



July 14, 2022

Hon. David Piccini
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 Piccini:

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 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.

Two issues continue to dominate our engagement with your Ministry – reforming the Municipal Class Environmental Assessment (MCEA) process 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.

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. The *More Homes, More Choice Act* in 2019 eliminated issues related to low-risk projects and in 2020, the COVID-19 Economic Recovery Act addressed Part II Order 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. For example,



work to develop regulations that will set out the projects that will be subject to the Streamlined Environmental Assessment provisions of the amended Act and the process these projects must follow, should be finalized speedily. Creating a consistent, clear and streamlined environmental assessment process will eliminate duplication, provide clear expectations regarding consultations and define timelines for critical infrastructure work while maintaining environmental protections.

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. The [recent pause](#) in the implementation of Ontario Regulation 406/19 provides an opportunity for the Ministry to address the concerns of inconsistent implementation of excess soil management requirements across the province, ambiguous and confusing responsibilities and requirements, and costs associated with these undertakings. Addressing these concerns will help to improve accountability around soil reuse and disposal, which will create a more even playing field for construction companies bidding on projects across Ontario.

We urge the Ontario Government to expedite the process to move forward with these important initiatives as quickly as possible to avoid costly delays. RCCAO members are ready to work to build critical infrastructure and housing to realize the prosperous future for the people of Ontario. We would appreciate the opportunity to meet you at your earliest convenience to discuss our continued collaboration.

Regards,

Nadia Todorova
Executive Director

Copy to:

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

Philip Welford, Chief of Staff, Minister's Office, Ministry of the Environment, Conservation and Parks

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