

August 25, 2020

Dear Ms. Nheiley, Mayor Meed Ward, Council Members and Halton Region Chair Carr,

[BurlingtonGreen Environmental Organization](#) opposes the [Nelson Aggregates quarry expansion application](#) and we ask the City of Burlington Council to deny this attempt by Nelson Aggregates to further encroach on Burlington's section of [Ontario's Green Belt](#), thereby putting at risk our City's portion of the important [Unesco World Biosphere Reserve](#). Our beautiful escarpment is home to a diversity of species (including the at-risk Jefferson salamander), vital farmland, valuable parklands and conservation areas and important aquifers (water sources). It is incumbent upon the residents of Burlington, as represented by our City Council, to put the long-term future of our habitat, the lands that have been entrusted to us to conserve for future generations and the quality of life in Burlington, ahead of one company's short-term profits.

Since 2007, BurlingtonGreen has worked with the community through advocacy, action and awareness to protect the environment, mitigate climate change and to create a healthier, more environmentally responsible Burlington. Together with other environmental advocacy organizations and engaged residents, we strive to protect what we have and reverse the damage caused by human activity while there is still time. To date we have advocated on more than 110 environmental issues including those of quarry expansions in our municipality.

In our May 2019 submission to Ontario's Environmental Registry in response to the Government of Ontario's Aggregate Reform Initiative, BurlingtonGreen contended that the Aggregate Resource Act must be amended such that it is not able to override environmental protection afforded by other legislation such as the Green Belt Plan, and that furthermore, measures to ensure adequate replacement of any lost tree canopy be included in the planned activity as part of the requirement for approval of new or expanded aggregate activities. Far from categorizing these measures as 'red tape' – a term cited by the current government to justify removing or weakening legislation designed to ensure a thorough environmental assessment of the impact of economic activity, as mandated in Ontario's Environmental Bill of Rights – we view them as vitally necessary elements to achieving a successful and efficient aggregate industry in Ontario that operates without compromising ecological sustainability in the broadest sense.

BurlingtonGreen recognizes the contribution of the aggregate sector to Ontario's economy and understands the need to ensure this industry is able to meet the needs of the construction sector that is responsible for building and maintaining our roads, schools, hospitals, commercial and industrial structures and residences; in short, much of the physical infrastructure on which our society depends. At the same time, the climate crisis, outlined in the Intergovernmental Panel on Climate Change's (IPCC) [latest report](#), together with what scientists are calling a sixth mass extinction event¹ caused by human activity that threatens global biodiversity, means that it is critical that we ensure the need of the

¹ <https://www.businessinsider.com/signs-of-6th-mass-extinction-2019-3>

aggregate sector for growth is governed within the parameters of responsible environmental stewardship in order to achieve a truly sustainable model for this sector.

In the case of Nelson Aggregate's proposed expansion, the company's contention that more aggregate material must be extracted to support industry demand rings hollow. To quote [Gravel Watch Ontario](#): "Thus far no crisis of aggregate supply has occurred in Ontario. While numerous reports have been written on the subject of the aggregate supply in Ontario over the years, all of the studies reviewed highlight that the available data is limited. While the demand side of aggregates can be informed by the level of consumption, the understanding of the reserves of this resource whether licenced or not is limited. Broad estimates are typically used in the studies leading to best guess conclusions. The behaviour of the aggregate marketplace is certainly not indicating that any widespread shortage of supply exists."

Furthermore, there are already numerous licensed quarries in the ecologically sensitive backbone of the Niagara Escarpment. Halton Region alone has 22 active pits and quarries², extracting an average of 7 million tonnes of aggregate per year³, one of the largest aggregate mining municipalities in Ontario. And based on the licences already granted to existing Halton quarry sites, these operations are permitted to extract a combined **unlimited** amount of aggregate (some quarry sites have annual limits, while others do not).⁴

Another argument against the Nelson quarry expansion, or indeed, any quarry expansion for that matter, is the significant under-utilization of recycled aggregate material. And while "[r]ecycled materials have played an increasing role, at about seven per cent of supply in the past 10 years (up from about four per cent in the early 1990s)⁵", there is ample opportunity to ramp up the conversion of recovered aggregate material through effective recycling processes into usable material for new building and paving projects. In fact, investing in aggregate recycling plants could form part of a green economic recovery plan to help generate new sustainable economic activity in Ontario following the devastation of the coronavirus pandemic.

The current climate crisis demands that an urgency and a climate lens be applied to decision making at all levels of government, and that includes shifting away from the prioritization of aggregate land use designation and prioritizing other land uses that advance our climate change mitigation efforts. But in the end, the most important question we must ask ourselves, as Burlingtonians, is what kind of Burlington do we want to pass on to future generations? Will our children and grandchildren feel proud of the way our generation stepped up to the challenge of climate change and acted as champions of a fast-disappearing richness of biodiversity, irreplaceable green spaces and waterways, and fertile farmland, or will they blame us for letting them and Burlington down, by allowing ourselves to be swayed by short-term thinking and arguments based on a narrow sector of economic activity. Surely together we can find a better way to build our community than digging up yet more of our escarpment

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<http://sirepub.halton.ca/councildocs/pm/21/Oct%204%202017%20Planning%20and%20Public%20Works%20LPS6917%20State%20of%20Aggregate%20Resources%20within%20Hal%20Attachment%201%20to%20LPS6917%20State%20of%20Aggregate%20Resources%20Reportrev%20Jul%2027pdf%2012443.pdf>, p. 1

³ Ibid, p. 6

⁴ Ibid, p. 5

⁵ <https://files.ontario.ca/environment-and-energy/aggregates/aggregate-resource-in-ontario-study/286996.pdf> p.

lands. The City of Burlington and this Council have the responsibility to weigh both current and future needs, and we urge you to act in accordance with your own Strategic Plan and Climate Action Plan. The decision you make on this issue will send a strong message to the aggregate community and the residents of Burlington on what is truly important to our community. Say no to this quarry expansion, and yes to a greener, healthier city that is doing its part to protect our local biosphere and create a better, more sustainable future for Burlington.

Respectfully,

The Advocacy Team
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cc:
CORE of Burlington Inc.
PERL (Protecting Escarpment Rural Land)