

Sustainable Youth Canada and Break The Divide Workshop Report on the Draft Implementation Framework for the Right to a Healthy Environment under the Canadian Environmental Protection Act, 1999

Written as part of the Consultation on the CEPA Right to a Healthy Environment Draft Implementation Framework



January 20, 2025

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With generous support from Environment and Climate Change Canada and Health Canada



About Us

Sustainable Youth Canada / Écosystème Jeunesse Canada

[Sustainable Youth Canada](#) (SYC) is a youth-led nonprofit with chapters across Canada, providing a platform for young people to lead and engage in environmental initiatives. We act as a gateway into environmental organizing by offering a national network of committed peers, essential tools for tackling local environmental issues, and mentorship to our members throughout the process. Youth at SYC drive various grassroots, local initiatives, such as citizen-science projects, awareness campaigns, and volunteer opportunities, while advocating for systemic changes through participation in public consultations and conferences. Our organization's mission is to engage, educate, and empower youth to become effective environmental leaders on both local and national levels.

Break The Divide

[Break The Divide](#) (BTD) is a Canadian youth-led non-profit empowering young people to navigate the emotional impacts of climate change by fostering connection, dialogue, and community engagement. BTD supports youth in transforming their climate emotions into empathy, resilience, and collective action.

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Executive Summary

This report synthesizes youth feedback on the [Draft Implementation Framework for the Right to a Healthy Environment under the Canadian Environmental Protection Act, 1999](#). It offers actionable recommendations to strengthen the Canadian Environmental Protection Act's approach by improving environmental justice, intergenerational equity, and reasonable limits, while addressing gaps in the proposed framework. The insights in this report were compiled by Sustainable Youth Canada and Break The Divide based on sixteen workshops and roundtables which engaged 295 youth across nine provinces in 2024. During these workshops and roundtables, youth learned about the Canadian Environmental Protection Act, and then answered questions about the right to a healthy environment and concepts in the proposed framework during a gamified case study activity.

Youth emphasized the importance of clearly defining the right to a healthy environment. They called for the integration of scientific and Indigenous knowledge, the establishment of environmental health standards, and a focus on protecting populations disproportionately affected by and vulnerable to pollution. Participants also highlighted the need for transparent and public consultations, and suggested the development of educational resources to empower affected groups to engage in management processes. Youth also made key suggestions on how the new right to a healthy environment online portal can be accessible and informative.

We identify key mechanisms throughout the Canadian Environmental Protection Act's management cycle which youth felt would help operationalize the right to a healthy environment. These include improving transparency in reporting, enforcing guidelines against greenwashing, applying the precautionary principle, and implementing robust enforcement mechanisms such as economic sanctions and mandatory community compensation. Regular policy evaluations and stakeholder education were also identified as essential components to ensure accountability.

The concept of reasonable limits was viewed as critical, requiring a balance between environmental and economic considerations. Youth proposed clear guidelines to prevent potential loopholes for polluters, including the adoption of best practices, respect for Indigenous rights, and equitable distribution of industrial activities to address environmental inequities.

Environmental justice emerged as a key theme, with youth understanding the importance of supporting populations disproportionately impacted by pollution and those facing systemic vulnerabilities to it. Intergenerational equity was strongly supported as a guiding principle of the framework, with recommendations focusing on explicit protections for future generations.

This report underscores the importance of youth perspectives in modernizing the Canadian Environmental Protection Act, by creating a right to a healthy environment framework that is equitable, future-focused, and aligned with Canada's sustainability and justice promises.

Introduction

SYC and BTD reviewed the [Draft Implementation Framework for the Right to a Healthy Environment under the Canadian Environmental Protection Act, 1999](#), hereby referred to as “the framework”, and have compiled this report based on our organizational knowledge and feedback from youth across the country. This report was written as part of the public consultation period for the framework and was made possible with funding from [Environment and Climate Change Canada](#) (ECCC) and [Health Canada](#) (HC). In this report, we will refer to the Canadian Environmental Protection Act, 1999, as “CEPA”. The right to a healthy environment under CEPA will also hereby be referred to as “the right”.

Methods

To create this report, SYC hired two members part-time during the fall of 2024 to develop a comprehensive consultation workshop for youth, breaking down information about CEPA and the right. The members conducted a literature review and held internal inquiry sessions to understand the policy, then coordinated with existing SYC chapters, partner organizations, and high schools to develop and host workshops to ground these concepts in real-life examples. BTD also hired two members part-time during the fall of 2024 to engage with education stakeholders across Canada and generate workshop consultation guides related to mental health and wellbeing. Throughout the development process, HC and ECCC employees met with the SYC and BTD team to help work through some of SYC and BTD’s questions.

This report is complemented by [SYC’s internal report reviewing the details of the framework](#), and BTD’s internal report on youth mental health and Regina roundtable report. Additionally, Annex 2 includes a summary of results from the teachers roundtable, which were not included in the analysis for the main part of this report since participants were not all youth.

SYC and BTD held **sixteen workshops and roundtables** online, in high schools, and in community centers, engaging youth from **9 provinces** (Newfoundland and Labrador, Prince Edward Island, Nova Scotia, New Brunswick, Quebec, Ontario, Saskatchewan, Alberta, and British Columbia) during November and December 2024. Seven workshops were in-person in Quebec, five were held in Ontario (two of which were online), one was online in Atlantic Canada, one roundtable was in-person in Saskatchewan, and one had participants online from across Canada. Montreal’s SYC chapter also led a local field trip to explore a new proposed industrial development called [Northvolt](#), between McMasterville and Saint-Basile-le-Grand, QC to accompany their workshop. Roundtable events included the same content as the workshops but also had more time for youth to discuss the framework and their experiences with each other. In total, **295 youth** were engaged in our consultations. The majority of participants were in high

school, between the ages of 15 and 16, but youth as young as 13 and as old at 30 participated in the various events.

Gamified Workshop on the Right to a Healthy Environment

Our workshops were informative, accessible, age-appropriate and entertaining. They began with an introduction to CEPA and the right, reviewing pollution across the globe and the history of environmental protection. See Annex 1 for a one-pager description of the workshop. **The workshop materials are also accessible online at the [following link](#).** Educators can contact SYC for facilitation of the workshop in their own classrooms. After an overview of the main concepts of the framework, youth were split into five groups for a case study activity. Each group had between two and seven people depending on the size of the class.

Each case study included questions inviting the group to reflect on the different concepts laid out in the framework. The case studies explored how youth would respond to environmental damage in their communities, and what interventions they would expect and want out of industry and government. The youth answered as a group and then shared their answers with the rest of the class. At the end of the workshop, they could choose to keep their working document if they did not want us to include their responses in our report, or to return the document back to us. We transcribed all returned answers and coded them thematically. *Green, italicized text indicates direct quotes* drawn from the youth workshop answers.

The charts in this report under Section 1 and Section 7 are based on introductory questions where youth answered questions individually on sticky notes. We started the workshop by asking youth if they felt they lived in a healthy environment and why, after which we asked which groups they felt were more vulnerable to or disproportionately affected by the effects of pollution, before dividing the class into subgroups for the case studies. The values on these charts represent the number of individual answers mentioning a certain theme. At the roundtable events, youth were also asked to describe what a healthy environment looked, felt, sounded, smelled, and tasted like, and these answers were included with the question describing why youth felt they lived in a healthy environment. All other figures in this report are based on group questions posed during the case study activity. The number of responses in these figures represents the number of groups with answers about that topic, which could represent multiple youth each, depending on the size of the class participating.

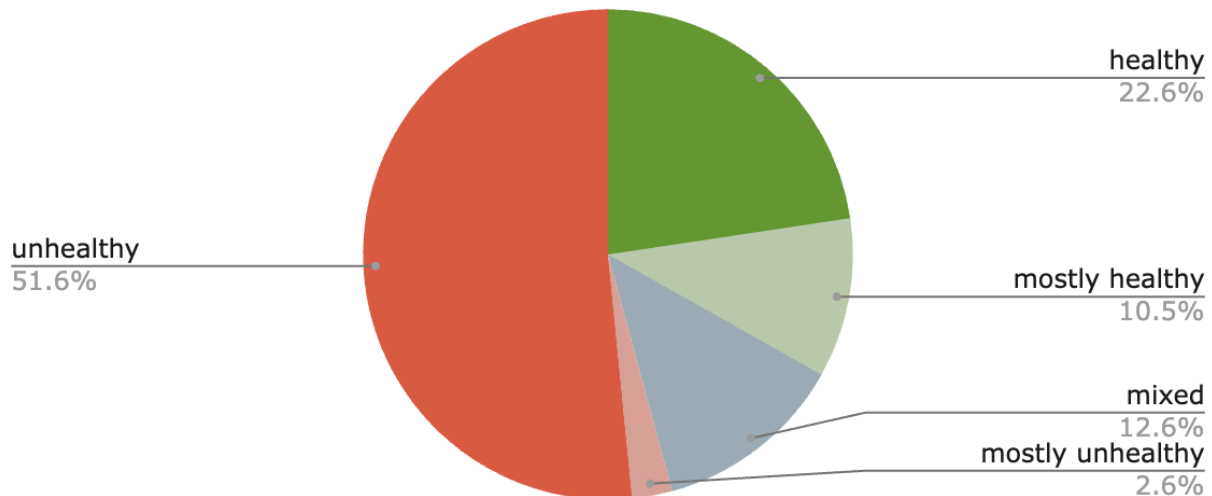
While we engaged 295 youth total in our consultations, there was variability in the number of answers for each question. Youth were encouraged to have agency over whether or not they would like to participate in our consultation and to exercise their right to choose which answers they would like to submit within the scope of this consultation, leading to some questions having more or less responses. Moreover, since the case studies were answered in groups, the number of individuals answering each question is not known.

Results

1.0 The Right to a Healthy Environment

The knowledge of what a healthy environment is is key to understanding if the right is being upheld. At the beginning of the workshop, all youth were asked if they felt they lived in a healthy environment (Figure 1). Despite Canada’s claims of being an environmental leader, **slightly more than half of youth believed they lived in an unhealthy environment, demonstrating a need for improved environmental health and protection.**

Figure 1. Do you live in a healthy environment?



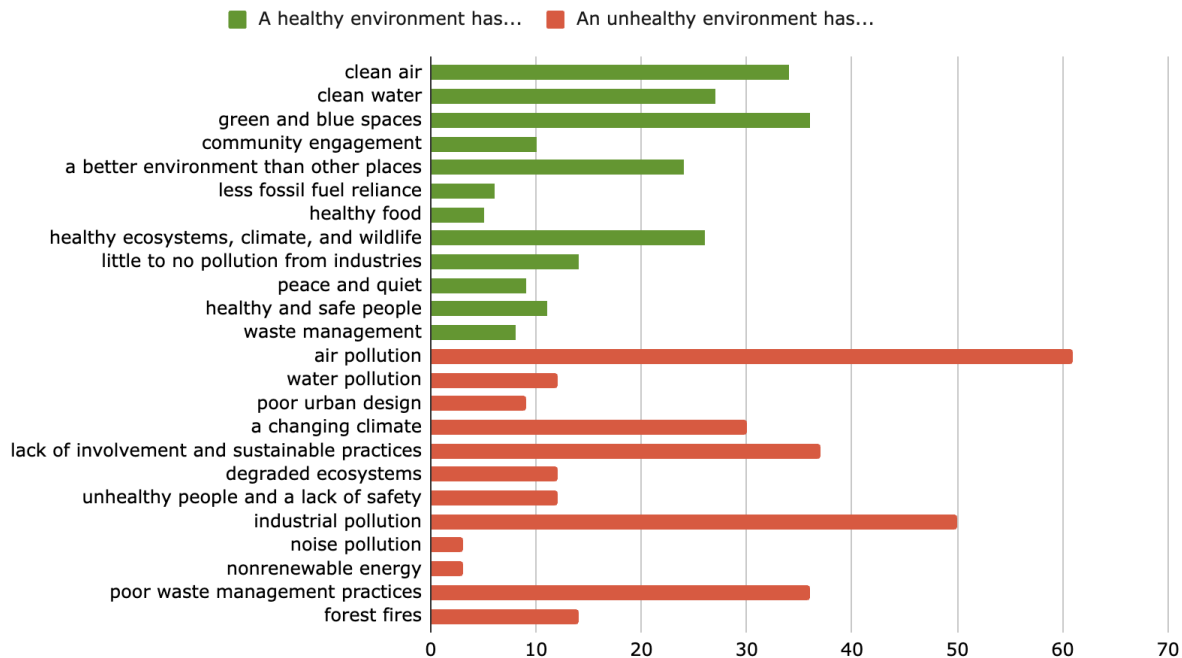
The majority of youth (51.6%) responded that they felt their environment was not healthy (Figure 1). Although responses were mixed, overall, it was clear that Canada has a long way to go in terms of environmental protection. Many youths also pointed to the aspect of *privilege*. Even if they felt that they lived in a relatively healthy environment, this was only because of their social privileges (economic, racial, etc.). Many participants expressed awareness that their peers may not have the same experience of the environment as them and that although Canada’s environment was not completely healthy, it was doing relatively well compared to other countries. **This points to the importance of environmental justice in considerations of the right**, as explored more in Section 7.0 of this report.

1.1 The definition of a healthy environment

The definition of a healthy environment provided in Section 2.1 of the framework does not explicitly state what constitutes a healthy or unhealthy environment, beyond “clean and healthy air and water”, “a sustainable climate”, and “healthy ecosystems and biodiversity”. **When we**

asked youth to define a healthy environment, they provided a more holistic view (Figure 2). We suggest that ECCC and HC incorporate these concepts into their definition of a healthy environment, and update the wording in Section 2.1 of the framework accordingly.

Figure 2. What are the elements of a healthy and unhealthy environment?



Respondents said a healthy environment has clean air, clean water, green and blue spaces, community engagement, a better environment than other places, less fossil fuel reliance, healthy food, healthy ecosystems, climate, and wildlife, and little to no pollution from industries (including the absence of or distance from industries), peace and quiet, healthy and safe people, and waste management. Conversely, an unhealthy environment has air pollution, water pollution, poor urban design, a changing climate, lack of involvement and sustainable practices (including overconsumption, and lack of resources and supports), degraded ecosystems, unhealthy people (including drug addiction and mental health), a lack of safety, industrial pollution, noise pollution, nonrenewable energy, poor waste management practices, and forest fires.

The youth had many responses that expanded on what “clean air” could mean in the framework. They pointed out clean air is *free of pollution and CO₂ [carbon emissions]*, that it *smells fresh*, and that it *lacks smoke or car exhaust*. **Many youths who felt they did not live in healthy environments felt so because of worsening forest fire seasons.** As some youth put it, this is one of the most noticeable and concerning impacts of climate change they see in Canada.

“No, our air, soil and especially our water are very polluted. In Montreal a few years ago, we had orange and yellow air and we couldn't breathe well outside.”

“Over the summer, there is somewhere in Alberta called Waterton Park near BC. There were a lot of dead trees. It was shocking to see that the majority of trees were dead. Likely from a forest fire.”

“[In Calgary,] the biggest challenges are when there are forest fires in BC that blow smoke in and they are not allowed to go outside.”

We suggest that the framework **include reasonable protection from climate change impacts like forest fires in the definition of the right**. We also suggest the framework's definition of **“clean water” include water bodies free from industrial run-off, and access to clean drinking water for everyone in Canada**. The framework's definition of “sustainable climate” and “healthy ecosystems and biodiversity” should also **incorporate wildlife**. A common theme in responses was to point out that a healthy ecosystem includes the sounds of nature like *birds singing*. In regards to biodiversity, youth pointed out the need for environments to have *local animals*, so we suggest incorporating native biodiversity into the definition. Section 1.5.1 of SYC's internal report expands on these concepts and provides additional suggestions for the definition of a healthy environment.

Infrastructure and human behaviour were also commonly mentioned in youth responses. According to youth, a healthy environment has *community building, environmentally friendly practices, conservation, walkable neighbourhoods, green and blue spaces, and public and active transit*. Unhealthy environments rely on fossil fuels and have *car-centric urban design, oil and gas* industrial development, and *noise* pollution. Human health was also highlighted in responses. Healthy environments had *healthy food options*, and people in general were happy, **without suffering impacts to their mental and physical health**.

2.0 Access to Information

We asked the youth three questions related to access to information in the context of their case study. We wanted to know what information they would need in order to know if they lived in a healthy environment, and where they thought that information might be available, if at all. Finally, we introduced the online portal proposed in Section 8.0 of the framework and put them in charge of designing the website so that it would resonate with them best.

2.1 What information should be accessible?

In order to consider that their right to access to information had been fulfilled, youth required four types of information: 1) information on the toxic substance in their environment, 2)

on the negative impacts of the toxic substance, 3) general information about the project and company using the substance, and 4) information on how they would be protected from harm.

The types of information on the toxic substances that youth would like to see are similar to what is found on the [National Pollutant Release Inventory](#) (NPRI). Youth want to know *how the materials [toxic chemicals] are being used, sourced, and disposed of*, and *what chemicals are released and how much* (Figure 3). Section 1.1.5 of SYC's internal report offers suggestions to improve the existing NPRI to make it more accessible.

Negative impacts highlight how toxic substances are **affecting our natural environment** (ecosystems and planetary climate change) and **our social communities** (health, culture and wellbeing) (Figure 4).

Figure 3. Toxic substance information

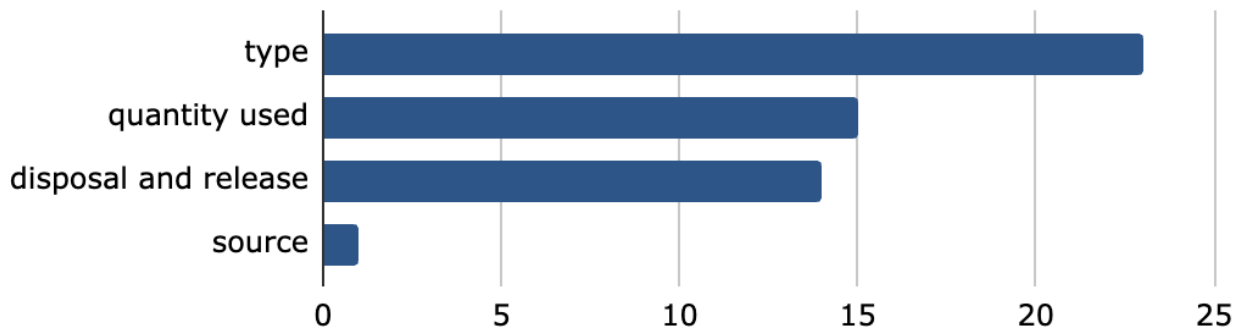
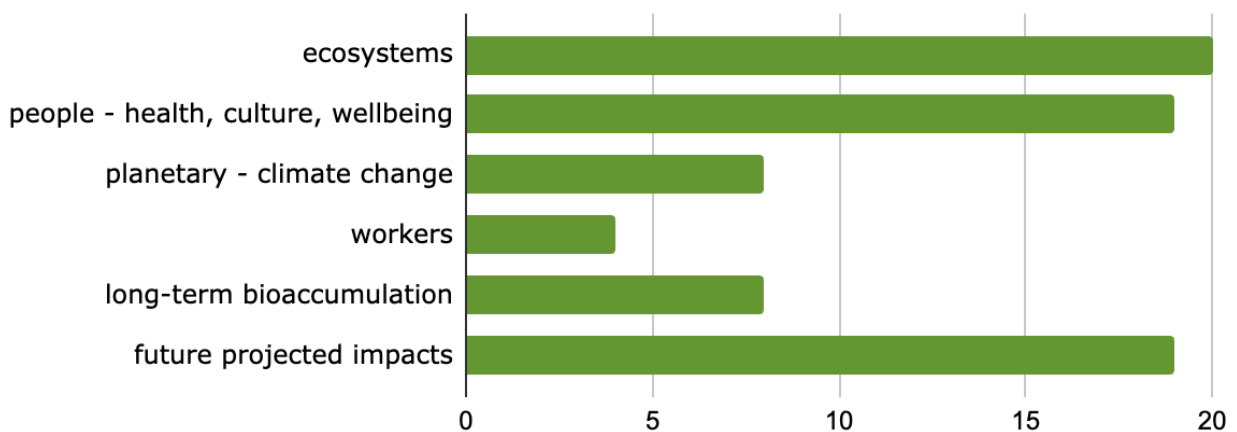


Figure 4. Negative impacts of toxic substances

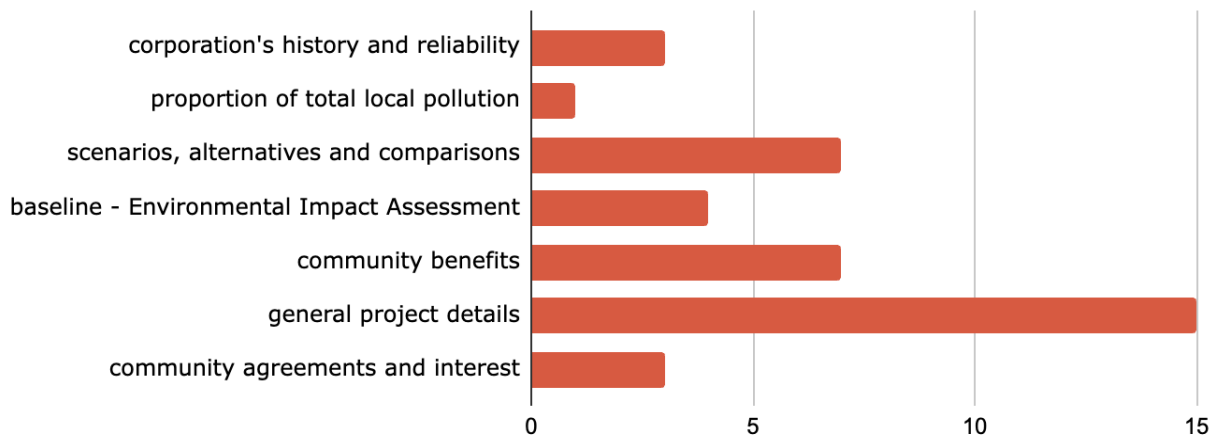


Youth asked questions such as: *Who is the pollution impacting most? What are the impacts on environmental and human health as a result of these specific pollutants? How will this action significantly harm the environment and traditions? Will this impact future generations?* They wanted to have information on *contamination and bioaccumulation* and the *impact on the planet (global warming) [like] GHG [greenhouse gas] increase [with] statistics per year.*

This information is not something that is currently easily accessible on the CEPA website. Bits of information can be accessed through the [List of Toxic Substances](#), but the units and format of reporting are not standardized for all substances and require digging through technical documents. Moreover, a lot of important decisions and consultations are made before a project starts. **There is thus an interest not only in ongoing pollution from existing facilities but also in projected future emissions from potential projects.** We suggest that the portal should seek to address that issue by including a list of upcoming projects and information on their impact, like through Environmental Impact Assessments.

Youth also felt that there was a need for **a broader context** about toxic substances to be accessible online. Toxic substances on their own are very abstract to most people, and especially in the context of a consultation, they need to be attached to the specific, tangible impact they could have on a community. It would be relevant to explain what the toxic chemicals are used for, and other general information such as *the project duration, the project location, scale, neighbouring communities, and areas that will be affected by the project* (Figure 5).

Figure 5. Contextualizing pollution

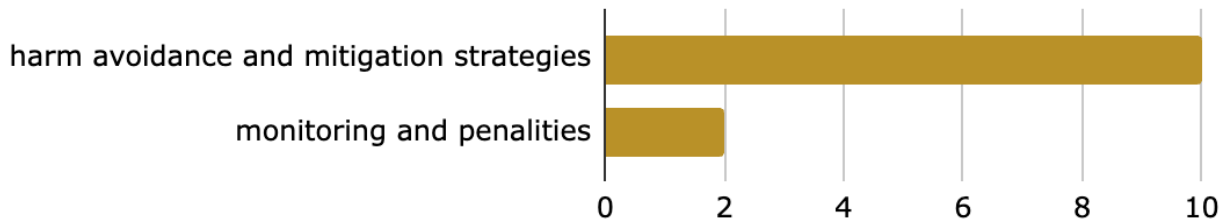


When new projects are being proposed, youth want to know the opinion of nearby communities on support for the project and its benefits. They also want to know if the corporation overseeing the project has a good reputation or a history of toxic spills and penalties. *What were existing alternatives (better or worse)?* was also a central question for youth regarding the necessity of a project. **Only with a solid overview of a situation can they make enlightened, meaningful decisions.**

Lastly, youth wanted to know what was being done to **protect them and their environment** from the potential harm of these chemicals (Figure 6). **This responsibility should be shared by the government** – *What policies are being followed by the company? [What are] consequences if [emissions] are too high? and by industry* – *are there plans to control/limit pollution? Do they have a plan to reduce their waste soon?* Broadly, they wanted *information on*

security measures. This information should also be readily available in an easily legible format on the portal.

Figure 6. Protections for people and the environment



2.2 Where to find this information?

Youth seek information from a variety of sources and platforms, so it’s important to consider these different ways of communicating when trying to reach them effectively. They generally expect to find information from governments (at all levels), industries, and external actors like scientists, journalists, and nonprofits. This includes things like school workshops, news outlets, and even platforms like Wikipedia.

All three levels of government were mentioned as key sources—youth expected to find information through *government reports, websites, land registry offices, and town halls.* However, much of this information is not always easily accessible, forcing the public to fall back on legal tools such as the *Freedom of Information Act* to find details that aren’t readily available. A good example of such a situation is laid out in Section 1.3 of SYC’s internal report with the Northvolt case study.

For industries, transparency is key. Youth want companies to have clear, easy-to-find contact options, including *websites, emails, phone numbers, and the ability to speak directly with the industry [...] managers and employees.* Companies are expected to go beyond just having a website and **engage directly and transparently with the public to build trust and strengthen the health of the environment.**

Social media is an important tool, as both governments and industries can use it to directly connect with youth. Many youth specifically mentioned that social media platforms like Instagram or TikTok should be used to communicate directly with them. Third-party sources such as news articles, school workshops, Wikipedia, and citizen science initiatives also play a significant role in the information youth rely on.

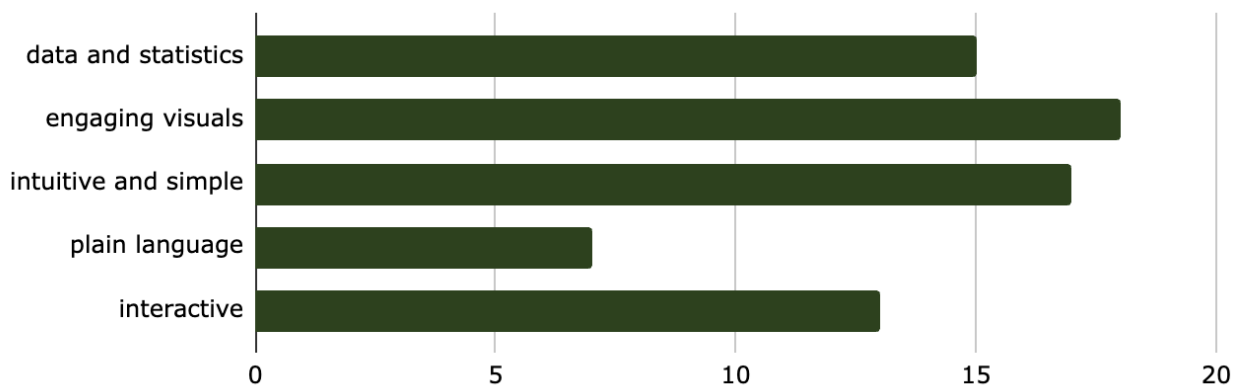
The many forms of media resources youth access for environmental information show that a **centralized online platform could link federal government resources to existing platforms at the local government, industry, and vetted non-profit levels.** This would help

address the issue of **fragmented information** that unfolds across many online sources, making it easier for youth to find reliable information on the right in one place.

2.3 The New Right to a Healthy Environment Online Portal

Section 8.0 of the framework introduces a new CEPA right to a healthy environment portal on the CEPA Registry, which we see as the logical centralized online platform for the information mentioned above. We would like to see Section 8.0 of the framework include more details on what the portal will look like. It is important that the framework be clear on accessibility measures that can be taken on the portal so that it is understandable by all members of the public.

Figure 7. What should the right to a healthy environment online portal look like?



When given the task of designing the CEPA portal to make it interesting and accessible, the youth came up with a wealth of brilliant ideas (Figure 7). First, **the portal should emphasize important data using interactive graphs, maps and statistics**. To keep youth engaged, the interface needs to have **engaging visuals, including infographics, photos, videos, animations, and colours**. Moreover, navigation needs to be intuitive, and *easy to access, find, and navigate* using, for example, *search* and *help functions*. **The text needs to be summarized in easy, plain, and concise language**, with subsections for those interested in obtaining more information. The portal should aim to *get to the point clearly and quickly* and *present data in a way where people understand the impacts first*.

“In reality [it is] very hard to find information on [...] government websites, [they] have a lot of dense text that is difficult to understand, [the] language is not approachable.”

We would like to see the CEPA portal go beyond the current norm in government websites. Particularly to enable participation in decision-making and access to remedies, a unique feature of this portal should be its interactivity. See section 3.1 for a breakdown of ways to make this portal interactive, beyond providing visitors with an email address contact.

3.0 Access to effective remedies in the event of environmental harm

Youths were not certain how they could access remedies through CEPA. We feel that the framework should lay these out in clear wording so that anyone impacted by environmental damage would have the opportunity to achieve justice. In the workshops, we explored how to submit concerns and access remedies through the new email for the right, the government's responsibilities to provide remedies, and the kind of remedies that youth want to see made available.

3.1 Making the portal more interactive to enable public questions and concerns

We are encouraged by the inclusion of the new dedicated email address for the right as laid out in Section 8.0 of the framework. However, as discussed in Section 1.2.2 of SYC's internal report, youth still want more transparency on how their concerns will be addressed.

How can the new portal and email be made interactive so that remedies can be accessed?

Although the youth expressed that email is a positive inclusion of the framework, they were adamant that there should be a good process for receiving and sending responses. Youth want a guaranteed response, proof of reception, and the possibility of action truly coming out of their email (i.e. having the CEPA management cycle activated in response). The framework should also **outline a timeline** which specifies how long government officials have to respond to an email (for example, within 30 days) and how long they have to decide whether to *take action* related to the request (for example, within 90 days). Certain groups also mentioned that they would like to **be able to request a meeting in person or virtually with government officials through email.**

Moreover, an email and online portal should only be the start of engaging communities on their new right. Youth came up with a dozen different strategies to make the portal more interactive. As highlighted in Section 3.0 of this report, youth mentioned that it is *extremely important to have multiple channels of communication*. Some examples from the youth that we suggest the framework incorporate are:

- *A form to collect questions, opinions and concerns.* This was the most popular among respondents (six groups). We suggest that this could be an alternative to the email because its structured format is more approachable to youth, and better guides their concerns so the response requested by the government is clearer to the receivers of the form results as well.
- *A discussion forum,* where the public or external experts can participate in a discussion about the right, and where government officials also answer questions about CEPA

processes. This would avoid having many people asking the same questions repeatedly since existing answers would be visible to all interested.

- A *telephone helpline*, for more immediate responses. One respondent also mentioned a *help center bringing together environmental professionals* (which could either be government officials or third-party individuals) to give immediate assistance to anyone in need. This goes along nicely with the third-party mediator for crisis response suggested in Section 1.2.3 of SYC's internal report.
- A *chat function* on the online portal. Two groups even suggested the use of an artificial intelligence chatbot. Considering that navigating CEPA is one of the main barriers to access to information, artificial intelligence could help to more easily navigate the mountains of hidden information and extract what is relevant to a concerned citizen. Educational platforms like AlloProf use AI chatbots, and youth mentioned that they found it helpful in those contexts.
- *Polls, to easily engage the public directly on the portal*, the *ability to comment on articles*, a question and answer section with answers to frequently asked questions, and *monthly virtual meetings* where people can raise issues with government officials.

Beyond discussing concerns with the government, two respondents also mentioned that the portal should **provide the contact information for company spokespersons** for all corporations that deal with toxic substances so that anyone concerned can contact them directly. Although this information is published on the NPRI website, it would be helpful if it was also included in the new portal. Additionally, we suggest that the framework **outline clear guidelines for how companies should respond** to such communications, with a timeline for responses or other support to ensure that adequate response is given.

3.2 The government's responsibility to provide remedies

Youth want the framework to outline better access to remedies in cases of environmental harm. As explored in Section 1.2.1 of SYC's internal report, non-legal pathways for members of the public to access remedies are currently unclear.

What is the government's responsibility to provide remedies to impacted communities?

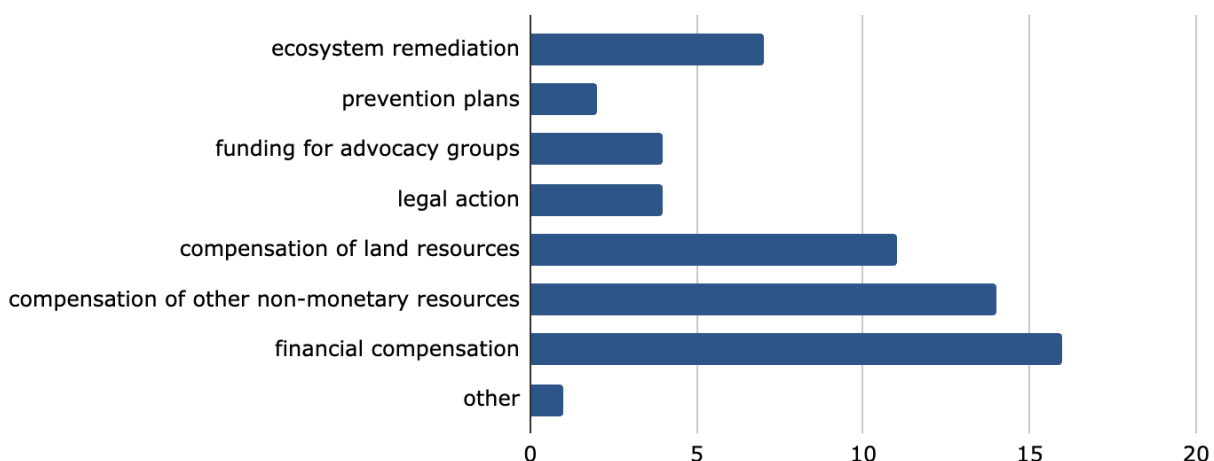
Youth suggest having an *unbiased ombudsman or third-party organization* through which they can access environmental information and remedies directly (see Section 4.1 for more detail). They would like to be able to access financial *compensation programs*, submit and view *evidence* that describes impacts on environmental and human health they have experienced, warn their neighbours about potential threats, access government representatives immediately, and have options for legal action made clear to them. Additionally, the government should facilitate community connection to *heal generational impacts*, bringing together the community

for healing. We suggest that the framework include these under the mandate of a third-party mediator. Facilitating community healing is crucial in addressing the deep trauma caused by environmental harm, as it allows individuals to reclaim agency and move toward collective resilience. This healing can occur through facilitated local discussions, where community members can share experiences, express emotions, and begin to rebuild connections with each other and their environment.

3.3 Improved remedies

To expand on Section 1.2.1 of SYC’s internal report, **the framework currently does not give enough guidance on how a member of the public can access existing remedies in the event of environmental harm**, despite this being a major concept of the right. Remedies are also very limited, and the only accessible remedy that is clear in the framework is legal action. Youth have many suggestions for non-legal and legal remedies that should be available to the public, which we suggest the framework adopt (Figure 8).

Figure 8. What are examples of remedies you would like to see made available?



The most popular response was financial compensation. We suggest that the framework **explicitly outlines how the right will impact administrative monetary penalties (AMPs)** given to CEPA violators (see Section 1.2.4 of SYC’s internal report for more details). Currently, AMPs are paid by the violator, and we suggest that **a certain percentage of each AMP be distributed to impacted communities in the case of environmental harm**. These would go towards compensation of *lost profits* or *wages* due to contamination or simply give impacted people a lump sum for damages. Additionally, youth would like to see impacted employees of these violating companies have their *wages increased* if they are at risk of any health impacts.

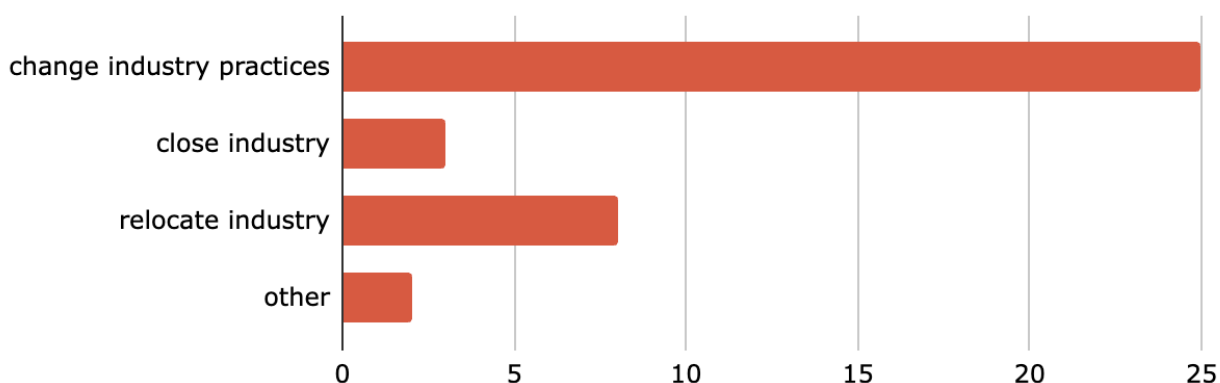
Along with financial compensation, respondents said that they would like industries to compensate impacted individuals by **providing them with non-monetary resources**. This could look like purchasing any *leftover* or *unusable crops* after contamination, *providing healthcare* to

anyone experiencing adverse health effects, *replacing belongings* that had to be disposed of for safety purposes, and *providing resources for people to turn to another livelihood* if their ability to work has been impacted. Moreover, when land contamination occurred, youth suggested that industries should have to compensate impacted landowners by *buying them new, uncontaminated land nearby*. We suggest that the framework outline **a new CEPA instrument that would allow impacted individuals to access these non-monetary remedies directly from environmental violators of the right**. This would cut down on the administrative duties of CEPA officers, and allow individuals to access remedies immediately following environmental harm.

Youth also mentioned ecosystem *remediation*, prevention plans, and funding for advocacy groups (e.g. companies or government pay for environmental experts to do research and monitoring, or giving resources and information to communities) as potential remedies. We suggest that the framework explain how each of these remedies could be accessed by a concerned member of the public.

In the case of environmental damage, youth also suggested that the industry be mandated to change their behaviours (Figure 9).

Figure 9. What should happen to violators of the right?



Twenty-five respondents suggested that violators of the right should have to change their practices for the better. This includes *diverting waste products*, adding more pollution collection methods (e.g. *air filters* and *water filters*), *improving machinery*, *lowering production* or *reducing hours of operation*, and *investing in green technologies*. Escalation of consequences in the event of noncompliance could include relocating the industry *away from people* and even *closing* the industry as punishment. We suggest that the framework **adopt these escalating measures and implement clear consequences** for the industry when environmental harm is done and the right is not respected.

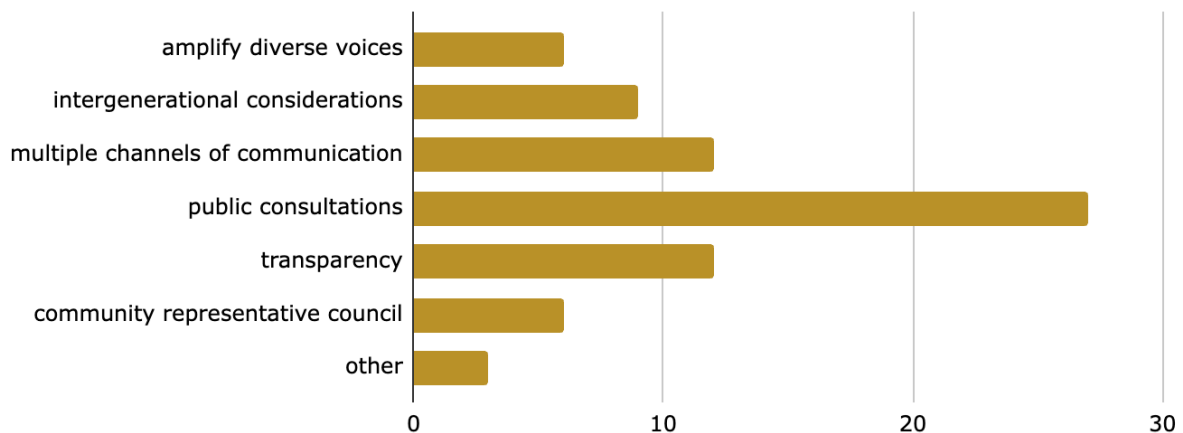
4.0 Participation in decision-making

Participation in decision-making is an essential procedural element of the right. By participating in our workshop, the youth had the opportunity to participate in the public consultation hosted by ECCC and HC. They shared with us insights on how industry and government could best continue to reach their community, an important component in making participation in decision-making accessible for all.

4.1 Engagement and consultation outside of the CEPA portal and email

While we are encouraged by the inclusion of the online portal and new email dedicated to the right mentioned in Section 8.0 of the framework, we feel that there are more ways that the government and industry can engage affected communities when new developments are proposed, or when environmental damage has occurred. We suggest that these channels proposed by youth be explored to better uphold the right (Figure 10).

Figure 10. How can the government or industries engage your community better?



Youth would like to see more of an effort be made to include diverse perspectives and voices in public consultations. They suggested that there be *open communication* between different stakeholder groups and that a government should be *valuing the difference in opinions* so that *everyone's voice is heard*. Six groups also mentioned that they would appreciate a **community council** of *diverse community leaders* who could bring their community's concerns to the government and industries. We recommend that the framework suggest ways to implement this in the CEPA management cycle when new projects are being assessed for risk and during project performance evaluation. Youth also highlighted the need to include *Indigenous ways of knowing* in these public consultations. It would be important that both youth and local Indigenous groups be represented in the proposed community councils.

In order for youth in particular to be included, there should be a **focus on generational considerations when making public consultations**. This includes **allowing elders and youth to exchange wisdom** and reach out to youth in a way that is accessible to them. We suggest that **CEPA policy-makers communicate with schools in impacted areas** when there is a need for public consultations. This is the most accessible way to reach youth.

"I believe that there should be a representative from the city or organization that can answer any questions (in an unbiased manner) and can be reached by youth. As this affects all youth in the community, schools should hold assemblies where this spokesperson can present all of the data, potential actions being taken to reduce harm, and how the students can be involved. With regards to involvement, there should be multiple channels, so both online and in-person."

The above quote highlights that many youths requested that there be increased transparency during public consultations. It is clear that youth are skeptical of the information presented by both industry and government, so we suggest that there be a third-party organization in charge of *unbiased reporting*. A similar mechanism is proposed in Section 1.2.3 of SYC's internal report for responding to environmental damages. We suggest that crisis response communication and reporting be included in the mandate of this **third-party ombudsman**.

Youth also would like to see multiple channels of communication be open to them. They expressed that there should be options for *virtual meetings*, *drop-boxes*, *door-to-door* communications, *posters*, and *advertisements* on public transit when communication with the public is necessary, such as during the proposal of a new project.

"Some people don't like to go to meetings or aren't involved"

We suggest that **more effort be put into reaching youth who are not already involved**. Especially as Section 4.2 of the framework specifically mentions opportunities for children and youth "to participate in CEPA decision-making processes", we feel this is within the mandate of CEPA and the framework. Funding projects like these workshops and roundtables allow youth to be engaged by their peers in an approachable way. It allows for diverse voices to be consulted, instead of the same groups and people who self-select to be considered for participation in all ECCC and HC consultations. Our method of going to schools and hosting community events breaks down these barriers to allow any youth to be consulted. Supporting youth participants with honoraria or transportation support, or by going directly to schools reduces barriers to participation. This is explored in more depth in Section 1.4.2 of SYC's internal report.

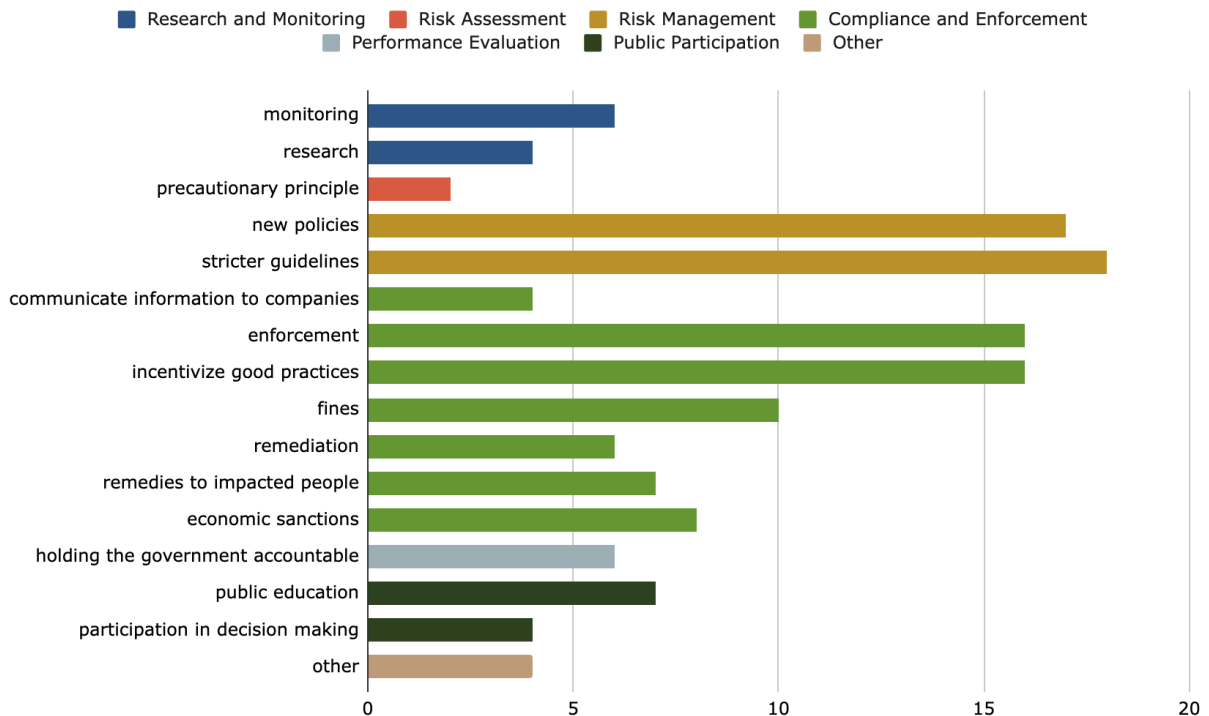
5.0 The CEPA management cycle

Annex 1 of the R2HE framework gives some examples of CEPA mechanisms to support the protection of the right. We suggest that the framework change the wording of this section to include *when the right has to be implemented*, and not just *where it could be implemented*. For details, see Section 1.3.1 of SYC’s internal report.

5.1 Examples of CEPA mechanisms to protect the right

Additionally, in Annex 1 of the framework, we suggest that more examples be given of concrete, explicit ways that the right will be considered in the CEPA management cycle. Youth thought of many **examples that fall under every section of the cycle** (Figure 11).

Figure 11. What are CEPA mechanisms that could support the right?



For each section of the CEPA management cycle, youth suggested the following examples of mechanisms to support the right, which we suggest be added to Annex 1 of the framework:

- Research and Monitoring
 - Research the impacts and history of pollution on human and environmental health;

- Monitoring what companies pollute, promoting clear transparency in reporting the causes of pollution, and enforcing strict guidelines to avoid companies *greenwashing* their reports;
- Risk Assessment
 - Use the [precautionary principle](#) when assessing new substances, and looking specifically for impacts on future generations;
- Risk Management
 - Create new policies like a *carbon tax*, *cap and trade* systems, *rebates* for good behaviour, *waste management* policies, greenwashing laws, production quality laws that make a company *responsible for the lifespan of [a] product*, or limiting operating hours;
 - Have policies reflect the size of the violator company and its profits;
 - Create stricter guidelines for pollution, including incremental plans to reduce pollution, and *relocation* of the facility if necessary;
- Compliance and Enforcement
 - Give more information to companies on what they can do to stop pollution, education on best practices, and potential solutions;
 - Enforce *holding companies accountable* for their actions *even when it hurts* their bottom line, enforcing the current guidelines and regulations, and limiting waste;
 - Incentivize good practices by investing in *green technology*, and supporting companies to change their behaviours when possible;
 - Fine companies heavily when they violate the right;
 - Remediate land and water at the company's expense if there is environmental harm caused to the terrain;
 - Give remedies to impacted communities at the polluter's expense, via monetary compensation, *paying for food or healthcare*, paying to relocate impacted homes, and recovering any lost income;
 - Sanction violators economically by making them pay *extra taxes*, removing any government support for their operations, restricting the *import/export of [their] polluting resource*, reducing the price of their product, or shutting them down;
- Performance Evaluation
 - Hold the government accountable to future generations for its actions and inactions, shifting guidelines when they are not shown to reduce impacts, and *disentangling government from industry*;
- Public Participation
 - Educate employees on risks and new development projects so that they are aware of what their companies are doing;

- Encourage participation in decision-making by holding *public consultations*;
- Other
 - Build more *green facilities* to support CEPA activities.

In regards to holding governments accountable to future generations, one respondent summed up the feelings of wanting the government to protect the environment now, for us and for those that come after us:

“Dear Government, I am a student who would like that in the future children will not have to breathe all this toxic gas. We don't want promises, we want actions [...] that take us into consideration. Kind regards, a student.”

We suggest that the CEPA management cycle reflect this desire for environmental protection to provide lasting impacts on our communities.

6.0 Reasonable limits

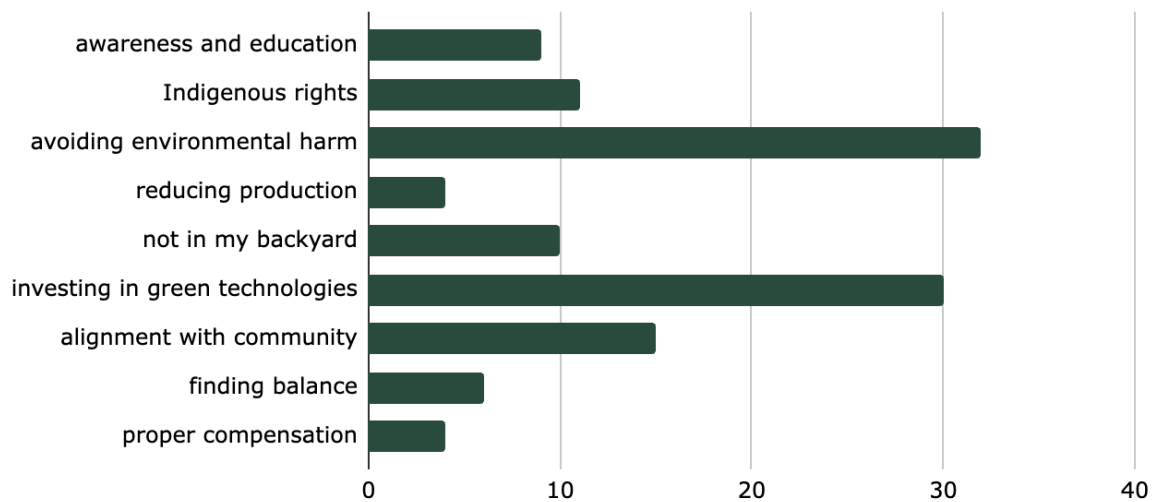
Youths understand that reasonable limits must apply to any law or policy. In general, youth expressed that industries that were working to reduce their pollution should be given more leniency when CEPA should hand out consequences, because they understood that reasonable limits do apply, and were thoughtful when brainstorming considerations to creating reasonable limits. However, they stressed that these limitations must not provide *loopholes* for companies to continue polluting *under the radar*.

6.1 Examples of reasonable limits

In the creation of reasonable limits, youth found that **avoiding environmental harm was most important** (Figure 12). Although most believed that limiting pollution to zero would not be possible, a few respondents did indicate that no pollution should be allowable. Companies should have to follow guidelines, treat their waste, and use less harmful materials.

We suggest that the framework explains that using best practices and investment in initiatives with environmental benefits can help make toxic impacts more minimal, acceptable and worthwhile. Positive initiatives include *conservation programs, up-to-date appliances, green technology, charitable donations for environmental organizations, training for sustainable practices, eco-friendly design*, or other workplace culture activities like *“Environment Days”*.

Figure 12. What might constitute a reasonable limit?



These types of initiatives *reinvest in the community using company resources*. As one respondent put it, we can always *work together*. The best way to balance interests is to consult the community on shared priorities, set attainable goals, and give credit when companies do good work.

"[We should] bridge gaps by building human-to-human relationships instead of corporation in community."

Beyond this, youth suggest that in creating reasonable limits, the framework could encourage the implementation of:

- Awareness and education programs which also increase transparency and reporting;
- Respect Indigenous Rights by using Indigenous Knowledge, and incorporating free, prior, and informed consent in consultations with Indigenous communities;
- Policies to reduce production and consumption;
- Considerations of “not in my backyard” thinking, to relocate industry to where there are fewer people, and examine if any marginalized groups are being negatively impacted by pollution due to the location of industry;
- Compensation programs to reimburse impacted people or raise the salaries of high-risk workers.

We suggest that **these considerations be used to create a list of potential reasonable limits** to add to Section 5.0 of the framework, to guide CEPA officials on what can be considered

reasonable and unreasonable. Section 1.5.2 of SYC’s internal report also expands on this, and Section 1.3.2 proposes a new Cost-Benefit Analysis to suggest how scientific, economic, health and other considerations may be weighed in decision-making.

We also acknowledge that balancing interests is challenging, and does have to be done on a case-by-case basis. Six respondents mentioned that they were uncertain if finding reasonable limits was possible, and that balance is hard to achieve with conflicting interests that are present in many of these cases.

7.0 Environmental justice

Section 4.1 of the framework defines and contextualizes environmental justice as it applies to the right. We are happy to see that the right considers populations who may be disproportionately impacted by pollution in both the consideration of disproportionate impacts of environmental harm and as a measure to ensure equitable decision-making under CEPA.

7.1 Populations that may be disproportionately impacted by pollution

In Annex 3 of the framework, we are happy to see that ECCC and HC are exploring the use of both “populations who may be disproportionately impacted” and “vulnerable populations”, to recognize that many of these populations are not inherently vulnerable, but rather that their susceptibility is associated with the circumstances of their lives.

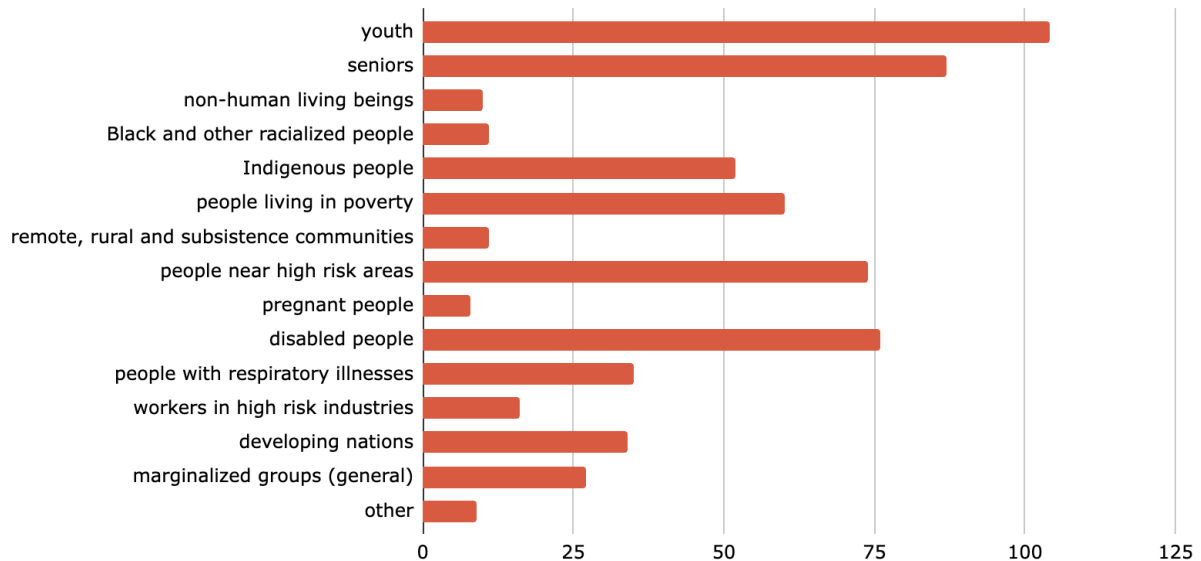
Youth understood that both of these factors were important to consider in environmental equity (Figure 13). We suggest that the framework **give clearer definitions of both “populations who may be disproportionately impacted” and “vulnerable populations”** to include the following groups: youth, seniors, non-human living beings (e.g. animals, trees), Black and other racialized people, Indigenous people, people living in poverty (including *homeless people*), remote, rural and subsistence communities, people near high-risk areas where pollution is likely to occur, pregnant people, disabled people, people with *respiratory illnesses*, *workers* in high-risk industries, developing nations, and incarcerated people. This is not an exhaustive list but it represents groups that youth identified as being either vulnerable or disproportionately impacted by pollution, along with using general descriptors like *marginalized groups* or *lower socio-economic status*.

There are many examples of populations that are disproportionately impacted by pollution in Canadian history. Youth are very aware of these examples and feel that CEPA can learn from the mistakes of previous policy-makers to protect current and future populations. An example below presented by one respondent highlights this sordid history.

“Urban planners have targeted marginalized groups historically in processes of ecoracism and eco-discrimination. In my hometown, Toronto, pollution of the Don River most affects the original

Indigenous Custodians of the land and incarcerated people in a prison built/expanded nearby by which urban planners internationally counted on when they began to industrialize the area in the 20th century (because they didn't want affluent settlers to feel those impacts instead).”

Figure 13. Which populations are more vulnerable or disproportionately impacted by pollution?



Moreover, we suggest that the framework **use both “populations who may be disproportionately impacted” and “vulnerable populations”, but not interchangeably.** This is because many groups, such as pregnant people, are not disproportionately impacted, and are only inherently more vulnerable to pollution. Although there is overlap between them, these two groups require different equity considerations and should be distinguished as such in the framework.

8.0 Intergenerational equity

As youth, we are strongly encouraged by the inclusion of intergenerational equity as a key principle under the right. In Section 4.2 of the framework, we believe that the current list of how intergenerational equity may be considered in the CEPA management cycle can be strengthened. The current wording in the framework does not allow for **explicit protection of the future generations’ right to a healthy environment**, nor does it expand on potential compromises that may need to be considered between the rights of current and future generations. Youth in our workshops also had additional suggestions on how the framework could incorporate intergenerational equity.

8.1 Considerations for intergenerational equity

As is explored in Section 1.4 of SYC’s internal report, future generations, as well as current youth, could be implicated more strongly within the framework. Youths were clear that future thinking is a very important element of the right (Figure 14).

Figure 14. How can CEPA apply intergenerational equity in its processes?



Respondents felt that considering youth mental health and wellbeing was one of the most important intergenerational considerations missing from the framework. This is explored more in the next section of this report, 8.2, as well as in Section 1.4.4 of SYC’s internal report.

Tied with considering youth mental health was future thinking. This connects nicely to the Seven Generations Principle that is mentioned in Section 4.2 of the framework. We believe this can go further, to **consider the impacts on future generations of humans and non-human beings** in nature. Environmental damage prevention is key to this future thinking, as is outlined in the precautionary principle in the framework. One way that environmental damage can be prevented is through a transition to renewable energy. We suggest that the framework make these protections more explicit. Protecting the environment now means that future generations are also **protected from health and cultural impacts, like [what consequence these chemicals inflict] from cumulative impacts of chemicals in their environment, or the loss of nature** as part of culture.

Moreover, youth respondents highlighted the need for intergenerational participation in decision-making, including both with youth and with elders. These concepts are expanded upon in Section 1.4.2 of SYC’s internal report. **We suggest that the framework outline opportunities for intergenerational collaboration**, like through a *meeting of youth and elders* during public consultations. First, youth must be properly educated through appropriate communication, and then the sharing of wisdom between youth and elders can be most effective. As one respondent put it,

“It is important to have opinions from both elders and youth because elders might understand the history of the land and youth might be more future-focused. Hearing both opinions can help find balance.”

Governments must also be accountable for their action and inaction on the environment and climate. To protect future generations, there should be **explicit accountability frameworks** that allow future generations to receive compensation for poor actions under previous governments. This is expanded on in Section 1.4.3 of SYC’s internal report to include delayed action as a specific trigger for environmental justice procedures.

8.2 Mental health

The consultation revealed a fundamental interconnection between environmental health and youth mental well-being. Throughout the workshops, some participants emphasized how environmental degradation and climate change impacts are causing increasing psychological distress, particularly manifesting as *eco-anxiety*. This psychological phenomenon has emerged as a critical concern among youth who feel a deep sense of responsibility for an uncertain environmental future, while simultaneously experiencing feelings of powerlessness in the face of systemic challenges. These feelings are often linked to ongoing environmental disasters in their communities. As one respondent put it,

“Empathy often kicks in when extreme weather events and climate crises affect others. Youth feel a burden to fix these issues because they see themselves as the future.”

While these concerns certainly extend beyond the scope of CEPA, government policy does play an important role in regulating pollution, which in turn impacts youth mental health. Strong policies that protect the right provide an important signal that things are moving forward and not backward. In this sense, the concept of non-regression is ever more important.

“Ecoanxiety [is] not only about the environment but also uncertainty. The government could choose to ignore it [climate change] one day or look at it seriously the other day. The whole problem is dependent on how people and the government think about it.”

Mental health should be considered an essential component of the right. The framework should explicitly recognize this connection and provide concrete mechanisms for addressing the psychological impacts of environmental degradation. We encourage the framework to include **formal recognition of eco-anxiety and the environmental-psychological impacts within CEPA’s scope**. This could include the integration of mental health impact assessments into environmental planning processes, dedication of specific funding for mental

health support in the event of environmental harm, and investment in research on the psychological impacts of environmental change. This is explored more in BTM's internal report on the Right to a Healthy Environment and Youth Mental Health.

Conclusion

We are grateful for the opportunity to have been able to consult with nearly 300 young people on the right to a healthy environment. With the proper context and introduction, this report highlights that youth — most of whom are too young to vote — are still able to offer valuable and insightful perspectives on complex issues to make sociopolitical change. We hope this marks the beginning of more consultative opportunities between SYC, BTM, and youth groups, as many high school educators have expressed a strong interest in hosting additional workshops of this nature.

We trust that ECCC and HC will find resonance with some of the suggestions outlined in this report, particularly in areas such as providing clearer and more accessible information, developing a dynamic and interactive online portal, clarifying access to remedies, giving greater attention to mental health, and ensuring the explicit consideration of future generations, to name just a few.

We look forward to learning about the outcomes of these consultations and the next steps on the right to a healthy environment that will follow.

Glossary

AMP	Administrative Monetary Penalty
BTD	Break The Divide
CEPA	Canadian Environmental Protection Act, 1999
ECCC	Environment and Climate Change Canada
HC	Health Canada
NPRI	National Pollutant Release Inventory
SYC	Sustainable Youth Canada
the framework	The Draft Implementation Framework for the Right to a Healthy Environment under the Canadian Environmental Protection Act, 1999
the right	The right to a healthy environment under the Canadian Environmental Protection Act, 1999

Annex 1: Workshop One-Pager



Right to a Healthy Environment Workshop




Context

In 2023, the federal government passed Bill S-5, affirming that all Canadians have the right to a healthy environment. Public consultations are held from **October to December** to create an implementation framework to define and structure this right. While some provinces and territories already enshrined this right in their regional laws, Bill S-5 adds a crucial layer of protection at the national level. To facilitate youth involvement, Sustainable Youth Canada & Break the Divide developed this gamified consultation workshop.

Audience Grades 9-12

Duration 60-75 minutes

Classes Social Science & Humanities, Science, Canadian Studies

Educational goals

- Identify the sources and impacts of pollution on our environment and health
- Increase understanding of federal and provincial environmental rights and laws
- Explore the concepts of Environmental Justice, Intergenerational Equity and Non-regression
- Empower students to engage in our democratic processes in a fun and accessible way

Workshop details

The workshop fits into a single class and includes an educational and interactive component. Topics such as environmental law, the management of toxic substances, and environmental justice are covered, followed by a role-play activity where students critically reflect on what the right to a healthy environment means to them.

This is a real consultation opportunity. We will collect and compile student insights into a feedback document that will be shared with the federal government. Interested students can also submit their feedback directly on the government's consultation platform.

For more information or if you are interested in receiving the workshop, please contact us:

(QC, NB, ON):
Sustainable Youth Canada
national@sustainableyouthcanada.com

(SK): Break The Divide
abhay@breakthedivide.net



Annex 2: Teachers Roundtable Results Summary

In addition to youth workshops across the country, BTD and SYC facilitated a virtual roundtable session and engaged informally on topics related to the right to a healthy environment with high school teachers from nine provinces. Below are general themes from our discussions with educators. Since youth strongly believe that the government should communicate with them through in-school participation, we feel these responses can help guide ECCC and HC in future collaborations with educators on CEPA and the right to a healthy environment. Additionally, we wanted to provide feedback on the framework that was not limited to youth feedback.

These insights reflect the need for a comprehensive, integrated approach to environmental education, one that addresses youth engagement, supports teachers, promotes mental health, and fosters community and Indigenous involvement in environmental decision-making.

Communication and access to information

Teachers emphasized the need for accessible, engaging, and multi-modal information delivery to effectively connect with students. They called for visual, interactive materials and hands-on, experiential learning opportunities. Additionally, teachers stressed the importance of direct community involvement and human-to-human communication. Improved communication channels such as social media, interactive websites, community meetings, and multilingual options were seen as effective ways to disseminate credible information.

Barriers to youth engagement

The roundtable identified several challenges to youth engagement in environmental action. Environmental awareness is often perceived as uncool, and there is a widespread sense of cynicism among youth. This is compounded by knowledge gaps and a lack of confidence in making an impact. Teachers suggested creating opportunities for small wins to build confidence, integrating environmental education into existing curricula, and removing financial barriers to participation. Strengthening student councils, supporting youth-led initiatives, and connecting environmental issues to local contexts were seen as key strategies for increasing youth involvement.

Integration into the education system

Teachers advocated for a cross-curricular and interdisciplinary approach to environmental education. They highlighted the importance of integrating outdoor and land-based learning and incorporating Indigenous knowledge and ways of knowing. To implement these changes, teachers recommended professional development, additional resources and funding for

environmental education, and support for extra-curricular initiatives. Strengthening partnerships with environmental organizations and incorporating real-world environmental case studies into curricula were also seen as important.

Mental health

Teachers expressed concern about the limited focus on eco-anxiety in current curricula and the need for balance between raising awareness and providing hope. They suggested dedicating time for processing environmental grief and training teachers to support students dealing with eco-anxiety. Creating green spaces in schools and integrating outdoor learning opportunities were recommended as ways to support students' mental health. Teachers also emphasized the importance of focusing on solutions and positive action, as well as nature's role in supporting mental well-being.

Community and Indigenous engagement

The importance of meaningful community consultation and the inclusion of diverse perspectives, including Elder knowledge and youth voices, was stressed by teachers. They called for long-term impact assessments, regular monitoring, and transparency in environmental projects. Teachers also recommended community benefit agreements and the incorporation of cultural and spiritual values into decision-making, guided by the seven generations principle.

Policy recommendations

Teachers highlighted the need for government support in several areas. This includes funding for environmental education initiatives, student participation in environmental conferences, and teacher training and development. Teachers also called for policy changes, such as mandatory environmental education components in curricula, the creation of youth engagement opportunities, and the removal of administrative barriers to environmental education.