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“The Emperor has No Clothes” Cornerstone Standards Program Fails to Deliver

Gravel Watch Ontario continues to warn all stakeholders not to take the promises of the Cornerstone Standards Council’s Responsible Aggregate program at face value. A review of the program continues to highlight major deficiencies and disappointments. Despite what might be promised, the certification program fails to deliver. Just as the parable teaches us to be wary of false promises, we may find that the “emperor has no clothes”.

Gravel Watch Ontario representatives served on both the Standards Development Panel and the Cornerstone Standards Council (CSC) board until 2013 when the organization withdrew over concerns regarding the internal CSC organizational governance and the resulting standards.

The Cornerstone Standards Council Responsible Aggregate Standard (the “Standard”) is described as a program for “recognizing and rewarding both public and privately owned aggregate operations that go beyond regulatory compliance and adopt industry best practices”.

Unfortunately, the standard is void of any normative requirements or specific targets on some of the most relevant operational issues for aggregate sites. There are no operational targets set for noise, dust, vibration, ambient light, water consumption, etc. Principle 5 of the standard when addressing these issues has the following requirements:

“When addressing adverse environmental impacts ... the applicant implements (consistent with the scale and intensity of the operation) an Environmental Management System or a series of Standard Operating Procedures that are **consistent with or exceed** existing regulatory requirements...”

The standard has no requirement to exceed regulatory requirement, being consistent with is sufficient. There is no reference to adopting industry best practices and there is not even a reference to current industry norms so certified sites may in fact be performing below established industry benchmarks.

Equally concerning, the CSC auditors spend very limited time on site, typically a day or two, and take no independent measurements of environmental factors. The environmental audit process becomes a paper exercise without any independent objective evaluation of the factors that the standards claim to insure.

Even when the CSC program identifies deficiencies, sites can be certified with the assumption that they will become compliant in the future. For a recently evaluated site “seven minor non-conformances with CSC's Responsible Aggregates Standard were identified” yet the site was granted certification. To highlight just one of those non-conformances, as documented in the CSC audit report:

“(The site) has not demonstrated full compliance with the requirements of the:

- Approved Site Plan (01/12/99);
- Ontario Regulation 127; and
- The Ontario Municipal Board Recommendations (OMB)”

Site plans are the central regulatory instrument for aggregate sites. The plans detail most, if not all, of the operational aspects of the site. Ontario Regulation 127 deals with the Airborne Contaminant Discharge Monitoring and Reporting, and it is unclear what OMB recommendations are being referred to. The CSC audit conclusion was that “this non-conformance is not consider major”.

Non-compliance with the site plan is a Provincial regulatory matter, as is non-compliance with airborne contaminant monitoring and reporting requirements. CSC observed non-compliance with these regulatory requirements yet still allowed a site to be certified. How can the CSC program be delivering on its goal to “recognize and reward both public and privately owned aggregate operations that go beyond regulatory compliance and adopt industry best practices”?

Despite what the proponents of this system claim, despite the vision portrayed in the CSC marketing material, the facts tell a different story. Just as the child’s parable teaches us to be wary, else we may find that the emperor has no clothes.

Gravel Watch Ontario continues to believe in the value that a robust voluntary aggregates standard program could provide. That is why we dedicated over two years of commitment to its development. To deliver on that promise, though, the standards must set a high bar and the enforcement must be rigorous, thorough, and absolute. The current CSC Responsible Aggregates program fails to deliver on those attributes.

Gravel Watch Ontario is a coalition of citizens and non-government organizations, seeking to improve the management of aggregates in Ontario. Gravel Watch Ontario acts in the interests of residents and communities to protect the natural environment, health, safety and quality of life for Ontarians. For more information, visit <http://www.gravelwatch.org>.