



WWF-Canada
410 Adelaide Street West
Suite 400
Toronto, Ontario
Canada M5V 1S8

Tel: (416) 489-8800
Toll-free: 1-800-26-PANDA
(1-800-267-2632)
Fax: (416) 489-8055
ca-panda@wwfcanada.org
wwf.ca

Ministry of Natural Resources
Government of Ontario
300 Water Street
Peterborough, Ontario
K9J 8M5

August 24, 2026

RE: Proposing a Project Evaluation Policy that would replace the Class Environmental Assessment for Ministry of Natural Resources Resource Stewardship and Facility Development Projects

WWF-Canada welcomes the opportunity to comment on the proposed Project Evaluation Policy (PEP) to replace the Class Environmental Assessment for the Ministry of Natural Resources Resource Stewardship and Facility Development Projects (Class EA-RSFD).

The proposal represents a significant change in how projects undertaken or authorized by the MNR would be evaluated for their potential environmental impacts, replacing a legislated Class EA process with an internal Ministry of Natural Resources (MNR) policy document that exempts new projects from Part II.1 of Ontario's *Environmental Assessment Act*, R.S.O. 1990.

WWF-Canada recognizes the value of making environmental review more efficient and reducing unnecessary duplication so long as it is not at the expense of environmental oversight, transparency, or accountability. There are some activities for which the Class EA-RSFD is the only environmental oversight required, and ensuring comprehensive assessment of environmental impacts is particularly important in cases where those activities (e.g. construction of a road or water crossing) are only one component of a larger project (e.g. mineral exploration) that itself has no further legislated environmental oversight.

In light of these concerns, we urge the government to strengthen the proposed PEP by:

- **Making the evidence and methodology used to determine project risk and potential impact transparent;**
- **Revising the predetermined Appendix 2 exclusions to account for environmental sensitivity and the potential for cumulative effects, including from future developments;**
- **Explicitly incorporating cumulative effects assessment into preliminary review and project evaluation;**
- **Introducing more distinct opportunities for accountability and meaningful public consultation; and**
- **Incorporating monitoring of the effectiveness of mitigation measures and associated reporting into the PEP's five-year review.**



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The following responses to the questions posed in the policy paper expand on the above recommendations.

1. Does the PEP as proposed strike the right balance between being an efficient process and providing environmental oversight?

It is difficult to comment on the balance between efficiency and environmental oversight given that the proposal provides little evidence to demonstrate why replacing the Class EA-RSFD is necessary or how the PEP will provide equivalent or improved environmental outcomes. The proposal states that most projects screened through the Class EA-RSFD have a low potential for environmental effects and describes the existing process as administratively burdensome, duplicative, and unnecessarily delaying projects. However, little supporting analysis is provided to demonstrate the nature and extent of these issues.

WWF-Canada appreciates the rigor and transparency provided by the Class EA-RSFD's comprehensive screening and categorization process, which applies progressively more rigorous procedural, consultation, and assessment requirements as the potential for environmental effects and public or agency concern increases. In contrast, the proposed PEP provides exclusions for projects deemed to have lower potential for impacts (Appendix 2) with no evidence for how this list was determined. Other projects will undergo a preliminary review to determine if they have a high enough potential for impacts to warrant a full project evaluation. The PEP describes the preliminary review as "high-level and not a detailed impact assessment" and states that it would rely on readily available information. Limited information is provided on the methodology that will be used to determine project risk via the preliminary review.

WWF-Canada recommends that the MNR strengthen the preliminary review section of the PEP by clearly setting out the criteria and methodology that will be used to determine whether a project has a higher potential for impacts. The preliminary review should include a standardized set of environmental and social screening criteria, like the Class EA-RSFD, to support evidence-based decision making, especially where readily available information is limited.

The MNR should also publish evidence supporting the broader transition to PEP, including where delays and duplication currently occur under the Class EA-RSFD (especially since it was amended as recently as 2024) and how environmental outcomes are expected to be maintained under this approach.

2. Are the proposed exclusions (in Part III S3 and Appendices 1 and 2) appropriate? Are there other regulatory processes that provide similar environmental oversight and consultation that should be included in Appendix 1?



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The predetermined exclusions for projects identified as having a “lower potential for impacts” in Appendix 2 raise concerns. The proposal states that the MNR identified these activities based on “past experience and analysis,” but does not provide evidence nor explain how the environmental impacts of these activities were assessed.

This is especially relevant to mineral exploration and its supporting infrastructure. Mineral exploration activities continue to be characterized as being “limited,” “temporary” and “low impact” despite significant gaps in research and monitoring. The MNR authorizations for infrastructure supporting mineral exploration (e.g. the construction of roads and water crossings) currently trigger the Class EA-RSFD. Under the proposed PEP, however, Appendix 2 predetermines that certain smaller infrastructure projects have lower potential for impacts and thus excludes them from further environmental scrutiny. This includes culverts 1.2 meters in diameter or less crossing a span of less than three metres, the construction of roads less than 1 lane km, certain access points, and water-related excavation, dredging and filling in previously disturbed areas.

WWF-Canada recommends revising the predetermined exclusions in Appendix 2 so that project type or size alone do not determine whether an activity is excluded from project evaluation. The exclusions should account for the environmental sensitivity and cultural significance of the project location, the potential for an activity to enable or support future development, and its potential contribution to cumulative effects. The MNR should publish the evidence and analysis used to designate activities in Appendix 2 as having a lower potential for impacts, and establish a process for periodically reviewing these exclusions.

3. What factors should be considered to determine if a project has a higher potential for impacts? Does the PEP adequately consider these factors?

The PEP recognizes the importance of considering other activities and disturbances when assessing project impacts. WWF-Canada agrees but recommends strengthening and clarifying how cumulative effects will be considered, particularly when determining whether a project has a higher potential for impacts.

The Class EA-RSFD provides useful direction that should be maintained in the PEP. It explicitly recognizes that the effects of multiple projects can accumulate to reach critical thresholds or interact to create effects greater than those of individual projects alone. It directs consideration of changes resulting from past, present, and future projects and recognizes that the potential for significant cumulative effects should inform the geographic scope of project evaluation. This is particularly important where individual projects fall below predetermined thresholds. For example, Appendix 3 identifies MNR approvals for the construction of certain roads greater than one lane-kilometre as having a higher potential for impacts. Smaller roads may still undergo preliminary



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review, but their significance cannot always be understood from their individual footprint alone, particularly where multiple access routes and other disturbances occur across the same landscape.

WWF-Canada recommends strengthening the preliminary review and project evaluation sections of the PEP to provide clear direction for assessing cumulative effects, drawing on the approach already established under the Class EA-RSFD. This should include consideration of past, existing and reasonably foreseeable future activities; an appropriate assessment of the region; and whether interactions among disturbances could increase the significance of otherwise smaller individual impacts.

4. Do the projects listed in Appendix 3 seem appropriate? Are there other MNR projects that should be added?

The projects identified in Appendix 3 generally appear to represent activities with a higher potential for environmental impacts. However, the proposal does not explicitly reference mineral exploration or the role that MNR authorizations can play in enabling exploration activities. While mineral exploration itself is primarily regulated under the *Mining Act, R.S.O. 1990*, MNR approvals can be required for associated activities involving public lands and natural resources, including certain access roads, water crossings, land dispositions and supporting infrastructure. The PEP should clarify how MNR approvals associated with mineral exploration will be treated and whether activities such as road and access creation, should be given greater consideration in Appendix 3.

6. Does the PEP process provide sufficient opportunity for public engagement?

Meaningful engagement depends on access to sufficient information, support for capacity, opportunities to influence project outcomes before decisions are finalized, and transparency regarding how comments were considered in the final decision. All Project Evaluation Reports, supporting studies, methodologies used to determine project risk, mitigation plans, monitoring reports, and final decision documents should therefore be made publicly available. The MNR should also clarify how Indigenous priorities and knowledge will inform project evaluations and influence final project decisions.

The proposed PEP streamlines the engagement process by reducing the number of formal consultation milestones. There is no public consultation period during the preliminary review, and no opportunity for input, review, or reconsideration once the final Project Evaluation Report has been finalized. Additionally, under the Class EA process, a section 16 order can be requested if there are outstanding concerns about potential adverse impacts on constitutionally protected Aboriginal and treaty rights, and a project cannot proceed until the Minister makes a decision. The PEP does not afford this option.



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WWF-Canada recommends that the PEP introduce more distinct opportunities for accountability and meaningful public recourse by including consultation at the preliminary review stage and establishing a clear mechanism for concerns to be raised and addressed even after a project evaluation is considered complete, particularly where significant environmental or Indigenous concerns remain unresolved. This should be supported by transparent reporting on how comments are considered and how they influence the final decision.

7. How should developing mitigation and monitoring recommendations be built into the project evaluation process?

WWF-Canada supports the inclusion of mitigation and monitoring within the proposed project evaluation process and recommends placing greater emphasis on monitoring of the effectiveness of mitigation measures and the use of monitoring results to inform future project evaluations and project risk categorizations. Monitoring recommendations should center Indigenous knowledge and support Guardian programs to evaluate whether measures are effectively avoiding or reducing identified impacts. Monitoring results should be publicly reported so that lessons learned from individual projects can strengthen the evidence base and inform future project evaluations and mitigation requirements.

WWF-Canada's recent review of mineral exploration activity impacts demonstrates why this is important. The review found scant evidence characterizing the impacts of activities like the construction/operation of roads, trails, water crossings and field camps, nor the effectiveness of mitigation measures. Limited monitoring and publicly available reporting make it difficult to evaluate environmental outcomes over time.

The PEP should incorporate a feedback mechanism into its five-year review where monitoring results are used to periodically review the effectiveness of mitigation measures and update the methodology used to classify projects as having lower or higher potential for impacts, including the predetermined exclusions in Appendix 2. Where evidence is limited, monitoring and transparent reporting can help build the evidence based needed to continuously improve future project evaluations and strengthen environmental decision-making.

We happily invite a follow up conversation if there are any questions about our submission.

Karen Saunders
VP Wildlife & Industry
WWF-Canada