



INJURED WORKERS
COMMUNITY LEGAL CLINIC

**REPRESENTING INJURED WORKERS
FREE OF CHARGE SINCE 1969**
A community directed not for profit legal aid clinic

11 June 2026

Environmental Registry of Ontario
Consultation on Fortifying Ontario's Economy
By email to: criticalminerals@ontario.ca

Dear Ministry of Energy and Mines

Re: comment on policy vision paper: Fortifying Ontario's Economy

Injured Workers community Legal Clinic is a community legal aid clinic specializing in workers' compensation law. Our mandate includes providing legal advice and representation and providing submissions on law and policy reform relating to injured workers. Thank you for the opportunity to comment on the proposals for updating Ontario's Critical Minerals Strategy.

The Ontario government's vision in "Fortifying Ontario's Economy" begins by declaring that Ontario is an unapologetic champion of Canadian workers and minerals. The mining and quarrying industry already has one of the highest rates of workplace injury in Ontario and we are still learning about the health impact of past mining practices such as McIntyre powder causing Parkinson's disease. We submit that it would be appropriate to carry through your support for Canadian workers by declaring that there will be no compromise on workers' health and safety.

Under s.5 and 6 of the Special Economic Zones Act, the government can pass regulations that exempt a corporation or mining project from any provincial law or regulation or modify the application of any law. We expect the government does not want these exceptions to threaten the health and safety of Canadian workers and therefore we submit that this should be stated clearly in the regulations.

These sections of the Act provide that the exemptions are subject to conditions specified in the regulation. It is our submission that the government should state by regulation that there will be no exemptions from the *Occupational Health and Safety Act*, the *Workplace Safety and Insurance Act*, the *Labour Relations Act* and the *Employment Standards Act*. This will ensure that workers in the special economic zones will have the same health and safety protection as all workers in Ontario. A regulation like that will also contribute to the support of workers and organized labour for this work.

Thank you for the opportunity to comment on the proposal.

Sincerely,

A handwritten signature in blue ink that reads "John McKinnon".

John McKinnon
Executive Director