



September 25, 2025

Infrastructure and Environment Committee
City of Toronto
Sent via email: iec@toronto.ca

Dear Toronto City Councillors:

Re: Item IE 24.7 – long-term residual waste management strategy

I am writing to express our concerns about the direction the City's long-term waste strategy appears to be headed. As Environmental Defence and four other organizations mentioned in a letter to this Committee in 2023 (attached for reference), thermal treatment of waste is not an environmentally-sound method for disposing of municipal waste.

In 2021, City Council asked for more information about the environmental and social impacts of waste incineration before considering it as an option. We have yet to see a report identifying these impacts for Council review. Without therefore even discussing or considering the impacts of incineration, you have a report before you suggesting that the public will accept this hazardous strategy. This is unacceptable.

In the meantime, Peel Public Health has published a report to Peel Council outlining concerns about the impacts of expanding the privately-owned incinerator in Brampton on the health of the local community. This should be an important reference for any decisions taken in neighbouring Toronto.

We would like to urge, once again, that Council insist that staff provide a fulsome report on the health and environmental impacts of incineration prior to proceeding any further in including thermal waste treatment in the range of options being considered for the city's long-term waste strategy.

Yours sincerely,

Karen Wirsig
Senior Program Manager, Plastics
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Zero Waste 4 Zero Burning ● **Citizens' Network on Waste Management**



environmental
defence



June 2, 2023

Ellen Devlin, Clerk
Infrastructure and Environment Committee
City of Toronto
10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

email: iec@toronto.ca

Sent via email

Dear members of the Committee:

Re: 2023-IE4.1 - Long-Term Residual Waste Management Options for the City of Toronto

We are writing to oppose the recommendation in the above noted report to explore “waste-to-energy” as a short- and long-term option for managing the City’s residual waste. Thermal treatment, or incineration, is not an environmentally sound method of disposing municipal waste.

The last time this issue came before Council, in 2021, councillors asked for more information about the environmental and social impacts of waste incineration before considering this as an option.

Now in 2023, there are still no details in the report on where such short- or longer-term agreements for incineration would be considered, nor on the expected outcomes from social, health, environmental and climate measures. What is even more worrisome is the request from staff to enter into contracts immediately to burn Toronto’s waste in existing incinerators.

Those of us who live in the communities with existing incinerators – notably Peel and Durham Regions – should not be forced to accept the burning of Toronto’s garbage in these facilities, and certainly not without full transparency and an opportunity to comment on any particular proposals.

It is totally inappropriate for City Council to deliver authority to staff to burn Toronto’s garbage in someone else’s backyard especially when elected officials cannot take into account the costs and risks of doing so from an environmental and health perspective.

Further, we urge Council not to consider burning of waste as a source of sustainable energy or waste management. The “energy-from-waste” label is greenwashing branding for a polluting process that is not a significant or efficient and cost-effective source of energy.¹

Thermal treatment of waste means burning garbage to produce heat, air emissions and ash. The ash residue, which typically amounts to 30 per cent of the mass of the waste being treated, must still be landfilled.²

Worse, burning plastics, which make up some 20 per cent³ of municipal residual waste, releases dioxins and furans, carcinogens that end up in local and global food webs and our bodies. Burning plastic also generates more greenhouse gas emissions per unit of energy than coal power generation,⁴ which would undermine the City’s commitment to achieving net zero emissions by 2040.

Some 125 kilograms of plastic alone is introduced into the Canadian market every year for every person who lives here⁵. 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 contaminate both the recycling and composting streams and lead to additional residual waste.

¹

<https://www.no-burn.org/wp-content/uploads/2021/11/Waste-Incinerators-Undermine-Clean-Energy-Goals-1.pdf>

² <https://www.generalkinematics.com/blog/what-happens-to-wte-incineration-ash/>

³ 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-can-for-1.5948553>

⁴ <https://www.no-burn.org/incineration/>

⁵ 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>

Toronto must not count on expensive infrastructure that requires a constant supply of waste over at least 30 years to amortize the cost to address its waste problems. Such investments do not fit with a waste reduction strategy.

The City must instead urgently minimize the amount of residual waste that needs to be managed by:

- Focusing on waste reduction and the commitment for Toronto to become a Circular City.
- Preventing waste through policies that support reuse, including introducing a requirement for reusable foodservice ware for dine-in at restaurants.
- Supporting expansion of reusables for takeout meals, beverages and groceries.
- Ensuring beverage containers are collected and reused or recycled, including through support for an expanded deposit-return system for all beverage containers.
- Ensuring organics are separated from residual waste and stay out of landfill, including by reinvesting in public education and awareness.

We support the City's aim to reduce residual waste that needs to be treated and we believe that approving any form of waste incineration runs counter to that strategy.

Sincerely,

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