Ministry of the Environment, Conservation and Parks

Ministère de l'Environnement, de la Protection de la nature et des Parcs

Office of the Minister

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357-2025-788

RECEIVED

June 23, 2025

REGION OF PEEL
OFFICE OF THE REGIONAL CLERK

June 23, 2025

Mr. Nando lannicca Regional Chair and Chief Executive Officer Peel Region

Email: nando.iannicca@peelregion.ca

Dear Mr. lannicca:

Thank you for your letter regarding Emerald Energy from Waste Inc.'s (the proponent) proposed expansion of its energy-from-waste facility in Brampton (the project).

As you are aware, the project proceeded in accordance with the Environmental Screening Process for Waste Management Projects (ESP), pursuant to the *Environmental Assessment Act*. Following the proponent's publication of the Notice of Completion of the ESP, the Ministry of the Environment, Conservation and Parks (MECP) received elevation requests for a comprehensive environmental assessment for this project.

On April 28, 2025, I made the decision to deny the requests for elevation, subject to conditions. In making this decision, I considered the submitted requests, the proponent's responses to the concerns raised and the project documentation.

In consideration of all the relevant information, including the recommendations of the Human Health Risk Assessment for the project and the existing background air quality conditions in the study area, I have imposed conditions requiring the proponent to provide the MECP with additional information when it submits its application for subsequent Environmental Compliance Approval(s) (ECA). This additional information will include a technology benchmarking report comparing the best available technology to minimize nitrogen oxides, particulate matter, dioxins and furans emissions; as well as plans for how the proponent will identify and remove unacceptable incoming waste, manage ash, address facility upset conditions and publicly report real-time emissions and operating data.

My decision to deny the elevation requests enables the proponent to proceed with the project, subject to the imposed conditions and any other required permits or approvals, such as the necessary amendments to the ECA(s) for the facility. An ECA is a permission that allows businesses to operate their facility or site with environmental controls that protect human health and the natural environment. That ECA amendment application will be thoroughly reviewed by the MECP's technical experts before a final decision is made.

REFERRAL TO
RECOMMENDED
DIRECTION REQUIRED
RECEIPT RECOMMENDED ✓

Mr. Nando lannicca Page 2.

Thank you again for writing.

Sincerely,

Todd McCarthy

Minister of the Environment, Conservation and Parks

c: The Honourable Sylvia Jones, Deputy Premier and Minister of Health Charmaine Williams, MPP, Brampton-Centre Deepak Anand, MPP, Mississauga-Malton Iqwinder Singh Gaheer, MP, Mississauga-Malton Shafqat Ali, MP, Brampton-Chinguacousy Park



May 1, 2025

Hon. Sylvia Jones
Deputy Premier and Minister of Health
777 Bay Street, 5th Floor
Toronto, ON, M7A 2J3
sylvia.jones@ontario.ca

Hon. Todd McCarthy
Minister of Environment, Conservation and Parks
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Nando lannicca Regional Chair & CEO

10 Peel Centre Dr. Suite A, 5th Floor Brampton, ON L6T 4B9 905-791-7800ext.4310

Dear Minister Jones and Minister McCarthy:

Re: The Potential Health Impacts Related to the Proposed Emerald Energy from Waste Expansion in Peel region

On behalf of Peel Regional Council, I am writing to express concern about the anticipated increase in air pollutant emissions associated with the proposed expansion of the Emerald Energy from Waste (EEFW) incinerator, located at 7656 Bramalea Rd in Brampton, Ontario.

The EEFW facility is located in an industrial area in Brampton near Highways 407 and 410 and thermally treats non-hazardous waste. The proposal is to expand its incineration capacity up to 900,000 tonnes per year from 182,000 tonnes per year. The expansion may result in exceedances of some air pollutant limits and health benchmarks in an area where the air quality is already compromised. The EEFW has completed the Environmental Screening process required under the Environmental Assessment Act and the Region of Peel-Public Health has participated in the process and submitted comments.

On April 10, 2025, Regional Council received a report from the Commissioner of Health Services and the Medical Officer of Health on the "Potential Health Impacts Related to the Emerald Energy from Waste Proposed Expansion" (attached) and asked that the Province consider the following recommendations if this expansion moves forward:





Nando Iannicca Regional Chair & CEO

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- approval be contingent upon the installation of both best available technology
 to burn the waste and best available practices undertaken to monitor and
 control pollution in the air and soil;
- 2. an independently facilitated liaison committee with broad representation from the surrounding community be established;
- 3. monitoring data, particularly data from continuous emissions monitoring of criteria air contaminants, be made publicly available to increase transparency;
- 4. consideration be given of the long-term impact associated with the sixfold increase in greenhouse gas emissions and climate change, including the potential adverse health impacts; and
- consideration be given of the impacts of establishing robust circular economy markets that can achieve many co-benefits, including reducing greenhouse gas emissions.

Public Health Impacts

Emissions for many air pollutants are estimated to increase substantially with the expansion project. Many of them will be within the pollutant standards, however, some will exceed those standards and some of the pollutants are persistent and bio accumulative. We are concerned that this may result in an increased risk for negative health outcomes to the surrounding community, including heart and lung impacts.

Health and social demographic data indicate that, when compared to Peel as a whole, residents living in these nearby communities already have higher rates of certain health conditions, such as chronic obstructive pulmonary disease, cerebrovascular disease, ischemic heart disease and diabetes. These communities also have a higher percentage of racialized residents, more one-parent families, and a higher percentage of residents that did not complete high school and are unemployed. To decrease health inequities across Peel, we recognize the importance of reducing community exposure to any additional pollution to the best extent possible.

Lastly, greenhouse gas emissions (GHGs) are also estimated to increase six-fold due to the capacity increase. The long-term health implications associated with the expansion's net greenhouse gas increases are not quantifiable, but the health and economic impacts of climate change are currently being experienced in Peel. Further to GHG emissions sourced to the proposed expansion increasing, the business case of this type of operation is predicated on collecting enough tonnage of non-hazardous waste to generate a predictable and profitable amount of energy by incineration. This approach to waste management is counter to the promotion and sustainability of robust circular economy markets, which are crucial for minimizing waste, pollution and resource consumption, and maximizing resource efficiency that, taken together can lead to significant reductions in greenhouse gas emissions.



Nando lannicca Regional Chair & CEO

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Provincial Approval

With the conclusion of the Environmental Screening process under the *Environmental Assessment Act* and a decision on whether the expansion will go forward resting with the Ministry of Environment, Conservation and Parks (MECP), we request that the ministry consider the comments submitted by interest-holders and review the implications closely, particularly as it relates to increased air pollutant emissions to an area that is already experiencing exceedances of some health benchmarks.

Thank you for taking the time to consider our concerns regarding the EEFW proposed expansion. If you have any questions, please contact Franca Ursitti at franca.ursitti@peelregion.ca.

Kindest personal regards,

Nando Iannicca

Regional Chair and Chief Executive Officer

Peel Region

ATT: Council Report entitled 'Potential Health Impacts Related to the Emerald Energy from Waste Proposed Expansion', dated April 10, 2025

CC: Minister Charmaine Williams, MPP, Brampton-Centre Deepak Anand, MPP, Mississauga-Malton Hon. Kamal Khera, Minister of Health Iqwinder Singh Gaheer, MP, Mississauga-Malton Shafqat Ali, MP, Brampton-Chinguacousy Park

