



Public Works

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September 22, 2025

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

Dear Ms. Tower and team:

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

Peel Region appreciates the opportunity to comment on the proposed amendments to the Aggregate Resources Act program. Peel Region staff comments and questions are included below.

PEEL REGION STAFF COMMENTS

Water Report

- The proposed policy does not adequately address the combined water impacts from multiple nearby aggregate operations. Peel Region staff recommend requiring a Cumulative Impact Assessment, especially in vulnerable areas.
- Multi-year monitoring data collection is only recommended in regions with fluctuating water tables or ecologically sensitive areas. Peel Region staff recommend that this language be strengthened to *require* monitoring in these regions, at least for a set duration, with a minimum monitoring frequency.
- The inclusion of a water balance analysis as part of a Level 2 assessment is supported. Peel Region staff recommend setting risk triggers that correspond to an identified type of water balance analysis to be required (for example, desktop monthly or annual water balance versus hydrologic model continuous daily or hourly step). This approach would aid in impact assessment.

Maximum Predicted Water Table Report

- This report allows use of nearby studies/reports or historical data. Peel Region staff expressed concerns about reliability of the data. How will these alternative studies be validated?
- More detail is needed on monitoring depth. The policy states that if the water table is "substantially below" excavation depth, exact monitoring may not be needed. This ambiguous language could result in inadequate or no monitoring being done. Peel Region staff recommend at least minimum monitoring standards, regardless of perceived water table depth. If the proposed policy statement related to water table



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depth moves forward as outlined, Peel staff recommend that you replace “substantially below” with a quantitative distance.

- The inclusion of groundwater levels expressed in metres above sea level is supported. Geodetic surveyed elevations would allow for further quality assurance and control, especially when comparing historic data with data from nearby sites. Peel Region staff recommend to further highlight the importance of stabilized/static water levels recorded via manual measurements by use of a digital tape measure and/or continuous (automated) measurements with a data logger.

Matters to be Considered in Issuance of a New Licence

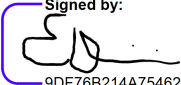
- Site plans are the primary instrument that regulate how the site is to be operated (e.g., depth of extract) and rehabilitated (e.g., wet vs dry). Given that rehabilitation plans (e.g., wet vs dry) can substantially influence the water balance to third parties (nearby water well users, groundwater dependent ecosystems, etc.), Peel Region staff recommend that rehabilitation plans continue to be included in the site plan in all cases as per the current policies, as opposed to "where appropriate" as per proposed policy.

CONCLUSION

Peel Region staff support several of the proposed policy changes and recommend that the Ministry also incorporate the changes outlined to ensure long-term protection of groundwater resources and community sustainability.

If you have any questions or require more information, please contact me at elvis.oliveira@peelregion.ca.

Regards,

Signed by:

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Elvis Oliveira

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