

June 19th 2024

Mayor and Members of Brampton City Council, thank you for allowing me to speak today in Support of Sierra Peel and its concerns about the proposed expansion of the Emerald incinerator in Brampton.

My name is Liz Benneian and I am the founder of the Ontario Zero Waste Coalition. OZWC was formed in 2008, after I led a successful effort in Halton Region to defeat a large-scale incinerator project.

At the time, Ontario was offering incinerators the same 8 cent per kw/hr for energy from waste as they were for green energy. This sent newly minted incinerator proponents scurrying around the Province, trying to convince local Councils to build incinerators in their areas. After defeating the Halton incinerator, I helped citizens' groups in Meaford, Port Hope, Six Nations, Thorold, Brantford and a number of other communities, defeat incinerators proposals. Then we founded OZWC.

OZWC promotes practical solutions to reducing waste, better industrial design, plastics reduction, producer responsibility legislation, organics composting, textile recycling, materials reuse and other methods that are effective alternatives to burn or bury.

For my efforts I was invited to join a stakeholder group, brought together by the Ministry of the Environment, as part of a two-year task force as the Province crafted the Waste-Free Ontario Act which led to the enabling legislation the Resource Recovery and Circular Economy Act that is slowly, I would say too slowly, changing the way waste is managed in this province, taking some of the burden off municipalities and putting the onus for managing post-consumer goods onto the shoulders of producers.

I am also a member of the executive committee of the Canadian Zero Waste Coalition, a pan-Canada collective of groups dedicated to helping Canada reach its goals to decrease waste through the adoption of Zero Waste Policies and practices.

Just on the face of it the proposal to quadruple the size of one of the current largest sources of nitrogen dioxide emissions in Brampton, in an airshed that has already been deemed as highly compromised, is ludicrous. Even with state-of-the-art emissions controls there is no way to protect the area's present and future citizens from the effects of the dioxins, furans, mercury, arsenic, and multitude of other carcinogenic and persistent emissions, from this garbage burner. I understand that the area around the incinerator has been designated for intensification. If the Emerald expansion project proceeds, you will be putting tens of thousands of more of your citizens at risk.

Incinerators are not a solution for waste. Here's a few reasons why:

- A solution to waste cannot be something that depends on the large-scale generation of waste. Incinerators are expensive to build and very costly to maintain. For that reason, they become giant maws that must be fed with the result that they discourage programs that would reduce and divert waste.

- Incinerators do not eliminate the need for landfill. The extremely toxic fly ash is usually buried in specially built hazardous waste dumps and the bottom ash usually goes to landfill — and incinerators produce a lot of ash. Emerald itself has reported that 36% of the tonnage that goes into the incinerator, comes out as ash with 2% being the highly toxic fly ash.
- It's important to note that the much lauded and very expensive “improved” emissions controls” only trap and transfer what used to be airborne emissions to fly ash that is landfilled (toxics transferred to land rather than air is not “no emissions” or even less emissions).
- It's also important to note that no one is monitoring the very fine particulate matter that escapes all emissions controls and is the most dangerous to humans because it can transfer from our lungs to our blood, carrying its toxic payloads to all areas of the body.
- Current emissions monitoring is inadequate to protect the public and environment. Only a handful of pollutants are monitored continuously at the stack in real time. Most of the pollutants, including the most toxic ones, are monitored at the stack less than 1% of the operating time during pre-arranged stack tests, and some toxic pollutants are not monitored at all. Furthermore, annual compliance stack tests are conducted under steady state operating conditions, but it is well known that much higher emissions of pollutants can occur during upset conditions such as start-ups/shut-downs. As Durham reports have shown, emissions for pollutants are many times higher than estimates based on the “snapshot” stack test results. One of the nails in the coffin of the very first incinerator I fought in Halton was that the Chief Medical Officer of Health for the Region ordered a peer review of the health impacts from the incinerator's business case. It showed the emissions would have significant adverse health impacts on residents.

In concern for the health of Brampton's current and future citizens, I ask the members of this Council to please do what you can at the Provincial level to stop this proposal. At a minimum, a higher level of environmental assessment is needed with a focus on a much more robust and thorough health impact study.

It is not fair to the citizens of this community, and indeed for this local Council, to have a project like this imposed on them with no ability to have a say. Please make your voices heard.

Thank you.

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