

**Waste Connections of Canada 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

Waste Connections of Canada (WCC) is pleased to respond to the Proposed Project List for comprehensive environmental assessments under the Environmental Assessment Act. In general, Waste Connections 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 ours, 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.

Waste Connections believes that to recover from this pandemic we will need to increase business competitiveness, confidence and certainty and that it is possible to strengthen Ontario's economy while protecting the environment. Our response focuses on achieving these goals.

Waste Connections of Canada and its Role

Waste Connections is the premier provider of solid waste collection, transfer, recycling and disposal services in primary and secondary markets across Ontario, Canada and the US, serving millions of customers daily. Whether it is single or multi-family residences, commercial institutions, industrial locations, construction sites or special events, Waste Connections can provide the service.

Waste Connections of Canada is a subsidiary of Waste Connections, which is traded on both the TSX and NYSE, and is the 3rd largest industrial traded company in Canada. In the US we have exposure in 33 of the 50 states. We own and operate 2 landfill sites in Ontario and employ over 1200 people across the Province in approximately 20 locations.

Our main landfill facility in Ontario, the Ridge Landfill, receives non-hazardous industrial, commercial and institutional waste from across the province as well as residential waste from local municipalities. The Ridge employs 23 people and an additional 40 employees who live in surrounding communities and who work in collection operations in the Municipality of Chatham Kent.

Prioritization and Streamlining in the Waste Sector

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

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 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.

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

The Benefit of Predictable Timelines

A lack of consistent or predictable timelines is something that has plagued our sector interaction with the Ministry for decades. 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 EA's 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 redirecting staff to projects with greater needs as a result of a successful project prioritization and streamlining initiative will alleviate the backlog and help timelines.

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

Waste Connections feels there are several regulation options 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