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

This submission is on behalf of the staff at Sustain Ontario. Sustain Ontario is the provincial alliance for healthy food and farming. We have over 340 members from the agriculture, environment, health and education sectors.

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 ever. 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 staff at Sustain Ontario request that your ministries work together to ensure that the revised PPS prohibits aggregate 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 are encouraged to see new language about building strong and “healthy” communities, promoting land use that “maintains biodiversity and resilience to climate change”, “encouraging consultation with Aboriginal communities”, and “providing opportunities to support local food” as a way to support long-term economic property. We are also encouraged to see the new language around "on-farm diversified uses." This term, along with “value retaining facilities”, “agriculture-related industrial uses”, “on-farm diversified uses” and “value added uses,” requires clarification.

There should be additional consultation with agricultural stakeholders and municipalities on definitions to ensure they are appropriately scoped and not overly limiting for the purposes of the policy. Also, aggregate restrictions pertain to specialty crop areas, but these are poorly defined. It is our belief that "specialty crop areas" should include market gardens in close proximity to urban areas. Finally, we do not feel that the PPS proposal to require limiting the size of surplus farm dwelling lots, to the minimum size needed to accommodate the use with private on-site services fully addresses the problem of fragmentation of farmland and loss farm properties and infrastructure that accommodate and are accessible to new entrant farmers. These recommendations are not wholly endorsed by the Sustain Ontario alliance. They are, however, taken from a number of submissions made by our member organizations.