



AEL Advocacy Action Brief

Speak Out Against Air Pollution from Hubbert's Processing and Sales Inc.

Proposal for Environmental Compliance Approval ("ECA") with Limited Operational Flexibility (Air) - ERO #: 025-0518

 **Deadline: April 25, 2025**

This document is for your information. Please don't share it publicly.

OVERVIEW

On March 11, 2025, the Ontario Ministry of the Environment, Conservation and Parks (MECP) posted a proposal for an Environmental Compliance Approval (ECA) with Limited Operational Flexibility (Air) for Hubbert's Processing & Sales Inc., a meat processing facility producing beef tallow and lard in Brampton, Ontario. If approved, this ECA could allow the facility to increase emissions with reduced government oversight, impacting local air quality, public health, and the environment.

Under Section 9 of the Environmental Protection Act, 1990 (EPA), businesses that generate emissions related to air, noise, and/or vibrations must obtain an ECA. This permit should ensure that operations do not harm the environment or human health. However, an ECA with Limited Operational Flexibility allows facilities to make certain changes—like increasing production or updating equipment—without needing further government approval or public consultation.

We Need Your Voice!

Public comments are one of the few ways Ontarians can challenge environmental harm caused by industrial agriculture and meat processing plants. The Environmental Bill of Rights (EBR) gives the public the right to participate in environmental decision-making, ensuring transparency and accountability.

The consultation period **closes at 11:59 PM on April 25, 2025**. We urge you to **submit a comment through the Environmental Registry of Ontario ([ERO #025-0518](#))** and help push for stronger environmental protections.

KEY CONCERNS & TALKING POINTS

👉 **Choose the points that resonate with you and put them in your own words for maximum impact!**

1 Lack of Transparency & Barriers to Public Participation

- The Ministry has restricted access to key documents, preventing meaningful public engagement in environmental decision-making.
- Materials are only available for in-person viewing, and requests for access were denied or delayed.
- This is particularly troubling given the animal agriculture industry is already subject to minimal environmental oversight and weak enforcement.
- Demand immediate public access to all relevant documents and an extension of the comment period.

2 Weakening Oversight with “Limited Operational Flexibility”

- The proposed approval replaces all previous air pollution permits and could allow more emissions with less government oversight.
- Ontario must ensure strict monitoring, reporting, and review of all emission sources at the facility.

3 Serious Health & Environmental Risks from Nitrogen Oxides (NOx)

- NOx emissions contribute to:
 - Respiratory diseases (asthma, bronchitis, lung irritation)
 - Smog formation, harming human health, wildlife, and ecosystems
 - Acid rain, damaging forests, waterways, and soil
- Ontario must impose strict NOx emission limits to protect public health and the environment.

4 Cumulative Impact of Factory Farms, Meat Processing, & Slaughter Facilities


- This facility is part of a larger industry contributing to air pollution hotspots in Ontario.
- Demand a regional air quality management framework to assess and limit the combined impact of multiple facilities.


5 Increased Animal Suffering from Industrial Production

- Granting the ECA could facilitate increased production at the facility—meaning more animal-derived products (i.e. organs, tissues, etc.) required to meet production demands. The more animal products required, the more animals suffer in the process. Animals used for food often endure extreme confinement, stressful transport, and inhumane slaughter practices typical of industrial meat processing.
- Ontario must not ignore the ethical and welfare consequences of approving air permits for facilities that contribute to large-scale animal suffering.


ACTIONS

There are two special actions we're asking you to take:

 Submit your comments by April 25, 2025 through the Environmental Registry of Ontario (ERO #025-0518). Use the key points above to personalize your message. Your submission can be submitted online: <https://ero.ontario.ca/notice/025-0158>. Your voice matters!

 Share this call to action with your network—the more public pressure, the stronger our case for accountability and environmental justice.

SAMPLE COMMENT/LETTER

 **Please do not copy this word-for-word!** Use it as a reference and personalize it with your own words and concerns.



👉 Read our [comments](#) for a deeper analysis of the issues.

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To whom it may concern,

I am writing to express my concerns about the proposal for an Environmental Compliance Approval (ECA) with Limited Operational Flexibility (Air) for Hubbert's Processing and Sales Inc. (ERO #025-0518). I strongly urge the Ministry to reject this proposal in its current form and to strengthen environmental protections for the following reasons:

- **Lack of Transparency:** The public has been denied access to key documents, making it difficult to evaluate the full impact of this approval. This is particularly troubling given the animal agriculture industry is already subject to minimal environmental oversight and weak enforcement.
- **Weakened Oversight:** The Limited Operational Flexibility framework could allow the facility to increase emissions without sufficient government monitoring or public consultation.
- **Health & Environmental Risks:** Increased nitrogen oxides (NOx) emissions contribute to smog, respiratory diseases, and acid rain, harming both human health and ecosystems.
- **Cumulative Impact of Polluting Facilities:** This facility is part of a broader industry with significant environmental consequences, and its approval must be considered within the larger context of regional air quality.
- **Increased Animal Suffering:** Expanding operations at this facility likely means more animals raised and killed to meet production demands. These animals often endure extreme confinement, stressful transport, and inhumane slaughter.

I urge the Ministry to immediately make all relevant materials publicly available and extend the public comment period to allow for meaningful participation.

Thank you for your attention to this critical issue.

Sincerely,

SOCIAL MEDIA TEMPLATE

[Instagram Post](#)

[Instagram Story](#)

Sample Caption:

📢 Ontario is making it harder for the public to challenge pollution from animal agriculture! The government is restricting access to key documents and weakening oversight—making it nearly impossible for communities to fight back.

Right now, Hubbert's Processing & Sales Inc., a meat processing facility in Brampton, is seeking approval that could increase air pollution with less government oversight. This facility emits harmful nitrogen oxides (NOx), which contribute to asthma, smog, and acid rain.

📅 We have until April 25, 2025, to take action! Submitting a comment on the Environmental Registry of Ontario (ERO #025-0518) is one of the only legal ways Ontarians can challenge pollution from animal ag facilities.

👉 Take Action Now:

📄 Submit your comment before April 25! Read @aeladvocacy's Action Brief at perma.cc/5XTK-BYWU for key points and a sample letter.

📢 Spread the word! Tag friends & share this post to demand accountability.

#StopHubbertsPollution