



January 30th, 2026

Permissions Modernization Team
Client Services and Permissions Branch,
135 St. Clair Avenue West, Floor 1
Toronto, Ontario
M4V 1P5

RE: ERO #025-1363 – Streamlining Environmental Permissions for Mineral Exploration

Ontario Nature offers the following comments on the Ministry of Environment, Conservation and Parks (MECP)'s proposed amendments to the [Ontario Water Resources Act, R.S.O. 1990](#) (OWR) and the [Environmental Protection Act, R.S.O. 1990](#) (EPA).

Ontario Nature is a charitable conservation organization that protects wild species and wild spaces through conservation, education and public engagement. Established in 1931, we represent more than 130,000 members and supporters and more than 150 member groups across the province.

Several proposals have been issued to expedite the mining process, often at the expense of robust permitting, environmental assessments, and consultation processes. The focus on acceleration has reduced the opportunities for Indigenous and public input into key decision-making areas within the mining process. As a result, critical input is being overlooked, and previously established processes such as environmental impact assessments are being undermined. The recent proposal, Streamlining Environmental Permissions for Mineral Exploration, continues to undermine comprehensive project reviews and engagement opportunities.

While Ontario Nature recognizes processes can be modernized and streamlined, permitting and environmental assessment processes are not “red tape”, but necessary safeguards and accountability mechanisms. Furthermore, when establishing exemption criteria, Indigenous input is often ignored and processes behind the designated criteria are unclear.

The following comments on this proposal aim to correct oversight of critical permitting processes and provide recommendations for exemption criteria.



Amendment to the OWR

The proposed amendment to *Ontario Regulation 387/04* under the OWR seeks to exempt mining proponents from being required to obtain a Permit to Take Water (PTTW). Exemptions for a PTTW pose significant risk to the environment, as mining activities pose a high risk for [contamination of water bodies](#).

Additionally, the eligibility criteria and operational requirements for exemptions to a PTTW have been established without transparency. As a result, it is unclear how the government defined the metrics for exemption and what expert opinions were included in their decisions. The criteria also overlook Indigenous perspectives and impacts to communities.

While Ontario Nature acknowledges the government's consideration of the environment, a reliance on existing legislation is insufficient for safeguarding water systems. Current policies, such as the [Provincial Standards for Early Exploration](#), assesses the impacts of exploration through the procedural aspects of specific activities, rather than the [cumulative impacts on waterbodies](#).

Ontario Nature recommends that any exemption criteria from a PTTW be based on Indigenous knowledge and scientific evidence to ensure no long-term impacts to water quality, water quantity or aquatic species in waterbodies.

Amendment to the EPA

The proposed amendment to *Ontario Regulation 524/98* under the EPA seeks to exempt mining proponents from requiring an Environmental Compliance Assessment (ECA) for air and noise emissions from early exploration activities and certain aspects of advanced exploration.

As reflected in the proposed amendments to the OWR, the province has not provided clarity on how the metrics for exemption were defined and what perspectives were involved in the process. Furthermore, exemptions to an ECA for air and noise emissions [pose serious threats to wildlife and nearby communities](#).

While the province has provided its description for a "sensitive receptor", which is notably consistent with the *Aggregate Resources Act*, it fails to acknowledge impacts on wildlife. Furthermore, it does not take into consideration the potential [air pollution accumulated from mining activities](#). As a result, there are no mitigating factors within the amendment to account for environmental stressors, failing to comprehensively account for possible impacts of the proposed amendments.

Ontario Nature recommends that any exemption criteria for air and noise emissions be based on Indigenous knowledge and scientific evidence to avoid negative impacts to wildlife and communities in proximity to mining activities.



As the province seeks to expedite mining development, it should refrain from overlooking the existing checks and balances that ensure mining is done in a socially and environmentally responsible manner. Any proposals for significant changes to established processes should be provided through the Environmental Registry with complete transparency on the analyses and rationales that went into determining processes that impact the environment. In the case of this proposal, there is no clearly defined explanation of what is considered a 'low risk' mining activity. This undermines the *Environmental Bill of Rights*, preventing meaningful input from the public.

Sincerely,

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

Tony Morris
Conservation Policy and Campaigns Director
Ontario Nature