

February 28, 2022

**VIA WEBFORM**

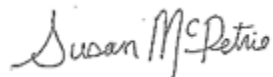
Ian Drew  
Resource Recovery Policy Branch  
40 St. Clair Ave. West  
8<sup>th</sup> Floor  
Toronto, ON  
M4V 1M2

Dear Mr. Drew:

**RE: ERO 019-4867 Environmental Assessment Requirements for Advanced Recycling Facilities under the Environmental Assessment Act (EAA)**

Niagara Region is submitting the comments below in response to ERO 019-4867. We thank you for the opportunity to share our municipal perspective and look forward to continued engagement with the province.

Regards,



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Susan McPetrie,  
Waste Management Services Advisor

Encl.

## **Niagara Region Comments on the Proposed Environmental Assessment Requirements for Advanced Recycling Facilities under the Environmental Assessment Act (EAA)**

### **Consultation Questions**

#### **1. Is the proposed approach to EA streamlining reasonable?**

Niagara Region agrees that the proposed streamlining of the Environmental Assessment process through the implementation of thresholds based on the amount of waste thermally treated (tonnes per day) by a facility is a generally reasonable approach for approximating the scale of environmental impact. However, it is recommended that the assessment process take into consideration the different processes that are captured under the umbrella of advanced recycling (e.g. pyrolysis, gasification, depolymerisation, etc.) and the varying potential environmental impacts of each process.

#### **2. Is an 80% recovery rate based on the ministry's proposed criteria realistically achievable for companies proposing this technology?**

Niagara Region has not been actively involved in the development of an alternative technology facility and would not be able to comment on feasibility from a technical standpoint. However, based on significant experience with the collection and processing of recyclable material, Niagara Region would emphasize the importance in considering how material types collected, contamination and quality requirements, as well as end market availability and prices impact the rate of recovery achieved.

#### **3. Do the proposed definitions for advanced recycling site and recovered materials accurately capture advanced recycling technologies?**

Niagara Region supports the proposed definition for advanced recycling site, as it effectively differentiates between thermal treatment technologies used for disposal and those that generate recovered material. The proposed definition of recovered materials does capture advanced recycling technologies, however it is recommended that the distinction be maintained between recovered materials that can be turned into feedstock to completely or partially replace existing inputs and recovered materials that are fuels. Niagara Region places priority on technologies that advance sustainable material recovery, maximize value creation and move Niagara and Ontario towards a circular economy.

### **Additional Comments**

Niagara Region supports the goal of increased recycling and the development of new technologies. The approach to improved environmental outcomes should also include mechanisms to discourage the use of difficult to recycle materials and support of viable end markets. The province should be engaged in market development and establishing a regulatory framework that is conducive to the establishment of advanced recycling facilities. Niagara

Region continues to prioritize waste reduction and encouraging reusable alternatives over plastic, followed by reuse, recycling and composting.