



September 25, 2025

Sheena Tower  
Ministry of Natural Resources: Development and Hazard Policy Branch  
300 Water Street  
Peterborough, ON  
K9J 8M5

**Re: ERO #025-0216, Updating and modernization of operational policies supporting the delivery of the provincial Aggregate Resources Act program**

Ontario Nature is writing to express concern over some of the proposed changes to operational policies under the *Aggregate Resources Act* (ARA).

Since 1931, Ontario Nature has protected wild species and wild spaces through conservation, education and public engagement. We represent 9,500 members, 130,000 supporters and 150 member groups across Ontario.

While Ontario Nature supports certain aspects of this proposal, such as the policy changes requiring the Ministry of Natural Resources (MNR) to only issue a licence if an aggregate operation will have no negative impacts on groundwater and surface water resources, there are some aspects of the proposal, which will have negative effects on the environment and public transparency. Furthermore, the language used in several changes is vague and conditional, creating unnecessary ambiguity. Our comments and recommendations are outlined below:

**Matters to be Considered in the Issuance of a Licence**

The MNR states that this proposed new policy “*will help applicants understand what the ministry considers when reviewing a licence application and will provide guidance to staff in their review of applications and when making recommendations to the Minister for licence applications under the Aggregate Resources Act.*”

We recommend the following addition to the list of matters the Minister and Tribunal member shall have regard to:

- the effect of blasting on public safety, for blasting quarries.
- any possible effects to local air quality emissions.
- any possible negative impacts on nearby wildlife and ecosystems

In applying Section 12 of the ARA, the MNR proposes, in the new policy, *that municipal comments and recommendations(c), must be “carefully considered” by the MNR and may be*

Ontario Nature @ Centre for Social Innovation, 720 Bathurst Street, Toronto, ON M5S 2R4  
T/ 416-444-8419 1-800-440-2366  
info@ontarionature.org ontarionature.org



*included as site plan conditions, especially regarding official plans, zoning by-laws, and truck traffic.*

We recommend the language in this section be changed from 'will be carefully considered' to 'must be consistent with the Official Plans and zoning bylaws as they relate to economic, environmental, health and safety matters'.

### **Cultural Heritage Reporting**

We recommend this section of the policy document be reviewed based on consultation with Indigenous communities. Specifically relating to "*Depending on comments received or interest expressed in response to the application, MNR may require that the operator engage interested/impacted Indigenous communities during archaeological studies undertaken in AP areas*", we urge 'may require' be changed to 'shall require', emphasizing the Crown's duty to consult.

### **Expansion of a Licenced Area**

The proposed update to expanding a licenced area may allow for a more simplified process for aggregate companies, instead of having to file a new licence. However, we are concerned that this change fails to meet the need for due diligence. There is a risk that expanding a pit or quarry without adequate assessment will present risks to the environment, public health and safety, or fail to address existing regulatory compliance issues.

### **A.R.2.03.02 Licence Site Plan Amendment to Extract Within Water Table**

Eliminating the requirement that *extraction into the water table within 1.5 metres for a pit and 2 metres for a quarry undergo a site plan amendment with technical studies, MNR reviews, and public notification* is problematic. Removing the proposed policy unduly benefits aggregate companies while transferring the risk to local wells and possible contamination of aquifers to the public and government. We are further concerned that this policy change reduces transparency for the public.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony Morris".

Tony Morris  
Conservation Policy and Campaigns Director  
Ontario Nature