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Study on the Nexus Between National Defence, National Security and Canada's Critical Minerals Sector

A Brief by MiningWatch Canada

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Executive Summary

As international institutions erode and “middle powers” like Canada find themselves on the front lines between three imperial powers – the United States, Russia and China – several voices are calling for Canada to exercise greater control over its mineral resources to protect national security and sovereignty. At their most extreme, these fears raise the possibility that foreign states could use so-called critical minerals for economic, industrial or military purposes in a manner hostile to Canada’s security and sovereignty.

At the turn of the decade, the Quebec government established the first plan concerning so-called critical minerals. Since then, the Government of Canada and other provincial governments have adopted their own critical mineral strategies and lists. While these plans and strategies each vary slightly, they share a common premise: minerals are considered “critical” primarily because of the purely economic issue of their role in global supply chains. Contrary to what industry and government promotional and advertising campaigns have been trying to impress upon people since the early 2020s, it is certainly not necessary for these mineral substances to be used for the energy transition in order for them to be designated as “critical”.

At the constitutional level, the Government of Canada is expected to collaborate with provincial governments on the issue of the nexus between so-called critical minerals, national defence and national security. In our view, the most effective way to control access to minerals begins at the earliest stages of the mining cycle. However, despite the “security” threat that many provincial governments have been raising for several years now regarding the participation of hostile foreign states in the mining sector under their jurisdiction, we see virtually nothing in the recent bills introduced by these governments that would allow them to gain better control over their mineral resources.

At the moment, the Government of Canada and provincial governments seem more concerned about deterring foreign investors or erecting trade barriers than they are about seeing foreign states turn minerals extracted from Canadian soil against us.

Without classified information on this subject, we do not believe it is the role of an organisation such as ours to comment on the actual risk of aggression against Canada by the United States, China or any other foreign entity, whether or not they use so-called critical minerals from Canadian soil.

However, the idea that there may be an imminent threat or hostile takeover of Canada’s mineral resources by a foreign state is diminished by the level of cooperation shown by the Government of Canada with the United States government, including the Department of War, in the joint development of numerous mining projects deemed critical or of national importance, and by the diplomatic rapprochement between the Government of Canada and China.

For the sake of consistency, the Government of Canada — and the provincial and territorial governments — should adopt a more transparent approach and clearly communicate to the public whether it intends to tolerate, accept or refuse foreign state access to and control over Canada’s critical minerals within global supply chains. These positions should then be reflected in policy by limiting cooperation with, and restricting access for, foreign entities that are hostile to Canada’s security.

One thing is certain: further damage to the environment and to the rights of Indigenous peoples and local communities is to be expected if Canada pushes for increased mining production for military, national

security, or national defence purposes. It is inconceivable that the impacts of mining will be reduced in a context of mining industry expansion. Although we strongly doubt that there is a technologically feasible way to do this, it is imperative that the Government of Canada demonstrate how its defense policies and action plans related to critical minerals are compatible with a reduction in its greenhouse gas emissions and that real action is taken to limit the environmental impacts of the extraction and use of so-called critical minerals.

Along with a large segment of civil society, we denounce the diversion of funds, resources and efforts needed for the energy transition in the name of national security. In our view, the only way to meet mineral production targets for all sectors, including the energy transition, national defence and national security, is to aim instead for mineral sobriety, i.e., to reduce Canada's overall overconsumption of critical minerals. The climate emergency is a real and present danger to national security, not just a vague geopolitical threat. We cannot negotiate peace with a warming climate.

Under no circumstances should Canada's mineral resources be used as weapons of aggression or genocide. The Government of Canada must make firm commitments in this regard and establish a transparent and credible system for tracking its critical minerals.

The bills introduced by the Government of Canada and the provinces should not allow for the fast-tracking of permits to mining companies or foreign entities that are hostile to Canada's national security. There is every reason to fear that political pressure to fast-track permits to mining companies, combined with increased demand for minerals for national defence and energy transition sectors, will open the door to authorising mining projects that are harmful and dangerous to the safety of workers, local communities, the climate and the environment. The Government of Canada must also take a clear and firm position that the country's military supply chains cannot rely on seabed mining.

We emphasise the crucial importance that Canada must not rely on uranium mining nor the use of nuclear energy, for national defence, national security, energy transition or any other purpose. It is impossible to separate uranium mining for the nuclear energy sector from that used in the nuclear weapons sector. We believe that the claim that uranium mining and the use of nuclear energy could contribute to energy security is misleading. On the contrary, this approach would increase our exposure to risks and threats that undermine our national security.

Both domestically and internationally, the Government of Canada and many provincial governments, assert that Canadian jurisdictions stand apart from other mining jurisdictions around the world in their ability to produce not only "critical" minerals, but also "responsible" minerals. We do not share this view. Before daring to make such a claim, the Canadian and provincial governments should enshrine the United Nations Declaration on the Rights of Indigenous Peoples in mining legislation so that free, prior and informed consent is mandatory before any mining licence is issued.

In the same spirit, we invite the Standing Committee on National Defence to recognize that safeguarding clean water and air is vital to Canada, its national defence and its national security.

To ensure national security and the maintenance of supply chains, the Government of Canada and provincial governments should focus their efforts on achieving mineral sobriety across all minerals and sectors, including the national defence sector.

The reuse and recycling of critical minerals must be prioritised in government investments, provided that these measures do not jeopardise public health and the environment.

List of recommendations:

Recommendation #1: Any new mining legislation introduced in Canadian legislative assemblies should give authorities greater leverage over access to and control of mineral resources.

Recommendation #2: A clearer and more transparent approach should be adopted with regard to whether Canada intends to tolerate, accept or refuse foreign state access to and control over its critical minerals, and these positions should then be reflected in policy through limited cooperation and restricted access to critical minerals for hostile foreign entities.

Recommendation #3: The Government of Canada must ensure and demonstrate that its national defense policies and action plans are compatible with the reduction of greenhouse gas emissions, and that they lessen the environmental impacts associated with the extraction and use of critical minerals.

Recommendation #4: The Government of Canada should focus investments, resources, and efforts on achieving mineral sobriety in all areas, including the national defense sector.

Recommendation #5: The reuse and recycling of so-called critical minerals should be prioritized in government investments, provided that these measures do not endanger public health and the environment.

Recommendation #6: The Government of Canada should make firm commitments and establish a transparent and credible traceability system for its critical minerals to assure the public that they are not used in the creation or proliferation of weapons used in violation of international law, including in genocides, whether these weapons are used by Canada or a third country

Recommendation #7: Canadian legislation must not allow for the fast-tracking of permits to companies that are supported by any foreign entity hostile to Canada's national security.

Recommendation #8: Policies to accelerate mining projects must not weaken nor roll back environmental regulations and standards.

Recommendation #9: A complete ban on seabed mining activities should be implemented in Canada and internationally, and the national defense sector must not be exempt.

Recommendation #10: Uranium should be removed from critical mineral lists and Canada should avoid expanding its use and reliance on nuclear energy.

Recommendation #11: The Government of Canada must avoid and minimize any mining activity that could cause serious damage to fresh water and clean air.

Recommendation #12: The Government of Canada and the provinces and territories' governments must end the free-entry mining system and fully implement the UN Declaration of Rights of Indigenous Peoples, especially with regard to Free, Prior and Informed Consent – including the right to say no.

About our Organisation

Founded in 1999, MiningWatch Canada is now comprised of 25 member organizations representing, collectively, several hundred thousand individuals across Canada. Over the past 27 years, MiningWatch has become a key player, with more than 200 investigations, interventions, reports and legal actions on as many mining projects nationally and internationally. The environment, human rights, Indigenous rights, transparency and corporate accountability are all issues that drive MiningWatch's advocacy at both the community and public policy levels. MiningWatch is a founding member of the advisory committee for the National Initiative for Orphan and Abandoned Mine Sites (INMOA-NOAMI, federal/provincial), as well as for the national Mine Environmental Drainage Neutralisation (MEND) programme. MiningWatch has also been a member of the Ontario Minister of Mines' advisory committee, the federal environmental assessment reform committee, and the national inquiry by the Commissioner of the Environment and Sustainable Development on the application of the federal Metal and Diamond Mine Effluent Regulations in Canada. MiningWatch has been involved in approximately 20 legal actions, including four in Federal Court and the Supreme Court of Canada, related to mining issues in Canada.

Our Analysis on the Subject

Many consider the question of access to and control over mineral resources to be one of the biggest issues currently facing the mining sector in Canada. More specifically, concerns have been raised about the possible appropriation of these mineral resources by companies or states with interests opposed to those of Canada. At their most extreme, these fears raise the possibility that foreign states could use these minerals for economic, industrial or military purposes that are hostile to Canada's security and sovereignty.

It is against this backdrop that the House of Commons Standing Committee on National Defence wishes to examine the “the nexus between national defence, national security and Canada's critical minerals sector.”

In the following ten chapters, MiningWatch Canada offers its analysis of the subject and submits its recommendations on how to address these issues.

The state of play on so-called critical minerals

As the scope of this study focuses on “Canada's critical minerals sector,” our comments begin with a discussion of the origin, meaning and scope of the use of the term “critical minerals” by governments to refer to certain minerals that are in high demand in the country.

Quebec was the first jurisdiction in Canada to use this term in October 2020 in the first draft of its 2020-2025 Quebec Plan for the Development of Critical and Strategic Minerals.¹ According to this plan, the Quebec government “considers critical minerals to be those that are currently of economic importance to key sectors of our economy, that present a high supply risk, and that have no commercially available

¹ Gouvernement du Québec, Ministère de l'Énergie et des Ressources naturelles, *Plan québécois pour la valorisation des minéraux critiques et stratégiques 2020-2025*, 2020, [online].

substitutes.” As for so-called strategic minerals, the Quebec government defines them “as mineral substances necessary for the implementation of various Quebec policies.”

These definitions have evolved slightly in the recently published Quebec Strategy for the Development of Critical and Strategic Minerals (January 2026), which defines critical and strategic minerals (CSMs) “as minerals that are essential to key sectors of the economy and whose supply is considered uncertain or vulnerable (critical minerals) and necessary for the implementation of its policies (strategic minerals).”²

Two years after Quebec’s plan, in 2022, the federal government published its Canadian Critical Minerals Strategy.³ Originally, Canada’s list of critical minerals identified thirty-one (31) minerals. Today, thirty-four (34) minerals are on the list.⁴ Among these, “the Strategy prioritises six that stand out for their potential to drive Canadian economic growth and because they are necessary inputs in priority supply chains.”⁵

Other provincial governments have since adopted plans or strategies to support the development of critical minerals, which are largely consistent from one jurisdiction to another: thirty-four (34) in Newfoundland and Labrador,⁶ thirty-three (33) in Ontario,⁷ twenty-eight (28) in Quebec,⁸ and twenty (20) in Nova Scotia.⁹ British Columbia, Saskatchewan and Manitoba, for their part, have simply adopted the Government of Canada’s list of thirty-four (34) critical minerals.¹⁰ Instead of creating its own list, Alberta is presenting its “potential” to supply the needs for twenty-eight (28) different critical minerals listed as such by the Government of Canada, the United States, the European Union and Japan.¹¹ New Brunswick has not yet unveiled its “final strategy” on critical minerals, but for the time being also refers to the Government of Canada’s list.¹²

Like Quebec, Nova Scotia has adopted a dual-list strategy referring to two distinct terms, critical and strategic. The latter is defined in the maritime province as “targeting economic drivers or other benefits” and only designates four minerals as such.

As a general rule, however, most jurisdictions in the country base their mineral policies solely on the concept of “critical minerals.” For the purposes of this brief, we will refer to the list of thirty-four (34) so-called “critical” minerals published by the Government of Canada¹³:

² Gouvernement du Québec, Ministère des Ressources naturelles et des Forêts, *Stratégie québécoise pour la valorisation des minéraux critiques et stratégiques*, [online], Appendix 1.

³ Government of Canada, Natural Resources Canada, *The Canadian Critical Minerals Strategy*, 2022, [online].

⁴ *Ibid.*, Appendix A, p. 40.

⁵ *Ibid.*, p. 9.

⁶ Government of Newfoundland and Labrador, *Provincial Government Releases Critical Minerals Plan*, November 1 2023, [online].

⁷ Government of Ontario, *Ontario’s Critical Minerals Strategy*, March 2022, [online], pp. 15 and 16.

⁸ Government of Canada, Natural Resources Canada, *The Canadian Critical Minerals Strategy*, *op. cit.*

⁹ Government of Nova Scotia, *Nova Scotia’s Critical Minerals Strategy*, November 2025, [online], pp. 12–14.

¹⁰ Government of British Columbia, *Critical minerals strategy in B.C.*, 2 April 2025, [online]; Government of Saskatchewan, *Saskatchewan’s Critical Minerals Strategy*, March 2023, [online]; Government of Manitoba, *News Release – Manitoba, Manitoba government releases Strategy to secure province’s mineral future*, 4 November 2024, [online].

¹¹ Government of Alberta, *Alberta’s Critical Minerals Potential*, April 2023, [online].

¹² Government of New Brunswick, *New Brunswick’s Detailed Mineral Strategy Framework*, [online].

¹³ Government of Canada, *Canada’s critical minerals*, [online].

Aluminium	Fluorine	Platinum	Silicon metal
Antimony	Gallium	Iron Ore	Tantalum
Bismuth	Germanium	(High purity)	Tellurium
Caesium	Graphite	Molybdenum	Titanium
Chromium	Helium	Nickel	Tungsten
Cobalt	Indium	Niobium	Uranium
Copper	Lithium	Phosphorus	Vanadium
Rare earths elements	Magnesium	Potash	
Tin	Manganese	Scandium	

The Government of Canada’s definition of “critical minerals” has evolved since it was first published in 2022. Today:

To be considered a critical mineral in Canada, a mineral must meet both of the following criteria:

- the supply chain is threatened;
- there is a reasonable chance that the mineral could be produced by Canada.

It must also meet one of the following criteria:

- be essential to Canada’s economic or national security;
- be required for the national transition to a sustainable, low-carbon and digital economy;
- position Canada as a sustainable and strategic partner within global supply chains.¹⁴

There are two key takeaways with regard to the use of the term “critical minerals”. First, not every mining project necessarily involves “critical minerals”. For example, Gold, while it is the leading mineral produced in the country with a value of around 20%, is not included in the list of so-called “critical” minerals.

Second, contrary to what industry and government promotional and advertising campaigns have been trying to impress upon people since the beginning of the decade, it is not at all mandatory that these minerals be used for the energy “transition.” On the contrary, the common thread in the federal and provincial definitions is the purely economic issue of “supply chains.” The Quebec government does not hesitate to state outright that “CSMs are minerals whose supply is considered vital to our modern economy.”¹⁵

In other words, to be considered critical, a mineral must be in high demand on the markets or be necessary for the manufacture of a particular product.

Based on this fact, we understand that the Standing Committee wishes to focus its attention on the use of so-called “critical” minerals in the national defence and national security sectors.

¹⁴ *Ibid.*

¹⁵ Gouvernement du Québec, Ministry du Conseil exécutif, *Le pouvoir québécois : réponse au nouveau contexte mondial*, 10 November 2025, [[online](#)].

1. Access to and control of mineral resources

Under the Constitution Act, 1867, the provinces of the Canadian federation have exclusive jurisdiction over “the exploration [...], exploitation, conservation and management of non-renewable natural resources,” which encompasses the main operations of the mining cycle.¹⁶ The Parliament of Canada has exclusive legislative authority over various areas that are directly or indirectly related to the subject of the study, including “the defence of the country” and “the regulation [...] of trade.”¹⁷ Given the wide-ranging causes and consequences of the mining sector, federal and provincial governments must take complementary action in a wide range of areas, from the environment to pricing, not to mention the rights of Indigenous peoples.

In short, both the House of Commons and provincial legislatures have the authority to intervene within their areas of jurisdiction on the issue of mineral resource management. The Canadian Constitution therefore requires all levels of government to collaborate if a “Canada-wide” objective is to be achieved in regulating access to and control of minerals for national defence and national security.

In our opinion, effectively regulating access to minerals begins at the earliest stages of the mining cycle. That said, it is the provinces that have the powers and responsibility to regulate the conditions for issuing or refusing mining rights at the mineral exploration stage.

Despite years of provincial governments warning about “security risks” posed by hostile foreign states in the mining sector, recent legislation contains virtually no concrete measures which would allow them to strengthen their control over mineral resources within their jurisdictions. In Quebec, for example, we recently published and presented a brief to the National Assembly in which we reported that we had not identified any provisions since November 2024 aimed at better informing the government about the identity and interests of mining rights holders.¹⁸

The issue of control over mineral resources goes beyond access. However, the same observation applies. For example, on 10 November, the Quebec Ministry of the Executive Council published its “response to the new global context” in which Premier François Legault stated that “we must obtain better control over our infrastructure and natural resources.”¹⁹ Yet, few if any measures have been adopted in Quebec or elsewhere in Canada to give responsible ministers the authority to ensure full control over the destination and use of minerals extracted in their territories.

In principle, the federal and provincial governments — not mining companies, and certainly not foreign states — have the authority to act. If current mining laws lack discretionary powers, governments could simply pass legislation allowing them to take further action in this area.

For now, the Government of Canada and provincial governments appear more concerned about deterring foreign investors or erecting trade barriers than about the possibility that foreign states could turn minerals extracted from Canadian soil against them.

¹⁶ *Constitution Act, 1867*, 30 & 31 Vict., c. 3 (UK) (hereinafter “Constitution Act, 1867”), s. 92(A), para. 1(a) and (b).

¹⁷ *Ibid.*, s. 91, para. 1(2) and (7).

¹⁸ MiningWatch Canada, Coalition Québec meilleure mine and Eau Secours, *Mémoire sur le Projet de Loi 11 modifiant diverses dispositions principalement aux fins d’allègement du fardeau réglementaire et administratif*, February 1 2026, [[online](#)].

¹⁹ Gouvernement du Québec, *Le pouvoir québécois : réponse au nouveau contexte mondial*, op. cit., p. 15.

It should also be noted that governments also fear being sued for compensation by multinational mining companies if they were to order the cessation of activities or take back control of operations at certain mining sites. This reality is neither new nor unique to the issue of national defence or national security. For decades this has limited government action, as shown by the virtual absence of procedures to revoke mining claims during land use conflicts, the creation of protected areas or Indigenous rights disputes.

Minerals can only be considered critical if they can be controlled in the interests of Canada's provinces and territories, not those of powers that threaten them. To remain consistent with their own critical mineral strategies, the Government of Canada and provincial governments should address this issue directly.

Recommendation #1: Every mining bill introduced in Canadian legislatures should strengthen government control over mineral resources, something current legislation largely fails to do.

2. Foreign investment and its consequences

Foreign investment in the mining sector has always been a form of foreign interference, supporting and encouraging projects without regard for the national policies of Canada and its provinces and territories. Whether through equity or shareholdings, these foreign investments circumvent or put pressure on internal decision-making processes and reduce the effective capacity of the Canadian state and provincial and territorial governments to control access to deposits and the use of minerals within their borders.

The mandate of the Standing Committee on National Defence requires it to pay “particular attention to investments made by the United States Department of Defense, China and other foreign entities and their consequences.”

Without classified information on this matter, we do not believe it is appropriate for an organization such as ours to comment on the actual risk of aggression against Canada by the United States of America, China or any other foreign entity, whether or not they use “critical minerals” from Canadian soil.

Regarding the United States

For several months, we have been closely monitoring and documenting the increase in investments in Canada by the US Department of Defense and other branches of the US administration. Canada is not the only country affected by this situation. Across North America, the Pentagon is deploying various strategies to secure access to critical minerals in order to increase its mineral reserves, whether by directly financing mining projects or by becoming a shareholder in mining companies. It should be noted that the United States is also seeking to increase its mineral production within its own borders. On 20 March 2025, President Donald Trump signed an executive order to this effect, invoking his emergency powers.²⁰

We know that the Pentagon has invested at least \$62.6 million USD in Canada, or approximately \$85 million CAD, in five mining, refining or battery production projects located in five different provinces and territories:

- The Sisson mining project in New Brunswick by Northcliff Resources (\$15 million USD);
- The LFP battery plant project in Quebec and British Columbia by Nano One Materials Corp (\$12.9 million USD);

²⁰ Earthjustice, *Earthjustice Responds to Trump Minerals Executive Order*, 20 March 2025 [[online](#)].

- Fortune Metals' NICO mining project in the Northwest Territories and Alberta (US\$6.4 million);
- Lomiko Metals' La Loutre mining project in Quebec (US\$8.3 million); and
- Electra Battery Materials Corp's cobalt refinery in Ontario (US\$20 million).

Vancouver-based Trilogy Metals has also announced a \$35 million USD investment from the US Department of War to support its operations in the field of critical minerals.²¹

But US interests are not limited to the direct involvement of the Department of War. As reported by the Journal de Montréal's investigative bureau last week, "the [US] government committed last year to providing US\$172 million to Nouveau Monde Graphite (NMG), which plans to open a mine in Saint-Michel-des-Saints in 2029."²² These funds come from the Export-Import Bank of the United States (EXIM).

Several US companies are acquiring thousands of mining claims in Canada, including more than half a million hectares in Quebec, in the hope of selling their projects to the Pentagon or other entities in the US military-industrial complex.²³ Grouped together in various consortiums seeking to court the US military, these companies do not hesitate to establish partnerships with Canadian state-owned companies such as the Société québécoise d'exploration minière (SOQUEM) or other Canadian exploration companies such as Exploration Azimut.²⁴ Two of these companies, Focus Graphite and Mont Royal Resources, have together spent CAD\$36 million on their exploration campaigns in Quebec to date.²⁵

Furthermore, Silicon Valley billionaires are directly involved in financing mining companies such as KoBold Metals, which are actively searching for so-called critical minerals in Nunavik, in northern Quebec, notably through the use of artificial intelligence.²⁶

Furthermore, there are personal ties between the US president and the heads of investment funds and mining companies behind the development of projects involving so-called critical minerals in Canada. Donald Trump's allies are pushing for the approval of the Strange Lake mining project on the border between Quebec and Labrador. The Cerberus investment fund has provided \$50 million USD in support, through one of its subsidiaries, to Torngat Metals, the company spearheading this rare earth project, which also includes the construction of a plant in Sept-Îles.²⁷ Steve Feinberg, co-founder of the Cerberus fund, was appointed Assistant Secretary of the US Department of War in March 2025. Until October 2025, the chairman of the board of directors of Torngat Metals was Thomas F. Gilman, one of the authors of Project 2025, the ultra-conservative political platform developed by Donald Trump's team during the 2024 presidential election campaign. He suddenly resigned from his position following our criticism of

²¹ The Tye, *Why Is the US War Department Buying into a BC Mining Company?*, Amanda Follett Hosgood, 16 October 2025, [online]; Trilogy Metals Inc., *Trilogy Metals Announces Strategic Investment by US Federal Government*, 6 October 2025, [online].

²² Journal de Montréal, *Les Américains avides des minéraux critiques du Québec*, Dominique Cambron-Goulet and Nora T. Lamontagne, 28 February 2026, [online].

²³ *Ibid.*

²⁴ *Ibid.*

²⁵ *Ibid.*

²⁶ *Ibid.*

²⁷ *Ibid.*

the company's double standards and its relations with the President of the United States, as reported by Radio-Canada in October 2025.²⁸

This list is not exhaustive and represents only a fraction of US investments and interests in companies and projects involving so-called critical minerals located in Canada. This situation is not new and began well before Donald Trump's return to the White House. A US diplomat confirmed in June 2024, under the Joe Biden administration, that "there are others in the pipeline."²⁹

Regarding China

On 28 October 2022, the Government of Canada stated that it would "take decisive action when investments pose a threat to our national security and critical mineral supply chains."³⁰ This announcement, made pursuant to the Investment Canada Act, specifically targeted "major transactions proposed by foreign state-owned enterprises affecting Canada's critical minerals sectors."³¹

A week later, Canada's Minister of Innovation, Science and Industry "ordered three Chinese companies to sell their stakes in firms mining [critical minerals] in Canada."³² These orders were issued to Sinomine (Hong Kong) Rare Metals Resources Co. Limited, Chengze Lithium International Limited, and Zangge Mining Investment (Chengdu) Co. Ltd.³³

Since then, we have seen little action of this kind taken by the Canadian government, or even mining projects actively supported in Canada by Chinese companies or the Chinese state.

The last decade has nevertheless been marked by significant political and diplomatic tensions between the two countries, leading to the imposition of various trade barriers on both sides in various sectors of the economy. These tensions have eased considerably recently following a rapprochement between the leaders of China and Canada. To date, no commercial announcements appear to have been made regarding the critical minerals sector.

The fact remains that China has largely dominated the global scene for several years in the mining and processing of several critical minerals, including rare earths. It can reasonably be argued that it is largely in an attempt to offset China's dominance of the mining sector's "supply chains" that Canada and its provinces and territories, like several other Western countries, have decided to develop their own strategies and lists for critical minerals.

²⁸ Radio-Canada, *Un allié de Trump supervise un projet minier québécois*, Alban Normandin and Renaud Chicoine-McKenzie, 22 October 2025, [online]; Radio-Canada, *Thomas F. Gilman remplacé comme président de Métaux Torngat*, Renaud Chicoine-McKenzie, 28 October 2025, [online].

²⁹ Le Journal de Montréal, *Investissements de la Défense américaine dans nos minéraux critiques: «Il y en a d'autres dans le processus», confirme un diplomate*, Francis Halin, 4 June 2024, [online].

³⁰ Government of Canada, Statement, *Canada strengthens guidelines to protect critical minerals sectors from foreign state-owned enterprises*, 28 October 2022, [online].

³¹ *Ibid.*

³² La Presse Canadienne, *Le Canada ordonne à des entreprises chinoises de céder leurs investissements*, Mia Rabson, 2 November 2022, [online].

³³ *Ibid.*

Concerning the European Union

The European continent, faced with high population density and few known mineral deposits to meet its industrial demand, also covets Canada's mineral resources. This observation led the European Commission to draw up a list in 2025 of 60 strategic projects for the extraction, processing, recycling and substitution of minerals.³⁴ Among them is the Dumont Nickel mining project in Quebec, despite the serious environmental risks it poses.³⁵ The Quebec government also recently announced the allocation of a "large energy block" to this mining project.³⁶

Regarding so-called trusted allies

The least that can be said is that the Government of Canada and the provinces are difficult to follow when it comes to their identification of "the other," i.e., third countries or foreign entities against which the country should close access to and control of its mineral resources. From a civil society perspective, despite a climate of mistrust towards the world's major foreign economic powers (mainly China, the United States and Russia), it is difficult to know what specific position Canada intends to take towards each of them on this issue.

Thus, despite more than a year of repeated threats of annexation by the President of the United States, specifically based on that country's desire to access rare earths and other critical minerals, the Government of Canada and the provincial and territorial governments have never clearly or directly expressed the need to close off access and control by the United States to the country's critical minerals.

For example, the Government of Quebec, in its "Response to the New Global Context" published in November 2025, argued that "relying on dependence [on the United States] is not sustainable."³⁷ But barely two months later, the same government backtracked on its remarks, stating in its Quebec Strategy for the Development of Critical and Strategic Minerals that "it is particularly mutually beneficial for Quebec and the United States to collaborate more closely in order to develop integrated and competitive Canada-U.S. value chains to counterbalance certain monopolies."³⁸

The same interpretation applies to recent actions taken by the Government of Canada. In November 2025, following the tabling of its first budget, Mark Carney's Liberal government designated Northcliff Resources' Sisson mining project in New Brunswick and Nouveau Monde Graphite's Matawinie mining project in Quebec as "projects of national significance" and submitted them to its Major Projects Office, despite the fact that both of these critical mineral projects are actively supported by the United States Department of Defense.³⁹ There is also considerable confusion surrounding the collaboration between Natural Resources Canada (CAD\$3.6 million) and the Pentagon (US\$8.3 million) in jointly funding the development of the La Loutre open-pit graphite mine project in Quebec. The same is true of the NICO

³⁴ European Commission, Selected Strategic Projects, 25 March 2025, [online].

³⁵ Business and Human Rights Centre, Strategic projects for whom? Challenges and local realities of the European Union's strategic mineral projects, 17 November 2025, [online].

³⁶ Le Journal de Québec, *Minéraux stratégiques: une autre mine en Abitibi obtient un «gros bloc énergétique»*, Gabriel Côté, 22 September 2025, [online].

³⁷ Gouvernement du Québec, *Réponse au nouveau contexte mondial*, op. cit., p. 15.

³⁸ Gouvernement du Québec, *Stratégie québécoise pour la valorisation des minéraux critiques et stratégiques*, January 2026, [online], p. 33.

³⁹ Government of Canada, Major Projects Office, *Projects referred to the MPO*, [online].

mining project in the Northwest Territories, supported by both the Government of Canada (CAD 5.6 million) and the US Department of War (USD 6.4 million).

Most recently, the highest-ranking officer in the Royal Canadian Air Force stated in an interview with *Le Devoir* that the United States “does not pose a military threat to the country.”⁴⁰

Without resulting in joint investments of this kind in mining projects, the situation is relatively similar with regard to the relationship between the Government of Canada and China following the recent rapprochement between the two countries.

Transparency and consistency required

The notion that foreign states pose an imminent threat or are actively seeking to take control of Canada’s mineral resources is difficult to reconcile with the largely laissez-faire approach that currently characterizes relations with them, both within the business community and at the diplomatic and commercial levels.

Under the circumstances, it is difficult for an independent, non-governmental organisation such as ours to publicly assert which states should be considered “trusted” allies for “secure partnerships,” or to assess the “consequences” of foreign state investment in Canada’s so-called critical minerals, to use the terms of the Standing Committee’s study mandate.

Recommendation #2: The Government of Canada — and provincial and territorial governments — should adopt a more transparent approach and clearly communicate to the public whether it intends to tolerate, accept or refuse foreign state access to and control over Canada’s critical minerals within global supply chains. These positions should then be reflected in policy by limiting cooperation with, and restricting access for, foreign entities that are hostile to Canada’s security.

3. NATO orders increase the impact of the mining boom tenfold

The most concerning aspect of the link between national defence, national security and critical minerals is that increased mining production for military purposes will result in further harm to the environment and the rights of Indigenous peoples and local communities. In our view, it is unrealistic to expect mining impacts to decrease in a context of mining industry expansion.

Mining boom

All signs indicate that Canada has been experiencing a mining boom since the turn of the decade. Since the onset of the Covid-19 pandemic, the mining industry has been buoyed by markets seeking refuge in securities linked to the metals and minerals sector. In Quebec alone, the number of mining titles held by mining companies increased by 149% in six years between September 2019 (143,255) and October 2024 (356,345).⁴¹ While the most recent data dated 13 January 2026 (298,943)⁴² shows a slight slowdown in this upward trend, the mining industry still occupies more than twice the space it did before the Covid-

⁴⁰ *Le Devoir*, *L’Aviation royale canadienne ne veut pas d’une flotte mixte d’avions de chasse*, Mathieu Carbasse, 5 March 2026, [[online](#)].

⁴¹ Data sourced from: Gouvernement du Québec, Ministère des Ressources naturelles et des Forêts, GESTIM, [[online](#)].

⁴² *Ibid.*

19 pandemic. According to the Quebec government, nearly half of the mining titles in the province are for the exploration of critical and strategic minerals.

Government subsidy programmes linked to critical mineral strategies have also contributed to a sharp increase in mining exploration claims. Combined with the relative ease and speed of obtaining an exclusive mining exploration right, or mining claim, these policies have fuelled a boom in mining speculation.

In short, the mining boom began well before the debate as to whether Canada should increase its military spending. Expanding mining to supply the military industry will only intensify pressures on the environment, water and air, as well as the rights of Indigenous peoples and local populations, both in Canada and in other countries where Canadian mining companies operate.⁴³

Canada also remains a major importer of so-called critical minerals. Any environmental, human rights or Indigenous rights standards applied to mining operations in Canada should therefore also apply to mining activities abroad linked to Canada's supply chains.⁴⁴

Economic opportunity, but for whom?

In June 2025, the Government of Canada announced its intention to significantly increase its military spending in order to meet the 5% of GDP target set for its members by the North Atlantic Treaty Organisation (NATO) by 2035.⁴⁵ According to the Office of the Parliamentary Budget Officer, meeting this target would require \$159 billion in core defence spending, representing an increase of approximately \$33.5 billion per year in additional expenditures.⁴⁶

The Government of Canada has already indicated that spending on critical minerals will contribute to meeting its NATO commitments.⁴⁷ This spending appears to have already begun. The Government of Canada has entered into a supply agreement with the mining company Nouveau Monde Graphite to purchase nearly 25% of the production from the Matawinie mining project.⁴⁸ However, roughly half of this concentrate would be used to supply other NATO members.⁴⁹ It is expected that other agreements of this kind will be concluded in the near future.

The idea that so-called critical minerals can contribute to both national defence and the Canadian economy is firmly embedded in the first budget tabled in November 2025 by Prime Minister Mark Carney.⁵⁰

⁴³ Daniel M. Franks, Natalie Gardner *et al.*, *How the rush for critical minerals is neglecting human needs*, *Nature*, 4 November 2025, [online].

⁴⁴ Global Witness, The ITSCI laundromat How a due diligence scheme appears to launder conflict minerals, 30 May 2022, [online]; Terrestres, *Un néo-colonialisme technologique : comment l'Europe encourage la prédation minière au Congo*, Celia Izoard, 5 July 2025, [online].

⁴⁵ Parliamentary Budget Office, *Meeting NATO's 5% target would require \$159 billion in core defence spending by 2035*, *says PBO*, 6 February 2026, [online].

⁴⁶ *Ibid.*

⁴⁷ The National Post, *Canada will pay for NATO spending hike partly by developing critical minerals: Carney*, Catherine Morrison, 24 June 2025, [online].

⁴⁸ Journal de Montréal, *Les Américains avides des minéraux du Québec*, *op. cit.*

⁴⁹ *Ibid.*

⁵⁰ Government of Canada, *Budget 2025: Canada Strong*, November 2025, [online].

Similar positions have been echoed by provincial premiers. In this context, Canadian governments are increasingly presenting military spending as an economic opportunity rather than as a potential constraint on public services and infrastructure funding.

From this perspective, increased extraction of so-called critical minerals, expanded defence spending, and economic growth are seen as mutually reinforcing. As proof of this, in its “response to the new global context,” the Quebec government identifies “security and defence, and critical and strategic minerals (CSMs)” as its “two major strategic opportunities [...] to serve as a driving force for the economy as a whole.”⁵¹

But such a rosy vision is far from being universally shared. Shortly after the federal budget was tabled, the Coalition Québec meilleure mine, which represents more than 250,000 people through its 45 member organisations – including MiningWatch Canada – adopted a declaration rejecting “the militarisation of the economy.”⁵² In the same vein, some 20 civil society organisations co-signed an open letter in *Le Devoir* on February 27th entitled “Military escalation, a threat to our security.”⁵³ The signatories point out that “recent history shows that the arms race exacerbates international tensions, fuels conflicts and diverts resources that are essential to preventing the real crises of our time,” a view we share.⁵⁴

To date, while federal and provincial governments have rapidly endorsed drastic increases in military spending, they have not demonstrated how these measures will improve the wellbeing of Canadians strengthen public institutions. What is already clear, however, is that the mining and military industries stand to be among the primary beneficiaries of this policy direction.

Climate bomb

Even before the recent proposals to massively increase NATO members’ military budgets, global military activities were estimated to account for 5.5% of global greenhouse gas emissions in 2022.⁵⁵ Given the significant planned increases in military spending to reach 2035 targets, it is reasonable to expect a significant increase in NATO members’ greenhouse gas emissions within that same timeframe. In our view, to claim that these additional expenditures will be made entirely through the use of renewable energies is highly unrealistic.

As such, increased military emissions will further intensify the climate crisis, raising the economic and social costs associated with natural disasters and directly undermining national security. As climate change worsens, it is the most vulnerable communities that suffer the most severe consequences. The Government of Canada should therefore recognize that increased spending on so-called critical minerals – especially for increased military production – will heighten Canadians exposure and vulnerability to climate related risks and their associated costs.

⁵¹ Gouvernement du Québec, *Le pouvoir québécois : réponse au nouveau contexte mondial*, op. cit., p. 43.

⁵² Coalition Québec meilleure mine, *Declaration of the Coalition Québec meilleure mine*, 18 November 2026, Lac-Delage, [\[online\]](#), Appendix 1 to this brief.

⁵³ *Le Devoir*, *L’escalade militaire, une menace pour notre sécurité*, Michèle Asselin, Sarah Charland-Faucher et al., 27 February 2026, [\[online\]](#).

⁵⁴ *Ibid.*

⁵⁵ The Guardian, *Nato’s 2023 military spending produced about 233m metric tonnes of CO2 – report*, Dharna Noor, 9 July 2024, [\[online\]](#).

Recommendation #3: The Government of Canada must demonstrate how and ensure that its defence policies and action plans will reduce greenhouse gas emissions and limit the environmental impacts associated with the extraction and use of critical minerals.

4. Diversion of the energy transition supply chain for military purposes

Overall, we view with concern the announcements made by the Government of Canada and the provinces regarding critical minerals and national defence. These policies risk diverting the funds, resources and political attention needed for the energy transition.⁵⁶

A significant segment of civil society has condemned this shift, which has never been the subject of broad public debate. In its November 2025 Declaration, the Coalition Québec meilleure mine calls for “a national conversation on the diversion of the energy transition for military purposes.” Most recently, on 2 March, fifteen organisations signed an open letter in La Presse entitled “The diversion of the energy transition must stop.”⁵⁷

Local opposition has also emerged in communities directly affected by mining projects associated with defence and national security. In August 2025, five municipalities in the Petite-Nation region of the Outaouais voted in a referendum recognised by Élections Québec, with 95% of voters opposed to the La Loutre open-pit graphite mine project after learning that the United States Department of War had provided Lomiko Metals with several million dollars in funding.⁵⁸ The Anishnabe community of Kitigan Zibi, on whose ancestral territory the project is located, also expressed its opposition to La Loutre.⁵⁹

Diverting minerals for the national military reserve

From a strictly material standpoint, stockpiling and allocating so-called critical minerals for military purposes diverts resources from the energy transition. These minerals may ultimately never be used if Canada does not deploy the weapons and defence systems for which they were intended – which is of course the desirable course of events. The net result of the equation is that these resources will no longer be available for urgent applications in renewable energy technologies.

Weapons, drones, vehicles, tanks, submarines, ammunition and other equipment used by the modern military industry require an astronomical amount of materials and minerals.⁶⁰ At the same time, it is already unclear whether Canada has sufficient time and minerals to undertake its energy transition in line with its stated climate targets. In a study published in June 2025, the Canadian Climate Institute, estimated that at least thirty (30) additional mines could be required in the coming decades to supply the minerals needed for the climate transition.⁶¹ While we do not endorse the study’s methodology or

⁵⁶ Catherine Coumans, “Conflict Minerals, Conflict Mines and Critical Minerals for War: Mining, Human Rights and Canadian Foreign Policy” in Van Houten, K., & Neve, A. (Eds.). (2024). *Hand in Hand? Canada at the Human Rights and Peacebuilding Nexus*. Palgrave Macmillan, [online].

⁵⁷ La Presse, *Le détournement de la transition énergétique doit cesser*, Jean-Pierre Finet et al., 2 March 2026, [online].

⁵⁸ The Guardian, *‘Our minerals could be used to annex us’: why Canada doesn’t want US mining*, Sara Hashemi, 5 January 2026, [online]; CBC, *Quebec residents against graphite mine fear powering Pentagon, environmental ruin*, Joe Bonjorno, 9 June 2024, [online].

⁵⁹ Debates Indigenas, *The Clean Energy Smokescreen: Quebec’s Fossil Fuel Ban and the Mining Boom on Indigenous Lands*, Brytnee Laurette and Earthworks, 1 November 2025, [online].

⁶⁰ Elements, *Visualising how rare earths power US defence*, Bruno Venditti, 20 July 2025, [online].

⁶¹ Climate Institute of Canada, *Critical Trajectory: Securing Canada’s Place in the International Race for Critical Minerals*, June 2025, p. 115, [online].

conclusions – particularly because it does not adequately consider policies aimed at reducing mineral consumption – the data research nevertheless illustrates the immense scale of mineral demand associated with the energy transition. This demand is driven by the objective of achieving the targets of the Paris Climate Agreement, which seeks to limit global warming and ensure a sustainable future for future generations.

This raises many crucial questions.

- If mining resources were to be largely diverted from the energy transition to military reserves, how many additional mines would need to be added to the Canadian landscape and around the world to support this demand for minerals?
- Does the government intend to divert mineral reserves intended for the transition to military purposes?
- Or does it intend to authorise even more mines during the same period to meet its military targets?
- How much will the total cost be?
- Is this realistic from a technical, labour and infrastructure standpoint, and in terms of the time required to develop a mining project, which is estimated to take between 10 and 20 years from the initial mining exploration campaigns to production?

These questions, which the Government of Canada cannot ignore, raise legitimate doubts about the country’s real ability to “improve its national capacity,” to quote the terms of the mandate of this Study by the Standing Committee on National Defence.

In our view, the only realistic way to meet mineral needs across all sectors is to aim for mineral sobriety, meaning a deliberate reduction of Canada’s overall consumption of these finite resources. The minerals designated as “critical” by the Government of Canada are not unlimited in Canada’s subsoil. The consequences of their exploitation are likely to cause more problems for Canada than those the government is seeking to solve with its energy transition and national defence plans.

This dilemma is not unique to Canada. The United States is also grappling with the same issue of military diversion of mineral reserves intended for energy transition.⁶² This partly explains their appetite for so-called critical minerals found in Canada.

Where is the money for national security in the face of the climate crisis?

Canada’s financial resources are not unlimited. Year after year, the Government of Canada and many provincial governments present deficit budgets that nevertheless include reduced investments or struggle to keep up with indexation for many social services that are vital to the population. In this context, we dare to state clearly and without exaggeration that diverting funds intended for health care, housing, environmental remediation, and even climate change adaptation to military purposes will kill Canadians. True national security lies in a healthy population, a healthy society with resilient physical and social infrastructure, capable of coping with climate and natural emergencies – which are already occurring and increasing in frequency – as well as military threats – which may or may not materialise.

The climate emergency is a real and present danger, not just a vague geopolitical threat. We cannot negotiate peace with a warming climate.

⁶² Transition Security Project, *Mining for War: Assessing the Pentagon’s Mineral Stockpile*, 4 December 2025, [[online](#)].

The Government of Canada must address the impacts of climate change that are already visible at home. In the mining sector, this translated to more frequent and devastating floods and forest fires. The changing climate increases the risk and likelihood of tailings dam failures when atmospheric rivers exceed their processing capacity, as well as the loss of electrical power at mining sites in the event of a fire affecting its infrastructure and leading to the shutdown of its pumping or underground ventilation functions. These events endanger the lives of workers and people living near mining sites. We cannot negotiate or prevent these possibilities, we can only prepare for them – and that requires investing in climate mitigation and adaptation.

Mineral sobriety is the solution

To ensure genuine national security, and in light of the technical and time constraints and dangers associated with the rapidly opening new deposits of so-called critical minerals, the Government of Canada and the provincial governments should focus their efforts on achieving mineral sobriety across all sectors, including national defence. This means reducing overall mineral consumption through deliberate policy decisions that prioritize more efficient, low carbon technologies, as well as reuse rather than relying on ever greater extraction.

On 28 January, a study by researchers Pénélope Bieuville, Guillaume Majeau-Bettez and Anne de Bortoli published in the prestigious journal *Nature Sustainability* highlighted that “the energy transition scenarios of the Intergovernmental Panel on Climate Change neglect [the] risks [related to the issue of critical metal availability].”⁶³ According to the researchers, “an optimised technology mix reduces the list of metals limited by mining capacity from 13 to just copper, lithium and vanadium.”⁶⁴ In their view, the following solutions should be implemented: “replacing silver and gallium in solar technologies, prioritising gearbox wind turbines and electric vehicles with induction motors without permanent magnets, and replacing some of the copper in the grid with aluminium.”⁶⁵ Their observations take a much broader critical view than just the energy transition sector. Their study points out that “sixteen other metals remain under pressure, but as more than 90% of their demand comes from sectors outside the energy transition, our results highlight the need for metals sobriety across the economy.”⁶⁶

Recommendation #4: The Government of Canada should focus investments, resources, and efforts on achieving mineral sobriety in all areas, including the national defense sector.

Recommendation #5: The reuse and recycling of so-called critical minerals should be prioritised in government investments, provided that these measures do not endanger public health and the environment.⁶⁷

⁶³ Bieuville, P., Majeau-Bettez, G. & de Bortoli, A. *Technology flexibility and sobriety to address shortage of energy-transition metals*. *Nat Sustain* (2026), [online].

⁶⁴ *Ibid.*

⁶⁵ *Ibid.*

⁶⁶ *Ibid.*

⁶⁷ Forbes, *Recycling Rare Earth Minerals Can Address Military Demand*, Saleem H. Ali, 12 October 2025, [online].

5. Canada’s minerals must not be used as weapons of aggression or genocide.

The title of this section says it all. Under no circumstances can we support the idea that so-called critical minerals extracted from the subsoil of Canada’s provinces and territories be used as ammunition to attack other states or, worse, to facilitate genocide or other crimes against humanity. This position applies equally to military operations carried out by Canada, its allies, or any other state or entity supplied with Canadian minerals. This recommendation echoes the call to action by people in the Sudbury region of Ontario who, in July 2024, asked the Government of Canada not to sell Canadian nickel to Israel. A petition to this effect was tabled in the House of Commons by then-New Democratic Party MP Charlie Angus of Timmins—James Bay.⁶⁸

Recommendation #6: The Government of Canada should make firm commitments and establish a transparent and credible traceability system for its critical minerals to assure the public that they are not used in the creation or proliferation of weapons used in violation of international law, including in genocides, whether these weapons are used by Canada or a third country

6. Do not accelerate mining projects that are hostile to Canada

The House of Commons Standing Committee’s study on the links between national defence, national security and Canada’s critical minerals sector is taking place in a context where the federal government and several provincial governments have introduced and passed bills aimed at “accelerating” mining projects.

At the federal level, Mark Carney’s Liberal government introduced Bill C-5, including the *Building Canada Act*, on June 6 2025,⁶⁹ which was hastily passed into law twenty days later.⁷⁰ This bill introduces the concept of “projects of national interest”,⁷¹ for which:

[P]arliament recognizes that it is urgent, in the interests of Canada’s economy and sovereignty and its security, including its energy security, to advance projects across Canada, including in the North.⁷²

The effect of the *Building Canada Act* will therefore be to seek to accelerate the start of mining projects across the country. At the time of writing, five mining projects have been identified as “of national significance” and are listed by the Canada Major Projects Office.⁷³ The specific measures for accelerate these mining projects need to be specified on a case-by-case basis, but the text of the *Building Canada Act* seeks to circumvent certain environmental measures enshrined in laws and regulations of crucial importance to the mining sector, including the *Fisheries Act*, the *Canadian Environmental Protection Act, 1999* (CEPA), the *Species at Risk Act*, the *Impact Assessment Act* and the Metal and Diamond Mine Effluent Regulations under CEPA.

⁶⁸ The Sudbury Star, *Pro-Palestinian group in Sudbury wants Canada to ban nickel sales to Israel*, 21 July 2024, [online]; see also the Arms Embargo Now campaign, [online].

⁶⁹ *An Act to enact the Free Trade and Labour Mobility in Canada Act and the Building Canada Act*, Bill C-5 (1st reading in the House – 6 June 2025), 1st session, 45th Parliament (Can.).

⁷⁰ *Building Canada Act*, S.C. 2025, c. 2.

⁷¹ *Ibid.*, s. 2, para. 5.

⁷² *Ibid.*, preamble.

⁷³ Government of Canada, *Major Projects Office*, *op. cit.*

Recommendation #7: No Canadian legislation at any level of government should allow for the fast-tracking of permits to companies that are supported by any foreign entity hostile to Canada’s national security.

An approach imitated by the provinces

At the provincial level, several bills have also been introduced and passed to accelerate mining projects, with serious implications for environmental oversight and regulatory protections. In Quebec, the government has introduced several bills in the last year aimed at “accelerating mining projects.” Among these is Bill 81,⁷⁴ which received royal assent on 28 May 2025, which allows for the start construction on certain mining projects without completing the required environmental assessments and public consultations. Most recently, Bill 5 of the current legislative session⁷⁵ seeks to introduce several fast-tracking measures.⁷⁶ The National Assembly of Quebec is also currently considering Bill 11, An Act to amend various provisions, mainly for the purpose of reducing the regulatory and administrative burden, which includes several provisions targeting the mining sector that we find problematic.⁷⁷

In Ontario, the Conservative government successfully passed Bill 5, the *Protect Ontario by Unleashing our Economy Act* in less than two months.⁷⁸ Among the many measures adopted to accelerate the implementation of mining projects, the most notable was the creation of “special economic zones.” In these designated areas, the government gives itself the power to remove or mitigate the requirements and conditions that a developer must meet in order to obtain the necessary authorisations for their project. This omnibus bill also replaced the *Endangered Species Act* with a proposed *Species Conservation Act*. We have drawn the following analysis from this:

The omnibus bill aims to further degrade Ontario’s already-battered and ineffective environmental protections and public participation in decision-making, and further marginalise Indigenous peoples’ governance over their own territories, removing even the limited and inadequate opportunities for consultation provided for under the Canadian Constitution.

In other words, rather than working to diversify Ontario’s economy and build resilience and sustainability to protect our future well-being in the face of a trade war, not to mention climate chaos, the Ford government is moving to degrade both the environment and the democratic process. And rather than working towards reconciliation with First Nations and implementing commitments made under the United Nations Declaration on the Rights of Indigenous Peoples, the Ford government is moving to bulldoze Indigenous rights to free, prior and informed consent, and even literally bulldoze their territories. He has, after all, promised to climb onto a bulldozer himself to develop roads and mines in the Ring of Fire.⁷⁹

⁷⁴ *Loi modifiant diverses dispositions en matière d’environnement*, Bill No. 81 (assent – 28 May 2025), 1st session, 43rd legislature.

⁷⁵ *Loi visant à accélérer l’octroi des autorisations requises pour la réalisation des projets prioritaires et d’envergure nationale*, Bill No. 5, (introduction), 2nd session, 43rd legislature.

⁷⁶ Eau Secours, Coalition Québec meilleure mine and Sept-Îles sans uranium, *Mémoire: Projet de loi 5 visant à accélérer l’octroi des autorisations requises pour la réalisation des projets prioritaires et d’envergure nationale*, 9 February 2026, [\[online\]](#).

⁷⁷ MiningWatch Canada, Coalition Québec meilleure mine and Eau Secours, *Mémoire: Projet de Loi 11 modifiant diverses dispositions principalement aux fins d’allègement du fardeau réglementaire et administratif*, 2 February 2026, [\[online\]](#).

⁷⁸ *Protect Ontario by Unleashing its Economy Act*, Bill No. 5 (royal assent – 5 June 2025), 1st sess., 44th leg. (Ont.). 2025

⁷⁹ MiningWatch Canada, *Sacrifice Zones – The Ford Government’s Latest Plan To Stimulate the Economy*, Jamie Kneen, 16 May 2025, [\[online\]](#)

In British Columbia, Infrastructure Projects Bill 15 received royal assent on 29 May 2025, granting the minister responsible for its implementation the power to waive environmental standards for “designated projects”.⁸⁰ While it is entirely understandable that moderate-scale hospital and school projects would be targeted by this fast-track procedure aimed at stimulating job creation in the construction sector in particular, we fully agree with Ecojustice’s analysis that “this quietly paves the way for the government to impose large industrial projects such as mines [...] without adequate environmental assessment or public consultation.”⁸¹

In Nova Scotia, the government also rushed its plans last spring, acting in quick succession to repeal the decades-old ban on all uranium exploration and mining projects, adding this radioactive and harmful mineral to the province’s list of critical minerals, and calling on mining companies to submit uranium exploration projects in three designated counties.⁸² Despite all these efforts to court the industry, no company has submitted a project, clearly illustrating that legal measures aimed at accelerating mining projects are not the only factor explaining the lack of progress.⁸³

While it is undeniable that the Government of Canada and provincial governments are engaged in a race to approve more mining projects, authorities must not accelerate approvals in ways that compromise national security by allowing hostile foreign entities to use Canada’s critical minerals against our interests. This race to the bottom in terms of fast-tracking and lowering regulatory standards in the mining sector must not be allowed to create dangerous situations for national defence.

7. Rushed mining projects are dangerous

There is every reason to fear that political pressure to speed up the issuance of permits to mining companies, combined with increased demand for minerals for national defence and energy transition, will open the door to the authorisation of bad mining projects.

This situation of overgrowth artificially inflates demand and encourages the implementation of more marginal and risky mining projects to meet demand. This also applies to so-called critical minerals not related to energy transition, such as tungsten. For example, the Sisson tungsten mining project in New Brunswick received funding from the US Department of War and was then added to Canada’s Major Projects Bureau list, despite the fact that this mineral has very little use in the energy transition and that the project raises serious and multiple environmental issues.

This context of political eagerness therefore raises doubts about Canada’s ability to support its industrial infrastructure, whether in defence, energy transition or any other competitive field. Bad mining projects will undermine Canada’s potential in critical minerals and squander public finances rather than strengthen supply chains.

Instead of trying to push the machine beyond its capabilities and with no hope of opening “enough” mines in too little time, the Government of Canada and provincial governments would be better off aiming for mineral sobriety in all sectors, including national defence.

⁸⁰ *Infrastructure Projects Act*, Bill 15, (royal assent – 29 May 2025), 1st sess., 43rd Leg. (B.C.).

⁸¹ Ecojustice, *Bill 15 is a threat to democracy and the environment – here’s what you need to know*, Sarah Korpan and Andhra Azevedo, 15 May 2025, [[online](#)].

⁸² CBC, *There was zero interest in Nova Scotia’s call for uranium exploration*, Taryn Grant, 12 June 2025, [[online](#)].

⁸³ *Ibid.*

No environmental setback is acceptable

Even before the goal of curbing harmful mining projects, the ultimate priority of government efforts to reduce the “regulatory burden” should be to avoid any rollback of environmental regulations and legislation.

While supporting the economy remains an important goal, the vast majority of Canadian society believes that the environment still suffers from a lack of protection mechanisms against the interests of the mining industry. Therefore, introducing mechanisms that would repeal or reduce the effectiveness of existing environmental measures for the sake of administrative efficiency would be poorly received by the public and would send the message that the government is willing to sacrifice the environment in order to maximise the profits of multinational extractive companies, regardless of the motive.

The mining industry frequently propagates the idea that environmental assessments are responsible for the slow delays in the issuance of permits by government authorities. However, in many cases, these delays are economic and financial in nature, and are in fact caused by the inability of mining companies to raise the capital necessary to get their projects off the ground. In other cases, companies are simply overwhelmed by the technical complexity of their own projects, which exceed their knowledge and capabilities. Often, they themselves will extend their initial timelines in order to allow more time to build trust with local communities. Thus, the calculation of delays during the impact review and assessment phase cannot be attributed solely to the environmental procedure itself.

In its work, the Standing Committee on National Defence must also bear in mind that accelerating mining projects can pose serious risks and dangers to the environment, the rights of Indigenous peoples and the safety of workers.

When these risks and threats are underestimated, ignored or dismissed due to political pressure to issue authorisations, mining projects are more likely to have their operations suspended due to workplace or environmental accidents. These forced breaks therefore reduce their productivity and profitability and, inevitably, the benefits to the state and local communities in the form of royalties and other spin-offs.

A recent example of this is Newmont’s Red Chris gold and copper mine in British Columbia, which is listed on the Government of Canada’s Major Projects Office website.⁸⁴ In August 2025, three drillers were trapped 284 metres underground for more than 60 hours after rockfalls forced them to take refuge in a mine rescue chamber designed for this purpose. However, the provincial government had designated the expansion of the Red Chris mine on its list of “critical” mineral projects to be fast-tracked as part of a £20 billion plan to stimulate job creation and counter US tariffs.⁸⁵

⁸⁴ Government of Canada, *Major Projects Office*, *op. cit.*

⁸⁵ BC Mining Law Reform, *How Environmental Assessments help safeguard worker safety in B.C. mining*, 21 August 2025, [\[online\]](#); CBC, *What is the Red Chris mine, and why is B.C. fast-tracking its expansion?*, Akshay Kulkarni, 23 July 2025, [\[online\]](#).

As the British Columbia Mining Law Reform (BCMLR) network points out, “This narrowly averted accident is a stark reminder that environmental assessments are not just about protecting ecosystems. They can also be essential tools for saving lives.”⁸⁶ The BCMLR network goes on to state that:

Environmental assessments are often viewed as an administrative formality, but neglecting or glossing over mining project assessments and safety analyses can lead to inadequate plans, missing infrastructure, or the exploitation of hazardous areas. New policies to accelerate mining projects must not weaken requirements for geotechnical assessment or emergency systems. Without comprehensive environmental assessments, essential elements such as refuge chambers or robotic rescue technologies could be minimised, delayed or simply omitted.⁸⁷

Ultimately, the economic interventions by the state that are likely to make the biggest difference to the development and completion of a mining project lie less in the reduction of any “administrative burden” than in the construction of taxpayer-funded infrastructure to access deposits, such as roads, railways and deep-water ports, and all other subsidies offered to the industry.

Recommendation # 8: Policies to accelerate mining projects must not weaken nor roll back environmental regulations.

No to seabed mining

The Standing Committee on National Defence should also take a clear and firm stance that Canada’s military supply chains should not rely on seabed mining. In the United States, a bill to encourage the evaluation of expanding mineral supply from the seabed was introduced in the House of Representatives nearly two years ago.⁸⁸ Canada must not go down this path.⁸⁹

Recommendation #9: A complete ban on seabed mining activities must be implemented in Canada and internationally, and the national defence sector must not be exempt.

8. Energy security: nuclear power is not a solution

The mandate of the Standing Committee on National Defence requires it to “recognise that national security involves energy security,” but this must be considered alongside the fact that the mining and military industries are also highly energy-intensive. In a context where the Government of Canada and provincial governments are seeking to increase the number of mines in operation, the question arises as to what forms of energy would power these mining sites and all of their related operations.

Regardless of the Canadian national defence programme, we insist that the energies deployed to these ends do not exacerbate Canada’s responsibility for the climate crisis.

⁸⁶ BC Mining Law Reform, *How Environmental Assessments help safeguard worker safety in B.C. mining*, 21 August 2025, [\[online\]](#), (our translation).

⁸⁷ BC Mining Law Reform, *op. cit.*

⁸⁸ The Metals Company, *TMC Commends U.S. House of Representatives for Allocating Defence Funding to Assess the Feasibility of Domestic Nodule Refining Capacity*, 23 May 2024, [\[online\]](#).

⁸⁹ We endorse the arguments put forward by Greenpeace in: Greenpeace USA, *Deep Deception: How the deep sea mining industry is manipulating geopolitics to profit from ocean destruction*, July 2025, [\[online\]](#).

However, we also stress the extreme importance that mining activities should not rely in any way on the use of nuclear energy. Nuclear energy is often promoted by its advocates because of its low greenhouse gas emissions compared to hydrocarbons. Yet, regardless of its uses, we believe that nuclear energy is a bad idea and a false solution, and that it must be completely ruled out from Canada's energy future. Uranium, the main driver of nuclear energy, is the only mineral substance for which our organisation, MiningWatch Canada, has taken a position against all forms of exploitation.

The fact that uranium is on the list of critical minerals in Canada and certain producing provinces such as Saskatchewan and Manitoba does not change this.

We share the view of many experts that it is impossible to separate the nuclear energy sector from the nuclear weapons sector.⁹⁰ We believe that the claim that uranium mining and the use of nuclear energy could contribute to energy security is misleading, and we urge the Standing Committee on National Defence to take a firm stance on this issue.

On the contrary, this path would increase our exposure to risks and threats that undermine our national security.

Recommendation #10: Uranium should not be included in critical mineral lists and the Government of Canada should avoid expanding use and reliance on nuclear energy.

9. Clean water and healthy air are vital to national defence

We call on the Standing Committee on National Defence to recognize that safeguarding clean water and clean air are vital to Canada, its national defence and its national security.

For too long, government plans and strategies have been formulated in such a way as to lead the public to believe that minerals are the only elements of nature that can be considered critical or strategic to the country.

All mining operations, from exploration to exploitation to restoration, have a significant impact on water and air quality, as well as on the amount of clean water available to Canada. This reality must no longer be hidden or obscured in the various promotional campaigns of the mining industry and governments. The Government of Canada and provincial governments must recognize that water and air pollution caused by the mining industry—including in the critical minerals sector—constitute threats to public health and safety.

Damage to water and air contributes to thousands of deaths each year in Canada and is responsible for millions of dollars in healthcare and other related medical costs.

The Government of Canada would also be well advised to remember that access to and control of fresh, clean water will be much more critical issues for the future of humanity than minerals. The possibility that Canada could be the target of threats from foreign states or entities over access to and control of fresh water is just as plausible as that of so-called critical minerals. It should therefore not be dismissed, ignored or overlooked in the Standing Committee on National Defence's review. However, a thorough

⁹⁰ M. V. Ramana, *Nuclear is not the solution: the folly of atomic power in the age of climate change*, Verso Books, 2024; Joshua Frank, *Atomic days: the untold story of the most toxic place in America*, Haymarket Books, 2022.

and rigorous analysis of the issue should recognise that the mining industry's impacts on water are multiple, serious, costly and dangerous.⁹¹

Recommendation #11: The Government of Canada should avoid and minimise any mining activity that could cause serious damage to fresh water and clean air.

10. Ending free entry mining

The discourse of the Canadian and provincial governments surrounding the idea that it is necessary to exploit so-called critical minerals to ensure national defence and national security is based on the belief that these minerals have a role to play in protecting the Canadian nation from a certain form of external violence. In other words, so-called critical minerals are seen as a bulwark against foreign interference or hostile takeover from outside forces. It is therefore vital that we exploit these mineral resources ourselves before a colonial power seizes them and turns them against us.

Yet this is exactly what Canada has been doing since its founding against Indigenous peoples, and what the French and British empires did before that. It is paradoxical, to say the least—not to mention morally unbearable—to see that the Canadian and provincial governments are now seeking to protect their economies, national security and national defence by replicating the power dynamics between the various Crowns and Indigenous peoples that have existed since the European invasion of Turtle Island nearly half a millennium ago.

What will happen if Indigenous peoples refuse to give their free, prior and informed consent to the project to increase the impact on their territories tenfold in the name of the Government of Canada's security? Whose interests are we talking about “defending”? Those of the Government of Canada or those of the many Indigenous peoples who hold ancestral rights to the territories where critical minerals are found across the country?

Are governments committed to ensuring the security and defence of Indigenous peoples if they do not consent to having their territories destroyed in order to establish a constellation of pits containing minerals deemed critical to Canada?

Both domestically and internationally, the Government of Canada, followed by many provincial governments, asserts that Canada and its provinces stand apart from other mining jurisdictions around the world in their ability to produce not only “critical” minerals, but also “responsible” ones.

Needless to say, we do not share this view.

As long as Canada and its provinces and territories do not abolish the free entry mining system that underpins their mining laws, governments will never have legitimacy or credibility on the notion of responsibility surrounding so-called critical minerals.

The solution to this issue is simple. All that is needed is to enshrine the United Nations Declaration on the Rights of Indigenous Peoples in mining laws so that free, prior and informed consent is mandatory before any mining permit is issued. Otherwise, any mining project presented as being “for national

⁹¹ Eau Secours and MiningWatch Canada, *Impacts of Mining Activities on Water: A technical and legislative guide to support collective action*, 21 November 2023, [[online](#)].

defence” will continue to be based on violence against Indigenous peoples. No threat to national security can justify, as a country, continuing to play into this national horror story.

Recommendation #12: The Government of Canada must end the free-entry mining system, and fully implement the UN Declaration of Rights of Indigenous Peoples, especially with regard to Free, Prior and Informed Consent – including the right to say no.

Conclusion

Regardless of the opinions and recommendations issued by the Canadian House of Commons Standing Committee on National Defence regarding the links between national defence, national security and Canada’s critical minerals sector, we must remember that minerals are non-renewable resources that leave lasting mining waste on the land in exchange for insufficient and temporary economic benefits. We believe that we cannot leave it to future generations to make decisions that will determine their future when we have the opportunity to do so now.

We thank you in advance for your attention and diligence in considering our comments and assure you of our full and complete cooperation in providing any additional information you deem relevant to the issues in this matter.

Yours sincerely,



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APPENDIX 1 – Declaration by the Coalition Québec meilleure mine

Lac-Delage, 18 November 2025

The Coalition Québec meilleure mine, which has been defending the environment, the rights of Indigenous peoples and local populations against the impacts of mining on Quebec's territories since 2008, recognises that:

- Québec's mining regime is based on the dispossession of Indigenous peoples and the denial of their ancestral rights;
- The provincial and federal governments are placing the mining and military industries at the heart of their economic vision;
- The transition, digitization, electrification, and militarization of the economy are based on the consumption of minerals;
- The low circularity of the Québec economy is failing to reduce the extraction of new mineral deposits in a context of growing demand for minerals;
- The population of Québec is demanding greater protection of the environment and their health;
- The population of Québec wishes to increase and redistribute mining royalties without sacrificing the resources of future generations.

The Québec meilleure mine Coalition therefore declares that:

- Mining laws must respect the rights of Indigenous peoples and local communities, and ensure the effective protection of the environment and public health;
- The government's agenda of militarizing the economy must be rejected;
- A national conversation about the diversion of materials needed for the energy transition for military purposes must take place;
- Fresh water, clean air, and biodiversity are critical and of national interest;
- The fight against mineral overconsumption must become a national priority;
- Mining must focus on meeting the real needs of humanity;
- The import and export of necessary minerals cannot be done at the expense of human dignity;
- Mining activities must not exacerbate the climate crisis and the collapse of biodiversity;
- The diversification of regional economies must be prioritized over the primary exploitation of resources;
- The local transformation of necessary minerals must be encouraged;
- The precedence of mining activities over other uses of the territory and the self-regulation of the mining industry must be abolished;
- Indigenous peoples and local populations must obtain justice.

Accordingly, we will continue our actions until our governments regulate the mining sector in this manner.