

November 24, 2023

**Re: Proposed regulatory amendments to encourage greater reuse of excess soil
Response to ERO posting – O. Reg 406/19**

In addition to the comments provided on the submitted amendment document, the following changes to **O. Reg 406/19** are recommended:


Recommendation	Solution	Impact
Allow reuse sites to reuse soil from like project areas	Eliminate volume independent tables - ex. table 2.1, 3.1.	Decreased amount of soil rendered waste that was previously a resource. Less soil taken to overburdened landfills.
Expedite site alteration approvals at the Municipal level.	Create standard processes that depoliticize soil movement and require the issuance of earthworks (site alteration) approvals within a mandated timeframe. Consider permit process similar to EASR.	Creates more opportunity to reuse soil locally. Houses to market faster.
Simplify the regulation	Eliminate complex legal jargon where possible, create flowcharts per zoning classifications, create hyperlinks to referenced documents, markups available upon request (previously provided to MECP),	Less complex regulation is easier to adhere to for non-technical land owners.
Reduce burden on reuse sites	Simplify registration process and regulation, eliminate unnecessary requirements.	Creates more opportunity to reuse soil locally. Decreased hauling distance and emissions.


Sincerely,
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