

Ministry of Natural Resources – Development and Hazard Policy Branch
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VIA ENVIRONMENTAL REGISTRY SUBMISSION

September 25, 2025

Subject: ERO number 025-0216 Updating and modernization of operational policies supporting the delivery of the provincial Aggregate Resources Act program

This letter provides comments from Professional Geoscientists Ontario (PGO) on ERO posting 025-0216.

PGO is a self-regulatory organization governing the practice of professional geoscience in Ontario and reporting to the Minister of Energy and Mines. PGO protects the public by regulating Ontario registered geoscientists and advancing professional practice. To support PGO in fulfilling its mandate, the Environmental Geoscience Subcommittee reviews and comments on proposed regulatory changes affecting environmental geoscience practice and professionals.

PGO has reviewed the proposed changes to those Technical Reports required by the Aggregate Resources of Ontario: Technical Reports and information Standards (August 2020), that relate to groundwater, namely the Maximum Predicted Water Table Report and the Water Report. The PGO has the following comments on these two reports, which may improve the clarity of the information required in those reports, specifically:

- In the Water Report, for exemptions to the requirements for a Level 1 and Level 2 report in Section 4.0 Remote Areas on Crown Land:
 - a definition of a water well should be provided to distinguish active water supply wells from monitoring wells or abandoned wells,
 - the 500 m limit for a coldwater stream should be expanded to include groundwater dependent wetlands,
 - a reference for the definition of a coldwater stream should be provided,
 - the 5 km limit for sensitive receptors should be removed, given that sensitive receptors are defined as dwellings, which have no bearing on hydrogeological impacts, and
 - all the distance limits should be described as guidelines or minimum distances, which should be expanded to the extent of the Zone of Influence of dewatering or include downgradient areas, where there are reasonable grounds to indicate the Zone

of Influence will be greater than the distance limits or there may be significant changes to groundwater conditions downgradient of the proposed pit/quarry.

- In the Water Report, Section 2.2 Zone of Influence should include the areas which “may experience groundwater level declines” and features which may experience significant reductions in groundwater discharge.
- In the Water Report, Section 3.1 Data Collection: Water level data is required to be collected for one year; however, a frequency or timing of measurement is not given. It is suggested that, at a minimum, groundwater levels be collected during periods of seasonal high groundwater levels.
- In the Maximum Predicted Water Table Report, Section 4.0, there is a reference to “Professional Geoscientists of Ontario (PGO) Professional Practices Guidelines for Ground Water Resources Evaluation, Development, Management and Protection Programs in Ontario, 2004”. This document was issued in 2004. PGO notes that the document is currently under review by the Environmental Geoscience Subcommittee. Therefore, the existing version may not fully reflect evolving practices or regulatory expectations.
- In the list of policies to be rescinded, for a number of policies, it is not clear which policies will replace the rescinded policy, or whether in rescinding the policy, the associated procedures are also rescinded:
 - In rescinding A.R.2.03.02, which specifies that expansion requires a new licence application harmonized under the old license number, the new policy/procedure for considering license expansion is not clear.
 - In rescinding A.R.2.03.02, which addresses extraction below the water table, the new policy and procedure for extraction below the water table is not clear.
 - In rescinding A.R.5.00.18 (TOARC) and A.R.5.00.19 (MAPP), it is not clear how abandoned aggregate pits are to be addressed.
 - In rescinding A.R.7.00.00, which addresses enforcement, enforcement guidance is not clear.

Thank you for the opportunity to consult on this proposed regulatory change.



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Chair Environmental Geoscience Subcommittee



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