

September 6, 2020

Eugenia Chalambalacis

Ministry of the Environment, Conservation and Parks
135 St Clair Ave West, 1st Floor
Toronto, ON M4V 1P5

Re: ERO No. 019-1080 – Proposed Changes to Environmental Approvals for Municipal Sewage Collection Works

Public Works

10 Peel Centre Dr.
Suite A
Brampton, ON
L6T 4B9
tel: 905-791-7800

peelregion.ca

The Region of Peel (Region) appreciates the opportunity to comment on the proposed policy update to modernize Ontario's environmental approvals process for low-risk municipal sewage works by implementing the consolidated linear infrastructure permissions approach.

This letter and its attachments present comments from Region staff on the proposed framework, design criteria and Environmental Compliance Approval (ECA) templates, for the Ministry's consideration.

Having operated under the system-wide sanitary and stormwater collection ECAs for 3 years and 8 months respectively, the Region recognizes the overall benefits of this consolidated approvals approach. Minor amendments are suggested to the sanitary and stormwater ECAs to strengthen and clarify the Ministry's requirements and expectations. These suggestions are provided as annotations within the attached PDF documents.

Specifically, clarification is requested on some of the new requirements to clearly define Ministry expectations and specify how compliance is to be demonstrated. The Design Criteria was also reviewed in detail and minor clarification to the specific requirements is requested throughout (please see attached).

The Region is in a good position to adapt to the proposed framework, considering that it bears similarities to the drinking water approvals framework with many existing processes and practices readily transferable to the Region's wastewater systems. The proposed implementation timelines appear adequate to us, taking into account a portion of work being completed in advance of the Region's transition to the system-wide structure of the ECA with individual approvals now consolidated under one document. Once the proposed updates are adopted, the Region will work within the provided timelines to modify our administrative processes and implement changes necessary to meet the new requirements of the sanitary and stormwater environmental approvals.

The Region supports the policy updates proposed by the Ministry to modernize the environmental approvals, reduce regulatory burden and improve environmental protection and welcomes the proposed changes.

Sincerely,



Anthony Parente, P.Eng.
(Acting) General Manager – Water/Wastewater
Region of Peel

Region of Peel

Attachments:

Draft Design Criteria – annotated

Draft Sanitary Consolidated Linear Infrastructure ECA Template – annotated

Draft Stormwater Consolidated Linear Infrastructure ECA Template – annotated

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