



JULY 22, 2026

Delivered by email:TC.engagement.TC@tc.gc.ca

Dear Sirs/Mesdames:

Re: Canadian Environmental Law Association Comments on *Strengthening One Canadian Economy Through Trade and Transportation, Discussion Paper*

The Canadian Environmental Law Association (“CELA”) is pleased to provide comments in response to the discussion paper, *Strengthening One Canadian Economy Through Trade and Transportation* (the “**Discussion Paper**”) published by the Government of Canada on May 8, 2026.

CELA is an Ontario specialty legal aid clinic dedicated to environmental equity, justice and health, ensuring low-income, under-served and under-resourced communities are front and centre in environmental decision-making and environmental laws.

Part A – General Comments

The Discussion Paper focuses on diversifying trade relationships and attracting investment. Although the Discussion Paper touches upon issues such as job creation, cost reduction and supply chain reliability, its main focus does not address the local transportation shortfalls that are experienced by [members of under-served communities, including many rural, remote and Indigenous communities](#).¹ In our work as a legal aid clinic, we have heard regularly from low-income Ontarians that the very high costs for both transportation and utilities in remote and Northern communities are an [unmanageable burden](#).² We recommend a broader focus for any consideration of enhanced transportation networks to explicitly include the transportation needs of remote, rural and Indigenous communities.

¹ Abid, Rabi. *Recommendations for Municipalities Focus: Transportation for Rural Communities*. Canadian Environmental Law Association (2022). https://cela.ca/wp-content/uploads/2022/11/1504_Rural_transportation_Report.pdf.

² *Pathway Out of Energy Poverty in Northern Ontario*. Canadian Environmental Law Association (2023). <https://cela.ca/pathway-out-of-energy-poverty-in-northern-ontario/>.

Part B – Response to Questions

Where would reducing administrative burden most benefit your organization or sector?

Reductions in regulatory oversight can have unintended and harmful effects on environmental impact assessments, rural land, and remote communities.³ “Red tape reduction” or efforts to reduce regulatory requirements are often ill-informed. Generalized statements about administrative burdens must be verified. Any claims that reductions in regulatory requirements will not cause environmental or health impacts must be justified with evidence.

It should not be assumed that there is a need to reduce any administrative burden on proponents without more detailed analysis. Any decisions to streamline regulatory oversight must be analyzed carefully and with public input.

What opportunities do you see to improve collaboration across trade corridors?

There is an opportunity to improve transportation networks to remote, northern and Indigenous populations that reside near trade corridors. We encourage the government to consult and learn from local communities to understand the unique transportation challenges in Northern, remote and rural communities. Collaboration should be done with the goal of upholding Indigenous rights in accordance with the *United Nations Declaration on the Rights of Indigenous Peoples* (“UNDRIP”). This involves seeking the free, prior and informed consent of Indigenous peoples.

In addition, we recommend that transportation enhancements be considered alongside energy and electrification reforms.

How can the government best partner with industry and Indigenous Peoples to support shared economic outcomes?

Transportation network commitments should extend beyond a commercial or industrial focus. Discussions related to community safety, sustainability and reliable public transit options for remote communities should be included.

The government should consider enhancements to bus routes, rail lines, and electrified technology to serve those communities that are currently under-resourced and under-served. Community engagement must be meaningful, transparent and timely.

Are there any concerns, risks, or unintended impacts that should be considered during implementation?

³ *The Importance of Watershed Management in Protecting Ontario's Drinking Water Supplies - Executive Summary*. Conservation Ontario (2001).
https://conservationontario.ca/fileadmin/pdf/conservation_authorities_section/SWPCORecoWalkerton.pdf

(i) Environmental Impacts

When designing new or amended regulatory oversight regimes, we urge the government to prioritize the importance of independent evaluation of impacts, particularly to the surrounding environment and communities. This includes considering environmental protection efforts and mitigation of any negative effects to human health, species and biodiversity, air, soil and water quality, and our climate.

(ii) Impacts to Remote, Northern and Indigenous Communities

Further development of trade corridors can have impacts on communities in relation to Indigenous rights and health. Any trade corridor enhancements should prioritize capacity, reliability, safety and resilience across the transportation system for these under-served communities, and the priorities of affected Indigenous communities.

A report by [Destination Northern Ontario](#)⁴ has identified key challenges related to infrastructure in Northern Ontario. These challenges include road safety, infrastructure vulnerability, lack of visitor service facilities, internet network coverage issues, and insufficient EV charging points. Such infrastructure challenges not only affect commercial transportation corridors but also affect the residents of northern and remote populations.

A policy brief by the [Affordability Action Council](#)⁵ in 2024 noted that over four million Canadians live in various low-density areas, including remote, northern and Indigenous communities. The Discussion Paper mentions engagement with Indigenous communities and stakeholders on topics such as governance, port collaboration, and protection of waterways. However, the Discussion Paper only addresses this engagement with respect to commercial transport. Low-income communities face challenges related to personal transport. This includes the need for better public transportation options, including bus routes and rail lines, especially to access health care. Infrastructure funding and investment should focus on these challenges, as well.

Meaningful consultation is critical as the government addresses national challenges in transportation, as well as energy in the North. The Government's commitment to securing the North in its 2026 national electricity strategy also proposes investment in large-scale energy infrastructure. In this regard, ensuring that both energy and transportation systems serve under-resourced communities in northern and remote areas is critical. Renewable energy solutions in both the transportation and energy sectors, such as battery storage technology for remote populations, should be explored in greater detail.

⁴ *Road Transportation Network in Northern Ontario*. Destination Northern Ontario (2024). https://destinationnorthernontario.ca/sites/default/files/2025-10/MC_Transportation%20Challenges%20and%20Solutions_04-14-25_LowRes.pdf

⁵ Affordability Action Council. *Rural Recognition: Affordable and Safe Transportation Options for Remote Communities*. Institute for Research on Public Policy (2024). <https://irpp.org/research-studies/affordable-safe-transportation-options-remote-communities/>

How could the proposal be improved to reduce risks and support effective implementation?

The Discussion Paper does not provide specific details surrounding consultation and assessment processes. More specific consultation processes and community outreach plans must be created. The focus of enhancements to transportation networks should be to serve communities, not only industry.

Yours truly,

CANADIAN ENVIRONMENTAL LAW ASSOCIATION



Theresa McClenaghan
Executive Director & Counsel



Jacqueline Wilson
Counsel