



Ontario
Home Builders'
Association

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Ministry of the Environment, Conservation and Parks
Divisional Compliance Branch
135 St Clair Avenue West, Floor 8
Toronto, ON
M4V 1P5

RE: Modernizing Environmental Compliance Practices (ERO Registry # 019-2972)

The Ontario Home Builders' Association (OHBA) thanks the Ministry of the Environment, Conservation and Parks for the opportunity to provide feedback on this consultation (ERO Registry # 019-2972). OHBA supports compliance with the province's environmental laws, various Ministries, and provincial agencies that all have a role in maintaining the quality of Ontario's land, air, water, and natural resources, while protecting human health.

OHBA is supportive of addressing environmental challenges in a responsible, effective, and balanced way while reducing regulatory burden for responsible businesses. This regulatory proposal will direct Ministry and agency resources to where they are needed most, addressing medium and high-risk environmental incidents and refer low-risk incidents to municipalities. This will provide both provincial Ministries and municipalities with the clarity and consistency they need to apply relevant environmental compliance measures with confidence.

With the proposal having low-risk incidents being referred to municipalities, it will be important to assess, evaluate and determine if the municipalities can effectively administrate these new requirements without impacting approval timelines. If existing municipal approval or construction timelines are extending because of this proposal, then clearly, there will need to be a review of this approach.

For the residential construction sector, this provides greater clarity to development proponents on the response and resolution processes that can occur when there are low-risk and temporary incidents, such as intermittent noise from a residential construction site. As the Ministry has noted in the proposal, these incidents are temporary in nature, low in risk/scale and do not pose any impact to human health or the environment. OHBA members are keenly aware of their environmental compliance requirements and take responsible action to ensure high standards of environmental stewardship are upheld.

OHBA further supports the Ministry's implementation of a referral tool to help triage incidents and customer service standards that would enable both businesses and individuals to have increased confidence in the incident response measures of the relevant government Ministries. OHBA supports these measures as streamlining initiatives that will reduce the red tape burden on businesses and provide enhanced accountability on environmental compliance processes.

With the announced extension to August 6 for this ERO posting, OHBA will be engaging the Ministry for more information and provide an additional submission in the future.