

Embracing a Balanced Approach to Waste Disposal

AMO'S SUBMISSION TO THE ENVIRONMENTAL REGISTRY OF ONTARIO ON
STREAMLINING REQUIREMENTS FOR WASTE DISPOSAL SITE SERVICE AREA
AND FILL RATE CHANGES

ERO 026-0414

June 11, 2026

Proposed Classification Approach

The Association of Municipalities of Ontario (AMO) appreciates the opportunity to provide comments on the Provincial government's proposal to streamline requirements for waste disposal site service area and fill rate changes (ERO #: 026-0414). Municipal governments across Ontario have a vested interest in the long-term sustainability of landfills and waste management in the province.

AMO and the municipal sector are broadly supportive of the proposed changes that would reduce duplicative processes and increase site flexibility, while still ensuring that appropriate environmental controls and oversight remain in place.

As you are likely aware, Ontario's disposal capacity is quickly diminishing. Waste to Resource Ontario's 2025 Landfill Report highlighted that if exports to US landfills are maintained, the province will run out of landfill capacity by 2037. This number decreases to 2034 if US borders close to Ontario's waste. As such, the changes proposed are timely in nature. Although they would not result in additional landfill capacity, we would support changes that allow for additional flexibility within existing waste management arrangements that could ensure Ontario's waste can be properly managed.

Municipalities understand that Ontario urgently needs increased landfill capacity to support ambitious residential and economic growth goals. Municipalities also understand that a full Environmental Assessment (EA) process – which can take as many as 10 years – is onerous and can create delays in meeting waste disposal needs.

To tackle this, in the past AMO has advocated for a balanced approach that would empower municipalities and the Province to protect the environment and community well-being while taking decisive action to expand landfill capacity in Ontario. We have recommended that the Province establish a modernized approval process for landfills that balances expediting the ability to site and construct waste management infrastructure with maintaining strong environmental and community protection. AMO is pleased to see that this proposal incorporates AMO's recommendations and establishes a more modernized approvals process around operational changes to waste disposal and fill sites, while retaining environmental reviews and municipal consultations through the Environmental Compliance Approvals (ECAs) process.

In future, as the Province works on solutions to address the landfill capacity challenge, AMO would encourage a continued balanced approach that balances expediting the ability to site and construct waste management infrastructure with maintaining strong environmental and community protection and consultation.