

**Submission to Metro Vancouver's
Consultation on the
Draft Integrated Solid Waste and
Resource Management Plan
"How Should We Manage our Waste?"**



From
The Canadian Union of Public Employees
British Columbia Division

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Introduction

The B.C. Division of the Canadian Union of Public Employees (CUPE B.C.) represents more than 80,000 workers throughout British Columbia. On behalf of those members, we appreciate this opportunity to provide comments on Metro Vancouver's Draft Integrated Solid Waste and Resource Management Plan.

CUPE has a longstanding interest in solid waste reduction and management issues. Our union represents most solid waste and recycling workers for municipalities across this region – and across Canada – so we have considerable experience and an active interest in waste management. Our union has been a strong advocate for waste reduction and recycling initiatives for decades. Our members who provide solid waste services across Metro Vancouver have a first hand understanding of the important difference that the advent of curbside recycling, yard waste collection, compost collection and similar programs have made in enabling the region to reach a 55% waste diversion rate. In the 1980s, the G.V.R.D. set a waste reduction goal of 50% which it met and then exceeded by the late 1990s. If this region aims to go beyond the proposed 70% target and takes meaningful steps towards true “zero waste” it can meet those targets as well.

Summary Position

Our general positions are:

- CUPE supports an aggressive “zero waste” strategy for the Lower Mainland. We believe much more can be done than is currently planned to meaningfully reduce commercial and industrial waste; construction, demolition and renovation waste; compostable organic waste and waste from multi-family dwellings.
- CUPE believes that waste reduction and recycling are important components of a “green jobs” strategy.
- CUPE is opposed to the expansion of multi-decade “public-private partnerships” (P3s) to deal with Metro Vancouver waste issues. Waste is an important public resource and responsibility which should not be turned over to private control for private profit, but rather should be managed publicly in the public interest.
- CUPE is concerned about the proposal to build one or more large privately operated P3 incinerators and to rely on incineration for disposal of most residual waste. A major increase in expensive P3 incineration in this region will act as a disincentive to zero waste goals and puts the region at risk for other undesirable health and environmental consequences.
- CUPE is concerned by proposals to deal with Metro Vancouver's waste by shipping it elsewhere, particularly the idea of barging the region's garbage to the west coast of Vancouver Island in order to burn it at a P3 incinerator there. As much as possible,

Lower Mainland solid waste problems should be tackled within the region and the consequences should be handled here since it is Lower Mainland residents, businesses and communities which are responsible for generating the waste.

- CUPE believes Metro Vancouver is underestimating the potential of regulations to help guide a big increase in waste reduction, recycling and diversion.
- CUPE urges Metro Vancouver to create a central waste reduction utility to aggregate demand and assist with marketing of recyclables.
- The four amendments proposed by the City of Vancouver have considerable merit.

More Ambitious Targets for Waste Reduction

For the last several years, Metro Vancouver's waste reduction efforts have focused primarily on single family residents. The "blue box" curbside recycling initiative has done a great deal to take the region to its current 55% diversion rate.

But there is much more potential in other sectors which see only very limited diversion and waste reduction now.

For example, fully one-third of the region's waste stream is made up of construction, demolition and renovation waste. Wood waste alone accounts for 22% of the waste stream. While the draft Plan does identify measures to deal with construction waste including a ban on wood waste (but at landfills only), the attention and focus on this very significant portion of the waste stream seems vague and is frankly insufficient. If even half the effort and attention the region has put on promotion of incineration P3s in the plan had been placed on how to regulate, re-use and limit waste from the construction and demolition sector it would have taken the region a long distance towards a more ambitious diversion target.

The same can be said for the commercial/industrial and multi-family sectors. There are numerous, essentially unregulated, private dumpsters all over the region which accept all forms of waste, but rarely do the commercial establishments which hire dumpsters also provide options for source separation or waste reduction. In 2005, in Metro Vancouver, the diversion rate was only 22% in multi-family buildings compared to 44% for single family residences.¹

Contrast this with the Capital Regional District of greater Victoria, where 80% of multi-family buildings participate in a C.R.D. program to encourage waste reduction with funding allocated from a special tipping fee to help pay for apartment recycling.² While there are important multi-family initiatives in this region, such as the City of Vancouver apartment recycling program,

¹ Approaches to Multi-Family Diversion powerpoint presentation by Maura Walker and Associates and HB Lanarc Planning, Design and Sustainability for Recycling Council of B.C., May 26, 2010

² *ibid*

there is a long way to go to bring multi-family diversion levels to even the current single family levels.

And as for compostable organics, how is it that Port Coquitlam and Port Moody are the only municipalities in this region which have fully implemented regular municipal collection programs for kitchen waste over the last few years? While it is very encouraging that other communities like Vancouver, Burnaby and Richmond have recently launched kitchen waste collection, the pace in this region has been slow. The City of Toronto, for example, has been collecting kitchen waste in its Green Bins since 2005.

Metro Vancouver needs to aim for a more ambitious target than 70% diversion by 2015. By more aggressively targeting measures to reduce garbage from commercial dumpsters, the I.C.I. sector, multi-family dwellings, construction and demolition waste, and compostable organics it should be possible to achieve better than that. Dr. Jeffrey Morris has suggested credible measures which could take the diversion goal to 80%.³ Certainly, aggressive waste reduction measures in all those areas need to be implemented first before the region considers new P3 incinerators.

Green Jobs

Environmentalists, unionists and economists are increasingly planning for a greener economic future. The vision of a “green jobs” future is one which our union supports strongly.

According to a study by the Centre for Sustainability and Social Innovation of the Sauder School of Business at U.B.C. which examined the criteria of local job creation, environmental impact, barriers to development and local sustainable development: *“The results indicate that waste/materials management and energy retrofits for buildings will be the strongest initiatives to address job creation and environmental degradation, while providing local economic development to the Vancouver region...waste diversion through deconstruction projects provides jobs, promotes re-use of materials and prevents usable materials from entering the landfill...”*⁴

In December 2009, Gavin Newson, Mayor of San Francisco and Robert Morales, director of the solid waste and recycling division of the International Brotherhood of Teamsters wrote an op. ed. for the Sacramento Bee in which they noted: *“Equally important for the future of our green*

³ Environmental Life Cycle Assessment of Waste Management Strategies with a Zero Waste Objective: Study of the Solid Waste Management System in Metro Vancouver by Dr. Jeffrey Morris, Principal Investigator, Sound Resource Management Group Inc. Prepared for Belcorp Environmental Services Inc. June 2009

⁴ Green Jobs in the Inner City: Research Report 2009 Prepared by: Building Opportunities for Business (BOB) and Centre for Sustainability and Social Innovation (CSSI) – Sauder School of Business, University of British Columbia.
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economy is that recycling and composting mean jobs. The Institute for Local Self Reliance reports that every additional 10,000 tons recycled translates into 10 new frontline jobs and 25 new jobs in recycling-based manufacturing. Landfilling or incinerating those tons creates only one job.”⁵

They also observe that: “For each ton of paper, bottles and cans we don’t recycle, we end up generating an additional 71 tons of waste to create a new ton of paper, bottles or cans. This is because 71 tons of ‘upstream’ waste – raw material extraction, product manufacturing and distribution – is created...when we burn a ton of recyclables, we capture only a small amount of energy compared to all the upstream energy used to make those products....because thermal technology destroys the resources that go into it, you cannot call the energy that it produces ‘renewable’ or ‘green’...”⁶

An exciting “Recycling Works!” campaign has been initiated in the United States by the International Brotherhood of Teamsters, along with the Global Alliance for Incinerator Alternatives (GAIA). They have posted a statement which has been signed by 120 different U.S. organizations from a variety of sectors. In part that statement says: *“Recycling industries include activities such as curbside collection of materials, deconstruction of buildings and products, processing of recycled materials, composting, repair and reuse businesses and manufacturing of new products using recycled content. These industries already provide more than 1.1 million jobs in the U.S., which is comparable in size to the U.S. auto manufacturing and machinery manufacturing industries. Recycling industries generate an annual payroll of nearly \$37 billion and gross over \$236 billion in annual revenue. In addition, recycling industries provide far more jobs than waste incinerators and landfills. The job skills necessary for this industry range from entry level to high skilled labor. These industries can put America to work immediately and provide pathways to prosperity through career ladder opportunities.”⁷* (emphasis added)

Much more aggressive waste reduction and recycling should be a key part of a “green jobs” strategy for Metro Vancouver.

Privatisation

CUPE is very concerned by the proposals at the heart of the draft plan to rely on private operation of new incinerators.

⁵ “Don’t talk trash – compost, recycle, create jobs instead” by Gavin Newsom and Robert Morales. Sacramento Bee, December 20, 2009

⁶ *ibid*

⁷ <http://www.recyclingworkscampaign.org>

Waste is an important public resource and responsibility which should not be turned over to private control for private profit, but rather should be managed publicly in the public interest.

The only option that Metro Vancouver has put on the table for incineration is a minimum 20 year contract for private operation of the new “waste to energy” facilities. It is proposed that the public sector finance and bear the risk of capital construction, while then turning operations over to a private company – most likely Covanta.

The financial work that KPMG has done for Belcorp on this issue raises some important questions.⁸ While one must view with healthy skepticism a report by consultants for the owners of the Cache Creek landfill, the KPMG information is nonetheless of interest. It is true that the AECOM estimate of operating costs for private incineration of \$40 per tonne seem extremely low, particularly given the costs elsewhere. The KPMG estimate of a net cost of \$59.71 per tonne (which is net of revenue from electricity sales) should give Metro Vancouver serious cause for concern. Metro Vancouver’s core assumption that sales of electricity will lead to a small profit from the incinerators is very risky and needs more substantiation than somewhat speculative work from consultants. Similarly, KPMG raises some reasonable concerns about whether the capital costs of incineration facilities can really be kept to \$470 million. The region requires much more due diligence before making such a fundamental decision. At a minimum, it should seek an independent due diligence review of the KPMG estimates.

CUPE is also concerned that the “waste to energy” proposal is really a proposal to create a large private electricity project. We do not support provision of electricity by private companies and have joined with many other British Columbians from all walks of life in urging the provincial government to permit B.C. Hydro to develop alternative electricity projects itself directly. Given the considerable carbon dioxide emissions released by incinerators, it is questionable to consider this a form of “green” energy in any event.

Beyond the preliminary estimates from AECOM, it does not appear that Metro Vancouver has done a value-for-money report or conducted a public sector comparator exercise to try to determine objectively whether it makes sense to enter into a minimum 20 year contract with a private operator. We strongly question the assumption that new waste disposal facilities must necessarily be operated privately.

The assumption of private operation can significantly skew public policy decision-making. One consequence of private operation of potentially very profitable public facilities is that it opens up public bodies to very intense lobbying by private interests. The incredible lobbying of Metro

⁸ Letter Report to Belcorp Environmental Services Inc. from Paul Levelton on behalf of KPMG LLP, May 13, 2010. http://www.belcorp.ca/KPMG_letter_report_MSW_IssuesandAnalysis_MAY13_2010.pdf

Vancouver, its Directors and its member municipalities by both Belcorp and Covanta is a prime example. Instead of being able to weigh in the most neutral way possible the best choice for ratepayers and the environment, in this case, Metro Vancouver and its member municipalities have had to sort through the competing interests and the very well connected lobbyists for two large and profitable corporations. It is interesting to contrast this with the way that the Burns Bog landfill can be more objectively analysed within the whole mix. Because Burns Bog landfill is publicly owned and operated and – crucially – because the revenues from Burns Bog landfill go directly to public coffers, Metro Vancouver does not have to consider the views of lobbyists for that facility. It can simply look at factors like the projected useful life of the landfill, the revenues from the landfill and the environmental impact of the landfill based on fully objective information.

Not only waste disposal facilities, but – importantly – waste reduction and recycling facilities best serve the public interest if they are publicly financed, owned, operated and maintained. Each time that Metro Vancouver considers contracting out a waste reduction or waste disposal facility, it should first objectively assess the option of public operations.

Incineration Concerns

One of the main concerns with increased use of incineration is that it acts as a disincentive to aggressive waste reduction. In order to generate revenue for both the private operator and Metro Vancouver, it will be necessary to provide a consistent supply of garbage “feedstock” to the facilities. If Metro Vancouver is committed to significant waste reduction as its priority, it doesn’t make sense to at the same time tie the region into an expensive capital and operating investment which requires the consistent delivery of large amounts of garbage.

Numerous community members have also raised valid health and environmental concerns about incineration which need to be considered carefully.

There are a range of medical studies that indicate an association between exposure to air emissions from incinerators and adverse health impacts. While CUPE understands the arguments of officials who claim that emissions levels will be “acceptable” or “not significant” from a health perspective, we do not find such statements reassuring. Given the extremely toxic nature of substances that incinerators emit into the atmosphere such as nitrogen oxides, sulphur oxides, particulates, PCBs, arsenic, cobalt, cadmium, lead and dioxins, we are concerned that any exposure constitutes risk. There are particular concerns about substances such as dioxins and PCBs which build up and accumulate in people over time, even though each individual exposure may be very small. The facilities will burn plastic and heavy metals amongst many other items of concern. A variety of health effects have been associated with living near, or working in, incinerators including cancer, respiratory problems, heart disease, immune system effects, increased allergies and congenital abnormalities. We acknowledge that there is

debate about health impacts and conflicting studies, but before Metro commits to major incineration expansion we urge – at a minimum – that the region commission independent epidemiological studies of the potential health impacts.

There are similar concerns about environmental impacts. The proposed mass burn facilities may produce up to one million tonnes of carbon dioxide per year. While it is, of course, true that landfills also produce significant amounts of methane and other sources of carbon dioxide, it is a false choice to argue that the only options are either increased incineration or increased landfilling. Metro Vancouver has the potential to significantly increase its diversion goal, which would reduce the need for either landfilling or incineration. Metro staff have argued that the energy produced from an incinerator is preferable to other forms of greenhouse gas producing energy, but the vast majority of electricity in B.C. comes from hydro which does not generate carbon dioxide. And – of course – by burning products and resources which can otherwise be recycled or re-used, incineration leads to the use of additional upstream energy in order to produce replacement products for the burnt ones.

There will also be a need to deal with the fly ash left over from burning of garbage.

Finally, we need to flag significant labour relations and health and safety concerns in the United States about Covanta, the company which is mostly likely to be the operator of additional incineration facilities. For the last several years, the Utility Workers Union of America has been involved in very significant disputes with Covanta. The company has been cited by the U.S. Occupational Safety and Health Administration for serious violations of safety rules at its incinerators in Rochester Massachusetts⁹ and West Wareham, Massachusetts.¹⁰ On March 26, 2010, the National Labor Relations Board of the U.S. ordered Covanta to pay \$ 1 million for withholding wage increases and bonuses in response to workers in Massachusetts exercising their legal right to join a union.¹¹ We think the health and safety and labour relations record of this incineration company are relevant factors which Metro Vancouver should consider.

Deal with Waste within the Region

⁹ <http://www.wickedlocal.com/rochester/news/business/x718276354/Covanta-cited-for-safety-violations-at-SEMASS-plant>

¹⁰ <http://www.prlog.org/10225848-covanta-energy-cited-by-osh-a-for-fire-safety-violations.html>

¹¹ [http://www.icem.org/en/78-ICEM-InBrief/3694-UWUA-Wins-US\\$1-Million-Judgment-for-Covanta-Workers-](http://www.icem.org/en/78-ICEM-InBrief/3694-UWUA-Wins-US$1-Million-Judgment-for-Covanta-Workers-)
http://www.nlr.gov/shared_files/ALJ%20Decisions/2010/JD-19-10.pdf

The communities of Metro Vancouver are more likely to deal with solid waste problems in a sustainable manner if the problems are not shipped out of the region. Metro should avoid “out of sight, out of mind” approaches.

While it is problematic that so much waste is shipped all the way to Cache Creek, that problem will be exacerbated if Metro responds favourably to the proposal to barge garbage to the west coast of Vancouver Island in order to burn it there.

The carbon footprint of transporting Lower Mainland solid waste such long distances away from the region is a concern which should be studied carefully.

As much as possible, communities and citizens of the Lower Mainland need to take direct responsibility within the region for solid waste issues. The consequences of solid waste generation should be handled here, since it is Lower Mainland residents, businesses and communities which are generating the waste. Doing so will serve as a further incentive to increase waste reduction and diversion levels.

Regulation

Metro Vancouver and its member municipalities have made insufficient use of regulatory approaches to reducing waste. There are models in other similar communities which could be adopted here. For example, in Portland Oregon all complexes are required to provide opportunities to recycle fibres and containers and recycling must be as convenient as garbage disposal. In San Francisco California (where they have a goal of 75% diversion by 2010 and zero waste by 2020...and where they have actually achieved a 72% diversion level already) multi-family and commercial building owners and managers are required to maintain appropriate colour coded containers in appropriate locations and everyone is required to source separate.

Metro Vancouver should do a comprehensive study of regulatory approaches in jurisdictions around the world and then a range of new regulatory options should be brought forward for consideration. A combination of requirements for multi-family and commercial building owners, packaging regulations, disincentives for use of plastic bags and other plastic, mandatory re-use, and manufacturer end cycle responsibility requirements could together do much to increase waste diversion levels in this region.

A Central Waste Reduction Utility

CUPE recommends that Metro Vancouver examine options for creating a central waste reduction utility to aggregate demand and assist with marketing of recyclables from across the region. Currently, the approach to management of recyclables is diffuse and insufficiently coordinated so central coordination may provide the region with economies of scale and opportunities to increase waste reduction levels.

For example, such a utility could assist in the retrieval and management of the very large amounts of wood waste which are currently being sent to landfills and incinerators. Similarly, much more needs to be done to retrieve and re-use other potential resources from commercial dumpsters and the I.C.I. sectors. The region's solid waste problems are serious, so serious consideration needs to be given to central coordination and central marketing.

Conclusion and Summary

The four amendments to the proposed plan that have been proposed by the City of Vancouver have considerable merit. Increasing the per capita waste reduction target to match the 2006 municipal Canadian average should be very doable, given that the target is based on real world achievements elsewhere in Canada. Similarly, there is no reason why landfills and incinerators should continue to accept compostable organics and commercial wood waste which can be dealt with so readily otherwise. As for removal of expanded incineration as an option for waste-to-energy, our concerns about incineration have already been outlined.

CUPE believes that with sufficient political will and greater attention to achievable waste reduction alternatives, it is very possible for Metro Vancouver to achieve more ambitious waste diversion levels. We urge the Regional District to exercise that political will and to opt for those alternatives.

Thank you for considering this submission.

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