



WORKERS' EDUCATION AND RIGHTS COLLECTIVE

Submission on Draft National Strategy Respecting
Environmental Racism and Environmental Justice



PREPARED FOR

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Introduction

The Workers' Education and Rights Collective (WERC) thanks Environment and Climate Change Canada (ECCC) for the opportunity to provide submissions on the draft *National Strategy Respecting Environmental Racism and Environmental Justice* (Strategy). WERC welcomes the recognition that environmental racism is systemic, and emphasis on the distributive, procedural, recognition and restorative components of environmental justice (EJ).

While the Strategy represents real progress, it can be significantly strengthened to achieve its goals. WERC's central submission is that the Strategy must adopt a broader conception of environmental racism; specifically, it should be broad enough to include temporary foreign workers, a mostly racialized and highly vulnerable population.

About WERC

WERC is a federally incorporated non-profit with a mandate to empower workers to exercise their rights through legal education, information, and support. WERC envisions a community where all workers — particularly vulnerable and marginalized workers — understand and have the support they need to exercise their rights, both individually and collectively. WERC offers services to Ottawa residents and federally regulated individuals in labour, employment, human, and environmental rights.

The Strategy should conceive of environmental racism broadly

The Strategy should adopt a broad conception of environmental racism, and one specifically that captures temporary foreign workers.

WERC agrees with West Coast Environmental Law that the Strategy adopts too narrow an understanding of environmental racism.ⁱ The siting of hazardous facilities near racialized communities is a well-established form of environmental racism and must be addressed by the Strategy; however, environmental racism takes many other forms.

For example, racialized communities are disproportionately likely to experience adverse impacts from climate change. The Public Health Agency of Canada estimates that First Nations communities account for 42% of wildfire evacuations despite representing about 5% of Canada's population, and identifies colonialism, geographic isolation, and unequal access to infrastructure and services as compounding risk factors.ⁱⁱ This too is a form of environmental racism and should be addressed in the Strategy.

Temporary Foreign Workers should be included in the Strategy

Specifically, the Strategy should be broad enough to address the disproportionate environmental impacts on temporary foreign workers (TFW), including migrant agricultural workers. Many migrant agricultural workers enter Canada through the federal TFW Program, including the Seasonal Agricultural Worker Program and Agricultural Stream. These workers are mostly racialized, and have additional intersecting vulnerabilities: workers may depend on an employer for their job, immigration status, housing and transportation.ⁱⁱⁱ

Migrant agricultural workers are exposed to serious, cumulative environmental harms: extreme heat, poor air quality, exposure to pesticides and other chemicals, and extreme weather events. These risks to workers are compounded by poor housing conditions with inadequate ventilation, lack of personal protective equipment, and barriers to enforcing health and safety protections due to their precarious employment and immigration status.^{iv}

This is a highly vulnerable, racialized population in Canada, facing a disproportionate environmental burden. This population is also already subject to federal regulatory authority, and it is thus within the Government's power to take meaningful steps to mitigate the environmental impacts on these workers. The Strategy should concretely address this population.

Other ways to strengthen the Strategy

The Strategy can also be strengthened by: 1) including a binding action plan, 2) funding meaningful community participation, and 3) embedding EJ principles government-wide.

Include a binding action plan

WERC echoes the comments of other non-governmental organizations, including Amnesty International and West Coast Environmental Law, that the Strategy lacks concrete, binding commitments to action.^v The Strategy identifies “potential priority actions” and indicates that a “strategic and coordinated action plan” will follow at a later date.

As ECCC has acknowledged during consultations, outcomes are clear, measurable changes, and an outcome-focused approach is essential. Rather than limit the Strategy to a framework of potential activities, the Strategy should include a concrete action plan, including: specific actions the Government will take within its sphere of authority; responsible departments; timelines; funding; public reporting; and measurable targets of success.

Fund meaningful community participation

The Strategy should empower marginalized communities to take the lead in identifying and responding to environmental racism. This is crucial to the procedural component of EJ: the Strategy will be infinitely more credible and useful when affected communities help design the tools and determine which indicators matter, but this requires meaningful investment in capacity-building at the community level.^{vi}

WERC supports calls for stronger, ongoing participation of communities impacted by environmental racism. The Strategy should include stable funding for capacity-building, community-led research, monitoring, and data.

Embed environmental justice analyses across the federal government

To succeed, the Strategy should not be treated as the responsibility of one regulator or department.^{vii} Rather, the Strategy must be embedded in policy-making and law-making across the federal government. All government agencies and departments should have dedicated EJ offices to ensure that policy implementation is cohesive and coordinated across government programs.^{viii} WERC endorses the comments of other organizations calling for a mandatory “Environmental Justice (EJ) Analysis” across federal institutions, to ensure efforts to advance EJ by one department are not undermined elsewhere.

For example, the *Pest Control Products Act* was recently amended to remove requirements for pesticide safety data sheets, which risks leaving agricultural workers (especially migrant farm workers) with less reliable access to information about toxic properties, first aid, and chemical ingredients.^{ix} This policy change appears contrary to the objectives of the Strategy; a government-wide EJ Analysis may have called attention to the impacts of this policy change on vulnerable, racialized individuals.

WERC-CÉDT thanks ECCC for the opportunity to make these submissions.



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ⁱ West Coast Environmental Law, “Share your feedback on Canada’s Draft National Environmental Justice Strategy.” (2026) <https://www.wcel.org/blog/share-your-feedback-canadas-draft-national-environmental-justice-strategy>.

ⁱⁱ Public Health Agency of Canada, “Rapid Review: An intersectional analysis of the disproportionate health impacts of wildfires on diverse populations and communities.” (2024). <https://www.canada.ca/en/public-health/services/publications/healthy-living/rapid-review-intersectional-analysis-disproportionate-impacts-wildfires-diverse-populations-communities.html>

ⁱⁱⁱ Rajpreet Sahota , Working past exhaustion in extreme heat: migrant farm workers rally in Toronto, *The Narwal*, <https://thenarwhal.ca/migrant-workers-rally/> (4 August 2026); Matell et al., “The Point of No Return? Impediments to Return to Work for Injured Migrant Agricultural Workers in Two Canadian Provinces” (2025) <https://pmc.ncbi.nlm.nih.gov/articles/PMC11954361/> ; C. Susana Caxaj et al., “You’re Just Stuck in a Hole, Really”: Mechanisms of Structural Racism Through Migrant Agricultural Worker Housing in Canada” (2024) <https://pmc.ncbi.nlm.nih.gov/articles/PMC12056269/>.

^{iv} Sahota, *supra*; Caxaj et al., *supra*.

^v West Coast Environmental law, *supra*. Amnesty International Canada, “Canada named environmental racism as a human rights problem. Now it has to fix it,” (2026) <https://amnesty.ca/features/canada-named-environmental-racism-as-a-human-rights-problem-now-it-has-to-fix-it/>.

^{vi} Daniel Aldana Cohen et al., “Securing Climate Justice Federally: A Political Economy Approach to Targeted Investments” (2023) 16 *Environmental Justice* 351. <https://journals.sagepub.com/doi/10.1089/env.2022.0047>.

^{vii} Eric Jantz, “Environmental Racism with a Faint Green Glow” (2018) 58 *Natural Resources Journal* 247. <https://digitalrepository.unm.edu/nrj/vol58/iss2/12/>.

^{viii} Ravichandran, V.; D’Alonzo, S.; Stephens, S.; Ajith, A.; Hu, R.; Wilson, S. (2024). Holding State Agencies Accountable: The Creation of an Environmental Justice Scorecard for Maryland State Agencies. *Environmental Justice*, 17(1).

^{ix} [Order in Council P.C. 2026-0509](#), May 28, 2026. Ecojustice and UFCW Canada, “Health Canada claws back requirement for industry to provide agricultural workers access to pesticides safety information” (June 11, 2026). <https://ecojustice.ca/news/health-canada-claws-back-requirement-for-industry-to-provide-agricultural-workers-access-to-pesticides-safety-information/>