

Delegation Presentation To Regional Council – October 10, 2007

By Wendy Bracken

Good morning Mr.Chairman, Councillors, Staff, and Members of the Public.

I would like to start by addressing the new report produced by the consultants GENIVAR and Jacques Whitford on Step 7 and the identification of their preferred site. At the last Regional Council meeting I pointed out that there were 7 missing reports that Stephen Rowe, the peer review consultant hired by Clarington, had identified as important and necessary for both Clarington and the public to review and comment on prior to the consultants deciding on a preferred site. Those reports (which were originally promised for July) were not released, so there was no Clarington input nor any public input on them, and the consultants went ahead without, obviously, any comments on those reports from Clarington or the public and made their decision on the preferred site. This is an error in this Environmental Assessment process. This Council was made aware of the problem as it was raised at the last meeting and Clarington's own Regional representatives were very aware of the missing reports and the motion that had come out of Clarington Council requesting them and yet not a word was said by our representatives.

I attended the Joint Waste Management Group meeting where the consultants presented the Preferred Site report. At first glance, for most perhaps, it looks professional, neat and tidy with nice looking charts. When you really digest the CONTENT of it, though, you may discover, as I did, how incredibly subjective this report is, how void of meaningful analysis it is (both quantitative and qualitative), and how things that are very important, especially to health and environment, were completely omitted.

We know that health and environmental concerns are paramount and should be given the greatest consideration when determining the preferred site. We know that of all the residual waste alternatives available this Council has selected thermal treatment which has been identified as the alternative with the GREATEST IMPACT ON OUR AIR SHED. Impact on air quality, therefore, should have been given the greatest consideration, the heaviest weighting. If you look at Table 4.1 in the report you will see that overall Clarington 01 is identified as being NEUTRAL as far as potential air quality impacts. We as residents ask how could it possibly get that rating. We know that the air quality is already poor in Courtice, Bowmanville and Newcastle. Dr. Debra Jefferson has told both Councils air quality is a big concern. We have the second highest rate of asthma in the province. The Ontario Medical Association, in their 2005 report entitled "Illness Costs of Air Pollution", estimated that, in 2005, Durham Region had 210 premature deaths due to air pollution with 2,420 emergency visits resulting in 690 hospital admissions, all with a total health care cost of over 23 MILLION dollars. Those numbers were lower than Halton's and we know how concerned their Medical Officer of Health was about adding to the burden in their air shed. We have the prevailing westerlies bringing the smog our way from Toronto and all points west, we have the 401 and soon will have the 407, we have the major polluter St. Mary's cement with its well known plume of brown haze hanging over us and we have a landform which acts like a basin and holds the smog in. I have talked to many, many residents who tell me they or their children never had asthma or breathing problems before they moved to Newcastle. The report acknowledges the 401 and industrial emissions and the potential adverse impact from lake effect and labels the Courtice site 01 as DISADVANTAGED on the meteorological conditions. The report then makes a very unsupported "calculation". Under the indicator which calculates truck haulage travelled per day, it rates Courtice 01 as being ADVANTAGED in that it had the lowest km hauled per day. It then seems to assume that these two indicators are somehow additive, and takes the DISADVANTAGE label and ADVANTAGE label, puts them together and comes out with NEUTRAL. These two factors are absolutely NOT ADDITIVE. The truck haulage to the facility when you look at just the particular site (and not overall for the two Regions) will only mean more emissions load on that site and could only make it more disadvantaged. The overall impact on the broader scope needs a separate analysis. Any reasonable person can see that it is inappropriate to label Courtice 01 as NEUTRAL when it comes to air quality impacts.

Equally disturbing, is the analysis on water quality impacts, also in Table 4.1. Despite the fact that Courtice 01 is right beside the huge body of Lake Ontario, the source of drinking water for millions of people and habitat for many species, remarkably it is labeled as the site with ADVANTAGE with respect to water quality impacts. East Gwilliambury in York, however, because of its very small watercourse which Jim McKay told JWMG is dry most of the year, has been labelled as the DISADVANTAGED site for water quality impacts. At the Public Information Session on this report held in Bowmanville, I asked both Jim McKay and David Merriman, if the fallout of the emissions onto Lake Ontario was addressed in this report. I was stunned when they told me that the effect of the fallout on Lake Ontario was not considered since it was not identified as a health concern in the Generic Human Health and Ecological Risk Assessment. This is a MAJOR OMISSION. It completely disregards the many studies that have been done on the matter which document the widespread fallout of many airborne pollutants, particularly those associated with incinerators, onto Lake Ontario and how they have poisoned and degraded it. You were given the well known scientific paper "Dioxin Fallout In the Great Lakes" which studies in detail the great problem of airborne dioxin fallout and in that paper Dr. Barry Commoner also discusses the problem of risk assessments which often only look at the impacts of a single facility in a very small area. His paper says the following:

And it is sometimes argued that since the output of dioxin from any one source does not add significantly to the background level, it can be "safely" operated. We now know that the chief contribution of each source to the hazard of airborne dioxin is, in fact, made by adding to the general level of background dioxin – the widespread fallout-and that this dangerous impact on the food supply is not "natural" but man-made.

Another major omission is the failure to address the problem of that fallout as it pertains to fish wildlife. Again, remarkably, under the indicator which includes impact on fish habitat, Courtice 01 is identified as being an ADVANTAGED site because there is "no aquatic habitat on-site". This label comes in spite of the fact that Lake Ontario, habitat for many, many aquatic species, is right beside the site. This label is used in spite of the numerous studies on the problem of the contamination of Lake Ontario fish by heavy metals like mercury, and by dioxins and furans. Fisheries agencies warn pregnant women not to eat fish caught from the Lake and others are severely restricted on their yearly intake. A very recent study aptly titled "Up To The Gills" (I believe it was commissioned by Ontario Waterkeeper) states the disturbing trend that dioxin levels are once again on the increase. Does it make any sense to add another source of heavy metals and organic pollutants which include deadly dioxins/furans to our waterfront? Is it acceptable these facts were omitted in the consideration of the preferred site?

On September 27, the Health and Social Services Committee was presented a petition signed by 43 Durham Region doctors. Concerns about this facility being a major source of criteria air pollutants and particulate matter as well as producing toxins which will deposit onto our land and water and contaminate our food supply were articulated. The petition states "Epidemiological evidence clearly shows an association between combustion-related pollutants and adverse effects on human health." The petition urged the Region to explore alternatives for residual waste treatment that **do not include thermal treatment**. Our doctors are on the frontlines everyday and they understand the health of the patients of this Region. This petition deserves the greatest attention of this Council.

Another very concerning fact about our risk assessment and the preferred site selection is that when assessing various criteria, the authors take a very small radius of 1-2 km from the stack. Does that seem reasonable for such a facility with a high stack? Many scientists say that is far too narrow a scope. Dr. David Pengelly, in his review of the Halton document, states that typically emissions from an individual stack have their greatest impact locally within 1 to 20 kilometres. There is a large Clarington and Oshawa population that falls within a circle with a 20 km radius from the incinerator. Kristin McKinnon Rutherford recently identified a large number of schools within a 10 km radius, with some

only 3 km away. On the much broader scale, all health and environmental assessments should include how adding another major point source of combustion-related pollutants, particulates, and toxins adds to the further degradation of air, water and food quality in our region, our province, our country and our planet.

It is time for you, our elected Regional representatives to ask tough questions about the quality of the information you have been receiving and most importantly to ask about the things you were not told about– the information that was omitted and the information that has not been flagged for you when it is pertinent to the study. The Generic Health and Ecological Risk Assessment did not discuss nor even mention toxic nanoparticles, complex mixtures, and the impact an incinerator would have on global warming, although these are well known and intractable problems for incinerators. It did not provide a thorough discussion of the weakness in Ontario standards and guidelines and the lax monitoring practices. Important studies on the health and environmental effects of incinerators have not been flagged for you or the public. Many, many questions need to be asked. And I will end with this one for you. Is it acceptable that you will be asked to vote in December whether or not you accept Clarington 01 as the preferred site without the site specific studies being complete?

(Barry Bracken asked these questions at the end of his presentation on the same date.)

Here are some of the many questions for our Regional Councillors:

1. Did the consultants and all those involved provide a sufficient level of detail of information prior to the vote in June 2006 on all of the different alternatives? Were the health effects of incineration clearly explained to all before the vote which resulted in the selection of thermal treatment?
2. Is it acceptable that the Generic Risk Assessment failed to even mention the issue of toxic nanoparticulate and unidentified complex mixture emissions even though it is the well known intractable issue for incineration?
3. Is it acceptable that the Ecological Risk Assessment did not mention or analyze the issue of global warming and how this facility would impact climate change?
4. Do you feel it is appropriate to rely solely on risk assessment although there are many weaknesses in this method and its accuracy can be very low?
5. Do you feel it is appropriate to dismiss all of the epidemiological studies when they fall slightly short of being conclusive on proving cause and effect? When large studies have shown higher rates of adult and childhood cancer and also birth defects around municipal waste incinerators with the results consistent with the associations being causal, don't you think these studies should have been brought to your attention, flagged and weighed into the consideration of health effects? When the recent literature on particulate and gaseous combustion-related pollutants demonstrate clear associations with adverse health effects, shouldn't those studies also have been highlighted to you?
6. Would a thorough analysis of Ontario standards and guidelines and identification of those standards which are weak (or completely missing) be helpful? Dr. Pengelly did so for Halton.