



Reference: 410518

June 6, 2024

Colin Plant, Chair
and Directors
Capital Regional District
PO Box 1000
Victoria BC V8W 2S6

Sent via email: crdchair@crd.bc.ca

Dear Chair Plant and Directors:

Thank you for your update on the Capital Regional District's (CRD) Long-term Biosolids Management Strategy at our meeting on May 6, 2024. You asked at that meeting if I would consider allowing a six-month extension to the June 2024 deadline for submission of the long-term strategy.

In the 2016 Core Area Liquid Waste Management Plan, the CRD committed to developing a long-term management strategy for the beneficial use of biosolids. Since commissioning the Residuals Treatment Facility at Hartland Landfill in 2020, the CRD has been managing biosolids under a Short-Term Biosolids Contingency Plan. The approval of the Short-Term Biosolids Contingency Plan on September 25, 2020, required the CRD to submit for approval a Long-term Biosolids Strategy by June 18, 2024, to support adoption by January 1, 2025.

These deadlines were set to provide the CRD with ample time to develop a sustainable and responsible long-term strategy for the management of biosolids. Incineration, the preferred option in the Short-Term Biosolids Contingency Plan has been unreliable, resulting in the landfilling of biosolids in contravention of the LWMP. The negative effects of the current situation have included loss of valuable landfill space, non-compliance with regulatory requirements, and negating the benefits from waste stream organics diversion.

Despite these concerns, your request for a delay in the submission of the long-term strategy is approved subject to the following requirements:

1. Submit a final Long-Term Biosolids Management Strategy by December 1, 2024. The long-term strategy must include a plan and schedule for adoption and initial implementation by April 30, 2024. ...2

2. Submit a revised draft to ENV by July 31, 2024, for review before finalizing the long-term strategy. I expect the strategy to propose an adaptive management framework to ensure periodic consideration of evolving science, updates to regulations, and findings from monitoring undertaken by the CRD.
3. Initiate a third-party academic review of the scientific literature on the uses and impacts of biosolids with an emphasis on field-based studies. The CRD shall engage with the ministry in undertaking a review.
4. Undertake a public information program focused on describing:
 - The CRD's source control program to limit contaminants of concern in biosolids, and;
 - The nature of CRD class A biosolids and how class A biosolids can be managed safely and in a manner that avoids risk to agricultural lands and drinking water sources.
5. Initiate an ongoing sampling program to assess biosolids for contaminants of emerging concern and making this information available to the public.
 - Work with ENV to determine sampling frequency and methods for specific contaminants of concern and to determine benchmark information for the purpose of analysis and publication.
6. Undertake and report on a preliminary cost assessment (order of magnitude) for full-scale thermal treatment and management or resulting residuals. Include a forecast of impacts to CRD ratepayers if thermal treatment is included in the long-term strategy.

This delay is provided so that the CRD has additional time to finalize a Long-Term Biosolids Management Strategy, consult with the public and First Nations, and undertake a thoughtful decision-making process.

Finalizing a long-term strategy is necessary to ensure continued progress toward implementing sustainable and responsible solutions for managing biosolids. Finalizing a long-term strategy will demonstrate the CRD's commitment to ensuring compliance with regulatory requirements. It will also allow further assessments and decisions to proceed as necessary to implement a long-term strategy.

Sincerely,



George Heyman
Minister