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April 27, 2021

Matthew Green, Clerk  
Infrastructure and Environment Committee  
City of Toronto  
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*Sent via email*

To whom it may concern:

**Re: IE21.5 - Authority to Negotiate and Enter into Regional Waste Management Co-operation and Contingency Agreements**

I am writing to express our opposition to the proposal to include “waste-to-energy” as a contingency option for waste disposal at the City of Toronto. Thermal treatment, or incineration, is not an environmentally sound method of disposing municipal waste.

As Canada and the world endeavour to move to adopt the principles of a circular economy, we need to wean ourselves from practices that produce non-reusable, non-recyclable and non-compostable materials destined for landfills, incinerators and the natural environment. Adopting incineration as a waste management option sends the signal that the City is comfortable with continued linear models that encourage increased generation of waste.

Some 125 kilograms of plastic packaging is introduced into the Canadian market every year for every person who lives here<sup>1</sup>. Nearly half of that is packaging designed to be used once and thrown away. These materials are not designed with recycling or reuse in mind and tend to contaminate both the recycling and composting streams and lead to additional residual waste. These plastics make up

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<sup>1</sup> Environment and Climate Change Canada, *Economic Study of the Canadian Plastics Industry, Markets and Waste (Summary)*, Report prepared by Deloitte, 2019, accessed at <http://publications.gc.ca/site/eng/9.871296/publication.html>



some 20 per cent of municipal residual waste<sup>2</sup> and, if burned, release dioxins and furans, carcinogens that end up in local and global food webs and our bodies.

Instead of simply accepting this linear waste system, we urge the city to demand action from senior levels of government to regulate products and materials to ensure they are reusable and recyclable, and to require producers -- not municipal ratepayers -- to pay the full costs of managing the materials throughout their lifecycle.

If one of the City's goals is to extend the life of the Green Lane landfill by relying less on it, the only environmentally responsible way to achieve that outcome is to reduce waste at its source.

We are attaching, for your information, a backgrounder we produced on some of the environmental traps inherent in incineration.

We wish you all the best in developing environmentally sustainable approaches to dealing with a waste problem that we recognize is not of the City's making. We just ask that you not add to the problem by pursuing waste management approaches that compound and amplify the environmental problems related to waste.

Sincerely,

Karen Wirsig  
Program Manager, Plastics

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<sup>2</sup> Kurjata, A. "How Prince George could be a hub for turning Prince George waste into fuel," CBC, March 13, 2021, accessed at <https://www.cbc.ca/news/canada/british-columbia/biofuel-waste-prince-george-sustane-canfor-1.5948553>

# Incineration is not recycling

## Burning plastic waste won't solve our pollution problems

### MEDIA BACKGROUNDER

September 2018



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### 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.

