



July 3, 2021

**Sean Avery**  
**Technical Assessment and Standards Development Branch**  
**Ministry of Environment, Conservation and Parks**  
40 St Clair Ave W, 7<sup>th</sup> Floor  
Toronto, Ontario  
[sean.avery@ontario.ca](mailto:sean.avery@ontario.ca)

**RE: Guideline to address odour mixtures in Ontario**

Dear Mr. Avery,

The Hamilton Industrial Environmental Association (HIEA) is a non-profit association representing 14 industrial and manufacturing companies in the City of Hamilton. HIEA's mandate is to improve the local environment through partnerships with government, educational institutions, individual residents, and environmental groups. We also collaborate with our stakeholders to help understand environmental issues and to develop and implement sustainable programs and policies. HIEA members believe their organizations are not only a key contributor to both Hamilton and Ontario's economy, but also an essential part of the fabric of the community.

HIEA member companies provide employment for over 7,300 direct industrial and manufacturing positions as well as an estimated 56,000 indirect jobs in Hamilton and surrounding municipalities. Since its inception in 1998 HIEA and its membership has invested over \$1.1 billion in environmental capital expenses, contributed more than \$720 million in municipal property taxes, and contributed over \$1 million in community and educational activities in Hamilton.

HIEA's members have not only embraced and adopted a circular economy but practice it every day as part of their core business. HIEA members are part of an industrial ecosystem that reuses and recycles member companies' by-products and waste, recovering value and protecting the environment. HIEA and its members are committed to fostering a strong and sustainable future for the Province of Ontario, the City of Hamilton, and all its residents.

The Ministry of Environment, Conservation and Parks (MECP) has published "Guideline to address odour mixtures in Ontario" on the Environmental Registry of Ontario. Through this the MECP is proposing guidance on how industrial facilities, development proponents, and other members of the regulated community can anticipate, prevent, and address odour issues that could be of concern to residents.



HIEA would like to make the following comments on the proposed guidance document:

- MECP has used data gathered from its internal databases to inform the content and policy direction for the Odour Guidance document. The policies and direction including setback requirements are based on this experience. HIEA is concerned as odour, especially in heavily industrialized areas such as North Hamilton, are difficult to identify and properly attribute and as such may be misleading.
- HIEA, from practical experience, is concerned that facilities in heavily industrialized areas are often mistakenly identified as the source of odour complaints by residents. From past knowledge, larger facilities are typically targeted for odour complaints due to their size and ultimately their visibility. As such, using number of complaints against a facility as a “trigger” within the guidance document will lead to unnecessary work and a distraction from achieving environmental outcomes.
- It is noted that the guidance document has an expectation that odour must be included in ESDM reports unless the odours discharged are negligible.
  - No quantitative measures have been established for this baseline.
- The Guidance document indicates that technical bulletins will be used to provide guidance, direction and ensure consistency in the application of odour requirements. There are no final bulletins available. HIEA is concerned that these bulletins will be produced 1) on an ad hoc basis, 2) not on a timely basis, and 3) to address the issue of the day rather than as the foundations for a comprehensive framework.
- It is noted that the odour screening form for Environmental Compliance Approvals identified in Section 3.1 is not available for review and comment as a part of this proposal. HIEA is concerned that this document will not be made available for review until after the guidance document is finalized and published.
- HIEA is concerned that the land use compatibility provisions outlined in the Guideline, when applied in heavily industrialized areas such as north Hamilton, may have unintended consequences in hollowing out the industrial core. New or existing companies would likely not be able to meet set back distances due to the abutting of residential areas on the industrial core. This would likely lead to more greenfield developments away from residential areas.

Thank you for the opportunity to make this submission.

Sincerely,

A handwritten signature in blue ink, appearing to read "Geoffrey Knapper".

Geoffrey Knapper, General Manager  
Hamilton Industrial Environmental Association