Key Points

HAPP Joint Submission in Response to
A Blueprint for Change: A Proposal to Modernize and Strengthen the Aggregate Resources Act Policy Framework

1. The Province needs to provide greater clarity on reconciling mineral aggregate extraction objectives with planning objectives such as the protection of natural environment, prime agricultural areas and the preservation of water resources.

2. Applications for new or expanded mineral aggregate operations should be required by the ARA, and by the Provincial Policy Statement (PPS) and Provincial plans, to demonstrate the need for additional aggregate.

3. Provincial land use plans need to be better integrated with legislation respecting aggregate resources (e.g., the ARA) to ensure timely rehabilitation of mined out sites and effective regulation of fill and site alteration activities.

4. Better coordination is needed between ARA requirements for new applications and Planning Act requirements (e.g., pre-consultation, study requirements, public and agency notices, public engagement, timelines, appeals). Municipal study requirements for Planning Act applications for new or expanded aggregate operations often exceed ARA requirements, as municipalities must address the broader public interest, including social and economic impacts.

5. The Blueprint proposes a number of changes enabling the MNRF to waive and/or amend requirements for less significant activities, such as notice requirements. Clear criteria should be set out to determine when this may occur.

6. Better coordination is needed among the various branches of MNRF involved in aggregate approvals.

7. The multiple layers of approval required for aggregate operations should be streamlined (e.g., Planning Act approvals, Conservation Authority approvals, Fisheries Act Authorization, etc.). The roles and responsibilities of the agencies involved need to be clarified.

8. The Province, through, the ARA, must establish more effective requirements to ensure the timely closure and rehabilitation of aggregate operations.
9. Municipalities, and other public agencies such as Conservation Authorities, should be included as parties to aggregate licences and site plans. A proposal for significant changes to a licence or site plan should be required to submit an application for approval and should not be approved without public consultation and the agreement of the relevant stakeholders.

10. Aggregate licence fees must be increased to reflect the true costs to municipalities and should be disbursed equitably among all of the municipalities impacted by the aggregate operation.

11. The Ministry should adopt a process similar to Halton Region’s Streamlined Mineral Aggregate Review Protocol, including the establishment of a Joint Agency Review Team (JART), to guide the review of applications for new or expanded aggregate extraction sites.

12. Licence applications should be required to address the financial, social and other impacts of aggregate hauling, including the impacts on municipalities other than the municipality in which the aggregate operation is located.