

July 6th, 2026

To the Metro Vancouver Board, zerowaste@metrovancouver.org + Minister Davidson

Feedback on the 2026 Metro Vancouver Solid Waste Management Plan

Zero Waste BC has been following the progress of the development of the updated solid waste management plan closely, with multiple members sitting on the Public Technical Advisory Committee (PTAC) (and its three working groups), two presentations to the Metro Vancouver Zero Waste Committee and working on two of the public engagement opportunities as partners. Our mission is to advance Zero Waste in British Columbia and so it is important to have a strong plan for the largest regional district in BC.

While we appreciate the enhanced effort that has gone into more robust engagement, we have serious concerns with this plan and the planning process. These issues include concerns around the process:

- The plan has taken far too long to develop (7 years for a ten year plan that was due in 2021).
- The planning process did not meet the Ministry guidelines. Additional review of how the plan compares to Ministry guidelines for waste planning and inclusion of waste to energy in a plan are in Appendix A.
- Input and feedback from the PTAC, the Industry Advisory Committee and the public was routinely ignored and very few changes were made as a result of the robust engagement process. This started with ongoing discussions about an appropriate hierarchy, definitions for recycling and diversion, lack of ambition in using the suggestions from the three working groups and concluded in ignoring the 98% of written submissions on the first draft of the plan which called for closing the incinerator (which included [a petition of 375 individuals and 10 organizations](#)). Written submissions also showed clear support for stronger targets, use of the Zero Waste hierarchy and investment in zero waste solutions rather than disposal.
- Notes from the Public Technical and Industry Advisory Committees routinely minimized advice on adopting the zero waste hierarchy and stopping incineration until the Independent Engagement Panel members started attending the meetings following complaints (see ZWBC's letter [here](#)).
- There was a lack of transparency on meetings with the Regional Engineers Advisory Committee, Regional Administrators Advisory Committee, Regional Waste Reduction Coordinators, and First Nations.
- Expert consultants were hired but they were not visible after the start of the process and their involvement was very limited.
- While there was the positive aspect of more focus on engaging people who may not have participated in the past, no engagement occurred on key regulatory measures that

would be needed for a successful plan, which was a missed opportunity and will cause more time delays before implementation.

- There was no analysis for local residual waste disposal options and no analysis of what continued use of the incinerator would cost (despite the fact that a condition assessment report was commissioned in 2023 - redacted version available [here](#), obtained through a FOIPPA request only provided after the Board approved the plan despite a request starting in 2025). There was no analysis of costs, alignment with goals nor GHG or other impacts. When ZWBC provided [an analysis](#) using publicly available information, these were ignored or refuted with no supporting evidence.
- Metro Vancouver obfuscated on actual comparable costs of the four options (Zero Waste, Vancouver Landfill, Incinerator, external landfills). Additional [information](#) was provided to ZWBC under an FOIPPA request. (See our [letter](#) to the Metro Vancouver Board March 24, 2026 and [spreadsheet](#) used for calculations)
- While time was passing, contracts for the incinerator were getting locked in under the outdated old plan while Metro Vancouver continued to resist implementing pollution mitigation requirements that had been clear since 2011.

There are also fundamental problems with the plan:

- The targets are weak with most missing five year targets and using rolling averages so accountability will be poor.
- There are no firm commitments to deliver on the plan (senior staff continue to state to local elected officials that actions will be decided year by year by future boards). This “business casing” approach means that there is no point in having a plan, instead it is a list of unfunded options.
- The action timetables and budgets lack commitment and detail.
- The capital budget beyond the existing approved Metro Vancouver five year budget (which was developed and approved without input from the planning process) has no detail at all (\$510 million capital costs added from draft 1 to draft 2 but does not state what this is for).
- See [here](#) for additional elements covered in the feedback provided to the PTAC.

To correct this, the plan should be amended to have:

1. Use the Zero Waste Hierarchy and definition. Have this centred in the plan.
2. Set ambitious targets in the time frame of the plan with clear interim targets.
3. A phase out plan for the incinerator (or failing that a clean detailed analysis for residual disposal with social, environmental and financial impacts for all options).
4. A clear plan for timing, staffing and funding of zero waste solutions including:
 - a. Waste prevention
 - b. Reuse and Repair
 - c. Recycling and Composting -enhancing programs to be simple and consistent to ensure clean materials are captured properly. Multifamily, business, institutions, industry and construction locations need to have better programs and services.

- d. Reducing toxicity - actions to decrease the use of toxic materials as well as the emissions of toxic pollution
 - e. Enforcing and enhancing existing bans with more inspections, a requirement for clear bags and mandatory source separation.
- 5. Inclusion of consumption-based emissions metrics associated with actions.
- 6. A commitment to transparency with clear, regular reporting and using the zero waste definitions for recycling. Diversion should not include any items sold as or burned for fuel.

Overall the process has felt like a way to maintain the status quo with the outcomes predetermined. We recommend that neither the Metro Vancouver Board nor the Ministry approve this plan until the deficiencies are rectified. If the Ministry were to approve such a poor plan, it would only weaken all future plans across the province. It is also important to ensure that any changes to the existing incinerator or new disposal capacity be required to go through the amendment process before any work is started.

Sincerely,
Sue Maxwell
Board Chair
Zero Waste BC

Appendix A- Comparing Metro Vancouver’s draft SWMP to Provincial guidelines

The Metro Vancouver draft Solid Waste Management Plan and process have been compared to two sets of provincial guidelines: the first is for solid waste management planning and the second is for inclusion of waste to energy in a plan.

1. Comparison to the Provincial solid waste planning guidelines

<https://www2.gov.bc.ca/assets/gov/environment/waste-management/garbage/swmp.pdf>

Guidance	Adherence
A.2.3. Targets	Only one 5 year target and original draft had most targets over 10 years out.
B1.1. Initiate plan update	resolution in 2019
B1.2 Set up teams and committees, plan to engage with First Nations	Yes
B1.3 Design the consultation process	Yes, unclear on engagement with community interests (Community associations and ratepayers’ groups: Chambers of commerce, local businesses and business associations, Consumer groups, Educational institutions, school districts); ICI interests, Out of region interests but other categories are represented. While the process meets the “adequate” consultation steps, it has failed to incorporate the feedback from the process into the plan
B.1.4. Develop the budget	Not public
B.2.1. Identify principles, goals and targets	Note that despite numerous suggestions to do otherwise, zero waste and circular economy are not in the guiding principles; it does not promote the first 3Rs; it does not mention preventing organics and recyclables from going to disposal; collaboration with other RDs, nor partnerships. Rationale for difference from provincial guidelines unclear (checklist point 9).
B.2.2 Prepare background information	Missing population forecast and waste forecast, economic base information, topography, section on climate

B.2.3. Assess the current solid waste management system	Fails to note the “international” and “special handle” waste and if it is approved for management at the incinerator; overview of Metro Vancouver’s own system but almost nothing about the overall system (such as drive times and inclusion of municipal-run depots, existing reuse and reduction aspects, existing municipal policies, existing product stewardship programs and EPR collection locations, collection pathways by area and material, existing and planned solid waste management capacity including remaining capacity and critically: projected needs, and education programs -regional and municipal). The plan does not include a review of what is working well or not (strengths, areas for improvement, implementation of existing plan, meeting targets and information gaps). The plan does not identify drivers for its development (i.e., current challenges and opportunities for regional MSW management) (checklist point 10). The plan does not include an analysis of efficiency / consistency opportunities with other regional districts and any options that have been pursued. (checklist point 11). The plan has a map of Metro Van disposal facilities but is missing the location of non-disposal facilities, non-Metro Vancouver facilities and external facilities as well as closed landfills. (checklist point 12)
B.2.4. Consider trends affecting solid waste management	There is no section on the plan for this but should include: closure of facilities burning wood waste, stricter standards for emissions, increase in plastic packaging, expansion of EPR programs, impacts of federal and provincial plastic actions, increase in interest for refill and deconstruction and closure of incinerators in Oregon and California.(checklist point 14)
B.2.5. Consult the public	Consultations were held but feedback was routinely ignored. The version of the vision, principles and hierarchy approved had not been discussed by the Industry nor Public-Technical Advisory Committees.
B.3.1. Develop potential strategies	Strategies were suggested and some were evaluated. The evaluation process was obscure in terms of how the principles were defined and applied (for example, affordability was assumed to just refer to amount of tipping fees rather than the full costs that may be incurred or avoided such as through systems to minimize waste).

B.3.2. Assess the financial and administrative implications	There has been no financial analysis nor assessment of the administrative implications. The plan leaves it up to future Boards and their budgets to determine if any actions will take place. There is also the mention of the need for business cases for future actions meaning that most actions will take far longer and this plan does not commit the region to any actions. It also means that there has been no strategic look at what is the most cost effective way to manage waste with no information provided to decision makers except for an oddly contorted calculation for disposal costs for one anomalous year with no look to the future and not including the results of a maintenance assessment for the incinerator commissioned in 2023. Triple bottom line estimates have not been conducted. Note for borrowing, Metro Vancouver will need an approved plan that includes capital costs related to projects identified in plan. The first draft plan had the existing five year budget (with no provisions for any additional funds to enact actions) included but there were no details on capital costs and the second draft noted \$900 million in capital costs but this was not substantiated with any details. These details need to be provided and consulted on before plan approval, and certainly before any borrowing occurs. None of the checklist point 17 criteria are met.
B.3.3. Consult the public and interested parties on the options	Consultations were held but feedback was routinely ignored.
B.4.1. Prepare draft plan	Despite intentions for additional transfer stations, the use of schedules has not been implemented meaning plan amendments will be more complex. Missing: An inventory of closed facilities, terms of reference for committees, product stewardship programs and collection facilities in the plan area, links to municipal and regional district bylaws respecting waste management, a listing of current tipping fee information. The plan does contemplate new facilities for management of MSW but does not describe a process for the development of the new recycling and waste centres. (checklist point 13)

	The plan has clearly defined roles for municipalities but less so for other actors. It is unclear if it has secured support for these from the member municipalities. It is also less clear on how the plan may support them. The risk analysis is weak. (checklist points 15 & 16) The plan does not lay out the environmental, social and economic impacts. (checklist point 18). The implementation schedule added for the second draft does not show when plan targets will be met (checklist point 21 and are being presented to the Board as possible time frame with the Board to decide if any of the actions will actually happen on a case by case basis in the future. There are no firm schedules nor plans to update schedules
B.4.2. Consult the public on the draft plan –“there should be a demonstration that interested parties were consulted during the development of the plan and that the outcome of consultation was considered in the finalization of the plan.”	Consultations were held but feedback was routinely ignored. For example, 420 of 430 public comments =98% (including a petition and framework) called for the closure of the incinerator yet the response was to point to a flawed disposal cost calculation rather than a comprehensive, forward-looking residuals disposal option analysis. Note the consultation summary has not shown how the public consultation was used to influence the plan, the rationale for why each option was not being pursued, the impact on the neighbouring regional districts, nor the level of public support for each option. No consultation were held regarding any new bylaws (a missed opportunity especially given the length of the planning process).(checklist point 22)
B.4.3. Prepare final draft for submission	Note the second draft did not incorporate the intention or changes suggested in much of the feedback, in fact sometimes the changes were made in the opposite direction (for example, a call to remove energy recovery from the recovery section and ensure it focused on material recovery led to the material recovery aspect being deleted). In addition, a request for a comprehensive analysis and look at the risks of the incinerator led to a new strategic principle being added supporting “local waste management” without showing

broad support for this in the feedback nor reflecting a triple bottom line analysis that would support it.

This was the most recent stage reached as of March 31, 2026.

2. Comparing the plan to the Provincial guidelines for waste to energy

<https://www2.gov.bc.ca/assets/gov/environment/waste-management/garbage/wtefactsheet.pdf>

Criteria

Guidance	Adherence
All Regional Districts that plan to direct a portion of their MSW to a WTE facility must seek an amendment to their SWMP, prior to considering WTE as a waste management option, that adds sufficient detail which:	
a) Identifies a municipal solid waste disposal rate target of 350 kg/capita/year with measurable interim targets set and met throughout the planning and implementation process;	The plan mentions a target of 350 k/person by 2031 but no measurable interim targets are set nor a concrete plan for how to meet this target (no schedule outlining financial, staff and other resources to be used to implement the plan. In fact, the budget requirements are being left to future business cases and future board approvals. Also, the plan notes it will use rolling five year averages making it harder to see effective changes. The muddying of the water by including some forms of recovery as not being included in “disposal” means that clarity on what is included or not in the calculations will be important.
b) Highlights that WTE planning and capacity is conducted only after considering the higher levels of the hierarchy and does not impede efforts to achieve higher levels of reduction, re-use and/or recycling initiatives; and	Despite strong support for actions at the higher levels of the hierarchy at the Public Technical Advisory Committee and in public feedback, this plan remains committed to high levels of spending and resource dedication to burning waste rather than preventing it. The financial resources required to maintain the incinerator are at the expense of meaningful actions on reduction, reuse and recycling.

c) Authorizes the WTE facility to accept MSW for treatment and/or disposal.	While the plant is authorized to accept MSW, there remains the outstanding requirement for research and engagement to update the Operational Certificate.
The guide further notes:	
In order to be considered under the 4th R of the hierarchy, the Ministry expects that the facility has an energy efficiency of at least 60% as measured over a 12-month period. When a WTE facility does not achieve 60% energy efficiency over a period of 12 months, the Ministry will consider that WTE facility as a Residual Management facility (5th R)	The facility has never met this criteria and the plan acknowledges that the incinerator is a form of disposal. However the plan includes a goal to focus on recovery using other waste to energy that it will claim to be a form of recovery without proving that it would meet this consideration.
The Ministry expects that the criteria in Table 1 be met for all WTE facilities*:	
Local governments contributing MSW to a facility must have an approved SWMP that authorizes and/or recognizes the WTE facility to accept and dispose of MSW. The SWMP is expected to include a municipal solid waste disposal rate target of 350 kg/capita/year before considering the use of WTE technologies for managing MSW. In addition, the SWMP should prioritize strategies that would help reduce, reuse and recycle waste, and ensure that WTE is not impeding these efforts.	Key aspects are noted above . In addition, the plan is not as clear as it should be on where materials will flow for disposal, including to cement kilns and pulp and paper mills.
Assessment and comparison of waste management treatment and disposal options should be completed.	This has not been done. The Residual Disposal Options Analysis was vague, not locally specific, not looking at best practices, and did not look at effectiveness, costs nor options higher on the hierarchy.
Adopt the best achievable technology. This should be determined by assessing feasible options based on reliability, cost effectiveness and discharge intensity.	This was not done. In addition, a report commissioned in 2023 to look at the maintenance and capital requirements for the incinerator has yet to be completed and thus did not

	inform the plan. Recent reliability issues were also not noted in the plan.
Clearly identify viable solutions for disposal or beneficial use of bottom ash, fly ash and/or liquid by-products.	The proposed use of bottom ash does not adhere to the precautionary principle and the destination for fly ash is not clear on if the material is going to a landfill designed to handle hazardous waste.
The emissions from a facility must meet the Ministry's Factsheet Air Emissions Combustion of Municipal Solid Waste and emission requirements set out in the site specific authorization for the facility.	The facility does not meet the Ministry's Factsheet Air Emissions Combustion of Municipal Solid Waste despite this factsheet being released in 2011 and giving clear warning that existing facilities should comply by 2013. The emission requirements for the Operational Certificate may be met however Metro Vancouver has long been resisting adoption of the 2011 requirements, with subsequent deadlines set for 2025 (unmet) and 2028 (appealed). The result is that now Metro Vancouver must conduct research and engagement to establish new parameters. It should be noted that other jurisdictions have stronger requirements and the factsheet notes "As other jurisdictions update emission limits for MSW combustion facilities and technologies and techniques improve, the Ministry will update the guideline as appropriate".

* The guide states "This information applies to thermal treatment technologies such as mass-burn incineration (including **cement kilns and pulp and paper mills**), gasification and pyrolysis that recover energy from MSW, but does not apply to anaerobic digestion and agricultural greenhouses and does not describe site specific requirements of proposed facilities" (emphasis ours).

Conclusion

The Ministry should not approve the plan as is as several key steps have been missed and requirements remain unmet.