



April 4, 2025

Hon. Todd McCarthy
Minister of Environment, Conservation and Parks
Government of Ontario
777 Bay Street, 5th Floor
Toronto, Ontario M7A2J3

Sent electronically

Dear Minister McCarthy:

On behalf of the Residential and Civil Construction Alliance of Ontario (RCCAO), we would like to extend our sincere congratulations on your re-election and re-appointment to Cabinet as Minister of Environment, Conservation and Parks.

As you know, RCCAO is a unique alliance composed of management and labour groups that represents a wide spectrum of the Ontario construction industry. RCCAO's goal is to work in cooperation with government and related stakeholders to offer realistic solutions to a variety of challenges facing the construction industry and which also have wider societal benefits.

Our membership includes the Greater Toronto Sewer and Watermain Contractors Association; Heavy Construction Association of Toronto; International Union of Operating Engineers, Local 793; Joint Residential Construction Association; LiUNA Local 183; Ontario Association of Foundation Specialists; Ontario Formwork Association; and Toronto and Area Road Builders Association.

RCCAO wants to commend the work you and your government have accomplished to date. The Ontario Government's continued commitment to investing in critical infrastructure is key to meeting the needs of our growing province. That investment, coupled with the meaningful advancement on Highway 413 and the Bradford Bypass, reflects your forward-thinking vision that led RCCAO to endorse the party.

While much has been accomplished, we also recognize that challenges remain, particularly in the current unpredictable economic environment and global uncertainty.

That is why it is critically important that your Ministry:

- **Increase the use of Recycled Aggregates in Infrastructure Projects**

One way to maximize infrastructure investments is by using more recycled aggregates in public works projects, which increases environmental sustainability and lowers overall project costs. The use of recycled aggregates preserves non-renewable resources,

extending the life of existing pits and quarries, and reducing energy consumption and greenhouse gas emissions associated with longer truck hauling of construction material.

The Ministry of Transportation (MTO) has extensive experience using recycled aggregates in 400-series highways, with aggregates used for MTO projects already containing 20 percent recycled crushed aggregates. Properly processed or re-engineered recycled crushed aggregate (RCA) that meets Ontario Provincial Standard Specifications (OPSS) 1010 has proven to be a reliable, high-performance material for use in road construction, as engineered backfill, road base, and shoulders.

Although this provincial standard exists, many Ontario municipalities prohibit or severely limit the use of recycled aggregate in road construction and other public works projects. [Industry strongly supports](#) the use of recycled aggregates in infrastructure projects and will continue to work with provincial and municipal governments to ensure that the benefits of this practice are understood and considered as part of project tendering.

- **Continue Improvement to the Management and Reuse of Excess Construction Soils**

Regarding excess construction soil, RCCAO [commissioned research](#) has found that almost 26 million m³ of excess soil is being generated annually in Ontario from both public and private sector construction projects. This is equivalent to completely filling the Rogers Centre in Toronto 16 times. Close to 11 million m³ of this 'clean' soil is generated from municipal and other infrastructure projects. RCCAO has worked with industry and government to promote the environmentally responsible and beneficial reuse of excess soils in Ontario. We look forward to continued engagement on this file as further amendments to Ontario's excess soil regulations are enacted.

- **Continue to reform and streamline the Municipal Class Environmental Assessment (MCEA) process**

RCCAO's [commissioned reports on MCEAs](#) found that the process resulted in delays of more than 26 months for municipal infrastructure projects, including expansion of sanitary sewer systems, widening of municipal roads, replacement of bridges or the establishment of new water treatment plants. Part of the delays was attributed to the scope creep when more requirements were being added to the process, but also because of delays and appeals under the Part II Order process.

Studies and reports associated with such environmental assessments can add up to 10% or more to the capital cost of the proposed project. RCCAO is pleased that, in a testament to the serious implications of the time and cost delays associated with the MCEA process, the government has been working to modernize the Environmental Assessment (EA) process. As part of the modernization work, RCCAO would urge you

to ensure that the amendments to the various class EAs, including MCEAs, are approved as quickly as possible.

We look forward to working with you in your new portfolio. We would welcome the opportunity to meet with you as we continue our partnership and collaboration with your ministry to work together to build a stronger, more connected Ontario.

Sincerely,



Nadia Todorova
Executive Director

Copy to:

Brock Hamley, Chief of Staff, Minister's Office, Ministry of Environment, Conservation and Parks

Amanda Brodhagen, Deputy Chief of Staff and Director of Communications, Minister's Office, Ministry of Environment, Conservation and Parks

Sydney Pothakos, Director of Policy, Minister's Office, Ministry of Environment, Conservation and Parks

Sebastian Bonham-Carter, Director of Stakeholder Relations, Minister's Office, Ministry of Environment, Conservation and Parks