Waste Management of Canada Corporation
Head Office
4210 King Ste East, Kitchener

June 8, 2026

The Honourable Todd J McCarthy
Ministry of Environment, Conservation and Parks
5th Floor, 777 Bay St.
Toronto, ON M7A 2J3

Submitted via Environmental Registry of Ontario

**Re: ERO Posting 026-0414 – Streamlining Requirements for Waste Disposal Site Service Area and Fill Rate Changes**

Dear Minister McCarthy,

Waste Management of Canada Corporation appreciates the opportunity to provide comments on ERO Posting 026-0414 regarding proposed changes to streamline requirements for waste disposal site service area and fill rate changes.

WM supports the Government of Ontario's objective of improving flexibility for waste disposal sites and enabling more efficient use of existing approved disposal capacity. As noted in the posting, the proposed changes are intended to support communities with waste disposal needs, reduce duplicative process requirements, and maintain environmental protection through the Environmental Compliance Approval process.

WM is supportive of the proposed direction. Removing the requirement to complete an Environmental Screening Process for service area and fill rate changes has the potential to reduce approval timelines by approximately 12 to 18 months, while still allowing the Ministry to review proposed changes through the ECA amendment process. This is a positive and practical modernization measure, particularly where a proposed change does not alter the approved footprint, total approved capacity, engineered design, or environmental controls of a waste disposal site.

Under the current process, proponents seeking a fill rate increase are required to complete the Environmental Screening Process, including multiple points of engagement and various effects assessment studies. The ESP currently requires proponents to identify and assess potential environmental effects, determine mitigation measures, and engage Indigenous communities, municipalities and interested persons. The proposed changes would remove the ESP requirement and instead require proponents to obtain an ECA amendment for service area or fill rate changes.

WM supports reducing duplication between the Environmental Assessment Act and Environmental Protection Act processes. However, the details of the proposed regulatory amendments, supporting

legislation, and any related Ministry guidance have not yet been made available. It is also not yet clear how the Ministry would administer ECA amendment applications for fill rate increases or service area changes in practice.

To avoid confusion and inconsistency between applications, WM recommends that the Ministry develop and publish a guidance document outlining expectations for what constitutes a complete ECA amendment application package for a fill rate increase or service area change. This guidance should provide clarity to proponents, municipalities, Indigenous communities, adjacent landowners, Community Liaison Committees and other interested parties.

For fill rate increases, the guidance should identify the types of supporting information the Ministry expects to receive, which may include, updated traffic assessment, haul route information, air quality, odour, noise, litter, leachate, landfill gas, stormwater, nuisance impacts, operational controls, remaining approved capacity, site life implications, monitoring requirements and proposed mitigation measures. This would ensure that relevant potential effects continue to be assessed through the ECA process while eliminating unnecessary duplication with the ESP.

For service area changes, WM supports streamlining these amendments through the ECA process. Service area flexibility is important to allow existing approved disposal capacity to be used more efficiently across Ontario, especially as municipalities and communities face limited disposal options. In many cases, a service area change does not change the approved footprint, total capacity, design, environmental controls, or operational requirements of a site. Instead, it changes the geographic area from which waste may be received, subject to the conditions of the site's ECA.

That said, service area amendments should also be supported by clear application expectations. WM recommends that Ministry guidance identify the information required to support a service area change as well.

The ERO posting states that environmental review, notification to adjacent landowners and potentially impacted Indigenous communities, and environmental protection would continue to apply through the ECA application process. It also indicates that the Ministry would notify relevant municipalities, seek municipal input, and undertake broader notification where needed. WM supports this approach but recommends that these expectations be clearly documented in guidance so that the process is transparent and consistently administered.

WM also requests that the draft regulation be made available for public review and comment before adoption. Given that the proposal would remove the ESP requirement and would also exempt certain ECA amendment applications from ERO posting and related Environmental Bill of Rights appeal rights, stakeholders should have an opportunity to review the actual regulatory language before it is finalized. This would help ensure the proposed framework is clearly understood and can be implemented effectively.

In summary, WM recommends that the Province:

- Proceed with removing the ESP requirement for service area and fill rate changes where these changes can be appropriately reviewed through the ECA amendment process;
- Publish the draft regulation for public review and comment before adoption;
- Develop Ministry guidance outlining what constitutes a complete ECA amendment application for fill rate increases and service area changes;
- Clearly define expectations for technical studies, notification, Indigenous consultation, municipal input, and Community Liaison Committee engagement where applicable; and
- Ensure the ECA process is administered consistently across applications to avoid uncertainty, delay, and inconsistent requirements between proponents.

WM appreciates the Province's efforts to modernize the approvals framework for waste disposal sites. The proposed changes are positive and have the potential to reduce unnecessary duplication, improve flexibility, and support more efficient use of existing approved disposal capacity, while maintaining strong environmental protection through the ECA process.

Sincerely,



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**About WM**

WM is North America's leading provider of comprehensive environmental solutions. Previously known as Waste Management, WM is driven by commitments to put people first and achieve success with integrity. The company, through its subsidiaries, provides collection, recycling and disposal services to millions of residential, commercial, industrial, medical and municipal customers throughout the U.S. and Canada. With innovative infrastructure and capabilities in recycling, organics and renewable energy, WM provides environmental solutions to and collaborates with its customers in helping them pursue their sustainability goals. WM has the largest disposal network and collection fleet in North America, is the largest recycler of post-consumer materials and is a leader in beneficial use of landfill gas, with a growing network of renewable natural gas plants and the most landfill gas-to-electricity plants in North America. WM also has the largest heavy-duty natural gas truck fleet in the industry in North America. WM Healthcare Solutions provides collection and disposal services of regulated medical waste, as well as secure information destruction services, in the U.S., Canada and Western Europe.

**About WM Ontario**

WM has been a long-standing partner of the Ontario government and the people of Ontario for over 50 years. We employ over 1,000 Ontarians and contribute over $500 million in annual environmental benefit to the province. WM's Ontario-based footprint includes 33 locations, comprising:3 Landfills, 15 Transfer Stations,14 Hauling Sites, 3 Recycling Plants, 1 and 1 Stericycle (Healthcare Waste) Sites. We remain committed to investing in sustainable infrastructure and delivering environmental solutions that support Ontario's climate and circular economy goals.