

Memo to the Minister of the Environment and Climate Change:

Dear Minister Murray:

The residents of Port Hope, Ontario, recently won a heroic battle to prevent a major potential source of pollution, an incinerator, being constructed in our idyllic, historic, rural community. The heroes of this battle were the members of a grass-roots group of concerned citizens. I volunteered as medical and scientific advisor to this group.

This battle was won at a high cost of many hundreds of person hours of very hard work and much significant stress. We, the environmentally concerned citizens, found ourselves battling not only a corrupt potential polluter of our environment, but also the entangled web of bureaucracy of government agencies at various levels, including that of the Ministry of the Environment and Climate Change.

I realise, of course, that your Ministry's regulations were put in place before your time as Minister, and that it can not be expected that you should be familiar with all the details of these regulations. It is for this reason that I here respectfully bring to your attention that the existing structure of the bureaucracy functions in effect as a support system for the potential polluter, and as an almost insuperable obstruction for concerned citizens who attempt to uphold your Ministry's admirable declared objectives to protect the environment.

I respectfully submit below a Statement in which I document the issues mentioned above, **and, in green text, I make the case for positive changes which I respectfully request that the MOECC consider implementing. These include replacing a tradition of pollution that has stigmatised Port Hope in the past, with a new image as a Centre of Excellence in Environmental Recycling, including development of core recycling industries and a School of Recycling Sciences.**

I urge you to read what follows carefully and in its entirety, as its message goes to the essence of your Ministry's role, and I appeal to you to take the necessary steps to remediate the problems I identify.

I respectfully request the opportunity to meet with you to further clarify the medical and scientific concerns for the environment that I have expressed in this Statement.

Your sincerely,

Dr. Stan R. Blecher MD, FCCMG (Fellow of the Canadian College of Medical Geneticists)  
Port Hope  
7 September, 2015

To:

Minister of the Environment and Climate Change Glen Murray <[gmurray.mpp@liberal.ola.org](mailto:gmurray.mpp@liberal.ola.org)>

c.c.

Premier Kathleen Wynne <[premier@ontario.ca](mailto:premier@ontario.ca)>;

Minister of Energy Bob Chiarelli <[bchiarelli.mpp.co@liberal.ola.org](mailto:bchiarelli.mpp.co@liberal.ola.org)>;

Minister of Health and Long Term Care Eric Hoskins <[ccu.moh@ontario.ca](mailto:ccu.moh@ontario.ca)>;

Minister of Municipal Affairs and Housing Ted McMeekin <[minister.mah@ontario.ca](mailto:minister.mah@ontario.ca)>;

Minister of Agriculture, Food and Rural Affairs Jeff Leal <[minister.mra@ontario.ca](mailto:minister.mra@ontario.ca)>;

MPH Councillors: Mayor Bob Sanderson <[mayor@porthope.ca](mailto:mayor@porthope.ca)>; Deputy Mayor Greg Burns <[gburns@porthope.ca](mailto:gburns@porthope.ca)>; Councillor L. Andrews <[landrews@porthope.ca](mailto:landrews@porthope.ca)>; Counsellor L. Ferrie-Blecher <[lferrie-blecher@porthope.ca](mailto:lferrie-blecher@porthope.ca)>; Councillor T. Hickey <[thickey@porthope.ca](mailto:thickey@porthope.ca)>; Councillor J. Lees <[jlees@porthope.ca](mailto:jlees@porthope.ca)>; Councillor R. Polutnik <[rpolutnik@porthope.ca](mailto:rpolutnik@porthope.ca)>

Northumberland County Councillors: <[coombsm@northumberlandcounty.ca](mailto:coombsm@northumberlandcounty.ca)>; <[BrocanierG@northumberlandcounty.ca](mailto:BrocanierG@northumberlandcounty.ca)>; <[LogelJ@northumberlandcounty.ca](mailto:LogelJ@northumberlandcounty.ca)>; <[WalasM@northumberlandcounty.ca](mailto:WalasM@northumberlandcounty.ca)>; <[lovshinm@northumberlandcounty.ca](mailto:lovshinm@northumberlandcounty.ca)>; <[sandersonb@northumberlandcounty.ca](mailto:sandersonb@northumberlandcounty.ca)>; <[Macmillanh@northumberlandcounty.ca](mailto:Macmillanh@northumberlandcounty.ca)>

Lou Rinaldi, MPP Northumberland-Quinte West <[lrinaldi.mpp.co@liberal.ola.org](mailto:lrinaldi.mpp.co@liberal.ola.org)>

Dr. Lynn Noseworthy, Medical officer of Health, Haliburton, Kawartha, Pine Ridge District Health Unit <[info@hkpr.on.ca](mailto:info@hkpr.on.ca)>; <[ctremblay@hkpr.on.ca](mailto:ctremblay@hkpr.on.ca)>

Federal Minister of the Environment and Climate Change Catherine McKenna <[Catherine.McKenna@parl.gc.ca](mailto:Catherine.McKenna@parl.gc.ca)>

Kim Rudd, MP Northumberland-Peterborough South <[info@kimrudd.ca](mailto:info@kimrudd.ca)> <[kimrudd.liberal.ca](mailto:kimrudd.liberal.ca)> <[kim.rudd@eagle.ca](mailto:kim.rudd@eagle.ca)>

Liz Benneian, Ontario Zero Waste Coalition <[lizcdn@yahoo.com](mailto:lizcdn@yahoo.com)>

Linda Gasser <[gasserlinda@gmail.com](mailto:gasserlinda@gmail.com)>

Ontario Ministry of the Environment and Climate Change:

Chief of Staff to Minister of the Environment Moira McIntyre <[Moira.McIntyre@ontario.ca](mailto:Moira.McIntyre@ontario.ca)>

Director, Environmental Assessment and Approvals Branch, Ministry of the Environment Agatha Garcia-Wright <[agatha.garciawright@ontario.ca](mailto:agatha.garciawright@ontario.ca)>

Senior Policy Advisor Greg Seniuk <[greg.seniuk@ontario.ca](mailto:greg.seniuk@ontario.ca)>

Solange Desautels <[Solange.Desautels@ontario.ca](mailto:Solange.Desautels@ontario.ca)>

Ross Lashbrook <[Ross.Lashbrook@ontario.ca](mailto:Ross.Lashbrook@ontario.ca)>

Dawnett Allen <[Dawnett.Allen@ontario.ca](mailto:Dawnett.Allen@ontario.ca)>

Hollee Kew <[Hollee.Kew@ontario.ca](mailto:Hollee.Kew@ontario.ca)>

Executive Director of Policy, Office of the Premier: Karim Bardeesy <[Karim.Bardeesy@ontario.ca](mailto:Karim.Bardeesy@ontario.ca)>

## **Ministry of the Environment and Climate Change Procedures Favour Polluters: A Plea for Change**

Statement by Dr. Stan R. Blecher MD, FCCMG

### **SUMMARY**

The MOECC's Web-site contains powerful statements about environmental protection of air quality, but the Ministry's practice does not live up to its noble stated intentions. In the paradigm case described below, in which an incinerator company targeted the Municipality of Port Hope (MPH), repeated examples came to light of how MOECC Regulations explicitly favour the polluter rather than concerned citizens opposed to the pollution. The MOECC's basic position in such cases is that the process is Proponent driven. This starting point provides a framework within which a polluting industry is able to get away with egregious dishonesty and misuse of privilege.

The Company was allowed to employ and pay a non-independent agent to perform a so-called Environmental Screening Process (ESP). The resulting Environmental Screening Report (ESR), and in particular the section entitled Human Health Risk Evaluation (HHRE) was, not unexpectedly, profoundly flawed and biased. A so-called "Peer Review" of the ESR including the HHRE was done by another non-independent company, again paid by the incinerator company, and, again unsurprisingly, the "Peer Review" was characterised by errors and bias.

A more complete Human Health and Ecological Risk Assessment (HHERA) was requested by the local Medical Officer of Health, but again the incinerator company was allowed to employ and pay the same non-independent company to do the HHERA as had done the ESR including HHRE. The HHERA was not produced by the date it was due; indefinite extensions were granted by the MOECC. Submissions from citizens in opposition to the incinerator had the same deadline, but no extensions were given to citizens. The Proponent incinerator company repeatedly put out false information in its promotional material, in statements to the MOECC and to the MPH, in public and press releases, and even in a formal statement to a House of Commons Standing Committee. The MOECC was repeatedly informed that the Proponent had been promoting falsity, but no action appeared to be taken.

This attempt by a polluting industry to impose its activities on an unwilling citizenry and municipality was defeated through a grass roots effort by citizens, but at the cost of hundreds of person-hours of citizens' hard work and much stress.

### **Plea for change:**

The kind of situation experienced during our battle against the incinerator could be avoided if the MOECC were to ensure protection of the environment and the public by **passing legislation making incinerators and similarly polluting industrial activities illegal.**

The Ministry's policy on so-called "Guidelines" for allowable amounts of pollution by cancer- and other disease-causing poisons also requires revision to accord with modern scientific information. **It is now known that there is no safe limit for cancer-producing molecules, and accordingly we propose that the "limits" should in general be zero. This should include the emission of nanoparticles, heretofore not restricted by any legislation.** In the interim, while allowable "limits" or "guidelines" do currently exist, these should be enforced, with **ongoing monitoring of emissions by plants and, in the event of infractions, appropriate correctional measures including close-down of facilities. We propose that existing plants such as cement kilns should not be granted permission to incinerate waste and thus increase their emissions while preventing establishment of recycling programmes.**

**Port Hope has been the unwilling victim of environmental pollution since the era of the Eldorado radium and uranium plants. The attempt to place a polluting incinerator in our municipality was successfully deflected by people power. A fitting future goal, and one appropriate for MOECC support, would be the development in Port Hope of a Centre of Excellence for development of Environmental Recycling Industries, and a School of Recycling Sciences.**

## PREAMBLE

The Ministry of the Environment and Climate Change (MOECC) Web-site states: **The quality of our air directly impacts our health and the natural environment, so we want our air to be as clean as possible. The Ministry of the Environment works to protect and improve air quality.**

**This is an admirable and praiseworthy mission statement. It is curious, in light of this, that MOECC rules and regulations, procedures, staff interpretations of the regulations, and the resulting bureaucratic practice, all appear to strongly favour polluters, and appear to place obstacles in the way of concerned citizens who attempt to support and promote the Ministry's stated objectives of protecting and improving air quality.**

This conclusion emerges from experience in having battled against a major threat of serious pollution of the atmosphere and the environment that was created by the efforts of the incinerator company ENTECH-REM to force its incinerator on an unwilling host, the citizenry of the Municipality of Port Hope (MPH). In the following I use this battle as the paradigm to document the statement above, concerning MOECC procedures. **The objective of this exercise is to bring this situation to the attention of the decision makers in the MOECC, and to provide information that might help the MOECC make positive changes in the system.**

The battle I refer to was waged against the potential polluter, ENTECH-REM, by an incorporated, voluntary, grass-roots organisation of concerned citizens, the Port Hope Residents 4 Managing Waste Responsibly (PHR4MWR). This small group of citizens worked with a bare minimum of financial resources, derived from small personal contributions by members, battling the substantial financial might of a well-established industrial company.

I volunteered as medical and scientific consultant to PHR4MWR. PHR4MWR was initially formed to oppose ENTECH-REM, but it soon found itself having to also confront various official and quasi-official agencies supporting ENTECH-REM, including the then Mayor of MPH, most of the then incumbent Councillors (with one vocal exception - Councillor Greg Burns), ENTECH-REM's paid support companies Conestoga Rovers and Associates (CRA) and Hardy Stevenson and Associates (HSA) and, most significantly, the above-mentioned procedures of the then Ministry of the Environment (MOE), now renamed the MOECC.

I list and discuss below, in 13 sections, some of the important MOECC-based issues which constituted obstacles in the battle against ENTECH-REM, and which cause ongoing concern for the future. By MOECC-based I mean issues that directly arose or now arise from MOECC regulations, or issues that affected or still affect the course of events through official authorisation by MOECC or through apparent tacit acceptance by MOECC staff. **In various of the sections of this document I respectfully suggest solutions to the perceived problems that could be implemented by the MOECC, and in Section 13 I make a specific proposal of how the Municipality of Port Hope's historical pollution image could be turned around to create a positive example of environmentally sound management of waste issues for the rest of Ontario.**

## 1. MOECC REGULATIONS FOR THE ENVIRONMENTAL SCREENING PROCESS FAVOUR THE POLLUTER

Right up front, the concerned citizen is confronted with the statement, in MOECC documents, that **the Ministry's Environmental Screening Process (ESP) is a Proponent-driven process.**

This immediately sets the stage for what one as a concerned citizen will come to experience: **that the default position adopted by the MOECC is evidently that the Proponent is right; is telling the truth; is providing reliable information; is responsible and trustworthy; has the requisite expertise to carry out the project it proposes; and has the requisite expertise and integrity to correctly and honestly answer all questions and challenges from concerned citizens.**

**The fact that the process is Proponent driven ALLOWS THE PROPONENT TO CHOOSE, EMPLOY AND PAY ITS OWN EVALUATOR TO PREPARE ITS OWN ENVIRONMENTAL SCREENING REPORT, THEREWITH ALLOWING THAT THE PROCESS IS NEITHER OPEN NOR INDEPENDENT, NOR THAT TRUE SCIENTIFIC EXPERTISE WILL NECESSARILY COME TO BEAR. The default assumption appears to be that the Proponent's proposal WILL, AFTER THE ESP HAS RUN ITS COURSE, ULTIMATELY BE APPROVED, albeit possibly with minor restrictions or modifications, thus completing a self-fulfilling prophecy.**

**In keeping with the statement from the MOECC that the process is Proponent driven, the public is informed that citizens who may have any concerns about the Proponent's proposal are required in the first instance to contact the Proponent, in an attempt to resolve any such concerns.**

Applying this to the paradigm case of the proposed ENTECH-REM Port Hope incinerator, the problematic nature of this requirement is immediately evident: The Proponent wishes to construct a plant that would pour out into the atmosphere deadly poisons, which would potentially bio-accumulate in unlimited quantities. Concerned citizens object to the fact that this possibility is even allowed under existing legislation, and accordingly **have only one thing to say to the Proponent: Go Away.** It could be predicted, and experience confirmed, that **when the concerned citizens dutifully attempted to "contact the Proponent" with this statement, it failed to "resolve any concerns".**

Despite this, members of PHR4MWR conformed to the MOECC requirements and consistently contacted the Proponent with concerns and numerous questions, but these approaches were regularly ignored by the Company. Nevertheless the Company evidently gave MOECC the impression that it was responding to these approaches. MOECC appeared to accept these assurances without any documentation. The concerned citizens of PHR4MWR were unable to find any stipulations in the MOECC regulations that actually required the Proponent to take any cognisance of the concerns brought to it by concerned citizens.

As mentioned, MOECC regulations require concerned citizens to NOT contact the MOECC without having first contacted the Proponent. However, if citizens nevertheless, after having conformed with this requirement, still do wish to contact the MOECC, they are required to copy to the Proponent any comments, information or material that they send to the MOECC. The Proponent is to be informed of any contact between a concerned citizen and the MOECC, and is to be briefed on the submission of any material to the MOECC. **But the Proponent is NOT required to inform the concerned citizens of any response that they (the Proponent) may make to the MOECC, or any correspondence they may have with the MOECC, nor will the MOECC copy any such information to the concerned citizens.**

**Similarly, any person or agency who may be acting in support of or lobbying for or promoting the case of the Proponent *vis-à-vis* the MOECC is likewise evidently under no obligation to make such activities known to concerned citizens or the public. In our paradigm case, for example, we ascertained through**

**Freedom of Information (FOI) Requests that the then Mayor of Port Hope, Ms. Linda Thompson, was covertly lobbying in support of the Proponent, in writing and in at least one meeting with MOECC officials, while holding this activity secret from the citizens of Port Hope and publicly claiming that she was remaining neutral. This appears to have been within MOECC rules and regulations, as it evidently elicited no negative response from the MOECC.**

**I respectfully submit that removal of the concept "Proponent driven" from MOECC procedures for the Environmental Screening Process (ESP) would go a long way to resolving many if not most of the issues that I bring to your attention in this document. In our case, our grass-roots movement was powered entirely by hard-working citizens, with virtually no financial resources, using their "spare time" to oppose a well-funded polluting company in a David-and-Goliath battle, in which Goliath appeared to be supported by government agencies. In the sections that follow I indicate specifically how removal of the "Proponent driven" status of the ESP could improve the process.**

## **2. ENVIRONMENTAL SCREENING REPORT**

Conestoga Rovers and Associates (CRA) is a private company that was hired by ENTECH-REM to prepare the **Environmental Screening Report (ESR)** that was required by MOECC regulations. The ESR prepared by CRA included a so-called **Human Health Risk Evaluation (HHRE)**, though ENTECH-REM, through CRA, stated that this had not been required by the MOECC regulations. Subsequently, the same company, CRA, was employed by ENTECH-REM to prepare a Human Health and Ecological Risk Assessment (HHERA) that was requested by the local Medical Officer of Health (MOH). There are several concerns about these occurrences. [The HHERA document never materialised - see below].

The concerns with the above are as follows:

a) CRA was **selected by** and **paid by ENTECH-REM** to do the ESR including HHRE, and the requested HHERA; this alone disqualified any report by CRA on ENTECH-REM's then proposed incinerator from being perceived as being unbiased and independent.

b) As it transpired (see below), the HHRE contained in the ESR was shown, in a Review done by me, to be replete with scientific errors and misunderstandings. It was apparent that CRA did not possess, or at least did not apply to the preparation of this document, any appropriate scientific expertise. See below for further details on the HHRE and my Review of it.

c) ENTECH-REM again employed CRA to prepare a HHERA, even though it had been shown in my Review that CRA was not qualified to prepare such a document.

e) In preparing a HHERA, CRA would have been in effect also evaluating their own previously written and previously debunked HHRE. From an ethical viewpoint, CRA should have for this reason, even if not for the other reasons already mentioned, recused itself from preparation of a HHERA.

**Because of the above points a) - e), it is puzzling that MOECC appears to have tacitly approved ENTECH-REM's employment of CRA for the stated purposes, and to have tacitly accepted that material prepared by CRA would be admissible for the purposes of the Proponent's ESP.**

**As mentioned above, removal of the "Proponent driven" status of the Environmental Screening Process would improve the process. I respectfully submit that the Proponent should not itself select the agency that will manage the ESP. Instead, the MOECC could, without any input from the Proponent, select an agency, for example a Department of Environmental Sciences in a prestigious university, that is independent and has personnel with the prerequisite expertise, and where necessary could additionally sub-contract further experts. Of course the Proponent would pay the entire cost of the process, but as**

mentioned would not have any say in choice of the agency or people that would do the work. The same process and criteria should be applied to appointment of a "Peer Review" agency to offer a second opinion. Re "Peer Review", please see Section 4. "PEER REVIEW", below.

### 3. THE ORIGINAL HUMAN HEALTH RISK EVALUATION (HHRE) IN THE ENVIRONMENTAL SCREENING REPORT (ESR)

As mentioned above, the ESR contained a so-called HHRE. I wrote a Review of the HHRE. My full Review can be found at the PHR4MWR Web-site, [www.phr4mwr.ca](http://www.phr4mwr.ca). Some of the following comments are in part cited from my Review.

The ESR HHRE was a meagre and inadequate document that was rife with factual error, scientific misunderstanding, flawed methodology and false conclusions. It provided very scant documentation by way of references (in total 4 footnotes), none of which are from the peer reviewed scientific literature. In my Review I refuted claims made in the ESR HHRE, and I documented all of my statements with, in all, over 60 references, including over 45 articles from the peer reviewed literature.

The HHRE purported to predict the concentration of toxic emissions at "Point of Impingement". For any such prediction it is necessary to know what the concentration of actual emissions would be, but, as I document extensively in my review, ENTECH-REM had no data from past experience to draw on: its claim of a relevant track record was false. (The rather intriguing issue of how the Company falsified its track record is described below - see section 6. **ENTECH-REM MISLED THE DECISION MAKERS WITH FALSIFICATIONS**). "Modelling", the use of abstract numbers to make calculations, is, as I also document, notoriously unreliable. However, in listing purported "Total Facility Emission Rates" the HHRE did not even provide "modelling" information to explain how these figures were derived. Thus, for the only really important data relating to "risk assessment", namely emission rates, the HHRE's claims were based on entirely fictitious figures.

The scientific literature indicates that incinerators may produce at least 250 toxic chemical emissions. In listing expected emissions from the proposed ENTECH-REM incinerator, the HHRE admitted to only 18. Of the 18 named noxious chemicals that the HHRE listed as possible emissions, it **falsely declared only 4 of those to be carcinogenic (cancer producing)**. However, as I documented in detail, with scientific references, **in fact 16 of the 18 are carcinogens**. The HHRE **falsely declared that the 4 they admitted to being carcinogens would be present in "air concentrations that are protective of a cancer risk level"**. **Carcinogens can not be "protective" of cancer risk, at any concentration**. The author(s) was or were evidently unaware of the fact, or they knowingly failed to state, that cancers are the result of genetic mutations, and that **there is no level of a mutation-causing and cancer-causing poison that is safe**. Furthermore, the document makes no mention of the lethal nanoparticles that this incinerator would emit, and no mention of the accumulation of emitted toxins in the food chain.

Unsurprisingly, for a document paid for by the Company, the HHRE concluded that if an incinerator were to be built by ENTECH-REM, "potential risks through the dermal and ingestion pathways are expected to be negligible". This conclusion was, as I fully documented in my review, and in even greater detail in a letter to the then Ontario Minister of the Environment, (also available at [www.phr4mwr.ca](http://www.phr4mwr.ca)) totally and blatantly false.

**The HHRE was evidently produced unsolicited by ENTECH-REM (CRA). It had evidently not initially been required by the then Ministry of the Environment (MOE), and when produced it evidently did not undergo any scrutiny by the MOE, or in any event none that was made public. The HHRA that was to**

have superseded the HHRE was also not formally required by the MOE or, later, the MOECC. Furthermore, as far as we could ascertain there was evidently also no formal procedure in place for the HHERA, had it materialised, to be critically scrutinised by MOE(CC)-appointed medical scientists.

Accordingly, had I as PHR4MWR's medical and scientific advisor not undertaken a Review of the HHRE, that badly flawed document (and/or, if it had materialised, the also problematic HHERA) might have ended up being *de facto* the only existing statement(s) on the health issues related to the proposed incinerator, and therefore, by default, would likely then have been perceived as being the "official" information on the subject. This is because ENTECH-REM vigorously promoted the fallacy that the expected HHERA, when produced, would be the "official" health risk document, and the Company indeed succeeded in planting this false perception. For example:

During the course of consideration of the Company's application, members of the MPH Council commented that a decision on the application should await the arrival of the HHERA.

Individual citizens who wrote to the MOE expressing opposition to the project and requesting elevation ("bump-up") to full Environmental Assessment (EA) received notices stating, amongst other information, the following:

"Please be advised that an Environmental Screening has been prepared for the Project under Ontario Regulation 101/07 - Waste Management Projects (Wastes Regulation). The project is exempt from Part II of the Environmental Assessment Act on the condition that this Environmental Screening is completed". (Emphasis added by me).

In response to a letter written by me to the then Minister of the Environment, Mr. Jim Bradley, in which I raised many of the concerns mentioned in this document, I was informed by an MOE official that "The Environmental Screening Process is a proponent driven, self-assessment process." "The proponent evaluates the potential for environmental impacts and appropriate mitigation measures, consults with the public and review agencies (such as the ministry), and prepares documentation which must be available for a 60 day public review period". "The Ministry of the Environment (MOE) does play an important role during the Environmental Screening Process as a government review agency. MOE Staff review the technical information submitted by the proponent and comment on issues such as impacts to air quality" (Emphasis added by me).

These items of information from the MOE did not appear to indicate that there was any formal requirement for an MOE-initiated, detailed scientific evaluation of the application. A full EA is not undertaken unless granted in response to elevation requests. We were informed that not all elevation requests are granted and in fact few are.

MOE officials whom we (PHR4MWR) were able to meet with in Toronto also led us to believe that consideration of the Company's application and our opposition to it would have to await the expected HHERA. On hearing our statements on the problematic nature of the Company's proposal, the officials did indicate that (an) MOE-appointed scientist(s) would review the application and our objections to it, for which we were grateful, but it was our impression that this comment was in response to our expressions of concern. As indicated, as far as we could ascertain, in the absence of actual elevation to EA there appeared to be no formal requirement for the MOE to itself initiate a detailed medical-scientific evaluation of health consequences of the application.



**Finally, (re "official" status of the HHERA), at the Ontario Municipal Board (OMB) Prehearing on 17 March, 2015 the OMB adjudicator expressed the tacit understanding that ENTECH-REM's expected HHERA would have been considered as "official" documentation, had it been available.**

**The problems with the Environmental Screening Report's HHRE identified in this section were errors of science that were committed by the company hired by ENTECH-REM. That company appears to have been trying to present a report that would satisfy the leadership of the Proponent ENTECH-REM, who had presumably engaged them under specific terms of employment. The scientific problems and clear evidence of bias would probably not have arisen had the ESP and ESR been done by an independent and expertly qualified agency appointed not by the Proponent but by the MOECC.**

#### **4. "PEER REVIEW"**

Hardy Stevenson and Associates (HSA) is a company that was periodically hired by the former Mayor and Council of the MPH, to perform what the company and the then Mayor referred to as "Peer Review". In this instance, HSA was hired by the MPH to perform a so-called "peer review" of CRA's ESR, including the HHRE. HSA's bill to the MPH for this service was to be paid by ENTECH-REM.

The term "peer review" originates from the academic and scientific world. It refers to a very rigorous process. It is arm's length and anonymous. Criteria for selecting the peer reviewers include: their internationally acknowledged, demonstrated expertise in the subject-matter being evaluated; their having no known connection or relationship with the author of the material that could bias their judgement; and their having no possible motive for being less than totally objective. The author of materials being peer reviewed has no choice in selection of reviewers, is not told who they are, and has no input to the reviewers before or after submission of the work.

In this instance, the proponent of the project (ENTECH-REM), the author of the ESR document (CRA) and the initiator and agency of prime interest in the project (the MPH Mayor, Council and Staff) were all known to the so-called "peer-reviewer", HSA. It was also well known publicly, and therefore also to HSA, that all of these members of the MPH (except for one councillor) were at that time all either openly or apparently in favour of the incinerator proposal. In addition, HSA had a long-standing relationship with the Mayor and MPH, as a company repeatedly employed by the MPH. Finally, both CRA and HSA were being paid by the Proponent, for respectively the ESR and the so-called "Peer-Review" of it. Furthermore, at least with respect to human health issues, HSA does not meet the criterion of possessing "internationally acknowledged expertise in the subject matter being evaluated".

This situation did not create conditions that could be seen to be likely to produce "expertly qualified", and "independent", "unbiased", and "uninfluenced" statements on the potential effects on human health and the environment of the proposed incinerator. The perception of the review not being arm's length was confirmed by the following:

Through FOI Requests we were able to ascertain that, in the period leading up to the release of CRA's ESR and HSA's so-called "Peer Review" of the ESR, at least one meeting had been held between representatives of CRA and HSA, and then incumbent MPH Staff who were, on the then Mayor's behalf, supportive of the ENTECH-REM proposal.

Unsurprisingly, the HSA so-called "peer review" Report was riddled with scientific error and misunderstanding, misinformation and false conclusions, as the ESR and specifically its HHRE had also been, and, also unsurprisingly, the HSA "peer review" concluded by endorsing the conclusions of the ESR. In a

written exchange with Mr. Hardy of HSA I pointed out the most egregious of the errors of his Report. My Comments are available in the PHR4MWR website, [www.phr4mwr.ca](http://www.phr4mwr.ca).

**The process of "Peer Review" would be, and would be seen to be, open and scientifically valid if the selection of a "Peer Review" agency to provide a second opinion on the Environmental Screening Report (ESR) were to be made by the MOECC, as with appointment of the agency that would produce the ESR itself. In both cases the agency would be selected by the MOECC without input from the Proponent or other parties with vested or political interest in the process, but of course the Proponent would cover all costs.**

## **5. HUMAN HEALTH AND ECOLOGICAL RISK ASSESSMENT (HHERA)**

The HHERA was a proposed document that was to have been prepared by CRA on behalf of the Proponent. It had at the outset no official status - its inception was due to a request by the local Medical Officer of Health, not the MOECC. However, by skilled use of spin the Proponent succeeded in creating the impression in the minds of many, unfortunately including some members of and representatives of government agencies, that this document would have official and authoritative status.

The so-called HHERA was, as mentioned, requested by the MOH. Citizens including PHR4MWR had no opportunity to comment on the procedure, and unfortunately the MOH failed to specify that any Health Assessment should be INDEPENDENT. **The MOECC evidently also did not demand that any health study should be independent, and, without any further requirements or conditions, MOECC officials whom we (PHR4MWR) were in contact with appeared to tacitly accept the potential authenticity and authority of this highly compromised endeavour.**

The endeavour was highly compromised, right from the outset, because:

1. It was not originally requested by the MOECC.
2. In requesting this Assessment the MOH had failed to specify that it should be done by an **independent, scientifically qualified** agency.
3. MOECC also did not intervene to demand that it should be done by an **independent, scientifically qualified** agency. It is not clear why the MOECC officials would accept the MOH's suggestion that the Proponent should be allowed to commission a HHERA that would not be independent, and done by a company that did not have documented scientific expertise in the health arena.
4. As a result, the agency that was employed to do this Assessment (CRA) was NOT an independent, scientifically qualified agency.
5. The agency so approved, CRA, was employed by and was to be paid by the Proponent.
6. CRA had already produced the HHRE. With the HHERA, CRA was therefore evaluating its own previous document on the subject.
7. That previous document (the HHRE) had been shown, in a Review of the HHRE by a qualified medical scientist (me), to be riddled with error, false and erroneous statements which demonstrated misunderstanding and ignorance of fundamental medical science, and false conclusions. Statements made in the document were backed up by zero peer-reviewed references. Every statement in my Review was documented by references (in all over 60 references, of which over 45 were from the peer-reviewed scientific literature).
8. CRA had not acknowledged the authenticity of the latter Review, and had not withdrawn its erroneous original document, the HHRE.

9. It was therefore not feasible that an HHERA, also done by CRA, would contradict the findings of the HHRE, nor could it feasibly come to any other conclusions than those of the HHRE, which had been shown to be false.

**The above are reasons why the declared intention by ENTECH-REM to deliver an HHERA that was to have been prepared by CRA was fatally flawed at the outset, but it appears that the MOE/MOECC did not intervene. Having apparently been given permission, or what the Company evidently perceived as approval to produce this document, the Proponent proceeded to perpetrate further abuses of the system, as follows.**

The release date of the HHERA was originally expected to be in November 2013, but it kept getting postponed, first to early 2014, then to April, then till "the summer", then "the Fall", then "by Xmas". Finally, individuals and groups who had submitted formal requests to MOECC for elevation of the ESP to a full Environmental Assessment (EA) were informed by the MOECC that **on 1 December 2014 the MOECC had received a letter from ENTECH-REM stating that the Company had withdrawn its Notice of Completion of the ESR.** It was stated that this was for the purpose of, amongst other things, **completing the HHERA** and to make revisions on its Environmental Screening Report. Recipients of this information from the MOECC were informed that the ESP herewith was terminated.

MOECC regulations evidently **allowed and condoned** that the Proponent had yet again, and now formally, demanded extensions of its time limits, and had now, evidently unilaterally, declared its ongoing revisions of its ESR and the ongoing delay of the compromised HHERA **to be open-ended, i.e. with indeterminate deadline.**

The MOECC informed us that as a result of this development, the Environmental Screening Process was accordingly no longer active. **ENTECH-REM was evidently not given any new deadline by the MOECC;** the Ministry had evidently **accepted the Company's unilateral declaration** that the expected date for the HHERA was now **INDETERMINATE.**

Furthermore, the MOECC also informed us that as a result of this development **THE MINISTRY WAS NO LONGER REQUIRED TO CONSIDER SO-CALLED "BUMP-UP" REQUESTS,** i.e. requests for the MOECC to elevate its ESP requirements for the Proponent from just an ESR to a full Environmental Assessment (EA). **Concerned citizens who had submitted "bump-up" requests were told that, when the Proponent finally did submit their HHERA, they (the citizens) would be allowed to submit new "bump-up" requests.**

PHR4MWR had submitted a very extensive elevation request that had represented **hundreds of person-hours of work, and included expert witness testimony from British and American experts whose statements had been commissioned at major expense, a heavy burden on a grass-roots group of citizens with no corporate financial resources. Several individuals citizens had similarly spent many hours submitting personal elevation requests.**

**MOECC informed concerned citizens that anyone who had any questions could call in to the MOECC to get further "information".**

Throughout the prolonged process described above, the Proponent had repeatedly claimed that the anticipated HHERA was the only legitimate source of information on health effects of the incinerator that any decision-making body at any level of government could consider, and that accordingly there could be no legitimacy in any decisions taken prior to the release of the HHERA.

The Proponent had used this argument to try to prevent the MPH Council from making a decision: the Company had actually taken the presumptuous step of sending an "urgent" message to the Council, on the day Council was scheduled to make a decision, implying that it could not legitimately make a decision, and virtually demanding of the Council that it NOT make any decision, without the information that the HHERA would provide. The Company again used this spurious assertion of the unique validity of the expected HHERA in its submission to the Ontario Municipal Board (OMB) prior to the OMB Pre-Hearing of 17 March 2015.

**As far as concerned citizens of Port Hope are aware, the MOECC evidently did not at any stage challenge ENTECH-REM's unsubstantiated and obviously false claim of legitimacy, not to mention unique legitimacy, for the mooted but ultimately non-existent HHERA. This lent weight to this claim in the public perception and, early in the process, even to members of the MPH Council. Also, as mentioned above, at the OMB Prehearing the OMB adjudicator indicated acceptance that this spurious report, if available, would have been taken to be authoritative.**

Citizens also find it inexplicable that MOECC condoned and fostered ENTECH-REM's behaviour in respect of the repeated postponements and ultimately the indeterminate extension, demanded by the Company for its HHERA.

**In Summary, Re the HHERA:**

- 1. The MOECC appeared to accept and condone the Proponent's false claim, and actions based on that claim, that the anticipated HHERA would provide the only legitimate, and, ultimately, binding statements, on the health effects of an ENTECH incinerator.**
- 2. Despite the fact that the HHERA had no legitimacy, either in the way its preparation had been authorised or in its potential content, MOECC allowed the deadlines for completion of the ESP to be repeatedly, and ultimately indeterminately, extended. This indeterminate extension had the potential of giving the Proponent the opportunity to try to "wait-out" public opposition to the incinerator.**

**As mentioned in Section 3, the probability of obtaining a scientifically valid and unbiased assessment in the Environmental Screening Process would be much increased if the process were not deemed to be "Proponent driven", and if instead the MOECC were to identify the agencies that are to be involved in management of the ESP, without input from the Proponent or others. It is also possible that if the process were not designated as "Proponent driven", other problems that were experienced *vis-a-vis* the HHERA could have been avoided. These problems include the Proponent's explicit and implicit declarations that no decisions on their application made before their HHERA was available would be legitimate; and the Proponent's unilateral decision to indefinitely extend its deadline for the HHERA.**

## **6. ENTECH-REM MISLED THE DECISION MAKERS WITH FALSIFICATIONS**

Throughout the course of ENTECH-REM's Environmental Screening Process the Company repeatedly made false statements to Port Hope Council, the MOECC, the public and even to a House of Commons Standing Committee. Many examples of this were brought to the attention of the MOECC by PHR4MWR and/or other sources.

In the following I list some of the more egregious falsities that the Company, its senior executives and its agents promulgated during the course of its campaign in Port Hope.

1. On 24 June, 2014, the Company's Executive Vice-President (EV-P) stated, in a presentation to the MPH Council, in the Port Hope Municipal Council Chamber and in the presence of a large audience that included members of the local press, that **the Ministry of the Environment had "endorsed" the Company's proposal to build an incinerator in Port Hope**. This statement was cited in the local newspaper *Northumberland Today*, on 26 June, 2014. PHR4MWR suspected this statement to be false and so asked the local Member of the Provincial Parliament, Mr. Lou Rinaldi of the Liberal Party, to obtain a clarification from the MOECC on this. **Mr. Rinaldi confirmed, as expected, that he was informed by representatives of the Ministry that no such "endorsement" had been given. Thus the EV-P's public statement was false.**

2. On 5 April, 2014 the Company's President and EV-P appeared in Ottawa as witnesses at a meeting of the House of Commons Standing Committee on Environment and Sustainable Development. A transcript of the proceedings of the meeting is available on line. The executives made presentations on the incinerator they hoped to build in Port Hope. Following the EV-P's presentation he was asked by a committee member, Mr. Bernard Trottier, MP for Etobicoke-Lakeshore, **whether their incinerator would put out any toxic emissions**. The EV-P replied that **only carbon dioxide and "water vapours"** would be emitted. **This statement was made by the EV-P despite the fact that the Company's own ESR, prepared by CRA, admitted in its HHRE (which, as indicated, is itself rife with falsity) that 18 toxic substances would be emitted, 16 of which had been documented to be cancer-causing. This directly false statement to the Parliamentary Committee was brought to the Committee's attention** and I was invited to make a presentation about this, and to correct the misinformation the Committee had been given.

3. As mentioned, the HHRE was rife with falsities. These falsities have been mentioned above (section 3. **The original HHRE in the ESR**). A full and detailed critique of the untruths perpetrated in the HHRE is given in my Review, available at PHR4MWR Web-site, [www.phr4mwr.ca](http://www.phr4mwr.ca).

Briefly, these untruths included: **a grossly incomplete list of toxins** that the HHRE admitted would be emitted; **a blatantly false statement about which of the toxins are cancer causing**; **a ridiculous statement claiming that cancer-causing toxins emitted would be "protective of a cancer risk level"**; and many more.

4. The Company repeatedly stated in its promotional material that its **proposed plant in Port Hope would perform recycling**, and the material to be incinerated would be the residue after the recyclable materials had been removed. **But the incineration process the Company was proposing to use, "gasification", REQUIRES that recyclable materials are incinerated**, in order to maintain the combustion process. The floor plans for the plant showed no recycling facilities; there was neither the capability nor the intention to do recycling in the Company's plans - **the statement in their promotional material about recycling was false**.

5. ENTECH-REM made much of a **claim to have an impressive track record, with numerous plants to their credit in various parts of the world**, including Australia, the home of the ENTECH technology, and Hong Kong, a very large megalopolis and a former crown colony of the UK. In fact, the company ENTECH-REM, and the parent Canadian company REM, **had never built or managed an incinerator anywhere in the world. The ENTECH technology had never been used anywhere in the Western world - neither the Americas nor Western Europe nor anywhere in the British Commonwealth**. The claims of plants in Australia and Hong Kong appeared to be designed to offset this lack.

Due diligence done by PHR4MWR revealed that despite its explicit claims, **the company had plants NEITHER IN AUSTRALIA NOR IN HONG KONG**. At the time the claims were made in their promotional material they had an application to build a plant in Australia, but it had not been approved. The plant that they claimed to have in Hong Kong featured prominently as the showpiece of their "track record" material,

including on page 1 of Appendix P of their ESR. But this plant did not exist. There had been an ENTECH plant in Hong Kong, but it had been decommissioned in 2006, seven years before the Company was flaunting it as the prime showcase example of their "track record", in their 2013 ESR and in other advertisements.

As other items in their "track Record", the **Company also repeatedly claimed in their promotional material that they had ongoing "projects" in California, and in Brant County, Ontario. These claims were also false.**

**The MOECC was made aware of these and other false statements by the Company. It is of concern that the apparent assumption that whatever the Proponent states is factual was evidently in no way dislodged or challenged by the accumulation of evidence to the contrary that was provided to the Ministry. To the outside observer, and specifically to the concerned citizens who opposed the construction of the incinerator, it seemed curious that the Company's dishonesty in negotiation, including falsification of credentials ("track record"), would not lead to instant dismissal of the Company's application.**

**Based on our experience in communicating our concerns to senior members of MOE (MOECC) staff in the course of this case, we respectfully submit that if the ESP were to no longer be deemed to be "Proponent driven", it would make it easier for MOECC staff to take cognisance of concerns brought to their attention, such as those mentioned here in Section 6.**

## **7. THE MOECC CONDONES - I.E. HAS NOT YET BANNED - USE OF INCINERATORS**

All types of incinerator produce cancer-causing poisons that can not be filtered out of the emissions that are released in to the air. Modern methods of waste management have made environmentally toxic procedures such as incineration totally redundant. Modern methods of waste management involve the Rs - Reduce, Re-use, Recycle, Resource Recovery (including composting), Restrict and Refuse (i.e. governmental restriction and refusal of permission to industries to produce un-recyclable materials, and to use un-recyclable packaging).

**For these reasons, we respectfully submit that no form of incineration of waste should be allowed to occur. THE CONCERNED CITIZENS OF PORT HOPE RESPECTFULLY REQUEST THE MOECC TO ENACT LEGISLATION THAT WOULD BAN ALL FORMS OF INCINERATION OF WASTE IN ONTARIO.**

## **8. THE "ALLOWABLE" LIMIT OF DEADLY POISONS SHOULD BE ZERO**

Genetic research shows that a single molecule of a cancer-producing poison can cause the genetic mutation that initiates cancer. There is no safe dose of such chemicals or of any cancer-causing agent. Research also shows that incinerators of all kinds emit numerous such poisons - up to hundreds of different chemicals, depending on the type of incineration - and research also shows that that there is no technology yet invented that can totally filter out all such cancer-producing substances.

Furthermore, even the smallest amounts of toxic and cancer-causing poisons that are released into the air can enter the human and animal food chain through the process of Bioaccumulation. The poisons reach soil, river water and rain, and get absorbed from the air, soil or water into plants, including crops and livestock feed. Thus the toxins enter vegetables as well as fish, cattle, poultry and other animal food-sources, accumulate over time in these, and end up in significant concentrations in the food on the dinner plates of the citizens.

**I respectfully suggest that the default position of a government agency, the goals, objectives and responsibilities of which are to protect the environment, should therefore be that:**

- 1. The allowable levels of cancer-causing agents is in general zero.**
- 2. Industrial activities that produce cancer-causing agents be disallowed, unless it can be shown that the industry provides a service for which no safer alternative is known.**

There are almost no known situations in which this latter case prevails. The one possible example that may still exist, albeit temporarily, is use of medical x-rays. X-rays cause cancer and should be avoided unless absolutely necessary for diagnosis or treatment. When absolutely necessary, the physician may order x-rays knowing that this incurs the risk of causing cancer, but the physician may determine that the risk to the patient's health of not doing the x-ray may be even higher, so doing the x-ray is deemed to be less harmful than not doing it.

Even this example will soon be obsolete, as non-invasive forms of screening such as ultrasound, MRI and others evolve to become more universally useful and more readily available.

This more or less unique situation where the risk to societal benefit of not doing the procedure may be even higher than the risk of harm of the procedure itself, and where there is no alternative way to achieve the benefit, is known as the Lesser Evil Principle. This principle does not apply to incinerators: they offer no benefit to society, and more effective and safer alternatives are well known, i.e. through the Rs, which achieve the objective of Waste Management without the deadly risks to human health and the environment that incineration carries.

## **9. EXISTING GOVERNMENT "STANDARDS" ARE NOT ENFORCED**

As mentioned in the previous section, the acceptable level for emissions of cancer-causing and other deadly toxins should in general be zero. In practice it will take time to achieve this goal, **but in the interim I respectfully suggest that it is reasonable to expect that those "guidelines", "standards" or "limits" that have historically been set by government agencies need to be enforced.**

The level of air pollution in Northumberland County is at this time already egregiously high. With respect to so-called fine particulate matter (PM<sub>2.5</sub>), background concentrations in the area were reported to be in the order of 20 µg/m<sup>3</sup> as far back as in 2009.

This concentration was already then **33% above the Canadian Environmental Protection Agency Guidelines level** for PM<sub>2.5</sub>, which was 15 µg/m<sup>3</sup>, and this background pollution level will certainly have risen to much higher levels in the years since 2009. **These 2009 levels of course far preceded the advent of the new Clarington incinerator as well as the additional pollution now being produced by St. Mary's Cement plant in Bowmanville,**

The Canadian Federal Government accepts that even at the reference level of 15 µg/m<sup>3</sup> **"there would be some level of health effects associated with the standard" - a strikingly important admission -** and that **"newer standards should come into effect over a staggered time frame"**. The **National Environment Protection Council of Australia** has expressed the same view.

The California Environmental Protection Agency Air Resource Board gives a reference value for PM<sub>2.5</sub> of 7 µg/m<sup>3</sup>. Thus the **level of fine particulate pollution in our area is not only 33% above the existing so-called local standard, it is also nearly three times the California Standard.** Federal Government policy is said to

be that "newer standards should come into effect". It is widely understood that air quality criteria do not provide an appropriate representation of the potential for adverse health effects from a facility.

**It is very concerning that, notwithstanding the above documented information on the deplorable status of the ambient air of the local environment, plants such as the new Clarington incinerator, St. Mary's Cement Kiln, the Six Nations Disintegrator, and now new incinerators being considered in Hamilton and in Peel County, still proceed without any apparent intervention from the MOECC.**

#### **10. MOECC REGULATIONS STATE NOTHING ABOUT NANOPARTICLES**

**The "Particulate Matter" pollution discussed above, in point 10, refers only to Fine Particulate Matter (PM<sub>2.5</sub>) and does not even consider Ultrafine or Nanoparticles, i.e. the particles that are a millionth the size of a pinhead. A published study describing specifically the ENTECH technology reported that it produces nanoparticles, that there is no known technology that can filter them out of the emissions, and that **there is no government regulation of nanoparticles**. The medical scientific literature indicates that nanoparticles uniquely get in to the brain, heart and all other human organs, carry the deadly cancer-producing poisons with them, and can produce cancer and other lethal effects.**

**The fact that MOECC regulations make no specific mention of Nanoparticles was made good use of by the Protagonist ENTECH-REM in its campaign in the MPH. The Company's representatives answered all criticisms related to the above-mentioned information about release of deadly nanoparticles by ENTECH technology, by stating that MOECC guidelines did not restrict their release of nanoparticles, that the issue of nanoparticles was therefore not their problem, and that we the concerned citizens should address our concerns to the MOECC.**

**It is not unusual for science progress to occur so rapidly that relevant updating of government legislation can not keep pace. In the past this has been accepted as an inevitable fact of life. However, we are now in an age of an expanding rate of pollution that is creating ever-increasing threats to the environment, with concomitant health consequences. The science of the health risks of nanoparticles, and the lethal cancer-producing chemicals that they carry with them, is new. WE RESPECTFULLY ARGUE, THOUGH, THAT ATTENTION TO THESE NEW SCIENTIFIC RESULTS BY GOVERNMENT AGENCIES CHARGED WITH MONITORING THE ENVIRONMENT COULD POTENTIALLY RESULT IN DRAMATIC BENEFITS TO POPULATION HEALTH.**

#### **11. REGULAR MONITORING AND ENFORCEMENT IS NEEDED**

It was argued above that the existence of so-called Government "Guidelines" which allow incinerators and other polluting plants to emit specific amounts of deadly emissions is an anachronism from a past era. In this day and age it is known that a single molecule of a cancer-causing poison can cause cancer, and that there is therefore no safe lower limit of such poisons. It is furthermore also known that minute amounts of emitted poisons accumulate in crops, fish and livestock over time. **Citizens concerned about the environment believe therefore that the only safe, acceptable and ethically responsible regulation that should apply is that the limit for such poisons should be zero.**

It is disturbing that this logic has not pervaded most government bureaucracies yet, (though some, for example in Australia, have recognised the need to move in this direction). **By providing allowable limits in the form of "Guidelines" or Standards" the MOECC and many other governments appear to continue to condone release of cancer and other deadly disease-causing poisons in to the environment,.**



**This being the case, it is even more disturbing when the public learns that even existing Guidelines are not sufficiently enforced. Daily monitoring of emissions of approved facilities is evidently not performed, and on rare occasions when monitoring is done and transgression of guidelines is discovered, there appear to be no consequences for the delinquent company. For example, the Durham Region online newspaper Oshawa This Week reported on 23 May, 2013, that In 2012, the St. Mary's Cement plant exceeded its allowed emissions of sulfur dioxide (SO<sub>2</sub>) and nitrogen oxides (NO<sub>x</sub>).**

<http://www.durhamregion.com/news-story/3455066-st-mary-s-cement-bowmanville-emissions-for-2012-raise-questions/>

**The newsletter stated that "The Bowmanville plant released 5,082 tonnes of SO<sub>2</sub> between Jan. 1 and Dec. 31, 2012. That's almost twice the company's annual limit of 2,808 tonnes. St. Mary's also released 3,291 tonnes of NO<sub>x</sub> in 2012, while the annual allowance is 2,553 tonnes".**

No consequences by way of government intervention appear to have resulted, and on the contrary, as indicated below, since that time the MOECC has evidently approved a request from this plant to be allowed to burn garbage, including recyclable materials, which will lead to further egregiously great toxic emissions.

## **12. ST MARY'S CEMENT PLANT IS EVIDENTLY NOW ALLOWED TO FUNCTION AS AN INCINERATOR**

Despite the well-reasoned and well-documented protests that the MOECC received from Liz Benneian and twenty other signatories on behalf of the Ontario Zero Waste Coalition, the Ministry had evidently proceeded in allowing St. Mary's Cement Plant in Bowmanville to burn "alternative fuels". **That is, this and other Cement Kilns are now allowed to function as incinerators, evidently without having to go through the Ministry's nominal Environmental Screening Process, flawed as we believe that process is, as described above. These plants are thus now allowed to burn valuable recyclable resources, frustrating the purposes of "R programmes", and are licensed to pour out in to the atmosphere deadly toxic substances that will bioaccumulate and contribute to the ever-increasing rate of cancer in the population.**

**I respectfully appeal to the MOECC to reverse its position on this issue. As mentioned above, all forms of incineration of waste should be banned.**

## **13. A VISION FOR THE FUTURE: PORT HOPE AS AN ENVIRONMENTAL LEADER**

Dating back to the 1930s, Port Hope's reputation has been challenged by the stigma of the town being the home of a radium and uranium refining plant, originally known as Eldorado, and the consequent issue of radioactive contamination. When ENTECH-REM in 2009 launched its attempt to place an incinerator in the municipality, environmentally concerned citizens were greatly disturbed at the prospect of a further assault on the local environment, and the new and added threat to citizens' health. The town's reputation appeared to be further threatened, and with that the prospect of attracting new industries further encumbered.

As discussed above, the threat was averted through a concerted effort by a grass-roots association of citizens, supported initially by a single outspoken municipal councillor and ultimately, after municipal elections, by a new Mayor and counsellors. **But all are all aware of the fact that this victory is fragile: there has already been an intimation of a renewed attempt to build an incinerator in Port Hope.**

**Forward-looking people in the MPH wish to see the image of our beautiful and historic town turned around, from one of historical contamination and a potential threat of new pollution, to that of a clean and pristine community, LEADING THE COUNTRY IN ENVIRONMENTALLY SOUND PRACTICES. And for these objectives there could be no better way forward than to promote the development in our**

municipality of a CENTRE OF EXCELLENCE IN ENVIRONMENTAL RECYCLING TECHNOLOGIES, with support for the establishment of a CORE OF RECYCLING INDUSTRIES and a SCHOOL OF ENVIRONMENTAL RECYCLING SCIENCES in our town.

In support of this proposal I submit that:

The town is sorely in need of new industries, and we believe that RECYCLING INDUSTRIES would not only be a perfect fit for our community, but also that they CONSTITUTE A SECTOR OF CERTAIN FUTURE EXPANSION IN CANADA. To get in on the ground floor level with support of this sector, backed up by the educational approach, would be a valuable contribution to the municipality's development. Support from the MOECC for this thrust would be essential and invaluable.

To encourage the influx of new industries and in preparation for this, the MPH has already developed a potential industrial park area, close to highway 401 and serviced with the necessary infrastructure to allow of rapid access and settlement.

The thrust proposed here would have the whole-hearted support of the citizens of Port Hope. In our battle to prevent the advent of the incinerator we canvassed the citizens of Port Hope, who showed their overwhelming support of our campaign to deal with the waste disposal issue through the environmentally friendly approach of the Rs.

The ideas expressed here have been tentatively and informally raised at various levels of local government and been met with positive responses. In a question period at a MPH Council meeting the idea of support for recycling industries was suggested and was well received. Also, the possibility of finding a home for a School of Recycling Sciences has been raised.

The latter idea was broached *inter alia* at an informal level with Cobourg's Fleming College. Although the idea of a school of this nature for this area is viewed positively, this discipline was not seen to be an appropriate fit for that College's existing programme.

Other possible bases for an educational institution of this nature that might be worth exploring include, for example, an outreach programme here in Port Hope for an existing School in the neighbourhood. Possibilities might include e.g. The University of Ontario Institute of Technology, Trent University, or others. The Liberal candidate for the upcoming Federal Election has been approached and has expressed support for the idea of such a Centre in our region.

I respectfully commend these ideas on future development of Port Hope as a centre of environmental excellence to your consideration, Minister Murray.

## CONCLUSION

In this Statement I have documented how the battle by citizens of Port Hope to prevent a company to build an incinerator in our town demonstrated an anomaly in the role the MOECC plays in the Environmental Screening Process. This citizens' battle showed that the regulations, established procedures, and interpretations of these exercised by the MOECC, appear to support potential industrial polluters and to oppose and frustrate the efforts of people who strive to protect their environment.

I respectfully submit that the role of the Ministry that is formally in charge of defending the environment should be to **oppose** polluting industries and to **support** citizens' attempts to protect the environment. **I respectfully urge you, Minister, to take steps to correct the obviously incongruous situation that currently exists.**

**I further respectfully request your consideration of the possibility of MOECC support for the development in Port Hope of a Centre of Excellence in Environmental Recycling Technologies.**

Dr. Stan R. Blecher MD, FCCMG  
Port Hope  
7 September, 2015

---

f/n: Incinerator - MOECC PROCEDURES SUPPORT POLLUTERS.docx Update 4/12.15