

February 3, 2026

Permissions Modernization Team
Client Services and Permissions Branch
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VIA ENVIRONMENTAL REGISTRY SUBMISSION

Subject: ERO number 025-1361 Exempting low-risk activities from requiring environmental permissions

Professional Geoscientists Ontario (PGO) appreciates the opportunity to comment on ERO posting 025-1361. PGO is the self-regulatory organization governing the practice of professional geoscience in Ontario and reporting to the Minister of Energy and Mines. PGO protects the public by regulating Ontario registered geoscientists and advancing professional practice. To support PGO in fulfilling its mandate, the PGO reviews and comments on proposed regulatory changes affecting environmental geoscience practice and professionals. The Environmental Geoscience Subcommittee has reviewed the proposed changes relevant to our mandate.

The ERO proposal provided a link to an appendix that describes activities that the Ministry of the Environment, Conservation and Parks (MECP) considers low risk and therefore not requiring environmental permissions from the MECP; however, the document does not provide the rationale applied in determining that each activity would be considered low risk. Updating the appendix document to include reasons why the described activities are low risk would assist MECP staff, professionals and proponents assess whether their proposed activity should fall under the proposed exemption and clarify the intent of this regulatory change.

Thank you for the opportunity to provide comments on the proposed regulatory changes.

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