

May 14, 2020

Sent by email to: aggregates@ontario.ca

Ministry of Natural Resources and Forestry
Natural Resources Conservation Policy Branch
Resource Development Section
300 Water Street
Peterborough, ON
K9J 8M5
Canada

Dear Minister:

RE: Proposed Amendments to the Ontario Regulation 244/97 and the Aggregate Resources of Ontario Provincial Standards under the Aggregate Resources Act – Environmental Registry Notice #019-1303

The City of Guelph appreciates the opportunity to comment on the amendments to the Ontario Regulation 244/97 and the Aggregate Resources of Ontario Provincial Standards. The City has a keen interest in the efforts of the Province of Ontario and the Ontario Ministry of Natural Resources and Forestry (MNRF) to amend the Aggregate Resources Act (ARA). We are in receipt of the Environmental Registry of Ontario Notice 019-1303 – Proposal to amend Ontario Regulation 244/97 and the Aggregate Resources of Ontario Provincial Standards under the ARA. The City's interests are primarily with respect to protection of the environment and, in particular strengthening protection of water resources and preventing impacts to the City's water supply and Natural Heritage Systems associated with aggregate operations. Please find below our comments on the proposed amendments. We note that the proposal provides a number of "Proposed Approach" statements that require further definition and actual regulatory wording to be properly evaluated and therefore these comments may be subject to further detail or clarification as more information is provided by the Province.

Background

While the City currently has no active extraction operation within its boundaries, substantial aggregate reserves are located in adjacent municipalities surrounding Guelph and a number of existing licenced aggregate facilities currently operate on lands near to the City boundaries. No doubt, lands in the vicinity of Guelph will be the subject of future licence applications. Like all urban areas, the City relies upon aggregate resources for road building and construction projects. On the other hand, aggregate operations in close proximity to City residents can pose potentially significant impacts. For example, periodically, the City receives complaints from local residents with respect to concerns about blasting and noise impacts from a nearby quarry operation.

Protecting Our Drinking Water Supply: Guelph's Dolime Experience

We note that the proposal provides an introductory statement as follows: "While Ontario

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requires a continued supply of aggregate resources, it is equally important to recognize and manage the impact excavation operations can have on the natural environment and on the communities that surround them”. This statement is of crucial importance to the City in its capacity to ensure that existing and future aggregate extraction operations do not pose unacceptable risk to the aquifer the City uses for its drinking water. Guelph residents are reliant upon this aquifer as their sole source of safe drinking water. Residents in the adjacent Townships, also rely on the bedrock aquifer for their water supply.

The City has been involved in a longstanding dispute with an aggregate operator located in an adjacent township and the provincial Ministries of the Environment, Conservation and Parks (MECP) and Natural Resources and Forestry (MNRF) regarding the operation of a bedrock quarry (Dolime Quarry) and the protection of the City municipal water supply. The quarry sits adjacent to one of the City’s significant municipal well fields and quarry dewatering has already interfered with the water supply capacity of the City’s wells. The ARA licence for the quarry allows excavation of an aquitard confining layer that protects the City’s water supply aquifer from surface contaminants. The City is concerned that this excavation will threaten the City’s water supply when the quarry shuts down, the quarry floods and surface water flows into the City’s water supply aquifer thereby impacting the water quality of our existing drinking water sources.

The Dolime Quarry is a below-water table quarry operation and requires on-going water taking which is discharged to the nearby Speed River. The quarry is the largest private water-taker in the vicinity of the City of Guelph and dewateres 11,000,000 Liters of water each day as part of its dewatering operations. For comparison, the City’s average water demand is approximately 47,000,000 L/day. Eight municipal supply wells are located within two kilometers of the quarry property. The water taking from the quarry is derived from the same bedrock aquifer that the City uses for its municipal water supply. Quarry water taking, therefore, is in competition with the City’s drinking water supply wells for limited groundwater resources. The water taking of the quarry reduces the water quantity that is available for the municipal water supply.

The City has been engaged in this dispute since 2007. The City has appealed the MECP Permit to Take Water for the quarry and has been in mediation on the appeal since 2014. Recently, the quarry owner and the City have reached a tentative proposal to address the City’s water quality and water quantity concerns. The proposal would close the quarry, bring the quarry into the City and allow the City to take control of the quarry’s water supply. This innovative and unique approach is a reflection of the difficulties associated with addressing impacts of the quarry to water resources.

Protecting Our Drinking Water Supply: Guelph’s Threats to Water Quantity

Under the Province’s Clean Water Act (CWA), the City of Guelph has completed a Tier 3 Water Budget and Local Area Risk Assessment. The study has found that Guelph’s water supply is at significant risk of not being able to meet the needs of its future population as prescribed the Province’s Places to Grow policies. The Province has defined a Wellhead Protection Area for water quantity (WHPA-Q) wherein water quantity is to be protected under the CWA. The greatest non-municipal threat to the City’s water quantity in the WHPA-Q, as defined by the City’s Tier 3 Water

Budget project, is the quarry dewatering noted above. Risk management measures to eliminate the dewatering of the quarry, if implemented, were shown to restore the water quantity to the municipal supply and reduce the significant water quantity risk. However, under the current regulatory framework, the ARA licence and particularly the rehabilitation plan for the quarry are difficult to change.

Protecting Our Drinking Water Supply: New Proposed Quarry Operations

Recently (June 25, 2019), there was an ERO Notice 019-0240 for another quarry operation in proximity to the City of Guelph. The Notice was for a Permit to Take Water for an existing ARA licence. The ARA site licence was issued in 1993 and allows excavation of the same bedrock formations as for the Dolime Quarry. The City's concerns mirror concerns presented for the Dolime Quarry. Dewatering operations are proposed to be significant (up to 21,500,000 Liters per day). The depth of excavation allowed in the site licence will penetrate the aquitard and dewatering for the excavation will draw water from the same aquifers as used by two of the City's water supply wells located approximately 1.8 km to the north and to the east, respectively. The City is concerned that the existing ARA site licence will result in excavation into the aquitard, resulting in risks to the City's water supply and the ARA, as it is currently enacted, does not provide an amenable process to change the site licence to reflect the potential environmental impacts and protection requirements for the City's water supply.

The City's Interest in Positive Changes for the ARA

The following comments on the proposed amendment to the ARA draw on the experience and expertise of City's Water Services staff, and the City's historical experience dealing with issues arising from aggregate operations.

Given the potential for existing and future aggregate operations to impact the security of its drinking water supply and to affect City residents through other potential impacts, the comments below are provided to support the best way to achieve a robust and balanced framework of laws, regulations and policies for environmentally sound management of the Province's aggregate resources.

It is on this basis that the City of Guelph provides the following comments as they relate to the Environmental Registry of Ontario Notice 019-1303 – Proposal to amend Ontario Regulation 244/97 and the Aggregate Resources of Ontario Provincial Standards under the Aggregate Resources Act:

Part 1.1.1 Water Report – Monitoring Period to Determine the Water Table Elevation

Comment 1: We were pleased to see a monitoring period to determine water table elevation, however, we expected to see a time period associated with the monitoring period that would allow for an assessment of seasonal fluctuations in the water table elevation (i.e., a “wet” year versus a “dry” year). For example, the monitoring period could be a minimum of two years for Licence/Permit applications above the water table with suitable monitoring locations for the entire

footprint of the proposed pit/quarry and a minimum of three years over the entire footprint of the proposed quarry for applications below the water table. We also are pleased that the water table elevations will be determined by a Qualified Person (i.e. Professional Geoscientist or an exempt Professional Engineer) using monitoring appropriate for the hydrogeological setting and size of each site. The use of data from adjacent sites would only be used to supplement current and reliable data from the subject site.

Part 1.1.1 Water Report – Technical Requirements

The “Water Report” or Hydrogeological Report, in the Provincial Standards is defined as a Level 1 report and a Level 2 report. The Level 2 report is required where the Level 1 report determines there is the potential for adverse effects of the operation on groundwater and surface water resources and their uses. Details for these reports are not well described in the Provincial Standards. For example, the Hydrogeological Report is to include items such as water wells, groundwater aquifers, water budget, impact assessment, mitigation measures and monitoring plans, without much information on the level of detail or technical content for the report. The MNRF, in 2014 as part of the Aggregate Resources Act Review initiated technical working groups with the intent to improve the technical requirements of the Water Reports. The Water Technical Group, comprised of surface and groundwater technical experts from provincial ministries, conservation authorities and municipalities, produced a Discussion Paper that provided advice to the Province on changes to the technical assessment requirements for ARA applications including impact assessments.

Comment 2: The City would like to see the Province review and apply the results of the Discussion Paper since it provides “the advice and key considerations recommended by the members of the Water Technical Group for consideration in the development of future policy proposals under the *Aggregate Resources Act* framework, as they related to the protection of water resources”. The Discussion Paper is attached to the City’s response for the ERO posting. We suggest that the Province consider improving the technical requirements for the Water Report so as to clearly define the level of detail and assessment of impacts particularly with respect to municipal drinking water sources, water budgets and cumulative impacts. The best way to achieve environmental protection and protection of drinking water supply is to monitor the hydrogeology system on all site Licences/Permits and to monitor/confirm the prediction of impacts. Sharing of monitoring data with municipalities would achieve transparency and a balanced approach to monitoring municipal drinking water supply.

Part 1.1.1 Water Report – Integration with Permits to Take Water

Comment 3: The City expected to see the preparation of the Water Report for an aggregate site below the water table integrated with the PTTW application. These two technical studies are essentially considering some of the same information however, the PTTW application is typically a more detailed and quantitative assessment of the potential impacts of the aggregate operations on the hydrogeological system resulting from the taking of water. For example, the PTTW application would assess the radius of influence of the dewatering operation for the full limit of extraction and this information could be used as one basis for the assessment of environmental impacts. Particularly for an aggregate quarry operation where the radius of influence for dewatering may

extend to 500 m or more, the area of concern could have a technical basis rather than a pre-assigned limit.

It would be more useful for analysis if the potential radius of influence of the water taking is used in the Natural Environment Report rather than a limit of within 120 m of the site. The City also expects that notification and consultation to the full limit of potential impacts (see Part 1.3.2 – 120 m threshold) to be based on technical details and not on a predetermined limit.

Part 1.1.1 Water Report – Source Protection Plans

The City is supportive of including Source Protection Plan information in the Water Report however; the proposed amendments need to include specific details as to how the aggregate operations may impact Wellhead Protection Areas (WHPA).

Comment 4: The Water Report would be more robust if consultation(s) with the municipal Risk Management Official (RMO) was a requirement of an application in a WHPA to determine the relevant Source Protection Plan policies that may apply to the site. Advice from the Risk Management Official at the application stage would reduce the number of comments for each application if the advice had already been considered in the application. Under the Clean Water Act Director's Technical Rules, as provided by the Province, the activities associated with aggregate operations may be considered "transport pathways" and may increase vulnerability scores for the aggregate property and potentially adjacent lands.

Comment 5: We expected to see the Province define how changes to the vulnerability scores are to be reflected in the Site Plans for proposed new and existing aggregate operations.

In addition, the City has particular concerns about proposed below water table aggregate sites in the WHPA-Q that is used to designate drinking water threats for water quantity. A Permit to Take Water (PTTW) for a below water table site in a WHPA-Q would be a significant drinking water threat. For the City of Guelph WHPA-Q, which has a significant risk designation, the PTTW for this activity would be classified as a Significant Drinking Water Threat (SDWT).

Comment 6: -It is extremely important that the Water Report outlines how the aggregate operation in a WHPA-Q would be managed so that it would cease to be or never become a SDWT for water quantity as this is the purpose of the Clean Water Act and the objective of the Source Protection Plan.

Part 1.1.1 Water Report – Application to Existing Sites

The amendments propose new requirements for the Water Report, particularly with respect to Source Protection requirements, however, existing site Licences/Permits do not have the same requirements. Existing site Licences/Permits are often decades old and do not consider Source Protection requirements and therefore need to be updated to protect drinking water sources when compared to new applications. It is expected that the Province would wish to have all aggregate Licences/Permits assessed to the same level of environmental protection.

Comment 7: Consider applying the same requirements for existing site Licences/Permits.

Part 1.1.1 Water Report – Inability to Request Studies for Existing Site Licences/Permits

Current regulations do not enable MNRF to request studies or investigations of existing site Licences/Permits. Therefore, MNRF is unable to address deficiencies in existing site Licences/Permits with respect to changing conditions at or around the site. For example, new Source Protection Plans and potential threat activities cannot be addressed for existing sites. Investigations to determine the extent to which existing sites may be excavating into municipal drinking water aquifers cannot be requested of the site owners. As a result, existing sites may operate under out-dated Licences/Permits and not be protective of the natural environment, particularly drinking water sources.

Comment 8: Consider changes to the regulations to add requirements for studies upon request as per the Ontario Water Resources Act Section 34.1(5) for PTTW.

Part 1.1.1 Water Report – Site Licences/Permits and Expiry Dates

Currently, existing site Licences/Permits do not expire and there are no opportunities to review or update the Licence/Permit to reflect changing environmental or regulatory conditions. Some Licences/Permits are in excess of 45 years old (Dolime Quarry licence first issued in the early 1970's) and do not reflect current best practices for environmental management/protection.

Comment 9: An enhancement to the regulation would be to allow for periodic reviews and renewals of the site Licences/Permits. Renewal periods could be similar to PTTW where renewal periods are up to 10 years. This renewal period would allow the Province to review the Licences/Permits and update them, if required, in light of any potential changes to the site conditions, to the land uses around the aggregate operations or for any new regulatory requirements. The renewal period would also provide the opportunity for the Province to re-visit the rehabilitation plans for the aggregate operations to determine if it is still appropriate for the existing conditions, whether the operator is achieving the rehabilitation requirements as planned and to update the plan, if necessary.

Part 1.1.1 Water Report – Water Budget Assessments

The proposal indicates that a water budget may be required. For the area surrounding Guelph, Tier 3 Water Budget studies have been completed as part of the City's Source Protection Program.

Comment 10: It would be beneficial that these studies be reviewed for any new applications within the WHPA-Q. Where the application is for a below water table operation, the water budget studies would support protection of a municipal drinking water supply. In particular, within the WHPA-Q, the water budget studies would allow for evaluation of the potential impacts of site water taking on nearby municipal drinking water sources. The City would expect that impacts that may reduce the amount of water quantity that may be available to municipal drinking water sources would not be permitted.

Comment 11: The water budget assessments suggested in the amendments would be most helpful if conducted for the full extent of the proposed excavations and use industry-standard modelling tools as best management practices to ensure the water budget assessments are comprehensive and reliable.

Part 1.1.3 Natural Environment Report – Protection of Water Quality and Quantity

In consideration of the Natural Environment Report (NER) and aligning the report with the Provincial Policy Statement, the Province is reminded that there are some competing interests in the development of aggregate resource and that as per the requirements of the PPS, “Planning authorities shall protect, improve or restore the *quality and quantity of water...*”.

Comment 12: We expect that the NER would consider, not only the impacts of the aggregate operations on the natural environment, but also the cumulative effects of the impacts. For example, an impact of aggregate operations on surface waters may also have cumulative effects on municipal drinking water sources and may limit both existing and future water supply for municipal sources.

We also note that the proposed amendment in respect of the NER states “the report must determine any potential negative impacts on the features or their ecological functions and propose any necessary measures to prevent, mitigate or remediate the negative impacts”. As defined in the PPS, negative impacts, specifically address “degradation to the *quality and quantity of water, sensitive surface water features and sensitive ground water features, and their related hydrologic functions, due to single, multiple or successive development. Negative impacts* should be assessed through environmental studies including hydrogeological or water quality impact assessments, in accordance with provincial standards”.

Comment 13: We would expect the Province to ensure that these aspects of the PPS are incorporated into the NER and the regulation and Provincial Standards are updated accordingly.

Part 1.1.5 Blast Design Report

The proposed amendments require a Blast Design Report for all new quarry application on private lands and Crown lands where there is a sensitive receptor within 500 m of the site.

Comment 14: The City would suggest that existing quarry sites update their Blast Design Report to the same standards particularly with respect to the sensitive receptors within 500 m of the site. For transparency, it would be helpful if all Blast Design Reports be made available to the public.

Part 1.1.6 Summary Statement

Under the proposed amendments, the requirements for the Summary Report are for new pit or quarry applications and are to include planning and land use considerations and source protection considerations on the Site Plan for the Licence/Permit.

Comment 15: The City would recommend that the Province extend the same requirements to existing sites and that Site Plans for existing aggregate operation be updated with the same

information. In addition, the Summary Statement should clearly define any implications of the aggregate operations with respect to Source Protection Plans and significant drinking water threats.

Part 1.1.7 Application Requirements for Extraction from Land Under Water

The City is supportive of the approach proposed for excavation of aggregate materials from the bed of a lake or river. However, we would expect that the details of the custom plan would be explained in more detail.

Comment 16: Given the potential for environmental impacts for these types of sites, it is important that the custom plan be more comprehensive than plans currently used for other aggregate operations. Furthermore, these custom plans may require more detailed public consultation, especially from municipalities who rely on groundwater for their drinking water supply, than other plans.

Part 1.2: Site Plan and Licence/Permit Conditions

The City is pleased to see that the amendments have proposed changes to the Site Plans and Licence/Permit conditions to improve flexibility and modernization on changes to Site Plans and to update the list of qualified professional to prepare Site Plans. However, we are concerned that these changes appear to be for small changes in Site Plans such for fencing and trees and stumps and importation of excess soil as well as Site Plan submission methods. A more balanced approach would also include updates to underlying technical studies (Water Report, Natural Environment Report, etc.) which have not been amended since the initial issuance of the Licence/Permits.

Comment 17: Flexibility and modernization could include a broader perspective to assess whether the Site Plans and conditions are still appropriate for the site setting, whether changes are required to address changes to the regulatory setting (i.e. Source Protection Plans), whether the technical studies in support of the Site Plan and Licence/Permit are still valid, and whether the potential sensitive receptors in the area of the site have changed. In this manner, MNRF can ensure that the Site Plans and Licence/Permit conditions are continually updated and fully protective of water resources and the natural environment and align with current regulations.

Part 1.2.4 Prescribed License and Permit Conditions (New Sites) – Conditions Related to Other Approvals

MNRF is proposing to remove conditions from new Licences/Permits that relate to certain approvals from other ministries such as Permits to Take Water.

Comment 18: The City would strongly recommend an opposite approach where some approvals such as a PTTW's are more fully integrated with a site Licence/Permit. In this manner, PTTW that are reviewed, renewed and reflective of existing conditions could be added to the Licence/Permit conditions. As noted above, the PTTW is a more quantitative assessment of potential impacts related to water and would be extremely useful as an assessment tool in the Water Report. The two technical studies could both be reflected in the Licence/Permit conditions.

Part 1.3 Notification and Consultation Requirements

The City supports extensions of the notification period to 60 days to allow more time for agencies and interested parties to review and comment on the application.

Comments 19: It is extremely important that municipalities be a mandatory agency in the notification process and this includes active consultation between the applicant and the local municipalities for any proposed site within the jurisdiction of the municipality. It is also important that notification be extended to include municipal well owners for Wellhead Protection Areas and Intake Protection Zones (IPZs) in which the new site is proposed and should not be limited to 150 m for a proposed pit and 500 m for a proposed quarry. The municipality's interest may include (but not be limited to) protection of its municipal water supplies under the Clean Water Act and Source Protection Plans for the watershed.

Section 2, Part 2.1 Excavation from Private Land or Land Owned by a Farm Operation

The ministry is proposing that persons or farm operations on private land that meet specific criteria would not need to obtain a licence from the ministry if they follow rules set out in the regulations. The proposal sets out a number of detailed conditions that must be met in order to qualify for this exemption.

Comment 20: The City's concerns with this proposal are primarily with respect to monitoring and enforcement of the activities since they may be implemented by private individuals without knowledge or experience in managing aggregate operations. There are also concerns about the oversight and enforcement of these types of aggregate operations. Further explanation is required as to how the Province would inspect the activities for compliance with the conditions of the proposal and to enforce non-compliance issues, if they occur.

Section 3, Part 3.1 Operating Requirements for All Sites (New and Existing)

All pits and quarries, regardless of date of issue, are required to be operated in accordance with a set of requirements described in the Provincial Standards (known as "Operational Standards"), unless a variance has been approved by the ministry. Operators are required to make note of any variances from the operational standards on their Site Plans. The amendments propose changes such as fencing, boundary delineation, tree and stump removal, entrance changes and scrap management. However, these are relatively minor changes and it is important that the operating requirements for all sites be updated to reflect current environmental regulations. For example, Part 1.1.1 Water Report proposes new requirements be added to the Water Report that summarizes how local source protection plans and policies are addressed.

Comment 21: The City would recommend that if the Provincial Standards are updated for new sites, it would be beneficial for existing sites to also be required to meet the same level of environmental protections. This same recommendation would apply for Part 3.2 Annual Compliance Reporting (including Part 3.2.2 Rehabilitation Reporting) and Part 3.3 Site Plan Amendments. Each time a new or existing site requests a change to the operating requirements, the compliance reporting or the Site Plan, the Province could use the opportunity to ensure compliance of the site with the most current Provincial standards and best management practices. We note that

“best management practices” are proposed for Part 3.1.2 Dust and Part 3.2.2 Rehabilitation Reporting but there is no information on how these best management plans will be incorporated in the License/Permit process. With continual updates of Licences/Permits, in this manner, aggregate operations will provide continuous improvements in environmental protection.

Part 3.1.3 Blasting

The City is in support of proposed changes associated with blasting operations particularly with respect to blast monitoring and control of fly rock.

Comment 22: The City would recommend, for transparency, that blast monitoring reports be made available to the public through online posting with contact information to address concerns/complaints with respect ground vibration and fly rock.

Part 3.2.2 Rehabilitation Reporting

The City is in support of the proposed changes for rehabilitation reporting.

Comment 23: To support the rehabilitation reporting, it is expected that additional details be added to the proposal to cross reference the rehabilitation requirements on Site Plans to the Provincial Standards and any discrepancies be used to update the Site Plans to the current Standards. Often, the rehabilitation phasing could be made more precise and progressive rehabilitation plans could be updated to match the approach outlined in the Site Plans. In order to confirm the details in the compliance reporting, annual checks on the site could be completed to confirm the rehabilitation reporting to final rehabilitation through progressive rehabilitation as outlined in the Site Plan.

Part 3.3 Site Plan Amendments

Comment 24: As noted several times in these comments, updating Site Plans on a regular basis through a renewal process would fulfil the intent of these amendments to further protect the environment. It is expected that potential sensitive receptors will change over the life of the aggregate operations but there is no current process to update and continuously improve the operation of the aggregate operations to reflect these changing conditions.

Part 3.3.3 Amendment to Expand an Existing Site Below the Water Table

Comment 25: It is expected that the proposed approach for an amendment application to expand an existing pit or quarry on private land below the water table be the same as for a new site application. It is expected that below water table extraction will create new or different issues and concerns that may not have been considered in the initial site application. As noted above, environmental impact assessments either in the Water Report or the Natural Environment Report be governed by the set of conditions imposed by the below water table extraction and not be based on previous assessments and past technical reports. As noted above, the Water Report could be integrated with the PTTW process to ensure that the more quantitative aspects of the hydrogeological assessment from the PTTW are incorporated into the impact assessment of the Water Report and, where necessary, the Natural Environment Report. Notification requirements on a new site application could be based on the expected zone of impacts as determined in the technical reports.

Part 3.3.4 Self-Filing of Site Plan Amendments

In developing the proposed approach for self-filing of Site Plan amendments, consideration with how compliance with Source Protection Plans will be managed would enhance the proposed amendments. Some of the proposed Site Plan amendments eligible for self-filing may trigger compliance issues for local Source Protection Plans. Portable processing equipment, scrap storage areas and portable concrete or asphalt plants may need to comply with local Source Protection Plans, in particular where an Environmental Compliance Approval has been issued (i.e., the Source Protection Plan may require an ECA to contain conditions that are protective of drinking water sources). Similarly the importation of aggregates for blending and the use of recycled materials may raise concerns about contaminated soil and water quality impacts in Wellhead Protection Areas.

Comment 26: Engaging local Risk Management Officials as part of the notification process would allow the RMO to advise the applicant of any potential constraints or concerns associated with the Clean Water Act and compliance with the local Source Protection Plan. In addition, a similar consultation with the MECP to determine the process for compliance with local Source Protection Plan in the permitting of intermittent or temporary activities for aggregate operations would enhance the proposed amendments.

Section 4 – When Changes are Proposed to Come into Effect

MNRF has proposed a general timeframe as to when the proposed changes would come into effect and some changes may not be in effect for a few years. The City recognizes that the change takes time and there are more details to be work out with respect to the proposed changes. However, the Aggregate Resources Act review has been ongoing since 2012 and it is now time, after much discussion and consultation, to implement the propose changes to modernize the ARA with improved environmental protections.

Comment 27: The City would encourage the Province to move forward with these proposed changes as soon as possible. Clear direction must be provided by the province so that all stakeholders understand how the changes that are proposed will be phased in and associated timelines for operationalizing all new measures.

We thank you for the opportunity to provide our comments to you. We look forward to further specific details related to Environmental Registry of Ontario Notice 019-1303 – Proposal to amend Ontario Regulation 244/97 and the Aggregate Resources of Ontario Provincial Standards under the Aggregate Resources Act. We trust our comments have assisted you in amending the ARA to ensure that strong protection for the environment is maintained. Should you have any questions regarding our comments, please contact the City. We would be pleased to meet with MNRF to more fully explain our comments on these proposed changes to the ARA.

Sincerely,
Guelph Water Services