

April 9, 2020

Metro Vancouver
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To Whom It May Concern,

Thank you for the opportunity to comment on the Integrated Solid Waste and Resource Management Plan Biennial Report. We are grateful that this report has been produced as it is a useful check on the accomplishments to date. Metro Vancouver is to be congratulated on its success in reduction of tonnes per capita disposed and an increase in the materials recycled per capita however the total amount of waste generated has increased slightly over the ten years (2008-2018). This shows a need to increase the efforts on rethinking, reducing and reusing of products and materials. It is not enough to divert materials, nor to pat ourselves on the back for per capita reductions. To reduce the ecological footprint, there needs to be a reduction in overall use of materials. This will also reduce the GHG impact associated with every product and material consumed, and slow the filling of the landfill.

Since the adoption of the Integrated Solid Waste and Resource Management Plan (ISWRMP), Metro Vancouver has done a good deal of work to drive waste reduction and foster conversations across multiple levels of government and with many stakeholders about zero waste. However, much more action is needed. Please see the comments regarding the specific actions in the report below. We celebrate the positive actions that have been taken and give constructive criticism in the spirit of helping Metro Vancouver to become a leader in Zero Waste.

Goal 1

Strategy 1.1: Advocate that senior governments transfer additional waste management responsibilities to producers and consumers

The creation of the National Zero Waste Council has fostered learning and discussion but it, or Metro Vancouver directly, may be able to more strongly and clearly advocate for the changes needed.

Overall

Many of the actions under this goal are good and work has been started but in many cases, it appears one action was taken but there is no mention of the results nor what next steps are being taken. For example, in 1.3.2, the action is to deliver a community based social marketing plan for businesses. It appears tools were developed but there is no mention of their distribution and how (a key part of any CBSM strategy), nor number of businesses using them, plans for how to reach the other businesses, results for the businesses using them, etc. Actions such as these should be ongoing and evolving based on learnings from the implementation.

It might also be time to consider what other resources are needed. Traditionally waste has been managed through infrastructure projects designed by engineers. As we move towards a focus on rethinking and reduction, other skills will be needed to help with work on behaviour change, policy, communications and bylaws. For this, perhaps new structures, with more clout than REAC, will be needed.

Goal 2

Similar to the comment for Goal 1, there are many actions where one or two steps have been taken but results of that work and next steps are either not noted, or in some cases, the action is deemed complete. Items that fall into this category include: 2.1.3, 2.2.1, 2.2.5, 2.2.7, 2.3.2, 2.4.4, 2.5.1, 2.5.2 and 2.9.1.

For example, further actions Metro Vancouver should be taking include:

- work on reuse at transfer stations and elsewhere beyond individual event days
- ongoing communications and enforcement of bans until results show that it is not needed
- more work on requiring zero waste plans for all events and systems to support that
- development of model purchasing programs to drive recycled content
- working with municipalities to address their barriers to implementing C&D recycling
- development of bylaws or policies to reduce unwanted junk mail and other publications
- development of programs to reduce unnecessary paper use
- creation of an advisory service for recycling programs for multifamily and commercial buildings (perhaps look to San Francisco)

There appears to be a misperception that once a material or product category is regulated under the Recycling Regulation that there are no further actions for the region to take. Regulation of a product category is part of a transition to having producers take responsibility but this transition needs the work of local government to ensure that the programs are delivering on what is intended. Some EPR programs seek to minimize costs by delivering the minimum service required. Regional districts need to play a role in ensuring that all product users have the appropriate service levels and that the programs are putting as much effort into reduction and reuse as recycling (which to date none have even come close). In addition, there is mention that ICI packaging and printed paper will be regulated, however there is no timeline on when this might occur from the Province of BC and so until that time, Metro Vancouver should be working to put systems in place that will support a program once it is regulated. Regional programs that encourage rethinking, reduction and reuse should still be delivered by the region in addition to working with the Province to ensure EPR programs are delivering on this as well. There are still meaningful actions for Metro Vancouver to take in strategies 2.3.2, 2.3.5, 2.5.1 & 2.8.1.

Strategy 2.6 Target organics for recycling and energy recovery

The key aspect is to make sure the priority is to create valuable compost, over the energy component. To achieve this, any energy recovery systems must be set up to ensure there are not incentives to prioritize energy over composting. Metro Vancouver is to be commended for not pursuing mixing of compost with biosolids which is a lower grade of organic material. To ensure the highest and best use of materials, source separation and maintenance of material quality is important. Commendations are also due for pursuing additional organics processing facilities. This kind of infrastructure, scaled appropriately for the amount of organics without unnecessary food waste, is a suitable investment for local government. The *Love Food, Hate Waste* campaign is also a good start on reducing food waste.

Strategy 2.8 Target plastics for increased recycling

An EPR program for residential packaging plastics does not absolve Metro Vancouver from fulfilling these actions. There will be a need for strong advocacy to help reduce the non-recyclable plastics that

are becoming more common in packaging. Single use reduction strategies should be enacted. A review of which multifamily buildings are getting service from Recycle BC and which are not should be done to ensure they are all covered. Preparation should be underway for an ICI packaging program. An analysis should be done of non-packaging plastics and a strategy developed. C&D plastics should also be considered.

Strategy 2.11 Integrated Utility Management Advisory Committee

Metro Vancouver is to be congratulated for keeping its approach to liquid waste and solid waste separate.

Overall

While not noted in the report, an additional component of interest would be the relative budget for each of these goals. In the past, while much was made of efforts on goals 1 and 2, the vast bulk of the spending was on goals 3 and 4. If Zero Waste is to be attained, more actions need to be taken on goals 1 & 2 with suitable funding. This may help to alleviate the impression that work on goals one and two are being deemed complete when in fact, just the first steps have been taken. Much of the work is impressive but considering that ten years have gone by, more should have been done on these goals in that time with proper funding.

Goal 3

Strategy 2.7 Target wood for reuse, recycling and energy recovery

“A feasibility study of expanded C&D processing in the region, and a current study to potentially develop an alternative fuel and recyclables recovery facility which could utilize construction and demolition material along with waste delivered in small vehicles.” Though this action was noted under Strategy 2.4 (page 5, 26 and 27) which is about reuse and recycling, the thrust of it is about burning waste which is neither. From a Zero Waste perspective, the business case should be looking solely at C&D processing for reuse and recycling. Public input on burning of waste was overwhelmingly unpopular when the last waste plan was developed. Instead Metro Vancouver could be developing non-burning strategies for C&D materials as well as asking the Province to fulfill its commitment to include them in an EPR regulation.

Also mistakenly in Goal 2 under 2.7 is a focus on working with a cement plant to burn wood waste. Cement kilns are not designed nor regulated in the same way for this purpose. The use of cement kilns as defacto incinerators is not appropriate and has not been part of a public consultation. The use of these plus the rise of other false solutions using waste as fuel are of concern and contrary to progress towards zero waste. A better course of action is to determine why the wood is hard to reuse or recycle and then look to develop initiatives to address those reasons with a focus on prevention.

Strategy 3.1 Use waste-to-energy to provide electricity and district heating

We have concerns about the action to develop a district heating system based on energy from the Burnaby Waste To Energy Facility (WTEF), also known as the Burnaby Incinerator (3.1.1). Sales of waste

heat from the WTEF depend on having a constant supply of waste, the ongoing use of the WTEF and an ongoing customer. The risks associated with this can be seen in the history of loss of customers (Norampac for steam at WTEF and Catalyst for the Coquitlam landfill gas). Waste incinerators built in this era are being closed across North America. Locking in to the need for ongoing waste and continual, expensive upgrades to the existing incinerator does not seem a suitable direction for a regional district that is aiming for zero waste, trying to address climate change, aiming for good air quality and prides itself on its sustainability agenda. Moreover, this also poses risks for the neighbourhood that is the intended customer for this waste heat in terms of reliability, expense and potential health impacts.

We also have concerns over the “beneficial use of bottom ash” (3.1.5). This should be approached with extreme caution. Each load of waste is different, resulting in different components of each load of bottom ash. Beneficial use is essentially including it some other product, often without the knowledge of the customer. In other jurisdictions this kind of system has been problematic. In general, for potentially hazardous materials, they should be recovered and kept in defined locations with appropriate safeguards rather than distributed in ways that can make it hard to monitor outcomes, or even know of their eventual locations or owners.

Another concern over the Burnaby incinerator is that with the loss of customers for the energy, the net GHG emissions have gone up 79%. Also, the use of natural gas has doubled in 2018 (page 56). This change is worthy of a comment explaining why this was necessary. Both are concerning regarding the climate change impact this has.

Finally and not to be understated, Metro Vancouver is to be congratulated for ceasing to look to build new incineration capacity. This will save money (some of which should be spent on goals 1 and 2), preserve air quality and help Metro Vancouver on its path to Zero Waste.

Strategy 3.2 Recover energy from other solid waste management facilities

Again, Metro Vancouver should take care when setting up these systems to ensure that they are considered a temporary GHG benefit based on past mistakes, rather than a permanent system. Examples in other jurisdictions show policy changes to try to either drive increased gas production (which increases GHG releases as capture systems are at best 85% efficient), rely on the revenue from gas sales or keep putting organics to landfill to provide gas for the systems that were built. The overarching goal must be to keep new organics from going to landfill and avoid new bioreactor landfill systems.

Strategy 3.3: Utilize non-recyclable material as fuel

We continue to disagree that burning mixed waste is a suitable strategy. Aside from other aspects noted above, strategy 3.3.3 is particularly intolerable. EPR programs should not be encouraged to burn “non-recyclables”. A key intention of EPR regulations is to encourage design change. When a product is not recyclable at the end of its useful life, that is exactly when systems should be in place to encourage design change, NOT to provide an option for continuing poor design.



Goal 4

Strategy 4.1: Utilize the Vancouver Landfill as a disposal site

While the change in strategy 4.1.1 is understandable, there does not seem to be enough of a focus on actually reducing total tonnes of material going in. We recommend that funds that would have been spent on new WTE are focused on waste reduction.

Once again thank you for the opportunity to comment and we are supportive of Metro Vancouver's efforts that support Zero Waste.

Sincerely,

Sue Maxwell
Director,
On behalf of Zero Waste BC