



May 16th, 2025

Ministry of Energy and Mines, Sector and Intergovernmental Policy Branch
99 Wellesley St. W
Toronto, ON
M7A 1W3

RE: ERO [#025-0409](#) –Proposed Amendments to the Mining Act 1990

Ontario Nature offers the following comments on the proposed amendments to the *Mining Act, 1990* specifically as outlined in the above referenced ERO posting.

It is evident that the amendments outlined in Schedule 5 have been proposed without consideration for Indigenous rights, environmental protections, public health and safety, and freedom of information.

Ontario Nature explicitly objects to the following proposed changes and their implications:

- ***Amendments to the purpose of the mining act*** that would see Ontario's economy valued above the upholding of Indigenous rights, the duty for public consultation, and minimizing the effects of mineral extraction projects on public health, safety and the environment, as currently articulated in the Act. A sole focus on economic factors undermines the long-term sustainability of Ontario while violating Aboriginal and treaty rights of section 35 of the Constitution.
- ***The expansion of ministerial powers*** that would see significant discretionary powers applied to the operations and functions of the Mining Lands Administration System (MLAS). While the stated intent is to protect the strategic national mineral supply chain, such wide-ranging ministerial powers limits public accountability and transparency. Additional clarity is needed on when and how such powers would be utilized. The proposal also does not provide any evidence that such authority is needed to protect the mineral supply chain.

The changes proposed within Schedule 5 of Bill 5, *Protect Ontario by Unleashing our Economy Act, 2025* do not appropriately account for the *Mining Act's* potential impact on the environment or respect Indigenous rights. Furthermore, the broad expansion of ministerial powers has not been justified with supporting evidence to alleviate concerns related to accountability and transparency.

The economic potential of Ontario's mineral resources cannot be realized without due consideration for public health, safety, the environment and the free, prior and informed



consent of Indigenous Peoples. Ontario Nature urges the ministry to address these concerns before proceeding with any legislative amendments.

Sincerely,

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

Tony Morris
Conservation Policy and Campaigns Director
Ontario Nature