

SECURING ACCESS TO STONE, SAND & GRAVEL

Ensuring Economic Growth and Future
Greenspace in the Greater Golden Horseshoe



OSSGA's recommendations for securing
close-to-market aggregate.

Why do we need Aggregate?

Because without it, everything stops. Aggregate is stone, sand and gravel. It's in the buildings where we live and work, the roads and sidewalks we drive and walk on. It's used in water purification, and in the manufacturing of

everything from paper and paint to chewing gum and household cleaners. Demand for high-quality aggregate is growing, and new sources will be needed. It is critical we all **understand that everything starts with what's in the ground.**

Economic Need

- By 2041, there will be 18.2 million people in Ontario. To support this growth, **we will need 3.84 billion tonnes of aggregate** to build the roads, schools, hospitals, homes and other infrastructure that we all use.
- The industry is essential to the \$38-billion construction industry - supporting **357,000 jobs in Ontario.**
- The production of aggregates directly **employs 7,600 Ontarians, often in communities like yours.**

Production and Consumption Trends

- 111 million tonnes of aggregate is consumed in the GGH per year.
- By 2041, the GGH will consume another **2.5 billion tonnes** (over 71 million 35 tonne trucks) of which **1.5 billion tonnes** will be consumed by the GTA alone.
- On average from 2001 to 2005 the GTA produced 30.5 million tonnes of aggregate per year while it consumed 56 million tonnes.
- On average from 2013 to 2017 the GTA only **produced 20.8 million tonnes** of aggregate per year but **consumed 65 million tonnes.**

The Aggregate Footprint is Small

- **Only 1.5 %** of the Greenbelt, Niagara Escarpment and Oak Ridges Moraine Plan areas are **licensed for extraction** and just **0.6% is subject to active extraction** (i.e. disturbed area).
- Aggregate extraction is an interim use.
- **Since 1990, over 7,400 acres (100 + licenses) have been surrendered** and returned to other uses within these Provincial Plans Areas. After uses include natural heritage areas, publicly accessible greenspace and agricultural land.

Aggregate Shortage

The Provincial Plans have introduced policies which have restricted access to 67% of aggregate resources within the Greater Golden Horseshoe. In addition, several other constraints limit access to the remaining aggregate resource areas.

- In 1992, the State of Aggregate Resource Study identified that 40% of the aggregate consumed by the GTA was imported and warned of future aggregate shortages.
- Between 1991-2015 the GTA has been extracting aggregate three times faster than it is replacing new supply.
- As a result, in 2017 the GTA imported 72% of the aggregate that it consumed.

New Supply Needed NOW

- Since the approval of the NEP (1985), ORMCP (2002) and the Greenbelt (2005), only 0.1% of the Plan Areas have been licensed for aggregate operations.
- This is not sustainable.

The following pages outline OSSGA's recommendations for securing close-to-market aggregate.

Managing a Scarce Resource

- Just like gold, crushed stone, sand and gravel are scarce resources that can only be found where nature put them.
- Not all aggregate is the same quality or type.
- The availability of high-quality close-to-market aggregate is being depleted at a rate of 3:1.
- The new Growth Plan, as written, could **sterilize** a whole application **because of one butternut tree**.
- **Ontario needs a balanced approach to sourcing close-to-market aggregate now.**

ECONOMIC AND ENVIRONMENTAL IMPACTS OF SOURCING AGGREGATE FURTHER FROM THE JOB SITE

The average haul route for an aggregate truck is approximately 35 km. The increasing scarcity of close-to-market sites means that distance will increase.

If the average haul distance were to double to 70 km it would cost an extra **\$341 million** annually in transportation costs. Consider who will pay this cost as **60%** of aggregate is purchased by the public sector.

“Trucking resources long distances increases greenhouse gas emissions, which is one of the top environmental concerns in the world today” (MNR)



Consider that if every load had to travel just **one** extra km to reach its job site, an extra 2.5 million litres of fossil fuel would be used annually or **7,000** tonnes of GHGs.

Other Interesting Facts

- Of the **12.1 million acres of prime agricultural land** in southern Ontario, **only 0.7 % contains a licensed aggregate operation**. Many of these sites are being rehabilitated back to agriculture
- Healthy communities need publicly accessible open space in and around the Greater Golden Horseshoe. Rehabilitated close to market aggregate sites are providing strategically located and needed greenspaces.
- In and around the Greater Golden Horseshoe over **19,000 acres in 87 publicly accessible sites** (existing and planned) have been documented to date (e.g. conservation lands, public parks, golf courses, etc.).



THE STERILIZATION OF HIGH QUALITY AGGREGATE RESOURCES WITHIN THE GROWTH PLAN

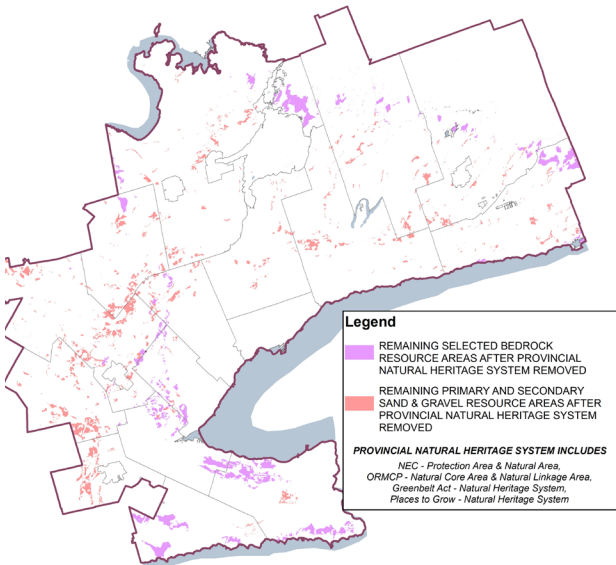
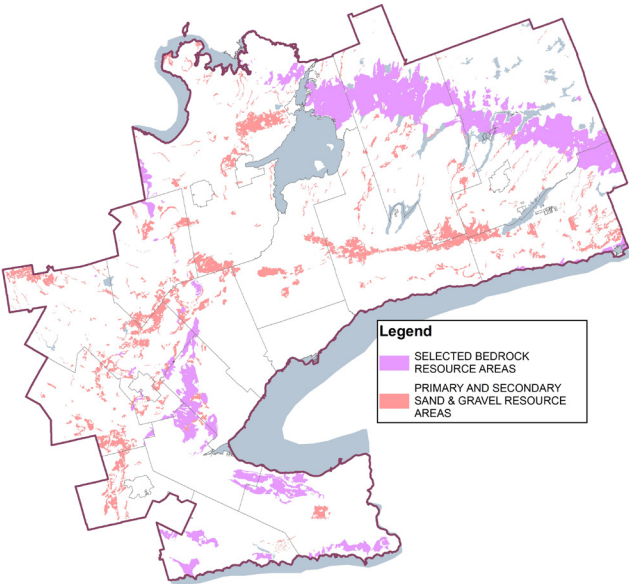
PARTY THAT APPROVED	YEAR	PROVINCIAL PLAN	POLICY	QUALITY RESERVES IMPACTED WITHIN GREATER GOLDEN HORSESHOE (GGH)
LIBERAL	1985	NEP	<ul style="list-style-type: none"> Prohibit extraction in Escarpment Natural Area and Protection Area. 	2 % 2 %
PC	2002	ORMCP	<ul style="list-style-type: none"> Prohibit extraction in Natural Core Area, subject to reconsideration in the next Plan review. Prohibit below water extraction in Linkage Area. 	6 % 3 %
LIBERAL	2005	GREENBELT	<ul style="list-style-type: none"> Added a Natural Heritage System and prohibited new operations within significant woodlands within that area. 	6 %
LIBERAL	2017	GROWTH PLAN, (EXCLUDING NEP, ORMCP & GREENBELT)	<ul style="list-style-type: none"> Expanded the Natural Heritage System and prohibited new operations within endangered and threatened species habitat and significant woodlands within this area. 	48 %
LIBERAL	2017	ORMCP	<ul style="list-style-type: none"> Prohibited new operations within endangered and threatened species habitat within linkage area. Prohibited extraction in Natural Core Area without review promised in 2002. 	Accounted for in 2002
LIBERAL	2017	GREENBELT	<ul style="list-style-type: none"> Prohibited new operations within endangered and threatened species habitat within the Natural Heritage System. 	Accounted for in 2005

Total % of Aggregate Resources Impacted by New Provincial Plan Policies:

67%

AREAS ELIGIBLE FOR EXTRACTION BEFORE PROVINCIAL NHS

AFTER 2017 NHS RESTRICTIONS IN PROVINCIAL PLAN



In addition to these restrictions, there are dozens of other constraints from the Provincial Plans to Regional and Local Official Plans to LPAT rules to NIMBY groups that further impede access to the remaining aggregate resources within the Greater Golden Horseshoe. **The approval process for new mineral aggregate operations takes 8-10 years and this is unacceptable for the aggregate industry, the public, and is a significant waste of government resources.**

THE RECOMMENDATIONS:

OSSGA'S SIX KEY RECOMMENDATIONS FOR SECURING ACCESS

1

ENDANGERED AND THREATENED SPECIES (ESA) HABITAT

Within the Growth Plan NHS, Greenbelt NHS and ORMCP Linkage Area

Allow aggregate extraction within endangered and threatened species habitat subject to authorization under the *Endangered Species Act*.

2

SIGNIFICANT WOODLANDS

Within the Growth Plan NHS, Greenbelt NHS and ORMCP Linkage Area, Countryside Area and NEP Escarpment Area

Permit extraction in significant woodlands that can be replaced and enhanced on the landscape subject to demonstration of 'no negative impact.'

3

PROVINCIALY SIGNIFICANT WETLANDS

Within the Greater Golden Horseshoe

Permit extraction in small Provincially Significant Wetlands that have limited ecological function or contribution to the provincially significant wetland complex.

4

BELOW WATER EXTRACTION AND OTHER NATURAL HERITAGE FEATURES

Within the ORMCP Natural Linkage Area

Permit extraction below water within the ORMCP Linkage Area. Permit extraction within natural heritage and hydrologic features subject to the provisions of the Provincial Policy Statement within ORMCP and NEP.

5

ORMCP NATURAL CORE AREA

Allow for consideration of extraction within the ORMCP Core Area Subject to Stringent Rehabilitation Requirements and Protection of Important Natural Features.

6

EXPANDING THE GREENBELT

The Province should suspend any further study to expand the Greenbelt Plan.

THE FIX:

ENDANGERED AND THREATENED SPECIES (ESA) HABITAT

Within the Growth Plan NHS, Greenbelt NHS and ORMCP Linkage Area

1

Allow aggregate extraction within endangered and threatened species habitat subject to authorization under the *Endangered Species Act*.

- Currently there are 117 endangered and 54 threatened species in Ontario. Due to the number of species, the transient nature of these species and their habitat requirements (i.e. forests, open fields, building structures, etc.) almost all current aggregate applications contain habitat of endangered and threatened species.
- Prohibition within this habitat undermines the *Endangered Species Act* and deters investment from the aggregate industry since new species or habitat could be identified during the approval process that prohibit the application after several years of process and millions of dollars invested.
- The solution is a win for the economy and the environment. The application is allowed to proceed if the Province is satisfied the application will result in an overall benefit for the species.



SITE STATS

This site is located within the Natural Heritage System of the Growth Plan. Potential extraction area being studied: 32 ha (79 ac). Site contains 32 million tonnes of highest quality bedrock in southern Ontario and the site is located within close proximity of the GTA. Due to the location of the identified endangered and threatened species, this site is no longer viable for aggregate extraction.

CONCLUSION

This is a no-win situation. Allowing for the replacement of these species would have provided a net overall benefit to the species while making available significant aggregate resources in a close to market location.

THE FIX:

SIGNIFICANT WOODLANDS

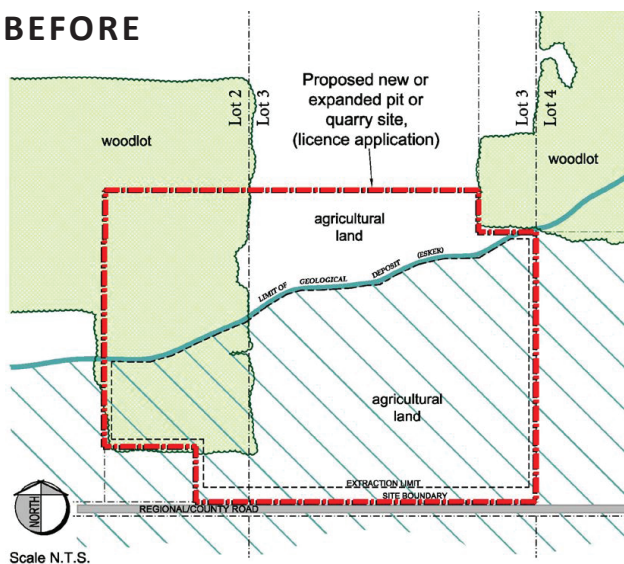
Within the Growth Plan NHS, Greenbelt NHS and ORMCP Linkage Area, Countryside Area and NEP Escarpment Area

2

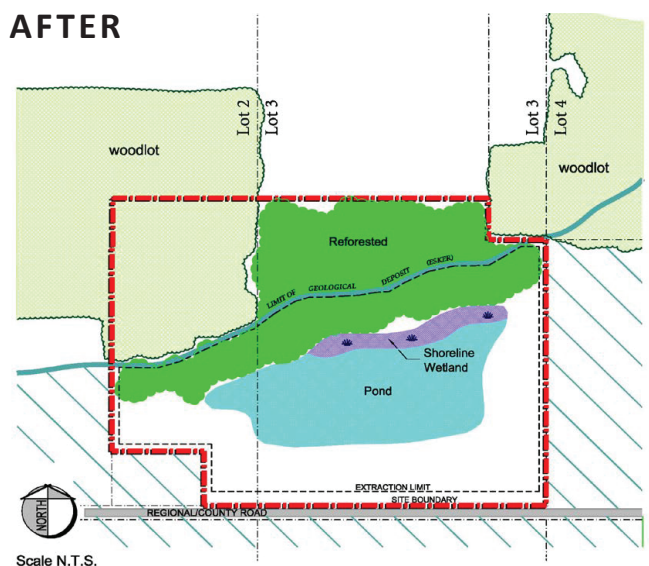
Permit extraction in significant woodlands that can be replaced and enhanced on the landscape subject to demonstration of 'no negative impact.'

- Woodlands are a renewable resource and aggregate resources are a non-renewable resource.
- Currently, woodlands can be deemed significant based on size alone without any consideration to quality or function of the woodland.
- The no negative impact test is a difficult test to achieve and will ensure high quality woodlands with important ecological functions are not extracted.
- The aggregate industry has demonstrated its ability to rehabilitate to woodland conditions and to expand and enhance significant woodlands.

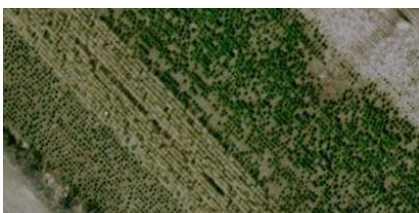
BEFORE



AFTER



Example of what has been called a significant woodland and sterilized access to the highest quality aggregate in Southern Ontario. This is not effective resource management.



THE FIX:

PROVINCIAL SIGNIFICANT WETLANDS

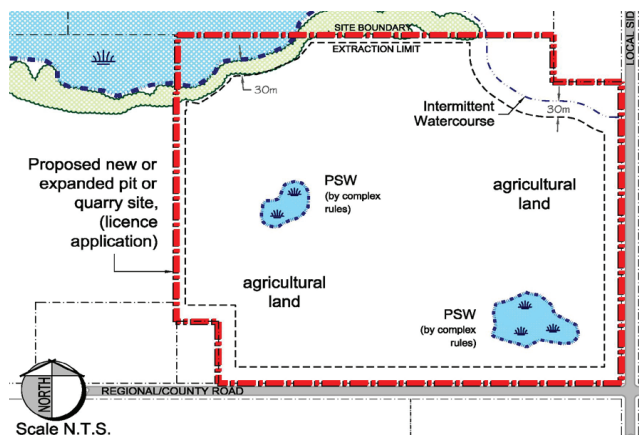
Within the Greater Golden Horseshoe

3

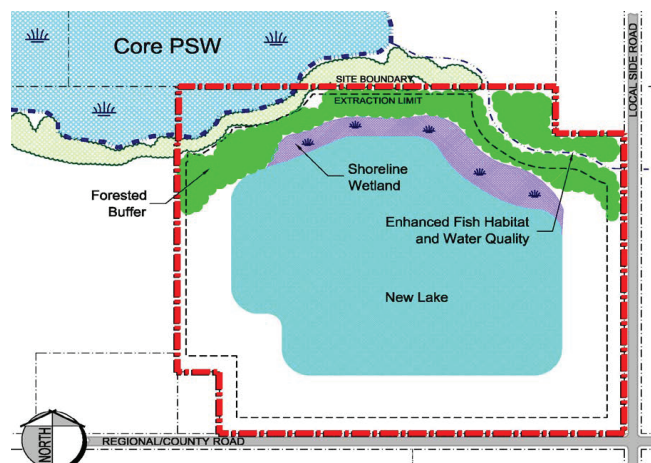
Permit extraction in small Provincially Significant Wetlands that have limited ecological function or contribution to the provincially significant wetland complex.

- OSSGA is not requesting the ability to extract important wetlands features.
- Currently, wetlands as small as 0.02 acres are being classified as Provincially Significant Wetlands due to their proximity to other important wetlands (e.g. within 750m). Some of these wetlands are dry the majority of the year and extend into cleared agricultural areas.
- Permit extraction of low quality provincially significant wetlands (less than 2.5 acres) subject to replacement and enhancement.
- The aggregate industry is currently one of the largest creators of new wetlands in the Province and some of these wetlands have already been designated as Provincially Significant Wetlands by the Province.

BEFORE



AFTER

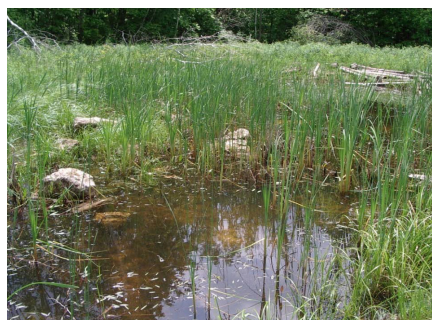


WETLAND CREATION

BEFORE



AFTER



THE FIX:

BELOW WATER EXTRACTION AND OTHER NATURAL HERITAGE FEATURES

4

Permit extraction below water within the ORMCP Linkage Area. Permit extraction within natural heritage and hydrologic features subject to the provisions of the Provincial Policy Statement within ORMCP and NEP.

BELOW WATER EXTRACTION IN THE LINKAGE AREA

- The ORMCP prohibits extraction below the watertable within the Linkage Area.
- In the ORMCP, sand and gravel pits can extract below the water table with limited to no off-site impacts (e.g. no pumping of water is required) and rehabilitation can enhance the linkage function of the site.
- There are some significant aggregate reserves below the water table within the linkage area that are being sterilized without a technical or scientific basis.

EXTRACTION IN OTHER NATURAL HERITAGE FEATURES

- The ORMCP prohibits extraction within all wetlands (not just PSWs), fish habitat, ANSIs, significant valleylands, significant woodlands, significant wildlife habitat, sand barrens, savannahs, tallgrass prairies, permanent and intermittent streams, kettle lakes, seepage areas and springs.
- The NEP prohibits extraction within all wetlands (not just PSWs), fish habitat, ANSIs, significant valleylands, significant woodlands, significant wildlife habitat, permanent and intermittent streams, lakes, seepage areas and springs.
- This is a different policy approach than the Greenbelt Plan and Growth Plan and there is no technical basis to include a more restrictive approach.
- Extraction should be allowed to be considered in natural heritage and hydrologic features subject to meeting the stringent natural heritage and water resources policies of the PPS. These policies are difficult to achieve, already favour the protection of the environment and only permit minor removals.
- Aggregate extraction is an interim use and rehabilitation has proven that replacement and enhancement of these features can serve to significantly improve the natural environment while also allowing extraction of a non-renewable resource to occur.

THE FIX:

ORMCP NATURAL CORE AREA

5

Allow for consideration of extraction within the ORMCP Core Area Subject to Stringent Rehabilitation Requirements and Protection of Important Natural Features.

- In 2002, the Province introduced a policy to prohibit extraction within the ORMCP Natural Core Area. It was acknowledged that the Natural Core Area includes areas of open fields and there was a policy added to the ORMCP to review this policy prohibition as part of the Plan review due to the importance of the aggregate resource. The 2002 ORMCP included the following policy in the implementation section:

"A 10 year review may also include an examination of the Plan's policies on mineral aggregate extraction in Natural Core Areas, recognizing that mineral aggregates are a non-renewable resource that are particularly desirable this close to markets. The review may consider in particular whether to change the policies of this Plan to permit new mineral aggregate operations and wayside pits to be established and existing ones to expand in Natural Core Areas, where the ecological integrity of those Areas can be maintained or improved".

- In 2017 the Province deleted this policy. The Province did not complete the review and provided no rationale for maintaining the prohibition.
- Based on stringent rehabilitation requirements, sites that have limited ecological function in the Natural Core Area should be permitted for aggregate extraction provided the site is rehabilitated to enhance the ORMCP Natural Core Area.



"Natural Core Area designation within the Township of Uxbridge"

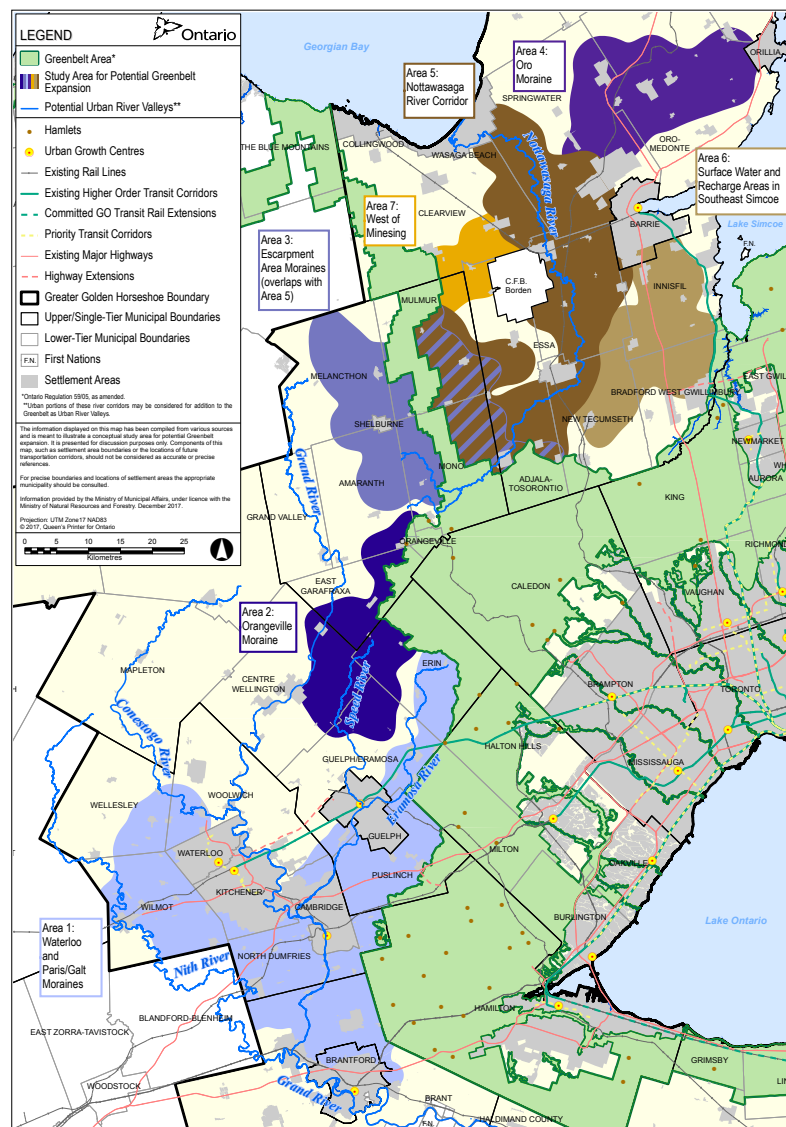
THE FIX:

EXPANDING THE GREENBELT

6

The Province should suspend any further study to expand the Greenbelt Plan.

- In 2017 the Province announced that it was proposing to study a potential expansion to the Greenbelt within 7 geographic areas.
- This announcement was strictly a political decision and additional Provincial Plans are not required to protect these areas.
- These areas are already subject to the Growth Plan and the Provincial Policy Statement. A third Provincial Plan applying to the same geographic area is not required.



OSSGA is a not-for-profit industry 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 approximately 164 million tonnes of aggregate consumed 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.

WHERE CAN I GET MORE INFORMATION?

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