



August 10, 2026

TO: Hon. Marjorie Michel, PC, MP, Minister of Health

AND TO: The Honourable Julie Aviva Dabrusin, Minister of Environment and Climate Change

% Environmental Justice and Racism Team

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Via email to: hcminister.ministresc@canada.ca and ministre-minister@ec.gc.ca and EJ-JE@ec.gc.ca

Re: Canada's draft National Strategy Respecting Environmental Racism and Environmental Justice 2026-2031

Dear Ministers Michel and Dabrusin,

Please consider the following comments.

Identifying, assessing, compensating for, remediating, and preventing environmental injustice and environmental racism are important functions of government, and many of the concepts introduced in the draft Strategy seem to reflect the government's commitment to redressing environmental racism and injustice.

However, the mathematical and scientific approach appears to uncover instances of injustice.

Canada's draft Strategy Respecting Environmental Racism and Environmental Justice recognizes some important features of this endeavour, though its proposed approach to identifying risk is repeatedly and astonishingly ill-suited to the task:

1. It uses a geographic unit of analysis (500 km²) for so-called "tessellated co-location", a unit of analysis that exceeds or rivals the size of most large Canadian cities (i.e., larger than Montreal, Vancouver, Winnipeg, Quebec City, and rivals even the size of Toronto (620 km²). Though visible minority and racialized populations are often concentrated in large Canadian cities, they are unlikely to be so evenly distributed city-wide or region-wide as to make that geographic unit a useful analytical focus.
2. The hazard exposure risk does not include consideration of:

- a. specific substances among the [326 chemicals reported in the National Pollutants Release Inventory](#), despite their obviously diverse environmental and human health effects, or the degree of toxicity of substances (which varies from relatively benign to extremely hazardous), such as by focusing on the [World Health Organization's list of 10 toxic substances of public health concern](#):
 - i. Air Quality, Energy and Health
 - ii. Arsenic
 - iii. Asbestos
 - iv. Benzene
 - v. Cadmium
 - vi. Dioxins and dioxin-like substances
 - vii. Inadequate or excess fluoride
 - viii. Lead
 - ix. Mercury
 - x. Highly Hazardous Pesticides
- b. the volume of releases which can vary from zero to millions of kilograms per year;
- c. the half-life of substances to help determine the speed at which toxic chemicals biodegrade, though recognizing that sometimes metabolites are also toxic;
- d. The exposure to pesticides on farmland and in forests, the omission of which may underestimate the exposure of Indigenous people living in First Nations communities;
- e. health effects, which would seem to be a primary concern when assessing the disproportionate effects of exposure to toxic chemicals on vulnerable groups, especially groups protected under federal or provincial anti-discrimination legislation. For example, the [Canadian Human Rights Act](#) prohibits discrimination on the basis of:

“race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics, disability and conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been ordered.”

The method of identifying racialized communities is woefully imprecise: e.g., Table 4 proposes to classify a Census Dissemination Area as having a high-proportion of Indigenous people when they comprise anywhere from 9.3% to 100% of its population.

Put another way, the proposed strategy presumes that the mere presence of a polluter in a community is a meaningful measure of hazard.

The lack of geographical measures of the release of pesticides in farmland and forest may contribute to underestimates of the exposure of First Nations Communities to toxic substances.

According to the [World Health Organization, toxic chemicals \(including pesticides and other chemicals\) cause two million deaths annually worldwide](#), which is on the same order of magnitude as deaths due to poor diet (8 million), [tobacco \(8 million\)](#), and [alcohol \(2.6 million\)](#). This estimate is expected to be revised this year.

We are not aware of official Canadian quantitative estimates of harm caused by toxic chemicals; it may be much higher than the sum of 6,515 deaths attributed to occupational exposure to asbestos and 10,443 to lead exposure in the general population ([Inst. for Health Metrics and Evaluation, 2023](#)). Even these may be underestimated ([Kromhout, 2020](#)) and do not include threats from many of the 30,000 chemicals to which Canadians are exposed ([Federal Budget 2024](#) at p. 227). Risks of toxic chemicals may be under-estimated by Canadians. For instance, PHAC estimated that 238 Canadians die from food poisoning annually ([Thomas, et al., 2015 at 824](#)), likely much less than 2% of deaths caused by toxic chemicals.

Canadian government and academic researchers concluded:

“Although previous reviews have investigated inequitable exposures via specific routes of exposure (e.g., indoor air pollution and outdoor air pollution), none, to our knowledge, have focused on carcinogenic exposures more broadly” ([Larsen, 2023 at 2](#)).

Their scoping review of 57 articles included 46 concerning the United States. The sole Canadian study addressed general air pollution ([Kershaw, et al., 2013 at 7 and 265-278](#)) and 45 focussed on air pollution, tobacco, or food environments. Occupational exposures were excluded from the scope. ([Larsen et al., 2023 at 4](#)). In 2015, Carex Canada developed a methodology to quantify chemical risk ([Peters et al., 2015, pp. 64-71](#)) that was later cited by [43 PubMed-indexed articles](#), seven of which concerned Canadian exposures, but only in occupational settings. International studies found that exposures are often concentrated in socioeconomically disadvantaged populations ([Larsen et al. 2023 at 2](#)) and that

“neighborhoods with higher proportions of low-income residents, racialized people, or same-sex couples had higher exposures to carcinogens and environments that may influence cancer risk...with most research still focusing on air pollution.” ([at 1](#))

Furthermore, we note that the youth group [Shake Up the Establishment](#) recommends measures that the government is not expressly required to take by Parliament, but seem like sensible features of an effective Strategy, including (1) funding adversely affected communities to conduct locally specific research, (2) establishing an agency to administer the Strategy, (3) increase the reporting frequency to annually, (4) improve community outreach, and (5) elevate

the Strategy to a standard governance tool (like environmental assessments, child rights impact assessments, or GBB+).

Plainly, the federal government has access to a lot of highly detailed, quantitative, geographically specific toxic pollution release and Census sociodemographic data that could help fill a large gap in the research literature, as well as a mandate from Parliament to analyze these data in a way that best reduces injustice. Doing so requires the government to rethink its approach.

In the coming weeks, we may supplement this input with some indicative data based on Census and Environment Canada's National Pollutant Release Inventory data. It was not possible to complete the analysis during the short window for consultation and, considering they particularize concerns that I raised repeatedly orally and in writing with Environment and Climate Change Canada officials in recent months. I did not foresee that these defects would remain in the Strategy proposed to be offered to Parliament.

Respectfully submitted,



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