

February 28, 2022

Ian Drew  
Resource Recovery Policy Branch  
40 St. Clair Avenue West, 8th Floor  
Toronto, ON  
M4V 1M2

**Re: Environmental assessment requirements for advanced recycling facilities under the *Environmental Assessment Act (EAA)***

Dear Mr. Drew,

On behalf of Canadian Manufacturers & Exporters (CME) and our member companies from across Ontario, we are pleased to provide our comments on updates to the thresholds for environmental assessment requirements for thermal treatment projects engaged in advanced recycling. CME urges that these requirements exempt industrial facilities utilizing co-processing technologies and replace the term “demonstrated market demand” with “potential market demand”.

**An Exemption for Facilities Utilizing Co-Processing Technologies**

Facilities utilizing co-processing technologies are fundamentally different than standalone thermal treatment sites engaged in advanced recycling and should not be regulated under waste management regulations because:

1. Potential environmental impacts for co-processing operations at an industrial site are already addressed through existing non-waste Environmental Compliance Approvals (ECA) processes.
2. Although the amount of plastic processed using co-processing technologies at existing industrial facilities is expected to be a significant contribution to the circular plastic economy, the amount of material is such a small percentage of the facility feed that the impact on currently authorized equipment and operations is minimal.
3. As such, different requirements if any, will need to be considered for each individual co-processing operation at an industrial site covered by this proposal so as not to conflict with existing ECA requirements.

**Replace the term “demonstrated market demand” with “potential market demand”**

The proposed requirements set out that an output from the thermal treatment of waste would be a recovered material if there is a demonstrated market demand. A new recovered material may not have an immediate market demand, but new recovered material may have a demonstrated future potential market demand. This future potential should be recognized by replacing the phrase “demonstrated market demand” with “potential market demand”.



Thank you for the opportunity to comment. CME would be pleased to meet with you along with our member companies to provide our support, ideas, and insights as you review the proposal. Please do not hesitate to contact us if we can be of further assistance on this or any other issue.

Sincerely,

*Allison Bernholtz*

Allison Bernholtz, J.D.  
Manager, Environment & Industrial Policy  
Canadian Manufacturers & Exporters