

Thank you for this opportunity:

As an elected official, and past chairman of the Thompson Nicola Regional District, I have spent the past four years working to enlighten not only local but provincial government representatives regarding the dangers of the toxic biosolid regulations.

I have sat with Premier Horgan, Minister Heyman and made my case. I have done the same with the previous Governments Minister Polak and Premier Clark. The regulatory legislation in place within the Ministry of Agriculture, Ministry of Environment and Climate Change Strategy and to some extent the Ministry of Forests Lands and Natural Resource Operations has proved to support the lowest cost highest harm option for the treatment of bio solids in this province through the support of the land application of this toxic soup euphemistically labeled beneficial biosolids or a soil enhancement.

I have run head long into the wall of Professional Reliance industrial protectionism, this model is broken to the point that the inertia or momentum created within the waste industry has wedged it's self firmly between the constituents and governments of this province in order to support the industries they work for and line the pockets of the unsuspecting or fully aware land owners in order to rid cities of this toxic burden.

Below is a copy of the letter of response, dated Dec 15, 2017, sent to one of my constituents by the Ministry of Environment as a result of voicing not only his concerns but the shared concerns of many more in relation to the impact of the existing professional reliance model. Mr. Vincent's rebuttal of this response sums up where we are at in this province when it comes to what the existing professional reliance model has done to twist the system. Environmental protection is not the protection of business interests nor is it the protection of Civic governments from handling their waste in a responsible manner. The professionals protecting the environment need to be working in government not industry. History has shown that money talks and the truth is often obfuscated for profit or political gain.

We can do so much better and must. If I can help in any way to sharing my experience and understanding of what is at issue here please do not hesitate to contact me.

Thanks again,

Randy Murray

250-936-9038

director.rmurray@tnrd.ca

Below is the response I got back from our government - (and my response in brackets following each section)

The Gov't response to my letter to George Heyman about ending the land disposal of Sewer Sludge

December 15, 2017

Dear Mr. Vincent:

Thank you for your email of November 20, 2017, addressed to the Honourable George Heyman, Minister of Environment and Climate Change Strategy, regarding the land disposal of sewer sludge. Minister Heyman has asked that I respond on his behalf.

I appreciate your interest and concerns regarding the management options for bio solids. It is clear that you have spent significant time researching this topic and have strong opinions regarding bio solids management.

For clarity, the application of raw sewage sludge to land is not an authorized activity in British Columbia. The Organic Matter Recycling Regulation (OMRR) does not allow the direct application of sewage sludge to soil. First, sewage sludge must be stabilized to reduce pathogen content and be converted to bio solids (Class A or Class B). Then, Class A and B bio solids may be land applied under stringent requirements and conditions, or further processed into Class A compost, Class B compost or bio solids growing medium. All of these products must meet specific quality standards.

Response by Mr. Vincent in brackets after each section below:

("For clarity", if that is what you really want - "bio solids" is merely sewer sludge that has been tarted up with a PR term to make it sound agreeable - lipstick on a pig if you will ... "stabilization" and "pathogen testing" does not address the Thousands of Toxins found in all sewer sludge aka "bio solids." Note that only 10 metals and pathogens are tested for to qualify as "Class A" (along with odour and vector reduction). There are thousands of toxins in "bio solids" – and here are just a few of them (none tested for) that may be found in your so-called "Class A" compost - dioxins ,acetone, anthracene, barium, beryllium, carbon disulfide, 4-chloroaniline, diazinon, fluoranthene, manganese, methyl ethyl ketone, nitrate, nitrite, phenol, pyrene and silver. Worrying too is that prions, microplastics, fire retardants, hormones and synthetic hormones, pesticides, pharmaceuticals, and plasticizers may all be found in bio solids of ALL classes. Safety testing, by bio solids scientists, looks merely at single chemical toxicity amounts. This is faulty, simplistic, and outdated. As the scientists taking part in the Halifax Project have shown, it is the exposure to a variety of toxins in low-dose that can cause cancer. (The Halifax Project took place between 2012 and 2015 and it involved more than 350 cancer researchers and physicians from 31 countries ... focused on the carcinogenic potential of low dose exposures to mixtures of chemicals in the environment) See this link for more on their findings - <http://www.gettingtoknowcancer.org/index.php> The so-called "processing" you talk about - digesting, composting ... does nothing to address the vast majority of serious contaminants found in this residual waste).

The OMRR establishes scientific standards and requirements to ensure that activities carried out in accordance with the regulation are protective of human health and the environment. When updating the regulation the Ministry is committed to incorporating science and evidence-based requirements, best achievable technologies and improved management practices to further protect human health and environment.

(Rarely has there been a less regulated toxic substance. Every aspect of the process, from site selection to application procedures, to the toxic composition of the sludge itself — all of it is woefully under-supervised. In fact, to a great extent it relies on self-regulation. OMRR guidelines are simply inadequate to deal with emerging environmental issues or ensure public safety. If the product has as you say, “stringent requirements” and “quality standards”, then why out of the thousands of toxins and chemicals in bio solids are only about a dozen tested for? How did the Suzuki Foundation recently find very toxic components in the “bisosolids” delivered to the Nicola Valley from the Lower Mainland? As the scientist in charge of the testing, John Werring said, “I personally believe, as a scientist, that this material, that is being pawned off on the general public as being safe and useful as a beneficial fertilizer, is actually toxic and contaminated and it should not be put on any kind of food producing land whatsoever,” (For an interview with CBC see this link - <http://www.cbc.ca/news/canada/british-columbia/scientist-finds-unacceptable-chemical-levels-in-merritt-biosolids-1.3180079> ) It should be remembered too that the gov’t response at the time was not to address the issue that this residual waste contained such levels of toxins in a way that protected public health - it merely INCREASED the allowable limits to certain contaminants!! )

As you may be aware, the Ministry of Environment and Climate Change Strategy is currently conducting a review of the Organic Matter Recycling Regulation. As part of this review, the ministry is evaluating input received during its 2016 Intentions Paper consultation process. As well, based on the feedback on the 2016 Intention Paper and a desire to explore new policy proposals, the ministry is planning to post for public consultation a follow up Intentions Paper in the spring of 2018. This will provide an additional opportunity for obtaining a broad range of input on the regulation and bio solids management options.

The review will assess information on new technology, emerging substances of concerns and new practices to determine the best path forward. The information gathered is considered when making changes to the regulation and when developing or amending supporting guidance documentation. Ministry staff will confirm that your name is included on the OMRR mailing list to ensure you receive any updates on the review.

(It is time for this government to act with courage and vision ...To call a spade a spade - this is NOT a “beneficial” substance, it is not recycling to dispose of it on soils meant to sustain us, it is not green, and

it is not sustainable. We must stop calling this toxic goulash a “soil amendment.” As Dr. Caroline Snyder has noted - "Land-applied municipal sewage sludge (bio solids) is a highly complex and unpredictable mixture of biological and chemical pollutants. Biosolids generated in our large industrialized urban centers is very likely the most pollutant- rich waste mixture of the 21st century.") The Water Utilities do a great job of separating the dangerous chemicals out of the water, so that water can be returned to Mother Earth. Why would we ever think it a good idea to turn around and put those collected and concentrated toxins back into the environment we just took them out of? It is reckless and short-sighted.)

For more information about the OMRR review or about management options for bio solids, please contact Mr. Chris Jenkins, Director of Clean Technologies with the Ministry of Environment and Climate Change Strategy, at 778 698-4891 or by email at Chris.Jenkins@gov.bc.ca.

Thank you again for taking writing to share information about bio solids management and your concerns.

Sincerely,

David Morel, Assistant Deputy Minister, Environmental Protection Division

(I find it ironic indeed that you are working within the “Environmental Protection Division” when in fact the process you are attempting to justify is jeopardizing that very environment you purport to protect! As Dr. Rayne has noted – “An unimaginably large number of chemical and biological contaminants exist in these materials, and they persist in the product up to, and after, land disposal. Scientific investigations have identified only a tiny fraction of the total contaminant load ... You are not going to find a problem if you don't look for it. Of course, over time, that problem may also come looking for you ... Governments are playing Russian roulette with sewage sludge. Over time, there is a high probability this game will be lost at the public's expense.” (see <http://bit.ly/1sb2qOP> )

(Please pass my response on to Honourable George Heyman, Minister of Environment and Climate Change Strategy.

Sincerely, Don Vincent. FONV. )

Below are my (Randy Murray's) comments posted to the online provincial professional reliance review: f

**What changes, if any, are needed to maintain or improve public trust in the professional reliance model?**

The use of Professional Agrologists in the approval of environmental regulation interpretation, implementation and enforcement needs to be a level of expertise within government.

The Agricultural, Environmental and Safety legislation that supports the highest harm lowest cost land application of biosolids needs to change if Professional Agrologists are allowed to work outside of government in a trusted capacity.

We need to observe the United Nations Precautionary Principle that Canada is a signatory to.

**Do you have any other observations or recommendations you would like to make about this review, including further commentary on previously answered questions?**

I strongly recommend that multiple ministries be involved in this as overlapping jurisdictions complicate the use of professionals in operational silos that have multi discipline impacts.

When it comes to a real balanced review, please include local governments. Regional Districts are most impacted by the professional reliance model as it exists due to the board land base and demographic nature of our representation.

**Which of the following best describes your interest in this review? (select all that apply)**

I am a user of qualified professional information (includes those who hire, review, or otherwise engage with qualified professional information)

I am an elected official, area director for 10 years on the Thompson Nicola Regional District Board serving two years as CEO. I am also a qualified geothermal installer, plumber, licenced gas fitter, sheet metal and pipefitting red seal journeyman. I had a 25 year career with Fortis Utility and had business design and environmental impacts of operational activity responsibilities in addition to many others.

# Biosolids –Sewage Sludge

What I'm not going to talk about.

- Disposal alternatives (Pyrolysis)
- Land Fertilization Alternatives (working with nature)
- Recovering Phosphorus (what treatment plants can do)
- What progressive countries are doing (Options)
- Why we need to change (What is a sustainable practice)

# Biosolids – Sewage Sludge

The impacts on Rural BC in light of the current biosolids process.

The regulatory challenges.

The lowest cost – highest harm option:  
What that means to you.

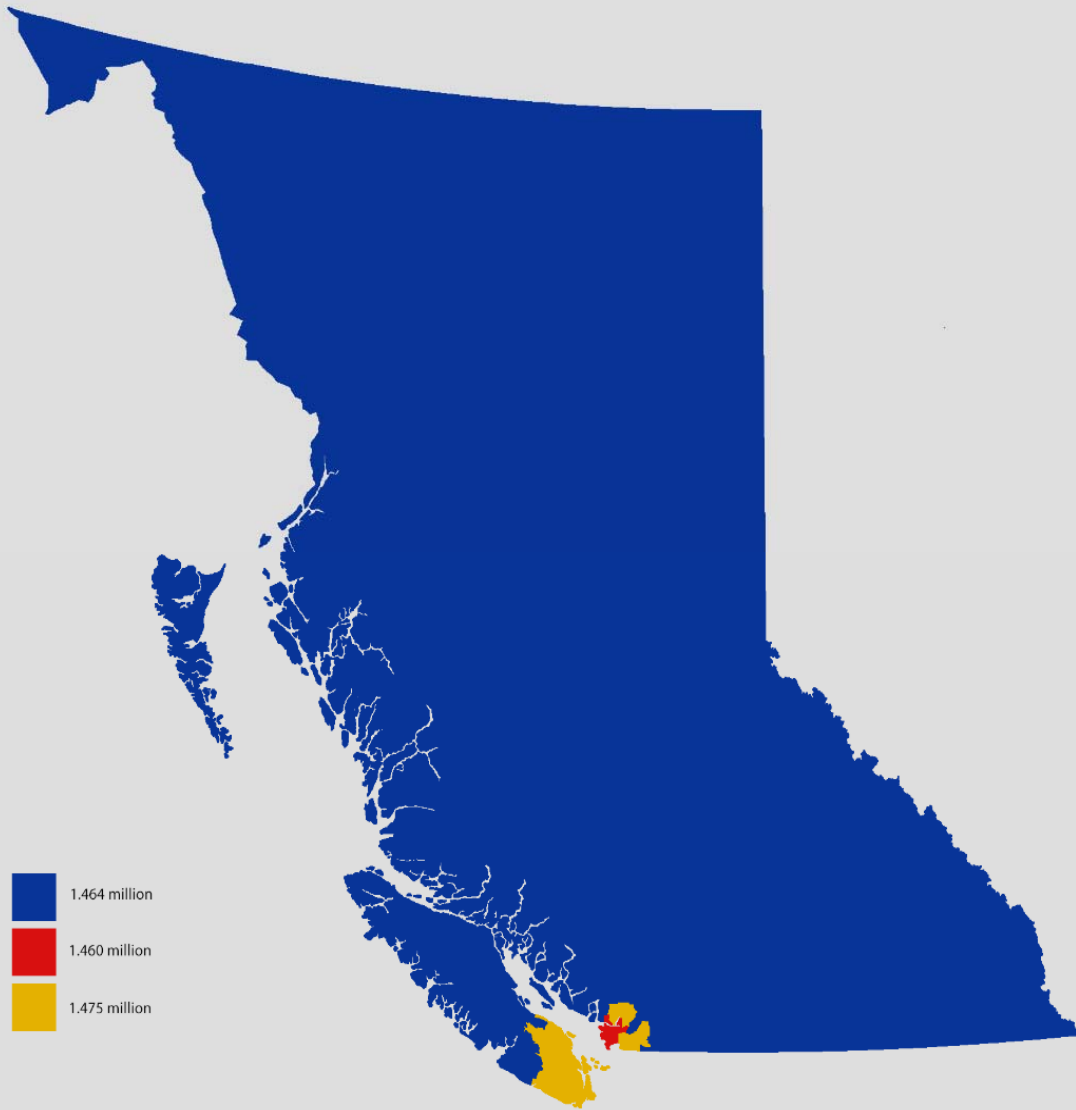
# Rural BC impacts

Lowest cost:



The cheapest way to dispose of sewage sludge is to pay a contractor to have it removed from Municipal Treatment facilities and spread on someone else's land, somewhere else.





# Sewer Sludge – What's the harm ?

- Economic
- Environmental
- Health
- Quality of Life (not so obvious)
  
- Increased truck traffic
- Transportation mishaps
- Lowered Property values
- Altered Environment
- Investment losses



# Sewer Sludge – Who says you can?

- Ministry of Agriculture
- Agriculture Land Reserve Regulations define the Activity
- ALR Regulations:
  - 2 (2) (l) reg dist bylaw can not prohibit the application of biosolids on ALR land,
  - 3 (1) (p) allows the production, storage and application of Class A compost in compliance with the Organic Matter Recycling Regulation, if at least 50% of the compost measured by volume is used on the farm.

# Sewage Sludge – How it's done?

- Ministry of Environment
- Provincial Government Efficiency = Self Regulated Activity
- Organic Matter Recycling Regulations facilitate the Activity
  - OMRR: Discharger to give notice of Land Application/Composting

## TNRD – Who has control?

- What is within the Regional District control?
  - Limited Bylaw creation
  - Lobby the Provincial Government for change
- Biosolid company
  - Full control of contracts, composting and land application activity. Where, when, who .... a registered professional
- Provincial Government
  - Full regulatory control over Biosolids

## What's was needed.

- A new Regional District Bylaw, exercise control over what can be controlled.
- Take a Resolution to the Union of BC Municipalities Convention urging the Provincial Government to revise the OMRR and ALC Regulations and the BC biosolids Process. (September 2015)

# Resolution –UBCM

## • **BIOSOLID WASTE IMPORTATION AND COMPOSTING**

- WHEREAS the Ministry of Environment and the Ministry of Health are responsible for reviewing and approving biosolid composting facility permits and land application notifications under the Organic Matter Recycling Regulation and the Ministry of Agriculture is responsible for administration of the Agricultural Land Commission Act;
- AND WHEREAS, due to these activities being carried out within the Agricultural Land Reserve, the interjurisdictional importation of biosolid waste materials is being authorized and land application and composting facilities are being permitted without a public consultation process in locations where residents and the environment may be adversely affected by potential health risks, noise and odour nuisances, property value reductions and loss of community well-being:
- THEREFORE BE IT RESOLVED that the Province form a committee including local government representatives to examine and make recommendations for changes to the Provincial biosolid review process and changes to the content in the Organic Matter Recycling Regulation and Agricultural Land Commission Act that govern the biosolid regulatory process in the Province of British Columbia.

# So what happened?

- The Thompson Nicola Regional District passed a bylaw 2516 controlling what we could control. (Nov 2015)



# And then what happened?

- BC Government responded to UBCM Resolution B-59: (Spring 2016)
  - Announced a review of OMRR to be complete 2017
  - Announced a policy intentions paper for the fall of 2106
  - Held a scientific “ review” process 2016

# OMRR Review – what changed?

# The Precautionary Principle guidelines. United Nations

- Whether one considers that the health and integrity of ecosystems and the preservation of species is important for the well-being of humanity or because they have value in their own right, any potential harm from human activities that might jeopardize these is morally unacceptable.

The Precautionary Principle guidelines.  
An activity is morally unacceptable if it is:

- threatening to human life or health, or
- serious and effectively irreversible, or
- inequitable to present or future generations, or
- imposed without adequate consideration of the human rights of those affected.

## Please Consider This:

- The impacts of this activity on rural BC and the planet should not be underestimated.
- It's not just about the Science.
- There is enough unbiased information circulating to raise grave concerns.
- Cease the Land Application of Biosolids, error on the side of caution.

We have been down this road before....

*Thank You.*