



## **GREEN GRAVEL: Priorities for Aggregate Reform in Ontario**

Aggregates are important to society – we use them for our homes, schools, hospitals, businesses, roads and transit, and environmental works, among other purposes. At the same time, their extraction has inherently disastrous effects on our air, water, natural and hydrologic features, agricultural lands and other competing land uses, climate and community quality of life.

**The current “business as usual” policies for extraction of stone, sand, gravel and shale in the Province of Ontario are unsustainable.**

Aggregate extraction, particularly as a non-renewable resource, has not been subject to 3Rs principles (reduce, reuse, recycle) as has begun with our forests, energy, and other consumptive products/wastes. Numerous recent reports, including Special and Annual Reports by the Ontario Environment Commissioner since 2003, have repeatedly documented these issues and concerns and have called for a range of reforms. These reports have also confirmed that the aggregates program in Ontario has been suffering from inadequate capacity in terms of staffing, budget and expertise resulting in serious compliance, inspection and enforcement limitations.

We need aggregate resource legislation that ensures effective management of abandoned, operating, and future pits and quarries, for the protection of our environment, food lands, and natural heritage lands. We need to recognize that aggregate extraction can affect and harm the rights, interests and cultural sites as archaeology of First Nations. The *Aggregate Resources Act* and *Planning Act* must be reformed to address Ontario’s constitutional duty to notify and consult affected First Nations and appropriate government ministries and the aggregate industry must give immediate attention to the priorities listed below.

### ***Priorities:***

**1. Develop and implement a long term conservation strategy for aggregates.** Establish provincial capacity independent of the industry and The Ontario Aggregate Resources Corporation (TOARC) to forecast future demand and supply needs and maintain data. Maintain up to date aggregate resource inventories. Optimize the thousands of existing licenses before issuing new licenses. In the face of climate change we need to conserve. Develop a comprehensive 3Rs strategy – with quantifiable targets – along with the use of alternative and composite materials. Address corollary policies such as Ministry of Transportation 400 series and other highway specs as well as municipal specs. Increase fees paid by the industry and do so on an annual basis as both a market signal to drive 3Rs innovations and to sufficiently fund the proposed regulatory framework.

**2. Ban new aggregate extraction in the Greenbelt, the Niagara Escarpment, the Oak Ridges Moraine, and Class I, II and III agricultural lands adjacent or contiguous to these designated areas.** Make use of Minister's Zoning Order(s) under the *Planning Act* to immediately stop any new aggregate extraction in these key green spaces, their natural and hydrologic features, habitat and corridors. Amend the relevant legislation and Plans – the *Greenbelt Act* and Plan, the *Niagara Escarpment Planning and Development Act* and the *Oak Ridges Moraine Conservation Act*, and the *Planning Act* to protect the Greenbelt, Niagara Escarpment, Oak Ridges Moraine and our most valuable agricultural land from new aggregate extraction forever.

**3. Redesign the licensing and permit approvals process to make it more fair and balanced for the public interest and the environment.** Level the playing field during the review process from the current situation where the industry proponent takes years to prepare a complex application, with extensive funds and ministry advice, and the public is given 45 days to respond and counter propose under the Aggregate Resources Act. Change the timeframes to allow for meaningful public review. Reintroduce intervenor funding for aggregate extraction review processes as well as other development applications. Make all application, companion technical studies and updates readily accessible to the public (including on-line). Change the ministry(ies) role to comprehensive evaluator and decision-maker from advocacy. Move to eliminate perpetual licenses and permits as well as unlimited annual tonnage allowances.

**4. Develop and implement more effective and credible mechanisms for compliance, inspection and enforcement of aggregate operations and rehabilitation. Enforce provincial laws and site plans.** The industry should not be policing itself. Make use of modern GPS, satellite and real-time video technologies to monitor aggregate operations on-site and during hauling. Post material on company and ministry websites. Increase ministry capacity to conduct regular inspections and establish a work plan with targets and timetables to increase the frequency of inspections. Establish specific rehabilitation targets for current licensees and abandoned sites, including significant penalties for failure to achieve up to and including license suspension and denial of new licenses.

**5. Address personal and environmental health concerns by implementing mandatory standards and monitoring of dust or airborne particulate matter and carbon dioxide (CO<sub>2</sub>) from extraction and production activities associated with extraction. This includes detailed analysis for specific mineral content and CO<sub>2</sub> emissions.** Due to the 'close to market' location of quarry sites, particulate matter affects significant numbers of people. Crystalline silica dust is a common by product from processing crushed stone, sand and gravel and is a known carcinogen. Mitigation measures for pits and quarries are inadequate. And though 'close to market' may mean shorter truck haulage journeys – even having been argued by MNR as an example of good practice regarding CO<sub>2</sub> emissions, other, greener, modes of transport (boat, barge and rail) need to be given serious consideration. Further, the other side of the aggregate industry – cement production – is a nationally significant producer of greenhouse gases

The undersigned environmental and community groups agree that reform of Ontario's aggregate regulatory, policy, operations and governance framework must, at a minimum, include these reform priorities in order to better manage the aggregate resource, minimize urban sprawl and to protect our drinking water, air quality, our natural heritage systems and our local communities.

## **Members of the Ontario Greenbelt Alliance**

1. Altona Forest Stewardship Committee
2. Best Environment for Streetsville
3. Blue Mountain Watershed Trust Foundation
4. Bond Head/BWG Residents for Responsible Development
5. Brampton Environmental Community Advisory Panel
6. Canadian Association of Physicians for the Environment (CAPE)
7. Canadian Environmental Law Association
8. Canadian Institute for Environmental Law and Policy
9. Canadian Organic Growers
10. Canadian Parks and Wilderness Society - Wildlands League
11. Castle Glen Ratepayers' Association
12. Citizens Environment Alliance of Southwestern Ontario
13. Citizens' Environment Watch
14. Clear the Air Coalition
15. Coalition of Concerned Citizens of Caledon
16. Coalition on the Niagara Escarpment
17. Community Preservation Initiative
18. Conservation Council of Ontario
19. Conservation Development Alliance of Ontario
20. Credit River Alliance
21. David Suzuki Foundation
22. Earthroots
23. Environmental Defence
24. Environment Hamilton
25. Evergreen
26. Federation of Urban Neighbourhoods (Ontario) Inc.
27. Friends of Boyd Park
28. Friends of Fairy Lake
29. Friends of the Don East (FODE)
30. Friends of the Farewell
31. Friends of the Rouge Watershed
32. Friends of Rural Communities and the Environment (FORCE)
33. Friends of the Twelve
34. Green Incorporated
35. Greenpeace Canada
36. Green Tourism Association
37. Halton - Peel Woodlands and Wildlife Stewardship Council
38. The Humane Society of Canada
39. Innisfil District Association
40. King Environmental Groups
41. The Lakewatch Society
42. North East Sutton Ratepayers Association
43. Oak Ridges Moraine Land Trust
44. Oak Ridges Trail Association
45. Oakvillegreen Conservation Association
46. Ontario College of Family Physicians
47. Ontario Farmland Trust
48. Ontario Nature - Federation of Ontario Naturalists
49. Peel Environmental Network

50. Pembina Institute for Appropriate Development
51. Personal Computer Geographic Education System/Software - PCGES
52. Pesticide Free Ontario
53. Pomona Mills Park Conservationa lists
54. Preston Lake Environmental Association (PLEA)
55. Protecting Escarpment Rural Lands (P.E.R.L.)
56. Protect our Water and Environmental Resources (P.O.W.E.R)
57. Preservation of Agricultural Lands Society
58. Public Spaces Appreciation Association of Ontario
59. Registered Nurses Association of Ontario
60. Rescue Lake Simcoe Coalition
61. Richmond Hill Naturalists
62. Riversides
63. Rouge Duffins Greenspace Coalition
64. St.Catharine's CAN (Climate Action Now)
65. Save the Maskinonge
66. Save the Oak Ridges Moraine Coalition
67. Save Our Ravines - Halton Hills
68. Save the Rouge Valley System.
69. Sierra Club of Canada (Ontario Chapter)
70. Sierra Legal Defence Fund, Ontario Office
71. SMART Growth Network
72. South Lake Simcoe Naturalists
73. South Peel Naturalists Club
74. Sunfish Lake Association
75. Toronto Environmental Alliance
76. West Whitby Community Against 407 Link Location (WW-CALL)
77. Whole Village
78. Willow Park Ecology Centre
79. [www.valleyvoices.ca](http://www.valleyvoices.ca)
80. York Region Environmental Alliance
81. 407 Action Group