



## Environment and Climate Change Canada

### RE: PDAC Submission on Advancing Environmental Justice and Addressing Environmental Racism in Canada – Submitted via online portal

The Prospectors & Developers Association of Canada (PDAC) is the leading voice of the mineral exploration and development industry, representing more than 8,200 members in Canada and around the world. PDAC advocates on behalf of companies and individuals who are engaged in the early stages of the mining cycle: prospecting, discovery, financing, and project development. These activities are not only the foundation of our mining industry, but they also uncover the necessary raw materials that support modern life and are essential to securing the minerals and metals required for clean technologies into the future.

PDAC's April 2024 [submission](#) on the *Right to a Healthy Environment under CEPA* already responds to many of the themes raised in the new federal consultation on Environmental Racism and Environmental Justice. Much of our position aligns with the first and fourth foundations of the new consultation, which define environmental justice and highlight Indigenous environmental leadership. A “healthy environment” is one where ecological, social, and economic conditions are well understood, and decisions are grounded in transparent regulations and data.

Our 2024 submission emphasizes evidence-based, science-driven decision-making, inclusive engagement with Indigenous communities, and balancing environmental protection with economic and social development. These points closely mirror the consultation's calls for procedural, recognition, and distributive justice, as well as the recognition of Indigenous knowledge systems within environmental governance.

A minor divergence lies in the treatment of environmental data and measurement. Our previous submission called for harmonized monitoring programs, pan-Canadian datasets, and cross-departmental coordination to track environmental health indicators such as air and water quality, species protection, and emissions. Our recommendations reflect quantifiable and biophysical measures. The new consultation, however, emphasizes community-driven data, disaggregated demographic information, and localized indicators that capture how environmental harm intersects with race, socio-economic status, and geography. However, without mechanisms to align these approaches, a dual emphasis on standardized indicators and localized, qualitative evidence risks fragmenting data collection efforts and slowing the implementation of effective policy.

The federal consultation introduces a broad framework for environmental justice that touches on a wide spectrum of issues that intersect with PDAC's work. While the mineral exploration sector operates within a robust regulatory system, and PDAC has long-standing guidance for early engagement, capacity-building, and transparent environmental stewardship (such as our [Driving Responsible Exploration](#) Toolkits), this consultation broadens the conversation to consider social inequities, historic patterns of exclusion, and the lived experiences of communities across Canada. In the following sections, we reflect on each of the four foundational pillars of the consultation.



## **Foundation 1 – Environmental Justice**

Environmental justice depends on whether communities have access to clear, timely, and relevant information about environmental risks and decision-making processes, and whether they are supported by effective mechanisms to raise concerns and receive meaningful responses. This includes access to understandable environmental data, clarity on regulatory processes, and mechanisms that ensure concerns are heard, responded to, and acted upon in a timely and proportionate manner. Achieving environmental justice does not mean preventing development, but rather ensuring that environmental, social, and economic considerations evolve in a balanced, evidence-driven manner. The federal role should focus on improving data accessibility, strengthening cross-departmental coordination, and clarifying when and how concerns are escalated or referred to provincial or Indigenous authorities.

## **Foundation 2 – Assessing, Preventing, and Addressing Environmental Racism**

Environmental racism occurs when communities face disproportionate environmental burdens or have insufficient influence over decisions affecting their lands, health, or future opportunities. This often occurs in the context of projects that serve broader national interests. Addressing this requires understanding structural barriers such as limited technical capacity, consultation fatigue, and historic inequities in infrastructure and services. Preventing environmental injustice starts with proactive federal leadership, including the establishment of clear, predictable biophysical markers for a healthy environment, guidance on what constitutes disproportionate environmental burdens, and long-term planning that enables communities to participate effectively in environmental governance. By setting these expectations early, particularly for nation-building projects tied to energy security, critical minerals, or infrastructure, the federal government can reduce uncertainty, avoid reactive decision-making, and ensure communities are informed, supported, and meaningfully engaged before project-level discussions begin.

## **Foundation 3 – Race, Socio-Economic Status, and Environmental Risk**

Tying race, socio-economic status, and environmental risk can flag where project-level mitigation depends on broader policy or infrastructure decisions. This requires data systems that connect environmental information with social and demographic realities. PDAC supports improving national datasets on air, water, land, and biodiversity while making them more accessible to communities, researchers, and proponents. Investments in education, harmonized mapping tools, user-friendly data platforms, and community-led monitoring can help Canadians better understand how environmental risks vary across regions.

## **Foundation 4 – Indigenous Environmental Justice**

Indigenous environmental justice requires respecting Indigenous rights, knowledge systems, governance structures, and community priorities. PDAC recognizes that Indigenous Nations are key partners in responsible exploration and that many already lead or co-lead environmental monitoring, impact assessments, and stewardship initiatives. The federal government can support both Indigenous communities and proponents by clearly articulating what Indigenous environmental justice means in practice across federal policies, assessments, and permitting



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processes. Predictable standards help proponents understand expectations early, reduce uncertainty, and avoid inconsistent application across regions or projects. Clear guidance also helps proponents design engagement and mitigation approaches that respect Indigenous rights while remaining proportionate to project scale.

We appreciate the opportunity to provide feedback and welcome any follow-up engagement. To answer questions or clarify any of the statements made above, please contact me directly ([jkilleen@pdac.ca](mailto:jkilleen@pdac.ca)).

Sincerely,

Jeff Killeen

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