

January 18, 2019

Submitted online at: <https://ero.ontario.ca/comment/reply/node/532/comment>

Michael Helfinger
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Toronto ON M6H 4L1
Canada

**RE: EBR Proposal 013-4293 – Bill 66, Restoring Ontario’s Competitiveness Act, 2018;
Schedule 5: Ministry of the Environment, Conservation and Parks**

Dear Mr. Helfinger:

The Ontario Forest Industries Association (OFIA) thanks you for the opportunity to comment on the EBR Proposal 013-4293 – Bill 66, Restoring Ontario’s Competitiveness Act, 2018. These comments are in respect to Schedule 5: Ministry of the Environment, Conservation and Parks.

The OFIA includes over 40 forest products facilities operating in the province of Ontario, representing all aspects of the product life cycle from forest management through to final pulp, paper and solid wood products. With a strong primary sector, Ontario’s forest sector supports advanced manufacturing and innovation in the fields of biomaterials, biofuels and biochemicals. Currently, the Ontario forest products sector represents \$15.5 billion of economic activity and provides over 170,000 direct and indirect jobs across Ontario.

Ontario’s forest products sector has a long history of pollution prevention in reducing toxic substances from their facilities including:

- Voluntary elimination of elemental chlorine bleaching to address generation of chlorinated organics, including dioxins and furans.
- Voluntary elimination of products containing nonylphenol ethoxylates (NPEs) in response to concerns around endocrine disruption.
- Ongoing tracking and monitoring of chemical additives to respond to strict customer requirements and concerns around priority substances such as mercury.

The OFIA applauds the repeal of the *Toxics Reduction Act*, 2009 and all associated regulations by December 31, 2021 for the following reasons:

- The over-prescriptive regulatory requirements do nothing more than create additional costs, regulatory burden and workload with little to no benefit for the regulated community or protection of the environment. The annual reporting requirements on average cost each facility over \$20,000.

- Since the program began in 2009, any reductions in the use, creation or release of toxic substance in the wood products and the pulp and paper milling processes have been driven by the needs of the mills and decreases in production, not the Toxics Reduction Program.
- Tracking the trace amounts of the “toxic” substances that are naturally occurring in wood is a lot of work for no benefit to the public nor environment. The reporting numbers are meaningless because the calculations are based on chemical composition factors and emission factors related to production.
- The reporting of release, disposal and transfers of the “toxic” substances are already being reported under the federal National Pollutant Release Inventory (NPRI).
- The Ontario Toxics Reduction Program is not aligned with either the Federal programs for managing toxics via CEPA or with any other regulatory framework within the Province of Ontario.

The OFIA supports the proposal to no longer require facilities with existing toxics reduction plans to review those plans. The OFIA agrees that this will remove unnecessary duplication with federal programs and voluntary environmental management systems.

The OFIA agrees with the government’s intention to restore Ontario’s competitiveness by reducing unnecessary costs and burdens to businesses in Ontario. If you have any questions, please feel free to contact the undersigned at 647-231-1867 or bmossop@ofia.com.

Sincerely,



Barbara Mossop, P.Eng. MBA
Environment and Energy Technical Advisor
Ontario Forest Industries Association

cc:

Jamie Lim, President and CEO, OFIA
OFIA Environmental Affairs Committee