Feedback for Canada's draft National Strategy Respecting Environmental Racism and Environmental Justice 2026-2031

Prepared on behalf of **Shake Up The Establishment**
For **Environment and Climate Change Canada**
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ABOUT SHAKE UP THE ESTABLISHMENT (SUTE)

Shake Up The Establishment (SUTE) is a national youth-led registered not-for-profit organization (#1190975-4) that focuses on promoting climate justice within the geographical confines of what is currently known as "Canada". We use an intersectional approach to promote non-partisan political advocacy, craft accessible evidence-informed educational resources to improve climate and environmental literacy and work to collaborate directly with underserved and structurally vulnerable communities to address injustices. Although we are a national organization with team members from across what is currently Canada, our founders dreamt up, organized and registered this organization upon Treaty 3 lands, belonging to the Erie, Neutral, Huron-Wendat, Haudenosaunee and Mississaugas Peoples. We acknowledge that our actions as an organization and the work that we put out have an impact on these lands and upon all that call it home. We are humbled to be able to follow the lead of Indigenous-led efforts towards the protection and stewardship of this environment since time immemorial across these lands we currently call 'Canada.' We honour the contributions of Indigenous, Black and other racialized peoples within the climate justice space and recognize their resiliency in the face of systemic oppression imposed by the settler colonial state. We aim to incorporate joy, rest and dreaming of futures throughout our work, particularly for racialized and/or Indigenous Peoples, women and gender-diverse peoples, low-income, neurodiverse, and (dis)abled youth, to help craft a more sustainable movement. We want to make space for people to reflect on their relationship to lands they live, work and thrive upon, and encourage all to show up responsibly and in solidarity with Indigenous communities to care for and nourish each other and these lands accordingly.

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About This Report

Shake Up The Establishment (SUTE) is a national, intersectional environmental and climate justice organization advocating for the advancement of anti-colonial, community-centred environmental policies and decision-making. Over the years, SUTE has engaged in extensive campaigning and advocacy calling for the passage of Bill C-230, and then Bill C-226, in hopes of seeing federal policy that supports communities being impacted by environmental injustices across the country. SUTE has been a member of the Canadian Coalition for Environmental and Climate Justice (CCECJ) since 2021, working alongside the members to advocate for the passage of federal environmental justice legislation, and celebrating when our grassroots efforts finally succeeded. After a long-awaited consultation, SUTE submitted feedback on the four environmental justice foundations in the Fall of 2025, before waiting again for the release of the draft Strategy.

After years of advocacy and community engagement, we are disappointed in the draft Strategy released in June 2026. From the plethora of grammatical errors, to the obfuscation of the study methods and results, and the overall lack of any measurable commitments, the Strategy is not meeting the expectations set out in the legislation, or the needs of communities that have spent decades calling for government action. In conversation with staff at Environment and Climate Change Canada (ECCC) who have been working on the Strategy, it is clear that the federal government expects communities to explicitly lay out their expectations, so that is what we have done in this report. Alongside conducting a line-by-line review and providing detailed feedback, our team has drafted a Dream Strategy with text we recommend you use for the final Strategy, which lays out measurable commitments, indicates expected timelines and identifies responsible federal bodies to take action to address environmental injustices across the country.

Finally, in recognition of the federal government's failure to submit a Treasury Board application for the Act, and refusal to dedicate funding towards community consultations for the Strategy, Shake Up The Establishment fundraised to host the **only in-person community consultations on the draft Strategy**. We urge the government to review these as part of their requirements to engage in all materials shared:

Community Feedback on Environmental Racism and Environmental Justice Collected at Toronto Climate Week

Community Feedback on Environmental Racism and Environmental Justice Collected at Khatsahlano Street Fair and Vancouver Climate Week

Endorsements

Mental Health and Climate Change Alliance

Seniors for Climate Action Now!

re-generation

Women's Healthy Environments Network

Key Recommendations

1 Strengthen Governance, Accountability and Implementation

a) Explicitly acknowledge in the Strategy's introduction how settler-colonialism, structural racism, and discriminatory policies have historically and continue to disproportionately harm Indigenous, and racially and ethnically-minoritized communities.

b) Commit to the principle of non-regression, grounded in the Right to a Healthy Environment under the Canadian Environmental Protection Act, 1999, and establish an Environmental Justice Advisory Board and National Environmental Justice Secretariat to oversee implementation, coordinate research, and strengthen accountability across government.

c) Require annual public accountability reports, rather than five-year reporting cycles, and ensure every Strategy commitment identifies responsible department(s), implementation timelines, measurable indicators, funding commitments, and public reporting mechanisms.

d) Develop an Environmental Justice decision-making tool, modelled on Gender-Based Analysis Plus, require environmental justice training for all federal public servants, and strengthen coordination across federal departments and all orders of government.

e) Establish a dedicated environmental justice support function to help communities navigate jurisdictional responsibilities and access the appropriate government departments, decision-making processes, and remediation pathways.

2 Advance Community Participation, Indigenous Partnership and Environmental Justice

a) Establish accessible, ongoing community engagement processes that include in-person and virtual participation, participant compensation, childcare, transportation, interpretation, technology supports, and a federal Inclusive Engagement Framework.

b) Partner with trusted community organizations through long-term funding agreements to co-design and facilitate engagement, publish all "What We Heard" reports and community partnership reports, clearly explain how community recommendations informed the Strategy, and commit to implementing existing community recommendations while continuing ongoing engagement.

c) Uphold Indigenous rights through meaningful partnership, shared decision-making, Indigenous data sovereignty, implementation of relevant UNDRIP and Truth and Reconciliation Commission commitments, and adoption of Etuaptmumk (Two-Eyed Seeing).

d) Broaden the definition of environmental racism to reflect its structural drivers, frame environmental justice through an anti-colonial and intersectional lens, add Epistemic Justice as a fifth principle, strengthen access to justice, embed the Right to a Healthy Environment throughout the Strategy, translate restorative and distributive justice into concrete accountability, remediation, reparations, and resource reallocation, and reframe the Strategy's four guiding principles as testable standards that decisions can be measured against, rather than general aspirations.

3 Invest in Communities and Strengthen Financial Accountability

a) Establish an Environmental Reparations Fund alongside the Environmental Damages Fund, financed through penalties for high-polluting industries and dedicated to community-led remediation, recovery, healing, research, compensation, and environmental justice initiatives.

b) Open annual Environmental Damages Fund calls focused on environmental justice, establish a Community Consultation Accessibility Fund, and provide multi-year funding to community-serving organizations supporting engagement, outreach, community-led research, biomonitoring, and environmental justice programming.

c) Support workers affected by the transition away from polluting industries through retraining and employment supports, and compensate community organizations for the advocacy, education, consultation, and service delivery work they have undertaken in the absence of adequate government action.

Key Recommendations

4 Strengthen Research, Data and Evidence

a) Rewrite Part 2 of the Strategy in plain language and improve its organization, accessibility, methodological transparency, and statistical accuracy, ensuring the study states its actual findings, including which communities are most affected and the scale of inequities identified, and resolving the contradiction between claiming there is no universal data shortage and the Annex's own acknowledgement that its methods required specialized GIS software and trained analysts.

b) Expand the study to include newcomer and immigrant communities, gender, intersectionality, cumulative and workplace exposures, historical pollution, and disaggregated racial and ethnic data, while completing the qualitative analyses originally committed to under the Act.

c) Build and maintain a publicly accessible national environmental justice database and commit to ongoing community-led biomonitoring, cumulative exposure monitoring, and intersectional environmental health research.

d) Recognize and build upon existing community-led research and mapping initiatives, ensure all conclusions are consistently supported by evidence, and disseminate findings across relevant federal departments to support a whole-of-government approach.

5 Prevent Environmental Harm and Fulfil Legislative Obligations

a) Ensure federal funding does not support projects that undermine environmental justice objectives, including committing to a phased divestment from oil, gas, and LNG, while excluding industry from environmental justice decision-making and maintaining financial accountability through penalties and reparations.

b) Require federal decision-making to assess cumulative environmental, health, and social impacts, prioritize preventing future harms alongside remediating existing environmental injustices, and include concrete measures that directly reduce environmental exposures.

c) Ensure the Strategy fulfills the requirements of the National Strategy Respecting Environmental Racism and Environmental Justice Act by including compensation measures, identifying federal legislation requiring amendment, and embedding clear, measurable implementation commitments directly within the Strategy rather than deferring them to a future action plan.

Our Feedback, Section by Section

Introduction

The introduction of the Strategy lacks explicit acknowledgement of how racially-minoritized communities continue to be disproportionately exposed to environmental burdens and are excluded from environmental decision-making as a result of ongoing settler-colonialism and structural racism. It also fails to acknowledge how ongoing settler-colonial disruptions and structurally racist policies and practices perpetuate environmental disparities. There needs to be more accountability in the introduction on how privileged white settlers have benefited from unfair environmental advantages and have been buffered from the negative impacts from toxic industries, environmental hazards, and racist environmental policymaking that colonial institutions have sanctioned. Addressing this would make it clear how while everyone has the "right to a healthy environment" in Canadian law, the onus is on the federal government to rectify the legacy and ongoing disproportional environmental harm.

Feedback on the Current Draft

The Introduction opens with: "Royal Assent of the National Strategy Respecting Environmental Racism and Environmental Justice Act (the Act) marked an important national commitment to develop a Strategy to assess, prevent and address environmental racism." However, the background and context on environmental racism in this introduction do not explicitly state the disproportional harm Indigenous and racially and ethnically-minoritized communities experience as a result of environmental racism.[1,2] It is also not acknowledged how ongoing settler-colonial disruptions, the social construction of 'race', as well as racism have perpetuated environmental disparities.[1,2] It is stated that "Everyone in Canada should have the opportunity to enjoy a healthy, safe and sustainable environment," but it is not acknowledged how this has not been the case in Canada, historically or presently due to aforementioned structural factors.

[1] Waldron IRG. There's Something In The Water: Environmental Racism in Indigenous & Black Communities. Fernwood Publishing. Published April 02 2018. Accessed July 21 2026. fernwoodpublishing.ca/book/there8217s-something-in-the-water

[2] Jacobs, B. Environmental Racism on Indigenous Lands and Territories. I-Portal: Indigenous Studies Portal. Published May 20 2010. Accessed July 21 2026. iportal.usask.ca/record/28145

Our Dream Strategy

Settler-colonialism and structural racism have, and continue to, harm Indigenous, racially and ethnically-minoritized communities in Canada, placing them at an inherent disadvantage in institutions and societal spaces. The result of ongoing settler-colonial mechanisms of land dispossession and expropriation, racial capitalism, patriarchy, xenophobia, and entrenched racist policies and practices, has produced environmental disparities. These interlocking systems of oppression have positioned Indigenous and other racially-minoritized communities to be disproportionately exposed to toxic industries, waste, and environmental hazards and has furthered their exclusion from environmental decision-making and policies that impact their health and wellbeing. This historical and ongoing subjugation in systems, institutions, policies, and practices has made it very challenging for these communities to advocate for healthier environments they can thrive in.

What the Strategy is

Feedback on the Current Draft

The Strategy describes how "As Canada works to build a stronger economy, and create healthier more resilient communities, the Strategy aims to support more equitable benefits for affected communities." It is also stated how the Strategy "reflects the contributions of individuals and communities who have been advancing EJ for years," and how "their insights, advocacy, and lived experience guide and strengthen the federal approach." The purpose and central focus of this Strategy must be on how the federal government proposes to prevent and address environmental racism and advance environmental justice in collaboration with impacted communities. We question why economic interests are emphasized within the Strategy. In fact, Canada's economic potential seems to be prioritized over creating environmental protections, a stable climate, and healthier communities. We also question how this "Strategy aims to support more equitable benefits for affected communities," when the government has barely integrated community insights from the mandated consultations, or any actionable solutions to eliminate environmental racism.

Our Dream Strategy

As the Government of Canada works to create clean, safe, and healthy environments, a stable climate, and climate- resilient communities, the Strategy details how the federal government will redress environmental racism and support equitable benefits for affected communities. The federal government is committed to ensuring that there is only forward progress on environmental justice, with consideration for the principle of non-regression, which is foundational to the Implementation of the Right to a Healthy Environment under the Canadian Environmental Protection Act, 1999. To uphold this commitment, Environment and Climate Change Canada will establish an Environmental Justice Advisory Board, consisting of representatives from First Nations, Inuit, Métis, Black and other racially and ethnically-minoritized communities, low-income communities, and racialized newcomers and immigrants, who will engage in quarterly meetings with the Environmental Justice and Racism Team to ensure community accountability on government actions related to environmental justice. All members of the Advisory Board will receive living-wage compensation for their contributions.

How we listened and used evidence to shape the strategy

The opening of this section reads: "This Strategy was informed by input from engagement across a variety of activities and regions. The feedback received provided rich insights and valuable considerations pertaining to the requirements outlined in the Act." There is reference to Canada's Environmental Justice and Racism Symposium hosted by ECCC, and some details are provided on the needs and insights collected from consultations with Indigenous Peoples. What we want to see here instead is the government clearly explain what "input from engagement across a variety of activities and regions" means so that communities can understand how their perspectives are shaping government action. In the section about "Engagements with Indigenous Communities," the government clearly lays out some common findings from their consultations. The same must be done for the Symposium, including a summary of the insights that came out of this 2-day event, and what was particularly relevant to participating communities.

The federal government is eager to share the "What We Heard" reports from ECCC's community consultations conducted during the 2-year study period, which can be accessed on enviroequity.ca. These reports detail the specific needs of impacted communities and how the federal government proposes to address their recommendations. The feedback received provided valuable insights and actionable steps to advance environmental justice and to assess, prevent and address environmental racism – as outlined in the Act. These "What We Heard" reports are written in plain language and shared through multiple, accessible channels (e.g. TV, podcasts, print, radio, newsletters, and posters in community centres). The "What We Heard" reports are available in English, French, Tagalog, Punjabi, Hindi, Urdu, Mandarin, Cantonese, Arabic, and Somali. If there is a language that you would like resources made available in, you can email EJ-JE@ec.gc.ca.

Forward considerations

Feedback on the Current Draft

ECCC states how “this Strategy represents a starting point to continued dialogue and relationship building in advancing Environmental Justice” and how “ongoing efforts to strengthen engagement and consultation practices will be important.” The government fails to acknowledge that they are mandated to report on their progress on advancing the Strategy every five years. The 5-year gap to report on the Strategy is insufficient, and directly contradicts ECCC's statement that “ongoing efforts to strengthen engagement and consultation practices will be important.” The government must operate on a more frequent reporting timeline, as they must be responsive to ongoing input from impacted communities. Annual accountability reporting would allow the federal government to build trust with the public, and employ immediate corrections to policies and practices as community concerns arise and research advances.

ECCC describes how there needs to be improvements to consultation processes to make it easier for communities to be included. It is also described how this effort goes beyond the scope of the Strategy and requires a whole-of-government approach. However, there are no concrete commitments in the Strategy for how the federal government will actually improve the accessibility of the consultation process. To implement a “whole-of-government approach,” the Strategy must implicate other federal departments responsible for advancing accessible community consultations.

There is also no acknowledgement of how the federal government has historically failed in upholding its legal obligation to meaningfully consult Indigenous Peoples on environmental decision-making and policy.[3] Failure to acknowledge these shortcomings will only keep the government on the same path of inadequately and inaccessibly consulting Indigenous communities.[4] As the federal government continues to minimize the importance of community consultations in other policies, including decision-making on major-projects, it is difficult to trust that the government will actually implement the actions necessary to collect and prioritize community perspectives.

[3] Crown-Indigenous Relations and Northern Affairs Canada. Government of Canada and the duty to consult. Government of Canada. 2012. Updated August 05 2025. Accessed July 14 2026. www.rcaanc-cirnac.gc.ca/eng/1331832510888/1609421255810

[4] Kebaowek First Nation v. Canadian Nuclear Laboratories. 2025 FC 319. Federal Court of Canada. Published February 19 2025. Accessed on July 04 2026. canlii.ca/t/k9l24

Our Dream Strategy

This Strategy represents a starting point to ongoing dialogue and relationship building with Indigenous and racially-minoritized communities impacted by environmental racism. To ensure accountability, transparency, and regular monitoring of the effectiveness of the Strategy implementation, Environment and Climate Change Canada will release annual accountability reports. These annual accountability reports will keep track of the federal government’s progress toward rectifying long-term and cumulative environmental racism. They will also include insights and outcomes from ongoing, sincere consultations with impacted communities, and other accountability bodies to be established as a part of the Strategy.

This annual accountability report will be released in plain language and in the same set of languages noted above, to engage and inform a diverse array of Canadian communities. For additional language requests, email EJ-JE@ec.gc.ca. Environment and Climate Change Canada will implement multi-faceted communications methods in order to promote key findings and community recommendations contained within this report, including TV, radio, print, and social media ads. We also welcome partnerships with community-serving organizations who wish to help increase outreach to help reach those most affected with this information.

The Strategy affirms the federal government will honour its legal obligation to form meaningful consultations with Indigenous Peoples based on trust-based relationships built steadily over time. The rights, sovereignty, self-determination, laws, knowledges, and cultural continuity of Indigenous Peoples are respected, and will continue to inform the Strategy through an ongoing relationship of honest and transparent dialogue. The federal government will uphold a relational process with Indigenous governments to co-design actions and solutions laid out in the Strategy, and ensure there is shared decision-making power. The federal government is committed to forming sincere relationships with communities affected by environmental racism to rectify long-standing harms and avoid perpetuating other systemic and environmental injustices. To achieve this, Environment and Climate Change Canada, Impact Assessment Agency of Canada, Health Canada, and Crown-Indigenous Relations and Northern Affairs Canada will work in partnership with community organizations who are trusted and have successfully conducted meaningful community consultations to ensure all engagements with Indigenous Peoples and racially-minoritized communities are culturally-conscious and equitable. To ensure community accountability that the federal government upholds this commitment, the consultation process overseen by this intergovernmental partnership will be reviewed by the Environmental Justice Advisory Board described above.

Environmental racism

Feedback on the Current Draft

The Strategy states how environmental racism "has been linked to the disproportionate placement of environmentally hazardous sites (e.g., polluting industries) in or near Indigenous, racialized or marginalized communities." This definition of environmental racism, and what it is linked to, is too narrow. A large body of literature presents a broader, structural scope of what environmental racism is linked to, including: ongoing settler-colonialism, structural racism, racial capitalism, xenophobia, patriarchy, epistemic injustice, as well as racist environmental decision-making and planning.[5, 6, 7, 8] The government's definition must also acknowledge the intergenerational trauma and cumulative harms of these interconnecting injustices.

[5] Waldron IRG. There's Something In The Water: Environmental Racism in Indigenous & Black Communities. Fernwood Publishing. Published April 02 2018. Accessed July 21 2026. fernwoodpublishing.ca/book/there8217s-something-in-the-water

[6] Jacobs, B. Environmental Racism on Indigenous Lands and Territories. I-Portal: Indigenous Studies Portal. Published May 20 2010. Accessed July 21 2026. iportal.usask.ca/record/28145

[7] Canadian Human Rights Commission. Fast Talk on environmental racism in Canada. Canadian Human Rights Commission. April 22 2024. Accessed July 18 2026. www.chrc-ccdp.gc.ca/resources/publications/fast-talk-environmental-racism-canada

[8] Yarbrough, C., Smith-Colin, J. Infrastructure (in)Justice: A multi-scalar framework and review of epistemic, restorative, and reparative justice dimensions. Transport Reviews. 46(3), 462–486. Published November 18 2025. Accessed on July 03 2026.

Our Dream Strategy

Environmental racism is the disproportionate exposure of racially-minoritized communities to toxic industries, waste, environmental hazards, and climate impacts, alongside inadequate environmental protections, unsuitable housing, and poor infrastructures as a result of racist policies and practices. Often, environmental racism is experienced by racialized communities as compounded with intersecting social, economic, political, and health disparities which manifest intergenerational and cumulative effects that harm community wellbeing.

The impacts of ongoing colonialism, the reverberating legacy of slavery in Canada, dehumanization, and persisting trauma from racism continue to disadvantage Black peoples in social structures (i.e, education, healthcare, employment) and spatially. This historical and ongoing trauma has disadvantaged Black peoples in systems, institutions, and practices for generations in Canada, leaving deep and persisting impacts on Black people's physical, emotional, mental, and spiritual wellbeing.

Environmental racism also affects racialized immigrant and newcomer communities across Canada, often as cumulative exposure that builds across all the spaces one spends time in, including home and work. Where racialized communities live and work has been shaped by long-standing systems including discriminatory housing and lending practices, exclusion from well-resourced neighbourhoods, and planning decisions that routed highways, industry, ports, and rail through areas where racialized and lower-income communities were concentrated.[10] Racialized immigrants are overrepresented in higher-exposure work in agriculture, warehousing, manufacturing, construction, and care work, where they face greater exposure to heat, chemicals, and air pollution, often with the least power to demand protections. Racialized women are disproportionately affected because environmental risk intersects with caregiving responsibilities, low-wage and high-exposure work, and unpaid domestic labour.

Continued on next page

Feedback on the Current Draft

To directly quote from the Strategy, “the impacts of environmental racism can include socio-economic, health, general wellbeing, culture and more.” This sentence is vague and underdeveloped. While it lists categories of what the federal government considers to be impacts of environmental racism, it fails to provide any clear reasoning or evidence for why these impacts happen and how they intersect. This sentence must be replaced with a clearer explanation of the underlying drivers and compounding inequities of environmental racism. Furthermore, the Strategy should explicitly investigate how exclusion from environmental governance structures reinforces disparate exposures.[9] Further, the Strategy states: “because environmental racism is systemic; EJ considers how overlapping forms of oppression compound harm.” This is an overly simplistic way of describing the underlying, intersecting structural inequities that perpetuate or are compounded by environmental racism.

[9] Waldron, IRG. Environmental Racism and Climate Change: Determinants of Health in Mi’kmaw and African Nova Scotian Communities. Canadian Climate Institute. Published July 22 2021. Accessed on July 20 2026. climateinstitute.ca/publications/environmental-racism-and-climate-change

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Further, ongoing settler-colonialism disrupts Indigenous Peoples’ deep relationships and kinship with their own lands and waters, impeding their engagement in the land-based traditions that sustain their mental, physical, emotional, and spiritual wellbeing.

Racially-minoritized and historically marginalized groups in Canada are subject to repeat and compounding exposures to harm because of the structural forces of settler-colonialism and racism. The federal government commits to addressing the legacy and ongoing effects of these interconnected systems of oppression to adequately prevent environmental racism and promote the holistic wellbeing of Indigenous, racially and ethnically-minoritized groups in Canada. To do this, the Government of Canada will establish a National Environmental Justice Secretariat, which is a federal research agency dedicated to researching and monitoring environmental health inequities, cumulative effects, and intersectional and intergenerational impacts. To meet the Act’s requirement to examine the link between race, socioeconomic status and environmental risk, this Secretariat will examine how gender, Indigeneity, race, ethnicity, immigration status, disability, and income and other factors intersect to create differential and cumulative environmental health risks. The federal government will respect the rights of Indigenous Peoples by upholding their complete data sovereignty and governance, in accordance with UNDRIP. All impacted communities will have full ownership of their own health data and biomonitoring and will have sovereignty over how their data is used and shared.

[10] Huschka, A., Hirji, A., Devoe, M., Patterson, M., Bhalla, M. Policy Brief: Feedback on the National Environmental Justice Strategy Foundations. Shake Up The Establishment. December 11 2025. Accessed July 20 2026. shakeuptheestab.org/wp-content/uploads/2025/12/SUTE-NEJ-Fall-2025-Survey-Responses.pdf

Feedback on the Current Draft

In defining environmental justice, it is stated that "EJ promotes fair and meaningful inclusion in environmental decision-making and equitable distribution of benefits and burdens." This definition of environmental justice is inadequate and must be framed through an anti-colonial and intersectional lens. Further, there are no acceptable amount of environmental burdens that should be "equitably distributed" in Canada, and no individual or group can decide this for others.

The Strategy indicates how "EJ has long been advanced by grassroots organizations." The Strategy also mentions how "the federal government has responsibilities within [environmental justice]," but that progress towards this is "often led at the local and grassroots level." Impacted communities have had no other choice but to catalyze grassroots advocacy for decades because the federal government has failed to adequately redress the disproportionate environmental harm and intersecting systemic inequities it has perpetuated as a settler-colonial state. As they work to advance environmental justice, the federal government must integrate a respectful acknowledgement of the origins of the environmental justice movement. Furthermore, the passage of Bill C-226 into law was only made possible because of the steadfast grassroots efforts of civil society organizations – namely the ENRICH project – and coalitions like the CCECJ.[11]

[11] McMaster University. Bill developed and championed by HOPE Chair in Peace and Health Ingrid Waldron to become Canada's first environmental justice law. McMaster News. Published June 14 2024. Accessed July 30 2026. news.mcmaster.ca/bill-developed-and-championed-by-hope-chair-in-peace-and-health-ingrid-waldron-to-become-canadas-first-environmental-justice-law/

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Environmental justice refers to all how communities deserve to have equitable access to a clean, healthy, and sustainable environment, and that those most affected by environmental hazards and climate impacts can shape the policies, programs, and decisions that directly influence their wellbeing. This also means ensuring no one is denied environmental benefits because of their race, ethnicity, income, class, gender, disability status, migration status, or where they live. In Canada, environmental burdens and benefits are unequally distributed due to intersecting systems of oppression, including settler colonialism, racial capitalism and other structural inequities. Environment and Climate Change Canada recognizes these systemic drivers and is committed to preventing, reducing and ultimately eliminating the disproportionate environmental and health impacts experienced by Indigenous, racially and ethnically-minoritized communities, immigrants and newcomers, low-income communities, women and gender-diverse people and other structurally marginalized groups.

Environmental justice also means affirming the leadership, knowledges and lived experiences of the communities who have long protected lands and waters while being excluded from environmental governance. Environment and Climate Change Canada commits to implementing an anti-colonial and intersectional approach that identifies how multiple forms of oppression overlap and compound environmental harm, and that works intentionally to dismantle these barriers.

The Government of Canada recognizes the historical and ongoing grassroots advocacy of communities who have unjustly endured the impacts of environmental racism. When robust governmental policies were absent, it was the collective action of racially-minoritized peoples that catalyzed the environmental justice movement to abolish environmental disparities and advocate for the wellbeing of their equity-denied communities.

In recognition of the long-standing leadership, resistance, and advocacy of Indigenous, racially and ethnically-minoritized civil society groups and individuals, Environment and Climate Change Canada will establish the 'Environmental Justice Action Database' documenting historical and ongoing environmental justice grassroots efforts in Canada. Members of the Environmental Justice and Racism Team at Environment and Climate Change Canada will work in partnership with academic, grassroots, and civil society collaborators to populate the database. This will be a living database centred around storytelling, to record the collective actions of the organizations and communities that were foundational to the environmental justice movement in Canada. The Environmental Justice Movement Database is set to be up and running on enviroequity.ca by September 2027. Environment and Climate Change Canada also pledges to fund ongoing and emergent community-led environmental justice efforts through the Environmental Damages Fund, and other appropriate avenues for funding this initiative.

Feedback on the Current Draft

The Strategy defines environmental justice through the following 4 principles: procedural justice, recognitional justice, distributive justice, and restorative justice. There are 5 principles of environmental justice. “Epistemic Justice” is missing from the Strategy. When the knowledge of impacted communities is ignored, environmental strategies and policies can miss critical information and fail to address the root causes of marginalization.[12]

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Epistemic justice means redefining who is considered an expert through the prioritization of Indigenous, local, and cultural knowledges and worldviews in research, policy, and practices. This includes respecting the knowledge, experiences, and ways of understanding of the people and communities most affected by environmental harms, and including them in decision-making processes.

[12] Huschka, A., Hirji, A., Devoe, M., Patterson, M., Bhalla, M. Policy Brief: Feedback on the National Environmental Justice Strategy Foundations. Shake Up The Establishment. December 11 2025. Accessed July 20 2026. shakeuptheestab.org/wp-content/uploads/2025/12/SUTE-NEJ-Fall-2025-Survey-Responses.pdf

Feedback on the Current Draft

The Strategy acknowledges how "restorative justice" is a principle of EJ, and includes it as a component of what should define environmental justice. It is also mentioned how restorative justice involves "taking responsibility for environmental harms and risks." The principle of restorative justice must be better integrated throughout the entire Strategy, and ECCC must provide actionable steps for how they plan to advance it. The federal government must go beyond acknowledgment and implement concrete accountability measures, including issuing fines to corporations and reparations for affected communities. The federal government must be held accountable to repairing the long-standing harm inflicted on impacted communities, and ground this restorative justice in care and healing.[13, 14]

[13] Huschka, A., Allen, K., Milligan, A., Bhalla, M. Community Feedback on Environmental Racism and Environmental Justice Collected at Toronto Climate Week. Shake Up The Establishment. July 01 2026. Accessed July 20 2026. shakeuptheestab.org/nej-toronto-feedback

[14] Yarbrough, C., Smith-Colin, J. Infrastructure (in)Justice: A multi-scalar framework and review of epistemic, restorative, and reparative justice dimensions. Transport Reviews. 46(3), 462–486. Published November 18 2025. Accessed on July 03 2026. doi.org/10.1080/01441647.2025.2585037

Our Dream Strategy

Environment and Climate Change Canada acknowledges how racist policies and practices have historically and continue to perpetuate environmental racism and takes responsibility for these actions, which have unjustly harmed Indigenous and racially-minoritized communities across Canada. The Government of Canada is committed to repairing long-standing harm by engaging in deep relationship building grounded in trust, accountability, equitable representation in decision making, and healing. Environment and Climate Change Canada will work diligently to prevent any further harm to be inflicted upon communities, and will also work alongside impacted communities to help build their capacity to recover and thrive for generations to come. To move forward with affected communities on the path towards holistic wellness, Environment and Climate Change Canada will address and dismantle the legacy and ongoing structural inequities that underlie environmental racism, and hold itself accountable to develop just social, environmental, economic, and health policies and infrastructures.

To act on restorative justice, Environment and Climate Change Canada commits to issuing penalties and fines to the high-polluting industries and corporations whose unjust actions have wrongfully harmed impacted communities. All funds collected from these fines will be deposited into the Environmental Damages Fund and be invested into remediation efforts that support impacted communities. Beyond this, the funds will also be used to help restore any natural and/or built-environments that were degraded, by supporting projects to create green spaces, community gardens, re-build infrastructures with safe building materials, and to support any other needs identified by impacted communities.

To meet the timeliness of the needs of communities, Environment and Climate Change Canada will open a new cycle of funding through the Environmental Damages Fund before the end of 2026. Environment and Climate Change Canada will reopen this funding on a yearly basis to support communities in their recovery from environmental hazards. This funding will go towards projects to:

- Compensate communities for the environmental harms they have endured
- Initiate community-informed action to remediate existing environmental hazards
- Set up recovery and/or healing centres in impacted communities
- Invest in communities' economic recovery from local business or tourism impacts of environmental hazards. These funds will not be eligible for use by corporations to expand harmful or polluting activities.

Environment and Climate Change Canada is also committed to engaging in frequent communications throughout remediation efforts to ensure communities are aware of and can inform the actions being taken (e.g. social media, print, TV, radio, townhall meetings, etc.). Environment and Climate Change Canada will ensure that there are dedicated funds set aside in their yearly budget to adjust programming to address emergent needs brought up by community members through these engagement processes.

Beyond supporting opportunities through the Environmental Damages Fund, Environment and Climate Change Canada will establish a dedicated community outreach team, staffed by personnel with diverse lived experiences, compensated fairly as determined by a third party arbitrator, and guaranteed multi-year funding to carry out programming. These staff will be focused on communicating and supporting remediations and reparations. To ensure that the communications between these staff and community members result in timely responses that meet the pressing needs of communities, Environment and Climate Change Canada is committed to maintaining a maximum 6 month timeline from complaint to action. Environment and Climate Change Canada is committed to having this team operational within 1 year of Strategy publication.

Part 3: National Strategy Respecting Environmental Racism and Environmental Justice 2026-2031

Vision

Feedback on the Current Draft

In the Strategy, the government envisions everyone having “equal access to healthy, safe and more secure environments.” The government must be more consistent in how they aspire to shape healthy futures and environments for communities. For example, in the Implementation framework for the Right to a Healthy Environment under the Canadian Environmental Protection Act, ECCC established that a healthy environment is one that is “clean, healthy, and sustainable.”[15]

Our Dream Strategy

The vision for the Strategy is “to advance environmental justice by ensuring that all communities in Canada have equal access to environmental benefits”, and that impacted communities no longer bear disproportionate exposure to environmental hazards. This means ensuring that every individual in Canada has access to clean, healthy, and sustainable environments. Environment and Climate Change Canada is committed to making community consultations more frequent and accessible, to ensure that the needs and knowledges of communities can guide us in executing this vision.

[15] Environment and Climate Change Canada. Implementation framework for the right to a healthy environment under the Canadian Environmental Protection Act, 1999. Government of Canada. Modified July 18 2025. Accessed July 15 2026. www.canada.ca/en/environment-climate-change/services/canadian-environmental-protection-act-registry/publications/right-healthy-environment-implementation-framework.html#s2

Feedback on the Current Draft

Before listing the four guiding principles, the government reflects on actions being developed with rights holders so measures "achieve the objectives of UNDRIP [and] other key international frameworks like the United Nations Convention on the Rights of Persons with Disabilities." While the government references critical international frameworks, each with their own set of action items that can be used to better inform the development of guiding principles, the government **must** clearly explain how these frameworks will inform their action on environmental racism and injustice.

Our Dream Strategy

Alongside the guiding principles identified below, Environment and Climate Change Canada will turn to the Articles identified within the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), and the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), to ensure that the communities implicated within these frameworks have agency in decision-making processes to prevent and address environmental racism and advance environmental justice.

Priority Articles from UNDRIP implicated in the Strategy include:

- Article 29, 1. Indigenous peoples have the right to the conservation and protection of the environment and the productive capacity of their lands or territories and resources. States shall establish and implement assistance programmes for Indigenous peoples for such conservation and protection, without discrimination.
- Article 29, 2. States shall take effective measures to ensure that no storage or disposal of hazardous materials shall take place in the lands or territories of Indigenous peoples without their free, prior and informed consent.
- Article 29, 3. States shall also take effective measures to ensure, as needed, that programmes for monitoring, maintaining and restoring the health of Indigenous peoples, as developed and implemented by the peoples affected by such materials, are duly implemented.
- Article 32, 1. Indigenous peoples shall have the right to determine and develop priorities and strategies for the development or use of their lands or territories and other resources.
- Article 32, 2. States shall consult and cooperate in good faith with the Indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water, or other resources.
- Article 32, 3. States shall provide effective mechanisms for just and fair redress for any such activities, and appropriate measures shall be taken to mitigate adverse environmental, economic, social, cultural, or spiritual impact.

Priority Articles from UNCRPD implicated in the Strategy include:

- Article 4, 3. In the development and implementation of legislation and policies to implement the present Convention, and in other decision-making processes concerning issues relating to persons with disabilities, State Parties shall closely consult with and actively involve persons with disabilities, including children with disabilities, through their representative organizations
- Article 21, a. Providing information intended for the general public to persons with disabilities in accessible formats and technologies appropriate to different kinds of disabilities in a timely manner and without additional cost
- Article 21, b. Accepting and facilitating the use of sign languages, Braille, augmentative and alternative communication, and all other accessible means, modes, and formats of communication of their choice by persons with disabilities in official interactions

Feedback on the Current Draft

In their explanation of “protecting the environment in environmentally hazardous areas”, the government recognizes that they need to prioritize “preventing environmental damage and strengthening ecological safety for affected communities.” This commitment is difficult to reconcile with the fact that the federal government — in collaboration with provincial governments — continues to fund and advance high polluting projects like pipelines[16] and mines through the Major Projects Office.[17]

Further, the government acknowledges that “environmental protection should be guided by best-available science and Indigenous Knowledge Systems.” Conceptually, this is incredibly close to Etuaptmumk (Two-Eyed Seeing), which was developed by Mi’kmaq Elder Albert Marshall.[18] To truly advance environmental justice, the government must better consider Indigenous knowledges throughout the development and implementation of the Strategy.

[16] Prime Minister of Canada. Canada and Alberta to advance west coast pipeline project proposal and Pathways Carbon Capture Initiative - to build a stronger, more resilient Canada. Government of Canada. Published July 2 2025. Accessed July 15 2026. www.pm.gc.ca/en/news/news-releases/2026/07/02/canada-and-alberta-advance-west-coast-pipeline-project-proposal-and

[17] Major Projects Office. Projects referred to the MPO. Government of Canada. Modified July 13 2026. Accessed July 15 2026. www.canada.ca/en/privy-council/major-projects-office/projects/national.html

[18] Bartlett, C, Marshall, M, & Marshall, A. Two-Eyed Seeing and other lessons learned within a co-learning journey of bringing together indigenous and mainstream knowledges and ways of knowing. J. Environ. Sci. 2012;2:331-340. doi.org/10.1007/s13412-012-0086-8

Our Dream Strategy

Upholding the principle of protecting the environment in environmentally hazardous areas includes ensuring that federal funding does not support the development of high emitting and polluting industries and facilities, including oil and gas. To achieve this goal, the Government of Canada commits to the divestment of federal funds from oil, gas, and liquid natural gas (LNG) by 2040. Environment and Climate Change Canada will also expand the scope of the Environmental Damages Fund so that all excess revenue from new and remaining oil and gas facilities will fund community-led environmental justice research and programming.

Environmental protection will be guided by the principle of Etuaptmuk (Two-Eyed Seeing), as developed by Mi’kmaq Elder Albert Marshall, by which Indigenous knowledge keepers and western science experts will be continuously consulted to ensure any actions stemming from the Strategy meet the needs of impacted communities and ecosystems. The government respects the distinct knowledges of Indigenous Peoples across Canada and is committed to incorporating their expertise into the co-design of the Strategy's actions and solutions through meaningful Indigenous partnerships.

Acknowledging lived experiences and realities, and respecting differences

Feedback on the Current Draft

The government acknowledges the need for more work to learn about "how environmental pollution makes existing inequalities worse." Instead, the government must address how historical and pre-existing inequities have caused communities to be disproportionately exposed to environmental hazards.

Further, the government recognizes that "Indigenous, racialized, and other marginalized communities, and those whose livelihoods depend on natural resources" should receive "particular attention" as a part of the Strategy. However, the government must specifically include gendered environmental exposures, and differentiate how different racially and ethnically-minoritized communities, including racialized immigrants and newcomers, are being exposed to environmental hazards.

Finally, this section of the Strategy is the first to reference communities "whose livelihoods depend on natural resources." We agree that these perspectives are important for addressing environmental injustices. However, the government cannot justify the continued operation of these harmful facilities based solely on the economic benefits they provide, as they simultaneously jeopardize both environmental and human health.

Our Dream Strategy

Environment and Climate Change Canada recognizes that Indigenous people, racially and ethnically-minoritized people, racialized newcomers and immigrants, particularly if they are low-income, have been subject to the disproportionate placement of high-polluting facilities in their neighbourhoods, unsafe building materials, overrepresentation in high-risk jobs, and underrepresentation in decision-making processes and have had less access to environmental benefits and policy processes. Environment and Climate Change Canada also recognizes the role that gender plays in exposure to environmental harms, including through cosmetics and personal care products targeted to women and gender diverse folks, and workplace exposures that disproportionately affect racialized women, adding to their body burden.

Environment and Climate Change Canada is committed to applying an intersectional lens across our actions to advance environmental justice, to understand how compounding socioeconomic factors contribute to one's exposure risk to environmental hazards. Environment and Climate Change Canada commits to establishing further opportunities to highlight the localized experiences of impacted communities, including by funding community-led research and biomonitoring activities, and establishing effective communications platforms (including social media posts, written resources, and public townhalls) to better circulate this information.

Communities whose livelihoods depend on natural resources will also be involved throughout the implementation of the Strategy. Environment and Climate Change Canada commits to prioritizing the environmental and community health impacts of natural resource projects, and will work with Employment and Social Development Canada to provide financial and social service supports including grants and re-training programs for workers whose livelihoods are impacted by the measures included in the Strategy.

Encouraging environmental education

Feedback on the Current Draft

The government identifies that “timely, accurate, and relevant information is essential for informed decision-making,” as well as the importance of “access to information” for impacted communities. This description is overly vague and lacks distinction about what kind of information will be of focus, and what specific actions the government will take to ensure that access to information is “timely, accurate, and relevant” to communities.

As demonstrated by the Strategy, communications from the government are vague and jargon-filled, which makes it difficult for impacted communities to understand how they are being affected by high emitting and polluting industries, and how they can hold their governments accountable to address them.[19]

Our Dream Strategy

Environment and Climate Change Canada will ensure that communities have access to environmental health data, including the location of environmental hazards and the health harms they create. To meet this commitment, Environment and Climate Change Canada will circulate environmental health information across multiple platforms including television, radio, social media, and mailed informative flyers to community members' homes.

Written and virtual communications will be made available in the same set of languages noted above. For additional language requests, email EJ-JE@ec.gc.ca.

Building meaningful relationships and ensuring inclusive participation

As their core focus for establishing meaningful relationships and inclusive participation, the Government of Canada admits that they need to do more work on “identifying and removing barriers to participation.” There are plenty of reports by community-serving organizations that highlight the barriers communities face when trying to access decision-making processes. The government can already start implementing action on these barriers, while continuing conversations with participants to address emergent needs. Across previous community consultations facilitated by Shake Up The Establishment, Finance Engage Sustain, and the Women’s Healthy Environments Network, participants highlighted location, compensation, and language as potential barriers to participation.[19]

The government will implement the following initiatives to increase the accessibility of consultations and policy processes for impacted communities:

- The government will prioritize conducting in-person consultations in communities where internet access is unreliable or unavailable. Environment and Climate Change Canada will work with local governments and trusted community organizations to identify local gathering spaces, to ensure that consultations are held in popular, accessible locations.
- To meet the needs of community members that cannot access an in-person event, Environment and Climate Change Canada will also provide virtual consultation opportunities, including meetings, surveys, and public portals on enviroequity.ca
- To support participants in both in-person and virtual community engagements, Environment and Climate Change Canada will offer financial compensation for missed work, alongside transportation and childcare coverage, technological equipment, and food/beverage coverage. This coverage will be provided through our Community Consultation Accessibility Fund, to be established as a part of the 2026 federal budget.

To ensure that these actions meet the present and future needs of communities, the government will engage in continuous conversations with participants and make adjustments to our approach based on their feedback. Environment and Climate Change Canada will provide multi-year funding to community-serving organizations to support in the execution of the above commitments.

[19] Huschka, A, Devoe, M, Bhalla, M, Seaifan, Z. Community-based Feedback on the Right to a Healthy Environment under the Canadian Environmental Protection Act. Shake Up The Establishment. P. 50-51. Published March 7 2025. Accessed July 16 2026. shakeuptheestab.org/wp-content/uploads/2025/03/RTHE-Community-Feedback-Report.pdf

Feedback on the Current Draft

As currently laid out in the Strategy, Priority Area 1 lacks specificity as to how the government will go about "integrating EJ and intersectionality into decision-making" by failing to lay out any financial, programming, or timeline commitments. As mandated in the *National Strategy respecting Environmental Racism and Environmental Justice Act*, the Strategy must include "measures that can be taken to advance environmental justice and assess, prevent, and address environmental racism." Throughout the current draft, there is no mention of measurable targets, timelines, or legislative amendments. Failure to include assessment criteria for the efficacy of actions taken (or not) not only violates the legislation, it prevents impacted communities from holding decision-makers accountable to actions on environmental racism and justice.

"Potential priority actions" listed to advance this priority action include tasks that should have been implemented prior to Strategy development (i.e. "task a dedicated federal team to lead Canada's efforts to advance EJ," and "identify opportunities to reflect EJ as a priority across federal policies, frameworks, or strategies.")

Our Dream Strategy

In order to address environmental justice concerns across federal policies, programs, and priorities, environmental justice and intersectionality will be integrated across federal decision-making. Environment and Climate Change Canada will develop an environmental justice decision-making tool, akin to Gender-Based Analysis (GBA) Plus, with a highlighted focus on the intersectional, compounding impacts that communities experience across the federal jurisdiction. To support the implementation of this tool, Environment and Climate Change Canada will also establish a training course in partnership with non-governmental environmental justice organizations, and diverse community leaders, knowledge holders, and experts. This course must be completed by all federal government employees by **January 2028.**

Priority Area 2: Collaboration and Coordination

Feedback on the Current Draft

The federal government has identified that "ER is a complex, systemic, and shaped by overlapping challenges. Many of these issues fall outside federal jurisdiction." The government also emphasizes that "environmental protection in Canada is a shared responsibility across all levels of government, through legislation, regulation, policy, planning, and resource management" later in the Roles and Responsibilities section of the Strategy. Beyond the grammatical errors, the federal government fails to specify which ER issues are under jurisdiction of which governments. The federal government must outline a plan detailing how all levels of government will collaborate to advance environmental justice and prevent and address environmental racism in communities across the country. The provinces and territories do not presently have their own individual environmental justice legislation, so the federal government must use the Strategy to clearly lay out these collaborations. Failure to do so will ultimately leave a lack of clarity for communities about which government(s) they should be reaching out to in order to address the environmental racism they are experiencing. It is unfair to expect communities to take on the additional mental labour of navigating jurisdictional intricacies of addressing environmental injustices.

Potential priority actions identified by the government for collaboration and coordination include to "establish a mechanism/ platform to share consolidated information with affected communities" and to "identify opportunities to work with granting agencies and federal funding initiatives to address gaps in research, knowledge, and resources". As identified in other sections of our submission, these "actions" lack actual information about their implementation, including responsible federal bodies, financial commitments, or timelines. Without this key information, communities have no mechanisms for holding the federal government accountable on environmental racism issues, which feeds back into public distrust in the federal government. In Q4 of 2024, less than 30% of the public was reporting high confidence in the federal government.[20] Non-committal statements on systemic, life-impacting issues will not improve these trust levels.

[20] Statistics Canada. Confidence in institutions. Government of Canada. Updated October 29 2025. Accessed July 20 2026. www.statcan.gc.ca/hub-carrefour/quality-life-qualite-vie/good-governance-saine-gouvernance/institutions-eng.htm

Our Dream Strategy

Environmental racism is a complex, systemic issue that is deeply ingrained in Canadian institutions, industries, and decision-making processes. Addressing all aspects and instances of environmental racism requires the collaboration of all levels of government to approach this injustice as their jurisdiction allows. The Government of Canada is committed to collaborating with Indigenous governments, environmental departments of the provinces and territories, and relevant municipal governments to ensure that we are taking an intergovernmental approach to address environmental racism across the country. Environment and Climate Change Canada commits to convening quarterly intergovernmental environmental justice meetings to facilitate a cohesive approach across different levels of government.

In recognition of the intricacies of jurisdiction for environmental issues, the federal government is dedicating staff to support community members in reaching the responsible body across all levels of government. These staff members will be responsible for triaging community members to the correct remediation process, reporting tool, or decision-making body to address their environmental justice concern(s). If there is an environmental justice or environmental racism issue that you and your community need government support to address, you can email EJ-JE@ec.gc.ca for more information. Staff will be required to respond to all emails with tangible, informative next steps, within 3 weeks of receival.

To further advance coordination and collaboration across the federal government, Environment and Climate Change Canada is committed to:

- Collaborating with Natural Resources Canada and Health Canada to establish a national database on enviroequity.ca, which will house key information about the location of high-polluting facilities and other environmental hazards, the environmental and public health impacts they may be causing, and their proximity to communities. If you have any questions about the information presented in the database, or requests for information to be added, you will be able to reach federal government staff at EJ-JE.ec.gc.ca
- Collaborating with the Department of Finance, the Canadian Institutes of Health Research, National Research Council of Canada, and National Sciences and Engineering Research Canada to identify funding and grant opportunities to support community-led research and biomonitoring programs so that impacted communities can have direct agency over their environmental health outcomes and data sovereignty.

Priority Area 3: Community Participation

Feedback on the Current Draft

Priority Area 3 was identified to be "enhancing impacted communities' participation in federal environmental policy and decision-making." ECCC must explicitly identify which communities will be prioritized or served as a part of this priority area. Throughout the rest of the Strategy, the focus is on Indigenous communities, racialized communities, and low-income communities. The government must ensure that they take actions to "enhance … participation in federal environmental policy and decision-making" for women and gender-diverse folks, newcomers and immigrants, disabled people and more, as well as addressing how the intersections of socioeconomic factors further inhibit one's ability to contribute. For example, racialized newcomer and immigrant communities are exposed to substantial amounts of environmental hazards and pollution, and more likely to live near major roadways and industrial areas in urban cities.[21] However, they face systemic barriers to decision-making processes, including cultivated fear about how their immigration or resident status could be impacted by their participation, and language barriers.[22]

As a part of advancing Priority Action 3, the government lists that they plan to "support enhanced ways to track and communicate: information about engagement opportunities, how input was incorporated, and data related to representation, outcomes and participation." The government must be more specific about how they plan to support tracking and communicating efforts. Without clarification about these processes, impacted communities will still be unaware of how they can access key information about their environmental health outcomes.

[21] Kershaw, S., Gower, S., Rinner, C., Campbell, M. Identifying inequitable exposure to toxic air pollution in racialized and lower income neighbourhoods to support pollution prevention. Geospatial Health. 2013; 7(2): 265-278. www.geospatialhealth.net/index.php/gh/article/view/85/85

[22] Huschka, A, Devoe, M, Bhalla, M, Seaifan, Z. Community-based Feedback on the Right to a Healthy Environment under the Canadian Environmental Protection Act. Shake Up The Establishment. P. 51. Published March 7 2025. Accessed July 16 2026. shakeuptheestab.org/wp-content/uploads/2025/03/RTHE-Community-Feedback-Report.pdf

Our Dream Strategy

Environment and Climate Change Canada recognizes that the inaccessibility of policy and decision-making processes has perpetuated the occurrence of environmental injustices. When the voices of impacted communities go unheard, the government cannot serve its constituents. Environment and Climate Change Canada is committed to making engagement processes more accessible to Indigenous and racially and ethnically-minoritized communities, low-income people, women and gender diverse people, immigrants and newcomers, people with disabilities, youth, seniors, Northern, rural, remote communities, and more.

To advance this goal, Environment and Climate Change Canada is committed to working with trusted organizations that serve these communities, to foster community-led and guided engagement processes. This will include hiring community partners to lead webinars with government staff, facilitate community consultations, or support with translation services at government events. The government will engage community-serving groups in professional, paid partnerships or service contracts, in which they will receive living wage compensation for their organizational, facilitation, communications, and translation contributions. All participants in engagements co-led by the government and community partners will also receive financial compensation for their involvement. The government will publish a collaborative, public-facing community partnership report within 4 months of the completion of engagements, detailing the feedback received and the actions and responses from the federal government.This report will be circulated to all partners, participants, and the public through direct email outreach, follow-up engagements like townhalls, and print, social media, TV, and radio content.

Building off the list of sites identified as a part of the study, Environment and Climate Change Canada will be publishing a national mapped database on enviroequity.ca within 6 months of Strategy publication. This database will be a one-stop webpage where communities can access information about the location of environmental hazards (e.g pipelines, mines, factories, landfills, and other high polluting facilities), the environmental and human health impacts they may be causing, and their proximity to local communities and resources (e.g. rivers, lakes, and waterways). This will be a living database that will be updated by government staff as they learn more from the quarterly intergovernmental meetings and through engagements with impacted communities. To support the maintenance and upkeep of the database, Environment and Climate Change will establish a dedicated team of researchers and GIS experts, composed of personnel with diverse lived experiences and paid liveable wages. Should community members have more information they wish to see in the database, they can email EJ-JE.ec.gc.ca.

Environment and Climate Change Canada will ensure that community members are made aware of this database, and its subsequent updates, through a multi-platform, multi-lingual communications approach in partnership with community-serving organizations, including through mailed informational handouts to communities, engagement events like townhalls, and outreach at community centres to meet community members where they are at.

Priority Area 3: Community Participation

Feedback on the Current Draft

The government also proposes "the development of a federal framework on inclusive engagement" as an additional way to advance Priority Action 3. The government must be more specific about the timeline for the development of this framework. It is also vital that communities be thoroughly involved in the development of this framework, to ensure that any proposed actions actually address the barriers community members face to participating in decision-making processes. We recommend that the government consult community-serving organizations that have successfully conducted consultations to collect non-governmental perspectives as well.

The government proposes to "investigate coordinated departmental approaches to better identify potential impacts to Indigenous rights, and engage with impacted groups." There are plenty of reports that provide action items for the federal (and other levels of) government to advance reconciliation with Indigenous communities (i.e. UNDRIP, TRC Calls to Action, etc.). The government has failed to adequately implement these actions. Rather than expecting additional emotional labour from Indigenous communities, while they are simultaneously experiencing the impacts of these injustices, the federal government can address these already identified and community-backed action items to alleviate other systemic impacts of colonialism.

Our Dream Strategy

In order to enhance the participation of impacted communities in environmental decision-making processes, Environment and Climate Change Canada will be developing a federal framework on inclusive engagement on the following timeline:

Spring 2027: Consultations on the Draft Framework

Fall 2027: Publication of the Framework

January 2028: Framework will go into implementation

Throughout the development of the framework, Environment and Climate Change Canada will be meeting with impacted communities to identify key barriers and resources the government must address to make participation in environmental policy-making more accessible. Environment and Climate Change Canada will also be consulting with community-serving groups that have been previously contracted to facilitate consultations on environmental policies. Environment and Climate Change Canada will maintain this list, to be able to efficiently contract out consultations on issues in which government presence may inhibit community comfort to contribute.

To ensure that this framework continues to meet the evolving needs of communities and ecosystems across Canada, Environment and Climate Change Canada will conduct community consultations and update the framework accordingly every two years.

Environment and Climate Change Canada recognizes that there have been multiple reports compiled that identify what actions the federal government (and other levels of government) can take to advance reconciliation and address the systemic injustices being experienced by Indigenous peoples. The Government of Canada is committed to advancing the action items identified in UNDRIP and The TRC Calls to Action. The government will use these documents as a starting point to avoid recreating already completed work, and avoid placing an undue emotional burden on Indigenous communities as they simultaneously experience the impacts of the injustices this Strategy aims to address. The Government of Canada will engage in continuous engagement with Indigenous communities through consultations, virtual and in-person meetings, and an online portal to be made available on enviroequity.ca, to ensure that any actions continue to meet the needs of communities.

Feedback on the Current Draft

This entire section is remarkably vague, with no indication of what actual actions will be taken, who in the federal government will be responsible for implementing them, and on what timeline these commitments would be implemented.

Our Dream Strategy

Environment and Climate Change Canada recognizes that environmental conditions are always changing, and that the government will need to maintain flexibility in their approaches and actions to meet the emerging needs of communities and ecosystems across the country. As the government continues to build out their knowledge, tools, and skillset on environmental justice through the establishment of the database, quarterly intergovernmental meetings, and continuous community engagement, we will continue to update our legislative, policy, programming, communications and funding approaches to integrate missing perspectives, experiences, and knowledges. Any updates to our approach will be consulted upon by the Environmental Justice Advisory Board, and reported in our annual accountability report.

Feedback on the Current Draft

Alongside other levels of government, the federal government identifies “actors like industry” as potential collaborators for “facilitat[ing] accessible access to information and data.” Given how industry is a key perpetuator of the environmental injustices being experienced by communities, they should not have an influencing role in decision-making or information-sharing processes related to environmental justice policies. Industries should solely play a financial role in advancing environmental justice programming, through fines and reparations for the harms they are causing to communities and ecosystems across the country.

The government lists “some critical areas where Canada already has obligations or responsibilities that could contribute to advancing EJ principles,” particularly in other pieces of legislation and programming. Beyond simply listing these pieces, the government provides no information about how their obligations in these policies and programs will influence the Strategy’s implementation. The government must also provide more clarity on how the federal bodies and agencies responsible for these policies and programs will support the implementation of the Strategy.

Our Dream Strategy

Environment and Climate Change Canada is committed to prioritizing the perspectives and knowledges of communities and other levels of government, but we cannot undermine the role that industry must play in advancing environmental justice. Environment and Climate Change Canada recognizes that industry has perpetuated the historical and present environmental hazards that communities are experiencing, which has contributed to deep distrust between impacted communities and industries. In order to start addressing industry impacts, Environment and Climate Change Canada will establish an Environmental Reparations Fund in the 2027 federal budget, with funding made available within 4 months of fines being applied to a corporation. This fund will be built up by fines to high-polluting facilities for the environmental and public harms that they have and continue to cause. Environment and Climate Change Canada will collaborate with third-party arbitrators, scientific, Indigenous, and other experts to determine fine amounts that prioritize communities, not corporations. The monetary value of fines will be reported upon and reevaluated as a part of our annual reporting cycle. The money collected as a part of the Environmental Reparations Fund will be distributed back to impacted communities to fund community-led research, programming, education, and solutions to addressing environmental injustices. Environment and Climate Change Canada is committed to engaging with impacted communities through direct phone calls, emails, and mail outreach, online portals, and in-person and virtual engagement events to identify how these funds can best be allocated. Reports from these engagements, and decision-making logic for funding distribution will be included in our annual reporting.

To ensure that environmental justice priorities are addressed across federal policies and programs, the Environmental Justice and Racism Team at Environment and Climate Change Canada is committed to engaging in quarterly meetings with the teams responsible for the following programs, to collectively advance environmental justice across their work:

- "Responsibilities on federal Crown lands, where the federal government holds primary responsibility for the stewardship and environmental management, including First Nation reserve lands
- Federal Contaminated Sites Action Plan (FCSAP), where the Government of Canada identifies, assesses, and remediates contaminated sites, some of which are on or near Indigenous or racialized communities affected by long-term pollution
- a Right to a Healthy Environment under the Canadian Environmental Protection Act, 1999 (CEPA), which includes consideration of EJ in exercising federal authorities to take action related to managing toxic substances, protecting air and water quality and assessing environmental and health risks
- Canada’s Anti-Racism Strategy, which commits the federal government to addressing systemic racism across institutions, policies, and initiatives. This could include environmental decision-making by removing barriers and making systems more inclusive
- Longstanding commitments to intersectional analysis, through the application of Gender-Based Analysis Plus, to better understand the impacts of policies, programs and initiatives on diverse groups of people”

Feedback on the Current Draft

The government identifies that putting "*Canada's National Strategy Respecting Environmental Racism and Environmental Justice (2026-2031)* into motion requires a strategic and coordinated action plan." As laid out within the Strategy, this action plan will focus on "an enhanced federal role, ongoing collaborations with partners and communities, and leveraging the processes, tools, and opportunities available across the Government of Canada to drive impactful change." The government must clarify on what timeline we can expect the development of an action plan, including opportunities for communities to provide feedback. Considering that measures to advance environmental justice were mandated to be included in the Strategy itself, it is concerning that the federal government appears to be further delaying any actual action to address environmental racism and injustices across the country.

Our Dream Strategy

As we move forward to carrying out our commitments to advance environmental justice and address and prevent environmental racism, Environment and Climate Change Canada recognizes the critical coordinating and funding role we will play across community members, levels of government, and industry. Implementation of the actions and commitments throughout the Strategy will require the government to:

- establish and deepen trusted relationships with impacted communities and organizations that serve them
- fund reparations, remediations, research, and consultations, guided by community needs and knowledges
- enact regulatory and financial accountability measures for high-polluting industries

All of the government's actions will be shared with the public as a part of our annual accountability report, and through multi-faceted, multi-lingual communications including social media, print, TV, radio, and in-person and virtual engagement events. Successful implementation of the above Strategy will result in increased physical, mental, and spiritual health outcomes for communities, by decreasing disproportionate exposures to environmental harms, and equalizing access to environmental benefits and decision-making pathways. Environment and Climate Change Canada is committed to reporting their progress in implementing these actions, and continuously engaging with impacted communities to ensure that our commitments still meet the evolving needs of communities. We look forward to continued collaboration with impacted communities, community-serving groups, scientific, Indigenous, and community experts, to advance this Strategy to establish clean, healthy, and sustainable environments for all communities across Canada.

Part 2 and Annex A: The Study

The draft Strategy includes a study examining "the link between race, socio-economic status and environmental risk, and information and statistics relating to the location of environmental hazards," as required by the National Strategy Respecting Environmental Racism and Environmental Justice Act."[23] Within the Strategy, it is repeatedly emphasized that the study's goal was to develop a common methodology and baseline information that communities could use across the country for targeted analyses. However, the Strategy's description of the study is incredibly difficult to decipher and understand, as it is not written in a logical manner, is full of grammatical errors, and does not use plain language. The current formatting conceals the methods and findings in such a way that it is unclear what work was even done. Since our team could not re-design the study (or even fully understand it), the following section provides recommendations on reformatting Part 2 and Annex A to flow more logically, use accessible language, address study limitations, and commit to further community-centred research.

[23] House of Commons. Bill C-226. Parliament of Canada. Published June 20 2024. Accessed July 30 2026. https://www.parl.ca/DocumentViewer/en/44-1/bill/C-226/royal-assent

What is in the Strategy

Current outline:

- Introductory section
  - Why the study was conducted
  - Goals and rationale
  - Key definitions
  - Methodology vaguely described as "... standard statistical methods [used] to develop an approach that can be applied to different types of information."
- Results and lessons learned
  - Overly complicated descriptions of findings and results
  - Sections for lessons learned and further opportunities, including content that does not correspond with headings
- All information about methods and results from analyses are in Annex A

What is Missing

- Introductory information on the study and its methodology, including who conducted the study and when
- What specific statistical methods were used
- Clear, accessibly-worded findings and results of the study
- Relevant conclusions, and how and where the government envisions them being applied
- A section dedicated to clearly discussing study limitations
- Commitments to next steps and further research based on study findings and limitations

What We Recommend

Part 2 of the Strategy is **re-structured to the following outline:**

- Easy-to-understand **introduction** that provides basic context and background about the study:
  - Who, what, where, why, when, and how the study was conducted
  - Key definitions and background information
- Simple overview of the **methods** used, including:
  - Datasets used and experts consulted
  - Statistical methods applied
- Simple summary of **key findings and results:**
  - Description of where inequities were the highest
    - Relevant maps and figures included as needed
  - Challenges or lessons that researchers using the study's methodology can learn from
- Simple overview of conclusions and **how they will be used to inform policy action**
  - Includes a discussion of study limitations
  - Includes **clear commitments to next steps**
- Link to a complete, technical version of the study in Annex A or a separate document so that details can be accessed

Part 2 and Annex A: The Study

What is in the Strategy & What is Missing

There are several grammatical errors and formatting mistakes throughout the draft Strategy, with major issues in Part 2 specifically. For example:

- Content in the "representation in policy making" section formatted as a bullet-point list that should instead be formatted as a paragraph or flow chart given how it is worded (Additional analyses)
- The use of "industry/polluters" in a sentence (Additional analyses)
- Periods and commas outside closing quotation marks under "Table 2: Relative risk of hazards for communities with different spatial relationships" (Annex A)
- Extra spaces between sentences or words under "Considerations and lessons learned" and "Statistical analysis" (Annex A)
-

Part 2 states that the study "… will provide insights that can inform federal decision-making." The Government of Canada must provide clarity on **how** the results of the study will be used to inform decision-making, **who** will implement this evidence, and **when**.

The introduction to Part 2 states that the study will provide a "baseline set of information" that "communities will be able to use […] to understand and compare circumstances."

With this goal, the government puts the onus on communities to identify environmental injustices. **Communities have already been identifying and mapping environmental injustices for years**; for example, the ENRICH Project has a map that visualizes Mi'kmaq and African Nova Scotian communities' proximity to toxic facilities.[24] It is unclear what this study adds to the current literature; while ECCC aimed to develop a "baseline set of information" for communities to use, the information provided is incredibly difficult to understand, and **the government fails to take responsibility** for the health and wellbeing of communities across Canada.

[24] Maps. The ENRICH Project. Accessed July 19, 2026. www.enrichproject.org/maps

What We Recommend

The Strategy is written in a clear and coherent manner with no grammatical or formatting issues. The attention to detail makes the Strategy easy to read, and shows that the government is dedicating a high level of care towards addressing environmental racism and justice.

Within the Strategy, Environment and Climate Change Canada clearly explains how the findings of the study, alongside additional research, will be used to inform the development of the federal environmental justice decision-making tool, and the identification of key areas for further research and funding. This includes disseminating study results across government agencies, particularly to Natural Resources Canada, Health Canada, the Department of Finance, the Canadian Institutes of Health Research, National Research Council of Canada, and National Sciences and Engineering Research Canada by January 2028, to support a "whole-of-government" approach to federal environmental justice decision-making.

The Strategy makes it clear how the government envisions the methods, results, and conclusions from its study will add to existing and ongoing community identification and mapping processes. The government commits to actions that will help it achieve this vision, including disseminating methods and findings, conducting further research, and funding community consultations and projects.

Part 2 and Annex A: The Study

What is in the Strategy & What is Missing

The study examined racialized, Indigenous, and low socioeconomic status communities. Newcomer and immigrant communities were not studied. **The words "newcomer," "migrant," or "immigrant" are not used even once throughout the Strategy.**

The study examined the connections between race, socio-economic status, Indigeneity, and environmental risk, related to the location of environmental hazards. On ECCC's "About the Study" page, published on October 15, 2025, the government committed to explore three additional, qualitative issues,[25] none of which were clearly studied or addressed in the draft Strategy:

- "Who is represented in environmental decision-making"
- "Concerns about fairness in how environmental rules are applied"
- "Current federal programs that may support environmental justice"

[25] About the Study. Government of Canada. Updated October 15, 2025. Accessed July 20, 2026. www.canada.ca/en/environment-climate-change/services/strategic-policy-branch/environmental-justice/study.html

What We Recommend

Newcomers and immigrants are explicitly included in the study on environmental risks and hazards. If analysis was not possible due to data availability, the lack of data is addressed as a limitation. The Strategy makes it clear that **immigrant communities are also impacted by environmental racism and injustices** in Canada. Environment and Climate Change Canada commits to funding additional research focused on the environmental hazards being experienced by racialized newcomers and immigrants **between 2026-2031.**

Environment and Climate Change Canada holds itself accountable to its earlier goals and clearly explains whether these qualitative aspects were studied. If they were not studied, the Strategy explains why, and lays out clear, actionable steps for analyzing them moving forward. This includes collaborating with communities, the Department of Finance, the Canadian Institutes of Health Research, National Research Council of Canada, and National Sciences and Engineering Research Canada to identify funding and research opportunities.

Results and lessons learned

What is in the Strategy & What is Missing

The entire study — especially the "Where environmental inequity is highest," "Further opportunities," and "Additional analyses" sections — is written in highly inaccessible language. For the most part, these sections do not actually highlight findings that correspond with their titles, instead sharing confusing phrases like "The focus of federal regulatory intersects was on analysis with respect to public perspectives' suggestions that the federal legislative and regulatory system may be responsible for environmental inequities, but also offer potential opportunity to address environmental inequities," and vague statements like "results are influenced by underlying patterns and analytical assumptions." Rather than clearly sharing context, methodology, results, conclusions, and limitations in a logical format, the government is **obfuscating** its description of the study. The text is **confusing and difficult to understand**, and is full of unnecessary complexity, jargon, and ambiguous statements rather than relevant information. This raises concern that the study's results are being obscured rather than clearly communicated on purpose.

Throughout Part 2, the government emphasizes that "active approaches to engagement (e.g., community focused)" and studies that are "shaped by the communities involved" can be more effective, and provide better outcomes and opportunities. The government aims to "... ensure that similar analyses can be carried out consistently across Canada." It is unclear who will be responsible for funding and carrying out community engagement, consultations, and community-based research and analysis. No task delegation or funding commitment is made, no timelines are set, and no goals are set to increase community capacity to carry out this work.

What We Recommend

The language used throughout the Strategy is accessible and easy to understand, with minimal use of jargon. Information flows in a logical manner and is organized with headings that actually describe what is discussed in each section. Key information about the study including context, methodology, results, conclusions, limitations, and commitments to next steps are clearly included and described.

Going forward, the government commits to expanding, improving, and contextualising study findings with community involvement. The government also commits to funding community-based environmental justice research and building community capacity across the country.

This commitment could be in line with research that ECCC already funds through the Environmental Damages Fund (EDF), which receives its money from penalties, fines, and voluntary payments for environmental violations across Canada.[26]

Such funding would be aligned with a common desire among participants at a community consultation we conducted in Toronto, ON in June 2026: people want the federal government to increase its investment into community-based environmental justice research.[27]

[26] Environmental Damages Fund. Government of Canada. Updated July 7, 2026. Accessed July 20, 2026. www.canada.ca/en/environment-climate-change/services/environmental-funding/programs/environmental-damages-fund.html

[27] Huschka A, Allen, K, Milligan, A, Bhalla M. Community Feedback on Environmental Racism and Environmental Justice Collected at Toronto Climate Week. Shake Up The Establishment. Published July 1, 2026. Accessed July 20, 2026. shakeuptheestab.org/nej-toronto-feedback

Results and lessons learned

What is in the Strategy & What is Missing

Throughout the study, the government highlights how community perspectives and involvement, "participation from partners," and targeted context-specific analyses are needed. It is, however, stated several times that community-centred work is "… not solely the responsibility of the federal government." The government repeatedly shifts responsibility for community-based consultations and research onto impacted communities, even though they are legally required to consult with interested communities. The government undermines its role in conducting community-based research and consultations, and in rectifying environmental injustices across Canada.

Throughout Part 2 of the draft Strategy, the government repeats that, though the findings of the study and statistics more generally "support understanding" of regional patterns, interpretations tied to "places, [lived] experiences, and perspectives" are key to understanding how specific communities are impacted by environmental injustices. All data were sourced from federal programs.

Environmental racism and justice issues are best contextualized at a community level. Though this is highlighted several times, the study did not examine community-based data or patterns, lived experiences, community histories, or local contexts. No disaggregated data were collected or examined, and only national-level data were analyzed.

What We Recommend

The Strategy makes it clear if and how Environment and Climate Change Canada respected its obligation to "**consult or cooperate with any interested persons, bodies, organizations or communities**" while carrying out this study, as laid out in the Act.[28] Moving forward, Environment and Climate Change Canada commits to properly consulting interested parties in their research practices, while promoting community-based environmental justice research through funding and capacity-building. Funding and grant opportunities will be identified in collaboration with the Department of Finance, the Canadian Institutes of Health Research, National Research Council of Canada, and National Sciences and Engineering Research Canada.

Our dream Strategy would have collected disaggregated, community-level data (both qualitative and quantitative) as part of its study, to better understand community-specific experiences and contexts. Since this was not done, the Strategy must address the lack of disaggregated data and community perspectives as limitations of the study. Environment and Climate Change Canada must also commit to furthering more comprehensive community-based research through funding and capacity-building, by collaborating with the Department of Finance, the Canadian Institutes of Health Research, National Research Council of Canada, and National Sciences and Engineering Research Canada.

[28] *National Strategy Respecting Environmental Racism and Environmental Justice Act*. Minister of Justice; 2024. Accessed July 19, 2026. lois-laws.justice.gc.ca/eng/acts/N-16.85/FullText.html

Lessons learned and additional considerations

What is in the Strategy & What is Missing

This section includes a discussion about how there was "frequent discussion of data shortages for measuring relationships or challenges" when the Act was being developed. The government argues that there is in fact no universal lack of data, rather that people lack awareness of the data available, practical ability to use multiple data sets, and capability to "organize and use the data in ways that meet user needs." The government argues that analysts "should reflect deeper consideration of existing data" before collecting new data.

While analysts can consider using existing data sets, they must be made accessible and provided in usable formats. The government highlights analysts' lack of capabilities and awareness, but fails to take responsibility for their data sets being difficult to find, access, and use. Further, there is no discussion about the differences in availability between federal and local data, or what the federal government's role should be in supporting local, provincial, or regional data sets.

The government acknowledges that the public have expressed interest in "including more variables that reflect socioeconomic conditions and intersectionality," but states that they did not include these variables because "adding more variables can make it harder to identify specific relationships," and that "expanding the set of variables requires a clear understanding of the purpose of the analysis and the questions it aims to answer." However, the government fails to provide a clear rationale for why it failed to conduct an intersectional study. This is especially concerning because the study's lack of intersectional analysis is a major limitation that excludes the unique exposures experienced by certain identities (e.g., racialized and Indigenous women) that further perpetuate the injustices they face.

What We Recommend

The federal government commits to making existing federal datasets related to environmental injustices accessible and usable, and discusses its role in supporting local, provincial, and regional datasets.

Environment and Climate Change Canada, Natural Resources Canada, and Health Canada commit to creating a **national environmental justice hazards and health database on enviroequity.ca,** which consolidates federal datasets to show the locations, community health impacts, and real time updates on environmental hazards.[29] This is an accessible solution to section 3(3)(a)(ii) of the Act, which requires the Strategy to provide information and statistics about environmental hazards.[30] In addition to making this data accessible to the public, ECCC commits to reporting on hazard mitigation progress annually to increase federal accountability.

The government should have **held itself accountable to the Canadian public** by conducting analyses that reflect intersectionality, as people and organizations have advocated for.[31] Since this was not done, the government must hold itself accountable by addressing the lack of intersectional variables and analyses as limitations of the study, and commit to conducting and/or funding intersectional environmental justice research moving forward. Funding and grant opportunities will be identified in collaboration with the Department of Finance, the Canadian Institutes of Health Research, National Research Council of Canada, and National Sciences and Engineering Research Canada.

[29] Huschka A, Hirji A, Devoe M, Patterson ML, Bhalla M. Policy Brief: Feedback on the National Environmental Justice Strategy Foundations. Shake Up The Establishment. Published December 11, 2025. Accessed July 18, 2026. shakeuptheestab.org/wp-content/uploads/2025/12/SUTE-NEJ-Fall-2025-Survey-Responses.pdf

[30] *National Strategy Respecting Environmental Racism and Environmental Justice Act*. Minister of Justice; 2024. Accessed July 19, 2026. lois-laws.justice.gc.ca/eng/acts/N-16.85/FullText.html

[31] Submission to Environment and Climate Change Canada on Environmental Justice and Environmental Racism. Canadian Human Rights Commission. Published May 20, 2026. Accessed July 20, 2026.

Further opportunities

What is in the Strategy & What is Missing

The government states that there is an ongoing need for "input and discussion" about further opportunities, and that "it may be useful to develop mechanisms to receive feedback and discuss methodologies." However, the government fails to acknowledge that several organizations including SUTE[32] have already provided input on the development of the Strategy, including repeatedly meeting with ECCC staff and offering support. ECCC's public engagements and expert focus group for the study and its methodology[33] are also never acknowledged.

The government acknowledges that the public has advocated for "more detailed analyses," but states that their objective with the study was instead to "support informed dialogue rather than identify or categorize specific communities." However, there is no clarity on why the government's study objectives were the opposite of what the public is interested in and has been advocating for,[35] even though the **federal government is meant to serve the Canadian public**. The government fails to hold itself accountable to the needs and interests of the Canadian public.

[32] Huschka A, Hirji A, Devoe M, Patterson ML, Bhalla M. Policy Brief: Feedback on the National Environmental Justice Strategy Foundations. Shake Up The Establishment. Published December 11, 2025. Accessed July 18, 2026. shakeuptheestab.org/wp-content/uploads/2025/12/SUTE-NEJ-Fall-2025-Survey-Responses.pdf

[33] About the Study. Government of Canada. Updated October 15, 2025. Accessed July 20, 2026. www.canada.ca/en/environment-climate-change/services/strategic-policy-branch/environmental-justice/study.html

[35] Submission to Environment and Climate Change Canada on Environmental Justice and Environmental Racism. Canadian Human Rights Commission. Published May 20, 2026. Accessed July 20, 2026. www.chrc-ccdp.gc.ca/resources/publications/submission-environment-and-climate-change-canada-environmental-justice-and

What We Recommend

Environment and Climate Change Canada **holds itself accountable to the people, organizations, and communities that participated in discussions** and provided input on the development of the Strategy by linking to a publicly available **"What We Heard" report,** or including it as an additional Annex. It is made clear how findings from these consultations have informed the Strategy.

Environment and Climate Change Canada commits to adequately funding community consultations moving forward, as it currently admits that it does not have a dedicated fund for Indigenous engagement in developing this Strategy.[34] This can be done by collaborating with the Department of Finance, Crown-Indigenous Relations and Northern Affairs Canada, the Canadian Institutes of Health Research, National Research Council of Canada, and National Sciences and Engineering Research Canada to identify funding and grant opportunities.

Within the Strategy, the government **holds itself accountable to the Canadian public** by committing to conducting and promoting the detailed analyses that people and organizations have advocated for. This includes community centred research and biomonitoring,[36] the use of disaggregated and race-based data, and intersectional analyses.[35] The government's commitment includes funding and capacity-building activities within communities and organizations that are able to conduct further research. Beyond this, all communities receiving federal supports will have agency and decision-making power over how their data is shared and used.

[34] Indigenous Engagement. Advancing Environmental Equity. Updated February 26, 2026. Accessed July 20, 2026. enviroequity.ca/indigenous-engagement

[36] Huschka A, Hirji A, Devoe M, Patterson ML, Bhalla M. Policy Brief: Feedback on the National Environmental Justice Strategy Foundations. Shake Up The Establishment. Published December 11, 2025. Accessed July 18, 2026. shakeuptheestab.org/wp-content/uploads/2025/12/SUTE-NEJ-Fall-2025-Survey-Responses.pdf

Further opportunities

What is in the Strategy & What is Missing

The government states that this study “highlights the importance of understanding what data may already exist” before “considering collecting new data.”However, the government does not share any evidence to support this claim, and it is not a finding of the study.

Additional Analyses

The "representation in policy making” section states that “results showed” various challenges regarding community engagement. These qualitative claims are **not results of the government's quantitative study,** and it is unclear how the study could lead to these conclusions, as the government does not detail community engagement or consultation as part of its methodology.

The government states that “there is no universally accepted or practical approach to engagement and consultation that yields environmentally-just representation,” and that this leads to several challenges. There has never been a universally accepted approach to any kind of research or community engagement; all methods can be contested, and all come with challenges and limitations. Despite this, countless organizations including SUTE,[37,38] have conducted successful community consultations using a variety of approaches.

[37] Huschka A, Allen, K, Milligan, A, Bhalla M. Community Feedback on Environmental Racism and Environmental Justice Collected at Toronto Climate Week. Shake Up The Establishment. Published July 1, 2026. Accessed July 20, 2026. shakeuptheestab.org/nej-toronto-feedback

[38] Huschka A, Devoe M, Bhalla M, Seaifan Z. Community-based Feedback on the Right to a Healthy Environment under the Canadian Environmental Protection Act. Shake Up The Establishment, The Women’s Healthy Environments Network, Finance Engage Sustain. Published March 7, 2025. Accessed July 20, 2026. shakeuptheestab.org/wp-content/uploads/2025/03/RTHE-Community-Feedback-Report.pdf

What We Recommend

All conclusions shared in the Strategy are strictly backed by the study’s findings or published evidence. Rather than sharing speculations, the description of the study focuses on clearly sharing its findings, conclusions, and limitations, and how these will inform policy action.

Rather than stating that there is no universally accepted approach, the Strategy clearly highlights the methods that the government used to consult with and engage communities throughout the study and the development of the Strategy itself. The advantages and limitations of the approaches used are discussed, and Environment and Climate Change Canada makes a commitment to continue to engage with and consult communities in its environmental justice research as it improves upon its approaches.

Further opportunities

What is in the Strategy & What is Missing

When defining the statistical analyses used, key values are provided for interpreting Spearman ranked correlations and Moran's I, however, key interpretive values are not provided for odds ratios or relative rates.

The odds ratios are first defined as examining "the difference in odds of a community having a specified population group (e.g., racialized or Indigenous) depending on the presence of a hazard," and then it is stated that "population presence is the 'exposure' and the existence of a hazard was treated as the outcome." However, there is an error in the explanation of the odds ratios; based on definitions used throughout analysis, population presence should be the exposure and the existence of a hazard should be the outcome.

Under "Datasets and variables," it is stated that people have raised concerns about workplaces as a "potential source of environmental exposure and injustice," but that relevant data was "not readily available for this assessment."

While we are happy to see the government address this important limitation in Annex A, it was not mentioned in Part 2, or integrated throughout the rest of the draft Strategy.

What We Recommend

Key values and clear definitions are provided for all statistical analyses throughout the Annex so that the results are clear and easy to follow.

For clarity, the initial odds ratio definition is corrected to "odds ratios examined the difference in odds of the presence of a hazard depending on a community having a specified population group (e.g., racialized or Indigenous)."

Part 2 of the Strategy highlights the lack of data on workplace populations as a limitation in its study. Environment and Climate Change Canada commits to addressing limitations regarding workplace exposures and injustices as part of the Strategy's future considerations and next steps, including through funding for future research. Funding and grant opportunities can be identified in collaboration with the Department of Finance, Employment and Social Development Canada, the Canadian Institutes of Health Research, National Research Council of Canada, and National Sciences and Engineering Research Canada.

Further opportunities

Annex A

What is in the Strategy & What is Missing

In the "Spatial relationships" section, it is stated that spatial approaches were "based on technical feedback from experts." However, there is no detail on which experts provided technical feedback on the study's spatial approaches.

Under Figure 2, it is stated that visualizations resulting from the analysis of PEH using quartile scales are "not included here but largely demonstrate the same trends outlined in Figures 1 and 2." The PEH visualizations are not made accessible. Though the government states that they are "substantially more complicated to explain," it also acknowledges that they include more nuance. The PEH visualizations are therefore worth accessing for more detailed results, as well as for transparency.

Within the study, the government highlights several aspects of environmental hazards that can impact exposures and injustices, but were not included in the study or analysed. For example:

- "Pollution volume, specific compounds and their toxicity or timing and frequency of releases" from sites.
- "Pollutant type, dispersion, and exposure," aspects which the government states will affect impacts.
- "The PEH considers current environmental hazards, rather than the past (i.e., potential decades of potential hazards)."
- Details on the types and volume of pollution released from sites were not studied even though these aspects could significantly influence the impacts faced by communities and lead to health disparities.
- Though the government acknowledges that pollutant types, dispersion, and exposure influence community impacts, these aspects were not studied.
- Past hazards were not studied, even though potential decades of exposure could have long-term consequences and compounding interactions with present day exposures, as has been the case with decades of exposure to mercury in Grassy Narrows First Nation.[39]

[39] The legacy of mercury poisoning in Grassy Narrows First Nation. November 5, 2019. Accessed July 20, 2026. www.afn.ca/wp-content/uploads/2019/12/Judy-DaSilva-and-Myriam-Fillion-Presentation-Compressed.pdf

What We Recommend

To improve transparency, the Annex provides an appropriate level of detail on all information shared; details are either included directly within the study methods and results, or through links that lead to further visualizations or clarifications. This includes detailing what kind of experts were consulted in designing the government's study, and providing more nuanced figures laying out its findings.

Our dream Strategy would have conducted more detailed analyses including: past environmental hazards; sites' pollution volume, specific compounds, and toxicity or timing and frequency of release; pollutant types, dispersion, and exposure; as part of its study, as these are all aspects that the government acknowledges will influence the impacts faced by communities. Since this was not done, the Strategy must address the lack of these analyses as limitations of the study, and commit to funding and conducting more detailed research on environmental hazards. Funding and grant opportunities can be identified in collaboration with the Department of Finance, Health Canada, the Canadian Institutes of Health Research, National Research Council of Canada, and National Sciences and Engineering Research Canada.

Further opportunities

Annex A

What is in the Strategy & What is Missing

When discussing the Moran's I test results, it is stated that "there was less clustering in combined LSES," and that this could be a reflection of "the strong skew in visible minority and Indigenous rates, often because people choose to be co-located with 'like populations.'" Within the Strategy, the government frames the co-location of communities as individual choice, rather than as a result of peoples being forcefully relocated into certain geographical locations through the creation of reserves, land dispossession, or racist policies that have determined the spatial patterning of neighbourhoods across the country.[40,41]

The government states that a major goal of the study was to develop methodologies that can "be interpreted by broader audiences," "used, assessed, and refined over time" in communities-level analyses, and "used to examine more specific relationships." The study's methodology is not highlighted within Part 2 of the draft Strategy, only in Annex A. There are also no clear next steps for making the developed methodologies more accessible, continuing to use and refine them, or sharing them with parties who can conduct community-led studies.

The government acknowledges that it is "not plausible to address all potential sources of data, compounds, or potential environmental racism/EJ concerns in a single approach." While this study could not address all data sources or concerns, the government does not commit to conducting or funding additional research to address missed areas.

[40] The Alberta Teachers' Association. Forced Relocation of Indigenous Peoples in Canada. Walking Together: Education for Reconciliation. Accessed July 20, 2026. teachers.ab.ca/sites/default/files/2025-04/pd-wt-16e_forcedrelocationofindigenouspeoplesincanada.pdf

[41] Waldron I. Re-thinking waste: mapping racial geographies of violence on the colonial landscape. Environ Sociol. 2018;4(1):36-53. doi.org/10.1080/23251042.2018.1429178

What We Recommend

In acknowledgement of Canada's historical and ongoing colonial violence, the sentence about community co-location is rewritten to "This may reflect the strong skew in racialized and Indigenous rates, often because people choose to be co-located with "like populations," or have been forced to do so due to racism, settler colonialism, and related policies like land dispossession."

Part 2 of the Strategy includes a simple, step-by-step summary of the study's methodology before results and conclusions are shared, and the government commits to refining and disseminating its methodologies, and funding and supporting communities in conducting community-led studies. An accessible version of the study is published alongside the Strategy so that broader audiences can access and understand its methodology and results in detail.

The government clearly acknowledges the limitations of this study, and makes clear recommendations for further research. Environment and Climate Change Canada commits to funding and conducting additional studies on environmental racism and justice in Canada, in collaboration with the Department of Finance, the Canadian Institutes of Health Research, National Research Council of Canada, and National Sciences and Engineering Research Canada.