

February 13, 2019

Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
777 Bay Street
23rd Floor, Suite 2304
Toronto, ON M5G 2E5

Re: Proposed Changes to the Greater Golden Horseshoe Growth Plan – ERO# 013-4504

Dear Sir or Madam,

CBM Aggregates, a division of Votorantim Cimentos North America, is a member of the Ontario, Stone, Sand & Gravel Association (OSSGA) and supports OSSGA's comments and recommended revisions to the Growth Plan as outlined in their letter dated February 4, 2019.

The Growth Plan and proposed revisions to the plan are intended to increase housing supply and economic growth in the GGH, but have failed to support the protection of the very building blocks needed to achieve this growth in housing supply, the aggregates used in concrete, asphalt and as base for homes and roads. The growth envisioned by this plan will require 2.5 billion tonnes of aggregate in the GGH over the next 25 years, of which 1.5 billion tonnes is needed in the GTA. Despite this, the Growth Plan and proposed changes not only fail to protect the aggregate resources for future development but will, in fact, further sterilize access to important aggregate areas. There is already a proven gap between the consumption rate of aggregates and the rate of licensing new supply in key market areas such as the GTA. For example, in 1992 the GTA imported 40% of its aggregate needs and in 2017, only 25yrs later, this increased to 72%.

The current policy framework is not working. Approvals for new mineral aggregate operations in Southern Ontario are taking up to 10 years to complete the process. There are too many overlapping policies and inconsistent approaches between the Provincial Plans, Regional Official Plans, Local Official Plans and Conservation Authority policies regarding the management of this essential non-renewable resource.

One of the proposed revisions to the Growth Plan will exacerbate this problem. The proposed amendment to the Growth Plan includes the following new policy (4.2.2.4):

Provincial mapping of the Natural Heritage System for the Growth Plan does not apply until it has been implemented in the applicable upper- or single-tier official plan. Until that time, the policies in this Plan that refer to the Natural Heritage System for the Growth Plan will apply outside settlement areas to the natural heritage systems identified in official plans that were approved and in effect as of July 1, 2017.

This policy essentially provides municipalities the ability to use existing and future Natural Heritage System mapping to prohibit new mineral aggregate operations and this will undermine the provincial interest in protecting the resource and ensuring it is available close to market. Access to aggregate deposits often become

political during municipal election campaigns and this will only embolden municipalities to turn away new applications within their borders, thinking that supply can come from somewhere else.

The problem is that regional and local Official Plans include locally significant natural heritage features within their NHS and the prohibitions for new mineral aggregate operations as outlined in 4.2.8.2 of the Growth Plan should not apply to these areas. For example:

- Almost all new aggregate sites in the GGH contain habitat of endangered and threatened species as a result of the 171 species listed by the Province and how habitat is defined, which results in large areas being mapped as habitat or potential habitat. Automatically prohibiting extraction in these areas undermines the Province's Endangered Species Act which allows for development subject to providing an overall net benefit to the species.
- Woodlands as small as 0.5 ha are deemed significant woodlands and some woodlands that have limited to no ecological function are deemed significant based on the size of the woodland alone. Again, these types of features should not prohibit access to the highest quality aggregate resources in the GGH, especially when rehabilitation efforts of the aggregate industry allow for compensation in the form of tree planting and wetland habitat creation.

Over the past 2 years our company has been assembling approximately 80ha of land within a high quality aggregate deposit. This site was mapped as part of the Provincial Natural Heritage System and portion of the site is also mapped as part of the regional and local Natural Heritage System. Without changes to Policy 4.2.8.2 considerable investment can be put at risk. A site that is environmentally responsible and can easily be designed to provide an overall net gain to the natural environment could be sterilized.

To ensure the protection and future availability of mineral aggregate resources, OSSGA has provided suggested policy revisions to Section 4.2.8 of the Growth Plan. Without changes to Section 4.2.8 the Province will not be open for business in a manner which promotes a healthy economy and natural environment. The recommended policy changes will ensure extraction results in an overall net benefit/gain to the natural environment while restoring confidence in the aggregate industry's ability to invest in the application process to make this resource available.

Yours truly,



David Hanratty, P. Geo.
Director of Land & Resource, North America

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