

June 14, 2021

Shannon Boland  
Divisional Compliance Branch  
Ministry of Environment, Conservation & Parks  
135 St. Clair Ave West, 8<sup>th</sup> Floor  
Toronto, ON M4V 1P5

Dear Ms. Boland,

**Re: Ontario's Environmental Compliance Policy, Referral Tool, and Service Standards,  
ERO 019-2972**

The Ontario Waste Management Association (OWMA) is the voice of the waste management sector in Ontario. We represent over 250 organizations across the province who manage over 85% of the province's waste.

OWMA commends the Ministry of the Environment, Conservation and Parks (MECP) for updating and modernizing their Compliance Policy, Referral Tool, and Service Standards (Policies) to focus more resources on high-risk incidents and better hold polluters accountable.

OWMA requests clarification on the following provisions to best ensure compliance with the Policies:

**Informed Judgement Matrix**

A timeline is needed for the steps provincial officers will use when determining the appropriate compliance tool to address non-compliance or potential non-compliance. It is understood that individual circumstances may require the provincial officer to vary the recommended compliance tool; however, details must be provided on the factors that would lead to this need for reassessment and the timeline for this reassessment.

**Inspection Reports**

Section 4.1.2 sets out inspection requirements to confirm that people responsible for facilities or special equipment are operating them according to Ontario's laws. A summary of these reports should be publicized grouping facilities by region and sector. Clarification is also needed on the selection process for businesses subject to inspections. All types of businesses should be inspected.

Thank you for considering our request. These clarifications are critical to ensuring proper compliance with the Policies. We would be pleased to further discuss this matter and its importance with you or your staff.

Sincerely,



Mike Chopowick  
Chief Executive Officer