



RESIDENTIAL AND  
CIVIL  
CONSTRUCTION  
ALLIANCE OF  
ONTARIO

**Constructing Ontario's Future**

September 25, 2023

Hon. Andrea Khanjin  
Minister of the Environment, Conservation and Parks  
Government of Ontario  
777 Bay Street College Park, 5th Floor  
Toronto, Ontario M7A 2J3

*Sent electronically*

Dear Minister Khanjin:

On behalf of the Residential and Civil Construction Alliance of Ontario (RCCAO), we would like to extend our sincere congratulations on your appointment to Cabinet as Minister of the 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 Formwork Association; and Toronto and Area Road Builders Association.

There are several environmental issues that are of particular importance for RCCAO and our members, including reforming the Municipal Class Environmental Assessment (MCEA) process, improving the management of excess construction soil, and continuing the use of recycled crushed aggregates in infrastructure projects.

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.



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Regarding excess construction soil, RCCAO [commissioned research](#) has found that almost 26 million m<sup>3</sup> 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 m<sup>3</sup> 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 that file as further amendments to Ontario's excess soil regulations are expected.

Recycled crushed aggregate (RCAs) are fragments of concrete derived from demolished projects that can be used to create new infrastructure like roads, sidewalks, airfield facilities and other engineering projects. Using recycled materials is not only better for the environment but can also significantly lower overall project costs without compromising quality and durability. The Government of Ontario can leverage its positive experience using RCAs in 400 series highways to support municipalities in delivering critical infrastructure projects with lower greenhouse gas emissions and price tags across the province.

We enjoyed a productive and collaborative relationship with your predecessor and his staff, and we look forward to continuing the positive momentum with you and your team. I look forward to meeting in the coming days and discussing industry's challenges and opportunities in more detail.

Sincerely,

Nadia Todorova  
Executive Director

Copy to:

John Yakabuski, Parliamentary Assistant to the Minister of the Environment, Conservation and Parks

Tory Pearson, Director of Stakeholder Relations, Minister's Office, Ministry of the Environment, Conservation and Parks