

ERO 025-0216

Updating and modernization of operational policies supporting the delivery of the provincial Aggregate Resources Act program

The policy updates and streamlining in this proposal are a good start in modernizing the aggregate industry, and in particular, the licensing process. However, it only begins to scratch the surface of the changes needed to bring this industry into the 21st century. Awareness of issues around land use and climate change have outpaced the industry's understanding of community values and priorities, and these must be taken into account.

Please take into account the following comments:

- understand that, when licensing aggregate activity, the identification of “provincially significant wetlands” does not address the unevaluated wetlands in vast swaths of the remote East and North of the province that were not identified in previous decades by the Conservation Authorities on account of time and resources available, and under the current CA mandate, will not be evaluated, AND FURTHER understand that unevaluated is not synonymous with unimportant (i.e. lacking in significance); therefore, take into account ALL WETLANDS in both hydrogeological/water study, and cultural heritage study, based on not only the size of wetlands, but based on their eco-systems, species at risk, and connectivity within watersheds and sub-watersheds, and their value within the landscape
- understand that the areas given special consideration as environmentally sensitive lands and protected farmland, i.e. the Greenbelt and the

Escarpment, were protected decades ago under different government priorities, BUT that there are other areas of the province that should now be studied and designated in the present day before aggregate exploitation is permitted, in particular the complex network of producing maple sugar forests that characterize much of Eastern Ontario, within networks of lakes, rivers and wetlands, all deserving of protection and preservation for the future; these areas should be given extra scrutiny when aggregate extraction is proposed,

- FURTHER, understand that “cultural heritage landscape” and “specialty crop areas” need to incorporate the maple sugar bush industry that characterizes much of Eastern Ontario.
- take into account economic and values of natural heritage features, many of these identified in County Natural Heritage Systems; consider also the need to preserve natural heritage features for tourism and human health and well being, and consider incorporating these in tandem with “cultural heritage landscape”
- understand the significance of the cumulative impact of a concentration of pits in an area, and take responsibility for implementing a wholistic assessment as part of pit approvals; understand that cumulative impact has NOT been adequately taken into account: *“To minimize the cumulative impacts of aggregate pits and quarries on the environment and nearby communities, we recommend that the Ministry of Natural Resources and Forestry develop a framework to incorporate consideration of cumulative impacts of aggregate operations when making decisions on new or amended approvals”* (Auditor General’s Report Management of Aggregate Resources. 2023. p 39)

- FURTHER, expand the Water Study 2.3 , to take into account not only the “aquifer characterization” but ALSO in the “zone of influence”, the cumulative impact of adjacent and/or nearby pits, where below water table extraction will intrude into the same aquifer; ensure that 3D Numerical Groundwater Flow Modelling becomes the required standard for the Water Report

- require predictive air quality study where extraction may disturb known elements hazardous to human health, particularly Naturally Occurring Radioactive Material (NORM) and apply the Canadian Standards, as already used by the Ontario Ministry of Labour; leaving air quality as a concern to be evaluated only AFTER pit approval demonstrates reckless disregard for human health and well being, where the interaction of PM2.5 and PM10, already demonstrated hazards in their own right, can combine with more hazardous (toxic or radioactive substances). There is no jurisdiction providing oversight to this potential risk, and the awarding of a licence to extract must acknowledge and evaluate these potential harms.