

Appendix I

September 22, 2025

**Regulatory Registry of Ontario
Comments on the Regulatory Proposals under the
Proposed Geologic Carbon Storage Act**

To Whom It May Concern,

The City of Brampton (hereinafter referred to as ‘the City’) appreciates the opportunity to provide comments on the proposed Geologic Carbon Storage Act posted in the Regulatory Registry, posting #25-MNRF006.

While the Ministry is considering passing the proposed Act, we would like the Ministry to address or provide additional guidance on the following key concerns from a municipal planning and environmental compliance perspective:

- The injection and long-term storage of CO₂ may pose risks to subsurface soil, underground infrastructure, groundwater, potable water sources, surface leakage and surrounding ecosystems. The City requires clear guidance on how these risks will be assessed and mitigated, especially for sites located within or near high-density residential, agricultural lands or Core Natural Heritage Systems. As such, will buffer zones and risk mitigation procedures be established for developments adjacent to carbon storage sites?
- How are the impacts and potential risks on wildlife corridors, aquatic life, recharge areas, hydrogeological and ecological vulnerability being addressed?
- The introduction of carbon storage sites may conflict with existing land use designations. Will local planning authorities be consulted early to assess compatibility and potential amendments to planning policies and zoning by-laws? Will municipalities be provided with criteria to assess adjacent or overlapping development applications in proximity to carbon storage sites?
- Can large municipalities, i.e. Urban Growth Centres with existing or proposed high-density residential development plans designed to accommodate significant population, job growth and support public transit be considered for exemptions from certain provisions of the legislation?
- Given the 30-year lifecycle of storage sites and post-closure stewardship requirements, what long-term land use planning considerations should the City account for, particularly regarding site restrictions, monitoring responsibilities and integration with Official Plans and zoning by-laws?

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- If the proposed legislation is passed, what specific steps will the City be expected to take to align their planning frameworks, permitting processes, and land use policies with the new regulations? This includes clarification on how the municipalities should update Official Plans, zoning by-laws and development review procedures to accommodate new regulations under this Act.
- Can the Ministry clarify what specific technical studies, modeling and analysis are expected as part of a carbon storage application? The City would like clarity and direction on their role in the permitting process.
- Will there be consideration on public complaints received, especially those submitted through municipal channels like 311 and how they will be addressed?
- What mechanisms will be in place to ensure meaningful consultation with municipalities, Indigenous communities, local planning authorities and emergency response agencies throughout the permitting and operational phases of carbon storage projects?
- Can the Ministry clarify how subsurface pore space rights may be separated from surface ownership such as through vertical severance of lots and how municipalities should manage potential conflicts between surface land use, subsurface carbon storage activities and associated risks?
- Will municipalities be consulted on the development of supporting regulations that are required before the Act is proclaimed?

It is kindly recommended that the Ministry has more collaborative workshops or feedback sessions with municipalities/public bodies, before enactment of the legislation.

The City of Brampton would like to thank the Province for the opportunity to provide feedback and comments on the proposed Act.

Sincerely,

X

Steve Ganesh, MCIP, RPP
Commissioner
Planning, Building & Growth Management