

April 9, 2025

Dear Peel Region Chair, Mayors and Councillors:

Re: Please pass a motion opposing the expansion of the Emerald waste incinerator

As environmental and community groups active in Brampton and around Ontario, we are asking that you pass a motion to oppose the expansion of the Emerald EFW incinerator in Brampton. We have been participating in the environmental screening process and share the concerns expressed in the report from the Region's Medical Officer of Health and Commissioner of Health Services included in the agenda package for April 10, 2025.

As the health officials' report notes, pollution from an expanded incinerator will make a bad air situation for Peel residents in the vicinity of the facility even worse. What's more, as these residents are already likely to have a worse health status than other residents in Peel, provincial approval of the expansion would worsen these health disparities. Residents in the area are less likely to read and understand English, have lower incomes, are more likely to be racialized and work in non-managerial jobs than elsewhere in Peel, making them vulnerable to environmental injustice. There is also a high probability that they have not been made aware of the proposal to expand the incinerator, or the expected health impacts.

Emerald's own environmental screening reports show that there is significant air pollution in the area around the facility, at 7656 Bramalea Road near Highway 407. We believe Emerald's report underestimates background levels of harmful pollutants, including hydrochloric acid and dioxins and furans. However, even Emerald's reports indicate that levels of the carcinogen Benzo(A)Pyrene already exceed the provincial air quality criteria. At full expansion, emissions from the facility would contribute to an exceedance for nitrogen dioxides, which cause respiratory harm.

Further, the facility is already the main source of persistent and bioaccumulative pollutants, including the highly toxic dioxins and furans and heavy metals such as mercury and cadmium. These pollutants build up in soil, plants, animals and our food webs. The more waste burned at the facility, the more these toxic substances will build up and cause harm.

The Public Health report notes that Emerald estimates that most emissions will not exceed existing provincial guidelines. However, the provincial guidelines are outdated, not based on the latest science and practices in other jurisdictions. As a result, we have requested that the provincial government update its A-7 Guidelines for waste incinerators prior to granting any new permits.

An expanded incinerator would also increase carbon emissions, which runs counter to Peel's climate plan, which would accelerate climate change, creating further health impacts.

The public health report underscores that there are much better ways to manage waste that are protective of the environment and the health of local residents. As Emerald's own reports show, the majority of the garbage being incinerated at this facility includes organics, paper, plastic and materials that should be composted or recycled. Better ways to deal with these materials include collection and processing of

organic waste, improved recycling, and reuse, refill and repair programs that keep products and packaging in use instead of in the garbage bin. Instead of approving this dangerous facility, the provincial government must focus on improving waste reduction and extended producer responsibility programs.

We urge you to pass a motion to protect the health of Peel Region residents that:

- opposes the expansion of the incinerator, which would make Brampton and Peel a major destination for Ontario's waste
- opposes incineration as a dirty and greenhouse gas-intense source of energy generation;
- requests the company to commission soil and biota testing for bioaccumulative pollutants from an independent expert and share the results publicly;
- requests that information about the expansion and the health impacts be translated into the languages spoken by residents in the vicinity whose first language is not English;
- requests that the Province of Ontario review Guideline A-7 on emissions from waste incinerators; and
- requests that the Province of Ontario improve waste policy to reduce the amount of waste sent for disposal, including through expansion of sorting and treatment of organic waste, and recycling and reuse/refill systems.

We thank you for your consideration and commitment to protecting the environment and health of the people who live and work in Peel Region.

Sincerely,

Brampton Environmental Alliance
Sierra Club Peel
Dr. Mili Roy, Physician, Peel
Canadian Association of Physicians for the Environment, Ontario
Environmental Defence Canada
Toronto Environmental Alliance
ENRICH Project
Canadian Coalition for Environmental and Climate Justice
Ontario Zero Waste Coalition
Durham Environment Watch
Zero Waste 4 Zero Burning