

February 3, 2026

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

Subject: ERO number 025-1363 Streamlining environmental permissions for mineral exploration

Professional Geoscientists Ontario (PGO) appreciates the opportunity to comment on ERO posting 025-1363. 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 proposal includes two key amendments within PGO's purview:

1. Exemptions for low-risk early exploration activities related to geoscience, including:
 - Certain sewage works associated with early exploration, provided they are not for sanitary sewage treatment and are tied to an early exploration permit under the Mining Act.
 - Specific groundwater and surface-water takings related to early exploration, where:
 - Groundwater takings do not affect surrounding groundwater or surface-water features, and
 - Surface-water takings are from water bodies or permanent streams above a certain size, and represent less than 5% of the seven-day average streamflow.
2. Clarification of the construction-site definition under the water-taking EASR regulation to include activities associated with mineral development (e.g., access roads, mine reclamation), addressing previous interpretation challenges under Regulation 63/16.

PGO offers the following comments and considerations:

- **Insufficient detail for impact assessment:** The proposal does not describe how determinations of “no impact” would be made (e.g., for dewatering an exploration

shaft). Additional clarity is needed regarding the evaluation process, responsible parties, and documentation requirements. Given that groundwater studies fall within PGO's mandate, we would be pleased to review further details when available. When considering responsible parties, the MECP should also consider that in addition to environmental concerns, dewatering is an activity with health and safety implications for those working in excavations or underground.

- **EASR registration requirements are unclear:** The proposal does not specify whether exempted sewage works or water takings would require EASR registration. PGO recommends that MECP mandate ESAR registration to maintain oversight and transparency if these activities are exempted from ECAs or PTTWs. In addition, the MECP should consider adding a threshold of 379,000 litres per day of water, similar to other regulations, where a PTTW would still be required.
- **Consider including pumping tests as exempt activities:** Pumping tests are fundamental tools for assessing potential groundwater-taking impacts. Including pumping test as an exempt activity, requiring only EASR registration could provide for further efficiency gains consistent with the intent of the current proposed regulatory changes.

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



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