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**[Submitted Electronically]**

**RE: Discussion Paper: Strengthening One Canadian Economy through Trade and Transportation**

On behalf of the Prospectors & Developers Association of Canada (PDAC) and our more than 9,000 individual and corporate members, we offer commentary on the modernization of our National Transportation Policy from the perspective of Canadian mineral explorers and developers; the source of mineral discoveries and mines, and a cornerstones of all domestic industries.

The mineral sector is a foundational piece of Canada’s capacity to trade with the world: it drives domestic supply chain strength, diversification and performance, and accounts for more than one-fifth of domestic exports, or [\\$162 billion in export value in 2025](#). Canadian mines rely on public transportation and supply chain infrastructure to be economically feasible, even during the earliest exploration stages of the mineral value chain.

Figure 1 clearly demonstrates a correlation between mineral exploration and transportation infrastructure, showing how mineral exploration concentrates near existing access, and how transportation networks often expand as a by-product of mines becoming operational.

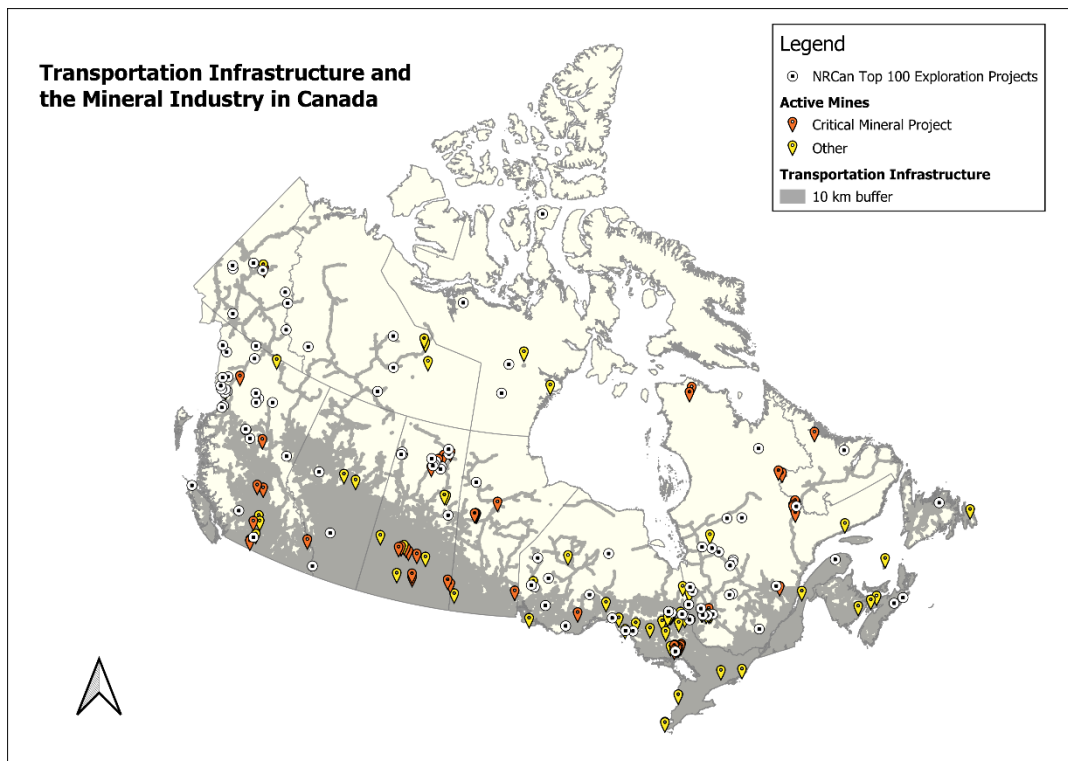


Figure 1 - Map of Canada showing mineral industry activity relative to a 10 km buffer around existing roads

Only 24% of land available for claim staking in Canada is within 10 km of an existing road and unlike many other industries, mineral explorers and miners have very little choice in determining where they can operate; exploration and development projects exist where economic mineral resources are discovered. With that in mind, mineral exploration is largely constrained within areas where geological potential coincides with areas where exploration is permitted, as shown in Figure 2.

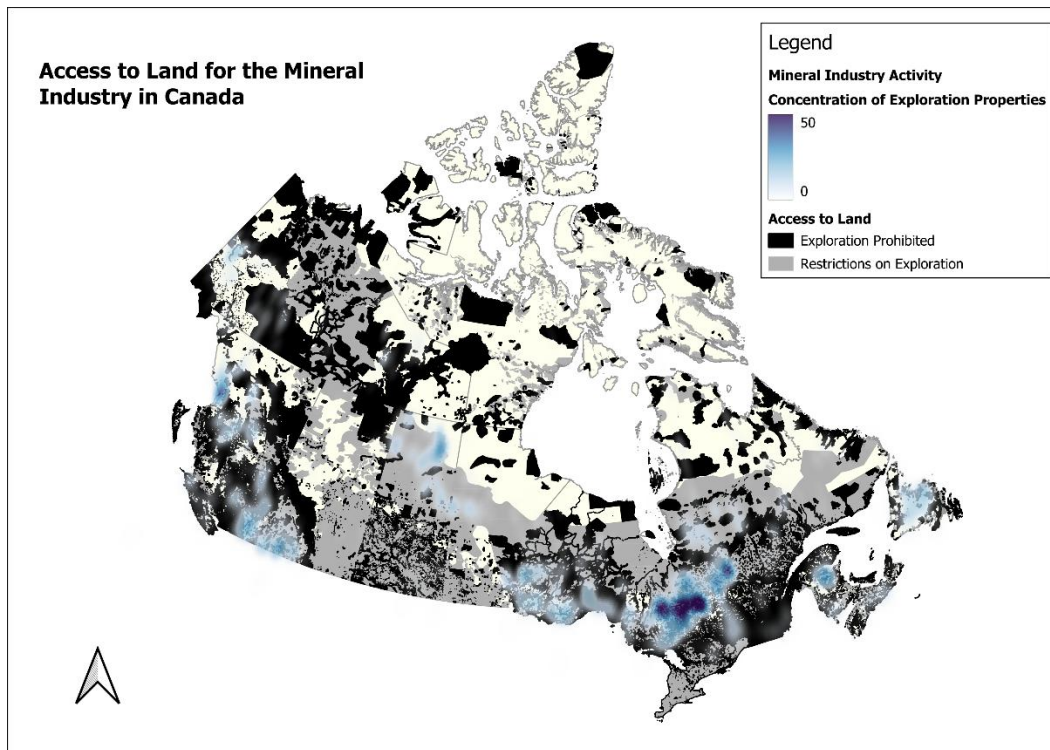


Figure 2 - Map of Canada showing mineral exploration activity relative to accessible land

Exploration projects in remote regions of Canada can face operating costs that are an order of magnitude higher than projects within close reach of road, rail and energy infrastructure. Similarly, the cost to build and operate a remote mine can be 2-3 times that of operations with comprehensive infrastructure in proximity. These complex factors are the foundation of PDAC and our members' interest in the *Strengthening One Canadian Economy through Trade and Transportation* discussion paper.

### Modernizing Transportation Policy and National Trade Corridors

PDAC supports the proposed addition of “supply chain efficiency” to section 5 of the *Canada Transportation Act* and the creation of ‘National Trade Corridors’, provided that these designations do not detract from infrastructure development in non-designated regions.

*Recommendation 1: Ensure that mineral supply chains are explicitly represented in corridor designation.*

The Discussion Paper describes National Trade Corridors as important routes for moving goods, with a focus on ports, railways, airports, trucking, and warehouses. PDAC urges the Government to ensure that the corridor designation process explicitly incorporates the full mineral supply chain, including the access routes, winter roads, and airstrips that link remote exploration and development sites to the broader transportation network. Corridors designed for supply chain efficiency that do not account for the earliest phases of those supply chains will fail to fully capitalize on the economic objectives of this modernization.

The importance of National Trade Corridors is also more pronounced in Canada's Arctic regions where mineral exports represent 95.6% of Yukon's exports, 99.6% of Nunavut's exports, and 99.9% of Northwest Territories' exports in 2025 (Natural Resources Canada and Statistics Canada). As such, targeted investment in trade corridors is essential not only to sustain this existing export base, but also to expand it by enabling highly prospective mineral districts in the Arctic to advance into production and significantly increase the region's long-term export capacity.

*Recommendation 2: Include mineral industry representatives on the proposed trade corridors advisory group.*

Mineral industry representatives must be present during these discussions to ensure the realities of the natural resource supply chain are fully captured in infrastructure studies, particularly given the industry's higher-than-average presence in remote and rural regions of Canada.

### **Simplify reporting (“Tell us once”)**

PDAC strongly supports the “Tell Us Once” initiative to reduce duplicative submissions across federal departments.

*Recommendation 1: Ensure that the “Tell us once” system is designed to accommodate technical and environmental data and is not limited to commercial or administrative information.*

A consolidated, cross-departmental information sharing system that reduces the need for proponents to re-submit the same baseline data, project descriptions, and environmental information to multiple departments would represent a meaningful reduction in administrative burden.

### **Reduce red tape and streamline regulations**

To support the trade objectives of the \$5 billion Trade Diversification Corridors Fund (TDCF) and the \$1 billion Arctic Infrastructure Fund (AIF), red tape reduction and streamlining efforts must be applied at the earliest stages of project exploration and development.

*Recommendation 1: Distinguish infrastructure and transportation needs from project impact assessments.*

Most mineral projects developed in Canada will require connection to road, rail, and/or ports to bring in supplies and transport extracted resources for downstream processing or sale. Oftentimes, existing transportation corridors that will be used for this transportation are included in the designated study area for projects undergoing environmental and impact assessments (“[...] study area boundaries must encompass the spatial boundaries of the Project, including any associated project components or activities [...] consider the following areas in assigning appropriate spatial

boundaries: [...] existing affected infrastructure.”<sup>1</sup>). This grouping can massively inflate the costs and information requirements of project assessments, while not accurately capturing the actual new and significant potential impacts of a project.

PDAC recommends removing areas of existing infrastructure from environmental baseline collection and study, excepting the standard assessment of potential impacts of change in use. For new infrastructure, PDAC further recommends distinguishing transportation infrastructure that would not otherwise qualify for an Impact Assessment from a project’s Impact Assessment, where applicable.

*Recommendation 2: Streamline approvals for low-impact remote access infrastructure.*

The Discussion Paper proposes to update railway construction rules, increasing the track length that can be constructed without section 98 approval from 3 km to 5 km, and clarifying that no approval is needed for projects reviewed under the *Impact Assessment Act*. PDAC supports both changes. PDAC further recommends that the Government review whether comparable thresholds and exemptions can be applied to other transportation infrastructures associated with mineral projects, including rail spurs, loading facilities, and roads, and that similar risk-proportionate exemptions be introduced where they do not currently exist.

Mineral exploration projects in remote regions depend on access: temporary airstrips, winter roads, helicopter landing pads, and seasonal water crossings. This infrastructure is often low-impact, temporary, and essential to conducting exploration activity. While some regulatory differentiation exists or is in development (such as the *Minor Works Order* under the CNWA and the proposed DFO codes of practice for temporary water crossings), these exemptions are conditional and bounded by strict criteria. Many forms of access in northern and remote regions still require the same federal authorization processes as permanent, high-impact infrastructure, generating disproportionate cost and delay for activities that pose minimal environmental risk.

PDAC urges Transport Canada to accelerate establishment of standardized exemptions or expedited approval pathways under the *Canada Transportation Act*, the *Navigable Waters Act*, and the *Fisheries Act* for temporary, low-impact access infrastructure that would support mineral exploration, with clear, pre-defined criteria and defined timelines.

*Recommendation 3: Address rail access constraints for remote mineral projects.*

For mineral projects located within reach of existing rail networks, access to rail service on fair and timely terms is essential to export viability. PDAC supports the Government’s commitment to improving corridor performance and urges that this includes specific attention to the service reliability and access terms available to mineral producers, particularly junior and intermediate producers who may lack the optionality available to larger industrial shippers, and are more vulnerable to service disruptions and cost escalation.

## Conclusion

Infrastructure availability is a significant determining factor in discovery, economic viability of project development, and downstream potential for Canadian minerals. PDAC is encouraged by the intentions reflected in this Discussion Paper and urges the Government to ensure that the mineral exploration and development sector — with its distinctive logistical challenges, its concentration in

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<sup>1</sup> Impact Assessment Agency of Canada, *Tailored Impact Statement Guidelines: Crawford Nickel Project*, Document Reference No. 92 (March 31, 2023)



remote and northern regions, and its central role in Canada's trade diversification objectives — is explicitly and meaningfully incorporated into the implementation of these proposals.

PDAC appreciates the Government of Canada's continued attention to the mineral industry's role in Canada's economic future, and thanks you for your consideration of this matter. Please contact Jeff Killeen (PDAC Policy & Programs Director) at [jkilleen@pdac.ca](mailto:jkilleen@pdac.ca) should you wish to discuss our comments further.

Kind regards,

A handwritten signature in blue ink, appearing to read 'JKilleen', written over a horizontal line.

*Jeff Killeen*  
*Director, Policy and Programs*