-of-society strategy, including a mechanism for continuous improvement, on the basis of the guiding principles and a comprehensive assessment and prioritization of Canada's climate change risks.</p>	<ul style="list-style-type: none"> • Canada's National Adaptation Strategy: Building Resilient Communities and a Strong Economy, Environment and Climate Change Canada, 2023 • Government of Canada Adaptation Action Plan, Environment and Climate Change Canada, 2023 • A Healthy Environment and a Healthy Economy: Canada's Strengthened Climate Plan to Create Jobs and Support People, Communities and the Planet, Environment and Climate Change Canada, 2020 • Minister of Environment and Climate Change Mandate Letter, 2021 • Minister of Environment and Climate Change Supplementary Mandate Letter, 2021 • Minister of Infrastructure and Communities Supplementary Mandate Letter, 2021 • Minister of Health Supplementary Mandate Letter, 2021 • Minister of Public Safety and Emergency Preparedness Supplementary Mandate Letter, 2021 • Minister of Natural Resources Supplementary Mandate Letter, 2021 • Performance Audit ISSAI Implementation Handbook, International Organization of Supreme Audit Institutions (INTOSAI) Development Initiative, 2021 • Paris Agreement, United Nations Framework Convention on Climate Change, 2015 • 2022–2026 Federal Sustainable Development Strategy, Environment and Climate Change Canada • Policy on Results, Treasury Board, 2016 • Directive on Results, Treasury Board, 2016 • Framework for the Management of Risk, Treasury Board of Canada Secretariat, 2010 • Recommendation of the Council on Policy Coherence for Sustainable Development, Organisation for Economic Co-operation and Development, 2019

Criteria	Sources
<p>Environment and Climate Change Canada and other National Adaptation Strategy system leads have effective governance structures and have provided leadership to support whole-of-society implementation of the strategy including the implementation of the strategy's guiding principles.</p>	<ul style="list-style-type: none"> • Canada's National Adaptation Strategy: Building Resilient Communities and a Strong Economy, Environment and Climate Change Canada, 2023 • Government of Canada Adaptation Action Plan, Environment and Climate Change Canada, 2023 • A Healthy Environment and a Healthy Economy: Canada's Strengthened Climate Plan to Create Jobs and Support People, Communities and the Planet, Environment and Climate Change Canada, 2020 • Minister of Environment and Climate Change Mandate Letter, 2021 • Minister of Environment and Climate Change Supplementary Mandate Letter, 2021 • Minister of Infrastructure and Communities Supplementary Mandate Letter, 2021 • Minister of Health Supplementary Mandate Letter, 2021 • Minister of Public Safety and Emergency Preparedness Supplementary Mandate Letter, 2021 • Minister of Natural Resources Supplementary Mandate Letter, 2021 • Performance Audit ISSAI Implementation Handbook, International Organization of Supreme Audit Institutions (INTOSAI) Development Initiative, 2021 • Paris Agreement, United Nations Framework Convention on Climate Change, 2015 • Framework for the Management of Risk, Treasury Board of Canada Secretariat, 2010 • Policy on Results, Treasury Board, 2016 • Directive on Results, Treasury Board, 2016 • Guide to Departments on the Management and Reporting of Horizontal Initiatives, Treasury Board of Canada Secretariat, 2018 • Recommendation of the Council on Policy Coherence for Sustainable Development, Organisation for Economic Co-operation and Development, 2019

Criteria	Sources
<p>Environment and Climate Change Canada and other National Adaptation Strategy system leads have established a framework for the measuring, monitoring, and timely reporting of progress on the strategy's goals, objectives, and targets.</p>	<ul style="list-style-type: none"> • Canada's National Adaptation Strategy: Building Resilient Communities and a Strong Economy, Environment and Climate Change Canada, 2023 • Government of Canada Adaptation Action Plan, Environment and Climate Change Canada, 2023 • A Healthy Environment and a Healthy Economy: Canada's Strengthened Climate Plan to Create Jobs and Support People, Communities and the Planet, Environment and Climate Change Canada, 2020 • Minister of Environment and Climate Change Mandate Letter, 2021 • Minister of Environment and Climate Change Supplementary Mandate Letter, 2021 • Minister of Infrastructure and Communities Supplementary Mandate Letter, 2021 • Minister of Health Supplementary Mandate Letter, 2021 • Minister of Public Safety and Emergency Preparedness Supplementary Mandate Letter, 2021 • Minister of Natural Resources Supplementary Mandate Letter, 2021 • Performance Audit ISSAI Implementation Handbook, International Organization of Supreme Audit Institutions (INTOSAI) Development Initiative, 2021 • Policy on Results, Treasury Board, 2016 • Paris Agreement, United Nations Framework Convention on Climate Change, 2015 • Transforming Our World: The 2030 Agenda for Sustainable Development, United Nations, 2015 • 2022–2026 Federal Sustainable Development Strategy, Environment and Climate Change Canada • Framework for the Management of Risk, Treasury Board of Canada Secretariat, 2010 • Directive on Results, Treasury Board, 2016 • Guide to Departments on the Management and Reporting of Horizontal Initiatives, Treasury Board of Canada Secretariat, 2018

Criteria	Sources
<p>National Adaptation Strategy system leads have implemented early actions for their respective key National Adaptation Strategy programs and have ensured alignment with the strategy.</p>	<ul style="list-style-type: none"> • Canada’s National Adaptation Strategy: Building Resilient Communities and a Strong Economy, Environment and Climate Change Canada, 2023 • Government of Canada Adaptation Action Plan, Environment and Climate Change Canada, 2023 • A Healthy Environment and a Healthy Economy: Canada’s Strengthened Climate Plan to Create Jobs and Support People, Communities and the Planet, Environment and Climate Change Canada, 2020 • Minister of Environment and Climate Change Mandate Letter, 2021 • Minister of Environment and Climate Change Supplementary Mandate Letter, 2021 • Minister of Infrastructure and Communities Supplementary Mandate Letter, 2021 • Minister of Health Supplementary Mandate Letter, 2021 • Minister of Public Safety and Emergency Preparedness Supplementary Mandate Letter, 2021 • Minister of Natural Resources Supplementary Mandate Letter, 2021 • Performance Audit ISSAI Implementation Handbook, International Organization of Supreme Audit Institutions (INTOSAI) Development Initiative, 2021 • Paris Agreement, United Nations Framework Convention on Climate Change, 2015 • 2022–2026 Federal Sustainable Development Strategy, Environment and Climate Change Canada • Policy on Results, Treasury Board, 2016 • Directive on Results, Treasury Board, 2016 • Guide to Departments on the Management and Reporting of Horizontal Initiatives, Treasury Board of Canada Secretariat, 2018 • Framework for the Management of Risk, Treasury Board of Canada Secretariat, 2010 • Recommendation of the Council on Policy Coherence for Sustainable Development, Organisation for Economic Co-operation and Development, 2019

Period covered by the audit

The audit covered the period from 1 December 2020 to 1 December 2024. This is the period to which the audit conclusion applies.

Date of the report

We obtained sufficient and appropriate audit evidence on which to base our conclusion on 14 May 2025, in Ottawa, Canada.

Audit team

This audit was completed by a multidisciplinary team from across the Office of the Auditor General of Canada led by Kimberley Leach, Principal. The principal has overall responsibility for audit quality, including conducting the audit in accordance with professional standards, applicable legal and regulatory requirements, and the office's policies and system of quality management.

Recommendations and Responses

Responses appear as they were received by the Office of the Auditor General of Canada.

In the following table, the paragraph number preceding the recommendation indicates the location of the recommendation in the report.

Recommendation	Response
<p>1.24 In order to foster a whole-of-society implementation of the National Adaptation Strategy and demonstrate leadership, especially in the current absence of the Indigenous Climate Leadership Agenda and Federal, Provincial and Territorial Bilateral Action Plans, Environment and Climate Change Canada, working with Health Canada; Housing, Infrastructure and Communities Canada; Natural Resources Canada; and Public Safety Canada, should</p> <ul style="list-style-type: none"> • formalize roles and responsibilities for leading departments and improve interdepartmental collaboration, governance, and communication • develop a work plan with clear deliverables related to assessing the state of current actions and to support the establishment of bilateral action plans with provinces and territories and of collaboration goals and expectations in the absence of action plans in place • identify mechanisms to seek and incorporate Indigenous Knowledge and perspectives as part of all 3 of the components of the National Adaptation Strategy 	<p>Environment and Climate Change Canada’s response. Agreed. By January 31, 2026, Environment and Climate Change Canada (ECCC) will work with Health Canada (HC), Housing, Infrastructure and Communities Canada (HICC), Natural Resources Canada (NRCan), and Public Safety Canada (PS) to prepare additional documentation outlining the roles and responsibilities of implementing departments. This work will leverage federal adaptation governance allowing for interdepartmental collaboration.</p> <p>ECCC will balance the need for flexible approaches in working with different provinces and territories, given the state of current actions in each jurisdiction. By September 30, 2026, a workplan will be elaborated to identify federal collaboration goals and adaptation objectives, to be advanced with each Province and Territory depending on the level of readiness and local priorities, including in jurisdictions without an action plan.</p> <p>By January 31, 2026 ECCC will work with Indigenous partners and HC, HICC, NRCan, and PS to advance the consideration and inclusion of Indigenous Knowledge and perspectives through the National Adaptation Strategy mechanisms.</p>

Recommendation	Response
<p>1.28 In order to inform future updates of the National Adaptation Strategy, Environment and Climate Change Canada, working with Health Canada; Housing, Infrastructure and Communities Canada; Natural Resources Canada; and Public Safety Canada, should</p> <ul style="list-style-type: none"> • conduct a gap analysis to comprehensively identify and prioritize deficiencies related to Canada’s greatest climate change risks, including consideration of the strategy’s guiding principles and disproportionately affected populations • develop a process to keep up-to-date climate change risks and integrate them into the strategy; the process would include assessing the scale of potential impact, likelihood of risk being realized, and feasibility and net benefits of adaptation response for each risk <p>1.32 In order for the National Adaptation Strategy to address Canada’s most pressing climate change adaptation needs and make informed decisions at the federal level, Environment and Climate Change Canada, working with Health Canada; Housing, Infrastructure and Communities Canada; Natural Resources Canada; and Public Safety Canada, should undertake a comprehensive economic analysis of federal adaptation actions—including, for example:</p> <ul style="list-style-type: none"> • funding prioritization for the 5 systems of the National Adaptation Strategy • implementation status and results • value for money of adaptation actions including unquantifiable costs and benefits such as equity considerations, costs of inaction, and uncertainties associated with future climate change scenarios, and identify opportunities to leverage actions of other levels of government and partners 	<p>Environment and Climate Change Canada’s response. Agreed. ECCC will leverage the landscape of federal, provincial and territorial risk assessments to identify gaps in climate change risks. The analysis will be updated to consider the guiding principles, which include equity and inclusion considerations. Evergreen gap analysis will inform the development of an iterative national climate change risk assessment process. By January 2026, ECCC will develop a plan indicating resources required to have a first assessment in place as early as 2027 to support the next iteration of the national adaptation policy cycle—an update to the next adaptation strategy expected by 2030.</p> <p>Environment and Climate Change Canada’s response. Agreed. By May 31, 2026 ECCC will work with other implementing departments to develop a plan indicating resources required to conduct an analysis or assessment of federal adaptation actions, which will be useful, among other things, to support federal funding prioritization ahead of the next adaptation strategy expected by 2030.</p>

Recommendation	Response
<p>1.37 Environment and Climate Change Canada should work collaboratively with Health Canada; Housing, Infrastructure and Communities Canada; Natural Resources Canada; and Public Safety Canada to provide guidance on</p> <ul style="list-style-type: none"> defining which direct, indirect, or other types of adaptation actions to include and prioritize within the Government of Canada Adaptation Action Plan applying the National Adaptation Strategy's 4 guiding principles for all federal actions 	<p>Environment and Climate Change Canada's response. Agreed. By May 31, 2026 ECCC will work with HC, HICC, NRCan, and PS to develop and communicate guidance on the types of adaptation actions to include in the Government of Canada Adaptation Action Plan expected to be updated as early as in the months following the next federal budget.</p> <p>By January 31, 2026 ECCC will communicate to implementing departments the guiding principles' inclusion in government decision making tools, highlighting their consideration for all adaptation proposals.</p>
<p>1.50 Environment and Climate Change Canada, working with Health Canada; Housing, Infrastructure and Communities Canada; Natural Resources Canada; and Public Safety Canada, should improve the National Adaptation Strategy framework for whole-of-society measuring and monitoring by</p> <ul style="list-style-type: none"> ensuring that all future targets are SMART (Specific, Measurable, Achievable, Relevant, and Time-bound) and that all relevant Sustainable Development Goals are linked to targets developing interim targets or an approach to course correct to ensure that actions to reach the targets are on the right path and to measure progress before their end dates linking all adaptation actions to the targets and indicators developing a system to collect and monitor data to assess progress toward objectives and targets and developing mechanisms to course correct 	<p>Environment and Climate Change Canada's response. Agreed. When new adaptation targets are added to the framework, ECCC will work with HC, HICC, NRCan, PS and other implementing departments, and partners to use SMART criteria and link to Sustainable Development Goals, where relevant. New targets are expected as part of an update to the adaptation strategy, expected by 2030.</p> <p>By January 31, 2026 ECCC will develop an approach to track progress on an interim basis and integrate mechanisms for course correction.</p> <p>ECCC will work with HC, HICC, NRCan, PS, and other implementing departments to expand work during the next update of the Government of Canada Adaptation Action Plan, expected to be updated as early as in the months following the next federal budget, to link relevant actions to adaptation targets and indicators.</p> <p>By March 31, 2026 ECCC will work with HC, HICC, NRCan, and PS to publish a website building on the initial Monitoring and Evaluation Framework.</p>
<p>1.52 In the spirit of course correction and in consideration of the United Nations Framework Convention on Climate Change guidelines and the Paris Agreement, Environment and Climate Change Canada, working with Health Canada; Housing, Infrastructure and Communities Canada; Natural Resources Canada; and Public Safety Canada, should comprehensively report more than once between the date of the release of the National Adaptation Strategy released in 2023 and the next iteration in 2030.</p>	<p>Environment and Climate Change Canada's response. Agreed. ECCC will include detailed reporting on the status of the National Adaptation Strategy in the biennial reports it provides under the United Nations Framework Convention on Climate Change. In addition, an assessment will be made to determine whether additional stand-alone domestic reporting would provide material benefit at this stage of implementation.</p>

Appendix—Text Descriptions of Exhibits

Exhibit 1.1—Costs and insurable losses in Canada due to extreme weather events from 1983 to 2024—Text description

This bar and line chart shows the costs and insurable losses in 2024 dollars for extreme weather events between 1983 and 2024. The line across the chart shows the exponential trend from almost zero dollars in 1983 to gradually increasing to \$1 billion in 2010 then rising steeply to about \$4 billion in 2024.

The bars show:

1996: Quebec floods, \$1.2 billion. An illustration shows a house with water under it.

1998: Quebec ice storm, \$3.0 billion. An illustration shows a cloud with icicles.

2005: Ontario wind and rain storms, \$1.6 billion. An illustration shows drops of rain and gusts of wind.

2013: Alberta and Toronto floods, \$4.1 billion. An illustration shows a house with water under it.

2016: Fort McMurray wildfire, \$6.4 billion. An illustration shows trees and flames.

2021: British Columbia floods, \$2.6 billion. An illustration shows a house with water under it.

2022: Ontario and Quebec windstorm, \$3.6 billion. An illustration shows gusts of wind.

2023: British Columbia wildfires and Nova Scotia floods, \$3.7 billion. An illustration shows trees and flames and an illustration shows a house with water under it.

2024: Calgary hailstorm and Toronto floods, \$8.6 billion. An illustration shows a cloud with hail and a house with water under it.

Note: An insurable loss is 1 event costing \$30 million or more. For 1983 to 2022, losses were quoted in the 2023 Insurance Bureau of Canada Fact Book and adjusted using the inflation calculator (Bank of Canada) to 2024 dollars. For 2023 and 2024, losses were quoted on the Insurance Bureau of Canada website.

Source: Adapted from data from the Insurance Bureau of Canada and CatIQ

[Back to Exhibit 1.1](#)

Exhibit 1.2—The National Adaptation Strategy whole-of-society structure—Text description

This illustration shows a house structure divided horizontally by the 3 parts of the National Adaptation Strategy.

Under the roof are the 3 implementation components:

- Government of Canada Adaptation Action Plan, which comprises 73 actions (actions include programs and initiatives)
- Indigenous Climate Leadership Agenda
- Federal, Provincial and Territorial Bilateral Action Plans

In the centre are the 5 systems / leading departments:

- Disaster resilience / Public Safety Canada
- Health and well-being / Health Canada

- Nature and biodiversity / Environment and Climate Change Canada
- Infrastructure / Housing, Infrastructure and Communities Canada
- Economy and workers / Natural Resources Canada

The bottom level shows the 4 guiding principles:

- Respect jurisdictions and uphold Indigenous peoples' rights
- Advance equity and climate and environmental justice
- Take proactive, risk-based measures to reduce climate impacts before they occur
- Maximize benefits and avoid maladaptation

[Back to Exhibit 1.2](#)

Exhibit 1.3—Canada was one of the last Organisation for Economic Co-operation and Development countries to develop a national adaptation strategy—Text description

This illustration shows a timeline from 2006 to 2023 showing the following:

2006: France—First National Adaptation Plan (NAP); Commissioner of the Environment and Sustainable Development—First recommends a NAP for Canada

2008: Germany—First NAP

2010: Commissioner of the Environment and Sustainable Development—Second recommendation for a NAP for Canada

2011: France—Second NAP; Germany—Second NAP

2013: United Kingdom—First NAP

2015: Germany—Third NAP; Japan—First NAP

2018: France—Third NAP; United Kingdom—Second NAP; Japan—Second NAP

2020: Germany—Fourth NAP

2021: Japan—Third NAP

2023: United Kingdom—Third NAP; Canada—First NAP

Note: A sample of 5 of the 38 Organisation for Economic Co-operation and Development countries are represented in this exhibit.

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**Exhibit 1.6—The National Adaptation Strategy’s (NAS) actions, indicators, targets, and objectives were not connected and not able to measure whole-of-society adaptation progress—
Text description**

This illustration shows 4 elements that should be linked: actions, NAS indicators, NAS targets, and NAS objectives. The 3 components of actions show that both the Federal, Provincial and Territorial Bilateral Action Plans and the Indigenous Leadership Climate Agenda were not established and therefore had no actions. The Government of Canada Adaptation Action Plan had established 73 actions. However, there is a chain with broken links between the actions and the NAS indicators and between the NAS indicators and NAS targets. There is a chain with solid links between the NAS targets and the NAS objectives but since the other connections are missing it was not possible to measure adaptation progress for the whole of society.

[Back to Exhibit 1.6](#)

