July 5, 2021

# A Review of the Regional District of Central Kootenay’s Draft Resource Recovery Plan

Thank you very much for the opportunity to comment on this draft plan. We apologize for the tardiness of this response but hope that our feedback can be included.

We wish to congratulate the Regional District on a fairly good plan that has the clear intent to pursue Zero Waste and a circular economy as the RD changes from a 2010 plan focused on disposal and starting on diversion, to now improving diversion options and starting on reduction and reuse. The strategies are reasonable based on where the Regional District is at this time though the plan could be stronger in some areas, which we will note below in the order they appear in the draft plan:

* Summary of the Draft Plan -A New Resource Recovery Plan -while it becomes apparent in the plan, it would be good to highlight that there will be a focus on waste reduction and reuse (not just awareness of it).
* Introduction -it may be good to point out here that a review is required at five years.
* 1.1 Guiding Principles and Plan Goals -collectively these are sound but it is important to note that Zero Waste is not a goal of 100% diversion but a series of actions based on the [Zero Waste Hierarchy](https://zerowastecanada.ca/zero-waste-hierarchy/) to reduce the impact of consumption through conservation with an end result of less waste and a lower ecological footprint. Likewise, Climate Change is not merely about the emissions associated with waste but also the system emissions that come from every step of the supply chain that become wasted when an item is thrown out. This is acknowledged later in the plan (page 32) but could be highlighted in this section as well.
* 4 In Pursuit of Zero Waste -while this definition of Zero Waste matches the intent of Zero Waste, it should be noted that there is an internationally accepted, peer-reviewed definition which can be seen in the previous link.
* 4.1 Reduction and Reuse -this section has many good actions for reuse but needs more on reduction. This could include single use item bans, a strategy to reduce bottled water use, promotion of refill stores and avoiding packaging as well as highlighting the benefits of thoughtful purchasing (as will be demonstrated for larger entities with the action on sustainable purchasing). There could also be a food waste reduction campaign (many resources exist with the Love Food, Hate Waste one that has already been developed for a BC context). The RD is encouraged to borrow the Metro Vancouver campaigns for waste-less gifts, textiles and super habits.
* 4.2 Organic Waste Diversion -as noted above, a food waste reduction campaign is needed, for all areas, not just those without organics diversion services. The steps for point 6 to ensure ICI participation are sound but should be pursued regardless rather than waiting. The investment in organics processing facilities is a wise investment. Using the food waste [hierarchy](https://ilsr.org/food-waste-hierarchy/) can be helpful to prioritize actions.
* 4.3 Residential Recycling -these are very good strategies. Consider collaborating with other regions, the Ministry and the BC Product Stewardship Council to achieve them. Ask the Ministry to ensure that if a community has curbside service, that recycling through RBC is provided (regardless of how long the community has had the service) so that RBC meets the intent of the Recycling Regulation.
* 4.4 ICI Recycling -consider gathering data from this group on waste types and amounts as well as requiring licenses to haul with reporting being a key part of that (see Regional District of Nanaimo as an example).
* 4.5 CRD Waste Diversion Opportunities -consider working with member municipalities on deconstruction policies and use the examples being set by other communities in BC.
* 4.6 EPR and HHW Management -to demonstrate the needs, in the section 3 on the existing system, it would be good to map out each consumer-facing EPR program and what depots exist to show the Ministry the extent of the gaps.

These are very good actions in this section. Consider also gathering data on the costs that are borne by the RDCK and its member municipalities that are related to the current EPR programs to help build the case to the programs and Ministry that the intent of full producer funding is not being met. Include an action to expand disposal bans to other EPR products once adequate service exists.

As the RDCK is not the only one facing challenges with having adequate EPR programs for all of the products that may be discarded (e.g. mattresses and ICI PPP), its residents and businesses having access to collection points, and the programs paying their costs, we applaud the steps noted to address that and the RDCK’s ongoing work with the BC Product Stewardship Council. Zero Waste BC is willing to collaborate on these issues too.

* 4.7 Circular Economy -this section is good in intent but could be more robust. If the plan is to last ten years, it may be wise to add an action to implement new Zero Waste and Circular Economy policies and programs on an ongoing basis. These actions will create the most potential for waste reduction and as there is a lot of progress and focus on these areas at this time it is likely that new system and ideas will emerge. It behooves the RD to have the flexibility to pursue new items under this umbrella as part of the plan. Another step that could follow from the purchasing policy action is to share it with other purchasers in the region to encourage them to use it as well.
* 4.8 Education and Outreach – the focus on education is good but ideally (with behaviour change) it is a cornerstone of the plan and so needs to be staffed appropriately (not seasonal but all year round) to launch new campaigns around food waste reduction, lower impact shopping, etc. Perhaps this will be addressed when the education/outreach strategy is developed but resourcing this section appropriately should be sorted out now. Also note that it needs to be integrated with policy and other elements. For example, work with Wildsafe can be bolstered by promoting policy and bylaws for communities to keep the waste secured from wildlife. It is important to note that this section is ideally about education, outreach and *behaviour change* (which is broader than education and outreach).
* 5 Residual Waste Processing Technologies - the RDCK is to be commended for not pursuing thermal technologies for waste destruction in this plan however the plan does mention being open to recovery technologies. Waste to energy technologies are extremely problematic as they tend to be very costly in terms of capital costs, operating costs, pollution mitigation upgrades, staff time and especially, opportunity costs. They waste materials and distract from a waste reduction focus. While it is unclear what the scope of these technologies noted may be, it is important to note some examples from other regional districts where they have been clearer in their opposition to waste-to-energy technologies. The Squamish-Lillooet Regional District Solid Waste and Resource Management Plan states that thermal treatment of mixed waste is excluded from consideration for future management of residual waste.[[1]](#footnote-1) The Fraser Valley Regional District notes in its plan that it “does not support the use or inclusion of incineration as a method of “recovery” and goes on to outline that the rationale is because it still requires landfilling, produces toxic residuals and air emissions, produces GHGs, wastes energy and natural resources, creates a demand for waste, imposes long-term financial burdens on local government and there are safer, smarter ways to manage non-recyclable material.[[2]](#footnote-2) The Regional District of Nanaimo notes it will “continue to review and consider alternative technologies that are consistent with the Zero Waste Hierarchy and goal.”[[3]](#footnote-3) The Sunshine Coast Regional District adopted the Zero Waste Definition and a report noted that waste incineration would be contrary to their SWMP.[[4]](#footnote-4) Including some similar language will make the intent clearer to future boards and safeguard the RD from a string of waste to energy sales people.
* 6 Residual Waste Management -similarly the RDCK is to be applauded for the use of existing facilities but it is important that they be run in the most environmentally sound manner possible. We recommend that the environmental requirements (such as a liner and leachate recovery) be implemented if the Creston Landfill is to be expanded, rather than requesting an exemption. Avoidance of costs is not a suitable reason to release pollution into the environment. In fact, prevention of pollution often avoids clean-up and other costs in the future. Tipping feeds that reflect the real costs of the service can help to shift behaviour as well.
* 7 Other -the actions in illegal dumping are well thought out and as noted, bylaws and policy for non-RDCK waste facilities and bins to secure waste are recommended.
* 8 Implementation -this section notes seed fund for local circular economy projects but that is not an action listed in section 4. Some actions look like they continue while others seem to be only a one-off event. For example, there should be a series of CBSM projects that get tailored and adjusted over time based on the results and future needs. The implementation schedule should also allow for the next steps to an action to happen (i.e. continuation of liaison groups or implementing the education/outreach strategy once it is developed).

Note that there will be many EPR programs up for plan renewal in 2023 so it may be wise to ensure there are adequate staff to review the plans and provide feedback (these plans only get renewed every five years so this is a key opportunity to try to drive change in these programs).

* 9 Financing and Administration –staffing -while no region wishes to spend more money than it needs, it is important to look at waste reduction actions and the staff to implement them as the best investment for preventing future waste and thus decreasing all of the costs associated with handling materials.
* 9.4 Cost Recovery and Financial Sustainability - paying more to do things well at all levels of the hierarchy with Pay as You Throw fees, also can drive behaviour change. People should understand that wasting is not free. The plan should provide more staff for what needs to be the main focus -prevention and set the tipping fees accordingly. The move to harmonize to move towards more PAYT is suitable. Additional fees for loads with too much recycling or composting content (once facilities exist) should be pursued (similar to RDKB and many others).
* 9.5 Actions -these are sound but consider regionalizing waste reduction and education initiatives as well if they are not already.
* 10 Impact on Disposal -while we appreciate the enthusiasm for a circular economy, a 5% decrease in waste when the only actions are to lobby other levels of government and to change the purchasing policy is incongruous. It would make sense if additional actions are put in place in sections 4.1 or 4.7 Circular Economy section for reducing waste and if there were staff available to support them, which we have recommended.
* 10.1 Targets -these could even go further given that the provincial target was initially set for 2020 and one could expect that new lower targets would be set over the ten year time frame of this plan. Keep in mind that the less time spent on actual waste prevention and reduction activities results in filling of landfills while time is lost. This is costly on many levels.

This section notes the role of member municipalities which should also include developing their own Zero Waste plans (like Vancouver, Victoria, Whistler, Squamish, Smithers and others), bans on single use items, requiring three stream sorting and requirements to file Zero Waste plans to obtain business licenses and event permits, and requirements for Zero Waste plans and deconstruction for building permits.

* 11 Plan Monitoring - gather data and consider licensing haulers to ensure data is gathered from all sources. This is particularly important to do now as waste import/export noted as a variable and these policies are easier to implement before there are any system disruptions. The waste composition study is a great tool for which the EPR programs should contribute towards the costs.
* 12 Interagency Cooperation -the RDCK may wish to join the Coast Waste Management Association and its working groups as well. Consider also the [Canadian Collaborative for Sustainable Procurement](https://www.reeveconsulting.com/about-ccsp/) for the purchasing policy. Also note that while staff play a role in lobbying for change, elected officials can play a role as well and should be tasked with engaging at UBCM and the Association of Kootenay & Boundary Local Governments to also push for change.

Again, congratulations on getting to this stage and we hope that this feedback will be helpful to your regional district in its journey towards Zero Waste. If we can be of any assistance, please contact us.

Sincerely,

Sue Maxwell

Director,

Zero Waste BC

1. Squamish-Lillooet Regional District (2016). SLRD Solid Waste and Resource Management Plan. Accessed at <https://www.slrd.bc.ca/sites/default/files/pdfs/UES/recycling-composting-solidwaste/SWRMP/SLRD%20SWRMP%202016-03-16.pdf>. [↑](#footnote-ref-1)
2. Fraser Valley Regional District (2015). Solid Waste Management Plan Update 2016-2026. Accessed at <https://www.fvrd.ca/assets/Services/Documents/Garbage/SWMP.pdf>. [↑](#footnote-ref-2)
3. Regional District of Nanaimo (2018). Regional District of Nanaimo: Solid Waste Management Plan -Planning for the Future of Our Waste -Road to 90% Waste Diversion. Accessed at <https://www.rdn.bc.ca/sites/default/files/inline-files/2018%20SWMP%20Amendment_1.pdf>. [↑](#footnote-ref-3)
4. Sunshine Coast Regional District (2019). Special Infrastructure Services Committee agenda. Accessed at <https://www.scrd.ca/files/File/Administration/Agendas/2019/2019-JAN-25%20ISC%20Agenda%20Package%20-%20Special.pdf>. [↑](#footnote-ref-4)