



February 12, 2021

Robert Lapham, Chief Administrative Officer  
Capital Regional District  
625 Fisgard Street, Victoria BC  
PO Box 1000  
Via email: [rlapham@crd.bc.ca](mailto:rlapham@crd.bc.ca)

Dear Robert,

**Re: Draft Solid Waste Management Plan**

Thank you for the opportunity to provide feedback on the Capital Regional District's Draft Solid Waste Management Plan (SWMP). Victoria staff very much welcome the comprehensive and progressive range of strategies and actions and commend the inclusive and collaborative approach taken by your team in developing this highly important plan.

The development of the SWMP is well timed to complement renewed efforts to improve plastics management and recycling performance from the provincial and federal government. This region has a long-standing history and embedded community values of environmental stewardship and the SWMP positions the region as a leader in waste reduction and a facilitator for municipal collaboration around shared goals.

The City sees itself as a key stakeholder in the Hartland Landfill asset. It is estimated that one-third of the waste disposed at Hartland is generated by residents, businesses, industry and construction activities within Victoria. The City recently approved *Zero Waste Victoria*, which outlines 40 strategies to achieve a 50% reduction in waste disposal by 2040 with many of these aligning with strategic actions identified in the draft SWMP. It is also telling that 15 actions within the draft plan require direct involvement from CRD member municipalities to be successful and many more would benefit from municipal support and cross promotion.

Municipalities will play a vital role in meeting our regional solid waste targets, through the provision of their solid waste services and programs, and through the authorities granted under the *Community Charter* and *Local Government Act* that influence waste reduction. Available municipal tools include zoning, permitting, business regulation and nuisance regulation.

Victoria also has the authority to regulate land use, with existing permitting processes in place for development and construction and can influence the local market for reused and recycled construction materials through procurement as a land holder and purchaser, and through major expenditures for capital projects. Additionally, municipalities can influence the generation of solid waste in the community through regulations for the protection of the natural environment, subject to provincial approval.

There are opportunities for the CRD to leverage these municipal tools and authorities to maximize waste reduction potential and to this end, there are elements of the SWMP that are closely aligned with the City's own waste reduction goals and opportunities for local government collaboration.

This letter also provides recommendations for prioritizing actions under the SWMP to support the City's successful implementation of Zero Waste Victoria. Specifically:

1. Organics diversion
2. Construction, renovation and demolition material diversion
3. Supporting municipalities working towards zero waste and a circular economy

This will allow ongoing CRD/City engagement and collaboration and will create a framework for City staff to report back to Council on aligned strategies and planned implementation timelines.

## **1. ORGANICS DIVERSION**

Despite regional landfill bans in place for kitchen scraps and yard waste, high volumes of organic material continue to be landfilled and downstream enforcement is challenging. Approximately 6% of Victoria's GHG emissions (21,000 tonnes CO<sub>2</sub>e annually) are attributed to landfilled organic waste. Multifamily buildings and the commercial sector are responsible for about 85% of landfilled organic material generated in Victoria and improving source separation for this sector, including through regional harmonization, will be critical for reducing organics disposal.

Numerous BC jurisdictions have source separation guidelines or bylaws in place or planned, including the City of Surrey, Regional District of Nanaimo (RDN) and Metro Vancouver. Surrey's *Rethink Waste* organics collection service requires apartment residents to separate their organic waste from their regular household garbage. The RDN's Solid Waste Management Plan proposes to expand source separation requirements to all waste generators including businesses and multi-family residences. This action is supported through the licensing of waste haulers, which requires haulers to provide separated organics and recyclables collection. Metro Vancouver's Board has approved a commercial waste hauler licensing program, pending approval from the Minister of Environment and Climate Change Strategy, which aims to reduce waste and increase diversion at multifamily, commercial and institutional properties. Under the proposed bylaw, haulers will be required to provide their clients with bins for the separate collection of recyclables, organics and mixed municipal solid waste.

Improving source separation of waste materials is a short-term (2021-2023) priority action in Zero Waste Victoria and Victoria Council has explicitly directed staff to report back on options for increasing diversion rates for multi-family and commercial properties.

The CRD's SWMP highlights the importance of source separation requirements for multi-family and commercial waste diversion (Strategies 8.B and 9.F). The City has also heard strong support from local businesses and the community for consistent standards for private organics, recycling and waste collection. As part of implementing the SWMP, the CRD should create a model bylaw for such source separation requirements. This would support standardization across the region, consistent messaging and improved sorting behaviour.

To complement source separation requirements, the City of Victoria also supports shifting landfill disposal ban enforcement to the generator (Strategy 9.G). This action would increase compliance for current and future banned materials and avoid placing the burden of compliance only on haulers.

An additional challenge for organics diversion is inconsistent messaging for the acceptance of compostable and bio-based food service-ware and packaging at composting facilities. These materials represent significant waste management challenges and cause consumer confusion when sorting waste materials. Through engagement on Zero Waste Victoria, the City heard a desire from the business community for sustainable food service-ware purchasing guidelines that align with regional composting capacity.

Increased diversion of organics will require additional capacity for organics processing, preferably within the region and the City of Victoria is committed to working collaboratively with the CRD to support this essential infrastructure.

- **RECOMMENDATION:** That the CRD accelerate the creation of requirements for source separation in multi-family residences and commercial businesses, including through a model bylaw, to promote consistent messaging and compliance.
- **RECOMMENDATION:** That the CRD accelerate the development of guidelines for the use and acceptance of compostable and bio-based food service ware.

## **2. CONSTRUCTION, RENOVATION AND DEMOLITION MATERIAL DIVERSION**

Material from the construction sector makes up between 23 and 37%<sup>1</sup> of Victoria's landfilled waste. Regionally, wood and wood products comprise 64% of waste from the construction and demolition sector disposed at the Hartland Landfill. Zero Waste Victoria includes several strategies to reduce waste from the construction sector, including requiring the salvage of reusable materials from building demolition, requiring recycling of other construction waste, and strengthening reuse markets for building materials.

Increasing local salvage and reuse of building materials presents new economic opportunities. A study produced for the Vancouver Economic Commission estimates that wood salvaged through deconstruction (i.e., dismantling rather than traditional demolition of buildings) in Metro

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<sup>1</sup> Exact quantity not known. Between 50 and 75% of construction waste is estimated to leave the region and therefore not included in the reporting of material at the Hartland Landfill.

Vancouver is worth up to \$340 million per year. Salvaging building materials will also create new jobs, including low-barrier and entry level employment.<sup>2</sup>

Complementary action by the CRD can accelerate diversion and salvage of valuable demolition materials, as the SWMP highlights. Specifically, the City of Victoria strongly supports the implementation of a clean wood waste ban and surcharges for mixed loads from the construction sector that contain recyclable or salvageable materials (SWMP Strategies 12.E and 12.F). The City also supports the CRD leading the development of, and facilitating regional collaboration on, policy and tools to support construction waste diversion (Strategies 12.B and 12.D). Additionally, collaborative action is needed to identify further opportunities to support material reuse markets in the region.

Waste stream management licensing is crucial for improving construction waste diversion. Waste stream management licensing has been shown to enable and support municipal tools and compliance in the lower mainland. For example, Metro Vancouver tracks construction and demolition waste through facility licensing under the Municipal Solid Waste and Recyclable Material Regulatory Bylaw which in turn supports member municipalities' construction and demolition recycling rules. The City of Victoria strongly recommends that the CRD prioritize the establishment of waste stream management licensing (Strategy 6.C). Facility licensing will provide crucial compliance tools for regulation of waste from the construction sector by the City of Victoria.

As an additional overall benefit, waste stream management would assist in tracking progress on the SWMP and municipal strategies, and support waste reduction through data disclosure and better understanding of material flow in the capital region.

- **RECOMMENDATION:** That the CRD establish a waste stream management licensing bylaw for private solid waste transfer stations and recycling facilities operating in the region.
- **RECOMMENDATION:** That the CRD prioritize implementing bans and/or surcharges for clean wood waste and mixed construction waste at the Hartland Landfill.
- **RECOMMENDATION:** That the CRD prioritize work with member municipalities to develop requirements and guidelines for construction waste diversion, including measures to grow the regional market for salvaged construction and demolition materials.

### **3. SUPPORTING MUNICIPALITIES WORKING TOWARDS ZERO WASTE AND A CIRCULAR ECONOMY**

Regional District and member municipality waste reduction efforts are complementary and interdependent. Within this response to the draft Plan, we have sought to highlight the important role that municipalities play in reaching regional waste reduction targets. The success of Zero Waste Victoria depends on the CRD undertaking robust implementation of the SWMP.

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<sup>2</sup> Elliot, K., E. Locatelli and C. Xu; The Business Case for Deconstruction (2020). Retrieved from: <https://www.vancouvereconomic.com/research/the-business-case-for-deconstruction/>

Likewise, the success of the CRD's SWMP requires action from member municipalities and leveraging of municipal authority.

Strategy 5 in the SWMP highlights several ways the CRD can support municipal waste reduction efforts. The City recommends that in addition to these measures, the CRD take a strong leadership role in facilitating regional collaboration on waste reduction and should establish a program to maximize use of municipal authorities to reduce waste. Such a program could include a working group or municipal liaison and support the development of regional tools and resources.

- **RECOMMENDATION:** That the CRD lead regional collaboration and leverage municipal authority.

The CRD can also demonstrate leadership by prioritizing waste stream management licensing (Strategy 6.C) and source separation requirements (Strategies 8.B and 9.F). These enabling actions will strongly support regional waste management and create opportunities to reduce waste from all sectors, in addition to organics and construction waste, as described above.

### **Concluding Remarks**

The City of Victoria supports the strategies and actions drafted in the CRD's Solid Waste Management Plan and offers specific recommendations that relate to the implementation of the proposed plan in alignment with Zero Waste Victoria.

With the recent adoption of Zero Waste Victoria and given the important role within the region Victoria has in advancing waste reduction, on behalf of Council, I would like to invite your team to a future Committee of the Whole meeting to provide a presentation and take questions on the draft Solid Waste Management Plan.

Thank you again for providing this opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jocelyn Jenkyns', written in a cursive style.

Jocelyn Jenkyns  
City Manager