

Concerned Citizens

concerned.citizens.bda@gmail.com

► **The Hon. Walter Roban JP, MP**
Minister of Home Affairs

30 Parliament St. Hamilton HM12

Dear Minister Roban,

We, the Concerned Citizens (St. David's residents and area stakeholders) are writing to request an urgent stop order per section 13 (d) of the Clean Air Act 1991 to the owners of the MediWaste Incinerator Project located at 10 Waller's Road, St. David's due to the plant being an immediate danger to human life. We are requesting the Minister stop the building of the Medical Waste Facility and the storage of Biohazard Medical Waste at Southside, St. David's as an Environmental Impact Assessment was not conducted by an independent (third party). We understand air dispersion modelling was conducted by Lakes Environmental Ltd, it was not confirmed whether this company was independently sought by government or sought by MediWaste. The Government Department of Planning has approved plans submitted by MediWaste Facility and Pet Crematory- in the height of covid-19 regulations being imposed publically and focus on such. This issue is one of public interest and concern.

We do not have verification this project is safe due to the following:

- a. No Environmental Impact Assessment/Statement conducted
 - b. A combined exposure to airport/airplane pollutants, vehicle pollutants, Amis Crematorium pollutants, newly proposed and approved Pet Crematorium by Amis, Vehicle Emissions Center –No feasibly study conducted
 - c. The location of MediWaste; although in an Industrial Zone is right next door to a Mixed Use Zone
 - d. Insufficient public engagement meetings
 - e. No proper governance of this project
 - f. No proper review of MediWaste business plan
 - g. No guarantees MediWaste will take responsibility of potential effects of air dispersion of chemicals and gases to the neighboring property, businesses and residents
 - h. No guarantees MediWaste is complying with EU/UK safety and industry biohazardous waste and emission standards
 - i. No guarantees of MediWaste being in possession of a waste collection license
 - j. No guarantees MediWaste has a contingency plan in the event of an incinerator systems failure or accidental exposure to toxic waste as a result of a transportation catastrophe or tampering of unsecure, unrefrigerated storage containers
 - k. No guarantees of an emergency disaster plan
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- l. Whether other suitable centrally located industrial zoned sites were identified and explored for MediWaste
- m. There is no full compliance with Bermuda's medical waste policy by MediWaste; as it has not been confirmed that such a policy exists through government officials
- n. There is no safe plan or regulation for safe storage of biohazard waste at the current site Carters Bay Rd. St. David's in which MediWaste has been storing waste in containers there since Feb 2022 (10 months). Currently there 17 containers (4) of which are supposed to be refrigerated and are not, all are unsecured, subject to rodents and have been tampered with (as the owners reported some of locks have been broken off).

When we refer to UK Government Regulations for the storage of medical waste; it is cited:

- Offensive waste types can be stored for up to 7 days if outside or for up to 14 days if stored in a building
- Infectious waste and refrigerated anatomical waste can be stored for up to 14 days
- Unrefrigerated anatomical waste can be stored for up to 24 hours or up to 72 hours if over a weekend
- Cytotoxic and cytostatic drugs other medicines or drugs, dental amalgam, other chemicals or wastes can be stored for up to 6 months

Per MediWaste website www.mediwaste.bm; they share the type of waste collected being:

1. Infectious Waste- Anything that infectious or contaminated
2. Biohazardous Waste & Sharps- PPE, sharps (wastes such as needles, scalpels, broken glass and razors and other forms of waste that have been contaminated with body fluid and microbiological cultures
3. Pathological Waste- Human or animal tissue, body parts, blood and fluids
4. Pharmaceuticals Waste- Unused and expired drug or medicines, like cream, pills, antibiotics- including prescription and over-the- counter medications, veterinary medications and nutritional supplements
5. Genotoxic Waste- Cytotoxic drugs and other hazardous toxic waste, that's carcinogenic, mutagenic or teratogenic
6. Radioactive Waste- Any waste containing potentially radioactive materials

MediWaste mentions they are compliant with Bermuda's medical waste policy; however no government official has been able to share such a policy. We must reiterate MediWaste has been storing waste in containers at Carters Bay Rd. St. David's since Feb 2022 (10 months) unacceptable, we have every right to be concerned proper safety assurances are not being complied with. MediWaste also shares on their website the recommendation of "Don't place medical waste in areas where there is access to the public". In this case MediWaste does not even follow their own recommendation.

The Bermuda Plan of 2018 pg. 51 ENV.3 "states in order to determine the environmental effects of a proposal, the board may require documentation and plans at an appropriate scale and drawn colored and annotated in sufficient detail to accurately explain and show such information as zones, protection areas, boundaries, existing vegetation, location and use of other buildings on adjoining sites."

More over ENV.4 in the Bermuda Plan states "An Environmental Impact Statement **WILL** be required for development projects which because of characteristics of the site or the particulars of the proposal, justify the board carrying out a careful examination of the potential impacts of the development prior to the determination of

the application and may include but are not limited to such developments projects (f) waste disposal systems, major industrial and commercial developments.”

There has been a complete disregard for integral quality and safety checks designed to protect and preserve residents and the environment’s health and well-being such as the requirement for an Environmental Impact Statement.

We are requesting the following:

- A written response to this letter within 7 days
- Serious consideration for an urgent stop order per section 13 (d) of the Clean Air Act 1991 to the owners of the MediWaste Incinerator Project due to the plant being an immediate danger to human life
- Acknowledgement of all of items a-n to be satisfied by verification
- An environment impact statement and feasibility study from an independent- third party to be completed

Sincere Regards,

Concerned Citizens

November 21st 2022

cc. The Hon. David Burt JP, MP Premier of Bermuda
The Hon. David Burch JP, MP – Minister of Public Works
The. Hon. Kim Wilson JP, MP- Minister of Health
Mr. Andrew Dias- CEO BLDC-Bermuda Land Development Corporation
Mr. Geoff Smith- Environmental Engineer- Department of Environment & Natural Resources
Ms. Lovitta Foggo MP- Chair of BLDC & Area MP
Mrs. Tinee Furbert MP- Area MP