



Environmental Assessment Requirements for Advanced Recycling Facilities Under the Environmental Assessment Act (EAA) ERO Posting # 019-4867

Overview

Oxford County is a mid-sized regional government with a population count of over 120,000 spread over urban and rural communities. The County is responsible for delivering municipal solid waste management services to eight (8) Area Municipalities which includes the delivery of curbside garbage and recycling services, as well as the receipt of municipal solid waste managed at the Oxford County Waste Management Facility (OCWMF) for either land waste disposal or recycling through waste diversion programs.

The County's diversion rate in 2021 is estimated to be 44%. This metric takes into consideration all waste material – both residential and industrial, institutional, and commercial (IC&I) – handled at either County waste management facilities or through County-operated waste management programs. As of 2021, the County's remaining landfill service life is approximately 29 to 34 years. The County estimates that approximately 25% of the waste generated by the IC&I sector is being landfilled out-of-County. This forecast is based on waste generation associated with an annual growth rate of 0.67%.

The County has also adopted a Zero Waste plan to extend the life of its current landfill site to 2100. To achieve this goal the County has identified that 90% diversion of landfill waste is necessary through utilization of advanced recycling and recovery technologies.

In support of its Zero Waste plan, the County has explored the feasibility of resource recovery and recycling technologies, including an enhanced material recovery facility that would sort incoming waste material into recovered recyclables, recovered organics, and non-divertible material for advanced thermal treatment. The County is also currently undertaking a feasibility study for organics diversion and resource recovery to meet diversion targets established in the Provincial food and organic waste policy statement. Through these undertakings the County is familiar with advanced waste recovery technologies and well positioned to provide valuable feedback on the proposed regulatory changes.

Comments

The County supports the Ministry of the Environment, Conservations, and Parks (MECP's) objective to streamline the Environmental Assessment (EA) approval process to encourage new advanced recycling facility start-ups and pilot projects. Oxford County appreciates the opportunity to provide comments and feedback on the MECP's proposed environmental assessment requirements for advanced recycling facilities and offers the following comments for consideration.

Is the proposed approach to EA streamlining reasonable?

The proposed regulatory changes will benefit municipalities with lower material tonnages by minimizing the amount of red tape as well as the regulatory burden associated with thermal treatment initiatives. The proposed changes will provide new start-ups and pilot projects with time to perfect their systems to maximize the technological benefits.

Emphasis on recovered material is also very necessary to ensure that approved advanced recycling sites achieve provincial objectives and targets.

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

The proposed regulatory changes support the *Circular Economy Act* by prioritizing the need to recycle and recover resources. Through various undertakings on advanced resource recovery technologies, the County has identified that it is possible to recover up to 90% of the material handled. Specifically, the County identified that 90% of the recoverable resources would consist of recovered recyclables for material reuse through the recycling markets, recovered organics handled through biological treatments, and non-divertible material treated through advanced thermal treatment. Outputs from the organics and non-divertible materials would be compost, soil enhancements, biosolids/fertilizers, and alternative fuels. Based on the County's research we would support a recovery rate of 80% or better.

Do the proposed definitions for advanced recycling site and recovered materials accurately capture advanced recycling technologies?

The County supports the MECP's proposed definitions for advanced recycling site and recovered materials.

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