

# Government of Canada

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> <u>Directive on the Management of Real Property</u>

# Directive on the Management of Real Property



### Note to reader

Effective February 26, 2025, the *Directive on the Management of Real Property* includes the following:

- 1. Amendments to due diligence requirements, specifically, new subsection 4.2.24; and
- 2. Addition of Appendix E: Standard on Due Diligence.

Effective March 5, 2025, the *Directive on the Management of Real Property* includes the following:

- 1. Amendments to Appendix B: Mandatory Procedures for Appraisals and Estimates to remove the requirement to obtain an appraisal when there is a transfer of administration between federal departments at a value less than or equal to net book value.
- 2. Amendments to Appendix D: Standard on Barrier-Free Access to Real Property to align with recent updates to the CSA Group's Accessible Design for the Built Environment standard.

### 1. Effective date

- 1.1 This directive takes effect on May 13, 2021.
- 1.2 This directive and its appendices replace the following Treasury Board instruments:
  - sections of the <u>Policy on Management of Real Property</u>
     (November 1, 2006)
  - <u>Directive on the Sale or Transfer of Surplus Real Property</u>
     (November 1, 2006)
  - o <u>Accessibility Standard for Real Property</u> (November 1, 2006)
  - <u>Appraisals and Estimates Standard for Real Property</u>
     (November 1, 2006)
  - o Reporting Standard on Real Property (November 1, 2006)
  - o Fire Protection Standard (April 1, 2010)

### 2. Authorities

2.1 This directive is issued pursuant to the same authorities indicated in section 2 of the *Policy on the Planning and Management of Investments* and subsection 149(1) of the *Financial Administration Act*.

## 3. Objectives and expected results

- 3.1 The objective of this directive is that real property is planned, acquired, used, and disposed of in a manner that supports the delivery of programs and services to Canadians while ensuring best value to the Crown.
- 3.2 The expected results of this directive are as follows:

- 3.2.1 Real property is managed in a manner that enables operational outcomes, demonstrates sound stewardship and provides best value, consistent with the Government of Canada's socio-economic and environmental objectives;
- 3.2.2 Real property decisions are based on risk management practices, performance information and an assessment of full life-cycle costs;
- 3.2.3 Effective governance and oversight mechanisms are in place to support the management of real property;
- 3.2.4 Opportunities for collaboration are considered in real property decisions;
- 3.2.5 Workforce capacity for real property management is developed and maintained commensurate with organizational need;
- 3.2.6 Transactions related to real property are fair, open and transparent, and demonstrate due diligence; and
- 3.2.7 Acknowledging the relationship between Indigenous peoples and the land, real property management decisions contribute to reconciliation with Indigenous peoples.

### 4. Requirements

### Senior designated official(s) for the management of real property

4.1 The senior designated official(s) for the management of real property in a custodian department is responsible for the following:

- 4.1.1 Establishing, implementing and maintaining a department-wide real property management framework consisting of processes, systems and controls that:
  - 4.1.1.1 Include oversight, planning and reporting mechanisms;
  - 4.1.1.2 Incorporate performance results and lessons learned to inform real property decision-making;
  - 4.1.1.3 Include an information system that:
    - 4.1.1.3.1 Enables the collection and generation of comprehensive and accurate data on real property holdings, operations and transactions;
    - 4.1.1.3.2 Enables year-over-year comparison;
    - 4.1.1.3.3 Is linked to departmental financial information systems and processes;
    - 4.1.1.3.4 Enables the development and maintenance of a portfolio-level decarbonization plan; and
    - 4.1.1.3.5 Supports government-wide reporting requirements;
  - 4.1.1.4 Contribute the real property perspective to departmental planning functions, including ensuring that the real property portfolio strategy inputs to the department's investment plan are in

accordance with the <u>Policy on the Planning and</u>

<u>Management of Investments</u>, Appendix A:

Mandatory Procedures for Investment Plans; and

- 4.1.1.5 Facilitate collaboration between real property officials and program leads to enable informed and integrated real property management decisions;
- 4.1.2 Providing advice to the deputy head on:
  - 4.1.2.1 The nature, structure and resourcing of the department's real property management function;
  - 4.1.2.2 Significant gaps in performance and issues of non-compliance with the requirements of this directive;
  - 4.1.2.3 The department's real property portfolio strategy;
  - 4.1.2.4 Investments required to maintain the integrity of the department's real property portfolio and to optimize its operational efficiency, environmental performance and climate resiliency; and
  - 4.1.2.5 Seeking the necessary Treasury Board approvals when the value of a transaction will exceed the <a href="Transaction Approval Limits and Conditions for the Acquisition or Disposition of Real Property">Transaction Approval Limits and Conditions for the Acquisition or Disposition of Real Property;</a>

- 4.1.3 Identifying and managing the department's needs with respect to the necessary competencies, capacity, and professional development in real property management;
- 4.1.4 Ensuring the development, implementation and monitoring of a real property portfolio strategy;
- 4.1.5 Cultivating relationships with Indigenous peoples on matters related to real property;
- 4.1.6 Ensuring that real property transactions are conducted in a manner that:
  - 4.1.6.1 Is fair,
  - 4.1.6.2 Aligns with commercial real estate practices,
  - 4.1.6.3 Respects treaties and other agreements between the Crown and Indigenous peoples, and
  - 4.1.6.4 Includes an open solicitation of offers unless the minister is satisfied that the nature of the transaction would make an open solicitation of offers inappropriate or not in the public interest;
- 4.1.7 Ensuring compliance with appropriate building codes, fire codes and applicable specialized standards;
- 4.1.8 Investigating serious fires, in cooperation with local authorities, and ensuring that resulting recommendations are addressed; and

- 4.1.9 Certifying annually to the Treasury Board of Canada Secretariat the completeness and accuracy of the information submitted to the:
  - 4.1.9.1 <u>Directory of Federal Real Property</u>;
  - 4.1.9.2 <u>Federal Contaminated Sites Inventory</u>; and
  - 4.1.9.3 <u>Government of Canada's Greenhouse Gas</u> <u>Emissions Inventory</u>.

#### **Real property practitioners**

4.2 Real property practitioners in a custodian department are responsible for the following:

### **Engagement with Indigenous peoples**

4.2.1 Engaging Indigenous peoples on matters related to real property to fulfill duties and obligations of the Crown, and respond to interests as appropriate;

### Planning and governance

- 4.2.2 Supporting the senior designated real property official(s) in establishing, implementing and maintaining the real property management framework;
- 4.2.3 Operating and maintaining a real property information system;
- 4.2.4 Monitoring the functionality, utilization, and physical, environmental and financial performance of real property assets over their life-cycle;

4.2.5 Developing the real property portfolio strategy;

### Stewardship and use

- 4.2.6 Maintaining the physical performance and functionality of real property;
- 4.2.7 Supporting the optimization of the real property portfolio by identifying real property that is underutilized, inefficient or no longer needed for departmental programs in order to:
  - 4.2.7.1 Better utilize the property in the context of the real property portfolio strategy;
  - 4.2.7.2 Dispose of surplus real property; or
  - 4.2.7.3 Manage surplus real property that cannot be disposed of in a way that reduces costs while minimizing Crown liability;
- 4.2.8 Identifying opportunities to share special-purpose real property by assessing the costs and benefits of co-locating with other federal departments, other levels of government, and other organizations that have complementary objectives;
- 4.2.9 Charging the following in co-occupation and lease-out situations:
  - 4.2.9.1 Costs of occupation, on a prorated basis, to other federal departments, other levels of government, and public institutions, such as universities, that co-occupy special-purpose real property, in order

to advance or support complementary objectives; or

- 4.2.9.2 Market rent in all other situations where a party occupies underutilized federal real property that is still needed for program purposes;
- 4.2.10 Having occupancy, lease or licence agreements that set out the roles and responsibilities of the parties involved;
- 4.2.11 Ensuring that parties not subject to this directive that occupy federal real property do not impede the delivery of federal programs and departmental compliance with the requirements of this directive;
- 4.2.12 Consulting with the Department of Justice Canada,
  Indigenous Services Canada, and Crown-Indigenous
  Relations and Northern Affairs Canada when the Crown
  contemplates a change in use of real property;
- 4.2.13 Consulting with Indigenous peoples when there is a legal duty to consult about an intent to dispose of real property;
- 4.2.14 Notifying official language minority communities of the intent to dispose of real property and, in accordance with the <u>Official Languages Act</u>, consulting with English or French linguistic minority communities and other stakeholders, including school boards or commissions, in the province or territory where the federal real property or federal immovable is located;

- 4.2.15 Considering opportunities to co-own, co-manage, or share the use of real property with Indigenous groups, recovering costs as and where appropriate;
- 4.2.16 Limiting the negative environmental impact of real property in a way that is consistent with the government's sustainable development objectives, including reducing or avoiding to the degree possible:
  - 4.2.16.1 Waste production;
  - 4.2.16.2 Resource and energy use;
  - 4.2.16.3 Greenhouse gas emissions; and
  - 4.2.16.4 Site contamination;
- 4.2.17 Taking immediate and reasonable action to mitigate risk to human health and to the environment in the event of contamination, before assessing a future course of action;
- 4.2.18 Managing contaminated sites by:
  - 4.2.18.1 In Canada, following standards and guidelines endorsed by the Canadian Council of Ministers of the Environment, or their equivalents;
  - 4.2.18.2 Outside of Canada, complying with applicable environmental legislation or regulations and, where none exist, adopting appropriate Canadian best practices to minimize the impacts of contamination;

- 4.2.18.3 Assessing suspected and known contaminated sites to determine the most appropriate, sustainable, and cost-effective action;
- 4.2.18.4 Prioritizing remediation or risk management activities on sites that pose the highest risk to human health and the environment; and
- 4.2.18.5 Undertaking site remediation or risk management to the extent required for current or intended federal use, unless the department can demonstrate that more stringent remediation would represent best value to the federal government;
- 4.2.19 Implementing the commitments set out in the <u>Greening</u> <u>Government Strategy</u>;
- 4.2.20 Considering diversity, including gender identity and gender expression, in the design and provision of built amenities;
- 4.2.21 Conserving the heritage value of federal heritage properties in Canada by following the procedures set out in Appendix A: Mandatory Procedures for Heritage Assessment and Conservation;
- 4.2.22 Conducting appraisals and estimates following Appendix B: Mandatory Procedures for Appraisals and Estimates;
- 4.2.23 Providing barrier-free access to federal real property as prescribed in Appendix D: Standard on Barrier-Free Access to Real Property;

#### **Transactions**

4.2.24 Conducting due diligence before acquiring, disposing, or transferring administration of real property as prescribed in Appendix E: Standard on Due Diligence

### Acquisition

- 4.2.25 Validating the need for acquiring real property based on program needs and on the real property portfolio strategy;
- 4.2.26 Undertaking a full life-cycle analysis, before acquiring a real property asset or interest, to seek best value;
- 4.2.27 Justifying the amount paid for transfers of administration from agent Crown corporations, transfers of administration and control, and purchases of real property, including any goods and services acquired through these transactions, in relation to market value as set out in Appendix B: Mandatory Procedures for Appraisals and Estimates;

### Disposal

- 4.2.28 Disclosing the results of due diligence measures to prospective purchasers, where appropriate;
- 4.2.29 Consulting with the Department of Justice Canada,
  Indigenous Services Canada, and Crown-Indigenous
  Relations and Northern Affairs Canada when the Crown
  contemplates a disposal of real property by way of sale,
  exchange, gift, easement, transfer of administration, or
  transfer of administration and control;

- 4.2.30 Notifying CLC of the intent to dispose of real property;
- 4.2.31 Consulting with Canada Lands Company CLC Limited (CLC) to identify surplus real property for potential sale to CLC when any of the following criteria may apply:
  - 4.2.31.1 The size of the property or the value of the sale could negatively affect markets if it is not appropriately managed;
  - 4.2.31.2 There is an opportunity to add value through redevelopment;
  - 4.2.31.3 Partnerships with other organizations could be the best mechanism to increase benefits to the government and to Canadians; or
  - 4.2.31.4 Sensitive policy issues exist;
- 4.2.32 Collecting expressions of public purpose interest in all or a portion of the site simultaneously from federal departments, agent Crown corporations, provinces, municipalities, and Indigenous groups;
- 4.2.33 Providing CLC the opportunity to acquire properties identified under subsection 4.2.31;
- 4.2.34 Obtaining confirmation from CLC that it has been engaged but elected not to acquire a site that meets any of the criteria in subsection 4.2.31;
- 4.2.35 Granting priority to acquire for public purpose, properties that do not meet the criteria identified in subsection 4.2.31,

or sites CLC has elected not to acquire, in the following order:

- 4.2.35.1 federal departments;
- 4.2.35.2 agent Crown corporations;
- 4.2.35.3 provinces;
- 4.2.35.4 municipalities and Indigenous groups;
- 4.2.36 Ensuring that identified public purpose interests, and an expectation to reasonably address them where feasible, are included in agreements with CLC;
- 4.2.37 Developing a business case for the disposal of surplus real property, supported by the valuation that was determined in accordance with Appendix B: Mandatory Procedures for Appraisals and Estimates;
- 4.2.38 Mitigating the risk associated with the disposal of sites containing contamination by any of the following:
  - 4.2.38.1 Remediating the sites or taking action to manage the risks associated with the contamination before disposing of the sites;
  - 4.2.38.2 Requiring that the acquiring party remediate the site after disposal;
  - 4.2.38.3 Ensuring the legal transfer of environmental liability to the acquiring party;

- 4.2.39 Transferring administration of real property to other federal departments and exchanging funds at a value to be agreed upon between the departments, but no greater than the market value determined according to the procedures set out in Appendix B: Mandatory Procedures for Appraisals and Estimates;
- 4.2.40 Justifying the amount paid for transfers of administration to agent Crown corporations, transfers of administration and control, and sales of real property, in relation to market value according to the procedures set out in Appendix B:

  Mandatory Procedures for Appraisals and Estimates; and

### Reporting

4.2.41 Ensuring that information is reported in accordance with Appendix C: Mandatory Procedures for Reporting.

### 5. Roles of other government organizations

- 5.1 This section identifies the roles of other key government organizations in relation to this directive. In and of itself, this section does not confer any authority.
  - 5.1.1 Parks Canada is responsible for the following:
    - 5.1.1.1 Establishing evaluation criteria and the process for designating federal heritage properties;
    - 5.1.1.2 Developing policies, standards and guidelines, and providing advice and recommendations to other departments for the conservation of federal

heritage properties and archaeological sites on federal lands; and

- 5.1.1.3 Maintaining a directory of federal heritage properties, including federal heritage buildings, national historic sites, heritage lighthouses, and heritage railway stations.
- 5.1.2 The Chief Appraiser of Canada at Public Services and Procurement Canada is responsible for providing appraisals used for real property conveyances.

### 6. Application

- 6.1 This directive applies to the organizations listed in section 6 of the <u>Policy on the Planning and Management of Investments</u> that have or will have administration of real property, within the meaning of section 18 of the <u>Federal Real Property and Federal Immovables Act</u>.
- 6.2 For the purposes of the interpretation of this directive in the Province of Quebec, "real property" means "immovable" within the meaning of civil law in the Province of Quebec and includes the rights of a lessee in respect of such an immovable.
- 6.3 Reporting requirements in subsection 4.2.41 of this directive also apply to the following organizations, unless specific acts or regulations override it:
  - 6.3.1 Directory of Federal Real Property: agent Crown corporations, within the meaning of subsection 83(1) of the *Financial Administration Act*; and

6.3.2 Federal Contaminated Sites Inventory: consolidated Crown corporations as described in the Public Accounts of Canada.

### 7. References

This directive should be read in conjunction with the following legislation and policy instruments. Although items listed are considered the most relevant to departments' and agencies' ability to comply with the requirements in this directive, the list should not be considered exhaustive.

### 7.1 Legislation

- Accessible Canada Act
- o <u>Canada Labour Code, Part II</u>
- Canada Marine Act
- Canada National Parks Act
- Canadian Environmental Assessment Act
- o Canadian Environmental Protection Act, 1999
- <u>Canadian Human Rights Act</u>
- <u>Department of Natural Resources Act</u>
- <u>Department of Public Works and Government Services Act</u>
- Employment Equity Act
- Expropriation Act
- o <u>Federal Real Property and Federal Immovables Act</u>
- Financial Administration Act
- Fisheries Act
- Heritage Lighthouse Protection Act
- o <u>Historic Sites and Monuments Act</u>
- <u>Impact Assessment Act</u>
- Indian Act
- <u>Migratory Birds Convention Act, 1994</u>

- National Capital Act
- National Research Council Act
- Northwest Territories Act
- Nunavut Act
- Official Languages Act
- Parks Canada Agency Act
- Species at Risk Act
- Territorial Lands Act
- <u>United Nations Declaration on the Rights of Indigenous Peoples</u>
   <u>Act</u>
- Yukon Act
- Canada Occupational Health and Safety Regulations
- o <u>Federal Real Property and Federal Immovables Regulations</u>
- Public Lands Mineral Regulations
- Public Lands Oil and Gas Regulations
- o Rideau Canal Lease Regulations
- o <u>Territorial Land Use Regulations</u>

### 7.2 Related policy instruments

- Policy on Communications and Federal Identity
- o <u>Policy on the Planning and Management of Investments</u>
- o Policy on Financial Management
- Policy on Government Security
- o Policy on People Management
- <u>Directive on Government Contracts, Including Real Property</u>
   <u>Leases, in the Nunavut Settlement Area</u>
- o <u>Directive on the Management of Projects and Programmes</u>
- o <u>Directive on the Management of Procurement</u>
- <u>Directive on Management of Materiel</u>
- <u>Directive on Accounting Standards</u>

- <u>Directive on Security Management</u>
- Occupational Health and Safety Directive
- <u>Guide to the Federal Real Property Act and Federal Real</u>
   <u>Property Regulation</u>
- Guide to the Management of Real Property
- <u>Guide to Portfolio Management and the Real Property Portfolio</u>
   <u>Strategy</u>
- Guide to Real Property Management: Aboriginal Context
- <u>Guide to Requesting Capacity-Based Real Property Transaction</u>
   <u>Approval Limits</u>
- Greening Government Strategy
- <u>Transaction Approval Limits and Conditions for the</u>
   <u>Acquisition and Disposition of Real Property</u>

### 8. Enquiries

8.1 For interpretation of any aspect of this directive, contact <u>Treasury</u>
<u>Board of Canada Secretariat Public Enquiries</u>.

## Appendix A: Mandatory Procedures for Heritage Assessment and Conservation

### A.1 Effective date

- A.1.1 These procedures take effect on May 13, 2021.
- A.1.2 These procedures replace sections of the following Treasury Board policy instruments:

<u>Policy on Management of Real Property</u>
 (November 1, 2006)

#### A.2 Procedures

- A.2.1 These procedures provide details on the requirements set out in subsection 4.2.21 of the *Directive on the Management* of Real Property.
- A.2.2 Real property practitioners must apply the mandatory procedures described below.
  - A.2.2.1 Seek a heritage evaluation of any building
    50 years of age or older from the Federal Heritage
    Review Office at Parks Canada when the building
    is:
    - A.2.2.1.1 Crown-owned; or
    - A.2.2.1.2 Planned for acquisition by purchase;
  - A.2.2.2 Consult with the Federal Heritage Review Office at Parks Canada before undertaking any intervention that may impact the heritage value of a federal heritage property or an archaeological site on federal land, to ensure that appropriate heritage conservation advice is obtained;
  - A.2.2.3 Consult with the Federal Heritage Review Office at Parks Canada before deciding to decommission, dispose (including lease-out), or demolish a

federal heritage property or its components, to ensure that best efforts are made to conserve the heritage value of the federal heritage property.

# Appendix B: Mandatory Procedures for Appraisals and Estimates

### **B.1** Effective date

- B.1.1 These procedures take effect on May 13, 2021.
- B.1.2 These procedures replace sections of the following Treasury Board policy instruments:
  - <u>Policy on Management of Real Property</u>
     (November 1, 2006)
  - <u>Appraisals and Estimates Standard for Real</u>
     <u>Property</u> (November 1, 2006)

### **B.2 Procedures**

- B.2.1 These procedures provide details on the requirements set out in subsections 4.2.22, 4.2.24, 4.2.27, 4.2.37, 4.2.39 and 4.2.40 of the *Directive on the Management of Real Property*.
- B.2.2 Real property practitioners must apply the mandatory procedures described below.
  - B.2.2.1 Obtain at least one appraisal from the Chief Appraiser of Canada before acquiring or disposing of real property, except:

- B.2.2.1.1 When there will be an open solicitation of offers and the total value of the real property interest is anticipated to be less than \$500,000; in this situation, obtain at least one current estimate of the market value;
- B.2.2.1.2 When there is no open solicitation of offers and the value of the lease or licence is anticipated to be less than \$25,000 total consideration; in this situation, obtain at least one current estimate of the market value;
- B.2.2.1.3 When there is a transfer of administration between federal departments at a value less than or equal to net book value, no appraisal or estimate of the market value is required;
- B.2.2.2 Segregate transaction and valuation responsibilities related to real property transactions.

## Appendix C: Mandatory Procedures for

### Reporting

#### C.1 Effective date

- C.1.1 These procedures take effect on May 13, 2021.
- C.1.2 These procedures replace sections of the following Treasury Board policy instruments:
  - <u>Policy on Management of Real Property</u>
     (November 1, 2006)
  - <u>Reporting Standard for Real Property</u> (November 1, 2006)

#### C.2 Procedures

- C.2.1 These procedures provide details on the requirements set out in subsection 4.2.41 of the <u>Directive on the Management</u> of Real Property.
- C.2.2 Real property practitioners, except for those in custodian departments that have been excluded from full reporting by decision of the Executive Director of the Investment Management Directorate, Treasury Board of Canada Secretariat, must apply the mandatory procedures described below.

Reporting information for inclusion in the Directory of Federal Real Property (DFRP) and the Federal Contaminated Sites Inventory (FCSI)

- C.2.2.1 Inform the Treasury Board of Canada Secretariat of designated officials, including the authorized official, official contact, financial contact (where applicable), and data submitters for the DFRP and FCSI;
- C.2.2.2 Input reports to the DFRP and FCSI as prescribed in the applicable input guides;
- C.2.2.3 Provide new or revised information, with the exception of the data specified in subsection C.2.2.4, for inclusion in the DFRP and FCSI within 90 days of a change, including acquisition, disposal, amendment to an existing record, or change in the organization's contacts;
- C.2.2.4 Report annual expenditure, liability and site performance data to the FCSI at fiscal year-end;
- C.2.2.5 Support the annual certification of the completeness and accuracy of organizational records and contacts in the DFRP and FCSI as prescribed in the applicable input guides;
- C.2.2.6 Reconcile all DFRP and FCSI records and applicable fields with internal real property and building management systems, contaminated site management systems, and financial systems;
- C.2.2.7 Reconcile FCSI annual financial records with the financial statements submitted for the Public Accounts of Canada;

### Reporting to the Centre for Greening Government

- C.2.2.8 Inform the Centre for Greening Government of designated officials, including the authorized official, official contact, and data submitters for the Government of Canada's Greenhouse Gas Emissions Inventory;
- C.2.2.9 Provide required data for inclusion in the Government of Canada's Greenhouse Gas Emissions Inventory in accordance with the annual call letter, the <u>Federal Greenhouse Gas Accounting and Reporting Guidance</u>, and other applicable input guides;
- C.2.2.10 Support the annual certification of the completeness and accuracy of organizational data submitted in accordance with the <u>Federal</u>

  <u>Greenhouse Gas Accounting and Reporting Guidance</u> and other applicable input guides.

# Appendix D: Standard on Barrier-Free Access to Real Property

### **D.1** Effective date

- D.1.1 This standard takes effect on May 13, 2021.
- D.1.2 This standard replaces the <u>Accessibility Standard for Real</u>

  <u>Property</u> (November 1, 2006) and sections of the <u>Policy on</u>

  <u>Management of Real Property</u> (November 1, 2006).

#### **D.2 Standards**

- D.2.1 This standard provides details on the requirements set out in subsection 4.2.23 of the <u>Directive on the Management of Real Property</u>.
- D.2.2 Real property practitioners must apply this standard as described below.
  - D.2.2.1 Ensure that where amenities are provided on federal real property they are accessible and barrier free and:
    - D.2.2.1.1 If in Canada, they follow the Canadian Standards Association's <u>Accessible</u>

      <u>Design for the Built</u>

      <u>Environment (CAN/ASC B651)</u>, cobranded by CSA Group and Accessibility Standards Canada; and
    - D.2.2.1.2 If outside of Canada, they align with the requirements of the local jurisdiction;
  - D.2.2.2 Ensure that an accessible route from the main entrance is provided to accessible parking spaces, local public transit stops and all drop-off areas that are located within the limits of federal real property;
  - D.2.2.3 Equip classrooms, auditoriums, meeting rooms and theatres of more than 100 square metres

with an assistive listening system encompassing the entire seating area;

D.2.2.4 Provide signage and audiovisual indicators for wayfinding and security;

### **Exceptions and minor variations**

- D.2.3 Real property practitioners must do the following in relation to exceptions and minor variations when applying this standard.
  - D.2.3.1 Establish internal procedures for identifying and seeking deputy head approval of exceptions from the accessibility requirements of this standard;
  - D.2.3.2 Permit minor variations from the requirements, on a case-by-case basis, if consistent with the general intent of this standard, as long as the overall accessibility is maintained;
  - D.2.3.3 Where the accessibility requirements of this standard will significantly reduce the heritage quality of the real property, some deviation is permitted; however, the following must be ensured:
    - D.2.3.3.1 Access to at least the main level of the building;
    - D.2.3.3.2 Where washroom facilities are inaccessible, equivalent facilities that are accessible shall be provided;

- D.2.3.4 Reassess exceptions to ensure that they are still justified when initial criteria for the exceptions change; and
- D.2.3.5 Document rationale and maintain records of all approved exceptions and minor variations.

### **Appendix E: Standard on Due Diligence**

#### E.1 Effective date

E.1.1 This standard takes effect on February 26, 2025.

#### E.2 Standard

- E.2.1 This standard provides details on the requirement set out in subsection 4.2.24 of the *Directive on the Management of Real Property*.
- E.2.2 Standards are as follows:
  - E.2.2.1 Real property practitioners must conduct the following due diligence activities before acquiring, disposing, or transferring administration of real property:

Due Diligence Activity	Acquisition of Real Property	Disposal of Real Property	Transfer of Administration of Real Property
i. Title, including asserted or established Aboriginal or treaty rights	Required	Required	Required
ii. Environmental Condition	Required	Required	As appropriate
iii. Environmental Performance	Required	Not applicable	As appropriate
iv. Physical Performance	Required	Required	As appropriate
v. Market Value, except as described in subsection 2.2.1.3 of Appendix B: Mandatory Procedures for Appraisals and Estimates	Required	Required	As appropriate
vi. Heritage Value, including for archaeological sites	As appropriate	As appropriate	As appropriate
vii. Security Considerations	As appropriate	As appropriate	As appropriate
viii. Accessibility Considerations	As appropriate	Not applicable	As appropriate

### **Appendix F: Definitions**

Definitions to be used in the interpretation of this directive can be found in Appendix C of the *Policy on the Planning and Management of Investments*.

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ISBN:

**Date modified:** 2025-05-27