

Judith Grant
Federation of Tiny Township Shoreline Associations
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November 4, 2019

BY EMAIL to aggregates@ontario.ca

Andrew MacDonald
Natural Resources Conservation Policy Branch
Ministry of Natural Resources and Forestry
300 Water Street
Peterborough, ON
K9J 8M5

Dear Mr. MacDonald:

RE: ERO NOTICE #019-0556 – PROPOSED AMENDMENTS TO THE *AGGREGATE RESOURCES ACT*

The Federation of Tiny Township Shoreline Associations is comprised of 20 associations scattered along Tiny Township's 72 kilometres of shore (1,825 households). Our members are keenly interested in environmental issues. In 2009, we contributed to the broad community opposition to Dump Site 41 where the County of Simcoe intended to place a garbage dump directly over the Alliston aquifer complex. Recently we have worked with inland groups to oppose the extension of the Teedon Pit (owned by CRH Group Canada Inc) in the Township's first concession, into French's Hill out of concern for the impact of removing the living filtration layer of soil, vegetation, sand, gravel and clay that makes the water in the Alliston aquifer complex so extraordinarily pure.

We have read and considered the comments regarding the proposed changes to the ARA submitted by Gravel Watch Ontario, the Canadian Environmental Law Association and the Simcoe County Greenbelt Coalition. We share their concerns about the lack of detail in the proposed changes, the evident support of the aggregate industry and disregard for safeguards for the environment in the current Aggregate Resources Act. We are appalled by the failure to observe due process in the introduction of Bill 132 before the public comment period for the proposed amendments to the ARA has passed. We too suspect that there is no intention to consider public input before legislative changes are drafted.

We think this provincial government would do well to consider its rural base. Simcoe North has been Conservative for many years. However, ill-advised moves by the

current provincial government are whittling away that support. Moves like those implied in the proposed amendments would have a further negative impact.

We wish to make the following specific comments about the Proposed Amendments. We are deeply concerned that there is a lack of specifics in phrases like "simpler process," "more flexibility for regulations to permit self-filing," "some regulatory changes," "allowing operators to self-file changes to existing site plans for some routine activities," "allowing some low-risk activities to occur without a licence," and "streamlining compliance reporting requirements."

Our area, Tiny Township in the County of Simcoe, depends on private and township wells for drinking water. We think the notion of a "more robust application process for existing operators that want to expand to extract aggregate within the water table" does not go far enough. In an area like ours, it is essential that extraction not be allowed below the water table and in areas that play a significant role in water quality and quantity, no extraction should be allowed.

Given that Ontario municipalities are responsible for land use planning and for ensuring that residents have clean drinking water, it is appropriate that they manage where and how aggregate extraction occurs in their jurisdiction. It is NOT appropriate to take away this power.

We disagree with the removal of the power of the Local Planning Appeal Tribunal and the Minister to require agreements between aggregate producers and municipalities regarding aggregate haulage when making a decision about issuing or refusing a license.

We would like to see a more robust application process for a Permit to Take Water for the washing of gravel, more frequent reviews of existing aggregate operations, enhanced reporting on aggregate rehabilitation, and a review of inactive pit licenses to ensure that they meet current standards prior to the commencement of operation.

We trust that these comments will be given due consideration.

Yours truly,

FoTTSA

Judith Grant, Past President and current Director