



Canadian Environmental Network
Toxics Caucus

Réseau canadien de l'environnement
Comité des Substances Toxiques

136F Billings Avenue
Ottawa, ON K1H 5K9

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

August 10, 2026

AND TO: The Honourable Julie Aviva Dabrusin, Minister of Environment and Climate Change
% Environmental Justice and Racism Team

Environment and Climate Change Canada, Zibi Building

125 Zaida Eddy Private

Ottawa, Ontario K1R 0E3

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,

Much of the narrative analysis properly underscores the importance of preventing and remedying environmental racism and injustice; however, the mathematical and scientific approaches appear ill-equipped to uncover instances of injustice. For instance, the Strategy proposes to:

1. Rely on 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 rivaling even the size of Toronto at 620 km²), even though visible minority and racialized populations are typically concentrated in neighbourhoods that are better described by Census Dissemination Area units.
2. The assessment of hazard exposure risk does not include consideration of:
 - a. any 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 those substances (which obviously varies from relatively benign to extremely hazardous);
 - b. the volume of releases, which can vary from zero to millions of kilograms per year;
 - c. the exposure to pesticides on farmland and in forests;
 - d. health effects of exposure.

According to the [World Health Organization, toxic chemicals \(including pesticides and other chemicals\) cause 2 million deaths annually worldwide](#), which is on the same order of magnitude

as the number of deaths due to [poor diet \(7 million\)](#), [tobacco \(8 million\)](#), and [alcohol \(2.6 million\)](#). This WHO estimate of harms from toxic chemicals and pesticides is expected to be revised this year.

We are not aware of official Canadian quantitative estimates of harms caused by toxic chemicals; the number of attributable deaths 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).

The federal government has access to highly detailed, quantitative, geographically specific toxic pollution release and Census sociodemographic data that could help fill a large gap in the research literature. It also has a mandate from Parliament to analyze these data in a manner that best reduces injustice.

Doing so requires it to rethink its approach and to create a purposeful draft strategy before tabling it in Parliament and, more importantly, goals and strategies to prevent and remedy environmental injustice and environmental racism, not just offer an incomplete technique for communities to check for it.

Furthermore, we note that the youth group [Shake Up the Establishment](#) recommends measures that the government is not expressly required by Parliament to take, 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) increasing the reporting frequency to annually, (4) improving community outreach, and (5) elevating the Strategy to a standard governance tool (like environmental assessments, child rights impact assessments, or GBA+).

Respectfully submitted,



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