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RE: Comments on Aggregate Resources Act Updates

The intent of this correspondence is to provide comments on the proposed updates and modernization of operational policies supporting the delivery of the provincial Aggregate Resources Act program. Our comments are as follows:

- **Recognize improved efforts to prevent negative impact on surface water and groundwater through the Water Table report.** The prominent area for aggregate development in our geographic area is the headwaters of the Township of Mulmur's main rivers, the Pine River and Boyne River, and their corresponding creeks. Any surface run-off from the aggregate sites has the potential to increase the temperature of these water bodies negatively impacting cold water fish habitat. The Nottawasaga Conservation Authority (NVCA) does monitor temperature at 14 monitoring locations throughout Mulmur. The Maximum Predicted Water Table report will help determine water table levels within aggregate sites.
- **Request that ground water monitoring be increased to a minimum of two years from one year to determine the Maximum Predicted Water Table.** Increasing the time will increase the data available and lead to better decision making.

- **Request that water table reporting be required for both above and below water extraction.** The reporting must describe the potential impacts of the proposed aggregate operation on ground and surface water resources, and the uses they support – washing vehicles, chemical spill clean-up, , etc. (including temporary storage, staging, and work areas.
- **Elevate the concerns of a municipality under the Matters to Considered in the Issuance of a License.** Although there is reference to consulting with municipalities where the aggregate operation is to be located, the weight of the municipality's comments are limited. The comments will be carefully considered but the proponent is not mandated to address them. Strengthening the wording to acknowledge that a municipality's concerns will be strongly considered would be beneficial.
- **With the dilution of environmental protection measures previously found in in other environmental legislation there is a spillover effect into the changes proposed to the Aggregate Resources Act.** For example, the Ontario government has made sweeping changes to how wetlands are evaluated and protected which weakened criteria for protecting wetlands. Analysis of the environmental consequences of the policy proposals within the Aggregate Resources Act are anticipated to be neutral but there wasn't any justification as to why the evaluation was neutral.
- **Consider forcing aggregate sites that are expanding to undertake the same license requirements as a new applicant.** The proposed update to expanding a licensed area without having to file a new license will make it easier for the proponent but without adequate assessment it may present risks to the environment, public health and safety.
- **Place greater emphasis on monitoring air quality emissions in nearby communities.** For blasting quarries, it would be helpful to monitor air emissions as blasting contributes to local air quality in rural communities.

We welcome an opportunity to discuss these comments at your earliest convenience.

Sincerely,



Chris Wolnik  
Director of Infrastructure

cc. Cheryl Russel