



RESIDENTIAL AND
CIVIL
CONSTRUCTION
ALLIANCE OF
ONTARIO

Constructing Ontario's Future

Dear Member of Provincial Parliament:

Re: Excess Construction Soils – Call to develop Best Management Practices

The Residential and Civil Construction Alliance of Ontario (RCCAO) is composed of management and labour groups that represent a wide spectrum of the Ontario construction industry. An important goal of RCCAO is to work in cooperation with governments and other stakeholders to offer realistic solutions to a variety of infrastructure and public works challenges that we face. One such issue relates to the complexities of moving excess soils generated from construction projects: municipal, provincial and private.

The attached **full page ad** appears in the March-April 2012 edition of ReNew Canada magazine. It is meant to illustrate through a sample of three construction projects (one institutional and two in the civil construction sector) that soil transport and disposal costs represent a significant share of the capital value of infrastructure projects. In these three 2011 projects, **soil movement costs represent between 5% and 16% of the capital cost of infrastructure projects**. Contractors have indicated to us that over the past two years soil management costs have increased significantly. **Based on the lack of disposal space and other regulatory barriers we project that double-digit increases will occur over the next few years.**

Many industry partners, led by RCCAO, continue to pragmatically address infrastructure-related issues involving excess construction soil handling barriers and the development of sound, creative, made-in-Ontario solutions based on current global best practices. RCCAO met with Environment Minister Jim Bradley in early February and we stressed the urgency of appropriate soil movement protocols in light of the impact on provincial (e.g., highways and Metrolinx transit projects) and municipal infrastructure projects to be delivered in the future. We pointed out that by not implementing clear rules, there could be more instances of illegal dumping – something that we definitely do not condone. We also indicated that the Best Management Practices approach, as currently drafted by MOE, would not work for the vast majority of construction projects.

Given the large number of parties involved, excess construction soil solutions will have to be accomplished collaboratively by engaging both private and public stakeholders embracing required changes that will result in the best possible solutions.

As this is a complex process to address through regulations, **there is a pressing need in the short term to develop an initial Best Management Practices (BMP) approach** as a workable blueprint to support the required policy and regulatory changes needed in Ontario in the longer term. While MOE has been developing a BMP for large commercial projects in the province this is not well-suited to the

thousands of small to medium-sized infrastructure projects that are started each year in Ontario. For example, having two Qualified Persons and a consultation process for the movement of excess soils would be impractical, cause delays and add unnecessarily to the cost of projects. To be workable, best practices will have to be compatible across all excess construction soil aspects including generating projects, transportation, receiving locations and fit with local community operations and sound procurement practices.

The development of best practices will not only encourage innovation but also recognize that real risk-based approaches are necessary to ensure that there are no unacceptable adverse impacts. RCCAO envisions that there may be a need to pilot test soil management practices to determine whether proposed solutions are workable and practical. In addition, flexibility will be important to meet unique projects and situations.

We look forward to your support and suggestions on ways to better address excess construction soil management in Ontario. In this way, a greater portion of the hundreds of millions of dollars that are now being devoted to moving excess soils each year can be redirected to more productive uses – to actually investing in buildings and infrastructure such as transportation projects and water/sewer and other utilities.

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