

September 26, 2025

To: Members of the Infrastructure and Environment Committee, City of Toronto

Re: [2025.IE24.7](#) - Update on the City's Long-term Residual Waste Management Work Plan

The Toronto Environmental Alliance (TEA) and many environmental organizations have serious concerns about the environmental and health impacts of incineration. We believe that Councillors and decision makers must have the full transparent facts before any further discussion.

We have serious concerns that **the public was given false information as part of this consultation which heavily influenced public support for incineration**. Namely, the false statement that “incineration reduces the amount of greenhouse gas emissions compared to landfilling”.

We are keenly aware that both landfill and incineration are harmful and environmentally destructive options. Moments like these should rightfully push us to increase our focus on reducing waste, and invest in programs and policies like the Single-Use Reduction Strategy, or programs that keep organics out of the garbage stream. Materials that present either of these options as clean, harmless, or even environmentally beneficial are not backed up by evidence. These materials hinder Council's ability to make good decisions.

It is simply not true that incineration has less greenhouse gas emissions.

In June, TEA worked with an environmental engineer to do an analysis: we looked at the actual energy, waste and emissions data from one of North America's newest energy-from-waste facilities, and from projected emissions for the new facility planned by Emerald in Brampton. We compared that to a modern landfill that captures methane (like Green Lane) and found that incineration, by far, emits more greenhouse gas emissions than landfill.¹

We can't rely on outdated generalizations. We've found that Incineration proponents base their comments on studies and assumptions from regions with old, leaky landfills, and assume that the energy from waste will replace coal for electricity generation. This just isn't the reality in Ontario.

The City of Ottawa just completed a preliminary report and came to conclusions similar to ours: when compared to a modern landfill in Ontario, incineration releases far more greenhouse gas emissions.

¹ [Comparing the Climate Impacts of Incineration vs Landfill for Toronto's Garbage](#) TEA, June 2025

We urge this Committee and staff to disregard the public consultation results regarding incineration mentioned in the staff report, as the consultation information provided in the polling, survey and open house presentations repeated these generalizations as fact.

Notably, the consultation found that the **environmental impact was the top consideration** among 7 in 10 people. This is why presenting accurate and locally relevant information about the environment is so important, since it's clear it has a direct impact on public opinion and preference.

Health is also a public concern.

Energy from waste incineration creates extremely toxic air emissions and residual ash, even when following Ontario's pollution guidelines. A recent report from the Region of Peel's Chief Medical Officer concluded that plans to expand incineration in Brampton, following Ontario's guidelines, will have a negative health impact on residents near the incinerator.

Environment and health are also concerns of this Council.

TEA has raised these concerns in the past, when incineration was proposed as short or long term options for waste disposal in 2021 and again in 2023. Both times, Council asked staff to provide full details on the climate and health impacts of incineration options prior to moving forward. To date, transparent, local analysis of those impacts has not been publicly shared with this committee.

Local conditions matter.

We also urge you to pursue proven environmental data based on the local context before concluding which option is greener. It's been pointed out that incineration is widespread in Europe - including the famous incinerator ski-slope in Copenhagen. While it's valid to learn from other jurisdictions, the local context matters. Looking closer, European packaging and waste regulations are very different, which drastically changes what gets burned in an incinerator. Air pollution and emission standards are also much stricter in Europe.

There is growing opposition from environmental groups to incineration in Europe, and a number of countries are actually turning away from it. Denmark, once the leader in incineration, is now looking to close 1/3rd of their incinerators, in large part because the carbon-intensive energy from burning garbage is actually holding them back from meeting climate targets.²

Toronto can chart a healthier path forward by working towards a circular economy.

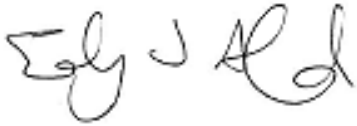
City audits show that the majority of what is in Toronto's 'garbage' isn't garbage - up to 60% of our garbage bag contents is organics and Blue Box materials that don't belong in a landfill or incinerator.

There is clearly room to grow and improve our already strong diversion programs, starting with its own operations to reduce single-use and takeaway items, get organics out of the garbage stream, especially in multi-residential buildings, and address other waste streams such as textiles and construction waste to dramatically reduce the garbage stream.

² [Copenhagen's disastrous ski slope-cum-incinerator](#), Prospect magazine, March 10 2025

Waste management is a complicated and very difficult issue - neither landfill nor incinerator is a good option. When weighing up this difficult decision, the public, Councillors and other stakeholders deserve to have the full facts and accurate local information.

Sincerely,

A handwritten signature in black ink, appearing to read "Emily J. Alfred". The signature is fluid and cursive, with the first name "Emily" being more prominent than the last name "Alfred".

Emily J. Alfred
Waste Campaigner, Toronto Environmental Alliance