



January 7, 2020

The Honourable Jonathan Wilkinson
Minister of Environment and Climate Change
House of Commons
Ottawa, Ontario K1A 0A6

Submitted electronically

Dear Minister Wilkinson:

Congratulations on your recent appointment as Minister of Environment and Climate Change.

The Residential and Civil Construction Alliance of Ontario (RCCAO) is a labour-management organization that advocates on behalf of tens of thousands of hard-working men and women who are employed in the construction industry.

On behalf of our member organizations, RCCAO commissions independent research into issues facing not only our industry, but also Ontario society. Our research and advocacy efforts have earned the respect of many for their objective, evidence-based findings and constructive recommendations. We have commissioned 52 reports to date, which seek solutions on topics ranging from mitigating traffic [congestion](#) to responsibly managing excess construction [soil](#).

RCCAO's estimates that close to 26 million m³ of excess construction fill is generated annually across Ontario from both public sector and private sector projects. To put this into perspective, this amount of soil would fill the Rogers Centre to the top of the roof 16 times. A joint report released in 2016 reveals that GHG emissions can be significantly reduced by beneficially reusing these clean soils instead of transporting (and dumping) soil hundreds of kilometres from project sites.

A primary RCCAO focus since our inception has been the importance of investing in public infrastructure – from transit and waterworks to roads and bridges – and doing so smartly and efficiently for taxpayers and daily users of infrastructure. On topics such as gas tax [revenues](#), we have identified ways for governments to supplement these revenue tools by focusing on road pricing and innovative parking charges. This should also be something that the federal government focuses on. Not only is a long-term reliance on gas tax revenues a risky proposition, it also presents a contradiction as it is at odds with a transition to a low carbon economy.

One of several key environmental issues that the RCCAO has focused on includes Municipal Class Environmental Assessment (MCEA) reform. RCCAO has commissioned extensive research on the topic of [improving MCEA processes](#). In our [2010 report](#), "Are Ontario's Municipal Class Environmental Assessments Worth the Added Time and Cost?", it was found that it took about 19 months to go through the Class EA process. An [updated report](#) in 2014 revealed that it was taking longer – almost 27 months on average for the same class of local projects. While MCEA projects are not the purview of the federal government, we thought you should be aware of our efforts to implement process efficiencies while not diminishing environmental outcomes. We are supportive of efforts to improve federal EA processes for larger projects.



RCCAO is currently part of an initiative to form a business coalition to advocate for consistent, effective and efficient climate policy. This will help establish a voice that will call on governments to invest in mitigation, adaptation and resilient infrastructure to help create greater consensus that will lead to increased policy certainty, investment and innovation. Simply put, if we can define the rules of the road, business can better plan, adapt and innovate.

We would be pleased to meet with you to discuss in more detail the work that RCCAO has done on environmentally related issues and how industry and government can work collaboratively to ensure that environmental consideration complement infrastructure development in Canada.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andy Manahan', is positioned below the word 'Sincerely,'.

Andy Manahan
Executive Director