



June 22, 2021

The Honourable David Piccini
Minister of the Environment, Conservation and Parks
777 Bay Street
College Park, 5th Floor
Toronto, ON M7A 2J3

Sent electronically

Dear Minister Piccini,

Congratulations on your recent appointment as Minister of Environment, Conservation and Parks.

As you may know, the Residential and Civil Construction Alliance of Ontario (RCCAO) is a unique alliance of key labour and management stakeholders derived from the residential and civil construction sectors. A primary RCCAO focus since our inception has been the importance of investing in core public works – from transit and water systems to roads and bridges –and doing so smartly and efficiently for taxpayers and daily users of infrastructure.

RCCAO commissions independent research into the issues facing not only our industry, but Ontario society. We have commissioned 58 reports to date, which seek evidence-based solutions on infrastructure topics such [modernizing the municipal class environmental assessment process](#), [responsibly managing excess construction soil](#) and [improving water distribution systems](#).

There are two main issues that we have been working closely with your Ministry on – reforming the Municipal Class Environmental Assessment (MCEA) and improving the management of excess construction soil.

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.

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 are pleased by the progress that the government and your Ministry have made on both files over the last few years. There have been positive developments in terms of modernizing aspects of both issues, which are critical to the infrastructure development process in Ontario. RCCAO will continue to engage with your Ministry as work on new regulations and legislative amendments for MCEA and excess construction soil management are undertaken.

We enjoyed a productive relationship with your predecessor and his staff, and we look forward to continuing the positive momentum with you and your team. Please let us know when a meeting can be set up so that we can discuss these issues in more detail.

Sincerely,

Nadia Todorova
Executive Director

Peter Smith
RCCAO Board Chair

Copy to:
Jonathan Ricci, Manager of Stakeholder Relations and Executive Assistant to the
Parliamentary Assistant
Greater Toronto Sewer and Watermain Contractors Association
Joint Residential Construction Council
LiUNA Local 183
Ontario Formwork Association
Toronto and Area Road Builders Association