TORONTO ENVIRONMENTAL ALLIANCE

tea

A Greener City for All

To: Toronto City Councillors and members of the Infrastructure and Environment Committee

Re: IE 12.4 Mixed Waste Processing Study Update

March 11, 2020

Dear Councillors

On behalf of the Toronto Environmental Alliance (TEA) I am writing to you in response to item IE 12.4 Mixed Waste Processing Study Update to urge you to focus on waste diversion, and **reject incineration or 'thermal treatment' for any of Toronto's waste.**

Thermal treatement of waste - incineration or refuse-derived-fuel - is an expensive form of disposal that works directly against Toronto Council's environmental commitments. It is inconsistent with zero waste commitments, a circular economy, and it undermines Toronto's climate change goals.

1. Thermal treatment of waste is in direct opposition to zero waste and a circular economy.
Zero Waste is about working to eliminate waste entirely, and it requires shifting to a Circular Economy. A Circular Economy is one that ensures resources and materials are reduced, reused, repaired, recycled and recirculated, eliminating the need for raw-materials extraction, and eliminating the need for disposal in landfill or incinerator.
Toronto has committed to be a leader in the Circular Economy:

- The Long Term Waste Strategy committed to move Toronto towards a Circular Economy;
- Toronto has taken an international leadership role in hosting Circular Economy events and is a proud member of the international Circular Economy CE100 Network.
- Toronto has signed onto the C40 Cities Zero Waste Declaration that commits to reducing waste and diverting 70% of waste from landfill *and incineration* by 2030.

2. Thermal treatement of waste contributes to climate change.
Incineration is an inefficent source of *non-renewable* energy, and, in addition to toxic pollutants, can emit as many greenhouse gas emissions as burning coal.

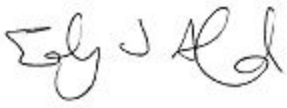
- Toronto Council declared a climate emergency and committed to net zero ghg emissions by 2050. It also committed to move to consumption-based ghg emission models. In consumption-based models, local recycling and manufacturing keeps emissions low, but disposal of resources - and the consumption of new raw materials - increases ghg emissions.
- For example, simple recycling can conserve 3 to 5 times more energy and avoided ghgs than can be gained by burning the same materials.

Focus first on reducing, reusing and recycling waste to keep it out of the garbage bag.
The Mixed Waste Processing Study results confirm that there is significant room for improvement in recycling and organics diversion in Toronto, and that the best path forward is to focus on increasing organics diversion.

- **Almost half of the 'garbage' collected in Toronto could have been recycled or composted in existing City curbside programs** - 25% was recyclable materials and approximately 30% was organics.
- Previous analysis of City audits shows that the typical 'garbage' bag contains another 10 to 15% of reusable materials or special waste that could be diverted.

We urge you to reject 'thermal treatment' disposal for Toronto's waste and follow through on Council's commitments to a Circular Economy and TransformTO climate action plan. Toronto must invest in waste diversion programs and policies that create a circular economy, reduce waste, and reduce ghg emissions.

Sincerely,



Emily J. Alfred
Waste Campaigner, Toronto Environmental Alliance

- *Please also find attached a recent fact sheet from Environmental Defence Canada on the problems with incineration and thermal treatment of plastics in particular.*

Incineration is not recycling

Burning plastic waste won't solve our pollution problems

MEDIA BACKGROUNDER
September 2018

environmental defence

The Problem with Incineration

As global attention focuses on plastic pollution and marine litter, industry groups are making an effort to appear on board. Some are, but there is a difference between what some groups actually want and what is needed to address the problem. For example, some industry groups have been championing the idea of 100 per cent plastics "recovery", but recovery is just another word for incineration, and incineration a) promotes waste generation and b) isn't part of a circular economy.

Industries and governments that are supportive of incineration state that energy can be captured by incinerating waste materials (energy-from-waste, EfW), and that incineration should be preferable to landfill. But incineration is just a tweak to the existing linear consumption model, where products are manufactured, serve a brief purpose, and are then discarded forever (in landfills or incinerators). Instead, businesses and government should be moving toward circularity, where discarded materials are used to manufacture new products.

Incineration promotes waste generation

- EfW requires expensive purpose-built power generators, creating a need for a steady supply of plastic to feed them and disincentivizing waste reduction.
- When plastics are burned, the polymers from which they were created are no longer available to make new plastic products, meaning more virgin materials are needed.
- Incineration is expensive, and displaces investments in permanent solutions directed towards reducing, reusing and recycling plastic waste.

Incineration is not consistent with a circular economy

In nature nothing is wasted. Bacteria and fungi consume dead trees, and excrete nutrients which enrich the soil and feed future trees. When animals die they are eaten by other animals, bacteria and insects. The circular economy takes this natural principle and applies it to the way we design and produce products. Instead of trying to dispose of "waste", industry and government need to see it as an essential source of valuable resources to collect and use as materials for new products.

If we burn plastics, those materials are lost, and can no longer be used to manufacture new plastic goods.