



May 16th, 2025

EA Modernization Project Team
Environmental Assessment Modernization Branch
135 St Clair Ave West
4th Floor
Toronto, ON
M4V 1P5

RE: ERO [#025-0396](#)– Addressing Changes to the Eagle’s Nest Mine Project

Ontario Nature offers the following comments on the proposed amendments to the *Environmental Assessment Act* pertaining to the Eagle’s Nest Mine Project.

The Eagle’s Nest Mine Project was subject to an environmental assessment per a voluntary agreement signed with Noront Resources in 2011 and was approved by the ministry in 2015.

The proposal to terminate this agreement is a direct infringement on Aboriginal and treaty rights and the stated purpose of the *Environmental Assessment Act* .

The purpose of the *Environmental Assessment Act* is the betterment of the people of Ontario by providing protection, conservation, and wise management of the environment. The *Environmental Assessment Act* also protects and upholds Aboriginal and treaty rights as affirmed in section 35 of the *Constitution Act*.

Environmental assessments are a critical part of project implementation and ensure that the duty of public consultation is adhered to, and that the rights of Indigenous Peoples are upheld. Furthermore, environmental assessments are crucial in preventing devastating and long-lasting damage to the environment and their costly economic ramifications. **Removing requirements for environmental assessments undermines public trust, infringes Indigenous rights, puts Ontario’s environment at risk, all of which could undermine the stated goal of expediting mining projects. In other words, developing a mine requires a social licence to operate, which can be supported through comprehensive environmental assessment processes.**

Eagle’s Nest is set to be a major producing mine with a traditional 3,000 tonne per day underground mining operation. Therefore, it is especially crucial that necessary environmental assessments are undertaken to ensure environmental and public safety.



Ontario Nature therefore recommends that the ministry withdraw the proposal to exempt Eagle's Nest from the *Environmental Assessment Act*. It is also recommended that the terms of the voluntary agreement approved by the ministry are upheld and adjusted only upon the agreement of the applicable Indigenous Communities.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Morris".

Tony Morris
Conservation Policy and Campaigns Director
Ontario Nature