



Ontario Federation of Agriculture

Ontario AgriCentre

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April 21, 2017

Ms. Rebecca Zeran
Senior Policy Advisor
Resource Development Section
Ministry of Natural Resources and Forestry
300 Water Street, 2 South
Peterborough, ON
K9J 8M5

Dear Ms. Zeran;

Re: Regulatory Registry 17-MNRF004 Proposed changes to Regulation 244/97 (under the Aggregate Resources Act) regarding fees and royalties

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 36,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

OFA views this move to increase fees and royalties as a good first step. Further discussion and consideration of the structure of fees and royalties is necessary to raise them to levels that are appropriate in the 21st century.

While OFA supports the overall increase in fees and royalties under the Aggregate Resources Act, we are extremely disappointed in the miniscule increase in the allocation to the Aggregate Resources Trust, earmarked for rehabilitation and research. In our opinion, the increase from 0.5 ¢/tonne to 0.6 ¢/tonne will not achieve any progress towards rehabilitating Ontario's "abandoned" pits and quarries, many of which are found on agricultural land.

OFA believes that increasing the funding for the Aggregate Resources Trust to work rehabilitate these sites would see them restored to productive agricultural uses, etc. in a more timely fashion. The provincial government is proposing to double the fees and royalties allocated to local and upper tier municipalities. OFA strongly recommends that the fees and royalties allocated to the Aggregate Resources Trust be doubled, to 1.0 ¢/tonne.

The proposed amendment to fees and royalties fails to address the circumstances of municipalities along haul routes. These municipalities do not host a pit or quarry, so are ineligible for any fees and royalties, but nevertheless have to contend with wear and tear on their roads serving as haul routes. In the past, OFA has advocated for an allocation to municipalities that do not host a pit or quarry, but whose roads are utilized. OFA strongly recommends that a portion of the fees and royalties be allocated to "haul route" municipalities to address wear and tear on their roads serving as haul routes.

Inadequate funding is limiting the Ministry's abilities to effectively oversee, administer and enforce its obligations under the Aggregate Resources Act. OFA proposes that the allocation to the province be directed into a special purpose account earmarked solely for funding the Ministry's Aggregate Resources Act roles and responsibilities.

OFA welcomes this opportunity to present its perspectives on changes to fees and royalties levied under the Aggregate Resources Act. We also look forward to collaborating with Ministry staff on amendments to the Aggregate Resources Act, regulations and operating standards as envisioned under A Blueprint for Change: A Proposal to modernize and strengthen the Aggregate Resources Act policy framework.

Sincerely,



Keith Currie
President

KC/pj

cc: Hon. Kathryn McGarry; Minister of Natural Resources and Forestry
Hon. Jeff Leal; Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors