

Waste Management Activities - Environmental Permissions

OASIS Conference
January 2026



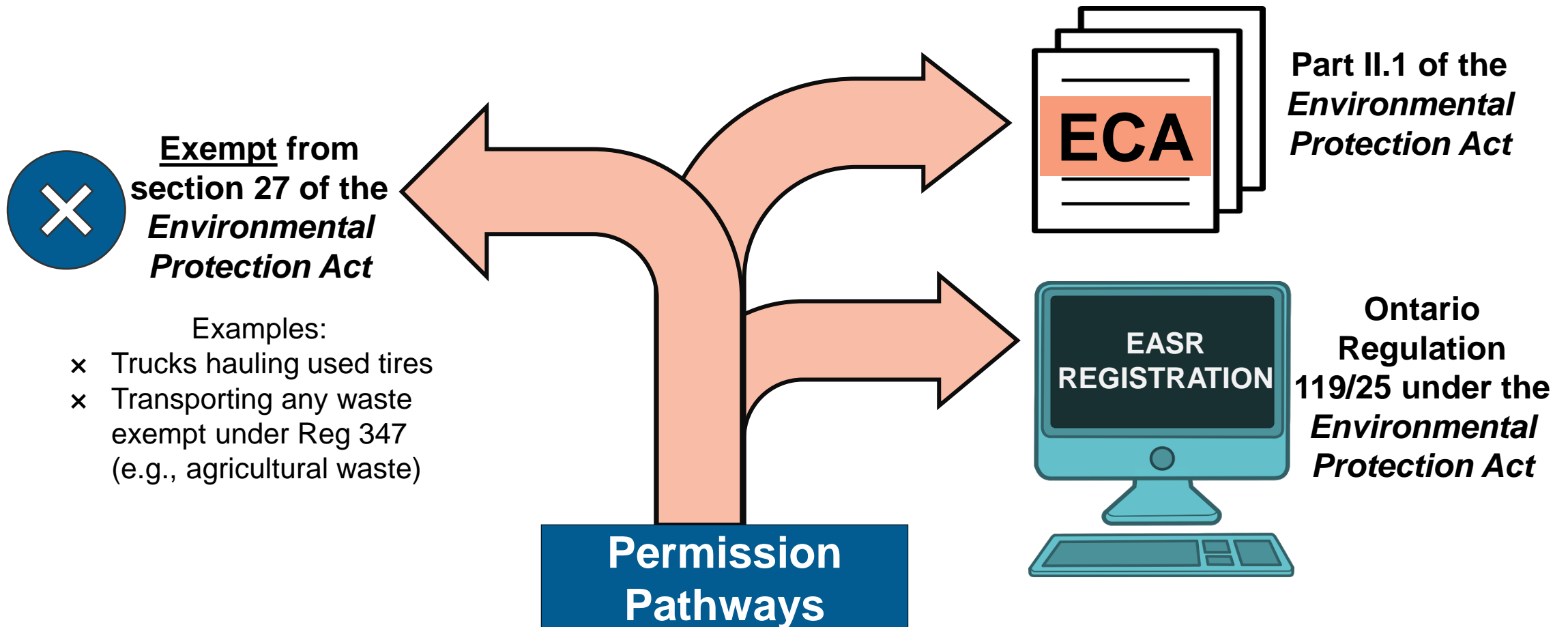
Agenda

1. Environmental permissions overview
 - Hauled sewage ECA requirements refresher
 - Waste management system EASR
2. Hauled sewage storage requirements
3. Compliance
4. Demonstration of the EASR

Environmental permissions overview

- *Hauled sewage environmental compliance approval (ECA) requirements refresher*
- *Waste management system environmental activity and sector registry (EASR) requirements*

Environmental Permissions Framework for Waste Management Activities



Overview of ECA Application Process

Before you submit an ECA application:

Pre-submission Consultation: A pre-submission consultation with the site's local District/Area Office and/or Client Services and Permissions Branch is strongly recommended for **certain** types of facilities, such as sites that do not meet standard requirements and/or when surface/groundwater monitoring requirements are expected to be in place.

When the ministry receives your ECA application:

Application Screening and Review: Application is screened for completeness to ensure all necessary supporting documentation for the review has been provided.

Comments and concerns received from the public, including those received on the Environmental Registry of Ontario (ERO) are considered during the technical review. Applicants may be asked to address these comments and concerns.



Summary of ECA Requirements	Spreading Site	Standard Dewatering Trenches	Non-Standard Dewatering Trenches	Existing Storage Lagoons	New Storage Lagoons
ECA Application Form	✓	✓	✓	✓	✓
Site Plan	✓	✓	✓	✓	✓
Soil Permeability Assessment	✓	✓	✓	✓	✓
Documents Showing Minimum Depths to Bedrock and GW	✓	✓	✓	✓	✓
Neighbour Notification	✓	✓	✓	✓	✓
Financial Assurance		May be applicable	✓	✓	✓
Application Fee					✓
Design and Operations Report		✓	✓	✓	✓
Closure Plan		✓	✓	✓	✓
Pre-submission Consultation with District Office	May be applicable	Encouraged	✓	✓	✓
ERO Posting and Municipal Notification (done by the ministry)	✓	✓	✓	✓	✓

What is the Environmental Activity and Sector Registry?



The Environmental Activity and Sector Registry (EASR) is an online, self-registration system that allows businesses conducting certain activities to register with the ministry.

Businesses engaging in prescribed activities must register with the ministry if registration criteria are met.

Businesses obtain their permission immediately after registration through the online permissions system and can begin operating with no waiting period for ministry's review.

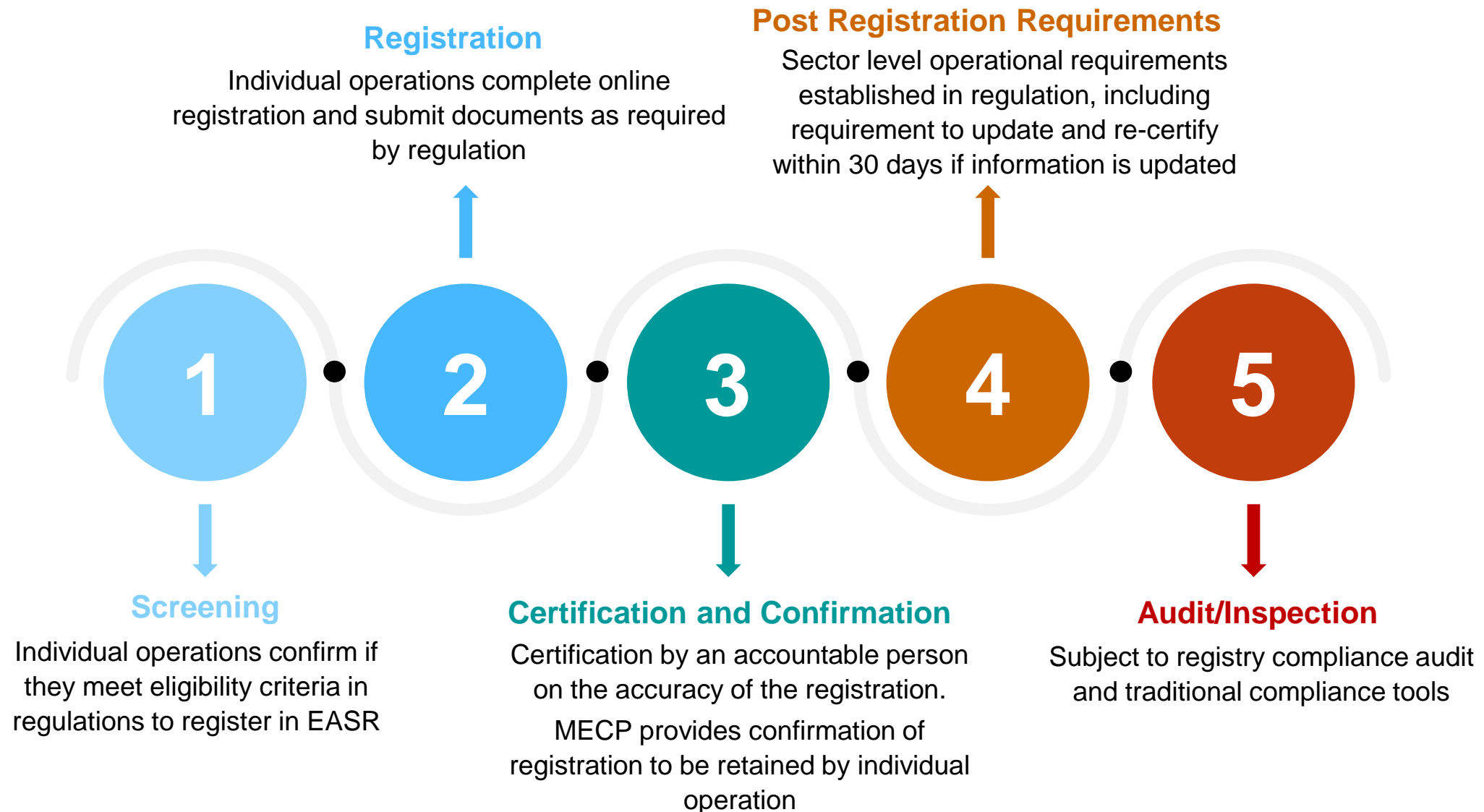
No posting on the Environmental Registry of Ontario.

Businesses who are registered need to make sure that the facility continues to meet registration requirements and ensure the registration information remains up-to-date.

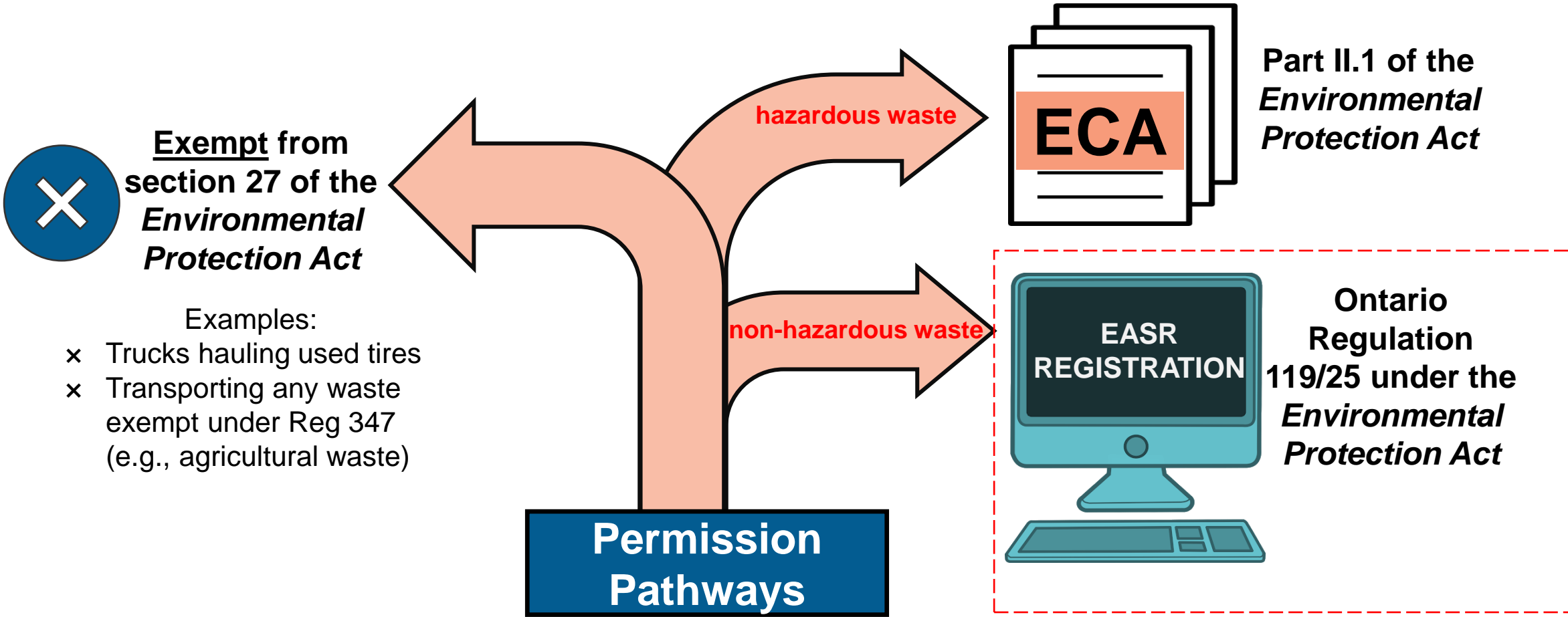
EASR registrations do not expire.

EASR registrations are specific to the registration holder and non-transferable.

EASR Registration Process Overview



Previous Framework for Waste Management Activities



WMS EASR: Regulatory Changes



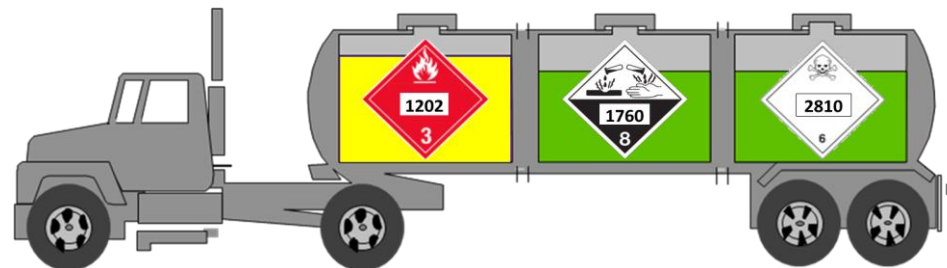
- On **August 1st, 2025**, O. Reg. 351/12 was **revoked** and replaced by a **new regulation (O. Reg. 119/25)**, which allows additional waste management **systems (transportation of waste)** to be registered in the EASR instead of applying for an ECA. In addition, **minor consequential amendments** were made to Regulation 347 to align with the new regulation.
- Waste types and activities include:
 - ✓ Asbestos Waste
 - ✓ Hazardous waste (excluding PCB, biomedical or treated biomedical, pathological, or radioactive waste)
 - ✓ Liquid Industrial Waste
 - ✓ **Hauled Sewage**
 - ✓ Temporary in-vehicle storage of waste overnight for waste that is destined out of province and until the next business day for hauled sewage.
- Registered activities must comply with updated environmentally protective requirements such as new driver training requirements and spill prevention and contingency planning.

EASR Waste Definition

A new definition was created in the **new** regulation (O. Reg. 119/25) to describe waste types that are permitted to be managed by a WMS registered in the EASR:

EASR waste is:

- × **Not** Biomedical or treated biomedical waste
- × **Not** Hazardous waste that is radioactive (for example, Naturally Occurring Radioactive Material (NORM) waste), pathological, or polychlorinated biphenyl (PCB) waste
- × **Not** any waste that is **mixed, blended, bulked** or otherwise **intermingled** with asbestos.



WMS EASR Requirements	Before August 1 st , 2025	After August 1 st , 2025
Type of waste management system	The waste management system is a waste transportation system as defined in Regulation 347.	Remains the same
Waste transportation vehicle	System must only involve waste transportation vehicles (motor vehicles) only (air, water and rail are not eligible).	Remains the same
Waste management operations	Only includes the collection, handling, transportation, and transfer of waste	Remains the same
Waste types	Only non-hazardous waste is managed by the waste management system (includes hauled sewage)	Waste types that can be managed include: <ul style="list-style-type: none"> • non-hazardous waste • asbestos waste • hazardous waste (excluding PCB, biomedical or treated biomedical, pathological, or radioactive waste) • liquid industrial waste • hauled sewage
Storage	No storage No temporary in-vehicle storage	No storage Temporary in-vehicle storage for hauled sewage under certain conditions and waste that is destined out of province

- Each type of EASR waste must be managed separately from every other type of waste
- The waste management system cannot manage a type of EASR waste, such as hazardous waste, that is mixed, blended, bulked, or otherwise intermingled with another type of waste or material

Improvements to the WMS EASR

- The **new** regulation (O. Reg. 119/25) **incorporates standardized ECA conditions and requirements** used in existing ECAs and updated regulatory requirements to reflect current ministry and industry standards and best practices for waste management systems.

The following improvements were made to strengthen the framework:

- ✓ **Additional driver training requirements:**

- ❖ All active drivers/operators must be trained at least once every 36 months (prior to the proposed changes, they only needed to be trained once).

- ✓ **Integrating spill prevention and contingency planning:**

- ❖ Provisions taken from the requirements in O. Reg. 224/07: Spill Prevention and Contingency Plans to better address any spills related to waste management systems.

- ✓ **Integrated current ministry and industry best practices:**

- ❖ Operational requirements updated to reflect current ministry and industry best practices for the transportation of waste within the province.

- ✓ **Updated IT requirements:**

- ❖ Collection of better information through self-registration to support compliance.
- ❖ Updated IT questions in the online environmental permissions system and added flags and triggers.

New Activity Requirements

The **new** regulation includes new activity requirements to require that all self-registered waste management systems activities be conducted in accordance with **industry best practices**.

The new activity requirements that must be followed include:



driver/operator training every 36 months



development of a spill prevention and contingency plan



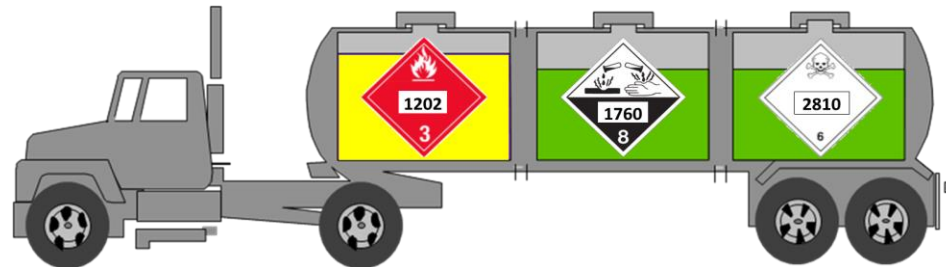
operation, maintenance, and cleaning of waste transportation vehicles



cleaning and inspection record keeping requirements

Documents to be kept in the Waste Transportation Vehicle

- Copy of the **confirmation of registration** (unless owned and operated exclusively for a municipality or the Crown)
- Proof of required **insurance**
- Proof that the driver has successfully completed the required **driver training** within the past 36 months
- Copy of the **spill prevention and contingency plans**
- If stored in vehicle overnight at a property not owned by the registrant, **written permission from the property owner** must be placed on the dashboard.



New Upload Requirements when Registering

You will need a digital copy of the following documents to upload when registering:

- A copy of your certificate of insurance (or other proof)
- A copy of your fleet list for all waste transportation vehicles and equipment to be used
 - Year
 - Make
 - Model
 - Vehicle Identification Number (VIN)
 - License plate number
 - Ownership
- A copy of the Authorization Letter, if the site used for the temporary storage of hauled sewage in the vehicle is not owned by the registrant.



The requirement to upload these documents is new, and existing EASR registrants must comply within **1 year** (by August 1, 2026)

Timeline for Updating Registration

The following timeframes need to be met to ensure the registration is up to date:

Changes / Updates	Timeframe
Collecting, handling, transporting or transferring a new waste type	Prior to managing
Addition, deletion or other changes to the vehicles, trailers or equipment in the fleet list	Within 14 days
Other information submitted when registering (e.g. proof of insurance)	Within 30 days

Transition Provisions

ONTARIO REGULATION
made under the
ENVIRONMENTAL PROTECTION ACT
REGISTRATIONS UNDER PART II.2 OF THE ACT – WASTE TRANSPORTATION
SYSTEMS

CONTENTS

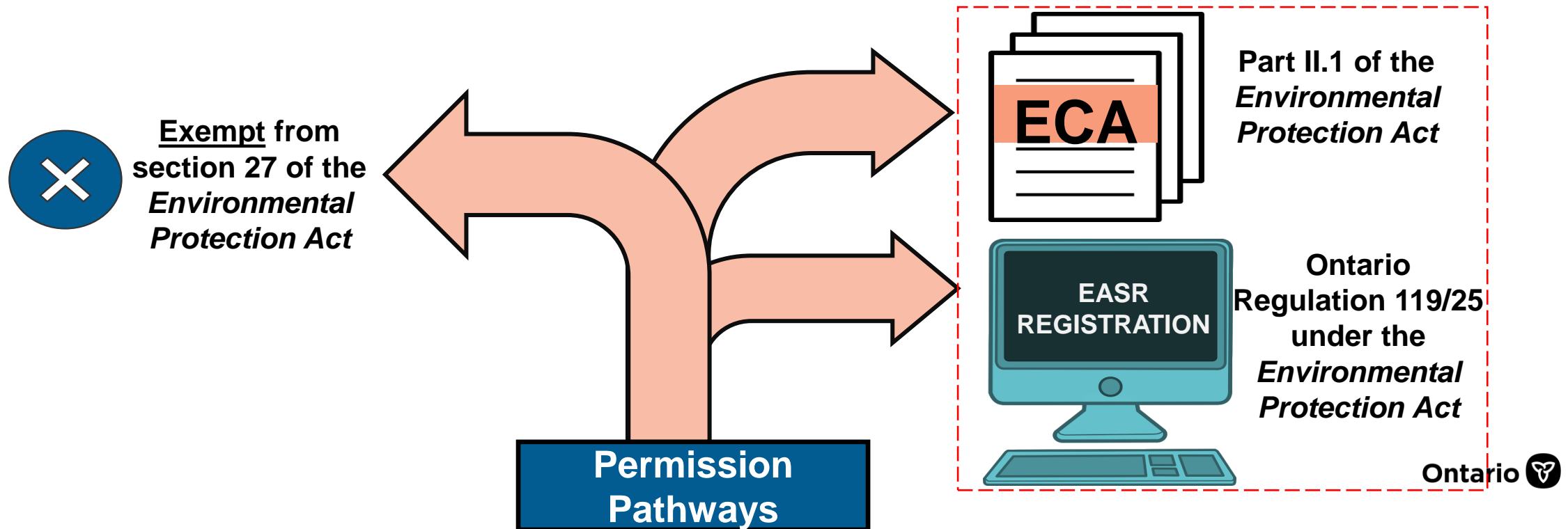
INTERPRETATION AND APPLICATION

<u>1.</u>	Interpretation
<u>2.</u>	Prescribed activities, s. 20.21 (1) and (5) of the Act
	<u>REGISTRATION MATTERS</u>
<u>3.</u>	Prescribed dates, approvals cease to have effect
<u>4.</u>	Continuation of applications for environmental compliance approval
<u>5.</u>	Registration of all activities at facility when first activity is registered
<u>6.</u>	Registration exemptions, s. 20.21 (1) (a) and (b) of the Act
<u>7.</u>	Registration requirement, information to be filed
	<u>ACTIVITY REQUIREMENTS, S. 20.21 (1) (C) OF THE ACT</u>
<u>8.</u>	EASR waste, general
<u>9.</u>	Asbestos waste
<u>10.</u>	Waste management systems, complaints
<u>11.</u>	Waste transportation vehicles
<u>12.</u>	Temporary storage in waste transportation vehicle, out of province
<u>13.</u>	Temporary storage in waste transportation vehicle, hauled sewage
	<u>DOCUMENTATION</u>
<u>14.</u>	Spill prevention plans
<u>15.</u>	Review of plans
<u>16.</u>	Records
	<u>TRANSITION</u>
<u>17.</u>	Transition, updating the Registry
	<u>REVOCATION AND COMMENCEMENT</u>
<u>18.</u>	Revocation
<u>19.</u>	Commencement

- Transition provisions were included in the **new** regulation:
 - **1 year for current EASR registrants** (to allow those already registered, one year to come into compliance with the updated requirements). (**August 1, 2026**).
 - **3 years for existing ECA holders** to transition to EASR (**August 1, 2028**)
 - Brand NEW EASR registrants (or those with amended operations) must register in the EASR as of **August 1, 2025**.

Two-permissions framework

- Under the **new** regulation, waste types and activities that are **ineligible** to self-register in EASR will continue to require an ECA, if all other criteria are met, and may require two-permission types (if they carry both EASR eligible waste and non-EASR eligible wastes).
- Waste management systems managing hauled sewage must comply with a waste disposal site (WDS) ECA along with a WMS **permission** if they will be land applying / disposing.



Hauled sewage storage requirements Refresher



Hauled Sewage Storage Requirements

ECA

- Location: 
 - May be **temporarily stored at a facility** during transportation to a receiver (*in-transit storage*)
- Duration: 
 - **No more than 14 days** under a WMS ECA

Additional requirements apply

EASR ***NEW***

- Location: 
 - Hauled sewage is **stored in** the waste transportation vehicle that collected it (*in-vehicle storage*)
 - Stored on a property that is **owned** by the registrant or a person who has given **written permission**

- Duration:
 - Only temporarily stored in-vehicle **until 8 a.m.** on the next **business day* or for **24 hours** (whichever is longer)

**"business day" means a day that is not a Saturday or a holiday within the meaning of section 87 of the Legislation Act, 2006.*

Compliance

EASR Compliance

- The ministry will implement an auditing process for verifying information submitted in the registry.
- Issues identified in registrations may result in follow-up from the ministry to correct/complete required information or gather additional details.
- In addition, the ministry will continue to enforce compliance through risk-prioritized inspections, incidents, complaints and spills.
- Non-compliance will be addressed in accordance with Ontario's Environmental [Compliance Policy](#).
 - Compliance and enforcement tools range from education & outreach to requests for investigation and potential prosecution.
- In extreme cases, a Director can suspend or remove a registration in respect of an activity that is violating the Environmental Protection Act, Ontario Water Resources Act, or the regulations made under either of those Acts (section 20.23 order under the Environmental Protection Act)

Compliance Cont.

Hauled Sewage Compliance Trends

Inspection Types

Sites

Spreading Site

Lagoon/Storage

Digester/Processing

Dewatering Trench

System/Hauling

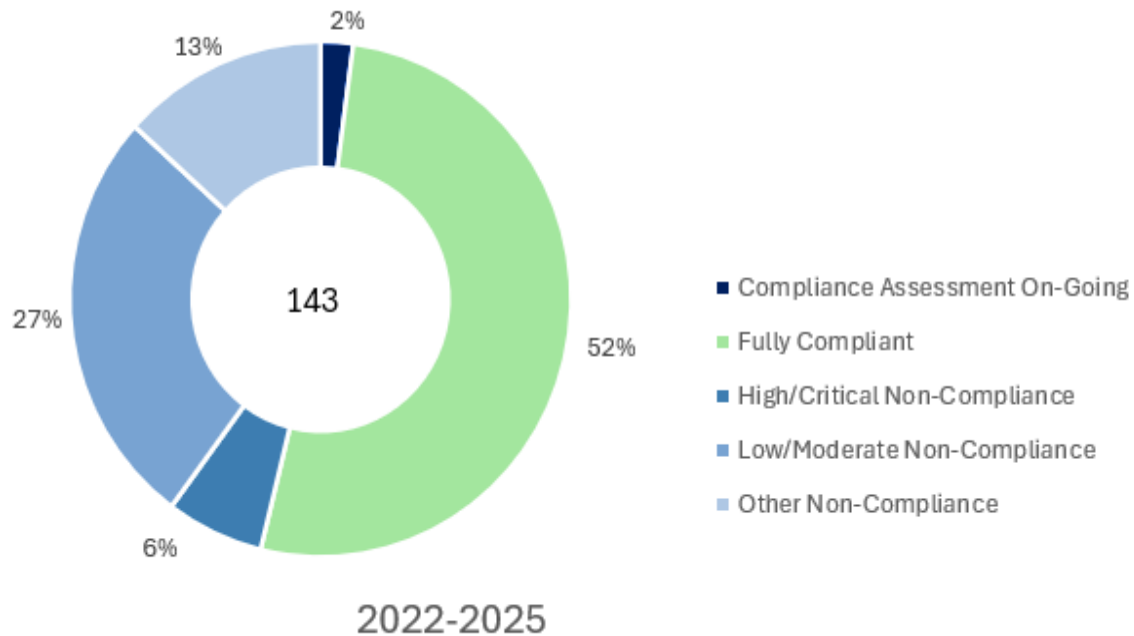
Waste Management System (WMS) ECA

WMS EASR

Absent Approval

Roadside Stop

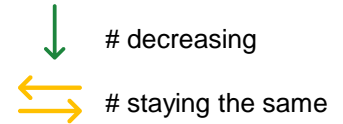
Inspection Results – 2022-2025



- 143 completed
- 74 fully compliant (52%)
- 66 inspections identified 162 non-compliances
 - 9 inspections had at least one or more high/critical non-compliance for health and environment (6%)
 - 38 low/moderate for health and environment (27%)
 - 19 had no health/environment non-compliance (13%)
- 3 compliance assessments ongoing (2%)

Non-Compliance Trends

Spreading



No written procedures developed in compliance with the requirements of the Environmental Compliance Approval (ECA) ↓ Other – Administrative



- Measures not taken to ensure compliance with the following ECA requirement. The approved spreading area (aka "useable spreading area") not clearly flagged, digitally designated in GPS, or similarly marked prior to land application so as to clearly identify setbacks from sensitive features and any areas where spreading is prohibited by the ECA ↔ High/Critical – Environmental
- Records of hauled sewage spreading activities not maintained, as specified by the ECA ↓ Other – Administrative
- Records of complaints not maintained as specified by the ECA ↔ Other – Administrative

Non-Compliance Trends Cont.

Dewatering Trenches

- Trench system not operated in a manner that complies with the Environmental Compliance Approval (ECA) requirement to clean each trench after the rest period and appropriately dispose of the wastes removed from the trench ↓
High/Critical – Environmental
- More than one dewatering trench serving as the “active receiving trench” at the site at any given time as required by the ECA ↓
Low/Moderate – Environmental
- Dewatering trenches not constructed in a manner that complies with all applicable sizing requirements set out in the ECA (i.e. length, width, depth and slope) ↓ **High/Critical** – Environmental
- **Dewatering trenches not operated in compliance with all other applicable requirements set out by the ECA** ↓
Low/Moderate – Environmental



Non-Compliance Trends Cont.

Waste Management System/Hauling

Operator/owner did not indicate that they train all drivers in accordance with all legislative requirements set out in Regulation 347 ↓ High/Critical – Human Health, Environmental

Drivers not trained in emergency management procedures for the wastes to be handled as required by Regulation 347 ↔ High/Critical – Environmental

Records not maintained in compliance with the applicable terms and conditions of the Environmental Compliance Approval ↓ Other – Administrative

Demonstration of the EASR

Additional Resources



The EASR regulation is on the e-laws website at www.e-laws.gov.on.ca



Guidance is also available on the ministry's website:

[Environmental Permissions for Waste Transportation Systems](#)

[Waste transportation system guidance for Environmental Activity and Sector Registry](#)



If you have further questions, contact the **Client Services and Permissions Branch**:

Phone: 416-314-8001 (Toll-free: 1-800-461-6290), Mon to Fri, 8:30 a.m. to 5:00 p.m.

E-mail:

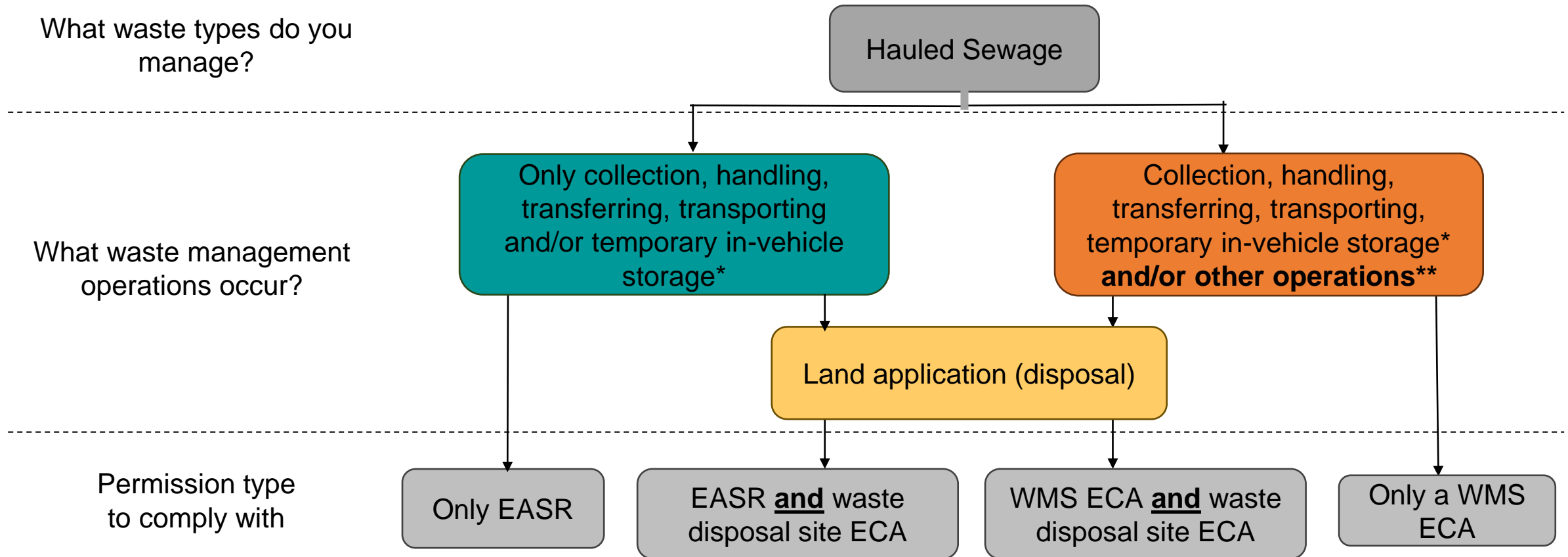
enviopermissions@ontario.ca

Thank you!



Appendix

Two-permission framework for hauled sewage



* Temporary in-vehicle storage is different from in-transit storage and only prescribed under specific conditions for hauled sewage

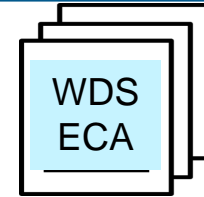
** Other operations can include in-transit storage for up to 14 days, bulking, mixing, processing and more

Example cases for hauled sewage waste management



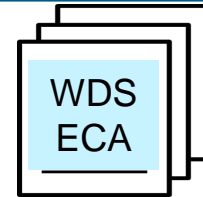
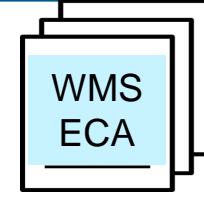
Case 1: Only requires an EASR registration

collection, handling, transferring, transporting and temporary in-vehicle storage under specific conditions prescribed in O. Reg. 119/25.



Case 2: Requires both EASR and waste disposal site ECA

collection, handling, transferring, transporting, temporary in-vehicle storage (EASR) and **land application** (WDS ECA)



Case 3: Both waste management system and waste disposal site ECAs

collection, handling, transferring, transporting, **in-transit storage up to 14-days, bulking** (WMS ECA) and **land application** (WDS ECA)

Waste transportation systems that land apply / spread must follow the conditions outlined in the waste disposal site ECA of the receiving site