

PREVENT  
CANCER  
NOW

99 Fifth Avenue, No, 138  
Ottawa, ON Canada  
K1S 5P5  
613-755-0110

info@preventcancernow.ca  
www.preventcancernow.ca

Board of Directors  
Diana Daghofer, Co-Chair  
Jake Cole, Co-Chair  
Pauline Cheslock  
Mark MacKenzie  
Sandra Madray  
Dave Renaud  
Joanna Reardon  
Meg Sears  
Dorothy Goldin Rosenberg  
Susan Tataryn

Honourary Advisors  
Sharon Batt  
Dr. Warren Bell  
Mae Burrows  
Dr. Graham Chance  
Michael Gilbertson  
Hon. Ruth Grier  
Dr. Trevor Hancock  
Henry Lickers  
Elizabeth May  
Ann Phillips  
Larry Stoffman  
Dr. David Swann, MPP

Emailed to: [cbentley.mpp.co@liberal.ola.org](mailto:cbentley.mpp.co@liberal.ola.org)

January 19, 2012

Hon. Chris Bentley  
Minister of Energy  
Province of Ontario  
4th Floor, Hearst Block, 900 Bay Street  
Toronto, ON M7A 2E1

**Re: Ontario Feed-in-Tariff Two Year Review – Consideration of Incineration for Inclusion?**

Dear Minister:

We write to express our strongest objections to any plan to include incineration, gasification or any thermal treatment of municipal solid waste, aka “Energy-from-Waste” in the Feed-In-Tariff program.

We learned only recently that on December 14 2011, the Ontario Power Authority concluded consultation on the 2-year review of the Feed In Tariff (FIT). What steps were taken to notify the public and all potentially interested stakeholders that “Energy-from-Waste” — i.e., burning garbage, which is currently explicitly excluded from FIT pricing, might be “on the table” and considered for inclusion for FIT subsidies?

Your responsibilities include:

- promoting the development of a safe, reliable, secure and environmentally sustainable energy supply for Ontario; and
- promoting energy conservation.

Recall that shutting down coal plants and reducing the pollution emitted by coal-fired power plants was one of three main reasons given for the Feed in Tariff, as stated here: <http://fit.powerauthority.on.ca/what-feed-tariff-program>. “*Help Ontario phase out coal fired electricity generation by 2014 – the largest climate change initiative in Canada.*” The objectives of boosting economic activity and creating jobs are also laudable, however, we will not be addressing that aspect in this letter except to state that subsidizing incineration will not bring Ontario closer to achieving those goals either.

Your recent comments as quoted in a Durham Region Metroland article appear to signal that you may consider burning garbage to be an acceptable source of electricity: <http://www.durhamregion.com/news/article/1267123--nuclear-power-in-durham-to-be-maintained-energy-minister-says> Dec.24.2011 Metroland Durham Region

*“There are a number of initiatives around the province involving energy from waste, and it’s a way of combining two issues — what do we do with waste, and how can we get the power and are there synergies when you combine the two,” Mr. Bentley said. “All of these sources of power make a contribution to the overall mix, and a contribution to the diversity of mix that you need in terms of power.”*

*“He said diversifying its power supply is currently the Province’s main energy focus.”*

*“We have to make sure that we have safe and reliable power,” he said.”*

-2-

Studies by consultants for both Halton and Durham Regions found **no evidence** that “modern” incinerators are safe. In 2010, then Minister of the Environment Wilkinson, prior to approving the Durham-York incinerator, refused to refer the EA to the Environment Review Tribunal where a range of concerns about incineration could have been addressed.

Ontarians expect senior ministers to be aware of the facts before musing publicly about what might be considered desirable or eligible for public subsidy, especially where an incinerator has been foisted upon a community that was an “unwilling host” before political shenanigans resulted in a single vote altering that official position.

The Ontario Power Authority website states clearly that “energy-from-waste” is NOT an eligible source of power.

See: <http://fit.powerauthority.on.ca/qa-tool-329>

**Date:** 4/21/2009

**Question:** Does energy from Energy-From-Waste facilities qualify for the FIT program, considering that these are not renewable energy sources? If so what would be the rate that they would qualify for?

**Answer:** Energy-From-Waste Facilities do not qualify for the FIT program. Energy-From-Waste is being procured under specialized procurements as per Ministerial directives.

and <http://fit.powerauthority.on.ca/renewable-technologies-0#Q8>:

*“Will energy generated from energy-from-waste facilities qualify for the FIT Program?”*

“Energy-from-waste is not considered a renewable resource and does not qualify for the FIT Program.”

A January 6, 2012 Owen Sound Times news article quotes your Ministry’s officials who explain why incineration does not qualify for FIT.

<http://www.owensoundsuntimes.com/ArticleDisplay.aspx?e=3428079>

In the United States, where state and federal governments have been similarly lobbied by the incineration industry, several organizations have produced reports that clearly demonstrate that energy produced by incinerators is much more polluting, i.e. dirtier than coal which your government plans to eliminate. For a list of toxic incinerator pollutants and their health effects, please see Appendix A of the document referenced below that also provides several charts showing emissions for key pollutants per megawatt:

Waste to Energy: Dirtying Maryland’s Air by Seeking Quick Fix on Renewable Energy – Oct. 2011  
<http://www.environmentalintegrity.org/documents/FINALWTEINCINERATORREPORT-101111.pdf>

Furthermore, per megawatt of energy, incineration produces more greenhouse gases than does coal-fired generation. Why would your government even consider allowing a more polluting and greenhouse gas intensive energy source to be considered for FIT, given FIT’s main objectives?

-3-

Two other documents we ask that you review are:

American Lung Association News Release - Nov. 15.11 Advocates Urge PSC to Reject Covanta's petition Seeking Clean Energy Funding for Dirty Garbage Incinerators <http://www.lungusa.org/associations/states/new-york/pressroom/news-releases/2010-2011/REL-advocates-urge-psc-to-reject-11-15-11.html>

Burning Public Money for Dirty Energy Nov. 2011 -Misdirected Subsidies for WTE Incinerators [http://www.no-burn.org/downloads/Burning%20Public%20Money%20GAIA%202011\\_2.pdf](http://www.no-burn.org/downloads/Burning%20Public%20Money%20GAIA%202011_2.pdf)

In March 2007 your government relaxed regulations to allow the Plasco pilot incinerator to proceed. <http://www.nowtoronto.com/news/story.cfm?content=157735&archive=26,31,2007>

Since your government relaxed Environmental Assessment (EA) requirements for incinerator demonstration/pilot projects, Ontario has been invaded by incinerator salesmen who peddle their half- baked schemes to gullible municipal councils who are often desperate to increase municipal revenues and/or to politicians who are only too willing to help large multinational incinerator vendors pick the public's pockets by signing long term contracts (Plasco-Ottawa, Durham-York Regions, Meaford).

Documents found in recent EA and Environmental Protection Act (EPA) applications show why the estimated emissions for the proposed Plasco and Durham-York incinerators should be of great concern to your government and all Ontarians. Neither technology is a source of either safe or renewable energy or a safe waste disposal option.

The Plasco demonstration incinerator exceeded emission limits 25 times over 283 days of operation over 3 years (approximately once every 11 days of operation) and failed to process permitted waste volumes or meet claimed energy production. Even with this dismal operating record, the Ministry of Environment refused Prevent Cancer Now's elevation request to require an individual EA to ensure a detailed review and MoE granted Plasco their operating permits.

For the Durham-York incinerator, the Ministry of Environment managed to accept the flawed conclusions of health risk assessment and accepted a doubling of some emissions in the EPA modeling. Furthermore the Ministry of Environment did not require compliance monitoring to be as stringent as they themselves recommend in the A-7 Guidelines, though this was requested by many stakeholders; e.g. CEMS for Particulate Matter and continuous sampling for Mercury were not required. Your government still has no standard for Particulate Matter (PM) less than 2.5 microns, though the health effects of PM < 2.5 are well documented and has not addressed the adverse health impacts of ultrafine particulate matter (nanoparticles) though this was raised repeatedly during the Durham-York EA.

In 2008, the then Minister of Energy also directed the Ontario Power Authority to enter into Power Purchase Agreements with Durham and York Regions, which will subsidize this polluting incinerator by paying an above market price of 8 cents per Kwh.

-4-

By failing to adequately address the many adverse impacts of incinerators, though granting approvals, your government has failed to protect the health of the most directly impacted communities such as Ottawa, Durham Region and other municipalities that the industry has targeted and those they may consider targeting in the future. Those lax incinerator approvals are likely to set an undesirable precedent. Lax approvals, insufficient emissions monitoring and enforcement, an industry whose vendors routinely exceed emissions standards at incinerators they own/operate in other jurisdictions (e.g. Covanta) and generous public subsidies are a recipe for disaster as concerns air quality and public health outcomes across Ontario.

Incineration is the most polluting waste disposal option in addition to being an inefficient producer of negligible amounts of dirty energy, IF the technology works. There is also the matter of dangerous incinerator process residues that can range up to one third by mass of incinerated waste. For mass-burn, fly ash is hazardous waste and bottom ash is laced with toxic residues. Durham Region didn't want the bottom ash (there is an operating landfill in Brock Township), so Covanta, the operator, will be trucking all ash residues to New York State.

Air pollution is a public health crisis that should compel your government to take all steps to move away from incineration rather than subsidize polluting, inefficient incinerators that destroy resources we should be conserving. Please review the projected figures related to illness as a result of Air Pollution.

<http://scieng.library.ubc.ca/blog/no-breathing-room-national-illness-costs-of-air-pollution/>  
and <https://www.oma.org/Resources/Documents/d2005IllnessCostsOfAirPollution.pdf>.

As well as concerns about avoidable pollution, subsidies for incineration — green-washed as “energy-from-waste” will serve to distort the market, displace truly “green and clean” forms of energy such as wind and solar, stunt local job creation and reward a dirty industry that mostly exports their profit.

Incineration of waste will expose Ontarians to a power source dirtier than the coal-fired plants you claim you wish to eliminate to protect air quality and public health. It is particularly egregious that your government is considering subsidizing incinerators while at the same time cutting grants to medical researchers. If your government were serious about protecting the health of Ontarians, sustainable materials management and “green” energy, you would consider banning incinerators altogether, as we have urged in the past and as the New Democrats did in the early 1990s, and focus on leading Ontario towards a Zero Waste future.

Your government has an opportunity to learn from other jurisdictions and to avoid mistakes which will take many years to undo. We urge you in the strongest possible terms not to consider subsidizing incinerators of any kind, in any way, and emphatically not through FIT.

Thank you for considering our comments. We formally request that we be notified should further consultations be held and when a decision is made.



Jake Cole  
Co-Chair, PCN Board  
Prevent Cancer Now  
[www.preventcancer.ca](http://www.preventcancer.ca)



Dave Renaud  
Board Member  
Prevent Cancer Now  
[www.preventcancer.ca](http://www.preventcancer.ca)

-5-

cc:

The Hon. Dalton McGuinty, Premier of Ontario  
dmcguinty.mpp.co@liberal.ola.org

The Hon. Deb Matthews, Minister of Health and Long Term Care  
dmatthews.mpp@liberal.ola.org

The Hon. Jim Bradley, Minister of the Environment  
jbradley.mpp@liberal.ola.org

The Hon. Dwight Duncan, Minister of Finance  
dduncan.mpp@liberal.ola.org

Tim Hudak, Progressive Conservative Party Leader  
tim.hudakco@pc.ola.org

Andrea Horvath, New Democratic Party Leader  
ahorvath-qp@ndp.on.ca

Mike Schreiner, Leader, Green Party of Ontario  
mikeschreiner@gpo.ca

Victor Fedeli, PC Energy Critic  
vic.fedeli@pc.ola.org

Lisa M. Thompson, PC Deputy Critic Energy (Green Energy Act)  
lisa.thompson@pc.ola.org

Peter Tabuns, NDP Energy Critic  
tabunsp-qp@ndp.on.ca

Elizabeth Witmer, PC Health Critic  
elizabeth.witmer@pc.ola.org

France Gelinias, NDP Health Critic  
fgelinias-qp@ndp.on.ca

Michael Harris, PC Environment Critic  
michael.harris@pc.ola.org

Jonah Schein, NDP Environment Critic  
jschein-qp@ndp.on.ca

Peter Shurman, PC Finance Critic  
peter.shurman@pc.ola.org

Michael Prue, NDP Finance Critic  
mprue-qp@ndp.on.ca

Monika Turner, Director of Policy, Association of Municipalities of Ontario  
MTurner@amo.on.ca