



## REGIONAL DISTRICT OF BULKLEY-NECHAKO

### WASTE MANAGEMENT COMMITTEE (Committee of the Whole)

#### AGENDA

Thursday, May 1, 2014

Page		Action
	1) Accept Supplementary Agenda	
	2) Minutes	
2-4	Waste Management Committee Meeting Minutes March 6, 2014	Receive
	3) Business Arising Out of the Minutes	
	4) Items for Discussion	
	5) Reports	
5-27	Janine Dougall, Director of Environmental Services – Impacts of Proposed Draft Interim Second Edition Landfill Criteria for Municipal Solid Waste on RDBN Landfill Facilities	Recommendation
	6) Correspondence	
28-30	Article from The Prince George Citizen, April 18, 2014, Titled: Expanded Service Unaffordable for Now: MMBC	Receive
31-33	Letter from: Craig Wisehart, Chair, Stewardship Agencies of British Columbia, Re: SABC 2013 Action Plan Comments	Receive
34-38	Letter to: Stewardship Agencies of British Columbia, Re: Receive Comments Regarding Stewardship Agencies of BC – Action Plan to Enhance Extended Producer Responsibility in BC (2013 Action Plan)	Receive
39	Letter from: Julia Kokelj, Environmental Protection Technician, MoE Northern Region, Re: Electric Fence Operation and Landfill Maintenance - 2014	Receive
	7) New Business	
	8) Adjournment	

**REGIONAL DISTRICT OF BULKLEY-NECHAKO**  
**WASTE MANAGEMENT COMMITTEE MEETING**  
**(Committee Of The Whole)**

**Thursday, March 6, 2014**

<b>PRESENT:</b>	Chair	Taylor Bachrach
Directors		Carman Graf Tom Greenaway Bill Holmberg Dwayne Lindstrom Bill Miller Rob Newell Jerry Petersen Ralph Roy Stoney Stoltenberg
Directors Absent		Steve Freeman, Electoral Area "E" (Francois/Ootsa Lake Rural) Thomas Liversidge, Village of Granisle Rob MacDougall, District of Fort St. James Gerry Thiessen, District of Vanderhoof
Alternate Director		Linda McGuire, Village of Granisle
Staff		Gail Chapman, Chief Administrative Officer Cheryl Anderson, Manager of Administrative Services Hans Berndorff, Financial Administrator Janine Dougall, Director of Environmental Services Wendy Wainwright, Executive Assistant
Others		Joan Graf, Telkwa

**CALL TO ORDER** Chair Bachrach called the meeting to order at 12:34 p.m.

**AGENDA** Moved by Director Stoltenberg  
Seconded by Director Greenaway

**WMC.2014-2-1** "That the Waste Management Committee receive the March 6, 2014 Waste Management Committee Agenda."

(All/Directors/Majority)      **CARRIED UNANIMOUSLY**

**MINUTES**

**Waste Management Committee Meeting Minutes -February 6, 2014** Moved by Director Graf  
Seconded by Director Stoltenberg

**WMC.2014-2-2** "That the Minutes of the Waste Management Committee for February 6, 2014 be received."

(All/Directors/Majority)      **CARRIED UNANIMOUSLY**

## **ITEMS FOR DISCUSSION**

### **Manson Creek Landfill**

Discussion took place regarding the issues identified by the Ministry of Environment at the Manson Creek Land fill, the self-reliant nature of the approximate 50 residents at Manson Creek in regard to the area bear population and the implications of closing the facility. Due to the isolated nature of the facility and small seasonal community a contractor attends the site five times a year between the months of May to September and during the winter months snow removal is preformed when necessary.

Solutions to address the Ministry of Environment's (MoE) concerns regarding garbage conditioned, human habituated bears was discussed. The use of a trailer system and a bin system were discussed to aid in keeping the bears from the garbage. The potential ineffectiveness of an electric fence in regard to grizzly bears and the lack of power for an electric fence at the site were brought forward for discussion.

The RDBN Solid Waste Management Plan states that the site was slated to be operated as a long term landfill, with the RDBN requesting exemptions to the landfill criteria. If changes are determined to be needed the RDBN Solid Waste Management plan may need to be amended and public consultation completed.

In the spring of 2014, once all the snow has melted, the RDBN Environmental Services Staff will perform a site visit of the Manson Creek Landfill site to assess the site and determine the appropriate plan to address MoE concerns as noted in the September 6, 2013 Inspection report. Staff will provide a report to the RDBN Waste Management Committee after the site visit has been completed.

## **CORRESPONDENCE**

### **Correspondence**

Moved by Director Holmberg  
Seconded by Director Miller

### **WMC.2014-2-3**

"That the Waste Management Committee receive the following correspondence:

-E-Mail from: Brenda Black, Environmental Protection Officer, BC Ministry of Environment, Re: Manson Creek Landfill Conference Call Discussion and Inspection Pictures;  
-Letter to: Brenda Black, Environmental Protection Officer, BC Ministry of Environment, Re: Manson Creek Landfill- February 12, 2014 Conference Call Follow-up;  
-Letter to: Brenda Black, Environmental Protection Officer, BC Ministry Of Environment, Re: Response to Inspection of Manson Creek Landfill on September 6, 2013;  
-Letter from: Brenda Black, Environmental Protection Officer, Ministry of Environment, Re: Inspection of Manson Creek Landfill on September 6, 2013."

(All/Directors/Majority)

**CARRIED UNANIMOUSLY**

**NEW BUSINESS**

Vanderhoof Transfer Station  
Fire on February 4, 2014  
-Update

Ms. Dougall mentioned that Rory Mackenzie, Environmental Services Operations Manager is meeting today (March 6, 2014) with a specialized insurance adjustor to evaluate the damage to the walking floor trailer caused by the fire that occurred on February 4, 2014.

The RDBN tridem wood waste haul trailer is being used to temporarily replace the damaged walking floor trailer. It has been indicated to the RDBN that if a replacement trailer is required to continue operations, costs will be covered under the claim process.

The Vanderhoof Transfer Station building is still black and when temperatures allow, clean-up will be completed in the spring of 2014.

**ADJOURNMENT**

Moved by Director Stoltenberg

WMC.2014-2-4

"That the meeting be adjourned at 12:51 p.m."

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Taylor Bachrach, Chair

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Wendy Wainwright, Executive Assistant



## REGIONAL DISTRICT OF BULKLEY-NECHAKO MEMORANDUM

To: Chairperson Bachrach and Waste Management Committee (May 1, 2014)

From: Janine Dougall  
Director of Environmental Services

Date: April 22, 2014

Subject: Implications of Proposed Draft Second Edition Landfill Criteria for Municipal Solid Waste on RDBN Landfill Facilities

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The Ministry of Environment has released for comment the Draft Second Edition Landfill Criteria for Municipal Solid Waste ("Landfill Criteria"). The intent behind the Landfill Criteria are to update the previously established guidelines which have been in effect since 1993.

At the March 6, 2014 Waste Management Committee meeting, the proposed Landfill Criteria were presented with preliminary concerns raised by RDBN staff regarding the potential cost implications to meeting the criteria as outlined in full. At the March 6, 2014 Waste Management Committee Meeting, direction was provided to staff to bring forward cost estimates for RDBN facilities meeting the criteria.

Since the March 6, 2014 Waste Management Committee meeting, RDBN staff have had the opportunity to discuss the Landfill Criteria with other Regional District staff as well as Ministry of Environment staff. The majority of these conversations have occurred through conference call as well as through attendance at the SWANA conference in Vancouver on April 2-4, 2014.

### ***Ministry of Environment Perspective***

It has been indicated by Ministry of Environment (MoE) staff that the intent behind the proposed Landfill Criteria is to update the 1993 guidelines to more current landfill design standards and to "set the bar high" with respect to expectations regarding design and operation of landfills in BC. It was also indicated that the Landfill Criteria were designed to provide guidance across the Province to both landfill operators and MoE staff in an effort to standardize landfill design and operation. The Landfill Criteria however are meant to be guidelines only and would not become a regulatory requirement unless incorporated into landfill operational certificates. The decision as to whether to change the operational certificates for existing landfills would be left to local MoE pollution prevention staff. It was also indicated that some of the wording in the proposed Landfill Criteria would only be applicable for new landfills while exclusions or deviations from the design standards would be considered by MoE with sufficient rationale from a qualified professional.

A copy of the presentation made by Natalia Kukleva, Project Lead, MoE, at the SWANA conference is attached to this memo for additional information. The MoE has also indicated a desire to have the Landfill Criteria finalized by the fall of 2014.



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### ***Regional District Perspective***

The most significant concern associated with the proposed Landfill Criteria is the applicability of the guidelines. Although the policy branch of the MoE has indicated that the guidelines are just that, guidelines, there is concern that with the restructuring of the MoE, this will result in the guidelines being incorporated into operational certificates more often than not and even in situations where current landfill operations are not resulting in significant environmental impacts. Due to this, there is concern that significant costs (eg. consulting fees) will be incurred by landfill operators in convincing the MoE that existing landfills are being designed and operated effectively under the 1993 guidelines as opposed to meeting the new standards.

From other Regional Districts within the Province, concerns have also been raised with respect to the inclusion of wording surrounding the Contaminated Sites Regulation. More specifically, what impact this may have on facilities in the future should a new site use be considered for a facility that was not originally planned for in the original closure plan.

### ***Implications to RDBN Landfills IF Guidelines Become Regulatory Standards***

Should the language proposed in Landfill Criteria be added to the operational certificates for RDBN landfills, significant costs will be incurred in meeting the standards. The following section breaks down, on a per site basis, the potential implications and provides associated costs where these costs can be reasonably estimated. Please note that it has been indicated by MoE staff that the proposed Landfill Criteria would not be applicable for previously closed landfills and as such the following analysis only considers the Knockholt Landfill, Clearview Landfill and Manson Creek Landfill.

### **General Requirements of Concern - Impacting All Facilities**

Please note that there are concerns with much of the wording included in the Landfill Criteria, depending on the interpretation and applicability of the wording. The length of this report would be substantially longer if all concerns of staff were noted. As a result, the following are the most significant concerns identified.

A Landfill Criteria Upgrading Plan is required to be completed within 5 years. This report is to compare current landfill design and operations to the new standards and is also to lay out a plan of how and over what period of time the landfill is to come into compliance with the new standards. MoE staff have indicated that it is in this report that requests for modifications or exclusions to the new standards would be considered. The cost for completing the Upgrading Plan is difficult to estimate as the costs will be dependent on if exclusions to the Landfill Criteria are requested. A minimum cost however is projected to be between \$5,000-\$15,000.

In addition to the Landfill Criteria Upgrading Plan, there are a number of additional reports required. The costs presented below are very rough estimates. Actual costs would be dependent on previous studies completed and results of negotiations with MoE. Also, please note that the costs presented are for plan costs only and do not include any infrastructure costs associated with implementation of the finalized and approved plans:

- Hydrogeology and Hydrology Characterization Report (\$30,000 - \$75,000) – costs are



dependent on previous work completed. Cost estimates presented would be for a site with limited existing data.

- Construction reports are to be prepared after the construction and/or significant modification of landfill facilities. Reports are to include all inspection and quality assurance/quality control testing results, and as-built record drawings showing the lines, grades, and as-built elevations of the landfill. Costs of report preparation would be dependent on complexity of work completed.
- Design, Operation and Closure Plan (\$25,000 - \$40,000 for development of a new Plan) – To be reviewed and updated at least once every 5 years. The DOC Plan is to include (not a complete list):
  - Geotechnical and Seismic Assessment
  - Groundwater and Surface Water Impact Assessment
  - Filling Plan
  - Progressive Closure Plan
  - Lifespan Analysis
  - Contaminating Lifespan Assessment
  - Surface Water Management Plan
  - Leachate Management Plan
  - Environmental Monitoring Plan
  - Facility Operations Plan
  - Fire Safety Plan
  - Emergency Response Plan
  - Contingency Plan
- Landfill Gas Generation Assessment (\$3,000). Under the Landfill Gas Management Regulation, landfills with 100,000 tonnes or more of waste in place or with an annual waste acceptance rate exceeding 10,000 tonnes are required to undertake an assessment of landfill gas generation and submit the results to the MoE. The Knockholt Landfill completed the initial assessment in the fall of 2010 and will be required to continue to complete the assessment every five years. An assessment for Clearview Landfill has not been completed as the annual volumes landfilled at the facility continue to be slightly below the 10,000 tonne threshold. It is anticipated that this analysis will be required in 2017 unless landfilled volumes increase at the site. This assessment is not anticipated to be an issue or requirement for the Manson Creek Landfill.
- Landfill Gas Management Facilities Design Plan. Required if the landfill gas generation assessment indicates that a landfill is estimated to generate annually 1000 tonnes or more of methane. Not applicable at this time to RDBN landfill facilities.
- Annual Operations and Monitoring Report (\$5,000-\$15,000)

In addition to the above report requirements, the Landfill Criteria include wording requiring installation of security fencing around the entire perimeter of the landfill on the landfill site



boundary. The RDBN typically only installs security fencing and bear fencing around landfill facilities in a phased fashion. The fence system ultimately increases as additional phases of the landfill are developed. Should this requirement have to be met in full, this will increase costs for the construction of the fence line and annual operation costs for maintenance. A typical electric bear fence installation cost ranges between \$20-\$30/m. This cost does not include land clearing and ground preparation costs.

Application of final cover soil is to be completed within 180 days on any part of the landfill footprint at final contours. This requirement is challenging and unrealistic for some landfills in BC, especially those located in Northern BC, where the construction season is very limited for this type of work. For RDBN sites, closure works are currently completed in a phased fashion and for areas sized sufficiently to be practical and cost efficient.

Post closure care requirements – the 1993 guidelines specify a minimum post closure period of 25 years. This has been increased to a minimum of 30 years with a default of 1000 years if a contaminating lifespan assessment has not been completed.

The Landfill Criteria general prohibits the open burning of wastes, however open burning of clean wood and yard waste may be approved if it can be demonstrated that there is no viable alternatives such as reuse, recycling, energy recovery or composting. The submission of a technical assessment report satisfactory to the director is required and the approval must be included in the operational certificate for the facility. There is no indication in the Landfill Criteria of what the technical assessment report is to include as far as content therefore a cost estimate cannot be provided at this time.



### Knockholt Landfill – Specific Areas of Concern

The Knockholt Landfill is an engineered landfill that includes a naturally occurring clay liner, leachate collection and treatment system. When a new phase of landfill is developed, the clay liner is used as the primary barrier on top of which is placed in an engineered pattern, geotextile fabric, leachate piping and drainage rock (see photo below). The leachate collection and treatment system currently includes a facultative storage lagoon and polishing wetland.

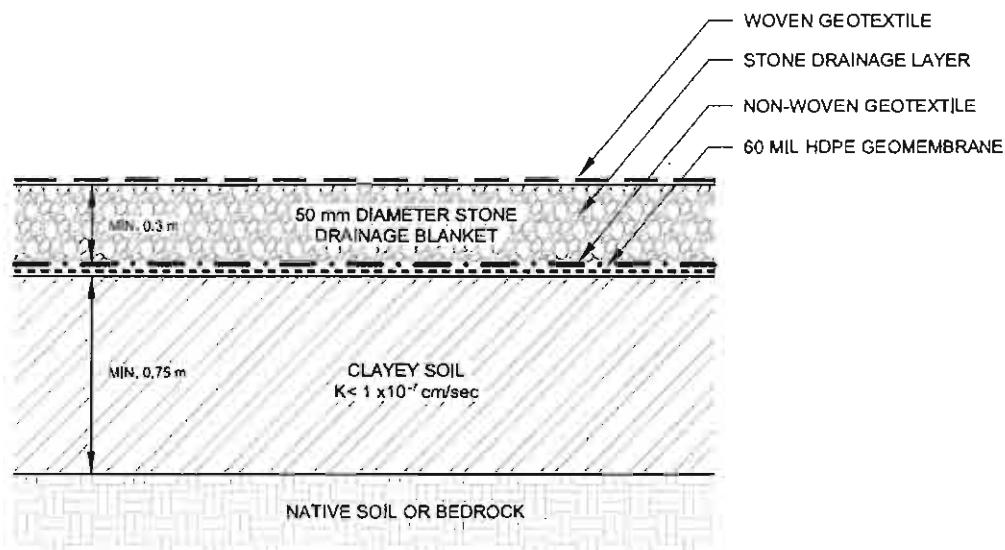


- The current design of the Knockholt Landfill liner system does not meet the standards outlined in the Landfill Criteria. The Landfill Criteria require the use of a High Density Polyethylene (HDPE) liner on top of a clay liner (see figure 5.3 below). The use of an HDPE membrane as part of the liner design will increase phase development costs significantly at the facility. It is estimated that the liner design required by the new Landfill Criteria will at minimum double the costs of future phase development. To put this into perspective, the RDBN completed the phase 2C development project at the Knockholt Landfill in 2012. The area of development was approximately 5,000 m<sup>2</sup> and the cost was



\$200,000. The expansion work was estimated to provide an additional 5 years of landfilling life to the Phase 2 area.

### Landfill Base Liner System As Outlined in Landfill Criteria



#### LANDFILL BASE GRADES

- MINIMUM 2% GRADE PRIMARY DRAINAGE PATH
- MINIMUM 0,5% GRADE SECONDARY DRAINAGE PATH

#### NOTE

- GEOCOMPOSITE CLAY LINER CAN REPLACE CLAYEY SOIL LINER IF EQUIVALENT OF BETTER PERFORMANCE CAN BE ACHIEVED

figure 5.3  
**LANDFILL BASE LINER SYSTEM**

### Clearview Landfill – Specific Areas of Concern

The Clearview Landfill is currently being operated as a natural control landfill and was sited, designed and constructed based on the 1993 guidelines. A natural control facility means that there is no leachate collection or treatment system constructed and that the underlying soils are utilized as the treatment medium. Although this design model saves money on liner installation costs, a significant amount of monies have been spent by the RDBN determining the hydrogeology of the site and installing a significant number of groundwater monitoring wells.

- The most significant implication of the new Landfill Criteria is that natural control landfills are no longer listed as an acceptable landfilling design option. This will result in either more monies being spent by the RDBN to try and convince the MoE that the Clearview Landfill as designed is acceptable, or additional monies will be spent in constructing liners,



completing a leachate management plan and constructing leachate collection and treatment infrastructure. It should be noted that a contingency plan for the construction of a leachate collection and treatment system at the Clearview facility has been considered should the underlying soils not have sufficient treatment capacity.

- Currently at the Clearview Landfill, through authorizations in the Operational Certificate, the RDBN has the ability to open burn both clean wood products and construction/demolition wood waste materials as long as they are clean and free of plastics, insulation, rubber, tars etc. The burning of nuisance-causing combustibles such as sawdust, yard wastes, mulch, wood chips and stumps is prohibited. The open burning guidelines proposed in the Landfill Criteria will impact operations at the Clearview Landfill in that more wood waste will have to be landfilled as the burning of clean construction/demolition wastes would no longer be authorized.

#### Manson Creek Landfill – Specific Areas of Concern

The Manson Creek Landfill is a very small and isolated landfill located north of Fort St. James. The population serviced by the facility is seasonal in nature with the majority of waste deposited at the site during the summer months. The site is operated as a natural control facility and the RDBN does not currently conduct environmental monitoring activities nor produce an annual report for the MoE. There have been recent concerns raised by the MoE with bears accessing facility. Should the requirements of the Landfill Criteria be implemented at this site, the cost implications would be significant and make continued operation of the site simply not economically feasible.

#### Summary

It is clear that the Ministry of Environment is attempting to standardize and set the bar very high with respect to design and operation of landfills in BC. Costs for landfill development and operation in BC will increase as a result of the implementation of the proposed Landfill Criteria as currently written.

Although MoE staff have indicated that there will be opportunities to request exclusions to the new standards, this process has not been clearly outlined in the Landfill Criteria document. And concerns still remain as to how the Operations Branch of the MoE will ultimately implement the guidelines across the Province.

The implications of the Proposed Draft Second Edition Landfill Criteria for Municipal Solid Waste for the RDBN could range from fairly minor, if operational certificates are not changed, to very significant, if wording from the proposed guidelines are integrated in the landfill operational certificates. Additional costs will be incurred in all aspects of landfill operation and design including annual operation costs, consulting fees, report preparation and infrastructure development. With a limited tax base, there is further concern that these additional costs for landfill operations will ultimately reduce the ability of the RDBN to implement other services including additional waste reduction efforts.



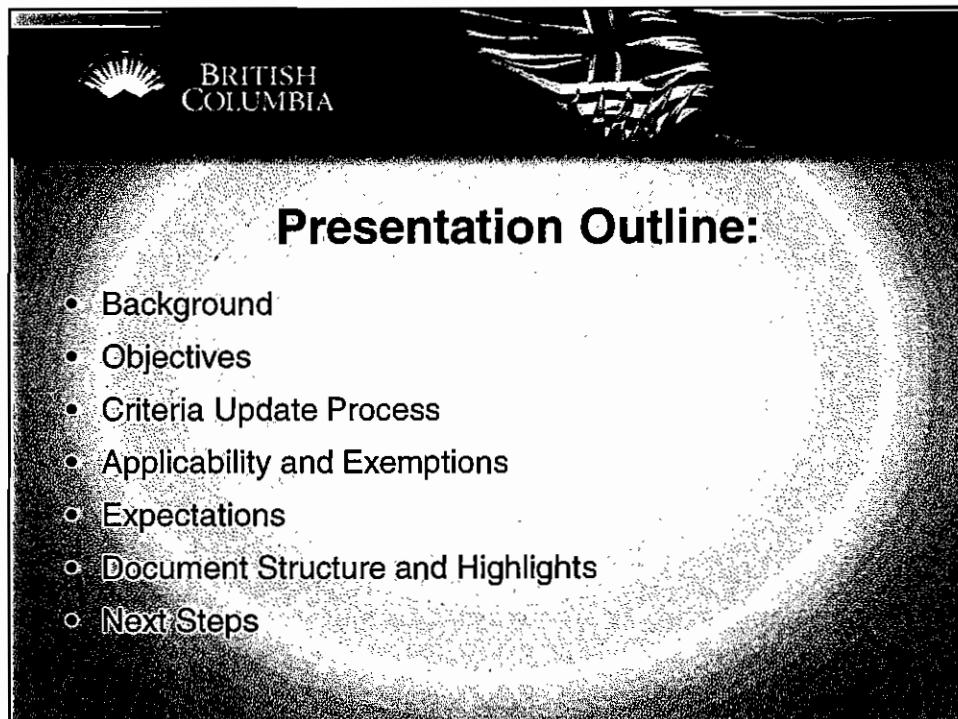
The time period for submission of comments regarding the Landfill Criteria ends on May 31, 2014. Staff recommend that a letter be submitted to the Ministry of Environment which outlines the concerns of the RDBN with the Landfill Criteria as written.

RECOMMENDATION	(All/Directors/Majority)
<ol style="list-style-type: none"><li>1. That the RDBN Waste Management Committee receive the memorandum titled, "Implications of Proposed Draft Second Edition Landfill Criteria for Municipal Solid Waste on RDBN Landfill Facilities" and dated April 16, 2014.</li><li>2. Further, that the Waste Management Committee recommend to the Board of Directors to direct staff to submit a letter to the Ministry of Environment, by May 31, 2014, outlining the concerns of the RDBN with the Proposed Draft Second Edition Landfill Criteria for Municipal Solid Waste as currently written.</li></ol>	

Respectfully submitted,

A handwritten signature in blue ink that reads "Janine Dougall".

Janine Dougall  
Director of Environmental Services





## Background

- Guidance document for landfill owners, qualified professionals and the Ministry of Environment
- Landfill Criteria were completed in 1993 and not updated until now
- New standards and operating procedures for landfills consistent with current industry and ministry practices
- Link to Landfill Gas Management and Contaminated Sites Regulation

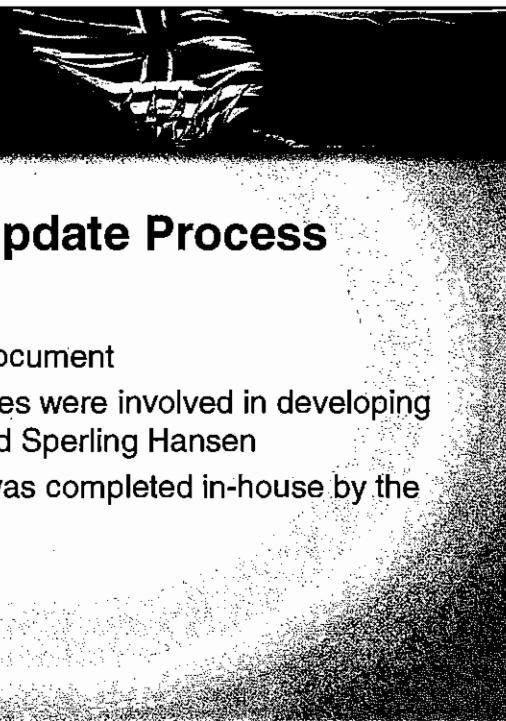


## Objectives

- Basis for consistent decision making
- Clarity and consistency in regulatory approach province-wide
- Leading practices for environmental protection
- Flexibility based on equivalency
- Waste reduction promotion



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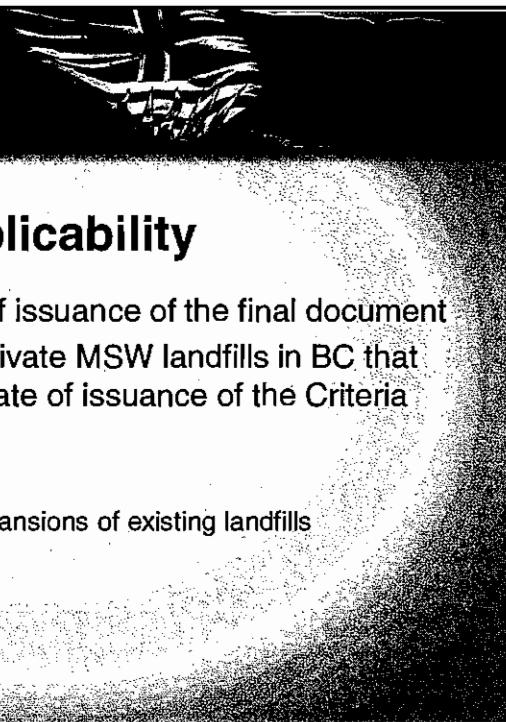


## Criteria Update Process

- Jurisdictional scan
- Review of the existing document
- Two consulting companies were involved in developing the document – CRA and Sperling Hansen
- Interim Second edition was completed in-house by the Ministry team



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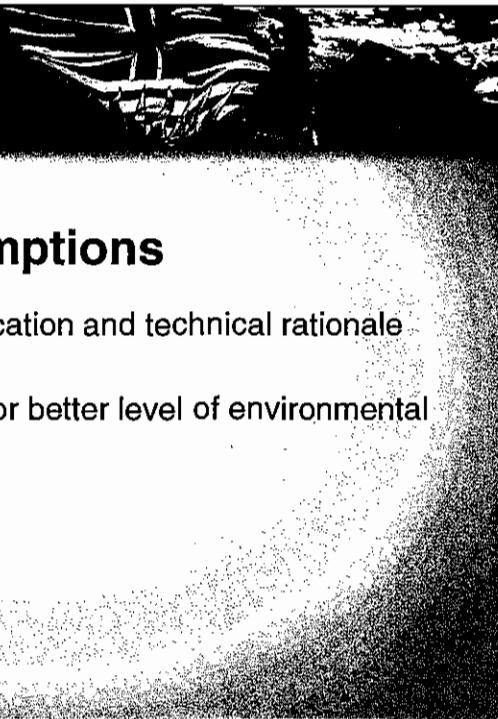


## Applicability

- Effective from the date of issuance of the final document
- Apply to all public and private MSW landfills in BC that receive MSW after the date of issuance of the Criteria
- Includes
  - New landfills
  - Lateral and/or vertical expansions of existing landfills
  - New active landfill phases
  - Existing landfills



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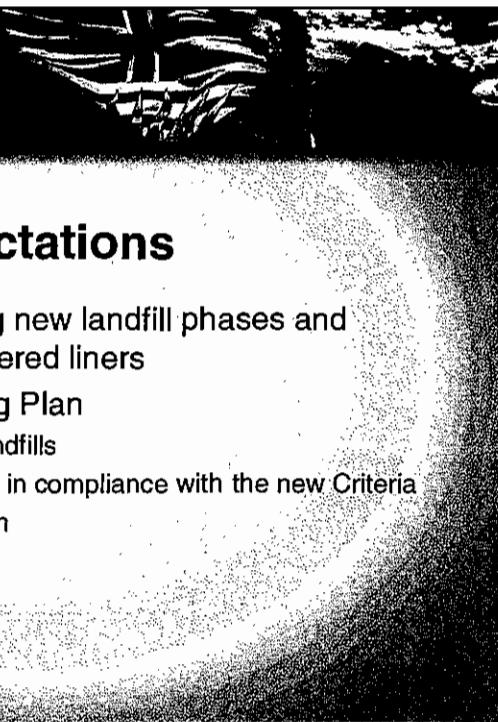


## Exemptions

- Require significant justification and technical rationale completed by QP
- Demonstrate equivalent or better level of environmental protection



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## Expectations

- All new landfills (including new landfill phases and expansions) have engineered liners
- Landfill Criteria Upgrading Plan
  - Status check of existing landfills
  - Bring non-conforming sites in compliance with the new Criteria
  - Timeline for implementation

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## Expectations (cont'd)

- Open Burning generally prohibited
- Water quality criteria:
  - Wide range of applicable standards.
  - At landfill site boundary, or 150 m from landfill footprint, whichever is closer.

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## Siting

### Consider:

- Surrounding land uses
- Physical setting
- Sensitive receptors



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## Performance

Objectives for:

- Groundwater and surface water protection
- Leachate and gas management
- Nuisance avoidance

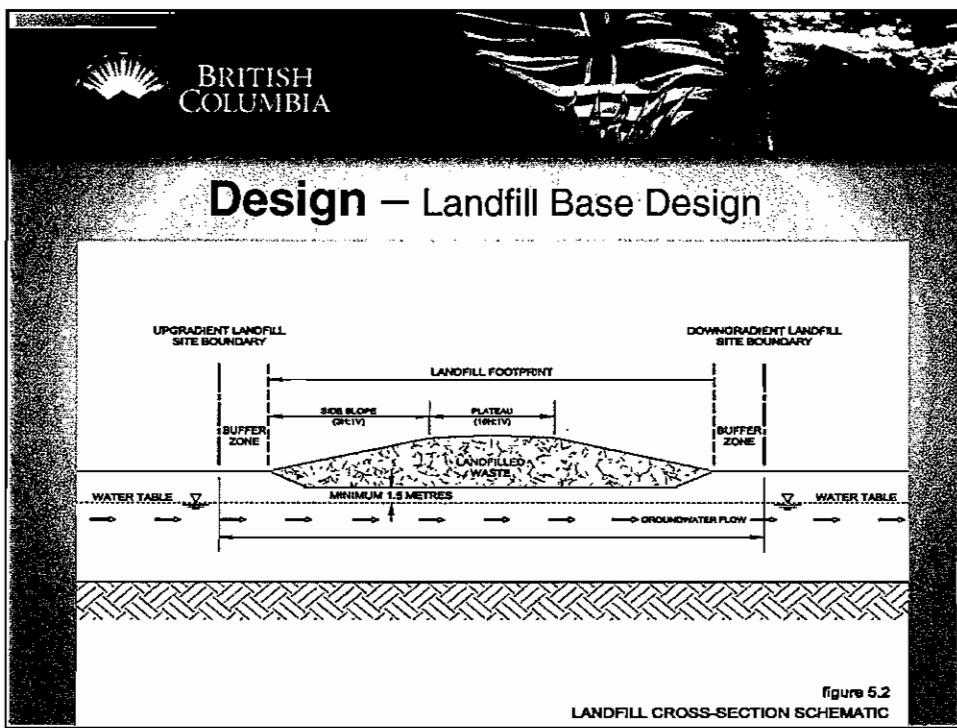
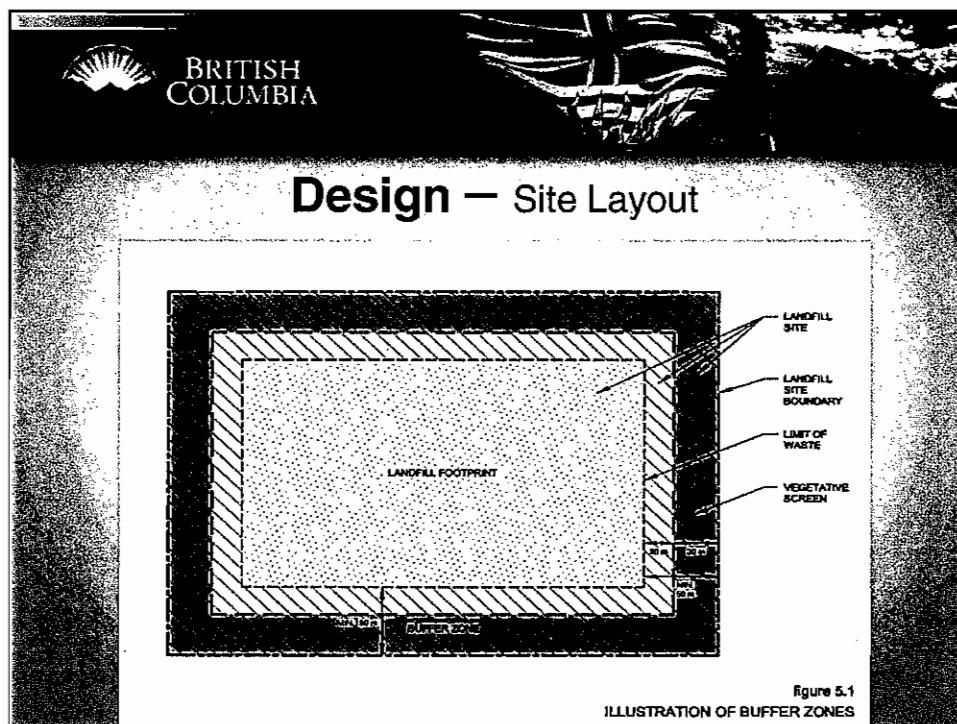


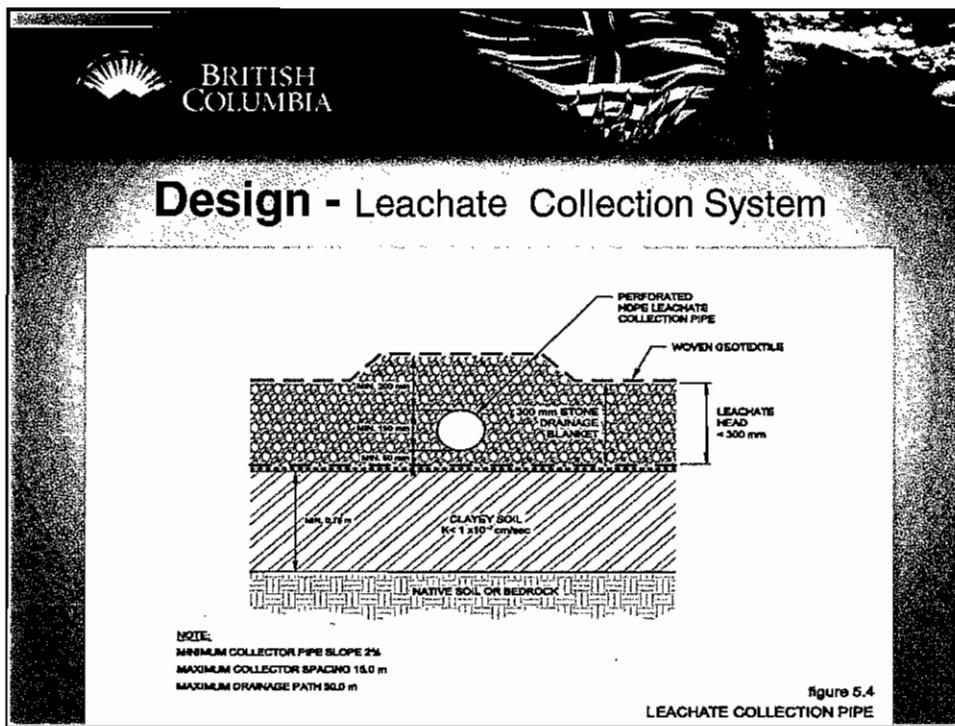
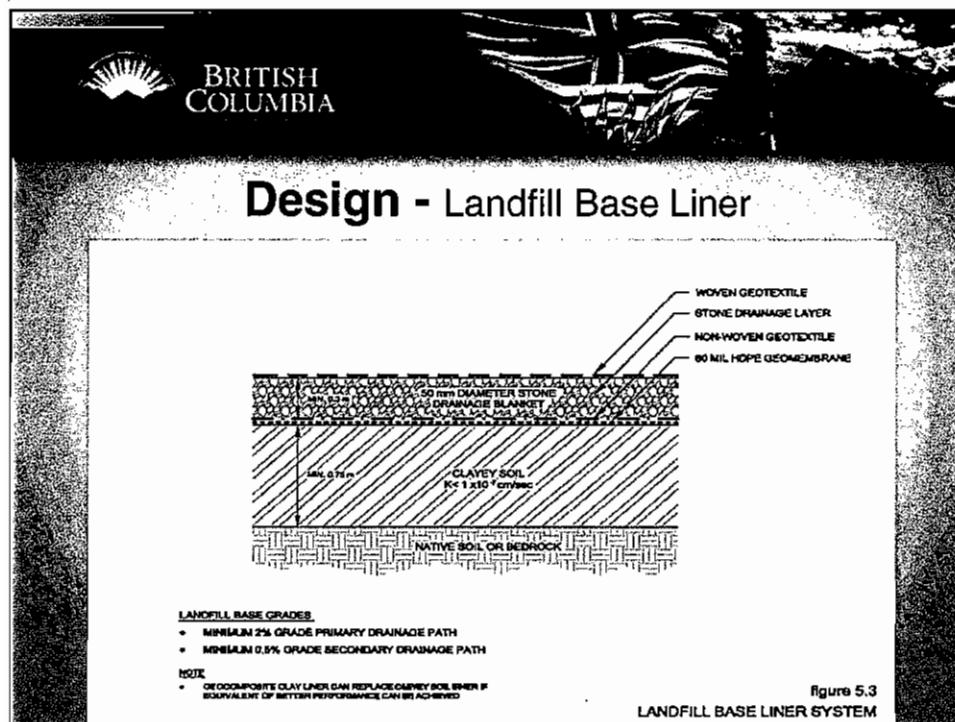
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## Design

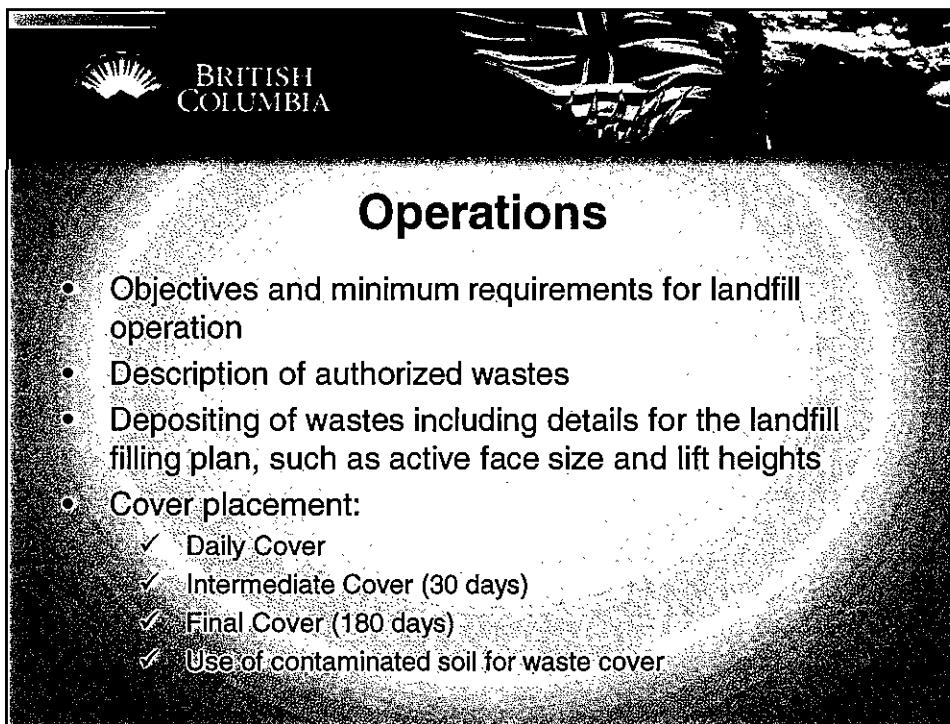
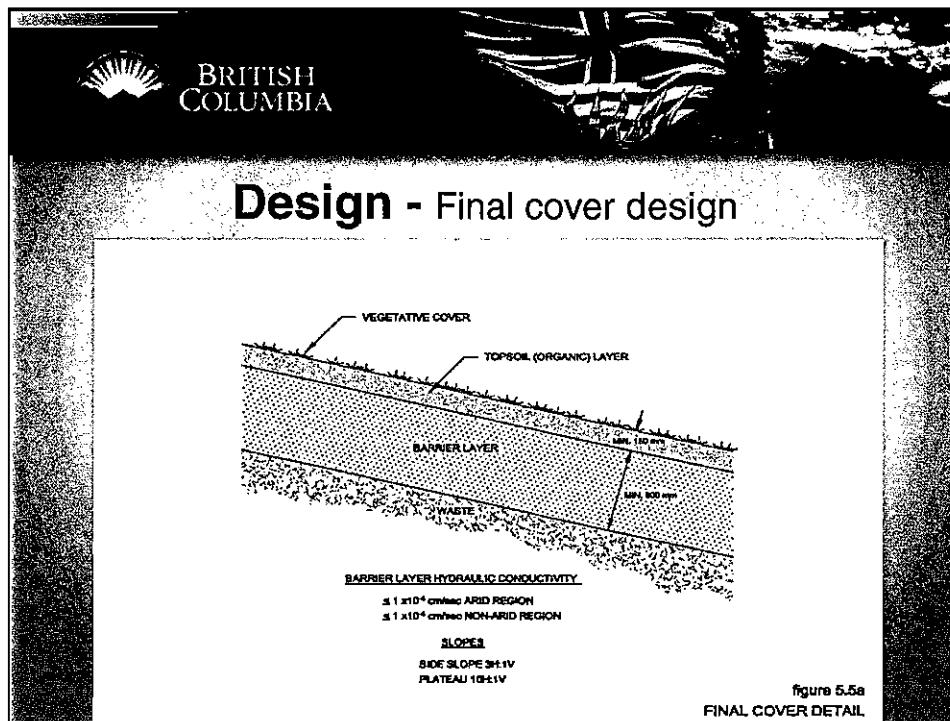
- Objectives and minimum requirements
- Must satisfy performance criteria
- Detail in Design, Operations and Closure Plan

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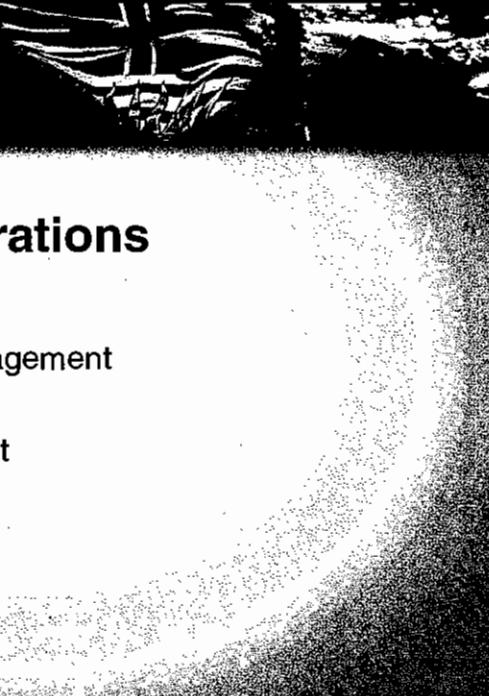


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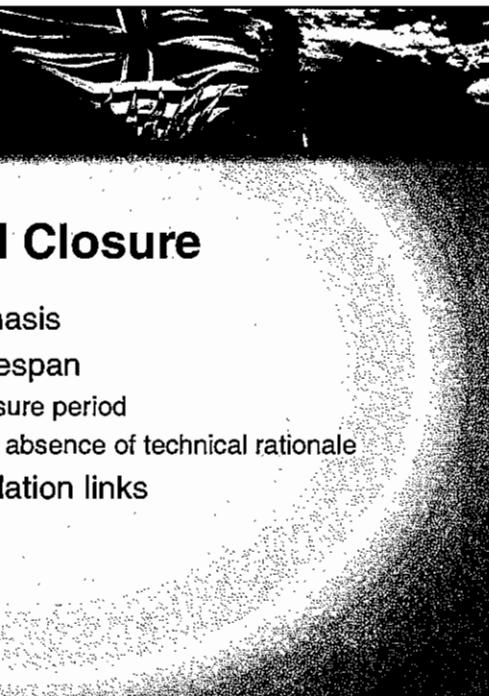


## Operations

- Nuisance controls
- Vector and Wildlife management
- Burning
- Landfill Fire management
- Signage
- Weigh scales
- Records
- Operator Training



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## Landfill Closure

- Progressive closure emphasis
- Landfill Contaminating Lifespan
  - 30 years minimum post-closure period
  - Default is 1000 years in the absence of technical rationale
- Contaminated Sites Regulation links



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## Financial security

- Required for all privately owned MSW landfills
- For publicly owned landfills a closure fund should be established
- Present value cost:
  - - closure
  - - post-closure
  - - contingency measures
- Post-closure period up to 1000 years
- Types of financial security



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## Monitoring

- Site specific monitoring plan design
- Leachate, groundwater, surface water and landfill gas monitoring
- Points of compliance
- Annual report
- Consistent with other plans and reports



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## Plans and reports

- Detailed content of all required plans and reports
- All assessments and reports must demonstrate how they will satisfy performance criteria
- Landfill Criteria Upgrading Plan
- Hydrogeology and Hydrology Characterization report
- Construction report
- Design, Operations and Closure Plan (DOCP)



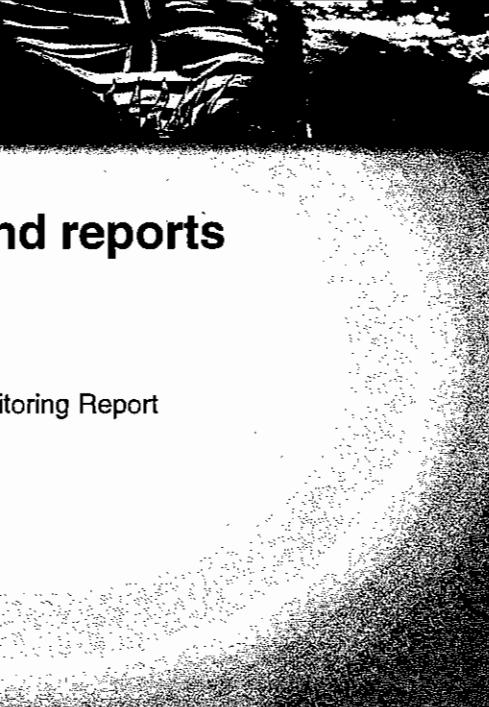
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## Plans and reports

- Design, Operations and Closure Plan (major highlights):
  - Geotechnical and seismic assessment
  - Groundwater and Surface Water Impact Assessment
  - Site Plan and Landfill Design
  - Filling Plan
  - Progressive closure Plan
  - Contaminating Lifespan Assessment
  - Surface Water Management Plan
  - Leachate Management Plan
  - LFG Management Plan
  - Closure Plan
  - Facility Operations Plan
  - Fire Safety Plan
  - Contingency Plan
  - Land Survey



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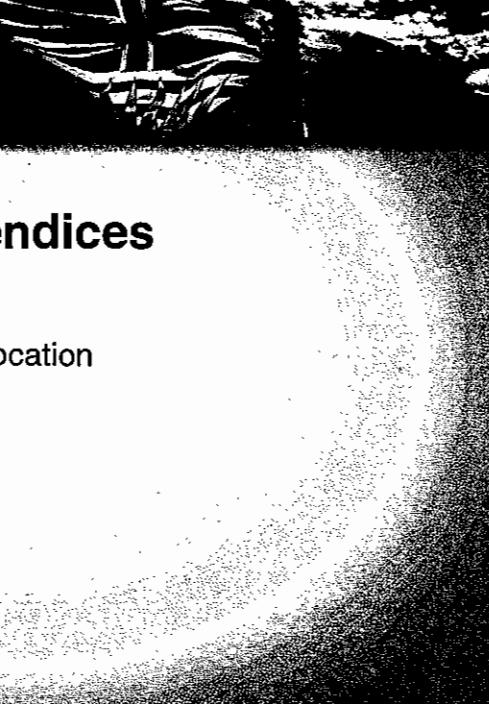


## Plans and reports

- Annual Report:
  - Annual Environmental Monitoring Report
  - Annual Operations Report



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## Appendices

- A: Landfill Filling Plan
- B: Contaminated Soil Relocation
- C: Open burning
- D: Bioreactor landfills

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## Next Steps

- Posted on ministry website – comments welcome by May 31, 2014
- Webinar/info sessions as needed to facilitate discussion and feedback
- Incorporate comments, finalize and post the final Second Edition



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## Contact information

**Natalia Kukleva – Project Lead**

- Environmental Management Officer, Clean Communities Section, BC Ministry of Environment
- (250) 356-9834, [Natalia.Kukleva@gov.bc.ca](mailto:Natalia.Kukleva@gov.bc.ca)

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# THE PRINCE GEORGE CITIZEN

Expanded service unaffordable for now: MMBC

Charelle EVELYN / Prince George Citizen

April 18, 2014 04:26 AM



MULTI  
MATERIAL  
BC

NVA Photograph By NVA

An extension of services for the regional district outside of the city boundary will require more businesses to sign on to their program, said the spokesperson for Multi-Material B.C.

Allen Langdon, MMBC managing director, said the organization - representing the businesses responsible for collection of packaging and printed paper under B.C.'s new recycling rules - can't afford to expand beyond what's currently set out for the program right now.

As of September, curbside recycling will begin in Prince George. The city, like the Regional District of Fraser-Fort George, did not sign on with MMBC to become a contractor so the organization put the service out for bid to a private collector. No arrangements were made for collection throughout the rest of the regional district, leaving the local government holding the bag for providing service despite the province mandating it as the responsibility of the producers effective May 19.

"For us to add any more collectors at this point would mean our existing members would be subsidizing businesses that have not yet discharged their obligations," Langdon told members of the board's environment and parks committee Thursday morning. "I'm not sure you should be looking at MMBC to provide a solution, but rather look at the other businesses that have not yet joined or discharged their obligations as to what a solution might be."

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MMBC has reached collection agreements with 67 local governments, 13 First Nations and 90 private companies to proving recycling services for roughly 1.25 million households in 88 B.C. communities.

During the morning committee meeting, directors had to decide what to do with a staff report outlining the potential to extend the regional district's multi-material recycling contract with Cascades Recovery for past the May 31 expiration date. Staff recommended adding an extra year to ensure rural residents would still have recycling service. Other options including letting the contract run out at the end of next month, or extending it only until September when curbside collection begins in Prince George.

City directors wanted to drop the hammer and show the province how that the MMBC program wasn't working by applying political pressure in the form of putting a stop to taxpayer-funded recycling.

"I find it extremely discouraging that we are being asked now to charge our residents and our businesses to provide services that are supposed to be provided by MMBC," said Cameron Stoltz, who put tried to get support for the option to extend the contract only through September and said that the other options were "morally offensive."

"At the end of the day, when I'm looking at this, we need to be very visible and vocal in what we are standing up for," he said. "Rural communities have been screwed over and over again."

But going down that road would leave those rural communities with nothing in the interim.

"Although I agree with director Stoltz that we need to put on political pressure, in the meantime smaller communities like Valemount, Mackenzie and McBride, we then have a big problem on our hands," said Mackenzie mayor Stephanie Killam. "And we don't have the money to be able to do this kind of stuff."

If they went with the year-long extension, that sends the signal that they're okay with the service as provided by MMBC, said Prince George Mayor Shari Green.

"[The B.C. government] is forcing this regional district into a corner, which I don't appreciate," she said.

Stoltz's motion was ultimately defeated and the committee passed a recommendation for the year-long extension to the full board.

"It's unacceptable to me that we should be even contemplating this - not recycling in the rural areas just to show them we mean business," said committee chair and Area G director Terry Burgess. "No one wants to throw up their hands and say recycling in the rural area is over. In the end, it's bush league economics we don't have some system in place outside of Prince George that encourages recycling because then the recyclables will end up in the landfill. It's a lose-lose situation."

When the matter was raised again in the afternoon session, Stoltz repeated his desire to not extend the contract, which was supported by Green and Dave Wilbur.

The city has stood united with the regional district from the get-go, Green said. Holding off on pursuing their own recycling program when they could have started one before the province changed the regulations.

But that's easy enough for the city to say when they will still receive service via MMBC, whether they wanted it or not, come the fall, Burgess said.

"I think it's crazy to throw up our hands and say 'no, we're not going to do it anymore,'" he said.

"The rural folks need recycling, and that shouldn't be ignored," said chair Art Kaehn.

"We're saying we agree this is unacceptable for the rest of the region," Green clarified. "We need them to feel the pressure and they're not going to feel the pressure if we give them a pass for a year."

No decision was made on the contract, following a motion to postpone until next month's meeting to allow regional district staff to return with further information on the financial implications of the various options.

"A great wave of change is coming," said Valemount mayor Andru McCracken, who noted that conversation with MMBC had been divisive. "As the discussion continues, let's not ask for things that are impossible."

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REGIONAL DISTRICT OF  
BULKLEY NECHAKO

C/O Recycling Council of British Columbia  
Suite 10 – 119 West Pender St.  
Vancouver, BC V6B 1S5

April 8, 2014

Janine Dougall  
Director of Environmental Services  
Regional District of Bulkley-Nechako  
37 – 33<sup>rd</sup> Ave  
Burns Lake, BC V0J 1E0

RE: SABC 2013 Action Plan Comments

Dear Janine:

Thank you for your support and thoughtful input on our Action Plan. We have always appreciated your participation and interest in our EPR programs in the past and look forward to continuing that good working relationship.

You raise a number of points and I will try to respond to them all below. To make that easier to track, I will use the numbering system from your submission.

#### **1. Program Performance**

Item a – First, thank you for the positive comments about our initiatives. The topic of program performance covers many issues. Some of these are addressed in our Action Plan, but in our experience and from a practical perspective, others will only be worked out between individual parties, whether steward-to-steward or steward-to-Ministry.

#### **2. Collection and Operations Excellence**

Item a – Diversion of material from landfill is a mutual goal of local government and the stewardship programs. Much of our Action Plan was devoted to improving convenience and education for the consumer which are two of the keys to success that you raise. In addition, we feel that cooperation between the SABC stewards and the local communities is another key to success in this area and we hope to continue to cooperate with the Bulkley-Nechako RD as we have in the past.

Item b – I am glad you asked for a clarification in this area. It was clearly not our intent to focus multi-program depots only in larger urban areas. At present, just about half of our Level 3 multi-program depots are located outside of the large urban areas and this will continue to be a focus. As you indicate, cooperation among the stewards can make depots practical in smaller communities where the economics of a single program may not make sense.

Item c – While SABC is providing a forum for Stewards to coordinate the efforts in areas like collection, each program is still ultimately responsible for their program and the way they deliver it. Some programs do not lend themselves to depot collection and others have strong, well-established return-to-retail programs. If you have issues with a specific program in this area, it would still be the best approach to work directly with that program for resolution.

Item d - Regarding your concern on communities with less than 4,000 in population, it was not our intent to exclude those communities from service. That number is used to establish where we will have depots, but the market area covered by those depots naturally serve many of the smaller communities around them in the same way that other retailers in those towns serve surrounding consumers.

Through your own work with us, you are aware of the difficulty of siting depots even in population centers of more than 4,000. In our experience a population in the 4,000 range is required to support a free-standing depot. However, this does not mean that service is not available to smaller communities. As outlined in our standard, most smaller communities are within the 45 minute drive radius of depots located in these larger communities. Stewardship programs that meet the standard outlined in our Action Plan would provide service to over 97% of the province's population.

There are of course, communities in more remote areas of the province and we have been doing work in this area as well. The depots at Bella Bella and Ahousaht are examples where we have been able to partner with small communities to provide service to remote population bases much smaller than the 4000 outlined in the standard. We continue to be open to those opportunities in areas where there is interest.

Item e – Our intent in exploring ‘regularly scheduled’ events was to improve upon our existing collection event structure. For the most part these take place once or twice a year at random times. The idea with scheduling them would be to allow for consumers to plan and know when these would take place. The interval would be based on the amount of material available and amounts collected. It would not be practical to collect monthly and get 100 kgs. Conversely, it would make no sense to only do an annual collection that generated 2 truckloads.

Item f – Your points are noted. This is a complex issue that will require further discussion among all stakeholders before consensus is reached.

### **3. Education and Awareness**

Item a – We agree and are hoping to be able to address both ‘return’ and ‘global’ education as you indicate.

Item b – Stewardship organizations individually have the responsibility to build awareness of what is in their recycling programs. Through SABC, stewards are focusing efforts to reduce confusion regarding the different programs and to promote common collection locations. Many of our stewards do promote the theme of ‘waste as a resource not to be thrown away’ and will likely continue to do so.

Item c – We agree that the BC Recycles mark is a good concept that will help to promote recycling in the province. The practical application of how we will use the mark is the subject of a committee (David Lawes is the chair) that we have recently struck. They are looking at how best to incorporate this into

education and awareness activities, as well as how municipalities might be able to incorporate it into their activities. As to using the mark at depot locations, we have concerns that introducing a competing mark to existing brands in the market would create more confusion and not less. In addition, the cost to build a new mark to the level of recognition of the established depot brand would be prohibitive.

#### **4. Local Government Relations**

Item a – We certainly agree that further education of local government on the stewardship programs through UBCM would be desirable.

Item b – The coordination of our stewards' efforts in outreach to local government is something that we hope to improve going forward. Most of these interactions would involve a presentation to the local board (in the case of a regional district) which generally requires applying to be on the agenda. We would also want to incorporate time for meetings with staff into these trips.

Item c – At a high level, the goals you outline in this item are ones that we share. With that said, SABC's role in this will be to act as a conduit and coordinator for stewards. Service levels, depot operation, education and awareness, etc. are all mandates of each stewardship organization as outlined in their program plan. We believe that SABC can facilitate communication and coordinate on stewards' behalf but the responsibility in these areas will continue to lie with each individual stewardship program.

Item d – This is a good synopsis of the concept of stewardship responsibility. The discussion, for the most part, has revolved around defining 'reasonable service levels.' This is an area where it is unlikely that we will get 100% agreement. The standard we propose in the Action Plan would provide service to over 97% of British Columbians. Again, we understand that not everyone will be happy with that standard but it provides a common point of reference for the discussion of this topic as we go forward.

Item e – The purpose of our efforts in the waste characterization study is exactly what you suggest. We hope to get a better understanding of just how much material from the various programs is ending up in landfill.

Item f – This is a complex issue in which there is disagreement among stakeholders with respect to the principles involved and the degree to which actual outcomes will differ from intended outcomes. It will continue to be a discussion point within SABC and with stakeholders.

As I indicated earlier, we appreciate your input on our Action Plan and overall support of our initiatives. We look forward to continuing to work with you to improve EPR in the province.

Sincerely,

Craig Wisehart  
Chair, Stewardship Agencies of British Columbia

cc: Meegan Armstrong, Ministry of Environment



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BURNS LAKE, BC  
V0J 1E0

REGIONAL DISTRICT OF BULKLEY NECHAKO  
"A WORLD OF OPPORTUNITIES WITHIN OUR REGION"

January 13, 2014

**Comments Regarding Stewardship Agencies of BC - Action Plan to Enhance Extended Producer Responsibility in BC (2013 Action Plan)**

Prepared by: Regional District of Bulkley-Nechako (RDBN)  
Submitted by: Janine Dougall - Director of Environmental Services  
E-mail: janine.dougall@rdbn.bc.ca  
Telephone: 250-692-3195

The efforts and hard work of the Stewardship Agencies of BC are very much appreciated, especially given the difficulties in coordinating the actions of multiple agencies with varied products and collection systems. It is a very challenging time in solid waste management, from a government, industry and consumer perspective. Finding the right balance in the transition from historically local government managed recycling programs to industry led programs will continue to be an evolving process. Working together in a collective fashion will assist in the implementation of successful programs.

Without being directly involved in the discussion process that resulted in the presented document it is often difficult to appropriately interpret the intent or to have a correct understanding of the proposed wording. Having said this, the intent of the following comments are to assist in the development of appropriate (reasonable) and effective industry led extended producer responsibility programs in all areas of British Columbia.

**1. Program Performance**

- a. The initiatives by the BC Stewards to develop third party assurance for non-financial information as well as consistent annual reporting and a dispute resolution process are encouraged. It is also appreciated that the issue of program to program "free riding" has been identified and a committee is proposed to be formed to address this important issue. The results from this committee will be of interest to many stakeholders.

**2. Collection and Operational Excellence**

- a. Under the section "working group terms of reference" the understanding that the consumer must be provided with a simple, convenient and pleasant experience to achieve recycling is

**MUNICIPALITIES:**

SMITHERS FORT ST. JAMES  
VANDERHOOF FRASER LAKE  
HOUSTON TELKWA  
BURNS LAKE GRANISLE

**ELECTORAL AREAS:**

A - SMITHERS RURAL  
B - BURNS LAKE RURAL  
C - FORT ST. JAMES RURAL  
D - FRASER LAKE RURAL

E - OOTSA LAKE/FRANCOIS LAKE  
F - VANDERHOOF RURAL  
G - HOUSTON RURAL

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supported. The gap, however, that is missing that will ultimately result in recycling prevailing over disposal (landfilling) is the need to address the convenience level compared to disposal options. To be truly successful, industry led recycling programs must be perceived by the public to be more convenient than disposal at a landfill or transfer station. To achieve this, will take both commitment from the Stewardship Agencies of BC through the provision of adequate service levels and education as well as local governments in the implementation of material bans and other methods available to redirect the materials to the recycling opportunities provided.

- b. Regarding the Policy Objective for the Multi-Program Free-Standing, Collection Facility, it is concerning that these depots are to be focused on serving larger consumer populations where large amounts of material for diversion can be collected. The concept of multi-program depots is supported; however, the locations of these facilities should be expanded to include rural areas of the province that are currently underserviced. The concept of the "eco-depot" has been discussed numerous times with Stewards over the past number of years as a preferred methodology for servicing rural areas of the province in an effort to achieve economies of scale and convenience levels that would be considered as reasonable service levels. It is disappointing that the 2013 Action Plan document seems to be taking a step back on the efforts of local governments and Stewards that have been made to date in this area of service provision. Having said this, the efforts of the SABC to inventory the existing depots in the province and develop a ranking procedure to show the current state of multi-program collection facilities is very much appreciated. It is hoped that the compiled information will serve useful in the future to show a continued transition of level 1 to level 3 facilities.
- c. One of the primary challenges in the establishment of adequate rural service levels is that some SABC members do not support stand-alone sustainable business models for the collection of their product in all areas of the province. Those SABC members that do not provide adequate funding for stand-alone operations become free-riders on other SABC member programs or other businesses. There must be a commitment from all SABC members to implement business models that are stand-alone and sustainable even in rural areas of the province.
- d. With respect to your proposed accessibility standard for approved product stewardship plans, quite frankly, it is just not acceptable. If the definition is understood correctly, communities with less than 4000 population are not even considered for provision of service. For the RDBN specifically, under the proposed definition, the only two communities that would be defined as rural would be Smithers and Vanderhoof. This would leave 75% of the population or 29,324 residents (based on 2011 census numbers) in the RDBN excluded from service provision.
- e. With respect to regularly scheduled collection facility (underserviced areas), the concept of providing additional collection opportunities and having as many stewards coordinate



activities is supported. However, what is meant by regularly scheduled? This should be defined further as once per month may be acceptable for some program products while quarterly or twice a year collection facilities may not be viewed as acceptable service levels.

- f. Under the section "compensation to local government", again, it is argued that not all approved stewardship programs pay market rates that allow for the establishment of financially viable free-standing collection facilities in all areas of the province. It is agreed that funding public infrastructure should not be the mandate of stewardship programs, however, it is the mandate of stewardship programs to collect their product. Therefore, as infrastructure is required for product collection, the adequate funding of this infrastructure should be the direct responsibility of stewards. Whether the infrastructure is privately owned, non-profit, or government is irrelevant.
- g. It is appreciated that under the section "further initiatives" that the Stewards are committing to demonstrate that depot accessibility standards are being met.

### 3. Education and Awareness

- a. It is agreed that there needs to be improved education and awareness regarding industry led stewardship programs in BC. This improvement needs to be at both the public "return" level (ie. knowing that there is the ability to recycle a product and knowing where to take it) and at the more "global" level (ie. so consumers understand the transition from government fees and initiatives to industry led fees and initiatives).
- b. One of the challenges in educating consumers of the recyclability of materials is the fact that many products now covered under industry led recycling programs are not products that have been historically recyclable. Therefore, when a product reaches the end of its useful life, a consumer does not automatically think "recycle", more often "disposal" is the first reaction. Efforts must be made by the stewards in cooperation with other agencies and stakeholders to change this line of thinking. One suggestion is for the stewards to collectively support the concept of "waste as a resource not to be thrown away", and somehow integrate this into existing and future public education programs.
- c. The proposed concept of the Recycle BC mark is encouraged, as this is viewed as a good methodology in coordinating the activities of the Stewards and allowing those products readily recognized as recyclable to be associated with other products not so easily recognized as being recyclable. It is not understood, however, why the Recycle BC mark cannot be utilized as an identifier of existing or new collection facilities. It would be thought that the addition of this mark to existing identifiers could be utilized in a positive way as opposed to infringing on the historic branding efforts of stewards. It does not seem to make sense to go through all of the efforts and expense to create a common public mark if it is not going to be used everywhere.



#### 4. Local Government Relations

- a. The efforts to engage local government at the UBCM level is considered as a good initiative to address higher level issues associated with implementation and maintenance of industry led EPR programs. The BC Stewards should also consider utilizing the UBCM network as a vehicle for further education of all local governments of the transition in recycling program responsibility from government to industry.
- b. The efforts outlined to reach out to rural Regional Districts is also supported, however, it is important for the BC Stewards to recognize that these meetings need to be arranged well in advance to allow for a meaningful dialogue with Regional District Board Members and to make these trips cost effective.
- c. To make industry led EPR effective in all areas of the province, the BC Stewards need to commit to understanding how their recycling programs fit within the context of solid waste management programs on a Regional District level. There needs to be meaningful dialogue between local governments and the BC Stewards to develop a coordinated approach to the implementation of recycling programs which finds a balance between the economics and expectations of the taxpayer (consumer). The commitment by the BC Stewards to work effectively with local governments on a Regional level would go a long way in addressing many of the challenges currently facing EPR in BC, including establishing reasonable (convenient) service levels and greater public education and awareness.
- d. With respect to the section "Managing costs of stewarded products in municipal landfills" it is agreed that the BC Recycling Regulation is worded in such a way that it does not require the collection of 100% of the product on a provincial basis. The intent however, of the Recycling Regulation is to transfer the costs and responsibility for product recycling to the manufacturers of those products and requires that reasonable service levels be provided to all British Columbians.
- e. The establishment and use of a standardized waste characterization study is encouraged. It is hoped that the data generated from this work will provide all stakeholders with a better understanding of the flow (recycling versus disposal) of existing future EPR program products.
- f. The implementation of fully enforced landfill bans by local governments in rural Regional Districts can be challenging and in some instances cost prohibitive. Although potentially a very effective tool in the re-directing of products from disposal, bans cannot be implemented unless recycling opportunities are reasonable and appropriate. The BC Stewards indicate that they will not pay local governments for the products that enter their landfills, as it is claimed that this will discourage recycling and allow consumers to continue to dispose of products in landfill. This statement is made, it is assumed, given that there are adequate recycling opportunities available. A counter-argument to this would be that if the BC Stewards were responsible for paying for products ending up in landfills, especially in areas of the province



that are underserviced, these monies could be utilized by local governments to initiate and enforce landfill bans, public education programs, and augment service levels (eg. satellite bin at transfer station which is ultimately transported to local depot) to more reasonable forms.

Thank you for the opportunity to provide comments and feedback on the document "Stewardship Agencies of BC Action Plan to Enhance Extended Producer Responsibility in BC (2013 Action Plan)". Should you have any questions or require clarification on any of the comments made, please contact the undersigned at your convenience.

Sincerely,

A handwritten signature in black ink that appears to read "Janine Dougall".

Janine Dougall  
Director of Environmental Services

This document was approved for submittal to the BC Stewards and the BC Ministry of Environment by the Regional District of Bulkley-Nechako Board of Directors on January 23, 2014.

Signature of Endorsement:

A handwritten signature in black ink that appears to read "Bill Miller".  
\_\_\_\_\_  
Bill Miller - Chair, RDBN Board of Directors



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March 26, 2014

File: MR-8856

Ms. Janine Dougall  
Director of Environmental Services  
Regional District of Bulkley-Nechako  
Box 820  
Burns Lake, BC  
V0J 1E0

RECEIVED

MAR 26 2014

Dear Ms. Dougall:

**Re: Electric Fence Operation and Landfill Maintenance - 2014**

REGIONAL DISTRICT  
OF BULKLEY-NECHAKO

The Ministry of Environment will be conducting landfill site and electric fence inspections on a priority basis in 2014. Particular attention will be paid to:

1. whether bears have entered the site through the fence or gate;
2. strand tension;
3. voltage;
4. gaps greater than 10 cm;
5. landfill site conditions

Please be reminded that you are required to comply with the *Environmental Management Act* and the requirements of your authorization issued under the *Act* at all times. The Ministry of Environment has an escalating enforcement policy. Any non-compliance observed at the site listed above may result in escalating enforcement action.

The prevention of bear-human conflict and the protection of bears are issues of extreme importance to the Ministry, and we ask for your continued cooperation in achieving these objectives in 2014.

If you should have any questions about the upcoming season of planned inspections please contact me or Dan Brookes at (250) 847-7456.

Sincerely,

Julia Kokelj  
Environmental Protection Technician  
Ministry of Environment, Northern Region  
(250) 847-7353  
Julia.Kokelj@gov.bc.ca

cc. Eric Pierce, Ministry of Environment  
Dan Brookes, Ministry of Environment  
Kevin Nixon, Ministry of Environment, Conservation Officer Service Branch

Ministry of  
Environment

Skeena Region

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