

November 22, 2012

The Honourable Bob Chiarelli
Minister of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, Ontario M5G 2E5

The Honourable Michael Gravelle
Minister of Natural Resources
Suite 6630, 6th Floor, Whitney Block
99 Wellesley Street West
Toronto, Ontario M7A 1W3

The Honourable Ted McMeekin
Minister of Agriculture, Food and Rural Affairs
11th Floor, 77 Grenville Street
Toronto, Ontario M5S 1B3

Dear Ministers Chiarelli, Gravelle and McMeekin

RE: EBR# 011-7070, the Provincial Policy Statement five-year review and the protection of prime farmland and significant natural heritage features from aggregates extraction

We are writing to express our deep concern about proposed revisions to the Provincial Policy Statement (PPS) which fail to protect prime farmland and significant natural heritage features from aggregates extraction. We believe that these changes are fundamentally at odds with the proposed PPS vision which has been amended to emphasize such values as sustainable and resilient communities, human health, biodiversity, resilience to climate change and Ontario-grown food. We strongly support this new vision, and trust that our comments below will be understood in that light – that is, as constructive criticism on how to better achieve that vision.

The current PPS has been faulted for giving clear preference to aggregates extraction over prime farmland, water resources, wetlands, woodlands and wildlife habitat. Unfortunately, the revised draft includes changes that would offer even more preferential treatment to aggregates extraction.

The rehabilitation loophole

Specifically, the promise of ‘rehabilitation’ creates a dangerous policy loophole that would allow aggregates extraction to proceed in prime farmland, including specialty crop areas (section 2.5.4.1), and in significant natural heritage features (2.5.3.2). This loophole must be closed, for the following reasons.

First, there is no fixed term to aggregates licences. They are open-ended, so that pits and quarries typically remain open for decades. Consequently, rehabilitation may not occur for

many, many years— if it ever occurs. In fact, there are over 4,000 abandoned pits and quarries in Ontario that have yet to be rehabilitated. The loss of food-producing lands and natural heritage features is long-term, if not permanent. It is truly disingenuous to deem aggregates extraction an ‘interim use’ (e.g., as described in revised section 2.5.4.1).

Second, the science of rehabilitation is far from perfect. For this reason, as is widely recognized in the field of ecological restoration, rehabilitation should never be used as an excuse to destroy high-value landscape features. In this case, removing huge quantities of rock and gravel results in permanent changes to hydrology and soils, and thus to the conditions which support particular crops and plant and animal life. Humans are simply unable to fully recover the agricultural and biodiversity values and ecological functions that are lost when aggregates extraction proceeds. Rehabilitation must not be used to justify aggregates extraction in prime farmland and significant natural features.

Request

For the foregoing reasons, the undersigned organizations request that your ministries work together to ensure that the revised PPS prohibits aggregates extraction in prime farmland and significant natural features, and on lands adjacent to these features to ensure their protection. Specifically, we call on you to include the following revisions:

1. Revise section 2.5.4.1 so that aggregates extraction is strictly prohibited on prime farmland (Classes 1 - 3) and in specialty crop areas, without exception.
2. Remove in its entirety proposed section 2.5.3.2, which opens the door to aggregates extraction in significant wetlands, significant woodlands, significant wildlife habitat and the significant habitat of endangered and threatened species, and on lands adjacent to these features. Aggregates extraction must be prohibited in these areas, without exception.

We understand that aggregates are a valuable resource, and that extraction must and will occur. However, there are other fundamentally important values at stake including food, water and biodiversity. In an era of climate change, ongoing biodiversity loss, and increasing public demand for local foods, the government must not allow aggregates extraction to take priority over the protection of these other values.

As the controversy over the Highland mega-quarry in Melancthon has demonstrated, land-use planning that protects food, water and biodiversity has never been more critical. We therefore urge you to ensure that the revised PPS policies regarding aggregates extraction align with the proposed vision, which upholds values of importance to all Ontarians - sustainable and resilient communities, human health, biodiversity, clean air and water, resilience to climate change and Ontario-grown food.

We look forward to your timely response to this urgent request.

Yours truly,

Michael Stadtländer
President
Canadian Chefs' Congress



Dr. Faisal Moola,
Director General, Ontario and
Northern Canada,
David Suzuki Foundation



Christopher Lister
President
The Ecological Farmers of
Ontario



Christie Young
Executive Director
Farm Start



Jamie Reaume
Holland Marsh Growers
Association



Don Mills
President
Local Food Plus



Ann Slater
Coordinator
National Farmers Union
Ontario



Norman Ragetlie
Chair
Ontario Farmland Trust



Mark Wales
President
Ontario Federation of
Agriculture



Caroline Schultz
Executive Director
Ontario Nature



Jodi Koberinski
Executive Director
Organic Council of Ontario



Voula Halliday
Leader
Slow Food Toronto

