

**AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL**

NUMBER 0325-8F8HLY  
Issue Date: May 29, 2026

Re-Eco Tech Electronic Conversions Ltd. operating as ERS International  
3-15 2450 Lawrence Ave E  
Toronto, Ontario  
M1P 2R7

Site Location: 2450 Lawrence Avenue East  
2450 Lawrence Ave E  
Toronto City,  
M1P 2R7

*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 waste processing Site, which includes:

- the processing of waste electronics and electrical equipment (WEEE) from industrial, commercial and institutional (IC&I) sources;
- the receipt and handling of electronic vaping devices and nicotine liquid cartridges and vials;
- The receipt, storage and transfer of liquid nicotine (Waste Class 261A); and,
- the use of conveyors, cyclones and grinders, and other equipment including but not limited to a chain impact separator, an eddy current separator, a granulator, and a vibrating sieve (or equivalent) for the size reduction and separation of e-waste.

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

1. "Act" and "EPA" mean the Environmental Protection Act, R.S.O. 1990, C.E-19, as amended;
2. "Approval" means this Environmental Compliance Approval and any Schedules to it, including the application and supporting documentation listed in Schedule "A";
3. "Company" and "Owner" mean Re-Eco Tech Electronic Conversions Ltd. operating as ERS International, including its officers, employees, agents or contractors;
4. "competent" and "trained" means an employee who has received training, through instruction and practise, in accordance with Condition 13.0, (1) and (2) and is knowledgeable and able to carry out any

- necessary duties;
5. "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 V of the Act;
  6. "District Manager" means the District Manager, MECP Toronto District Office, Central Region of the Ministry;
  7. "waste electrical and electronic equipment" and "WEEE" means a device that is a waste, that required an electric current to operate and includes household appliances, information technology equipment, telecommunications equipment, audio-visual equipment, toys, leisure equipment, sport equipment, electrical or electronic tool and instruments as listed in Schedules 1 through 7 of Ontario Regulation 393/04 made under the Waste Diversion Act, 2002 and other similar electronics;
  8. "Ministry" and "MECP" means the Ontario Ministry of the Environment, Conservation and Parks;
  9. "OWRA" means the Ontario Water Resources Act, R.S.O. 1990, c. O.40, as amended;
  10. "Operator" means any person, other than the Owner's employees, authorized by the Owner as having the charge, management or control of any aspect of the Site;
  11. "PA" means the Pesticides Act, R.S.O. 1990, c. P-11, as amended from time to time;
  12. "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 Act or section 17 of PA;
  13. "processed waste" means waste that has gone through a complete processing operation and is destined for an end user;
  14. "Regulation 347" means Regulation 347, R.R.O. 1990, General - Waste Management, made under the Act, as amended from time to time;
  15. "residual waste" means waste that is destined for final disposal;
  16. "Site" means the operation being approved under this Approval, located in a 0.7 hectare (approximate) area located at 2450 Lawrence Avenue East, Units 3-15, Toronto City, Ontario;
  17. "unprocessed waste" means waste which has not gone through a complete processing operation.

*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 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. Any non-compliance constitutes a violation of the Environmental Protection

Act, R.S.O. 1990 and is grounds for enforcement.

3. Construction and installation of the aspects of the Site described in Schedule "A" must be completed within 5 years of the later of:
  - a. the date this Approval is issued; or
  - b. if there is a hearing or other litigation in respect of the issuance of this Approval, the date that this hearing or litigation is disposed of, including all appeals.
4. This Approval ceases to apply in respect of the aspects of the Site noted above that have not been constructed or installed before the later of the dates identified in Condition 1.0, (3) above.

## **2.0 Build, etc. in Accordance**

1. Except as otherwise provided for in this Approval, the Site shall be designed, developed, built, operated and maintained in accordance with the application for this Approval, and the supporting documentation listed in Schedule "A".

## **3.0 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 "A", 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 "A", other than the application, the document bearing the most recent date shall take precedence.
4. The conditions of this Approval are severable. If any condition of this Approval, or the application of any condition of this Approval to any circumstance, is held invalid or unenforceable, the application of such condition to other circumstances and the remainder of this Approval shall not be affected thereby.

## **4.0 Other Legal Obligations**

1. The issuance of, and compliance with, this Approval does not:
  - a. relieve any person of any obligation to comply with any provision of any applicable statute, regulation, bylaw 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. The Owner shall ensure that all equipment discharging to air operating at the Site are approved under Section 9 of the Act.
3. The Owner shall ensure environmentally sound disposal of all waste received at this Site.

## **5.0 Adverse Effect**

1. The Owner shall take steps to minimize and ameliorate any adverse effects on the natural environment or impairment of water quality resulting from the Site, including such accelerated or additional

monitoring as may be necessary to determine the nature and extent of the effect or impairment.

2. Despite a Owner, Operator, 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 to the natural environment or impairment of water quality.

## **6.0 Change of Owner**

1. The Owner shall notify the Director, in writing, and forward a copy of the notification to the District Manager, within 30 days of the occurrence of any changes in the following information:
  - a. the ownership of the Site;
  - b. the appointment of, or a change in, the Operator of the Site;
  - c. the name or 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, 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 and sufficient financial assurance is deposited with the Ministry to ensure that these conditions will be carried out.
3. In the event of any change in ownership of the works, 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.

## **7.0 Financial Assurance**

1. Within thirty (30) days of issuance of this Approval the Owner shall submit financial assurance, as defined in Section 131 of the EPA, to the Director such that the total amount held by the Ministry is \$40,688 This financial assurance shall be in a form acceptable to the Director and shall provide sufficient funds for the analysis, transportation, clean-up and disposal of all quantities of waste on the Site at any one time, and any required long-term monitoring or security.
2. Commencing on March 31, 2031 and at intervals of five (5) years thereafter, the Owner shall provide to the Director a re-evaluation of the amount of the financial assurance to facilitate the actions required under Condition 7.0, (1). 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 twenty (20) days of written acceptance of the re-evaluation by the Director.
3. 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 Owner shall forthwith replace the financial assurance with cash.

## **8.0 Inspections**

1. No person shall hinder or obstruct a Provincial Officer from carrying out any and all inspections authorized by Section 156, 157 or 158 of the Environmental Protection Act , Section 15, 16 or 17 of the Ontario Water Resources Act , R.S.O. 1990, or Section 19 or 20 of the Pesticides Act , R.S.O. 1990, as amended from time to time, of any place to which this Approval relates, and without limiting the foregoing:
  - a. to enter upon the premises where the approved works are located, 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; and
  - e. to sample and monitor for the purposes of assessing compliance with the terms and conditions of this Approval or the Act, the OWRA or the PA.

## **9.0 Information and Record Retention**

1. The Owner shall ensure that all communications/correspondence made pursuant to this Approval include reference to the Approval number.
2. Any information requested, by the Ministry, concerning the Site and its operation under this Approval, including but not limited to any records required to be kept by this Approval shall be provided to the Ministry, upon request, in a timely manner.
3. 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 conditions of this Approval or any statute, regulation or other legal requirement; or
  - b. acceptance by the Ministry of the information's completeness or accuracy.
4. Any information relating to this Approval and contained in Ministry files may be made available to the public in accordance with the provisions of the Freedom of Information and Protection of Privacy Act, R.S.O. 1990, C. F-31.
5. All records and monitoring data required by the conditions of this Approval shall be kept on the Owner's premises for a minimum period of five (5) years from the date of their creation.

## **10.0 Site Operations**

1. The Owner shall operate the Site under following conditions:
  - a. No waste other than waste electrical and electronic equipment, fluorescent tubes, compact fluorescent lamps, intact batteries (for transfer only to a battery recovery facility), electronic vaping devices and nicotine liquid cartridges, vials, and bulk liquid nicotine in sealed containers

all from industrial, commercial and institutional sources, shall be accepted at the Site.

- b. The processing facility may receive up to 120 tonnes of waste per day.
  - c. The maximum amount of unprocessed waste, processed waste and residual waste stored on Site at any time shall not exceed 608 tonnes.
  - d. Of the maximum amount of waste permitted to be stored on Site at any time, no more than 8,325 litres shall consist of nicotine liquid contained in drums, individual cartridges and vials and stored, as described in Items 14 and 18 of Schedule "A".
  - e. Notwithstanding part (d) of this condition, the maximum amount of bulk liquid nicotine storage in drums, excluding the individual cartridges and vials, shall not exceed two (2) tonnes at any time.
  - f. Notwithstanding part (e) of this condition, the Owner shall ensure that all liquid nicotine stored in 205-litre drums is managed in a manner that prevents spills, leaks, or releases to the environment. At a minimum:
    - i. All drums shall be kept tightly closed and sealed at all times;
    - ii. Each drum shall be shrink-wrapped or otherwise securely sealed to prevent accidental opening or leakage;
    - iii. All drums shall be stored on spill pallets or within secondary containment systems capable of containing any releases from the drums;
    - iv. Spill pallets or containment systems shall be maintained in good condition and free of accumulated liquids; and
    - v. Drums shall be stored indoors in a manner that prevents damage, tipping, or exposure to conditions that may compromise container integrity.
  - g. The Owner shall ensure that any damaged, leaking, or compromised containers of liquid nicotine at a minimum are:
    - i. immediately identified and isolated;
    - ii. placed in leakproof containers with secondary containment; and
    - iii. managed and disposed of in accordance with Regulation 347.
  - h. The Site is approved to accept waste from North America, Europe (inclusive of the British Isles), Asia, the Caribbean and South America.
    - i. Incoming waste shall be inspected by a competent person prior to being received at the Site to ensure that the Site is approved to accept that type of waste.
2. The Site is approved to accept waste Monday through Friday between the hours of 7 a.m. to midnight, subject to municipal by-law restrictions. The Site shall be secured to prevent access to the Site during any hours that the Site is not operating.
  3. The Owner shall post signs in prominent locations at the Site setting out:
    - a. the approved hours of operation of the Site;

- b. the name of the owner of the Site; and
  - c. the name and telephone number that can be used to contact the owner in the event of a complaint or an emergency.
4. The Owner shall ensure that all of the wastes generated at the Site are handled and disposed of in accordance with the EPA, Regulation 347 and the conditions of this Approval.
5. Outdoor storage shall be limited to non-hazardous residual waste and scrap metal only, stored exclusively in two (2) 40-yard leakproof containers. The containers must be covered upon the completion of each operating day to prevent wind-blown litter and contamination of run-off.
6. The Owner shall ensure that all waste materials, including waste electrical and electronic equipment, vaping devices, and liquid nicotine, are stored indoors at all times except for the outdoor storage permitted under Condition 10.0, (5) above.
7. No later than 60 days following the issuance of this Approval, the Owner shall contact the local fire service authority and request confirmation that all indoor waste storage meets the requirements of the Fire Code. Any deficiencies noted by the local fire service authority shall be corrected promptly, and any substantial changes to waste operations required shall be submitted to the Director for approval forthwith.
8. Within 60 days of the issuance of this Approval, the Owner shall prepare and submit a Fire Safety Plan to the local Fire Department for review and approval. A copy of the Fire Safety Plan, once accepted by the Fire Department, shall be provided to the District Manager within fifteen (15) days and maintained on-site at all times. A copy of the approved Fire Safety Plan shall be kept on-Site.
9. If any incoming waste load is known to, or is discovered to, contain unacceptable waste, that load shall not be accepted at the Site. If any unacceptable waste is discovered on-site, that waste shall immediately be disposed of in accordance with Regulation 347.
10. The Owner shall ensure that all appropriate measures are taken to prevent the generation of airborne contaminant emissions, including dust, from the Site. If airborne contaminant emissions from the Site cause or have the potential to cause an adverse effect, as defined in the Act, immediate action shall be taken by the Owner to abate the emission. If, in the opinion of the District Manager, these measures do not abate the emission, and if the District Manager provides written notice to the Owner, receipt and processing of waste at the Site shall cease immediately until the cause of the emission has been abated to the satisfaction of the District Manager.
11. The Owner shall ensure that all wastes transported to and from the Site are transported in accordance with the Act and Regulation 347.
12. The Owner shall ensure that the Site is not operated unless all air approvals under Section 9 of the Act, where applicable, have been obtained.
  - a. At no time is burning or incineration of any materials allowed on the Site.
13. The Owner shall ensure that the waste management activities undertaken at this Site are limited to:
  - a. receipt of waste;
  - b. manual testing, dismantling and sorting of waste excluding batteries;

- c. mechanical dismantling, size reduction and sorting limited to shredding, magnetic separation, air separation and/or compaction of waste electronic and electrical equipment;
  - d. fluorescent lamp breakage;
  - e. temporary storage of waste;
  - f. transfer of processed waste, residual waste and any electronics or electronic components destined for resale;
  - g. transfer of intact batteries to a battery recovery facility approved by the Ministry, or by the corresponding authority if in a jurisdiction other than Ontario, to accept that type of waste;
  - h. the unpackaging, sorting and removal of nicotine liquid cartridges/vials from electronic vaping devices.
  - i. the receipt, storage and transfer of containers of bulk liquid nicotine (Waste Class 261A).
  - j. Prior to the mechanical dismantling, size reduction or sorting of waste electrical and electronic equipment, the Owner shall ensure that all hazardous components, including but not limited to batteries and leaded glass, are manually removed from the waste electrical and electronic equipment.
14. The Owner shall implement procedures for the safe handling and storage of batteries, including:
- a. all batteries shall remain intact;
  - b. batteries shall be stored separately, in a designated location identified with appropriate signage;
  - c. large batteries (e.g. vehicle batteries) shall be stored on pallets, gaylords or other container which permit the batteries to be stored upright and are equipped with spill tray to contain leaks;
  - d. smaller batteries shall be stored separately by type (i.e. lithium batteries stored separately from nickel-cadmium batteries etc) and in manner which prevents spontaneous ignition of stored batteries.
15. The Owner shall ensure that no queuing of trucks occurs on municipal roads.
16. The Owner shall ensure that the Site is operated in a manner that controls and mitigates nuisance impacts, including but not limited to dust, noise, odour, litter, and pests, and prevents adverse impacts on nearby receptors.

### **11.0 Security**

- 1. The Owner shall develop a Site Security Plan and that includes frequent adequate routine surveillance of any trailer and/or container storage areas, all outside material storage locations and the surrounding property in case of fire or leakage that may result in discharges to the Site storm drainage system that may enter the environment.
- 2. The Site shall be maintained in a secure manner, such that unauthorized vehicles/ persons cannot enter the Site.

### **12.0 Inspection and Maintenance**

- 1. The Owner shall conduct regular inspections of the equipment and facilities to ensure that all relevant

processing and storage equipment and facilities at the Site are maintained in good working condition at all times. The inspections shall include, but not be limited to:

- a. daily visual inspections of all waste storage areas to verify the integrity and security of storage bins;
  - b. daily inspections of all liquid storage containers and containment systems for leaks, structural integrity and proper labelling and segregation; and,
  - c. on a regular basis, inspection of all storage and processing facilities, ensuring storage capacity is not exceeded and waste materials are regularly collected, processed and transported for recycling and disposal.
2. Results of the inspections noted above shall be made available for inspection by a Provincial Officer upon request. Any deficiencies detected during these regular inspections, examinations or tests must be promptly corrected.
  3. The Owner shall develop and implement a preventative maintenance program for all on-site equipment associated with the processing and managing of waste and/or processed materials. The preventative maintenance program shall be available on Site for inspection by a Provincial Officer upon request.

### **13.0 Training**

1. The Owner shall ensure that trained staff are on duty at all times when the Site is open to ensure proper supervision of all activities.
2. All Staff, directly involved with activities relating to the Site shall be trained, and receive annual refresher training with respect to the following:
  - a. terms, Conditions and operating requirements of this Approval;
  - b. operation and management of the Site, or area(s) within the Site, as per the specific job requirements of each individual operator, and which may include procedures for receiving, screening, refusal, handling and temporarily storing wastes;
  - c. shipping and manifesting procedures, if such functions fall within the job requirements of an individual operator;
  - d. an outline of the responsibilities of Site personnel including roles and responsibilities during emergencies and spills;
  - e. the emergency response plan and contingency plan including exit locations and evacuation routing, and location of relevant equipment available for emergencies and spills;
  - f. environmental, and occupational health and safety concerns pertaining to the wastes to be transferred;
  - g. emergency first-aid information;
  - h. relevant waste management legislation and regulations, including the Act, Regulation 347, Ontario Regulation 463/10 and Workplace Hazardous Materials Information System (WHMIS);
  - i. proper training in the acceptance, equipment use and storage of refrigerants;

- j. documentation, reporting and recording procedures as required under Condition 17.0, (1) and (2) ;
- k. equipment and Site inspection procedures, as required under Condition 12.0 (1); and
- l. procedures for recording and responding to public complaints as required under Condition 16.0 (1).

#### **14.0 Contingency Planning and Emergency Response**

1. The Owner shall prepare and maintain a detailed Contingency and Emergency Response Plan for the operation of the processing Site. The Plan shall include, but not necessarily limited to:
  - a. A list of emergency response personnel, such as Re-Eco Tech Electronic Conversions Ltd. (operating as ERS International) Emergency Coordinator/s, Incident Commander or designate, who will be on-site during all operating hours;
  - b. as-built drawings which accurately reflect the final Site plan layout and clearly indicate all storage areas;
  - c. emergency response procedures to be undertaken in the event of a fire, medical emergency or process upset;
  - d. a list of contingency equipment and spill clean up materials, including names and telephone numbers of companies available for emergency response;
  - e. a notification protocol, with names and telephone numbers of persons to be contacted, including Re-Eco Tech Electronic Conversions Ltd. (operating as ERS International) staff Emergency Coordinator, the Ministry's Spills Action Centre and District Office, the local Fire and Police Departments, the local Municipality, the local Medical Officer of Health and the Ministry of Labour;
  - f. the procedures to be followed in the event of a labour disruption, transportation disruption, inability of receiving sites to accept waste or other business disruption to the operation; and
  - g. a Fire Safety Plan in accordance with Section 2.8 of the Ontario Fire Code, A WHMIS and Fire Safety Plan Box shall be installed at an approved location accessible to responding fire crews.
2. A copy of the Contingency and Emergency Response Plan shall be kept on the Site at all times, in a central location available to all staff, and a copy shall be submitted to the District Manager, the local Municipality and the Fire Department by no later than 60 days following the issuance of this Approval;
3. The Owner shall ensure that the contingency equipment and materials outlined in the Contingency and Emergency Response Plan are immediately available on the Site at all times, in a good state of repair, and fully operational;
4. The Owner shall ensure that all operating personnel are fully trained in the use of the contingency equipment and materials outlined in the Contingency and Emergency Response Plan, and in the procedures to be employed in the event of an emergency;
5. The Owner shall maintain on-Site and in a prominent location, a Site plan identifying:
  - a. location of all hazardous waste and flammable materials storage areas;
  - b. location of all recyclable materials storage areas;

- c. the location of all floor drains.
6. The Owner shall review and update the emergency response plan on an annual basis as a minimum. In particular the Owner shall ensure that the names and telephone numbers of the persons to be contacted as required under Condition 14.0 (1)(e) are up-to-date.

### **15.0 Emergency Response**

1. The Owner shall take immediate measures to clean-up all spills, related discharges and process upsets of wastes which result from the operation of the Site. All spills and upsets shall be immediately reported to the Ministry's Spills Action Centre at (416) 325-3000 or 1-800-268-6060 and shall be recorded in a written log or an electronic file format, referred to in Condition 14.0 (1) of this Approval, as to the nature of the spill or upset, and the action taken for clean-up, correction and prevention of future occurrences.

### **16.0 Complaints**

1. If at any time the Owner receives complaints regarding the operation of the Site, the Owner shall respond to these complaints according to the following procedure:
  - a. The Owner shall record and number each complaint, either electronically or in a log book, and shall include the following information:
    - i. the nature of the complaint;
    - ii. the name, address and the telephone number of the complainant if the complainant will provide this information;
    - iii. the time and date of the complaint; and
    - iv. the waste management activities which are occurring during the time 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.
  - c. The Owner shall complete and retain on-site a report written within one (1) week of the complaint date, listing the actions taken to resolve the complaint and any recommendations for remedial measures, and managerial or operational changes to reasonably avoid the recurrence of similar incidents.

### **17.0 Record Keeping**

1. Daily records shall be maintained by the Owner, in written or electronic format, which will include at a minimum:
  - a. the source, type and amount of waste received;
  - b. the type, amount and destination of all processed waste and residual waste shipped from the Site;
  - c. quantities of unprocessed waste, processed waste and residual waste present on Site;
  - d. quantities of WEEE present on Site;
  - e. the details of any spills and mitigative actions undertaken, as required by Condition 14.0 (1);

- f. quantities of any bulk liquid nicotine received and stored on Site or shipped off-site.
2. A written record must be maintained at the Site, which includes, but is not limited to, the following:
  - a. name and signature of trained personnel conducting the inspection;
  - b. date and time of the inspection;
  - c. list of equipment inspected and all deficiencies observed;
  - d. a detailed description of the maintenance activity;
  - e. date and time of maintenance activity; and,
  - f. recommendations for remedial action and actions undertaken.
3. The Owner, in addition to inspections and documentation requirements carried out in Conditions 17.0 (1) and (2) of this Approval, must conduct and record on each operating day, visual inspection of the following areas to ensure the Site is secure and that no off-site impacts such as vermin, vectors, odour, noise, dust and litter, result from the operation of the Site :
  - a. waste loading/unloading areas and associated containment areas; and,
  - b. waste storage areas and associated containment areas.

## **18.0 Annual Report**

1. By March 31, 2027, and annually thereafter, the Owner shall prepare an annual report for the previous calendar year, and maintain a copy on-site for inspection or review upon request. Each report shall include, at a minimum, the following information:
  - a. a detailed monthly summary of the type, quantity and origin of all wastes received, and processed at the Site, including the destination, type and quantity of waste destined for final disposal and also including any reconciliations on mass balance made;
  - b. any environmental and operational problems that could negatively impact the environment, encountered during the operation of the Site and during the facility inspections, and any mitigative actions taken;
  - c. a statement as to compliance with all Conditions of this Approval and with the inspection and reporting requirements of the Conditions herein;
  - d. any recommendations to minimize environmental impacts from the operation of the Site and to improve Site operations and monitoring programs in this regard; and,
  - e. a revised estimate of Financial Assurance necessary for the Site as described in Condition 7.0 (1) of this Approval.

## **19.0 Stormwater Management**

1. The Owner shall manage all direct discharges from this Site including stormwater run-off and firewater run-off in the event of a fire, in accordance with appropriate Municipal, Provincial and or Federal Legislation, Regulations and By-laws.
2. Existing floor drains shall be sealed, preventing spilled contaminated liquid from entering the sanitary

sewer system.

## **20.0 Closure Plan**

1. The Owner must submit, for approval by the Director, a written Closure Plan for the Site, no less than six (6) months prior to closure of the Site. This Closure 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 the completion of the work.
2. Within ten (10) days after closure of the Site, the Owner must notify the Director, in writing, that the Site is closed and that the Site closure plan has been implemented.

## Schedule "A"

This Schedule "A" forms part of this Approval:

1. Application for a Certificate of Approval for a Waste Electronic and Electrical Equipment Processing facility received on November 8, 2010, which includes a Site Plan, Reference Plan and Property Description, Consent of Property Site Owner, Record of Public Consultation Report, Ontario Electronic Stewardship Agreement, Quality & Environmental Management Systems Manual and all other accompanying documentation, received on November 8, 2010 and signed by Sam Kazemeini, President, JJS Developments Ltd.
2. Email with updated tonnages and Financial Assurance re-evaluation, sent by Jim Sanderson on Monday, April 4, 2010.
3. Environmental Compliance Approval Application, signed by S. Kazemeini, President, dated September 29, 2012.
4. Design and Operations Report, Waste Electronic and Electrical Equipment Processing and Fluorescent Lamp Recycling, Revision 1, JJS Developments Ltd., o/a Electronics Recycling Services, prepared by Altech Environmental Consulting Ltd., dated February 6, 2013.
5. Email dated February 22, 2013, from M. LaPlante, Altech Environmental Consulting Ltd., to MOE re: revisions to the Design and Operations Report with attached revised Site Plan and Roof Layout and revised pages 3, 4, 9, 10, 11 and 12.
6. Email dated March 5, 2013, from M. LaPlante, Altech Environmental Consulting Ltd., to MOE re: change in service area.
7. Environmental Compliance Approval Application, signed by S. Kazemeini, President, dated November 28, 2013.
8. Design and Operations Report, Waste Electronic and Electrical Equipment Processing and Fluorescent Lamp Recycling, JJS Developments Ltd., o/a Electronics Recycling Services, prepared by Altech Environmental Consulting Ltd., dated November 28, 2013.
9. Email dated December 18, 2013, from J. Sanderson to MOE requesting the addition of intact batteries for transfer to the list of wastes approved for receipt at the Site.
10. Email dated February 21, 2014, from J. Sanderson to MOE requesting that the service area include South America.
11. Environmental Compliance Approval application dated August 11, 2020 including all supporting documentation.
12. Email dated November 6, 2020 from Ethan Jiao, M.Eng., Altech Environmental Consulting Ltd., with additional information on the sources and handling of vaping devices and nicotine liquid cartridges and vials, confirmation that liquid cartridges and vials will not be opened or drained, and an updated site plan showing storage areas for the waste.
13. The document "Environmental Compliance Approval Application – Materials Processing / Transfer Facility dated January 14, 2026, prepared by Cambium for Re-Eco Tech Electronic Conversions Ltd. o/a ERS International, including the Environmental Compliance Approval Application Form (Attachement 2),

Design and Operations Plan (Attachement 10) and Financial Assurance Estimate (Attachement 11)

14. Email dated April 13, 2026 from Gary Mulion C.E.T., Cambium to MECP providing additional information on ECA amendment application and Design and Operation Report
15. Email dated April 15, 2026 from Gary Mulion C.E.T., Cambium to MECP providing additional information on liquid nicotine quantities and balance stored on Site.
16. Email dated May 13, 2026 from Gary Mulion C.E.T., Cambium to MECP providing Updated Financial Assurance Calculations.
17. Email dated May 13, 2026 from Gary Mulion C.E.T., Cambium to MECP providing clarification on site address.
18. Email dated May 26, 2026 from Gary Mulion C.E.T., Cambium to MECP providing justification on proposed nicotine storage location within the Site.

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

1. The reason for Conditions 1.0 (1, 2, and 3), 4.0 (1, 2, and 3), 5.0 (1 and 2) is to clarify the legal rights and responsibilities of the Owner under this Approval.
2. The reason for Condition 2.0 (1) is to ensure that the Site is designed, operated and maintained 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.
3. The reason for Conditions 3.0, (1, 2, 3 and 4) is to clarify how to interpret this Approval in relation to the application and supporting documentation submitted by the Owner.
4. The reason for Condition 6.0 (1) to ensure that the Site is operated under the corporate name which appears on the application form submitted for this approval.
5. The reason for Condition 6.0 (2) is to restrict potential transfer or encumbrance of the Site without the approval of the Director. Transfer of encumbrance can be made only on the basis that it will not endanger compliance with this Approval.
6. The reason for Condition 6.0 ( 1 to 3) is to ensure that subsequent owners of the Site are informed of the terms and conditions of this Approval. This also applies to all supporting documentation listed in Schedule "A".
7. The reason for Conditions 7.9 (1 to 3) is 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.
8. The reason for Condition 8.0 (1) is to ensure that appropriate Ministry staff have ready access to the Site for inspection of facilities, equipment, practices and operations required by the conditions in this Approval. This condition is supplementary to the powers of entry afforded a Provincial Officer pursuant to the Act and OWRA.
9. The reason for Condition 9.0 ( 1 to 5) is to ensure the availability of records and drawings for inspection and information purposes.
10. The reason for Condition 10.0 (1) is to ensure that the types and quantities of waste received at the Site are in accordance with that approved under this Approval.
11. The reason for Condition 10.0 (2) is to define the operating hours of the Site.
12. The reason for Conditions 10.0 (3 to 8) and 17.0 (3) is to ensure that the site is operated in a manner

- which does not result in a nuisance or a hazard to the health and safety of the environment or people.
13. The reason for Condition 10.0 (9 to 10) is to ensure that only waste approved under this Approval are received at the Site and airborne contaminant emissions are prevented or controlled.
  14. The reason for Condition 10.0 (11) is to ensure waste materials are transported according to the requirements of the Regulation.
  15. The reason for Condition 10.0 (12) is to ensure the Site is operated according to air approvals obtained.
  16. The reason for Condition 10.0 (13) is to clarify the waste management activities approved at this Site in accordance with the application and supporting documentation submitted by the Owner.
  17. The reason for Condition 10.0 (14) is to ensure that hazardous components are removed from WEEE prior to mechanical manipulation. Failure to remove hazardous components may create an unsafe work environment at the Site.
  18. The reason for Condition 10.0 (15) is to ensure that batteries are stored in a manner which minimizes the risk of spills or spontaneous fires.
  19. The reason for Condition 10.0 (16 and 17) is to ensure the safe operation of the Site.
  20. The reason for Condition 11.0 (1 and 2) is to ensure access to the Site by unauthorized persons and to prevent vandalism or theft.
  21. The reason for Condition 12.0 (1 to 3) is to ensure that all equipment and facilities are maintained in good working order.
  22. The reason for Condition 13.0 (1 and 2) is to ensure that the Owner's staff are properly trained in the operation of the equipment used at the Site, emergency response procedures and applicable legislation and regulations.
  23. The reasons for Condition 14.0 (1 to 6) are to ensure that the Owner follows a plan with an organized set of procedures for identifying and responding to unexpected but possible problems at the Site and also to ensure that the Owner is prepared and properly equipped to take action in the event of a spill, fire or other operation upset.
  24. The reason for Condition 15.0 (1) is to ensure that the Owner immediately notifies the Ministry of any spills as required in Part X of the Act so that appropriate spills response can be determined.
  25. The reason for Condition 16.0 (1) is to ensure that any complaints regarding operations at this Site are responded to in a timely and efficient manner.
  26. The reason for Conditions 17.0 (1 to 3) and 18.0 (1) is to ensure that the Owner keeps records of the appropriate information and submits an annual summary report to this Ministry so that the operation can be evaluated to ensure compliance.
  27. The reason for Condition 19.0 (1 and 2) is to ensure the Owner manages all discharges and water run-offs at the Site.
  28. The reason for Condition 20.0 (1 and 2) is to ensure that the Site is closed in accordance with Ministry standards and to protect the health and safety of the public and the environment.

**Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s).  
0325-8F8HLY issued on August 23, 2024**

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.

Pursuant to subsection 139(3) of the *Environmental Protection Act*, a hearing may not be required with respect to any terms and conditions in this environmental compliance approval, if the terms and conditions are substantially the same as those contained in an approval that is amended or revoked by this environmental compliance approval.

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](http://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 29th day of May, 2026



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Mohsen Keyvani, P.Eng.

Director

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

NS/

c: District Manager, MECP Toronto - District  
Gary Muloin CET, Cambium Inc.