

**DATE:** June 10, 2022

**FILE:** 5360-30

**TO:** Chair and Directors  
Comox Strathcona Waste Management Board

**FROM:** James Warren  
Deputy Chief Administrative Officer

Supported by James Warren  
Deputy Chief Administrative Officer

*J. Warren*

**RE: Solid Waste Management Plan Renewal**

### **Purpose**

To initiate the Comox Strathcona Waste Management (CSWM) Solid Waste Management Plan (SWMP) renewal and to provide the Board with information regarding major milestones in the work associated with the SWMP renewal.

### **Recommendation from the Deputy Chief Administrative Officer:**

THAT the Comox Strathcona Waste Management Board begin the process of renewing the Solid Waste Management Plan for the entire area of the Strathcona Regional District and Comox Valley Regional District (including the City of Campbell River, City of Courtenay, Town of Comox, Village of Cumberland, Village of Sayward, Village of Gold River, Village of Tahsis and Village of Zeballos), and direct staff to notify the public and Ministry of Environment and Climate Change Strategy of its intention to amend the plan and begin a process of consultation;

AND FURTHER THAT staff prepare the terms of reference for the Regional Solid Waste Advisory Committee and subsequent plan for recruitment of members to bring forward to the September 2022 Comox Strathcona Waste Management Board for approval.

### **Executive Summary**

- SWMPs are mandated by the Province through the *Environment Management Act* for regional districts to complete, and a 10 year renewal is suggested by the Ministry of Environment and Climate Change Strategy (Ministry) to ensure that the plan reflects best practice and the evolving realities of solid waste management.
- Continuing to build on the 2012 SWMP identified diversion initiatives, such as waste stream management licensing for ICI and rural residential services, will require a SWMP renewal.
- With a defined path forward for residual waste management as laid out in the [Comox Valley Waste Management Center Masterplan](#), staff resources can be focused on planning next steps of the blueprint to advance the CSWM waste diversion goals to ensure long term, reliable and cost effective in-region solid waste disposal.
- Engaging with users of the remote landfills slated to close during this next 10 year period will help determine what investments are necessary to support circular use of materials in these regions, and to lower community disposal costs and emissions associated with transferring waste.
- A SWMP renewal is a multi-year process with extensive public consultation which affords the service with the authority and direction to proceed with a path forward for the coming

decade. Beginning the SWMP renewal process at the start of a board term allows directors to see the process through to the finish.

- Input received from the current Board during the September 2021 SWMP workshops will be incorporated into the public survey question development, and provided to the advisory committee for consideration. The newly elected Board will approve participants for the advisory committee, based on the terms of reference reviewed by the current Board.

Prepared by:

Concurrence:

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### Background

SWMPs are mandated by the Province through the *Environment Management Act* for all regional districts to complete, and a 10 year renewal is suggested by the Ministry to ensure that the plan reflects best practice and the evolving realities of solid waste management. Once the SWMP is approved by the Ministry, it authorizes a regional district to manage municipal solid waste and recyclables in accordance with the approved plan, including any conditions set out in the operational certificates, permits or local bylaws. A SWMP sets the direction and course of disposal and diversion programs for solid waste operations in the region, and identifies bylaws, capital works and diversion initiatives to be undertaken in the coming 5-10 years to achieve the stated solid waste objectives, taking into consideration system financing.

The current CSWM SWMP was completed in 2012 and received Ministry approval in 2013. It identified a number of significant capital investments to be made to transition the CSWM service through the closure of the Campbell River Landfill and the Pidgeon Lake Landfill, and the development of a single, regional engineered landfill in Cumberland, the Bevan Landfill. The 2012 SWMP also identified the diversion of organics as a major goal of the plan, and a targeted minor amendment of the SWMP in 2021 gained approval for the construction of the organics transfer station and regional processing facility to support that goal. Those facilities are under construction now, in addition to the construction of Cell 2 at the Comox Valley Waste Management Center, as per the [Comox Valley Waste Management Center Masterplan](#).

The Ministry has set two long term provincial targets within the *2016 Guide to Solid Waste Management Planning* that regional districts are to work towards within their SWMPs. These goals were slightly updated and reiterated within the 2022 Ministry Service Plan:

1. Lower the municipal solid waste disposal rate to 350 kg per person per year.
2. Have 80 per cent of BC's population covered by organic waste disposal restrictions.

As suggested by the Ministry, the CSWM service undertook a five-year effectiveness review of the current plan in 2018 to analyse status of the plan's implementation. Two initiatives remain from the review and are still considered outstanding:

- Multifamily and ICI buildings are not yet required across the service area to implement a recycling collection service. A model bylaw for mandatory physical space allocation for recycling in multifamily and ICI buildings across the service area should be developed.
- The CSWM service has only just begun to specifically encourage the private and non-profit sectors to develop and mature construction and demolition waste recycling services locally.

Continuing to build on the 2012 SWMP identified diversion initiatives, such as waste stream management licensing for ICI and rural residential services, will require a plan renewal. With a defined path forward for residual waste management, staff resources can be focused on planning next steps of the blueprint to advance the CSWM waste diversion goals to ensure long term, reliable and cost effective in-region solid waste disposal. Engaging with users of the remote landfills slated to close during this next 10 year period will help determine what investments are necessary to support circular use of materials in these regions, to lower community disposal costs and emissions associated with transferring waste.

Since the *2016 Guide to Solid Waste Management Planning* document was issued by Ministry after the development of the last SWMP, changes to the suggested structure of the plan have been made to facilitate future updates and amendments. Information that is likely to change can be included in schedules to the plan, so that they can be altered without having to amend and obtain approval on the entire plan. Amendments to schedules that are part of the plan still require minister approval; however, as only the schedule(s) being amended require approval, the process would be streamlined. This would allow for targeted changes to the plan implementation schedule, borrowing amounts, or the list of active public and private disposal facilities.

On September 9, 2021, staff hosted a round table session to provide an opportunity for all current directors to identify issues and opportunities for improvements to the service to be considered in the upcoming SWMP review. The following is a summary of the feedback, paraphrased for clarity, regarding the challenges and opportunities that the directors feel the CSWM service could focus on in its upcoming SWMP renewal. The common themes in the feedback are as follows:

- advocacy for legislation to advance diversion at the provincial and federal level
- advancing the work on removing construction and demolition waste from the waste stream
- improvements to curbside collection services
- role of private depots
- education for residents and businesses to better understand how and what can be recycled, as well as the issues associated with contamination
- enforcement of material bans at the landfill to encourage diversion
- organics diversion for multifamily dwellings and small/remote communities
- the need for increased source separation, in particular for multifamily dwellings and the industrial, commercial and institutional sector
- having an ambitious but realistic diversion targets for the new SWMP
- concept of waste stream licensing to ensure private landfills are operating within regulatory compliance

The proposed SWMP review process was discussed at the October 7, 2021 CSWM Advisory, specifically surrounding the staff resources required and timing of the review, and was supported by municipal staff given its significance and impact to the management of solid waste in the region. Municipal staff provided input on the SWMP Advisory Committee structure to best streamline administrative efficiencies while ensuring a balance of public and technical input to the CSWM solid waste planning and operations.

A SWMP review is comprehensive and requires staff and contract resources, public input and support of municipal staff. Timing of the SWMP considers other engagement projects and respect the directors' term of office.

In a letter from the Ministry on January 25, 2019 to the CSWM Senior Manager, it was stated that the CVRD “is encouraged to continue working toward waste prevention and waste diversion and improve diversion rates to accomplish the targets set out in the [2012] CSWM SWMP”. This SWMP renewal will focus efforts on the top three levels of the 5 R pollution prevention hierarchy (Reduce, Reuse, Recycle, Recover, Residuals Management) shown below. The benefit of increasing diversion is twofold:

1. A reduction of airspace consumption of the existing and future landfill space.
2. The ability to pursue emerging advanced technologies for residual waste management in the future.

Out of scope for this SWMP renewal will be the pursuit of approval for additional regional residual waste disposal options beyond the expansion of the approved engineered landfill as the regional residual waste disposal option, as laid out in the Comox Valley Waste Management Center Masterplan.



The SWMP renewal is proposed to be an update to the initiatives identified within the 2012 SWMP building on:

- the successes achieved to date such as the establishment of a regional organics processing facility and the closure of the Campbell River Landfill and the Pidgeon Lake Landfill, and the development of a single, regional engineered landfill in Cumberland, the Bevan Landfill;
- the continued work of closing the remaining remote community’s landfills and transitioning to a new disposal model, source separation of recyclables for the multi-family and construction and demolition sectors;
- the new challenges that have been identified since, such as the reduction of single-use items, expansion of extended producer responsibility programs, and rural waste services.

The upcoming SWMP renewal process is a departure from the previous process where it was led by external consultants with input from staff. Leaning on existing staff experience and knowledge of the region’s communities, the CSWM service intends to lead the SWMP renewal process and to draw upon consultants and communication resources where needed, in effort to streamline the process.

The SWMP renewal will be conducted in four steps. As part of the Step 1 process, staff will need to engage the public/stakeholders, pre-election, who may be impacted by or have an interest in the renewal of the SWMP and to solicit participation in the Regional Solid Waste Advisory Committee (RSWAC). The recommended timing of this first round of public engagement is to be conducted pre-2022 election with the final scope of the SWMP consultation to be adopted by the next board. More details on the early part of the planning and key milestones are provided below:

<b>Step 1: Initiation (2022)</b>	
July 2022	Kick-off following notification of interested parties, and acknowledgment from the Ministry
September 2022	Seek approval for the Regional Solid Waste Advisory Committee (RSWAC) terms of reference from current CSWM Board. Website Update and Public Awareness Campaign, and for community members to sign-up for further information.
October 15, 2022	Local Government Elections
November 2022	Re-introduce the SWMP process to new CSWM board. Advertisement of a public survey of current use and satisfaction with the existing waste management system including call for members to join the RSWAC (timed around holiday season, which in previous years has been a good time to focus public attention on diversion and waste management).
January 2023	CSWM Board Meeting: RSWAC appointments and initiation.
<b>Step 2: Plan Direction (2023)</b>	
February and March 2023	RSWAC Meetings: Facility tour and waste management 101; set scope of SWMP Renewal and public consultation plan (as recommendations to CSWM Board); Review of draft existing system memo, brainstorm plan renewal principles, goals, and targets for the Board within the context of the Ministry's long term provincial targets, as well as consideration of the issues and opportunities identified by the previous Board.
May-July 2023	Consult with public on the proposed principles, goals, targets, as well as solicit ideas and opportunities to achieve stated objectives. Provide information on current solid waste systems and future trends as part of in person consultation.
<b>Step 3: Identification of Strategies and Options (2023 to 2024)</b>	
2023	Identify strategies to achieve the desired objectives, evaluate potential and assess the financial and resource implications.
2024	Consult with the public on a short list of strategies and options and prepare report detailing the findings. Options analysis will focus on continued efforts to improve diversion accessibility and to reduce the amount of residual waste for landfill disposal.
<b>Step 4: Plan Development and Adoption (2024 to 2025)</b>	
2024	Prepare a draft SWMP Renewal Report and Consultation Summary Report.
2024/2025	Carry out a virtual consultation of the draft SWMP, incorporate feedback from the public review.
2025	Finalize SWMP Renewal Report and Consultation Summary for submission to the CSWM Board for approval.
2025	Submit to Ministry for review and approval.

### Policy Analysis

The SWMP for the CSWM service is required under the *Environmental Management Act*. The current plan was completed in 2012 and received Ministry approval in 2013. The 2016 '*A Guide to Solid Waste Management Planning*' document from Ministry states a suggested renewal period of ten years for a SWMP. Per Ministry requirements, the CSWM service undertook a five year effectiveness review of the 2012 SWMP in 2018 to analyse the plan's implementation and effectiveness.

### Options

The CSWM Board has the following options for consideration:

1. Recommend submission to the Ministry for the initiation of the SWMP Renewal.
2. Not proceed with at this time and provide staff with further direction.

Option 1 is recommended as a SWMP renewal is required to maintain compliance with Ministry requirements. The timing of the SWMP renewal will allow for the selection of the RSWAC members by the newly elected Board, and for the content to be advanced with their support and vision, with consideration of the issues and opportunities identified by the previous Board. In order to advance many of the waste diversion initiatives, the CSWM service requires the authorities provided under a newly approved SWMP following a fulsome public and first nation consultation.

### **Financial Factors**

The 2022 budget for SWMP renewal and consultation is \$50,000, with \$140,000 earmarked for 2023. Work in 2022 will primarily focus on development of the terms of reference for the RSWAC, relationship building with First Nations communities, public recruitment for the RSWAC, and compilation of the current solid waste management system.

### **Legal Factors**

The *Environmental Management Act* requires that all regional districts have a current SWMP to the approved by Province of BC. Final plans are approved by the Minister.

### **Intergovernmental Factors**

Many of the projects and initiatives that will be detailed within the SWMP renewal will require collaboration with local governments to achieve the diversion targets expected by the Ministry. Participation by some staff from the local governments on the RSWAC will be requested to ensure their perspectives are considered in plan development. The CSWM service continues to keep local government staff informed of the activities of the service through holding of advisory committee meetings prior to each Board meeting.

Engagement with the First Nations in the CSWM service area with traditional lands within the service area are at different stages with each nation. Individualized engagement will be undertaken with each nation to learn what level of involvement they would like, as well as how best to communicate to the nation, respectful of the resources available and interest they express in engagement. A summary of Indigenous Peoples engagement will be submitted in support of the SWMP renewal.

### **Interdepartmental Involvement**

The SWMP renewal provides an opportunity for the regional solid waste service to reach out to other departments within the CVRD, as well as the SRD, and identify areas of overlap and common goals across services. Major initiatives and investments required to achieve climate change objectives would be an example of CVRD long term goals to highlight for funding through the SWMP.

The project is being led by Engineering Services and supported by the Office of the CAO, Strategic Initiatives, as well as the Communications department for project communications.

### **Citizen/Public Relations**

A process for comprehensive review and consultation with the public respecting all aspects of the development, amendment and final content of a waste management plan is required by the *Environmental Management Act*, and necessary to gain the public authority to execute our plan. Public support and engagement are critical to the success of the overall regional waste diversion strategy.

As such, CSWM will be conducting a comprehensive three-phase public engagement process. As part of the Step 2 process, staff will need to engage stakeholders, who may be impacted by or have an interest in the renewal of the SWMP. The recommended timing of this first phase of engagement is to be conducted in early 2023. The second phase will also identify and review options to address

the region's future waste management requirements and select preferred options with stakeholder input. Finally, a draft amended SWMP will be prepared, and a public review will be undertaken to gather feedback. An engagement summary report will be prepared prior to the submission of the final SWMP.

In addition to our broad community engagement, we will be completing parallel engagement with Indigenous peoples with traditional lands within our solid waste region. To align our consultation with the *Declaration on the Rights of Indigenous Peoples Act Action Plan 2022-2027* we will work towards tangible improvements to Indigenous Peoples' social, physical, cultural and economic well-being as it relates to solid waste management and the environment.