

Dear Ms. Simpson,

Following is supplemental information to my response during the AGFO Hearing on September 22, 2022, regarding Senator Simons' question concerning subsurface mineral or oil/gas rights where proper remediation/reclamation does not follow extraction.

I had personal experience with gravel extraction on my farm. At about 1990, the Ontario Government turned management of pits and quarries over to the Aggregate Industry to self-regulate. Fees were collected for each tonne of aggregate extracted, some of which was held in trust to be applied to site reclamation when aggregate extraction was concluded. My observation is that reclamation does not happen. By design, extraction is never completed. As a result, we have unreclaimed pits and quarries across Ontario because self-regulation does not work. Too often, the topsoil from these sites has disappeared. I suspect that strip-mined sites are similar.

Would it not be reasonable to require that all topsoil from urban, industry and infrastructure "development" projects to be applied to sites that have been highly eroded by tillage or disrupted through extraction of natural resources; i.e., oil, gas, coal, mineral fertilizers, sand, gravel or stone?

Applied topsoil to a disrupted site would (and should) become part of the cost of "development"; i.e., the removal of agricultural land from our food production resource.

This would go a long way toward causing serious consideration about what land should be taken out of agriculture. When land is taken out of agriculture it would help to ensure that we do not lose overall foodland productivity or carbon capture. If or where the reclamation (replacement of topsoil) involves soil that is not suitable for safe food production, then those reclaimed lands could be reforested and add value to the landscape while sequestering carbon from the atmosphere.

Because resource extraction is Provincial domain, Federal carbon management programs might be the lever that brings provincial cooperation on this serious matter.

Best regards,

Don Lobb, P.Ag.(Hon)