



CANADIAN INSTITUTE FOR
ENVIRONMENTAL LAW AND POLICY

L'INSTITUT CANADIEN DU
DROIT ET DE LA POLITIQUE
DE L'ENVIRONNEMENT

130 Spadina Avenue Suite 305
Toronto, Ontario M5V 2L4

Tel: (416)923-3529
Fax: (416)923-5949
www.cielap.org

March 7, 2007

Project Manager
Strategic Policy Branch
135 St. Clair Ave West, 11th floor
Toronto, Ontario, M4V 1P5

Via Facsimile (416) 314-2976

Dear Sir or Madam,

Re: Environmental Assessment Process Requirements for Certain Waste Management Sites, Registry #RA06E0018

I am writing on behalf of the Canadian Institute for Environmental Law and Policy (CIELAP) to provide comments on the Ministry's consultation on Waste Management Environmental Assessment (EA) requirements. CIELAP was founded in 1970, with the mission to provide leadership in the research and development of environmental law and policy that promotes the public interest and sustainability. CIELAP has been involved in research and analysis relating to waste management for many years.

CIELAP has specific concerns and comments about the proposed regulation. But first, I wish to reiterate the need for a comprehensive waste management strategy in Ontario. The proposed amendments are designed to provide a streamlined environmental assessment process for certain activities at particular waste disposal sites. While it is necessary to facilitate the development of waste management capacity, CIELAP urges the government to address the overall problem of waste management strategically and from a provincial policy perspective.

The province of Ontario should develop and adopt a broad, comprehensive waste management policy. The introduction of incremental changes to specific elements of this policy, such as environmental assessment processes for waste facilities, without attention to the broader implications of Ontario's overall waste management approach, is short-sighted and counterproductive.

CIELAP strongly urges the Ministry of the Environment to work with stakeholders and the public to develop a comprehensive waste management policy that will ensure maximum diversion of waste throughout Ontario. In particular, any evaluation of new and emerging waste management technologies should occur within the context of the province's diversion goals and priorities.

Advancing the Environmental Agenda

In general, CIELAP supports a more standardized approach to waste management projects that would include EA requirements for waste management projects that apply equally to public and private sector proponents.

However, I must emphasize CIELAP's concerns about moving ahead with changes to the waste EA process without first developing a comprehensive waste management strategy in Ontario with the participation and input of all interested stakeholders and the general public.

Thank you for the opportunity to provide input on this proposal. Please contact me, or Maureen Carter-Whitney, CIELAP's Research Director, if you wish to discuss any of these comments further.

Yours sincerely

A handwritten signature in black ink that reads "Anne Mitchell". The signature is written in a cursive, flowing style.

Anne Mitchell
Executive Director

Cc: Hon. Laurel Broten, Minister of the Environment
Gord Miller, Environmental Commissioner of Ontario