



**MNC Response to
Environment and Climate
Change Canada's
Draft Implementation
Framework for the
Right to a Healthy
Environment**





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MNC Response to Environment and Climate Change Canada's Draft Implementation Framework for the Right to a Healthy Environment

INTRODUCTION

The Métis National Council (MNC) developed an analysis to provide a comprehensive response to the engagement questions posed by Environment and Climate Change Canada (ECCC) regarding the Draft Implementation Framework for the Right to a Healthy Environment (R2HE) under the Canadian Environmental Protection Act (CEPA). This report reflects a collaborative and expedited process that engaged Governing Members (GMs) and Métis youth to ensure their perspectives were meaningfully represented. Our approach included initial conversations to gather input, the synthesis of key responses, and a subsequent review and discussion with participants to validate and refine their feedback and inputs. By centering the voices of Métis representatives and prioritizing a distinctions-based approach, this document highlights critical insights, concerns, and recommendations that are essential for ensuring the framework aligns with Métis governance structures, values, knowledge systems and priorities.

Disclaimer

It is essential to note that the short timeline and modest resourcing provided by ECCC for this national policy discussion limited the MNC's ability to facilitate a comprehensive and meaningful engagement process. Engagement turnout was low, as ample time was not provided to ensure wider participation. Additionally, the GMs expressed concern about how their feedback will be incorporated into the framework and used in final decision-making. There is a need for clear assurances that the engagement process is not a performative measure but a genuine effort to incorporate Métis perspectives in substantive and ongoing ways.

To foster trust between this engagement initiative and its practical outcomes, the MNC and GMs urge greater transparency from ECCC about how Métis input will shape the framework and its implications for Métis people. Furthermore, the

technical and jargon-heavy nature of the engagement materials has created a barrier to inclusive and fulsome discussions, limiting accessibility for individuals who are not legislative or policy technicians. The MNC emphasizes the importance of addressing these concerns to ensure that Métis voices are meaningfully heard and respected in the development of this implementation framework and future legislative and policy work.

KEY THEMES & RECOMMENDATIONS

1. Meaningful Engagement and Accountability

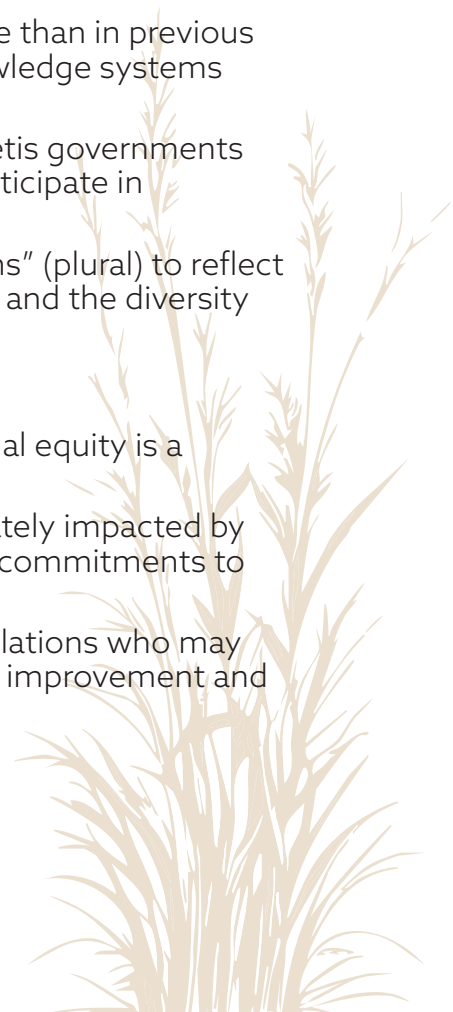
- The framework lacks clear mechanism to ensure Métis engagement is meaningful, ongoing, and actionable. Engagement must occur at the beginning of the CEPA cycle, rather than as an afterthought or later in the cycle.
- The accountability mechanisms within the framework should be strengthened to track how Métis input is implemented and ensure transparency in decision-making.
- Commitments must be actioned, with clearer implementation steps and stronger language (rather than vague phrases like “striving to achieve”).

2. Strengthening Indigenous Rights and Knowledge Integration

- The Indigenous knowledge section is more comprehensive than in previous government documents, but the integration of Métis knowledge systems must be continuous, not selective.
- Métis self-determination must be recognized, ensuring Métis governments control their data and knowledge systems and actively participate in environmental decision-making.
- The framework should use “Indigenous knowledge systems” (plural) to reflect the diversity of Métis, First Nations, and Inuit perspectives and the diversity of knowledges within distinctions.

3. Environmental Justice and Intergenerational Equity

- The inclusion of environmental justice and intergenerational equity is a positive step toward long-term, solutions-oriented policy.
- Marginalized communities and populations disproportionately impacted by pollution must be centered in decision-making, with clear commitments to environmental justice and equitable access to remedies.
- The language shift from “vulnerable populations” to “populations who may be disproportionately impacted by pollution” is a welcome improvement and should be reinforced in policy implementation.





4. Gaps in Defining Key Concepts and Targets

- Sustainability is not clearly defined, weakening the framework's guidance on where CEPA plays a role. The framework should define what sustainability means in an environmental, social, and economic context.
- The phrase "reasonable limits" is vague and concerning, particularly regarding access to clean air, water, and a healthy environment. The framework should specify what constitutes a reasonable limit and how these decisions are made.
- Biodiversity is frequently mentioned but not well-defined. The framework should go beyond listing biodiversity as a priority and outline specific protections, monitoring strategies, and habitat restoration efforts.

5. Youth Engagement and Mental Health Considerations

- Youth engagement must be explicitly integrated into CEPA decision-making to ensure their perspectives shape long-term environmental governance.
- The mental health impacts of pollution and climate change—including eco-grief and climate anxiety—should be recognized in CEPA processes.
- The framework should provide paid opportunities, mentorship programs, and structured pathways for youth to participate in environmental governance.
- Indigenous youth should be involved in biodiversity and climate monitoring initiatives (e.g., Guardians programs) as a way to address eco-grief through land-based action.

6. Strengthening Transparency and Reporting

- Annual reporting on CEPA implementation should include specific commitments, measurable outcomes, and progress tracking.
- The Right to a Healthy Environment Portal should include:
 - Clear data on pollution levels and environmental conditions, particularly for Métis and other disproportionately impacted communities.
 - Tools for legal assistance and community action to ensure affected communities can seek justice and access remedies.
 - Updates on Canada's fulfillment of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and Truth and Reconciliation Calls to Action related to environmental health.

While the Draft Implementation Framework for R2HE includes important principles and commitments, it requires stronger accountability measures, clearer definitions, and more meaningful engagement mechanisms to fully reflect Métis priorities and self-determination. The MNC urges Environment and Climate Change Canada (ECCC) to ensure that Métis knowledge, governance, and concerns are not only acknowledged but actively shape environmental decision-making under CEPA.

GENERAL QUESTIONS

1. Does the framework strike a good balance of being specific and transparent without being too long or overly technical? Are there sections of the framework where you would like to see more detail (or less)?

- The framework is overly technical and includes jargon-heavy language that keeps it from being accessible to non-legal experts.
- It uses non-committal language and lacks clear implementation steps as to how Indigenous knowledge will inform decision-making and when exactly in the CEPA cycle engagement will occur.
- Engagement with First Nations, Inuit and Métis is vague without specifying how engagement activities will be conducted in a lateral and meaningful manner.

2. Annex 1 describes examples of specific mechanisms to support the protection of the right under CEPA. Annex 2 contains Guiding Considerations for CEPA decision-makers. Are there other guiding considerations that could be added based on the descriptions of the various elements within the framework?

- Specific guiding considerations that address the needs of marginalized communities, particularly for Indigenous Peoples, should be considered and included. This should include assessing the potential impacts of decisions on communities facing environmental racism including exposure to the pollution of air, water and food sources.
- The framework should emphasize the need for equitable enforcement of environmental laws and focus on addressing historical injustices, ensuring marginalized communities are not disproportionately harmed by environmental degradation.
- Respect for distinctions-based governance structures is important to include within the key principles. Decision-making systems vary across distinctions and may include consultations with Elders, knowledge keepers, youth, leadership, community workers, community-determined experts, communities at large, self-governments, etc. In the implementation of CEPA, Canada must honour and seek to understand distinctions-based governance structures in their engagement of First Nations, Inuit and Métis.
- The framework must consider time sensitivity of infraction of R2HE. Certain threats to environmental human health can occur suddenly and acutely and Canada should be prepared to respond using its legislative and regulatory power in CEPA to threats identified by Métis governments.
- ECCC's commitment under the National Strategy Respecting Environmental Racism and Environmental Justice Act and other legislations should align with the implementation of the Framework for the R2HE and limit duplicate and contradictory processes that ECCC is leading.

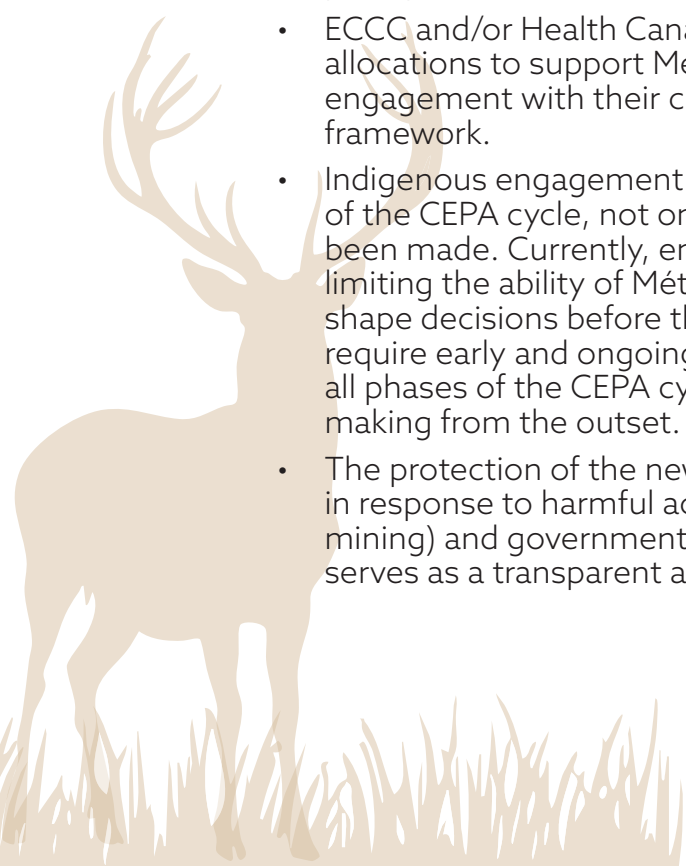


3. Section 2.1 describes the substantive elements of the right. Does this information help you understand the scope of environmental issues where CEPA plays a role?

- Considering that the framework does not define “sustainability” or “sustainable development”, the inclusion of these terms in Section 2.1 weakens the guidance of where CEPA plays a role. There is no language in Section 2.1 that indicates that environmental human health and safeguarding the R2HE would be prioritized over industrial operations or economic development.
- This section also fails to discuss environmental protection from harmful substances, pollutants, and wastes specifically in Indigenous communities, including rural and remote areas (i.e. extended boil water advisories, impacts of wildland fire, dumping near communities, nuclear waste and environmental racism)
- There is no mention of regulatory protection for safety of harvesters and hunters to be on the land (i.e. case of Jacob Sansom and Maurice Cardinal, two Métis men in Alberta who were murdered while hunting). The R2HE should acknowledge everyone’s right to be safe and healthy while being on the land.

4. Section 4.0 elaborates on 3 new principles and provides high-level examples of how the principles may be considered within each step of the CEPA cycle. Do you have suggestions for other ways these principles could be considered to help support protection of the right?

- Rights-based language that clearly sets the commitment to Nation-to-Nation relationships is missing and must be integrated, affirmed and recognized as a principle
- ECCC and/or Health Canada should create distinctions-based direct funding allocations to support Métis governments to conduct fulsome and ongoing engagement with their citizens on a R2HE and the implementation of this framework.
- Indigenous engagement in CEPA processes must occur at the beginning of the CEPA cycle, not only at later stages when key decisions have already been made. Currently, engagement often happens at the end of the process, limiting the ability of Métis governments and communities to meaningfully shape decisions before they are finalized. The framework should explicitly require early and ongoing engagement with Indigenous Peoples throughout all phases of the CEPA cycle to ensure their perspectives inform decision-making from the outset.
- The protection of the new principles should include regulatory repercussions in response to harmful actions by extractive industries (i.e. oil and gas, mining) and governments of the communities harmed by such actions. This serves as a transparent accountability measure to indicate the implications



of industry and government actions and the harms on human and environmental health for current and future generations.

- There are current efforts being made to co-develop the definition of environmental justice through engagement by ECCC. The proposed new principles should follow a similar process, and be positioned as evergreen concepts, ensuring there is an ongoing opportunity for the definitions to evolve while also adhering to the outcome of the principles.

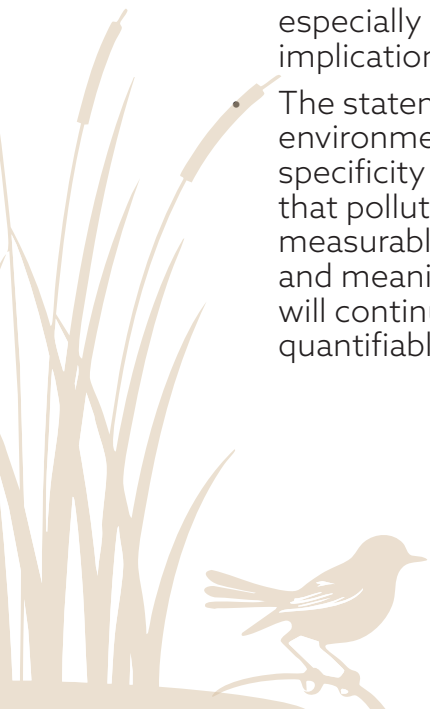
OTHER GENERAL REFLECTIONS

- The language shift from ‘vulnerable populations’ to ‘populations who may be disproportionately impacted by pollution’ is a meaningful and welcomed change. This terminology more accurately reflects the systemic and structural inequities that contribute to disproportionate environmental burdens, rather than implying inherent weakness. This shift strengthens the framework’s commitment to environmental justice and aligns with the need for action on climate change and pollution exposure in impacted communities. The continued use of this terminology throughout the document is an important step in the right direction and should be further reinforced in implementation.
- The framework provides a thorough and well-articulated discussion on meaningful participation in decision-making, particularly in different contexts, including Indigenous engagement. The emphasis on defining what meaningful engagement looks like in various settings is a positive step. Additionally, the establishment of more accessible mechanisms for public feedback is a welcomed initiative, as it enhances transparency and ensures that diverse voices can contribute to environmental decision-making under CEPA. Ensuring these mechanisms are culturally appropriate, widely promoted, and easily accessible will be key to their success.
- The inclusion of environmental justice and intergenerational equity in the framework is an encouraging step toward a long-term, solutions-oriented approach. These principles recognize that meaningful change requires not only addressing immediate environmental harms but also ensuring that future generations do not inherit disproportionate burdens. Embedding these concepts into policy implementation, enforcement mechanisms, and ongoing decision-making will be essential to achieving lasting environmental and social justice.
- The phrase “subject to reasonable limits” is repeated throughout the document when describing the right to a healthy environment, yet its definition remains ambiguous and concerning. While Sections 5.0 and 6.0 attempt to outline what these limits may entail, the lack of clear parameters raises critical questions. For instance, in the context of protecting people from harmful substances, ensuring clean air and water, achieving a sustainable climate, and maintaining healthy ecosystems—what



constitutes a “reasonable limit”? From an economic standpoint, trade-offs may be considered, but from an environmental justice or intergenerational equity perspective, are there limits to achieving these fundamental rights? Addressing this ambiguity within the framework would strengthen confidence in its implementation and clarify how competing considerations are balanced.

- While biodiversity is referenced frequently throughout the document, there is no clear definition provided, nor an explanation of how it can be effectively protected and promoted. Biodiversity has increasingly become a buzzword, yet its true importance for human, environmental, and animal health must be clearly articulated. Defining biodiversity and outlining its role within CEPA would help ensure that its significance is fully understood and appreciated by decision-makers and the public.
- Section 2.1.5 lacks discussion on tangible actions being taken to enhance or protect biodiversity. The document largely focuses on biodiversity loss due to toxic substances, pollutants, and waste, but this issue extends far beyond pollution alone. Habitat loss—driven by climate change, agricultural practices, and invasive species—is a significant contributor to biodiversity decline. Addressing this gap by incorporating solutions to mitigate biodiversity loss (such as sustainable land management practices, conservation efforts, and invasive species control) would strengthen the framework’s commitment to biodiversity protection and move beyond surface-level acknowledgment of the issue.
- The statement that “the right to a healthy environment in CEPA is limited to the CEPA context and is not applicable to other laws, policies, and contexts” (p. 6) is unclear and raises concerns about the broader impact of this framework. If this means that CEPA’s authority is limited from a legislative perspective, it seems to contradict the framework’s broader themes of interconnectedness and an interdisciplinary approach to environmental protection. While bureaucratic and governmental limitations exist, this restriction should be clarified and critically examined to ensure that CEPA does not operate in isolation but instead contributes meaningfully to environmental governance across sectors. At a minimum, the statement should be revised for clarity and accessibility to ensure that all readers—especially Indigenous partners and the general public—fully understand its implications.
- The statement in Section 2.1 that “a clean, healthy and sustainable environment does not mean there will be no air or water pollution” (p. 9) lacks specificity and raises concerns about accountability. While it is understood that pollution elimination is a long-term goal, clear parameters, targets, or measurable thresholds should be included to ensure progress is trackable and meaningful. Without defined benchmarks, there is a risk that goalposts will continue to shift, leading to weaker commitments over time. Establishing quantifiable pollution reduction targets—such as air quality index thresholds



or water contamination limits—would provide greater clarity, accountability, and public trust in CEPA’s environmental protection efforts.

- Section 2.1.4 on Sustainable Climate is largely comprised of a list of government Acts rather than a clear explanation of how tangible progress is being made in this area. While policy and regulatory frameworks are important, the absence of a substantive discussion on actual advancements, strategies, or measurable commitments is concerning. Given the critical role of the oil and gas industry in Canada’s GHG emissions and economy, this section should provide a more direct and transparent assessment of how Canada is balancing emissions reductions with economic realities. Simply listing regulatory Acts does not provide insight into their effectiveness, enforcement, or long-term climate impact. Strengthening this section with clear actions, progress indicators, and accountability measures would improve transparency and public confidence in CEPA’s role in addressing climate challenges.
- The principle of non-regression is crucial for ensuring long-term environmental protection, but Section 4.3 is jargon-heavy and difficult to understand. Given the importance of preventing the weakening of environmental protections over time, this section should be rewritten in clear, accessible language to ensure that all stakeholders—including Indigenous communities, youth, and the general public—fully understand its implications. Providing concrete examples of non-regression in action, such as policies that have successfully prevented environmental rollbacks, would help clarify how this principle is applied in practice.

5. Section 8.0 proposes a Right to a Healthy Environment Portal that would provide information to the public on the right, including how to access existing remedies under CEPA, and provide a dedicated email address for the public to submit questions and feedback related to the protection of the right. Are there any other types of information or tools that you would like to see in this portal?

- The portal should include a section outlining progress of Canada’s fulfillment of the United Nations Declaration Act (UNDA) Action Plan obligations and the Truth and Reconciliation Calls (TRC) to Action as they relate to the protection of land and environmental human health for First Nations, Métis and Inuit.
- The portal should also include tools to empower communities to seek justice, such as access to legal aid services, community organizing tools, and clear strategies for navigating the legal system.
- The portal should provide data on pollution levels, environmental conditions, and enforcement actions in an accessible format, especially for underserved communities. These resources will ensure that individuals and communities can effectively engage with the legal processes, access remedies and participate in environmental decision making.
- It is important to note that the proposed portal cannot act to replace or substitute meaningful relationships and communication between ECCC and Indigenous rights-holders. The means to communicate with Indigenous communities should be co-developed using a distinctions-based approach.



6. Section 8.0, Accountability and Reporting, highlights that the Minister of Environment and Climate Change Canada will report on the implementation framework annually within the CEPA Annual Report. What information would be most relevant for the annual report to include to help you understand how the framework is being implemented?

- The framework lacks sufficient accountability mechanisms to ensure that commitments are actioned rather than merely aspirational. Phrases like “striving to achieve” objectives weaken the framework’s enforceability and reduce confidence in its implementation. The language should be strengthened to ensure clear commitments and measurable outcomes.
- To reinforce accountability, there must be a commitment to measuring achievements and reporting these results directly to Indigenous Peoples in a transparent and accessible way. This includes providing regular updates on progress, explaining why certain objectives were or were not met, and engaging Indigenous communities in assessing whether commitments are being fulfilled.
- Information on how input from Indigenous Peoples is being implemented and actioned should be reported on continuously.
- Accountability and reporting should include specific examples of Canada’s fulfillment of UNDA measures and TRC Calls to Action related to environmental human health for First Nations, Métis and Inuit.
- Consistent deadlines and timelines should be applied to the Minister’s reporting process to ensure accountability is met.

INDIGENOUS PARTNERS

Please note: The answers to 1, 2 and 3 are combined below.

- 1. Are there any distinctions-based Indigenous knowledge concepts from your Nation/community that you would like to see in Section 3.1 on Indigenous knowledge? If relevant to your Nation or community, do the descriptions of the Indigenous knowledge concepts in Section 3.1 align with your understanding of them?**



2. **Annex 1 proposes the development of an Indigenous Knowledge Policy Framework for ECCC/HC decision-makers, working with Indigenous partners, that would guide them in how to approach bridging, braiding, and, weaving Indigenous knowledge with western science in their work within CEPA.**
- a) Recognizing that ongoing learning and relationship-building will be necessary, would having a framework to help guide decision-makers increase your confidence in ECCC/HC's ability to bridge, braid, and weave Indigenous knowledge with western science in decision-making?
- b) Which concepts or approaches would you want to see included in an Indigenous knowledge framework for CEPA decision-making? Please share any specific sources or models that are meaningful. The draft framework references the Indigenous science indicators developed by ECCC's [Indigenous Science Division](#), as well as Indigenous data sovereignty principles such as the [CARE Principles for Indigenous Data Governance](#) (collective benefit, authority to control, responsibility, and ethics) and the [First Nations principles of OCAP](#) (ownership, control, access, and possession). Do these principles reflect/encompass your Nation or community's approaches to data sovereignty and/or sharing knowledge? If not, what is missing?
3. **Do the terms 'bridge, braid, and weave' Indigenous knowledge with western science resonate with you? If not, what other term(s) would?**

Combined Response

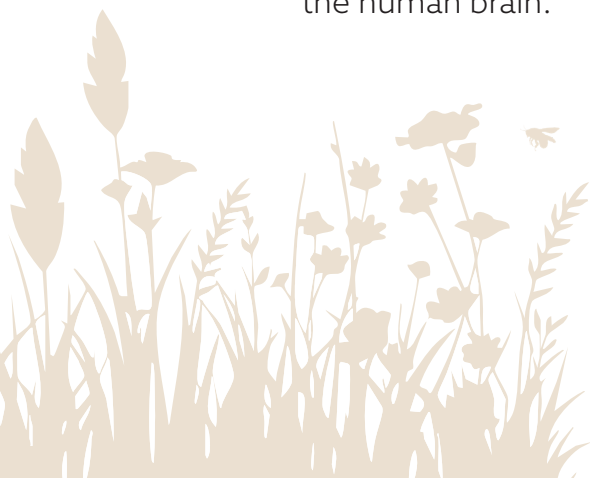
- The discussion of Indigenous knowledge in the framework is more comprehensive and respectful than what has historically been seen in government documents. The approach recognizes the importance of Indigenous knowledge systems and their role in environmental decision-making. Ensuring that this respect translates into meaningful co-development, long-term engagement, and appropriate governance structures will be essential in fully integrating Indigenous perspectives into CEPA processes.
- Indigenous knowledge should be referred to in plural and as "Indigenous knowledge systems" because there are multiple distinctions for Indigenous Peoples (Métis, First Nations, Inuit) and within the three distinctions, many different forms of knowledge. By using the language "Indigenous knowledge systems" the framework can be inclusive of these multiple knowledge systems (which can also be further influenced through an intersectionality of perspectives).



- The draft framework lacks information about how Indigenous Peoples will be engaged throughout decision making processes where their knowledge systems are being braided, weaved or bridged. A framework that does not engage Indigenous Peoples at every stage of decision making would not be appropriate, as Indigenous knowledge systems cannot be interpreted or applied without the holders and users of those knowledge systems being present and actively involved in decision making. Indigenous knowledge systems cannot be bridged, braided or weaved without free, prior and informed consent.
- Therefore, the MNC does not recommend that ECCC and Health Canada proceed with a decision maker framework, rather, the focus should be on providing long term engagement and implementation funding to Métis governments so they can be at the decision-making table when Métis knowledge systems are being incorporated into decisions.
- Additionally, ECCC can work to improve the representation and safety of Indigenous People within government staff so that these knowledge holders can support the braiding of knowledge in a daily and ongoing manner.

4. Section 4.2 on Intergenerational Equity lists the Seven Generations teaching as an approach to considering intergenerational equity. In what ways could you see CEPA decision-makers applying this concept in decision-making? Annex 2 includes Guiding Considerations for decision-makers; what guiding consideration would help decision-makers to apply the concept of the Seven Generations?

- An important part of implementing this teaching in the CEPA framework would be to use the precautionary principle and move quickly to act on issues that threaten the R2HE. The precautionary principle, if applied properly, protects future generations by taking a cautious approach to anything that could cause harm to environmental human health.
- The seven generations teaching is on a continuum of the past, present and future and therefore the R2HE would need to be able to address legacy toxic exposure to individuals and communities.
- Using a seven generations teaching approach also necessitates that the R2HE considers the impacts of toxic exposures in the future for current and new generations. For example, the accumulation of microplastic in the human body and the transfer of those plastics to fetuses via the placenta and breast milk, or the extended half-life (approximately 20 years) of methylmercury in the human brain.



- However, as mentioned above, this teaching should not be applied by CEPA decision-makers without the direct involvement of the Indigenous holders of this teaching / knowledge.

5. How can the procedural element of participation in decision-making, discussed in Section 2.2.2, be enhanced by Indigenous knowledge, traditional practices, or community protocols?

- Canada needs to invest in Indigenous institutional capacity building to enable equitable participation by Indigenous rights-holders to exercise their rights in a meaningful way. Investments in Indigenous institutional capacity-building enables contributions related to Indigenous knowledge systems, traditional practices and community protocols equitably in decision-making processes.
- Several key provisions within the UNDA provide clear pathways to enhance this participation and expanding the procedural elements of access to information, participation in decision-making, and access to effective remedies ensures that Métis knowledge and community protocols are more deeply integrated into environmental governance.
- Co-development is a key UNDA provision that promotes Métis peoples working as equal partners with the government to create policies and programs. This ensures Métis knowledge, values, and community protocols shape environmental decisions. Expanding this in R2HE would involve formalizing consultation mechanisms where Métis leaders are actively engaged in decisions regarding environmental health and protection.
- Access to Information should be expanded by providing environmental data and policies in formats that are culturally safe for Métis communities, using Indigenous languages and dialects and traditional communication methods. In addition, mechanisms and/or structures regarding Métis data sovereignty and ownership should be developed. This would help Métis peoples stay informed and actively participate in decision-making.
- The right to Free, Prior, and Informed Consent (FPIC) ensures Métis peoples are fully informed and have the right to consent or withhold consent before decisions are made. Integrating FPIC explicitly into the R2HE under CEPA would guarantee that Métis consent is sought for any decisions that may impact Métis peoples, including but not limited to lands and resources, cultural practices and community well-being. This would ensure that decisions align with Métis priorities, values, and rights across all areas of impact.



- Self-determination under the UNDA empowers Métis communities to make decisions about governance, policies, and services. In environmental governance, this means Métis knowledge would directly shape policies on land management and sustainability, leading to more effective and culturally relevant solutions.
- Access to Effective Remedies ensures Métis peoples have clear pathways to address environmental harm. Expanding this would involve creating remedies tailored to Métis lands, practices, and laws. Restorative justice approaches could also be explored, focusing on restoring the environment in line with Métis traditional ecological knowledge.
- Incorporating these expanded procedural elements within R2HE-CEPA ensures that Métis governments are not only involved but central to environmental decision-making, fostering sustainable, inclusive, and culturally relevant outcomes.

6. What are some barriers for Indigenous Nations, communities, and organizations in regard to access to information, participation in decision-making, and access to effective remedies (the procedural elements listed in Section 2.2) in the context of CEPA that mechanisms proposed in the implementation framework could help address? How so?

- A non-exhaustive list of barriers includes limited access to information and disaggregated data, as well as the absence of culturally relevant formats, and insufficient consideration of diverse knowledge systems, which hinder meaningful participation in decision-making processes.
- The framework should include provisions to ensure accessible, transparent information, meaningful consultation, and guaranteed, equitable representation for Indigenous Peoples in decision-making bodies, ensuring their active and informed participation in all relevant processes.
- Direct distinctions-based funding must be prioritized to support Métis governments in conducting ongoing engagement with their citizens, enabling meaningful participation in CEPA processes.
- Specific mechanisms should be established to create dedicated channels for Indigenous Peoples to participate in CEPA processes, supported by logistical and financial resources to address barriers to full engagement.
- A significant barrier is the lack of federal knowledge on how to engage effectively with Métis governments. The framework should include education and training initiatives to enhance federal partners' understanding of Métis governance structures and decision-making systems.
- Definitions of meaningful consultation and engagement should be clearly articulated within the framework, including specific timelines (e.g., initiating engagement 1 year to 6 months before producing documents), who is involved, their respective roles, and the processes through which their input will be integrated into decision-making.



- The framework should emphasize that meaningful consultation involves transparency, reciprocity, two-way dialogue, and collaboration, ensuring that Indigenous input is not merely used to validate decisions, but is actively incorporated into shaping and informing those decisions.
- The framework must ensure feedback and inputs from Indigenous Peoples is not only collected but also actioned, with mechanisms in place to track and report on how input is implemented.
- Key principles, such as the Seven Generations teaching, should be consistently integrated throughout the framework to strengthen its alignment with Indigenous knowledge systems.
- The framework should recognize and respect Métis self-determination, ensuring that engagement processes support autonomous decision-making and align with Métis governance and co-development principles.

YOUTH

1. Section 4.2 elaborates on intergenerational equity: The principle of intergenerational equity within the CEPA context emphasizes that it is important to meet the needs of the present generation without compromising the ability of future generations to meet their own needs.

- a) Does this section align with your understanding of the principle of intergenerational equity? If no, why not, and what would you add, while staying within the scope of CEPA?
- As outlined in the MNC Climate Strategy report, the impacts of environmental harm are not only immediate but also have profound long-term consequences. These effects must be fully detailed and understood through a Métis-specific lens to ensure appropriate responses.
 - Métis harvesters are losing critical food sources, including deer, elk, moose, and fish, due to habitat loss, the spread of infectious diseases, and the destruction of grazing flora. Trappers are facing the loss of traditional, generational traplines as forest fires and flooding become more frequent. Rising food costs and the decline in access to traditional foods further exacerbate food insecurity for Métis citizens.
 - Métis people are experiencing increasing health concerns linked to environmental changes, including exposure to wildfire smoke, extreme heat, plastic pollution in the air, water, and land, as well as the growing prevalence of vector-borne diseases such as Lyme disease. These threats impact not only physical well-being but also long-standing cultural and land-based practices.
 - Children and youth, who will bear the brunt of these crises, are already experiencing significant mental stress and eco-grief. The uncertainty

surrounding their ability to practice and pass down their cultural traditions across generations adds another layer of anxiety.

- Climate events—including heat waves, wildfires, floods, and air pollution—are restricting cultural practices and community gatherings. These disruptions highlight the urgent need for environmental protection measures that safeguard Métis ways of life for future generations.
- However, in the face of these compounding challenges, it is essential to recognize *Sîpikisôwin* (see-pihk-so-win), the Northern Michif word meaning resilience. Métis people have always demonstrated resilience, courage, and adaptability in overcoming adversity. This spirit remains central to addressing current and future environmental challenges.
- While the principle of intergenerational equity is well articulated in theory, there is a significant gap between its definition and its practical implementation. Addressing this gap requires concrete commitments and action.
- A meaningful discussion of intergenerational equity must consider both the immediate impacts on today's generation and the long-term implications for future generations. The scale of climate change's effects is so vast that it is difficult to even conceptualize a world where future Métis generations will still have access to traditional plants, animals, and land-based practices. The compounding effects of infectious diseases, habitat destruction, invasive species, and economic disparity make this an urgent concern.
- Despite the severity of these challenges, solutions do exist—they simply need to be prioritized. Policy decisions and resource allocation must reflect a long-term commitment to protecting the land, water, and air for future Métis generations.
- The stress of facing such an uncertain future is taking a heavy toll on Métis youth. It is difficult for younger generations to witness the enormity of the climate crisis while also seeing some members of older generations fail to take it seriously or act with urgency. While this is not universally true, the idea of intergenerational equity has been lost in some communities—particularly among Métis families who have been disconnected from their culture. For many, the belief in a better future is only now re-emerging after generations of struggle focused on survival.
- If intergenerational equity is to be meaningfully implemented within CEPA, it must move beyond theoretical discussions and into concrete commitments that address these barriers, support Métis self-determination, and ensure that future generations can continue to live in a clean, healthy, and sustainable environment.



- b) What are some other ways in which this principle may be considered in the various CEPA cycle steps described in this section?
- Canada should prioritize the inclusion of youth in CEPA decision-making spaces, recognizing the value of their perspectives on intergenerational equity and the long-term impacts of environmental harms. The CEPA cycle should include explicit steps to ensure that youth have access to timely, relevant, and understandable information to support informed participation.
 - Existing models, such as MNC's Table Youth initiative and engagement at events like Strawberry Moon, demonstrate the benefits of including youth voices in policy discussions. A government-led equivalent of such initiatives would help institutionalize youth engagement within CEPA processes.
 - Establishing formal opportunities for youth to join decision-making committees, advisory boards, and working groups would provide direct pathways for engagement. These spaces should include structured mentorship opportunities to equip youth with the knowledge and skills to contribute meaningfully while also allowing them to share insights with their peers. This would create a ripple effect, fostering broader youth engagement in environmental governance.
 - The CEPA framework should acknowledge that youth participation is not only a matter of representation but also an essential mechanism for ensuring that environmental policies consider the needs of future generations. Their perspectives bring urgency, innovation, and long-term thinking to policy discussions that directly affect their futures.
 - By integrating youth participation into all stages of the CEPA cycle, Canada can uphold the principle of intergenerational equity in a way that is both actionable and impactful, ensuring that environmental decision-making today supports a sustainable future for generations to come.

2. In input from youth on the R2HE discussion document, the mental health impacts of pollution and exposure to chemicals were raised as a priority concern. How can mental health impacts of pollution/exposure to chemicals be considered in CEPA processes?

- The mental health impacts of pollution and chemical exposure must be explicitly recognized within CEPA processes to ensure a comprehensive approach to environmental health. Given the increasing prevalence of eco-grief, anxiety, and other mental health challenges, particularly among youth, the framework must integrate strategies that protect and support mental well-being alongside physical health.
- The CEPA framework should include a dedicated principle on the protection and response to mental health impacts stemming from environmental harm. This principle should guide federal program funding allocations to support initiatives that address youth mental health, including culturally relevant healing practices and community-based interventions.

- Mental health considerations must be embedded into CEPA decision-making to ensure that policies account for the psychosocial effects of pollution and chemical exposure, particularly for youth who will bear the long-term consequences of environmental degradation.
- Intergenerational land-based healing programs should be incorporated into CEPA's implementation strategies. Programs such as Guardians provide a model for supporting youth in processing eco-grief and climate anxiety through cultural and environmental action. By integrating on-the-land experiences and mentorship, these programs help foster resilience and emotional well-being while strengthening traditional knowledge and environmental stewardship.
- Given the significant mental health toll of environmental degradation, youth who are struggling with climate anxiety and pollution-related stress may find it difficult to engage in policy discussions. Ensuring mental health support mechanisms are in place will enhance youth participation in environmental governance and decision-making.
- By integrating these elements into CEPA processes, the framework can take a holistic approach to environmental protection—one that acknowledges not just the physical effects of pollution but also its mental, emotional, and cultural impacts, particularly for Métis youth and other Indigenous communities.

a) What kinds of research and monitoring do you think are needed in this area to support protection of the right (as described in section 7.0 of the draft implementation framework)?

- Direct distinctions-based funding allocations should be provided to support Métis governments in conducting research and monitoring related to mental health and environmental harm. These funds will ensure long-term, community-driven engagement.
- Community-led surveys designed and implemented by Indigenous governments and organizations should be prioritized, with data-sharing agreements with Canada to understand the mental health impacts of pollution and climate change on Métis citizens.
- Mental health impacts of pollution and environmental degradation should be formally integrated into CEPA processes by:
 - Expanding research on the links between environmental harm and mental health.
 - Incorporating mental health considerations into risk assessments and regulatory frameworks.
 - Developing mitigation strategies for communities disproportionately affected by pollution.



- Youth-specific research is essential to understanding how best to support young people as they process the emotional, spiritual, and physical impacts of climate change. Research should explore strategies to empower youth to discuss and navigate climate grief while ensuring that their perspectives are reflected in policies addressing climate change and biodiversity loss.
- Research should identify barriers to youth participation in environmental governance and recommend solutions. Many youth under 18 are excluded from decision-making spaces due to lack of caregiver support and accommodations. Future research should explore how to empower parents and caregivers to create space for youth engagement.
- Beyond documenting negative mental health impacts, research should also examine youth resilience in the face of climate challenges. Identifying factors that contribute to resilience can help inform programs that empower youth and highlight their leadership in climate action.

b) How can communications, outreach, and informational materials acknowledge and provide guidance on mental health impacts of pollution/exposure to chemicals?

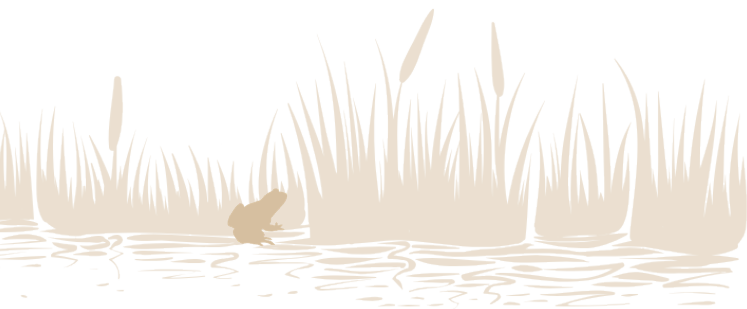
- Ensure accessibility and clarity by reducing jargon and using plain language in all communication materials to make information more understandable for a wide audience.
- Leverage multiple communication channels, including social media, websites, and community spaces, to ensure broad public access to information on the mental health impacts of pollution and exposure to chemicals.
- Tailor outreach materials to reflect the diverse needs of Métis, First Nations, and Inuit communities, ensuring that culturally relevant resources are available in appropriate formats and languages.
- Fund and support Indigenous-led outreach efforts by ensuring that Métis governments and Indigenous organizations lead the development of informational materials and engagement strategies, backed by federal funding for community-led consultation and education initiatives.
- Expand partnerships beyond government-to-government communication by collaborating with healthcare providers, universities, youth camps, and organizations like the YMCA to integrate mental health awareness into broader community programming.
- Align provincial and federal healthcare efforts to ensure that mental health support related to environmental harm is consistently addressed across all levels of governance, avoiding gaps in service delivery.
- Engage youth directly by consulting youth groups and organizations to ensure that messaging resonates with younger audiences and that youth perspectives are reflected in communications strategies.

3. How can the framework provide guidance to decision-makers that ensures youth voices are effectively included in CEPA decision-making processes?

- Establish a framework of accountability to ensure that youth engagement is not just a symbolic exercise but results in concrete actions. The framework should require follow-ups on youth input, with transparent reporting on how their contributions have influenced policy and decision-making.
- Shift from a government-led approach to a youth-driven process by ensuring that youth voices shape discussions from the outset, rather than being consulted after decisions have already been made. The framework should acknowledge Indigenous jurisdiction in environmental decision-making and ensure that Métis, First Nations, and Inuit youth have a role in shaping policies that affect their futures.
- Apply an intersectional lens to environmental decision-making, recognizing that different groups—including Indigenous youth—experience environmental harm and barriers to participation in unique ways. The framework should address environmental racism and ensure that youth from marginalized communities have equitable opportunities to contribute.
- Move beyond token youth representation by creating pathways for youth-led engagement in CEPA decision-making. Rather than treating youth as just one stakeholder group among many, they should be empowered to take leadership roles in shaping environmental policies.
- Adopt a community-first approach that prioritizes grassroots engagement with youth organizations, schools, and local Métis communities. This will ensure that youth participation is accessible, meaningful, and reflective of their lived experiences.

4. What are some barriers to youth participation in the procedural elements listed in Section 2.2 that the mechanisms in this framework could potentially help to reduce?

- Lack of clear and accessible information on engagement opportunities. Ensure that information about CEPA-related decision-making is widely available in youth-friendly, plain language formats and distributed through multiple channels, including social media, schools, and community organizations to reach a broader audience.
- Financial barriers prevent many youth from participating. Provide paid opportunities and compensation for youth engagement to ensure equitable participation, particularly for those who may not have the financial means to contribute their time and expertise voluntarily.
- Youth in Métis communities may not be aware of available engagement opportunities. Métis governments should proactively share and promote CEPA engagement opportunities within their communities to ensure that Métis youth can access and participate in decision-making spaces.

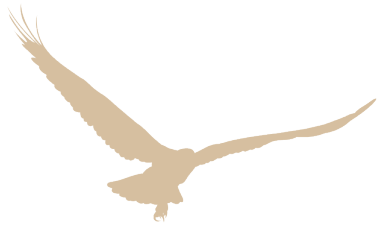


- Young people under 18 often face logistical challenges in participating due to lack of caregiver support. The framework should include measures to support caregivers, such as covering travel costs or providing accommodations, to enable minors to attend and contribute to CEPA engagement processes.
- Older youth (18+) may lack long-term incentives to stay engaged. Offer non-financial benefits, such as certificates of participation that can be included in résumés or professional portfolios, to recognize and add value to youth contributions while encouraging ongoing engagement.

5. What features of this framework do you see as being particularly relevant to youth?

- Substantive elements of the right to a healthy environment (Section 2) are critical for youth, as they will inherit the long-term consequences of environmental decisions. Ensuring strong protections under CEPA will safeguard their right to clean air, water, and ecosystems.
- Indigenous Rights (Section 3) are particularly relevant to Métis youth, as environmental policies must recognize Indigenous knowledge, governance structures, and cultural connections to the land. Youth engagement should reflect an intersectional approach that includes diverse identities such as Two-Spirit and gender-diverse perspectives.
- Principles (Section 4), particularly the three new principles introduced in the framework, are foundational for ensuring that youth voices are considered in decision-making processes that impact future generations.
- Accountability and Reporting (Section 8) is crucial for youth engagement. The framework must include mechanisms to track and report on what actions were taken based on youth input, what goals were achieved, and why certain recommendations were or were not implemented. Transparency in this process is key to ensuring meaningful participation.
- Defining 'Sustainability' in a way that reflects youth perspectives. The term "sustainable" must be clearly articulated within the framework, recognizing that youth and future generations may have evolving definitions and priorities related to sustainability.
- Research and Monitoring (Section 7) provides an opportunity for youth participation. Programs like Guardians could allow young people to engage directly in environmental monitoring and land-based actions, which can help address eco-grief and foster empowerment through direct environmental stewardship.
- Youth should be explicitly included in discussions on the principle of non-regression, ensuring that environmental protections under CEPA are not weakened over time.
- All aspects of the framework are inherently relevant to youth. Every decision impacting the environment today will shape the future that youth will experience, making it essential that their perspectives are integrated into all aspects of CEPA's implementation.







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