

## Comments on Mapleton ZB 2015-04

The Wellington Federation of Agriculture (WFA) represents the interests of nearly 1,400 farm businesses across the county. These businesses need aggregate to grow and expand and these businesses need well maintained municipal roads. However, these needs must be balanced against the need to protect prime farmland – a fundamental resource for our continued food security.

The existing pit appears on the Ontario government website as Site 5686: a Class A Licenced pit with a maximum annual tonnage of 30,000, a licenced area of 16.61 hectares operating under the client name, Moorefield Excavating Ltd. The predominant land use surrounding the site is agriculture.

The WFA would encourage the maximum use of aggregate resources that will still allow the eventual rehabilitation of sites back to viable agriculture. A genuine effort to recycle products that could replace virgin aggregates and reduce the need for future pits should be encouraged. To assist in that effort the WFA would challenge Mapleton Township to seriously consider the use of recycled aggregate wherever possible.

The WFA is concerned about the recycling of used asphalt in a site that very likely has a high potential for ground water contamination. The fact that a note-worthy legal battle over adverse effects of asphalt took place in Mapleton Township should be of concern to all involved in this decision. The defense that environmental damage was not “foreseeable” may not be available to this generation of decision makers. The Environmental Farm Plan has trained a generation of farmers to constantly work to be better stewards of water quality. Recycling asphalt close to the water table flies in the face of what most Wellington farmers would consider environmental common sense.

The WFA assumes that the applicant is making this request for changes to zoning for the reasons stated and not as an avenue to avoid rehabilitation of the site. The history of aggregate site rehabilitation in Ontario encourages this level of cynicism. The Canadian Environmental Law Association in its May 2012 submission to the Standing Committee on General Government on the Aggregate Resources Act did an interesting calculation. The calculation identified 6,900 abandoned pit and quarry sites in Ontario and estimated the area involved and the financial resources currently made available to rehabilitate sites. The number of years required to rehabilitate the

current number of abandoned pits and quarries was estimated in the range of 223.4 to 335 years. The aggregate industry needs to improve its record and do a better job of progressive rehabilitation back to viable agriculture.

The past is not positive when it comes to loss of prime farmland to the aggregate industry. The future can be different with better conservation of the aggregate resource and the adoption of higher industry standards. WFA is encouraged that some initiatives are taking steps in this direction. The Cornerstone Standards Council is actively working to bring a Responsible Aggregate Standard to the industry. While not a perfect resolution to the loss of prime farmland to the aggregate industry this is a step towards better conservation of both resources.

For more information contact:

Gord Flewwelling, President  
519-323-9953  
[gflewwelling@gto.net](mailto:gflewwelling@gto.net)

Lisa Hern, WFA Secretary Treasurer  
RR 2, Kenilworth, ON N0G 2E0  
519-848-3774  
[jlh@explornet.ca](mailto:jlh@explornet.ca)

Sources:

1. CELA submission  
<http://www.cela.ca/publications/submissions-aggregate-resources-act>
2. Cornerstone Standards Council:  
<http://www.cornerstonestandards.ca/>
3. OFA submission:  
<http://www.ofa.on.ca/issues/submission/Standin-g-Committee-on-General-Government-Aggregate%20Resources%20Act>