



June 25, 2021

Serge Imbrogno
Deputy Minister
Ontario Ministry of Environment, Conservation and Parks
College Park 5th Flr,
777 Bay St, Toronto, ON M7A 2J3

RE: Request for Extension of Comment Period to July 6, 2021 for ERO #019-2785, #019-2768, and #019-2972

Dear Deputy,

We are writing on behalf of the industry associations we represent to express the concerns of the thousands of Ontario companies in our respective memberships across a number of sectors related to the environment and critical infrastructure fields. The Ministry has several policies posted for comment currently on the Environmental Registry of Ontario and we are writing to request that this comment period be extended to August 6, 2021. Further, we would also that this comment period also include direct consultation with the signatory organizations and their members to ensure that the Ministry receives the fullest possible response to these critical policies.

We do not make this request lightly and note the fact that our organizations have never before made such a joint request. We are doing so because there are significant, multi-sectoral concerns about the ambiguity, uncertainty, and risk that these guidelines introduce to the operation, expansion, and development of critical private and public environmental infrastructure within Ontario.

Our associations collectively believe that further consultation and feedback is needed to ensure that the regulated community can provide meaningful information and input to MECP on the guidelines, especially given their likely impact upon current operation and future growth of business sectors that are critical to Ontario's economic recovery. The requested extension will also provide opportunities to discuss solutions that ensure appropriate environmental precautions and protections are put forward with a due consideration of the need to continue and develop critical business infrastructure.

We appreciate in advance your consideration of our request. Please do not hesitate to contact any of the undersigned should you have any questions.

Yours truly,

A handwritten signature in black ink that reads "Alex Gill". The signature is fluid and cursive.

Alex Gill
Executive Director, ONEIA

A handwritten signature in black ink that reads "Mike Chopowick". The signature is cursive and somewhat compact.

Mike Chopowick
CEO, Ontario Waste Management Association

A handwritten signature in blue ink that reads "Bryan Hocking". The signature is cursive and has a large, sweeping loop at the end.

Bryan Hocking
CEO, Ontario Road Builders' Association

A handwritten signature in blue ink that reads "Norman Cheesman". The signature is cursive and has a large, sweeping loop at the end.

Norman Cheesman, Executive Director, Ontario Stone, Sand & Gravel Association

A handwritten signature in blue ink that reads "Michele Genier". The signature is cursive and has a large, sweeping loop at the end.

Michele Genier, Executive Director, Ontario Water Works Association

c.c. Sanjay Coelho, Environmental Policy Branch
Sean Avery, Technical Assessment and Standards Development Branch