ZERO waste
BRITISH COLUMBIA

Feedback on Proposed Regulatory Framework for landfill methane emissions

11th May, 2023

To: ges-dechets-ghg-waste@ec.gc.ca

Dear Sir or Madam,

Thank you for this work to decrease methane emissions and for the opportunity to provide feedback on this document.

Zero Waste BC is a non-profit association dedicated to driving systemic change towards Zero Waste in BC. Zero Waste is the conservation of all resources by means of responsible production, consumption, reuse, and recovery of products, packaging, and materials without burning and with no discharges to land, water, or air that threaten the environment or human health. Our current resource consumption systems of linear-take-make-waste not only create waste and other forms of pollution, deplete resources, change land uses, and diminish biodiversity, but also generate a huge amount of greenhouse gases which constitute just some of the discharges that threaten the environment and human health. Research for our recent report, A Zero Waste Agenda for BC, showed that from 2010 until 2018, diversion rates increased across BC but the disposal rate remained the same due to increased consumption (up 23% per capita) showing that we need to focus on redesign of systems, reduction and reuse rather than only recycling and composting.

With that in mind, we fully support the general direction but particularly appreciate the option to have an operational plan that includes actions to **reduce** methane emissions rather than merely capture them. This will allow jurisdictions to do a cost benefit analysis of building end-of-pipe landfill infrastructure versus a robust organics disposal prevention system. Offering an option to prove the methane emission levels through assessment and monitoring is a suitable way to ensure actions are having the appropriate effect.

Any methane emission reduction efforts should factor in what the impact will be on organics diversion programs. We suggest further emphasizing the importance of promoting organics diversion as a long term solution. Modeling does not always align with GHG capture in the field given it is an estimate and a fair portion of the gases disperse before a system can be fully established. Capture does not prevent the pollution legacy of landfills from leachate, which continues in perpetuity.

We encourage the system to be the most stringent possible and to consider phasing in smaller landfills over time and lowering methane limits as well to encourage action in

smaller communities as well. These phases should start later but be defined now so it is considered in planning. We are already seeing the current thresholds in BC driving the business case for organics source separation and collection programs and hope that this federal regulation will similarly drive change.

We also feel that the existing offset program should not be used as a reason to delay regulation which should happen as soon as possible. If this will be a challenge for some early adopters that are relying on the offset revenue, individual cases could be evaluated for other forms of support.

We hope that this feedback will assist in developing and strengthening our systems.

Sincerely

Sue Maxwell
Chair, Zero Waste BC

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