

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
17th Floor
777 Bay St.
Toronto, ON
M5G 2E5

July xx, 2020

Dear Minister Clark,

Re. Amendment to the Growth Plan to allow aggregate extraction in threatened and endangered species habitat in the Natural Heritage System

We, the undersigned organizations, are writing to express our strong opposition to the proposed amendment to the Growth Plan for the Greater Golden Horseshoe (GGH) which would end the prohibition on aggregate extraction within the habitat of threatened and endangered species throughout the region's Natural Heritage System.

The Growth Plan was established in 2006 to better manage growth and protect the natural environment across the GGH, one of the fastest growing regions in North America and home to at least a third of Ontario's species at risk. The Plan recognized the fundamental link among quality of life, economic prosperity, a vibrant agricultural landbase and the ecological integrity of the region. After extensive public consultation, the plan was amended in 2017 to include, among other changes, a regional Natural Heritage System offering a higher level of protection for key hydrologic and natural features and areas.

Your ministry is now proposing to undermine this higher level of protection by removing the Growth Plan policy that prohibits aggregate operations and wayside pits and quarries in the habitat of endangered and threatened species throughout the Natural Heritage System (4.2.8.2 a) ii). The rationale provided is that making aggregate resources available close to market is critical to the success of the Growth Plan, and that the change will not impact the Greenbelt.

This argument is unfounded. To be clear, aggregates operations can already occur throughout most of the GGH, including the Natural Heritage System. Given that the purpose of the Natural Heritage System is to protect biodiversity, prohibiting aggregate extraction within the habitats of our most vulnerable plants and animals is the bare minimum that should be required.

Further, to maintain that the change will not impact the Greenbelt ignores the fundamental interconnectedness of natural and hydrologic systems. The GGH Natural

Heritage System was intended to enhance connectivity and support the movement of native plants and animals across the landscape. Therefore it was designed with myriad direct connections to the Greenbelt and with policies to provide consistent, long-term protections similar to those in the Greenbelt based on comprehensive, integrated planning.

The aggregates industry already receives preferential treatment over the protection of our lands, waters and wildlife. When revising the *Aggregate Resources Act* in 2019, the government chose to ignore the advice of the Environmental Commissioner of Ontario who, in 2017, identified the need to undertake further measures to “lighten the environmental footprint of aggregates in Ontario” (*2017 Annual Report: Good Choices, Bad Choices*, p. 175). Instead, the government chose to weaken environmental protections, for example, by stripping away the right of municipalities to use zoning restrictions to safeguard groundwater and to prohibit pits and quarries on Crown land.

Now is not the time to be further dismantling environmental policies, especially those intended to protect species at risk. In May 2019, the United Nations released a devastating report on the state of biodiversity which laid bare the unprecedented decline of biodiversity over the past 50 years: globally, an estimated 1 million plants and animals are at risk of extinction, and the rate of loss is accelerating due almost entirely to human activity. At the time, Sir Robert Watson, then Chair of the UN Intergovernmental Panel on Biodiversity Ecosystem Services, warned that “we are eroding the very foundations of our economies, livelihoods, food security, health, and quality of life worldwide.”

The government should heed this warning - Ontario is not immune to the global trend of ongoing biodiversity loss and its impacts on our well-being. Pressures are particularly acute in the GGH, one of the most biodiverse and heavily developed regions in Canada, where anticipated growth must be carefully managed to sustain the health of our lands, waters and wildlife. We urge you to strengthen rather than weaken our environmental laws and policies and not to proceed with the proposed amendment to allow aggregate extraction in the habitat of threatened and endangered species throughout the region's Natural Heritage System.

Yours sincerely,