



**Submission on the National Strategy
Respecting Environmental Justice and Environmental Racism**

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by

Seniors for Climate Action Now!

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To the Honourable Julie Dabrusin, Minister of the Environment, Climate Change and Nature

Seniors for Climate Action Now! (SCAN!) is responding to this consultation because Climate Action is Climate Justice. In communities around the world there is a growing awareness that the climate crisis is also a human crisis. Climate justice focuses our attention on people and social ecosystems as well as the larger, natural ones. Climate justice is where the climate crisis and those basic rights meet human rights, Indigenous Peoples' rights and labour rights. If climate is the crisis, then justice is in the solution.

This national strategy was to be based on extensive consultation, but despite working in multiple pan-Canadian coalitions, we heard about this consultation only from Shake Up the Establishment, and not at all about previous rounds of consultations. At a July online session with about 40 interested people from many organizations, the consultation had been news to most. None of the many Indigenous communities we work with reported being contacted by your department.

In addition, we find no references at all to the additional health harms for seniors of environmental injustice or racism, and no references to hearing from Indigenous elders. It appears no seniors groups were consulted in prior rounds.

We note that this is one of a number of major federal consultations with short mid-summer deadlines, a particular challenge for all-volunteer groups. And it seems you plan to table the Strategy within weeks of the consultation closing date. This does not reflect well on the federal government's commitment to consultations, especially with Indigenous peoples. And it begs the question to what extent the federal government wishes to conduct meaningful consultations.

That said, SCAN! welcomes the draft Strategy and the progress it reflects. Canada has named environmental racism as a form of systemic racism, legislated a duty to respond, centred the communities that bear the heaviest environmental burden, and grounded its approach in the principles of procedural, recognition, distributive, and restorative justice. The *National Strategy Respecting Environmental Racism and Environmental Justice Act* also reflects Canada's commitment to implement the United Nations Declaration on the Rights of Indigenous Peoples.

Section 3(3)(b) of the Act mentions measures that the Strategy should include amendments to federal laws, policies and programs, compensation for affected individuals and communities, the involvement of community groups in policymaking, and the collection of health outcome data near environmental hazards. But the proposals in this draft Strategy are largely procedural: tasking a team, developing guidance and establishing mechanisms. These describe how the federal government will organize itself. They do not yet describe what it will deliver, or guarantee, to the communities the Act was written to protect. We make the following recommendations to close those gaps.

1. Convert the framework into binding, time-bound commitments.

The final strategy should pair each of the four priority areas with specific, measurable commitments, each with a deadline and a named accountable body, who should report on them annually through the five-year cycle the Act requires. Where the draft proposes to develop principles, values, priorities and guidance, the final version should state what will be done, by when, and how success will be measured.

Currently, the government is only required to share progress reports every five years, which is too infrequent given the urgency of environmental health harms.

2. State the federal government's own responsibilities, not only its convening role.

The draft frames environmental racism as a whole-of-society challenge that often falls outside federal jurisdiction. Collaboration across governments is necessary, but the Act assigns the duty to the federal Minister, and Canada already holds direct authority in several areas the draft itself lists, such as federal Crown lands and First Nation reserve lands, the Federal Contaminated Sites Action Plan, and the right to a healthy environment under the Canadian Environmental Protection Act, 1999. The strategy should set out concrete federal action in these areas rather than deferring to shared responsibility.

3. Establish Federal funding for community-led environmental justice education and research,

The draft strategy identifies funding as an area for future action, but it does not commit to sustained, dedicated funding that enables communities to build the long-term capacity needed to advance environmental justice.

Advancing environmental justice requires long-term investment in the communities most affected by environmental harms. Frontline communities, Indigenous nations, grassroots organizations, and researchers need stable, multi-year federal funding to carry out community-engaged environmental justice work. This should include dedicated support for community-led research and biomonitoring in impacted areas. Communities must have the resources to lead their own monitoring efforts and govern their own health data through a data sovereignty approach. Funding should also support community-led education, knowledge mobilization, and public awareness initiatives that build long-term local capacity to advance environmental justice.

4. Establish a federal agency dedicated to researching and addressing environmental health inequities

The draft strategy proposes establishing a dedicated federal team to coordinate environmental justice work, but it does not commit to creating a permanent agency with explicit responsibilities, including researching, monitoring, and publicly reporting on environmental health inequities across Canada.

Advancing environmental justice requires a permanent, adequately resourced agency with a clear mandate and long-term accountability that cannot be easily dismantled or deprioritized by future governments.

Without consistent national data and oversight, it is not possible to design effective, evidence-informed policies that address environmental harms faced by racialized and marginalized communities, particularly with respect to intersectional and cumulative impacts. This agency should be established through a durable governance mechanism that protects environmental justice commitments from political change and supports long-term implementation, ongoing community engagement, and accountability for progress.

5. Embed Environmental justice and environmental racism across all areas of federal decision-making.

A lens on all legislation, regulation and policies is needed, similar to gender considerations, to ensure that the Strategy is not limited to federal responsibility for crown lands and other such explicit responsibilities.

6. Commit to redress and to community-informed health monitoring.

The draft is largely silent on compensation and steps back from health data collection, describing it as better suited to targeted analyses. Yet both are actions the Act expressly contemplates. Consistent with section 3(3)(b), the final strategy should advance restorative actions, including timely remediation and, where harm is documented, frameworks for compensation, and should support community-informed health monitoring for communities living near documented environmental hazards.

7. Expand the strategy to include access to nature

By limiting the Strategy to hazards, it is left ineffective for just access to nature, critical to good health. The Strategy should be expanded to include equitable access, such as to national parks, tree canopy, green spaces and outdoor recreation, both in areas within federal jurisdiction and when collaborating with other levels of government. An example would be when the federal government is funding affordable housing.

SCAN!. is pleased to submit these comments for your consideration. SCAN! asks to be proactively included in future consultations on this and other climate action issues.

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Seniors for Climate Action Now! (SCAN!/AACU!) is building a pan-Canadian seniors' climate action movement for the benefit of generations to come. We are working with other climate activists to create a democratic, just, and transformative movement to address the climate crisis.

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