

From: [Hugh Stephens](#)
To: [CRD Chair](#); [CRDBoard](#)
Cc: [Dave Cowen](#)
Subject: Delegation Presentation on Biosolids
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Attachments: [Presentation to CRD Board Dec 14 2022 FINAL.docx](#)

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Deer Chair Plant and Members of the Board,

Thank you for listening to my oral presentation on behalf of the Peninsula Biosolids Coalition at yesterday's (Dec. 14) Board meeting outlining our concerns with the current policy on disposal of biosolids at the Hartland Landfill, and the need for comprehensive water testing, including testing for "contaminants of emerging concern", not covered by the OMRR.. Chair Plant asked if I would distribute a written copy of my remarks. I am happy to do so. Please find attached.

Thank you,

Hugh Stephens

on behalf of the Peninsula Biosolids Coalition

Presentation to the CRD Board, December 14, 2022

BIOSOLIDS

Thank you. I'm Hugh Stephens from the Society for the Protection of the Mount Work Region. Today I am representing Mr. Dave Cowen, CEO of Butchart Gardens in his capacity as Chair of the Peninsula Biosolids Coalition. Mr. Cowen sends his apologies. A last minute work commitment made his personal appearance impossible.

The Coalition is made up the following:

The Butchart Gardens;
Society for the Preservation of the Mount Work Region;
Friends of Tod Creek Watershed;
Saanich Inlet Protection Society;
Peninsula Streams Society, and
Biosolids Free BC

These groups share a common concern regarding the excessive and continual land application of biosolids at Hartland Landfill. We all depend on the long term health of our land and water resources. In the case of the Butchart Gardens, these resources sustain hundreds of family sustaining jobs and the Gardens wants reassurances that its water licences are safe. Pollution risk from biosolids is measured in nanograms. There is no room for error.

While some of the contents of biosolids are regulated by the Province, many dangerous, carcinogenic compounds found in biosolids are not regulated, including "contaminants of emerging concern", such as PFAs, PCBs and other toxic "forever chemicals".

As noted in the staff report, due to problems with the Lafarge disposal option literally hundreds of tonnes of biosolids are being spread on a daily basis at Hartland, in a manner that is non-compliant with the 'beneficial use' requirements of the Ministry, and in direct contradiction of the CRDs obligations as the environmental steward of our region.

The CRD has banned land application of biosolids since 2011. Hartland is the exception, not the rule. Chair Plant has written twice to Minister George Heyman to ask for assurances that spreading biosolids at Hartland is safe. No reply has been received in over a year. It appears the Province will not give that assurance; instead it is downloading the risk on to this Board.

We are very concerned that the continued heavy application of biosolids in the limited space available at Hartland will inevitably lead to dispersal via wind or rain erosion, and the pollution of waterways and aquifers with a risk to human health and the environment.

Therefore, we call for an immediate end to the land application of biosolids at Hartland, preferring safe storage as a short-term measure to protect the regions farms, forests and waterways. Additionally, we call for an expansion of water quality testing beyond the limited peripheral testing done by CRD, testing that would also include biosolid contaminants not captured by the OMRR.

Regarding testing, the RainCoast Conservation Foundation, an NGO that did extensive water testing last year during the Sumas flooding in the Fraser Valley, has offered to work with our group and the CRD to

develop and conduct a water quality testing program to determine if the spreading of biosolids at Hartland is resulting in any of the toxic forever chemicals leaching into the waters.

In summary, we urge the CRD to respect the will of local residents and businesses and immediately end the land application of biosolids at Hartland, to move towards better options for the disposal of biosolids, and to work with the RainCoast Foundation to develop and support a 3rd party water quality testing program that would ensure that our sewage strategy doesn't threaten the local environment, the health of current residents and future generations or the viability of local business.