



PDAC Response "One Project, One Review": Co-operation Agreements for the Assessment of Major Projects

The Prospectors and Developers Association of Canada ("PDAC"), on behalf of our 8,200+ individual and corporate members representing Canada's vital mineral exploration and development sector, is pleased to provide comments on the Impact Assessment Agency of Canada's (IAAC) approach to co-operation with provinces for reviewing major projects.

PDAC adamantly supports efforts to align provincial and federal approvals processes, enabling proponents to undertake more efficient, clear, and streamlined permitting processes for major projects. Whether this alignment is achieved through substitution or harmonization, all levels of agreement processes must be well defined before application within project approvals. Uniform application of clear processes across all proposed projects will ensure predictability for proponents, rightsholders, and stakeholders, and prevent delays stemming from government-to-government co-operation agreement negotiations.

Alignment of community of interest determinations must be a central component of co-operation agreements. For mineral projects in the Impact Assessment process, proponents are instructed to engage with an average of 7 Indigenous groups, up to as many as 15; more than 60% of projects see an increase in the number of communities to engage with from the Initial Project Description to the Indigenous Engagement Plan¹. Provincial and federal regulators must align their consultation spectrums and provide a rationale for this determination to proponents and communities to allow for early engagement and equitable agreements, where outcomes can be predicted in the first stages of project development. Current misalignments are causing significant uncertainty and, at times, conflict. There is a perception that the Crown consultation process within the IA creates conflict between First Nations; nearly 50% of participants from a [First Nations Energy and Mining Council survey](#) shared that their First Nation has disputed with another in relation to IAs on their territory, and fewer than 5% say these disputes were satisfactorily resolved.

In all cases, provincial regulators should be positioned as project leads. It is also crucial that co-operation agreements ensure consistency of information and formatting, and align timelines to allow for one regulatory approval that supplies information for others, where overlaps exist. This coordination will generate opportunities to combine consultation efforts, mitigating consultation burden and capacity strain.

In all cases where Impact Assessment processes apply, IAAC must limit information requirements to those necessary in determining and mitigating significant adverse impacts on areas of federal jurisdiction. When designation occurs, specific and explicit justification of how a project could potentially cause significant adverse effects within federal jurisdiction and how existing federal or provincial processes (under DFO, Species at Risk, etc.) are insufficient to address these concerns must be provided.

¹ Based on mineral projects currently undergoing the IAA and listed on the Canadian Impact Assessment Registry.



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20/10/2025

Scaling information requirements to these significant adverse effects within federal jurisdictions will ensure processes are targeted and proportionate. While many statements have been made to this effect, it remains that the IA's inclusion of positive and adverse effects on health, social conditions, economic factors, and sustainability is all beyond the scope of an environmental assessment and federal jurisdiction.

Thank you for your consideration on this matter. Please contact Jeff Killeen (PDAC Policy & Program Director) at jkilleen@pdac.ca should you wish to discuss our comments further.

Sincerely,

Jeff Killeen

PDAC Director, Policy & Programs