

Community Communications Plan Comment and Response Table

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1	11/ 19/ 2012	<p>We have reviewed the Draft Community Communications Plan, dated September 2012 and provide the following comments:</p> <p>6.0, 7.0 and 8.2: Local Schools are noted as an audience, with further detail in consultation and forums. "Clarington has large private schools which are not mentioned and should be included. 6.0 and 7.0: An audience in addition to professional institutions would be local service clubs and organizations.</p> <hr/> <p>7.0: We are pleased to see the DYEC is noted as the location for committee meetings.</p> <hr/> <p>8.1: The real time emission display board requires a Sign Permit under Sign By-law 2009-0123.</p> <hr/> <p>10.0: Communication Measurement, Evaluation and Feedback, the complaints that are submitted to the DBO should be automatically made available to the EFWAC and EFW-WMAC committees. It is not clear in the outline that this would occur.</p> <hr/> <p>The communications plan for the DBO should be reviewed with the EFWAC and EFW-WMAC committees. Clear distinctions between communication roles and responsibilities of the DBO and owner (Durham/York) should be evident in both plans.</p> <hr/> <p>11.0: Changes to the Communications Plan should include the EFWAC and EFW-WMAC Committees in addition to MOE.</p> <hr/> <p>12.0: The Upcoming Public Meetings anticipated for the fall of 2013 and early 2015 should be held in close proximity if not at the DYEC.</p>	<p>The Region consults annually with school boards who have in the past utilized our school programs, and expressed interest by responding to information packages on education programs which had been prepared and sent to all schools within Durham Region. Wording has been revised to state that our programs are available to all schools within Durham Region or neighbouring municipalities at the request of the school/staff.</p> <p>The Project Team considers local service clubs and organizations to be captured under the "Public" category.</p> <p>Commentary. No response required.</p> <hr/> <p>The Sign Permit process will be followed for the electronic message board.</p> <hr/> <p>Monthly Complaint Logs are provided electronically to all EFWAC members and the MOE and are also made available on the project website and will continue in accordance with the Complaint Protocol which has also been reviewed by the EFWAC members. The wording of the Community Communications plan has been revised to reflect the fact that this is already standard procedure.</p> <hr/> <p>As the contractor responsible for the design, construction, and operation of the facility, Covanta is an important stakeholder that should be consulted on all submissions related to the facility. As a contractor to the Regions, clear differences between the Regions' communication plans and Covanta's corporate communication plans will be set. The Region included Covanta in the review of this plan to ensure Covanta clearly understands the requirements of the Owner's communication plans/objectives and those of Covanta's corporate plan. Covanta's corporate communication plan will require oversight by the Owner's to ensure compliance with the Project Agreement and are outside of the scope of the Regions' EA Condition 7 communications plan requirements.</p> <hr/> <p>Future changes to an approved Communications Plan will be done in consultation with the MOE and presented to the EFWAC.</p> <hr/> <p>Future public meetings and Advisory Committee meetings are intended to be held at the facility once the Visitor Centre is complete.</p>
2	03/17/2013	<p>Greetings, Pro incineration, with thanks. Incineration was first brought to my attention as a teen by my father who read farming magazines from the United States. A specific case that sparked my</p>	<p>The Regions will continue to communicate the importance of their award winning waste diversion programs, where materials that are recyclable or reusable are</p>

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		<p>immediate interest and advocacy of incineration was of a concrete factory that used the heat to warm its factory and produce its product, used the little amounts of remaining ash for its concrete product, etc. I cringe when I pass municipal dumping stations and visualize the tons of waste that lingers for so many years; gradually and slowly weeping into the water systems. I know that we have come great strides in our mindfulness of our management methodologies but think we are ready for more. We know that one of the largest hurdles that presents itself is education for the public; based on subjective interpretation. It is possible that a natural reaction would be "throw away" more if it were to be incinerated, but recycling must still be part of people's routine. Otherwise, since disposal routines are interpreted in so many ways it may be advisable to create more jobs and factory develops during this endeavour to build sorting stations where which all materials are commonly gathered and floated/weighed/shaken/etc to find their most useful disposal/re-use destination.</p>	<p>removed from the waste stream before reaching the EFW facility. The EFW facility compliments these programs by allowing for recovery of energy and metals from material that is otherwise non-recyclable. In addition, as part of our integrated waste management hierarchy, introducing Recovery as the 4th R will be included as it relates to Energy Recovery and Metal Recovery from the EFW process.</p>
3	03/18/2013	<p>Please consider acting upon the following comments and suggestions to improve the Draft Community Communications plan.</p> <p>My initial reaction to this Draft Plan is that it seems the proponents will be using this primarily as a platform to promote the incinerator industry rather than to focus on informing the public of the operating performance of the facility as required by condition 7. The draft plan even envisions elementary and secondary school students as a target audience. I doubt that they will be provided a balanced objective discussion of the pros and cons of incineration. Regardless, my review of the draft plan does not leave me with a feeling that the public will be provided with the factual information necessary for them to be able to evaluate the safety and operational effectiveness and efficiency of the facility. The public's primary concern is with health and the environment and therefore they want to be objectively and honestly informed in a timely manner of the information that will allow them to make that judgement. I don't think the draft plan will accomplish this.</p> <p>One only needs to look at the name of the facility, the "Durham York Energy Centre", to understand the reasons for my reaction and skepticism. The proponents realize that the word "incineration" has a negative connotation for many members of the general public and have gone to great lengths to hide it from view. I thought that the term "Energy from Waste" was bad enough. Naming the facility the "Durham York Energy Centre" is a misnomer of the highest magnitude. School children and some badly informed adults will believe that this is a great way to help relieve the energy problem. Nothing could be farther from the truth, scientists estimate three to four times more energy is saved by reusing and recycling resources rather than than burning them. Incineration certainly isn't a clean source of energy. Mass burn incinerators contribute more greenhouse gases per kwh than coal-fired power plants. There is little evidence in this document that suggests a balanced approach to the information conveyed will be followed.</p> <hr/> <p>Perhaps more important is the failure of this report to make clear just exactly what information will be communicated, to whom, by whom, and when etc.. In other words there is little information in this report that describes the content of the various reports that will be provided to the various audiences. Some of this information may be in this draft but unfortunately it is not clearly and concisely presented.</p> <p>As a very concerned member of the public, please consider the following. Of particular concern to</p>	<p>School Outreach - Durham's waste education program is based upon a "request" only basis, hence, if a school or Board makes a request they are considered an "Interested Party". As with our current School Outreach program any presentation or information exchange is tailored to the school board, teacher, instructor or professor who makes the request and is subject to their review and approval.</p> <hr/> <p>The purpose of this Plan as defined by Condition 7.3 is to define how information is disseminated; how the public and aboriginal communities will be notified; and the procedures for keeping interested parties informed (refer to Condition 7.3 a, b c). This Plan identifies the intended audience and what method/media/venues will be utilized to reach the audience. Additionally Condition 7.4 defines what types of information should be made available to the public through a website, to which the Regions have continually maintained. The details on the specific reports and information to be disseminated are defined separately by the EA and CofA</p>

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		<p>the public are the emissions that this facility will be producing. I would like this plan to show in a concise and informative manner exactly what emissions information (for each contaminant) will be reported to whom, by whom and when. It is also important for the plan to show who performed the test procedures and whether or not the various test procedures and results have been audited. As a member of the public I would like to know how emission exceedances will be reported and how they are dealt with. It would also be helpful to know if the facility is operating effectively and efficiently. As an example will the public be informed of the amount of electricity going to the grid, the natural gas consumption etc..</p>	<p>documents or the Project Agreement (PA). It is not the intent of this Plan to provide specific details on what information is reported or how it is expressed, as this will vary according to the audience. As with all the Region's public facilities, clear, concise, factual and timely information must be provided to satisfy the EA, CofA and any regulatory requirements.</p> <p>Emissions reporting is outside of the scope of EA Condition 7, however, documents required to be submitted to the Ministry of Environment will form part of the public record. The public record file can be accessed by the public through the MOE Regional Director, the MOE District Manager, The Regional Municipal Clerks in Durham and York Regions and the Energy From Waste Advisory Committee in accordance with EA Condition 3. In addition all documents are posted to the project website in accordance with EA Condition 7.4 and will be accessible at the facility Visitors Centre in accordance with Certificate of Approval Condition 16, once construction is complete and the facility opens to the public. A table outlining reporting requirements and where and when these reports will be made available is provided in Section 8.6 and Appendix F of the revised plan.</p>
		<p>Speaking of exceedances, it is my understanding that the public will not be informed of exceedances caused by equipment and process malfunctions. This facility is owned by the taxpayers of Durham and York. Therefore, on what grounds are they to be denied this information? This is an area of potential abuse. Situations such as the Metro Vancouver/Covanta and Cache Creek fiasco over unsafe ash reporting need to be avoided</p>	<p>The safety and operational effectiveness of Regional infrastructure such as water, sewage or waste management facilities are of paramount importance. As the owners and operator of the EFW, we must be aware of daily operations and facility performance. It is the Regions' and Covanta's job to communicate to the public the findings of our operations and systems performance. We are committed to a host of environmental testing and will communicate the results as required by our operating approvals through the MOE to the advisory committees and make available through project website and at the Visitors Centre. The EA, CofA and associated plans state reporting dates and timelines and have been reviewed by the EFWAC.</p> <p>All documents required to be submitted to the Ministry of Environment will form part of the public record. The public record file can be accessed by the public through the MOE Regional Director, the MOE District Manager, The Regional Municipal Clerks in Durham and York Regions and the Energy From Waste Advisory Committee in accordance with EA Condition 3. In addition all documents are posted to the project website in accordance with EA Condition 7.4 and will be accessible at the facility Visitors Centre in accordance with Certificate of Approval Condition 16, once construction is complete and the facility opens to the public. A table outlining reporting requirements and where and when these reports will be made available is provided in Section 8.6 and Appendix F of the revised plan.</p>
		<p>As a member of the public I would like to see this plan prepared in a format such that it would be the tool for users to refer to find out what information will be available and where and when it can be accessed. For the sake of clarity please consider the use of tables and schedules to accomplish</p>	<p>All data presented to the public will be appropriately prepared to ensure it is understandable to a general audience. The use of graphs, tables and text will be utilized similar to what is done with our Water and Sewer reports.</p>

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		<p>this.</p> <p>In summary, it was not the intention of the Minister of the Environment for the Communication Plan described in Condition 7 to be a public relations platform for the incinerator industry. Please instead make it a plan where it will be clear for all stakeholders to see exactly what information will be provided to them so that they can meaningfully evaluate and judge the safety and efficiency of this facility.</p>	<p>Should the MOE communicate that this plan not meet the condition, the project team will revise accordingly as this has been the process for all draft plans prior to final plan submission.</p>
4	03/18/2013	<p>I like your communications plan and your respect for the Aboriginal community. I would like to see you develop and send out a quarterly newsletter to keep anyone who signs up for it, informed and educated. I also like the social media initiatives that you have planned. Thank you for sharing on your web site.</p>	<p>The Region currently uses a variety of 'newsletter' type information sharing for its other facilities and programs. EFW related items have been and will continue to be included in this process.</p>
5	03/18/2013	<p>I am in full support of the incinerator. My only concern is that my garbage these days consists of only plastic and styrofoam wrappings. I am hoping that the furnaces burn at high enough temp to cancel out any concerns that from the carcinogens created from there incineration. Pretty much all household garbage will be of this nature if people are doing there conservation part properly</p>	<p>This comment is outside the scope of EA Condition 7 communications plan requirements.</p>
6	03/27/2013	<p>My concerns about the draft EFW Communications Plan are as follows: The draft Communications Plan significantly deviates from what is set out in the Minister's Condition 7. The Minister's condition speaks to communicating factual information about the undertaking (operations, monitoring), however the Regions' Project Team has inserted/added their own objectives, messages and beliefs into the Communications Plan, which include promoting incineration and their waste policy.</p> <hr/> <p>The Plan contains misinformation, even indicating that the EFWAC Committee should promote the facility. Statements such as "Diversion and recovery through Energy-form-Waste technologies are compatible not competitive" are opinion, not fact. There are implications for Durham residents not only with respect to what information they will receive, but there are also financial implications for them as taxpayers. The Plan is mandated by Condition 7 which is legally binding. We do not believe that Durham taxpayers should be financially responsible for promoting waste policy which includes incineration. We believe that our community does not want to take on promoting incineration for the industry in any form. The Project Team consulted with Covanta prior to developing their draft Plan, but did not consult with the community. In his Condition 7, the Minister identified interested members of the public and Aboriginal communities as the target audience.</p>	<p>The purpose of this Plan as defined by Condition 7.3 is to define how information is disseminated; how the public and aboriginal communities will be notified; and the procedures for keeping interested parties informed (refer to Condition 7.3 a, b c). This Plan identifies the intended audience and what method/media/venues will be utilized to reach the audience. Additionally Condition 7.4 defines what types of information should be made available to the public through a website to which the Regions have continually maintained. The details on the specific reports and information to be disseminated are defined separately by the EA and CofA documents or the Project Agreement (PA). It is not the intent of this Plan to provide specific details on what information is reported or how it is expressed, as this will vary according to the audience. As with all the Region's public facilities, clear, concise, factual and timely information must be provided to satisfy the EA, CofA and any regulatory requirements.</p> <hr/> <p>The term "promotion" as it relates to a 4th R has been removed from the plan.</p> <p>As the contractor responsible for the design, construction, and operation of the facility, Covanta is an important stakeholder that should be consulted on all submissions related to the facility.</p> <p>As a contractor to the Regions, clear differences between the Regions' communication plans and Covanta's corporate communication plans will be set. The Region included Covanta in the review of this plan to ensure Covanta clearly understands the requirements of the Owner's communication plans/objectives and those of Covanta's corporate plan. Covanta's corporate communication plan will require oversight by the Owner's to ensure compliance with the Project Agreement and are outside of the scope of the Regions' EA Condition 7 communications plan requirements.</p>

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		<p>The Regions' Plan, however, also envisions elementary and secondary school children as a target audience. We have concerns about this vulnerable audience since the content of the draft Plan deviates from the Minister's condition with the addition of Regional "objectives" and "key messages".</p> <p>The focus of the Community Communications Plan should be to inform about the operations of the facility, including all monitoring activities. Items seem to be lacking from the draft Plan such as: o timely notifications to the public when the facility has exceeded their operational limits and when there have been malfunctions; o notifications to the public should there be any applications by the Regions or Covanta to amend operating limits, Certificates of Approval or other documents and approvals; o provision that all monitoring data and results be made publicly available upon request – the planned display board outside the facility and live website streaming of the monitoring of some pollutants is not a substitute; o the details of what the Annual Reports will include Thank you for taking time to read my email.</p>	<p>The draft Community Communications Plan was posted and open for public consultation on the project website in October 2012. Residents who wanted to comment had six months to do so. In total 21 comments were submitted on the Draft Community Communications Plan. A public service announcement (PSA) was issued to all local media on January 16, 2013 reminding the public that the comment period has been extended to March 30, 2013. York Region communications issued their own PSA to the media on January 17, 2013. The PSA was also posted on both regional municipality's websites and the project website. The PSA was re-issued to local media on February 20 as an additional reminder of the public comment period. The PSA was sent out again as a final reminder on Mar. 13. These PSAs generated the following coverage from various local media outlets:</p> <p>Metroland Media Newspapers - March 18. Durham Radio News - Jan. 16 The Oshawa Express - Jan. 23 and Feb. 20. The Scugog Standard - Mar. 21. The Durham Citizen - Feb. 21.</p> <p>Residents were also advised of the DYEC draft Community Communications Plan through a paid advertisement for the Energy from Waste – Waste Management Advisory Committee placed in all Metroland community newspapers across Durham Region on Jan. 30, 2013. In addition, social media messages were posted on the Region's social media sites (Facebook and Twitter) along with a direct link to the Community Communications Plan from January through March 2013. These advertisements are posted on the project website at the following link: http://durhamyorkwaste.ca/project/media.htm</p> <p>School Outreach - Durham's waste education program is based upon a "request" only basis, hence, if a school or Board makes a request they are considered an "Interested Party". As with our current School Outreach program any presentation or information exchange is tailored to the school board, teacher, instructor or professor who makes the request, and is subject to their review and approval.</p> <p>All documents required to be submitted to the Ministry of Environment will form part of the public record. The public record file can be accessed by the public through the MOE Regional Director, the MOE District Manager, The Regional Municipal Clerks in Durham and York Regions and the Energy From Waste Advisory Committee in accordance with EA Condition 3. In addition all documents are posted to the project website in accordance with EA Condition 7.4 and will be accessible at the facility Visitors Centre in accordance with Certificate of Approval Condition 16, once construction is complete and the facility opens to the public.</p>

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			A table outlining reporting requirements and where and when these reports will be made available is provided in Section 8.6 and Appendix F of the revised plan.
7	03/27/2013	<p>The draft Communications Plan significantly deviates from what is set out in the Minister’s Condition 7. The Minister’s condition speaks to communicating factual information about the undertaking (operations, monitoring), however the Regions’ Project Team has inserted/added their own objectives, messages and beliefs into the Communications Plan, which include promoting incineration and their waste policy. The Plan contains misinformation, even indicating that the EFWAC Committee should promote the facility. Statements such as “Diversion and recovery through Energy-from-Waste technologies are compatible not competitive” are opinion, not fact. There are implications for Durham residents not only with respect to what information they will receive, but there are also financial implications for them as taxpayers. The Plan is mandated by Condition 7 which is legally binding. We do not believe that Durham taxpayers should be financially responsible for promoting waste policy which includes incineration. We believe that our community does not want to take on promoting incineration for the industry in any form. The Project Team consulted with Covanta prior to developing their draft Plan, but did not consult with the community. In his Condition 7, the Minister identified interested members of the public and Aboriginal communities as the target audience. The Regions’ Plan, however, also envisions elementary and secondary school children as a target audience. We have concerns about this vulnerable audience since the content of the draft Plan deviates from the Minister’s condition with the addition of Regional “objectives” and “key messages”. The focus of the Community Communications Plan should be to inform about the operations of the facility, including all monitoring activities. Items seem to be lacking from the draft Plan such as: o timely notifications to the public when the facility has exceeded their operational limits and when there have been malfunctions; o notifications to the public should there be any applications by the Regions or Covanta to amend operating limits, Certificates of Approval or other documents and approvals; o provision that all monitoring data and results be made publicly available upon request – the planned display board outside the facility and live website streaming of the monitoring of some pollutants is not a substitute; o the details of what the Annual Reports will include</p>	<p>Form letter. Same Responses as those given in Item #6 and #13 and #20.</p> <p>The purpose of this Plan as defined by Condition 7.3 is to define how information is disseminated; how the public and aboriginal communities will be notified; and the procedures for keeping interested parties informed (refer to Condition 7.3 a, b c). This Plan identifies the intended audience and what method/media/venues will be utilized to reach the audience. Additionally Condition 7.4 defines what types of information should be made available to the public through a website to which the Regions have continually maintained. The details on the specific reports and information to be disseminated are defined separately by the EA and CofA documents or the Project Agreement (PA). It is not the intent of this Plan to provide specific details on what information is reported or how it is expressed, as this will vary according to the audience. As with all the Region’s public facilities, clear, concise, factual and timely information must be provided to satisfy the EA, CofA and any regulatory requirements.</p>
8	03/27/2013	<p>This whole project is B.S. No good jobs, lots of pollution, of questionable content. No accountability. No real transparency. Pubic input frowned on and ignored. Few friends of politicians making money, taxpayers paying in the end. Millions spent on a MRF, yet an incinerator is built, how much recycling and hazardous waste do you think will get burned? More than will ever get reported.</p> <hr/> <p>I saw it happen at the MRF, batteries , and hazardous waste straight to the garbage at the Durham Regional Facility. Never one ounce of training about either, never instructions of where or how to dispose of properly. Only temporary service employees told to throw it in the garbage. No accountability. Hazardous Waste containers compacted in the garbage and leaking onto the floor and into the 1 sewer leading to ?????....CLOCA land behind.</p> <p>Audits done out of sight by Metro Waste to measure the amount of recycling going to the garbage, what a joke. Do you think Metro was going to actually willingly capture its own waste, so it could pay a fine when it exceeded its limits. It was so obvious, it was like Durham Region was turning a blind eye.</p> <hr/> <p>Durham Region not stating in its own contract that it drafted that it had the right to monitor the line speed of the facility at any given time. Faster line = more recycling in the garbage, pickers can only</p>	<p>This comment is outside of the scope of EA Condition 7 requirements.</p> <hr/> <p>This comment is outside of the scope of EA Condition 7 requirements.</p> <hr/> <p>This comment is outside of the scope of EA Condition 7 requirements.</p>

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9	03/28/2013	<p>This incinerator like all incinerators is yet another example of human folly which will directly impact all, present and especially into the future. When we stop buying into cheaply made foreign products then there will be no need to continue to be a throwaway society and use such terms of waste elimination. Thankfully we have entered into a new age of enlightenment and r=evolution. Please test the air, soils and water/fish at different intervals surrounding this ecological monster and make</p>	<p>This comment is outside the scope of EA Condition 7 requirements.</p>

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		<p>the results known openly. Right from the start the incinerator project was a decided matter with little to no consideration to actual public input, proponents are suspect to say the least. Our children shall judge us...</p>	
10		<p>Having followed the EFW issue since 2006 in the media and by attending various meetings of Clarington Council, Durham Region Council and various R.M. of Durham committee meetings as well as the very few PIC's, I conclude that the politicians who have forced this EFW facility on us have been less than honest. Likewise, the various 'consultants' hired by the Region to sell this project have likewise been dishonest and evasive.</p> <p>The Ontario Ministry of the Environment has not enforced the scant few stipulations placed on the proponents, nor it seems that they care.</p> <p>Getting factual information from the politicians and from the Regional website is a waste of time, as it is not forthcoming.</p> <p>I am very disappointed in the entire process from start to finish, and I especially hold MOE responsible.</p> <p>I could write volumes as it pertains to the lack of honesty and lack of transparency at the Local and Regional (political) level, but why bother; they don't seem to care about public opinion and it would appear to me that the same applies to MOE.</p> <p>Given my experiences above, I have no suggestions for MOE or Durham Region going forward as it pertains to a communications plan as I doubt the future will hold any greater promise than the past; as I have lost faith and trust in both.</p> <p>My only remaining action is to make my feelings known at the ballot box for all three levels of government involved.</p>	<p>This comment is outside the scope of EA Condition 7 requirements.</p>
11	03/29/2013 Part A	<p>I. <u>Introduction</u></p> <p>This submission is in response for Community involvement in the development of a Communication Plan for the Durham Incinerator Project. The development of such a Communication Plan is part of a list of requirements set forth by the Minister as conditions of approval.</p> <p>This submission will necessarily be brief, as previous experience on the matter of the Incineration has demonstrated the futility of attempting to bring rationality and factuality into the realm of the discussion and evaluation processes.</p> <p>Thus, specifics about the expensive and socially irresponsible project known as "The Incinerator" will not be discussed here. However, the "Communication Plan" must address issues that are directly related to the performance and social footprint of the Incinerator.</p> <p>Contrary to what early information has indicated, the "Communication Plan" should <u>NOT</u> be used as a "Marketing Tool" for the technology of Incineration and as a platform for its proponents.</p>	<p>The purpose of this Plan as defined by Condition 7.3 is to define how information is disseminated; how the public and aboriginal communities will be notified; and the procedures for keeping interested parties informed (refer to Condition 7.3 a, b c). This Plan identifies the intended audience and what method/media/venues will be utilized to reach the audience. Additionally Condition 7.4 defines what types of information should be made available to the public through a website or other means which the Regions have continually maintained. The details on the specific reports and information to be disseminated are defined separately by the EA and CofA documents or the Project Agreement (PA). It is not the intent of this Plan to provide specific details on what information is reported or how it is expressed, as this will vary according to the audience. As with all the Region's public facilities, clear, concise, factual and timely information must be provided to satisfy the EA, CofA and any regulatory requirements.</p> <p>As required by Condition 15 of the Certificate of Approval, the annual report is due March 31st of each year and will include details such as the annual electricity generation and electricity exported to the grid, and quantities of unacceptable</p>

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		<p>Rather, it must provide substantive information to the Community in a timely manner about actual plant performance and specific issues as they arise. It must also serve as a tool to document compliance to previously made commitments.</p> <p>The information provided below is based on commitments made by proponents in the E.A. and, as such, they form the basis on which the Minister’s authorization to proceed was granted.</p> <p>Thus, it is essential that such commitments be complied with.</p> <p>II. Concerns</p> <p>There are three aspects about the Incinerator that are addressed in this paper, namely</p> <ul style="list-style-type: none"> o the <u>Electrical Output</u>; o the <u>Natural Gas Requirements</u>; o the <u>Handling of Hazardous and Unacceptable Waste</u>. <p>III. The Electrical Output</p> <p>Project documentation indicates that the rating of the Generator was set at 20 MW in order to allow for possible future plant capacity increase from 140k Tonnes/year to 250K Tonnes/year (Ref. 1a). With the currently approved tonnage of 140 K Tonnes/year, the maximum electrical production was estimated at 13.6 MW in a document submitted by Covanta (Ref. 1b).</p> <p>This value was included in the E.A. prepared as part of the project approval process. More specifically, the electrical production capacity was estimated at 11.9 MW (if both district heating and electricity were produced) and 13.6 MW (if only electricity is produced, i.e. no district heating capacity exists). This latter value of 13.6 MW is the case of interest here (Ref. 1c).</p> <p>Thus, although there is the possibility of operating the generator at its full rated output of 20 MW in order to improve the economics of the project, this could only be achieved at the expense of an increased natural gas consumption in the boiler.</p> <p>More importantly however, this would be inconsistent with the claims in the E.A. that led to the issuance of a License to Operate by the Ministry of the Environment.</p> <p>Details about the Facility Energy and Lifecycle Analysis Technical Study Report are found in Appendix C-3 of the E.A. and there is nothing in this Appendix that indicates that the generator output would be operated at any setting above 13.6 MW (Ref. 1d).</p> <p>Thus, in order to ensure that natural gas is not used to increase the thermal output and hence the profitability as well as the environmental footprint of the plant, it is important that the Community be able to monitor the actual amounts of MW being generated.</p> <p>For this reason, the Communication Plan must contain details of the actual electrical production</p>	<p>waste received and rejected by the facility.</p> <p>All documents required to be submitted to the Ministry of Environment will form part of the public record. The public record file can be accessed by the public through the MOE Regional Director, the MOE District Manager, The Regional Municipal Clerks in Durham and York Regions and the Energy From Waste Advisory Committee in accordance with EA Condition 3. In addition all documents are posted to the project website in accordance with EA Condition 7.4 and will be accessible at the facility Visitors Centre in accordance with Certificate of Approval Condition 16, once construction is complete and the facility opens to the public.</p>

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		<p>being generated and as well as of that portion that is sold to the Grid.</p> <p>IV. The Natural Gas Requirements</p> <p>The E.A. has used a feedstock combustibility value (HHV) of 13 MJ/kg, within a range of 11.0 to 15 0 MJ/kg (Ref. 2a). This HHV was deemed sufficient to maintain combustion without the adjunct of natural gas.</p> <p>However, the E.A. states that the consumption of natural gas will at times be required as an auxiliary fuel during the “Brief” periods of facility start-up and shut-down phases (Ref. 2b). The word “Brief” is not quantitatively defined and consequently, the extent of these periods where natural gas will be used is not defined. This stems in part from a lack of a quantitative definition of terms that have a subjective interpretation. As discussed below, the Communication Plan should see to alleviate the use of ambiguous terms and concepts.</p> <p>The Client’s request outlined in the RFP is somewhat more precise, in that it says that “During any operating year, firing of the auxiliary burners shall <u>not account for more than 10% of the annual heat input to all boilers, including burner operation during furnace start ups and shut down</u>”. (Ref. 2c).</p> <p>This actually corresponds to no more than 36.5 days/yr or 876 hours/yr where the use of natural gas would be permitted, irrespective of the volume of such gas used.</p> <p>These values being stated in the E.A., they should be considered as the upper limit for the permissible duration of natural gas being used as a supplementary fuel for the Incinerator.</p> <p>This is a factor that the Communication Plan should clearly address and the way to do so is discussed below.</p> <p>As a matter of interest, it is stated that natural gas will also be required for the APC equipment. Unfortunately, a quantitative breakdown for this has not been provided in the E.A. and consequently, the Communication Plan will need to distinguish between the natural gas requirements for the boilers and those for the APC. The overall natural gas requirements have been estimated, for a plant capacity of 250k Tonnes/year, at 10,200 m3/hr at 415 KP (6000 ft3/min at 60 psi).</p> <p><u>V. The Handling of Hazardous and Unacceptable Waste</u></p> <p>The expressions “Hazardous Waste and “Unacceptable Waste” are found within the E.A. (Ref. 3a). Both of these types of waste should not be run through the incinerator, but this is so because of different reasons...</p> <ul style="list-style-type: none"> • “Hazardous Waste” refers to waste that, if incinerated, will adversely affect the local environment – this is of concern to local populations; • “Unacceptable Waste” refers to waste that could possibly damage the burner – this is of concern to the Incinerator owner and operator. 	

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		<p>Given that both of these types of waste are to be excluded from incineration, the Communication Plan should indicate the respective daily quantities of such wastes that have been detected in the tipping floor area and thus, excluded from incineration.</p> <p>It is recognized however that this type of detection is not absolute, as it will allow an unspecified quantity of either types of waste to find its way into the Combustion Chamber and hence, in the Environment.</p> <p><u>VI. Need for Quantifiable Objective Definitions</u></p> <p>Terms such as incineration process “Start-Up” and “Shut-Down” are highly subjective and they must not be left to subjective interpretation.</p> <p>They must be clearly defined in quantifiable terms, as part of the Communication Plan, and they must reflect realistic conditions.</p> <p>It is <u>suggested</u> that these periods be defined as follows:</p> <ul style="list-style-type: none"> • the incineration process “Start-Up” phase not to exceed <u>6 hours</u>; • the incineration process “Shut-Down” phase not to exceed <u>24 hours</u>; • any “Shut-Down” within 30 calendar days of a “Start-Up” will be considered as an anomaly in terms of permissible natural gas usage. <p>This will avoid that the system be ascribed to be in an extended state of perturbed operations – something that could possibly warrant the prolonged use of natural gas to promote combustion and increase the thermal output (and hence, the electricity generating capacity).</p> <p><u>VII. The Communication Requirements</u></p> <p>In light of the above, the Communication Plan should document, on at least an <u>hourly basis</u> and using as much as possible <u>automated data-logging techniques</u>, the following information...</p> <p>a. the <u>Electrical Output being Generated...</u></p> <ul style="list-style-type: none"> • the hourly-average MW electrical production, both raw-generated and net-sold to the Grid; • the maximum and minimum MW values, both raw-generated and net-sold to the Grid; • the hourly MW*hr electrical production sold to the Grid; • the cumulative daily, weekly and year-to-date MW*hr electrical production sold to the Grid. <p>b. the <u>Natural Gas Volumes (m3) and Duration used by the Incinerator in terms of...</u></p> <ul style="list-style-type: none"> • raw input from Enbridge; • hourly volume (m3) required for feed to the boilers; • hourly volume (m3) required for feed to the APC; • time record (using 24 hr time format) for any change in gas flow to the boilers; 	

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		<ul style="list-style-type: none"> • the cumulative daily, weekly and year-to-date natural gas volume to the boilers. <p>c) the <u>Handling of Hazardous and Unacceptable Waste...</u></p> <p>For waste that is deemed either “Hazardous” or “Unacceptable” and that is detected and retrieved from the incineration stream, the Communication Plan should record, for each type of such waste...</p> <ul style="list-style-type: none"> • day and date of Incident (using ISO yyyy-mm-dd format); • license plate Number and Identification of Waste Delivery Truck; • batch Number of Waste Load; • the Point of Origin of such Load; • the Tonnage of such Load; • quantity (number) of Item(s) Identified; • brief Description of Item(s); • estimated Mass of Item(s) (Kg); • the cumulative daily, weekly and year-to-date of such waste retrieved. <p><u>VIII. Conclusion</u></p> <p>The Communication Plan will be a valid tool to allow the Community to properly oversee the Incinerator plant.</p> <p>Hence it is important that such a Communication Plan capture as completely as possible plant information that is of interest to the Community.</p> <p>Moreover, for such a Plan to be useful, its information must be made public in a timely manner.</p> <p>In particular, the Internet should be used to achieve this goal and to minimize the time lag in the dissemination of information. Ideally, such information should be provided within 8 hours of data capture.</p> <p>In addition, this information should be used for data archival purposes, as well as to produce hard-copy executive reports when required.</p>	
12	03/30/2013 Part B	<p><u>I. Introduction</u></p> <p>This submission is a <u>Supplement</u> to the previously submitted comments(Part A) relative to the Community Communication Plan for the Durham Incinerator Project and that addressed the issues of...</p> <ul style="list-style-type: none"> ○ the <u>Electrical Output</u>; ○ the <u>Natural Gas Requirements</u>; ○ the <u>Handling of Hazardous and Unacceptable Waste</u>. <p>This Supplement deals with the importance of instituting a policy of full disclosure in the Community Communication Plan, including clearly defining in quantitative terms the two critical phases of “Start-</p>	<p>The purpose of this Plan as defined by Condition 7.3 is to define how information is disseminated; how the public and aboriginal communities will be notified; and the procedures for keeping interested parties informed (refer to Condition 7.3 a, b c). This Plan identifies the intended audience and what method/media/venues will be utilized to reach the audience. Additionally Condition 7.4 defines what types of information should be made available to the public through a website or other means which the Regions have continually maintained. The details on the specific reports and information to be disseminated are defined separately by the EA and CofA documents or the Project Agreement (PA). It is not the intent of this Plan to provide specific details on what information is reported or how it is expressed, as this will vary according to the audience. As with all the Region’s public facilities, clear, concise, factual and timely information must be provided to satisfy the EA, CofA and any regulatory requirements.</p>

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		<p>Up” and “Shut-Down”.</p> <p>To do otherwise would NOT lead to a Community Communication Plan, but to a rather biased, if not outright unethical, marketing tool for Incineration.</p> <p>Thus, the Community Communication Plan must fully reveal the full extent of the emissions emanating from the plant, under ALL operating conditions, including transients and anomalies.</p> <p><u>II. Full Disclosure</u></p> <p>The Region intends to do a selective release of data, possibly for no other reason that uncensored information could possibly be damaging for the “Image” of Incineration. In particular, it has made it abundantly clear that it does NOT intend to release emission data during the “Start-Up” and the “Shut-Down” phases of the operations.</p> <p>Unfortunately, under such a scenario, hiding the data from public scrutiny will not avoid the health consequences and will not prevent the fact that unhealthy situations are occurring.</p> <p>If it were to follow through with its intent, the Region would show that it is valuing more certain special interests than the health of its citizens. As such, this is unacceptable.</p> <p>In addition, the Communication Plan that has been mandated by the Minister would be more of a Marketing Document than a Communication Plan.</p> <p>The Communication Plan must be an intellectually honest document that represents the reality of the Operation as it is, not under optimal steady-state conditions. It must fully inform those most affected by the Incinerator, namely the members of the Community.</p> <p><u>III. Critical Phases</u></p> <p>Given that the “Start-Up” and the “Shut-Down” phases of the operations have never been quantitatively defined, the extent of the “Black-Out” that the Region could impose on the Data would be extremely subjective.</p> <p>Moreover, arbitrary phases of the Operation could be arbitrarily invoked to be either part of an extended “Start-Up” or “Shut-Down” in order to prevent release of possibly embarrassing information.</p> <p>A proper Communication Plan cannot be developed under these circumstances.</p> <p>Both the “Start-Up” and “Shut-Down” are critical phases of the operation where there is most likely to be exceedance in emission levels and, by extension, the most significant potentially adverse health consequences.</p> <p>The intent by the Region not to release emission data at these most critical stages of the operation</p>	

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		<p>is totally contrary to the objectives of a Communication Plan that is respectful of the Minister’s intent.</p> <p><u>IV. Quantification</u></p> <p>Thus, ALL emission releases should be made available.</p> <p>The Communication Plan should reflect the open availability of the emission data and its effectiveness; this document should not be interfered with by selective mitigation by the Region.</p> <p>In addition, it will be important to develop a quantitative definition for the “Start-Up” and “Shut-Down” conditions. This will avoid subjective and arbitrary interpretations for these aspects of the operation – something that would find its way in the proposed Communication Plan.</p> <p>For this reason, it was <u>suggested</u> in the prior release of this document that these periods should be defined as follows:</p> <ul style="list-style-type: none"> • the incineration process “Start-Up” phase should not to exceed <u>6 hours</u>; • the incineration process “Shut-Down” phase should not to exceed <u>24 hours</u>; • any “Shut-Down” within 30 calendar days of a “Start-Up” will be considered as an anomaly where possible performance guarantees do apply. <p>Thus, the Communication Plan would cover all aspects of the operation.</p> <p>Furthermore, the disclosure of this information within the identified phases of “Start-Up” and “Shut-Down” would have no financial implications for the operator as emissions then occurring would be excluded from the performance guarantees.</p> <p><u>V. Recommendation</u></p> <p>The Communication Plan will only be a partial Communication Plan unless it addresses the issue of full Disclosure.</p> <p>In order to fulfill its function of properly informing the Community, it must necessarily contain <u>ALL</u> information, even in the worst case conditions, and in a timely manner.</p> <p>The information required by the Community must not be compromised and can be provided without the operator incurring financial performance penalties.</p>	
13	03/29/2013	<p><u>Project Background</u></p> <p>Durham and York are the proponents for the Environmental Assessment “undertaking” i.e., the owners of the incinerator under construction in Courtice and as owners are legally responsible for ensuring that Conditions of EA approval and the Environmental Compliance Approvals (formerly called Certificates of Approval) are met.</p> <p>The draft CPP is supposed to set out and guide the OWNERS’ communications with their residents</p>	

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		<p>and stakeholders around the undertaking i.e. the incinerator.</p> <p>Covanta Energy Corp is the design/build/operator of the incinerator and entered into a project agreement with the two Regions, signed Nov. 2010. See: http://www.durhamenvironmentwatch.org/RegionReports/DurhamYorkCovantaProjectAgt.pdf</p> <p>GENERAL CONCERN: -CCP must set out planned communication between the incinerator proponents and owners (Durham and York Regions) and residents.</p> <p>In response to questions by the 3 public EFW AC members at the EFW AC meeting in October 2012, it emerged that the draft CPP had been prepared by Durham-York project team members and communications staff from the regions AND input had been provided by Covanta, the incinerator operator. As per the last bullet on page 21, Covanta, the DBO is to prepare their own separate communications plan in accordance with the Project Agreement.</p> <p>This is completely inappropriate as the owners (Durham and York Regions) and the operator (Covanta) have different roles and responsibilities and may have competing objectives. Furthermore, the Owners are supposed to provide oversight over the operator, separate from any MoE oversight.</p> <p>With the input of Covanta and the objectives of Durham and York not related to EA Condition 7, the CCP has morphed into a public relations document that repeatedly attempts to convince readers that incineration is a safe and acceptable form of waste disposal assumptions are debatable. That type of opinion and corporate communications propaganda has no place in a CPP to fulfill EA Condition 7.</p> <hr/> <p><u>DRAFT COMMENTS RE CONCERNS IN ORDER THEY APPEAR IN DRAFT CPP</u></p> <p>Page 3 –Glossary</p> <p>The definition for the word “Undertaking” must be provided in the Glossary. The undertaking is the Durham-York Waste incinerator, or as the Regions’ call it, the Durham York Energy Centre.</p> <hr/> <p><u>Sec. 2 – Purpose</u></p> <p>The purpose of the CCP is to communicate factual information about the Regions’ residents about the incinerator project – i.e. the undertaking as per Condition 7.</p> <p>How it may or may not fit into other plans or objectives is completely irrelevant to its purpose and objectives and subjective opinions at best and have no place in this document.</p> <p>The diagrams and text about partnerships, plans and economy in the third paragraph should be deleted in their entirety.</p>	<p>As the contractor responsible for the design, construction, and operation of the facility, Covanta is an important stakeholder that should be consulted on all submissions related to the facility.</p> <p>As a contractor to the Regions, clear differences between the Regions’ communication plans and Covanta’s corporate communication plans will be set. The Region included Covanta in the review of this plan to ensure Covanta clearly understands the requirements of the Owner’s communication plans/objectives and those of Covanta’s corporate plan. Covanta’s corporate communication plan will require oversight by the Owner’s to ensure compliance with the Project Agreement and are outside of the scope of the Regions’ EA Condition 7 communications plan requirements.</p> <hr/> <p>The definition of the word “undertaking” has been included:</p> <p>“As defined by the Ministry of Environment in the Environmental Assessment Notice of Approval To Proceed With The Undertaking, “undertaking” means the construction and operation of a thermal treatment waste management facility on the site, as set out in the environmental assessment.”</p> <hr/> <p>A statement about how this plan connects or identifies with the Strategic Plans of the Regions was at the suggestion of the MOE in consultation for the Community Communications Plan.</p>

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		<p>Section 3.0. Background</p> <p>This section must ALSO advise that incinerator commissioning period will begin in March 2014. The Region has already received inquiries where writers indicate they will to sell their homes and move away from the community. The Project Team staff have only advised those asking of the fall 2014 start of operations. The CCP must show that commissioning operations would begin much earlier i.e. March 2014 so that they could take whatever actions they deem appropriate, including selling their homes.</p> <hr/> <p>Sec. 4 – Communications Objectives</p> <p>CCP has as its objectives to meet the requirements of EA Condition 7. The objective is to communicate factual information about the Regions’ residents about the incinerator project – i.e. the undertaking.</p> <p>Political messaging or “opinions” about incineration and/ or sales pitches by Covanta about their company have NO place in the CCP and should be deleted entirely.</p> <hr/> <p>Sec. 5.0 Key Messages</p> <p>The key messages in the six bullets are vague, use subjective terms and discuss objectives that go far beyond communication commitments that should be addressed in Condition 7. The CCP is not the document where the Regions should peddle their opinions.</p> <p>The key message should be that the Regions COMMIT to communicating factually correct information that various Conditions of EA and ECA Approval require to residents and stakeholders accurately and in timely manner. The Project Team should opt to include additional information as set out in my comments in subsequent sections.</p> <p>Bullet one – what do the terms “modern” EFW and “inclusive monitoring” mean? These meaningless and at best highly subjective terms and have no place in the CCP as they do not convey meaningful or factual information.</p> <p>Bullet two – Durham and York are dedicated to ensuring the safety of human health and the environment, with no statements in the CCP that would describe how they would do that.</p> <p>Bullet three- talks about the Regions’ diversion programs. That is completely outside the undertaking, which is the incinerator. The waste plans of the two regions are NOT the undertaking.</p>	<p>As described in the Draft Communications Plan Section 12: Schedule of Public Meetings, the Regions plan to hold a public meeting prior to receipt of waste in the spring of 2014 revised from Fall of 2013. At this time public will be advised of the status of the facility and commissioning.</p> <p>The meeting will be scheduled as required by EA Condition 7.5 (b) prior to the receipt of waste. Notice will be given a minimum 15 days prior to the meeting as required by EA Condition 7.6.</p> <hr/> <p>The Regions commitment to providing factual information is listed under Sec. 4.0 of the Plan: Communication Objectives and is what is listed as a requirement in EA Condition 7.</p> <hr/> <p>Bullet 1 Revised to the following: “<i>The Regional Municipalities of Durham and York are committed to building and operating an EFW facility with an environmental monitoring program that will meet the MOE’s stringent new A-7 Guidelines.</i>”</p> <p>Bullet 2 Revised to the following: “<i>The Regional Municipalities of Durham and York are dedicated to ensuring the safety and protection of human health and the natural environment by strictly monitoring facility compliance with the Ministry of Environment EA and CofA Conditions throughout the life of the facility.</i>”</p> <p>The Regions commitment to waste diversion in the EA submission was commended by the Minister of Environment in his letter to the Regions with the EA Approval dated November 19, 2010 and has and will continue to play a role in the undertaking. EA Condition 10 Waste Diversion, requires the Regions to ensure</p>

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		<p>Bullet four – Diversion and recovery through energy from waste technologies are compatible and not competitive. This bullet must be deleted as it is beyond the undertaking. Furthermore it is a purely subjective opinion, with no data provided to back that assertion up. It is the language of the sales pitch employed the incinerator industry and their supporters to promote and sell incinerators.</p> <p>Bullet five –The success of the Regions’ waste programs is not part of the undertaking and should be deleted from the CCP as should any reference to the “4Rs” in the CCP.</p> <p>There are other waste education plans and documents where such matters could be discussed in factual terms.</p> <p>Bullet six – objective could be a relevant objective as per Condition 7 if the Regions spelled out how they would achieve that in the CCP. The CCP does not sufficiently describe the type of information and level of details that would be communicated to residents, including on matters likely to be of most interest including but not limited to: monitoring results, emissions exceedances, operational problems , project capital and operations cost increases, change in ownership, work stoppages due to strikes etc.</p> <hr/> <p><u>6.0 – Audiences</u></p> <p>The list of target audiences for the CCP includes local schools largely because the CCP discusses the Regions’ waste education program, which as described in the CCP is highly subjective, verging on propaganda selling the “4Rs” – which is NOT Ontario waste policy and promoting incineration. NOTHING in EA Condition 7 contemplates including this type of activity in the CCP.</p> <p>If schools are to remain a target audience and shown as such in the CCP, then any material provided to schools relating the CCP must be strictly factual reporting of information as would be communicated to Durham residents but in an age appropriate fashion if the material was destined for students themselves.</p> <hr/> <p>Sec. 7.0 –Stakeholder Consultation and Forums</p>	<p>waste diversion programs etc are being met.</p> <p><i>It is a goal of the Regions to prove that EFW and waste diversion are compatible. If there were not enough studies to confirm this during the Environmental Assessment Study, EFW would not have been considered as a long term waste disposal solution. This point has been deleted.</i></p> <p>The Regions will continue to communicate the importance of their award winning waste diversion programs, where materials that are recyclable or reusable are removed from the waste stream before reaching the EFW facility. The EFW facility compliments these programs by allowing for recovery of energy and metals from material that is otherwise non-recyclable. In addition, as part of our integrated waste management hierarchy, introducing Recovery as the 4th R will be included as it relates to Energy Recovery and Metal Recovery from the EFW process.</p> <p>School Outreach - Durham's waste education program is based upon a "request" only basis, hence, if a school or Board makes a request they are considered an “Interested Party”. As with our current School Outreach program any presentation or information exchange is tailored to the school board, teacher, instructor or professor who makes the request and is subject to their review and approval.</p> <p>Bullet 6 revised to: <i>“The Regional Municipalities of Durham and York are dedicated to communicating, informing and engaging residents, Aboriginal communities, other interested members of the public and agencies on the EFW facility throughout the design, construction and operation phases by presenting factual facility information through the project website, at the facility Visitors Centre, through advisory committees, Regional Committees and Council in addition to diversion programs and waste management facilities”</i></p> <hr/> <p>The Regions will continue to communicate the importance of their award winning waste diversion programs, where materials that are recyclable or reusable are removed from the waste stream before reaching the EFW facility. The EFW facility compliments these programs by allowing for recovery of energy and metals from material that is otherwise non-recyclable. In addition, as part of our integrated waste management hierarchy, introducing Recovery as the 4th R will be included as it relates to Energy Recovery and Metal Recovery from the EFW process.</p>

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		<p>What is not shown in this section and should be included as a method of communication is a project email list. During the EA Study, the Project Team for the two Regions compiled a Project Email list. This list has not been used to communicate project information to interested parties since some time in 2009-possibly early 2010.</p> <p>This email project list should be updated and the Project Team must invite interested parties to add their names to the email list so they could also get project information and communications required by the CCP via email, including notices of project documents released and/or posted to websites and to advise of emissions exceedances and/or any event that could adversely impact public safety, human health and the natural environment and any changes to the project including changes to scope, ownership, changes to monitoring plans or reporting etc.</p> <p>Page 8 – schools – only activities contemplated by Condition 7 should be shown as this might relate to schools. In particular, things like school tours to the incinerator have no place in the CCP.</p> <hr/> <p>Sec. 7.2 – Advisory Committees</p> <p>The two advisory committees i.e. EFW AC and EFW WMAC have terms of reference to guide the committee which are posted to the project website.</p> <p>Sec. 7.2 states.....<i>These two committees will support ongoing consultation efforts of the Regions by promoting waste management initiatives including the EFW Facility.....</i></p> <p>NEITHER of the two EFW committees has “promotion” of EFW in its mandate. In fact both committees play a role in bringing forward concerns about a wide range of issues relating to the EFW to the attention of the Project Team. The sentence above should be deleted from the CCP altogether.</p> <p>Sec. 7.2.1 – EFW AC</p> <p>The last paragraph of this section talks about how often EFW AC meetings are held. What is written MAY be the Project Team’s preference for meeting frequency however this had not been decided. Determining meeting frequency is a committee function, not solely that of the Project Team. Quarterly meetings are scheduled for 2013 and this should be noted in the CCP as well as that the meeting schedule is to be determined by the EFW AC members.</p> <p>This section must be amended to reflect EA Conditions 8.9. and 8.10. Furthermore, it must be noted that the EFW AC Terms of Reference was imposed by the Project Team and does not necessarily reflect the views of EFW AC members and this includes frequency of meetings. This item will be discussed by the EFW AC at one of the upcoming meetings.</p> <hr/> <p>So that the public is clear on the Terms of Reference that guides the activities of both committees, the links to the Terms of Reference for both committees should be included in the CCP.</p>	<p>The public registry during the EA process concluded with the MOE acceptance of the EA. The Regions are now in the process of establishing a new registry at the commencement of facility operations, where interested parties can subscribe or unsubscribe should they choose, on the project website to receive email notification of new postings to the website. Currently interested parties are directed to particular areas of the project website where they can find what they are looking for and more all in one location. There is an archived section and a What’s New tab, where all the information on plans and reports can be found. There is also a Contact tab where project team can be emailed for assistance or other purposes</p> <hr/> <p>Wording has been revised: <i>“Two advisory committees have been struck since the EA Approval. These two committees will support the ongoing consultation efforts of the Regions in accordance with their individual Terms of Reference”.</i></p> <hr/> <p>Wording has been revised to: <i>“During construction, committee meetings are event or milestone driven and called by the Project Team or made at the request of members.”</i> After initial start-up of the facility the committee shall meet on an annual basis or as otherwise approved by the EFWAC membership.</p> <hr/> <p>Revised: The links for the Terms of Reference for both EFWAC and EFW-WMAC will be included in the CPP.</p>

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		<p>EFW AC: http://www.durhamyorkwaste.ca/pdfs/project/EFWAC/Meeting_1/012011-4.pdf</p> <p>EFW WMAC: http://www.durhamyorkwaste.ca/pdfs/project/ToR03282012.pdf</p> <hr/> <p>Section 8.0 Communications Methods and Tools</p> <p>Section 8.1 – DY Energy Visitors Centre</p> <p>There is nothing in this section showing how the Visitors’ Centre activity relates to the requirements of Condition 7.</p> <p>This may be the location where Covanta and/or the Region conduct their own separate “education programs which have nothing to do with the requirements of Condition 7.</p> <p>Bullets at the bottom of page 13 refer to indoor and outdoor learning spaces.</p> <p>What steps would be taken to protect visitors from adverse impacts related to incinerator operations including but not limited to emissions, dangerous material etc.?</p> <p>Would hands-on interactive exhibits area be supervised by qualified and trained staff?</p> <p>Would tours be guided by a professional who would provide factual information only – i.e. no sales pitch for incineration or Covanta? E.g. numbers around potential electricity production are variable and possibly inflated. Only factual and substantiated information should be conveyed to the public.</p> <p>Would this be a Covanta employee or an employee of the owners?</p> <p>At no time should any Regional employee be pushing the 4Rs or incineration if the communication is related to the requirements of Condition 7.</p> <hr/> <p>Sec. 8.2 – School Programs</p> <p>What is described in this section are the existing and planned “waste education” programs of the two regions that are completely separate from requirements of Condition 7 and therefore this has no place in the CCP. This section should be deleted in its entirety.</p> <p>At no time should any Regional employee be promoting the “4Rs” or incineration other than factual information related to operations and related, as per the requirements of Condition 7.</p> <hr/> <p>Sec. 8.3 –Public Education and Community Outreach</p>	<p>The Visitors Centre is a location where the Regions will hold presentations to the defined audiences in this plan, should they request one, and explain any part of the integrated waste management programs and Waste Diversion initiatives as required by EA Condition 10: Waste Diversion. The Plan has been revised to reflect that the Visitors Centre is a venue where facility documents related to the EA and CofA can be viewed if requested by the public or interested party in accordance with CofA Condition 16(2).</p> <p>Visitors to any Regional facility will be required to abide by all site specific safety requirements and will be provided with the required personal protection equipment. All visitors will be signed in and escorted at all times by trained facility staff.</p> <p>Depending on the nature of the request, either the Regions or Covanta will host tours of the facility. As the Owner of the facility, the Regions have the right to accept, refuse, monitor or accompany any request.</p> <p>The Regions will continue to communicate the importance of their award winning waste diversion programs, where materials that are recyclable or reusable are removed from the waste stream before reaching the EFW facility. The EFW facility compliments these programs by allowing for recovery of energy and metals from material that is otherwise non-recyclable. In addition, as part of our integrated waste management hierarchy, introducing Recovery as the 4th R will be included as it relates to Energy Recovery and Metal Recovery from the EFW process.</p> <hr/> <p>School Outreach - Durham's waste education program is based upon a "request" only basis, hence, if a school or Board makes a request they are considered an “Interested Party”. As with our current School Outreach program any presentation or information exchange is tailored to the school board, teacher, instructor or professor who makes the request and is subject to their review and approval.</p> <hr/> <p>Waste Department event details are tailored to the specific event. Where appropriate, specific information on the EFW will be provided and as with any regional event requests for information outside the scope of the event or of a more</p>

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		<p>Outreach and education should convey information about the undertaking only i.e. the incinerator, as per EA Condition 7.</p> <p>The CCP is NOT a marketing document to “sell or promote” the incinerator, or to convey the Regions’ “opinions or political positions” around incineration. Rather, the CCP is a document that should convey factual information about the incinerator including operations matters as per EA Condition 7.</p> <p>Sec. 8.3.1 - Events</p> <p>The events listed in Section 8.3.1 should be listed only where these convey information about the incinerator and operations. Information about the incinerator should be available at these events e.g. information about most current annual report which should include monitoring results and summary of operational issues and as well as information about any planned changes to the project.</p> <hr/> <p>Sec. 8.3.2 – Advertising</p> <p>The Regions’ should update and use the project email list developed during the EA to convey information about the incinerator as required by EA Condition 7. Those on the project list clearly indicated an interest in the Project. The public should be invited to be added to the email list so they would receive future project related information via this format, as a minimum.</p> <p>The content of advertisements and/or any Newsletter should contain factual information only related to the incinerator and should not in any way be viewed as vehicle to “promote” or advertise the Regions’ political positions around incineration.</p> <hr/> <p>In the past, the Project Team staff had committed to inserting advertisements but have not always followed through. E.g. Senior Project Team staff promised to place two advertisements so the public would be aware of the CCP yet it appears they failed to provide evidence those advertisements were actually placed. Both MoE and Regional Councils will need to exercise their oversight functions to ensure that the Project Team not only keeps commitments but carries these out appropriately and as envisioned by EA Condition 7 and any other conditions set out in the EA and ECA approvals.</p>	<p>specific nature will be directed to the facility and or Region website.</p> <hr/> <p>The public registry during the EA process concluded with the MOE acceptance of the EA. The Regions are now in the process of establishing a new registry at the commencement of facility operations, where interested parties can subscribe or unsubscribe should they choose, on the project website to receive email notification of new postings to the website. Currently interested parties are directed to particular areas of the project website where they can find what they are looking for and more all in one location. There is an archived section and a What’s New tab, where all the information on plans and reports can be found. There is also a Contact tab where project team can be emailed for assistance or other purposes.</p> <hr/> <p>The draft Community Communications Plan was posted and open for public consultation on the project website in October 2012. Residents who wanted to comment had six months to do so. In total 21 comments were submitted on the Draft Community Communications Plan. A public service announcement (PSA) was issued to all local media on January 16, 2013 reminding the public that the comment period ha been extended to March 30, 2013. York Region communications issued their own PSA to the media on January 17, 2013. The PSA was also posted on both regional municipality’s websites and the project website. The PSA was re-issued to local media on February 20 as an additional reminder of the public comment period. The PSA was sent out again as a final reminder on Mar. 13. These PSAs generated the following coverage from various local media outlets:</p> <p>Metroland Media Newspapers - March 18. Durham Radio News - Jan. 16 The Oshawa Express - Jan. 23 and Feb. 20. The Scugog Standard - Mar. 21. The Durham Citizen - Feb. 21.</p> <p>Residents were also advised of the DYEC draft Community Communications Plan</p>

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		<p>Sec. 8.4 – Media Relations</p> <p>All information supplied to the media should be factual and not in any way promote incineration or convey the Regions’ opinions about incinerator or political positions around same. The Regions must communicate accurate and verifiable information. At times rosy numbers about potential electricity production of the incinerator have been found in media articles. Information about the number of homes supposedly powered by those amounts is subjective and variable and has no place in the CPP.</p> <p>In future, only the power production numbers based on actual operations and as reported in annual reports should be communicated and for greater accuracy, the amount of natural gas used over reporting period should be provided.</p> <p>The Project Team should ensure that all media contacts are advised of the release of the most current Annual Report which should contain all information set out in CoA Condition 15.</p> <p>Furthermore, all media should be advised when there are exceedances of operational limits that result in MoE ordered action, and/or in forced shutdowns as well of any on-site emergency.</p> <hr/> <p>Sec 8.5 – Websites</p> <p>Durham Region does an erratic job of updating their project website, which is not easy for occasional users to navigate and it is not searchable. It is evident that little thought has gone into making the site user friendly.</p> <p>A “search” feature should be added and more tabs/headers would help to make material easier to find.</p> <p>A main page link should go directly to the current CCP and the most current Annual Report . All previous CPP versions and annual reports and related should be archived on the project website.</p> <p>The current “Links” page http://www.durhamyorkwaste.ca/project/links.htm should link to related sites but NOT to what are primarily “pro incineration” material –this is not the place to promote incineration in any form.. The select news articles currently posted do not provide a balanced view of incineration and unless pros and cons of incineration are fairly depicted, those</p>	<p>through a paid advertisement for the Energy from Waste – Waste Management Advisory Committee placed in all Metroland community newspapers across Durham Region on Jan. 30, 2013. In addition, social media messages were posted on the Region's social media sites (Facebook and Twitter) along with a direct link to the Community Communications Plan from January through March 2013. These advertisements are posted on the project website at the following link: http://durhamyorkwaste.ca/project/media.htm</p> <hr/> <p>The Regions commitment to providing factual information is listed under Sec. 4.0 of the Plan: Communication Objectives and is what is listed as a requirement in EA Condition 7.</p> <hr/> <p>The website has a contact email address if users frequent or occasional need assistance in finding advertisements, recent reports, and current agendas. To date we have not received any complaints through the project email by any user that they cannot find information.</p> <p>There is an archived section and a What’s New tab, where all the information on each plan and their respective reports can be found. There is also a Contact tab where project team can be emailed for assistance or other purposes.</p>

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		<p>articles should be removed – e.g. Themelis article.</p> <hr/> <p>ALL material directed at children should include only factual material from independent sources.</p> <hr/> <p>Draft meeting minutes for the EFW AC and EFW WMAC should be posted as soon as they are available, noting they are in draft and subject to change. A commitment to provide draft EFW AC minutes within two weeks of a meeting has rarely been met and MoE and Regional Councils must ensure that project team staff follow through on commitments.</p> <hr/> <p><u>Sec. 9 DYEC Complaint Protocol</u></p> <p>Project Team responses to some complaints has been inadequate and could be construed as being misleading – see Dec. 2012. When people asked when the incinerator would begin operations, staff indicated fall 2014 when they would know that the facility would begin receiving waste and begin commissioning in March 2014. It is especially important when people indicate they wish to sell their homes and move before the incinerator begins operations. Improper and inadequate responses could cause financial and other harm to Durham residents. There are studies that show there can be drops in property values in the areas of incinerators or power plants.</p> <p>MoE and Council must ensure that the Project Team staff provide sufficient information to those making inquiries and complaints and that staff respond in a timely manner.</p> <hr/> <p>The Complaint page should also indicate how the public could communicate with incinerator owners i.e. the two Regional Councils and the Host Community Council.. Addresses for the Clerks of both regions and Clarington should be provided in addition to those shown on page 19 of the draft CPP.</p> <hr/> <p><u>Sec. 10 – Communication Measurement, Evaluation and Feedback</u></p> <p>The bullets should be numbered so these can be easily referenced if required.</p> <p>Bullet one is completely irrelevant and inappropriate. The success of the Regions’ Diversion Programs is NOT related to the perceived effectiveness of the CCP with is to communicate information around the incinerator as per EA condition 7.</p> <p>Staff have separate education and communications plans about the Regions’ diversion programs.</p> <p>Information about the Regions’ Diversion Programs will be contained in an annual report on same</p>	<p>School Outreach - Durham's waste education program is based upon a "request" only basis, hence, if a school or Board makes a request they are considered an "Interested Party". As with our current School Outreach program any presentation or information exchange is tailored to the school board, teacher, instructor or professor who makes the request and is subject to their review and approval.</p> <hr/> <p>Minute posting for committees is laid out in their respective Terms of Reference and is dealt with through the committees and is outside the scope of EA Condition 7.</p> <hr/> <p>As described in the Draft Communications Plan Section 12: Schedule of Public Meetings, the Regions plan to hold a public meeting prior to receipt of waste in the spring of 2014 revised from Fall of 2013. At this time public will be advised of the status of the facility and commissioning.</p> <p>The meeting will be scheduled as required by EA Condition 7.5 (b) prior to the receipt of waste. Notice will be given a minimum 15 days prior to the meeting as required by EA Condition 7.6.</p> <hr/> <p>After Construction is complete and the facility is operational, Phase 2 of the Complaints Procedure commences and the DBO, Covanta, becomes the first responder. Covanta staff have not yet been hired to address complaints as this facility is not yet constructed. Once this occurs contact information will be communicated through any number of media outlets listed in the Communications Plan. Currently all complaints/inquiries are dealt with by the Regions.</p> <hr/> <p>Revision: bullets to numbers.</p> <p>The Regions commitment to Waste diversion in the EA submission was commended by the Minister of Environment in his letter to the Regions with the EA Approval dated November 19, 2010 and has and will continue to play a role fundamental in the undertaking. EA Condition 10 Waste Diversion requires the Regions to ensure waste diversion programs etc are being met.</p>

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		<p>as per EA Condition 10. Durham Region also puts out an Annual Waste Management Report – the last one is for 2012.</p> <p>Bullet 5 – monitoring frequency of complaints management process – this should also occur on a weekly basis not just during construction but also for the duration of facility commissioning and for at least the first year of operations in addition to what would be required by MoE.</p> <p>The required summary of complaints and inquiries as per C of A condition 15 (k) could provide some information and indicate whether or not people are receiving, understanding the content of the Regions’ communications around the incinerator.</p> <p>A link to the Complaint Protocol and Complaints Log should be accessible from main page of the project website and be available on a clearly identifiable separate tab.</p> <p>Bullet 8 – This section confirms that both the EFW AC and EFW WMAC act in an advisory capacity to Durham and York Regional Council and MoE. Durham Region’s Chair Anderson recently made some exceptionally uninformed comments, asserting that the EFW WMAC is NOT an advisory committee to council. Two years of numerous attempts by citizens to explain the mandate of both committees and the differences between the two committees, have clearly not sunk in though Chair Anderson’s first clue should have been that the word “advisory” is in the title of both committees. See Chair Anderson’s comments in:</p> <p>http://www.durhamregion.com/news/article/1594151--clarington-incinerator-committee-role-questioned</p> <p>The Project Team staff should ensure that they educate both the public and the incinerator owners, i.e. the two Regional Councils, about the role and activities of both committees.</p> <p>Bullet 9 references EFW AC and EFW WMAC Annual Reports. Though questions were asked about this process, EFW AC annual reports have been produced by Project Team staff with no input requested from EFW AC members. In fact Project Team staff reported they use a template they developed.</p> <p>Either the wording in this section should be amended to reflect that in fact the EFW AC do NOT produce such a report, and that Project Team staff develop a report without the input of the EFW AC members, then this section should be deleted altogether as it refers to the EFW AC.</p> <p>Re EFW WMAC, the chair and vice chair made oral presentations to both Durham Works Committee and Clarington Council in November/December 2012 – this was essentially their first annual report and this and future reports should be posted and on the EFW WMAC tab - http://www.durhamyorkwaste.ca/project/liaison-committee.htm .</p> <p>Bullet 11 – waste education to educational institutions has no place in the CCP, other than to indicate that educational institutions will be made aware of the CCP and type of information it contains. The Regions’ waste education programs are completely separate from the CPP</p>	<p>The project web email and call centre are managed on a daily basis for responses to enquiries and reported as required by the MOE.</p> <p>Monthly Complaint Logs are provided electronically to all EFWAC members and the MOE and are also made available on the project website and will continue in accordance with the Complaint Protocol which has also been reviewed by the EFWAC members.</p> <p>This comment is outside the scope of EA Condition 7 requirements.</p> <p>This comment is outside the scope of EA Condition 7 requirements.</p> <p>School Outreach - Durham's waste education program is based upon a "request" only basis, hence, if a school or Board makes a request they are considered an “Interested Party”. As with our current School Outreach program any presentation or information exchange is tailored to the school board, teacher, instructor or</p>

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		developed to meet EA Condition 7.	professor who makes the request and is subject to their review and approval.
		<p>Bullet 12 – any reference to the DBO and THEIR communications activities is completely outside the CCP. Covanta will develop its own program and whatever incentives are provided to them should be related to properly developed criteria.</p> <p>The only aspect of this that should be reported to the public relates to the costs to taxpayers of any incentives as per Sec. 37(10) of the Project Agreement– as should ALL costs of the incinerator capital costs and operations costs including fines,etc.</p>	<p>As the contractor responsible for the design, construction, and operation of the facility, Covanta is an important stakeholder that should be consulted on all submissions related to the facility.</p> <p>As a contractor to the Regions, clear differences between the Regions’ communication plans and Covanta’s corporate communication plans will be set. The Region included Covanta in the review of this plan to ensure Covanta clearly understands the requirements of the Owner’s communication plans/objectives and those of Covanta’s corporate plan. Covanta’s corporate communication plan will require oversight by the Owner’s to ensure compliance with the Project Agreement and are outside of the scope of the Regions’ EA Condition 7 communications plan requirements.</p>
		<p>Bullet 13 – The Communications Plan of the Owners with their residents/taxpayers and the Communications Plan to be developed by Covanta, are two separate documents, with two separate sets of objectives and requirements. The Regions’ CPP must be carried out in accordance with EA Condition 7 and the DBO communications plan in accordance with the Covanta and Durham/York Project agreement and are by necessity two separate documents.</p>	<p>Financial and budget details, including cost incentives paid to Covanta in accordance with the Project Agreement which are not listed as part of CofA Condition 15 are outside the scope of EA Condition 7 communications plan requirements and will be managed through Regional Committees and Council and posted to the project website under the Council and Committee Tab.</p>
		<p>Information that MUST ALSO be communicated to the public includes all items shown in C of A Condition 15 as a minimum.</p> <p>Furthermore, all information related to project costs ,including but not limited to the list below, should be provided on the project website in addition to regional websites.</p> <p>Amount of Fines and details of any sanctions relating to operations</p> <p>Annual operating fee to DBO as well as amount of any incentives and/or deductions including rationale,</p> <p>ALL pass through costs in addition to annual operating fee incl. costs for natural gas, insurance etc.</p> <p>All costs related to reporting and compliance related to incinerator</p> <p>All planned or past changes to any aspect of project including expansion and related EA or ECA applications, requests/approvals to operating conditions/emissions limits including advising about opportunities to comment in advance of approval by MoE.</p> <p>According to the Project Team response to the latest AEMP comments, from Pg 10, see below:</p> <p><i>The Certificate of Approval requires the Regions to maintain a record of the raw data output</i></p>	<p>The purpose of this Plan as defined by Condition 7.3 is to define how information is disseminated; how the public and aboriginal communities will be notified; and the procedures for keeping interested parties informed (refer to Condition 7.3 a, b c). This Plan identifies the intended audience and what method/media/venues will be utilized to reach the audience. Additionally Condition 7.4 defines what types of information should be made available to the public through a website or other means which the Regions have continually maintained. The details on the specific reports and information to be disseminated are defined separately by the EA and CofA documents or the Project Agreement (PA). It is not the intent of this Plan to provide specific details on what information is reported or how it is expressed, as this will vary according to the audience. As with all the Region’s public facilities, clear, concise, factual and timely information must be provided to satisfy the EA, CofA and any regulatory requirements.</p>

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		<p><i>from the CEMS, which is an important check for audit purposes. The Regions will provide time-averaged data to the MOE and to the public, as specified in Certificate of Approval Condition 16 (Public Access to Documentation).</i></p> <p>Raw data should be retained indefinitely BY THE OWNERS, i.e. from the beginning of planned commissioning in March 2014 to post closure. This data may be required to address current/future public health and environment impacts and must NOT be destroyed OR altered in any manner whatsoever.</p> <p>During the EA there were questions about editing of raw data. Should there be questions around data made available in C of A Condition 15, there should be a mechanism for public/public health authority review of the raw data.</p> <p>As well, the public and stakeholders MUST BE advised of any on-site conditions that are out of the ordinary including but not limited to: emergency including fire, spill, leak, explosion, hauler and/or garbage collection strike, unplanned shut-down/maintenance, malfunction/outage of Air Pollution Control equipment, as well as any event that could result in emissions exceedance/permit excursions that have the potential to impact public health and/or the environment immediately.</p> <p>The public should not have to wait to read about these after the fact in an annual report.</p> <hr/> <p>C of A Condition 16 -public access to incinerator documents.</p> <p>In addition to what set out in Condition 16, there must be a section on the Project Website clearly showing planned changes including expansion, changes to operations etc. clearly identifiable on main page of project website.</p> <p>Hard copies of all documents listed in Condition 15 should also be available at the offices of the two regions.</p> <p><u>Sec. 11 – Triggers for Changes to the CCP</u></p> <p>Bullet one ANY change to incinerator operations – including expansions, changes to operational/emissions limits and monitoring plans and any change in ownership must be advised to the public with same deadlines that apply for advising MoE. i.e. advise public concurrently or immediately after advising MoE.</p> <p>Bullet two Durham Region’s Strategic Plan is mostly window dressing, with lots of big blue sky objectives and buzzwords like sustainability, however, planned initiatives or undertakings like the incinerator are rarely objectively evaluated as to how they actually (not politically) may or may not be consistent with Strategic Plan objectives.</p> <p>If there is any difference in communications objectives in the two plans, the requirements of EA</p>	<p></p> <hr/> <p>Should any of the details related to approvals of the current CofA change, such as facility size and ownership, the Regions will consult with the MOE as to what level of public consultation is required depending on the situation and undertake what is required.</p>

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		<p>Condition 7 and relevant sections of the C of A approval must prevail.</p> <p>Bullet three –any changes in the Co-Owners communications plan cannot result in less, or less frequent, information being provided to the public than is currently the case and must communicate in a manner consistent with EA condition 7 around the incinerator.</p> <p>Bullet four – plans for close incinerator must be advised as soon as this would be reported to MoE as per C of A Condition 18 i.e. at least 9 months prior to closure and the public must also be notified of post closure plan implementation and monitoring of same.</p> <hr/> <p>Sec. 12.0 Appendices</p> <p>Further, the last required meeting was held December 7, 2011 between the hours of 5 – 6:30 pm, which is an exceptionally difficult time for the public to attend. While this may suit the Project Team, every effort must be made to ensure suitable meeting dates and times are selected.</p> <p>2014 is a municipal election year. At no time should communications or meeting schedules be shifted in an attempt to minimize any “political fallout” to incumbents on the two regional councils who may be seeking re-election.</p> <p>A meeting required prior to the receipt of waste, which the Project Team stated will occur in March 2014, yet a meeting date is proposed for the fall of 2013. This meeting should be held as close to the March 2014 start of commissioning as possible so that the most recent and relevant information could be communicated to interested parties. A meeting held too early may not be able to communicate enough detail to the public.</p> <p>Furthermore, this meeting should not be combined with ANY OTHER EVENT or meeting – the sole focus should be on the incinerator project and should include a Project Team Presentation and Question and Answer Session as part of the meeting.</p>	<p>As described in the Draft Communications Plan Section 12: Schedule of Public Meetings, the Regions plan to hold a public meeting prior to receipt of waste in the spring of 2014 revised from Fall of 2013. At this time public will be advised of the status of the facility and commissioning.</p> <p>The meeting will be scheduled as required by EA Condition 7.5 (b) prior to the receipt of waste. Notice will be given a minimum 15 days prior to the meeting as required by EA Condition 7.6.</p>
14	29/03/2013	<p>Section 2.0 Purpose (page 4 or pg 6 of pdf) <i>“In accordance with Condition 7 of the Environmental Assessment Notice of Approval to Proceed with the Undertaking, this Community Communications Plan is submitted to ensure ongoing commitment to public consultation on the energy-from-waste facility which is known officially as the Durham York Energy Centre”</i></p> <ul style="list-style-type: none"> Public consultation means a two way street <p>Section 3.0 Background (page 5, pdf pg 7) <ul style="list-style-type: none"> <i>It is anticipated that facility commissioning will be completed in fall, 2014 - The start or approximate start date for commissioning should be included in this section for the benefit of residents, including those planning on selling their homes before operations, including commissioning, begin at the facility.</i> </p> <p>Section 4.0 Communication Objectives (page 5/6, pdf pg 7/8) <i>The requirements for the Community Communications Plan as outlined in Condition 7 of the EA Approval (see attachment 1)</i></p>	<p>Form letter. Same Responses as those given in Item #6 and #13 and #20.</p> <p>The purpose of this Plan as defined by Condition 7.3 is to define how information is disseminated; how the public and aboriginal communities will be notified; and the procedures for keeping interested parties informed (refer to Condition 7.3 a, b c). This Plan identifies the intended audience and what method/media/venues will be utilized to reach the audience. Additionally Condition 7.4 defines what types of information should be made available to the public through a website or other means which the Regions have continually maintained. The details on the specific reports and information to be disseminated are defined separately by the EA and CofA documents or the Project Agreement (PA). It is not the intent of this Plan to provide specific details on what information is reported or how it is expressed, as this will vary according to the audience. As with all the Region’s public facilities, clear, concise, factual and timely information must be provided to satisfy the EA, CofA and any regulatory requirements.</p>

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		<ul style="list-style-type: none"> • Regions have identified the following objectives: <ul style="list-style-type: none"> o <i>To promote, increase awareness and stress the importance of the 4 Rs, integrated waste management...</i> The objective of Condition 7 is not for promotion or adding a 4th “R”. The objectives are clearly laid out in Condition 7 and should be followed, not expanded upon to promote incineration for Covanta or for political reasons. o <i>To provide a variety of outlets for stakeholders to obtain accurate information and updates during the design, construction and operation phases, including ongoing environmental monitoring of the Durham York Energy Centre.</i> This is more in keeping with the objectives of Condition 7 and could be expanded upon. The Community Communications Plan should be to inform the public about the operations of the facility, including all monitoring activities; provide timely notifications to the public when the facility has exceeded their operational limits and when there have been malfunctions; provide notifications to the public should there be any applications by the Regions or Covanta to amend operating limits, Certificates of Approval or other documents and approvals; provision that all monitoring data and results be made publicly available upon request <i>in addition to</i> the planned display board outside the facility and live website streaming of the monitoring of <i>some</i> pollutants; provide details of what the Annual Reports will include. Section 5.0 Key Messages (page 6, pdf pg 8) <ul style="list-style-type: none"> • This section is far too general in its statements and does not give any information as to HOW these commitments will be achieved. How will they ensure the safety and health of residents? How will they protect the natural environment from excessive emissions or from accidents or any number of problems that might arise? • Statements about enhanced diversion/recycling programs outside of this undertaking don’t belong here. This Community Communications Plan is supposed to be about communicating to the community information about the incinerator/facility, rather than cloud some issues by diverting attention away from the burning of municipal waste and toward what residents may deem more acceptable methods of waste diversion rather than destruction of residual waste. • The statement that Energy from Waste technologies are not competitive with diversion should be removed as this is not a proven fact and many in the environmental waste alternative sector would disagree strongly as evidence has shown. In fact, some studies have been done showing just the opposite. One such report is <i>“Confidential report shows majority of waste to be burnt in Javelin Park incinerator is recyclable, compostable or reusable”</i> - http://goo.gl/QGXzN • We have also seen a delay in implementation of new recycling programs such as clear plastic bags replacing black garbage bags so that recyclables which should not be included and sent to be burned could be rejected or not picked up, and/or fines implemented. So why is all this recyclable material going in the black bags? A “secondary sort” was deemed to be too expensive for this facility., even though Section 21 of the Conditions of Approval state that the proponent shall ensure all incoming waste is inspected prior to being accepted and that recyclable materials are not to be accepted for burning. • <i>“The Regional Municipalities of Durham and York are dedicated to notifying, informing and engaging, as applicable, residents, Aboriginal communities, other interested stakeholders and agencies on the EFW facility throughout the design, construction and operation phases in addition to diversion programs and waste management facilities.”</i> There is no description as to how they propose to do this. To date this has not been the case, except for additions to a website which is not well advertised and not terribly user-friendly. Documents are not always added in a timely manner and without notification, and we are only in the construction phase, not the operational phase. Most recently when members of the public as well as the Municipality of Clarington (host community) Council requested a PIC be held in relation to this Draft Community Communications Plan, Durham Region (Works Committee) gave an emphatic “no”. When 2 advertisements in local newspapers were promised by the proponents at an EFWAC meeting to be placed giving information on, and requesting input from the public, those ads still have not appeared, 	

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		<p>and the deadline for comments is in 2 days. This is an area that needs work and oversight beyond stated commitments.</p> <ul style="list-style-type: none"> At an Energy From Waste Advisory Committee (Section 8, Conditions of Approval) meeting held on October 12, 2012, members from the 3 Community Groups representing the public (Section 8.5, Conditions of Approval) expressed concern with what we viewed as the "inappropriate marketing of incineration and the promotional aspect of the communication plan". From the approved minutes of the October 24, 2012 meeting of the EFWAC: <p>"The Project Team confirmed that this draft Plan follows the methodologies used by the Regions, and that Durham and York communications specialists were involved in the development of this Plan. Further, that the document is intended to appropriately explain waste disposal systems and recovery programs implemented in both Durham and York Regions. The Project Team indicated that school visits would include a discussion of all waste diversion and disposal methods. The Committee member further noted her concern that this is way beyond the scope of Condition 7."</p> <p>Section 6.0 Audiences (page 7 or pdf pg. 9)</p> <ul style="list-style-type: none"> Condition 7 identifies interested members of the public and Aboriginal communities. But the Communications Plan has added school children as a target audience. The waste education program for school children is not part of this undertaking. It appears that schools have been added to this so they can promote incineration, calling it "recovery", which is not part of our Provincial Waste Policy. There is no 4th R (recovery) and for good reason. School programs and attempts to justify or put a good light on incineration, telling children the choices are "burn or bury" (instead of the need for burying that goes along with incineration) are not a part of this undertaking as described by the Minister in conditions of approval. <p>Section 7.0 Stakeholder Consultation and Forums (pgs 7-9 or pdf</p> <ul style="list-style-type: none"> "Over the course of the EA Study, a contact list of those individuals and groups expressing interest was compiled and was continually updated. Consultation will continue for the audiences identified via some or all of the following opportunities:" <ul style="list-style-type: none"> Using "some or all" of the opportunities is too vague. They have listed, for the public: News advertisements/articles; Project website update reports; Press releases may be issued to inform public of key project milestones; Attendance at municipal and regional councils and committees; Attendance at EFWAC and EFW-WMAC committees. <ul style="list-style-type: none"> News advertisements/articles: are not carried in all the local newspapers, and delivery for some is sporadic, as are articles on the subject of the incinerator, since approval was granted by the Province to proceed. At the February 12, 2013 EFWAC meeting, the Project Team committed to place 2 advertisements in local newspapers to advise the affected communities about this draft plan giving information on, and requesting input from the public. One ad was to be placed near the end of February and the other to appear mid-March. Those ads still have not appeared, and the deadline for comments is in 2 days from now. This is an area that needs work and oversight well beyond stated commitments. There was a short article put in local Metroland newspapers due to the initiative of a Durham Environment Watch member who spoke with a reporter in early March regarding the Community Communications Plan to let the public know how to access the plan, that public comments were welcome and how to get more information on the plan including links, since that info did not appear to be forthcoming from Durham Region. See: http://goo.gl/Y8rL9 <p>Many members of the public are not aware of the project website as it has not been well advertised, and no notifications are given to interested parties (the Project Team's "contact list"?).</p>	

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		<p>o Press releases may be issued to inform public of key project milestones – that has not always been done.</p> <p>o Requiring the public to attend <i>municipal and regional councils and committees</i> in order to get their updates, when ALL Durham Region council and committee meetings are held during daytime hours and Clarington (and most other) Council meetings are in the evening but Committee meetings are held during daytime hours – is a prescription for the public not to be informed.</p> <p>o Requiring attendance by the public at EFWAC meetings (held during daytime so it is more convenient for staff, rather than the public) or EFW-WMAC meetings (held in the evening but not well publicized, and the Plans have not as a rule been given to EFW-WMAC members and comments not requested from them) – again, this is making it more difficult for the public to stay up to date and well informed about what is happening.</p> <p>o ALL the ‘opportunities’ mentioned in section 7.0 of the Plan should be utilized, not “some or all”.</p> <p>o When is the “contact list” of those individuals and groups expressing interest used? To date, it does not appear to be one of the methods used to inform and update stakeholders/interested parties.</p> <p>Section 7.2 Advisory Committees (pg 10-13 or pdf pg 12-15)</p> <ul style="list-style-type: none"> • <i>“Two advisory committees have been struck since the EA Approval. These two committees will support the ongoing consultation efforts of the Regions by promoting waste management initiatives, including the EFW facility.”</i> The mandate of EFWAC is NOT to promote Energy From Waste. That is not in our mandate (nor in the mandate of EFW-WMAC). We (EFWAC) are supposed to bring forward concerns to the Project Team and Ministry regarding the project. We were not mandated in the Conditions of Approval to be a promotional or marketing arm for Covanta or for the incinerator. The focus of the plan should be to inform about the operations of the facility, not to promote it. Delete this sentence from the Community Communications Plan • <i>7.2.1 - In accordance with Condition 8 of the EA Approval, the Regions established an Advisory Committee, the Energy-from-Waste Advisory Committee (EFWAC), to address concerns about the design, construction and operation of the EFW facility and to implement mitigation where appropriate.</i> <ul style="list-style-type: none"> o EFWAC has no power to “address concerns”, which implies that EFWAC has some power to actually address concerns, rather than give comments after the Plans have been submitted to the Ministry, and which comments are most often dismissed by the Project Team rather than acted upon, unless specifically ordered by the Ministry. It also implies that EFWAC has some power to implement mitigation where appropriate. Again, EFWAC has no power beyond commenting or making requests, which most often is dismissed by the Project Team with no action taken. This can be seen in the comment tables made up by the Project Team, and also the <p>comment tables provided when we (EFWAC) were allowed to comment on the Terms of Reference which was written by the Project Team with little input allowed from members (I can only speak for the members of the 3 public groups on the Committee). This Terms of Reference has been questioned numerous times by members and changes have been requested but not approved by the Project Team.</p> <ul style="list-style-type: none"> o Meetings are at the discretion of the Project Team, not the members of the committee. <p>Section 8.0 Communication Methods & Tools (page 13 or pdf pg 15)</p> <ul style="list-style-type: none"> • <i>DYE Visitor’s Centre - A real time emission display board will be erected on or near the entrance of the facility once the facility is operational. This data will also be available on the project website and accessible to the public.</i> Regarding the reference to the emissions display board, the Municipality of Clarington has a sign by-law and all signage permits and approvals must be appropriately obtained. That must be done before any display board is promised or erected. • Who will “educate visitors”? Would it be a Covanta or Durham Region employee? Again, will the information be factual or will it be promotional/marketing in nature? Who would oversee content? Will “4 	

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		<p>Rs” be changed back to 3 Rs to remain compliant with present Provincial Waste Policy and requirements of Condition 7.</p> <ul style="list-style-type: none"> • School Programs – delivering waste education messaging regarding the Energy-From-Waste facility to school children should not be part of this Communications Plan. Durham Region has an existing school outreach program. The scope of Condition 7 doesn’t include classroom education and promotional activities. Condition 7 is quite clear and does not include what is being addressed in this section. The undertaking includes communications to the public on site operations, conditions, emissions, monitoring, complaint protocol, how people can provide input re concerns or complaints, how they would receive answers to their questions. This entire section as presently written should be removed from this Plan. • Public Education & Community Outreach (pg 15 or pdf pg 17) <ul style="list-style-type: none"> o The intent of the plan, according to Condition 7, is not promotional but informational regarding operations at the plant itself – monitoring, emissions reporting, etc. Events would fall under programs already entrenched at the Region. This Plan is not for marketing and promotion. o Again, Advertising, Media Relations – these sections all relate to advertising and marketing. “Direct Mail” - it appears there is money and staff for this but not for sending notifications to the interested party (public) contact list they compiled that they talk about in Section 7.0 of this Plan. Priorities should be established and adhered to, rather than straying far afield from the intended content and requirements of this plan (Condition 7). Straying too far afield has the effect of missing the important aspects of Condition 7. o Website – Reports and Plans should be posted in a timely manner. Timely reporting of emissions exceedences to the public, malfunctions and a method of notification to satisfy this should be a part of the Community Communications Plan. That is not addressed. o Live streaming of WHICH emission readings will be available to the public both on the website and display board? All or some? How frequently will emission levels fo substances not continuously monitored be made available and will they be included on the website and display board with clear information on each pollutant, when last numbers received. <p>Section 9.0 DYEC Complaint Protocol (pg 18 or pdf pg 20)</p> <ul style="list-style-type: none"> • <i>The Complaint Protocol is fully implemented with staff (known as First Responders) trained to respond to queries and the prescribed Complaint Protocol process.</i> <ul style="list-style-type: none"> o To date, first responders have not responded to all queries with full/complete information. In Comment/Response Tables it shows that when multiple members of the public requested information to help them with timing for selling of their house, full information was not given. (Example from October, 2012): Question: <i>Resident in Clarington heard news article or radio which stated the EFW facility was going to be built earlier than planned. He wants to ensure he has enough time to sell home and move prior to the facility being operational.</i> Response: <i>The facility is expected to be operational in the fall of 2014.</i> o This response does not inform the resident of when commissioning operations will begin. The resident gave information that he wanted to sell his home and move before operations begin. It would have been more helpful to let the resident know the date when commissioning would begin, not just when regular operations would begin. o Information should be conveyed to the general public who to contact and how to make a complaint or inquiry (media or contact list mailings). <p>Section 10.0: Communication Measurement, Evaluation and Feedback (pg 20 or pdf pg 22)</p> <ul style="list-style-type: none"> • How much and which information from the Durham Call Centre, EFW project team first responders, EFW project email, delegations to Regional Councils and Committees and inquiries, comments, and complaints that are tracked, as per the Complaint Protocol, in addition to all other waste enquiries to 	

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		<p>determine the number of calls related to specific waste questions will be made available to EFWAC and EFW-WMAC and to the public?</p> <ul style="list-style-type: none"> • It is not clear which reports and documents would be provided to EFWAC and EFW-WMAC and which or how much input these committees will have to Regional Council and MOE, or who will review recommendations to ensure safety and efficiency of the DYEC. Only the Project Team? Only Works Committee? Council? MOE? • What are the particulars of the “cost incentive program” service level adjustments and how will that affect costs to the Region and taxpayers? <p>Section 11.0 Triggers for Changes to the Communications Plan (pg 21 or pdf pg 23)</p> <ul style="list-style-type: none"> • <i>All revisions to the Community Communication Plan will be done in consultation with the MOE</i> <ul style="list-style-type: none"> o Any revisions should be done in consultation with EFWAC and EFW-WMAC as well as with MOE. Both committees should also be advised right away if any of the triggers listed in 11.0 give cause for revision to the Plan. <p>Section 12.0 Appendices (pg 22 or pdf pg 24)</p> <p>Schedule of Public Meetings – meetings should be scheduled to be most convenient for the public to attend, including both time and location. Preference should be given for those most affected by this facility – the host community, as far as location.</p> <ul style="list-style-type: none"> • Schedule of EFWAC meetings - <i>To be determined by members</i> <ul style="list-style-type: none"> o Meetings of EFWAC have not been determined by members. Meetings have been scheduled by the Project Team based on being “milestone or event driven”. More consideration should be given to availability to the public. To date, only ONE of the 7 EFWAC meetings since January 20, 2011 has been held in the evening. All 4 meetings scheduled for 2013 are also to be held daytime (noon or 2 pm start times). This appears to be an effort to make it more convenient for all the staff members on the committee or Project Team or who sit as observers, with no consideration given to members of the public who may want to attend. As well, the only people not paid to attend these meetings are the 3 public members who were appointed by the Minister (Condition 8.5) who are there to ensure concerns of the public are heard. Consideration should be given to the public for at least some of these meetings. o Upcoming meeting dates advertised on www.durhamyorkwaste.ca – Upcoming meeting dates should also be advertised/listed on the Durham Region website on the Meetings Calendar page including agendas/minutes: http://www.durham.ca/extcontent.asp?nr=div&axion=newcalendar&setFooter=/includes/councilFooter.inc <p>- EFW-WMAC meetings are now being listed there and EFWAC meetings should be as well, for the convenience and ease of use by the public. They should be listed just as other committee meetings and Council meetings are.</p> <p>Overall, this Community Communications Plan should be to inform the public about the operations of the facility, including all monitoring activities; provide timely notifications to the public when the facility has exceeded their operational limits and when there have been malfunctions; provide notifications to the public should there be any applications by the Regions or Covanta to amend operating limits, Certificates of Approval or other documents and approvals; provision that all monitoring data and results be made publicly available upon request <i>in addition to</i> the planned display board outside the facility and live website streaming of the monitoring of some pollutants; provide details of what the Annual Reports will include.</p> <p>The Community Communications Plan should <i>not</i> be a vehicle for promotion or marketing of incineration as a preferred method of waste management. It is at the bottom of the waste management hierarchy with Landfilling, not as the promotions by Covanta and by the Region(s) seem to indicate.</p>	

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15	03/30/2013	<p>Please find following my comments on the Draft Community Communications Plan as relates to the Durham-York Waste Incinerator:</p> <p>The main concern with the draft document as it stands is that it contains a lot of wording that definitely slants the message towards an advertisement for, and the promotion of, incineration as a safe, viable, and sustainable method of waste disposal when we all know that none of these adjectives are valid. i.e. Section-4 Communication Objectives "to promote..." -- attempting to add incineration (reworded as recovery) to the existing three Rs of environmental responsibility has no place in this type of document. Any such promotion can quite fairly be construed as a free plug for Covanta or a political whitewash for those politicians that voted for incineration - and does nothing to maintain the credibility of the Team. The community would be much better served if this 'Plan' contained concise steps to provide only factual, unbiased and timely information on the operation of the incinerator as it relates to its effect on the health of the environment and residents that now find themselves living under the fallout plume of this process. I do believe that this is the true intent of MOE File: EAAB File EA-08-02, "Condition 7" and that the 'Regions' are legally responsible to, in good faith, abide by that condition.</p>	<p>The term "promotion" as it relates to a 4th R has been removed from the plan.</p> <p>The Regions will continue to communicate the importance of their award winning waste diversion programs, where materials that are recyclable or reusable are removed from the waste stream before reaching the EFW facility. The EFW facility compliments these programs by allowing for recovery of energy and metals from material that is otherwise non-recyclable. In addition, as part of our integrated waste management hierarchy, introducing Recovery as the 4th R will be included as it relates to Energy Recovery and Metal Recovery from the EFW process.</p>
16	03/30/2013	<p>I have reviewed the Draft Community Communications Plan as it relates to Condition 7 of the EA Approval. It is my understanding the CCP is a means by which the Regions communicate with the public, as mandated by the MOE. The document has strayed from its clear mandate, into areas of promotion and public relations for both the Region and Covanta.</p> <hr/> <p>The purpose of the CCP is NOT to discuss "success of diversion programs" by the Region, or how the DYEC Visitor's Centre will be used for committee meetings and displays targeted at local students. Rather, the CCP needs to outline the plans and procedures for communicating factual data, including monitoring statistics, ministry approvals, complaints protocol, and open meetings to the public.</p> <hr/> <p>My main concern relates to the educational programs that will be targeted to local elementary and secondary school students. Extreme care must be taken to separate education from promotion/public relations. Any information given to students must to factual, accurate, and unbiased. I strongly believe that school programs described as "EFW Energy programs" are far outside the scope of the CCP as mandated by the MOE. I request that the section involving school programs be removed entirely from the CCP.</p>	<p>The purpose of this Plan as defined by Condition 7.3 is to define how information is disseminated; how the public and aboriginal communities will be notified; and the procedures for keeping interested parties informed (refer to Condition 7.3 a, b c). This Plan identifies the intended audience and what method/media/venues will be utilized to reach the audience. Additionally Condition 7.4 defines what types of information should be made available to the public through a website or other means which the Regions have continually maintained. The details on the specific reports and information to be disseminated are defined separately by the EA and CofA documents or the Project Agreement (PA). It is not the intent of this Plan to provide specific details on what information is reported or how it is expressed, as this will vary according to the audience. As with all the Region's public facilities, clear, concise, factual and timely information must be provided to satisfy the EA, CofA and any regulatory requirements.</p> <hr/> <p>The Regions commitment to Waste diversion in the EA submission was commended by the Minister of Environment in his letter to the Regions with the EA Approval dated November 19, 2010 and has and will continue to play a role in the undertaking. EA Condition 10 Waste Diversion requires the Regions to ensure waste diversion programs etc are being met.</p> <hr/> <p>School Outreach - Durham's waste education program is based upon a "request" only basis, hence, if a school or Board makes a request they are considered an "Interested Party". As with our current School Outreach program any presentation or information exchange is tailored to the school board, teacher, instructor or professor who makes the request and is subject to their review and approval.</p>

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		<p>I understand that Covanta, but not the public, was consulted in development of the CCP. Covanta's influence in this document is evident throughout, in statements such as "diversion and recovery through EFW technologies are compatible not competitive". This is an opinion, not a fact, and does not belong in the CCP. In summary, the CCP needs to be consistent with the Terms of Reference as outlined in the EA approval. The current document goes outside its scope, and reads more like a promotional plan for Covanta and the Region's Waste Diversion programs. I encourage you to take the public's comments seriously and incorporate these suggestions into future drafts. I look forward to an opportunity to review a more responsible CCP.</p>	<p><i>It is a goal of the Regions to prove that EFW and waste diversion are compatible. If there were not enough studies to confirm this during the Environmental Assessment Study, EFW would not have been considered as a long term waste disposal solution. This point has been deleted.</i></p>
17	03/30/2013	<p>It talks about communicating to "interested" people. It does not provide a platform to propagandize the supposed merits of incineration. The residents of Durham have heard enough of that already.</p> <p>This Draft of the Community Communications Plan fails to deliver. Large parts of it are unnecessary rehashes of other commitments and documents.</p> <p>What the residents of Durham would be 'interested' in knowing is that the facility is operating properly, and that emissions are within the limits set out in the Minister's approvals. If the proponents want to boast, let them exceed those standards by increasing large margins - that's what residents would like to hear.</p> <p>Specific changes to the Plan should include:</p> <ul style="list-style-type: none"> • All references to the 4Rs should be eliminated. This terminology is exclusive to the incineration (and related) industries as an effort to piggy back on the long standing and positively regarded 3Rs. The terminology is not found on the Ministry of the Environment website and we hope it never will. It is a particular travesty because incineration cuts into recycling as it already has in Durham Region even before the incinerator has accepted any waste. • In that context the 4th and 5th bullets under 'Key Messages' should be eliminated. <hr/> <ul style="list-style-type: none"> • All references to school programs should be removed. To the extent that the Regions say they want to promote recycling, an incinerator where mixed waste is being burnt is an inappropriate venue for such a message. Such a message would be better delivered at the Garrard Rd recycling facility or in the school classroom. The existing programs that the Regions deliver in schools with regard to diversion are not related to the EFW facility and that's how it should remain. Those programs should also remove any reference to 4Rs if that terminology is being used. 	<p>The Regions will continue to communicate the importance of their award winning waste diversion programs, where materials that are recyclable or reusable are removed from the waste stream before reaching the EFW facility. The EFW facility compliments these programs by allowing for recovery of energy and metals from material that is otherwise non-recyclable. In addition, as part of our integrated waste management hierarchy, introducing Recovery as the 4th R will be included as it relates to Energy Recovery and Metal Recovery from the EFW process.</p> <p>The Regions commitment to Waste diversion in the EA submission was commended by the Minister of Environment in his letter to the Regions with the EA Approval dated November 19, 2010 and has and will continue to play a role in the undertaking. EA Condition 10 Waste Diversion requires the Regions to ensure waste diversion programs etc are being met.</p> <hr/> <p>School Outreach - Durham's waste education program is based upon a "request" only basis, hence, if a school or Board makes a request they are considered an "Interested Party". As with our current School Outreach program any presentation or information exchange is tailored to the school board, teacher, instructor or professor who makes the request and is subject to their review and approval.</p>

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		<p>Incineration is a controversial subject and if the Regions wish to use the project and taxpayers money to propagandize our youth about incineration, then those opposed to incineration should be given equal time.</p> <p>The proponents were warned back in 2008 about the costly stupidity of the Visitors Centre and the taxpayers should not be subjected to further expenditures in that regard.</p> <p>If Covanta and/or the broader incineration industry want to use the Visitors Centre for their own purposes then they should do so at their own expense (including appropriate rent or facilities' fees paid to the owners - the Regions)</p> <hr/> <p>If the manner in which the proponents failed (on several occasions) to communicate with the public about this communications plan is any indication, then it will be a flipping miracle if they can even live up to the minimal communication that this document commits them to - because to them commitments are just words - unrelated to the deeds that should be expected to follow.</p>	<p>The Visitors Centre is a location where the Regions will hold presentations to the defined audiences in this plan, should they request one, and explain any part of the integrated waste management programs and Waste Diversion initiatives as required by EA Condition 10: Waste Diversion. The Plan has been revised to reflect that the Visitors Centre is a venue where facility documents related to the EA and CofA can be viewed if requested by the public or interested party in accordance with CofA Condition 16(2).</p> <hr/> <p>The draft Community Communications Plan was posted and open for public consultation on the project website in October 2012. Residents who wanted to comment had six months to do so. In total 21 comments were submitted on the Draft Community Communications Plan. A public service announcement (PSA) was issued to all local media on January 16, 2013 reminding the public that the comment period ha been extended to March 30, 2013. York Region communications issued their own PSA to the media on January 17, 2013. The PSA was also posted on both regional municipality's websites and the project website. The PSA was re-issued to local media on February 20 as an additional reminder of the public comment period. The PSA was sent out again as a final reminder on Mar. 13. These PSAs generated the following coverage from various local media outlets:</p> <p>Metroland Media Newspapers - March 18. Durham Radio News - Jan. 16 The Oshawa Express - Jan. 23 and Feb. 20. The Scugog Standard - Mar. 21. The Durham Citizen - Feb. 21.</p> <p>Residents were also advised of the DYEC draft Community Communications Plan through a paid advertisement for the Energy from Waste – Waste Management Advisory Committee placed in all Metroland community newspapers across Durham Region on Jan. 30, 2013. In addition, social media messages were posted on the Region's social media sites (Facebook and Twitter) along with a direct link to the Community Communications Plan from January through March 2013. These advertisements are posted on the project website at the following link: http://durhamyorkwaste.ca/project/media.htm</p>
18	03/30/2013	<p>I would like to suggest an emergency plan be created in the scenario that something goes wrong at the Incinerator such as if something very hazrdous got burned (even though everything burned here is going to be hazardous). The emergency plan should involve actions to be taken such as staying in shelter until further notice, etc. Note: I strongly oppose this Incinerator and I know many others who are.</p>	<p>In accordance with EA Condition 17, A Spill Contingency and Emergency Response Plan for the facility will be prepared and includes emergency response procedures for spills, fire, other operations procedures related to emergency situations, maintenance and training.</p>

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19	03/30/2013	<p>2.0 PURPOSE states that: 'On November 3, 2010, the Regional Municipalities of Durham and York received approval from the Minister of the Environment for the Durham/York Residual Waste Study Environmental Assessment (DYRWS EA). In accordance with Condition 7 of the Environmental Assessment Notice of Approval to Proceed with the Undertaking, this Community Communications Plan is submitted to ensure ongoing commitment to public consultation on the energy-from-waste facility which is known officially as the Durham York Energy Centre. The Durham York Energy Centre Community Communications Plan fits into many of the identified community strategic themes, values and goals identified in both the Strategic Plans of Durham1 and York Regions2 (1 Growing Together Durham Region Strategic Plan 2009-2014, The Regional Municipality of Durham; 2 York Region: Creating Strong, Caring, Safe Communities, Vision 2026, The Regional Municipality of York COMMUNICATION/PARTNERSHIPS: residents, other municipalities and agencies ENVIRONMENT: ECONOMY: Protection of the natural environment ,</p> <p>2 Questions and comments: 1. Question: What Sections of CCP include actual enhancing of partnership and protection of natural environment the way that the general public would be educated on, consulted and outreached by contribution to their activities to ensure that HCA, EA approval commitments and/ or to reflect Durham Region Strategic Plan? Will these points be considered in the final CCP? 2. Question: Local groups, including our environmental organization (FOF) who is enhancing our natural environment for decades, were already discouraged by the rejection of the Region (and or Covanta –operator of EFW who is advertizing themselves as communicator and outreach with local community) to help out financially to mitigate environmental damage of our air, water, soil (by soil monitoring) or by replanting local watersheds or Species at Risk habitat rehabilitation at the EFW or creation of our Waterfront Trail. All these points were to be addressed, according to the EA, HCA commitments. The Regional Argument that the landscaping of the EFW site satisfies these commitments cannot address these issues. Will these specific points of concerns be included in Section 5, as Key Messages of the CCP?</p> <hr/> <p>3. If our health is important to all approval agencies, The order of Key messages 5.0 should be: protection of human health and the natural environment (ADD by mitigating ... as described in details in our point and Question 2 above). enhanced residual waste diversion and recycling programs targeting a 70 per cent waste diversion rate. our residents to the 4Rs. Continued support in our programs by our residents will help us in meeting our waste diversion goals. n (modern- leave out) EFW facility with an inclusive monitoring program that will meet the MOE's (stringent- leave out) new A-7 Guidelines. ersion and recovery through Energy-from-Waste technologies are compatible not competitive.</p>	<p>The purpose of this Plan as defined by Condition 7.3 is to define how information is disseminated; how the public and aboriginal communities will be notified; and the procedures for keeping interested parties informed (refer to Condition 7.3 a, b c). This Plan identifies the intended audience and what method/media/venues will be utilized to reach the audience. Additionally Condition 7.4 defines what types of information should be made available to the public through a website or other means which the Regions have continually maintained. The details on the specific reports and information to be disseminated are defined separately by the EA and CofA documents or the Project Agreement (PA). It is not the intent of this Plan to provide specific details on what information is reported or how it is expressed, as this will vary according to the audience. As with all the Region's public facilities, clear, concise, factual and timely information must be provided to satisfy the EA, CofA and any regulatory requirements.</p> <hr/> <p>This Key message has been revised to the following: "The Regional Municipalities of Durham and York are dedicated to ensuring the safety and protection of human health and the natural environment by strictly monitoring facility compliance with the Ministry of Environment EA and CofA Conditions throughout the life of the facility."</p>

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		<p>ADD - The Region of Durham and York will inform the residents on landfill site situation for the EFW disposal. ADD – The Region of Durham and York will inform the residents on air pollution/reduction (if possible) of the EFW/Regional incoming/outcoming trucks. <i>engaging, as applicable, residents, Aboriginal communities, other interested stakeholders and agencies on the EFW facility throughout the design, construction and operation phases in addition to diversion programs and waste management facilities.</i> 4. Our opinions on Purpose 2.0 and our points 1, 2:</p> <p>Local Community participated at the meetings prior to the EA, but their concerns especially about incineration were not addressed in any way. This process completely discouraged public participation because our local air, water and soil is already polluted (even according to the EA documentation), but no mitigation of these negative effects on the environment (including the precautionary principle) were even considered. This was contrary to the SEV. Even those few public representatives on EFWAC who remain to be committed to our community well being are not being heard now.</p>	
		<p>5. ADD to the Communication Objectives 7.1 members of EFWAC and EFW-MAC as consultants on the Draft CCP.</p> <p>6. ADD words to 7.2 after The proponent shall finalize ‘and include comments from the EFWAC and EFW- MAC’...</p>	<p>Future changes to an approved Communications Plan will be done in consultation with the MOE and presented to the EFWAC.</p> <p>As has been consistent with all draft plans for the EFW facility, the Regions have consulted with the MOE and provided a draft plan to EFWAC for review and comment. This comment response table is prepared in response to the comments received by EFWAC and members of the general public and will be submitted to the MOE explaining the rational for including or not including comments along with the draft plan.</p>
		<p>7. 8.2 School Programs and 8.3 Public Education and Outreach: Specific points of mitigation in our points 1 and 2 involving the schools and public could be outlined in the Events, 8.3.1 in detail.</p> <p>What is the primary goal of this Plan? Is it to influence community belief or to inform the public or school children on waste reduction in general? There should be openness with information to leave it up to the individual perception not enforcing on society promotion of incineration. The main point should be 4 Rs of our waste and rehabilitation of our polluted environment. Otherwise, the public trust in the regional process, in general, will be lost.</p>	<p>School Outreach - Durham's waste education program is based upon a "request" only basis, hence, if a school or Board makes a request they are considered an "Interested Party". As with our current School Outreach program any presentation or information exchange is tailored to the school board, teacher, instructor or professor who makes the request and is subject to their review and approval.</p>
		<p>8. 9.0 DYEC Complaint Protocol: EFWAC and EFW-MAC should be informed of each complaint.</p>	<p>Monthly Complaint Logs are provided electronically to all EFWAC members and the MOE and are also made available on the project website and will continue in accordance with the Complaint Protocol which has also been reviewed by the EFWAC members. The wording of the Community Communications plan has been revised to reflect the fact that this is already standard procedure.</p>
		<p>9. 11.0 TRIGGERS FOR CHANGES TO THE COMMUNITY COMMUNICATIONS PLAN:</p>	<p>Future changes to an approved Communications Plan will be done in consultation</p>

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		<p>Changes to the CCP should include the EFWAC and EFW-MAC Committees input in addition to the MOE. Thank you for the opportunity to comment on the Draft CCP. Hopefully, our comments will be considered this time and implemented in the final CCP. Otherwise, our faith in this process will be lost, again.</p>	<p>with the MOE and presented to the EFWAC.</p>
20	03/30/2013	<p>I am gravely concerned with the Draft Communications Plan. It is supposed to be the Plan to satisfy Condition 7 of the EA Approval, however it fails to sufficiently address the intent of that Condition, and instead includes inaccurate and inappropriate content which is outside of the scope of Condition 7.</p> <p>My concerns include the following.</p> <p>1. Insertion Of Regional Opinion and “Messages” Into Plan Maligns Intent of Minister’s Condition 7 The draft Communications Plan significantly deviates from what is set out in the Minister of Environment’s Condition 7 in the <i>Notice of Approval to Proceed With the Undertaking, EA File No. 04-EA-02-08</i>. Section 7.3 and 7.4 of that Condition are copied below.</p> <p>Sections 7.3 and 7.4 above clearly identify WHAT information is to be communicated in the Plan. Section 7.3 part b) speaks to the Plan informing about “site operations”. Section 7.4 speaks to informing about “activities that are part of the undertaking, including monitoring activities” as well as reports and records “related to the undertaking”. Furthermore, the term “undertaking” is defined on page 3 of the same document, the <i>Notice of Approval to Proceed With the Undertaking, EA File No. 04-EA-02-08</i>, as: “undertaking” means the construction and operation of a thermal treatment waste management facility on the site, as set out in the environmental assessment.</p> <p>The Minister’s Condition speaks to communicating factual information about the undertaking (construction, operations, monitoring), however the Regions’ Project Team has inserted/added their own objectives, messages and beliefs into the Communications Plan, which include promoting incineration and their waste policy. Note that promotion of Regional or industry waste objectives, messages, and beliefs is clearly NOT part of the Minister’s Condition 7.</p> <p>At the end of Section 4.0 of the Draft Communications Plan, the Regions have identified and inserted their own “objectives” into the Plan, including their objective “To promote awareness and stress the importance of the 4 Rs”. This reference and all other references to the 4Rs in the Communications Plan must be removed. While the incineration industry and some Regional staff may have the <i>opinion</i> that incineration can be classed as part of a fourth R, this is <i>opinion</i> and not fact. There are many environmental organizations (including the environmental organizations identified by the Minister as members of the EFWAC Committee), scientists, doctors and members of the public who firmly oppose this belief and studies have been done to show that incinerators are actually a waste (and not recovery) of energy and resources. In Section 5.0, there is another reference to the 4Rs which must be removed.</p> <p>In Section 5.0, the Regions present their “Key Messages” and here the Regions have inserted another opinion as a key message, stating that “Diversion and recovery through Energy-From-</p>	<p>The purpose of this Plan as defined by Condition 7.3 is to define how information is disseminated; how the public and aboriginal communities will be notified; and the procedures for keeping interested parties informed (refer to Condition 7.3 a, b c). This Plan identifies the intended audience and what method/media/venues will be utilized to reach the audience. Additionally Condition 7.4 defines what types of information should be made available to the public through a website or other means which the Regions have continually maintained. The details on the specific reports and information to be disseminated are defined separately by the EA and CofA documents or the Project Agreement (PA). It is not the intent of this Plan to provide specific details on what information is reported or how it is expressed, as this will vary according to the audience. As with all the Region’s public facilities, clear, concise, factual and timely information must be provided to satisfy the EA, CofA and any regulatory requirements.</p> <p>The definition of “undertaking” has been included in the plan.</p> <p>This plan was developed by the Regions in consultation with the MOE. It will include Regional strategies to align with Regional objectives in addition to meeting EA Condition 7.</p> <p>The term “promotion” as it relates to a 4th R has been removed from the plan. The Regions will continue to communicate the importance of their award winning waste diversion programs, where materials that are recyclable or reusable are removed from the waste stream before reaching the EFW facility. The EFW facility compliments these programs by allowing for recovery of energy and metals from material that is otherwise non-recyclable. In addition, as part of our integrated waste management hierarchy, introducing Recovery as the 4th R will be included as it relates to Energy Recovery and Metal Recovery from the EFW process.</p> <p><i>It is a goal of the Regions to prove that EFW and waste diversion are compatible. If there were not enough studies to confirm this during the Environmental</i></p>

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		<p>Waste technologies are compatible and not competitive”. Again, this statement is not factual. It is an industry claim that is highly disputed, not supportable and, furthermore, it is outside of what was mandated in the Communications plan. It would be very wrong to spread this “message” as fact. Again, the Communications Plan should be strictly focused on delivering factual information about the constructions and operations (including monitoring) of the facility as described in Condition 7. The Plan cannot provide for communication of information that is based on opinion or industry claims. In fact, the Plan itself should have a section specifically dedicated to expressing the essential requirement that all communications delivered to the public be factual and accurate. The Regions and the Ministry of the Environment cannot allow this Plan to be hijacked as a vehicle to deliver industry messaging and propaganda.</p> <hr/> <p>2. Draft Plan Audience Differs From that Outlined in Minister’s Condition 7; Includes School Children In his Condition 7, specifically in Sections 7.3 and 7.4, the Minister identified “interested members of the public and any Aboriginal communities” as the target audience for the Communications Plan. The Regions’ Plan, however, also includes elementary and secondary school children as a target audience. As a concerned citizen, parent and educator, I have grave concerns about this vulnerable audience since the content of the draft Plan deviates from the Minister’s condition with the addition of the Regions’ opinion-based “objectives” and “waste education messaging”. While some of the present Durham and York work staff support incineration, there are many environmental organizations, doctors, scientists, citizens and waste experts who are opposed to it, and to promote it as a superior waste alternative would be wrong. Presenting opinion as fact, especially to young school children, is really indoctrination. Furthermore, while the Regions currently have and will continue to have some waste education through school programs, these programs are outside of the scope of the Communications Plan and should not be included in it. Furthermore, school children were not the intended audience the Minister documented in Condition 7 and so Section 8.2 should be removed from the Plan as should any other references to it. School programs should be a separate endeavour of the Regions of Durham and York and how they manage, staff, and pay for those activities is a separate issue from what is outlined in Condition 7.</p> <hr/> <p>3. Draft Plan Contents Have Negative and Unexpected Financial Implications For Public Taxpayers The draft Plan’s deviations from the original mandate set out in Condition 7 have implications for Durham and York residents, not only with respect to what information they will receive, but there are also financial implications for them as taxpayers. Since the Plan is mandated by Condition 7 which is legally binding, commitments in the draft Plan to promote opinion-based “key messages” , industry claims and Regional pro-incineration policy could result in public taxpayers not only facilitating, but also footing the bill to promote incineration industry messaging and marketing . I do not believe nor accept that Durham taxpayers should be financially responsible for promoting waste policy which includes incineration in any form. I firmly assert that I do not want to take on promoting incineration for the industry in any form. I also believe that my community does not want to take on promoting incineration for the industry in any form. It must be noted that many members of the public and numerous councillors have previously made comments, submissions, and delegations voicing their opposition to the inclusion of the \$9 million dollar visitor information centre in the facility plans. Many expressed that they would rather that the</p>	<p><i>Assessment Study, EFW would not have been considered as a long term waste disposal solution. This point has been deleted.</i></p> <p>Wording has been changed:</p> <ul style="list-style-type: none"> • <i>“To educate and increase awareness of the importance of the 3Rs –Reduce, Reuse, Recycle of the waste management hierarchy and the diversion programs offered by Durham and York Regions and to continuously strive to improve resident participation, capture rates and ultimately waste diversion.”</i> • <i>To communicate the 4th R-Recover as a new addition to our integrated waste management system, and the 4th R of our integrated waste management hierarchy, as a means to recover energy from the residential waste which cannot be recycled or composted.”</i> <hr/> <p>School Outreach - Durham's waste education program is based upon a "request" only basis, hence, if a school or Board makes a request they are considered an “Interested Party”. As with our current School Outreach program any presentation or information exchange is tailored to the school board, teacher, instructor or professor who makes the request and is subject to their review and approval.</p> <hr/> <p>The Visitors Centre is a location where the Regions will hold presentations to the defined audiences in this plan, should they request one, and explain any part of the integrated waste management programs and Waste Diversion initiatives as required by EA Condition 10: Waste Diversion. The Plan has been revised to reflect that the Visitors Centre is a venue where facility documents related to the EA and CofA can be viewed if requested by the public or interested party in accordance with CofA Condition 16(2).</p>

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		<p>\$9+ million dollars be spent on better and more frequent monitoring for the facility. The draft Plan makes many references to the DYEC Visitor Centre. The Visitor Centre should be a separate endeavour of the Regions of Durham and York and how they manage, staff, and pay for those activities is a separate issue from what is outlined in Condition 7 and the Visitors Centre should not be included as an essential part of the Plan to meet Condition 7.</p>	
		<p>4. Draft Communication Plan Contains Incorrect Information Regarding Committee Roles In Section 7.2 the Draft Plan misinforms that the two advisory committees “will support the ongoing consultation efforts of the Regions by promoting waste management initiatives, including the EFW facility.” This statement is completely incorrect and inconsistent with the mandate of the EFWAC Committee set out in Condition 8 of the <i>Notice of Approval to Proceed With the Undertaking, EA File No. 04-EA-02-08</i>.</p>	<p>Wording has been changed to the following: “<i>Two advisory committees have been struck since the EA Approval. These two committees will support the ongoing consultation efforts of the Regions in accordance with their individual Terms of Reference</i>”.</p>
		<p>It is extremely concerning how inaccurate the Plan is and how contrary some of its content is to the intent expressed in the Conditions of Approval and it is extremely concerning that no one at the Region or at the Ministry of the Environment caught these discrepancies before the issuance of the Draft Plan. Furthermore, the incorrect information and all <i>opinions</i> on the roles of the Advisory Committees do not belong in the Draft Plan and should be removed from it.</p>	<p>The reason behind providing a “draft” plan is to get useful feedback from stakeholders or interested parties, who can make suggestions for improvement. Constructive feedback is appreciated to ensure a collaborative effort was made in preparing a formal document.</p>
		<p>The Project Team consulted with Covanta prior to developing their draft Plan, but did not consult with the community. This is completely inappropriate.</p>	<p>As the contractor responsible for the design, construction, and operation of the facility, Covanta is an important stakeholder that should be consulted on all submissions related to the facility. As a contractor to the Regions, clear differences between the Regions’ communication plans and Covanta’s corporate communication plans will be set. The Region included Covanta in the review of this plan to ensure Covanta clearly understands the requirements of the Owner’s communication plans/objectives and those of Covanta’s corporate plan. Covanta’s corporate communication plan will require oversight by the Owner’s to ensure compliance with the Project Agreement and are outside of the scope of the Regions’ EA Condition 7 communications plan requirements.</p> <p>The draft Community Communications Plan was posted and open for public consultation on the project website in October 2012. Residents who wanted to comment had six months to do so. In total 21 comments were submitted on the Draft Community Communications Plan. A public service announcement (PSA) was issued to all local media on January 16, 2013 reminding the public that the comment period ha been extended to March 30, 2013. York Region communications issued their own PSA to the media on January 17, 2013. The PSA was also posted on both regional municipality’s websites and the project website. The PSA was re-issued to local media on February 20 as an additional reminder of the public comment period. The PSA was sent out again as a final reminder on Mar. 13. These PSAs generated the following coverage from various local media outlets:</p> <p>Metroland Media Newspapers - March 18.</p>

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			<p>Durham Radio News - Jan. 16 The Oshawa Express - Jan. 23 and Feb. 20. The Scugog Standard - Mar. 21. The Durham Citizen - Feb. 21.</p> <p>Residents were also advised of the DYEC draft Community Communications Plan through a paid advertisement for the Energy from Waste – Waste Management Advisory Committee placed in all Metroland community newspapers across Durham Region on Jan. 30, 2013. In addition, social media messages were posted on the Region's social media sites (Facebook and Twitter) along with a direct link to the Community Communications Plan from January through March 2013. These advertisements are posted on the project website at the following link: http://durhamyorkwaste.ca/project/media.htm</p>
		<p>5. Plan Lacks Provision For Members of Public to Register Interest And To Receive Notifications Clearly the Minister identifies the target audience of the Communications Plan to be “interested members of the public and any Aboriginal communities”. In Section 7.0 of the Draft Plan, the Regions acknowledge that a contact list of individuals and groups expressing interest in the project was compiled and continually updated over the course of the EA, yet they make no commitment to use this list for communication purposes. Conditions 7.3 b) and 7.4 state that the Plan shall include “How interested members of the public and Aboriginal communities will be notified and kept informed about site operations” and that the proponent “shall give notice of and provide information about the undertaking ... through an internet web site and by other means”. I do not believe that simply posting documents on the project website or making press releases in some community papers satisfies the notification obligation spoken to in the Condition. The Plan must be amended so that the Regions maintain a contact list (they could build on the EA list they already have) so that they may identify interested public members and communicate with them by email to keep them informed about site operations and to advise them when reports about the undertaking are posted on the website. In this age of electronic communications, this is a natural expectation of the public and would entail minimal effort and cost for the Regions. If the Regions are sincere about their statement in Section 5.0 of the Draft Plan that they “are dedicated to notifying, informing and engaging, as applicable, residents, Aboriginal communities, other interested stakeholders and agencies on the EFW facility throughout the design, construction and operation phases”, then they should take advantage of this simple and very efficient communication tool and maintain a contact list for emailing interested parties directly when reports are available and posted and when there have been reportable events at the site. The website should also provide opportunity for new members of the public to register as interested public members who wish to receive communications. There should also be some provision to provide some notification by standard mail should there be interested members who do not have email accounts.</p>	<p>The public registry during the EA process concluded with the MOE acceptance of the EA. The Regions are now in the process of establishing a new registry at the commencement of facility operations, where interested parties can subscribe or unsubscribe should they choose, on the project website to receive email notification of new postings to the website. Currently interested parties are directed to particular areas of the project website where they can find what they are looking for and more all in one location. There is an archived section and a What’s New tab, where all the information on plans and reports can be found. There is also a Contact tab where project team can be emailed for assistance or other purposes.</p>
		<p>6. Plan Lack Sufficient Detail Regarding What Information Must and Will be Provided to the Public The focus of the draft Community Communications Plan should be to inform about the operations of the facility, including all monitoring activities. As stated above the Draft Plan has deviated from this focus and other items and objectives outside of the scope of Condition 7 have distracted from</p>	<p>The plan has been revised to remove the report listing under section 8.5 <i>Website</i> and add section 8.6 <i>Facility Reports</i>, to assist those who may not be familiar with the documents required to be prepared and submitted to the MOE by the EA and CofA, as to what documents and information they can expect to have us</p>

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		<p>addressing what should have been the focus on communicating information about the construction, operations and monitoring of the facility.</p> <p>In Section 7.4 b) of Condition 7, the Minister specified that information provided shall include “Reports and records related to the undertaking that are required to be submitted under this Notice of Approval or under any other ministry approvals that apply to the undertaking.” Given this direction from the Minister and since this is the Plan to which public members will refer to to determine exactly what information they are entitled to be informed about, it would be completely in order, and in fact necessary that the Community Communications Plan contain a complete list of the “reports and records related to the undertaking that are required to be submitted” under the Notice of Approval or under any other ministry approvals that apply to the undertaking and that the actual text of the sections of those documents be included as an Appendix so that the public can fully understand what information the Regions are legally obligated to communicate. For instance, it is not sufficient that the Draft Plan simply states that the Annual Report will be made available and provide only partial detail, but rather it should provide the actual text from the Certificate of Approval below which lays out the minimum contents of the Annual Report.</p> <p>In addition, the following items are lacking or are not sufficiently addressed in the draft Plan:</p> <ul style="list-style-type: none"> o how, when and to whom advance notification of commissioning operations will be done; note that this notification needs to be done many months ahead of the initial emissions as there are members of the public who will choose to avoid being in proximity of the site once it is operational o timely notifications to the public when the facility has exceeded their operational limits and when there have been malfunctions; the Plan fails to provide details with regards to emergency procedures and emergency notifications to the public, yet this is an item of great importance to the public; o a commitment to make and details regarding how notifications to the public shall be done should there be any applications by the Regions or Covanta to amend operating limits, facility size, Certificates of Approval, change ownership or alter other documents and approvals; furthermore it fails to address how the public will be <i>consulted</i> should there be any of these amendments; o provision that all monitoring data and results be made publicly available upon request; related to this item is the fact that while the draft Plan acknowledges there will be the planned display board outside the facility and live website streaming of the monitoring of some pollutants, it does not appear that the Plan acknowledges that “continuous records of the same be kept and made available to the public” as stated in Condition 16(2) of the Certificate of Approval below: o while monitoring time-averaged results will be provided to the public, the draft Plan does not appear to include emissions expressed as annual averages or as total annual emissions; it would be informative and useful for the public to receive emissions results in this form with the total annual 	<p>communicate as required by CofA Condition 16.</p> <hr/> <p>Should any of the details related to approvals of the current CofA change, such as facility size and ownership, the Regions will consult with the MOE as to what level of public consultation is required depending on the situation and undertake what is required.</p> <hr/> <p>Emissions reporting is outside of the scope of EA Condition 7, however, all documents required to be submitted to the Ministry of Environment will form part of the public record. The public record file can be accessed by the public through the MOE Regional Director, the MOE District Manager, The Regional Municipal Clerks in Durham and York Regions and the Energy From Waste Advisory Committee in accordance with EA Condition 3. In addition all documents are posted to the project website in accordance with EA Condition 7.4 and will be accessible at the facility Visitors Centre in accordance with Certificate of Approval Condition 16, once construction is complete and the facility opens to the public. A table outlining reporting requirements and where and when these reports will be made available is provided in Section 8.6 and Appendix F of the revised plan.</p> <hr/> <p>Information on the NPRI is public and is available on the Government of Canada website at: http://www.ec.gc.ca/inrp-npri/</p>

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		<p>emissions provided for all continuously monitored pollutants and the projected total annual emissions from the facility for pollutants that are only stack tested (based on their annual stack results) calculated and reported as well; furthermore any emissions submitted to Environment Canada for the National Pollutant Release Inventory (NPRI) should be communicated to the public and Aboriginal communities;</p> <p>o the amount of natural gas consumed as part of the operations of the facility should be included as part of the information about site operations;</p> <p>o the environmental groups also have previously requested and again here I request that the public be provided with a summary of any monitoring data which is invalidated; this summary should include the date , duration, values and amount of data that is invalidated as well as rationale for invalidation of the data.</p>	
21	03/30/2013	<p>Hopefully these comments are not necessary but I will send them just in case. Extensive monitoring in the surrounding areas should be completed and improvements made where necessary. Programs should be put in place to enforce recycling and other waste diversion initiatives to make sure the incinerator is used as little as possible. Obviously most have access to recycling procedures and Durham usually does pretty well for recycling however hopefully plans are already in the works for improvements. Hazardous materials in particular should also be ensured to be removed from the waste stream. The operation of this facility should also be as open as possible to the public. It is your absolute duty to ensure this facility runs as smoothly as possible. The issues I've heard about from some of your other sites are pathetic and are intolerable for this community. While yes it is a good thing it was made obvious to the public that there was an issue it will not be tolerated in this community. No one wants court cases surrounding the incinerator so you must have this facility running in top shape from the start. Under the table, behind the scene schemes are intolerable. Let's hope this facility runs better than the poor persona which the design of this facility portrays. That money would have been much better spent on monitoring programs and operations improvement. Lastly, I do not agree with having an incinerator especially if this will result in community health concerns. I do not know what the health impacts may be but if the risk is any this facility should be shut down. It is unfortunate that we live in a world where there appears to be so much health risk but we need to do our best to ensure all precautions are taken.</p>	This comment is outside the scope of EA Condition 7 requirements.