Streamlining requirements for waste disposal site service area and fill rate changes
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Ontario's proposal to remove the Environmental Screening Process for landfill service area and fill rate changes, and to exempt related Environmental Compliance Approval amendments from Environmental Registry posting and third party appeal rights, prioritizes administrative efficiency over transparency, accountability, and effective waste diversion that would reduce GHG emissions.

While presented as a means to reduce duplication and improve flexibility, the change shifts decision making away from a planning and consultation framework that considers environmental or climate impacts and alternatives, toward a narrower approvals process with reduced public oversight. This risks reinforcing disposal as the default outcome rather than ensuring it remains a last resort.

The removal of Environmental Registry postings and appeal rights limits public visibility and weakens confidence that decisions will consistently prioritize environmental protection. The absence of a formal screening process also reduces the requirement to assess alternatives such as waste reduction and diversion, particularly for organic materials. Without these safeguards, incremental approvals to expand service areas and increase fill rates may proceed without sufficient consideration of cumulative impacts. At the same time, replacing structured consultation with notification risks diminishing meaningful participation by municipalities, Indigenous communities, and the public, especially in decisions with long term environmental consequences.

These changes carry direct implications for emissions reductions, particularly methane. Landfills are one of the largest controllable sources of methane in Canada, accounting for roughly one fifth of national methane emissions. Methane has more than eighty times the warming impact of carbon dioxide over a twenty year period, making near term increases especially harmful. Organic waste, which can represent between thirty and fifty percent of landfill material, is the primary driver of these emissions. When diverted through composting or anaerobic digestion, these emissions are largely avoided. By making it easier to increase landfill intake without strengthening diversion requirements, the proposal risks increasing the volume of organic waste sent to landfill and therefore total methane generation.

Although Environmental Compliance Approvals can require landfill gas capture, these systems are not fully effective, nor in place yet. Even well managed sites typically capture between sixty and ninety percent of methane, leaving a meaningful share to escape into the atmosphere. Expanding service areas and fill rates increases the amount of waste in place and extends the duration of emissions over decades. Without a requirement to examine alternatives or assess cumulative impacts through a broader process, these incremental decisions can collectively undermine emissions reduction efforts.

Jurisdictions that prioritize organics diversion and waste reduction can achieve significant methane reductions, often on the order of thirty percent or more. In contrast, increasing landfill flexibility without enforceable diversion measures risks moving in the opposite direction. The

proposal therefore presents a short term efficiency gain at the expense of long term environmental performance and climate alignment.

Maintaining transparency, public participation, and a requirement to assess alternatives is essential to ensuring that waste policy supports emissions reduction and a transition to a circular economy. If operational flexibility is to be introduced, it should be paired with clear and enforceable diversion targets, particularly for organic waste, along with continued public oversight. Without these elements, the proposal risks entrenching landfill reliance, increasing methane emissions, and weakening Ontario's ability to meet its environmental and climate objectives.

Recommendations

Maintain Environmental Registry posting requirements for all Environmental Compliance Approval amendments related to service area and fill rate changes to ensure transparency and public accountability.

Retain third party appeal rights under the Environmental Bill of Rights so that decisions can be independently reviewed where there are environmental or community concerns.

Require a streamlined but formal alternatives assessment for any proposed increase in service area or fill rate, with clear consideration of waste reduction and diversion options, particularly for organic waste.

Establish enforceable organics diversion requirements for municipalities and waste operators as a condition of approving increased landfill capacity, with clear timelines and reporting.

Introduce a cap or phased limits on landfill expansion approvals unless demonstrated diversion targets are being met, to prevent disposal from becoming the default option.

Mandate cumulative impact assessment for repeated or incremental changes to service area and fill rate to ensure system wide environmental and emissions impacts are understood.

Strengthen Indigenous and community engagement by requiring meaningful consultation rather than notification, including early involvement and documented responses to concerns.

Require enhanced methane mitigation measures as a condition of approval, including best available landfill gas capture technology, continuous monitoring, and public reporting of capture efficiency.

Implement province wide methane reduction targets for the waste sector aligned with climate commitments, with clear accountability mechanisms.

Publicly report annually on landfill capacity, diversion rates, and methane emissions to track whether policy changes are supporting or undermining environmental and climate goals.