

April 18, 2019

The Honourable Rod Phillips
Minister of Environment, Conservation and Parks
77 Wellesley Street West
11th Floor
Toronto, ON
M7A 2T5

Dear Minister Phillips;

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 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.

Over the preceding years, the Ministry of Environment, Conservation and Parks posted draft Excess Soil Management regulatory proposals on the Environmental Bill of Rights Registry for public comment. Urban growth and redevelopment, primarily within the area covered by the Growth Plan for the Greater Golden Horseshoe has brought the challenges of dealing with large volumes of excess soil to rural Ontario. While clean top soil can improve fertility and productivity of agricultural land, and top soil and subsoils can improve the rehabilitation of pits and quarries after all available aggregate has been removed, we remain in a policy, tracking and enforcement vacuum. The lack of effective government regulation of excess soil movement, along with the lack of tracking soil movements from source to end use can negatively impact our environment through unregulated dumping of excess soils on prime agricultural lands.

OFA supported the adoption of an Excess Soil Management regulation in 2017-2018. We now encourage you to bring into force the Excess Soil Management regulation.

Sincerely,



Keith Currie
President

KC/pj

cc: OFA Board of Directors