

About Enbridge Inc.

Enbridge Inc. is a leading North American energy infrastructure company. We safely and reliably deliver the energy people need and want to fuel quality of life. Our core businesses include Liquids Pipelines, which transports approximately 25 percent of the crude oil produced in North America; Gas Transmission and Midstream, which transports approximately 20 percent of the natural gas consumed in the U.S.; and Utilities and Power Operations, which serves approximately 3.7 million retail customers in Ontario and Quebec, and generates approximately 1,750 MW of net renewable power in North America and Europe.

Our regulated utility Enbridge Gas Inc. (“Enbridge Gas”) is Canada’s largest natural gas storage, transmission and distribution company based in Ontario with a more than 170-year history of providing safe and reliable service to customers and heats over 75 percent of Ontario homes.

Enbridge’s Hazardous Waste Management

Enbridge has and will continue to follow all applicable regulations to manage subject waste from our operations and projects, including storing waste in approved labeled containers, maintaining and inspecting waste storage areas, and proper and timely disposal of waste. Common types of waste from our assets and operations include construction debris, hydrocarbon residuals, commercial waste and contaminated soil.

Annually Enbridge maintains 144 active hazardous waste registration numbers in Ontario while maintaining an additional 68 inactive sites. We service 376 communities, operate 132 facilities, 8000 system stations, 25,000 sales meter stations, and 3.7 million residential customers sites and maintain more than 147,600 km of linear infrastructure across Ontario. While not all sites or facilities will generate hazardous waste regularly, there is the potential for Enbridge employees to encounter hazardous materials while performing routine maintenance, emergency work, remediations, or construction activities at our facilities, station sites, projects sites, and right of ways.

The below outlines how Enbridge believes these changes will lower administrative burden, reduce the amount of work when reporting and finding efficiencies with the move from paper to online reporting.

The Move to Digital Manifesting and Reduction of Administrative Burden

Enbridge appreciates the eventual move to digital manifesting for hazardous waste management. The proposed amendments to move to digital manifesting would:

- Reduce paper consumption and administrative burden (mailing and tracking down paper manifests, correction letters, etc.) while accommodating remote locations with offline capabilities;
- Reduce risk of non-compliance (lost manifests copies) and;
- Increase “real-time” oversight for generators.

Enbridge also believes that moving to this paperless way of reporting will eventually reduce the amount of work for businesses such as Enbridge, as well as save money, as small corrections or updates will be

able to be made online faster and easier. This will also reduce the administrative burden of annual registrations for those sites that will not generate waste by only requiring registration updates when there is activity (i.e. waste shipment).

Targeted Proposal Feedback

While Enbridge is supportive of many measures included in the proposal there are some items listed below that we are requesting clarity on. These include the need for clarity on whether Hazardous Waste Information Network (HWIN) registration information will be transferred to the Resource Productivity and Recovery Authority (the Authority); asking that blanket registration numbers be maintained; requesting that the Authority consider providing companies such as Enbridge the capability to build customizable reports directly from the new reporting system; clarifying the move to paperless manifesting; and details on the actual changes to Regulation 347. Each request is detailed below.

Clarity on HWIN data transfer – Enbridge is requesting clarity on whether HWIN registration information will be transferred over to the Authority or if new registrations/reporting for each site will be required. There should not be a need to “start new” as that will cause a large administrative burden and create the potential loss of historic data needed for tracking purposes as well as confusion if all sites have new generator numbers.

Keeping blanket registration numbers – The proposal does not mention whether blanket registration numbers will be maintained. Businesses should be able to keep blanket registration numbers or a variance be set up to accommodate a "blanket registration system" for continued use by those whose operations and work activities require some flexibility. Enbridge and other natural gas utilities and railways have maintained blanket registrations numbers for many years and track each location. These numbers are used in situations where waste is shipped directly from a right of way or remote locations where there is no civic address, temporary work sites not owned or operated by Enbridge, some emergency situations, and for glycol and odourant disposal from station sites. The elimination of blanket registrations could mean the registration of an additional 80 Enbridge sites per year. These sites would either never generate waste again or may generate waste once every 10 -20 years. Without a blanket registration number, we would also not be able to register waste we are accountable for when operating on customer sites or locations that may already have an existing Generator Registration Number.

Building reports from the new reporting system – The Ministry of Environment, Conservation and Parks or the Authority should consider providing generators, carriers, and receivers the capability to build useable and customizable reports directly from the new reporting system. For example, the ability to download information into a spreadsheet or export reports for waste quantities that can be sorted by date and/or waste class. This would reduce the administrative burden of tracking and trending information in duplicate systems and provide large generators with multiple facilities the capability of better managing hazardous waste and reporting.

Points of clarification – Enbridge is seeking clarity and details around moving to paperless manifesting in order to assess the impact to internal processes, procedures, required equipment and resources as the current proposal does not specify how this will work.

In addition, Enbridge is requesting details on where the proposed changes will be reflected within Regulation 347, and the new Resource Recovery and Circular Economy Act.

Conclusion

Overall, Enbridge is supportive of this proposal and is encouraged to see the move to more government services being offered online, allowing for further efficiencies. While we are supportive of the proposal, Enbridge is requesting clarity and further consideration on specific items, as outlined above. If you have any questions or require additional information please do not hesitate to contact Nicole Gruythuyzen, Government Affairs Senior Advisor (nicole.gruythuyzen@enbridge.com).