



July 13, 2020

Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
777 Bay Street
23rd Floor, Suite 2304
Toronto, ON M7A 2J3

Dear Sir or Madam

**Re: Proposed Changes to the Greater Golden Horseshoe Growth Plan –
ERO# 019-1680**

Thank you for the opportunity to provide comments on ERO # 019-1680 regarding proposed amendments to the Growth Plan. OSSGA is a not-for-profit association representing over 280 sand, gravel and crushed stone producers and suppliers of valuable industry products and services. Collectively, our members supply the majority of the 164 million tonnes of aggregate consumed, on average, annually in the province to build and maintain Ontario's infrastructure needs. OSSGA works in partnership with government and the public to promote a safe and competitive aggregate industry contributing to the creation of complete communities in the province.

As noted by the Province in ERO # 019-1680 “A Place to Grow supports the *More Homes, More Choice: Ontario’s Housing Supply Action Plan* to increase housing supply, create more jobs, attract business investments and better align our infrastructure” and “Mineral aggregate resources play a crucial role in the development of housing and municipal infrastructure. Ensuring adequate aggregate resources are available is critical to achieving the success of A Place to Grow.”

As a result, the Province proposes the following change to Section 4.2.8 of the Growth Plan: “4.2.8 is amended by adding “and” at the end of policy 4.2.8.2 a) i., deleting policy 4.2.8.2 a) ii. “habitat of endangered species and threatened species” and renumbering the policy accordingly.”

OSSGA supports this revision to the Growth Plan since over the next 25 years the growth in the Greater Golden Horseshoe (GGH) requires over 2.5 billion tonnes of



aggregate in the GGH, of which 1.5 billion tonnes is needed in the GTA and new mineral aggregate operations will be needed.

As the Province is aware, 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. The proposed revision to the Growth Plan appropriately recognizes this fact and still ensures protection of endangered and threatened species in accordance with the requirements of the Endangered Species Act. All new and expanded mineral aggregate operations within the Growth Plan are still subject to the following policy of the PPS: “2.1.7 *Development and site alteration* shall not be permitted in *habitat of endangered species and threatened species*, except in accordance with *provincial and federal requirements*.” This policy ensures that mineral aggregate operations are not permitted in habitat of endangered and threatened species, *unless the proposal is in accordance with the Endangered Species Act*, which requires the application to demonstrate an overall benefit to the species.

Without this change, new aggregate resources will not be available to supply the Province’s infrastructure and growth requirements close to the consumer which ultimately reduces the cost of construction and infrastructure projects. 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 change 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.

Thank you for consideration of our comments.

Yours truly,

Norman Cheesman
Executive Director