



May 24, 2015

Land Use Planning Review
Ministry of Municipal Affairs and Housing
Ontario Growth Secretariat
777 Bay St, Suite 425 (4th Floor)
Toronto, ON
M5G2E5

RE: OSSGA Comments on the 2015 Co-Ordinated Plan Review

The Ontario Stone, Sand and Gravel Association (OSSGA) is a not-for-profit association representing over 280 sand, gravel and crushed stone producers and suppliers of valuable industry products and services. Collectively, our members supply the substantial majority of the 164 million tonnes of aggregate consumed, on average, annually in the province to build and maintain Ontario's infrastructure needs. OSSGA works in partnership with government and the public to promote a safe and competitive aggregate industry contributing to the creation of strong communities in the province.

OSSGA appreciates the opportunity to provide comments to the 2015 Co-ordinated Plan Review. Our members work and live in the plan areas and the review of these plans is important for our organization. Our submission includes this letter, which answers the relevant questions pertaining to aggregates from the workbook provided, and the documents *"The Future of Ontario's Close to Market Aggregate Supply: The 2015 Provincial Plan Review – Aggregate Discussion Paper"* and a short synopsis: *"The Future of Ontario's Close to Market Aggregate Supply – The 2015 Provincial Plan Review"*.

This letter begins with highlights of the submission presented in our discussion paper, which is then followed by the Association's answers to the specific questions posed by the Review Panel in "Our Region, Our Community, Our Home". The questions have been answered in the order they were asked, but please note that we have only included the questions we feel are relevant to the discussion of aggregate.

Highlights of OSSGA Submission

Aggregate resources are essential resources in Ontario. The production of aggregate is tied closely to the economic health of the province, and is a major contributor to the development of infrastructure in the province.

- The Greater Golden Horseshoe (GGH) includes 8.8 million people (2011), contains approximately 70% of Ontario's population and currently has a major infrastructure deficit.
- The Province is investing more than \$130 billion in public infrastructure over the next 10 years and is planning to add another 4.5 million people to the GGH over the next 30 years.
- The GGH consumes approximately 90 to 100 million tonnes of aggregate per year (more than half of Ontario's total consumption) to support the existing and growing population.
- As such, aggregate production is directly tied to economic conditions and has a close correlation with the GDP.

The Provincial Plan Areas are the Close to Market Source of Aggregate for the GGH

- Provincial Plan Areas supply 35% of the Greater Golden Horseshoe's total aggregate needs.
- In 2013, aggregate production from the Provincial Plan Areas was approximately 30 million tonnes which represents 21% of Ontario's production, 43% of GGH's production and 87% of GTA's production.
- The Provincial Plan Areas contain the highest quality close to market sources of aggregates for the GGH.
- There are significant environmental and economic benefits of extracting aggregate close to market; the alternative is to extract and truck aggregate from further regions in the province, thereby significantly increasing transportation costs, greenhouse gas emissions, and wear and tear of the haul routes used to transport the aggregate.
- Alternate modes of transportation, e.g. rail or ship, are currently not feasible due to the lack of rail infrastructure, intermodal transport hubs, and suitable depots at shipyards to store the aggregate.

Mineral Aggregate Operations Represent a Small Percentage of the Total Land Area

- **While the Provincial Plan Areas contribute a significant amount of aggregate production, only 1.5% of the Plan Area is licensed for aggregate extraction and only 0.6% is subject to active aggregate extraction.**

The provincial plan review should not consider any new prohibitions on aggregate extraction. The aggregate industry is heavily regulated, and the Provincial Plans protect the most significant features and include stringent requirements that must be met before new licences can be issued. The rehabilitation bar is high. As a result, only environmentally appropriate sites with beneficial rehabilitation plans can be approved.

The current land classifications in the provincial plan areas preserve the natural and environmental benefits while providing sufficient aggregate resources to meet current demand, while only designating 1.5% of the area for aggregate extraction (and only 0.6% of the land is subject to active aggregate extraction.)

For these reasons, we urge the government to continue to strike the balance it has already established and maintain the status quo within the Provincial Plan Areas.

Questions posed by Review Panel in “*Our Region, Our Community, Our Home*”

4.1 Protecting Agricultural Land, Water and Natural Areas

- c. What new approaches or tools could be used to protect agricultural land, water and natural areas?*
- d. How can we grow and strengthen the region’s network of open spaces to provide for recreational opportunities?*

Aggregate producers recognize the importance of natural and agricultural areas in the plan areas. OSSGA views rural areas as resource areas where agriculture, natural heritage resources and aggregate resources take priority. As such OSSGA takes the protection of natural and agricultural areas very seriously. The aggregate industry is required under more than 25 different pieces of legislation to prove that extraction conforms to the highest environmental standards. OSSGA suggests that the plans continue to recognize the balance between aggregate, agriculture and natural features.

The rehabilitation of licensed pits and quarries has contributed to the natural heritage, open space and agricultural network in the plan areas. In 2010 OSSGA conducted a study of rehabilitated licensed sites in the plan areas. This study provided vital statistics on the after-use of aggregate sites. The results of this study are summarized here:

Within the Greenbelt Plan Area, there were 81 surrendered licences of interest. The most common land uses of these rehabilitated sites within the Greenbelt Plan Area were: natural (49%), open space (12%), and water (9%), followed by recreation, agriculture, industrial, residential, commercial and other. No institutional rehabilitation was observed within the Greenbelt Plan Area.

The 81 sites within the Greenbelt Plan area were sub-divided into the Niagara Escarpment Plan area (NEPA) (26 sites), the Oak Ridges Moraine Conservation Plan area (ORMCP) (21 sites), and the Protected Countryside (34 sites).

The predominant land uses within the NEPA area were natural (48%), open space (13%), water (12%) and agriculture (9%), followed by marginal proportions of recreational, residential and industrial.

Twenty-one sites fell within the jurisdiction of the ORMCP, where the most common rehabilitated land uses were natural (52%), open space (14%), and recreational (9%), followed by marginal proportions of industrial, residential, water and commercial land uses.

Predominately, the current land uses within the protected countryside of the Greenbelt, and any plan area overlap with the Lake Simcoe Protection Plan (LSPP), were natural (47%), open space (11%), agriculture (11%) and water (10%), followed by marginal proportions of recreational, industrial, commercial, residential and other land uses.

These statistics show that former aggregate sites are being rehabilitated back into productive uses that conform to the goals of the plans in their area.

OSSGA understands that the policies related to aggregate in relation to the protection of agricultural land, water and natural areas will be under close review, and that the panel will likely receive input suggesting that further restrictions be placed on land usage as a tool to provide future protection.

For this reason, it is important that the Review Panel understand that research has shown that aggregate extraction is an interim use and is not a threat to water. In addition, extraction causes only a minimal disturbance to agricultural, or recreational use of land. Rehabilitation of aggregate sites provides new natural features, open spaces and (as discussed further below) new agricultural lands.

In addition, safeguards already enshrined in the Provincial Plans and legislation ensure that these features are protected while allowing for appropriate aggregate extraction.

One new approach could be to emphasize that rehabilitation efforts be better coordinated to create linkages of natural features where they may have not previously existed.

4.2 Keeping People and Goods Moving, and Building Cost-Effective Infrastructure

d. How can the plans better support good movement by all modes of transportation?

f. How can the plans better balance the need for critical infrastructure to support economic growth with environmental protection?

Aggregate resources are used to build Ontario's infrastructure including highways, roads, transit lines, hospitals, airports and other residential, institutional and industrial buildings.

The aggregate industry is important to the economic health of Ontario. Local aggregate products support Ontario's \$37 billion construction industry allowing for the employment of 292,000 Ontarians. Ontario aggregate producers employ more than 7,000 people directly and more than 34,000 indirectly. The aggregate industry contributes an estimated \$1.6 billion of Gross Domestic Product (GDP) to the provincial economy.

The aggregate industry makes a significant contribution to Ontario's economy, and it is also the backbone of affordable, quality infrastructure development.

The plans must maintain the balance between environmental protection and preserving close to market aggregate reserves. The current policy regime provides suitable protection of environmental resources while still allowing for extraction to take place in an appropriate manner. The implications of maintaining close to market resources are discussed in detail in the discussion paper attached to this letter.

4.4 Building Communities that Attract Workers and Create Jobs

How can the plans better support the development of communities that attract workers and the businesses that employ them?

c. How can the plans balance the need for resource-based employment, including the agri-food and mineral aggregates resource sectors, with protecting the natural environment?

Maintaining a balance between rural resources, especially aggregates and agricultural land, is important. Many of the geological formations that provide our aggregate resources also provide our agricultural resources, our recreation lands, our forests, and our tourism destinations. The challenge is to strike the appropriate balance among these competing resource interests.

The location of aggregate resources is fixed. Stone, sand and gravel have to be extracted where they occur. It is not like other forms of development such as homes, stores or recreation areas that can be built in many different places. Additionally, not all areas of the province have aggregate deposits – they are only found in certain geological formations and certain locations.

While not intuitive, aggregate operations can, and do, increase the agricultural potential of the landscape. For example, the moraine landscape is not naturally conducive to agriculture – but if an aggregate producer were to remove the hummocky topography in the moraine (i.e. extract gravel) and bring the land to a grade that *is* conducive to agriculture – in its rehabilitated state, this process would in fact add to the agricultural capability of the land.

The fact is that the impact of aggregate licensing on agricultural lands is minimal. To illustrate, during the Standing Committee hearings on the ARA Review, concerns were expressed regarding the loss of prime agricultural lands as a result of aggregate extraction. The data revealed that **of the approximately 4.9 million ha of prime agricultural land in southern Ontario, only 35,000 ha contain an aggregate licence (0.7% of prime agricultural land)**. This would not reflect the amount of prime agricultural land lost as a large portion of these licences would be rehabilitated back to prime agricultural land in accordance with provincial policy.

The loss of agricultural land in the plan areas is largely due to other forms of development. Taking into account the importance of close to market supplies, OSSGA believes that stricter regulations for aggregate development on agricultural land are not appropriate. As such, OSSGA is seeking to maintain the status quo on extraction in agricultural areas.

4.6 Improving Implementation and Better Aligning the Plans

How can the implementation of the plans be improved?

- a. Are there opportunities to better align key components of the plans with each other, and with other provincial initiatives? Are there ways to reduce overlap and duplication?*
- b. What policies of the plans do you think have been successful and should be retained?*
- c. Should the province develop additional tools or guidance materials to help support implementation?*
- d. Are there other opportunities to better facilitate implementation?*

Implementation and consistency among the different plans remains an issue for aggregate producers. While it is recognized that the geographic, social and economic conditions of one municipality may vary from another, there should be consistency in each Provincial Plan Area in ensuring that significant aggregate resources are made available based on reasonable and objective policies. Specifically, the Provincial Policy Statement, recent Provincial Plans and current provincial legislation provide consistent definitions, delineation and strong protection for features such as significant wetlands, significant woodlands, species at risk habitat, prime agricultural areas and wellhead protection areas. There is no rationale for treating these features differently in any of the plans, specifically the NEP Area.

As such, we recommend that municipal official plans be required to defer to the aggregate resource policies of the Provincial Plans to protect the provincial interest in managing aggregate resources, and to avoid conflicting policies and costly hearings to defend the policies of the Provincial Plans.

Accordingly, the need for revisions to the Provincial Plans should not be based on perceptions or experiences with pit and quarry operations that pre-date current policy and regulatory controls but rather implementation experiences with operations approved since each of the Plans came into effect.

Conclusion

The Provincial Plans must ensure the availability of close to market aggregate. Why is this important?

- There are significant environmental and economic benefits due to reduced transportation and greenhouse gas emissions.
- The GGH requires over 2 billion tonnes of aggregate to sustain growth and build infrastructure.
- The Provincial Plan Areas supply 35% of the GGH's total aggregate needs.
- The Provincial Plan Areas contain high quality aggregate resources.
- Only 0.6% of the Plan Areas are under active extraction.
- The Provincial Plans protect the environment. Allowing extraction creates opportunities for public greenspaces and agricultural after uses.

For these reasons, **the provincial plan review should not consider any new prohibitions on aggregate extraction.** We urge the government to continue to strike the balance it has already established and maintain the status quo within the Provincial Plan Areas.

Attached is a paper titled "***The Future of Ontario's Close to Market Aggregate Supply: the 2015 Provincial Plan Review Aggregate Industry Discussion Paper***". This document contains a detailed set of comments to be considered along with this letter.

Thank you again for the consideration of our comments. Should you have any questions or concerns please do not hesitate to contact me at twigdor@ossiga.com or 905-507-0711.

Sincerely,

ONTARIO STONE, SAND & GRAVEL ASSOCIATION



Ted Wigdor
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