



environmental
defence

February 2, 2026

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

RE: ERO 025-1363 Streamlining environmental permissions for mineral exploration

Proposed amendments to Ontario Regulation 387/04 under the Ontario Water Resources Act, R. S. O. 1990

Environmental Defence Canada (EDC) is concerned about the suite of changes proposed in ERO 025-1363. EDC opposes the proposed changes to O. Reg. 387/04 under the Ontario Water Resources Act, R.S.O. 1990 that would "exempt proponents from being required to obtain a Permit to Take Water (PTTW) for certain water taking activities related to early exploration activities subject to proposed eligibility criteria and operational requirements." EDC asks that the Ministry of Environment, Conservation and Parks (MECP) not make the proposed changes to O. Reg. 387/04 due to the potential impacts on local ecosystems and communities.

It is essential to have a comprehensive permitting system in place for all stages of project development and implementation that requires water. Water extraction can have many significant impacts that vary depending on environment, purpose, and operator. It can lead to groundwater depletion which could impact ecosystems and people who depend on these water sources and also cause environmental degradation due to the alteration of surrounding ecosystems or habitats.

If approved, the proposed amendments would eliminate all safeguards currently in place through the PTTW process for certain water taking activities related to early exploration activities subject to proposed eligibility criteria and operational requirements. The safeguards ensure that decisions and activities are made responsibly and align with water stewardship goals that frame the Ontario Water Resources Act.



EDC asks that the Ministry withdraw the proposed amendments to O. Reg. 387/04 under the Ontario Water Resources Act, R.S.O. 1990 under ERO 025-1363 in order to continue to ensure that the full scope of the environmental, technical, and community impacts are rightfully considered. We thank you for the opportunity to comment on this proposal.

Sincerely,

Rebecca Kolarich
Program Manager
Environmental Defence Canada