



May 10, 2024

Andrea Khanjin  
Minister, Environment, Conservation and Parks  
Government of Ontario

*Sent via email: [andrea.khanjin@pc.ola.org](mailto:andrea.khanjin@pc.ola.org)*

Dear Minister Khanjin:

**Re: Request to elevate proposal by Emerald Waste to Energy Inc to expand its Brampton waste incinerator to an Individual Environmental Assessment**

We are in receipt of a letter from your ministry dated April 19, 2024, that you are considering our request for an elevation of the above-noted waste incineration expansion proposal in Brampton, on the treaty territory of the Mississaugas of the Credit and the traditional territory of the Haudenosaunee and Wendat peoples, to an individual environmental assessment. That proposal seeks to redevelop the existing facility and expand capacity from the current 182,000 tonnes of waste per year to 900,000 tonnes – a more-than-fourfold increase, the equivalent of nearly one-third of Ontario's household waste.

If the Emerald proposal comes to fruition, it would be the largest facility of its kind in Canada and render Brampton a dumping ground for Ontario's waste.

As we stated in our April 1 letter, signed by 14 organizations, in response to Emerald's Environmental Screening Report, we believe the expansion requires an individual environmental assessment for the following reasons:

- The incinerator is situated in a community that is already burdened by significant air pollution, a fact reflected in Emerald's ESR. It is important to note that this densely-populated and rapidly-growing community is home to

Indigenous people and also has a high proportion of people born outside of Canada and a lower average household income than Ontario as a whole, making this community more vulnerable to the presence of polluting industries.

- The Emerald proposal is predicated on continued increase in waste generation in Ontario, a premise that does not take into account waste reduction initiatives underway or in provincial policy that we contend would be more cost-effective and environmentally sound than a massive expansion of the waste incinerator. Right now, we estimate that some 75 per cent of the material burned in the facility – plastics, paper and organics – should rather be recycled, composted or eliminated from the market altogether. This contention is based on policies at the federal, provincial and municipal levels to eliminate single-use plastics and divert 80 per cent of waste from final disposal by 2050.
- We contend that the ESR underestimates the health impacts of air pollution from the burning of 900,000 tonnes of waste on the surrounding community, and particularly from mercury and dioxins and furans. Emerald's own ESR finds that the ambient air concentration for dioxins and furans in the area is **already 83.57 per cent of the Ontario Ambient Air Quality Criteria (AAQC)**. At full proposed capacity, the incinerator would boost the ambient air concentration of dioxins and furans above the AAQC. The ESR also suggests that the incinerator is the primary source of mercury pollution, for which there is no safe level of exposure. Furthermore, the proponent has not undertaken studies on multi-pathway exposures to these toxic pollutants, including through soil, flora and fauna as well as local wild fish and agricultural products consumed by Indigenous and immigrant residents.

We submit that an individual environmental assessment is the best way to address the shortcomings of Emerald's ESR while providing the local community with additional opportunities to learn about and weigh in on the proposal. An individual environmental assessment should enable, among other things:

- An assessment of the need for the facility, testing the claims made in the proponent's ESR and consultation material about increases to waste for final disposal in Ontario;
- A systematic comparison of alternatives to the proposal, including waste reduction and landfill;

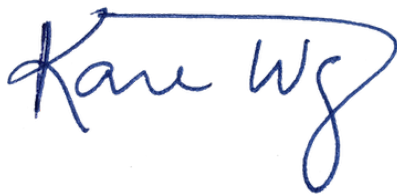
- A comprehensive assessment of the siting of the facility to determine whether the Brampton location is the right site for a mega-incinerator even if such a facility is deemed to be warranted;
- An expanded Human Health Risk Assessment that takes into account background levels of pollution, multi-pathway exposures to toxic substances such as dioxins and furans, with modelling of releases that take into account upset operating conditions.

The Emerald proposal requires more scrutiny, taking into account alternatives and environmental and health impacts of mass-burn incineration in a populated and growing area.

We are attaching here a copy of our April 1 letter in response to the Emerald ESR, a letter we sent to Emerald on January 17 with questions about the screening process, Emerald's March 18 response and, finally, the letter we received from MECP dated April 19.

We thank you for the attention you are bringing to this important issue and look forward to hearing back from you with your decision. In the meantime, please do not hesitate to contact us if you have any questions or require any further information.

Sincerely,

A handwritten signature in blue ink that reads "Karen Wirsig". The signature is written in a cursive style with a large, sweeping loop at the end of the last name.

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Cc.

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