



3 February 2026

Permissions Modernization Team, Client Services and Permissions Branch
135 St. Clair Ave. West, Floor 1, Toronto, ON M4V 1P5
permissions.modernization@ontario.ca

To Whom It May Concern:

The RNG COALITION welcomes the opportunity to respond to the Ministry of the Environment, Conservation, and Parks' (MECP) proposal entitled "Exempting low-risk activities from requiring environmental permissions", ERO number 025-1361. Broadly speaking, the Proposed amendments to Ontario Regulation 347 (General – Waste Management) under the Environmental Protection Act (EPA) are aligned with previous advocacy undertaken by the RNG COALITION and its members, and to that extent we are supportive of these changes. However, we feel that there are further actions MECP could take to reduce the regulatory burden placed on renewable natural gas (RNG) production facilities, while also keeping Ontarians safe and our environment healthy.

A word about us: the RNG COALITION is the trade association for the renewable gas industry in Canada and the United States. Our diverse membership is comprised of nearly 300 leading companies from across the RNG supply chain, including project developers, technology providers, gas marketers, pipeline infrastructure owners, and utilities. Thousands of Ontarians are employed by our members, including by Enbridge Gas, GFL, and at Generate Upcycle's food waste anaerobic digester in London. Together, we advocate for the sustainable development, deployment, and utilization of renewable gas, so that present and future generations may enjoy access to fuels that are clean, renewable, and domestically produced in Canada and around the world.

The comments that follow pertain only to the Proposed amendments to Ontario Regulation 347 (General – Waste Management) under the Environmental Protection Act, hereafter, the Proposed Amendments.

Yours sincerely,

Alexander Ripley

Manager, Government Affairs – Canada
alex@rngcoalition.com

Ontario has the potential to develop a substantial RNG industry, but at the present moment this potential remains largely unrealized. Studies have shown that Ontario could produce up to 257 million gigajoules (GJ) of RNG based on available feedstocks.¹ A more conservative assessment based on feedstocks that are most *commercially viable* — that is, given existing technology and without more competitive uses, such as is the case with corn silage — suggests that nearly 100 million GJ of RNG could be produced annually. These are large volumes either way, which could generate billions of dollars of revenue for producers.

Food waste is another common RNG feedstock. If coupled with a Provincial mandate for organics diversion, an expanded food waste RNG sector could help ensure a secure Made-in-Ontario fuel supply, while also mitigating our growing landfill capacity crisis. Whatever the production pathway, a more dynamic domestic RNG industry stands to positively contribute to economic development across the province, while also helping to solve problems relating to energy, waste, and nutrient management.

While myriad factors on both the demand side and supply side have prevented Ontario's RNG industry from reaching its full potential, a recurring complaint the RNG COALITION has heard from its members surrounds the inefficiency of the Province's handling of complex Environmental Compliance Approvals (ECAs). Against this background, we are very pleased to see that the Ministry is proposing to exempt proponents from requiring a waste ECA for biogas-to-RNG upgrading facilities which receive raw gas from a landfill site or from an organic waste anaerobic digestion facility, clarifying that biogas is not considered a waste product in this instance. The Ministry is correct in its assertion that "these exemptions would reduce red tape for certain renewable energy [...] activities, which have benefits for communities." As such, we fully support the Proposed Amendments as written.

That said, RNG COALITION members have emphasized to us that the broader ECA process remains problematic. Given that air, noise, and water ECAs would still be required of RNG upgrading projects even after the implementation of the Proposed Amendments, we feel it is relevant to give voice to our members' more general, procedural concerns. Specifically, the RNG COALITION is of the view that, given the significant commonalities that exist between anaerobic digestion and landfill gas projects writ large, there should be some sort of streamlined treatment for permit applications in this sector. This could take many forms, including but not limited to a uniform intake process, improved and standardized definitions of Best Available Technology (BAT), consistent, standardized information requirements, and clearer definitions of contested terms such as "odour." Additionally, we urge MECP to ensure that dedicated staff are assigned to a particular ECA, which would eliminate the need for new case managers to get "up to speed" when they are brought into a particular workflow after its inception. The Ministry's overall approach to how biogas and RNG ECAs are handled requires an overhaul: this is our overarching message, and it is with these considerations in mind that we give our tacit approval to the Proposed Amendments that are open for comment at this time.

¹ Stephen, J., et al (2020). Renewable Natural Gas (Biomethane) Feedstock Potential in Canada. Study prepared by Torchlight Bioresources, Inc. for Natural Resources Canada, p. 68.