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Government of Canada  
Recipient Organization  
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June 4, 2026

**Subject: Getting Major Projects Built in Canada – Discussion Paper on Proposed Legislative, Regulatory, and Policy Reform**

Dear Privy Council Office,

This letter is in response to Government of Canada’s May 8, 2026 public notice on “Getting Major Projects Built in Canada – Discussion Paper on Proposed Legislative, Regulatory, and Policy Reform.”

The Initiative for Responsible Mining Assurance (IRMA) is a multi-stakeholder coalition founded in 2006 to answer the question “what is responsible mining?” In the twenty years since, diverse leaders representing directly affected mining communities, Indigenous-led organizations, NGOs, organized labor, mining companies, purchasers, and investors have crafted and refined the world’s first shared definition of what it means to mine responsibly: the *IRMA Standard for Responsible Mining*.<sup>1</sup> Our breadth and depth of engagement with Indigenous rights holders and stakeholders across jurisdictions is core to our culture, our membership model and our governance.<sup>2</sup>

With roots in Canada, IRMA now stands as a global organization governing the IRMA Standard and a robust system for independent third-party audits. More than 100 mining companies have engaged in the IRMA system, covering more than 47 types of minerals and materials in 39 countries, including Canada. Our focus on critical minerals has met with success: 53% of global lithium production, 42% of platinum group metals, 29% of nickel, and 17% of manganese are now produced by mines either self-assessing or independently audited under the IRMA system.

Market demand for IRMA-audited minerals is primarily led by companies in the tech sector (e.g. Apple, Google, Microsoft, HP, Intel) and the automotive sector (e.g. Ford, General Motors, Volkswagen, BMW, Mercedes-Benz, Renault, and Tesla).

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<sup>1</sup> [Initiative for Responsible Mining Assurance](#)

<sup>2</sup> [IRMA Board of Directors](#)

These companies have joined IRMA as members, helping to shape the IRMA Standard, while also asking suppliers to source inputs from IRMA-audited mines. Increasingly, investment institutions are now meeting with mining companies to add their voice and articulate the benefits of the IRMA system and a de-risked mining industry. Purchasers and investors alike seek to build robust mineral supply chains to help drive the energy and digital transitions.

Of relevance to this letter, IRMA also works day-in-and-day-out to ensure we have the continuous support of Indigenous leaders around the globe, upholding an IRMA Standard which protects their rights. In Canada, Indigenous leaders in British Columbia were present early in our development and provided crucial guidance as we built the Indigenous rights requirements for the IRMA Standard. We continue to collaborate closely with the BC Assembly of First Nations, the Union of British Columbia Chiefs, and the BC First Nations Energy and Mining Council – as well as Indigenous leaders from Russia, the United States, the Nordic countries, Indonesia, and Australia, as well as through global platforms such as the UN Permanent Forum on Indigenous Issues. Most recently, the Assembly of First Nations (AFN) adopted a resolution regarding IRMA, part of which specifically calls for the Government of Canada to support and adopt the IRMA Standard in collaboration with First Nations.<sup>3</sup>

## **Response to the Discussion Paper**

The Discussion Paper asks: “What opportunities do you see emerging from these proposals to improve the assessments and permitting processes related to building major projects?”

Concerns have been raised that in seeking to accelerate the assessment and permitting process the Government risks undermining Indigenous rights and environmental protections.<sup>4</sup> We suggest that should Indigenous leaders in Canada conclude that Indigenous rights and environmental safeguards have been sacrificed in the name of speed, trust will be broken, protests will occur, and legal actions will be launched. Moving forward too quickly on this consultation and future regulatory reform risks further delay, moving in the opposite direction of the Government of Canada’s objectives of enhancing efficiencies and improving timelines for project development. Trust is the most precious of commodities.

In this context, we believe that the Government of Canada now has an opportunity to affirm its commitment to environmental and social impact assessments as well as commitments to Indigenous rights as set out in Section 35 of the Constitution of Canada, the United Nations Declaration on the Rights of

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<sup>3</sup> [AFN Resolution on IRMA](#)

<sup>4</sup> [McCarthy Tetreault Review](#) and [AFN Chief Warns Against Changes](#)

Indigenous Peoples Act, as well as commitments made in the Critical Minerals Strategy (2022), the Major Projects Office and its Indigenous Advisory Council, and the Discussion Paper to which we are responding. Affirmation requires that the Government backs its commitments with action and ensures that environmental and social safeguards and Indigenous rights are adopted in practice, not just in words, as mineral projects are reviewed and approved.

As a first step, we believe there is merit in lengthening the consultation process to address the concerns that have been raised by Indigenous leaders so that this important initiative starts off on the right foot. We also recommend that the Government of Canada review the IRMA Standard and our audit process when revising its regulations. Both elements of this system, built by hundreds of stakeholders and rights holders globally, reflect a forward-looking stance on how responsible mining projects can be undertaken, step by step. We also recommend that the Government of Canada meet with the Assembly of First Nations and IRMA to explore how IRMA assessments can simultaneously protect Indigenous rights and provide value for the mining industry.

In addition, we invite the Government to review our requirements specific to Indigenous rights. The IRMA Standard contains more than 400 requirements grouped in 26 chapters under four pillars: Business Integrity, Planning for Positive Legacies, Social Responsibility, and Environmental Responsibility. Our requirements specific to Indigenous rights are provided primarily in Chapter 2.2: Free, Prior, and Informed Consent. In this Chapter, we specify auditable requirements regarding meaningful engagement, remedy of impacts, and respect for free, prior, and informed consent. Indigenous rights are also embedded in Chapter 1.3 on Human Rights Due Diligence, Chapter 1.4 on Grievance Mechanisms and Access to Remedy, and Chapter 3.3 on Community Health and Safety.

IRMA is available to meet to discuss the IRMA Standard and the benefits it brings to the mining industry, stakeholders, and rights holders. In the 20 years of our existence, we have acquired significant expertise and awareness that trust takes time to build but can erode rapidly. The long-term value of trust-building actions, including meeting early with Indigenous leaders, ensuring their willingness and capacity to engage, and respecting their governance practices and culture are necessary conditions for project success.

Thank you again for the opportunity to comment on the Discussion Paper.

With Best Regards,

A handwritten signature in black ink, appearing to read "Kristi Disney Bruckner".

Kristi Disney Bruckner  
Law & Policy Director

A handwritten signature in black ink, appearing to read "Robert Walker".

Robert Walker  
Sector Lead, Finance