

March 26, 2024

Dear Members of Regional Council,

While I have a number of concerns with the budget and how our tax dollars are being spent, today I am focusing on the particular concern I have with the amount of time and money that is being spent on pursuing district heating related to the Durham York incinerator (DYEC) under the false premise that this incinerator initiative helps us in the fight against climate change.

Incineration is bad for climate change. Furthermore, with the waste stream changing and having a higher density of plastics, carbon emissions are increasing.

These tax dollars are going to be spent on yet another attempt to greenwash the DYEC.

The truth is that the DYEC is a major emitter of carbon. The 2019 DYEC ECA Annual Report states 140,000 tonnes were thermally treated at the incinerator.<sup>1</sup> The total GHG emissions emitted in 2019 were 159,545 tonnes CO<sub>2</sub>e.<sup>2</sup>

That's massive.

Furthermore, Durham continues to rely on outdated assumptions to assert that incineration is better than landfill. In the recent Environmental Screening Report to increase capacity to 160,000 tpy, Durham used a 2007 EA report *Comparative Analysis of Thermal Treatment and Remote Landfill on a Lifecycle Basis* to assert that “the DYEC results in a net improvement of air emissions compared to landfill on a life-cycle basis”.<sup>3</sup> That 2007 report appears to reduce the incinerator's greenhouse gases impact by excluding biogenic carbon emissions.<sup>4</sup> According to the Energy Justice Network, the assumption that burning the biogenic fraction should not be counted towards a facility's greenhouse emissions has been thoroughly debunked by studies

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<sup>1</sup> 2019 DYEC ECA Annual Report, page 15, [https://www.durhamyorkwaste.ca/en/operations-documents/resources/Documents/2019\\_DYEC\\_Facility\\_Operations\\_Annual\\_Report.pdf](https://www.durhamyorkwaste.ca/en/operations-documents/resources/Documents/2019_DYEC_Facility_Operations_Annual_Report.pdf)

<sup>2</sup> Durham York Energy Centre Environmental Screening Report, December 2021 (ESR), Section 4.3.2, page 94; [https://www.durhamyorkwaste.ca/en/facility-approvals/resources/Documents/2021%20Environmental%20Screening%20Report/Accessible\\_2022/20220119\\_DYEC\\_ESR\\_FINAL\\_ACC.pdf](https://www.durhamyorkwaste.ca/en/facility-approvals/resources/Documents/2021%20Environmental%20Screening%20Report/Accessible_2022/20220119_DYEC_ESR_FINAL_ACC.pdf)

<sup>3</sup> ESR, Section 4.3.2, page 92

<sup>4</sup> Durham/York Residual Waste Study, Supplement to Annex E-5: Comparative Analysis of Thermal Treatment and Remote Landfill on a Lifecycle Basis, Jacques Whitford and GENIVAR, July 2007, page 6/10; [https://www.durhamyorkwaste.ca/en/facility-approvals/resources/Documents/Annex-E-5-Supplemental\\_Report.pdf](https://www.durhamyorkwaste.ca/en/facility-approvals/resources/Documents/Annex-E-5-Supplemental_Report.pdf)

including a major study done by the Department of Energy Resources for Massachusetts.<sup>5,6</sup> At the time of the Durham EA, Canadian environmental organizations, including the Canadian Environmental Law Association, Pembina Institute and the David Suzuki Foundation, produced fact sheets which showed incineration had higher GHG emissions than coal-fired plants.<sup>7</sup>

Look at what is happening in Denmark. Their climate ambitions to become carbon neutral are literally going up in smoke. To address this problem, they are reducing their incineration capacity by 30% which involves closing seven incinerators, some of which are involved with district heating. One of those on the Danish island of Bornholm, where they will now have to turn to burning biomass to provide the district heating with hopes of eventually using offshore wind power.

Please read:

<https://www.politico.eu/article/denmark-devilish-waste-trash-energy-incineration-recycling-dilemma/>

Look at what is happening in California. They are closing the last two incinerators as renewable energy subsidies have been withdrawn.

<https://jtalliance.org/2024/03/14/from-burning-to-building-our-future/>

Please also read about the shut down of the Detroit incinerator. One of the problems that delayed the shut down of this highly polluting incinerator was the fact of the dependence of many businesses and buildings on the district heating. With the shut down, the steam for that district heating will now be supplied by a natural gas burning facility.

Please read:

<https://www.detroitnews.com/story/news/local/detroit-city/2019/03/27/detroits-controversial-incinerator-permanently-shutting-down-today/3287589002/>

Thank you for your consideration of my letter.

Wendy Bracken

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<sup>5</sup> *Energy Justice Network, Trash Incineration and Climate Change: Debunking EPA Misinformation*, <http://www.energyjustice.net/incineration/climate>

<sup>6</sup> WBUR (Apr 2021). Mass. Backtracks on renewable energy subsidies for wood-burning biomass plants. <https://www.wbur.org/news/2021/04/16/rps-changes-biomass-renewable-energy-subsidies-springfield>

<sup>7</sup> *Incineration of Municipal Solid Waste, Impact on Global Warming, Fact Sheet 1*. [https://www.pembina.org/reports/Incineration\\_FS\\_Climate.pdf](https://www.pembina.org/reports/Incineration_FS_Climate.pdf)