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The Toronto Industry Network

May 19, 2016

E-MAILED

Chair and Members of the
Licensing and Standards Committee,
10th Floor, West Tower,
City Hall,
Toronto, Ontario,
M5H 2N2.

Attention: Ms. Della Ting

Re: Item 11.2 - Noise By-law revisions - 591- 3C

Dear Chair Palacio and Committee Members:

While the Toronto Industry Network agrees with the concept contained in section 591-3C regarding the exemption of stationary sources of noise that are permitted under Section 9 of the Environmental Protection Act (EPA), we ask that the following small but important changes be made to the By-law:

1. As we pointed out in our January 22, 2016 letter to your Committee that since an Environmental Compliance Approval (ECA) is a formal document under the EPA, the reference to the ECA in the By-law should be capitalized and have a definition sourcing it back to the EPA that could read: "An ECA is a formal approval issued by the Ministry of Environment and Climate Change (MOECC) under Section 9 of the EPA".
2. Because the MOECC has recently advised it is planning to change its process to reduce the number of facilities needing an ECA and switch "low-risk" industries to the Environmental Activity and Sector Registry (EASR), it would be helpful to change the wording of 591-3C to read:

"591-3C. from a stationery source where the emission of sound is in compliance with a provincial Environmental Compliance Approval or is registered on the Ministry of Environment and Climate Change/ Environmental Activity and Sector Registry and is in compliance with the requirements of , and regulations applying to such Registry".

....2

Page 2

We believe the changes we have suggested above will improve the interpretation of the Noise By-law and avoid the need to amend Section 591 - 3C again when MOECC changes its ECA process.

I thank you for your attention.

Sincerely,

A handwritten signature in blue ink that reads "Paul Scrivener". The signature is fluid and cursive, with a large initial "P" and a long horizontal stroke at the end.

Paul Scrivener
Director of External Relations