August 5, 2025

To MNR Leaders and Leadership,

This letter is to detail why the MNR must seriously question, validate and understand the applicant's proposal. This letter also asks the that MNR NOT proceed in any manner and reject the application of the 2004295 Ontario to change the terms of the existing approve quarry remediation plan.

2004295 Ontario Inc. seeks to authorize the importation of excess soil for a maximum of 11,395,324 cubic meters to re-establish pre-existing grades and to revise the final use of the site from pond to agriculture.

This application is a precedent setting "major charge request" and raises multiple concerns across five areas:

1. Due Process and Governance:

The application is a change request to an originally extensively studied, governed, revised, negotiated and agreed to plan. There has been little public engagement awareness of this change request and the applicant has strategically filled the application in July to avoid public ability to have schools, Universities, community groups and the public engage with people, and key staff are on holidays. The applicant is using a numbered company to hide their corporate identity of a large aggregate company. The lack of transparency and the manner in which the company acts is an injustice in itself.

This is a significant change from the agreed to naturalization plan with significant environmental, traffic, carbon and land use and groundwater water contamination considerations.

The motive of the applicant must be questioned. Why do they now wish the land to be returned to agricultural use? Why was that not considered in their original application? One has to question if this not just a ploy to refill a pit to reuse for other commercial gains, increased ROI and or land developments after extracting all natural resource value from the land.

2 Fill and Ground Water Risk.

Who will oversee the quality of fill being used? Good fill is in high demand organizations pay for good fill. The applicant can and will make all decision based on profit. They will not pay for good fill! They will be paid to accept bad fill soil contaminated by construction waste, with cement containing such chemicals as Chromium, Aluminium Oxide, and Asphalt containing Polycyclic Aromatic Hydrocarbons that are known or suspected carcinogens. Lead, Candiaum or Arsenic or construction waste such as soil contaminated with asbestos, oils and septic beds and clay as some examples. The subject area will become a cheap landfill site for "problem" fill that should be property recycled or shipped to land file sites that have solid none preamble rock and solid structure. NOT placed in an area that has soft aggregate rock and soils and an abundance of ground water and major rivers like the credit River that will easily be contaminated by water leaching through fill contaminated by bad fill.

This area is surrounded by homes that rely on clean ground water for rural wells and drinking water and farm operations. Who is going to be responsible when wells are contaminated by bad fill of this operation? Will the MNR accept this responsibility? How can the MNR oversea or govern a fill operation

of this magnitude in a sensitive ecosystem or permeable soils with an abundance of ground water and surrounding rivers?

3) The Bigger Picture:

(Please see picture below) The MNR need to be aware of the bigger picture. Within 5 KM of this application there are two other major quarry "actions" in Progress St Marry Cement (CBM) is proposing a Mega blasting query in this area along Charleston Road and another land owner of a surrendered quarry licences is asking to infill another lake now referred to as Swan Lake which is a now a major municipal issue.

The bigger picture needs to be considered. A pit when quarry operation stop cannot become fill sites as each of these have extensive interconnected underground water system that are now or will be exposed. For the applicant to realize profit or further ROI from the land when these have depleted all the natural resources, they can consider the following: Sell a Land Trust or local Conservation authorizes, donate the land to the Municipality for TAX Credits or sell the land to developers that can responsibly build homes within the remaining foot print, amongst the ponds and lakes created without further risk or destruction to the surrounding community. The community had already endured years of dust; pollution traffic and negative impacts of the applicants quarry operations. Current By laws of the Town of Caledon Do NOT Permit this type of infill Operations.

3) **Traffic and Carbon Cost for the sake of Applicant Revenue ROI:**

The Numbers

Fill Required CUBIC Meters	Duel Axil Dump Truck Capacity CUBIC Meters	Loads Required	Loads Per Day	Days to Fill	Years to Fill based on Truck Loads Per Day	Revenue Per Load of "Fill"	Total Revenue	Diesal CO2 LBS Emmsion factor Per Gallon (EPA)	Gallons of Desel Used Per Day / Truck	Loads Per Truck 8 HRS/ Day 2 Hours Per Load	Daily Fleet Number of Trucks	C02 LB Generated
11,395,324	16	712,208	150	4,748	13.01	$ 150.00	$ 106,831,162.50	22.40	50	4	37.5	199,418,170

The numbers speak for themselves!

Why would he MNR agree to the destruction of a naturally occurring groundwater pond/ lake? Why would the MNR not be satisfied with the current plan? What is the benefit of the proposed revised plan? Is a naturalized pond / lake and surrounding area not a better benefits to the environment and surrounding area than the risk and pollution of a non governed infill operation and the carbon footprint print it creates?

5) **How Could this proceed**:

If this were to proceed, the MNR must establish the governance system and the policies and practices to study and assess and understand ground water risk, fill quality assurance protocols complete with a comprehensive 3rd party testing and rejection requirements, carbon benefit vs carbon contribution, and complete a traffic study such a fill operation would create. The applicant needs to pay for all this work to be done by the MNR or independent party with peer reviews to properly assess the benefit of the proposed plan vs the current plan (Naturalize) This is no different than governance on which the applicant quarry licence was originally granted.

However, the risk of filling a quarry with unnatural duty construction bad fill is much greater than the risk of removing pure natural clean Fill in the form naturally occurring aggregates in contaminating the groundwaters and surrounding rivers. Who is going to be responsible for that risk?

I urge the MNR Leaders and Leadership to fully reject this application based on the application itself and the much larger precedent this would set for this entire area. This is necessary to prevent every quarry that has soft aggregate soil structure in surrounding groundwaters with rives from doing the same so as not to create construction fill toxic pits contaminating the ground and drinking water wells rural areas depend on.