

Member
Municipalities

Township of
Adelaide-Metcalf

Municipality of
Brooke-Alvinston

Municipality of
Chatham-Kent

Township of
Dawn-Euphemia

Township of
Enniskillen

Municipality of
Lambton Shores

Municipality of
Middlesex Centre

Village of
Newbury

Village of
Oil Springs

Town of
Petrolia

Town of
Plympton-Wyoming

Village of
Point Edward

City of
Sarnia

Municipality of
Southwest Middlesex

Township of
St. Clair

Municipality of
Strathroy-Caradoc

Township of
Warwick

May 16, 2025

Dresden Landfill Comments
Environmental Assessment Branch
135 St. Clair Ave W
4th Floor
Toronto, ON M4V 1P5

Via Email: DresdenLandfill@ontario.ca

Re: St. Clair Region Conservation Authority's comments on the "Protect Ontario by Unleashing our Economy Act, 2025" (ERO#025-0389)

The Ontario government is proposing legislation—the *Protect Ontario by Unleashing our Economy Act, 2025*—to exempt the York1 waste project in Chatham-Kent from environmental assessment (EA) requirements. This move, intended to address potential waste capacity issues due to U.S. tariffs, would revoke Ontario Regulation 284/24 and amend the Environmental Assessment Act. While the project would no longer require a comprehensive EA, it would still be subject to strict provincial oversight and approvals under the Environmental Protection Act and Ontario Water Resources Act.

The St. Clair Region Conservation Authority (SCRCA) supports the government's efforts to streamline approvals and enhance Ontario's waste capacity in response to emerging challenges, such as potential U.S. tariffs. The SCRCA remains committed to facilitating responsible development, including waste management infrastructure, while upholding our mandate to protect municipal drinking water sources and the natural environment.

The SCRCA believes that strong environmental safeguards are essential to protecting natural hazard areas and sources of municipal drinking water, both now and in the future. These protections are critical to ensuring safe, resilient, and thriving communities. The SCRCA recommends that the requirements for natural hazard permitting under the Conservation Authorities Act and source protection policies under the *Clean Water Act*, continue to apply.

The subject property is located adjacent to the Fourth Concession Drain Outlet (a Municipal Drain), and Molly Creek (a natural watercourse), which both outlet directly into the East Sydenham River. Portions of the subject property are within the regional storm floodplain. Provincial Policies (Provincial Planning Statement) direct development away from areas of natural or human made hazards where there is an unacceptable risk to public health or safety or of property damage and not create new or aggravate existing hazards.

Portions of the property are regulated under Ontario Regulation 41/24 “*Prohibited Activities, Exemptions and Permits*” made under Section 28 of the *Conservation Authorities Act*. The policies of the Authority regulate development including construction/reconstruction of a structure; placement or removal of fill; regrading; altering a watercourse; altering/developing a shoreline; or interfering with the function of a wetland. Written approval from this Authority will be required in order to undertake any of these activities within the regulated area.

The Thames-Sydenham and Region Source Protection Plan has been approved and is designed to identify and help address drinking water source protection concerns. The Approved Plan, supporting documents and relevant maps are available at: <http://www.sourcewaterprotection.on.ca>. Portions of the subject property have been identified as being within a vulnerable area or an area where drinking water threat policies apply. These policies have been developed with the intent to reduce risks posed by identified water quality and quantity threats. These approved policies are also available on the website.

As the SCRCA has the responsibility of reviewing specific aspects of development activity, it is hoped that environmental concerns as delegated in the aforementioned Acts requires the proponent to consider a range of alternatives to minimize potential encroachment to regulated hazard areas and ground-based water supplies.

Thank you for the opportunity to review and provide comments on the “*Protect Ontario by Unleashing our Economy Act, 2025*” (ERO#025-0389). We would be pleased to further discuss these comments at your convenience.

If you have further questions, please do not hesitate to contact the undersigned.

Sincerely,



Ken Phillips
General Manager / Secretary – Treasurer

cc:
Nicholas Fischer – Conservation Ontario Policy and Planning Liaison