

ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 7366-DKFSAL

Issue Date: September 26, 2025

Pefferlaw Peat Products Inc.
1156 Speers Rd, No. 1
Oakville, Ontario
L6L 2X4

Site Location: 21265 Side Road 17
Brock Township, Regional Municipality of Durham
L0E 1E0

You have applied under section 20.2 of Part II.1 of the Environmental Protection Act, R.S.O. 1990, c. E. 19 (Environmental Protection Act) for approval of:

a 9.8 hectare-waste disposal site (processing-composting), serving the Province of Ontario and encompassing the following:

- one (1) composting facility, for receiving and processing the Organic Waste, limited to leaf and yard waste, at the following rates during the phased Site development:
 - o 35,000 tonnes per year in Phase 1
 - o 50,000 tonnes per year in Phase 2
 - o 65,000 tonnes per year in Phase 3
 - o 80,000 tonnes per year in Phase 4
 - o 100,000 tonnes per year in Phase 5
- one (1) irrigation pond to collect stormwater and leachate run-off from the composting facility.

Note: Use of the site for any other type of waste is not approved under this environmental compliance approval, and requires obtaining a separate approval amending this environmental compliance approval.

For the purpose of this environmental compliance approval, the following definitions apply:

"Active Composting" means the phase of the Composting process in which the Organic Waste is subjected to controlled conditions to facilitate thermophilic, aerobic and microbial decomposition;

"Adverse Effect" is as defined in the EPA;

"Approval" means this entire Environmental Compliance Approval document, issued in accordance with the EPA, and includes any schedules to it, the application and the supporting documentation listed in Schedule 1;

"Compost Quality Standards" means the Ministry standards for Compost as set out in the Compost Standards Document;

"Compost Standards Document" means the Ministry's document entitled "Ontario Compost Quality Standards" dated July 25, 2012, as amended and including the following documents to provide operational guidance to accompany the "Ontario Compost Quality Standards":

- a. Guidance for Generators of Category AA, A, and B Compost and the Ontario Compost Quality Standards – Maturity, Effective July 1st, 2015, as amended;
- b. Guidance for Generators of Category AA, A, and B Compost and the Ontario Compost Quality Standards – Foreign Matter, Effective July 1st, 2015, as amended;
- c. Guidance for Generators of Category AA, A, and B Compost and the Ontario Compost Quality Standards – Sharp Foreign Matter, Effective July 1st, 2015, as amended;

"Compost" has the same meaning as set out in the Standards Document. Furthermore, within context of this Approval, Compost also means the Processed Organic Waste, as defined in this Approval, from processing of waste at the Site that has been confirmed to comply with the applicable Compost Standards and for the times that testing is not required, it means the Processed Organic Waste from the approved processing at the Site;

"Composting Facility" means the part of the approved waste disposal site that is used to compost Organic Waste limited to the Leaf and Yard Waste from municipal collection sources;

"Composting" has the same meaning as set out in the Standards Document. Furthermore, Composting must be conducted under controlled engineered conditions designed to decompose and stabilize organic matter. Exposure of organic matter under non-engineered conditions resulting in uncontrolled decay is not considered Composting. Composting process consists of Active Composting and Curing;

"Curing" means the aerobic, microbial degradation process after the Active Composting phase of the Composting process, to produce solid, mature material that exhibits limited biological activity, which has degraded to the point where it can be stored and used without risk of odour and adverse effects, such as risk to plants from residual phytotoxic compounds and which meets the maturity standards;

"Director" means any Ministry employee appointed in writing by the Minister pursuant to section 5 of the Act as a Director for the purposes of Part II.1 of the EPA;

"District Manager" means the District Manager of the local district office of the Ministry in which the Site is geographically located;

"Dust Management Plan" means the dust Best Management Practices Plan as approved by the District Manager, which describes measures to minimize dust emissions from the Site;

"EASR" means the Environmental Activity and Sector Registry;

"EPA" means the *Environmental Protection Act*, R.S.O. 1990, C.E-19, as amended from time to time;

"Feedstock" means the incoming Organic Waste destined to undergo Composting at the Site;

"Final Disposal" within the context of this Approval means land disposal and thermal treatment, both as defined in Regulation 347, and does not include handling, storing, transferring, treating or processing of waste at a land disposal or a thermal treatment site;

"Financial Assurance" is as defined in Section 131 of the EPA;

"Finished Compost" in the context of this Approval, means the Processed Organic Waste, as defined in this Approval, destined for an end use as a Compost and that has been fully processed at the Site and is considered ready for sampling and testing for compliance with the Compost Quality Standards;

"Foreign Matter" within the context of this Approval means materials that include but are not limited to glass, metallic objects, plastic and other foreign objects that are not typically considered naturally occurring;

"Guideline" means the Ministry publication entitled "Guideline for the Production of Compost in Ontario", dated July 2012, or the most recent revision;

"IC&I" means industrial, commercial and institutional;

"Irrigation Pond" means one (1) irrigation pond to collect stormwater and leachate run-off from the Site;

"Immature Compost" within the context of this Approval, means the Processed Organic Waste, as defined in this Approval, which has finished the Active Composting, and was screened, if screening is required, but which does not yet comply with the maturity Compost Quality Standards;

"Laboratory Service Provider" means a laboratory service provider that is accredited by an internationally recognized accreditation body which accredits laboratories under ISO/IEC 17025:2005 *General Requirements for the Competence of Testing and Calibration Laboratories*, as amended from time to time, including the Standards Council of Canada or the Canadian Association for Laboratory Accreditation;

"Leaf and Yard Waste" means the leaf and yard waste as defined in the Ontario Regulation 101/94, as amended, made under the EPA;

"Ministry" means the ministry of the government of Ontario responsible for the EPA and OWRA and includes all officials, employees, or other persons acting on its behalf;

"Odour Management Plan" means the odour Best Management Practices Plan which describes measures to minimize odour emissions from the Site;

"O. Regulation 267" means Ontario Regulation 267/03 made under the *Nutrient Management Act*, 2002;

"Organic Waste Mix" means the mixture of the incoming Organic Waste and the wooden overs from the screening process approved in this Approval;

"Organic Waste" means solid non-hazardous waste derived from plants or animals, including wastes consisting of other compounds of carbon, all readily biodegradable, and limited to wastes listed in Condition 3.2(1) of this Approval;

"Owner" means any person that is responsible for the establishment and operation of the Site being approved by this Approval, and includes Pepperlaw Peat Products Inc., its successors and assigns;

"OWRA" means the *Ontario Water Resources Act*, R.S.O. 1990, c. O.40, as amended;

"PA" means the *Pesticides Act*, R.S.O. 1990, c. P-11, as amended from time to time;

"Pasteurization Phase" means heat treatment phase of Active Composting to inactivate pathogens from the incoming Feedstocks through time and heat treatment pathogens are inactivated to comply with the prescribed limits; ;

"Professional Engineer" means a Professional Engineer as defined within the *Professional Engineers Act*, R.S.O. 1990, c. P.28, as amended;

"Provincial Officer" means any person designated in writing by the Minister as a provincial officer pursuant to Section 5 of the OWRA or Section 5 of the EPA or Section 17 of the PA or Section 4 of the NMA or Section 8 of the SDWA;

"Regulation 347" means Regulation 347 - General - Waste Management, R.R.O. 1990, made under the EPA, as amended;

"Rejected Waste" means the waste that does not comply with the quality criteria required for acceptance at the Site;

"Residual Waste" means waste remaining after processing at the Site and that is destined for Final Disposal or further processing at another approved waste disposal site;

"Sensitive Receptor" means any location where routine or normal activities occurring at reasonably expected times would experience adverse effect(s), from odour or contaminant discharges from the Site, including one or a combination of:

- a. institutional facilities (e.g.: schools, churches, community centres, day care centres, recreational centres, etc.),
- b. other outdoor public areas where there are continuous human activities (e.g.: commercial plazas and office buildings);
- c. outdoor public recreational areas (e.g.: trailer parks, play grounds, picnic areas, etc.), and
- d. private residences or public facilities where people sleep (e.g.: single and multi-unit dwellings, nursing homes, hospitals, trailer parks, camping grounds, etc.);

"Site" means a part of the approved waste disposal site that is considered to be the Composting Facility;

"**Spill**" is as defined in the EPA;

"**SSO**" means the source separated Organic Waste which consists of the Organic Waste, which has been separated at its source of origin by the generator of the waste and including the bags used by the generator to encase the Organic Waste at the source of generation. Within the context of this Approval, SSO means the Organic Waste from municipal organics collection programs;

"**Supporting Documentation**" means supporting documentation listed in the attached Schedule 1;

"**Trained Personnel**" means an employee trained in accordance with the requirements of Condition 12.2 and is knowledgeable through instruction and/or practice and able to carry out any necessary duties;

"**Trucks**" means the Compost truck(s) and the waste truck(s);

"**waste**" within the context of this Approval, it means any material defined as a waste or designated to be a waste under any provincial Act or regulation or any other discarded, unwanted, unsuitable for its original use or purpose (for example off-specification or expired) post-consumer goods, items, materials and managed at the Site and transferred from the Site. Outputs from management of waste at a waste disposal site continue to be considered waste, unless undesignated through a provincial regulation; and

"**Wood**" is as defined in the Compost Quality Standards document.

You are hereby notified that this environmental compliance approval is issued to you subject to the terms and conditions outlined below:

TERMS AND CONDITIONS

1.0 GENERAL

1.1 Compliance

- (1) The Owner shall ensure compliance with all the conditions of this Approval and shall ensure that any person authorized to carry out work on or operate any aspect of the Site is notified of this Approval and the conditions herein and shall take all reasonable measures to ensure any such person complies with the same.
- (2) Any person authorized to carry out work on or operate any aspect of the Site shall comply with the conditions of this Approval.

1.2 Build, etc. in Accordance / Construction

- (1) Except as otherwise provided by this Approval, the Site shall be established, used, operated, maintained and monitored in accordance with the supporting documentation listed in the attached Schedule 1.
- (2) The changes to the Site proposed in the application for the amendment of this Approval and its Supporting Documentation, shall be constructed and the required equipment shall be installed

and must commence operation within five (5) years of issuance of this Approval, after which time the Approval ceases to apply in respect of any portions of the Site not in operation. In the event that the construction, installation and/or operation of any portion of the Site is anticipated to be delayed beyond the time period stipulated, the Owner and/or Operator shall submit to the Director an application to amend the Approval to extend this time period, at least six (6) months prior to the end of the period. The amendment application shall include the reason(s) for the delay and whether there is any design change(s).

1.3 As-built Drawings

- (1) A set of as-built drawings, certified by a Professional Engineer and showing the design of the Site, shall be kept at the Site at all times.

1.4 Interpretation

- (1) Where there is a conflict between a provision of any document, including the application referred to in this Approval and the conditions of this Approval, the conditions in this Approval shall take precedence.
- (2) Where there is a conflict between the application and a provision in any documents listed in Schedule 1, the application shall take precedence, unless it is clear that the purpose of the document was to amend the application and that the Ministry approved the amendment.
- (3) Where there is a conflict between any two documents listed in Schedule 1, other than the application, the document bearing the most recent date shall take precedence.
- (4) The requirements of this Approval are severable. If any requirement of this Approval, or the application of any requirement of this Approval to any circumstance, is held invalid or unenforceable, the application of such requirement to other circumstances and the remainder of this Approval shall not be affected thereby.

1.5 Other Legal Obligations

- (1) The issuance of, and compliance with the conditions of this Approval does not:
 - a. relieve any person of any obligation to comply with any provision of any applicable statute, regulation or other legal requirement; or
 - b. limit in any way the authority of the Ministry to require certain steps be taken or to require the Owner to furnish any further information related to compliance with this Approval.
- (2) Despite an Owner or any other person fulfilling any obligations imposed by this Approval, the person remains responsible for any contravention of any other condition of this Approval or any applicable statute, regulation, or other legal requirement resulting from any act or omission that

caused the Adverse Effect or impairment of water quality.

1.6 Adverse Effect

- (1) The Site shall be constructed, operated and maintained in a manner which ensures the health and safety of all persons and prevents generation of negative environmental impacts including but not limited to dust, odours, vectors, pests, birds, litter, vibration, noise and any other negative environmental effects that may cause an Adverse Effect.
- (2) If at any time dust, odours, vectors, pests, birds, litter, vibration, noise or other such negative environmental effects are generated at the Site and cause an Adverse Effect, the Owner shall take immediate and appropriate remedial action(s) that is/are necessary to alleviate the Adverse Effect, including suspension of all waste management activities and removal of waste from the Site, if necessary.
- (3) The Owner shall take steps to minimize and ameliorate any Adverse Effect on the natural environment or impairment of water quality resulting from the approved operations at the Site, including such steps as accelerated or additional monitoring as may be necessary to determine the nature and extent of the effect or impairment.

1.7 Change of Owner

- (1) The Owner shall notify the Director in writing, and forward a copy of the notification to the District Manager, within thirty (30) days of the occurrence of any change in:
 - a. the ownership of the Site;
 - b. the operator of the Site;
 - c. the address of the Owner;
 - d. the partners, where the Owner is or at any time becomes a partnership and a copy of the most recent declaration filed under the Business Names Act, R.S.O. 1990, c. B.17, as amended, shall be included in the notification; or
 - e. the name of the corporation where the Owner is or at any time becomes a corporation, other than a municipal corporation, and a copy of the most current information filed under the Corporations Information Act, R.S.O. 1990, c. C.39, as amended, shall be included in the notification.
- (2) No portion of this Site shall be transferred or encumbered prior to or after closing of the Site unless the Director is notified in advance. In the event of any change in ownership of the Site, other than change to a successor municipality, the Owner shall notify the successor of and provide the successor with a copy of this Approval, and the Owner shall provide a copy of the

notification to the District Manager and the Director.

1.8 Inspections by the Ministry

- (1) No person shall hinder or obstruct a Provincial Officer from carrying out any and all inspections authorized by the OWRA, the EPA, the PA, the SDWA or the NMA of any place to which this Approval relates, and without limiting the foregoing:
 - a. to enter upon the premises where the approved processing is undertaken, or the location where the records required by the conditions of this Approval are kept;
 - b. to have access to, inspect, and copy any records required to be kept by the conditions of this Approval;
 - c. to inspect the Site, related equipment and appurtenances;
 - d. to inspect the practices, procedures, or operations required by the conditions of this Approval;
 - e. to conduct interviews with staff, contractors, agents and assignees of the Owner; and
 - f. to sample and monitor for the purposes of assessing compliance with the terms and conditions of this Approval or the EPA, the OWRA, the PA, the SDWA or the NMA.

1.9 Information and Record Retention

- (1) Any information requested by the Ministry, concerning the operation of the Site and its operation under this Approval, including but not limited to any records required to be kept by this Approval shall, upon request, be provided to the Ministry in a timely manner and in a format specified by the Ministry. All records shall be retained for two (2) years except as otherwise authorized in writing by the Director.
- (2) The receipt of any information by the Ministry or the failure of the Ministry to prosecute any person or to require any person to take any action, under this Approval or under any statute, regulation or other legal requirement, in relation to the information, shall not be construed as:
 - a. an approval, waiver, or justification by the Ministry of any act or omission of any person that contravenes any term or condition of this Approval or any statute, regulation or other legal requirement; or
 - b. acceptance by the Ministry of the information's completeness or accuracy.
- (3) The Owner shall ensure that a copy of this Approval, in its entirety and including all its Notices of Amendment, and the documentation listed in Schedule 1, are retained at the Owner's office at

all times.

1.10 Financial Assurance

- (1) Within the thirty (30) days from the date of this Approval, the Owner shall submit the Financial Assurance in the amount of CAN\$32,310.06. This Financial Assurance shall be in a form acceptable to the Director and shall provide sufficient funds for the analysis, transportation, Site clean-up, monitoring and disposal of all approved quantities of waste at the Site at any one time.
- (2) A minimum of thirty (30) days before the commencement of the next phase of the Site development, the Owner shall submit to the Director, the required additional Financial Assurance for the costs of the analysis, transportation, Site clean-up, monitoring and disposal of all quantities of approved waste at the Site at any one time, as follows:
 - a. for Phase 2: additional Financial Assurance in the amount of \$13,847.17 to a total Financial Assurance in the amount of \$46,157.23
 - b. for Phase 3: additional Financial Assurance in the amount of \$13,847.17 to a total of Financial Assurance in the amount of \$60,004.40
 - c. for Phase 4: additional Financial Assurance in the amount of \$13,847.17 to a total of Financial Assurance in the amount of \$73,851.57
 - d. for Phase 5: additional Financial Assurance in the amount of 18,462.89 to a total of Financial Assurance in the amount of 92,314.46
- (3) Commencing on August 31, 2030 and at intervals of five (5) years thereafter, the Owner shall submit to the Director, a re-evaluation of the amount of Financial Assurance to implement the actions required under Conditions 1.10(1) and 1.10(2). The re-evaluation shall include an assessment based on any new information relating to the environmental conditions of the Site and shall include the costs of additional monitoring and/or implementation of contingency plans required by the Director upon review of the closure plan and annual reports. The Financial Assurance must be submitted to the Director within ten (10) days of written acceptance of the re-evaluation by the Director.
- (4) The amount of Financial Assurance is subject to review at any time by the Director and may be amended at his/her discretion. If any Financial Assurance is scheduled to expire or notice is received, indicating Financial Assurance will not be renewed, and satisfactory methods have not been made to replace the Financial Assurance at least sixty (60) days before the Financial Assurance terminates, the Financial Assurance shall forthwith be replaced by cash.

1.11 Other Approvals

- (1) The Owner shall operate the Site in compliance with all applicable provincial and federal legislation and regulations and municipal by-laws.

2.0 Signs and Security

2.1 Signs

- (1) The Owner shall install and maintain a sign at the main entrance/exit to/from the Site on which is legibly displayed the following information:
 - a. the name of the Site and Owner;
 - b. the number of the Approval;
 - c. the name of the operator;
 - d. waste types to be accepted at the Site;
 - e. a twenty-four (24) hour telephone number to reach the Owner in the event of an emergency or complaint.

2.2 Security

- (1) The Site shall be maintained in a secure manner, such that unauthorized vehicles cannot enter the Site.
- (2) The Owner shall take all reasonable precautions and practical measures to prevent unauthorized persons from entering the Site, to prevent vandalism and damage to the Site's infrastructure and equipment and to prevent risk to human health and safety.
- (3) The Owner shall limit access to and from the Site to the approved hours of operation and when the Site is supervised by a Trained Personnel.
- (4) The Owner shall ensure that the Site is secured and that all entrances are secured by lockable gates to prevent unauthorized vehicle access when the Site is not open.
- (5) The Owner shall ensure that the Site is operated in a safe and secure manner, and that all waste is properly handled, contained and stored so as not to pose any threat to the general public and the Site personnel.

3.0 Service Area, Approved Waste Types and Quantities and Prohibited Waste Types

3.1 Service Area

- (1) This Site is approved to accept Organic Waste originating from the generators in the Province of Ontario.

3.2 Approved Organic Waste Types and Receipt Rates

- (1) This Site is approved to accept municipal solid, non-hazardous waste destined for Composting at the Site and limited to the Leaf and Yard Waste from municipal collection programs.
- (2) The maximum amount of Organic Waste received at the Site shall not exceed the following:
 - a. 1,500 tonnes per day; and
 - b. 22,000 tonnes per month.
- (3) The final total amount of all types of the approved Organic Waste, which may be received at this Site, shall not exceed 100,000 tonnes per year.
- (4) The maximum phased-in annual receipt rates shall not exceed the following:
 - a. 35,000 tonnes per year in Phase 1;
 - b. 50,000 tonnes per year in Phase 2;
 - c. 65,000 tonnes per year in Phase 3;
 - d. 80,000 tonnes per year in Phase 4; and
 - e. 100,000 tonnes per year in Phase 5.

3.3 Storage Rates

- (1) The Owner shall ensure that the maximum amount of all waste, including Compost, to be stored at the Site at any one time does not exceed the following amounts for the phased-in development of the Site:
 - a. Phase 1:
 - i. 13,125 tonnes of the Organic Waste, including the incoming Waste and the unfinished Organic Waste Mix and Compost stored at any one time; and
 - ii. 6,563 tonnes of Organic Waste;

b. Phase 2

- i. 18,750 tonnes of the Organic Waste, including the incoming Waste and the unfinished Organic Waste Mix and Compost stored at any one time; and
- ii. 9,375 tonnes of Organic Waste;

c. Phase 3

- i. 24,375 tonnes of the Organic Waste, including the incoming Waste and the unfinished Organic Waste Mix and Compost stored at any one time; and
- ii. 12,188 tonnes of Organic Waste;

d. Phase 4

- i. 30,000 tonnes of the Organic Waste, including the incoming Waste and the unfinished Organic Waste Mix and Compost stored at any one time; and
- ii. 15,000 tonnes of the Organic Waste;

e. Phase 5

- i. 37,500 tonnes of the Organic Waste, including the incoming Waste and the unfinished Organic Waste Mix and Compost stored at any one time; and
- ii. 18,750 tonnes of the Organic Waste.

3.4 Prohibited Waste Types

(1) The Site is not approved to receive the following waste types:

- a. any waste that is classified as hazardous waste in accordance with Regulation 347;
- b. any non-hazardous animal carcasses, including deadstock as defined in O. Regulation 105/09: Disposal of Deadstock under the *Food Safety and Quality Act*, 2001, S.O. 2001, c.20;
- c. any waste that is classified as "Specified Risk Materials" which has the same meaning as in section 6.1 of the *Health of Animals Regulations* (C.R.C., c. 296), made under the *Health of Animals Act* (S.C. 1990, c. 21), as amended;
- d. any untreated septage as defined in O. Regulation 267/03 or hauled sewage as defined in Regulation 347;
- e. any sewage sludge, which within the context of this Approval means the organic materials resulting from treatment of sewage up-to the anaerobic digestion processing step at sewage works, where the sewage works is subject to the requirements under the

OWRA and,

- i. means any works for the collection, transmission, treatment and disposal of sewage or any part of such works, but does not include plumbing to which the *Building Code Act*, 1992 applies; and
 - ii. is owned by a municipality or is privately-owned;
 - iii. is owned by the Crown or the Ontario Clean Water Agency, subject to an agreement with a municipality under the OWRA; or
 - iv. receives only waste similar in character to the residential (domestic) sewage from a household;
- f. any biosolids, which within the context of this Approval mean the organic materials resulting from treatment of sewage, including the anaerobic digestion processing step at sewage works;
- g. food waste which was originally intended for human or animal consumption from residential or IC&I sources;
- h. dedicated loads of soiled diapers, soiled incontinence products, soiled sanitary products and pet waste from the IC&I sources;
- i. any liquid IC&I organic waste;
- j. SSO from municipal curbside collection programs;
- k. any SSO that contains or is suspected of containing plant or animal products or by-products taken from aircraft, passengers and/or crew of the aircraft arriving in Ontario; and
- l. any SSO that contains or is suspected of containing plant or animal products or by-products taken from a vessel, passengers and/or crew of vessels arriving in Ontario.

4.0 SITE OPERATIONS

4.1 Hours of Operation

(1) The Owner shall ensure that,

- a. Organic Waste drop-off at the Site is Monday through Friday 6 a.m. to 7 p.m., Saturday 6 a.m. to 5 p.m.;
- b. Waste management operations at the Site are carried out seven (7) days per week, 6 a.m. to 10 p.m.;
- c. Residual Waste removal from the Site is Tuesday through Saturday 8 a.m. to 4 p.m., from

first Tuesday in May to first Tuesday in October; and

- d. Removal of Compost from the Site to Pepperlaw Farms manufacturing and agricultural operations is Monday through Friday 6 a.m. to 7 p.m. and Saturday 6 a.m. to 5 p.m.

- (2) Composting is approved to occur 24 hours per day, 7 days per week.
- (3) Notwithstanding provisions of Condition 4.1(1), the Owner shall comply with any applicable municipal by-law restrictions.

4.2 Incoming Waste Receipt

- (1) Unless otherwise required in this Approval, the incoming Organic Waste receipt shall be as set out in the Supporting Documentation.
- (2) All loads of the incoming Organic Waste accepted at the Site for Composting must be characterized in accordance with this Approval.
- (3) At the weigh scale, the Trained Personnel shall ensure that all loads of the incoming Organic Waste being accepted at the Site are accompanied by documentation containing the results of the required Waste characterization or showing the origin of the Waste, if generated by a source considered to be well-studied and classified by the Owner as a pre-approved generator of the Waste.
- (4) Organic Waste intended for Composting at the Site that has not been characterized in accordance with this Approval or that is not accompanied by the required documentation shall not be accepted at the Site and shall immediately be directed off-Site.
- (5) The Trained Personnel shall visually inspect the incoming Organic Waste, at the scale house, if possible, and again as it is being unloaded to ensure that the incoming Waste is approved for receipt at the Site and that incoming loads contain only incidental amounts of other waste materials.
- (6) The Trained Personnel at the scale house shall direct all vehicles to the designated Organic Waste unloading area, as set out in this Approval and in accordance with the Supporting Documentation.
- (7) The Owner shall not accept any individual Organic Waste source that exceeds the Metals Feedstock Standards as set out in the Standards Document.

4.3 Approved Waste Management Activities

Approved Activities

- (1) The following waste management activities are approved in this Approval:
 - a. receipt and temporary storage of the Organic Waste destined for Composting at the Site;
 - b. pre-processing of the Organic Waste, limited to shredding of the Organic Waste to reduce the waste size, and to blend the Organic Waste, as required, into the Organic Waste Mix and to achieve optimum, moisture, pH, bulk density and carbon-to-nitrogen levels for Composting;
 - c. transfer of the Organic Waste Mix from the temporary storage/pre-processing locations to the processing areas of the Site;
 - d. processing of the Organic Waste Mix, as follows:
 - i. Pasteurizing of Organic Waste Mix to reduce the pathogens to the required levels;
 - ii. Active Composting of the Organic Waste Mix into Immature Compost; and
 - iii. Curing of Immature Compost into Finished Compost;
 - e. screening of the Finished Compost, if screening is required based on the proposed end use;
 - f. sampling and testing of the Finished Compost, as required by this Approval to confirm compliance with the Compost Standards;
 - g. transfer of Compost from the Site to Pepperlaw Farms agricultural operations and manufacturing operations to produce topsoil and Compost and Soil mixes;
 - h. temporary storage of the Residual Waste and the Rejected Waste and transfer off-Site; and
 - i. shredding of the wooden overs from the Finished Compost screening and adding them to the Organic Waste Mix.
- (2) Unless otherwise approved in this Approval, receipt, pre-processing of the Organic Waste and Composting of the Organic Waste Mix in open windrows shall be carried out in accordance with the Supporting Documentation.
- (3) All approved waste management activities shall take place in designated areas as set out in the Supporting Documentation.

- (4) All approved waste management activities approved under this Approval shall only be carried out by appropriately Trained Personnel.
- (5) Progress of Composting through all of its stages shall be tracked.

Pre-Processing

- (6) Prior to pre-processing and blending into the Organic Waste Mix, the Organic Waste received at the Site may be temporarily stored for up-to seven (7) days of receipt at the Site.
- (7) Notwithstanding provisions of Condition 4.3(6), during peak season the Organic Waste received at the Site may be temporarily stored for up-to three (3) weeks of receipt at the Site.
- (8) Less putrescible Organic Waste, such as brush, brown leaves and Wood may be stored longer as needed, but no longer than three (3) months from receipt.
- (9) The pre-processing shall be carried out with up-to four (4) slow speed shredders.
- (10) Blending of the Organic Waste into the Organic Waste Mix shall be carried out to comply with the Mix Quality Criteria set out in Condition 7.1.

Active Composting

- (11) The Owner shall place the Organic Waste Mix into Active Composting windrows within four (4) days of shredding.
- (12) Composting windrows shall be arranged in a manner which permits equipment access to the Composting and storage areas for efficient turning of the windrows, to allow access for emergency vehicles and to permit efficient drainage of surface water from the processing areas.
- (13) Composting windrows shall be constructed at bulk densities and heights which promote aerobic conditions.
- (14) The Composting windrows shall be turned every 3-6 days or if need to cool the windrow or increase oxygen as proposed in the Supporting Documentation, but not less frequently than recommended in the Guideline.
- (15) The Owner shall carry out the Pasteurization Phase as follows:
 - a. all Organic Waste Mix being Composted shall be maintained at a temperature of at least 55 ° C for a cumulative time period of at least 15 days;
 - b. the temperature shall be monitored and recorded as required in Condition 7.4;
 - c. the windrows must be turned at least five (5) times throughout the fifteen (15) day period.
- (16) After the Pasteurization Phase, the temperature of the windrows shall be monitored a minimum

of weekly and the windrows shall be turned as required to maintain aerobic conditions.

Moisture Addition

- (17) Unless tested for pathogens to show compliance with the requirements from Condition 6.3, only clean water shall be used to increase moisture of the Organic Waste Mix after the commencement of the Pasteurization Phase, during Curing, and for dust control purposes.

Curing

- (18) Curing of the Immature Compost shall be done as follows:
- a. The Owner shall ensure that the Curing phase of the Composting process does not start until the Organic Waste Mix has completed the Active Composting phase and has a slower rate of decomposition, lower biological activity and oxygen demand and is characterized by reduced temperatures, lower moisture content and lower odour generation potential than the previous phases of the Composting process and the temperature monitoring required by this Approval demonstrates reduced temperatures of equal to or less than 50°C.
 - b. Once Curing windrows are formed and the Curing duration is commenced, no new additional Immature Compost shall be added to the Curing windrows.
 - c. Immature Compost shall be cured for a minimum of six (6) months as set out in the Compost Standards;
 - d. Immature Compost windrows shall be turned in accordance with the frequency set out in the Supporting Documentation, but not less frequently than required in the Guideline.

Finishing

- (19) If screening is required based on the Compost end use requirements, screening shall be carried out with up-to two (2) screeners, as proposed in the Supporting Documentation.

4.4 Waste Storage

- (1) The Owner shall ensure that all incoming Organic Waste is received and temporarily stored in the designated areas as set out in the Supporting Documentation.
- (2) The Owner shall ensure that all waste storage is undertaken in a manner that does not cause an Adverse Effect or a hazard to the environment or any person.
- (3) Should outdoor storage or management of any waste become a source of odour complaints, the Owner shall,
 - a. immediately ship the waste from the Site; or

b. manage the waste causing complaints as directed in writing by the District Manager.

- (4) In the event that the Organic Waste cannot be processed at the Site and the Site is at its approved Waste storage capacity, the Owner shall cease accepting additional Waste. Receipt of additional Organic Waste may be resumed once such receipt complies with the Waste storage limitations approved in this Approval.
- (5) All waste removed from the Site for Final Disposal shall only be disposed of at a Ministry-approved site or a site approved to accept such waste by an appropriate government agency of equivalent jurisdiction.

4.5 Residual Waste Handling and Disposal

- (1) As proposed in the Supporting Documentation, the Owner shall ensure that the Residual Waste for Final Disposal is temporarily stored in the 40-cubic yard bin and the bin is covered with a lid or a tarp to prevent contact of the Residual Waste with atmospheric precipitation, including during times of high wind events.
- (2) The wooden overs from screening of the Finished Compost may be stockpiled outdoors in the designated areas, shredded and mixed into the Organic Waste Mix destined for Composting at the Site.
- (3) The wooden overs that are unsuitable for re-use in Composting shall be transferred off-Site for Final Disposal when a load is accumulated or if the storage stockpile has caused odour complaints.

4.6 Rejected Waste Handling and Disposal

- (1) If any incoming waste load is known to, or is discovered to, contain more than incidental amounts of the unapproved wastes or materials, that load shall not be accepted at the Site.
- (2) In the event that waste that is not approved under this Approval is inadvertently accepted at the Site, the Owner shall refuse receipt of the unapproved waste and return this Rejected Waste to the generator if it is safe to do so. If return of the Rejected Waste is not feasible, then the waste shall be re-directed to the designated Rejected Waste storage area.
- (3) The Owner shall ensure that if the Rejected Waste is temporarily stored at the Site, the Rejected Waste is:
 - a. temporarily stored in designated storage area(s);
 - b. segregated from all other waste;
 - c. stored in a way that ensures that no Adverse Effect results from the temporary storage; and
 - d. handled and removed from the Site in accordance with Regulation 347 and the EPA.
- (4) The Rejected Waste shall be removed from the Site within four (4) business days or as directed

by the District Manager.

- (5) Only haulers approved by the Ministry or registered on the EASR, as required, shall be used to transport the Rejected Waste and the Residual Waste from the Site.

4.7 Prohibitions

- (1) Burning of any waste is prohibited at the Site.
- (2) No scavenging of waste is permitted at the Site.

4.8 Cross-Contamination Prevention

- (1) The Owner shall ensure that the incoming Organic Waste and the equipment used in handling of the incoming Organic Waste are kept separate and do not come in contact with the Immature Compost / the Finished Compost and Compost except where the Immature Compost / the Finished Compost and Compost are being fed back into the beginning of the Composting process.
- (2) The Owner may use equipment utilized in processing of incoming Organic Waste to process the Immature Compost / the Finished Compost and Compost provided that the equipment has been cleaned to prevent the Immature Compost / the Finished Compost and Compost from being contaminated by the incoming Organic Waste.
- (3) Unless otherwise required by this Approval the Owner shall follow the best management practices to minimize cross-contamination as proposed in the Supporting Documentation.

4.9 Wastewater/Leachate Management

- (1) The Owner shall ensure that all wastewater/leachate run-off from the Composting areas is managed as set out in the Supporting Documentation and in a way to prevent accumulation and pooling in the Composting areas.
- (2) Any discharge of the wastewater/leachate from the Site, including a discharge from the Irrigation Pond, into the natural environment must be carried out in accordance with the environmental compliance approval approved by the Ministry.
- (3) Before any use of the wastewater/leachate in the Composting process during and after the Pasteurization Phase, the Owner shall regularly sample and test the wastewater for the presence of pathogens exceeding the criteria set out in Condition 6.3.

5.0 EQUIPMENT and SITE INSPECTIONS and MAINTENANCE

5.1 Inspections

- (1) Within thirty (30) days from the issuance of this Approval or as acceptable to the District Manager, the Owner shall prepare a comprehensive written inspection program which includes procedures for inspections of all aspects of the Site's operations including the following:
 - a. waste loading/unloading/storage areas;
 - b. condition of all major pieces of the Organic Waste processing equipment;
 - c. condition of all instruments including but not limited to the instruments for monitoring the Composting process parameters;
 - d. security fence and property line;
 - e. presence of excessive fugitive odour and dust emissions from the operation of the Site;
 - f. presence of the on and off-Site litter;
 - g. presence of vector and vermin; and
 - h. condition of run-off drainage, collection and storage facilities.
- (2) The inspections required in Condition 5.1(1) shall be undertaken daily by Trained Personnel in accordance with the inspection program to ensure that all equipment and facilities at the Site are maintained in good working order at all times and that no off-Site impacts are occurring. Any deficiencies detected during these regular inspections must be promptly corrected.

5.2 Critical Spare Parts

- (1) The Owner shall prepare a list of critical spare parts and update this list annually or more frequently, if necessary, to ensure that this list is maintained up-to-date. The list shall be retained at the Site and be made available for inspection by a Provincial Officer, upon request.
- (2) The Owner shall ensure that the critical spare parts are available at the Site at all times or be immediately available from an off-Site supplier.

5.3 Preventative Maintenance

- (1) The Owner shall develop and implement a preventative maintenance program for all on-Site equipment associated with the processing and managing of waste and control of odour, noise and dust emissions. The preventative maintenance program shall be maintained up-to-date, be retained at the Site and be available for inspection by a Provincial Officer, upon request.

6.0 COMPOST QUALITY STANDARDS and CRITERIA

6.1 Metals Feedstock Standards

- (1) The incoming Organic Waste received at the Site shall not exceed the Metals Feedstock Standards for AA Category of Compost, as set out in the Standards Document.

6.2 Compost Quality Standards

Metals Compost Standards

- (1) Compost shall not contain regulated metals in a concentration that exceeds Metals Compost Standards for AA Category of Compost, as set out in the Standards Document.

Maturity Compost Standards

- (2) Compost shall comply with the Maturity Compost Standards for AA Category of Compost, as set out in the Standards Document.

Pathogen Reduction Compost Standards

- (3) Compost shall comply with the Pathogen Reduction Compost Standards for AA Category of Compost from Leaf and Yard Waste, as set out in the Standards Document, including as a minimum, the pasteurization temperature and residency time requirements set out in the Standards Document.

Foreign Matter Compost Standards

- (4) Compost shall comply with the Foreign Matter Compost Standards for AA Category of Compost, including the total foreign matter content and sharp foreign matter content limits as set out in the Standards Document.

6.3 Pathogens in Wastewater/Leachate

- (1) Prior to any use in the Composting process after the Pasteurization Phase, the wastewater/leachate shall not exceed the following:
 - a. 1,000 colony forming units (CFU) E. coli or most probable number (MPN)/100 millilitres;
and
 - b. 3 MPN Salmonella/100 millilitres.

7.0 PROCESSING CRITERIA and MONITORING

7.1 Composting Recipe Criteria

Carbon to Nitrogen Ratio

- (1) The Owner shall ensure that the Carbon to Nitrogen Ratio of the Organic Waste Mix prior to its incorporation into the Composting process is maintained between 25:1 and 35:1 with the target of 30:1.

Moisture

- (2) The Owner shall ensure that the moisture content of the Organic Waste Mix prior to its incorporation into the Composting process is maintained between 40% and 60%.

Porosity and Bulk Density

- (3) The Owner shall ensure that prior to its incorporation into the Composting process, the Organic Waste Mix has the appropriate porosity and the bulk density to promote aerobic conditions within the windrows.

7.2 Moisture Content

- (1) The Owner shall ensure that the moisture content of the Organic Waste Mix undergoing Active Composting is maintained between 40% and 60%, at all times.
- (2) The Owner shall ensure that the moisture content of the Immature Compost undergoing curing is maintained at or above 40%, at all times, as required by the Compost Standards.
- (3) The moisture content during the Composting process shall be monitored and recorded:
 - a. when the Organic Waste Mix has been generated for Composting;
 - b. during Active Composting, on a weekly basis;
 - c. at the beginning of Curing of Immature Compost; and
 - d. during Curing, on a weekly basis or as required to show compliance with Condition 7.2(2);
- (4) For the purpose of verifying compliance with the moisture content standard during Curing, the Owner shall sample for the moisture content of the Immature Compost during Curing to ensure that the moisture testing is representative of the Curing conditions at any time.
- (5) For the purpose of controlling the moisture content during the Active Composting or the Curing processes, the Owner may also use the squeeze test in accordance with the document entitled "Best Practices for Operating an Aerated Windrow Composting Facility", prepared by The Compost Council of Canada for Manitoba Conservation and Water Stewardship, dated 2016 or

another equivalent method.

- (6) For the purpose of verifying compliance with the maturity standard moisture requirement, the Owner shall test the moisture level within the Immature Compost in the Curing windrows using the procedure(s) set out in the BNQ Industry Standard, CAN/BNQ 0413-200/2016 *Organic soil conditioners - Compost*, as amended.
- (7) The samples shall be collected from the waste in the sections of the windrows as they are progressively constructed and de-constructed and they shall represent the full depth profile of the windrow, starting at the location one (1) metre from the surface and including locations in the middle and bottom of the windrow.

7.3 Oxygen Content

- (1) The Owner shall ensure that the oxygen content of the Organic Waste Mix undergoing Composting is sufficient to prevent the Organic Waste Mix from becoming anaerobic at any one time with a target range for aerobic conditions of 12-18% oxygen concentration, with a minimum of 10%, as set out in the Guideline.
- (2) Monitoring of the oxygen content of the Organic Waste Mix undergoing Composting shall be carried out in accordance with the procedures set out in the Supporting Documentation.
- (3) The Owner shall initiate appropriate remedial measures to increase the oxygen content of the Organic Waste Mix or Immature Compost undergoing Composting:
 - a. within one (1) hour of identifying the oxygen content excursions at or below 10% within the Organic Waste Mix; and
 - b. within one (1) day of identifying the oxygen content excursions at or below 10% within the Immature Compost.

7.4 Temperature

- (1) For sections of the Composting windrow constructed during the same time period, the temperature readings shall be taken every fifteen (15) metres along the length of the Composting windrow section or at six (6) representative locations, whichever method yields more locations.
- (2) The Owner shall track and mark the sections of the windrows that are monitored under Condition 7.4(1).
- (3) Temperature shall be measured within the windrows at a depth of one (1) metre from the surface of the waste undergoing Composting during Active Composting and Curing.
- (4) The Owner shall ensure that after the Pasteurization Phase, the temperature of the Composting Organic Waste Mix does not exceed 65 degrees Celsius and that within four (4) hours of identifying the temperature excursions above this level, appropriate remedial measures to lower

the Composting temperature to the required level are initiated.

- (5) The temperature during Pasteurization Phase shall be monitored and recorded daily and at least weekly during the at all other times as set out in the Compost Standards.

8.0 TESTING

8.1 General Requirements for Feedstock, Immature Compost and Finished Compost

- (1) The Owner shall maintain a Quality Assurance/Quality Control (QA/QC) program for sampling and analysis of the Feedstock, the Immature Compost and the Finished Compost, as required by this Approval, and shall make the results of the QA/QC program, including all analyses carried out by an accredited laboratory service provider, available for inspection upon request by the District Manager, the Director and any Provincial Officer.
- (2) All required analytical results shall be from a laboratory service provider accredited ISO/IEC:17025:2005 standard by a Canadian Association for Laboratory Accreditation or equivalent.

Sample Preparation and Testing Methods and Procedures

- (3) The Owner shall contact their laboratory service provider for recommended sample preparation methods, sample containers, and other materials and instructions for sample collection and handling and shall prepare a written sampling protocol. This protocol shall be made available to the Ministry staff, upon request.

General Requirements for Sampling and Analysis

- (4) The Feedstock, the Immature Compost and the Finished Compost sampling/composite sample preparation and testing methods and procedures shall be as set out in Appendix 1 and Appendix 2 of the Standards Document.

Re-testing

- (5) Re-testing due to sample failure is as set out in the Standards Document.

8.2 Testing of Incoming Organic Waste (Feedstock)

- (1) The Owner shall ensure that all incoming Organic Waste is characterized in accordance with the requirements set out in the Compost Standards and in this Approval.
- (2) If the Owner relies on the published data for the well-studied/characterized Organic Waste, the latest published information shall be used to confirm that the incoming Organic Waste received at the Site and are destined to be processed into Compost at the Site comply with the Feedstock standards from the Standards Document.
- (3) If the published data is not available or testing is used to confirm compliance of the incoming Organic Waste with the Feedstock Standards from the Standards Document, the Owner shall:
 - a. establish the incoming Organic Waste sampling/testing protocol as set out in Appendix 1 and Appendix 2 of the Standards Document;
 - b. sample and analyze representative samples of the incoming Organic Waste to be received at the Site prior to receipt at the Site;
 - c. sample the incoming Organic Waste on a monthly basis for a period of one (1) year or until a consistent characteristic profile is obtained or for Organic Waste which are received less frequently than monthly, sample each incoming load for a period of one (1) year, or until a consistent characteristics profile is obtained; and
 - d. sample the incoming Organic Waste when the characteristics of the Organic Waste have changed.
- (4) Notwithstanding the provisions of Condition 8.2(3), above, the Owner shall periodically sample the incoming Organic Waste for which consistent characteristics have been obtained to confirm that the Organic Waste has not changed.
- (5) If at any time, the average concentration of any regulated metal in the Finished Compost is found to be greater than 80% of the Metals Compost Standard set out in Condition 6.2, the Owner shall carry out an investigation, including testing of the incoming Organic Waste, to determine the source and the cause of the elevated metal concentration.
- (6) Based on demonstrated compliance with the Feedstock characterization requirements from Conditions 8.2(1) through 8.2(5), the Owner may designate the generator as a pre-approved source.

8.3 Sampling/Testing of the Finished Compost

- (1) Prior to being transferred from the Site for its intended end use, the Owner shall

- a. conduct quality control testing of the Finished Compost in accordance with the requirements set out in the Standards Document; and
 - b. ensure that all Composting records demonstrate compliance with the temperature and residency time requirements for pathogen inactivation set out in the Standards Document.
- (2) The frequency of sampling of the Finished Compost shall be in accordance with the requirements set out in the Compost Standards.

9.0 COMPLIANCE WITH COMPOST QUALITY STANDARDS and DISPOSAL and/or RE-USE REQUIREMENTS

9.1 Compliance with Compost Quality Standards

- (1) Prior to being transferred from the Site for its intended end use, the Owner shall:
- a. conduct quality control testing of the Finished Compost in accordance with the requirements set out in the Standards Document and this Approval;
 - b. ensure that all Composting records for the Finished Compost demonstrate compliance with the temperature and residence time requirements for pathogen inactivation set out in the Standards Document; and
 - c. ensure that all Composting records for the Curing of Immature Compost demonstrate compliance with the curing moisture content requirements set out in the Standards Document.
- (2) Finished Compost is considered to be Compost when it complies with Compost Quality Standards for AA Category Compost.

9.2 Non-compliance with Compost Quality Standards

- (1) Finished Compost is a non-exempted waste until sampling/testing required by this Approval demonstrates that all Compost Quality Standards specified in this Approval are met at the required frequencies.
- (2) The Owner shall segregate the Immature Compost at various stages of Curing until all Compost Quality Standards specified in this Approval are tested for and met for the production of Compost.
- (3) When the Finished Compost complies with Compost Quality Standards for AA Category Compost, it is considered to be Compost AA Category and it may be transferred off Site:
- a. for unrestricted use as Category AA Compost; or

- b. for use as a non-agricultural source material in accordance with the NMA.
- (4) When the Finished Compost complies with the Metals Compost Standards, the Foreign Matter Compost Standards, the Pathogen Reduction Compost Standards, but not with the Maturity Compost Standards, it is considered to be an Immature Compost and shall:
- a. be re-tested and/or shall continue to undergo Curing at the Site; or
 - b. be disposed of as waste at a waste disposal site approved by the Ministry, or its equivalent if in jurisdictions outside of Ontario, to accept such waste.
- (5) The Finished Compost complies with the Metals Compost Standards, the Foreign Matter Content Compost Standards, the Maturity Compost Standards but not the Pathogen Reduction Compost Standards, it continues to be considered an unfinished Organic Waste Mix and shall:
- a. be returned to the Composting process for pasteurization as set out in this Approval; or
 - b. be disposed of as waste at a waste disposal site approved by the Ministry, or its equivalent if in jurisdictions outside of Ontario, to accept such waste.
- (6) When the Finished Compost exceeds Metals Compost Standards but meets the Metals Feedstock Standards, it may be returned to the Composting process as an incoming Organic Waste for re-processing at the Site to produce Compost category in compliance with the Compost Standards.

10.0 ENVIRONMENTAL IMPACT CONTROL and HOUSEKEEPING

- (1) The Owner shall ensure that, if possible, all waste management activities at the Site, including turning of the processing windrows, are undertaken during favourable wind conditions and when wind is blowing away from the Sensitive Receptors.

10.1 Odour Management

- (1) The Owner shall prepare, maintain and implement the Odour Management Plan for control of odour from the Site.
- (2) The Odour Management Plan shall be in compliance with the Ministry's technical bulletin entitled "Ministry's Best Management Practices for Industrial Sources of Odour" posted on the Ministry's website and as directed by the District Manager.
- (3) The Odour Management Plan for control of odour shall be made available to the District Manager for review and concurrence, upon request.
- (4) Upon receipt of the District Manager's concurrence to the Odour Management Plan, the Owner shall implement the Odour Management Plan as directed by the District Manager.
- (5) The Owner shall implement appropriate housekeeping procedures at the Site, including regular

cleaning of the Organic Waste handling equipment to minimize emissions of odour from the Organic Waste handling areas.

10.2 Litter

- (1) The Owner shall:
 - a. take all necessary steps to prevent the escape of litter from the Site;
 - b. pick up litter at the Site on a daily basis, or more frequently if necessary;
 - c. if necessary, erect litter fences around the areas causing a litter problem; and
 - d. weekly, or more frequently as necessary, pick up off the Site litter which can reasonably be determined to have originated from the Site.

10.3 Dust

- (1) The Owner shall prepare, maintain and implement the Dust Management Plan for control of dust from the Site.
- (2) The Dust Management Plan for control of dust shall be made available to the District Manager for review and concurrence, upon request.
- (3) Upon receipt of the District Manager's concurrence to the Dust Management Plan, the Owner shall implement the Dust Management Plan as directed by the District Manager.
- (4) The Owner shall ensure that all on-site roads and operations/yard areas are regularly wetted with clean water or swept to prevent dust impacts off-Site.
- (5) The Owner may use the wastewater/leachate, collected at the Site, to wet the Composting windrows prior to the start of the Pasteurization Phase of Composting, only if the use of the wastewater/leachate does not result in odorous discharges to the natural environment.
- (6) Following the commencement of the Pasteurization Phase, the Owner shall use only clean water to wet the Composting windrows unless the wastewater/leachate from the Irrigation Pond has been tested to show compliance with the requirements set out in Condition 6.3.

10.4 Vermin and Vectors

- (1) The Owner shall implement necessary housekeeping procedures to eliminate sources and potential sources of attraction for vermin and vectors.
- (2) If the Owner-initiated program is ineffective, the Owner shall hire a qualified, licensed pest control professional to design and implement a pest control plan for the Site. The pest control

plan shall remain in place, and be updated from time to time, as necessary.

- (3) If at any time the Organic Waste or the Organic Waste undergoing processing creates a negative impact, including but not limited to attraction to vermin and vectors, and the remedial measures cannot successfully mitigate the impacts within seven (7) days, the Owner shall forthwith remove the Organic Waste or the Organic Waste undergoing processing causing the negative impact for disposal at an approved waste disposal site.

10.5 Vehicles and Traffic

- (1) The Owner shall ensure that all vehicles transporting waste from the Site are not leaking or dripping waste or wastewater when leaving the Site.
- (2) The Owner shall ensure that vehicles leaving the Site do not drag mud or waste onto the public roadways.
- (3) Should the Owner become aware that a vehicle delivering Organic Waste to the Site has leaked wastewater on the municipal roadways, the Owner shall immediately report the violation to the owner of the vehicle(s) and to the District Manager.
- (4) The Owner shall ensure that the wheels of all vehicles departing from the Site are inspected and cleaned, as required, prior to the vehicles' departure from the Site.
- (5) The Owner shall ensure that there is no queuing or parking of vehicles that are waiting to enter the Site on any roadway that is not a distinct part of the Site.
- (6) The Owner shall ensure that vehicles transporting waste and Compost from the Site are appropriately covered as they depart the Site, so that fugitive dust or odour emissions are minimized during the transport to their next destination.

11.0 COMPLAINTS MANAGEMENT

- (1) A designated representative of the Owner shall be available to receive public complaints caused by the operations at the Site twenty-four (24) hours per day, seven (7) days per week.
- (2) If at any time, the Owner receives a complaint regarding the operation of the Site, the Owner shall respond to the complaint according to the following procedure:
 - a. The Owner shall record each complaint on a formal complaint form entered in a computerized tracking system. The information recorded shall include the nature of the complaint, circumstances of the complaint including weather conditions, the name, address and the telephone number of the complainant and the time and date of the complaint;
 - b. the Owner, upon notification of the complaint shall initiate appropriate steps to determine all possible causes of the complaint, proceed to take the necessary actions to eliminate the cause

of the complaint and forward a formal reply to the complainant; and

- c. the Owner shall immediately notify the Ministry of the complaint, followed with the submission of a written report within one (1) week of the complaint detailing what actions, if any, were taken to identify and remediate the cause of the complaint and what remedial action, if any, would be taken.

12.0 OPERATIONS MANUAL and PERSONNEL TRAINING

12.1 Operations Manual

- (1) Within three (3) months from the date of this Approval or as acceptable to the District Manager, the Owner shall prepare an Operations Manual for the Site. As a minimum, the Operations Manual shall contain the following:
 - a. outline of the responsibilities of the Site personnel;
 - b. personnel training protocols;
 - c. Site Operating Procedures including but not limited to Organic Waste receiving and screening procedures, unloading, handling and storage procedures and waste processing procedures, including preparation of the Organic Waste Mix, the aerobic Composting in the windrows, Curing of the Immature Compost and screening of the Finished Compost;
 - d. sampling, testing, monitoring and recording procedures as required by this Approval;
 - e. required data recording procedures;
 - f. emergency response procedures including an outline of the responsibilities of Site personnel including roles and responsibilities during emergency situations, exit locations and evacuation routing, and locations of relevant equipment available for handling of the emergency situations;
 - g. the contingency plans for the Site;
 - h. equipment and Site inspection procedures, as required by this Approval;
 - i. nuisance impact control and housekeeping procedures, as required by this Approval; and
 - j. the procedures for handling and recording complaints as described in this Approval.
- (2) A copy of this Operations Manual shall be kept at the Owner's office, must be accessible to Site personnel at all times and must be updated, as required.

12.2 Personnel Training

- (1) All Site personnel shall be trained with respect to the following:
 - a. operation and management of the Site, or area(s) within the Site, as per the specific job requirements of each individual operator in accordance with the Operations Manual required by Condition 12.1(1), above;
 - b. terms and conditions of this Approval, relevant to the specific job requirements of each individual operator in accordance with the Operations Manual required by Condition 12.1(1), above;
 - c. environmental, and occupational health and safety concerns pertaining to the wastes to be handled;
 - d. emergency first-aid information; and
 - e. relevant waste management legislation and regulations, including the EPA and Regulation 347.
- (2) The Owner shall ensure that all employees at the Site are trained in the requirements of this Approval relevant to the employee's position:
 - a. upon commencing employment at the Site in a particular position; and
 - b. whenever items listed in Condition 12.2(1) are changed or during the planned three (3)-year refresher training.

13.0 EMERGENCY RESPONSE and CONTINGENCY PLAN

- (1) Within six (6) months from the date of this Approval or as acceptable to the District Manager, the Owner shall prepare an Emergency Response and Contingency Plan for the Site. The Emergency Response and Contingency Plan shall be prepared in consultation with the District Manager. The Owner shall also invite the local municipality and the local Fire Department to provide input and/or comments into preparation of the Emergency Response and Contingency Plan. The Emergency Response and Contingency Plan, as a minimum shall include the following:
 - a. emergency response procedures to be undertaken in the event of a spill, process upset, power failure, fire or any other emergency situation, including specific clean up methods for wastes expected to be generated from an emergency situation;
 - b. a list of equipment and clean up materials available for dealing with the emergency situations and their locations on the Site plan;

- c. notification protocol with names and telephone numbers of persons to be contacted, including persons responsible for the Site, the Ministry's District Office and Spills Action Centre, the local Fire Department, the local Municipality, the local Medical Officer of Health, and the Ministry of Labour, and the names and telephone numbers of waste management companies available for emergency response;
 - d. procedures and actions to be taken should the incoming Organic Waste not meet the quality criteria set out in this Approval;
 - e. procedures and actions to be taken should the outgoing Residual Waste not meet the quality criteria set out in the receiving site environmental compliance approval;
 - f. procedures and actions to be taken should the Composted Organic Waste fail to meet the required Compost Quality Standards;
 - g. procedures and actions to be taken should the temporary storage of the Organic Waste at the Site result in occurrence of complaints;
 - h. procedures and actions to be taken should the occurrence of complaints require the Owner to implement additional odour control measures;
 - i. procedures and actions to be taken should the occurrence of complaints require the Owner to suspend waste processing activities at the Site; and
 - j. procedures and actions to be taken should the Recipe Mix Criteria set out in this Approval not be met.
- (2) An up-to-date version of the Emergency Response and Contingency Plan shall be kept at the Owner's office, in a central location known and available to all Site personnel. A copy shall be made available to Ministry staff upon request and to the local municipality and the local Fire Department, if requested.
- (3) The Emergency Response and Contingency Plan shall be reviewed on an annual basis and updated, if necessary. The revised version of the Emergency Response and Contingency Plan shall be provided to the District Manager and to the local municipality and the Fire Department, if requested.

14.0 EMERGENCY SITUATIONS RESPONSE and REPORTING

- (1) The Owner shall immediately take all necessary measures, as set out in the Emergency Response and Contingency Plan, to handle the emergency situations occurring at the Site.

- (2) The Owner shall ensure that the equipment and materials outlined in the Emergency Response and Contingency Plan are immediately available at the Site at all times and are in a good state of repair and fully operational.
- (3) The Owner shall ensure that all Site personnel are fully trained in the use of the equipment and materials outlined in the Emergency Response and Contingency Plan, and in the procedures to be employed in the event of an emergency.
- (4) All Spills shall be immediately reported to the **Ministry's Spills Action Centre at 1-800-268-6060** and to the local municipality shall be recorded in the log book as to the nature and cause of the spill, and the action taken for clean-up, correction and prevention of similar future occurrences.
- (5) Should a Spill, occur at the Site, in addition to fulfilling the requirements from the EPA, the Owner shall submit to the District Manager a written report within three (3) calendar days outlining the nature of the Spill, remedial measures taken and the measures taken to prevent future occurrences at the Site.

15.0 RECORDS KEEPING

15.1 Activities at the Site

- (1) The Owner shall maintain a written or digital record of activities undertaken at the Site. All measurements shall be recorded in consistent metric units of measurement. The record shall include, as a minimum, the following information:
 - a. date, quantity, source and type of the Organic Waste at the Site;
 - b. analytical data from testing of the incoming Organic Waste or the published data and justification for using the published data;
 - c. date, quantity, type, quality (including the analytical data from any compliance testing) and the destination of Compost transferred from the Site;
 - d. date, quantity, type, quality (including the analytical data from any compliance testing) and the destination of Finished Compost that was transferred back to the Composting process;
 - e. date, quantity, type and the destination of the total Residual Waste, transferred from the Site for Final Disposal;
 - f. date, quantity, type and the destination of the Rejected Waste transferred off-Site and the reason for rejection;
 - g. waste processing activities undertaken at the Site, including the Organic Waste shredding, windrow construction, addition of moisture and turning activities, Finished Compost screening;
 - h. monitoring and sampling activities;
 - i. housecleaning activities;
 - j. running total of the Organic Waste temporarily stored prior to Composting, the Organic Waste Mix undergoing Composting, Immature Compost, the Finished Compost, the Residual Waste, the Rejected Waste and the Compost present at the Site; and

k. temperature and/or oxygen content excursions outside of the required levels.

15.2 Emergency Situations

- (1) The Owner shall maintain a written or digital record of the emergency situations. The record shall include, as a minimum, the following:
 - a. the type of an emergency situation;
 - b. description of how the emergency situation was handled;
 - c. the type and amount of material spilled, if applicable;
 - d. a description of how the spilled material was cleaned up and waste stored, if generated; and
 - e. the location and time of final disposal, if applicable.

15.3 Inspections

- (1) The Owner shall maintain a written or digital record of inspections as required by this Approval. The record shall include, as a minimum, the following:
 - a. the name and signature of person that conducted the inspection;
 - b. the date and time of the inspection;
 - c. the list of any deficiencies discovered;
 - d. the recommendations for remedial action; and
 - e. the date, time and description of actions taken.

15.4 Personnel Training

- (1) The Owner shall maintain a written or digital record of training as required by this Approval. The record shall include, as a minimum, the following:
 - a. date of training;
 - b. name and signature of person who has been trained; and
 - c. description of the training provided.

15.5 Sampling and Testing Records

- (1) The Owner shall establish and maintain a written or digital record of all sampling and testing activities at the Site. This record shall include, as a minimum, the following information:
 - a. waste sampled, sample collection locations and volume collected;
 - b. day and time of collection;
 - c. sample handling procedures;
 - d. name of the person undertaking the sampling;
 - e. parameters tested for and the results;
 - f. name of the laboratory service provider facility conducting the testing, if applicable; and

- g. conclusions drawn with respect to the results of the monitoring and testing.

15.6 Monitoring Records

- (1) The Owner shall establish and maintain a written or digital record of all monitoring activities at the Site as required by this Approval. This record shall include, as a minimum, the following information:
 - a. temperature monitoring;
 - b. oxygen levels monitoring; and
 - c. moisture levels monitoring.

15.7 Complaints Management

- (1) The Owner shall establish and maintain a written or digital record of all complaints and the responses as required by this Approval.

15.8 Annual Report

- (1) By September 30st following the end of each operating year, the Owner shall prepare and submit to the District Manager, an Annual Report, in a format or formats acceptable to the District Manager, summarizing the operation of the Site covering the previous calendar year. This Annual Report shall include, as a minimum, the following information:
 - a. annual amount of the Organic Waste received and processed at the Site, including the waste type, quantity and sources;
 - b. annual amount and quality of Compost transferred from the Site and its final destination;
 - c. a summary describing any Rejected Waste including quantity, waste type, reasons for rejection and origin of the Rejected Waste;
 - d. annual amount of the Residual Waste transferred from the Site for Final Disposal and its destination;
 - e. number of Composting windrows and the status of processing at the end of the operating year;
 - f. amount of unprocessed Organic Waste temporarily stored at the Site at the end of the operating year;
 - g. amount of Compost temporarily stored at the Site at the end of the operating year;

- h. any environmental and operational problems, that could negatively impact the environment, encountered during the operation of the Site or identified during the facility inspections and any mitigative actions taken;
- i. any changes to the Emergency Response and Contingency Plan, the Operations Manual or the Closure Plan that have been approved by the Director or the District Manager since the last Annual Report;
- j. any recommendations to minimize environmental impacts from the operation of the Site and to improve Site operations and monitoring programs in this regard;
- k. a summary of any complaints received and the responses made, as required by this Approval;
- l. a summary of the monitoring required by this Approval;
- m. a descriptive summary of any spills, incidents or other emergency situations which have occurred at this Site, any remedial measures taken, and the measures taken to prevent future occurrences;
- n. an annual summary of any deficiencies, items of non-compliance or process aberrations that occurred at this Site and any remedial/mitigative action taken to correct them;
- o. an up-to-date estimate of the Financial Assurance required for the Site; and
- p. a condition-by-condition analysis of compliance with all conditions of this Approval.

(2) The Owner shall keep a copy of the latest Annual Report at the Site, at all times.

16.0 CLOSURE PLAN

- (1) The Owner shall submit, for approval by the Director, a written Site Closure Plan at least four (4) months prior to the permanent closure of the Site. This plan must include, as a minimum, a description of the work that will be done to facilitate closure of the Site and a schedule for completion of that work.
- (2) Within ten (10) days after closure of the Site, the Owner shall notify the Director, in writing, that the Site is closed and that the Closure Plan has been implemented.

17.0 NOTIFICATION to the DIRECTOR and the DISTRICT MANAGER

- 17.1 A minimum of thirty (30) days prior to receipt of the new amount of Organic Waste and the commencement of the next phase of the Site development, the Owner shall notify in writing, the Director and the District Manager of the start date of the next phase of Site development operations.

Schedule 1

The following Schedule 1 forms part of this Environmental Compliance Approval:

1. Application for an Environmental Compliance Approval (Waste Disposal Site - Composting) dated June 30, 2025 and signed by Dehtiar, Pfefferlaw Peat Products Inc., and submitted by Julie (Marchand) Beneteau, B.Sc., Project Coordinator, Pinchin Ltd. and including the following attachments:
 - a. Confidentiality Rationale
 - b. Verification of Legal Name and Property Owner
 - c. Proof of Consultation
 - d. Scaled Area Location Plan
 - e. Design and Operation Report
2. Email dated July 17, 2025 (10:29 a.m.) from Julie (Marchand) Beneteau, B.Sc., Project Coordinator, Pinchin Ltd. to Nadiya Memraj, Ontario Ministry of the Environment, Conservation and Parks, to provide additional information on the stormwater drainage at the site and including an attachment entitled "CRA account number- Pfefferlaw.pdf".
3. Email dated August 19, 2025 (11:35 a.m.) from Julie (Marchand) Beneteau, B.Sc., Project Coordinator, Pinchin Ltd. to Margaret Wojcik, Ontario Ministry of the Environment, Conservation and Parks, to provide additional information on the proposal, including an attachment entitled "342836.002 Response to MECP, Pfefferlaw Farms, MECP Ref #8276-DJ8H7M, 19Aug2025.pdf".
4. Email dated August 20, 2025 (4:59 p.m.) from Julie (Marchand) Beneteau, B.Sc., Project Coordinator, Pinchin Ltd. to Margaret Wojcik, Ontario Ministry of the Environment, Conservation and Parks, to provide additional information on the number of the compost screening units.
5. Email dated September 24, 2025 (10:42 a.m.) from Tal Dehtiar, Pfefferlaw Peat Products Inc., to Margaret Wojcik, Ontario Ministry of the Environment, Conservation and Parks, to provide additional information on the residual waste storage bin.
6. Email dated September 24, 2025 (11:09 a.m.) from Tal Dehtiar, Pfefferlaw Peat Products Inc., to Margaret Wojcik, Ontario Ministry of the Environment, Conservation and Parks, to provide additional information on the number of the shredding units.
7. Email dated September 24, 2025 (4:37 p.m.) from Julie (Marchand) Beneteau, B.Sc., Project Coordinator, Pinchin Ltd. to Margaret Wojcik, Ontario Ministry of the Environment, Conservation and Parks, to provide corrected site size and the updated site plan(s) and the following attachments: "Scaled Site Area Plan - Pfefferlaw Farms.pdf", "Appendix B - 1Property Layout.pdf" and "Appendix B - 2Site Plan.pdf".

The reasons for the imposition of these terms and conditions are as follows:

GENERAL

Conditions 1.1, 1.4, 1.5, 1.6, 1.9 and 1.11 and are included to clarify the legal rights and responsibilities of the Owner.

Conditions 1.2 and 1.3 are included to ensure that the Site is build and operated in accordance with the application and supporting documentation submitted by the Owner, and not in a manner which the Director has not been asked to consider.

Condition 1.7(1) is included to ensure that the Site is operated under the corporate name which appears on the application form submitted for this approval and to ensure that the Director is informed of any changes. Condition 1.7(2) is included to restrict potential transfer or encumbrance of the Site without the approval of the Director and to ensure that any transfer of encumbrance can be made only on the basis that it will not endanger compliance with this Approval.

Condition 1.8 is included to ensure that the appropriate Ministry staff has ready access to the operations of the Site which are approved under this Approval. The Condition is supplementary to the powers of entry afforded a Provincial Officer pursuant to the EPA, the OWRA, the PA, the NMA and the SDWA.

Condition 1.10 is included to ensure that sufficient funds are available to the Ministry to clean up the Site in the event that the Owner is unable or unwilling to do so.

SIGNS and SITE SECURITY

Condition 2.0 is included to ensure that the Site's users, operators and the public are fully aware of important information and restrictions related to the operation of the Site.

Condition 2.0 is also included to ensure that the Site is sufficiently secured, supervised and operated by properly Trained Personnel and to ensure controlled access and integrity of the Site by preventing unauthorized access when the Site is closed and no site personnel is on duty.

SERVICE AREA, APPROVED WASTE TYPES and QUANTITIES and PROHIBITED WASTE TYPES

Condition 3.0 is included to specify the approved Waste receipt rates, the approved Waste types and the service area from which the Waste may be accepted at the Site based on the Owner's application and supporting documentation.

Condition 3.3 is also included to identify the amounts of waste approved to be present at the Site at any one time for the purpose of calculating the Financial Assurance requirements for the Site.

SITE OPERATIONS

Condition 4.1 is included to specify the hours of operation for the Site to ensure that the hours of Site's operation do not result in an adverse effect or a hazard to the natural environment or any person.

Condition 4.2 is included to ensure that only the approved Organic Waste types are accepted and processed at the Site.

Conditions 4.3 through 4.9 are included to ensure that waste handling, processing and storage at the Site are undertaken in a way which does not result in an adverse environmental effect or a hazard to the environment or any person and are in accordance with the application and supporting documentation submitted by the Owner, and not in a manner which the Director has not been asked to consider.

Condition 4.7 is included to set out prohibitions since the activities were not included in the proposal and not considered by the Director.

EQUIPMENT and SITE INSPECTIONS and MAINTENANCE

Condition 5.0 is included to require the equipment used for waste management and pollution control to be inspected and maintained thoroughly and on a regular basis to ensure that the operations at the Site are undertaken in a manner which does not result in an Adverse Effect or a hazard to the health and safety of the environment or any person.

COMPOST QUALITY STANDARDS and CRITERIA

Conditions 6.1 and 6.2 are included to identify the Compost Quality Standards and criteria that must be met before Finished Compost can be considered Category AA Compost suitable for its intended end use and eligible for exemption from the requirement for an environmental compliance approval for use at a site.

Condition 6.3 is included to specify the requirements applicable to leachate to be used for wetting purposes during the Composting process and for dust control.

PROCESSING CRITERIA and MONITORING

Condition 7.0 is included to specify the Composting recipe criteria and the operating parameters required for a properly functioning Composting operation as per the consensus in the composting industry and the Ministry's requirements so that the operation for the Site does not result in an Adverse Effect or a hazard to the natural environment or any person.

Condition 7.0 is also included to require the Owner to carry out the monitoring and testing activities required to verify processing criteria required under this Approval.

TESTING

Condition 8.0 is included to ensure that the Owner accepts and processes only the waste types that are

approved in this Approval and that those wastes that are appropriate for Composting.

Condition 8.0 is also included to ensure that the Owner regularly tests the incoming Organic Waste and the Finished Compost to verify compliance with the Compost Quality Standards and compatibility of Compost produced at the Site with its proposed end use.

COMPLIANCE WITH COMPOST QUALITY STANDARDS and DISPOSAL and/or RE-USE REQUIREMENTS

Condition 9.0 is included to identify applicable regulatory compliance criteria for the wastes processed or generated at the Site to ensure that all outputs from waste management activities at the Site are properly managed, processed and disposed of in accordance with the Ministry's regulatory requirements and in a manner that protects the health and safety of the public and the environment.

Condition 9.2 is also included to set out the procedures for the Owner to follow should non-compliance with the Compost Quality Standards occur.

ENVIRONMENTAL IMPACT CONTROL and HOUSEKEEPING

Condition 10.0 is included to ensure that the Site is operated and maintained in an environmentally acceptable manner which does not result in a negative impact on the natural environment or any person.

COMPLAINTS MANAGEMENT PROCEDURE

Condition 11.0 is included to require the Owner to respond to any environmental complaints resulting from the operations at the Site appropriately and in a timely manner and that appropriate actions are taken to prevent any further incidents that may cause complaints in the future.

OPERATIONS MANUAL and PERSONNEL TRAINING

Condition 12.0 is included to ensure that personnel employed at the Site are fully aware and properly trained on the requirements and restrictions related to Site operations under this Approval.

EMERGENCY RESPONSE and CONTINGENCY PLAN

Condition 13.0 is included to ensure that the Owner is prepared and properly equipped to take action in the event of an emergency situation.

EMERGENCY SITUATIONS RESPONSE and REPORTING

Condition 14.0 is included to require further spill notification to the Ministry, in addition to the requirements already listed in Part X of the EPA.

RECORDS KEEPING

Condition 15.0 is included to ensure that detailed records of Site activities, inspections, monitoring and upsets are recorded and maintained for inspection and information purposes.

CLOSURE PLAN

Condition 16.0 is included to ensure that final closure of the Site is completed in accordance with Ministry's standards.

NOTIFICATION to the DIRECTOR and DISTRICT MANAGER

Condition 17.1 is included to notify the Director and the District Manager of the commencement of the additional phases of Site development.

In accordance with Section 139 of the *Environmental Protection Act*, you may by written notice served upon me, the Ontario Land Tribunal and in accordance with Section 47 of the *Environmental Bill of Rights*, 1993, the Minister of the Environment, Conservation and Parks, within 15 days after receipt of this notice, require a hearing by the Tribunal. The Minister of the Environment, Conservation and Parks will place notice of your appeal on the Environmental Registry. Section 142 of the *Environmental Protection Act* provides that the notice requiring the hearing ("the Notice") shall state:

- a. The portions of the environmental compliance approval or each term or condition in the environmental compliance approval in respect of which the hearing is required, and;
- b. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

The Notice should also include:

1. The name of the appellant;
2. The address of the appellant;
3. The environmental compliance approval number;
4. The date of the environmental compliance approval;
5. The name of the Director, and;
6. The municipality or municipalities within which the project is to be engaged in.

And the Notice should be signed and dated by the appellant.

This Notice must be served upon:

Registrar*
Ontario Land Tribunal
655 Bay Street, Suite 1500
Toronto, Ontario
M5G 1E5
OLT.Registrar@ontario.ca

and

The Minister of the Environment,
Conservation and Parks
777 Bay Street, 5th Floor
Toronto, Ontario
M7A 2J3

and

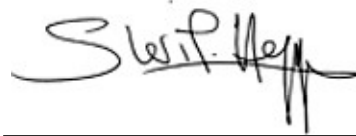
The Director appointed for the purposes of
Part II.1 of the *Environmental Protection Act*
Ministry of the Environment,
Conservation and Parks
135 St. Clair Avenue West, 1st Floor
Toronto, Ontario
M4V 1P5

*** Further information on the Ontario Land Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349 or 1 (866) 448-2248, or www.olt.gov.on.ca**

This instrument is subject to Section 38 of the *Environmental Bill of Rights*, 1993, that allows residents of Ontario to seek leave to appeal the decision on this instrument. Residents of Ontario may seek leave to appeal within 15 days from the date this decision is placed on the Environmental Registry. By accessing the Environmental Registry at <https://ero.ontario.ca/>, you can determine when the leave to appeal period ends.

The above noted activity is approved under s.20.3 of Part II.1 of the *Environmental Protection Act*.

DATED AT TORONTO this 26th day of September, 2025

A handwritten signature in black ink, appearing to read 'Sherif Hegazy', written over a horizontal line.

Sherif Hegazy, P.Eng.

Director

appointed for the purposes of Part II.1 of the
Environmental Protection Act

MW/

c: District Manager, MECP York-Durham
Kris Mask, Pinchin Ltd.
Julie Beneteau, Pinchin Ltd.