



MANITOBA ECO-NETWORK

302 – 583 Ellice Avenue, Winnipeg MB R3B 1Z7

Tel: 204-947-6511 www.mbeconetwork.org

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Re: Feedback on the Development of the *National Strategy Respecting Environmental Racism and Environmental Justice*

The Manitoba Eco-Network (MbEN) is making this submission to provide input on the development of the *National Strategy Respecting Environmental Racism and Environmental Justice*. The following comments are in response to the background information and Discussion Questions included in the [*Foundation 2: Assessing, preventing and addressing environmental racism*](#) engagement guide.

Over the past three years, MbEN has been working with community members in Manitoba to encourage governments at all levels (federal, provincial, and municipal) to enact meaningful legal and policy changes that will better protect disproportionately impacted populations from negative and health consequences and improve their access to environmental justice.

The following comments reflect the past input we provided to the implementation team for the right to a healthy environment framework through written comments, meetings, and a local consultation event held by MbEN on March 27, 2024. More information and the recording of the event can be accessed here: <https://mbeconetwork.org/what-we-do/r2he/>

Through collaborative projects, MbEN has also received considerable input from Manitobans on the need for more access to environmental legal tools, plain language legal information, and more opportunity for meaningful public engagement. The feedback provided in this submission also reflects this previous work:

- Empowering Impact Assessment Project¹
- Healthy Environment, Healthy Neighbourhood Project²
- Navigating the Law to Project the Environment Project³
- MbEN engagement in the parliamentary process for Bill S-5⁴

Topic 1: Defining Environmental Racism in Canada

Discussion question: How would you define environmental racism in the context of a federal national strategy?

¹ Manitoba Eco-Network, *Empowering Impact Assessment*, online: <https://mbeconetwork.org/what-we-do/impact-assessment/>

² Manitoba Eco-Network, *Healthy Environment, Healthy Neighbourhood*, online: <https://mbeconetwork.org/what-we-do/healthy-environment-healthy-neighbourhood/>

³ Manitoba Eco-Network, *Navigating the Law*, online: <https://mbeconetwork.org/what-we-do/navigating-the-law/>

⁴ Manitoba Eco-Network, "Written Submission to the Standing Committee on Environment and Sustainable Development on Bill S-5" (November 21, 2022).

MbEN Response:

Environmental racism should be given a broad definition that captures the experiences of all disproportionately impacted communities in Canada. The definition from the Canadian Race Relations Foundation included in the engagement materials is very narrowly focused on the impacts of toxic wastes on marginalized communities, when the reality in Canada is that environmental racism has caused environmental and health impacts that go beyond those associated with exposure to toxic substances.

In Manitoba, some of the most significant examples of environmental racism involve the past and ongoing [impacts of hydroelectric developments](#) on Indigenous communities and access to clean drinking water. This includes the sourcing of Winnipeg's drinking water from [Shoal Lake First Nation #40](#) territory with no regard for the significant and detrimental impacts this would have on local Indigenous rights-holders.

We do not mean to downplay the very significant and detrimental impacts of toxic substances on communities experiencing environmental racism, but instead recommend adopting a definition that captures the full range of impacts experienced by communities affected by environmental racism in Canada.

Topic 2: Assessing, Addressing and Preventing Environmental Racism

Discussion question: In your experience, how can environmental racism be measured, tracked, counted? What is needed to assess environmental racism that might not exist at this time?

MbEN Response:

In our experience, there is little to no acknowledgement nationally of the environmental racism that has occurred in Manitoba in a number of contexts - e.g., drinking water, hydroelectric developments, forestry, and mining. As a result, we suggest collecting a broad range of information to ensure all experiences are documented across Canada, not just those associated with exposure to toxic substances in certain provinces.

Funding, resources, and an interdisciplinary team of researchers are needed in order to respectfully and meaningfully document the stories of those who have and/or are experiencing the consequences of environmental racism. A variety of different methods should be used to collect data, including audio recordings, videos, and images that document the challenges faced by impacted communities. Face-to-face conversations with the communities who have experienced environmental racism should be prioritized.

Overall, MbEN recommends meaningful engagement with the communities who have experienced environmental racism to determine the full scope of information and appropriate methods required to meaningfully document their experiences.

Topic 2b: Addressing and Preventing Environmental Racism

Discussion question: What are the key areas to focus on in preventing and addressing environmental racism? Are there roadblocks that are in the way or key challenges to pay attention to?

MbEN Response:

One key area to focus on is procedural justice and improving government decision-making processes to more meaningfully include potentially impacted communities, Indigenous rights-holders, and other members of the public. This may require additional supports for disproportionately impacted communities and other groups that require additional resources to meaningfully contribute.

Another priority should be the full implementation of the *United Nations Declaration of the Rights of Indigenous Peoples*, including the creation of decision-making mechanisms that facilitate free, prior, and informed consent from Indigenous rights-holders. For example, see our memo on [*Indigenous-Led Assessments and Indigenous Knowledge in Impact Assessments*](#).

There are many roadblocks and challenges preventing meaningful engagement of marginalized communities and members of the public in environmental decision-making processes. This includes a lack of funding for participants who often need technical and/or legal support to meaningfully participate in governance processes. There is considerable academic literature addressing the best practice elements of meaningful public participation, which includes mechanisms to address some of the major challenges preventing meaningful engagement. For example, see our memo on [*Meaningful Public Participation in Impact Assessment*](#).

Conclusion:

Manitobans have unique experiences and needs that should be considered by the federal government when new laws, policies, and government programs are developed and implemented. We hope the insights of Manitobans on environmental justice shared with you through our work will help guide the development of the implementation framework and ensure better outcomes for Manitobans at the federal level, including improved access to environmental justice.

The Eco-Network appreciates your consideration of our comments and recommendations for the next steps in the development of the *National Strategy Respecting Environmental Racism and Environmental Justice*. We welcome future opportunities to engage with Environment Canada to ensure the highest level of environmental and health protection measures are enacted for the benefit of current and future generations.

Sincerely,

Heather Fast, J.D., LL.M., Policy Advocacy Director

James Beddome, LL.B., Executive Director

About MbEN

The Manitoba Eco-Network is a non-profit registered charity which seeks to strengthen Manitoba's environmental community with the goal of protecting our environment for the benefit of current and future generations. We serve as an umbrella for environmental non-governmental organizations across the province. Our mission is to promote good environmental governance, support and build capacity, advocate for environmental justice, and act as a bridge between environmental organizations, the public, and all levels of government. Learn more at: www.mbeconetwork.org