



Submission from the Ontario Society of Professional Engineers (OSPE)

ERO Notice 025-0409: Proposed Amendments to the Mining Act, Electricity Act, and Ontario Energy Board Act

Date: May 2025

The Ontario Society of Professional Engineers (OSPE) appreciates the opportunity to provide feedback on ERO Notice 025-0409, concerning proposed amendments to the Mining Act, 1990; Electricity Act, 1998; and Ontario Energy Board Act, 1998.

OSPE's Mandate:

OSPE represents Ontario's engineering profession, committed to advancing the public interest through science-based policy and sustainable infrastructure development. We are concerned that the proposed amendments may have significant implications for regulatory transparency, infrastructure planning, energy system resilience, and Ontario's long-term sustainability.

Key Concerns:

Regulatory Oversight and Accountability:

Streamlining approval processes must not come at the expense of independent oversight or rigorous engineering standards. We urge the government to ensure that any regulatory changes preserve strong accountability frameworks.

Infrastructure and Grid Resilience:

Amendments to the Electricity Act and related legislation must consider long-term grid stability, integration of renewable energy, and energy storage. Engineering expertise should inform any changes to how projects are planned, evaluated, and approved.

Environmental and Community Impacts:

Changes to the Mining Act must maintain strong environmental safeguards and uphold the duty to consult Indigenous communities. Engineering input is crucial to balancing resource development with environmental risk and sustainable land use.

Energy Affordability and Innovation:

Any reforms to the Ontario Energy Board Act should include mechanisms to protect consumers, support low-carbon innovation, and promote access to affordable, reliable energy services.

Recommendations:

- Ensure changes to all three Acts are guided by engineering best practices and sustainability principles.
- Maintain strong, independent regulatory oversight and risk assessment in infrastructure and energy development.
- Include engineers in consultations and advisory roles when shaping implementation frameworks.
- Align reforms with Ontario's climate goals and commitments to resilient infrastructure and energy systems.
- Enhance transparency and public participation in decision-making processes affecting resource and energy development.

Conclusion:

OSPE supports efforts to promote economic growth and energy modernization in Ontario, but emphasizes that such progress must be built on a foundation of strong engineering principles, regulatory accountability, and long-term sustainability. We urge the government to ensure that any changes to the Mining Act, Electricity Act, and Ontario Energy Board Act are inclusive of engineering expertise, environmentally responsible, and aligned with the public interest.

We thank you for the opportunity to provide input and welcome continued dialogue.