



**ONTARIO
RIVERS
ALLIANCE**

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15 December 2015

Katie Rosa
Aggregate Resources Officer
Ministry of Natural Resources and Forestry
300 Water Street
Peterborough, Ontario
K9J 8M5

By Email: Katie.Rosa@Ontario.ca

Re: EBR 012-5444 – A Blueprint for Change – Policy Framework - Aggregate Resources Act

Dear Ms. Rosa:

Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization acting as a voice for several stewardships, associations, and private and First Nation citizens who have come together to protect, conserve and restore healthy river ecosystems.

ORA is writing in response to the province's blueprint of proposed changes to modernize and strengthen the policy framework for managing Ontario's aggregate resources. ORA's primary concerns are related to the potential impacts of aggregate extraction on private wells, aquifers, wetlands, lakes and rivers; however, we are also concerned with the loss of prime farmland, and in particular, Class 1 agricultural soil.

ORA is pleased to see enhanced requirements for impact assessment related to the natural environment, water, and cultural heritage. However, **it is important that risk assessment take into account all wetlands - not just coastal wetlands, and is expanded to include private wells – not just municipal wells.** The new requirement for a Terms of Reference for applications proposing to extract aggregate from the bed of a lake or river is also welcome.

The Highland Mega Quarry was to pump 600-million-litres of water every day, forever. Yet, the company was under no obligation to rehabilitate the pits because the operation would have been below the water table. ORA strongly recommends that provisions related to applications stipulate that **there will be no below-the-water-table extraction allowed that could impact negatively on aquifers, rivers, lakes, prime farmland, or specialty crop areas.**

ORA supports the proposed Agricultural Impact Assessment (AIA), in recognition of cumulative burdens on communities and the environment, and independent expert analysis of 'soil capability'. However, it is important that the government takes the bolder steps it proposed to "better protect farmland." Prime farmland (Class 1-4) is a non-renewable resource capable of growing our food in perpetuity. But once it is paved over or mined, it is gone forever. The revised ARA must require, that **should an aggregate application impact Class 1 farmland or Specialty Crop areas, then the application would be denied.**



ORA supports the improved timeframes, notification areas and consultation requirements for new site applications. However, considering the importance of public and First nation consultation, **ORA recommends a minimum of a 45-day comment period for both Crown and private land permits and licences.**

ORA recommends **caution in a 'permit by rule' or streamlining of the process that exempts individuals or companies from the requirement of a permit or licence to extract aggregate under any circumstances.** It is important to avoid impacts through full and proper assessment, rather than the costly and potentially ineffective attempts to repair damages once they have occurred.

ORA is pleased with the new provisions allowing the Ministry to require additional studies, information and updated site plans on existing aggregate sites related to source water protection, however, **these provisions should also apply to private wells and aquifers.**

To lessen the demand for new aggregate pits, ORA also encourages the use and promotion of recycled aggregate whenever possible.

*"Climate change is the critical issue of our time."*¹ Healthy rivers are the key to successful adaptation to the extremes of climate change. Protecting our freshwater must be recognized as an issue of national security.

As the devastating effects of climate change are teaching us, we must act swiftly to protect and maintain the resiliency and health of our freshwater resources and our land, which are essential to our very survival on this planet.

Sincerely,

Linda Heron
Chair, Ontario Rivers Alliance

¹ *Ontario's Climate Change Discussion Paper 2015, Minister's Message, Glen Murray, Minister of Environment and Climate Change. P-3.*