ONTARIO GREENHOUSE VEGETABLE GROWERS

This is Greenhouse Goodness



June 08, 2026

EA Modernization Project Team
Environmental Assessment Modernization Branch
Ministry of the Environment, Conservation and Parks
135 St. Clair Avenue West
Toronto, Ontario

Re: Streamlining Requirements for Waste Disposal Site Service Area and Fill Rate Changes (ERO 026-0414)

Dear EA Modernization Project Team,

Ontario Greenhouse Vegetable Growers (OGVG) appreciates and supports the Ministry's efforts to improve the efficiency of environmental approvals and to optimize the use of existing waste disposal capacity. OGVG supports the objective of reducing duplicative requirements; however, we have concerns regarding the potential for unintended consequences of the proposed changes on transparency and long-term regional capacity.

OGVG represents greenhouse vegetable farmers across Ontario who depend on consistent and affordable access to regional waste disposal infrastructure. This dependence becomes particularly acute during seasonal crop cleanout periods in late fall and winter, when waste volumes peak and disposal capacity is already constrained. As such, landfill access is a direct operational issue for our sector. Our members are significant generators of organic waste, and they depend on uninterrupted access to regional disposal capacity to keep producing the food that feeds Ontario families.

OGVG thanks the Ministry for working towards reducing red tape. The proposed flexibility to expand landfill service areas raises significant concerns. A service area defines the geographic boundaries from which a landfill may accept waste. Expanding these areas can have impacts that extend well beyond adjacent landowners, particularly in a context where:

a. A large share of Ontario’s remaining landfill capacity is concentrated in a small number of sites;
b. Municipalities are increasingly transporting waste across longer distances; and
c. Private landfills are operating close to their approved limits.

OGVG recognizes the short-term operational benefits of increased flexibility in landfill fill rates. Allowing sites to accept greater volumes can help meet immediate disposal needs and improve efficiencies.



However, landfill capacity is finite. Increasing fill rates accelerates the consumption of the capacity without addressing long-term supply. Ontario is projected to face capacity constraints between 2034 to 2037, absent new capacity or diversion measures.[1]

Without a parallel strategy, increased fill-rate flexibility may:

a. Shorten the lifespan of existing landfills;
b. Intensify competition for remaining capacity; and
c. Increase disposal costs for sectors that rely on these services.

For agricultural producers, who operate as price-takers, rising disposal costs create additional economic pressure and undermine sector stability.

While streamlining approvals may improve efficiency, it does not address the underlying issue of long-term disposal capacity.

Absent a coordinated provincial approach, the proposed changes risk:

a. Redistributing waste across regions without increasing overall capacity;
b. Masking the cumulative impact of incremental regulatory changes; and
c. Delaying necessary investments in new infrastructure and waste diversion.

Efficiency is valuable, but it is not a substitute for sufficiency.

To ensure the proposal achieves its intended outcomes without creating unintended consequences, OGVG respectfully recommends that the Ministry:

a. Maintain Transparency and Stakeholder Access
    i. Continue to publish approved service-area and fill-rate amendments on a publicly accessible registry;
    ii. Preserve a mechanism for notification and input from regional stakeholders and sector representatives – not only adjacent landowners.
b. Protect Regional Capacity
    i. Maintain appropriate guardrails on service-area expansion to prevent displacement of local and agricultural waste;
    ii. Require that the acceptance of out-of-area waste be supported by a clear operational rationale.
c. Incorporate Capacity Considerations into Approvals
    i. Consider the cumulative impact of fill-rate increases and service-area expansions on regional landfill capacity within Environmental Compliance Approval (ECA) reviews.
d. Align with Provincial Capacity Strategy



i. Pair regulatory streamlining with a broader strategy that includes:
   a. Development of new disposal capacity where environmentally appropriate; and
   b. Meaningful investment in waste diversion, particularly for organic materials.

OGVG supports efforts to improve regulatory efficiency and reduce unnecessary administrative burden. However, it is critical that these changes do not compromise transparency or the long-term availability of disposal capacity

Our sector depends on reliable access to regional infrastructure to continue producing food for Ontario families. We encourage the Ministry to ensure that efficiency gains are balanced with safeguards that protect regional capacity and reflect the needs of industries that rely on it.

OGVG remains available to work with the Ministry as it advances this proposal.

Thank you for your consideration.

Sincerely,

Richard Lee

Executive Director

Sources

[1] Waste to Resource Ontario, 2025 State of Waste in Ontario: Landfill Report. https://www.w2ro.org/articles/2025-w2ro-state-of-waste-in-ontario-landfill-report

About OGVG

Ontario Greenhouse Vegetable Growers (OGVG) represents 170 greenhouse vegetable farming families cultivating over 4,500 acres of tomatoes, peppers, and cucumbers across Ontario. The sector supports more than 37,000 jobs and contributes approximately $2.5 billion annually to the provincial economy.