



environmental
defence

May 16, 2025

Environmental Assessment Branch
135 St Clair Ave West, 4th floor
Toronto, On
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RE: ERO 025-0389 Removing Environmental Assessment Requirements for the York1 Waste Disposal Site Project

Environmental Defence Canada opposes the removal of the Environmental Assessment (EA) requirements for the York1 waste disposal site project as proposed under the *Protect Ontario by Unleashing our Economy Act, 2025*.

It is shameful that the government is proposing to backpedal on its promises just one year after designating this project for a comprehensive EA.

EAs allow for public scrutiny of developments that are likely to have an impact on the environment and the local community. Each project requires a full assessment to determine whether it is able to deliver what the proponent suggests, whether the project should go ahead, and if mitigation measures are needed. A project of this size should be subject to public scrutiny, monitoring and reporting to ensure it is not creating unintended harm to the environment and the health of the surrounding community.

If the dump is developed without an EA, the extent of the impacts on the environment and the community will not be fully known until it is too late, and the threats have already become a reality for Chatham-Kent.

Potential harm to the environment and the surrounding community

York1's proposed landfill would cause severe, irreversible harm to the Sydenham River, a well documented biological hotspot that is home to at least 33 species at risk. The site is adjacent to Molly's Creek, a spring-fed stream that flows directly into the Sydenham River. If developed, toxic substances and chemicals such as phthalates from PVC, mercury from switches, and asbestos from the demolition of older buildings could leach into Molly's Creek and eventually into the Sydenham.



This would contaminate critical habitats and threaten some of Ontario's rarest species like the Eastern spiny softshell turtle and Salamander mussel, pushing them closer to the brink of extinction.

The dump would also have significant impacts on the residents of Dresden and municipal infrastructure as the proposed site is less than one kilometer from town. York1 is proposing the waste processing facility to be open 24 hours a day, seven days a week, with up to 700 trucks a day coming into the community. The chemical air quality (e.g. NOx, CO, CO2), noise, and particulate matter pollution impacts on the people of Dresden and Chatham-Kent from this massive increase in truck traffic should be thoroughly evaluated with a comprehensive EA.

Building more landfills is not a solution to Ontario's waste problem

The government is arguing this dump is necessary to mitigate the threats from the U.S by building more capacity for waste in the province to avoid export to the U.S. and to "protect Ontario." This is giving Ontarians the false impression that we must choose between the economy and the environment. In reality, Ontario's economy, health and sovereignty is directly linked to a thriving, healthy environment.

Building more landfills is a band-aid solution to the province's waste problem. Rather than relying on small towns to store big city waste, the government should prioritize solutions that reduce the amount of waste that is produced in Ontario, including a deposit return program for non-alcoholic beverages, landfill bans, investments in reuse, and better recycling and reuse rules for Institutional, Commercial and Industrial wastes.

We thank you for the opportunity to comment on this proposal and ask that this project continue to be designated for a comprehensive EA.

Sincerely,

Rebecca Kolarich
Program Manager
Environmental Defence Canada