

February 15, 2022

Cathy Curlew  
MNDMNRF - RPDPB - Resources Development Section  
300 Water Street  
2nd Floor, South Tower  
Peterborough, ON  
K9J 3C7

Submitted via email: [aggregates@ontario.ca](mailto:aggregates@ontario.ca)  
and submitted online via Environmental Registry of Ontario (ERO)

Dear Cathy Curlew,

**Re: ERO 019-4801 - Proposed regulatory changes for the beneficial reuse of excess soil at pits and quarries in Ontario**

The Ontario Federation of Agriculture (OFA) is pleased to provide comments to the Ministry of Ministry of Northern Development, Mines, Natural Resources and Forestry (MNDMNRF) regarding ERO 019-4801 - Proposed regulatory changes for the beneficial reuse of excess soil at pits and quarries in Ontario. OFA is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted, and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

OFA believes that agricultural activities make the best use of arable lands, and that the productivity of those lands must be maintained. While we recognize the critical importance of aggregates for upgrading and maintaining our networks of roads and bridges, as well as for residential, commercial, institutional and industrial construction, we insist that agricultural lands be fully rehabilitated to their former use for sustainable agricultural production, in a timely manner.

Aggregate extraction from agricultural lands requires unique attention given the requirement to rehabilitate these lands back to agricultural use. We concede that in some circumstances, excess soils removed from construction activities may provide an opportunity to rehabilitate aggregate pits and quarries quickly and effectively. Excess soils accepted at pits and quarries located on lands being rehabilitated to agricultural uses must meet the "agricultural and other property use" standards as a minimum, and not compromise future agricultural activities. Furthermore, there must be a means to ensure that the spread and broader establishment of invasive plants is not facilitated through the use of excess soils in pit and quarries.

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OFA appreciates the requirement for applicants on existing approved sites to follow soil quality standards for agricultural and other property use under the EPA on private land when the future use is not identified in the approved rehabilitation plan, so that future uses of the property are not limited.

We trust our opinions and recommendations will be given due consideration in this consultation.

Sincerely,

A handwritten signature in black ink that reads "Peggy Brekveld". The signature is written in a cursive style and is positioned to the left of a vertical line.

Peggy Brekveld  
President

cc: The Honourable Lisa Thompson, Minister of Agriculture, Food, and Rural Affairs  
OFA Board of Directors