

October 30, 2023

To Whom It May Concern:

**Re: ERO #019-6963      Streamlining environmental permissions for waste management systems under the Environmental Activity and Sector Registry (EASR)**

### **Introduction**

Following is my response to the above review to streamline environmental permissions for waste management under the EASR. The waste materials included in a permit-to-rule regime include asbestos, biomedical waste, treated biomedical waste, hazardous waste, liquid industrial, and treated waste cannot be disposed of on land. Included is in-transit storage of waste based on waste types and operations. Streamlining of waste management will be achieved by allowing more waste management systems to be registered on the EASR and by reducing the burden and application review time since registrants will no longer submit an application that requires a technical review.

Do NOT proceed with this proposal due to:

- Its' non alignment with their MECP's Statement of Environmental Values which states:
  - o "As it considers the development of Acts, regulations and policies, it will consider the cumulative impacts on the environment, the interdependence of air, land water and living organisms, and the relationships among the environment, the economic and society'."
- the proposal favours industry over the public interest and puts human and environmental health at risk. The broad assumption is that impacts will be neutral or common and well understood and standard best practices would be sufficient to address adversities.
- exposing the public to the high risk of serious impacts to human and environmental health due to release and exposure to hazardous waste and cancer causing materials such as PCB's, silica dust and naturally occurring radioactive materials as well as the risk of spread of infectious diseases is irresponsible
- the lack of transparency by MECP has already been noted in the 2021 Auditor General's Value for Money Audit regarding Hazardous Spills (p.2) re:
  - o disclosure of the quantity of hazardous spills and the harm they cause
  - o location of the spill and who caused it
  - o informing the local community and the type of specific impact that may have been caused to human health and the environment
- removing the need for technical reviews risks public trust by perpetuating lack of institutional confidence for protecting the environment and being accountability for the public interest.
- The lack of government oversight or enforcement risks the environment and peoples' health
- lessons learned from the deregulation attempts for drinking water at Walkerton in 2000, resulted in e-coli outbreaks due to contaminated water which are seriously overlooked

Respectfully submitted,

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