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October 25, 2019

Natural Resources Conservation Policy Branch
Atn: Andrew MacDonald
200 Water Street
Peterborough, ON
K9J 8M5

**Re: Proposed Amendments to the Aggregates Resources Act
ERO Number: 019-0556**

The Municipality of Trent Lakes Council and staff have reviewed the proposed amendments to the Aggregates Resources Act (ARA) posted on September 20, 2019 to the Environmental Registry of Ontario website. The Municipality of Trent Lakes requests that the Province of Ontario consider a better balance between the Aggregate Resources Act and the Planning Act, provincial interests and community interests, short-term benefit and long-term sustainability.

Background & Issues:

- The heavy truck traffic associated with pits and quarries significantly degrades the condition of roadways within the Municipality resulting in a higher than normal replacement/maintenance costs to the Municipality.
- Other than regular property taxes, the Municipality does not collect any additional licensing fees directly from pits and quarries that operate within the Municipality.
- The MNRF is responsible for collecting licensing fees/royalties and does share a portion with the Municipality. The Municipality has presented many delegations in the past requesting the municipal portion of the fees/royalties be increased. In 2018 the rates were doubled from the previous year, however the total amount received is still far below the actual cost to the municipality.
- There are 35 active pits and quarries on private lands and an unknown number of applications for crown land in the Municipality of Trent Lakes.

Key Points & Impacts:

- The 2018 royalty rate was \$0.12 per tonne of aggregate under O. Reg 244/97 and is intended to be index annually for inflation. The 2017 royalty rate was \$0.06 per tonne.

- The total amount received in 2018 was \$55,137.59.
- The average cost to resurface one kilometre of road is approximately \$150,000.
- Municipalities are given very little notice or ability to provide input on proposed pits and quarries on crown land.

Comments Regarding Proposed Changes to ARA:

- Review of aggregate levy and royalty: Trent Lakes is requesting that the Minister includes Trent Lakes in the forthcoming discussions related to fees to offset the cost of infrastructure as a result of the impact of aggregate operations and that those discussions include levies and royalties. And that the Minister schedules a full review of the fees and royalties to ensure the added costs to municipalities is fully covered and the importance of the fees and royalties are paid to municipalities. Royalties currently received by the municipality are insufficient to fund the improvement to municipal roads, bridges and infrastructure. There is a discrepancy between the real costs to the local municipality and the royalties currently paid by the industry.
- Increase the roles of municipalities in the application review process: The proposed changes to Aggregate Resources Act propose to remove municipal involvement in aggregate applications. Trent Lakes is requesting that the Minister review the application process for new pits and quarries to ensure the municipalities increase their involvement in the application process and allow the host municipality a greater coordinating role with the Province. We further request that the local municipality be notified earlier in the application process of a proposed or pending quarry on crown land in order that we are at least aware of the applications. Half of the existing quarries are located on private lands and the other half are located on crown lands.


The Municipality of Trent Lakes is requesting that the Ministry continue in their diligence to ensure that the local municipalities continue to receive 61% of the fees and royalties and not revise or amend their position as a result of pressure from the aggregate industry.

It is a well-known fact throughout the Province that all municipalities, rural and urban, are experiencing substantial infrastructure funding deficits. For municipalities with aggregate operations, this infrastructure deficit has accrued as a result of the extra wear and damage to roads during the transportation of the large and heavy quantities of aggregates to outside their municipality. In addition, it continues to be our belief that the aggregate industry should contribute its equitable and fair share to the maintenance of the Municipal infrastructure it so heavily relies upon to transport the aggregate materials to where they are needed so they can make their profits.

While the increased fees from licenses, wayside permits and aggregate permits (crown land) will greatly assist Trent Lakes in our infrastructure deficit, the costs for infrastructure repairs continues to increase often beyond the level of the Consumer Price Index. The average cost to reconstruct one (1) kilometre of road complete with an asphalt surface is approximately \$155,000. This does not include any bridge or culvert repairs which increases the overall cost. It is estimated that one year of our share of the new fees will cover less than one kilometre of road. This leaves a significant balance of the cost to be borne by our taxpayers for damage done by these quarry trucks.

The Municipality of Trent Lakes is committed to working with the Province in the review of the ARA and look forward to providing input on the proposed amendments to the regulations and future implementation documents related to these proposed changes.

Sincerely,

A handwritten signature in black ink that reads "Tiffany Ly". The signature is written in a cursive, flowing style.

Tiffany Ly

Planning Administer

Municipality of Trent Lakes