Toronto Water Comments for ERO 019-1760 – Hazardous Waste Digital Reporting in Ontario

ERO Number: 019-1760
Title: Discussion paper on modernizing hazardous waste reporting in Ontario

Toronto Water has reviewed the discussion paper, Hazardous Waste Digital Reporting in Ontario, and supports the proposed improvements on the new Hazardous Waste digital reporting service. We agree that the change to using a digital format will be more efficient and can better manage related records in the future.

In response to a few discussion questions listed within the paper, Toronto Water has the following comments in italics:

Registration
- How can we ensure generators are aware of their regulatory obligations even when they have chosen to delegate registrations and reporting requirements to another individual or organization?
    - *MECP can provide technical bulletins/guidance document to clarify the regulatory obligations.*
    - *MECP can also provide a breakdown of the registration and reporting process which will be very helpful in improving awareness.*
    - *MECP can provide a specific example of registration template to demonstrate to stakeholders, what information is required during the registration process.*
        - *Toronto Water would like to see on the template, the site location information to be included on the registration form.*
- Generators must maintain records of all data, analysis, and other information used to register subject waste. Now that businesses are moving digital, should we allow supporting records to be kept electronically? Are paper copies needed?
    - *Toronto Water prefers electronic copy, however if electronic copy is not available then paper copy should be available for maximum flexibility.*
- Currently spills and emergency reporting is managed through the Spills Action Centre. How should we manage registration for emergency situations going forward?
    - *Hazard Waste generated from spill or Emergency should be registered under one account with the ability for the generator to include multiple site locations and managed that way instead of calling SAC to generate an emergency number every time a new spill or emergency occurs.*
    - *We require the Ministry to clarify, if the generator needs to re-register the same type of hazard waste every time when it is generated from different sites?*

Tracking & Reporting
- What is an appropriate amount of time to allow business to work offline before being required to sync their data, eliminating gaps in time between shipment and time reported?
    - *Align with the requirements from Ontario Regulation 347 for manifest.*
- How long do generators need access to their online registration/reporting data?

- o *Following Ontario Regulation 347 for record keeping.*
- How would you like to access electronic manifests in the reporting service if there is no longer a paper copy to file?
  - o *Both PDF and/or Excel.*
- How will we handle reporting during emergency situations?
  - o *Both offline capability and paper availability for flexibility.*
- How can we improve awareness and compliance with short-term storage and onsite waste management requirements?
  - o *MECP can provide technical bulletins/guidance documents or training to clarify the definition and application of short-term storage and onsite waste management requirements.*
- How can we improve reporting of estimates and actual shipped quantities of subject waste?
  - o *Any flexibility will be good. Including more options for reporting metrics will be useful.*
- What other system features would you like to see in the new reporting service?
  - o *If you can provide a demonstration of the new reporting service, it would be useful to clarify any other potential system feature improvements.*

Transition Planning
- What is a reasonable amount of time to transition to electronic registration/reporting?
  - o *Current time frame sounds reasonable, however it may be delayed due to COVID-19.*
- Are there any transition issues we should be aware of?
  - o *No. We expect RPRA to provide support and help transition registration information to new reporting service.*
- What supports do you need to ensure a seamless transition to a digital reporting service?
  - o *MECP can provide training sessions and demonstrations for new online registration.*
  - o *MECP can provide implementation guidance document to stakeholders.*
  - o *RPRA can provide implementation strategy of switching over from HWIN to this new digital reporting service.*
  - o *Any support is welcome.*