

To: Mayor and Council
From: Reform Gravel Mining Coalition (RGMC)
Re: Correcting Ontario Stone, Sand and Gravel Association (OSSGA) Misinformation
Date: March 21, 2022

The Reform Gravel Mining Coalition recently became aware of a letter sent to Municipalities across Ontario regarding our organization and activities. We are disappointed that an organization such as the Ontario Stone, Sand and Gravel Association would stoop to name calling and fear mongering and we want to take this opportunity to set the record straight.

The March 18, 2022 memo misrepresents the statements of the RGMC. See comparison below between OSSGA claims and RGMC statements (Table 1). The OSSGA also makes claims about aggregate supply and demand that are questionable as they are not based on publicly available authoritative information. The OSSGA also omits information which would provide the reader a more comprehensive understanding of the issue – for example the contribution of the cement industry to the climate crisis. These are also itemized below (Table 2).

A primary purpose of proposing a moratorium, a temporary pause, on new gravel mining approvals is to conduct an independent third-party study of aggregate reserves. This independent study is an urgent priority as there is a finite amount of gravel reserves in Ontario, and gravel is a vital resource which needs to be carefully managed.

OSSGA member James Dick Construction Ltd. is proud of their “300-year resource management plan” indicating that they “consider long-term planning essential for long-term growth — except that in its case the planning horizon stretches three centuries into the future.”¹ It is difficult to reconcile the recurring claims that Ontario is running out of gravel when members of the industry make such statements.

Concerns around gravel mining have been raised for decades. Citizens demand to be protected. Municipalities’ ability to manage this environmentally and socially intrusive industry are increasingly hampered and reduced. We understand that the industry is concerned. Change can be frightening. But we invite municipalities to support the resolution for a moratorium, a temporary pause, on all new gravel mining approvals in Ontario. Let’s stop making the situation worse by continuing to issue new approvals. It is time to chart a new path forward.

Please contact the Reform Gravel Mining Coalition at campaign@reformgravelmining.ca for more information

¹ <https://canada.constructconnect.com/dcn/news/economic/2019/09/aggregate-supplier-plans-300-years-ahead>

Table 1: Corrections to OSSGA Misinformation

OSSGA Claim	RGMC Statement
<i>The industry digs out 13 times more gravel every year than it uses</i>	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. ²
<i>The aggregate industry takes up to 4.6 billion litres of precious water every day.</i>	The provincial government has approved up to 4.6 billion litres of water for daily consumption by the gravel mining industry. ³
<i>The aggregate industry destroys 5,000 acres of land a year.</i>	Gravel mining consumes an average of 5,000 acres of land in Ontario each year. An average of 5,000 acres of land is licensed each year for gravel mining in Ontario. ⁴

Table 2: Gravel Mining in Ontario/ OSSGA Claims vs. Facts

OSSGA Claims	FACTS
It is estimated that the industry has roughly a 10-year supply of aggregate licensed to extract.	This statement is not supported by publicly available data. RGMC's review of NDMNRF (Ministry) data, and The Ontario Aggregate Resources Corporation (TOARC) annual reports does not provide evidence to support the assertion that there are only 10 years of close to market reserves. The OSSGA fact is based on "industry estimates". RGMC cites TOARC data ⁵ .
The Golder/MHBC Supply Demand Study estimated the "amount of 'high' quality reserves is approximately 1.47 billion tonnes"	The OSSGA fails to cite the Golder/MHBC Supply Demand Study reference to the "high degree of uncertainty with this estimate" and the study authors' warning that "the results should not be taken as a very realistic indication of what resource may actually be proven and made available from these licenced sites". ⁶ The reality is that no one knows the true state of aggregate reserves in Ontario.

² Total of maximum extraction limits from the Ministry of NDMNRF Aggregate License and Permit System (ALPS)

³ MOECP Permits To Take Water Database total of active permits issued for Pits and Quarries Dewatering and Aggregate Washing

⁴ <https://toarc.com/production-statistics/>

⁵ <https://toarc.com/production-statistics/>

⁶ Golder MHBC Supply and Demand Study Executive Summary 2016

OSSGA Claims	FACTS
Ontario will require nearly 4 billion tonnes of aggregate over the next 20 years to meet the needs of citizens and the additional 5.3 million people that will call Ontario home. That is estimated to be 192 million tonnes of aggregate per year.	In the last 20 years average gravel consumption has decreased while the population of Ontario grew by 3 million people in that same period. • The average annual consumption of gravel from 2001 – 2010 was 168 MT per year. • From 2011 – 2020 it was 157 MT / year.⁷ • Ontario's population increased from 12M to 15M an increase of (25%) in the last 20 years.
It currently takes an average of 10 years to apply for and receive a new license.	There is no publicly available data to support this claim. The application process for new gravel mining approvals has a two-year time limit on it. Additional delays are often a result of decisions and choices made by the applicants.
The aggregate industry is not a significant contributor of GHG emissions	The cement industry produces 8% of global carbon emissions, as a country it would be the third largest global emitter of CO ₂ . Aggregate is the feedstock to cement production.
With respect to the amount of new land that is excavated every year – the average for the past 10 years as reported in The Ontario Aggregate Resources Corporation annual production report is approximately 2600 acres per year. An average of 2000 acres per year is rehabilitated for a total net new disturbed area of 600 acres.	The publicly available data on excavation over the long term does not support this claim. TOARC data indicates that the acres under licence for gravel extraction have increased from 221,000 acres in 1998 to 333,000 acres in 2020, an increase of 112,000 acres or almost 5,000 acres per year.⁸ TOARC data indicates the total disturbed area has increased from 50,000 acres in 1998 to 83,000 in 2020, an increase of 33,000 acres or 67%.⁹ The acres scarred by gravel mining in Ontario is increasing each year, rehabilitation is not keeping up.

⁷ <https://toarc.com/production-statistics/>

⁸ <https://toarc.com/production-statistics/>

⁹ <https://toarc.com/production-statistics/>