

To: Mayor and Council
From: Reform Gravel Mining Coalition (RGMC)
Re: Correcting Ontario Stone, Sand and Gravel Association (OSSGA) Misinformation
Date: March 21, 2022

The Reform Gravel Mining Coalition recently became aware of a letter sent to Municipalities across Ontario regarding our organization and activities. We are disappointed that an organization such as the Ontario Stone, Sand and Gravel Association would stoop to name calling and fear mongering and we want to take this opportunity to set the record straight.

The March 18, 2022 memo misrepresents the statements of the RGMC. See comparison below between OSSGA claims and RGMC statements (Table 1). The OSSGA also makes claims about aggregate supply and demand that are questionable as they are not based on publicly available authoritative information. The OSSGA also omits information which would provide the reader a more comprehensive understanding of the issue – for example the contribution of the cement industry to the climate crisis. These are also itemized below (Table 2).

A primary purpose of proposing a moratorium, a temporary pause, on new gravel mining approvals is to conduct an independent third-party study of aggregate reserves. This independent study is an urgent priority as there is a finite amount of gravel reserves in Ontario, and gravel is a vital resource which needs to be carefully managed.

OSSGA member James Dick Construction Ltd. is proud of their “300-year resource management plan” indicating that they “consider long-term planning essential for long-term growth — except that in its case the planning horizon stretches three centuries into the future.”¹ It is difficult to reconcile the recurring claims that Ontario is running out of gravel when members of the industry make such statements.

Concerns around gravel mining have been raised for decades. Citizens demand to be protected. Municipalities’ ability to manage this environmentally and socially intrusive industry are increasingly hampered and reduced. We understand that the industry is concerned. Change can be frightening. But we invite municipalities to support the resolution for a moratorium, a temporary pause, on all new gravel mining approvals in Ontario. Let’s stop making the situation worse by continuing to issue new approvals. It is time to chart a new path forward.

Please contact the Reform Gravel Mining Coalition at campaign@reformgravelmining.ca for more information

¹ <https://canada.constructconnect.com/dcn/news/economic/2019/09/aggregate-supplier-plans-300-years-ahead>

Table 1: Corrections to OSSGA Misinformation

OSSGA Claim	RGMC Statement
<i>The industry digs out 13 times more gravel every year than it uses</i>	The provincial government has authorized the gravel mining industry to extract thirteen times more gravel each year than is required to meet average annual consumption. ²
<i>The aggregate industry takes up to 4.6 billion litres of precious water every day.</i>	The provincial government has approved up to 4.6 billion litres of water for daily consumption by the gravel mining industry. ³
<i>The aggregate industry destroys 5,000 acres of land a year.</i>	Gravel mining consumes an average of 5,000 acres of land in Ontario each year. An average of 5,000 acres of land is licensed each year for gravel mining in Ontario. ⁴

Table 2: Gravel Mining in Ontario/ OSSGA Claims vs. Facts

OSSGA Claims	FACTS
It is estimated that the industry has roughly a 10-year supply of aggregate licensed to extract.	This statement is not supported by publicly available data. RGMC's review of NDMNRF (Ministry) data, and The Ontario Aggregate Resources Corporation (TOARC) annual reports does not provide evidence to support the assertion that there are only 10 years of close to market reserves. The OSSGA fact is based on "industry estimates". RGMC cites TOARC data ⁵ .
The Golder/MHBC Supply Demand Study estimated the "amount of 'high' quality reserves is approximately 1.47 billion tonnes"	The OSSGA fails to cite the Golder/MHBC Supply Demand Study reference to the "high degree of uncertainty with this estimate" and the study authors' warning that "the results should not be taken as a very realistic indication of what resource may actually be proven and made available from these licenced sites". ⁶ The reality is that no one knows the true state of aggregate reserves in Ontario.

² Total of maximum extraction limits from the Ministry of NDMNRF Aggregate License and Permit System (ALPS)

³ MOECP Permits To Take Water Database total of active permits issued for Pits and Quarries Dewatering and Aggregate Washing

⁴ <https://toarc.com/production-statistics/>

⁵ <https://toarc.com/production-statistics/>

⁶ Golder MHBC Supply and Demand Study Executive Summary 2016

OSSGA Claims	FACTS
Ontario will require nearly 4 billion tonnes of aggregate over the next 20 years to meet the needs of citizens and the additional 5.3 million people that will call Ontario home. That is estimated to be 192 million tonnes of aggregate per year.	<p>In the last 20 years average gravel consumption has decreased while the population of Ontario grew by 3 million people in that same period.</p> <ul style="list-style-type: none"> • The average annual consumption of gravel from 2001 – 2010 was 168 MT per year. • From 2011 – 2020 it was 157 MT / year.⁷ • Ontario's population increased from 12M to 15M an increase of (25%) in the last 20 years.
It currently takes an average of 10 years to apply for and receive a new license.	There is no publicly available data to support this claim. The application process for new gravel mining approvals has a two-year time limit on it. Additional delays are often a result of decisions and choices made by the applicants.
The aggregate industry is not a significant contributor of GHG emissions	The cement industry produces 8% of global carbon emissions, as a country it would be the third largest global emitter of CO ₂ . Aggregate is the feedstock to cement production.
<p>With respect to the amount of new land that is excavated every year – the average for the past 10 years as reported in The Ontario Aggregate Resources Corporation annual production report is approximately 2600 acres per year.</p> <p>An average of 2000 acres per year is rehabilitated for a total net new disturbed area of 600 acres.</p>	<p>The publicly available data on excavation over the long term does not support this claim. TOARC data indicates that the acres under licence for gravel extraction have increased from 221,000 acres in 1998 to 333,000 acres in 2020, an increase of 112,000 acres or almost 5,000 acres per year.⁸</p> <p>TOARC data indicates the total disturbed area has increased from 50,000 acres in 1998 to 83,000 in 2020, an increase of 33,000 acres or 67%.⁹ The acres scarred by gravel mining in Ontario is increasing each year, rehabilitation is not keeping up.</p>

⁷ <https://toarc.com/production-statistics/>

⁸ <https://toarc.com/production-statistics/>

⁹ <https://toarc.com/production-statistics/>

A MORATORIUM ON ALL NEW GRAVEL MINING APPROVALS TODAY

—a step towards a sustainable tomorrow

ISSUES

- 1 Gravel mining permanently changes the existing natural environment and causes numerous negative impacts to surrounding communities. It is not a benign activity.
- 2 The gravel mining industry provides the raw materials for cement production, highway construction and urban sprawl. These activities are significant contributors to greenhouse gas emissions in Ontario.
- 3 Ontario's current application process for gravel mining:
 - Allows uncontrolled proliferation of gravel sites across Ontario
 - Favours corporations and places an unfair burden on municipalities and local communities forced to advocate for the protection of the natural environment and built communities
 - Does not fulfill the requirements for free, prior and informed consent of Indigenous Nations as guaranteed in the Canadian constitution

POLICY PROPOSAL

- 1 Impose an immediate moratorium on all new gravel mining approvals (including interim orders and site plan amendments for mining below the water table or that increase licensed tonnages).
- 2 Create an independent panel to conduct broad consultations involving Indigenous Nations, municipalities, affected communities, industry, and independent experts and scientists.
- 3 Chart a new path forward for gravel mining which:
 - Prevents greater climate chaos
 - Protects groundwater and farmland
 - Increases the weight of local perspectives in land use planning
 - Ensures long term supplies of a finite resource
 - Honours treaties and obligations with Indigenous Nations as prescribed in the Canadian Constitution

IMPACT OF A MORATORIUM

A moratorium on new approvals of gravel mining sites in Ontario will:

- 1 Provide an opportunity to **update gravel mining industry policies** and regulations to reflect current societal expectations and meet the national and international requirements of addressing climate change.
- 2 **Respond to the urgent requests** from thousands of Ontario residents (predominantly rural) struggling with the threats to their families, homes and communities from gravel mining.
- 3 **NOT impact** the current supply of gravel required to meet Ontario's needs.
- 4 **NOT impact** the rights existing gravel mining operators have to continue their existing operations as they do today.
- 5 **NOT impact** current employment in the gravel mining industry.

FOUR FACTS ON GRAVEL MINING IN ONTARIO

FACT #1

The provincial government has authorized the gravel mining industry to extract thirteen times more gravel each year than is required to meet average annual consumption.

- On average 157.4 million tonnes of gravel was extracted annually over the past 10 years in Ontario.^{1,2}
- 2.05 billion tonnes of gravel extraction are allowed each year from the 5000-plus licensed gravel mining sites in Ontario. (Note: 800-plus sites, {approximately 15%} are permitted to extract unlimited tonnages each year. These amounts are in addition to the 2.05 billion tonnes mentioned above.)

FACT #2

Gravel mining consumes an average of 5,000 acres of land in Ontario each year.

- Licenses for gravel extraction have increased from 183,000 acres in 1992 to 333,000 acres in 2020³, an increase of almost 150,000 acres or 5,000 acres per year over the past three decades. That's a land area equivalent to two proposed Melancthon mega-quarries each year.⁴

FACT #3

The gravel mining industry doesn't pay its fair share, for example municipal property taxes.

- Municipalities challenge preferential property tax treatment given to gravel mining sites.
- Disputes continue between Ontario Municipalities and the gravel industry over property taxes.
- Examples:
 - Wellington County asserts that *"other sectors, mainly residential and small business, are subsidizing the aggregate industry's artificially low valuations"*.
 - In Puslinch Township *"single family homes in Puslinch pay more taxes than 100-acre active (gravel) sites"*.⁵

FACT #4

The gravel mining industry supplies sand, stone and gravel for cement production, highway construction and urban sprawl, which make significant contributions to greenhouse gas emissions in Ontario.

- The cement industry produces 8% of global carbon emissions, as a country it would be the third largest global emitter of CO₂.⁶
- Transportation has become the biggest source of GHG emissions in Ontario.⁷

RECOMMENDED AREAS OF CONSULTATION AND INQUIRY

- Determine the total amount of licensed supply in Ontario's 5000-plus pits and quarries.
- Propose criteria and processes for determining and demonstrating the need for new gravel mining sites.
- Define limits on 'virgin' aggregate extraction, and set targets for aggregate reprocessing in order to ensure sustainable management of the finite gravel resources in Ontario.
- Propose revisions to application procedures which fully honour Indigenous Nations' treaty rights.
- Recommend updated policies and restrictions for gravel mining below the water table to reflect current groundwater sciences.
- Propose methods which increase the weight given to municipal and community perspectives in gravel mining decisions.
- Recommend approaches to ensure that gravel mining sites are not allowed to transform themselves in significant ways after initial approval. This would include changes to progressive or final rehabilitation plans.
- Recommend a fair levy for gravel mining that includes compensation for the full social and environmental costs of its extraction.
- Recommend approaches to gravel mining oversight to ensure full compliance with all regulations and license conditions.

1. Aggregate Resources Statistics in Ontario, Production Statistics annual reports, The Ontario Aggregate Resources Corporation (TOARC)

2. Active aggregate sites and related maximum tonnage

3. Aggregate Resources Statistics in Ontario, Production Statistics annual reports, The Ontario Aggregate Resources Corporation (TOARC)

4. <https://www.inthehills.ca/2011/06/melancthon-mega-quarry-by-the-numbers>

5. Presentation, Ken DeHart, Wellington County Treasurer May 30th 2021 Gravel Watch Ontario

6. <https://www.carbonbrief.org/qa-why-cement-emissions-matter-for-climate-change>

7. Why Are Ontario's GHG emissions going up instead of Down? Environmental Defence, April 21, 2020



**THE CORPORATION
OF
THE TOWN OF HALTON HILLS**

Resolution No.:

Title: **New Gravel Extraction Licensing applications**

Date: February 7, 2022

Moved by: **Mayor R. Bonnette**

Seconded by: **Councillor J. Fogal**

Item No.

WHEREAS Ontario currently has over 5000 licenced pits and quarries located throughout the province that are able to meet the expected near term needs of Ontario's construction industry;

AND WHEREAS applications continue to be submitted without a definitive determination if there is a need for additional supply;

AND WHEREAS gravel pits and quarries are destructive of natural environments and habitats;

AND WHEREAS pits and quarries have negative social impacts on host communities in terms of noise, air pollution, and truck traffic;

AND WHEREAS the urgent need to reduce greenhouse gas emissions in order to combat climate change has brought awareness to the very high carbon footprint associated with the production of concrete and asphalt which are major end-users of aggregates;

AND WHEREAS there is an obligation to consult with First Nations peoples regarding the impacts of quarries on treaty lands and a responsibility to address those impacts;

NOW THEREFORE BE IT RESOLVED THAT the Ontario government be requested to impose an immediate temporary moratorium on all new gravel

mining applications pending a broad consultation process including with First Nations, affected communities, independent experts and scientists to chart a new path forward for gravel mining in Ontario which:

- Proposes criteria and processes for determining the need for new gravel licences;
- Recommends updated policies and restrictions for gravel mining below the water table to reflect current groundwater sciences;
- Develops new guidelines for reprocessing in order to ensure sustainable aggregate supplies;
- Recommends a fair levy for gravel mining that includes compensation for the full environmental and infrastructure maintenance costs to the local community of extraction and distribution of aggregate;
- Provides greater weight to the input by local municipalities to lessen the social impacts from mining operation and trucking through their communities;
- Proposes revisions to application procedures which fully honour First Nations' treaty rights;

AND FURTHER THAT a copy of this resolution be sent to the Honourable Doug Ford Premier of Ontario, the leaders of all Provincial Parties, Minister of Natural Resources and Forestry, the Honourable Ted Arnott MPP, AMO, Small Urban GTHA Mayors, Town of Milton, Town of Oakville, City of Burlington and Region of Halton.

Mayor Rick Bonnette