



Reference: 395121

February 7, 2023

Colin Plant
Chair
Capital Regional District Board
770 Vernon Avenue
Victoria BC V8X 2W7

C/O Dawn Sheppard
Sent via email: Dsheppard@crd.bc.ca

Dear Colin Plant:

Thank you for your letter of December 16, 2022, regarding the short-term use of biosolids in the Capital Regional District (CRD).

The Residuals Treatment Facility at Hartland Landfill converts residual solids from the wastewater treatment plant into Class A biosolids, the highest quality by-product suitable for beneficial use. Planning and regulating a range of viable options for beneficial re-use of Class A biosolids is a priority we all share.

The CRD is required to approach biosolids as a product and not a waste in accordance with the Canadian Council of Ministers of the Environment Canada-wide approach for the management of wastewater biosolids, the 5R pollution prevention hierarchy, and to promote a circular economy. Biosolids are a valuable resource containing energy, nutrients, and can help with climate change mitigation and adaptation if applied properly to soils by preserving carbon and enhancing plant growth. For example, the CRD's current practises include energy recovery and use of biosolids to create soil and capture fugitive methane gas at the landfill.

The existing CRD Beneficial Use Plan was developed by the CRD and endorsed by the CRD Board. This plan was limited by CRD policy banning biosolids land application. That policy was not informed by what has been accomplished now that treatment has been implemented, nor is it consistent with the CRD's stated goal of achieving carbon neutrality by 2030.

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The ministry is pursuing modernization of the Organic Matter Recycling Regulation (OMRR) to improve protection of human health and environment. A key objective for modernization is to better align with best practices and advances in science, including with regards to contaminants of emerging concern. As part of implementing the new OMRR, the ministry also intends to develop guidance and public facing information to improve transparency with regards to land application of biosolids. In addition, the ministry has established a technical working group on contaminants of emerging concern, which includes experts from academia, and this group will help inform implementation of provincial policy for biosolids.

Additional details regarding policy intentions and targeted timelines for implementing the new OMRR can be found in the 2022 Project Update and the 2018 Intentions Paper.

The 2022 Project Update can be accessed via:

<https://www2.gov.bc.ca/assets/gov/environment/waste-management/organic-waste/reports-and-papers/omrr-public-update-june-2022.pdf>.

The 2018 Intentions Paper can be accessed via:

https://www2.gov.bc.ca/assets/gov/environment/waste-management/organic-waste/reports-and-papers/2018_omrr_intentions_paper.pdf

Ministry staff met with CRD staff on February 1, 2023, to discuss beneficial use options and continue to be available to work with the CRD to review those or other alternative beneficial use options currently being considered. Landfilling of biosolids is not consistent with the CRD's solid and liquid waste management plans as approved pursuant to the Environmental Management Act.

If the Board wishes to amend their plan, they are welcome to submit a new contingency plan for approval at any time that is consistent with existing direction and with your current approved solid and liquid waste management plans.

Thank you again for taking the time to write.

Sincerely,



George Heyman
Minister