August 6, 2021

Sean Avery

Technical Assessment and Standards Development Branch

Environmental Sciences and Standards Division

Ministry of Environment, Conservation and Parks

40 St. Clair Avenue West

7th Floor

Toronto, ON

M4V 1M2

Email: [sean.avery@ontario.ca](mailto:sean.avery@ontario.ca)

Submitted via email.

**RE: Proposed Guidelines to Address Odour Mixtures, ERO 019-2768**

Dear Sean Avery,

On behalf of the Ontario Forest Industries Association (OFIA) and the Pulp and Paper Coalition, I would like to thank you for the opportunity to comment on the proposed guidelines to address odour mixtures (ERO 019-2768).

Ontario’s Forest Industry has been actively working to reduce odours from its facilities for a very long time, and has spent millions of dollars in capital to do so. For example, Kraft mills have installed equipment to collect and incinerate low-volume high concentration sources of sulfur compounds. More recently, the industry collaborated with MECP to develop a Total Reduced Sulfur (TRS) technical standard for pulp and paper facilities, including best management practices for emission sources from these facilities. Most Ontario kraft pulp and paper facilities have already implemented these best management practices.

We thank MECP for specifying that facilities registered to the Pulp and Paper Technical Standard will screen out of the odour guidelines. The industry already spent significant efforts and money developing an approach and best management practices that considers the specifics of our industry. We want to ensure that in the future, our industry can continue to work under the Pulp and Paper Technical Standard to address odour issues to avoid duplication of efforts and confusion.

We are worried that the approach, including odour testing, could result in practical and liability implications, which will add additional expense and could impact and stress our members' relationships with their communities. We, therefore, ask that MECP considers our comments before finalizing the guidelines.

It is unclear what happens if an activity that screens in (for example, biofuel production) is introduced at a registered pulp and paper site. We think it would make sense to continue to cover the new process under the pulp and paper technical standard and modify the technical standard, if required, instead of adding all of the new requirements on top of those required by the technical standard. Forcing facilities to work under both approaches (pulp and paper technical standard and odour guideline) would add significant administrative burden and costs, preventing the projects from being implemented in Ontario. We would like MECP to provide more clarity on this issue.

We are also concerned about the suggested timeline for odour accreditation for labs, as this seems like a very aggressive timeline for the implementation of a complex procedure. A plan should be developed on what approach facilities can use if lab capacity is not adequate for the needs after the initial phase-in period.

Also, for existing facilities that are not registered to the Pulp and Paper Technical Standard, there is very little information regarding how the guideline will be used. Experience has shown that when there is a community complaint regarding odour, industry is typically targeted as the source even if other sources are probably causing or contributing to the problem, such as gas leaks or releases from construction work, agricultural landspreading, etc. Use of the guideline would impose onerous requirements on the facility, for a problem that may not be originating from the facility, or may have other contributors that would not be addressed by the guideline, since the guideline would focus efforts only on the sources of odour at the facility. The guideline should be modified to better address existing facilities, and multiple sources.

Finally, many parts of the proposed guidelines are still missing, such as the Technical Bulletins. Without the complete picture of how this process will be implemented, it is difficult to provide complete and meaningful comments. We would like to suggest to MECP to develop and publish the missing parts of the approach before finalizing the guidelines.

We look forward to continuing this conversation and would welcome further discussion with MECP on this proposal.

Sincerely,

Olivia Auriat

Policy Manager, OFIA