



Top  
Aggregate  
Producing  
Municipalities of  
Ontario

November 30, 2023

Reema Kureishy  
Environmental Policy Branch  
Ministry of the Environment, Conservation and Parks  
40 St. Clair Ave West, 10<sup>th</sup> Floor,  
Toronto, ON M4V 1M2

Dear Ms. Kureishy:

I am writing in regards to ERO-019-763. Recently, I was invited to attend a meeting with the Ministry of Municipal Affairs and Housing (MMAH), Ministry of Natural Resources and Forestry (MNRF), Ministry of Environment, Conservation and Parks (MECP), the Ontario Stone, Sand, and Gravel Association (OSSGA), and many others as part of the Recycled Asphalt Task Force.

We would like to file an objection to the Environmental Registry of Ontario (ERO) office posting, to provide more time for municipal staff review. During the meeting the presenter stated that exemptions are being considered from Environmental Compliance Approvals (ECA) requirements. It is vitally important TAPMO member municipalities review these proposed changes, which remove setbacks from water features.

With the presence of seven MNRF staff, it would appear as aggregate operations are going to be utilized for the processing of recycled asphalt. Recycled asphalt processing is considered an industrial use, and allowing them to proceed under the current zoning approvals would equate to a tax shelter. We request that industrial uses reflect municipal zoning approvals and appropriate industrial taxation. We are open to discussing the approval aspect further, but the taxation should reflect the industrial use (and valuation) of an asphalt recycling plant.

I also raised my concerns around site plan non-compliance within the aggregate industry. So far, the Township of Puslinch has not had favourable experiences when raising site plan compliance issues with the MNRF. If the Province adds recycled asphalt processing to the permissions within the licenced boundary of an aggregate operation, the host Municipality becomes a commenting agency. All enforcement and compliance falls, under the authority of the MNRF not the host Municipality.

We request additional time to provide a more comprehensive response to ERO-019-7636

Regards,

A handwritten signature in black ink, appearing to read 'James Seeley', is written over a light blue decorative graphic consisting of several overlapping, curved lines.

James Seeley  
Chair