



Monday, November 4, 2019

Andrew MacDonald
Natural Resources Conservation Policy Branch
Ministry of Natural Resources and Forestry
300 Water Street
Peterborough, ON K9J 8M5

EACOM Comments to ERO Number 019-0556 Proposed Amendments to the Aggregate Resources Act

Dear Mr. MacDonald,

EACOM is a proud Canadian softwood lumber company with 6 manufacturing facilities in Northern Ontario. Our team appreciates the opportunity to comment on the proposed amendments to the Aggregate Resources Act and I am pleased to submit comments on behalf of the Company.

EACOM utilizes aggregate for the construction of forest access roads on Crown land to facilitate our logging operations that supply wood to EACOM's sawmills in Ear Falls, Elk Lake, Gogama, Nairn Centre, and Timmins, Ontario. These forest access roads also serve the public in providing infrastructure for endless recreation opportunities and supporting other industries such as mineral exploration, mining, and Ontario's booming tourism operators. These roads also act as designated emergency routes for many communities.

All our aggregate permits involve pits that are located on Crown land and any material extracted is used for the building and maintenance of public roads. The Aggregate Resources Act currently requires significant reporting and permitting, more appropriate for the commercial aggregates industry operating in Southern Ontario. EACOM encourages the government to consider modifications to the Act that also supports the Ministry's intention to promote growth in our sector via the forestry strategy.

We have reviewed the proposed amendments to the Aggregate Resources Act and would like to provide the following comments:

- EACOM wishes to flag MNRF's intention to look into "creating a more robust application process for existing operators that want to expand to extract aggregate within the water table, allowing for increased public engagement", highlighting that there should be a rationale for additional administrative burden.
- EACOM is encouraged to see that more flexibility will be provided for regulations to permit self-filing of routine plan amendments and we support consideration of regulatory changes to allow operators to self-file changes to existing plans for some routine activities.
- EACOM supports streamlining the compliance reporting requirements, while maintaining the annual requirement, as this could reduce administrative burden.
- EACOM strongly supports maintaining current aggregate fees. Since EACOM utilizes aggregate to build and maintain public infrastructure, we request that aggregate permits involving forest access roads on Crown land open to the public remain under the current flat rate fee structure.

EACOM continues to be committed to engaging with MNRF on matters associated with our operations and related policy development. We look forward to continued discussion on this subject.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Tallman".

Jennifer Tallman, R.P.F.
Chief Forester, Ontario
EACOM Timber Corporation