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Client Services and Permissions Branch
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Subject: ERO Posting 019-3544, Amendments to O. Reg. 79/15 to Further Streamline the Use of Alternative Low-Carbon Fuels

On behalf of *Geocycle Canada*, I want to express our support for the most recently proposed amendments to streamline the use of alternative low-carbon fuels (ALCFs). These changes will put Ontario's cement plants at the forefront of the fight against climate change and will help the industry move closer to its goal of being carbon neutral by 2050.

In the last twenty years the cement industry has reduced the energy required to make a tonne of cement by about 20%. A key lever to accomplish additional GHG reductions is to minimize the use of conventional fuels such as coal or petroleum coke and replace these fuels with ALCFs. Coal and petroleum coke are the primary fuels used in cement production, with the combustion of coal being a significant contributor to climate change.

In Ontario, we estimate that this will help facilitate a reduction of up to 400,000 tonnes of GHGs per year or up to 2M tonnes by 2030. This is the equivalent to taking 435,000 cars off the road or planting 33 million trees.

Transparency and public trust are paramount to our company and our industry. All low carbon or zero carbon fuels will still require government approval. Controls will remain in place for government monitoring and obligating our industry to report emissions. Requirements for public consultation are being maintained to ensure transparency and accountability for all stakeholders in local communities.

The use of alternative low carbon fuels has been used extensively in Europe for many years. In Canada, Ontario is lagging behind British Columbia who has had a streamlined and transparent approach for many years. This proposal will update Ontario's current approval process that has severely limited cement makers' ability to take full advantage of low carbon fuels to reduce emissions.

The use of ALCFs also benefits the circular economy, enabling cement plants to use material that would otherwise go to landfills and increase the climate risks associated with harmful methane emissions. Materials that are at the end-of-life stage, including biomass, non-recyclable plastics, construction and demolition waste and roofing shingles will be used to replace harmful coal in the production of cement. It's important to highlight that only ALCFs that cannot be recycled and are destined for local landfills are permitted to be used.

We want to thank the government for recognizing the potential of ALCFs for reducing GHGs and diverting materials from landfill and working with industry to develop a streamlined process that maintains transparency. This regulation is a critical step in our industry's fight against climate change.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Shiv Sharma", with a long horizontal flourish extending to the right.

Shiv Sharma
Head, Geocycle Canada