

**REPORT TO SAANICH PENINSULA WASTEWATER COMMISSION  
MEETING OF THURSDAY, NOVEMBER 17, 2016**

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**SUBJECT      ORGANIC MATTER RECYCLING REGULATION REVIEW –  
SAANICH PENINSULA WASTEWATER COMMISSION RESPONSE TO BC  
MINISTRY OF ENVIRONMENT**

**ISSUE**

The BC Ministry of Environment (MOE) is undertaking a review of the Organic Matter Recycling Regulation (OMRR) and is seeking stakeholder input.

**BACKGROUND**

The OMRR governs the construction and operation of composting facilities and the production, distribution, sale, storage, use, and land application of biosolids and compost in the Province of BC. The current OMRR has been in effect since 2002. The OMRR was developed to facilitate the recycling of organic material while protecting human health and the environment. The OMRR is intended to help divert materials from landfills and supports the MOE goal of reducing municipal solid waste disposal. MOE announced a comprehensive review of the OMRR in September 2016 to ensure that the regulation continues to protect human health and the environment. The MOE is receiving responses to their Policy Intentions Paper by December 2, 2016.

At its meeting of October 20, 2016, the Saanich Peninsula Wastewater Commission reviewed the MOE Policy Intentions Paper and passed the following resolution to provide direction to staff with respect to a response to MOE:

That the Saanich Peninsula Wastewater Commission:

1. Provide comments on the Organic Matter Recycling Regulation to advise that the Commission is investigating options for suitable methods of dealing with the Peninsula green waste streams, and that the Commission's main concern is the ability to conduct pilot projects to evaluate different technologies;
2. Request that the permitting process for conducting pilot projects be streamlined so there are no delays and minimal red tape involved.
3. Direct staff to draft a letter incorporating the motion and bring it back to the next Commission meeting for approval; and
4. Provide a draft of the letter to the Saanich Peninsula municipalities to give them an opportunity to write a letter of support for this submission as well.

The subject of biosolids is also being actively considered by the CRD Board. At its October 12, 2016 meeting, the CRD Board tabled a motion to reaffirm the Capital Regional District (CRD) policy banning land application of biosolids until staff could review and provide feedback with respect to any components of the OMRR review that may have implications on current CRD policies. The CRD Board will consider a staff report at its meeting on November 30, 2016, seeking direction with respect to providing a CRD Board response to the OMRR review, drawing attention

to the current land application ban policy. The report will also note that the Saanich Peninsula Wastewater Commission has expressed that the OMRR should provide for a streamlined approach to the permitting process, particularly for pilot projects, and that operational flexibility and implications should be accounted for under the CRD policy.

In addition, the CRD Board, through its Integrated Resource Management Select Committee (IRMSC), is aware through recent reports from IRMSC, that the Saanich Peninsula Wastewater Commission desires an updated review of IRM technologies and disposal options that could include land application on a sub-regional level.

A draft letter has been prepared (Attachment 1) for submission, subject to CRD Board or Commission direction.

## **ALTERNATIVES**

### **Alternative 1**

That the Saanich Peninsula Wastewater Commission recommends to the CRD Board:

1. That the following resolution from the Saanich Peninsula Wastewater Commission be submitted to the Ministry of Environment for consideration by the Ministry in preparing the proposed revisions to the Organic Matter Recycling Regulation:
  - a. Provide comments on the Organic Matter Recycling Regulation to advise that the Commission is investigating options for suitable methods of dealing with the Peninsula green waste streams, and that the Commission's main concern is the ability to conduct pilot projects to evaluate different technologies;
  - b. Request that the permitting process for conducting pilot projects be streamlined so there are no delays and minimal red tape involved; and
2. That the submission be made with a letter from the Chair of the Commission.

### **Alternative 2**

That the Saanich Peninsula Wastewater Commission recommends to the CRD Board that a submission from the Saanich Peninsula Wastewater Commission not be made to the Ministry of Environment for consideration by the Ministry in preparing the proposed revisions to the Organic Matter Recycling Regulation.

## **IMPLICATIONS**

Submitting the Saanich Peninsula Commission's resolution as a response to the Ministry is an opportunity to provide clear feedback on the need for the regulation to provide flexibility for services wanting to meet environmental and financial objectives while protecting human health and the environment. No response could indicate that the proposed revisions outlined in the intentions paper are acceptable. The CRD Board may desire a single response from the CRD that reflects the feedback from all of the affected CRD services. Direction from the CRD Board in this regard could come from the November 30, 2016 meeting.

## **CONCLUSION**

The BC MOE is considering amendments to the OMRR and seeking review comments by December 2, 2016. If the CRD Board policy banning land application of biosolids was to be reconsidered by the Board, or if the Saanich Peninsula Wastewater Commission decides to pursue a sub-regional approach to the treatment and end-product uses of green wastes, the OMRR sets out the regulatory framework that would be followed. By resolution, the Commission passed specific feedback for MOE's consideration in preparing the proposed revisions to the regulation and is seeking the CRD Board's approval of the submission.

## **RECOMMENDATION**

That the Saanich Peninsula Wastewater Commission recommends to the CRD Board:

1. That the following resolution from the Saanich Peninsula Wastewater Commission be submitted to the Ministry of Environment for consideration by the Ministry in preparing the proposed revisions to the Organic Matter Recycling Regulation:
  - a. Provide comments on the Organic Matter Recycling Regulation to advise that the Commission is investigating options for suitable methods of dealing with the Peninsula green waste streams, and that the Commission's main concern is the ability to conduct pilot projects to evaluate different technologies;
  - b. Request that the permitting process for conducting pilot projects be streamlined so there are no delays and minimal red tape involved; and
2. That the submission be made with a letter from the Chair of the Commission.

Submitted by:	Ted Robbins, BSc, CTech, General Manager, Integrated Water Services
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November 15, 2016

## Attachment 1

Ministry of Environment – OMRR Regulation Review  
PO BOX 9341, Stn Prov Govt  
Victoria, BC V8W 9M1

Dear Sir/Madam:

The Saanich Peninsula Wastewater Commission (Commission) is a service Commission of the Capital Regional District (CRD) Board. The Commission is responsible for administrative and operational oversight of the Saanich Peninsula Wastewater Service (SPWS), owned and operated by the CRD for the three participating municipalities on the Saanich Peninsula; District of Central Saanich, District of North Saanich, and the Town of Sidney.

Although the CRD SPWS previously produced Class A biosolids with its secondary wastewater treatment plant residuals for land application, the current CRD Board policy restricts the production or land application of biosolids. Working with other local government elected officials in the Region, the Commission is actively contemplating options for a 'sub-regional' solution on the Saanich Peninsula to treat and dispose of the treatment plant residuals and other green wastes. A pilot project is being considered by the Commission to test treatment technologies and end-product uses and markets.

At its meeting of October 20, 2016, the Commission reviewed the Ministry of Environment (MOE) Organic Matter Recycling Regulation (OMRR) Policy Intentions Paper and passed a resolution with respect to a response to MOE. The primary intent of the resolution is to convey the Commission's request that the OMRR sets out policy and codes of practice for both pilot scale and full scale operations in keeping with the MOE regulations, so that jurisdictions have the ability to efficiently conduct pilot projects to evaluate different technologies and feedstock integration prior to committing to a full scale operation. The resolution is as follows:

*That the Saanich Peninsula Wastewater Commission:*

*Provide comments on the Organic Matter Recycling Regulation (policy intentions paper) to advise that the Commission is investigating options for suitable methods of dealing with the Saanich Peninsula green waste streams, and that the Commission's main concern is the ability to conduct pilot projects to evaluate different technologies, and requests that the permitting process for conducting pilot projects be streamlined so there are no delays and minimal red tape involved.*

Thank you for considering the Commission's submission in preparing the proposed revisions to the regulation.

Yours truly,

Chair, Saanich Peninsula Wastewater Commission