

Environmental Justice and the National Pollutant Release Inventory (NPRI)

Presentation to NPRI Consultative Work Group

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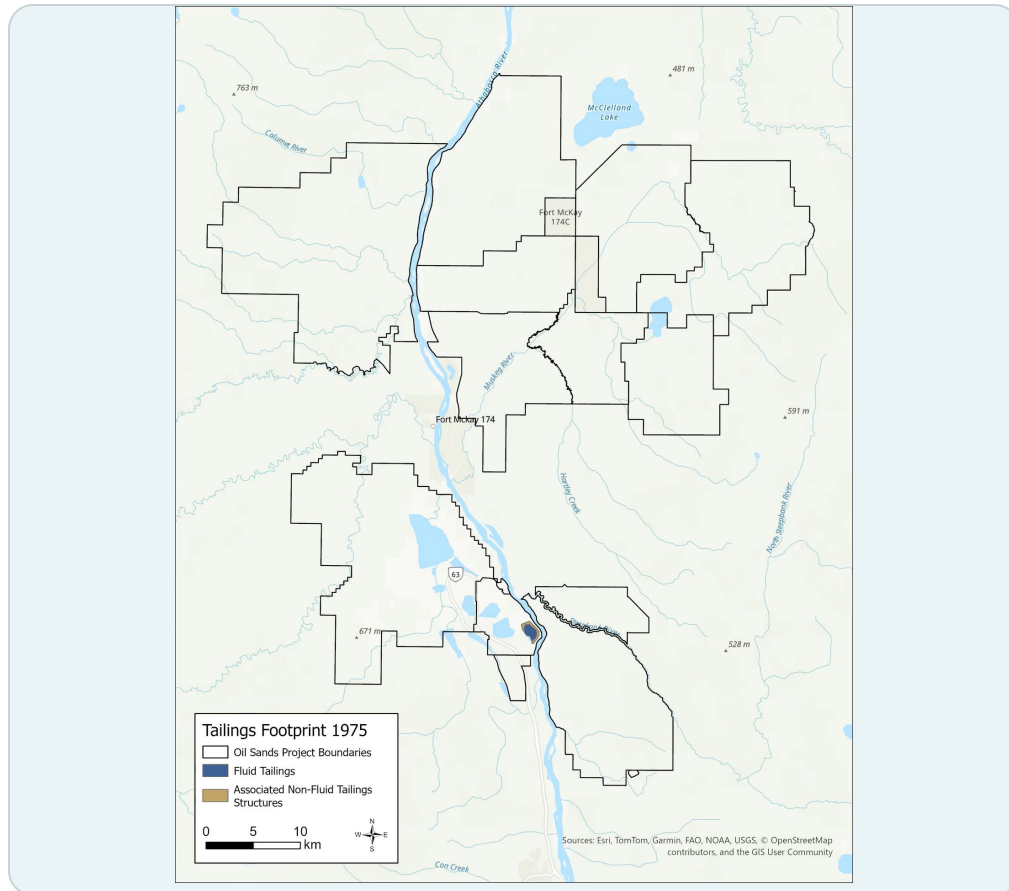
Environmental Racism

- “Environmental Racism” = systemic racism in an environmental context.
- The term was developed in the United States by early environmental justice advocates who were seeking to better protect African American communities from exposure to toxic waste in their communities.
- Often associated with biased environmental approval processes and the location of large-scale developments with significant environmental and health impacts near underrepresented and under resourced communities.
- In Canada, Indigenous communities have been disproportionately impacted by environmental racism, but other racialized communities, particularly Black Canadians, have faced similar outcomes in certain jurisdictions, e.g., Africville in Nova Scotia.

Examples

Environmental racism is not one project – it is an ongoing pattern

Oil-sands development has placed cumulative and intergenerational burdens on Treaty 8 lands, waters and communities.



1967



Development begins

Commercial-scale mining begins.
Fort McKay water concerns are already being raised.

PRESENT



The pattern continues

Communities continue to identify changes and dangers. Complete Information and protection arrive late.

Decades of pollution, incomplete information and delayed protection have transferred risk from industry and governments to Indigenous communities

Mapping by CPAWS Northern Alberta and Keepers of the Water, 50 More Years of Tailings (Sept 2026).

Environmental Justice

- Environmental justice is a broad concept which has been applied across various contexts to support equitable decision-making processes and outcomes.
- Environmental justice is a **very contextual term and means different things to different people**. As a result, there are an increasing number of sub-categories emerging across the world including: climate justice, energy justice, and mercury justice that focus on specific natural resources or impacts.
- There has also been specific recognition of **Indigenous perspectives of environmental justice**.
- Legal Responses from the Government of Canada:
 - Reform of CEPA (2023) – recognition of the principle of environmental justice (s 2(1)(a.3)).
 - [RTHE Implementation Framework](#) (2025) – further explanation of what environmental justice means in a CEPA context.
 - [Draft National Strategy Respecting Environmental Racism and Environmental Justice](#) (2026)

RTHE Implementation Framework, CEPA

The **principle of environmental justice** within the CEPA context refers to:

- avoiding disproportionate adverse environmental and health impacts and burdens falling on different populations,
- considering populations who may be disproportionately impacted by pollution, and
- the meaningful involvement of these populations in decision-making under the Act.

As a principle to be upheld under CEPA, environmental justice involves 4 key tenets:

- **Distributive justice**, which relates to advancing towards equitable protection from pollution risks in CEPA decision-making
- **Procedural justice**, which involves equitable representation and participation in CEPA decision-making
- **Recognitional justice**, which aims to acknowledge and respect the differences between individuals, collective identities, and their concerns, needs and livelihoods when making decisions under CEPA
- **Restorative justice**, which relates to redress or remedy of harm caused by pollution through CEPA risk management and enforcement. [*RTHE Implementation Framework, 22*]

What does this mean for the NPRI?

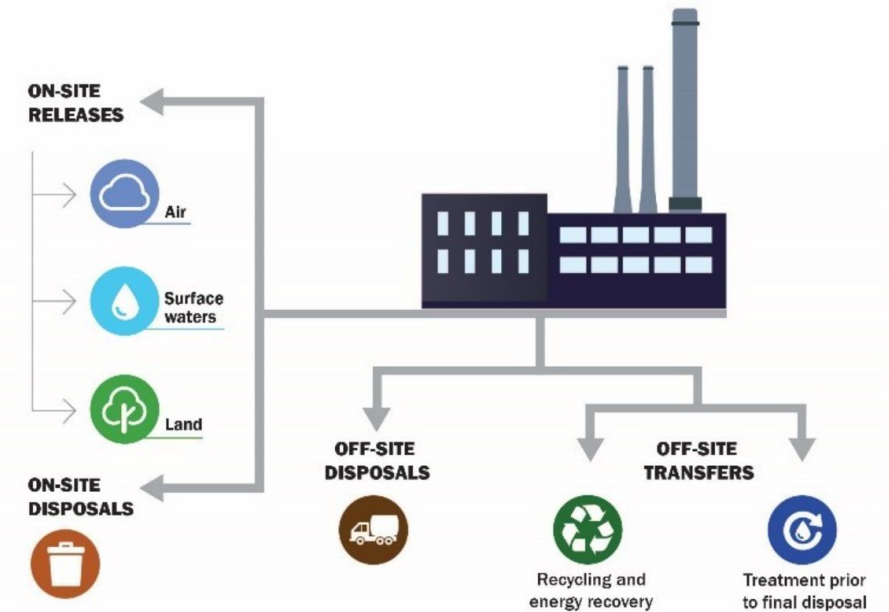
Community Right to Know

- There was a lack of publicly accessible information about the impacts of most chemicals until the 1980s, when citizens around the world began demanding regulatory change to **recognize their right to know** about the health and environmental impacts of potentially harmful substances.
- In response, governments in many countries developed publicly available inventories of the substances being released by certain polluters.
- One of these inventories is Canada's National Pollutant Release Inventory (NPRI), established in 1993. The results of Canada's first NPRI were released in 1994.



What is the NPRI?

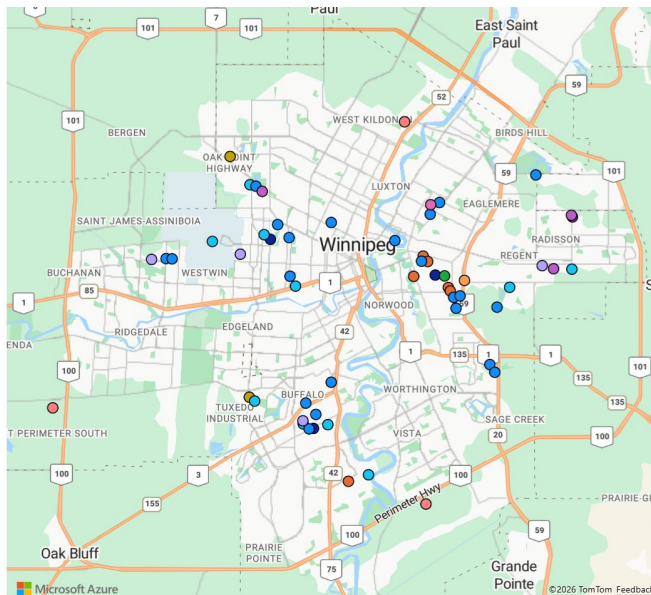
- The NPRI is Canada's **public** inventory of releases, disposals and transfers. The NPRI tracks certain substances listed under CEPA.
- The benefits of using NPRI data in research includes:
 - access to a vast inventory data on the release, transfer and disposal of over 300 pollutants in Canada.
 - long-term trend analysis to better understand pollutant releases and their impacts on ecosystems.
 - identification of environmental priorities on a local or national scale.
 - informed strategic decision making.
 - increased monitoring of trends in pollution reduction and prevention.
- The federal government considers the information provided by the NPRI vital to its efforts to reduce releases of substances of concern to the environment and to protect the health of Canadians.



Source: NPRI,
<https://www.canada.ca/en/environment-climate-change/services/national-pollutant-release-inventory/tools-resources-data/npri-use-in-environmental-research.html>

Limitations of the NPRI

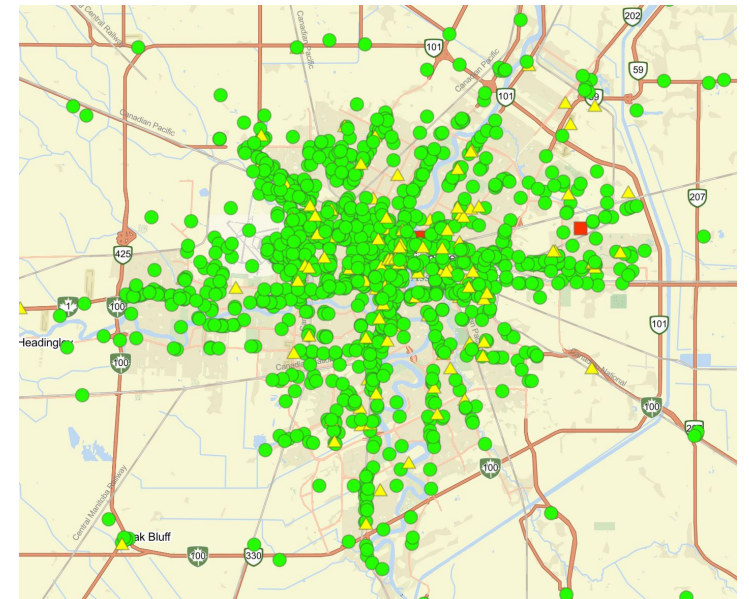
- In some Canadian jurisdictions, like Manitoba, there are a limited number of facilities that meet the reporting thresholds under CEPA, which can make it difficult for citizens to determine the full scope of polluting activities in their communities based on the available information in the NPRI.



NPRI Database: 57 Facilities

IAAC Registry:
85 Projects (Winnipeg)

Environment Act Registry:
156 Projects (Winnipeg)
374 Projects (Central, etc.)



**MB Contaminated Sites: 2
Impacted Sites: 124**

Getting a Complete Picture: Other Sources of Information

The NPRI has been increasingly incorporating links to other sources of information collected and published under CEPA and other government programs. There are also a number of sectoral and substance overviews available through the NPRI that link to other data (e.g., [NPRI Sector Overview: Metal Ore Mining](#))

Other useful information from the Government of Canada:

- **Chemicals at a Glance**: Chemicals Management Plan information sheets are a series of short fact sheets about chemical substances and micro-organisms that are being (or have been) assessed in Canada for their possible risks to human health and the environment.
- **Air Pollutant Emissions Inventory (APEI)**: a comprehensive inventory of air pollutants at the national, provincial and territorial level. The APEI compiles emissions of 17 air pollutants contributing to smog, acid rain and poor air quality since 1990.
- **Facility-reported greenhouse gas data**: Data on the latest greenhouse gas emissions from Canadian facilities and changes in these emissions over time.
- **Federal Contaminated Sites Inventory**: includes information on all known and suspected contaminated sites under the custodianship of federal departments, agencies and consolidated Crown corporations.
- **CNSC Nuclear Facilities map**: This interactive map shows the locations of licensed nuclear facilities in Canada, including nuclear power plants.

Right to a Healthy Environment Portal

- One of the new data innovations that have been implemented as a result of the 2023 changes to CEPA is the creation of a new [Right to a Healthy Environment Portal](#) by Health Canada and Environment and Climate Change Canada.
- The portal provides a single window to information on actions and decisions made under CEPA and is organized to reflect the substantive and procedural elements of the right to a healthy environment.
- This includes linkages to the information contained in the NPRI and suggestions on how to use it.

Protection from
harmful substances
and pollutants

Protection
from
harmful
waste

Clean
and
healthy
air

Clean and
healthy
water

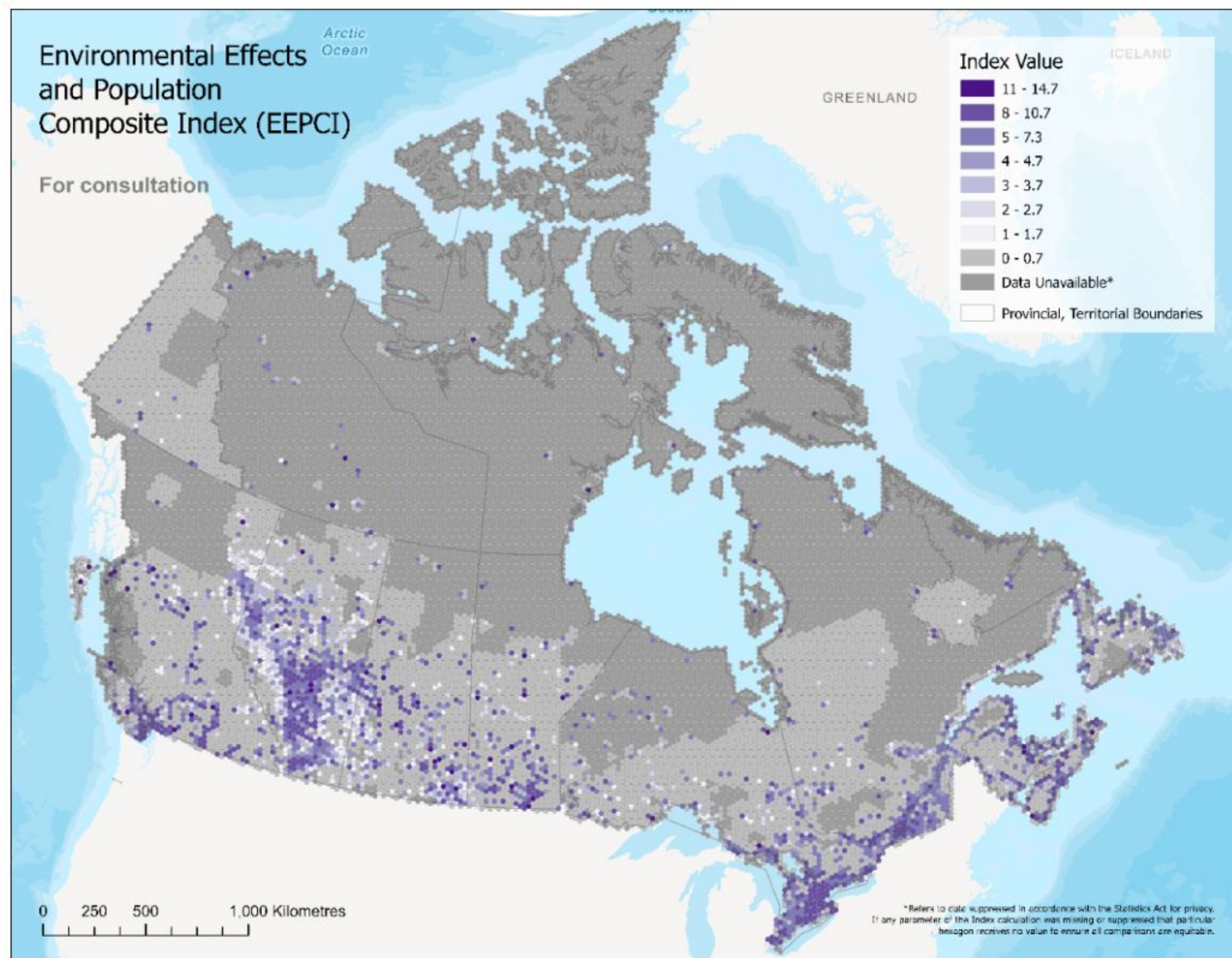
Sustainable
climate

CEPA
accountability

Use of NPRI Data in the EJER Study

- NPRI data was used in the development of the study and map to show relationship between income levels, pollution sources, identification of racialized communities and Indigenous communities.
- The study's findings were summarized in the Draft Strategy document that was published for consultation.
- The “Environmental Effects and Population Composite Index” (EEPCI) presents data in a single mappable measure, illustrating broader associations and enabling comparison across the country.

Figure 4: EEPCI Values Across Canada, by Hexagon



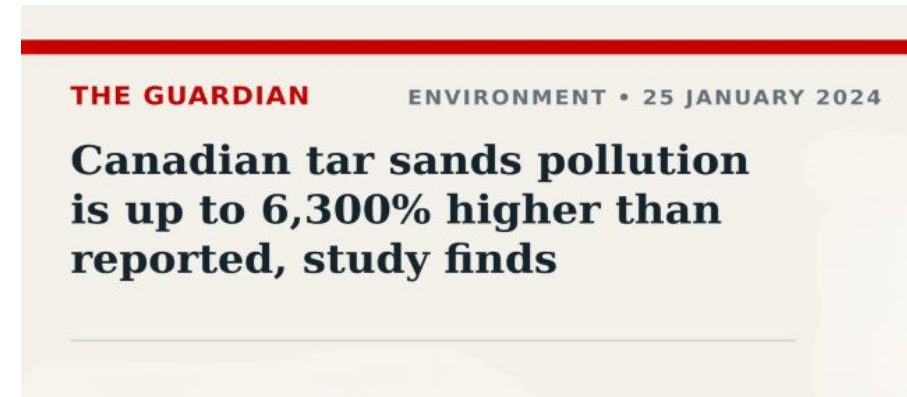
The Evolution of the NPRI

- Since its creation, the NPRI has regularly added and removed substances, lowered reporting thresholds, and removed certain exemptions. These changes allow for the collection of more complete and relevant information on pollutants.
- Reforms were made to CEPA in 2023 have contributed to a shift in thinking about the range of public information available through the NPRI and the need to collect a broader scope of data and improve the accessibility of information about the chemicals regulated under CEPA.
- Although there have yet to be direct changes to the NPRI, there is recognition that the NPRI is an important tool that can advance environmental justice and help uphold government responsibilities associated with the right to a healthy environment. However, to do so, the NPRI will likely need to be substantially strengthened with respect to its scope, reporting requirements, and validation of data used to inform communities and decision makers.

When NPRI misses pollution, communities carry the uncertainty

Keepers of the Water asks ECCC to:

- Verify reporting with independent top-down measurements.
- Publicly reconcile discrepancies, uncertainty and corrections.
- Include affected Indigenous Nations in deciding what must be measured and where to monitor.



“We are told this is all within the limits and OK but this report backs up what the communities living in these areas experience” – Jesse Cardinal, KOW

Indigenous communities should not be expected to prove the pollution twice – first through lived experience and then again because the official inventory failed to measure it

Future Directions – ER, EJ, and the NPRI

- Potential Opportunities for the NPRI:
 - Updating decision-making processes.
 - Expanding the scope of available information and accessibility.
 - Linking pollutant releases to known environmental and health effects.
 - Improving public access to and meaningful participation by communities in the collection and use of quantitative and qualitative data.
 - Assessing how to use data to undertake cumulative effects assessment from multiple sources and multiple substances from same source.
 - Community and health profiles with NPRI data (similar to NPRI reports see: [NPRI Reports](#) (substances, sectors, data integration))
- Overall, we view the NPRI as an important tool with significant potential to help advance the four tenants of environmental justice and uphold associated government responsibilities.

Questions?

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Disclaimer:

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