

May 27, 2019

Ministry of the Environment, Conservation and Parks (MECP)  
Environmental Policy Branch  
40 St. Clair Avenue West  
10<sup>th</sup> Floor  
Toronto, Ontario  
M4V 1M2

Attention: Sanjay Coelho - Senior Policy Analyst

**Subject: Excess Soil - New Proposed Regulation – ERO Registry #013-5000**

The Association of Professional Geoscientists of Ontario (APGO) was established to protect the public and the natural environment by regulating geoscience practice in Ontario. This mandate is our foremost concern and we appreciate the opportunity to comment on the above-referenced ERO posting.

The APGO has worked with the MECP on this matter for several years and was pleased to participate in the 2014 Excess Soil BMP. We are supportive of the overall Excess Soil Management Framework and recognize the adjustments to the previous ERO Posting #013-2774. In particular, we support those areas of the regulations that allow qualified professionals to exercise reasonable discretion and professional judgment. We also believe that the proposed timeline to implement the framework and regulatory amendments is reasonable.

Thank you for continuing to engage the APGO on this important initiative.

Sincerely,



Zen Keizars, P.Geo.  
President



Ron Ormson, P.Geo.  
Chair, Environment Subcommittee

cc. Tony Andrews – CEO