



September 25, 2025

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Ministry of Natural Resources  
300 Water Street, 2<sup>nd</sup> Floor, South Tower  
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**Re: Comments on ERO# 025-0216: Updating and Modernizing of Operational Policies supporting the Delivery of the Provincial Aggregate Resources Act Program**

On behalf of Concrete Ontario and the Cement Association of Canada, we would like to express our support for the comments submitted by the Ontario Stone, Sand and Gravel Association (OSSGA) regarding the proposed policy updates under the Aggregate Resources Act.

Clear and predictable policies that recognize the vital role of aggregates are essential to Ontario's growth and infrastructure development. Reliable, close-to-market sources of aggregate are critical to ensure that cement and concrete producers and the broader construction sector have timely access to the materials needed to deliver on record levels of housing, transit, and infrastructure investment.

Policies that enable responsible, efficient access to aggregate will not only reduce costs and delays but will also minimize transportation-related emissions and strengthen Ontario's supply chain resilience.

We would like to particularly emphasize two main points in the submissions provided by OSSGA.

With respect to planning and land use, OSSGA has highlighted the need to reinforce the Aggregate Resources Act's (ARA) primacy in governing aggregate operations. They have raised concerns about recent attempts by municipalities to regulate pits and quarries, either directly or indirectly, in ways that conflict with the ARA and recommend that policies clearly reference Section 66 of the Act to emphasize provincial oversight. They also note that while municipal and provincial planning comments must be considered, the test under the ARA is whether zoning prohibits aggregate uses. Some municipalities pre-zone aggregate lands, and in other cases fail to provide timely

comments, which should not unnecessarily delay licence approvals. Clear guidance from the Ministry will help ensure consistent, fair, and efficient decision-making in line with provincial policy.

On the matter of quality and quantity of aggregate, OSSGA has recommended that the policies explicitly reference the Provincial Policy Statement (PPS 4.5.2.1), which directs that mineral aggregate resources be made available as close to markets as possible and that a demonstration of need is not required. This principle is fundamental to maintaining a sustainable, reliable supply of aggregate, minimizing transportation distances, and ensuring that Ontario has the resources necessary to support housing, transit, and infrastructure priorities. Recognizing the PPS direction in policy will help protect the long-term viability of Ontario's aggregate supply and reduce costs and emissions tied to moving material further from market.

We thank you for considering our feedback on this important matter.

Sincerely,



Bart Kanters, President  
Concrete Ontario



Adam Auer, President & CEO  
Cement Association of Canada

c.c.:  
Michael McSweeney, Executive Director, OSSGA