



November 12, 2021

Resource Productivity & Recovery Authority
4711 Yonge Street, Suite 408
Toronto, Ontario M2N 6K8

Submitted electronically

RE: Proposed 2022 registry fees for excess soil

The Residential and Civil Construction Alliance of Ontario (RCCAO) is pleased to provide feedback regarding the proposed 2022 registry fees for the excess soil registry. We recognize that these fees which registry users will pay, will cover the Resource Productivity & Recovery Authority's (RPRA) costs for building, maintaining, and operating the excess soil registry.

While RCCAO considers the proposed fees to be reasonable, we would emphasize that in true cost-recovery manner, RPRA should be re-evaluating its fee structure every year for the first five years to ensure that the Authority is only collecting what it needs. The fee structure should be evaluated in practice against the Authority's financial assumptions. We would caution that fees should be kept to a minimum and only serve the cost-purpose of operating the registry.

RCCAO would also advise that the Authority take a prudent approach when considering any fee increases in the future. As an administrative delegated authority that is not responsible for compliance and enforcement activities under the Excess Soil Regulation, we would expect fees to remain stable and predictable year-over-year.

Lastly, as this registry will be a new regulatory component of the excess soil management, RCCAO strongly urges the Authority to implement a comprehensive educational stakeholder outreach campaign to ensure that industry is well versed in the operation and usability of the registry.

The movement and management of excess construction soil is an important element in infrastructure work and as such RCCAO will continue to remain engaged on this file. We look forward to continuing working together with the Authority and the Ministry of Environment, Conservation and Parks as the new phase of the excess soil regulations roll out in 2022.

Regards,

A handwritten signature in black ink, appearing to read 'Nadia Todorova', is positioned below the 'Regards,' text.

Nadia Todorova
Executive Director

Copy to:
Connor Lund, Policy Advisor, Minister's Office, Ministry of Environment, Conservation and Parks