

Independent Electricity Systems Operator
submitted via email efw@ieso.ca

October 30, 2015

RE: Energy from Waste Standard Offer Program (EFW SOP)

To whom it may concern,

The undersigned environmental organizations have express great concerns with the Standard Offer Program for municipal Energy From Waste being developed by the IESO at the direction of Minister Chiarelli.

We have written to Minister Chiarelli and Minister Murray to urge the government to cancel this program. In its current form, it runs counter to the Government's goals to address climate change through clean, renewable energy and a circular resource economy for zero waste in Ontario.

Please see the enclosed letter outlining our concerns, and note the recommendations for ensuring that EFW projects do not undermine green energy or waste reduction goals for Ontario.

Please do not hesitate to contact us for further information - Emily Alfred at Toronto Environmental Alliance at 416 596 0660 or emily@torontoenvironment.org.

Sincerely,

Toronto Environmental Alliance
Canadian Environmental Law Association
Citizens Environment Alliance of Southwestern Ontario
David Suzuki Foundation
Durham Environment Watch
Environmental Defence Canada
Environment Hamilton

Minister of Energy, Bob Chiarelli
via email to bchiarelli.mpp.co@liberal.ola.org
&

Minister of Environment & Climate Change, Glen Murray
via email to gmurray.mpp@liberal.ola.org

October 30, 2015

RE: Independent Electricity System Operator (IESO) Energy from Waste Standard Offer Program (EFW SOP)

Dear Minister Chiarelli and Minister Murray,

The undersigned environmental organizations are writing with great concern about the Standard Offer Program for municipal Energy From Waste being developed by the IESO at the direction of Minister Chiarelli.

We urge the government to cancel this program. In its current form, it runs counter to the Government's goals to address climate change through clean, renewable energy and a circular resource economy for zero waste in Ontario.

A poor source of energy

One of your Government's greatest achievements has been to phase out the use of coal for energy, a great step forward for health and the environment. However, encouraging the use of municipal solid waste for energy undermines this positive step. First, much of what is in garbage (eg. plastics) is fossil-fuel based. Burning it causes air pollution and GHG emissions. As well, burning organics creates unnecessary carbon emissions. In contrast, recycling and composting reduce GHG emissions and air pollution.

A bad way to manage waste

We know that 85-90% of the municipal solid waste stream is recyclable or compostable, yet most Ontario cities divert less than 50% of their waste. Instead of burning the remainder of this waste to generate a small amount of expensive energy, we can conserve far more energy and support local manufacturers by recycling and composting.

The much anticipated new waste legislation, the Waste Reduction and Resource Recovery Act accompanied by a Strategy, promises to dramatically change materials management in Ontario, promoting reuse and recycling by promoting extended producer responsibility that will save energy and support a local green economy. One of the draft goals is zero waste by 2050.

Thermal treatment or incineration of municipal solid waste works against that, as it destroys resources and materials, and relies on a constant flow of waste to operate. To make matters worse, the IESO draft program rules require that municipalities would have to guarantee a steady flow of mixed solid waste for 20 years.

Promising funds for EFW facilities for 20 year contracts for a Province that is on the verge of a new waste management framework makes no sense.

We urge you to cancel this program and ensure that no new EFW facilities put Ontario's green energy or waste reduction goals at risk.

Recommendations

1. We urge you to immediately cancel this program until new waste legislation is introduced.
2. We urge you to ensure that efforts to move the Province to zero waste through waste reduction and diversion efforts are not hindered by municipal EFW projects, especially any projects that receive Provincial subsidy. As such, we urge you to:
 - 1) Require that EFW facilities perform additional pre-sorting of waste to ensure that no hazardous, banned or otherwise excluded wastes are thermally treated.
 - 2) Require that EFW facilities are not permitted to treat the following wastes:
 - a) Recyclable material
 - b) Waste materials designated under stewardship / extended producer responsibility regulations
 - c) Waste materials that are banned from disposal (bans are an anticipated tool for the Resource Recovery Act)
 - 3) Require that EFW facilities test bottom ash for toxic chemicals and if toxic levels are found, increased pre-sorting of materials is required.
 - 4) Introduce penalties or conditions that EFW facilities that repeatedly exceed emissions limits for air or for bottom ash should face severe penalties.
 - 5) Amend O.Reg 101/07 to ensure that all new EFWs are subject to full Environmental Assessments (EA), not the Environmental Screening program under the regulation.

Please contact us to discuss these comments further. Contact Emily Alfred at the Toronto Environmental Alliance at 416 596 0660.

Sincerely,

Toronto Environmental Alliance
Canadian Environmental Law Association
Citizens Environment Alliance of Southwestern Ontario
David Suzuki Foundation
Durham Environment Watch
Environmental Defence Canada
Environment Hamilton

cc: IESO