April 6, 2022 SENT via ONLINE Submission

Laura Blease

Land Use Policy, Environmental Policy Branch

40 St. Clair Ave West

10th floor

Toronto, ON M4V 1M2

**RE: Implementation Pause of Excess Soil Requirements in Effect January 1, 2022**

Dear Ms. Blease,

The Mount Pleasant Group (MPG) operates 10 active cemeteries within the GTA. Annually our properties currently provide eight to nine thousand interments every year and this number is on the rise.

Along with other large cemetery operators we are very concerned that O.Reg 406/19 was created with no consideration for our type of essential service and unique operational needs.

Ontario’s cemeteries are unique operations that are managed by a vast array of entities. These include municipalities, religious groups, volunteer boards, and not-for-profit and for-profit companies. Our industry is also unique in that typical (interment) operations produce minimal (3-4 m3) amounts of excess fill continuously and in perpetuity. At some point, the provisions of these new regulations will affect all cemetery operators in the province and will provide significant challenges for many in terms of administration, compliance and the cost of compliance.

MPG is requesting that you consider the unique operations of the bereavement industry as well as the implications that the Phase 2 requirements will have on cemetery operators (deemed an essential service) across the province. We strongly agree with the proposal to pause the implementation of some provisions for the Excess Soil (O. Reg 406/19: Onsite and Excess Soil Management) until January 1, 2023.

We appreciate your attention to these concerns and the opportunity to provide comment. Should have any questions regarding our comments please contact MPG’s Director of Property Management, Gary Linton at [glinton@mountpleasantgroup.com](mailto:glinton@mountpleasantgroup.com)

Sincerely,

Glenn McClary

C.E.O

Gary Linton

Director, Property Management