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Ministry of the Environment, Conservation and Parks
Government of Ontario
777 Bay Street
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February 3, 2026

Re: WWF-Canada's comments on proposal for *Streamlining Environmental Permissions for Mineral Exploration* (Proposal: 025-1363)

WWF-Canada's research and on-the-ground experience indicate that a strong legal and regulatory framework is the best approach to balancing economic benefits with the well-being of nature and communities. Instead, Ontario continues to propose changes under Bill 5 based on the pretense that environmental permitting and authorization processes are a "burden" for the mining industry. We continue to see the proposed changes as deregulation that puts the environment, economy, and health and well-being of Ontarians at risk. **Now is the time to be strengthening the legal and regulatory framework for mining, including the data collection processes that inform effective decision-making.** As such, we offer the following comments.

Insufficient Detail: The Proposal (025-1363) aims "to exempt proponents from having to obtain environmental permissions from the Ministry of Environment, Conservation and Parks (the ministry) for certain low-risk early exploration activities and aspects of advanced exploration projects." Yet, **the Proposal does not define "low-risk early exploration activities" or the "aspects of advanced exploration projects"** that will be covered by the exemptions, nor does it provide evidence of how the ministry evaluates the environmental and social risks associated with these activities (e.g. through both compliance and effectiveness monitoring).

The Ministry justifies the proposed exemptions by highlighting that proponents will still be required to obtain an exploration plan or permit and, for advanced exploration, adhere to an approved closure plan "which generally include terms and conditions that are protective of the environment." No information is provided about the nature of terms and conditions, which elements of the environment they are intended to "protect", how they are determined, or how they are monitored. WWF-Canada agrees with the Auditor General's 2025 annual report recommendation that **ERO postings should contain enough information to enable the public to make informed comments about the potential effectiveness or impacts of proposals.**

Inadequacy of Provincial Standards for Early Exploration: The Proposal repeatedly suggests that Ontario's Provincial Standards for Early Exploration are a tool to mitigate potential environmental impacts from early exploration activities. Through outreach activities with First Nations, WWF-Canada has learned that the Provincial Standards for Early Exploration are viewed at the community level as being insufficient to effectively mitigate the potential impacts from exploration activities. WWF-Canada agrees. Fewer than four pages of the Provincial Standards are devoted to "requirements", of which the only environmental protections are:

- Store drill core samples 30m from water
- Pile overburden and disturbed bedrock 30m from water
- If left on site, drill fluids, cuttings and mud must be contained and 30m from water

- Capping and sealing drill holes if they produce water or encounter underground mine openings or solution cavities.

Clearly, the standards' environmental mitigation requirements are inadequate, not to mention the complete absence of requirements/mitigation for activities that are incidental/ancillary to exploration activities (e.g. trail and/or access road construction and use).

Ontario's environment is already under stress from climate change, land use changes, and other stressors. Contrary to the Ministry of Energy and Mines (MEM's) unsubstantiated determination that exploration activities are low-risk and that impacts are limited and temporary, **research shows that these activities have the potential to impact water resources, wildlife, and broader ecosystem function.** This is especially the case when considering the potential for cumulative impacts from exploration and other nearby or overlapping development. **WWF-Canada recommends the province adopt a more robust approach to impact assessment and mitigation for early exploration activities.**

Permits to take water: The Proposal does not identify which early exploration activities will be exempt from a Permit to Take Water (PTTW) nor the predicted impacts of exemptions. Where a PTTW is no longer required, it is unclear how the MEM will know and be able to monitor whether the eligibility criteria and operational requirements noted in the Proposal are being met and maintained. More information is required **from the ministry to ensure that adequate resources are available to conduct site inspections and effectiveness monitoring** of the criteria, standards, and mitigations for exploration activities.

As we have commented previously (ERO: 025-0062), **Ontario already lacks the robust data required to make informed decisions and address potential impacts (including cumulative) from exploration activities.** It is WWF-Canada's understanding that the province does not maintain a public record of how many companies hold water-taking permits, if/when those permits have been transferred, or how much water is being withdrawn daily. Further exempting exploration activities from needing a permit (exploration activities under 50,000 litres per day are already exempted) will make even cursory estimates of daily water use more difficult and less accurate. Furthermore, the proposed transferring of oversight of the PTTWs for mineral exploration from the MECP to the MEM, combined with an anticipated increase in exempt activities, will make it more difficult for the MECP to achieve its objective to "protect Ontario's air, land, water, species at risk and their habits". **WWF-Canada recommends the province improve and standardize the data required of proponents and ensure it is available across government ministries and the public.**

Air and noise emissions: The Proposal exempts early and advanced exploration activities from requiring an Environmental Compliance Approval (ECA) for air and noise emissions and justifies this with claims that these emissions are similar to drilling and blasting for the construction of a building or structure (activities that are also exempt from an ECA). However, **early and advanced exploration activities tend to take place away from urban centers in areas with closer proximity to important wildlife habitat and different soundscape and air quality baselines.** Furthermore, the proposal aims to use the sensitive receptor criteria within the *Aggregate Resources Act* to determine whether advanced exploration projects are exempt from obtaining an ECA. However, **"sensitive receptors" do not account for important habitat features for wildlife, including species at risk, such as nesting, denning, and calving grounds and/or migratory pathways.** Research and Indigenous Knowledge have long highlighted concerns related to air and

noise emissions and how they can disturb wildlife and cultural practices, such as hunting, trapping, and fishing. The permitting process also often acts as a trigger for public and Indigenous consultation. Allowing these activities to proceed without oversight presents serious risks to the environment, wildlife, and communities, and moves away from the principles of accountability and transparency that are enshrined in the *Environmental Bill of Rights*. **WWF-Canada recommends broadening the definition of sensitive receptors to account for important environmental features while strengthening the permitting process and consultation with Indigenous Peoples.**

Ontario is already recognized as both a national and global leader in mineral exploration and development. With hundreds of active exploration permits across the province and a strong push to expand mineral activities, WWF-Canada urges the Government of Ontario to rethink its continued deregulation. Instead, we encourage Ontario to:

- Include sufficient information in ERO postings such that the public can provide informed comments about the potential effectiveness or impacts of proposals.
- Adopt a more robust approach to impact assessment and mitigation for early exploration activities to ensure environmental and social safeguards are in place from the earliest stages of the mining sequence.
- Ensure adequate resources are allocated to site inspections, and effectiveness monitoring of criteria, standards and mitigations.
- Improve and standardize the data required of proponents and ensure it is made available across ministries and the public.
- Broaden the definition of sensitive receptors to account for important environmental features and strengthen permitting and consultation requirements for water-taking and air and noise emissions.

We appreciate the chance to provide the above comments and welcome the opportunity for continued discussion.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Saunders', with a stylized, flowing script.

Karen Saunders
Vice President, Wildlife & Industry
WWF-Canada