February 20, 2025

Re: Consultation – Metro Vancouver Liquid Waste Management Plan

Dear Liquid Waste Management Team,

Thank you for the opportunity to comment on this draft plan.

Zero Waste BC is a non-profit association dedicated to driving systemic change towards Zero Waste in BC. Zero Waste is defined as 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 system is a linear take-make-waste system. Linear resource consumption systems create waste and other forms of pollution, deplete resources, change land uses, and diminish biodiversity by design. They also generate a huge amount of greenhouse gases which constitute just some of the discharges that threaten the economy, human health, and the environment. Here is the link to the Zero Waste Hierarchy which should be followed when developing waste solutions.

While the hierarchy was not designed for liquid waste, there are many areas of overlap where it makes sense to use the same framework including for demand reduction, source control, managing biosolids, minimizing harm to the environment and avoiding burning waste.

Please see our feedback below. Our intention for this feedback is that it will assist in the redesign of our systems for a future where waste (both liquid and solid) does not threaten the economy, human health and the environment.

Sincerely
Sue Maxwell
Chair, Zero Waste BC

Feedback

This feedback is organized along the lines of the hierarchy.

Reduce

- Look at systems to help collect rainwater as heavier rain events and summer droughts become more common such as onsite rain barrels and cisterns. This may also create resilience in case of increased fire risk.
- Work to minimize hard surfaces where not necessary so more rain can be absorbed (for example, like the permeable parking surfaces instead of concrete or asphalt).
- Look to minimize flows into the system -rainwater gardens and bioswales, grey water recycling, composting toilets, water metering, etc.
- Step up the pace of water metering and use these funds to help support the liquid waste system costs (more of a user pay system) but include steps like BC Hydro where the first necessary volume is affordable but increased use over that escalates the costs.
- Strengthen water conservation measures. Ensure no flow through cooling systems exist in Metro Vancouver.
- Set ambitious targets for per capita consumption.

Minimize toxicity and contamination

- We fully support the action to decrease food waste.
- Recommend that backyard composting is encouraged (recommend resurrecting the North Shore Recycling Program's outreach and education systems).
- Ban garburators/in-sink disposal throughout the region -ban them for new builds and phase out existing ones over time.
- Work with EPR programs for pharmaceuticals and HHW to reduce disposal through the liquid waste system.
- Suggest that all commercial businesses are encouraged to develop zero waste plans that also factor in impact on liquid waste (i.e. including food waste, grease traps, management of hazardous waste, etc.). Businesses should provide receipts indicating if they have grease traps and servicing based on their potential for grease loading.
- Look to specific industries to see what further work is needed (for example, Victoria mandated mercury amalgam separators for dental offices -what does current testing show is needed by industry?).
- Develop systems to capture microplastics (at the sewage treatment locations but also at the disposer end).
- Advocate to the province to regulate additional contaminating products (or packaging) through the Recycling Regulation.
- Advocate to the province and federal government to regulate contaminants such as pesticides, PFAS, microplastics, etc.

- Advocate for systems to minimize microplastics (such as capture systems for washing machines, dishwashers).
- Continue to encourage smarter behaviour around fabric choice, washing frequency and washing temperature with the Our Ocean Thanks You campaign.
- Encourage better choices of products to avoid PFAS.
- Look ahead to what other possible sources of contamination exist and work with higher levels of government to address this, ideally in a proactive rather than reactive manner. Perhaps all chemicals released need to be proven safe rather than experiencing decades of impacts (some irreversible) before banning them.
- Work with the province to support a preferred pharmaceutical prescription compendium for pharmaceuticals that are more likely to break down and to break down into less harmful components (as was done in Sweden).
- Continue the Unflushables campaign and advocate to ban incorrect labelling of wipes as flushable. Discourage the use of wipes in favour of reusable cloths.
- Support the switch to reusable menstrual supplies rather than single use.

Work to ensure the system captures all the liquid waste

- Develop systems to prevent sewage escape from other sources such as boats, portapotties and RVs. This may require working with the federal government or other jurisdictions.

Metrics

- Work to make the system as clean as possible, including tertiary treatment for all plants to a level that the Board would feel comfortable eating a dinner each year of shellfish harvested from near or downstream of the treatment plants.

- All GHG calculations should include both biogenic and non-biogenic emissions but show each individually.

- Have neutral or community-interested third parties conduct tests of effluent water quality, biosolids etc.

Biosolids

- Recommend the best possible systems to minimize contamination of the biosolids with harmful chemicals and contaminants.
- **Do not burn** the biosolids nor develop it as a fuel pellet as this will be harmful in terms of air pollution, releasing contaminants and increasing GHG emissions. For more information on why this should not be pursued, refer to our submission on the Metro Vancouver Waste to Energy Facility Operating Certificate Amendment December 2024).
- If any fertilize pellets are to be made, each batch should be tested for and labelled with info on heavy metals, pharmaceuticals, PFAS, microplastics and other possible contaminants.
- Aim for the highest quality of biosolids as possible so that they eventually could be used to replace soil nutrients.

- Ban biosolids from going to the incinerator, cement kilns or other burning devices.
- Do not pursue business cases that involve thermal destruction of the nutrients.

Renewable energy

- As sewage flows will continue and should eventually be 100% organic material, consider building a system to use energy from the liquid waste system (gas or thermal) and connecting this to the district energy system instead of the incinerator.