

Chair  
**Terry Obal**  
Bureau Veritas

**Izzie Abrams**  
Waste Connections

**Robyn Gray**  
Sussex Strategy

**Michele Grenier**  
Ontario Water Works  
Association

**Irene Hassas**  
Aslan Technologies

**Denise Lacchin**  
Golder

**Brent Langille**  
RWDI

**Duncan McKinnon**  
ALS Global

**Brandon Moffatt**  
StormFisher

**Tim Murphy**  
Walker Environmental  
Group

**Sean Thompsom**  
Pisgryph

**Joanna Vince**  
Willms & Shier  
Environmental Lawyers

**Grant Walsom**  
XCG Consulting Ltd.

**Derek Webb**  
BIOREM Technologies

**Agnes Wiertzynski**  
Accuworx

**ONEIA**  
192 Spadina Avenue  
Suite 306  
Toronto, ON M5T 2C2

Executive Director  
**Michelle Noble**

Operations Manager  
**Janelle Yanishewski**

Tel: (416) 531-7884  
[info@oneia.ca](mailto:info@oneia.ca)  
[www.oneia.ca](http://www.oneia.ca)

February 28, 2022

Ian Drew  
Senior Policy Advisor  
Resource Recovery Policy Branch  
Ministry of the Environment, Conservation and Parks  
40 St. Clair Avenue West, 8th Floor  
Toronto, ON M4V 1M2

Submitted via the ERO portal and copy delivered via e-mail to [ian.drew@ontario.ca](mailto:ian.drew@ontario.ca)

**RE: ERO Posting #019-4867 - Environmental Assessment Requirements for Advanced Recycling Facilities Under the Environmental Assessment Act (EAA)**

Dear Mr. Drew,

The Ontario Environment Industry Association (ONEIA) appreciates the opportunity to provide input to the Ministry of the Environment, Conservation and Parks (MECP) proposal to update the environmental assessment requirements for advanced recycling facilities. Members of ONEIA are committed to engaging with governments as they develop policies and regulations that are consistent with our principles of sound science, sound environment, and a sound economy.

ONEIA has reviewed the published materials, attended the webinar, and participated in a meeting with MECP staff to review the proposal. We understand and fully support modernizing regulations and reducing red tape to support business investment in Ontario. However, we are extremely concerned with the reach that this proposal encompasses, specifically the contemplated inclusion of anaerobic digestion technologies (AD) into a thermal treatment regulation.

While we feel that the proposal represents advanced recycling of wastes such as plastics and chemicals utilizing new thermal treatment technologies, we do not support the application of this proposal to include AD technologies, which are, at their core, biological treatment processes. A regulatory framework for AD already exists, and we strongly believe a thermal treatment classification will unintentionally diminish the desire of AD developers to invest in Ontario.

We recommend that this proposed regulation explicitly exclude AD. At the same time, we recommend the development of a clear delineation for organics recovered from residential, commercial, institutional, industrial, and agricultural sources to reflect the unique treatment technologies and applications available for different materials. Linking AD, regardless of whether it is a mesophilic or thermophilic process or a technology like plug flow, continuously stirred, and others under the legacy term "Energy-From-Waste (EFW) / Thermal Treatment", will impede the opportunity for Ontarians to accrue AD's unique benefits and value in the development of circular economy solutions.

We welcome the opportunity to discuss our position and recommendations further. Please contact our office at info@oneia.ca or at (416) 531-7884 should you have any questions.

Yours truly,

A handwritten signature in black ink that reads "Michelle Noble". The signature is written in a cursive, flowing style.

Michelle Noble  
Executive Director, ONEIA

cc. Charles O'Hara  
Shelly Bonte-Gelok  
Atif Durrani

Ministry of the Environment, Conservation and Parks  
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