



Dr. David McKeown  
Medical Officer of Health

Public Health  
277 Victoria Street  
5<sup>th</sup> Floor  
Toronto, Ontario M5B 1W2

Tel: 416-338-7820  
Fax: 416-392-0713  
dmckeown@toronto.ca  
www.toronto.ca/health

Reply: Sarah Gingrich  
Tel: 416-338-3513  
Fax: 416-392-7418  
sgingri@toronto.ca

December 5, 2006

Philip Knox, Chair  
Community Environmental Assessment Team  
31 Joseph Duggan Road  
Toronto, Ontario  
M4L 3X5

**Subject: Terms of Reference for Environmental Assessment of Toronto's Solid Waste Management System – Public Consultation Round One**

Dear Mr. Knox,

I am pleased to provide input to the environmental assessment terms of reference (EA TOR) for the management of Toronto's residual solid waste. An effective long-term management system for Toronto's residual solid waste is an important component of the City's overall approach to using resources sustainably and preserving environmental quality. I offer the following comments, from a health perspective, to some of the questions posed during "Round One" of the public consultation on the EA TOR. Specifically, I provide input regarding the City's waste diversion rate, and the siting of waste management facilities.

**1) "Over time, what diversion rate should Toronto achieve?" (question #1, d)**

Waste diversion is an important element of Toronto's waste management strategy. Waste reduction is also integral to residual solid waste management, and to this EA, because it would reduce the overall quantity to be managed, and likely alter the composition of the residual waste. The EA TOR should explicitly include waste prevention. This way, the EA will assess options that reduce waste and the need for residual waste management capacity, in addition to assessing technologies and facilities to manage Toronto's residual solid waste.

In the same way that energy efficiency is an inexpensive and sustainable alternative to building more power plants, waste reduction and prevention is a sustainable alternative to building new residual waste management facilities. In addition to waste diversion, the City of Toronto would benefit from looking earlier in the waste management process and preventing the creation of waste that requires diversion or disposal, as much as is achievable. This approach would reduce the cost, energy consumption and pollution resulting from waste diversion and disposal.

Waste-reduction strategies should be assessed in the EA. Waste-reduction options include:

- Mounting an educational campaign for Toronto residents, schools, retailers and other businesses to reduce the amount of garbage created;
- Identifying and exploring the feasibility of introducing mandatory, practical, waste-reduction best practices in Toronto, under the powers provided by the new City of Toronto Act. For example the EA could explore requiring retailers to charge a additional small fee for products packaged in non-reusable and non-recyclable materials, to create an appropriate incentive. This approach is already successfully used by some retailers in Toronto; and
- Transforming waste-related policies, such as actively working with the federal government to improve packaging legislation. For instance, under the federal Consumer Packaging and Labelling Regulations, only a few specific products have limits on the size of packaging. These regulations could be expanded to apply to other products, reducing the quantity of residual waste to be managed.

These few examples indicate the diversity of waste-reduction strategies available to the City of Toronto.

**I recommend:**

- **Waste reduction should be scoped into the EA for managing Toronto's residual solid waste.**
  - **The EA TOR should explicitly include waste prevention, so that the EA includes assessment of options that reduce waste and reduce the need for waste management facilities and capacity.**
- 2) **“What is the study area (i.e. where should we locate waste management facilities/system components)?” (question #2)**

The location(s) chosen for waste management facilities and system components should be those having the lowest overall health impact. When evaluating locations, potential environmental and health impacts from constructing and operating the facility should be considered, as well as impacts from transporting waste, materials and products. Impacts from transportation can vary substantially, depending on the distance between the facility and the places where waste is generated and by-products are delivered. Mode of transportation (truck, train or ship) also affects the environmental and health impacts of waste management, and it is an important consideration when evaluating potential sites.

Health Impact Assessment (HIA) is a tool that enables us to more comprehensively understand the potential impacts of a planned undertaking. HIA can address social context, existing environmental conditions, and local residents' health status where indicators are available. It can also consider potential cumulative pollutant concentrations that are likely to result from local sources plus the proposed facility. The purpose of considering these factors is to help ensure that the optimal solution

is identified, and to ensure that one group of residents is not unfairly burdened by the City's waste management decisions.

**I recommend:**

- **Health Impact Assessment should form part of the evaluation of technologies and sites in the EA for managing Toronto's residual solid waste.**
- **The evaluation of sites for waste management facilities should consider environmental and health impacts from the facility and from transportation of waste and products, existing environmental conditions, social context, health status and cumulative pollutant concentrations that are likely to result from local sources plus the proposed facility.**

Please contact me if you wish to discuss these comments further, or Toronto Public Health's role in the EA process.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. McKeown', written in a cursive style.

David McKeown, MDCM, MHSc, FRCPC  
Medical Officer of Health

cc: Richard Butts, General Manager, Solid Waste Management Services  
Michelle Carruthers, Senior Public Consultation Co-ordinator, Public Consultation