

## Miranda Borris

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**Subject:** FW: Website Delegation Request - Graham Flint - Reform Gravel Mining Coalition  
**Attachments:** RGMC\_Policy\_Brief\_jan23.pdf

**From:** [noreply@esolutionsgroup.ca](mailto:noreply@esolutionsgroup.ca) <[noreply@esolutionsgroup.ca](mailto:noreply@esolutionsgroup.ca)>

**Sent:** Tuesday, March 8, 2022 1:33 PM

**To:** [MB-townclerk@milton.ca](mailto:MB-townclerk@milton.ca) <[Townclerk@milton.ca](mailto:Townclerk@milton.ca)>

**Subject:** Website Delegation Request - Graham Flint - Reform Gravel Mining Coalition

Hello Town Clerk's Staff,

Please note the following response to Delegate Request Application has been submitted at Tuesday March 8th 2022 1:32 PM with reference number 2022-03-08-185.

<https://forms.milton.ca/Management/Response/View/315873fd-a7db-407a-8f44-41be6d23c3b8>

### Application Information

- **First Name:**  
Graham
- **Last Name**  
Flint
- **Email Address:**  
[REDACTED]
- **Phone number:**  
[REDACTED]
- **Street Address:**  
[REDACTED]
- **Town**  
Campbellville
- **Postal Code:**  
[REDACTED]
- **Are you representing a group?**  
Yes
- **Group Name**  
Reform Gravel Mining Coalition

- **Council Meeting Date**  
3/21/2022
- **Please indicate how you intend to interact with the online Council Meeting**  
Both audio and video
- **Please describe the issue you intend to present:**  
I will be addressing the motion from Councilors Best and Derksen regarding Milton's support for a Moratorium on New Gravel Mine Approvals
- **Please describe specific actions you want Council to take:**  
Will be encouraging Council to support the motion.
- **Please provide your comments in support of or in opposition to the staff recommendation:**  
The Reform Gravel Mining Coalition was launched in January of 2022. Our first campaign is the Demand A Moratorium Now! (The DAMN! Campaign) calling on the Province to declare a moratorium on new gravel mine approvals until an independent panel of stakeholders and experts can chart a new path forward.
- **Optional: Upload the written submission that you wish to share with Council (single document, maximum 15 MB)**
  1. [RGMC Policy Brief jan23.pdf \[354.9 KB\]](#)
- **Do you give your permission to be audio and video recorded on the Town of Milton's live Council meeting stream?**  
Yes I give my permission

[This is an automated email notification -- please do not respond]



**esolutionsNoReply -External Contact**

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[www.milton.ca](http://www.milton.ca)

# A MORATORIUM ON ALL NEW GRAVEL MINING APPROVALS TODAY

## —a step towards a sustainable tomorrow

### ISSUES

- 1 Gravel mining permanently changes the existing natural environment and causes numerous negative impacts to surrounding communities. It is not a benign activity.
- 2 The gravel mining industry provides the raw materials for cement production, highway construction and urban sprawl. These activities are significant contributors to greenhouse gas emissions in Ontario.
- 3 Ontario's current application process for gravel mining:
  - Allows uncontrolled proliferation of gravel sites across Ontario
  - Favours corporations and places an unfair burden on municipalities and local communities forced to advocate for the protection of the natural environment and built communities
  - Does not fulfill the requirements for free, prior and informed consent of Indigenous Nations as guaranteed in the Canadian constitution

### POLICY PROPOSAL

- 1 Impose an immediate moratorium on all new gravel mining approvals (including interim orders and site plan amendments for mining below the water table or that increase licensed tonnages).
- 2 Create an independent panel to conduct broad consultations involving Indigenous Nations, municipalities, affected communities, industry, and independent experts and scientists.
- 3 Chart a new path forward for gravel mining which:
  - Prevents greater climate chaos
  - Protects groundwater and farmland
  - Increases the weight of local perspectives in land use planning
  - Ensures long term supplies of a finite resource
  - Honours treaties and obligations with Indigenous Nations as prescribed in the Canadian Constitution

### IMPACT OF A MORATORIUM

A moratorium on new approvals of gravel mining sites in Ontario will:

- 1 Provide an opportunity to **update gravel mining industry policies** and regulations to reflect current societal expectations and meet the national and international requirements of addressing climate change.
- 2 **Respond to the urgent requests** from thousands of Ontario residents (predominantly rural) struggling with the threats to their families, homes and communities from gravel mining.
- 3 **NOT impact** the current supply of gravel required to meet Ontario's needs.
- 4 **NOT impact** the rights existing gravel mining operators have to continue their existing operations as they do today.
- 5 **NOT impact** current employment in the gravel mining industry.

## FOUR FACTS ON GRAVEL MINING IN ONTARIO

### FACT #1

**The provincial government has authorized the gravel mining industry to extract thirteen times more gravel each year than is required to meet average annual consumption.**

- On average 157.4 million tonnes of gravel was extracted annually over the past 10 years in Ontario.<sup>1,2</sup>
- 2.05 billion tonnes of gravel extraction are allowed each year from the 5000-plus licensed gravel mining sites in Ontario. (Note: 800-plus sites, {approximately 15%} are permitted to extract unlimited tonnages each year. These amounts are in addition to the 2.05 billion tonnes mentioned above.)

### FACT #2

**Gravel mining consumes an average of 5,000 acres of land in Ontario each year.**

- Licenses for gravel extraction have increased from 183,000 acres in 1992 to 333,000 acres in 2020<sup>3</sup>, an increase of almost 150,000 acres or 5,000 acres per year over the past three decades. That's a land area equivalent to two proposed Melancthon mega-quarries each year.<sup>4</sup>

### FACT #3

**The gravel mining industry doesn't pay its fair share, for example municipal property taxes.**

- Municipalities challenge preferential property tax treatment given to gravel mining sites.
- Disputes continue between Ontario Municipalities and the gravel industry over property taxes.
- Examples:
  - Wellington County asserts that *"other sectors, mainly residential and small business, are subsidizing the aggregate industry's artificially low valuations"*.
  - In Puslinch Township *"single family homes in Puslinch pay more taxes than 100-acre active (gravel) sites"*.<sup>5</sup>

### FACT #4

**The gravel mining industry supplies sand, stone and gravel for cement production, highway construction and urban sprawl, which make significant contributions to greenhouse gas emissions in Ontario.**

- The cement industry produces 8% of global carbon emissions, as a country it would be the third largest global emitter of CO<sub>2</sub>.<sup>6</sup>
- Transportation has become the biggest source of GHG emissions in Ontario.<sup>7</sup>

## RECOMMENDED AREAS OF CONSULTATION AND INQUIRY

- Determine the total amount of licensed supply in Ontario's 5000-plus pits and quarries.
- Propose criteria and processes for determining and demonstrating the need for new gravel mining sites.
- Define limits on 'virgin' aggregate extraction, and set targets for aggregate reprocessing in order to ensure sustainable management of the finite gravel resources in Ontario.
- Propose revisions to application procedures which fully honour Indigenous Nations' treaty rights.
- Recommend updated policies and restrictions for gravel mining below the water table to reflect current groundwater sciences.
- Propose methods which increase the weight given to municipal and community perspectives in gravel mining decisions.
- Recommend approaches to ensure that gravel mining sites are not allowed to transform themselves in significant ways after initial approval. This would include changes to progressive or final rehabilitation plans.
- Recommend a fair levy for gravel mining that includes compensation for the full social and environmental costs of its extraction.
- Recommend approaches to gravel mining oversight to ensure full compliance with all regulations and license conditions.

1. Aggregate Resources Statistics in Ontario, Production Statistics annual reports, The Ontario Aggregate Resources Corporation (TOARC)

2. Active aggregate sites and related maximum tonnage

3. Aggregate Resources Statistics in Ontario, Production Statistics annual reports, The Ontario Aggregate Resources Corporation (TOARC)

4. <https://www.inthehills.ca/2011/06/melancthon-mega-quarry-by-the-numbers>

5. Presentation, Ken DeHart, Wellington County Treasurer May 30th 2021 Gravel Watch Ontario

6. <https://www.carbonbrief.org/qa-why-cement-emissions-matter-for-climate-change>

7. Why Are Ontario's GHG emissions going up instead of Down? Environmental Defence, April 21, 2020