

**Terrapure Environmental Response to
Proposed Project List for comprehensive environmental assessments
under the Environmental Assessment Act (EAA)**

Ministry of the Environment, Parks and Conservation

ERO Number: 019-2377

Introduction

Terrapure Environmental is pleased to respond to the Proposed Project List for comprehensive environmental assessments under the Environmental Assessment Act. In general, Terrapure supports the Ministry's effort to streamline, modernize and shorten the EA process, particularly for projects in the waste sector.

In a highly regulated industry such as Terrapure's, we are at the frontline of cumbersome and arduous processes that need to be simplified, sped up and cost less. As more of these processes are modernized, businesses like ours will be in an even better position to support the goal of strengthening Ontario's economy, crucially as we come out of and recover from the pandemic, while protecting the environment.

Terrapure and its Role

Terrapure Environmental is a leading Canadian provider of professional, cost-effective environmental and industrial services and recycling solutions that help address industry's environmental challenges. With an unwavering focus on environmental, health and safety excellence, the company provides services that minimize waste and maximize the recovery or recycling of valuable industrial by-products through a coast-to-coast network of facilities and on customer sites. Our presence in Ontario is significant to Terrapure nationally, with 25 locations employing over 750 people, including the only lead acid battery recycler west of Quebec, an industrial waste landfill and number of specialty material handling, recycling and disposal facilities. Our head office is in Burlington.

Prioritization and Streamlining in the Waste Sector

Terrapure applauds that Bill 197 stated that comprehensive environmental assessments will only be required for projects that are designated and Terrapure would like to offer its expertise to shape this.

Terrapure's position is that we agree that the easiest and simplest way to action this is through the development of a list of projects or proposals that require a comprehensive environmental assessment and those that do not and should be subject to a streamlined process.

Project proposals should be triaged and those that are large-scale projects with unknown environmental effects should require a comprehensive EA. Like many from the waste sector, proposals and projects that are repetitive or an evolution of an existing project that are associated with mature science, proven mitigation measures and known effects should not be captured in the list of projects requiring a comprehensive EA. These projects should be on the streamlined list which will help free up staff resources so they can be reassigned to higher need areas and projects within the ministry where there are delays.

Terrapure is eager to assist the government in developing these lists as it should not take 5-10 years to expand a waste facility while both the government and proponent incur significant costs and a drain on resources.

The Benefit of Predictable Timelines

One of Terrapure's long standing positions has been to advocate for predictable and consistent timelines in any permitting application process. We feel that the regulation-making process to follow Bill 197 is the ideal time to ensure predictable timelines for proponents and that the development of project lists for comprehensive and streamlined EAs will help achieve this.

Proponents need a level of certainty around timelines so they can plan their next steps and reasonably estimate time to market. The last decade of project proposal review has seen delays that cost us and our industry significant resources. This can be remedied with a few minor changes that will make timelines far more predictable and give a level of certainty to the sector. Changes such as repurposing staff to higher need divisions who have been freed up from a successful project prioritization and streamlining initiative will alleviate the backlog and help timelines.

Another way to work towards predictable timelines is to regulate because without predictable timelines, a number of Bill 197's initiatives will become constrained.

Terrapure feels there are several regulated ways to make review timelines more predictable, such as:

- Legislating service standards so they must be adhered too
- Modifying the comprehensive EA process with timelines for review
- Moving to a template for project proposal descriptions