



Friday November 25, 2022

Ministry of Environment, Conservation, and Parks

Re: Comments on the Amendments to Certain Requirements under the Excess Soil Regulation

To Whom It May Concern,

The Landscape Ontario Horticultural Trades Association represents over 3,300 businesses in the landscape trades in Ontario. Our members design, build, maintain our green spaces. They grow our plants, shrubs, annuals, perennials, and our trees. They are the conduit for living green infrastructure to the public.

The majority of our members are landscape contractors. These are the businesses that install and maintain living green infrastructure. It is these companies that the Excess Soil Regulation impacts directly.

We are appreciative of the recently announced amendments and feel that this is a step in the right direction. It is clear that the focus of this Excess Soil Regulation is to limit the transportation and dumping of contaminated soil. With the amendments to exclude residential, industrial, institutional, and agricultural lands, it is our hope that the MECP will also make the following proposed amendment:

For your consideration, we encourage the MECP to remove the requirement for hauling records for loads 5 cubic metres or less. A 1-ton landscape truck is capable of holding approximately 4 cubic metres. We estimate thousands of loads per day of soil removed from properties across Ontario at the height of the landscaping season. The resulting amount of hauling records will be significant.

The vast majority of our members are small landscape companies with already stretched resources as we are experiencing a crisis in the availability of labour and skilled trades people. Thinking in practical and real terms, we believe that they will not keep up with maintaining a hauling record despite our efforts to inform, and empower them with a proper tool.

We appreciate the work the MECP is doing to protect the lands we live on. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Salemi".

Joe Salemi, CAE

Executive Director

Landscape Ontario Horticultural Trades Association