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**MEMO**

To: Hon. David Piccini, Minister of Environment, Conservation and Parks

From: Waste Connections of Canada

Date: May 2023

Re: Comments on Assessment, Permitting and Approvals Reform

As always, Waste Connections of Canada (WCC) greatly appreciates the opportunity to be consulted and give our feedback on Ministry initiatives. We know our expertise can assist the Ministry of Environment Conservation and Parks shorten assessment and permitting approval timelines for the waste sector without compromising environmental values.

**Waste Connections of Canada and its Role**

Waste Connections is the premier provider of solid waste collection, transfer, recycling and disposal services in primary and secondary markets across Ontario, Canada and the US, serving millions of customers daily. Whether it is single or multi-family residences, commercial institutions, industrial locations, construction sites or special events, Waste Connections can provide the service.

Waste Connections of Canada is a subsidiary of Waste Connections, which is traded on both the TSX and NYSE, and is the 3rd largest industrial traded company in Canada. In the US we operate in 33 of the 50 states. In Ontario, we own and operate 600 collection vehicles throughout the Province, 8 Material Recycling and Recovery Facilities and 2 landfill sites employing over 1200 people across the Province in approximately 20 locations.

**Waste Connections of Canada Core Commentary**

The following comments pertain to waste management related assessments, particularly landfill expansions and reflect WCC very recent experience. Having said this, our comments could be applied to several other private company-based submissions in other sectors.

The basis of WCC’s commentary on the cause of protracted waste sector assessment and permitting approval timelines is that the practices and interpretations of regulations has moved away from their initial intent. A “back to basics” approach by officials would drastically reduce the amount time and money exhausted by both proponents and reviewing officials.

A significant example of this drift away from the original intent and a large part of current delays is applying the Needs Analysis process to a private proposal. Put simply, a Needs Analysis, particularly how it is currently done, is not necessary for a private waste company’s proposal in Ontario. The Ministry should be assessing the environmental engineer elements of a private companies waste project. Assessing “the need” is inappropriate because it is encompassed by a private companies’ business model, which includes:

* *An Established Market/Customer Base:* The private waste management industry provides most of the waste services in Ontario and is well-established. Waste management companies, like WCC, have already identified and are meeting the needs of a growing customer base, when is decides to build or expand an operation.
* *Clear Objectives:* A private proponents proposed project will have clear objectives from a business perspective making a Needs Analysis redundant. A project, whether to collect, transport or dispose of waste will have a customer requirement associated with its origin, therefore not requiring a Ministry reviewed needs analysis.
* *Regulatory Requirements:* The waste management industry in Ontario is highly regulated in the form of permits, licenses, and regulations for waste management companies. These regulations guide a private waste companies operations, therefore a Needs Analysis adds nothing to environmental protection.
* *Technological Advancements:* Waste management technology has and continues to evolve, and companies, like WCC are continually investing in new technologies to improve their services. A proponent adopts these technologies to meet the needs of the market, customers, and current regulations, making a Needs Analysis of no use.

The Needs Analysis component should be removed as a requirement from the Environmental Assessment Act because attempting to fit a private waste sector proposal into a public type Needs Analysis is inappropriate. It does not help protect the environment and only adds unnecessary time and wasted resources to the process. The Ministry should only assess the engineering elements of a proposal as environmental protection is covered in the legislative requirements that the Proponent must satisfy.

**Additional Specific Commentary**

The amount of time an EA approval takes go through the ministerial process, should not differ whether they are from a private or municipal proponent. However, private sector approvals often take longer than their municipal counterparts for reasons related to waste diversion. This is unfair as private companies are unable, like municipalities, to legislate/by-law participation in diversion programs. Private companies service an area and are beholden to the quality of diversion of municipalities in that service area.