

Dear Minister,

Re: ERCO 025-1363 Proposed Regulatory Exemptions for Mineral Exploration Activities

I am writing to respectfully ask that Ontario reconsider its proposal to exempt certain early and advanced mineral exploration activities from environmental approvals under the Environmental Protection Act and the Ontario Water Resources Act.

There is broad agreement that Ontario's mining approval system needs modernization. Fragmented permitting increases costs, delays, and uncertainty for proponents, communities, and First Nations alike. Addressing these inefficiencies is necessary. However, removing upfront environmental permissions is not the only, or safest, path to faster approvals.

Ontario already has tools to streamline development, including the "one project, one process" approach, lead-ministry coordination, and concurrent inter-ministerial reviews. More consistent use and resourcing of these mechanisms could shorten timelines while maintaining environmental protections and public trust.

The proposed exemptions raise serious concerns. Ontario's forests, wetlands, peatlands, and headwater systems are among the province's most effective carbon sinks and are essential to water quality and flood resilience. Scientific evidence shows that even early exploration such as line cutting, drilling, access roads, water pumping, and diesel equipment can fragment ecosystems, release stored carbon, increase emissions, and degrade freshwater systems. Once disturbed, these landscapes cannot be easily restored, and cumulative impacts are difficult to detect when oversight relies largely on self-registration and self-monitoring.

Environmental approvals also serve as formal triggers for Indigenous consultation and cumulative-effects assessment. Exemptions increase the risk that disturbance and water use could occur before Indigenous rights, treaty obligations, and traditional land uses are meaningfully considered, creating legal risk for the Crown and uncertainty for proponents, which keeps investors away.

Faster approvals are achievable without sacrificing safeguards. Front-loading Indigenous consultation, setting clear approval timelines, using regional environmental baselines, and maintaining enforceable protections for carbon, water, and sensitive landscapes would deliver more durable economic outcomes.

Strong environmental standards and respectful partnerships are not barriers to development, they are foundations for success.

Sincerely,