



Springwater Green Community Coalition

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Ms. Sheena Tower

Ministry of Natural Resources: Development and Hazard Policy Branch

300 Water Street

Peterborough, ON

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aggregates@ontario.ca

RE: **ERO #025-0216**, Updating and Modernization of Operational Policies Supporting the Delivery of the Provincial Aggregate Resources Act Program

Dear Ms. Tower,

The Springwater Green Community Coalition (SGCC) has reviewed the proposed changes to operational policies under the Aggregate Resources Act (ARA). Overall, the primary beneficiaries of these updates appear to be aggregate operators rather than the people of Ontario. Many of the proposed changes reduce accountability and limit public knowledge of significant operational changes, including below-water-table extraction.

We do acknowledge positive elements, such as requiring the Ministry to issue a licence only if future operations will have no negative impacts on groundwater or surface water, as well as

incorporating Agricultural Impact Assessments in prime agricultural areas to avoid or minimize negative impacts. However, several proposed policies raise serious concerns that require stronger protections for communities, the environment, and public health.

Matters to be Considered in the Issuance of a Licence

The Ministry's proposed new policy outlines what staff and applicants should consider during licence applications. We recommend the following additions to the matters the Minister and Tribunal must have regard to:

- The effect of blasting on public safety for quarry operations.
- Any/All potential impacts on local air quality emissions.

Where municipal comments and recommendations are provided, the proposed policy states that they "will be carefully considered." The Springwater Green Community Coalition (SGCC) recommends that this language be strengthened so that decisions must be consistent with municipal Official Plans and zoning bylaws, especially in matters affecting public health, safety, and the local economy. This ensures that local planning authorities retain meaningful oversight and that community interests are fully respected in aggregate operations.

Cultural Heritage Reporting

The proposed policy states that the Ministry "may require" operators to engage with Indigenous communities. The Springwater Green Community Coalition (SGCC) strongly recommends that this language be strengthened to "shall require", making engagement mandatory rather than optional.

Consultation with Indigenous communities is essential to ensure that their rights, interests, and traditional knowledge are respected. Indigenous peoples have a unique and legally recognized connection to the land, including cultural, historical, and spiritual heritage that must be protected. Requiring mandatory engagement not only upholds these rights but also enhances the quality and integrity of cultural heritage reporting, ensures informed decision-making, and fosters trust and accountability between operators, the Ministry, and affected communities

Expansion of a Licensed Area

Allowing operators to expand a licensed area without requiring a new licence application poses significant risks. Without adequate environmental and regulatory review, such expansions could compromise public health, safety, and environmental protection. The SGCC strongly recommends that any expansion of a licensed area require a full licence application, including technical studies, public notification, and regulatory review. Streamlining this process for operators without safeguards shifts risk to the public and undermines the purpose of the

Aggregate Resources Act. Maintaining rigorous review and oversight ensures environmental protection, public safety, and community accountability

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

The proposal to remove the requirement for site plan amendments, technical studies, and public notification when extracting into the water table is deeply concerning. Eliminating these safeguards disproportionately benefits industry while transferring risks of groundwater contamination and aquifer disruption to the public. It also reduces transparency and weakens community oversight.

Enforcement and Compliance AR 7.00.01 Provincial Offences Act (POA)

We recognize the positive step of reviewing applicants' histories of violations. However, rescinding the structured enforcement policy that guided inspectors in escalating to charges undermines accountability. Without a clear framework, prosecutions are likely to decrease, despite the Auditor General's 2023 finding that less than 1% of violations were referred for charges. Retaining and strengthening enforcement tools under the ARA is essential to ensuring compliance, minimizing risks, and protecting nearby communities.

The Ministry of Natural Resources and Forestry has shown a glaring failure in its duty to protect residents, as inspections are infrequent, enforcement is weak, and violations rarely result in charges. This lack of accountability has left communities to bear the health, safety, and environmental consequences of poorly regulated aggregate operations. Stricter rules, stronger oversight, and mandatory enforcement measures must be required to restore public trust and ensure that operators are held fully accountable under the law.

Conclusion

The SGCC urges the Ministry to revise these policies to reflect a balance between the aggregate industry's economic role and the public's right to health, safety, environmental protection, and transparency. Strengthened enforcement, meaningful consultation, and rigorous review processes are essential to restoring public trust and ensuring the ARA fulfills its purpose of regulating aggregate operations in the public interest.

Thank you for considering our comments.

Sincerely,

Esther Allen

Springwater Green Community Coalition (SGCC)