



NPRI Off-site Transfers: What the public wants to know

Submitted to: Office of National Pollutant Release Inventory, Environment and Climate Change Canada

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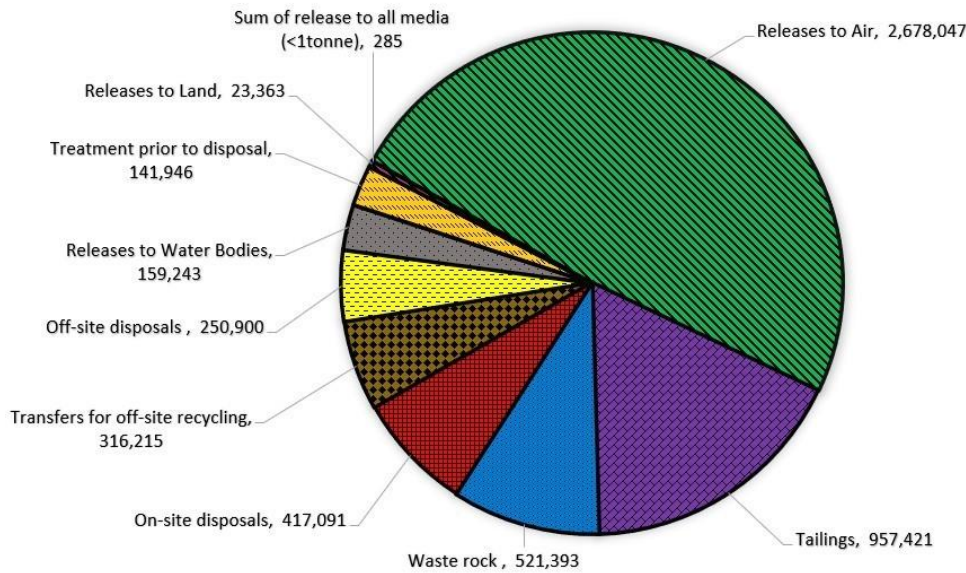
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Part 1: Introduction

A major purpose of the National Pollutant Release Inventory (NPRI) is to support community right-to-know. This includes the right-to-know what happens when NPRI pollutants are transferred off-site. This report analyses the status of off-site transfers and the public’s accessibility to NPRI data.

Image 1: Breakdown of the total quantities reported for 2024, by reporting category

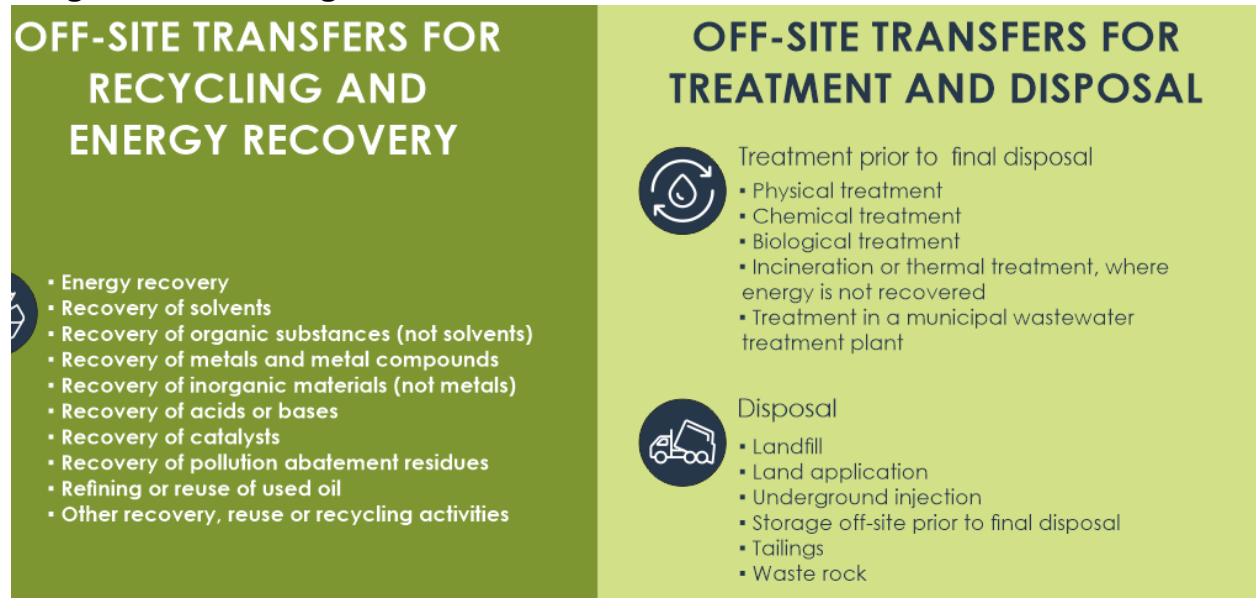


Source: Prepared by ECCC staff, March 2026¹

NPRI divides transfers off-site into two categories: off-site transfers for recycling and energy recovery, and off-site transfers for treatment and disposal. The activities of each category are listed in Image 2.

¹ Note: Some substances may be counted more than once. This can happen when a substance is transferred to a specialized waste management site and then sent to a final disposal site. As a result, combining reports from different facilities may lead to double counting.

Image 2: Off-site categories



Source: *Guide for Reporting to the National Pollutant Release Inventory, 2025-2027*, Environment & Climate Change Canada, p. 16

Between 2020 and 2024, the total for on-site releases (releases to air, releases to water bodies, releases to land, sum of releases to all media (<1 tonne), and on-site disposal) increased from 4,753,367 tonnes (2020) to 4,945,162 tonnes (2024) increasing 4%. Off-site disposal, transfers for treatment prior to final disposal, and transfers off-site for recycling increased from 2,133,595 tonnes (2020) to 2,604,968 tonnes (2024) - an increase of 22%.²

This means that in 2020, on-site releases and disposal were 68.9% of the total pollution reported to the NPRI. In that year, off-site disposal, treatment and recycling were 30.9% of the total pollutants. In 2024, on-site releases and disposal were 65.5% of the total and off-site disposal, treatment and recycling were 34.5%.

These higher increases in off-site transfers show the need to put a special emphasis on the handling of and destination of off-site transfers and the need to assess the implications for those communities that contain the facilities that pollutants are transferred to.

² See Table 3 in Part 3 for the sources of this data.

Part 2: What the Public wants to know

We need to put special emphasis on the right-to-know for people who live in communities that are the receivers of NPRI substances transferred to them, because it is a growing part of the pollution reported to the NPRI.

Some people see increases in off-site transfers as an indicator of progress because some of it is going to off-site recycling and other treatment and because it is going to disposal in off-site landfills that are specially approved for hazardous substances. But is it really safer? Most of it is going to off-site for disposal and treatment. As this paper shows in this section below and in Part 3, pollutants are emitted from these off-site pollutant receiving facilities.

For example, some people presume that being landfilled or incinerated separates pollutants from the environment. This is inaccurate. The question must be posed of whether we are getting the full data on what is discharged from a landfill, e.g., taken off-site in leachate to sewage treatment plants, going directly into the surrounding water table, or released to air through the top of a landfill. If it is going to recycling, it is still likely that NPRI pollutants will be transferred to the air from the off-site recycling facility; also residues are likely left over from the recycling process that will end up going to disposal.

Off-site transfers matter:

- a. For a community receiving the off-site materials it is significant since these pollutants become present in their community.
- b. Transfers off-site contain many pollutants (including toxic substances).
- c. The number of facilities receiving is smaller than the number that are on-site facilities. This means that there is a concentration of pollutants (including toxic substances) from many facilities across the country or further away into a relatively small number of communities. Therefore, to compare the number of facilities receiving the off-site transfers with the number of communities that sent NPRI substances off-site is an environmental injustice for the receiving communities.

Also transferring pollutants off-site is a pollution control mechanism – not a pollution prevention (P2) method, where transfers elsewhere would be minimized. P2 is the top priority to demonstrate progress that facilities are avoiding the release or transfer of these pollutants through decisions made at the front end of the facility's processes. Increasing transfers off-site may take the focus of the company away from pollution prevention actions.

Transfer of pollutants off-site from one facility moves the problem to other communities. Therefore, the public wants to know where pollutants go when they are sent off-site and to know what releases, disposals, etc. occur both on- and off-site at the receiving facility.

For fifty years, P2 has been described as the preferred way to avoid pollution problems. P2 contrasts with the traditional pollution control approach, which still dominates industry. “The goal in pollution prevention is always to eliminate the use and creation of toxic substances. In pollution control, reduction is the goal – not elimination.”³

To achieve P2, the changes need to be made at the facility that used the substance or processes that created the pollutants. To protect both the home community and the community that would receive those substances, and the problems that they cause, P2 must be the priority. This is true even for a facility that is supposedly carrying out an environmentally positive function, e.g., recycling.

The public also wants to know:

- Which facilities in their community are transferring pollutants off-site, if any, how they compare with other facilities in the same sector, and have information that helps the public ask their local facility what can be done to better protect all communities involved.
- The extent to which specific sectors are transferring off-site, how safe those sites are, and information that may help them know what actions should be taken to improve the situation on a sector-wide basis.
- The relative changes over the years between on-site releases, on-site disposal, off-site disposal, and recycling, which provides an indicator of the extent to which pollutants are being passed on to other facilities.
- The problems created by a particular pollutant and a way to understand the extent and methods the facilities could use to achieve P2 instead of transferring pollutants off-site and relying on different kinds of off-site treatment. This can help them advocate for better activities involving the substance.

Most of what is done with transferred substances is contrary to P2, which requires being at the top of the waste hierarchy, i.e., prevention. For example, the 234,206 tonnes of NPRI substances that were disposed off-site in 2024 are at the very bottom of the hierarchy. Likewise, the 20,000 tonnes transferred off-site for incineration/thermal treatment and the 9,049 tonnes used for energy generation are all seen as disposal in the Canadian system. The 335,355 tonnes that were sent off-site for recycling, recovery, refining and reuse in 2024 are part way up the waste hierarchy.⁴ Although the latter is a more positive step, it inevitably results in pollution in the receiving community and is, therefore, only part way up the waste hierarchy.

To protect all life in Canada, we must always have pollution prevention as our priority. Off-site transfers always transfer pollutants to another community, where there will inevitably be some releases to the environment.

³³ <https://cela.ca/wp-content/uploads/2024/04/Pollution-Prevention-NPRI-%E2%80%93-ENGO-Assessment.pdf>, p.2.

⁴ See Table 3, Total reported quantity tonnes by category, 2020-2024.

The Horne Smelter (Glencore Canada) Example

Glencore Canada operates the Horne smelter in Rouyn-Noranda. Glencore describes itself as follows:

“At Horne Smelter, we recover copper, gold, silver, platinum, palladium, and other metals from such electronics. We work with large manufacturing and processing companies around the world, providing them with environmentally friendly recycling solutions.”⁵

In 2024, the Horne facility [NPRI ID 3623] released 14,091.85 kilograms (kg) of arsenic to the air and 71.94 kg directly to two lakes (Lac Pelletier and Lac Rouyn). In the same year they released 1,363.04 kg of cadmium to the air, and 64.22 kg of cadmium to the lakes. They also released 54,001.69 kg of lead to the air, and 32.83 kg to the lakes. These are substances that NPRI requires to be reported at the kg level instead of the regular tonne level because they are so dangerous to human and environmental health. In addition, these are substances that persist and build-up in the environment. According to NPRI data, 735,024 kg of lead were discharged into the air between 2014 and 2024 at the Rouyn facility. Similar situations would have occurred for arsenic and cadmium. Although some of these materials are recovered instead of sent off-site for recycling, these activities have the effect of threatening the health of humans and wildlife living in the area.

Most of the output from the Horne Smelter is sent to Glencore Canada Corporation, CCR (Canadian Copper Refinery) in Montréal-Est (NPRI ID 3916). The company describes this operation as follows:

“The Canadian Copper Refinery (CCR), part of the Glencore group, is a world-class, modern and competitive copper and precious metals refinery. It is in its facilities in Montreal East, the only ones of its kind in North America, that we give precious metals all their nobility, copper their purity, and other metals their specific characteristics.”⁶

Between 2014 and 2024, 17,444 kg of lead and 5,868 kg of arsenic were released into the air from the CCR facility as well as other very toxic substances.

In 2018, a report from the Montreal Regional Public Health Department predicted that arsenic concentrations in Montréal Est were on track to reach 200% of the limit set by Quebec.⁷ A 2020 report from the Public Health Department shows that while arsenic levels in air coming from the CCR were decreasing, they remained above provincial health

⁵ <https://www.glencore.ca/en/horne/ce-que-nous-faisons/nos-operations#-converters->

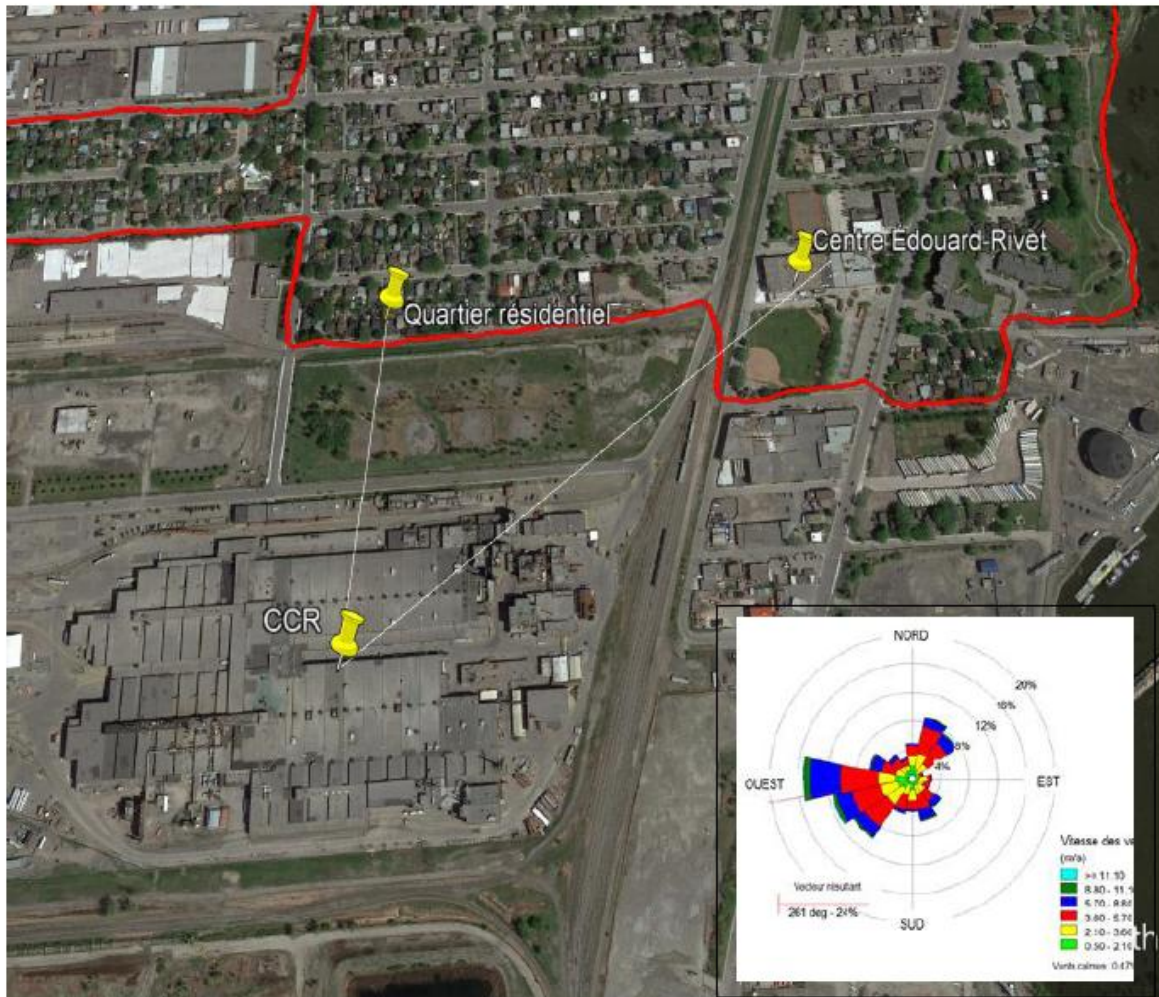
⁶ <https://www.glencore.ca/en/ccr>

⁷ Avis de santé publique sur les émissions atmosphériques de l'affinerie de cuivre CCR de Montréal-Est Centre intégré universitaire de santé et de services sociaux du Centre-Sud-de-l'Île de Montréal Karine Price, Louis-François Tétreault, Anne-Frédérique Lambert-Slythe Service: Environnement urbain et saines Habitudes de vie le 21 août 2018.

standards.⁸ There is concern that long-term exposure to these contaminants could have harmful effects on the health of the affected residents.

A residential zone is within 200 metres of this polluter. See Figure 1.

Figure 1. Secteur de Montréal-Est avoisinant l'affinerie CCR et rose des vents



In this example, we see that pollutants (including many toxic materials) from many communities are being sent to a smelter in Rouyn-Noranda, where it is polluting the surrounding environment, and then some of it is sent to a facility at Montréal-Est, where it pollutes the environment and people there.

⁸ Avis de la Direction régionale de santé publique sur les émissions atmosphérique d'arsenic dans l'est de Montréal en 2019. Centre intégré universitaire de santé et de services sociaux de Centre-Sud-de-L'Île-de-Montréal DRSP-MLT 2020; and Est de Montréal: une cohabitation devenue toxique, 4 janvier 2019, La Presse, Sara Champagne.

In addition to local pollution, the CCR facility transfers waste to the Stablex Landfill. For example, in 2024 CCR sent 10,678.48 kg of arsenic to the Stablex landfill in Blainville, north of Montreal. It also sent wastes to the municipal sewage treatment plant at 12001 Maurice-Duplessis Blvd Northeast in Montréal [NPRI ID 3571]. For example, it sent 276.57 kg of arsenic there. In turn, in 2024 the municipal sewage treatment plant sent 1,156.26 kg of arsenic, cadmium, cobalt, copper, lead, mercury, and selenium to off-site land treatment, i.e., making of granules used as a fertiliser on non-human or non-animal food lands, such as tree farms, brown field remediation, etc. None of it goes to crop land. And this is not the end of the trail. CCR ships NPRI pollutants to Europe. See Part 7 on exports and imports of NPRI substances.

Facilities should aim to reduce pollution to surrounding communities. This effort would involve reducing pollution from all facilities, as well as reducing transfers of pollution to other facilities and other communities.

Knowledge of the NPRI off-site transfers can help the public become more effective advocates for essential actions that protect the environment and all life.

Part 3: Analysis of NPRI off-site data

In Part 3, we summarize some of the data we have developed on off-site transfers using the NPRI. This report is primarily based on comparisons between 2020 and 2024 data. Please note that the numbers we pulled down from the NPRI site aren't the same as the NPRI data in Image 1 because changes occur in the data as facilities make corrections to their submissions. For this report, we updated our NPRI data that we pulled down from the NPRI site on April 9, 2026.

On-site data in comparison with off-site data:

In 2020, off-site transfers and off-site disposal made up 30.98% of total pollutants reported to NPRI. In 2024, off-site transfers and disposal increased to 34.5% of total pollutants.

Between 2020 and 2024, the total for on-site releases (releases to air, releases to water bodies, releases to land, sum of releases to all media (<1 tonne), and on-site disposal) increased from 4,753,367 tonnes (2020) to 4,945,162 tonnes (2024) increasing 4%. Off-site disposal, transfers for treatment prior to final disposal and transfers off-site for recycling increased from 2,133,595 tonnes (2020) to 2,604,968 tonnes (2024) - an increase of 22%.

Table 1 - Sum of Releases to air, water bodies, land, sum of release to all media (<1 tonne), off-site disposal, off-site Transfers for Treatment Prior to Final Disposal, Off-site Transfers for recycling, 2020 and 2024

Release / disposal / transfer grouping	2020	2021	2022	2023	2024	Total
Releases to Air	2,716,235.39	2,765,675.43	2,739,327.60	2,627,676.96	2,542,681.12	13,391,596.50
Releases to Water Bodies	137,952.22	131,408.08	138,313.00	137,539.28	159,268.55	704,481.14
Releases to Land	9,075.16	16,257.31	17,261.60	20,444.44	23,363.28	86,401.79
Sum of release to all media (<1tonne)	298.91	308.39	282.21	270.77	285.74	1,446.02
On-site Disposal	1,636,061.05	1,521,300.55	1,577,020.38	1,568,629.66	1,891,084.71	8,194,096.35
Off-site Disposal	155,606.85	157,742.67	115,882.24	233,669.74	234,206.25	897,107.75
Off-site Transfers for Treatment Prior to Final Disposal	50,469.83	46,980.29	52,774.44	51,518.32	141,723.29	343,466.17
Off-site Transfers for Recycling	292,594.63	313,881.94	296,600.11	341,271.44	335,355.77	1,579,703.89
Total	4,998,294.03	4,953,554.66	4,937,461.58	4,981,020.61	5,327,968.72	25,198,299.60

Source: NPRI, Dashboard, April 9, 2026

Table 2: Releases to air, Water bodies, Land, Sum of Release to all media (<1 tonne), On-site disposal, Off-site Disposal, Off-site Transfers for Treatment Prior to Final Disposal and Off-site Transfers for Recycling and Changes over time (percentage) from 2020 and 2024

Type	2020 (tonnes)	2024 (tonnes)	%change over time
Releases to Air	2,716,235	2,542,681	Decrease 6%
Releases to Water Bodies	137,952	159,268	Increase 15%
Releases to Land	9,075	23,363	Increase 157%
sum of release to all media (<1 tonne)	299	286	Decrease 4%
Totals for releases to air, water bodies, releases to land and sum of releases to all media (<1 tonne),	2,863,561	2,725,598	Decrease 5%
On site Disposal	1,636,061	1,891,085	Increase 16%
Total sum: Releases to air, water bodies, land, sum of release to all media (<1 tonne) and on-site disposal	4,499,622	4,616,683	Increase 3%
Off-site Disposal	155,607	234,206	Increase 50%
Offsite-Transfers for Treatment Prior to Final Disposal	50,470	141,273	Increase 180%
Off-site Transfers for Recycling	292,595	335,356	Increase 15%
Total for Off site disposal, Transfers for Treatment Prior to Final Disposal, Off site Transfers for Recycling	498,672	710,835	Increase 42%
Total for Transfers for Treatment Prior to Final Disposal, Off site Transfers for Recycling	343,065	476,629	Increase 39%

There has been an increase in on-site releases water bodies, land and on-site disposal as well as all categories for transfers off-site for disposal, transfers for treatment prior to final disposal, and transfers for recycling between 2020 and 2024.

Table 2 shows that off-site transfers for treatment prior to final disposal resulted in the greatest increase by 180%, followed by 50% increase for off-site disposal between 2020 and 2024. During the same period, on-site disposal increased by 16%.

Between 2020 and 2024, total for on-site releases (releases to air, releases to water bodies, releases to land, sum of releases to all media (<1 tonne), and on-site disposal) increased from 4,499,622 tonnes (2020) to 4,616,683 tonnes (2024) an increase of 3%. Sum of off-site

transfers for treatment prior to final disposal and transfers off-site for recycling increased from 343,065 tonnes (2020) to 476,629 tonnes an increase of 39%

Table 3: On-site disposal, Off-site Transfers for Treatment Prior to Final Disposal, and Off-site Transfers for Recycling (details of categories), 2020-2024

< Back to report		TOTAL REPORTED QUANTITY (TONNES), BY CATEGORY				
Release / disposal / transfer grouping	Detailed category	2020	2021	2022	2023	2024
On-site Disposal	Land Treatment	2,343.64	9,173.70	6,470.22	12,784.41	4,189.46
	Landfill	73,973.62	76,802.70	46,797.75	44,417.92	73,882.00
	Tailings Management	838,007.09	825,396.72	893,751.01	872,546.44	951,697.30
	Underground Injection	236,609.06	228,821.72	367,417.17	382,716.99	339,884.85
	Waste Rock management	485,127.64	381,105.70	262,584.24	256,163.90	521,431.11
Off-site Disposal	Land Treatment	14,090.10	13,197.56	14,646.25	12,495.22	13,112.79
	Landfill	50,181.55	29,766.09	55,004.36	44,001.46	38,061.95
	Storage	2,558.95	4,835.99	5,215.74	8,897.27	5,482.41
	Tailings Management	1,694.74	2,919.97	3,362.43	4,015.00	5,347.00
	Underground Injection	87,075.38	107,015.12	37,649.56	164,260.22	172,176.60
	Waste Rock management	6.14	7.95	3.90	0.57	25.51
Off-site Transfers for Treatment Prior to Final Disposal	Biological Treatment	313.75	512.05	463.53	246.33	479.92
	Chemical Treatment	7,021.07	9,230.59	13,337.93	16,597.87	21,814.81
	Incineration / Thermal	19,004.78	15,278.12	12,247.59	12,561.24	20,000.92
	Municipal Sewage Treatment Plant	17,804.01	12,906.16	19,463.72	15,989.63	92,010.26
	Physical Treatment	6,326.22	9,053.37	7,261.67	6,123.25	7,417.37
Off-site Transfers for Recycling	Energy Recovery	18,033.34	14,522.54	11,523.81	7,560.23	9,049.61
	Other	6,771.37	7,872.25	8,036.99	13,218.24	11,284.76
	Recovery of Acids and Bases	125,470.25	131,820.68	128,477.61	146,472.24	141,531.79
	Recovery of Catalysts	2,054.84	5,004.38	2,925.24	6,426.83	6,526.74
	Recovery of Inorganic Materials (not metals)	4,862.52	5,774.65	10,513.06	11,392.82	12,472.55
	Recovery of Metals and Metal Compounds	104,139.52	118,181.17	105,847.63	126,099.71	121,702.83
	Recovery of Organic Substances (not solvents)	21,812.26	22,621.04	19,191.46	20,481.53	6,815.53
	Recovery of Pollution Abatement Residues	1,796.65	1,863.23	1,591.85	823.90	999.75
	Recovery of Solvents	6,066.57	5,443.15	7,613.48	7,871.94	6,373.87
	Refining or Re-use of Used Oil	1,587.31	778.84	878.99	924.01	18,598.34

Source: NPRI, Dashboard, April 9, 2026

Pollutants in Off-site:

The tables below show the top 10 pollutants for off-site disposal (Table 4), off-site transfers for treatment prior to final disposal (Table 5), and off-site transfers for recycling for 2024 (Table 6). As can be seen from these tables, significant quantities of pollutants are being sent to communities where off-site receiving facilities are located.

Table 4 - Top 10 pollutants (Part 1, 2 and 3): Off-site Disposal, 2024

Pollutant Name	Off-Site Disposal, 2024
Hydrogen sulphide	160,896 tonnes
Phosphorus (total)	12,045 tonnes
Zinc (and its compounds)	11,205 tonnes
Calcium fluoride	8,519 tonnes
Methanol	8,262 tonnes
Nickel and its compounds	546tonnes
Sulphuric Acid	4,649 tonnes
Ammonia (total)	4,229 tonnes
Copper (and its compounds)	2805 tonnes
Manganese (and its compounds)	2770 tonnes
Lead (and its compounds)	2,654 tonnes

Source: NPRI, Dashboard, April 9, 2026

Table 5 - Top 10 pollutants: Off-site Transfers Treatment Prior to Final Disposal,

Pollutant Name	Off-Site Transfers for Treatment Prior to Final Disposal, 2024
Ammonia (total)	67,286 tonnes
Ethylene glycol	17,706 tonnes
Methanol	6,759 tonnes
Toluene	3,591 tonnes
Sodium Fluoride	3,538 tonnes
Nitrate ion in solution at pH	3,474 tonnes
Isopropyl alcohol	3,332 tonnes
Zinc (and its compounds)	2,537 tonnes
Hydrogen sulphide	2,195 tonnes
Xylene (all isomers)	2,166 tonnes

Table 6 - Top 10 Pollutants: Off-site Transfers for Recycling, 2024

Pollutant Name	Off Site Transfers for Recycling, 2024
Sulphuric acid	144,181 tonnes
Zinc (and its compounds)	43,371 tonnes
Copper (and its compounds)	19,375 tonnes
Manganese (and its compounds)	13,913 tonnes
Xylene (all isomers)	9,726 tonnes
Toluene	8,657 tonnes
Ethylene glycol	7,952 tonnes
Calcium fluoride	7,462 tonnes
Phosphorus (total)	6,380 tonnes
Chromium (and its compounds)	5,124 tonnes

Sectors that transfer pollutants off-site:

Table 7: Off-site Transfers for Treatment Prior to Final Disposal and Off-site Transfers for Recycling, sectors, 2020-2024

Sector	2020	2021	2022	2023	2024
Aluminum	2,253.43	1,794.27	5,535.33	6,756.50	5,758.84
Cement, Lime and Other Non-Metallic Minerals	191.65	176.68	5,321.63	34,612.27	29,533.17
Chemicals	17,480.57	21,005.85	20,674.58	16,135.16	16,983.17
Conventional Oil and Gas extraction	1,659.48	1,218.38	1,985.30	2,874.73	4,676.00
Electricity	3,822.36	1,486.64	1,171.69	1,056.75	967.41
Iron and Steel	21,504.16	30,134.98	30,310.47	25,229.49	25,232.43
Metals (Except Aluminum and Iron and Steel)	56,911.07	69,224.91	49,489.43	58,736.55	64,348.82
Mining and Quarrying	755.82	1,038.77	2,735.29	337.48	1,051.02
Non-Conventional Oil Extraction (including Oilsands and Heavy Oil)	2,366.77	5,675.80	5,387.18	7,675.41	6,505.62
Oil and Gas Pipelines and Storage	16,216.12	15,215.67	11,936.76	11,460.85	12,562.63
Other (Except Manufacturing)	11,132.43	4,976.06	9,307.67	10,548.44	22,090.72
Other Manufacturing	26,487.40	30,252.95	28,979.09	29,563.65	30,238.84
Petroleum and Coal Product Refining and Mfg.	110,529.54	114,318.66	116,502.68	132,169.85	127,130.44
Plastics and Rubber	797.21	990.84	683.99	702.96	821.79
Pulp and Paper	1,357.03	607.79	646.30	672.16	740.34
Transportation Equipment Mfg.	15,224.36	11,846.72	13,276.01	13,210.90	14,530.61
Waste Treatment and Disposal	44,710.51	40,177.98	32,150.33	28,248.88	100,393.95
Water and Wastewater Systems	9,412.18	10,474.71	13,132.91	12,680.31	13,372.25
Wood Products	252.35	244.57	147.91	117.44	141.02

Source: NPRI, Dashboard, April 9, 2026

Table 8: Top 5 sectors for Sum of Off-site Transfers for Treatment Prior to Final Disposal and Off-site Transfers for recycling, sector, 2024

Sector	Total for Off-site Transfers for Treatment Prior to Final Disposal and Off-site Transfers for Recycling, 2024 (tonnes)
Petroleum and coal product Refining andMfg.	127,130
Waste treatment and disposal	100,394
Metals (Except Aluminum and Iron and Steel)	64,349
Other Mfg	30,239
Cement Lime and other non-metallic Materials	29,533

Based on Table 7 on transfers off-site for treatment prior to disposal and off-site transfers for recycling, the following sectors had the most significant increases between 2020 and 2024: cement, lime and other non-metallics (15,282%); aluminum (236%); non-conventional oil extraction (including oilsands and heavy oil) (175%); waste treatment and disposal (124%); other (except manufacturing) (98%); conventional oil and gas extraction

(73%); mining and quarrying (except for manufacturing) (39%); water and wastewater systems (34%); and oil and steel (17%).

The following sectors had decreased transfers between 2020 and 2024: electricity (-75%); pulp and paper (-45%); oil and gas pipelines and storage (-23%); transportation equipment manufacturing (-4.6%); and chemicals (-2.8%).

Further analysis of some sectors:

Conventional Oil and Gas

Image 3: Sum of Off-site disposal, Off-site Transfers for Treatment Prior to Final Disposal and Off-site Transfers for Recycling, Conventional Oil and Gas Extraction, 2020-2024

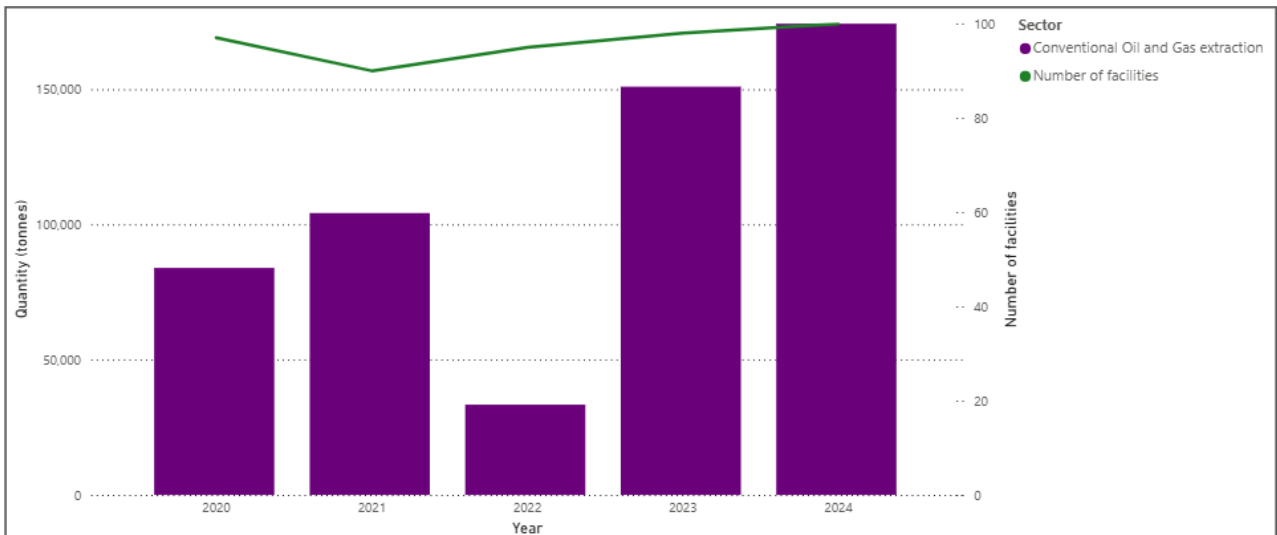
Choose how to display the data:

Which years do you want to see data for?

2020 2024

Releases, disposals and transfers (by sector):

For more information on how to use and interpret NPRI data, including an overview of changes to the program over time, please see the page [Using and Interpreting data from the NPRI](#)



Total reported quantity (tonnes), by sector

Sector	2020	2021	2022	2023	2024
Conventional Oil and Gas extraction	83,937.36	104,240.93	33,383.48	150,974.23	174,260.79

Table 9: Summary of Off-site Disposal, Off site Transfers for Treatment Prior to Final Disposal and Off-site Transfers for Recycling, 2020-2024

Release / disposal / transfer grouping	2020	2021	2022	2023	2024	Total
Off-site Disposal	82,277.88	103,022.55	31,398.18	148,099.50	169,584.79	534,382.90
Off-site Transfers for Treatment Prior to Final Disposal	22.32	0.73	47.26	534.57	2,310.43	2,915.30
Off-site Transfers for Recycling	1,637.16	1,217.66	1,938.04	2,340.16	2,365.57	9,498.59
Total	83,937.36	104,240.93	33,383.48	150,974.23	174,260.79	546,796.79

Source: NPRI, Dashboard, April 9,2026

The Conventional Oil and Gas Extraction sector increased 108% from 83,937 tonnes (2020) to 174,261 tonnes (2024), when off-site disposal is included (see Appendix, Table 13).

For the conventional oil and gas sector, the largest increase by percentage between 22 tonnes (2020) and 2,310 tonnes (2024) was for off-site transfers for treatment prior to final disposal at 10,400%, while for the same timeframe, off-site disposal increased by 106% from 82,278 tonnes (2020) and 169,585 tonnes (2024), and off-site transfers for recycling increased by 44% from 1,637 tonnes (2020) to 2,366 tonnes (2024).

The Appendix at the end of the report presents changes overtime of the sum of off-site disposal, off-site transfers for treatment prior to final disposal and off-site transfers for recycling for selected sectors.

Waste Management and Disposal Sector:

Image 4: Sector Waste Treatment and Disposal: Sum of Off-Site Disposal, Off-Site Transfers for Treatment Prior to Final Disposal and Off-Site Transfers for Recycling, 2020-2024

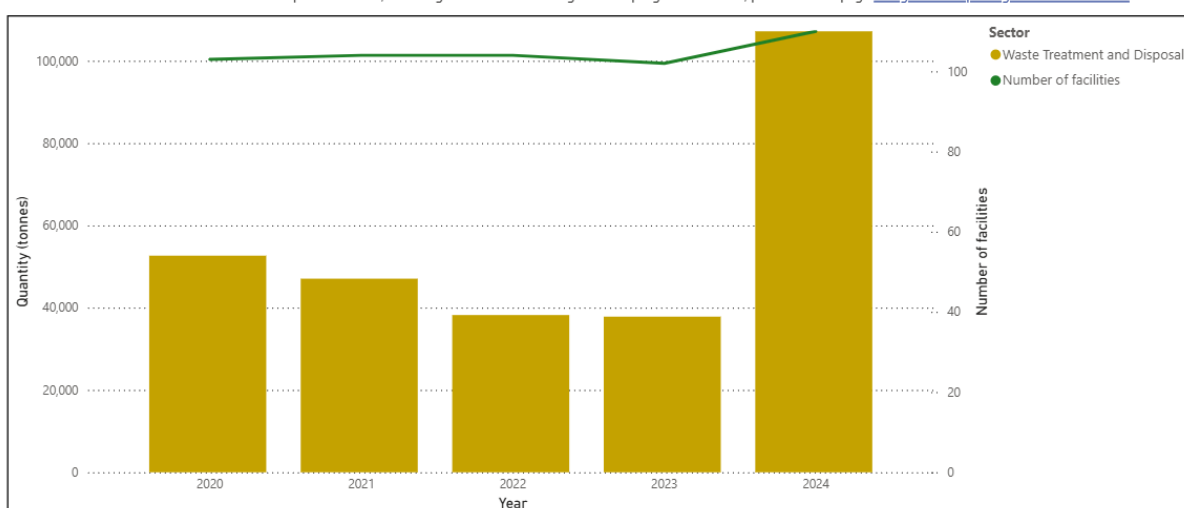
Choose how to display the data:

By Sector By Substance By Facility By Province By Release Type

Which years do you want to see data for?
 2020 2024

Releases, disposals and transfers (by sector):

For more information on how to use and interpret NPRI data, including an overview of changes to the program over time, please see the page [Using and Interpreting data from the NPRI](#)



Total reported quantity (tonnes), by sector

Sector	2020	2021	2022	2023	2024
Waste Treatment and Disposal	52,647.76	47,060.02	38,217.40	37,825.46	107,184.72

Source: NPRI, Dashboard, April 9, 2026

Table 10: Off-site Disposal, Off-site Transfers for Treatment Prior to Final Disposal, and Off-site Transfers for Recycling, Waste Treatment and Disposal sector, 2020-2024,

Release / disposal / transfer grouping	2020	2021	2022	2023	2024	Total
Off-site Disposal	7,937.25	6,882.03	6,067.07	9,576.58	6,790.78	37,253.71
Off-site Transfers for Treatment Prior to Final Disposal	15,568.27	12,096.28	10,511.20	8,271.19	78,410.77	124,857.71
Off-site Transfers for Recycling	29,142.24	28,081.71	21,639.13	19,977.68	21,983.18	120,823.94
Total	52,647.76	47,060.02	38,217.40	37,825.46	107,184.72	282,935.36

Source: NPRI, Dashboard, April 9 2026

In the Waste Treatment and Disposal sector, off site transfers for treatment prior to final disposal increased by 403% from 15,568 tonnes (2020) to 78,410 tonnes (2024) . Off site

transfer for recycling decreased 24% from 29,142 tonnes (2020) to 21,983 tonnes (2024) (See Table 10).

The following table (Table 11) provides more details for the Waste Treatment and Disposal Sector for Off-site Disposal, Off-site Transfers for Treatment Prior to Final Disposal and Off-site Transfers for Recycling, 2020 – 2024

Table 11: Waste Treatment and Disposal Sector for Off-site Disposal, Off-site Transfers for Treatment Prior to Final Disposal and Off-site Transfers for Recycling (details for each category), 2020 – 2024

Release / disposal / transfer grouping	2020	2021	2022	2023	2024	Total
Off-site Disposal	7,937.25	6,882.03	6,067.07	9,576.58	6,790.78	37,253.71
Land Treatment		1.14	1.16	9.73	1.09	13.12
Landfill	7,505.26	6,469.94	5,824.62	5,673.23	6,596.69	32,069.74
Storage	120.09	257.43	134.20	3,843.14	47.21	4,402.08
Underground Injection	311.90	153.53	107.08	50.48	145.78	768.77
Waste Rock management	0.00	0.00				0.00
Off-site Transfers for Treatment Prior to Final Disposal	15,568.27	12,096.28	10,511.20	8,271.19	78,410.77	124,857.71
Chemical Treatment	315.80	219.31	430.13	306.32	3,533.28	4,804.84
Incineration / Thermal	11,959.23	8,330.88	5,663.80	6,599.34	12,042.14	44,595.39
Municipal Sewage Treatment Plant	802.75	615.75	713.65	636.47	62,445.84	65,214.45
Physical Treatment	2,490.49	2,930.34	3,703.62	729.06	389.52	10,243.03
Off-site Transfers for Recycling	29,142.24	28,081.71	21,639.13	19,977.68	21,983.18	120,823.94
Energy Recovery	16,344.46	11,795.81	9,311.95	5,902.34	7,420.08	50,774.63
Other	1,217.78	8.80	249.30	503.21	2,291.94	4,271.04
Recovery of Acids and Bases	10.30					10.30
Recovery of Inorganic Materials (not metals)	84.60	94.34				178.94
Recovery of Metals and Metal Compounds	8,255.54	8,875.25	6,652.81	2,793.68	2,443.79	29,021.07
Recovery of Organic Substances (not solvents)	2,260.19	4,906.67	3,740.03	6,776.45	4,398.71	22,082.05
Recovery of Pollution Abatement Residues		506.88				506.88
Recovery of Solvents	897.72	1,248.90	1,168.51	3,817.27	593.18	7,725.59
Refining or Re-use of Used Oil	71.66	645.05	516.53	184.74	4,835.48	6,253.45
Total	52,647.76	47,060.02	38,217.40	37,825.46	107,184.72	282,935.36

Source: NPRI, Dashboard, April 9, 2026

For off-site transfers for treatment prior to final disposal, all methods (Chemical treatment, incineration/thermal, Municipal Sewage Treatment Plant) increased between 2020 and 2024 except physical treatment which decreased by 88% during the same time period.

For off-site transfers for recycling, most off-site transfers methods (i.e., Energy Recovery, Recovery of Metals and Metal Compounds, Recovery of Solvents) decreased between 2020 and 2024, except for the following methods categories: Other, Recovery of Organic Substances (not solvents), and Refining or Re-use of Used Oil which showed increasing numbers. (See Table 11)

Examples of substances transferred off-site by the Waste Treatment and Disposal sector include:

- Ammonia (total): Summary of off-site disposal, Off-site Transfers for Treatment Prior to Final Disposal and Off-site Transfers for Recycling increased by 7,541% from 816 tonnes (2020) to 62,349 tonnes (2024)
- Selenium and its compounds: 18,739 kg (2020) and 91,682 kg (2024) increased by 389%
- Cadmium and its compounds: 45,053 kg (2020) and 281,072 kg (2024) increased by 524%%
- Arsenic and its compounds: 21,836 kg (2020) and 63,562 kg (2024) increased by 191%

Deeper exploration for ammonia (total) under the Waste Treatment and Disposal sector for Off-site Transfers for Treatment Prior to Final Disposal and Off-site Transfers for Recycling is shown in Table 12 below.

Table12: Ammonia - Off-site Transfers for Treatment Prior to Final Disposal and Off-site Transfers, 2020-2024

Release / disposal / transfer grouping	2020	2021	2022	2023	2024	Total
Off-site Transfers for Treatment Prior to Final Disposal	801.49	614.48	712.43	634.54	62,348.77	65,111.69
Municipal Sewage Treatment Plant	801.49	614.48	712.43	634.54	62,348.77	65,111.69
Off-site Transfers for Recycling	14.18		13.00			27.18
Recovery of Organic Substances (not solvents)	14.18		13.00			27.18
Total	815.67	614.48	725.43	634.54	62,348.77	65,138.87

Source: NPRI, Dashboard, April 9, 2026

For ammonia (total) in this sector is being sent to Municipal Sewage Treatment Plant while a small amount is being sent for recycling. (See Table 12)

Examples of substances showing decreases in off-site transfers for treatment prior to final disposal and off-site transfers for recycling between 2020 and 2024 include:

- Lead (and its compounds),
- Mercury (and its compounds), and
- nonylphenol and ethoxylates.

Part 4: Does the NPRI provide the needed off-site transfers data

To assess the adequacy of off-site transfers data for community members to perform the analysis they wish to, we evaluated the NPRI system using the following criteria:

- Is the information easily accessible to the public?
- Is it easy to use the data to carry out analyses and evaluations?
- Is the information detailed enough to be able to understand what is happening?
- Is it easy to carry out cross-searches, e.g., a search for all facilities with off-site transfers for a specific substance?

In this study, we are looking at two types of facilities:

- Facilities that transfer pollutants off-site, and
- Facilities that are the recipients of off-site transfers. These facilities may also have their own off-site transfers.

For all facilities we need to know:

- Is the information available separately for each substance?
- Is the information available by each facility?
- Is the information available by each sector?
- Is the information available for all facilities within a community or region?
- Is the information easily available over the full range of NPRI reporting?
- Is the information available over the years that NPRI has existed?

For facilities transferring NPRI pollutants off-site, we need to also know:

- Are the transfer categories accurate and properly divided? Is reporting by each sub-category?
- Does the data show the extent to which the off-site transfers to each category of substances each decreased or increased over time?
- Is there an explanation for why off-site transfers increased or decreased from year-to-year by substance?
- Are clean-up wastes transferred off-site included, and is that listed separately in the NPRI report?
- Is the method for the reporting data provided by substance?
- Is an estimate of degree of reporting accuracy provided by substance?
- Is the name of the receiving facility and its location to which each transfer is sent for disposal, treatment, energy generation, etc. provided? Is the amount of NPRI substance sent to that facility and the purpose(s) for which it was sent provided? Is the name provided by the reporting facility the same name as the facility has in the NPRI reporting list? Is the facility sent to a non-NPRI reporting facility? Whether it is or not is the same data provided as they would have for a NPRI reporting facility?

- If the transfer is to a location outside of Canada, is the location and facility name and other information as previously listed still provided?
- Are any of the pollutants reported under NPRI subject to permits if they are transferred off-site for treatment or recycling?

For facilities receiving NPRI pollutants that other facilities sent to them from off-site, we need to know:

- Do they tell from where (facility name, location, and by NPRI substance, and quantity) the transfers were sent from?
- Do they tell amounts etc. of NPRI pollutants sent from outside of Canada to the receiving facility? Do they report these with the same amount of detail as the off-site reporting for facilities in Canada.
- These receiving facilities are also likely to be polluters. Therefore, they must complete the same NPRI reporting for their own facility. This includes on-site releases, etc., as well as transfers off-site. Therefore, the questions above for facilities transferring NPRI substances off-site also apply to receiving facilities.

We addressed these questions through our observations in a series of searches on the NPRI website.

All of this information is essential, not just for concerned community activists and ENGOs, but also for governments, industries, academics, and the media.

Part 5: Facilities that transfer NPRI substances off-site

We were generally pleased with the availability of information transferred off-site on the individual facility reports on the NPRI. For example, on the Lanxess Canada Elmira facility [NPRI ID 2322]:

- It is easy to pull up a table showing transfers by type for all the years of NPRI on one table. The data are there in one place even though the ownership of the facility had gone through a few different changes and names during that period.
- It is easy to scan down the table to see what NPRI substances were transferred and see how it varied over the years.
- It is easy to hit the ID button for the substances that are listed as having been transferred off site. This immediately takes you to a detailed description of each substance. This table shows what the substance is used for in the facility and the quantity of substance transferred off-site by type of facility it was sent to. It also gives the type of emission factor for calculating the amount of each substance and states why the amount of the substance increased or decreased in a specific year. The reason most frequently given is “increases [or decreases] in production levels.”
- For the transfers off-site for each NPRI substance, the report gives amount sent off-site for a different facility and gives the name and address of where the NPRI

substance was sent to and for what purpose. It also gives the type of recycling that it was sent for.

However, there is a serious problem in the reporting system:

- Frequently you can't find the receiving facility using the name given by the reporting company. This is a major frustration and can quickly discourage users from continuing. ECCC has recognized this serious problem and is working to improve it. [See "*Improving the data quality of recipient off-site facilities that are used for disposal or treatment*", Powerpoint Presentation by Jennifer Underhill, Environment and Climate Change Canada, June 2025.] The flaws were "inaccurate addresses", "location not correct", etc. For example, Lanxess gave the address for the receiver's headquarters, instead of the location of the hazardous waste landfill and incinerator that they shipped their materials to at Clean Harbors in Corunna, Ontario.

Recommendation 1A: The drop-down list that ECCC provides for the NPRI reporter (facility) should include the NPRI ID and that ID should show in the facility report that the data user sees. As well as providing the address as NPRI now requires, the facility ID should provide an active link that will take a person to the site that the pollutant was transferred to. The NPRI search function is most reliable if you are just able to put in the NPRI ID number.

Recommendation 1B: Some transfers off-site go outside of Canada. For example, the Metro Vancouver Waste-to-Energy facility (NPRI ID 362) sends copper to Columbia Springs Landfill in Arlington, New York. These reporters should be required to provide the pollutant release and transfers ID of the facility used in the country that the wastes are sent to (provided there is such an ID), not just the address of the receiving facility.

Some additional concerns:

- The substances sent off-site are usually very limited in number. Is this accurate especially for a large chemical manufacturing facility like Lanxess in Elmira? In 2023, they only show three NPRI substances transferred off-site? Is it a threshold issue or is the list of pollutants reported under NPRI not comprehensive enough? It would be useful to do an analysis of other facilities in the same sector to see which substances they are transferring off-site.
- Do spills and cleanups show up? In the Lanxess Elmira case, they show no spills or cleanups in the entire history of the facility. This is so even though Uniroyal, who owned the now Lanxess site in 1998, had a major cleanup involving shipping massive amounts to the hazardous waste landfill and incinerator in the now Clean Harbors facility in Corunna in 1998. Likewise, there is a record of spills at the Elmira facility, but no spills were reported to NPRI.

Remediation:

- There seems to be an ambiguity around the reporting of the transfer of NPRI substances as part of a remediation or clean-up of contaminated soils and groundwater. In the 2025-2027 Guide for Reporting to the NPRI, section 4.3.1 lists information on substances that are being disposed of or sent off-site. The second last item in the list is “site remediation.” In the next section (4.3.2), the reporter is told to give reasons for change in reporting quantities from the previous year. The reporter chooses these from a “pick list.” Site remediation is not included on this pick list.
- On the PFAS guidance for reporting to the National Pollutant Release Inventory (posted April 7, 2026), there is a one paragraph reference in the section on fire fighting foams on “Remediation of contaminated soil/sediment.” There is no reference to remediation in the other parts of the PFAS guidance.
- The recently released “Guidance for wood preservative facilities reporting to the NPRI” has a more extensive section requiring reporting on the release and transfers caused by remedial actions. These are listed as: “disposal of contaminated soils, recovery and treatment of contaminated groundwater, and other one-time, non-routine clean-up.” The section on wastes produced during wood preservative using oil-borne preservatives.

Recommendation 2: The transfers off-site of NPRI substances from remediation activities to other communities can be significant. To improve community right-to-know, NPRI should put more emphasis on ensuring that facilities report such substances in their reporting off-site transfers.

- **A simple first step would be to add “site remediation” to the “pick list” on reasons for changes in transfers. But this is only a beginning.**
- **It is necessary to explore ways to strengthen reporting for site remediation as a component of all Guidances, and**
- **Carry out a survey to determine the extent to which the site remediation should have been used.**

Part 6: Facilities that NPRI substances are transferred to

People living in communities that have facilities to which other NPRI facilities transfer their wastes want to know:

1. Which substances in what quantity and from which facilities are sent to their community? This information is essential for them to assess what threats are being brought to their community.

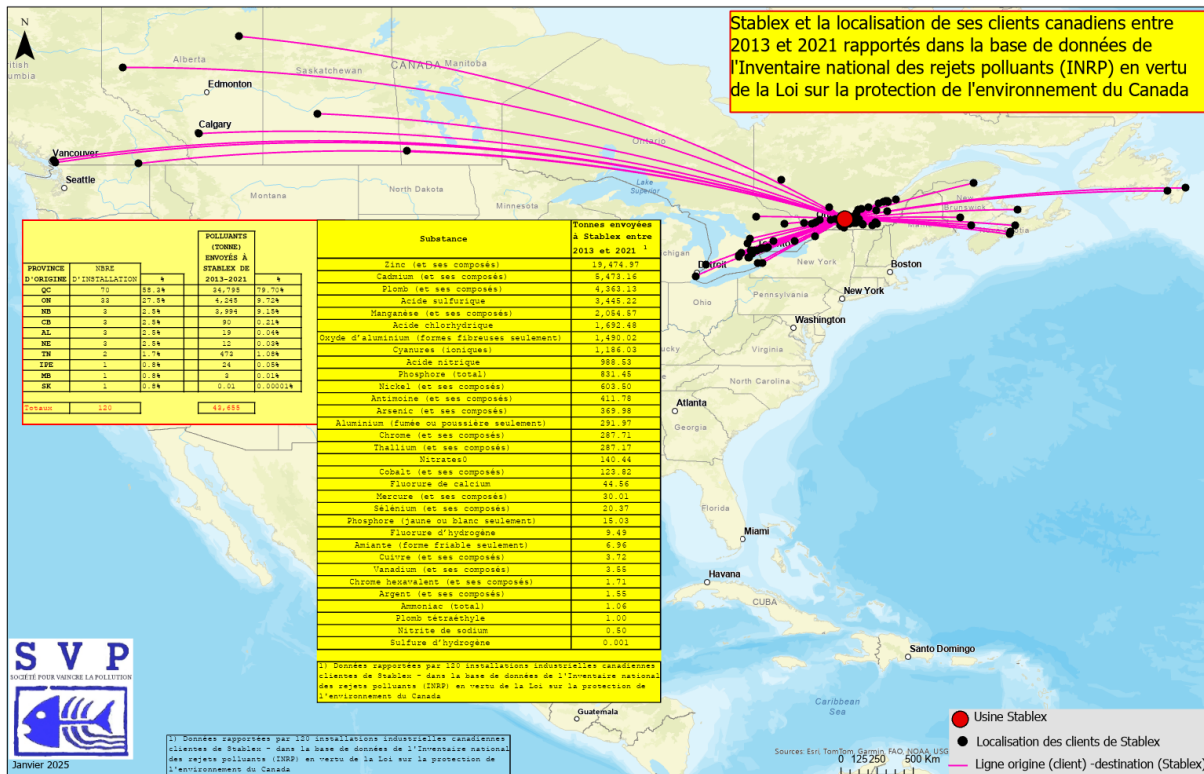
In Part 3 above, we described in detail what should be reported by each transferring facility and how. All components of this should be accessible to a community. This information is in the NPRI database since it is required to be reported.

However, it is virtually impossible to gather this information of the total NPRI substances sent to each receiving facility. For 2024, over 7,000 facilities reported to the NPRI. How can a person find out which of these facilities reported off-site transfers to a particular receiving facility, and gather and compile this information? Does the NPRI have a program that can be used by the public to compile this information? If so, can this tool be further developed and made available to be easily used by a person with average or lesser computer skills, equipment, and programs?

Here is an example of a time that such data was compiled by Société pour vaincre la pollution. They wanted to know what facilities were transferring NPRI substances to Stalex (NPRI ID 5491) – a major waste treatment and disposal facility in Blainville, Quebec, near Montreal. To achieve this, SVP had to have access to ARC-GIS software, and to call an NPRI staff person to get the compilation of facilities for them that shipped to Stalex. They were informed that they had to have access to MS Access database to manipulate the necessary data dump. This is no longer part of the regular MS Office package and requires spending extra money to obtain. Additionally, they need to have the skills and equipment to use these systems. This means that only the exceptional community member would be able to obtain it. They sometimes don't have the electronic access to be able to handle such data. NPRI says that people can contact the NPRI office to get the data. Most people do not feel comfortable making such contact. This is not an acceptable situation for a community right-to-know system, such as the NPRI. In addition, many of the terms used in NPRI are not ones that most people would "intuitively" understand.

After much effort, SVP succeeded in compiling the following map showing Canadian NPRI facilities transferring wastes to Stalex. SVP found that 120 NPRI facilities had sent NPRI pollutants to Stalex. This covered all provinces.

Figure 2: Transfers of NPRI substances to Stablex, prepared by Société pour vaincre la pollution.



Recommendation 3: The public should be able to access data on where and how much pollutants are transferred off-site to the receiving facility near them. In support of Recommendation 1B, the NPRI should develop and share with the public a tool that can be used by the regular person, on a regular computer system to compile and analyse the data for all facilities reporting to the NPRI that sent pollutants off-site to a specific receiving facility (either located in Canada and those outside of Canada).

2. What NPRI substances and in which quantities are released from the receiving facility in their community to air, water, land and disposed of on-site?

The same issues arise here as in all searches for on-site releases and disposal. Prime among these are:

- the challenge of finding the facility report because of name and NPRI ID problems;
- lack of reporting because of inappropriate reporting thresholds;
- exemptions for certain types of polluters;
- substances that aren't on the NPRI list and, therefore, aren't required to be reported; and

- inadequate independent verification of the accuracy of the data provided by the facility.
3. What NPRI substances and in which quantities are transferred from the waste management facility in their community to off-site disposal, treatment prior to final disposal, or recycling?

The same issues arise here as discussed above under *Part 4: Facilities that transfer NPRI substances off-site*.

An additional issue is a limitation in substances transferred off-site from the receiving facility. There is a reasonably detailed report on the different types of recycling system, but the reuse category is absent. Substances sent off-site should specify whether it has been recycled and if so, the quantity recycled and for what purpose. Also, a reuse category should be added. When it is reused, it should also have the data on how much was sent off-site for reuse and the purpose of the reuse. This information is essential because it shows whether the substance has risen in the waste hierarchy and has become a valuable product. Also, the type of reuse or type of recycling should be specified, because the uses can vary dramatically in value. For example, sending waste off-site to be used as a dust control measure on country roads is not value added and may have environmental hazards associated with it. Whereas, cleaning up a solvent through a recycling process so it can be used as a solvent again can be a valuable change.

We have argued elsewhere that a major hole in the current NPRI system is the failure to report the NPRI substances that are sent from the facility in product - *Off-site Transfers of NPRI Substances in Products or as Products*⁹ The off-site transfers of NPRI pollutants will lead to some misleading interpretations if this is not changed.

Recommendation 4: Add a “reuse” category to the transfers off-site category so we can understand what ultimately happened to the NPRI substance. Also, require in the guidance that the purpose for which it is being recycled or reused be provided.

Part 7: The export from and import to Canada of NPRI substances

In order to be responsible international citizens, it is important that we have thorough information on the wastes being exported from Canada and wastes being imported into Canada, for example, under the Basel Convention on exports of hazardous waste. NPRI

⁹ <https://cela.ca/wp-content/uploads/2024/03/Off-site-Transfers-of-NPRI-Substances-in-Products-or-as-Products-dated-October-2022.pdf>

can be an essential tool to help us understand the situation and fulfil our commitments under such international agreements. Throughout this report we have discussed ways in which that reporting can be improved.

A few factors that we need to consider to achieve this is to ensure that we have reports not only on the first place we sent the wastes to outside of Canada, but also whether those wastes were later sent to another destination outside of Canada or as the Commission for Environmental Cooperation (CEC) calls it – “ultimate disposition”. For example, a substance may be sent first to a facility in the U.S. and then the U.S. facility may send some or all of our wastes to another country, such as Mexico. The CEC says that their work “highlights the difficulty of tracking pollutants from their point of origin to their ultimate disposition.”¹⁰

Our searches during this project found several facilities that receive major amounts of NPRI pollutants from outside of Canada – overwhelmingly the U.S. Fonderie Horne [NPRI ID 3623] is a base metal smelter, the largest electronic scrap metals user in North America. We do not know how much comes in from the U.S. One could go through the TRI system to try to track this down, but we run into the same problem as we did in looking for this information for transfers within Canada. There are too many possible facilities that could be shipping NPRI substances to any one facility. The Clean Harbors Canada [NPRI ID 2537] liquid-incinerator and hazardous waste landfill at Corunna, Ontario promotes itself as serving Canadian and U.S. clients, especially within the Great Lakes area, but we don’t have access to the list of facilities shipping NPRI substances to Clean Harbors.

The example of the Horne smelter in Rouyn-Noranda and the CCR refinery in Montreal East that we discussed earlier is a prime example of the lengthy unknown route that the Canadian substances may go through. The trail of some of these substances go from Rouyn to Montreal East and to Stablex in Blainville and a Montreal sewage treatment plant. At each stop in this trail, NPRI data showed that pollutants are being released into each of these communities. But that isn’t the end of the trail. CCR at Montreal East transfers wastes overseas to three communities: Aurubis, in Hamburg, Germany; S&Y in Seoul, South Korea; and Umicore at Antwerp, Belgium. NPRI off-site transfer data show arsenic, cadmium, copper, nickel, and zinc are being sent to these three communities. NPRI pollutants from Canada are inevitably being released into these three overseas communities. And is that the end of the trail or as the CEC calls it the “ultimate disposition?” Not likely. Information on facilities (outside of Canada) receiving pollutants (through waste materials) from Canadian facilities should be accessible through the NPRI.

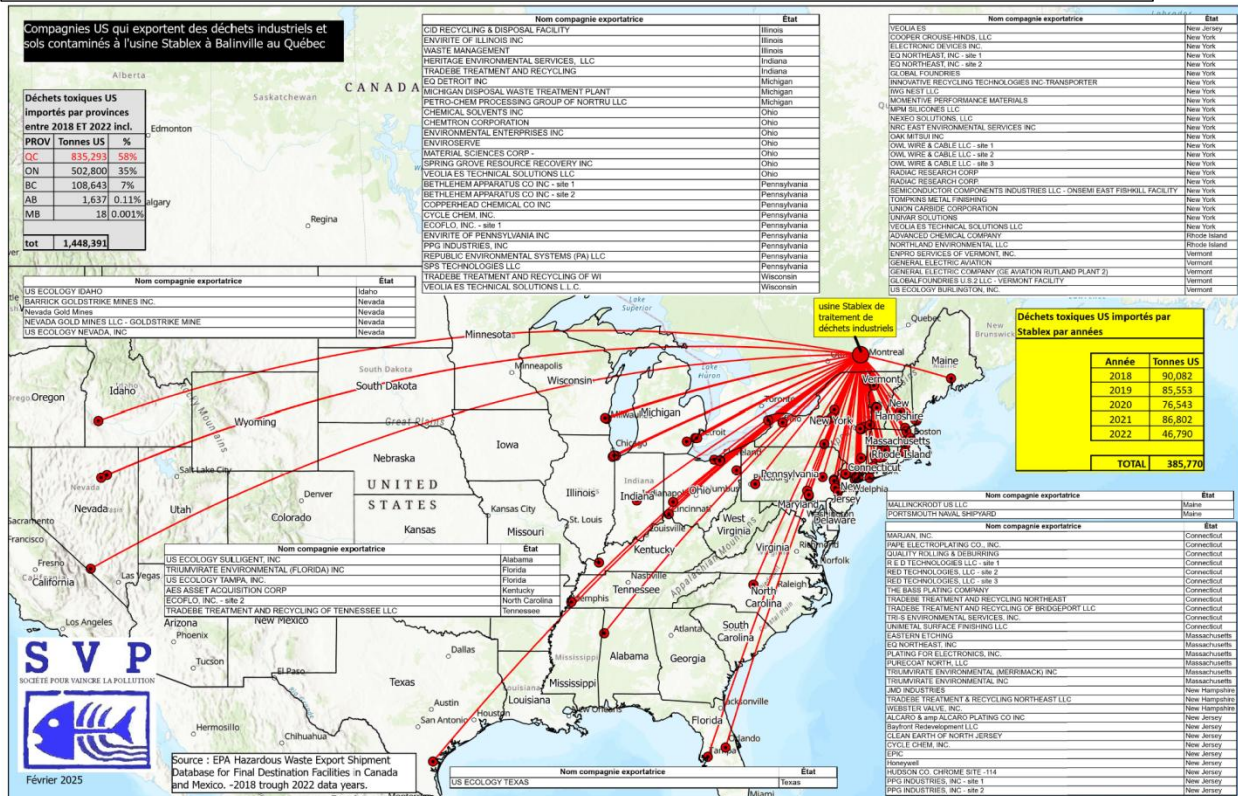
It is easier to get the amounts of hazardous waste or contaminated soils shipped from the U.S. to Canada than it is to get it through the Toxics Release Inventory (TRI). This can be done through the hazardous waste import/export data that is available through the U.S.

¹⁰ “Feature Analysis: Off-site Transfers to Disposal in North America, 2014-2018,” in Taking Stock: North American Pollutant Releases and Transfers, Volume 16, March 2023, p. 128.

RCRA databases. Also, toxic soils are sometimes imported to Canada from the superfund clean-ups in the U.S.

SVP put the following map together showing contaminated soils and hazardous wastes shipped from the U.S. to Stablex. The box on the upper left corner shows the amount of hazardous waste sent to each province from the U.S.

Figure 3: Hazardous Wastes being shipped from the U.S. to Stablex in Canada



The limitation, however, with using the hazardous waste data is that this does not provide data on specific substances in the waste. It may say that certain pollutants are in the waste or soil, but it does not give concentrations or quantities of the toxic substances in it. Further to international obligations under the Basel Convention, to identify substances/pollutants that require prior informed consent and is subject to permit requirements for movement of such pollutants should also be considered relevant information for the NPRI to track in reporting.

Recommendation 5: Canada and the U.S. should come to an agreement to provide each other with more detailed information on pollutants (explicitly require names and quantities) in the waste shipments between the two countries.

Alicia Berthiaume of ECCC presented a powerpoint to the NPRI MSWG meeting in Oct. 2024, entitled “New sustainability viewpoints on Canadian pollutants and their movement in industrial waste.” In that presentation, she presented maps showing “recycling: where from/to? (2013-2021)” among many charts. She concluded that there are uncertainties and limitations in carrying out the analysis. She concluded that “model advancements are needed.”

Recommendation 6: We urge Environment & Climate Change Canada to carry out work to improve the available information on transfers of NPRI pollutants between countries. This could include working with the International PRTR Coordinating Group.

Part 8: Recommendations

As we said at the beginning of Part 3, to assess the adequacy of off-site transfer data for community members to perform the analysis they wish to, we evaluated the NPRI system using the following criteria:

- Is the information easily accessible to the public?
- Is it easy to use the data to carry out analyses and evaluations?
- Is the information detailed enough to be able to understand what is happening?
- Is it easy to carry out cross-searches, e.g., a search for all facilities with off-site transfers for a specific substance?

Our conclusion, as shown by examples in earlier parts of this paper, is that there are serious limitations on all four of these criteria. Therefore, we make the following recommendations:

Recommendation 1A: The drop-down list that ECCC provides for the NPRI reporter (facility) should include the NPRI ID and that ID should show in the facility report that the data user sees. As well as providing the address as NPRI now requires, the facility ID should provide an active link that will take a person to the site that the pollutant was transferred to. The NPRI search function is most reliable if you are just able to put in the NPRI ID number.

Recommendation 1B: Some transfers off-site go outside of Canada. For example, the Metro Vancouver Waste-to-Energy facility (NPRI ID 362) sends copper to Columbia Springs Landfill in Arlington, New York. These reporters should be required to provide the pollutant release and transfers ID of the facility used in the country that the wastes are sent to (provided there is such an ID), not just the address of the receiving facility.

Recommendation 2: The transfers off-site of NPRI substances from remediation activities to other communities can be significant. To improve community right-to-

know, NPRI should put more emphasis on ensuring that facilities report such substances in their reporting off-site transfers.

- A simple first step would be to add “site remediation” to the “pick list” on reasons for changes in transfers. But this is only a beginning.
- It is necessary to explore ways to strengthen reporting for site remediation as a component of all Guidances, and
- Carry out a survey to determine the extent to which the site remediation should have been used.

Recommendation 3: The public should be able to access data on where and how much pollutants are transferred off-site to the receiving facility near them. In support of Recommendation 1B, the NPRI should develop and share with the public a tool that can be used by the regular person, on a regular computer system to compile and analyse the data for all facilities reporting to the NPRI that sent pollutants off-site to a specific receiving facility (either located in Canada and those outside of Canada).

Recommendation 4: Add a “reuse” category to the transfers off-site category so we can understand what ultimately happened to the NPRI substance. Also, require in the guidance that the purpose for which it is being recycled or reused be provided.

Recommendation 5: Canada and the U.S. should come to an agreement to provide each other with more detailed information on pollutants (explicitly require names and quantities) in the waste shipments between the two countries.

Recommendation 6: We urge Environment & Climate Change Canada to carry out work to improve the available information on transfers of NPRI pollutants between countries. This could include working with the International PRTR Coordinating Group.

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Appendix: 2020- 2024; Off site Transfers for Treatment Prior to Final disposal and Off-site Transfers for Recycling, by sector

Sector:

Off-site Disposal, Off-site Transfers for Treatment Prior to Final Disposal, Off-site Transfers for Recycling, by sector 2020-2024

Table 13: Off site Disposal, Off site Transfers for Treatment Prior to Final Disposal, Off site Transfers for Recycling (tonnes), Sector, 2020-2024

Sector	2020	2021	2022	2023	2024	Total
Aluminum	2,654.90	2,347.31	5,937.56	7,498.61	6,252.12	24,690.50
Cement, Lime and Other Non-Metallic Minerals	458.25	395.95	27,282.00	46,904.00	37,529.16	112,569.36
Chemicals	18,540.54	22,653.21	22,538.73	17,845.39	19,089.02	100,666.91
Conventional Oil and Gas extraction	83,937.36	104,240.93	33,383.48	150,974.23	174,260.79	546,796.79
Electricity	5,554.46	4,885.51	4,769.29	3,855.68	3,402.42	22,467.36
Iron and Steel	29,454.95	39,462.08	41,787.35	34,869.69	33,007.10	178,581.18
Metals (Except Aluminum and Iron and Steel)	59,249.60	72,666.18	55,535.45	64,823.80	67,308.66	319,583.70
Mining and Quarrying	1,233.65	1,673.29	5,253.23	3,845.96	5,983.00	17,989.13
Non-Conventional Oil Extraction (including Oilsands and Heavy Oil)	25,135.99	12,969.24	15,248.55	14,887.07	13,551.53	81,792.38
Oil and Gas Pipelines and Storage	16,346.96	15,381.87	12,135.17	11,634.17	12,644.96	68,143.13
Other (Except Manufacturing)	14,331.16	8,114.85	11,263.93	11,412.73	23,294.23	68,416.89
Other Manufacturing	31,361.81	32,342.77	31,614.67	31,882.36	32,566.81	159,768.42
Petroleum and Coal Product Refining and Mfg.	114,546.81	115,498.72	117,121.00	145,134.61	128,358.24	620,659.38
Plastics and Rubber	892.82	1,170.39	874.45	915.40	921.49	4,774.54
Pulp and Paper	3,581.47	2,496.91	3,096.53	2,989.20	2,805.46	14,969.57
Transportation Equipment Mfg.	15,465.62	12,071.98	13,531.67	13,505.32	15,126.04	69,700.62
Waste Treatment and Disposal	52,647.76	47,060.02	38,217.40	37,825.46	107,184.72	282,935.36
Water and Wastewater Systems	22,885.74	22,756.54	25,310.22	25,346.47	27,679.72	123,978.68
Wood Products	391.43	417.15	356.12	309.36	319.84	1,793.91
Total	498,671.30	518,604.90	465,256.79	626,459.51	711,285.31	2,820,277.82

Source: NPRI, Dashboard, April 9, 2026

Examples of sectors increasing (Sum of Off-site Disposal, Off-site Transfers for Treatment Prior to Final Disposal and Off-site Disposal for Recycling) between 2020 and 2024

- Conventional oil and gas: 83,937 tonnes (2020) and 174,261 tonnes (2024) - 108%
- Waste Treatment and Disposal: 52,648 tonnes (2020) and 107,185 tonnes (2024) – increase by 104%
- Cement Lime and other non metallic minerals: 485 tonnes (2020) and 37,529 tonnes (2024) - increase by 7,638%
- Other except manufacturing: 14,331 tonnes (2020) and 23,294 tonnes (2024 – increase by 62%

- Water and wastewater systems: 22,886 tonnes (2020) and 27,680 tonnes (2024) – increase by 21%
- Metals (except aluminum and iron and steel): 49,250 tonnes (2020) and 67,309 tonnes (2024) – increase by 37%

Examples of Sectors with decreasing or unchanged (Sum of Off-site Disposal, Off-site Transfer for Treatment Prior to Final Disposal and Off-site Transfer for Recycling) between 2020 and 2025

- Electricity: 5,554 (2020) and 3,402 (2024) – decrease by 39%
- Non-conventional Oil Extraction (including Oil Sands and Heavy Oils): 25,136 tonnes (2020) and 13,552 tonnes (2024) – decrease by 46%
- Oil and Gas Pipeline and Storage: 16,347 tonnes (2020) and 12,645 tonnes (2024) – decrease by 23%
- Pulp and paper: 3,581 tonnes (2020) and 2,805 tonnes (2024) – decrease by 22%
- Wood Products: 391 tonnes (2020) and 320 tonnes (2024) – decrease by 18%