



**Canadian Fuels**  
**ASSOCIATION**  
**canadienne des carburants**

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Environmental Policy Branch  
40 St Clair Avenue West  
10th Floor  
Toronto, ON  
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Canada

**Re: ERO #019-9196 – Enabling greater beneficial reuse of excess soil**

On behalf of the Canadian Fuels Association (CFA), we thank you for the opportunity to provide feedback on ERO #019-9196.

CFA represents the producers, distributors and marketers of transportation energy, including gasoline, ethanol, bio-based diesel, jet fuel, as well as, specialty fuels and lubricants. Our sector represents 111,000 workers, fifteen refineries, eight Clean Fuels production facilities, 75 distribution terminals, and 12,000 retail and commercial sites. Our members supply 95% of the transportation fuel Canadians use every day, including the majority of Canada's biofuels. Ontario is home to five refineries located in Southwest Ontario, where we underpin Ontario's petro-chemical cluster, and eight clean fuel production facilities.

Given all of the different kinds of sites which CFA members operate across Ontario to deliver critical transportation energy, CFA appreciates the opportunity to provide feedback on the proposed amendments. As echoed by many in industry, our members have found the costs of the existing regulations burdensome as they seek to reuse excess soil in an environmentally conscious way. These proposed amendments should remediate some of that concern.

**We greatly appreciate the extension of the in-effect date of the landfilling restriction from January 1, 2025 to January 1, 2027.** We are also supportive of the clarified exceptions to the restrictions based on declaration by a qualified person.

With regards to proposed amendment four ("Allow greater reuse of soil to be coordinated between similar infrastructure projects"), our members would like clarity around whether their fuel terminals qualify. It is unclear given the following language:

*"The coordinated project areas and reuse sites are predetermined and identified as part of the same project planning process, and soil management activities are being*

*undertaken concurrently as one coordinated effort across all of the project areas and reuse sites”*

Distribution terminals are a major element in the fuel supply chain, functioning as a key link between fuel production facilities and retail sites/end users. It would be helpful for companies to be able to easily reuse excess soil between terminals without having to undertake “one coordinated effort across all of the project areas and reuse sites.”

CFA thanks you again for this opportunity to provide feedback and we look forward to any opportunity and future opportunities to discuss our concerns.

Sincerely,

A handwritten signature in black ink, appearing to be 'L. Tresise', written in a cursive style.

Landon Tresise  
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