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642 Woolwich Street,

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December 15, 2015.

Katie Rosa
Aggregate Resources Officer
Ministry of Natural Resources and Forestry
Policy Division
Natural Resources Conservation Policy Branch
Resource Development Section
300 Water St.
Peterborough, ON
K9J 8M5

Dear Minister,

Re: EBR 012-5444 A Blueprint for Change: A Proposal to Modernize and Strengthen the Aggregate Resources Act Policy Framework

The Christian Farmers Federation of Ontario (CFFO) is an accredited general farm organization operating in the province of Ontario, representing the interests of over 4,000 farm families in the province.

The CFFO has a longstanding interest in the preservation of farmland in Ontario as a valuable natural resource. Farmers, like urbanites, also depend on aggregates for infrastructure and building materials. We support an appropriate balance between the need for aggregates and the importance of protecting or restoring the productive capacity of farmland.

The CFFO recognizes that more intensive development and better transit within cities is an important part of preventing urban sprawl onto valuable farmland. Ensuring that the necessary aggregate materials are available for this type of development is important in an ever-growing Ontario.

It is vital, however, that our high quality class 1-3 farmland and specialty crop land be protected from aggregate extraction, since the long-term benefit of the renewable fertility of the soil is of greater good than the short-term benefit of the non-renewable aggregate that might be extracted. It is also important to protect the food producing capability of the best quality farmland in each county or region, even when that land is not class 1-3.

Where aggregate resources are determined to be suitable for extraction within existing farmland as a temporary use of the land, the CFFO would like to see strong emphasis on rehabilitation to productive farmland after the extraction is completed. Research on



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rehabilitation best practices, and on more effective and cost efficient ways to rehabilitate former aggregate sites back to productive farmland need to be an important part of the work of Aggregate Resources Trust.

Study requirements for applications on agricultural land are vital in order to understand the impacts on the land in question and on surrounding agricultural practices as well. The CFFO is pleased that "A Blueprint for Change" proposes to introduce a requirement for agriculture impact studies on prime agricultural land. These studies should also be required on the best agricultural land in any given county or region, even when that land is not class 1-3 or specialty crop land. Such study requirements, done properly, should be a valuable tool for determining where effective rehabilitation back to agricultural land would be possible, and where extraction of the aggregate would permanently damage or materially diminish the soil capability of the land for agriculture. In cases where the quality of the land would be lost or significantly damaged, aggregate extraction should not be permitted.

Thank you for this opportunity to provide our comments.

Clarence Nywening, President

Christian Farmers Federation of Ontario

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