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SERVICES AND SOLUTIONS FOR A LIVABLE REGION

METRO VANCOUVER REGIONAL DISTRICT
AIR QUALITY COMMITTEE

MEETING

Friday, April 10, 2026
9:00 am
28th Floor Committee Room, 4515 Central Boulevard, Burnaby, British Columbia

AGENDA

A. ADOPTION OF THE AGENDA

1. April 10, 2026 Meeting Agenda
THAT the Air Quality Committee adopt the agenda for its meeting scheduled for April 10, 2026 as circulated.

B. ADOPTION OF THE MINUTES

1. January 16, 2026 Meeting Minutes *pg. 5*
THAT the Air Quality Committee adopt the minutes of its meeting held January 16, 2026 as circulated.

C. DELEGATIONS

D. INVITED PRESENTATIONS

E. REPORTS FROM COMMITTEE OR CHIEF ADMINISTRATIVE OFFICER

1. MVRD Air Quality Management Fees Regulation Bylaw No. 1440, 2026 *pg. 9*

Report dated April 1, 2026 from Gaurav Singh, Air Quality Planner, Air Quality and Climate Action Services, and Esther Bérubé, Division Manager, Air Quality Bylaw and Regulation Development, Air Quality and Climate Action Services.

Executive Summary

At its January 16, 2026 meeting, the Air Quality Committee considered proposed amendments to *MVRD Air Quality Management Fees Regulation Bylaw No. 1330, 2021 (MVRD Bylaw No. 1330, 2021)* and directed staff to undertake further engagement with the Province of BC before returning with revised recommendations. This report provides the requested report back. It outlines the outcomes of additional discussions with Provincial staff, summarizes how Provincial recommendations and other engagement input have informed additional bylaw changes, and presents a replacement bylaw for consideration by the Committee and MVRD Board.

Based on the Committee's direction in January, Metro Vancouver staff engaged directly with Provincial staff over the past two months to address the concerns raised, particularly those related to competitiveness challenges in the BC economy. The proposed *MVRD Air Quality Management Fees Regulation Bylaw No. 1440, 2026* presented in this report reflects the outcomes of that focused engagement and repeals and replaces *MVRD Bylaw No. 1330, 2021*. Affected businesses are aware of the revisions and are generally supportive.

The proposed bylaw remains time-sensitive, as delaying adoption could result in higher fees being charged to some permit holders under the current bylaw, as shown below:

Annual Total Emission Fees for Example Facilities			
Sector	**Last Year**	**Current Bylaw**	**Proposed Bylaw**
Wood Product Manufacturer (plywood for construction)	$100,900	$145,600	$115,600
Renewable Energy Producer (agricultural sector)	$8,300	$57,000	$9,800
Animal Feed Manufacturer	$2,200	$172,100	$3,500
Application Fees			
Cement Manufacturer (for local concrete)	No Application	$610,000	$50,000

The proposed bylaw includes changes to:

- Freeze fee rates at 2026 levels until late 2028, once the proposed updates described below have been incorporated;
- Cap permit application fees;
- Clarify and simplify the approach for odorous air contaminants and reduce some fee rates;
- Clarify definitions and align with provincial and federal legislation;
- Clarify fee calculations; and
- Include a provision to review fees by late 2028, and then every four years thereafter.

The changes improve competitiveness, clarity, and predictability of the fees, while supporting the costs of delivering an effective air quality management program.

Recommendation
THAT the MVRD Board:
a) give first, second, and third reading to *Metro Vancouver Regional District Air Quality Management Fees Regulation Bylaw No. 1440, 2026*; and
b) adopt *Metro Vancouver Regional District Air Quality Management Fees Regulation Bylaw No. 1440, 2026*.

2. Overview of Air Quality Communications Tools *pg. 174*
Report dated March 26, 2026 from Derek Jennejohn, Lead Senior Engineer, Air Quality and Climate Action Services, and Jay Soper, Communications Specialist, External Relations.

Executive Summary
This report provides an overview of the tools and approaches Metro Vancouver uses to communicate air quality information to the public. Communication helps to protect public health and encourage regulatory compliance. The tools include real-time air quality data platforms, public education displays, year-round social media, bylaw compliance communications, and air quality warnings. Used together, these tools allow Metro Vancouver to deliver timely public guidance and identify trends — particularly during wildfire smoke or degraded air quality events — while reinforcing its role in monitoring, planning, regulating, and enforcing air quality protection. Access to reliable, timely air quality information can help residents and businesses make cost-effective decisions and contributes to reducing long-term health system costs.

Recommendation
THAT the MVRD Board receive for information the report dated March 26, 2026, titled "Overview of Air Quality Communications Tools".

3. Manager's Report *pg. 183*
Report dated March 11, 2026 from Conor Reynolds, Director, Air Quality and Climate Action Services.

Recommendation
That the Air Quality Committee receive for information the report dated March 11, 2026, titled "Manager's Report".

F. INFORMATION ITEMS

1. Initial Draft Solid Waste Management Plan *pg. 186*

G. OTHER BUSINESS

H. RESOLUTION TO CLOSE MEETING
Note: The Committee must state by resolution the basis under section 90 of the Community Charter on which the meeting is being closed. If a member wishes to add an item, the basis must be included below.

I. ADJOURNMENT

THAT the Air Quality and Climate Committee adjourn its meeting of April 10, 2026.

Membership:

Chair, Lisa Dominato, Vancouver
Vice Chair, Dennis Marsden, Coquitlam
Belcarra, Jamie Ross
Burnaby, Alison Gu
Electoral Area A, Jen McCutcheon
Langley City, Rosemary Wallace
Langley Township, Tim Baillie
Lions Bay, Ken Berry
Maple Ridge, Judy Dueck
Maple Ridge, Dan Ruimy
Port Moody, Meghan Lahti
Richmond, Bill McNulty
Surrey, Doug Elford
West Vancouver, Linda Watt

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SERVICES AND SOLUTIONS FOR A LIVABLE REGION

METRO VANCOUVER REGIONAL DISTRICT
AIR QUALITY COMMITTEE

MEETING

Friday, January 16, 2026
9:00 am
28th Floor Committee Room, 4515 Central Boulevard, Burnaby, British Columbia

MINUTES

MEMBERS PRESENT:
Chair, Director Lisa Dominato, Vancouver
Vice Chair, Councillor Dennis Marsden, Coquitlam
Langley Township, Councillor Tim Baillie
Lions Bay, Director Ken Berry * (arrived at 9:23 am)
Maple Ridge, Councillor Judy Dueck
Surrey, Director Doug Elford
Burnaby, Councillor Alison Gu
Electoral Area A, Director Jen McCutcheon
Richmond, Director Bill McNulty
Belcarra, Director Jamie Ross
Maple Ridge, Director Dan Ruimy* (arrived at 9:03 am)
Langley City, Councillor Rosemary Wallace
West Vancouver, Councillor Linda Watt

*denotes electronic meeting participation as authorized by the *Procedure Bylaw*

MEMBERS ABSENT:
Port Moody, Director Meghan Lahti

STAFF PRESENT:
Conor Reynolds, Director, Air Quality and Climate Action Services
Hadir Ali, Legislative Services Coordinator, Board and Information Services
Esther Bérubé, Division Manager, Air Quality Bylaw and Regulation Development, Air Quality and Climate Action Services
Kathy Preston, Director, Environmental Regulation and Enforcement, Air Quality and Climate Action Services
Lise Townsend, Division Manager Air Quality and Climate Action Policy, Air Quality and Climate Action Services

A. ADOPTION OF THE AGENDA

1. January 16, 2026 Meeting Agenda

It was MOVED and SECONDED
THAT the Air Quality Committee adopt the agenda for its meeting scheduled for January 16, 2026 as circulated.

CARRIED

B. ADOPTION OF THE MINUTES

No items presented.

C. DELEGATIONS

No items presented.

D. INVITED PRESENTATIONS

No items presented.

E. REPORTS FROM COMMITTEE OR CHIEF ADMINISTRATIVE OFFICER

1. 2026 Air Quality Committee Meeting Schedule and Work Plan

Report dated January 7, 2026 from Conor Reynolds, Director, Air Quality and Climate Action Services, providing the Air Quality Committee with its 2026 Work Plan, Terms of Reference, and the Annual Meeting Schedule.

Conor Reynolds provided the committee with a presentation titled "2026 Air Quality Committee Meeting Schedule and Work Plan" and highlighted the committee's Terms of Reference and Work Plan.

9:03 am Director Ruimy joined the meeting.

It was MOVED and SECONDED
THAT the Air Quality Committee:

a) receive for information the Air Quality Committee Terms of Reference and the 2026 Annual Meeting Schedule, as presented in the report dated January 7, 2026, titled "2026 Air Quality Committee Meeting Schedule and Work Plan"; and
b) endorse the 2026 Air Quality Committee Work Plan, as presented in the report dated January 7, 2026, titled "2026 Air Quality Committee Meeting Schedule and Work Plan".

CARRIED

2. MVRD Air Quality Management Fees Regulation Amendment Bylaw No. 1440, 2026

Report dated January 8, 2026 from Gaurav Singh, Air Quality Planner, Air Quality and Climate Action Services, and Esther Bérubé, Division Manager, Air Quality Bylaw and Regulation Development, Air Quality and Climate Action Services, seeking MVRD Board adoption of *MVRD Amendment Bylaw No. 1440, 2026*, which describes recommended amendments to *MVRD Bylaw No. 1330, 2021*.

Conor Reynolds, Esther Bérubé, and Kathy Preston gave the committee a presentation titled "Air Quality Management Fees Bylaw" and provided an overview of recommended amendments to the Metro Vancouver Air Quality Management Fees Regulation Bylaw No. 1330, 2021, which include but are not limited to clearer definitions, caps on permit application fees, and clear rules and simplified, reduced fee rates for a shorter list of odorous air contaminants.

Members were informed that staff engaged with a range of interested parties, including the Ministry of Environment and Parks, the Ministry of Jobs and Economic Growth, the Ministry of Agriculture and Food, impacted businesses, residents, and regional health authorities. Staff noted that the amendments are time sensitive, as they are intended to rectify ambiguities and avoid the application of higher fees that would be charged in some cases if the bylaw is not amended soon.

Members were informed that, despite engagement and ongoing discussions, some items in the bylaw remain unresolved with the BC government.

It was MOVED and SECONDED
THAT the Air Quality Committee refer the report dated January 8, 2026, titled "MVRD Air Quality Management Fees Regulation Amendment Bylaw No. 1440, 2026" back to staff for further engagement with the province.

CARRIED

3. BC Utilities Commission Proceeding on BC Hydro's 2025 Integrated Resource Plan
Report dated January 7, 2026 from Lise Townsend, Division Manager Air Quality and Climate Action Policy, Air Quality and Climate Action Services, and Sara Muir, Air Quality Planner, Air Quality and Climate Action Services, seeking the MVRD Board's approval for Metro Vancouver to participate as an intervener in the BCUC proceeding on BC Hydro's 2025 Integrated Resource Plan (2025 IRP), in coordination with other local governments.

Lise Townsend provided the committee with a verbal overview of the report, noting that participating as interveners in the BCUC proceeding aligns with previous MVRD Board direction, supports Metro Vancouver's role as an energy user and producer, and provides an opportunity to advocate for regional interests in clean energy to support economic growth, housing, transportation, infrastructure, and alignment with climate policy.

It was MOVED and SECONDED
THAT the MVRD Board direct staff to:
a) participate as an intervener in the BC Utilities Commission proceeding titled "BC Hydro's 2025 Integrated Resource Plan";
b) analyze and provide input to the proceeding to align with Board-adopted policies and targets for regional air quality, clean and renewable energy, and GHG reduction, including submitting requests for information, participating in a workshop, and providing comments, evidence, and a final argument as appropriate; and
c) report back to the Air Quality Committee and the MVRD Board on the outcomes of the proceeding.

CARRIED

4. Manager's Report

Report dated December 22, 2025 from Conor Reynolds, Director, Air Quality and Climate Action Services, informing the Committee that staff are currently assessing the Province's response to the MVRD Board's three UBCM resolutions in 2024, calling for increased provincial funding for (1) public and multiunit residential building EV charger deployment, (2) zero emissions heating and cooling equipment, and (3) active transportation infrastructure, and will report back to the committee as appropriate.

It was MOVED and SECONDED
THAT the Air Quality Committee Receive for Information the report date December 22, 2025, titled "Manager's Report".

CARRIED

F. INFORMATION ITEMS

1. Solid Waste Management Plan – Options Analysis Update

G. OTHER BUSINESS

No items presented.

H. RESOLUTION TO CLOSE MEETING

No items presented.

I. ADJOURNMENT

It was MOVED and SECONDED
THAT the Air Quality Committee adjourn its meeting of January 16, 2026.

CARRIED
(Time: 10:04 am)

Hadir Ali,
Legislative Services Coordinator

Lisa Dominato,
Chair

82075443

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SERVICES AND SOLUTIONS FOR A LIVABLE REGION

To: Air Quality Committee

From: Gaurav Singh, Air Quality Planner, Air Quality and Climate Action Services
Esther Bérubé, Division Manager, Air Quality Bylaw and Regulation Development, Air Quality and Climate Action Services

Date: April 1, 2026 Meeting Date: April 10, 2026

Subject: **MVRD Air Quality Management Fees Regulation Bylaw No. 1440, 2026**

RECOMMENDATION

THAT the MVRD Board:

a) give first, second, and third reading to *Metro Vancouver Regional District Air Quality Management Fees Regulation Bylaw No. 1440, 2026*; and

b) adopt *Metro Vancouver Regional District Air Quality Management Fees Regulation Bylaw No. 1440, 2026*.

EXECUTIVE SUMMARY

At its January 16, 2026 meeting, the Air Quality Committee considered proposed amendments to *MVRD Air Quality Management Fees Regulation Bylaw No. 1330, 2021 (MVRD Bylaw No. 1330, 2021)* and directed staff to undertake further engagement with the Province of BC before returning with revised recommendations. This report provides the requested report back. It outlines the outcomes of additional discussions with Provincial staff, summarizes how Provincial recommendations and other engagement input have informed additional bylaw changes, and presents a replacement bylaw for consideration by the Committee and MVRD Board.

Based on the Committee's direction in January, Metro Vancouver staff engaged directly with Provincial staff over the past two months to address the concerns raised, particularly those related to competitiveness challenges in the BC economy. The proposed *MVRD Air Quality Management Fees Regulation Bylaw No. 1440, 2026* presented in this report reflects the outcomes of that focused engagement and repeals and replaces *MVRD Bylaw No. 1330, 2021*. Affected businesses are aware of the revisions and are generally supportive.

The proposed bylaw remains time-sensitive, as delaying adoption could result in higher fees being charged to some permit holders under the current bylaw, as shown below:

Annual Total Emission Fees for Example Facilities			
Sector	**Last Year**	**Current Bylaw**	**Proposed Bylaw**
Wood Product Manufacturer (plywood for construction)	$100,900	$145,600	$115,600
Renewable Energy Producer (agricultural sector)	$8,300	$57,000	$9,800
Animal Feed Manufacturer	$2,200	$172,100	$3,500
Application Fees			
Cement Manufacturer (for local concrete)	No Application	$610,000	$50,000

The proposed bylaw includes changes to:

- Freeze fee rates at 2026 levels until late 2028, once the proposed updates described below have been incorporated;
- Cap permit application fees;
- Clarify and simplify the approach for odorous air contaminants and reduce some fee rates;
- Clarify definitions and align with provincial and federal legislation;
- Clarify fee calculations; and
- Include a provision to review fees by late 2028, and then every four years thereafter.

The changes improve competitiveness, clarity, and predictability of the fees, while supporting the costs of delivering an effective air quality management program.

PURPOSE

To seek MVRD Board adoption of *MVRD Air Quality Management Fees Regulation Bylaw No. 1440, 2026* (*MVRD Bylaw No. 1440, 2026)* presented in **Attachment 1** to this report, which repeals and replaces *MVRD Bylaw No. 1330, 2021*.

BACKGROUND

The current air quality fees bylaw (*MVRD Bylaw No. 1330, 2021*) was adopted on October 29, 2021 to update fee rates for authorized discharges of air contaminants. At its May 23, 2025 meeting, the MVRD Board directed staff to engage on proposed amendments to *MVRD Bylaw No. 1330, 2021*. The Air Quality Committee considered staff recommendations for amendments at its January 16, 2026 meeting and referred them back to staff for further engagement with the Province. Revised recommendations are now in front of the Committee and Board for consideration. The recommendations are informed by the engagement that occurred between June 2025 and March 2026.

REGIONAL BYLAW FOR AIR QUALITY FEES

Metro Vancouver is responsible for managing air quality in the region under delegated authority from the Province through the *Environmental Management Act*. This includes authority to regulate air contaminant emissions, and to establish fees to support the air quality regulatory program. Metro Vancouver protects air quality through emission regulations and site-specific authorizations (permits and approvals) to control the discharge of air contaminants. Metro Vancouver has charged fees for applications for authorization since 1973 (Reference 1), and for authorized air emissions since 1992 (Reference 2) to support the costs of delivering the air quality regulatory program and to encourage emissions reduction.

The current *MVRD Bylaw No. 1330, 2021* was designed to strengthen cost recovery and to support the principles of continuous improvement in emissions reduction and discharger-pay in proportion to impact. Since 2022, staff have monitored bylaw implementation and listened to feedback from permit holders and other interested parties. As staff implemented *MVRD Bylaw No. 1330, 2021*, several opportunities for improvement emerged, including the need for clearer rules, more predictable and equitable fees, stronger competitiveness with other jurisdictions, and alignment with federal and provincial legislation.

ENGAGEMENT ON PROPOSED BYLAW UPDATES

The engagement program for the bylaw updates was designed to hear from those likely to comment, be impacted, or have a role in implementation. This included the regulated community, other governments (including health authorities), and interested residents. The engagement, which launched in June 2025, described the proposed updates in a discussion paper (Reference 3) and sought feedback to shape an effective and practical bylaw and identify reasonable regulatory fees.

From June 2025 to March 2026, staff received input through 82 survey responses, 23 letters and emails, and over a hundred written questions and comments. There was also feedback from two webinars, six meetings by request, and three municipal resident advisory committees.
Feedback from the Province and regulated businesses focused on the following key themes:

- Concern about costs to industry from increases to all air contaminant fees in the current bylaw
- Importance of maintaining industry competitiveness and benchmarking with other jurisdictions for application fees and emission fees
- Concerns about complexity and costs to permit holders surrounding measurement of odorous air contaminants.

During engagement, staff from the Province recommended the following amendments to MVRD Bylaw No. 1330, 2021, given concerns related to competitiveness challenges in the BC economy:

- Freeze fee rates;
- Cap permit application fees at a lower level; and
- Clarify and simplify the approach for odorous air contaminants and reduce some fee rates.

Additional themes from engagement feedback from regulated businesses, other governments (including health authorities), and interested residents included:

- Support for consistent scaling of fees to impacts
- Need for cost transparency
- Need for efficiency and predictability of fees
- Concerns over unintended consequences such as higher costs for construction and agrifood industry if fees and regulatory costs are high, or reduced involvement of health authorities in permit review processes if emission impacts are considered low and charged low fees
- Mixed support for incentives to reduce emissions
- Balancing bylaw outcomes with regional goals such as prosperity, health, and quality of life

At its January 16, 2026 meeting, Metro Vancouver's Air Quality Committee considered staff recommendations for bylaw amendments and referred them back to staff for further discussion with the Province. Staff from both organizations worked toward freezing fee rates and further addressing bylaw ambiguities, application fee caps, and the framework for charging fees for odorous air contaminants, as presented in the proposed bylaw in this report. On March 6, 2026, Metro Vancouver staff met with the Deputy Minister of Environment and Parks and the Deputy Minister of Jobs and Economic Growth, who indicated that the revised changes were more in alignment with their recommendations. Interested parties were informed of the changes and offered the opportunity to provide feedback. Interested parties, including both cement plants and agricultural producers, were generally supportive and recognized that the changes were responsive to feedback. Correspondence is included in the full engagement summary in **Attachment 2**.

Staff considered all engagement input in shaping the recommended changes. The full engagement summary includes correspondence between the Province and Metro Vancouver and letters from health authorities, industry, and residents.

RECOMMENDED BYLAW CHANGES

The recommended changes are presented in the proposed *MVRD Bylaw No. 1440, 2026* (**Attachment 1**) for the MVRD Board's consideration. A blacklined version of *MVRD Bylaw No. 1330, 2021* (**Attachment 3**) compares the current bylaw language to the proposed bylaw.

Freeze Fee Rates until 2028

The recommended changes include keeping all air contaminant fee rates at the proposed bylaw's 2026 levels until December 31, 2028. Under this approach, the fee increases scheduled under the current bylaw would not take effect, enhancing competitiveness for permit holders.

For 2029 and 2030, the recommended changes would reduce fee rates to the levels currently set for 2027 and 2028 in Schedules A-7 and A-8 of *MVRD Bylaw No. 1330, 2021*, with the addition of fee rates introduced through *MVRD Bylaw No. 1440, 2026*. This results in significantly lower fee rates than those currently scheduled to take effect.

All fee rates and application fees will be reviewed and updated where appropriate, with consideration of input from engagement, research, and financial analysis, by the end of 2028 and every four years thereafter.

Introduce a Cap on Application Fees

MVRD Bylaw No. 1330, 2021 currently has no maximum application fee for businesses seeking permits or approvals. The recommended changes introduce a cap on application fees, with different caps applied to new facilities and to existing facilities that must apply for a new permit when their current one expires.

For new facilities and for significant amendments to existing permits, the recommended changes include an application fee cap of $110,000. The proposed fee cap reflects the base level of effort required to assess complex permit applications.

For existing facilities with expiring permits, the recommended changes introduce an application fee cap of $50,000.

In the discussion paper (Reference 3), staff initially proposed an application fee cap of $450,000 for permits, approvals, and amendments. This upper limit reflected Metro Vancouver's experience with the application process for complex, high-emitting businesses. The proposed application fee caps have been reduced in consideration of feedback from industry and the Province on affordability and economic competitiveness, as well as a benchmarking comparison with other jurisdictions' regulatory fees and approaches to cost recovery (**Attachment 4**).

While some high-profile, complex applications may require more effort to assess, introducing application fee caps provides greater competitiveness and affordability for businesses while supporting the permitting process.

Simplify Rules and Reduce Fee Rates for Odorous Air Contaminants

Fee rates for odorous air contaminants in *MVRD Bylaw No. 1330, 2021* were adopted in 2021 with large increases scheduled for 2025. These fee rates were developed at a time of high complaint levels and would have resulted in large cost increases for some facilities had they been applied. In addition, the current bylaw language makes it hard to calculate fees for odorous air contaminants, and this has caused confusion for regulated businesses and limited cost recovery for Metro Vancouver.

The recommended changes address these issues and respond to feedback and specific requests from the Province for a simpler and more affordable framework. The recommended changes are:

- Remove the former Schedule B for odorous air contaminants and replace it with a simpler approach aligned with the framework for all air contaminants.
- Clarify the rule that fees for odorous air contaminants are based on emission limits in permits. If no limit is listed in a permit and emissions are required to be measured, the fee will be based on measured emissions that are above the analytical detection limit.
- Reintroduce a fee rate for total reduced sulphur air contaminants. Some permits for smaller, lower-emitting facilities have emission limits for total reduced sulphur only, when it comes to odorous air contaminants.
- Reduce the number of additional odorous air contaminants for which fees are applicable down to four new groups of air contaminants that have been detected at permitted facilities and that can be measured with published methods.
- Reduce fee rates for odorous air contaminants starting in 2026 and keep them steady until 2028. Even by 2030, fee rates would remain well below current fee rates.
- Charge the same fee rate for permitted and measured odorous air contaminants, instead of charging four times more for measured contaminants.

These changes make the process more transparent and predictable. They also help Metro Vancouver recover costs of regulating discharges of odorous air contaminants from the seven facilities permitted for these emissions.

Since odorous air contaminants have been regulated more comprehensively, Metro Vancouver and some member jurisdictions have seen a drop in air quality complaints, as shown in **Attachment 5**. Fees for odorous air contaminants also provide an incentive for businesses to reduce these emissions.

Attachment 6 shows the change in fee rates for the discharge of odorous air contaminants over time.

Update Definitions
The current bylaw has some overlapping definitions for categories of air contaminants. A substance can fall into more than one category, which affects the fee rate that applies. The recommended changes are:

- Clarify definitions for hazardous air pollutants and volatile organic compounds so they are easier to understand and apply, in response to feedback from the Province.
- Align Metro Vancouver's definitions with updated federal and provincial laws, specifically the *Canadian Environmental Protection Act* and BC's *Public Notification Regulation*.

These updates will make the rules clearer and give businesses more certainty and predictability about which fees apply to them.

Clarify How Fees are Calculated
Staff heard that the current bylaw language makes it difficult for permit holders to understand how fees are calculated for some air contaminants. The lack of clarity affects their ability to predict their fees and plan financially. Some substances listed in the bylaw fit into more than one category of air contaminants even after updated definitions, due to a substance's chemical or physical properties that fit into multiple categories (for example, a substance could be part of total reduced sulphur compounds and be hazardous).

The proposed updated bylaw will improve clarity:

- Only one fee rate would apply to that substance, and it will be the highest applicable fee rate for that substance to reflect its potential impact.
- If a facility pays for all combined odorous air contaminants from an emission source, it will not pay extra fees for emissions of total reduced sulphur or the four new groups of odorous air contaminants, but it could pay fees for other air contaminants from that emission source.

These recommended changes make fees easier to understand and predict. They also follow the principle that air contaminants should have higher fees if the contaminants have the potential to have greater impacts on parameters identified in the BC *Environmental Management Act* such as human health, physical discomfort, business operations, or the usefulness of the environment (Reference 4).

Interest on Overdue Payments
Staff recommend adding a provision for charging interest on overdue payments consistent with bylaws adopted by the Greater Vancouver Sewerage and Drainage District Board. Introducing interest charges encourages timely payment of fees and supports cost recovery.

NEXT STEPS
If the MVRD Board adopts *MVRD Bylaw No. 1440, 2026*, the changes will apply going forward. The MVRD Board will review the bylaw again by late 2028 and then every four years thereafter.

ALTERNATIVES
1. THAT the MVRD Board:
   a) give first, second, and third reading to *Metro Vancouver Regional District Air Quality Management Fees Regulation Bylaw No. 1440, 2026*; and
   b) adopt *Metro Vancouver Regional District Air Quality Management Fees Regulation Bylaw No. 1440, 2026*.

2. THAT the MVRD Board receive for information the report dated April 1, 2026, titled "MVRD Air Quality Management Fees Regulation Bylaw No. 1440, 2026".

FINANCIAL IMPLICATIONS
The recommended changes will make the rules for calculating fees clearer and will lower fee rates. This also avoids higher fees being charged in some cases if the bylaw is not amended this year, as shown in the following table:

Annual Total Emission Fees for Example Facilities			
Sector	**Last Year**	**Current Bylaw**	**Proposed Bylaw**
Wood Product Manufacturer (plywood for construction)	$100,900	$145,600	$115,600
Renewable Energy Producer (agricultural sector)	$8,300	$57,000	$9,800
Animal Feed Manufacturer	$2,200	$172,100	$3,500
Application Fees			
Cement Manufacturer (for local concrete)	No Application	$610,000	$50,000

The financial implications of adopting *MVRD Bylaw 1440, 2026* would be:

- Freezing fee rates at 2026 levels until 2028, and reducing fee rates for 2029 and 2030, will reduce fees and associated revenue for the air quality management program by an estimated $2 million cumulatively. In the short term, this revenue shortfall can be covered through the Air Quality General Reserve, subject to MVRD Board approval through the annual budget process. However, relying on reserves is not financially sustainable. To ensure the program remains fully cost-recovered over the longer term, future adjustments to fee rates or program costs will be required.
- An application fee cap of $110,000 for new permits and significant amendments is expected to cover Metro Vancouver's costs for most applications based on the base level of effort for assessing permit applications for complex facilities. The $50,000 application fee cap for facilities with expiring permits may not fully recover the costs of assessing some applications. Application fee caps should be reviewed as part of the proposed rate review planned for 2028.
- Total revenues from regulatory fees for discharges of odorous air contaminants from the seven facilities permitted for these substances are likely to increase in phases (from $11,000 in 2024 and $3,000 in 2025, to about $60,000 in 2026, to an estimated $85,000 in 2030) due to clarification of how fees are charged for odorous air contaminants. This will bring Metro Vancouver closer to recovering the program costs for regulating discharges of odorous air contaminants, while providing clarity to permitted facilities.
- The regulatory program will continue to be funded in part through tax requisitions until such time as a full cost-recovery framework is in place.

OTHER IMPLICATIONS

Implications for Member Jurisdictions

The recommended changes would help support Metro Vancouver's regulatory program, which works to reduce emissions from regulated facilities, including those that generate odorous air contaminants. Reducing these emissions can contribute to fewer odour-related complaints received by member jurisdictions over time.

Some member jurisdictions rely on private facilities to manage green bin materials, and changes to regulatory fees may be passed on to those jurisdictions. However, the recommended changes reflected in *MVRD Bylaw No. 1440, 2026* would provide greater certainty about future fee levels, supporting more predictable budgeting and service planning for member jurisdictions.

Implications for Businesses

The recommended changes would reduce emission fees and give businesses more clarity and predictability. Businesses would be able to forecast fees for the authorized discharge of air contaminants and evaluate the business case for reducing those air contaminants. Although most application fees have been less than $10,000 in the past ten years, no application fees for authorization of emissions from new facilities would exceed $110,000, and no application fee for authorization of emissions from facilities that have an expiring permit would exceed $50,000. These caps enhance affordability and competitiveness with other jurisdictions.

CONCLUSION

The proposed *MVRD Bylaw No. 1440, 2026* would improve clarity, predictability, fairness, and competitiveness of the fees while adhering to Metro Vancouver's principles of discharger-pay (in proportion to the impact of their emissions), fair cost recovery, and emissions reduction. In response to the Committee's direction in January, staff held focused discussions with Provincial staff to address their concerns related to competitiveness and the practical application of the bylaw. The proposed *MVRD Bylaw No. 1440, 2026* would support Metro Vancouver's regulatory program by establishing fees that are proportionate, transparent, and capable of recovering program costs over time.

Staff recommend Alternative 1, that the MVRD Board adopt *MVRD Air Quality Management Fees Regulation Bylaw No. 1440, 2026*.

ATTACHMENTS

1. MVRD Air Quality Management Fees Regulation Bylaw No. 1440, 2026 - Repeals and replaces MVRD Bylaw No. 1330, 2021.
2. Proposed Amendments to Air Quality Management Fees Bylaw - Engagement Summary, June 2025 to March 2026.
3. MVRD Air Quality Management Fees Regulation Bylaw No. 1330, 2021 – Blacklined Version of Unofficial Consolidation.
4. Benchmarking of Regulatory Fees and Cost Recovery Approaches.
5. Number of Air Quality Complaints received by Metro Vancouver (2021-2025).
6. Fee Rates for Odorous Air Contaminants Trends (2008-2030).

REFERENCES

1. *GVRD Air Pollution Control Bylaw No. 92, 1973*. Available at the Metro Vancouver Library at 4515 Central Boulevard, Burnaby, BC.
2. *GVRD Air Quality Management Bylaw No. 725, 1992*. Available at the Metro Vancouver Library at 4515 Central Boulevard, Burnaby, BC.
3. Metro Vancouver. (2025, May). *Proposed Amendments to Metro Vancouver Regional District Air Quality Management Fees Bylaw No. 1330 - Discussion Paper*. https://metrovancouver.org/services/air-quality-climate-action/Documents/air-quality-permit-fee-change-discussion-paper.pdf.
4. Sahil Bandari et al. (2024, July). *Odor, Air Quality, and Well-Being: Understanding the Urban Smellscape Using Crowd-Sourced Science.* Environmental Research: Health 2 035012. https://iopscience.iop.org/article/10.1088/2752-5309/ad5ded/meta

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METRO VANCOUVER REGIONAL DISTRICT
BYLAW NO. 1440, 2026
A bylaw to regulate air quality management fees

WHEREAS:

A. The Board of the Metro Vancouver Regional District has enacted Greater Vancouver Regional District Air Quality Management Bylaw No. 1082, 2008; and

B. Greater Vancouver Regional District Air Quality Management Bylaw No. 1082, 2008 contemplates the establishment and payment of fees.

NOW THEREFORE the Board of the Metro Vancouver Regional District enacts as follows:

Citation

1. The official citation of this bylaw is "Metro Vancouver Regional District Air Quality Management Fees Regulation Bylaw No. 1440, 2026". This bylaw may be cited as "Metro Vancouver Regional District Air Quality Management Fees Regulation Bylaw" (in this bylaw, "this Regulation").

Repeal of Bylaw

2. "Metro Vancouver Regional District Air Quality Management Fees Regulation Bylaw No. 1330, 2021" and all amendments thereto are repealed.

Schedules

3. The following schedules are attached to and form part of this Regulation:
    - Schedule A-1, Calculation of Air Contaminant Emission Fees from April 24, 2026 to December 31, 2028;
    - Schedule A-2, Calculation of Air Contaminant Emission Fees from January 1, 2029 to December 31, 2029;
    - Schedule A-3, Calculation of Air Contaminant Emission Fees for January 1, 2030 and later; and
    - Schedule B, List of Hazardous Air Pollutants.

General

4. This Regulation is deemed to be an integral part of the Greater Vancouver Regional District Air Quality Management Bylaw No. 1082, 2008 ("the Bylaw").

5. Terms defined in the Bylaw, or incorporated by reference into the Bylaw, have the same meaning in this Regulation.

Definitions

6. In this Regulation:

    "administrative amendment" means an amendment to a permit or approval for any of the following purposes:
    (a) a change of ownership or name; or
    (b) a change of legal address or mailing address;

"authorized discharge" means:

(a) the quantity of an air contaminant that is authorized by a permit, approval, or emission regulation; or

(b) if the quantity of an air contaminant in the discharge is not specified in a permit, approval, or emission regulation, the quantity of the air contaminant that is:

i. determined from discharge factors applied in accordance with procedures approved by the district director; or

ii. measured in accordance with procedures approved by the district director and further to a requirement in a permit, approval or emission regulation to measure the air contaminant;

"billion cubic metre odour unit" means a volume of one billion cubic metres of gas having an odour concentration of one odour unit per cubic metre of gas;

"coarse particulate matter" means particulate matter with an aerodynamic diameter greater than 2.5 micrometres, excluding diesel particulate matter and metals;

"coarse particulate matter containing soy dust" means coarse particulate matter containing soy;

"diesel particulate matter" means particulate matter that is discharged from the combustion of diesel fuel or an alternative diesel fuel;

"District" means the Metro Vancouver Regional District;

"European Reference Odour Mass" means a conventional quantity value for an odour unit, equal to a defined mass of a reference substance having known odorous properties, as referenced and used in the European Standard EN 13725:2022 ("Stationary source emissions - Determination of odour concentration by dynamic olfactometry and odour emission rate");

"farm business" has the same meaning as in section 1 of the *Farm Practices Protection (Right to Farm) Act,* RSBC 1996, c. 131;

"farm operation" has the same meaning as in section 1 of the *Farm Practices Protection (Right to Farm) Act*;

"fine particulate matter" means particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometres, excluding diesel particulate matter and metals;

"global warming potential" means the 100-year global warming potential of a greenhouse gas, as listed in the most recent Working Group 1 Contribution (The Physical Science Basis) to the most recent Assessment Report of the Intergovernmental Panel on Climate Change, all as corrected from time to time;

"greenhouse gases" means gases that have a global warming potential, and includes carbon dioxide, methane, and other greenhouse gases;

"hazardous air pollutants" means substances introduced into the air that cause or may cause cancer, birth defects, or other major health impacts to humans or any life form, and are listed in Schedule B;

"metals" means metals that are not hazardous air pollutants;

"minor amendment" means an amendment to a permit or approval for any of the following purposes:

(a) a decrease in the authorized quantity of the discharge, emission or stored material;
(b) an increase in the authorized quantity of the discharge, emission or stored material that does not exceed 10% of the authorized quantity;
(c) a change in the authorized quality of the discharge, emission or stored material such that, in the opinion of the district director, the change has or will have an equal or lesser impact on the environment;
(d) a change in a monitoring program; or
(e) a change to the works, method of treatment or any other condition of a permit or approval such that, in the opinion of the district director, the change has or will have an equal or lesser impact on the environment;

"non-photoreactive volatile organic compounds" means any volatile organic compounds, except methane, listed as exclusions under "Volatile organic compounds that participate in atmospheric photochemical reactions" in Schedule 1 (List of Toxic Substances, Part 2) of the *Canadian Environmental Protection Act, 1999*, S.C. 1999, c. 33, as amended from time to time;

"odour concentration" means the number of odour units in a cubic metre of gas at standard conditions (at a temperature of 293 Kelvin (K) and normal atmospheric pressure of 101.3 kilo Pascals (kPa) on a wet basis), as specified in the European Standard EN 13725: 2022 ("Stationary source emissions - Determination of odour concentration by dynamic olfactometry and odour emission rate"), as amended from time to time;

"**odorous air contaminant**" is a type of air contaminant, and means any substance that is discharged into the air that, due to its odorous properties,

(a) injures or is capable of injuring the health or safety of a person;
(b) injures or is capable of injuring property or any life form;
(c) interferes or is capable of interfering with the normal conduct of business;
(d) causes or is capable of causing material physical discomfort to a person; or
(e) damages or is capable of damaging the environment;

"odorous air contaminant sensitive receptor location" means a residential location, public space or commercial business location such as restaurants and retail operations where owners, operators, or occupants may suffer the impairment of enjoyment of private or public space or business loss due to the presence of odorous air contaminants;

"odour unit" means an amount of an odorous air contaminant, or odorous air contaminants, that, when evaporated into one cubic metre of neutral gas at standard conditions (at a temperature of 293 Kelvin (K) and normal atmospheric pressure of 101.3 kilo Pascals (kPa) on a wet basis), elicits a physiological response from a panel that is equivalent to that elicited by one European Reference Odour Mass when evaporated into one cubic metre of neutral gas at

standard conditions, all as determined in accordance with European Standard EN 13725:2022 ("Stationary source emissions - Determination of odour concentration by dynamic olfactometry and odour emission rate"), as amended from time to time;

"other greenhouse gases" means greenhouse gases including nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulphur hexafluoride, but does not include carbon dioxide and methane;

"photoreactive volatile organic compounds" means any volatile organic compounds not defined in this Regulation as either hazardous air pollutants or non-photoreactive volatile organic compounds;

"significant amendment" means an amendment to a permit or approval which is not an administrative amendment or a minor amendment;

"total reduced sulphur (TRS)" means one or more substances introduced into the air that contain one or more sulphur atoms in their reduced state;

"volatile aldehydes" means volatile organic compounds containing a carbonyl group bonded to at least one hydrogen atom;

"volatile amines" means volatile organic compounds with a structure similar to ammonia where one or more hydrogen atoms are replaced with organic groups;

"volatile fatty acids" means volatile organic compounds containing a carbonyl group and a hydroxyl group bonded to the same carbon in a chain of seven or fewer carbon atoms;

"volatile ketones" means volatile organic compounds containing a carbonyl group bonded to two carbon atoms; and

"whole emission discharge of odorous air contaminants" means the total discharge of odorous air contaminants from an emission source in one year and is the product of the total odorous air contaminants in the discharge, as measured in accordance with European Standard EN 13725:2022 ("Stationary source emissions - Determination of odour concentration by dynamic olfactometry and odour emission rate"), as amended from time to time, expressed in odour units, multiplied by the total volume of the discharge, expressed in billion cubic metres.

Payment of Fees

7. Every person who applies for a permit or an approval, or any amendment of a permit or approval, must pay the application fees set out in this Regulation.

8. Every person who discharges air contaminants under an emission regulation, a permit, or an approval must pay the applicable annual or duration fees set out in this Regulation.

9. Emission fees are payable under this Regulation for emission fees related to the discharge of a greenhouse gas, unless the provincial carbon tax applies to the discharge of that greenhouse gas.

Calculation of Air Contaminant Emission Fees

10. The District will charge air contaminant emission fees calculated in accordance with Schedules A-1 to A-3 [*Calculation of Air Contaminant Emission Fees*] for the applicable year, but subject to sections 11 through 14.

11. If the authorized discharge for an emission source includes a substance that meets the definition of more than one air contaminant listed in Schedules A-1 to A-3 (a "listed air contaminant"), the District will charge only one air contaminant emission fee for the substance, calculated at the highest emission fee rate of all that apply to the substance.

12. Despite section 11 , if a permit, approval, or emission regulation for an emission source authorizes a quantity, or requires the measurement of, a whole emission discharge of odorous air contaminants in addition to having an authorized discharge of other listed air contaminant(s), the District must charge both the air contaminant emission fee that applies to each authorized listed air contaminant and the air contaminant emission fee for the whole emission discharge of odorous air contaminants, except if the air contaminant is, or is part of, total reduced sulphur (TRS), volatile aldehydes, volatile amines, volatile fatty acids, or volatile ketones, in which case the District must charge only the emission fees as set out in sections 13 and 14 .

13. If a permit, approval, or emission regulation, for an emission source,
    (a) authorizes a quantity of whole emission discharge of odorous air contaminants (whether or not the permit, approval, or emission regulation authorizes a quantity of total reduced sulphur (TRS), volatile aldehydes, volatile amines, volatile fatty acids, and volatile ketones for the same emission source), or
    (b) requires the measurement of a whole emission discharge of odorous air contaminants (but does not specify a quantity of same), and does not, for the same emission source, specify a quantity of total reduced sulphur (TRS), volatile aldehydes, volatile amines, volatile fatty acids, or volatile ketones,

    then for that emission source, the District must charge the air contaminant emission fee for the whole emission discharge of odorous air contaminants and the air contaminant emission fee for any authorized discharge of a listed air contaminant other than total reduced sulphur (TRS), volatile aldehydes, volatile amines, volatile fatty acids, and volatile ketones.

14. If a permit, approval, or emission regulation, for an emission source,
    (a) requires the measurement of a whole emission discharge of odorous air contaminants (but does not specify a quantity of whole emission discharge of odorous air contaminants), and
    (b) for the same emission source, authorizes a quantity of total reduced sulphur (TRS), volatile aldehydes, volatile amines, volatile fatty acids, or volatile ketones,

    then for that emission source, the District must charge the air contaminant emission fees for total reduced sulphur (TRS), volatile aldehydes, volatile amines, volatile fatty acids, and volatile ketones, and the air contaminant emission fees for any authorized discharge of other listed air contaminants from that emission source other than a whole emission discharge of odorous air contaminants.

15. **"Total emission fees**" are calculated as the sum of all air contaminant emission fees applicable for:
    (a) annual emissions authorized by a permit or emission regulation; or

(b) the duration of the approval.

Permit and Approval Application Fees

16. The application fee payable to the District for an application:
    (a) for a new permit or new approval is $1,000 plus twice the total emission fees payable for the emissions specified in the application, to a maximum of $110,000; and
    (b) for a permit or approval authorizing the discharge of air contaminants from a facility or operation that has an expiring permit or expiring approval is $1,000 plus the total emission fees payable for the emissions specified in the application, to a maximum of $50,000.

17. Despite section 16, the application fee payable to the District for an application:
    (a) for an open burning approval associated with a farm operation and conducted on a farm as part of a farm business is $100; and
    (b) for all other open burning approvals is $1,000.

Permit and Approval Amendment Application Fees

18. The application fee payable to the District for an application:
    (a) for an administrative amendment is $240;
    (b) for a minor amendment is $500 plus twice the increase, if any, in the total emission fees payable for the emissions specified in the application; and
    (c) for a significant amendment is $1,000 plus twice the increase in the total emission fees payable for the emissions specified in the application, to a maximum of $110,000.

Application Fee Payment

19. An application fee must be paid at the time the application is submitted and is not refundable by reason only that the permit, approval, or amendment application is refused.

Annual Fees

20. A holder of a permit must pay annually the total emission fees plus an administrative fee of $200, within 35 days of the date the District issued the invoice for the annual fees.

Approval Duration Fees

21. A holder of an approval, other than an open burning approval, must pay the total emission fees for the period authorized by the approval plus an administrative fee of $200 within 35 days of the date the District issued the invoice for the approval duration fees.

Cancellations and Amendments

22. If a permit or approval is cancelled at the request of the holder of the permit or approval, the holder is required to pay to the District any prorated amount of fees as determined by the District. The District will issue an invoice for any prorated amount of fees due or will refund the amount of any overpayment of the applicable fees. Refunds for less than $100 will not be issued.

23. If a permit or approval is amended, the District will:
    (a) issue an invoice for any prorated amount of fees due;
    (b) credit the amount of any overpayment against any fees payable in the subsequent year; or
    (c) if no fees are payable in the subsequent year, refund any overpayment to the holder of the permit or approval. Refunds for less than $100 will not be issued.

24. If a permit or approval is amended, the permit or approval holder will pay any amount owing to the District within 35 days of the date the District issued the invoice under section 23(a).

Interest Charges

25. Where a person fails or refuses to pay an invoice within 40 days of the date the invoice was issued, the person must pay interest at the rate of 1.25% per month (15% per year) compounded monthly and calculated daily on all amounts overdue, including all overdue interest, from the date the charge was due to the date of payment.

Fee Reduction

26. Where air contaminant emission fees are calculated for whole emission discharge of odorous air contaminants for an emission source that either (i) has an odour unit emission limit in a permit or approval, or (ii) has a permit or approval requirement to measure odour units, the permittee or approval holder may apply for a reduction in air contaminant emission fees, as follows:
    (a) Air contaminant emission fees for whole emission discharge of odorous air contaminants may be reduced by 75% if the permittee or approval holder demonstrates to the satisfaction of the district director through approved dispersion modelling that the whole emission discharge of odorous air contaminants will not exceed one odour unit at the nearest odorous air contaminant sensitive receptor location 99.5% of the time based on a ten-minute average of authorized maximum (permitted) emissions, or 99.8% of the time based on measured emissions; and
    (b) If conditions of section 26(a) cannot be met, air contaminant emission fees for whole emission discharge of odorous air contaminants may be reduced by 50% if the permittee or approval holder demonstrates to the satisfaction of the district director through approved dispersion modelling that the whole emission discharge of odorous air contaminants will not exceed three odour units at the nearest odorous air contaminant sensitive receptor location 99.5% of the time based on a ten-minute average of authorized maximum (permitted) emissions, or 99.8% of the time for measured emissions.

Review of Emission Fee Rates

27. The District will review and update emission fee rates for 2029 and later, as well as application fees, where appropriate, with consideration of research, financial analysis, input from interested parties, and other relevant factors, by the end of December 31, 2028 and then at a minimum frequency of once every four years. For clarity, the initial review will include a review of Schedules A-2 and A-3.

Severability

28. If any portion of this Regulation is deemed *ultra vires*, illegal, invalid, or unenforceable in any way in whole or in part by any court of competent jurisdiction, such decision will not be deemed to invalidate or void the remainder of the Regulation. The parts so held to be *ultra vires*, illegal, invalid, or unenforceable must be deemed not to have been part of this Regulation from its adoption. The remainder of the Regulation will have the same force and effect as if the parts that have been deemed *ultra vires*, illegal, invalid, or unenforceable had not been included in this Regulation when it was adopted.

Read a first, second, and third time this _____ day of _____, _____.

Adopted this _____ day of _____, _____.

Mike Hurley, Board Chair

Dorothy Shermer, Corporate Officer

Schedule A-1

Schedule A-1: Calculation of Air Contaminant Emission Fees from April 24, 2026 to December 31, 2028

1. From April 24, 2026 to December 31, 2028, **air contaminant emission fees** for the discharge of air contaminants listed in Table A-1 are calculated as follows:

$$Z = A \times B$$

where,

Z is the air contaminant emission fee,

A is the authorized discharge in tonnes of an air contaminant listed in column 1 of Table A-1 or the authorized discharge in billion cubic metre odour units of whole emission discharge of odorous air contaminants listed in column 1 of Table A-1, and

B is the corresponding emission fee rate for that air contaminant or whole emission discharge of odorous air contaminants listed in column 2 of Table A-1.

Table A-1 – Emission Fee Rates for Air Contaminants for April 24, 2026 to December 31, 2028

Column 1 **Air Contaminant (A)**	Column 2 **Emission fee rate (B)**
Ammonia	$73 ($/tonne)
Coarse Particulate Matter	$37 ($/tonne)
Coarse Particulate Matter containing soy dust	$137 ($/tonne)
Diesel Particulate Matter	$3,621 ($/tonne)
Fine Particulate Matter	$1,371 ($/tonne)
Hazardous Air Pollutants	$1,714 ($/tonne)
Metals	$794 ($/tonne)
Methane	$809 ($/tonne)
Nitrogen Oxides (NOx)	$121 ($/tonne)
Non-photoreactive volatile organic compounds	$37 ($/tonne)
Ozone	$194 ($/tonne)
Photoreactive volatile organic compounds	$214 ($/tonne)
Sulphur Oxides (SOx)	$100 ($/tonne)
Total Reduced Sulphur (TRS)	$800 ($/tonne)
Volatile Aldehydes	$1,397 ($/tonne)
Volatile Amines	$2,000 ($/tonne)
Volatile Fatty Acids	$1,603 ($/tonne)
Volatile Ketones	$1,783 ($/tonne)
Whole Emission Discharge of Odorous Air Contaminants	$5 per billion cubic metre odour units
Other (not otherwise specified)	$37 ($/tonne)

Column 1 **Air Contaminant (A)**	Column 2 **Emission fee rate (B)**
Other greenhouse gases	Fee per tonne ($) = provincial carbon tax value of carbon dioxide ($ / tonne) multiplied by the global warming potential of the other greenhouse gas, divided by the global warming potential of carbon dioxide

Schedule A-2

Schedule A-2: Calculation of Air Contaminant Emission Fees from January 1, 2029 to December 31, 2029

1. From January 1, 2029 to December 31, 2029, **air contaminant emission fees** for the discharge of air contaminants listed in Table A-2 are calculated as follows:

$$Z = A \times B$$

where,

Z is the air contaminant emission fee,

A is the authorized discharge in tonnes of an air contaminant listed in column 1 of Table A-2 or the authorized discharge in billion cubic metre odour units of whole emission discharge of odorous air contaminants listed in column 1 of Table A-2, and

B is the corresponding emission fee rate for that air contaminant or whole emission discharge of odorous air contaminants listed in column 2 of Table A-2.

Table A-2 – Emission Fee Rates for Air Contaminants in 2029

Column 1 **Air Contaminant (A)**	Column 2 **Emission fee rate (B)**
Ammonia	$81 ($/tonne)
Coarse Particulate Matter	$39 ($/tonne)
Coarse Particulate Matter containing soy dust	$159 ($/tonne)
Diesel Particulate Matter	$4,286 ($/tonne)
Fine Particulate Matter	$1,586 ($/tonne)
Hazardous Air Pollutants	$1,857 ($/tonne)
Metals	$947 ($/tonne)
Methane	$964 ($/tonne)
Nitrogen Oxides (NOx)	$136 ($/tonne)
Non-photoreactive volatile organic compounds	$39 ($/tonne)
Ozone	$227 ($/tonne)
Photoreactive volatile organic compounds	$237 ($/tonne)
Sulphur Oxides (SOx)	$100 ($/tonne)
Total Reduced Sulphur (TRS)	$960 ($/tonne)
Volatile Aldehydes	$1,676 ($/tonne)
Volatile Amines	$2,400 ($/tonne)
Volatile Fatty Acids	$1,924 ($/tonne)
Volatile Ketones	$2,140 ($/tonne)
Whole Emission Discharge of Odorous Air Contaminants	$6 per billion cubic metre odour units
Other (not otherwise specified)	$39 ($/tonne)

Other greenhouse gases	Fee per tonne ($) = provincial carbon tax value of carbon dioxide ($ / tonne) multiplied by the global warming potential of the other greenhouse gas, divided by the global warming potential of carbon dioxide

Schedule A-3

Schedule A-3: Calculation of Air Contaminant Emission Fees for January 1, 2030 and later

1. From January 1, 2030 and onwards, **air contaminant emission fees** for the discharge of air contaminants listed in Table A-3 are calculated as follows:

$$Z = A \times B$$

where,

Z is the air contaminant emission fee,

A is the authorized discharge in tonnes of an air contaminant listed in column 1 of Table A-3 or the authorized discharge in billion cubic metre odour units of whole emission discharge of odorous air contaminants listed in column 1 of Table A-3, and

B is the corresponding emission fee rate for that air contaminant or whole emission discharge of odorous air contaminants listed in column 2 of Table A-3.

Table A-3 – Emission Fee Rates for Air Contaminants in 2030 and later

Column 1 **Air Contaminant (A)**	Column 2 **Emission fee rate (B)**
Ammonia	$90 ($/tonne)
Coarse Particulate Matter	$40 ($/tonne)
Coarse Particulate Matter containing soy dust	$180 ($/tonne)
Diesel Particulate Matter	$4,950 ($/tonne)
Fine Particulate Matter	$1,800 ($/tonne)
Hazardous Air Pollutants	$2,000 ($/tonne)
Metals	$1,100 ($/tonne)
Methane	$1,120 ($/tonne)
Nitrogen Oxides (NOx)	$150 ($/tonne)
Non-photoreactive volatile organic compounds	$40 ($/tonne)
Ozone	$260 ($/tonne)
Photoreactive volatile organic compounds	$260 ($/tonne)
Sulphur Oxides (SOx)	$100 ($/tonne)
Total Reduced Sulphur (TRS)	$1,152 ($/tonne)
Volatile Aldehydes	$2,012 ($/tonne)
Volatile Amines	$2,880 ($/tonne)
Volatile Fatty Acids	$2,308 ($/tonne)
Volatile Ketones	$2,568 ($/tonne)
Whole Emission Discharge of Odorous Air Contaminants	$7 per billion cubic metre odour units
Other (not otherwise specified)	$40 ($/tonne)

Other greenhouse gases	Fee per tonne ($) = provincial carbon tax value of carbon dioxide ($ / tonne) multiplied by the global warming potential of the other greenhouse gas, divided by the global warming potential of carbon dioxide

Schedule B

Schedule B: List of Hazardous Air Pollutants

Chemical Abstracts Service Number (CAS)	Substance Name
79-34-5	1,1,2,2-Tetrachloroethane
79-00-5	1,1,2-Trichloroethane
57-14-7	1,1-Dimethyl hydrazine
120-82-1	1,2,4-Trichlorobenzene
96-12-8	1,2-Dibromo-3-chloropropane
107-06-2	1,2-Dichloroethane
122-66-7	1,2-Diphenylhydrazine
106-88-7	1,2-Epoxybutane (Ethyloxirane)
75-55-8	1,2-Propylenimine (2-Methyl aziridine)
106-99-0	1,3-Butadiene
78-79-5	1,3-Butadiene, 2-methyl- (C_5H_8)
542-75-6	1,3-Dichloropropene
1120-71-4	1,3-Propane sultone (1,2-Oxathiolane, 2,2-dioxide)
106-46-7	1,4-Dichlorobenzene(p)
123-91-1	1,4-Dioxane (1,4-Diethyleneoxide)
106-94-5	1-Bromopropane
1589-47-5	1-Propanol, 2-methoxy- ($C_4H_{10}O_2$)
540-84-1	2,2,4-Trimethylpentane
1746-01-6	2,3,7,8-Tetrachlorodibenzo-p-dioxin
95-95-4	2,4,5-Trichlorophenol
88-06-2	2,4,6-Trichlorophenol
94-75-7	2,4-D, salts and esters
51-28-5	2,4-Dinitrophenol
121-14-2	2,4-Dinitrotoluene
95-80-7	2,4-Toluene diamine (1,3-Benzenediamine, 4-methyl-)
584-84-9	2,4-Toluene diisocyanate (Benzene, 2,4-diisocyanato-1-methyl-)
53-96-3	2-Acetylaminofluorene
96-29-7	2-Butanone, oxime (C_4H_9NO)
111-76-2	2-Butoxyethanol ($C_6H_{14}O_2$)
532-27-4	2-Chloroacetophenone
79-46-9	2-Nitropropane
91-94-1	3,3-Dichlorobenzidene
119-90-4	3,3-Dimethoxybenzidine
119-93-7	3,3'-Dimethyl benzidine ([1,1’-Biphenyl]-4,4’-diamine, 3,3’-dimethyl-)
Ba101-14-4	4,4-Methylene bis(2-chloroaniline); (Benzenamine, 4,4’-methylenebis[2-chloro-)
101-77-9	4,4'-Methylenedianiline
92-67-1	4-Aminobiphenyl
92-93-3	4-Nitrobiphenyl

Chemical Abstracts Service Number (CAS)	**Substance Name**
100-02-7	4-Nitrophenol
75-07-0	Acetaldehyde
60-35-5	Acetamide
75-05-8	Acetonitrile
98-86-2	Acetophenone
107-02-8	Acrolein
79-06-1	Acrylamide
79-10-7	Acrylic acid
107-13-1	Acrylonitrile
107-05-1	Allyl chloride (3-chloropropene)
62-53-3	Aniline
No applicable CAS number	Antimony Compounds
No applicable CAS number	Arsenic Compounds (inorganic including arsine)
1332-21-4	Asbestos
50-32-8	Benz[a]pyrene (Polycyclic aromatic hydrocarbons)
71-43-2	Benzene (including benzene from gasoline)
100-44-7	Benzene, (chloromethyl)- (C_7H_7Cl)
2536-05-2	Benzene, 1,1'-methylenebis[2-isocyanato- ($C_{15}H_{10}N_2O_2$)
26447-40-5	Benzene, 1,1'-methylenebis[isocyanato- (non-isomeric-specific) ($C_{15}H_{10}N_2O_2$)
93-58-3	Benzene, 1,2-dimethoxy-4-(2-propenyl)- ($C_{11}H_{14}O_2$)
91-08-7	Benzene, 1,3,-diisocyanato-2-methyl- (2,6-TDI) (Toluene diisocyanates ($C_9H_6N_2O_2$))
26471-62-5	Benzene, 1,3,-diisocyanatomethyl- (TDI mixed isomers) (Toluene diisocyanates ($C_9H_6N_2O_2$))
53-19-0	Benzene, 1-chloro-2-[2,2-dichloro-1-(4-chlorophenyl)ethyl]-, which has the molecular formula $C_{14}H_{10}Cl_4$
88-72-2	Benzene, 1-methyl-2-nitro- ($C_7H_7NO_2$)
584-84-9	Benzene, 2,4,-diisocyanato-1-methyl- (2,4-TDI) (Toluene diisocyanates ($C_9H_6N_2O_2$))
205-99-2	Benzo[b]fluoranthene (Polycyclic aromatic hydrocarbons)
205-82-3	Benzo[j]fluoranthene (Polycyclic aromatic hydrocarbons)
207-08-9	Benzo[k]fluoranthene (Polycyclic aromatic hydrocarbons)
98-07-7	Benzotrichloride
100-44-7	Benzyl chloride
No applicable CAS number	Beryllium Compounds
57-57-8	beta-Propiolactone
92-52-4	Biphenyl
117-81-7	Bis(2-ethylhexyl)phthalate (DEHP)
S75-25-2	Bromoform (tribromo-methane)
No applicable CAS number	Cadmium Compounds
156-62-7	Calcium cyanamide

Chemical Abstracts Service Number (CAS)	**Substance Name**
133-06-2	Captan
63-25-2	Carbaryl
75-15-0	Carbon disulfide
56-23-5	Carbon tetrachloride
463-58-1	Carbonyl sulfide
120-80-9	Catechol (1,2-benzenediol)
133-90-4	Chloramben (3-Amino-2,5-dichlorobenzoic acid)
57-74-9	Chlordane
7782-50-5	Chlorine
79-11-8	Chloroacetic acid
108-90-7	Chlorobenzene
510-15-6	Chlorobenzilate
67-66-3	Chloroform
126-99-8	Chloroprene
No applicable CAS number	Chromium Compounds
No applicable CAS number	Cobalt Compounds
No applicable CAS number	Coke Oven Emissions
1319-77-3	Cresols/Cresylic acid (isomers and mixture)
98-82-8	Cumene
No applicable CAS number	Cyanide Compounds, X'CN where X = H' or any other group where a formal dissociation may occur. For example, KCN or Ca(CN)2
556-67-2	Cyclotetrasiloxane, octamethyl- ($C_8H_{24}O_4Si_4$)
334-88-3	Diazomethane
132-64-9	Dibenzofurans
2629-41-4	Dibenzo-para-dioxin ($C_{12}H_8O_2$)
84-74-2	Dibutylphthalate
111-44-4	Dichloroethyl ether (Bis(2-chloroethyl)ether)
111-42-2	Diethanolamine
64-67-5	Diethyl sulfate (diethyl ester sulfuric acid)
60-11-7	Dimethyl aminoazobenzene
79-44-7	Dimethyl carbamoyl chloride
68-12-2	Dimethyl formamide (Formamide, N,N-dimethyl-)
131-11-3	Dimethyl phthalate
77-78-1	Dimethyl sulfate
106-89-8	Epichlorohydrin (l-Chloro-2,3-epoxypropane); Oxirane, (chloromethyl)
111-77-3	Ethanol, 2-(2-methoxyethoxy)- ($C_5H_{12}O_3$)
110-49-6	Ethanol, 2-methoxy-, acetate ($C_5H_{10}O_3$)
140-88-5	Ethyl acrylate (2-Propenoic acid, ethyl ester)
100-41-4	Ethyl benzene
51-79-6	Ethyl carbamate (Urethane), (Carbamic acid, ethyl ester)

Chemical Abstracts Service Number (CAS)	**Substance Name**
75-00-3	Ethyl chloride (Chloroethane)
106-93-4	Ethylene dibromide (Dibromoethane)
107-06-2	Ethylene dichloride (1,2-Dichloroethane)
107-21-1	Ethylene glycol (1,2-Ethanediol)
151-56-4	Ethylene imine (Aziridine)
75-21-8	Ethylene oxide
96-45-7	Ethylene thiourea (2-Imidazolidinethione)
75-34-3	Ethylidene dichloride (1,1-Dichloroethane)
No applicable CAS number	Fine mineral fibers, includes mineral fiber emissions from facilities manufacturing or processing glass, rock, or slag fibers (or other mineral derived fibers) of average diameter 1 micrometer or less
50-00-0	Formaldehyde
No applicable CAS number	Glycol ethers, Includes mono- and di- ethers of ethylene glycol, diethylene glycol, and triethylene glycol R-(OCH2CH2)n -OR' where n = 1, 2, or 3 R = alkyl or aryl groups R' = R, H, or groups which, when removed, yield glycol ethers with the structure: R-(OCH2CH)n-OH. Polymers are excluded from the glycol category.
77-47-4	Hexachlorocyclopentadiene
67-72-1	Hexachloroethane
822-06-0	Hexamethylene-1,6-diisocyanate
680-31-9	Hexamethylphosphoramide
110-54-3	Hexane
103-23-1	Hexanedioic acid, bis(2-ethylhexyl) ester ($C_{22}H_{42}O_4$)
302-01-2	Hydrazine
7647-01-0	Hydrochloric acid
7664-39-3	Hydrogen fluoride (Hydrofluoric acid)
7783-06-4	Hydrogen sulfide
123-31-9	Hydroquinone (1,4-Benzenediol)
193-39-5	indeno[1,2,3-cd]pyrene (Polycyclic aromatic hydrocarbons)
9016-87-9	Isocyanic acid, polymethylenepolyphenylene ester ($C_{15}H_{10}N_2O_2 \bullet [C_8H_5NO]_n$)
78-59-1	Isophorone
No applicable CAS number	Lead Compounds
58-89-9	Lindane (all isomers); (Cyclohexane, 1,2,3,4,5,6-hexachloro-, (1α,2α,3β,4α,5α,6β)-)
108-31-6	Maleic anhydride (2,5-Furandione)
No applicable CAS number	Manganese Compounds
108-39-4	m-Cresol
No applicable CAS number	Mercury Compounds
67-56-1	Methanol

Chemical Abstracts Service Number (CAS)	**Substance Name**
90-94-8	Methanone, bis[4-(dimethylamino)phenyl]- ($C_{17}H_{20}N_2O$)
72-43-5	Methoxychlor (Benzene, 1,1'-(2,2,2-trichloroethylidene)bis[4-methoxy-)
74-83-9	Methyl bromide (Bromomethane)
74-87-3	Methyl chloride (Chloromethane)
71-55-6	Methyl chloroform (1,1,1-Trichloroethane)
78-93-3	Methyl ethyl ketone (2-Butanone)
60-34-4	Methyl hydrazine
74-88-4	Methyl iodide (Iodomethane)
108-10-1	Methyl isobutyl ketone (Hexone)- 2-Pentanone, 4-methyl-
624-83-9	Methyl isocyanate
80-62-6	Methyl methacrylate (2-Propenoic acid, 2-methyl-, methyl ester)
1634-04-4	Methyl tert butyl ether (Propane, 2-methoxy-2-methyl-)
75-09-2	Methylene chloride (Dichloromethane)
101-68-8	Methylene diphenyl diisocyanate (MDI); (Benzene, 1,1'-methylenebis[4-isocyanato-)
569-64-2	Methylium, [4-(dimethylamino)phenyl]bis[4-(ethylamino)-3-methylphenyl]-, acetate
108-38-3	m-Xylenes
121-69-7	N,N-Dimethylaniline (dimethyl-benzenamine)
91-20-3	Naphthalene
No applicable CAS number	Nickel Compounds
98-95-3	Nitrobenzene
59-89-2	N-Nitrosomorpholine
684-93-5	N-Nitroso-N-methylurea
No applicable CAS number	Nonylphenol and its ethoxylates
90-04-0	o-Anisidine
95-48-7	o-Cresol
95-53-4	o-Toluidine
95-47-6	o-Xylenes
56-38-2	Parathion
106-44-5	p-Cresol
82-68-8	Pentachloronitrobenzene (Quintobenzene)
87-86-5	Pentachlorophenol
108-95-2	Phenol
17540-75-9	Phenol, 2,6-bis(1,1-dimethylethyl)-4-(1-methylpropyl)-, which has the molecular formula $C_{18}H_{30}O$
75-44-5	Phosgene
7803-51-2	Phosphine
7723-14-0	Phosphorus
85-44-9	Phthalic anhydride
1336-36-3	Polychlorinated biphenyls (Aroclors)- (1,1'-Biphenyl, chloro derivs.)

Chemical Abstracts Service Number (CAS)	**Substance Name**
No applicable CAS number	Polycyclic Organic Matter, includes organic compounds with more than one benzene ring, and which have a boiling point greater than or equal to 100 ºC.
106-50-3	p-Phenylenediamine
123-38-6	Propionaldehyde
114-26-1	Propoxur (Baygon)
78-87-5	Propylene dichloride (1,2-Dichloropropane)
75-56-9	Propylene oxide
106-42-3	p-Xylenes
91-22-5	Quinoline
106-51-4	Quinone
No applicable CAS number	Refractory ceramic fibre
No applicable CAS number	Selenium Compounds
100-42-5	Styrene (Benzene, ethenyl-)
96-09-3	Styrene oxide (Oxirane, phenyl-)
1461-22-9	Tetrabutyltins ($(C_4H_9)_4Sn$)
127-18-4	Tetrachloroethylene
127-18-4	Tetrachloroethylene (Perchloroethylene)
7550-45-0	Titanium tetrachloride
108-88-3	Toluene (methyl benzene)
81741-28-8	Tributyltetradecylphosphonium chloride ($C_{26}H_{56}P•Cl$)
79-01-6	Trichloroethylene
121-44-8	Triethylamine
1582-09-8	Trifluralin (Benzenamine, 2,6-dinitro-N,N-dipropyl-4-(trifluoromethyl)-)
108-05-4	Vinyl acetate
593-60-2	Vinyl bromide
75-01-4	Vinyl chloride
75-35-4	Vinylidene chloride (1,1-Dichloroethylene)
1330-20-7	Xylenes (isomers and mixture)

NOTE: For all substances listed above which contain the word "compounds" after the name of a chemical (i.e., antimony, arsenic, etc.), and for glycol ethers, the following applies: Unless otherwise specified, these listings are defined as including any unique chemical substance that contains the named chemical (i.e., antimony, arsenic, etc.) as part of that chemical's infrastructure.

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Proposed Amendments to Air Quality Management Fees Bylaw

Engagement Summary

(June 2025 to March 2026)

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Proposed Amendments to Air Quality Management Fees Bylaw

Engagement Summary

Acknowledgements
Thank you to everyone who provided input on proposed amendments to *Metro Vancouver Regional District's Air Quality Management Fees Regulation Bylaw No. 1330, 2021 (Bylaw 1330)*. Metro Vancouver embraces collaboration and innovation to provide sustainable regional services, contributing to a livable and resilient region and a healthy natural environment for current and future generations. Metro Vancouver charges regulatory fees on authorized air emissions to recover regulatory program costs and encourage emission reductions. Potential amendments to this bylaw aim to provide clarity to permittees, balance cost recovery and environmental protection, consider affordability, and align with federal and provincial legislation. Potential amendments are being refined based on input from the engagement, research, alignment with leading jurisdictions, and consideration of current economic conditions. Feedback will help shape an effective and practical bylaw, helping to identify feasible solutions and reasonable regulatory fees.

About Metro Vancouver
Metro Vancouver is a diverse organization that plans for and delivers regional utility services, including water, sewers and wastewater treatment, and solid waste management. It also regulates air quality, plans for urban growth, manages a regional parks system, provides affordable housing, and serves as a regional federation. The organization is a federation of 21 municipalities, one electoral area, and one treaty First Nation located in the region of the same name. The organization is governed by a Board of Directors of elected officials from each member jurisdiction.

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March 2026
www.metrovancouver.org

This engagement report provides a summary of the engagement program for *Metro Vancouver Regional District's Air Quality Management Fees Regulation Bylaw No. 1330, 2021 (Bylaw 1330)* that took place between June 2025 and March 2026 to hear from interest holders including those likely to comment, be impacted, or have a role in implementation. This included regulated businesses, other governments, First Nations, member jurisdictions, health authorities, and residents that have indicated an interest in the management of air quality. The input provided valuable insights that staff have used to develop recommendations for decision makers.

About Bylaw 1330

Metro Vancouver protects air quality through emission regulations and site-specific authorizations (permits and approvals) to control the discharge of air contaminants. Metro Vancouver has charged fees for applications for authorization since 1973 and for authorized air emissions since 1992 to support the costs of delivering the air quality regulatory program and encourage emissions reduction. Bylaw 1330 establishes these fees.

The Metro Vancouver Board established its air quality management fees bylaw in 2008 (as *Greater Vancouver Regional District Air Quality Management Fees Regulation Bylaw No. 1083 (2008)*, or '*Bylaw 1083'*), and adopted a revised bylaw in 2021 (as *Metro Vancouver Regional District's Air Quality Management Fees Regulation Bylaw No. 1330, 2021 (Bylaw 1330)*. This is an important consideration for the engagement summary, as on both these occasions Metro Vancouver undertook engagement with interested parties.

Engagement on Bylaw 1330

In 2024, after three years of implementation of Bylaw 1330, staff, the regulated audience and others recognized a need for amendments to support competitiveness, clarity, and predictability of the fees, while encouraging emissions reduction through fees that are proportional to the quantity and impact of emissions. In April 2025, Metro Vancouver's Board directed staff to engage on potential amendments to the bylaw. Initially the proposed window for this engagement was June to August 2025. As the engagement proceeded staff responded by extending the timeline, adding additional engagement activities, and seeking further input from Metro Vancouver's Air Quality Committee.

In May 2025 staff came forward with these proposed amendments:

- Clarifying the calculation of emission fees for multi-category air contaminants
- Reducing fee rates for odorous air contaminants
- Reducing maximum fees for applications for authorization, and applying interest on overdue payments
- Updating definitions

Details on the May 2025 proposed amendments are described in a report to the Air Quality Committee dated May 15, 2025 titled, '*Proposed Amendments to Air Quality Management Fees: Initiating Engagement*'.

In January 2026, the proposed amendments were adjusted to:

- Update definitions
- Clarify ambiguities in how fees are calculated
- Simplifying and reducing fee rates for odorous air contaminants
- Introducing application fee caps
- Introducing interest on overdue payments

This January proposal was shared with interest holders for feedback. In January 2026, staff brought a report to the Air Quality Committee dated January 8, 2026, titled '*MVRD Air Quality Management Fees Regulation*

Amendment Bylaw No. 1440, 2026'. This report was referred back to staff with direction to better understand and consider input from staff at the Province.

Through listening to feedback on these early proposals, including further conversations with Provincial staff and representatives of some of the region's largest industrial facilities Metro Vancouver staff revisited the amendments and in April 2026 are recommending:

- Freeze fee rates at 2026 levels until late 2028, once the proposed updates described below have been incorporated;
- Cap permit application fees;
- Clarify and simplify the approach for odorous air contaminants and reduce some fee rates;
- Clarify definitions and align with provincial and federal legislation;
- Clarify fee calculations; and
- Include a provision to review fees by late 2028, and then every four years thereafter.

Details on the recommended amendments are described in a report to the Air Quality Committee dated March 24, 2026, titled, '*MVRD Air Quality Management Fees Regulation Amendment Bylaw No. 1440, 2026'*.

Executive Summary for the Engagement Program

Staff delivered an engagement program through 2025 and into 2026 to seek feedback on amendments to Metro Vancouver's air quality permit and regulatory fees. Staff engaged permit holders, member jurisdictions, health authorities, governments, First Nations as well as residents and community representatives who have indicated an interest in air quality management.

At the initiation of the engagement in June 2025, interested parties were provided with information and a suite of proposed amendments, and encouraged to provide feedback by August 1, 2025.

This timeframe was extended as the engagement proceeded and it was recognized that more time was required before an effective recommendation could be brought to Committee and Board. In particular, staff held further conversations with Provincial staff and representatives of some of the region's largest industrial facilities through fall and winter 2026. Staff also received additional input from Vancouver Coastal Health and residents in this time period.

About the Engagement Program

Staff delivered an engagement program June 2025 through to March 2026 to find a suite of amendments that are appropriately balanced and ensure the bylaw remained effective, where the purpose of this bylaw is to set the management fees to support air quality management in this region.

Invitation to Participate
To initiate the engagement, staff generated a web resource and highlighted opportunities for input. Information was distributed via direct correspondence, industry channels, and municipal networks. Staff invited feedback through webinars, feedback forms, presentations and correspondence. To better understand perspectives of holders of more complex permits staff hosted focused meetings, made phone calls and corresponded directly with these audiences. Additional conversations were convened among Metro Vancouver staff and staff from the Province, as well as representatives of some of the region's largest industrial facilities.

Hearing and Considering Feedback
Engagement comments, correspondence, survey responses, and meeting notes were documented, analyzed, and used to inform the proposed amendments for consideration by the MVRD Board.

The table below provides a summary of engagement activities.

Activity	Audience	Timing	Medium
Invitation to complete feedback forms, attend a webinar or meet directly with staff and provide feedback	Regulated community, including: • Permitted facilities • Industry representatives • Current permit applicants • Subset of facilities that are permitted to emit odorous air contaminants Member jurisdictions Interested public, including • Individuals with an interest in the odour and air quality management program • Individuals exploring how to file an air quality or odour complaint during the engagement • Individuals who have expressed interest in previous engagement	June 2025 – February 2026	Project and related Metro Vancouver webpages, emails, outgoing air quality permit invoices, SmellVan app webpage

Activity	Audience	Timing	Medium
Presentations to member jurisdictions and relevant committees	• Lower Fraser Valley Air Quality Coordinating Committee • Metro Vancouver Regional Engineers Advisory Committee (REAC) • City of Richmond Advisory Committee on the Environment • City of Coquitlam, Sustainability and Environmental Advisory Committee • Cement Association of Canada • Air Quality Health Coordination Committee • Agricultural Advisory Committee • British Columbia's Ministry of Environment and Parks and the Ministry of Jobs and Economic Growth	June 2025 – March 2026	Virtual and In-Person
Invitation to engage First Nations	First Nations: • q̓iċəy̓ (Katzie First Nation) • q̓ʷɑ:ṅƛ̓əṅ (Kwantlen First Nation) • kʷikʷəƛ̓əm (Kwikwetlem First Nation) • máthxwi (Matsqui First Nation) • xʷməθkʷəy̓əm (Musqueam Indian Band) • Semiahmoo First Nation • Sḵwx̱wú7mesh Úxwumixw (Squamish Nation) • scəẇaθən məsteyəxʷ (Tsawwassen First Nation) • səlilwətaɬ (Tsleil-Waututh Nation)	June 2025	Email
Invitation to engage provincial, federal, and other government agencies such as health authorities	Government agencies, including • BC Ministry of Environment and Parks • BC Ministry of Jobs, Economic Development and Innovation • BC Ministry of Agriculture • Vancouver Coastal Health • Fraser Health • Environment and Climate Change Canada • Health Canada • Vancouver Fraser Port Authority	June 2025 – March 2026	Email, direct meetings

Activity	Audience	Timing	Medium
Focused discussions to explore proposed amendments	Interest holders including those likely to comment, be impacted, or have a role in implementation	June 2025 - March 2026	Individual and small group discussions (in person, virtual, and by phone)
Additional engagement with permit holders	Additional conversations as the proposals evolved	June 2025 - March 2026	
Additional engagement with Province.	Metro Vancouver staff met with staff from the Province in person and by telephone	Fall 2025 – March 2026	

Engagement Promotion

The engagement was promoted on the Metro Vancouver website, direct email, invoices to permit holders, and industry networks. Industry associations assisted in distributing information directly to their members. External websites, such as the SmellVan app website, promoted the engagement to their visitors.

Website

During this engagement, there were over 400 project webpage views.

E-mails

The engagement was promoted to member jurisdictions, relevant databases including those subscribed to hear about odour management and air quality management fees, as well as all including permit holders and applicants.

Direct outreach

Throughout the engagement period Metro Vancouver staff connected directly with interest holders. This was to respond to queries, seek clarification on feedback, and request further dialogue.

Engagement Participation

Webinars
Two webinars were held on June 25 (30 registrants) and July 9, 2025 (27 registrants), to provide information, respond to questions, and hear feedback. Registrants included current air quality permit holders; businesses applying for an air quality permit; public health authority; provincial government; port authority; municipal governments; First Nations; consultants representing the regulated community; non-government environmental stewardship organizations; and public resident participants.

Focused Discussions (Individual and Small Group)
Staff engaged individuals and small groups in phone, virtual, and in-person discussions answering questions and seeking feedback about the proposed amendments.

Presentations to Member Jurisdictions and Committees
Metro Vancouver staff attended municipal environment advisory committees to present and hear feedback on the proposed amendments to Metro Vancouver's air quality management fees regulation bylaw.

Feedback Form Responses
An online questionnaire was open June through August 2025. This was an opt-in survey promoted to those likely to comment, be impacted or have a role in implementation. There were 82 responses. Participants identified 15 municipalities as their base. 70% of respondents identified as a resident and 13% as a business. There were multiple choice questions and room for comments.

Incoming Correspondence
Staff received 23 letters and emails by March 31, 2026, including three from the Province.

What We Heard

Correspondence
The following provides highlights of the feedback by audience:

Provincial staff

- Appreciation of the ongoing consultation process
- Agreement that odour is a public concern
- Strong support for environmental protection as a core objective of the bylaw, balanced with concern for other critical priorities (specifically affordability)
- Specific interest in some of the proposed amendments; pace of discharge fee rate increases, alignment with provincial and interprovincial benchmarks (discharge fees and permit application/ reapplication fees), complexity of Schedule B in Metro Vancouver's bylaw (array of compounds)
- In addition to staff-to-staff conversations, staff from the Province submitted letters to Metro Vancouver: Ministry of Jobs and Economic Growth, Ministry of Environment and Parks, and Ministry of Agriculture and Food on July 29, 2025, December 1, 2025, and January 30, 2026

Health Authorities

- Identified the health impacts of odours on residents (individual well-being, mental health, quality of life)
- Shared reported behaviour changes related to odour (reduced use of outdoor spaces, avoiding outdoor walking and active transportation, barriers to opening windows for cooling)
- Recommendations to
    - consider the burden of odours on health and well-being of communities
    - maintain robust monitoring and enforcement
    - integrate community sourced data into air quality monitoring
    - structure the air quality fee system to incentivize emissions reductions
- In addition to staff-to-staff conversations, staff from two health authorities submitted letters to Metro Vancouver: Vancouver Coastal Health, October 22, 2025, and Fraser Health Authority, January 12, 2026.

Representatives from large industrial interests (typically operating with a distinct permit), including the Cement Association of Canada representing two facilities in this region

- General acknowledgement of the purpose of air quality management and interest in participating in this consultation (alignment with corporate commitments, support for the user-pay principle)
- Direct costs (scaling fees to impacts of emissions, cost transparency, predictability of fees, concerns for the initially proposed fee caps, costs to meet permit requirements)
- Fairness (benchmarking with other jurisdictions, competitiveness, weight on specific sectors, permit terms)
- Complexity (in measurement of odorous air contaminants)
- Transparency (clarity on annual costs and direct relation to cost recovery and emissions abatement)
- Managing air quality with respect to other regional priorities (investment, employment, productivity)
- In addition to staff-to-staff conversations, these interest holders submitted letters to Metro Vancouver: Cement Association of Canada, October 23, 2025 and January 8, 2026; a joint submission from industry (7 signatories), October 20, 2025; and additional letters from individual regulated businesses.

Representatives from smaller entities

- Less feedback than the larger permit holders
- Staff estimated less concern as these businesses largely operate within the bylaw regulation

Residents

- Considerations for human health and the environment
- Identification of health impacts from odours, including experiences in specific neighbourhoods
- Interest in understanding the tools available to local governments to manage odour impacts in residential communities
- Perspectives from residents from additional feedback mechanisms including
    - In 2020, Metro Vancouver undertook public research with two core findings:
        - majority of respondents (80%) believed that businesses emitting pollutants should pay costs for regulating those emissions.
        - majority (92%) felt that fees should be scaled in accordance with the amount and degree of harm of the pollutants discharged
    - Residents make average 2000 calls with air quality complaints per year, the majority for odour
    - Non-government platforms such as Smell Vancouver track odour reports from residents, and the resulting behaviour (e.g. went inside, closed windows, stopped exercise)

Feedback Forms

The following captures responses to the feedback form, June to August 2025.

- Most respondents (67%) affirmed that the proposed bylaw amendments align with Metro Vancouver's responsibility for managing air quality in the region (23% of respondents were unsure).
- Most respondents (58%) agreed with applying the highest applicable emission fee rate when an air contaminant falls into multiple categories to reflect the air contaminant's effects on health and the environment.
- Responses were evenly mixed regarding reducing emission fee rates for specified odorous air contaminants. Some respondents noted this will reduce the incentive for emissions reductions. Others noted concern about the bylaw's financial impact on local industry.
- Regarding limiting the application fee for permits, approvals, and amendments to a $450,000 maximum, 39% of respondents noted negative impacts vs. 27% of respondents noting this as an improvement. Respondent comments related to the fee cap expressed concern about how the proposed maximum fee amount would relate to Metro Vancouver's cost recovery or how a fee cap would benefit the largest emitters. [Metro Vancouver staff note this cap is revised in response to the engagement input.]
- Most respondents (66%) agreed that charging interest on overdue payments would be an improvement.

Open comments in the feedback forms include costs for authorized industry emissions, impacts of air emissions to the environment, public health and well-being, and a shared desire to reduce emissions while considering costs and benefits to society, taxpayers, business, and local economies. Respondents noted the importance of using scientific data, clear and transparent calculations, and strong enforcement and compliance.

The following captures comments received through the questionnaire and correspondence to the project team:

Theme	Feedback
Impacts of emissions, including scaling to fees	General agreement with cost recovery and discharger-pay principles. General agreement that emission fee rates should be scaled by an air contaminant's effects on health and the environment. Odours have impact on local communities and the well-being of people nearby (stay inside, close windows, disrupt work, or use air purifiers). Provided examples of neighbourhoods strongly impacted by odours. Concern about inconsistent [over] scaling of fees with health impacts. Questioned the data-supported link between health impacts and odour. Questioned how proposed odorous air contaminant fees could be consistently scaled with health impacts like other air contaminants. Concern that any fee cap would reduce the incentive to invest in emissions reduction technology or measures. Suggestion to consider time duration of emissions regarding detrimental effects of short vs. long-term exposure.
Cost	Suggestion that regulatory costs, measurement and tracking costs, and related calculations should be clear to the regulated community, bylaw approval decision makers, and the public. Question whether legal costs are, or should be, included in figures Metro Vancouver is seeking to recover through fee revenues. Suggestion that regulatory costs could be decreased through program efficiency. Demonstrated emissions reductions should link to fee reductions. Suggestion that enforcement costs borne by Metro Vancouver are tracked, calculated, and available. Concern about the initially proposed $450,000 amount as a fee cap [Metro Vancouver staff note this was an initial proposal and was later reduced]. Suggestion of lack of fairness of others subsidizing the regulatory costs caused by the region's largest emitters. Concern that term limits for permits were unclearly established on a case-by-case basis, creating uncertainty and unfairness for large facilities.

	Concern that measurements such as odorous air contaminants have the potential to impose significant costs on both the regulated industry (sampling and analysis) and the regulator (specification of methods, verification of results). Suggestion that the costs to administer align with cost recovery. Concern with charging fees based on measured odours, where measurements can vary. Makes fees volatile, affects stability of business, raises questions about accuracy, and risks disputes.
Efficiency	Comment that charging fees does not guarantee compliance with regulations or reduction of air contaminants. Query whether monetary penalties efficiently and effectively change behaviour rather than adding to costs.
Predictability of fees	Comment that a clear and predictable regulatory environment is important for businesses to operate and calculate year-to-year costs. Ask to clarify how fee rates are projected to increase over time. Comment that fees are complex and not easily understood and they are not adequately predictable. Comment on the difficulty in estimating future permit fees. Comment that businesses should be able to understand and predict new and incremental cost increases; both application and permitting costs.
Competitiveness / benchmarking	Comment that costs to remain compliant in Metro Vancouver's air quality jurisdiction remain consistent with other Canadian jurisdictions and across North America. Comment that Metro Vancouver fees are among the highest they (permit holder operating in multiple jurisdictions) pay in North America. Comment that maintaining globally competitive air permitting costs and processes supports the region being more attractive to businesses seeking to locate or expand manufacturing operations in key industrial and economic sectors. Suggestion that an amended bylaw could be informed by an analysis that benchmarks fees against similar jurisdictions. Comments that Metro Vancouver is seen as a high-cost jurisdiction facing competitive pressure from less sustainable imports.

	Comment that increasing regulatory pressure and costs risk further displacement of economic investment, local production, and jobs. Regarding interest on overdue invoices after 30 days, suggestion that 45 days or 90 days was common practice.
Unintended consequences	Comment that increased regulatory and permitting costs can be passed down the supply chain, impacting affordability. Comment that Metro Vancouver and its member jurisdictions are direct customers of some permit holders and increased fees could translate into higher costs. Comment that the costs of the regulatory program should not become a barrier to new industries or an incentive for existing industry to relocate. Comment that some sectors are sensitive to compliance costs and international market access, such as manufacturing, clean technology, and agrifood manufacturing. Health authority staff were concerned that fewer permit applications would be reviewed by health authorities because of a fee reduction without a reduction in impact. Since a permit fee threshold is one of the criteria that triggers health authority review and dispersion modelling, reduced fee rates might reduce the number of permit applications that cross the permit fee threshold for undergoing a review by health authorities.
Incentives to reduce emissions	Comment that an amended bylaw must maintain consistent pressure on emitters to reduce their air quality impacts. Suggestion to consider fee discount incentives if air contaminants are demonstrably reduced below emission limits, such as 80%, 60%, 40%, 30%, and 20% of limits.
Complexity / clarity	Comment on costs for permittees. For example, expenses to interpret the bylaw and anticipate future fees, and engaging consultants and legal counsel to navigate the complexities. Suggestion to simplify and clarify step-by-step calculations wherever possible. Suggestion that definitions for substance categories be transparent and unambiguous. Suggestion to adopt an amended definition of odorous air contaminants that can be used to determine whether a substance is a member of this class or not. Suggestion to clearly state that fees for each air contaminant will only be charged once at one fee rate per emissions source.

	Suggestion to establish clear rules on which fee rates apply to air contaminants that belong to multiple categories. Suggestion that fee structure review timelines outline when Metro Vancouver intends to reevaluate and adjust the bylaw [in future]. Suggestion permit time lengths be clear and consistent.
Odorous air contaminants	Suggestion that Metro Vancouver consider removing odorous air contaminants (Schedule B in MVRD Bylaw No. 1330, 2021). Suggestion to remove all reference to odorous air contaminants, odour detection thresholds and odour units. Comment that odour units are subjective and inaccurate for use as a permit compliance measurement or fee mechanism. Suggestion to devise a method of apportioning reasonable and transparent administrative costs related to odorous emissions between the respective permit holders that uses accepted mainstream methods to measure standard air emission parameters such as Total Reduced Sulphur (TRS) and/or Total Volatile Organic Compounds (VOCs). Since nearly all odorous air contaminants are either Total Reduced Sulphur (TRS) or VOCs, cost recovery for the regulation of odorous air contaminants could be based on fees for these substances, creating a simpler, lower cost fees system. Comment that if measured emissions are below detection limits (lowest concentration at which the human nose can first detect a smell) they should not be charged a fee. Concern about referencing older studies (Nagata, 2003 based on data from the 1970s and 1980s; shifting away from European standard).
Balancing regional goals	Suggestion to consider relative impacts of air quality management on other regional goals such as economic prosperity and affordability. Suggestion to support hard-to-abate industries to reduce emissions through other ways (beyond fees) included grants or cost-sharing arrangements to pilot better technologies. Emphasis on the direct impacts from odorous air contaminants on wellbeing and quality of life of residents.
Exemptions	Suggestion that Metro Vancouver consider and clearly state any bylaw exemptions, such as for farming activities related to agricultural crops or products.

First Nations Engagement

First Nations in the region were invited to provide feedback on these proposed bylaw amendments. One First Nation joined a webinar and three submitted a response. No concerns were expressed by any First Nations.

How Feedback Will Be Used

Feedback gathered through this engagement process helps to refine proposed amendments to shape an effective, clear, and practical bylaw to encourage emission reductions and recover regulatory program costs. Input from the engagement will be considered alongside best practices research, insights from previous experience in enforcement of Bylaw 1330, and alignment with federal and provincial legislation. Staff will present refined proposed amendments, together with a summary of input and how it was considered, to the MVRD Board.

Appendix 1:
Correspondence between Metro Vancouver and the Province of British Columbia

Province of British Columbia

- Ministry of Jobs and Economic Growth, Ministry of Environment and Parks, and Ministry of Agriculture and Food - July 29, 2025
- Ministry of Jobs and Economic Growth, Ministry of Environment and Parks, and Ministry of Agriculture and Food - December 1, 2025
- Ministry of Jobs and Economic Growth, Ministry of Environment and Parks, and Ministry of Agriculture and Food - January 30, 2026

Metro Vancouver

- Response to July 29, 2025 Letter Regarding Metro Vancouver Regional District Air Quality Management Fees Regulation Bylaw No 1330, 2021 - August 27, 2025
- Update on Proposed Amendments to Metro Vancouver Regional District Air Quality Management Fees Regulation Bylaw No 1330, 2021 - December 4, 2025
- Response to January 30, 2026 Letter Regarding Metro Vancouver Regional District Air Quality Management Fees Regulation Amendment Bylaw No. 1440, 2026 (Air Quality Management Fees Regulation Bylaw No. 1330, 2021) - February 12, 2026

Letters have been appended in chronological order.

Reference: JEG 168873 / ENV 416571 / AF 242147

July 29, 2025

Jerry Dobrovolny
Commissioner/Chief Administrative Officer
Metro Vancouver Regional District
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Sent via email: jerry.dobrovolny@metrovancouver.org

Government of British Columbia: Ministries of Jobs and Economic Growth; Environment and Parks; and Agriculture and Food

Comments on Proposed Amendments to Metro Vancouver Air Quality Management Fees Bylaw No. 1330, 2021

Introduction

At its regular May 23, 2025, meeting the Metro Vancouver Regional District Board (Metro Vancouver) of Directors passed a resolution directing staff to engage with interest holders on proposed amendments related to fees in Metro Vancouver *Bylaw No. 1330, 2021* (the *Bylaw)*.

In line with this directive, Metro Vancouver has engaged the Government of B.C. on a discussion paper: "*Proposed Amendments to Air Quality Management Fees: Initiating Engagement*." The following submission to Metro Vancouver represents insights and perspectives from the B.C. Ministries of Jobs and Economic Growth, Environment and Parks, and Agriculture and Food.

Metro Vancouver Air Permitting

In B.C., authority to control and prevent the discharge of air contaminants has been delegated to Metro Vancouver under the B.C. *Environmental Management Act* and previous enactments. Efforts to enhance regulatory clarity and B.C.'s economic competitiveness acknowledge and work within this framework. Alignment between provincial environmental and business objectives, and Metro Vancouver's air quality bylaws and related processes, is essential to maintaining B.C.'s competitiveness relative to other Canadian jurisdictions and across North America.

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The **B.C. Ministry of Jobs and Economic Growth** recognizes the evolving global economic landscape, including the resurgence of protectionist measures such as U.S. tariffs and shifting trade dynamics. It is, therefore, critical for B.C. and Canada to foster a resilient and competitive business environment. A strong, coordinated regulatory and economic framework across jurisdictions enhances investor confidence and supports domestic industries in adapting to international pressures.

In this context, Metro Vancouver's air permitting regime plays a pivotal role. By aligning local regulatory practices with broader provincial and national economic objectives, B.C. can ensure that its businesses remain competitive and attractive to Canadian and global investment. This alignment is particularly critical for sectors that are sensitive to compliance costs and international market access, such as manufacturing, clean technology and agrifood manufacturing, among others.

At the local government level, a transparent, competitive and predictable air permitting regulatory framework has a direct and significant impact on compliance costs for businesses. Most jurisdictions in advanced economies, including B.C. and Metro Vancouver, require businesses to obtain air permits for various industrial processes that emit air pollutants. In Metro Vancouver's case these permits come with application fees, annual administrative fees, and emission fees based on the type and quantity of pollutants discharged.

When regulations, including environmental quality regulations, are clear, predictable and consistently applied, businesses can accurately forecast their permitting costs. This allows them to effectively budget for application fees, annual maintenance fees, and, critically, the emission fees which can depend on authorized discharge levels. Without such transparency, businesses face the uncertainty of fluctuating or unexpectedly high fees, leading to financial instability and a reluctance to invest in new projects or expand existing operations that might require new or amended discharge permits. Moreover, a predictable framework enables companies to make informed decisions about installing emission control equipment or modifying processes to reduce their pollutant output, knowing that these investments will directly translate into lower, predictable emission fees rather than an unpredictable administrative burden.

Conversely, an opaque permitting system can result in substantial hidden costs for permittees. Businesses may incur significant expenses trying to interpret vague bylaws or regulations or anticipate future fee structures. This often involves engaging costly consultants and legal counsel to navigate the complexities, diverting resources from core business activities. Furthermore, if the process for obtaining or renewing permits is unpredictable, delays can lead to operational shutdowns, lost production, and missed market opportunities—all of which represent significant financial losses.

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To achieve global competitiveness, a transparent and predictable regulatory framework is not merely beneficial; it is essential. In today's interconnected world, businesses and investors have a choice of where to locate operations and deploy capital. Jurisdictions that offer clear, consistent and stable regulatory environments stand out as attractive destinations, directly enhancing their national and global competitiveness. To be globally competitive, jurisdictions such as B.C. and Metro Vancouver must constantly benchmark their regulatory frameworks, including air permitting, against national and international best business and environmental practices. This means ensuring that regulations or bylaws effectively achieve environmental goals while recovering administrative costs proportionate to efficient program delivery.

Maintaining globally competitive air permitting costs and processes will help make the region more attractive to businesses seeking to locate or expand manufacturing operations in key industrial and economic sectors, including agrifood, among others.

Regulatory Considerations for the Agrifood Manufacturing Sector
For the B.C. agrifood sector, including manufacturers in Metro Vancouver, the importance of a clear and predictable regulatory environment is vital. Food and beverage manufacturers and companies that directly support them in their critical supply chains often operate on tight margins and are sensitive to regulatory, administrative and permitting cost requirements. These businesses are found across the entire agrifood production spectrum from food processors to agrifood exporters, many of whom rely on timely approvals and cost certainty to meet seasonal production cycles and market demands.

The **B.C. Ministry of Agriculture and Food** works to ensure that B.C.’s agrifood sector remains sustainable and is both nationally and globally competitive by advocating for regulatory approaches that are proportionate, transparent and aligned with the realities of its unique agrifood operations. This includes ensuring that regulatory approaches including compliance requirements reflect the scale and environmental impact of operations, and do not impose undue burdens and fees on small and medium-sized enterprises. Ultimately, increased regulatory and permitting costs can be passed down the supply chain, potentially impacting the affordability of food for households that rely on accessible and reasonably priced B.C. agrifood products.

A well-calibrated permitting system can support innovation and environmental stewardship in the agrifood manufacturing sector by encouraging investment in clean technologies and process improvements. When businesses are confident that such investments will lead to predictable and fair regulatory outcomes and permit fees, they are more likely to adopt sustainable practices that align with local and provincial climate and environmental goals.

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A balanced and coordinated regulatory framework—one that supports both environmental protection and economic viability—is essential to the long-term success of B.C.'s agrifood sector across the entire supply chain in an increasingly competitive global marketplace. These principles are equally relevant across all of B.C.'s economic sectors and should guide the development and refinement of Metro Vancouver's air permitting framework.

Building on this perspective, the **B.C. Ministry of Environment and Parks** offers the following technical observations and recommendations regarding specific provisions of the *Bylaw*.

1. **Benchmarking fees relative to other jurisdictions**

In common with Metro Vancouver, many jurisdictions charge fees for regulatory services such as reviewing applications for permits and annual fees for active permits. Usually, the aim is for fees to recover all or portion of the costs of the regulatory program, under the view that polluters should pay the costs of the programs needed to manage pollution (i.e., polluter pays). While endorsing the principle of polluter pays, caution is needed to ensure that the costs of the regulatory program do not increase to the point that fees become a barrier to new industries or an incentive for existing industry to relocate.

The Province recommends that the Board's decision on an amended *Bylaw* should be informed by an analysis that benchmarks MVRD fees against comparable regulatory costs in a range of similar jurisdictions.

While this benchmarking will provide useful context, it is important to note that different jurisdictions may have different goals with respect to cost recovery; and factors such as population and complexity of emissions sources, and the impact on human health and the environment, will also affect the cost of the overall regulatory framework.

2. **Measured increases in fee rates**

While fee rates are likely to increase over time reflecting both the cost of regulatory programs and the public's increasing expectations for excellent air quality, it is also important that fee increases are measured and phased where possible to allow regulated entities time to adapt.

The Province recommends that the Board's decision on an amended *Bylaw* should be informed by an analysis that shows how fee rates are projected to increase from 2020 (before the current bylaw was enacted) through to the last year where fee rate increases are specified in the *Bylaw*. Fee rates for newly added pollutants that were not charged before 2021 should also be highlighted in this analysis.

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3. Transparency and predictability of fees

Existing businesses and potential new entrants will want to be able to understand and predict new and incremental cost increases. Existing businesses need to be able to predict their costs, while potential new businesses need to understand approximate application and permitting costs. Informed permittees should be able to calculate fees based on the scheduled fee rates in the *Bylaw* and their authorized emissions and come to the same answer as Metro Vancouver staff. At the same time, staff should not be required to make statutory decisions in determining fees.

The Province recommends that *Bylaw* amendments carefully consider eliminating sources of ambiguity and interpretation in the existing *Bylaw*.

Specific suggestions to address ambiguity and unclear interpretation are included in the section below.

a. Statutory decisions

Several sections of the current *Bylaw* provide options for charging fees. For instance, fees can be charged on the quantity of measured emissions or the quantity of authorized emissions. In some cases, the *Bylaw* provides a scheme to determine which methodology is used for a given case. However, in other cases such as the definition of an "authorized discharge" and Schedule B, the *Bylaw* does not provide clear instructions on which fee method prevails. Therefore, in arriving at a final fee amount, Metro Vancouver staff must exercise their discretion on which methodology to use. This exercise of discretion is not explicitly authorized by the current *Bylaw* and has the effect of decreasing predictability of fees. In addition, if this exercise of discretion is found to be a statutory decision, then fees based on that statutory decision could be appealable.

The Province suggests that amendments to the *Bylaw* should clarify which fee methodology prevails in each circumstance, eliminating any statutory decisions from the Bylaw.

b. Definition of substance categories

There is significant ambiguity and overlap between the pollutant categories defined within the fees *Bylaw*. For example, volatile organic compounds (VOC) can also be odorous air contaminants (OAC) or hazardous air pollutants (HAP). Some specific identified issues include:

- The definition of "photoreactive volatile organic compounds" encompasses "any organic compound". By referencing "any organic compound" with no reference to the volatility of the compound, this definition is far broader than most regulatory definitions. This definition has implications on the definition of hazardous air pollutants since that definition excludes VOC.

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- The definition of HAPs refers to and adopts schedule 1 of the *Canadian Environmental Protection Act* (CEPA) 1999 which is not a list of HAPs, although it does include some compounds broadly considered to be HAPs. However, the definition removes VOCs from the CEPA 1999 list, thereby eliminating some substances which are widely viewed as HAPs.

The Province suggests that definitions for each of the substance categories be carefully reviewed and amended as needed to provide transparent, unambiguous definitions. Referencing lists of compounds maintained by other jurisdictions should be applied with caution, particularly in cases where the list was never intended to be a list of hazardous air pollutants.

c. Fee rates for pollutants that belong to multiple categories

The *Bylaw* is silent on which fee rates apply if a pollutant belongs to multiple pollutant categories and does not rule out being charged twice for the same air contaminant (although this has not happened in practice).

The Province recommends that the *Bylaw* be amended to clearly state that fees for each pollutant will only be charged once at one fee rate per emissions source and to establish clear rules on which fee rates apply to pollutants that belong to multiple categories.

d. Guidance on fee calculations

With an updated *Bylaw* that removes ambiguity and the need for discretionary decision making by the regulator, it should be possible to provide guidance on how the fees are applied in practice, including detailed example calculations. Such guidance would allow industries to more accurately predict their future permit and application fees.

The Province recommends that to accompany an amended *Bylaw*, Metro Vancouver staff should develop guidance with examples of the fee calculations contained in the *Bylaw*.

4. Complex provisions around odorous air contaminants

The primary harms of air pollution relate to the health and environmental harms caused by common pollutants such as fine particulate matter, ozone and their precursor pollutants. However, odorous compounds, or odorous air contaminants (OACs) as they are called in the *Bylaw*, can drive a great deal of public concern and complaints as they are easily perceived and can cause an immediate impact on quality of life. Minimizing emissions of OACs through measures such as best available control technology, best management practices, regular maintenance and inspection, and odour complaint protocols is an important component of air quality management. Schedule B of the *Bylaw* attempts to recover some of the regulatory costs of managing OACs by adding discharge fees for emissions of OACs on top of fees for other air contaminant discharges. In a May 23, 2025, update to the Board, the target for cost recovery for OACs is shown as a range from $125,000 to $300,000.

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The Province has reviewed Schedule B of the current *Bylaw* and has identified the following concerns:

- Fee rates for OACs are ten to 1,000 times higher than fees on important health-impacting pollutants. For example, fine particulate matter, the pollutant most responsible for population health impacts in Canada and B.C., has a 2025 fee rate of $1,157/tonne, while the fee rate for hydrogen sulphide is 90 times greater. Also, facilities that have been billed for emissions of Total Reduced Sulphur compounds (TRS) will likely experience a greater than 100-fold increase in fees for those contaminants once they are billed for the individual constituents of TRS under Schedule B. Fee rates for odorous air contaminants range up to $1,000,000 per tonne.
- The definition of OACs is so general that it provides little certainty whether a given substance would be considered an OAC or not, beyond the 90+ substances that are specifically listed in Table 9 of Schedule B. With such a general definition there will be a requirement for Metro Vancouver staff to decide which compounds are odorous air contaminants on a case-by-case basis. These decisions will impact fees but will not be known ahead of time by permittees.
- Unlike for common air contaminants, proponents of projects will have little visibility to understand future permit fees as these fees can be dependent on monitoring requirements that may be included in the final permit but are not known at time of application.
- There is no certainty whether fees will be based on authorized discharges or measured concentrations as the *Bylaw* allows either but does not provide a definite method for choosing between them.
- Fees would be assessed based on undetectable concentrations of OACs according to Section 5 of Schedule B. In this section there is provision for assessing fees based on an assumed concentration of 0.25X the detection limit when a substance is measured but not detected. While assuming concentrations below a detection limit is a valid statistical procedure, it may not be a valid method on which to assess fees.
- The potential requirement for measurements of many uncommonly measured substances, either those listed in Schedule B, Table 9 or other odorous air contaminants, means that the *Bylaw* for odorous air contaminants has the potential to impose significant costs on both the regulated industry (sampling and analysis) and the regulator (specification of methods, verification of results).

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Considering the complexity and potential costs of Schedule B and the modest cost recovery planned for OACs, the Province suggests that Metro Vancouver should consider removing Schedule B from the amended *Bylaw*.

Since nearly all OACs are either TRS or VOCs, cost recovery for the regulation of OACs could be based on fees for these substances, creating a simpler, lower cost fees system. Bearing in mind that significant fee rate increases are already included in Schedule A from 2021 through 2028, the need for additional cost recovery could be evaluated once the already scheduled fee rate increases have been implemented.

If MVRD elects to keep Schedule B in the amended *Bylaw*, then the Province recommends the following changes:

1. Reduce fee rates for listed and unlisted air OACs to align with updated cost recovery objectives.
2. Adopt an amended definition of OACs that can be used to unambiguously determine whether a substance is a member of this class or not.
3. Specify a clear method to determine whether fees will be based on authorized or measured emissions.
4. Ensure that broadly accepted measurement methods meeting Metro Vancouver's requirements for accuracy and detection limit are specified for any substances that are required to be monitored.
5. Amend Section 5 so emission fees are no longer assessed for OACs that are not detectable in measurements.

Thank you for the opportunity to provide provincial perspective on amendments to this important bylaw.

Sincerely,

Fazil Mihlar
Deputy Minister
Ministry of Jobs and Economic Growth

Kevin Jardine
Deputy Minister
Ministry of Environment and Parks

Michelle Koski
Deputy Minister
Ministry of Agriculture and Food

cc: Conor Reynolds, Director, Air Quality & Climate Action Services, Metro Vancouver Regional District

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AUG 27 2025

File: CR-24-01-016

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Michelle Koski, Deputy Minister
Ministry of Agriculture and Food
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Dear Deputy Minister Jardine, Deputy Minister Koski, and Deputy Minister Mihlar;

Response to July 29, 2025, Letter Regarding Metro Vancouver Regional District *Air Quality Management Fees Regulation Bylaw No. 1330, 2021*

Thank you for your joint July 29, 2025 correspondence providing feedback on proposed amendments for the Metro Vancouver Regional District (MVRD) *Air Quality Management Fees Regulation Bylaw No. 1330, 2021* ("Bylaw 1330"). We appreciate your input on a range of critical economic and business considerations, as well as the technical aspects of the bylaw. Metro Vancouver staff have reviewed the recommendations and confirmed they are well aligned with the proposed amendments to Bylaw 1330 as outlined in the May 2025 Discussion Paper.

The current review of Bylaw 1330 reflects Metro Vancouver's ongoing commitment to continuous improvement, balancing environmental protection with economic considerations, and maintaining a regulatory framework that is effective, equitable, and responsive to evolving needs. Proposed changes to Bylaw 1330 aim to improve fairness, transparency, predictability, and ease of use, while continuing to protect regional air quality and maintaining discharger-pay and cost-recovery principles.

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Specifically, the amended Bylaw 1330 will have:

- Improved clarity on how fees apply when an air contaminant belongs to more than one category.
- Simplified key definitions to avoid overlaps and improve consistency with both federal and provincial frameworks.
- A cap on application fees so applicants have an upper bound for planning purposes.
- Substantially reduced fee rates for odorous air contaminants, as compared to the current fee schedule.
- Phased-in fee rate changes through 2030 to provide a clearer view of costs over time.

To support implementation of the amended Bylaw 1330, Metro Vancouver staff are also developing guidelines on fee calculation methodology and will work with individual permit holders to provide them with information needed for business planning and decision making.

Since June 2025, Metro Vancouver has conducted extensive engagement with permit holders, industry associations, member jurisdictions, and partner agencies, including health authorities and other governments. The feedback received through the engagement will be incorporated into the final amendments to be presented to the MVRD Board for consideration, currently targeted for November 2025.

We will continue to work collaboratively with the provincial government to ensure that the updated Bylaw 1330 supports our shared vision for this region: protecting air quality, supporting public health, recovering regulatory costs fairly, and fostering a competitive business environment.

Thank you again for your constructive input. We look forward to continued dialogue as we move toward finalizing these changes. If you have any questions, please contact Esther Bérubé, Division Manager, Air Quality Bylaw and Regulation Development by email at esther.berube@metrovancouver.org.

Yours sincerely,

Jerry W. Dobrovolny, P.Eng., MBA
Commissioner/Chief Administrative Officer

JWD/HM/mr

cc: Markus Kellerhals, Director, Core Programs Office, Ministry of Environment and Parks
Richard Sawchuk, Executive Project Director, Ministry of Jobs and Economic Growth
Heather McNell, Deputy Chief Administrative Officer, Policy and Planning, Metro Vancouver
Conor Reynolds, Director, Air Quality and Climate Action Services, Metro Vancouver
Esther Bérubé, Division Manager, Air Quality Bylaw and Regulation Development, Metro Vancouver

Encl: Correspondence dated July 29, 2025, re: "Government of British Columbia: Ministries of Jobs and Economic Growth; Environment and Parks; and Agriculture and Food - Comments on Proposed Amendments to Metro Vancouver Air Quality Management Fees Bylaw No. 1330, 2021".

Proposed Amendments to Metro Vancouver's Air Quality Management Fees Regulation Bylaw No. 1330 - Discussion Paper - May 2025

Reference: JEG 169886 / ENV 418444 / AF 286781

December 1, 2025

Jerry Dobrovolny
Commissioner/Chief Administrative Officer
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Government of British Columbia: Ministries of Jobs and Economic Growth; Environment and Parks; and Agriculture and Food

RE: Air Quality Management Fees Bylaw No. 1330, 2021 (Bylaw)

Further to our letter of July 29, 2025, providing input into MVRD's consultations on *Bylaw 1330, 2021*, we understand that Bylaw revisions are expected to be considered by the MVRD Air Quality and Climate Committee in January 2026. Our ministries appreciate MVRD's ongoing consultations on the Bylaw and reaffirm the following key points—which we believe are critical to achieving strong environmental protection while enhancing British Columbia's (B.C.) economic competitiveness and affordability through effective regulation.

1. Escalating Air Emissions Fees.
We support the principle of cost recovery to fund environmental programs. However, we remain concerned by the large increases proposed for MVRD discharge fee rates—ranging from approximately 27 percent to 72 percent between 2025 and 2028. These fee rate increases come at a time of global economic uncertainty, with many sectors facing inflationary pressures, supply chain disruptions, and tightening capital markets. Moreover, these proposed increases would be on top of recent MVRD increases in fee rates for key air pollutants of between 20 percent and 400 percent for key pollutants between 2020 and 2025. Current MVRD discharge fee rates range from 2 to 145 times greater than equivalent B.C. fees, depending on the pollutant. The impact of these discharge fees is that permit costs in MVRD are significantly higher than other Canadian jurisdictions. While environmental protection remains a priority, fee structures that are out of alignment with provincial and interprovincial benchmarks can have unintended consequences, including inflationary pressures in sectors such as housing and agrifood that are directly affected by this Bylaw.

We recommend pausing the proposed fee increases to ensure environmental and cost recovery objectives are met without eroding regional competitiveness or affordability.

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2. High Air Permit Application/Reapplication Fees
The permit application and permit reapplication fees—proposed to be capped at $250,000 for new permits and $125,000 for reapplications—are substantially above provincial and neighbouring jurisdictional benchmarks. While we acknowledge that this cap is a substantial reduction from the current Bylaw, these fees remain high in comparison to many jurisdictions. These fees should be structured to align with the principle of cost recovery, yet that alignment appears unclear based on the proposed caps. While B.C. provincial permits do not normally expire, MVRD has put expiry dates on most recent permits. When permits expire regularly the reapplication fees and associated costs of application such as air dispersion modelling become recurring costs for industry. While term-limited permits can be a tool to drive continuous improvement, the combined impact of short permit terms and high reapplication fees escalates the total cost of the regulatory framework.

While the Province has proposed to increase *Environmental Management Act* (EMA) permit application fees, even the increased fees are significantly lower than those proposed by MVRD, especially considering provincial permits include all discharges while MVRD permits only authorize air emissions. Under the Province's proposal, most facilities would pay $1,250 or $2,500 for EMA permit applications.

We recommend that MVRD further review the proposed air permit application and reapplication/renewal fees to ensure consistency with transparent cost recovery principles and with provincial and interprovincial benchmarks.

3. Odorous Air Contaminants (OACs) and Schedule B
We agree that odour is a public concern and support odour management. While we acknowledge both the effort to reduce the number of substances listed in Schedule B, and the proposed reduction of fee rates from the $1,000,000 per tonne rate in the current Bylaw, the proposed approach maintains much of the complexity of Schedule B. Schedule B remains a complex and expensive way to recover a relatively small amount of money (estimated by MVRD at $125,000). For example, industry stakeholders report annual monitoring costs of up to $150,000 for trace-level odorous contaminants required to be monitored under the Bylaw. B.C. is not aware of other jurisdictions that charge emission fees on the array of compounds proposed by MVRD. For the modest cost recovery desired by MVRD, simpler approaches suggest themselves, such as charging fees on total reduced sulfur compounds (TRS) as the Province does and MVRD has previously done.

We recommend Schedule B be removed from the Bylaw and replaced with a simpler approach. Permit conditions for facilities with potential odorous emissions can still include a range of measures including effective control technologies and complaint response protocols.

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Environmental protection is a core objective of the proposed Bylaw and is strongly supported by the Province. At the same time, it is essential to balance this with other critical priorities—affordability in sectors such as agriculture and housing and maintaining BC's economic competitiveness. Permit fee structures that are disproportionately high or unpredictable risk undermining investment, increasing consumer costs, and placing undue pressure on sectors such as agrifood and housing that are already facing affordability challenges.

We appreciate MVRD's significant efforts to improve the Bylaw and acknowledge positive steps such as the reduction in OAC fee rates and the proposed cap on application fees. Further revisions are, however, necessary to ensure the Bylaw supports both environmental protection and economic resilience. We recommend further review and alignment with provincial objectives, ensuring that environmental goals are met without compromising affordability or regional competitiveness.

Sincerely,

Fazil Mihlar
Deputy Minister
Ministry of Jobs and Economic Growth

Kevin Jardine
Deputy Minister
Ministry of Environment and Parks

Michelle Koski
Deputy Minister
Ministry of Agriculture and Food

Attachment: July 29, 2025, Letter – Comments on Proposed Amendments to Metro Vancouver Air Quality Management Fees Bylaw No. 1330, 2021.

cc: Conor Reynolds, Director, Air Quality & Climate Action Services, Metro Vancouver Regional District

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DEC 0 4 2025

File: CR-24-01-016

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Dear Deputy Minister Jardine, Deputy Minister Koski, and Deputy Minister Mihlar;

Update on Proposed Amendments to Metro Vancouver Regional District Air Quality Management Fees Regulation Bylaw No. 1330, 2021

Thank you for your feedback on the proposed amendments to Metro Vancouver's Air Quality Management Fees Regulation Bylaw and for your continued engagement. Since receiving your letter dated July 29, 2025, we have made several adjustments to the proposed amendments, which are outlined later in this letter and were shared with staff from the Ministry of Environment and Parks and the Ministry of Jobs and Economic Growth on November 21, 2025. We have made some further adjustments in response to your letter dated December 1, 2025, with a particular focus on cost considerations for regulated businesses at this time of economic uncertainty. To allow for deeper engagement with the Province and industry representatives, the timeline for seeking Metro Vancouver Regional District (MVRD) Board approval on bylaw updates has been adjusted to early 2026.

Need for Timely Amendments and Consideration of Feedback

Metro Vancouver is proposing amendments at this time because the current bylaw in effect contains ambiguities and fee rates that can cause some permit holders to pay unintended higher fees in 2026. These issues need to be addressed promptly. We appreciate the input provided in your December 1, 2025 letter, with additional context regarding your outstanding areas of concern. The adjustments described below are being integrated into the proposed amendments, while the

project team continues to explore options to address outstanding concerns and overall feedback from various audiences prior to bringing this to the MVRD Board for consideration.

1. **Concern over the current bylaw's scheduled increase to fee rates for all air contaminants between 2025 and 2028 with request to pause current amendments**

The scope of this bylaw update is limited to odorous air contaminants and permit application fees to establish fair rules for all facilities while preventing some facilities from being charged unintended higher fees in 2026. However, we heard strong feedback about predictability and overall competitiveness. In response, Metro Vancouver is proposing lower, predictable fee rates for the odorous air contaminants that are the subject of this bylaw update, which apply to the seven facilities currently permitted for these emissions. Total estimated emission fees for odorous air contaminants across these facilities would be approximately $50,000 in 2026, depending on measured emissions and conditions in forthcoming permits.

In response to your request, we are also considering a four-year review cycle for all fee rates to ensure alignment with actual program costs, emission impacts, and economic conditions. Staff can start this process in 2026 while continuing to pursue the bylaw update underway. Metro Vancouver will engage with all interested parties including the BC government during each review of rates.

2. **Concern over proposed cap of $450,000 on permit application fees**

Currently, there is no cap on permit application fees which can lead to unintended higher levels of fees for some applicants. It is important to emphasize that in the past ten years, 85 per cent of application fees have been less than $10,000 and only one has been greater than $250,000. The initial proposal was a $450,000 cap based on historical efforts to assess permit applications for large, complex facilities. After benchmarking against jurisdictions with similar regulatory models and considering feedback from industry and the Province, Metro Vancouver aims to lower the proposed caps to:

- $220,000 for a new permit
- $110,000 for a permit that would authorize emissions from a facility with an expiring permit

The previous Air Quality Management Fees Regulation Bylaw No. 1083, 2008 had an application fee cap of $50,000. This amount was insufficient to recover Metro Vancouver's costs to process applications for new permits and significant amendments, which led to the removal of a cap in the current bylaw. These caps are only relevant to the largest emitters. During engagement in 2025, the public raised the concern that reducing the cap on the largest emitters could shift more costs to smaller emitters over time.

A permit application fee is charged when an emitter seeks authorization of air emissions from a new facility or from a facility with an expiring permit or approval. To continuously improve air quality in a densely populated industrial centre within a constrained airshed, permits are typically

issued with a term of 10 years or more. For some facilities that aren't employing best available control technology yet, the term can be less than 10 years.

3. Call for substantial simplification of odour management approach

Feedback emphasized the need for clarity, competitiveness, reduced burden, and predictability. We also heard strong feedback about odours causing discomfort and impacts on people's well-being, and ability to work and spend time outdoors. Each year, Metro Vancouver receives about 2,000 complaints on odorous air contaminants; therefore, it is critical that staff have the tools to respond to those complaints and work with emitters in a predictable way to find cost-effective solutions.

Feedback from the BC government raised concerns about the level of complexity associated with odour management in the bylaw, in which Metro Vancouver staff considered alternative methods. Assessing fees on complaints received or effort expended is less predictable. Charging for total reduced sulphur compounds and volatile organic compounds only, as was done prior to 2022, is less proportional to facility impacts and was not considered an effective way to regulate odorous emissions.

After carefully considering research and feedback from the Province and interested parties, the project team intends to recommend the following changes:

- Substantially lower fee rates and reintroducing a rate for total reduced sulphur compounds;
- Shorter list of contaminants that can be assessed with published measurement methods;
- Consistent rates for permitted and measured contaminants;
- Rates displayed in the bylaw for all contaminants subject to fees;
- Clear rules: fees based on permit limits where they exist, otherwise fees based on required measurements;
- No fees for undetectable contaminants; and
- Definitions clarified to prevent double-counting of impacts and to eliminate discretion.

These changes will simplify the framework while maintaining its effectiveness at addressing impacts of odorous air contaminants.

Communications and Engagement Plan

Metro Vancouver staff continues to work closely with BC government staff and other interested parties to ensure that adjusted bylaw amendments reflect shared priorities. To keep all interested parties informed, the project webpage has been updated to convey how feedback is shaping the bylaw amendments, and email notifications are being sent to those who participated in engagement. We will continue to receive and consider feedback until the MVRD Board decides on bylaw amendments.

Next Steps for Collaboration with BC Government

Metro Vancouver remains committed to working closely with BC government staff as the project team finalizes the bylaw amendments that will be recommended to the MVRD Board. While I trust that the adjustments outlined in this letter respond to your concerns, I would be pleased to meet with you to review these adjustments and discuss next steps. In the meantime, if you require any additional information, please contact Conor Reynolds, Director, Air Quality and Climate Action Services by email at conor.reynolds@metrovancouver.org.

Yours sincerely,

Jerry W. Dobrovolny, P.Eng., MBA
Commissioner/Chief Administrative Officer

JWD/HM/eb

80868180

Reference: ENV 419095 / JEG 170218 / AF 287092

January 30, 2026

Jerry Dobrovolny
Commissioner/Chief Administrative Officer
Metro Vancouver Regional District (MVRD)
Metrotower III, 4515 Central Boulevard
Burnaby BC V5H 0C6

Sent via email: jerry.dobrovolny@metrovancouver.org

Government of British Columbia: Ministries of Environment and Parks; Jobs and Economic Growth; and Agriculture and Food

RE: MVRD Air Quality Management Fees Regulation Amendment Bylaw No. 1440, 2026 (Air Quality Management Fees Regulation Bylaw No. 1330, 2021)

Dear Jerry Dobrovolny:

At its January 16, 2026, meeting the MVRD Air Quality Committee (Committee) referred proposed amendments to the Air Quality Management Fees Regulation Bylaw (bylaw) back to staff to allow for further engagement with the Province and to ensure greater alignment with provincial recommendations before advancing the bylaw amendments. This referral reflects Committee members' stated concerns with the level of proposed air emission fees, the complexity of provisions for odorous air contaminants (OAC) and the broader economic and competitiveness impacts of the bylaw.

In response to that direction, we are providing additional input on the key issues raised during the Committee's deliberations and identifying specific areas where further refinement would support both economic and environmental objectives. We acknowledge that MVRD staff have proposed several positive changes to the bylaw; however, we remain concerned that the proposed amendments do not adequately support regional and provincial economic competitiveness. Comparatively high fees on air emissions and high costs of air permit compliance increase operating costs for existing businesses in the region, placing them at a competitive disadvantage, while also deterring potential new business. In addition, unique regulatory approaches, significantly different from those elsewhere in North America, such as the fee methodology for OAC, create uncertainty for businesses, especially potential new entrants.

...2

Ministry of Environment and Parks | **Ministry Jobs and Economic Growth** | **Ministry of Agriculture and Food**
Mailing Address:
PO Box 9339 Stn Prov Govt
Victoria BC V8W 9M1

While some businesses may have the ability to pass along high regulatory costs to consumers in the form of higher costs for their products, this exacerbates affordability pressures for British Columbians. Many B.C.-based facilities compete directly against imported products from jurisdictions that do not face comparable regulatory cost structures. In these cases, prices in the B.C. market are constrained by lower-cost imports, leaving local producers with little ability to pass through locally higher costs. The result is a direct increase in operating costs for B.C. firms, placing them at a competitive disadvantage relative to out-of-province and international suppliers, and increasing the risk of reduced investment, loss of market share and job impacts within B.C. Our July 2025 letter (Attachment 2) outlined these cost and competitiveness impacts of the bylaw.

To address these overall cost concerns, our December 2025 letter (Attachment 3) outlined the following three key recommendations:

1. **Pause the proposed overall fee increases scheduled from 2025 to 2028.**
2. **Review permit application and re-application fees to ensure consistency with cost recovery principles and benchmarks and with provincial and interprovincial benchmarks.**
3. **Remove Schedule B (OACs) and replace with a simpler approach.**

Attachment 1 identifies areas where the January 16, 2026, proposed amendments (Bylaw 1440) reflect sufficient alignment with Provincial recommendations. For areas where there is only partial alignment, Attachment 1 provides further recommendations for improving alignment with concerns identified by the Committee and the Province. Based on the Province's analysis and the issues raised in our correspondence, further bylaw changes to align with Provincial recommendations are both feasible and warranted. Importantly, these changes can be made without compromising the core bylaw objectives of environmental protection and excellent air quality.

Sincerely,

Kevin Jardine
Deputy Minister
Ministry of Environment
and Parks

Fazil Mihlar
Deputy Minister
Ministry of Jobs and
Economic Growth

Eric Kristianson
Acting Deputy Minister
Ministry of Agriculture
and Food

cc: Conor Reynolds, Director, Air Quality and Climate Action Services, Metro Vancouver Regional District

...3

Attachments (3)

Attachment 1**:** Alignment of January 16, 2026, proposed bylaw amendments (Bylaw 1440,2026) with provincial recommendations
Attachment 2: July 29, 2025, Letter – Comments on Proposed Amendments to Metro Vancouver Air Quality Management Fees Bylaw No. 1330, 2021
Attachment 3: December 1, 2025, Letter – RE: Air Quality Management Fees Bylaw No. 1330, 2021 (Bylaw)

<u>Attachment 1:</u> Alignment of January 16, 2026, proposed bylaw amendments (Bylaw 1440, 2026) with provincial recommendations

<u>Provincial Recommendation 1:</u>
Pause the proposed fee increases to ensure environmental and cost recovery objectives are met without eroding regional competitiveness or affordability

MVRD emissions fee rates have increased at rates far above inflation from 2021 through 2025 (Schedules A1 through A5 of the bylaw), and if the bylaw is left unchanged, there will be further cumulative increases of 27 percent to 72 percent between 2025 and 2028, depending on the pollutant (Schedules A6 to A8).

MVRD Response: Because this was not consulted on, MVRD staff have previously stated they are unable to make this change, which would require an adjustment or delay to some of the emissions fee rate schedules in the bylaw. However, as part of the proposed amendments, a bylaw requirement is proposed for a fee rate review beginning immediately and concluding by end of 2027 and every four years thereafter.

Recommendation for further alignment: The Province supports the proposed fee rate review. However, this solution does not offer any short-term relief to industry, and fee rates would continue to rise during the review process. The Province's recommendation was focused on providing immediate relief for industry in a time of extraordinary economic pressure. **Therefore, the Province recommends that MVRD further explore options for a short- to medium-term pause in fee rate increases while the overall review takes place.**

<u>Provincial Recommendation 2:</u>
Further review the proposed air permit application and reapplication/renewal fees to ensure consistency with transparent cost recovery principles and with Provincial and interprovincial benchmarks.

High application fees are a concern for both new and existing businesses. Unlike provincial permits, MVRD permits regularly expire (some with terms as short as five years, average term closer to 12 years) so application costs have become a recurring expense for businesses in the region. Application costs include the fees payable to MVRD as well as cost for air quality modelling and other required assessments.

MVRD Response: In response to concerns expressed by the Province and industry, MVRD has proposed to cap application fees at $220,000 for new facilities and $110,000 for existing facilities with expiring permits. MVRD has emphasized that since application fees are based on the emission fees for the emissions specified in an application, most facilities pay far smaller amounts than these maximum caps and that only six or seven of their existing 150 permits have sufficient emissions that they would pay the maximum $110,000 fee to reapply when their permits expire.

Recommendation for further alignment: The Province supports MVRD's need for reasonable cost recovery for regulating air emissions, and notes that these application fee caps are a significant improvement from the existing bylaw which does not contain any cap on maximum fees. However, the proposed $220,000 / $110,000 caps for air permit applications/re-applications remain among the highest in Canada, approximately matched by Quebec but significantly higher than most other provinces. **Therefore, the Province recommends MVRD revise the proposed caps to a lower level, representing the minimum required for reasonable cost recovery. Particular attention should be given to the reapplication fees for existing facilities as these are an additional recurring expense unique to MVRD driven by MVRD's decision to use short permit terms.** These recurring application costs for existing facilities are absent or much lower in other Canadian jurisdictions. **In addition, the Province recommends that MVRD staff provide analysis demonstrating how the proposed caps align with cost recovery for permitting of facilities.**

Provincial Recommendation 3:
Remove Schedule B from the Bylaw and replace it with a simpler approach.

MVRD Response: In response to concerns expressed by the Province and industry, MVRD has proposed multiple changes to Schedule B, which deals with fees on odorous air contaminants (OACs). The most important proposed change is a major reduction of the OAC fee rates relative to the current bylaw. Other significant proposed changes include a reduction in the number of scheduled OACs, eliminating fees on undetectable substances, and limiting fees to the specifically listed OACs.

Recommendation for further alignment: The Province notes that these proposed changes represent significant improvements. The 2021 bylaw specified fee rates for OACs up to $1,000,000 per tonne, which would have resulted in unacceptably high fees for affected industries. The proposed lower fee rates significantly mitigate this issue. Nonetheless the framework for recovering costs of odor management remains more complex than in any other North American jurisdiction. The Province expects these fees to be charged in a simple and transparent fashion that does not impose additional cost and complexity on permitees. For comparison, the Province charges fees on emissions of total reduced sulphur (TRS) and volatile organic compounds, two categories that together encompass most OAC. The Province further notes that permitting powers are separate and independent from powers to assess fees for applications and permits. Therefore, a simplified fee methodology does not constrain the District Director from imposing monitoring requirements or emission limits for specific air contaminants if it is considered advisable for the protection of the environment (which includes public health). And, critically, the District Director can require works or other measures to control or reduce discharges of air contaminants regardless of how permit fees are assessed. **Therefore, as outlined in the December 01, 2025, letter, the Province recommends Schedule B be removed from the Bylaw and replaced with a simpler approach. Permit conditions for facilities with potential odorous emissions can still include a range of measures including effective control technologies and complaint response protocols.**

Provincial Recommendation 4:
Eliminate statutory decision making from the determination of fees

MVRD response: The proposed amendments have addressed this issue and appear to have removed those cases where MVRD staff would have had to choose between different methodologies for assessing fees.

Provincial Recommendation 5:
Specify fee rates for pollutants that belong to multiple categories

MVRD response: The proposed amendments have addressed this issue by clearly specifying which fee rate applies in this situation.

Provincial Recommendation 6:
Clarify definitions of substance categories

MVRD response: MVRD has proposed multiple changes to the definitions of substances and substance categories to reduce and clarify overlaps.

Recommendation for further alignment: Most of the proposed changes are positive for clarity of the bylaw. However, the Province notes the definition for hazardous air pollutants references a lengthy schedule that appears to include substances such as liquid effluents not typically considered air contaminants and other substances such as long banned pesticides for which it would not be advisable for MVRD to authorize emissions. **Therefore, the Province recommends that MVRD further review (and in some cases streamline definitions) for maximum regulatory clarity.**

From: Jerry Dobrovolny
Sent: Thursday, February 12, 2026 1:49 PM
To: JEDI.DM@gov.bc.ca; DM.ENV@gov.bc.ca; Eric.Kristianson@gov.bc.ca
Cc: Heather McNell <Heather.McNell@metrovancouver.org>
Subject: RE: MVRD Air Quality Management Fees Regulation Amendment Bylaw No. 1440, 2026

Dear Fazil,

Thank you for your letter dated January 30, 2026 that indicates continued concern about the proposed amendments to Metro Vancouver's Air Quality Management Fees bylaw. Our staff teams have had several productive meetings – which have been helpful for us to provide changes that we feel like have responded to the expressed concerns. And, we hear there continue to be concerns. Having reviewed your latest recommendations, we believe we have identified additional changes that can address each one, however, achieving common ground is challenging without a direct conversation.

It would be much appreciated if I could have a meeting with you, and if you'd like, Kevin and Eric, in the next couple of weeks. We need to move amendments to the bylaw forward before the end of April – as a delay will result in some facilities in the region facing significantly higher fees under the existing structure, an outcome that neither Metro Vancouver nor the Province wants.

We agree that it is critical that amendments to the Air Quality Management Fees bylaw do not compromise Metro Vancouver's responsibility to keep the region's air clean and healthy for those who live and work here.

I am confident we can find a path forward that works for all parties if we can meet and work through remaining concerns in the next couple of weeks.

Sincerely,

Jerry W. Dobrovolny, P.Eng., MBA
Commissioner/Chief Administrative Officer

Appendix 2:
Proposed Amendments to Air Quality Management Fees Bylaw:
Engagement Correspondence Received June to August 30, 2025

Affected Public

- Resident - June 30, 2025

Affected Regulated Community

- Amrize Canada - July 31, 2025
- Heidelberg Materials - July 31, 2025
- Cement Association of Canada - August 1, 2025
- Pure Sunfarms Corp. - August 6, 2025
- West Coast Reduction Ltd. - August 8, 2025

Letters have been appended in chronological order.

From: [redacted]
Sent: Monday, June 30, 2025 8:49 AM
To: Metro Vancouver Air Quality Bylaws
Subject: Feedback on Air Quality Management Fees – Odorous Emissions in East Vancouver

Dear Metro Vancouver Air Quality Team,

I'm writing to provide feedback on the proposed amendments to the Air Quality Management Fees Regulation Bylaw No. 1330.

As a resident of East Vancouver [redacted] and someone who works nearby [redacted], I want to express my concern about ongoing odour issues in our neighbourhood — particularly in the summer months. For years, strong and unpleasant smells from nearby industrial operations have been a known problem in this area. These odours affect quality of life, impact local businesses, and are increasingly incompatible with the growing mix of residential and commercial uses in the area.

With East Van becoming more mixed-use and dense, it's essential that industrial operations are held accountable for the broader impact of their emissions — especially odorous ones. I appreciate that the proposed amendments to the bylaw aim to clarify and strengthen how fees for odorous air contaminants (OACs) are applied. The inclusion of fee caps, updated measurement methods, and recognition of compounds that cause significant nuisance are steps in the right direction.

However, I urge Metro Vancouver to prioritize enforcement and transparency in this process. The community needs to see that these updated fees will result in **real pressure on emitters to reduce their impact**, not just minor administrative changes. If businesses are not actively improving their emission controls, they should face increasing financial consequences.

I also encourage you to consider how this bylaw can better reflect the changing nature of East Vancouver, where industrial and residential communities are increasingly sharing space. Living and working in this neighbourhood should not mean enduring unhealthy or disruptive air quality.

Thank you for the opportunity to comment. I hope the final amendments will support stronger air quality protections for our community.

Thanks,

[redacted]

July 31, 2025

Metro Vancouver
Air Quality and Climate Action Services
4730 Kingsway, Burnaby BC

Attention: Esther Bérubé, P.Eng. Division Manager and Bylaw and Regulation Development
AQBylaw@metrovancouver.org

Dear Ms. Bérubé,

Thank you for the opportunity to comment on the proposed amendments to Metro Vancouver's Air Quality Management Fees Regulation Bylaw No. 1330. Amrize Canada, previously Lafarge Canada, is the largest domestic producer of cement in Canada, and we are proud to share that our Richmond Cement Plant produces one of the lowest carbon intensity cement in all of Canada.

The Richmond Cement Plant has invested significantly in facility upgrades since the late 1990s, beginning with the installation of best available technology, a highly efficient five stage pre-heater pre-calciner kiln with baghouse filtration. With the introduction of provincial carbon tax in 2008, the Richmond Plant changed fuels from coal to natural gas, and invested over $18MCAD in co-processing to allow for the use of biogenic waste-based fuels to lower combustion related CO2; cement formulation has also changed since 2010 to produce a lower carbon intensity cement. Our commitment to improve our environmental performance is steadfast and has resulted in change for the betterment of the building community in Metro Vancouver and the Pacific Northwest.

It will not be a surprise to Metro Vancouver that the lower mainland is an exceedingly expensive region to operate as industry. Many improvements implemented by the Richmond Plant has been completed with environmental performance in mind, but also to ensure the viability of cement manufacturing at the Richmond Plant for many years to come. The Richmond Plant employs over 100 people on site and indirectly employs thousands of people in and around the lower mainland. Air Permit fees paid by the Richmond Plant have steadily increased and are one of the highest in all Amrize facilities in North America, and the amendment fees are the highest in North America.

Amrize understands and supports the user – pay principle, and that Metro Vancouver must recover regulatory program cost in a fair manner. Amrize has demonstrated through historical permit reviews that we are accepting of reasonable fee increases and changes in emission limits for the benefit of air quality and human health in the region. Previous permit amendments for our Richmond Facility have been completed in a timely manner and we do not believe have incurred excessive time and cost to Metro Vancouver.

Amrize is however, not in support of subsidizing other industries in the Metro Vancouver region who continue to extend permit renewals for years with no end in sight and with no intension to spend capital to install new technology to reduce emissions. The proposed maximum fee for application for authorization of $450,000 feels punitive for industries who are willing to work together with Metro Vancouver on air quality improvement.

2300 Rogers Avenue, Coquitlam BC
T: 1 604 521 8811 **amrize.com**

We understand that this proposed maximum is to replace the current bylaw which has no maximum, but the proposed maximum is not an improvement. The Richmond Plant, based on the current permit fees, will have to pay the proposed maximum and the fee does not help in preserving competitiveness for domestic manufacturing during a time for economic upheaval. Decreasing the proposed maximum as an incentive for proponents who are able to complete amendments in a timely manner could be a good method to decrease load on Metro Vancouver and also lower cost for all parties. We are proposing that Metro Vancouver offer a rebate of half the maximum authorization fee to the permittee for use as a credit their first year of permit fee after renewal, if they are able to complete the renewal within a period of time agreed upon with Metro Vancouver.

For instance, should the proponent's new amended permit fees amount to $500,000, they would pay the maximum application fee of $450,000. If at the beginning of the renewal process, there is an agreed upon timeline for the renewal, and the permit is renewed within this period, Metro Vancouver would rebate $225,000 to the permittee for use to pay for their $500,000 permit fee, resulting in a remaining balance of $275,000 to be paid in the first year.

In regards to the proposal for cases where no permitted limits exist for odorous air contaminants (OACs), and the measured emissions for a specified OAC are below the detection limit for analytical method used, Amrize does not agree to the application of the emission fee rate to 25% of the analytical method detection limit. Detection limits are typically in line with the lowest concentration at which the human nose can first detect a smell; should measured emissions be below detection limits, they should not be charged a fee. Amrize understands that while odor can be a significant nuisance, it is not immediately harmful to human health.

Thank you for the opportunity to provide comments on the proposal. My team and I are available to discuss our feedback in more detail.

Regards,

Stephanie Voysey, P.Eng.
Head of Sustainability and Environment
Amrize Canada Inc.

2300 Rogers Avenue, Coquitlam BC
T: 1 604 521 8811 **amrize.com**

Heidelberg Materials

Heidelberg Materials Canada Limited
Delta Cement Plant
7777 Ross Road
Delta, BC V4G 1B8

July 31, 2025

Metro Vancouver
Air Quality and Climate Action Services
Parks and Environment
4730 Kingsway
Burnaby, BC V5H 0G6

Attention: Esther Berube, P.Eng. Division Manager, Bylaw and Regulation Development
AQBylaw@metrovancouver.org

Subject: Proposed Amendments to Air Quality Management Fees in Metro Vancouver

Dear Ms. Berube,

Heidelberg Materials Canada Limited (formerly Lehigh Hanson Materials Limited) would like to thank you for the meeting with your staff on July 14, 2025, on the proposed amendments to Metro Vancouver's air quality management fees in Regulation Bylaw No. 1330, 2021. As per our meeting, there were two key amendments that we had provided our comments: reducing the maximum application fees for authorizations and charging interest on overdue payment of fees.

Heidelberg Materials appreciates that Metro Vancouver is proposing a maximum limit for application fees for permits, approvals and amendments; however, we believe that the limit of $450,000 is still exceptionally high. In 2020 when Metro Vancouver had proposed fee increases, we had recommended that the cap of $50,000 be maintained for the approval of new permits or the renewal of expiring permits. In consideration of what other cement plants may be paying in terms of permit application fees, we find that Metro Vancouver's fees are significantly higher. The following table lists fees paid by some other cement plants. Included are two other Canadian Heidelberg Materials cement plants: Edmonton, AB and Picton, ON.

Table 1

Location	Permit Renewal Fee	Application Fee for a New Permit
Alberta – Edmonton Plant	$15,000	$30,000
Ontario – Picton Plant	Less than $18,000	$18,000
Nova Scotia	$8,625.15	$8,625.15
Quebec	$11,955 (amendment)	
Pennsylvania	$4,000 USD	

Although it is not clear how often the above permit renewal fees are paid by these other cement plants as it would depend on their permit terms, we could consider the scenario that if a plant had a term of only four years, the cost of two term renewals would still be significantly less than Metro Vancouver's one term renewal fee.

Metro Vancouver has stated that the justification for their proposed $450,000 cap is based on cost recovery for their regulatory programs. Heidelberg Materials believes that the annual permit fees for high emitting industries should already cover these costs. In 2024, our facility in Delta paid the air quality permit annual fee of $1,062,889.93. It should be noted that the emission fee rates will continue to increase annually until 2028.

Metro Vancouver needs to recognize that there are business challenges and costs that companies such as Heidelberg Materials face. We cover the cost of all emission testing as required in the air quality permit as well as the cost of special studies such as air dispersion modelling requested by Metro Vancouver. The permit also requires us to operate the continuous emission monitoring system (CEMs) for our kiln stack emissions. Heidelberg Materials covers all costs for the CEMs including testing, maintenance and replacement of equipment. There are also maintenance and replacement costs for all our dust collection systems.

In 2020, Heidelberg Materials installed the selective non-catalytic reduction (SNCR) system in our kiln line to reduce NOx emissions. This was a multi-million-dollar capital investment. Since the installation, we have had to add to our operating budget the maintenance cost for the SNCR as well as the cost of the reagent of aqueous ammonia.

Heidelberg Materials also faces the challenge of tariffs on the shipment of our product to the United States. There are also costs associated with greenhouse gas emissions in that we have had to pay the carbon tax up until Q1 2024 and now the output-based pricing system as of April 1st, 2024.

With the business challenges and increasing operating costs, Heidelberg Materials does not support Metro Vancouver's proposed maximum limit of $450,000 for application fees for permits,

Heidelberg Materials

approvals and amendments. We believe this limit is exceptionally high and we recommend that the cap be reduced to as low as $50,000 as it was before 2021. In this letter, we have included an attachment of an earlier letter that we had submitted with our comments on the 2020 proposed fee amendments. This letter dated April 30, 2021 also stated our opposition to the elimination of the Measured Discharge Program (MDP). With the elimination of the MDP, Heidelberg Materials has lost the potential savings of $100,000 to $150,000 in our annual permit fees based on actual emissions.

On Metro Vancouver's proposed amendment to charge interest for overdue invoices after 30 days, Heidelberg Materials does agree with the charges of 1.25% per month or 15% per annum. However, we find the 30 days payment period too short, and we have had issues in the past on meeting the timeline as our accounts payable system is complex. We request that the payment terms be extended to 45 days.

Heidelberg Materials Canada Limited appreciates this opportunity to respond to Metro Vancouver's proposed amendments to the air quality management fees in Regulation Bylaw No. 1330, 2021. We hope that you will take into consideration of our concerns and recommendations.

Yours truly,

Eileen Jang, P.Eng.
Environmental Manager

cc: Pascal Bouchard, Plant Manager, Heidelberg Materials Canada Limited

Attachment: Letter dated April 30, 2021 on the Proposed Amendments to Air Quality Fees and Measured Discharge Program

Lehigh Cement,
a division of Lehigh Hanson Materials Limited
7777 Ross Road
Delta, British Columbia V4G 1B8
P.O. Box 950 V4K 3S6

April 30th, 2021

Metro Vancouver
Parks and Environment
Metrotower Office Complex – Metrotower III
4730 Kingsway
Burnaby, BC V5H 0G6

Attention: B. Neal Carley, P. Eng. General Manager, Parks and Environment
Neal.Carley@MetroVancouver.org
AQBylaw@MetroVancouver.org

Subject: Proposed Amendments to Air Quality Fees and Measured Discharge Program

Dear, Mr. Carley:

Lehigh Hanson Materials Limited is writing to provide feedback on the proposed amendments to Metro Vancouver's air quality fees for 2022 and 2025 and the proposed discontinuation of the Measured Discharge Program (MDP). Our plant is strategically located in the Lower Mainland to provide cement to the construction industry. Lehigh is a strong contributor to the local economy, supporting a vast variety of jobs and services. We appreciate the opportunity to provide our comments.

We are concerned that Metro Vancouver is asking industry to carry a disproportionate share of the cost of regulation and enforcement. This position overlooks the reasons why industry exists which includes providing goods and services that benefit the community. It is fair that regulatory costs be the responsibility of both industry and the community.

Lehigh opposes the proposed air contaminant fee rates as they would more than double our annual permit fees by 2025. Such an increase is grossly unreasonable. It is not the intent for industry to emit but unfortunately emissions are a result of the process. Higher fees are not always an incentive to achieve further emission reductions because there can be a limit to what is achievable. Table 1 shows the potential annual permit fees Lehigh would be expected pay compared to our current fees.

Table 1

	Current Year 2021	2022	2025
Base total for air contaminants with permit limits	$ 588,763	$ 846,746	$ 1,216,817
Additional fees for air contaminants with no permit limit	$ 102,393	$ 194,096	$ 448,121
Total annual fee without the MDP	$ 691,156	$ 1,040,842	$ 1,664,938

Lehigh does not support the removal of the $50,000 cap for the approval of new permits or renewed expiring permits. Without the cap, a large emitter would have to pay a substantial amount for a permit renewal in addition to the annual air quality permit fees. It is unlikely that the cost for Metro Vancouver to review and approve one permit would be in excess of the annual permit fees, let alone two times the annual fees. It should be noted that in 2016, Metro Vancouver put in place the

$50,000 cap because it was considered unfair for a certain large emitter to pay an excessive permit renewal fee of over one million dollars.

The proposed discontinuation of the MDP penalizes permit holders. It is understood that industries maintain permit limits that are more than their actual emissions to allow for a short-term increase because of process variability. Since fees are based on permit limits rather than actual emissions, the MDP would account for the differences when the permittee meets stringent requirements.

Metro Vancouver states that the MDP favours large emitters because they are more likely to have expensive continuous emission monitor equipment (CEMs) needed to demonstrate eligibility for the program. For Lehigh, the CEMs is a requirement in the air quality permit. If the MDP were eliminated, Metro Vancouver would not necessarily allow the permittee to discontinue the use of the CEMs. Lehigh strongly opposes the proposed discontinuation of the MDP.

We recommend that Metro Vancouver re-evaluate the proposed amendments to the air quality fees and have them fairly reflect the cost of regulation and enforcement. Lehigh also recommends that Metro Vancouver retain both the Measured Discharge Program and the $50,000 cap for the approval of new or renewed expiring permits.

Sincerely yours,

Eileen Jang, P.Eng.
Environmental Manager

Cc: Pascal Bouchard, Plant Manager, Lehigh Delta Cement Plant

Cement Association of Canada

August 1, 2025

SUBMISSION: Proposed Amendments to Air Quality Management Fees Bylaw in Metro Vancouver

Metro Vancouver

Air Quality and Climate Action Services

Parks and Environment

4730 Kingsway

Burnaby, BC V5H 0G6

Attn: Esther Berube, P.Eng. Division Manager, Bylaw and Regulation Development

AQBylaw@metrovancouver.org

Dear Ms. Berube,

The Cement Association of Canada (CAC) appreciates the opportunity to comment on the proposed amendments to the Air Quality Management Fees Regulation Bylaw No. 1330, 2021.

The CAC is the leading voice of Canada's cement industry, whose six member companies produce the cement, concrete and aggregates needed to build housing and infrastructure and create economic growth in communities across the country, including Metro Vancouver.

B.C. has two cement facilities, both located in the Metro Vancouver region, the Amrize (formerly Lafarge) facility in Richmond and the Heidelberg Materials facility in Delta. The cement and concrete industry in B.C. support more than 10,000 direct and indirect jobs and generate $11 billion in direct, indirect, and induced economic benefits – with many of these benefits realized in Metro Vancouver.

We are deeply concerned that the proposed amendments related to permit fees will levy unjustified and onerous costs to cement manufacturing facilities, with limited transparency and certainty, at a time when it is more important than ever to protect Canadian and regional manufacturing.

Like energy, cement and concrete are strategic commodities upon which B.C.'s economy depends. B.C. can only maintain economic sovereignty by ensuring that it has a reliable domestic supply of cement and concrete to support the construction of infrastructure projects, including energy and electricity projects, roads and bridges, hospitals and schools, and homes.

The cement industry is undergoing an historic innovation cycle to modernize and compete in the new global economy. Attracting investment is critical for British Columbian cement facilities to remain competitive. Investment and modernization will go to facilities where there are market conditions that support competitiveness. B.C. is already a high-cost jurisdiction where our facilities face significant pressure from more polluting and higher carbon imports that do not face carbon pricing or similar regulatory costs. Proposed amendments to Metro Vancouver's Air Quality Management Fees risk significantly

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exacerbating this pressure, to the detriment of the environment and B.C.'s economy. **Without adjustment, we are at even greater risk of displacing B.C. production and jobs with more polluting higher-carbon imports.**

While the cement industry appreciates the intent of the amendments to clarify and update definitions for permittees, the amendments **do not provide the needed transparency and certainty to protect B.C.'s cement industry**. In particular, the CAC is concerned regarding the limit of $450,000 on application fees for businesses applying for authorization to discharge air contaminants. Cement facilities already pay significant annual costs to comply with the existing by-law and it is unclear how and or why a $450,000 application fee aligns with the stated cost recovery goals. Further, these increased compliance costs are being added in an already challenging competitiveness environment, driven by B.C.'s uniquely stringent industrial carbon price as well as unprecedented economic turmoil caused by the U.S.'s trade upheaval. The viability of cement manufacturing in the lower mainland is at risk.

We request that Metro Vancouver:

- Decrease the application fee limit to preserve competitiveness and attractiveness for foreign direct investment within the region. Given that Metro Vancouver is unique in requiring both an annual emissions fee, a provincial industrial carbon price and a significant permitting fee, capping the limit at a meaningfully lower level would be better aligned with the region's goals to attract and preserve building materials manufacturing activity.
- Increase transparency regarding the use of annual emissions fees, including how they relate to cost-recovery and contribute to abating emissions.
- Increase fairness and transparency with respect to establishing term lengths for permits. The CAC understands that Metro Vancouver began establishing expiry dates for permits over the last decade, and that decisions on term lengths for permits are made on a case-by-case basis. This could lead to unfairness and uncertainty for large facilities, further damaging the investment environment in the region.

Against the backdrop of increasing instability impacting global supply and demand and rising competition from peer jurisdictions for foreign direct investment, it is critical to ensure that B.C. remains an attractive and viable destination for modernization and investment throughout the materials sector.

We appreciate and share Metro Vancouver's desire to reduce emissions, as we have committed to reaching net-zero emissions across all Canadian facilities by 2050. Since 2008, B.C.'s cement facilities have invested approximately $20 million on multiple capital projects to reduce emissions and improve the environmental performance of our facilities.

However, the significant costs levied on facilities in the Metro Vancouver area are not only a deterrent to attracting further investment and retaining production at existing cement facilities, they will further erode the competitiveness of domestic producers against dirtier, cheaper imported cements from areas of the world with less environmental regulation. B.C. is already the most exposed jurisdiction in Canada to cement imports (largely from Vietnam, Singapore, China). Metro Vancouver's proposed amendments related to the permit fee limit will compound this import pressure, further eroding jobs, investment and carbon leakage in B.C. and threatening that stability of a domestic supply of a building material essential to Metro Vancouver's and B.C.'s economic sovereignty and infrastructure needs.

We appreciate the time you have taken to consult with us and for the opportunity for us to provide our feedback. We are available to discuss our recommendations further: please contact Adam Auer, President and CEO of the CAC at [redacted]

Sincerely,

Adam Auer
President & CEO
Cement Association of Canada

From: [redacted]
To: Metro Vancouver Air Quality Bylaws
Subject: Clarification Requested on Proposed Air Quality Management Fee Increases and Impact on Farms
Date: Wednesday, August 6, 2025 10:41:28 AM
Attachments: [redacted]

Dear Air Quality Bylaw Team,

I am writing regarding the *Proposed Amendments to Air Quality Management Fees* discussion paper, which unfortunately only came to my attention after the August 1 engagement deadline.

After reviewing the document, I found it unclear whether the proposed fee increases are intended to apply to farming activities in the region. As a member of Metro Vancouver's Agricultural Advisory Committee and a representative of the farming community, I would appreciate clarification on this point.

I would also like to express strong opposition to any increase in air quality management fees that would apply to farming activities related to agricultural crops or products. Farms in the region already face significant operational and financial pressures, and any added costs could further impact their sustainability and competitiveness.

Additionally, I would expect that any proposed changes with the potential to affect the agricultural community would be brought to the Agricultural Advisory Committee for input. To my knowledge, this proposal was not presented to the committee—a missed opportunity for meaningful engagement, particularly if producers may be impacted.

Thank you for your attention to this matter. I would welcome the opportunity to provide further feedback should additional consultation take place.

Sincerely,

Julia Cameron

Julia Cameron (she/her)
Vice President, Communications & Corporate Affairs
Pure Sunfarms Corp.
[redacted]
4431 80th Street, Delta, BC, Canada V4K 3N3

WEST COAST REDUCTION LTD.

West Coast Reduction Ltd.
1292 Venables Street
Vancouver, British Columbia V6A 4B4
Phone: 604.255.9301

August 8, 2025

Consultation on Proposed Amendments to
Metro Vancouver Air Quality Management Fees Bylaw 1330

West Coast Reduction Ltd. ("WCRL") offers the following as our feedback and recommendations regarding proposed amendments to the Metro Vancouver Air Quality Management Fees Bylaw 1330 ("the Bylaw"), and the permitting approach the Bylaw necessitates.

While we welcome the opportunity to engage in this process, it may be that other potentially impacted permit holders have been overlooked and are unaware of the issues dealt with in the consultation and therefore not participating. This is because, as Metro Vancouver staff have stated, the Bylaw "works in concert with permits", and a small change to a permit could bring a business's emissions into the scope of a Bylaw it had no opportunity to comment on. It may be, in fact, that the majority of current permit holders that will ultimately be impacted by this bylaw are unaware of this consultation.

This might be a consideration in determining who may have valuable feedback to offer.

The Cost Recovery Concept

The recovery of reasonable administrative costs associated with permitting and monitoring industrial emissions through the collection of fees is an appropriate and accepted practice. The mechanism by which the costs are apportioned, however, should at a minimum have the following attributes:

- Transparency of the source of the costs
- Practicality and reliability of the metric for apportioning the costs
- Predictability of fees for the regulated business
- Efficiency – the cost to the regulator and the business to administer the cost recovery mechanism should not be disproportionate to the costs it seeks to recover

Bylaw 1330 has none of these attributes, and the proposed amendments do nothing to remedy that.

The problems with the Bylaw can be summed up in one example. The stated total annual costs related to odorous emissions that the Bylaw seeks to recover from all affected permit holders is $300,000.00, yet it could cost one permit holder $150,000.00 just to calculate their fee, which turns out to be $1,700,000.00.

The incongruity of these numbers points to a problem much more fundamental than the values in the Bylaw's rate tables which are the focus of the proposed amendments.

Further, it is still unclear if legal costs are or should be included in the costs Metro Vancouver is seeking to recover. What is clear is that legal costs associated with appeals brought on by regulatory overreach, such

as the permit terms necessitated by the Bylaw, that were decided against Metro Vancouver should not be included. To do so would be tantamount to awarding yourself costs for a legal suit you've lost, repeatedly.

Health Costs

The inclusion of the Health Effects Study as a "resource" supporting these amendments on the Metro Vancouver website may mislead some to think it supports the fee calculations and/or can quantify the health-related costs of a particular substance. It cannot, and it does not purport to do so. In fact, as confirmed by the report's author, it does not mention or consider odour in any way.

At issue in this Bylaw are the fees for "odorous air contaminants". It cannot be that the driver for these fees is health impacts when the fee for emitting a recognized Hazardous Air Pollutant is more than 600 times more for its odorous qualities than for its hazardous qualities.

A Barrier to Investment

The inexplicable magnitude and volatility of the fees related to this Bylaw, along with inconsistent messaging regarding interpretation of its application, have created a business environment in the region that is unsuitable for investment.

The scale of the increase in fees that the current Bylaw represents and the reduction of rates that are the subject of the proposed amendments are both on the order of hundreds of times. The proposed amendments do not address or recognize the flawed underlying theories in the Bylaw that result in such volatility. Those underlying theories are the application of Odour Units and the related concept of Odour Detection Thresholds to the calculation of fees. As long as these theories remain at the heart of this bylaw the business uncertainty they create remains.

The Flawed Theories

Odour Units (called "whole emission discharge" in the Bylaw) are a "unit" derived by a scientific-sounding method named Dynamic Olfactometry. However, they are derived in a process that is anything but scientific and involves people sniffing an air sample and determining whether or not they smell something, anything. They have been repeatedly found to be too subjective and inaccurate for use as a permit compliance measurement or fee mechanism by the Environmental Appeal Board, yet they are repeatedly found in Metro Vancouver regulations that are outside of the Environmental Appeal Board's jurisdiction, surrounded in just enough technical verbiage to give them the air of plausibility needed to satisfy the Metro Vancouver Board, but where they are no more appropriate.

The problems with Odour Units pale in comparison to those of the Odour Detection Threshold theory. Odour Detection Thresholds are ostensibly the lowest concentration of a substance, in this case an odorous air contaminant, that the human nose can detect. Where Odour Units attempt to determine the smelliness of an air sample, the Odour Detection Threshold theory attempts to determine the smelliness of an individual substance, apply that to how much of that substance is in an air sample, repeat that for every substance in a sample, apply varying fee rates to each substance and add them all up and determine the fee for the total emission. The compounding huge uncertainties in every step of this process, and faulty

concepts of additive smelliness make this theory fatally flawed and explain why it does not exist in any other jurisdiction in North America, and probably the world.

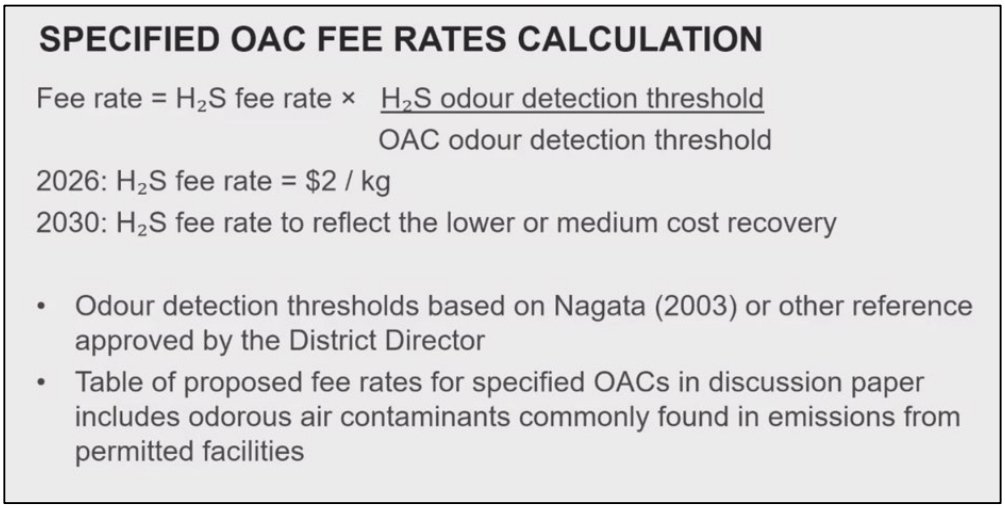
Odour Units, with all of their inadequacies, are at least derived by way of a method (the so-called European Standard, EN 13725:2003) that attempts to apply some form of rigor to their measure. The fundamental problems with Odour Detection Thresholds is that they are derived through various primitive forms of sniff tests and consequently can vary by several orders of magnitude depending on the reference they are found in. There is no single Odour Detection Threshold value for any substance.

To illustrate the uncertainties that the Odour Detection Threshold theory creates in the fee calculations, first consider the two main sources of these values referenced in the Bylaw: Nagata (2003) and Devos (1990). Nagata (2003) is the source of most of the values used in the Bylaw fee calculations. While the paper was written in 2003, it describes an "experiment" conducted between 1976 and 1988, in Japan, where a panel of six people (four of whom remained for the entire experiment) used the "triangle odor bag method" (they sniffed samples) to determine the "odor threshold" for 223 substances.

The other main reference is known as Devos (1990). Devos is an attempt to mathematically "standardize" the widely variable odour threshold values of 529 substances, derived through various methods, found in 105 references, which are on average 70 years old. The oldest of which is 177 years old.

All of these values are based on some form of sniff test and all of the mathematical weighing, normalizing, and standardizing methods applied to the results cannot erase the huge variability of values resulting from this fundamentally subjective method. The definition of Odour Detection Thresholds found in Bylaw 1330 does not note this variability, in fact it suggests that the values used were derived using a standard method. They were not.

To illustrate the implications of this variability, consider the example fee calculation from a Metro Vancouver presentation on the subject below:



Excerpt from Metro Vancouver consultation presentation

The fee rate for an individual substance is derived by dividing one Odour Detection Threshold value by another, compounding their individual variabilities which are factors in the hundreds and resulting in a fee that can have a variability (uncertainty) factor in the tens of thousands.

The fee calculations require that one Odour Detection Threshold for each substance be selected for use in the formula. Metro Vancouver's stated method of selecting one Odour Detection Threshold value amongst the wide range of values is to choose the lowest, which results in the highest fee.

To apply an Odour Detection Threshold value to the fee calculation requires knowing how much of a particular substance is in an emission stream. To calculate the fee for the entire emission requires knowing how much of every substance is in an emission stream. These two things are unknowable, and the attempts to know them (required stack sampling and analysis) that are built into the permit terms that the Bylaw necessitates add yet another layer of compounding uncertainty, complexity and cost to the fee calculations.

Accurate sampling and analysis of these substances is, in most cases, not possible and attempts to do so result in unsupportable data, confusion and enormous cost. WCRL has previously submitted to Metro Vancouver a report from RWDI Air Inc., Technical Review Of Metro Vancouver Source Sampling – Air Quality Permit GVA 1197 (West Coast Reduction Ltd.), which details the uselessness of the resulting data and the futility of the costly exercise.

The final step in calculating fees is to assign a cost to the base comparison substance, Hydrogen Sulphide (H_2S). The rationale for the assigned cost of $2/kg is not clear.

It's hard to imagine a more unnecessarily complex, opaque, and unscientific regulation. It is reminiscent of a Rube Goldberg machine. A machine intended to achieve a simple task by way of the most complex and convoluted mechanism possible. A mechanism so complicated that its only conceivable purpose is to showcase the cleverness of its designer.

Where the Bylaw differs from a Rube Goldberg machine is in the fact that a Rube Goldberg machine ultimately accomplishes its simple task.

The Solution

The solution to the problems with Bylaw 1330 is to amend it in a way that removes the underlying flawed theories:

1. Remove Schedule B in its entirety.
2. Remove all reference to Odorous Air Contaminants, Odour Detection Thresholds and Odour Units.
3. Devise a method of apportioning reasonable and transparent administrative costs related to odorous emissions between the respective permit holders that uses accepted mainstream methods to measure standard air emission parameters such as Total Reduced Sulphur and/or Total Volatile Organic Compounds.

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Permitting Implications

While this consultation process is about Bylaw 1330, it cannot be overlooked that the Bylaw necessitates permit terms without which fees could not be assessed. In other words, permits have been written to require the measurement of substances that support the calculation of fees set out in the Bylaw.

Along with the amendments to the Bylaw suggested here, these resulting permit terms that would no longer serve a purpose, should be removed from all permits.

Moving Forward

The changes to the Bylaw and permits proposed here are very different from the amendments that are proposed by Metro Vancouver staff and may seem like radical steps. They are in fact simply the undoing of radical missteps taken in 2021.

To avoid missteps like these in the future, it's important to ensure Metro Vancouver directors have the benefit of all relevant background on issues they are asked to decide on. In this case it may have been helpful for the directors to know that the question of the usefulness and appropriateness of Odour Units, and therefore Odour Detection Thresholds, has been answered. Since 2007, when Odour Units were first introduced in a Metro Vancouver permit, BC taxpayers have paid for the Environmental Appeal Board to hear multiple lengthy and expensive appeals centered on that question, appeals that also cost industry and Metro Vancouver millions of dollars. In every case the Environmental Appeal Board has decided that Odour Units, due to their subjective and unreliable nature, are not suitable for use as a compliance measure or fee mechanism.

We would hope that, while the Environmental Appeal Board's authority does not extend to the Metro Vancouver Board's decisions, the Board would recognize and respect the validity of the Environmental Appeal Board's decisions.

Sincerely,

West Coast Reduction Ltd.

Ken Ingram
Director of Technical & Environmental Services
[redacted]

Appendix 3:
Proposed Amendments to Air Quality Management Fees Bylaw:
Engagement Correspondence Received after August 30, 2025

Affected Public

- Resident – January 21, 2026
- Resident – March 25, 2026
- Resident – March 26, 2026

Affected Regulated Community

- Joint Submission from Industry – October 20, 2025
- Cement Association of Canada – October 23, 2025
- Cement Association of Canada – January 8, 2026
- Pure Sunfarms / Village Farms Canada – March 12, 2026
- Amrize Canada – March 13, 2026
- Superior Poultry Processors Ltd. – March 17, 2026
- Heidelberg Materials Canada Limited – March 20, 2026
- Joint Submission from Industry – March 30, 2026

Health Authorities

- Vancouver Coastal Health – October 22, 2025
- Fraser Health – January 12, 2026
- Fraser Health – March 18, 2026

Letters have been appended in chronological order.

October 20, 2025

Sent by email:
Esther.Berube@metrovancouver.org

Metro Vancouver
Head Office - Metrotower III
4515 Central Boulevard
Burnaby, B.C. V5H 0C6

Attention: Esther Berube - Division Manager, Air Quality Bylaw and Regulation Development, Metro Vancouver

Dear Ms. Berube:

Re: **Proposed Amendments To Air Quality Management Fees Bylaw 1330, 2021**

The undersigned represent businesses that have prominent roles in the BC economy from numerous sectors, including energy, waste management, construction, and food production. Not only do we play a critical role in furthering important provincial agendas related to food and energy security, affordable housing and climate change, these companies are responsible for billions of dollars of economic activity and thousands of jobs in the province.

In its current form, Bylaw 1330 is unclear, unnecessarily complex and lacks transparency. These fundamental issues create uncertainty and unpredictability in the application of the bylaw which ultimately creates barriers to growth and investment in our sectors and impairs regional competitiveness.

The amendments proposed do not address the fundamental issues with the Bylaw and warrant a complete and thorough review both internally and then with external stakeholders.

At a minimum, we respectfully request that Metro Vancouver consider adopting the following in their amendments:

1. Delete all references to Odour Units, Odorous Air Contaminants and Odour Detection Thresholds in the Bylaw
2. Delete Schedule B from the Bylaw
3. Develop a fee schedule based on a transparent accounting of the costs it seeks to recover and proportionate to a permit holder's emissions as determined by the measurement of an accepted, standard and representative air contaminant.
4. Conduct a detailed and transparent consultation with all air quality permit holders on the new proposed fee schedule.

We also request the opportunity to comment on any response to the current consultation process prior to its presentation to the Air Quality Committee.

Thank you,

[Signatories Page Follows]

Proposed Amendments To Air Quality Management Fees Bylaw 1330, 2021
Joint Submission to Metro Vancouver
October 20, 2025

West Coast Reduction Ltd.

Ken Ingram
Director of Technical and Env. Services

BC Salmon Farmers

Brian Kingzett (Oct 20, 2025 13:28:20 PDT)

Brian Kingzett
Executive Director

Hallmark Farms

Ron Pollon (Oct 20, 2025 13:49:32 PDT)

Ron Pollon
General Manager

Amrize

Stephanie Voysey (Oct 20, 2025 16:15:49 PDT)

Stephanie Voysey
Head of Environment, Canada Cement

GFL

Lee St. Arnaud (Oct 23, 2025 16:23:55 MDT)

Lee St Arnaud
Area Vice President, Solid Waste West

Skretting

Trevor Stanley (Oct 20, 2025 13:47:33 PDT)

Trevor Stanley
Managing Director, Skretting North America

BC Agriculture Council

Danielle Synotte (Oct 20, 2025 14:49:58 PDT)

Danielle Synotte
Executive Director

cc:

Honourable Tamara Davidson, BC Minister of Environment	ENV.Minister@gov.bc.ca
Honourable Lana Popham, BC Minister of Agriculture and Food	AF.Minister@gov.bc.ca
Honourable Ravi Kahlon, BC Minister of Jobs and Economic Growth	JEDI.Minister@gov.bc.ca
Jerry Dobrovolny, Commissioner/CAO, Metro Vancouver	Jerry.dobrovolny@metrovancouver.org
Lisa Dominato, Chair, Metro Vancouver Air Quality and Climate Committee	clrdominato@vancouver.ca

Vancouver Coastal Health

Office of the Chief Medical Health Officer

#800 - 601 West Broadway
Vancouver, BC V5Z 4C2
Telephone: 604-675-3900
Fax: 604-731-2756

October 22, 2025

Conor Reynolds, Director, Air Quality & Climate Action Services
Metro Vancouver
Delivered electronically to: conor.reynolds@metrovancouver.org
Cc: AQbylaw@metrovancouver.org

Re: Proposed amendments to Metro Vancouver's Air Quality Management Fees Bylaw No. 1330

Dear Conor Reynolds:

I am writing in my role as a Medical Health Officer for communities within the Metro Vancouver area, regarding the proposed amendments to Metro Vancouver's *Air Quality Management Fees Bylaw No. 1330*, specifically regarding fees for odorous air contaminants. Following careful public health review by our Vancouver Coastal Health program, I am pleased to provide the comments and recommendations below for your consideration.

Odorous air contaminants, while not always directly linked to acute toxicological effects, can have impacts on individual and community wellbeing, mental health, and quality of life. Exposure to unpleasant odours is associated with annoyance and anxiety and the level of impact is associated with a variety of symptoms. In addition, residents experiencing odours frequently report behavioral changes that create impediments to healthy living. These include reduced use of outdoor spaces such as backyards and parks, avoiding neighbourhood walks and active transportation, and barriers to opening home windows for cooling purposes during warm weather.

The *Smell Vancouver* app is a community-driven tool that enables residents to report and track odours throughout the region. It captures information on how these odours affect daily activities and allows users to log related health symptoms. The actions taken by users in response to odours illustrates how odours can interfere with local residents' daily lives:

- **Heat-health risk**: 43% of users responded to odours by closing windows or using air purifiers. Closing windows limits natural ventilation and could lead to increases in indoor temperatures and heat-related health risks.
- **Mental health and wellbeing**: Going indoors to escape odours (reported by 26% of users) can reduce opportunities for social interaction and access to outdoor environments critical for mental health and wellbeing.
- **Physical activity**: 10% of users reporting stopping exercise in response to odours, leading to physical activity reductions.

Recommendations

Given the wellbeing and quality of life impacts of odorous air contaminants, I recommend the following regarding the fee adjustments for odours air contaminants:

1. Consider the burden of odours on the health and wellbeing of affected communities, ensuring that fees contribute to effective incentives to reduce odorous emissions.
2. Maintain a robust monitoring and enforcement approach to address sources of odorous emissions.
3. Continue to integrate community-sourced data[1,2] (such as the *Smell Vancouver* app) into monitoring of odours air contaminants, complementing traditional air quality monitoring, to ensure that emission permitting and enforcement addresses community concerns.

Vancouver Coastal Health

Office of the Chief Medical Health Officer

#800 - 601 West Broadway
Vancouver, BC V5Z 4C2
Telephone: 604-675-3900
Fax: 604-731-2756

I appreciate your attention to the role of regulatory fees as an important tool to protect health and wellbeing for all residents in Metro Vancouver. Thank you for considering this public health perspective as you review the proposed amendments.

Sincerely,

Michael Schwandt, MD MPH FRCPC
Medical Health Officer, Vancouver Coastal Health

References:

1. Bhandari et al (2024) Odor, Air Quality, and Well-being: Understanding the Urban Smellscape Using Crowd-Sourced Science. Available at: https://iopscience.iop.org/article/10.1088/2752-5309/ad5ded
2. Eykelbosh et al (2021) Elucidating the Community Health Impacts of Odours Using Citizen Science and Mobile Monitoring. Available at: https://pubs.ciphi.ca/doi/10.5864/d2021-010

Cement Association of Canada

October 23, 2025

Dear Members of the Air Quality and Climate Committee,

On behalf of the Cement Association of Canada (CAC), I am writing to you today regarding our **serious concerns with the proposed amendments to the Metro Vancouver Regional District (MVRD)'s Air Quality Management Fees Regulation Bylaw No. 1330, 2021.**

The CAC is the leading voice of Canada's cement industry, whose six member companies produce the cement, concrete and aggregates needed to build vital housing and infrastructure and create economic growth in communities across the country, including Metro Vancouver and B.C.

B.C. has two cement plants, both located in the Metro Vancouver region, the Amrize (formerly Lafarge) facility in Richmond and the Heidelberg Materials facility in Delta. B.C.'s cement and concrete industry support more than 7,500 direct and indirect full-time jobs, contributing more than $700M annually to the economy through wages and salaries – with many of these benefits realized in Metro Vancouver. Approximately 90 per cent of the jobs in B.C.s cement and concrete industry are fulltime high-paying jobs, with hourly wages that exceed the total industry national average by 30 per cent.

We are deeply concerned that the proposed amendments related to permit fees will levy unjustified and onerous costs to cement plants, with limited transparency and certainty, at a time when it is more important than ever to protect Canadian and regional manufacturing.

Like energy, cement and concrete are strategic commodities upon which B.C.'s economy depends. B.C. can only maintain economic sovereignty by ensuring that it has a reliable domestic supply of cement and concrete to support the construction of infrastructure projects, including energy and electricity projects, roads and bridges, hospitals and schools, and homes.

In B.C., a significant portion of cement (estimated at more than 15% of total demand in 2024) used in the province is imported, primarily from countries like Vietnam with limited environmental and labour standards. As a result, the imported cement is priced to undercut domestic, locally produced cement by B.C. workers and companies who contribute to the economy.

Against the backdrop of increasing instability impacting global supply and demand, it is more critical than ever to **support local B.C. cement producers against unfair competition from jurisdictions with lower environmental, social and labour standards** by creating a competitive, fair, and predictable business environment.

British Columbia's industrial manufacturers need a level playing field to ensure that cheaper, carbon-intensive materials do not erode local, domestic, low-carbon manufacturing.

Proposed amendments to the MVRD's Air Quality Management Fees risk significantly exacerbating this pressure, to the detriment of the environment and B.C.'s economy. **Without adjustment, we are at even greater risk of displacing B.C. production and jobs with more polluting higher-carbon imports.**

While the cement industry appreciates the intent of the amendments to clarify and update definitions for permittees, the amendments **do not provide the needed transparency and certainty to protect B.C.'s cement industry**. In particular, the CAC is concerned regarding the permit fee ceiling of $450,000 for application fees for permits, approvals and amendments for businesses applying for authorization to discharge air contaminants. Cement plants already pay

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Ottawa, ON K1R 7S8

significant annual costs to comply with the existing by-law, and it is unclear how and or why a $450,000 application fee aligns with the stated cost recovery goals. Further, these increased compliance costs are being added in an already challenging competitiveness environment, driven by B.C.'s uniquely stringent industrial carbon price as well as unprecedented economic turmoil caused by the U.S.'s trade upheaval. The viability of cement manufacturing in the lower mainland is at risk.

To better illustrate the existing annual costs to comply with the by-law, please find historical costs paid from each facility below:

	Richmond (Amrize)	**Delta (Heidelberg)**
Air Permit Fee	$313,256 (2016) $279,179 (2017) $275,000 (2018) $264,952 (2019) $262,599 (2020) $262,713 (2021) $319,688 (2022) $378,978 (2023) $436,566 (2024) $493,073 (2025) Total fees paid, 2016-2025: **$3,286,009**	$446,167 (2016) $655,177 (2017) $655,616 (2018) $475,177 (2019) $659,539 (2020) $659,539 (2021) $788,328 (2022) $930,258 (2023) $1,062,889 (2024) $1,196,298 (2025) Total fees paid, 2016-2025: **$7,523,995**
Annual spend on air emissions testing	$95,000 (2016) $94,502 (2017) $110,898 (2018) $245,000 (2019) $117,638 (2020) $82,285 (2021) $350,241 (2022) $449,804 (2023) $159,793 (2024) $119,085 (2025) Total fees paid, 2016-2025: **$1,579,492**	$100,000 (2016) $103,000 (2017) $106,090 (2018) $109,272 (2019) $112,550 (2020) $115,927 (2021) $119,405 (2022) $122,987 (2023) $126,677 (2024) $130,477 (2025) Total fees paid, 2016-2025: **$1,146,388**
Permit renewal	$450,000 (expected, 2028)	$450,000 (expected)
Other Facility Permit Costs (outside of BC)	Exshaw (Alberta) – No fee Bath (Ontario) – No fee St. Constant (Quebec) - $153,000 Brookfield (Nova Scotia) - $8,791 *No permit renewal fees for any of the above plants	Edmonton (Alberta) - $30,000 Picton (Ontario) - $18,000
Additional information	Amrize has informed MVRD that if the air modelling shows	

	we cannot meet the ambient air quality standards for NOx, we will commit to the installation of SNCR. This is likely a $3-5M spend for the facility, along with operating costs (likely $100-200k annually).	

Therefore, we request that the following changes be made before the proposed amendments move forward:

1. **Eliminate the application fee to preserve competitiveness and attractiveness for foreign direct investment within the region.** Given that Metro Vancouver is unique in requiring both an annual emissions fee, a provincial industrial carbon price and a significant permitting fee, capping the limit at a meaningfully lower level would be better aligned with the region's goals to attract and preserve building materials manufacturing activity.

2. **Increase transparency regarding the use of annual emissions fees,** including how they relate to cost-recovery and contribute to abating emissions.

3. **Ensure fairness and transparency with respect to establishing term lengths for permits.** The CAC understands that Metro Vancouver began establishing expiry dates for permits over the last decade, and that decisions on term lengths for permits are made on a case-by-case basis. This could lead to unfairness and uncertainty for large plants, further damaging the investment environment in the region.

Against the backdrop of increasing instability impacting global supply and demand and rising competition from peer jurisdictions for foreign direct investment, it is critical to ensure that Metro Vancouver remains an attractive and viable destination for modernization and investment throughout the materials sector.

We appreciate the time you have taken to consult with us and for the opportunity for us to provide our feedback. We are available to discuss our recommendations further: please contact Adam Auer, President and CEO of the CAC [redacted]

Sincerely,

Adam Auer
President & CEO,
Cement Association of Canada

CC:

Hon. Ravi Kahlon
Minister of Jobs and Economic Growth
PO Box 9071 Stn Prov Govt
Victoria BC
V8W 9E2

Hon. Tamara Davidson
Minister of Environment and Parks
PO Box 9047 Stn Prov Govt
Rm 112, Parliament Buildings
Victoria BC
V8W 9E2

Kevin Jardine
Deputy Minister, Environment and Parks
PO Box 9339 Stn Prov Govt
Victoria BC
V8W9M1

Fazil Mihlar
Deputy Minister, Jobs and Economic Growth
PO Box 9846 Stn Prov Govt
Victoria BC
V8W9T2

Cement Association of Canada

January 8, 2026

Dear Members of the Air Quality and Climate Committee,

On behalf of the Cement Association of Canada (CAC), I am writing to you today to provide additional comments following our earlier letter in October 2025 regarding the proposed amendments to the Metro Vancouver Regional District (MVRD)'s Air Quality Management Fees Regulation Bylaw No. 1330, 2021.

The CAC is the leading voice of Canada's cement industry, whose six member companies produce the cement, concrete and aggregates needed to build vital housing and infrastructure and create economic growth in communities across the country, including Metro Vancouver and B.C.

B.C. has two cement plants, both located in the Metro Vancouver region, the Amrize (formerly Lafarge) facility in Richmond and the Heidelberg Materials facility in Delta. B.C.'s cement and concrete industry support more than 7,500 direct and indirect full-time jobs, contributing more than $700M annually to the economy through wages and salaries – with many of these benefits realized in Metro Vancouver. Approximately 90 per cent of the jobs in B.C.s cement and concrete industry are full time high-paying jobs, with hourly wages that exceed the total industry national average by 30 per cent.

Like energy, cement and concrete are strategic commodities upon which B.C.'s economy depends. Against the backdrop of increasing instability impacting global supply and demand and rising competition from peer jurisdictions for foreign direct investment, it is critical to ensure that Metro Vancouver remains an attractive and viable destination for modernization and investment throughout the materials sector.

In our earlier correspondence, we expressed our concerns that the proposed amendments related to permit fees would levy unjustified and onerous costs to cement plants. At the time, the proposed regulations from the MVRD would have set a $450,000 application fee limit cap, far surpassing comparator jurisdictions across North America, and raising serious issues regarding the ongoing competitiveness of British Columbia's cement manufacturing sector.

We are pleased to update that following engagement with several members of this committee, members of the MVRD's Air Quality and Climate Action Services department, and with various officials within the Government of British Columbia, the Cement Association of Canada and our members have been made aware of updates to the original proposed regulations.

We understand that under the updated proposed amendments that your committee is considering, adjustments to permit applications from a facility with an expiring permit would be **capped at $125,000**, significantly decreased from the earlier proposal of $450,000.

As a result, the **Cement Association of Canada and our members are supportive of the updated proposed amendments to the Metro Vancouver Regional District (MVRD)'s Air Quality Management Fees Regulation Bylaw No. 1330, 2021**.

We appreciate the quick and thoughtful engagement of members of this committee, as well as with the MVRD to ensure that the proposal protects important domestic manufacturing.

We are available to discuss further should you have any questions: please contact me, Sarah Petrevan, Vice President of Industrial Decarbonization and Sustainability for the CAC at [redacted]

Concrete building for life.

1105-350 Sparks Street,
Ottawa, ON K1R 7S8

cement.ca

Sincerely,

Sarah Petrevan
Vice President, Industrial Decarbonization and Sustainability
Cement Association of Canada

fraserhealth
Better health.
Best in health care.

January 12th, 2026

Metrotower III
4515 Central Boulevard
Burnaby, BC V5H 0C6

Re: Proposed amendments to Metro Vancouver's Air Quality Management Fees Bylaw No. 1330

Dear Conor Reynolds:

As a Medical Health Officer for Fraser Health, I appreciate the opportunity to provide feedback on the proposed amendments to the Air Quality Management Fees Bylaw No. 1330, particularly regarding the changes proposed to fees for Odorous Air Contaminants (OACs). A structured permit fee system that incentivizes emissions reductions, including odours, is an important step in addressing ongoing concerns associated with odour producing activities.

Odour complaints remain the most common type of air quality-related concern received by Metro Vancouver.[i] At Fraser Health, we similarly receive complaints from members of the public about disruptive odours in their neighbourhoods. These concerns reflect a broader expectation that local authorities will take meaningful action to address environmental nuisances that affect daily life.

Exposure to odours is not always directly linked to specific health effects, but some studies have reported associations with increased risk of symptoms such as headaches and cough/phlegm.[ii] Even in the absence of measurable toxic outcomes, odours can have important impacts on health and wellbeing.

[i] Metro Vancouver. Odour. Metro Vancouver; 2024. Available from: https://metrovancouver.org/services/environmental-regulation-enforcement/air-quality-regulatory-program/odour

[ii] Guadalupe-Fernandez V, De Sario M, Vecchi S, et al. Industrial odour pollution and human health: a systematic review and meta-analysis. Environ Health. 2021;20(1):108. doi:10.1186/s12940-021-00774-3

Medical Health Officer
Fraser Health

400 – 13450 102nd Avenue
Surrey, BC V3T 0H1 Canada

Tel:(604)-930-5404
Fax:(604)-930-5414
www.fraserhealth.ca

2023 BC's Top Employers

Exposure to odours can discourage the use of outdoor spaces, which in turn can reduce opportunities for physical activity and social connection.[iii] Odours may also inadvertently increase exposure to other environmental hazards, such as during periods of extreme heat when residents may keep windows closed to avoid odours, making it more difficult to cool their homes.[iii]

An effective odour management program that includes a structured permit fee system can help strengthen public confidence that concerns about odours are being taken seriously, and that environmental hazards are being appropriately managed, while also encouraging emission reductions. Our Environmental Health Protection team at Fraser Health appreciates the work being done at Metro Vancouver to strengthen the management of OACs and support health and wellbeing in our communities.

Sincerely,

Emily Newhouse MD, CM, MPH, FRCPC
Medical Health Officer – Medical Director
Population and Public Health
Fraser Health

[iii] Eykelbosh A, Maher R, de Ferreyro Monticelli D, Ramkairsingh A, Henderson S, Giang A, et al. Elucidating the community health impacts of odours using citizen science and mobile monitoring. Environ Health Rev. 2021;64(2):24-27. doi:10.5864/d2021-010

From: [redacted]
To: Metro Vancouver Air Quality Bylaws
Subject: Re: Engagement Update: Proposed Amendments to Air Quality Management Fees in Metro Vancouver
Date: Wednesday, January 21, 2026 4:03:52 AM
Attachments: image003.png
image004.png
image005.png
image006.png
image007.png

Hi Esther,

This exchange has ended up being quite an education for me and I have appreciated the helpful responses, with references to relevant material.

I remain concerned about the impact on emission reductions of the major reduction to fees, but was glad to see that concern reflected in the report to the Committee on feedback.

Once again, thank you
[redacted]

From: Julia Cameron [redacted]
Sent: Thursday, March 12, 2026 4:50 PM
To: Gaurav Singh <Gaurav.Singh@metrovancouver.org>
Cc: Esther Berube <Esther.Berube@metrovancouver.org>; Metro Vancouver Air Quality Bylaws <aqbylaw@metrovancouver.org>
Subject: RE: Update March 2026: Proposed Amendments to Air Quality Management Fees in Metro Vancouver

Thank you for sharing, Gaurav. Esther presented these at our last AAC meeting, which was very helpful.

Julia

Julia Cameron (she/her)
Vice President, Communications & Corporate Affairs, Village Farms Canadian Cannabis
[redacted]

From: Gaurav Singh <Gaurav.Singh@metrovancouver.org>
Sent: Thursday, March 12, 2026 4:35 PM
To: Julia Cameron [redacted]
Cc: Esther Berube <Esther.Berube@metrovancouver.org>; Metro Vancouver Air Quality Bylaws <aqbylaw@metrovancouver.org>
Subject: FW: Update March 2026: Proposed Amendments to Air Quality Management Fees in Metro Vancouver

Hi Julia,

I'm forwarding this message to you individually to ensure you received it, as it contains an update on the proposed amendments to Metro Vancouver's air quality management fees bylaw.

Please let us know if you would like to meet to discuss. Your written feedback is requested by March 26.

If you have any questions or comments, please contact Metro Vancouver staff at AQBylaw@metrovancouver.org or 604-432-6200 by March 26, 2026.

Best regards,

Gaurav Singh
Air Quality Planner, Air Quality & Climate Action Services
t. 604-436-6914

From: Metro Vancouver <AQBylaw@metrovancouver.org>
Sent: Thursday, March 12, 2026 3:30 PM
To: Gaurav Singh <Gaurav.Singh@metrovancouver.org>
Subject: Update March 2026: Proposed Amendments to Air Quality Management Fees in Metro Vancouver

Update on Air Quality Management Fees Regulation Bylaw No. 1330, 2021

Thank you to everyone who has provided feedback to date as we have worked to update the air quality management fees set out in MVRD Air Quality Management Fees Regulation Bylaw No. 1330, 2021 (MVRD Bylaw No. 1330, 2021).

Currently, staff are considering further adjustments in response to requests from the BC Government. You can find more information on the project webpage.

The current proposed updates are:

- Freeze all air contaminant fee rates at 2026 levels until December 31, 2028, once the proposed updates to fee rates described below have been incorporated

- Introduce application fee caps of
  - $110,000 for new permits and significant amendments and
  - $50,000 for authorizations for facilities with expiring permits
- Clarify and simplify odorous air contaminant rules, reduce some fee rates, and re-introduce the fee rate for total reduced sulphur compounds
- Clarify fee calculations
- Clarify definitions and align with provincial and federal legislation
- Review fees by the end of December 2028, and then every four years thereafter

Information on previous proposals is available on the project webpage, including the report to the January 16, 2026 meeting of Metro Vancouver's Air Quality Committee that was referred back to staff for further discussion with the Province.

Your input
Your feedback, along with research and consideration for competitiveness with other jurisdictions and current economic conditions, has contributed to the proposed updates.

Staff continue to listen to feedback on these proposals. **Please contact Metro Vancouver staff or share your comments via AQBylaw@metrovancouver.org or 604-432-6200 by March 26, 2026.**

Next steps
Proposed amendments will be brought forward to Metro Vancouver's Air Quality Committee and the Metro Vancouver Regional District Board. If adopted, the revised bylaw will apply going forward.

The proposed amendments are intended to improve clarity, predictability, fairness, and competitiveness of the fees, and align with the principles of emissions reduction, discharger-pay, and fair cost recovery. In addition, without these amendments, some facilities could be charged much higher fees under the current bylaw.

The Metro Vancouver region is an urban region, home to over half the population of British Columbia, and it is Metro Vancouver's legislated responsibility to regulate air quality to protect residents' health and the environment.

Contact us:

Project Website: Proposed Amendments to Air Quality Management Fees Bylaw
Email: AQBylaw@metrovancouver.org
Phone: 604-432-6200

Follow us:

Metro Vancouver is a diverse organization that plans for and delivers regional utility services, including water, sewers and wastewater treatment, and solid waste management. It also regulates air quality, plans for urban growth, manages a regional parks system, provides affordable housing, and serves as a regional federation. The organization is a federation of 21 municipalities, one electoral area, and one treaty First Nation located in the region of the same name. The organization is made up of four separate legal entities, each governed by its own Board of Directors. Board directors are elected officials from member jurisdictions.

From: Stephanie VOYSEY [redacted]
Sent: Friday, March 13, 2026 10:08 AM
To: Gaurav Singh <Gaurav.Singh@metrovancouver.org>
Cc: Esther Berube <Esther.Berube@metrovancouver.org>; Metro Vancouver Air Quality Bylaws <aqbylaw@metrovancouver.org>
Subject: Re: FW: Update March 2026: Proposed Amendments to Air Quality Management Fees in Metro Vancouver

Hi Gaurav

Thanks for sharing this update. At this time, we do not have any concerns in regards to the new proposed updates.

Cheers,
Stephanie

STEPHANIE VOYSEY, P.ENG.
Head of Environment, Canada Cement
[redacted]

Amrize Canada
2300 Rogers Avenue, Coquitlam, Canada, V3K 5X6
M: 6046909950
Amrize | LinkedIn | Facebook

On Thu, Mar 12, 2026 at 4:41 PM Gaurav Singh <Gaurav.Singh@metrovancouver.org> wrote:

Hi Stephanie,

I'm forwarding this message to you individually to ensure you received it, as it contains an update on the proposed amendments to Metro Vancouver's air quality management fees bylaw.

Please let us know if you would like to meet to discuss. Your written feedback is requested by March 26.

If you have any questions or comments, please contact Metro Vancouver staff at AQBylaw@metrovancouver.org or 604-432-6200 by March 26, 2026.

Best regards,

Gaurav Singh
Air Quality Planner, Air Quality & Climate Action Services
t. 604-436-6914

From: Metro Vancouver <AQBylaw@metrovancouver.org>
Sent: Thursday, March 12, 2026 3:30 PM
To: Gaurav Singh <Gaurav.Singh@metrovancouver.org>
Subject: Update March 2026: Proposed Amendments to Air Quality Management Fees in Metro Vancouver

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-

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Staff continue to listen to feedback on these proposals. **Please contact Metro Vancouver staff or share your comments via AQBylaw@metrovancouver.org or 604-432-6200 by March 26, 2026.**

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Contact us:

Project Website: Proposed Amendments to Air Quality Management Fees Bylaw
Email: AQBylaw@metrovancouver.org
Phone: 604-432-6200

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From: Melchor Pioquinto [redacted]
Sent: Tuesday, March 17, 2026 9:53 AM
To: Gaurav Singh <Gaurav Singh@metrovancouver.org>
Cc: Parmjit [redacted]
Subject: RE: Update March 2026: Proposed Amendments to Air Quality Management Fees in Metro Vancouver

Hello Gaurav,

We have reviewed the proposed amendments and the proposed updates listed in project webpage looks good. We have no further comment.

Regards,
Mel Pioquinto
Superior Poultry Processors Ltd.

From: Parmjit [redacted]
Sent: March 12, 2026 7:23 PM
To: Melchor Pioquinto [redacted]
Subject: Fwd: Update March 2026: Proposed Amendments to Air Quality Management Fees in Metro Vancouver

Sent from my iPhone

Begin forwarded message:

From: Gaurav Singh <Gaurav.Singh@metrovancouver.org>
Date: March 12, 2026 at 4:40:29 PM PDT
To: Parmjit [redacted]
Cc: Esther Berube <Esther.Berube@metrovancouver.org>, Metro Vancouver Air Quality Bylaws <aqbylaw@metrovancouver.org>
Subject: FW: Update March 2026: Proposed Amendments to Air Quality Management Fees in Metro Vancouver

Hi Parmjit,

I'm forwarding this message to you individually to ensure you received it, as it contains an update on the proposed amendments to Metro Vancouver's air quality management fees bylaw.

Please let us know if you would like to meet to discuss. Your written feedback is requested by March 26.

If you have any questions or comments, please contact Metro Vancouver staff at AQBylaw@metrovancouver.org or 604-432-6200 by March 26, 2026.

Best regards,

Gaurav Singh
Air Quality Planner, Air Quality & Climate Action Services
t. 604-436-6914

From: Metro Vancouver <AQBylaw@metrovancouver org>
Sent: Thursday, March 12, 2026 3:30 PM
To: Gaurav Singh <Gaurav.Singh@metrovancouver org>
Subject: Update March 2026: Proposed Amendments to Air Quality Management Fees in Metro Vancouver

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Your input
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Staff continue to listen to feedback on these proposals. **Please contact Metro Vancouver staff or share your comments via AQBylaw@metrovancouver.org or 604-432-6200 by March 26, 2026.**

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From: Newhouse, Emily Dr [redacted]
Sent: Wednesday, March 18, 2026 2:12 PM
To: Gaurav Singh <Gaurav.Singh@metrovancouver.org>
Cc: Esther Berube <Esther.Berube@metrovancouver.org>; Metro Vancouver Air Quality Bylaws <aqbylaw@metrovancouver.org>; Barn, Prabjit [FH] [redacted]
Subject: RE: Update March 2026: Proposed Amendments to Air Quality Management Fees in Metro Vancouver

Hello Gaurav,

Thank you for letting us know about the update on the proposed amendments to Metro Vancouver's air quality management fees bylaw.

Our original letter of feedback would still apply to this round of consultation; we do not have additional comments to offer at this time, but would appreciate the original feedback being noted.

Regards,

Emily Newhouse, MD, CM, MPH, FRCPC
Medical Health Officer and Medical Director, Population and Public Health, Fraser Health Authority
[redacted] 13450 – 102nd Avenue, Surrey, B.C. V3T 0H1
[redacted]

[redacted]

Fraser Health provides care on the traditional, ancestral and unceded territories of the Coast Salish and Nlaka'pamux Nations, and is home to 32 First Nations.

From: Gaurav Singh <Gaurav.Singh@metrovancouver.org>
Sent: Thursday, March 12, 2026 4:30 PM
To: Newhouse, Emily Dr [redacted]
Cc: Esther Berube <Esther.Berube@metrovancouver.org>; Metro Vancouver Air Quality Bylaws <aqbylaw@metrovancouver.org>
Subject: FW: Update March 2026: Proposed Amendments to Air Quality Management Fees in Metro Vancouver

Hi Emily,

I'm forwarding this message to you individually to ensure you received it, as it contains an update on the proposed amendments to Metro Vancouver's air quality management fees bylaw.

Please let us know if you would like to meet to discuss. Your written feedback is requested by March 26.

If you have any questions or comments, please contact Metro Vancouver staff at AQBylaw@metrovancouver.org or 604-432-6200 by March 26, 2026.

Best regards,

Gaurav Singh
Air Quality Planner, Air Quality & Climate Action Services
t. 604-436-6914

From: Metro Vancouver <AQBylaw@metrovancouver.org>
Sent: Thursday, March 12, 2026 3:30 PM
To: Gaurav Singh <Gaurav.Singh@metrovancouver.org>
Subject: Update March 2026: Proposed Amendments to Air Quality Management Fees in Metro Vancouver

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Your input

Your feedback, along with research and consideration for competitiveness with other jurisdictions and current economic conditions, has contributed to the proposed updates.

Staff continue to listen to feedback on these proposals. **Please contact Metro Vancouver staff or share your comments via AQBylaw@metrovancouver.org or 604-432-6200 by March 26, 2026.**

Next steps

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Contact us:

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Email: AQBylaw@metrovancouver.org
Phone: 604-432-6200

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Heidelberg Materials

Heidelberg Materials Canada Limited
Delta Cement Plant
7777 Ross Road
Delta, BC V4G 1B8

March 20, 2026

Metro Vancouver
Air Quality and Climate Action Services
Parks and Environment
4730 Kingsway
Burnaby, BC V5H 0G6

Attention: Esther Berube, P.Eng. Division Manager, Bylaw and Regulation Development
AQBylaw@metrovancouver.org

Subject: Proposed Amendments to Air Quality Management Fees in Metro Vancouver

Dear Ms. Berube,

Heidelberg Materials Canada Limited welcomes the revised March 2026 proposed amendments to Metro Vancouver's air quality management fees in Regulation Bylaw No. 1330, 2021. As a permit holder, we believe our concerns are being heard.

Metro Vancouver's proposal for the cap of $50,000 for the renewal of expiring permits is in line with Heidelberg Materials' recommendations. At the same time, it is assumed that the permit term is renewed for a reasonable length of time such as 10 years. With a long term renewed permit, the proposed fee cap would be considered competitive with other jurisdictions.

For the fee cap of $110,000 for new permits and/or significant amendments, we still find this cap excessive; however, it is an improvement from Metro Vancouver's previous revised proposal of $220,000. For new permit or significant amendment applications, the permittee would be expected to cover costs for studies such as air dispersion modelling. There may be expectations to install certain air emission monitors which the permittee would be expected to cover the costs of engineering and technical studies, installation, certification and long-term maintenance. Thus, with these additional costs, Heidelberg Materials continues to recommend that the cap be set at $50,000 as it was in pre-2021.

Heidelberg Materials

Heidelberg Materials supports Metro Vancouver's proposal to freeze all air contaminant fee rates at the 2026 rates until at least to the end of 2028. It should be noted that the fee rates apply to the permit emissions limits which are normally higher than what the actual emissions are. With the elimination in 2022 of the Measured Discharge Program (MDP), qualified permit holders lost the ability to recuperate a portion of our annual fees based on actual emissions versus permit limits. Although the freeze in the fee rates does not compensate for the removal of the MDP, it does provide some future financial savings.

Heidelberg Materials Canada Limited appreciates this opportunity to respond to Metro Vancouver's proposed amendments to the air quality management fees in Regulation Bylaw No. 1330, 2021.

Yours truly,

Eileen Jang, P.Eng.
Environmental Manager

cc: Pascal Bouchard, Plant Manager, Heidelberg Materials Canada Limited
Gaurav Singh, Air Quality Planner, Air Quality & Climate Action Services, Metro Vancouver

From: [redacted]
To: Metro Vancouver Air Quality Bylaws
Subject: Feedback on by-law amendments
Date: Wednesday, March 25, 2026 4:16:53 PM

Hello,

I am writing to provide comments on the proposed amendments to Bylaw No. 1330, 2021. The by-law should be amended to significantly increase the costs and penalties available for odour emitters in the East Side of Vancouver -- most specifically: West Coast Reduction (WCR). The WCR plant located near the port releases a revolting stench from the processing of animal products. While the plant operates year round, the smells are most noticeable -- indeed, almost ever present -- during the warmer spring and summer months. For some reason -- be it the heating of animal waste or the venting of the processing plant itself on sunny days -- the smells from the WCR plant are most unpleasant during precisely those times when Vancouverities want to spend time outdoors.

The effect on my quality of life and enjoyment of my property is severe. The smell of rotten, decomposing animal byproduct is inescapable in East Vancouver. It hangs live a disgusting fog throughou the day. I smell it while walking in the neighbourhood, working in my garden, doing exercise, etc. It is not confined to outdoors -- any time a window is open (a common thing during warm months), the revolting smell takes over my house. The smells make me very upset. They cause nauseau, discomfort, the inability to relax, etc. They make me feel embarassed any time I have friends or family over. The smell pervades all over the neighbourhood. It severely diminishes quality of life and the ability to enjoy one's property and public spaces (such as parks and schools). [redacted] and I often think how distracting and horrible it must be to try to study and concentrate on one's studies surrounded by revolting animal by-product smells.

Vancouverites in Kits or Point Grey would never have to stand for this nonsense. East Van residents, by contrast, are subjected to a constant disgusting miasma that denies them the ability to enjoy the outdoors.

WCR is a horrible presence in our city. Frankly, the plant should be closed and moved. We dont allow pulp mills or coal plants down at the port any longer because of noxious odours and smoke; the same logic should lead to the closure of that awful WCR plant.

But short of closure, WCR and the other terrible odour emitters in East Van should AT LEAST be required to control their odours more and pay penalties when they fail to do so.

I IMPLORE YOU TO INCREASE PENALTIES FOR ODOUR EMITTERS AND MAKE IT MORE EXPENSIVE AND DIFFICULT TO CAUSE SMELL POLUTION.

Pleae do not hesitate to contact me if you need anything further from me.

[redacted]

From: [redacted]
To: Metro Vancouver Air Quality Bylaws
Subject: Re: Proposed Amendments to Air Quality Fees Bylaw
Date: Friday, March 27, 2026 7:35:54 PM
Attachments: image001.png

Hi, thanks for the response. The odour is not coming from Parallel 49, that was just a landmark of around where I[redacted]. The smell is from the chicken processing plant.
Thanks

On Fri, Mar 27, 2026 at 4:54 PM Metro Vancouver Air Quality Bylaws <aqbylaw@metrovancouver.org> wrote:

> Hi[redacted]
>
> Thank you for taking the time to write and for sharing your comments regarding the proposed amendments to *Air Quality Management Fees Regulation Bylaw No. 1330, 2021*. We acknowledge receipt of your submission.
>
> Your feedback will be included in the engagement summary and brought forward to Metro Vancouver's Air Quality Committee and the Metro Vancouver Regional District Board for consideration, along with other comments received during the engagement. Information identifying you as the source will be blacked out.
>
> To help us better understand the source of your concerns, could you please clarify the odours that are of concern to you? In particular, are these odours ones you believe may be originating from the Parallel 49 Brewing facility, or from other sources in the area?
>
> Further, If you are interested in receiving updates about Metro Vancouver's air quality and climate action work, including updates related to odour management, you may subscribe to the Air Quality and Climate Action mailing list and select the topic "managing odours" here: Air Quality and Climate Action Mailing List | Metro Vancouver.
>
> Best regards,
>
> Gaurav Singh
> **Air Quality Planner**, Air Quality & Climate Action Services
> t. 604-436-6914
> metrovancouver
> SERVICES AND SOLUTIONS FOR A LIVABLE REGION
>
>

From: [redacted]
Sent: Thursday, March 26, 2026 7:12 PM
To: Metro Vancouver Air Quality Bylaws <aqbylaw@metrovancouver.org>
Subject: Proposed Amendments to Air Quality Fees Bylaw

I've [redacted] near Parallel 49 [redacted] and originally the smell would just occur in my area in the summer when the winds blew a certain direction. Each year the odours have become progressively worse. It is happening outside the summer months and the days are more numerous each year. It deters me from opening windows, going outside and is a barrier to going to local businesses.

With the problem getting worse, I believe it's a bad time to introduce rate cut and caps. Businesses should be financially rewarded when odours lessen. As the problem worsens, the cuts and caps remove incentives to do more to mitigate the issue. Several condo buildings are being built in my neighbourhood and this problem with be affective more and more people.

Thanks for your information and the opportunity to give our input

[redacted]

March 30, 2026

Sent by email:
CLRdominato@vancouver.ca; mlahti@portmoody.ca
dmarsden@coquitlam.ca; areaajen@gmail.com
tbaillie@tol.ca; Bill.McNulty@richmond.ca
mayor.berry@lionsbay.ca; jross@belcarra.ca
jdueck@mapleridge.ca; druimy@mapleridge.ca
doug.elford@surrey.ca; rwallace@langleycity.ca
alison.gu@burnaby.ca; lwatt@westvancouver.ca

Air Quality Committee
Metro Vancouver
Head Office - Metrotower III
4515 Central Boulevard
Burnaby, B.C. V5H 0C6

Attention: **Members of the Air Quality Committee, Metro Vancouver**

Dear Members of the Air Quality Committee and Chair Dominato,

Re: **Air Quality Management Fees Regulation Bylaw**

We write on behalf of industrial permit holders operating across the Metro Vancouver region to thank the Committee for its considered discussion on January 16 regarding the proposed amendments to the *Air Quality Management Fees Regulation Bylaw*, and to request more detail on the most recent amendments proposal before it is considered again by the Committee.

As several Committee members noted during the January 16 meeting, the magnitude, complexity, and pacing of the proposed air emissions fee increases — including annual emission fees as well as permit application and re-application fees — warrant additional time and clarity to ensure the framework is proportionate, defensible, and appropriately aligned. We appreciate the Committee's focus on ensuring this framework is right before it is advanced further.

During the January 16 discussion, committee members raised concerns that resonate across a wide range of permitted industries, including:

- the justification for significant fee increases across all air contaminants;
- the complexity of the fee calculation mechanism;
- the continued escalation of air permit application and renewal fees; and,
- the potential implications for regional competitiveness and business retention.

Councillors also emphasized the importance of provincial alignment, particularly given Metro Vancouver's role as a delegated authority in this area.

Shared Community and Environmental Interests

Industry members are also residents of Metro Vancouver. Our employees and their families live and work in the same communities that MVRD serves, and we share the Committee's commitment to protecting air quality, public health, and quality of life. Industry, therefore, supports strong, *science-based environmental regulation*. At the same time, regulatory frameworks are most effective when they are transparent in their rationale, proportionate in their outcomes, and aligned with provincial and national approaches. Consistency across jurisdictions supports regulatory confidence, environmental effectiveness, and informed long-term investment decisions.

Economic Contribution of Permitted Industry

Industrial permit holders subject to the Air Quality Management Bylaw are an integral part of British Columbia's economy. Collectively, our members:

- employ thousands of workers;
- generate billions of dollars in annual economic activity; and,
- support extensive local supply chains, skilled trades, and workforce development.

A predictable, transparent, and proportionate air quality regulatory regime is essential to sustaining these contributions and supporting continued investment in emissions reduction and environmental performance.

Substantive Issues Remain Unresolved

While industry acknowledges the effort made by staff to adjust certain elements of the proposed bylaw, the fundamental concerns raised in previous correspondence from industry and the Province remain unresolved.

The most recent bylaw amendments proposal was shared with some permittees, in summary form, on March 12, and a small excerpt of the draft bylaw was later provided. Together, these documents do not provide sufficient detail to allow for substantive comment; in fact, they raise more questions than they answer about the details and potential impact of the new proposed amendments.

It is our understanding that in the normal course of the bylaw amendment process, as we have seen, the full text of the proposed amendments would only be available for comment when it is included in a published committee agenda. This usually gives stakeholders less than a week to review and comment. We also understand from staff that they are not able to share the full text of the bylaw sooner.

Given the complexity of this bylaw and the proposed amendments, the potential impact to the regional economy, and the protracted amendment proceedings thus far, we respectfully request that:

- The Committee provide staff with the direction and/or authority necessary to allow them to share the full text of the proposed bylaw amendments;
- The full text be shared with all Air Quality permit holders, not just the handful described as "odour permits";
- At least 30 days be given for review and comment; and
- The full content of the comments received be included in the final report for the Committee to consider.

We remain committed to constructive engagement and stand ready to provide technical expertise and practical insight to support the development of an air quality regulatory framework that is effective, aligned, and economically sustainable.

We hope the Committee sees the value of taking the time to get this right.

Respectfully,

[Signatories Page Follows]

West Coast Reduction Ltd.

Ken Ingram
Director of Technical and Env. Services

BC Salmon Farmers

Brian Kingzett (Mar 30, 2026 09:19:41 PDT)

Brian Kingzett
Executive Director

Hallmark Farms

Ron Pollon (Apr 1, 2026 08:48:48 PDT)

Ron Pollon
General Manager

BC Agriculture Council

Danielle Synotte
Executive Director

GFL

Lee St. Arnaud (Mar 31, 2026 13:14:38 MDT)

Lee St. Arnaud
Area Vice President, Solid Waste West

Skretting

Trevor Stanley (Mar 30, 2026 13:46:24 ADT)

Trevor Stanley
Managing Director, Skretting North America

BC Food & Beverage

James Donaldson
CEO

cc:

Honourable Tamara Davidson, BC Minister of Environment	ENV.Minister@gov.bc.ca
Honourable Lana Popham, BC Minister of Agriculture and Food	AF.Minister@gov.bc.ca
Honourable Ravi Kahlon, BC Minister of Jobs and Economic Growth	JEDI.Minister@gov.bc.ca

Blacklined Unofficial Consolidation of MVRD Bylaw No. 1330, 2021

METRO VANCOUVER REGIONAL DISTRICT
BYLAW NO. ~~1330~~1440, ~~2021~~2026
A Bylaw to Regulate Air Quality Management Fees

WHEREAS:

A. The Board of the Metro Vancouver Regional District has enacted ~~the "~~*Greater Vancouver Regional District Air Quality Management Bylaw No. 1082, 2008*~~"~~; and

B. ~~That Bylaw~~ Greater Vancouver Regional District Air Quality Management Bylaw No. 1082, 2008 contemplates the establishment and payment of fees.

NOW THEREFORE the Board of the Metro Vancouver Regional District enacts as follows:

Citation

1. The official citation of this bylaw is *"Metro Vancouver Regional District Air Quality Management Fees Regulation Bylaw No. ~~1330, 2021~~1440, 2026".* This bylaw may be cited as "Metro Vancouver Regional District Air Quality Management Fees Regulation Bylaw" (in this ~~B~~bylaw, "this Regulation").

Repeal of Bylaw

~~1.~~**2.** "Metro Vancouver Regional District Air Quality Management Fees Regulation Bylaw No. 1330, 2021" and all amendments thereto are repealed.

Schedules

~~2.~~**3.** The following ~~S~~schedules are attached to and form part of this Regulation:

~~Schedule "A-1", Calculation of Air Contaminant Emission Fees until December 31, 2021;~~
~~Schedule "A-2", Calculation of Air Contaminant Emission Fees from January 1, 2022 to December 31, 2022;~~
~~Schedule "A-3", Calculation of Air Contaminant Emission Fees from January 1, 2023 to December 31, 2023;~~
~~Schedule "A-4", Calculation of Air Contaminant Emission Fees from January 1, 2024 to December 31, 2024;~~
~~Schedule "A-5", Calculation of Air Contaminant Emission Fees from January 1, 2025 to December 31, 2025;~~

- Schedule ~~"~~A-~~6~~1~~"~~, Calculation of Air Contaminant Emission Fees from ~~January 1~~April 24, 2026 to December 31, ~~2026~~2028;

~~Schedule "A-7", Calculation of Air Contaminant Emission Fees from January 1, 2027 to December 31, 2027;~~
~~Schedule "A-8", Calculation of Air Contaminant Emission Fees for January 1, 2028 and later; and~~

- Schedule A-2, Calculation of Air Contaminant Emission Fees from January 1, 2029 to December 31, 2029;
- Schedule A-3, Calculation of Air Contaminant Emission Fees for January 1, 2030 and later; and;

~~Schedule "B", Calculation of Odorous Air Contaminant Emission Fees.~~

- Schedule B, List of Hazardous Air Pollutants.

General

~~3.~~**4.** This Regulation is deemed to be an integral part of the Greater Vancouver Regional District Air Quality Management Bylaw No. 1082, 2008 ("the Bylaw").

~~4.~~**5.** Terms defined in the Bylaw, or incorporated by reference into the Bylaw, have the same meaning in this Regulation.

Definitions

~~5.~~**6.** In this Regulation:

~~"~~**"administrative amendment"**~~"~~ means an amendment to a permit or approval for any of the following purposes:

(a) a change of ownership or name; or
(b) a change of legal address or mailing address;

"authorized discharge" means:

(a) the quantity of an air contaminant that is authorized by a permit, approval, or emission regulation; or
(b) if the quantity of an air contaminant in the discharge is not specified in a permit, approval, or emission regulation, the quantity of the air contaminant that is:
    i. determined from discharge factors applied in accordance with procedures approved by the district director; or
    ii. measured, in accordance with procedures approved by the district director and further to a requirement in a permit, approval or emission regulation to measure the air contaminant;

"billion cubic metre odour unit~~s~~" means ~~the volume of an odorous air contaminant discharge such that the product of the odour concentration, in odour units, and the volume of the discharge, in cubic metres, is equivalent to~~ a volume of one billion cubic metres of gas ~~with~~ having an ~~odorous substance~~odour concentration of one odour unit per cubic metre of gas;

"coarse particulate matter" means particulate matter with an aerodynamic diameter greater than 2.5 micrometres, excluding diesel particulate matter and metals;

"coarse particulate matter containing soy dust" means coarse particulate matter containing soy;

"diesel particulate matter" means particulate matter that is ~~emitted~~discharged from the combustion of diesel fuel or an alternative diesel fuel;

"District" means the Metro Vancouver Regional District;

"European Reference Odour Mass" means a conventional quantity value for an odour unit, equal to a defined mass of a reference substance having known odorous properties, as referenced and used in the European Standard EN 13725:2022 ("Stationary source emissions - Determination of odour concentration by dynamic olfactometry and odour emission rate");

"farm business" has the same meaning as in section 1 of the *Farm Practices Protection (Right to Farm) Act*, RSBC 1996, c. 131;

"farm operation" has the same meaning as in section 1 of the *Farm Practices Protection (Right to Farm) Act*;

"fine particulate matter" means particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometres, excluding diesel particulate matter and metals;

~~*Replaced by Bylaw 1373, 2023*~~

"global warming potential" means the 100-year global warming potential of a greenhouse gas, as listed in the most recent Working Group 1 Contribution (The Physical Science Basis) to the most recent Assessment Report of the Intergovernmental Panel on Climate Change, all as corrected from time to time;

"greenhouse gases" means gases that have a global warming potential, and includes carbon dioxide, methane, and other greenhouse gases;

"hazardous air pollutants" means ~~air contaminants that:~~ substances introduced into the air that cause or may cause cancer, birth defects, or other major health impacts to humans or any life form, and are listed in Schedule B;

~~(a) meet the definition of toxic under the *Canadian Environmental Protection Act, 1999* (Canada) and listed in Schedule 1 of that Act (List of Toxic Substances) as amended from time to time, but not including greenhouse gases, ozone, respirable particulate matter less than or equal to 10 microns and air contaminants that are precursors to particulate matter formation (nitrogen oxides, sulphur dioxide, volatile organic compounds and ammonia); or~~

~~(b) are included in the United States *Clean Air Act*, United States Code Title 42, c. 85 § 7412(b) (1) (List of Hazardous Air Pollutants), as amended from time to time; or~~ *2011*

~~(c) as determined by the district director;~~

~~"~~**metals"**~~"~~ means metals that are not hazardous air pollutants~~, including aluminum, antimony, barium, boron, copper, iron, manganese, molybdenum, nickel, silver, tin, and zinc~~;

"minor amendment" means an amendment to a permit or approval for any of the following purposes:

(a) a decrease in the authorized quantity of the discharge, emission or stored material;

(b) an increase in the authorized quantity of the discharge, emission or stored material that does not exceed 10% of the authorized quantity;

(c) a change in the authorized quality of the discharge, emission or stored material such that, in the opinion of the district director, the change has or will have ~~less~~an equal or lesser impact on the environment;
(d) a change in a monitoring program; or
(e) a change to the works, method of treatment or any other condition of a permit or approval such that, in the opinion of the district director, the change has or will have ~~less~~an equal or lesser impact on the environment;

~~*Replaced by Bylaw 1373, 2023*~~

"non-photoreactive volatile organic compounds" means any volatile organic compounds~~:~~
~~(a)~~ , except methane, listed as exclusions under "Volatile organic compounds that participate in atmospheric photochemical reactions" in Schedule 1 (List of Toxic Substances, Part 2) of the *Canadian Environmental Protection Act, 1999*, S.C. 1999, c. 33, as amended from time to time~~, except methane; or~~
~~(b) as determined by the district director~~;

"odour concentration" means the number of odour units in a cubic metre of gas at standard conditions (at a temperature of 293 Kelvin (K) and normal atmospheric pressure of 101.3 kilo Pascals (kPa) on a wet basis), as specified in the European Standard EN 13725: 2022 ("Stationary source emissions - Determination of odour concentration by dynamic olfactometry and odour emission rate"), as amended from time to time;

"odorous air contaminant~~s~~" ~~means substances that individually or collectively are air contaminants~~ is a type of air contaminant, and means any substance that is discharged into the air that, due to ~~their~~its odorous properties;
(a) injures or is capable of injuring the health or safety of a person;
(b) injures or is capable of injuring property or any life form;
(c) interferes or is capable of interfering with the normal conduct of business;
(d) causes or is capable of causing material physical discomfort to a person; or
(e) damages or is capable of damaging the environment;

"odorous air contaminant sensitive receptor location" means a residential location, public space or commercial business location such as restaurants and retail operations where owners, operators, or occupants may suffer the impairment of enjoyment of private or public space or business loss due to the presence of odorous air contaminants;

~~**"odour detection threshold**" means the concentration at which an odour panel in accordance with European Standard EN 13725:2003 ("Air quality – determination of odour concentration by dynamic olfactometry"), as amended from time to time, or by a method approved by the district director, can just detect the presence of a substance;~~

"odour unit" means an amount of an odorous air contaminant, or odorous air contaminants, that, when evaporated into one cubic metre of neutral gas at standard conditions (at a temperature of 293 Kelvin (K) and normal atmospheric pressure of 101.3 kilo Pascals (kPa) on a wet basis), elicits a physiological response from a panel that is equivalent to that elicited by one

European Reference Odour Mass when evaporated into one cubic metre of neutral gas at standard conditions, all as determined in accordance with European Standard EN 13725:2003 ("Air quality – determination of odour concentration by dynamic olfactometry"), 2022 ("Stationary source emissions - Determination of odour concentration by dynamic olfactometry and odour emission rate"), as amended from time to time, or as otherwise approved by the district director;

"other greenhouse gases" means greenhouse gases including nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulphur hexafluoride, but does not include carbon dioxide and methane;

"photoreactive volatile organic compounds" means any volatile organic compounds:
(a) not defined in this Regulation as either hazardous air pollutants or non-photoreactive volatile organic compounds; or
(b) as determined by the district director;

"significant amendment" means an amendment to a permit or approval which is not an administrative amendment or a minor amendment; and

"total reduced sulphur (TRS)" means total one or more substances introduced into the air that contain one or more sulphur atoms in their reduced sulphur compounds, including but not limited to hydrogen sulphide, methyl mercaptan, dimethyl sulphide, and dimethyl disulphidestate.;

"volatile aldehydes" means volatile organic compounds containing a carbonyl group bonded to at least one hydrogen atom;

"volatile amines" means volatile organic compounds with a structure similar to ammonia where one or more hydrogen atoms are replaced with organic groups;

"volatile fatty acids" means volatile organic compounds containing a carbonyl group and a hydroxyl group bonded to the same carbon in a chain of seven or fewer carbon atoms;

"volatile ketones" means volatile organic compounds containing a carbonyl group bonded to two carbon atoms; and

"whole emission discharge of odorous air contaminants" means the total discharge of odorous air contaminants from an emission source in one year and is the product of the total odorous air contaminants in the discharge, as measured in accordance with European Standard EN 13725:2022 ("Stationary source emissions - Determination of odour concentration by dynamic olfactometry and odour emission rate"), as amended from time to time, expressed in odour units, multiplied by the total volume of the discharge, expressed in billion cubic metres.

Payment of Fees

6.**7.** Every person who applies for a permit or an approval, or any amendment of a permit or approval, must pay the application fees set out in this Regulation.

~~7.~~**8.** Every person who discharges air contaminants under an emission regulation, a permit, or an approval must pay the applicable annual or duration fees set out in this Regulation.

~~8.~~**9.** Emission fees are payable under this Regulation for emission fees related to the discharge of a greenhouse gas, unless the provincial carbon tax applies to the discharge of that greenhouse gas.

Calculation of Air Contaminant Emission Fees

10. ~~**"Air contaminant emission fees"** (Z)~~ The District will charge air contaminant emission fees ~~are the emission fees~~ calculated in accordance with~~as per~~ Schedules A-1 to A-~~8~~3 [*Calculation of Air Contaminant Emission Fees*] ~~and Schedule B [*Calculation of Odorous Air Contaminant Fees*]~~ for the applicable year, but subject to sections 11 through 14.

11. ~~-~~If the authorized discharge for an emission source includes a substance that meets the definition of more than one air contaminant listed in Schedules A-1 to A-3 (a "listed air contaminant"), the District will charge only one air contaminant emission fee for the substance, calculated at the highest emission fee rate of all that apply to the substance.

12. Despite section 11 , if a permit, approval, or emission regulation for an emission source authorizes a quantity, or requires the measurement of, a whole emission discharge of odorous air contaminants in addition to having an authorized discharge of other listed air contaminant(s), the District must charge both the air contaminant emission fee that applies to each authorized listed air contaminant and the air contaminant emission fee for the whole emission discharge of odorous air contaminants, except if the air contaminant is, or is part of, total reduced sulphur (TRS), volatile aldehydes, volatile amines, volatile fatty acids, or volatile ketones, in which case the District must charge only the emission fees as set out in sections 13 and 14 .

13. If a permit, approval, or emission regulation, for an emission source,

(a) authorizes a quantity of whole emission discharge of odorous air contaminants (whether or not the permit, approval, or emission regulation authorizes a quantity of total reduced sulphur (TRS), volatile aldehydes, volatile amines, volatile fatty acids, and volatile ketones for the same emission source), or

(b) requires the measurement of a whole emission discharge of odorous air contaminants (but does not specify a quantity of same), and does not, for the same emission source, specify a quantity of total reduced sulphur (TRS), volatile aldehydes, volatile amines, volatile fatty acids, or volatile ketones,

then for that emission source, the District must charge the air contaminant emission fee for the whole emission discharge of odorous air contaminants and the air contaminant emission fee for any authorized discharge of a listed air contaminant other than total reduced sulphur (TRS), volatile aldehydes, volatile amines, volatile fatty acids, and volatile ketones.

14. If a permit, approval, or emission regulation, for an emission source,

(a) requires the measurement of a whole emission discharge of odorous air contaminants (but does not specify a quantity of whole emission discharge of odorous air contaminants), and

(b) for the same emission source, authorizes a quantity of total reduced sulphur (TRS), volatile aldehydes, volatile amines, volatile fatty acids, or volatile ketones,

then for that emission source, the District must charge the air contaminant emission fees for total reduced sulphur (TRS), volatile aldehydes, volatile amines, volatile fatty acids, and volatile ketones, and the air contaminant emission fees for any authorized discharge of other listed air contaminants from that emission source other than a whole emission discharge of odorous air contaminants.

~~9.~~

~~10.~~**15.** **"Total emission fees**" are calculated as the sum of all air contaminant emission fees applicable for:

(a) annual emissions authorized by a permit or emission regulation; or

(b) the duration of the approval.

Permit and Approval Application Fees

~~11.~~**16.** The application fee payable to the District for an application:

(a) for a new permit or new approval is $1,000 plus twice the total emission fees payable for the emissions specified in the application, to a maximum of $110,000; and

(b) for a permit or approval authorizing the discharge of air contaminants from a facility or operation that has an expiring permit or expiring approval is $1,000 plus the total emission fees payable for the emissions specified in the application, to a maximum of $50,000.

~~12.~~**17.** Despite section ~~11~~16, the application fee payable to the District for an application:

(a) for an open ~~air~~ burning approval associated with a farm operation and conducted on a farm as part of a farm business is $100; and

(b) for all other open ~~air~~ burning approvals is $1,000.

Permit and Approval Amendment Application Fees

~~13.~~**18.** The application fee payable to the District for an application:

(a) for an administrative amendment is $240;

(b) for a minor amendment is $500 plus twice the increase, if any, in the total emission fees payable for the emissions specified in the application; and

(c) for a significant amendment is $1,000 plus twice the increase in the total emission fees payable for the emissions specified in the application, to a maximum of $110,000.

Application Fee Payment

~~14.~~**19.** An application fee must be paid at the time the application is submitted and is not refundable by reason only that the permit, approval, or amendment application is refused.

Annual Fees

~~15.~~**20.** A holder of a permit must pay annually the total emission fees plus an administrative fee of $200, within ~~30~~35 days of ~~receipt of an~~the date the District issued the invoice for the annual fees.

Approval Duration Fees

~~16.~~**21.** A holder of an approval, other than an open ~~air~~ burning approval, must pay the total emission fees for the period authorized by the approval plus an administrative fee of $200 within ~~30~~35 days of ~~receipt of an~~ the date the District issued the invoice for the approval duration fees.

Cancellations and Amendments

~~17.~~**22.** If a permit or approval is cancelled at the request of the holder of the permit or approval, the holder is required to pay to the District any prorated amount of fees as determined by the District. The District will issue an invoice for any prorated amount of fees due or will refund the amount of any overpayment of the applicable fees. Refunds for less than $100 will not be issued.

~~18.~~**23.** If a permit or approval is amended, the District will:

(a) issue an invoice for any prorated amount of fees due;

(b) credit the amount of any overpayment against any fees payable in the subsequent year; or

(c) if no fees are payable in the subsequent year, ~~will~~ refund any overpayment to the holder of the permit or approval. Refunds for less than $100 will not be issued.

~~19.~~**24.** If a permit or approval is amended, the permit or approval holder will pay any amount owing to the District within ~~30~~35 days of ~~receipt of an~~the date the District issued the invoice ~~issued~~ under section ~~18~~23(a).

Interest Charges

25. Where a person fails or refuses to pay an invoice within 40 days of the date the invoice was issued, the person must pay interest at the rate of 1.25% per month (15% per year) compounded monthly and calculated daily on all amounts overdue, including all overdue interest, from the date the charge was due to the date of payment.

~~**Repeal of Bylaw**~~

~~**20.** "*Greater Vancouver Regional District Air Quality Management Fees Regulation Bylaw No. 1083, 2008*" as amended, is hereby repealed.~~

Fee Reduction

26. Where air contaminant emission fees are calculated for whole emission discharge of odorous air contaminants for an emission source that either (i) has an odour unit emission limit in a permit or approval, or (ii) has a permit or approval requirement to measure odour units, the permittee or approval holder may apply for a reduction in air contaminant emission fees, as follows:

(a) Air contaminant emission fees for whole emission discharge of odorous air contaminants may be reduced by 75% if the permittee or approval holder demonstrates to the satisfaction of the district director through approved dispersion modelling that

the whole emission discharge of odorous air contaminants will not exceed one odour unit at the nearest odorous air contaminant sensitive receptor location 99.5% of the time based on a ten-minute average of authorized maximum (permitted) emissions, or 99.8% of the time based on measured emissions; and

(b) If conditions of section 26(a) cannot be met, air contaminant emission fees for whole emission discharge of odorous air contaminants may be reduced by 50% if the permittee or approval holder demonstrates to the satisfaction of the district director through approved dispersion modelling that the whole emission discharge of odorous air contaminants will not exceed three odour units at the nearest odorous air contaminant sensitive receptor location 99.5% of the time based on a ten-minute average of authorized maximum (permitted) emissions, or 99.8% of the time for measured emissions.

Review of Emission Fee Rates

27. The District will review and update emission fee rates for 2029 and later, as well as application fees, where appropriate, with consideration of research, financial analysis, input from interested parties, and other relevant factors, by the end of December 31, 2028 and then at a minimum frequency of once every four years. For clarity, the initial review will include a review of Schedules A-2 and A-3.

Severability

~~21.~~**28.** If any portion of this Regulation is deemed *ultra vires*, illegal, invalid, or unenforceable in any way in whole or in part by any court of competent jurisdiction, such decision will not be deemed to invalidate or void the remainder of the ~~Bylaw~~Regulation. The parts so held to be *ultra vires*, illegal, invalid, or unenforceable must be deemed not to have been part of this Regulation from its adoption. The remainder of the Regulation will have the same force and effect as if the parts that have been deemed *ultra vires*, illegal, invalid, or unenforceable had not been included in this Regulation when it was adopted.

Schedule A-1: Calculation of Air Contaminant Emission Fees until December 31, 2021

1. Air contaminant emission fees (Z) until December 31, 2021 for air contaminants listed in Table 1 are calculated as follows:

$$Z = A \times B$$

where,

A is the authorized discharge in tonnes of an air contaminant listed in column 1 of Table 1, and
B is the corresponding emission fee rate for that air contaminant listed in column 2 of Table 1.

Table 1 – Air Contaminant Emission Fee Rates for Authorized Discharges in 2021

Column 1 (A) **Air Contaminant**	Column 2 (B) **Emission fee rate ($/tonne)**
Particulate Matter (filterable and condensable from solely combustion sources)	$300
Particulate Matter (filterable and condensable from solely non-combustion sources)	$30
Fine Particulate Matter (filterable and condensable from combined combustion and non-combustion sources, not fuelled solely by natural gas and/or propane)	$300
Particulate Matter (all other filterable from combined combustion and non-combustion sources, not fuelled solely by natural gas and/or propane)	$30
Nitrogen Oxides (NOx)	$50
Photoreactive volatile organic compounds	$100
Non-photoreactive volatile organic compounds	$30
Sulphur Oxides (SOx)	$100
Total Reduced Sulphur (TRS)	$150
Hazardous Air Pollutants	$1,000
Other (not otherwise specified)	$30

Schedule A-2: Calculation of Air Contaminant Emission Fees from January 1, 2022 to December 31, 2022

1. Air contaminant emission fees (Z) from January 1, 2022 to December 31, 2022 for air contaminants listed in Table 2 are calculated as follows:

$$Z = A \times B$$

where,

A is the authorized discharge in tonnes of an air contaminant listed in column 1 of Table 2, and
B is the corresponding emission fee rate for that air contaminant listed in column 2 of Table 2.

Table 2 – Air Contaminant Emission Fee Rates for Authorized Discharges in 2022

Column 1 **Air Contaminant (A)**	Column 2 **Emission fee rate ($/tonne) (B)**
Ammonia	$39
Coarse Particulate Matter	$31
Coarse Particulate Matter containing soy dust	$51
Diesel Particulate Matter	$964
Fine Particulate Matter	$514
Hazardous Air Pollutants	$1,143
Metals	$183
Methane	$180
Nitrogen Oxides (NOx)	$64
Non-photoreactive volatile organic compounds	$31
Ozone	$63
Photoreactive volatile organic compounds	$123
Sulphur Oxides (SOx)	$100
Total Reduced Sulphur (TRS)	$367
Other (not otherwise specified)	$31
Other greenhouse gases	Fee per tonne ($) = provincial carbon tax value of carbon dioxide ($ / tonne) multiplied by the global warming potential of the other greenhouse gas, divided by the global warming potential of carbon dioxide

Schedule A-3: Calculation of Air Contaminant Emission Fees from January 1, 2023 to December 31, 2023

1. Air contaminant emission fees (Z) from January 1, 2023 to December 31, 2023 for air contaminants listed in Table 3 are calculated as follows:

$$Z = A \times B$$

where,

A is the authorized discharge in tonnes of an air contaminant listed in column 1 of Table 3, and
B is the corresponding emission fee rate for that air contaminant listed in column 2 of Table 3.

Table 3 – Air Contaminant Emission Fee Rates for Authorized Discharges in 2023

Column 1 **Air Contaminant (A)**	Column 2 **Emission fee rate ($/ tonne)(B)**
Ammonia	$47
Coarse Particulate Matter	$33
Coarse Particulate Matter containing soy dust	$73
Diesel Particulate Matter	$1,629
Fine Particulate Matter	$729
Hazardous Air Pollutants	$1,286
Metals	$336
Methane	$341
Nitrogen Oxides (NOx)	$79
Non-photoreactive volatile organic compounds	$33
Ozone	$96
Photoreactive volatile organic compounds	$146
Sulphur Oxides (SOx)	$100
Total Reduced Sulphur (TRS)	$583
Other (not otherwise specified)	$33
Other greenhouse gases	Fee per tonne ($) = provincial carbon tax value of carbon dioxide ($ / tonne) multiplied by the global warming potential of the other greenhouse gas, divided by the global warming potential of carbon dioxide

Schedule A-4: Calculation of Air Contaminant Emission Fees from January 1, 2024 to December 31, 2024

1. Air contaminant emission fees (Z) from January 1, 2024 to December 31, 2024 for air contaminants listed in Table 4 are calculated as follows:

$$Z = A \times B$$

where,

A is the authorized discharge in tonnes of an air contaminant listed in column 1 of Table 4, and
B is the corresponding emission fee rate for that air contaminant listed in column 2 of Table 4.

Table 4 – Air Contaminant Emission Fee Rates for Authorized Discharges in 2024

Column 1 **Air Contaminant (A)**	Column 2 **Emission fee rate ($/tonne) (B)**
Ammonia	$56
Coarse Particulate Matter	$34
Coarse Particulate Matter containing soy dust	$94
Diesel Particulate Matter	$2,293
Fine Particulate Matter	$943
Hazardous Air Pollutants	$1,429
Metals	$489
Methane	$497
Nitrogen Oxides (NOx)	$93
Non-photoreactive volatile organic compounds	$34
Ozone	$129
Photoreactive volatile organic compounds	$169
Sulphur Oxides (SOx)	$100
Total Reduced Sulphur (TRS)	$800
Other (not otherwise specified)	$34
Other greenhouse gases	Fee per tonne ($) = provincial carbon tax value of carbon dioxide ($ / tonne) multiplied by the global warming potential of the other greenhouse gas, divided by the global warming potential of carbon dioxide

Schedule A-5: Calculation of Air Contaminant Emission Fees from January 1, 2025 to December 31, 2025

1. **Air contaminant emission fees** (Z) from January 1, 2025 to December 31, 2025 for air contaminants listed in Table 5 are calculated as follows:

$$Z = A \times B$$

where,

A is the authorized discharge in tonnes of an air contaminant listed in column 1 of Table 5, and
B is the corresponding emission fee for that air contaminant listed in column 2 of Table 5.

Table 5 – Air Contaminant Emission Fee Rates for Authorized Discharges in 2025

Column 1 **Air Contaminant (A)**	Column 2 **Emission fee rate ($/tonne) (B)**
Ammonia	$64
Coarse Particulate Matter	$36
Coarse Particulate Matter containing soy dust	$116
Diesel Particulate Matter	$2,957
Fine Particulate Matter	$1,157
Hazardous Air Pollutants	$1,571
Metals	$641
Methane	$653
Nitrogen Oxides (NOx)	$107
Non-photoreactive volatile organic compounds	$36
Ozone	$161
Photoreactive volatile organic compounds	$191
Sulphur Oxides (SOx)	$100
Other (not otherwise specified)	$36
Other greenhouse gases	Fee per tonne ($) = provincial carbon tax value of carbon dioxide ($ / tonne) multiplied by the global warming potential of the other greenhouse gas, divided by the global warming potential of carbon dioxide

Schedule A-1

Schedule A-~~6~~1: Calculation of Air Contaminant Emission Fees from ~~January 1~~April 24, 2026 to December 31, ~~2026~~2028

1. ~~Air~~ From April 24, 2026 to December 31, 2028, **air contaminant emission fees** ~~(Z) from January 1, 2026 to December 31, 2026~~ for the discharge of air contaminants listed in Table ~~6~~ A-1 are calculated as follows:

$$Z = A \times B$$

where,

Z is the air contaminant emission fee,

A is the authorized discharge in tonnes of an air contaminant listed in column 1 of Table ~~6~~A-1 or the authorized discharge in billion cubic metre odour units of whole emission discharge of odorous air contaminants listed in column 1 of Table A-1, and

B is the corresponding emission fee rate for that air contaminant or whole emission discharge of odorous air contaminants listed in column 2 of Table ~~6~~A-1.

Table ~~6~~A-1 – ~~Air Contaminant~~ Emission Fee Rates for ~~Authorized Discharges in 2026~~Air Contaminants for April 24, 2026 to December 31, 2028

Column 1 **Air Contaminant (A)**	Column 2 **Emission fee rate ~~($/tonne)~~ (B)**
Ammonia	$73 ($/tonne)
Coarse Particulate Matter	$37 ($/tonne)
Coarse Particulate Matter containing soy dust	$137 ($/tonne)
Diesel Particulate Matter	$3,621 ($/tonne)
Fine Particulate Matter	$1,371 ($/tonne)
Hazardous Air Pollutants	$1,714 ($/tonne)
Metals	$794 ($/tonne)
Methane	$809 ($/tonne)
Nitrogen Oxides (NOx)	$121 ($/tonne)
Non-photoreactive volatile organic compounds	$37 ($/tonne)
Ozone	$194 ($/tonne)
Photoreactive volatile organic compounds	$214 ($/tonne)
Sulphur Oxides (SOx)	$100 ($/tonne)
Total Reduced Sulphur (TRS)	$800 ($/tonne)
Volatile Aldehydes	$1,397 ($/tonne)
Volatile Amines	$2,000 ($/tonne)
Volatile Fatty Acids	$1,603 ($/tonne)
Volatile Ketones	$1,783 ($/tonne)

Whole Emission Discharge of Odorous Air Contaminants	$5 per billion cubic metre odour units
Other (not otherwise specified)	$37 ($/tonne)
Other greenhouse gases	Fee per tonne ($) = provincial carbon tax value of carbon dioxide ($ / tonne) multiplied by the global warming potential of the other greenhouse gas, divided by the global warming potential of carbon dioxide

Schedule A-7: Calculation of Air Contaminant Emission Fees from January 1, 2027 to December 31, 2027

1. Air contaminant emission fees (Z) from January 1, 2027 to December 31, 2027 for air contaminants listed in Table 7 are calculated as follows:

$$Z = A \times B$$

where,

A is the authorized discharge in tonnes of an air contaminant listed in column 1 of Table 7, and
B is the corresponding emission fee rate for that air contaminant listed in column 2 of Table 7.

Table 7 – Air Contaminant Emission Fee Rates for Authorized Discharges in 2027

Column 1 **Air Contaminant (A)**	Column 2 **Emission fee ($/tonne) (B)**
Ammonia	$81
Coarse Particulate Matter	$39
Coarse Particulate Matter containing soy dust	$159
Diesel Particulate Matter	$4,286
Fine Particulate Matter	$1,586
Hazardous Air Pollutants	$1,857
Metals	$947
Methane	$964
Nitrogen Oxides (NOx)	$136
Non-photoreactive volatile organic compounds	$39
Ozone	$227
Photoreactive volatile organic compounds	$237
Sulphur Oxides (SOx)	$100
Other (not otherwise specified)	$39
Other greenhouse gases	Fee per tonne ($) = provincial carbon tax value of carbon dioxide ($ / tonne) multiplied by the global warming potential of the other greenhouse gas, divided by the global warming potential of carbon dioxide

Schedule A-8: Calculation of Air Contaminant Emission Fees for January 1, 2028 and later

1. Air contaminant emission fees (Z) for January 1, 2028 and later for air contaminants listed in Table 8 are calculated as follows:

$$Z = A \times B$$

where,

A is the authorized discharge in tonnes of an air contaminant listed in column 1 of Table 8, and
B is the corresponding emission fee rate for that air contaminant listed in column 2 of Table 8.

Table 8 – Air Contaminant Emission Fee Rates for Authorized Discharges in 2028 and later

Column 1 **Air Contaminant (A)**	Column 2 **Emission fee rate ($/tonne) (B)**
Ammonia	$90
Coarse Particulate Matter	$40
Coarse Particulate Matter containing soy dust	$180
Diesel Particulate Matter	$4,950
Fine Particulate Matter	$1,800
Hazardous Air Pollutants	$2,000
Metals	$1,100
Methane	$1,120
Nitrogen Oxides (NOx)	$150
Non-photoreactive volatile organic compounds	$40
Ozone	$260
Photoreactive volatile organic compounds	$260
Sulphur Oxides (SOx)	$100
Other (not otherwise specified)	$40
Other greenhouse gases	Fee per tonne ($) = provincial carbon tax value of carbon dioxide ($ / tonne) multiplied by the global warming potential of the other greenhouse gas, divided by the global warming potential of carbon dioxide

Schedule A-2

Schedule A-2: Calculation of Air Contaminant Emission Fees from January 1, 2029 to December 31, 2029

1. From January 1, 2029 to December 31, 2029, **air contaminant emission fees** for the discharge of air contaminants listed in Table A-2 are calculated as follows:

$$Z = A \times B$$

where,

Z is the air contaminant emission fee,

A is the authorized discharge in tonnes of an air contaminant listed in column 1 of Table A-2 or the authorized discharge in billion cubic metre odour units of whole emission discharge of odorous air contaminants listed in column 1 of Table A-2, and

B is the corresponding emission fee rate for that air contaminant or whole emission discharge of odorous air contaminants listed in column 2 of Table A-2.

Table A-2 – Emission Fee Rates for Air Contaminants in 2029

Column 1 **Air Contaminant (A)**	Column 2 **Emission fee rate (B)**
Ammonia	$81 ($/tonne)
Coarse Particulate Matter	$39 ($/tonne)
Coarse Particulate Matter containing soy dust	$159 ($/tonne)
Diesel Particulate Matter	$4,286 ($/tonne)
Fine Particulate Matter	$1,586 ($/tonne)
Hazardous Air Pollutants	$1,857 ($/tonne)
Metals	$947 ($/tonne)
Methane	$964 ($/tonne)
Nitrogen Oxides (NOx)	$136 ($/tonne)
Non-photoreactive volatile organic compounds	$39 ($/tonne)
Ozone	$227 ($/tonne)
Photoreactive volatile organic compounds	$237 ($/tonne)
Sulphur Oxides (SOx)	$100 ($/tonne)
Total Reduced Sulphur (TRS)	$960 ($/tonne)
Volatile Aldehydes	$1,676 ($/tonne)
Volatile Amines	$2,400 ($/tonne)
Volatile Fatty Acids	$1,924 ($/tonne)
Volatile Ketones	$2,140 ($/tonne)
Whole Emission Discharge of Odorous Air Contaminants	$6 per billion cubic metre odour units
Other (not otherwise specified)	$39 ($/tonne)

Schedule A-2

Other greenhouse gases	Fee per tonne ($) = provincial carbon tax value of carbon dioxide ($ / tonne) multiplied by the global warming potential of the other greenhouse gas, divided by the global warming potential of carbon dioxide

Schedule A-3

Schedule A-3: Calculation of Air Contaminant Emission Fees for January 1, 2030 and later

1. From January 1, 2030 and onwards, **air contaminant emission fees** for the discharge of air contaminants listed in Table A-3 are calculated as follows:

$$Z = A \times B$$

where,

Z is the air contaminant emission fee,

A is the authorized discharge in tonnes of an air contaminant listed in column 1 of Table A-3 or the authorized discharge in billion cubic metre odour units of whole emission discharge of odorous air contaminants listed in column 1 of Table A-3, and

B is the corresponding emission fee rate for that air contaminant or whole emission discharge of odorous air contaminants listed in column 2 of Table A-3.

Table A-3 – Emission Fee Rates for Air Contaminants in 2030 and later

Column 1 **Air Contaminant (A)**	Column 2 **Emission fee rate (B)**
Ammonia	$90 ($/tonne)
Coarse Particulate Matter	$40 ($/tonne)
Coarse Particulate Matter containing soy dust	$180 ($/tonne)
Diesel Particulate Matter	$4,950 ($/tonne)
Fine Particulate Matter	$1,800 ($/tonne)
Hazardous Air Pollutants	$2,000 ($/tonne)
Metals	$1,100 ($/tonne)
Methane	$1,120 ($/tonne)
Nitrogen Oxides (NOx)	$150 ($/tonne)
Non-photoreactive volatile organic compounds	$40 ($/tonne)
Ozone	$260 ($/tonne)
Photoreactive volatile organic compounds	$260 ($/tonne)
Sulphur Oxides (SOx)	$100 ($/tonne)
Total Reduced Sulphur (TRS)	$1,152 ($/tonne)
Volatile Aldehydes	$2,012 ($/tonne)
Volatile Amines	$2,880 ($/tonne)
Volatile Fatty Acids	$2,308 ($/tonne)
Volatile Ketones	$2,568 ($/tonne)
Whole Emission Discharge of Odorous Air Contaminants	$7 per billion cubic metre odour units
Other (not otherwise specified)	$40 ($/tonne)

Schedule A-3

Other greenhouse gases	Fee per tonne ($) = provincial carbon tax value of carbon dioxide ($ / tonne) multiplied by the global warming potential of the other greenhouse gas, divided by the global warming potential of carbon dioxide

Schedule B: Calculation of Odorous Air Contaminant Emission Fees

1. The emission fee for odorous air contaminants is either a fee for:
(a) The whole emission discharge of odorous air contaminants, as described in section 2 of this Schedule; or
(b) The sum of all emission fees for specified odorous air contaminants, as described in section 3 of this Schedule.

Whole emission discharge
2. The emission fee for a whole emission discharge of odorous air contaminants is the concentration of total odorous air contaminants in the emission, as measured through dynamic olfactometry, expressed in odour units, multiplied by the total volume of authorized air contaminant emissions, expressed in cubic metres, and:
(a) From January 1, 2022 to December 31, 2024:
(i) Where there is an odour unit emission limit in a permit or approval, the fee is calculated at $50 per billion cubic metre odour unit, as follows:
Fee ($) = [$50 x (total annual authorized volume in m^3) x (odour unit emission limit)] / billion cubic metre odour units;
or

(ii) Where there is no odour unit emission limit in a permit or approval, the fee is calculated at $200 per billion cubic metre odour unit, as follows;
Fee ($) = [$200 x (total annual authorized volume in m^3) x (odour units measured)] / billion cubic metre odour units;
and

(b) From January 1, 2025 and later:
(i) Where there is an odour unit emission limit in a permit or approval, the fee is calculated at $60 per billion cubic metre odour unit, as follows:
Fee ($) = [$60 x (total annual authorized volume in m^3) x (odour unit emission limit)] / billion cubic metre odour units;
or

(ii) Where there is no odour unit emission limit in a permit or approval, the fee is calculated at $240 per billion cubic metre odour unit, as follows:
Fee ($) = [$240 x (total annual authorized volume in m^3) x (odour units measured)] / billion cubic metre odour units.

Specified odorous air contaminants
3. The emission fee for specified odorous air contaminants is the sum of the fees for those specified odorous air contaminants, as set out in sections 4 and 5 of this Schedule. The emission fee for a specified odorous air contaminant is based on the odour detection threshold of the specified odorous air contaminant.

4. Where an odorous air contaminant is set out in Column 1 of Table 9:
(a) From January 1, 2022 to December 31, 2024, the fee for that odorous air contaminant (Z) is either:

~~(i) The fee for the permitted level of that odorous air contaminant as set out in a permit or approval, calculated as:~~
~~Z = A x B~~
~~where,~~
~~A is the permitted level in kilograms of that air contaminant listed in column 1 of Table 9, and~~
~~B is the corresponding fee rate per kilogram of that air contaminant listed in column 2 of Table 9;~~

~~or~~

~~(ii) The fee for the measured level of that odorous air contaminant, calculated as:~~
~~Z = C x D~~
~~where,~~
~~C is the measured level in kilograms of that air contaminant listed in column 1 of Table 9, and~~
~~D is the corresponding fee rate per kilogram of that air contaminant listed in column 3 of Table 9; and~~

~~(b) From January 1, 2025 and later, the fee for that odorous air contaminant is either:~~
~~(i) The fee for the permitted level of that odorous air contaminant as set out in a permit or approval, calculated as:~~
~~Z = A x B~~
~~where,~~
~~A is the permitted level in kilograms of that air contaminant listed in column 1 of Table 9, and~~
~~B is the corresponding fee rate per kilogram of that air contaminant listed in column 4 of Table 9;~~
~~or~~

~~(ii) The fee for the measured level of that odorous air contaminant, calculated as:~~
~~Z = C x D~~
~~where,~~
~~C is the measured level in kilograms of that air contaminant listed in column 1 of Table 9, and~~
~~D is the corresponding fee rate per kilogram of that air contaminant listed in column 5 of Table 9.~~

~~5. Subject to section 6 of this Schedule, where an odorous air contaminant is not set out in Column 1 of Table 9:~~
~~(a) From January 1, 2022 to December 31, 2024, the fee for that odorous air contaminant is either:~~
~~(i) The fee for the described limit of that odorous air contaminant as set out in a permit or approval, calculated as:~~
~~Fee ($) = $50 / billion cubic metres x [permit or approval concentration limit in mg/m^3 / odour detection threshold in mg/m^3] x permitted flow rate (billion m^3/year or authorized period);~~

~~or~~

~~(ii) For an odorous air contaminant without a described limit in a permit or approval for which monitoring is required, the fee for that odorous air contaminant is calculated as:~~
~~Fee ($) = $200 / billion cubic metres x [measured concentration in mg/m^3 / odour detection threshold in mg/m^3] x permitted flow rate (billion m^3/authorized period); and~~

~~(b) From January 1, 2025 and later, the fee for that odorous air contaminant is either:~~

(i) The fee for the described limit of that odorous air contaminant as set out in a permit or approval, calculated as:
Fee ($) = $60 / billion cubic metres x [permit or approval concentration limit in mg/m³ / odour detection threshold in mg/m³] x permitted flow rate (billion m³/year or authorized period);
or

(ii) For an odorous air contaminant without a described limit in a permit or approval for which monitoring is required, the fee for that odorous air contaminant is calculated as:
Fee ($) = $240 / billion cubic metres x [measured concentration in mg/m³ / odour detection threshold in mg/m³] x permitted flow rate (billion m³/authorized period); and

in cases of odorous air contaminants where there is a concentration of an odorous air contaminant below the analytical method detection limit, the fee shall be based on 25% of the analytical method detection limit.

6. The fee rate for an odorous air contaminant not set out in Column 1 of Table 9 is not to exceed $1,000 per kilogram.

Fee Reduction
7. If the permittee or approval holder is able to demonstrate to the satisfaction of the district director that substantial dilution of the emission occurs before contact with an odorous air contaminant sensitive receptor location, the permittee or approval holder may apply for a reduction in odorous air contaminant emission fees based on the following:

(a) Fees may be reduced by 75% if it can be demonstrated through approved dispersion modelling that one odour unit can be achieved at the nearest odorous air contaminant sensitive receptor location 99.5% of the time based on a ten-minute average of authorized maximum (permitted) emissions, or 99.8% of the time based on measured emissions; and

(b) Fees may be reduced by 50% if it can be demonstrated through approved dispersion modelling that three odour units can be achieved at the nearest odorous air contaminant sensitive receptor location 99.5% of the time based on a ten-minute average of authorized maximum (permitted) emissions, or 99.8% of the time for measured emissions.

Table 9 – Fee Rates for Specified Odorous Air Contaminants, with Permitted or Measured Levels

Column 1 Odorous Air Contaminant	Column 2 Fee rate ($/kg), for permitted levels, from January 1, 2022 to December 31, 2024	Column 3 Fee rate ($/kg), for measured levels, from January 1, 2022 to December 31, 2024	Column 4 Fee rate ($/kg), for permitted levels, from January 1, 2025 and later	Column 5 Fee rate ($/kg), for measured levels, from January 1, 2025 and later
1-nonene	18	72	22	86
1-octene	11	44	13	52
2,3-pentanedione	2.3	9.5	2.8	11.4
2,6-nonadienal	675	1,000	810	1,000
2-chlorophenol	12	51	15	61
2-heptanone (methyl n-amyl ketone)	1.5	6.2	1.8	7.5
2-methyl butanoic acid	6.3	25.3	7.5	30.3
2-methyl 1-propanol (isobutanol)	1.5	6.0	1.8	7.2
2-methylpropionoic acid (isobutyric acid)	9.2	37.0	11.1	44.4
3-methyl butanoic acid (isovaleric acid)	151	606	181	727
3-methylbutanal (isovaleraldehyde)	142	571	171	685
Acetic acid (ethanoic acid)	3.4	13.6	4.0	16.3
Allyl sulphide	49	195	58	234
Butanal	25	100	30	120
Butanoic acid (butyric acid)	73	294	88	352
Butanoic acid, butyl ester (butyl butanoate/butyrate)	1.7	7.1	2.1	8.5
Butyl mercaptan	1,000	1,000	1,000	1,000
Decanal (decaldehyde, capradehyde)	19	76	23	92
Diacetyl	284	1,000	341	1,000
Diallyl disulphide	49	195	58	234
Diethyl disulphide	5.0	20.0	6.0	24.0
Diethyl sulphide	411	1,000	493	1,000
Dimethyl disulphide	5.8	23.5	7.0	28.2
Dimethyl sulphide	6.5	26.3	7.8	31.5
Dimethyl trisulphide	5.7	22.9	6.8	27.5
Ethyl isobutyrate	479	1,000	575	1,000
Ethyl isovalerate	723	1,000	868	1,000
Ethyl mercaptan (ethanethiol)	1,000	1,000	1,000	1,000
Ethyl n-butyrate	263	1,000	316	1,000
Ethyl n-valerate	85	342	103	410
Ethyl propionate	1.7	6.8	2.1	8.2
Hexanal (hexaldehyde)	45	181	54	218

Column 1 Odorous Air Contaminant	Column 2 Fee rate ($/kg), for permitted levels, from January 1, 2022 to December 31, 2024	Column 3 Fee rate ($/kg), for measured levels, from January 1, 2022 to December 31, 2024	Column 4 Fee rate ($/kg), for permitted levels, from January 1, 2025 and later	Column 5 Fee rate ($/kg), for measured levels, from January 1, 2025 and later
Hexanoic acid (caproic acid)	17	71	21	85
Hydrogen sulphide	87	350	105	421
Isoamyl mercaptan	1,000	1,000	1,000	1,000
Isobutyl acetate	1.3	5.3	1.6	6.3
Isobutyl acrylate	11	42	13	51
Isobutyl amine	113	454	136	545
Isobutyl isovalerate	1.5	6.0	1.8	7.1
Isobutyl mercaptan	1,000	1,000	1,000	1,000
Isobutyl n-butyrate	5.3	21.2	6.4	25.5
Isohexanoic acid	26	105	32	126
Isooctanol	1.0	4.0	1.2	4.9
Isopentanol	8.2	32.7	9.8	39.2
Isopropyl mercaptan	1,000	1,000	1,000	1,000
Isopropyl n-butyrate	2.2	9.0	2.7	10.8
Isopropyl propionate	2.6	10.3	3.1	12.3
Isopropylbenzene	1.2	4.9	1.5	5.8
Isobutylaldehyde	49	194	58	233
Methacrolein	2.1	8.2	2.5	9.9
Methyl acrylate	4.1	16.2	4.9	19.5
Methyl allyl sulphide	99	397	119	476
Methyl isoamyl ketone	5.1	20.4	6.1	24.5
Methyl isobutyrate	6.3	25.2	7.6	30.2
Methyl isovalerate	4.8	19.1	5.7	23.0
Methyl mercaptan (methanethiol)	364	1,000	437	1,000
Methyl n-butyrate	17	67	20	81
Methyl n-valerate	4.8	19.1	5.7	23.0
Methylamine	1.8	7.4	2.2	8.8
n-Amyl mercaptan	1,000	1,000	1,000	1,000
n-Butyl acrylate	17	69	21	83
n-Butyl n-butyrate	1.8	7.1	2.1	8.5
n-Butylaldehyde	25	101	30	122
n-Butylbenzene	1.1	4.3	1.3	5.2
n-Decanol	10	40	12	48

Column 1 Odorous Air Contaminant	Column 2 Fee rate ($/kg), for permitted levels, from January 1, 2022 to December 31, 2024	Column 3 Fee rate ($/kg), for measured levels, from January 1, 2022 to December 31, 2024	Column 4 Fee rate ($/kg), for permitted levels, from January 1, 2025 and later	Column 5 Fee rate ($/kg), for measured levels, from January 1, 2025 and later
n-Decylaldehyde	20	78	23	94
n-Heptanol	2.2	8.7	2.6	10.5
n-Heptylaldehyde	59	238	71	285
n-Hexanol	2.0	8.0	2.4	9.6
n-Hexyl acetate	4.7	18.8	5.7	22.6
n-Hexyl mercaptan	690	1,000	827	1,000
n-Hexylaldehyde	44	174	52	209
n-Nonanol	9.4	37.7	11.3	45.2
n-Nonylaldehyde	25	101	30	121
n-Octylaldehyde	954	1,000	1,000	1,000
Nonanoic acid	3.8	15.3	4.6	18.4
n-propyl isobutyrate	5.3	21.0	6.3	25.2
n-propyl isovalerate	151	606	182	727
n-propyl n-valerate	2.6	10.3	3.1	12.3
Octanal	1,000	1,000	1,000	1,000
p-Diethylbenzene	23	93	28	112
Pentanal (valeraldehyde)	35	142	42	171
Pentanoic acid (valeric acid)	333	1,000	400	1,000
p-Ethyltoluene	1.2	4.9	1.5	5.9
Propanal (propionaldehyde)	20	83	25	100
Propionic acid	2.9	11.6	3.5	13.9
Propyl mercaptan (propanethiol)	1,000	1,000	1,000	1,000
Propylbenzene	2.6	10.5	3.1	12.6
Pyridine	119	476	143	571
Sec-butyl mercaptan	452	1,000	542	1,000
Sec-butyl acetate	4.4	17.5	5.3	21.0
Tert-butyl mercaptan	467	1,000	561	1,000
Tetrahydrothiophene	22	90	27	107
Thiophene	26	105	31	126
Trimethylamine	89	357	107	428
Undecanal	2.7	11.1	3.3	13.3

Schedule B

Schedule B: List of Hazardous Air Pollutants

Chemical Abstracts Service Number (CAS)	Substance Name
79-34-5	1,1,2,2-Tetrachloroethane
79-00-5	1,1,2-Trichloroethane
57-14-7	1,1-Dimethyl hydrazine
120-82-1	1,2,4-Trichlorobenzene
96-12-8	1,2-Dibromo-3-chloropropane
107-06-2	1,2-Dichloroethane
122-66-7	1,2-Diphenylhydrazine
106-88-7	1,2-Epoxybutane (Ethyloxirane)
75-55-8	1,2-Propylenimine (2-Methyl aziridine)
106-99-0	1,3-Butadiene
78-79-5	1,3-Butadiene, 2-methyl- (C_5H_8)
542-75-6	1,3-Dichloropropene
1120-71-4	1,3-Propane sultone (1,2-Oxathiolane, 2,2-dioxide)
106-46-7	1,4-Dichlorobenzene(p)
123-91-1	1,4-Dioxane (1,4-Diethyleneoxide)
106-94-5	1-Bromopropane
1589-47-5	1-Propanol, 2-methoxy- ($C_4H_{10}O_2$)
540-84-1	2,2,4-Trimethylpentane
1746-01-6	2,3,7,8-Tetrachlorodibenzo-p-dioxin
95-95-4	2,4,5-Trichlorophenol
88-06-2	2,4,6-Trichlorophenol
94-75-7	2,4-D, salts and esters
51-28-5	2,4-Dinitrophenol
121-14-2	2,4-Dinitrotoluene
95-80-7	2,4-Toluene diamine (1,3-Benzenediamine, 4-methyl-)
584-84-9	2,4-Toluene diisocyanate (Benzene, 2,4-diisocyanato-1-methyl-)
53-96-3	2-Acetylaminofluorene
96-29-7	2-Butanone, oxime (C_4H_9NO)
111-76-2	2-Butoxyethanol ($C_6H_{14}O_2$)
532-27-4	2-Chloroacetophenone
79-46-9	2-Nitropropane
91-94-1	3,3-Dichlorobenzidene
119-90-4	3,3-Dimethoxybenzidine
119-93-7	3,3'-Dimethyl benzidine ([1,1’-Biphenyl]-4,4’-diamine, 3,3’-dimethyl-)
Ba101-14-4	4,4-Methylene bis(2-chloroaniline); (Benzenamine, 4,4’-methylenebis[2-chloro-)
101-77-9	4,4'-Methylenedianiline
92-67-1	4-Aminobiphenyl

Chemical Abstracts Service Number (CAS)	Substance Name
92-93-3	4-Nitrobiphenyl
100-02-7	4-Nitrophenol
75-07-0	Acetaldehyde
60-35-5	Acetamide
75-05-8	Acetonitrile
98-86-2	Acetophenone
107-02-8	Acrolein
79-06-1	Acrylamide
79-10-7	Acrylic acid
107-13-1	Acrylonitrile
107-05-1	Allyl chloride (3-chloropropene)
62-53-3	Aniline
No applicable CAS number	Antimony Compounds
No applicable CAS number	Arsenic Compounds (inorganic including arsine)
1332-21-4	Asbestos
50-32-8	Benz[a]pyrene (Polycyclic aromatic hydrocarbons)
71-43-2	Benzene (including benzene from gasoline)
100-44-7	Benzene, (chloromethyl)- (C_7H_7Cl)
2536-05-2	Benzene, 1,1′-methylenebis[2-isocyanato- ($C_{15}H_{10}N_2O_2$)
26447-40-5	Benzene, 1,1′-methylenebis[isocyanato- (non-isomeric-specific) ($C_{15}H_{10}N_2O_2$)
93-58-3	Benzene, 1,2-dimethoxy-4-(2-propenyl)- ($C_{11}H_{14}O_2$)
91-08-7	Benzene, 1,3,-diisocyanato-2-methyl- (2,6-TDI) (Toluene diisocyanates ($C_9H_6N_2O_2$))
26471-62-5	Benzene, 1,3,-diisocyanatomethyl- (TDI mixed isomers) (Toluene diisocyanates ($C_9H_6N_2O_2$))
53-19-0	Benzene, 1-chloro-2-[2,2-dichloro-1-(4-chlorophenyl)ethyl]-, which has the molecular formula $C_{14}H_{10}Cl_4$
88-72-2	Benzene, 1-methyl-2-nitro- ($C_7H_7NO_2$)
584-84-9	Benzene, 2,4,-diisocyanato-1-methyl- (2,4-TDI) (Toluene diisocyanates ($C_9H_6N_2O_2$))
205-99-2	Benzo[b]fluoranthene (Polycyclic aromatic hydrocarbons)
205-82-3	Benzo[j]fluoranthene (Polycyclic aromatic hydrocarbons)
207-08-9	Benzo[k]fluoranthene (Polycyclic aromatic hydrocarbons)
98-07-7	Benzotrichloride
100-44-7	Benzyl chloride
No applicable CAS number	Beryllium Compounds
57-57-8	beta-Propiolactone
92-52-4	Biphenyl
117-81-7	Bis(2-ethylhexyl)phthalate (DEHP)
S75-25-2	Bromoform (tribromo-methane)
No applicable CAS number	Cadmium Compounds

Chemical Abstracts Service Number (CAS)	Substance Name
156-62-7	Calcium cyanamide
133-06-2	Captan
63-25-2	Carbaryl
75-15-0	Carbon disulfide
56-23-5	Carbon tetrachloride
463-58-1	Carbonyl sulfide
120-80-9	Catechol (1,2-benzenediol)
133-90-4	Chloramben (3-Amino-2,5-dichlorobenzoic acid)
57-74-9	Chlordane
7782-50-5	Chlorine
79-11-8	Chloroacetic acid
108-90-7	Chlorobenzene
510-15-6	Chlorobenzilate
67-66-3	Chloroform
126-99-8	Chloroprene
No applicable CAS number	Chromium Compounds
No applicable CAS number	Cobalt Compounds
No applicable CAS number	Coke Oven Emissions
1319-77-3	Cresols/Cresylic acid (isomers and mixture)
98-82-8	Cumene
No applicable CAS number	Cyanide Compounds, X'CN where X = H' or any other group where a formal dissociation may occur. For example, KCN or Ca(CN)2
556-67-2	Cyclotetrasiloxane, octamethyl- ($C_8H_{24}O_4Si_4$)
334-88-3	Diazomethane
132-64-9	Dibenzofurans
2629-41-4	Dibenzo-para-dioxin ($C_{12}H_8O_2$)
84-74-2	Dibutylphthalate
111-44-4	Dichloroethyl ether (Bis(2-chloroethyl)ether)
111-42-2	Diethanolamine
64-67-5	Diethyl sulfate (diethyl ester sulfuric acid)
60-11-7	Dimethyl aminoazobenzene
79-44-7	Dimethyl carbamoyl chloride
68-12-2	Dimethyl formamide (Formamide, N,N-dimethyl-)
131-11-3	Dimethyl phthalate
77-78-1	Dimethyl sulfate
106-89-8	Epichlorohydrin (l-Chloro-2,3-epoxypropane); Oxirane, (chloromethyl)
111-77-3	Ethanol, 2-(2-methoxyethoxy)- ($C_5H_{12}O_3$)
110-49-6	Ethanol, 2-methoxy-, acetate ($C_5H_{10}O_3$)
140-88-5	Ethyl acrylate (2-Propenoic acid, ethyl ester)
100-41-4	Ethyl benzene

Chemical Abstracts Service Number (CAS)	Substance Name
51-79-6	Ethyl carbamate (Urethane), (Carbamic acid, ethyl ester)
75-00-3	Ethyl chloride (Chloroethane)
106-93-4	Ethylene dibromide (Dibromoethane)
107-06-2	Ethylene dichloride (1,2-Dichloroethane)
107-21-1	Ethylene glycol (1,2-Ethanediol)
151-56-4	Ethylene imine (Aziridine)
75-21-8	Ethylene oxide
96-45-7	Ethylene thiourea (2-Imidazolidinethione)
75-34-3	Ethylidene dichloride (1,1-Dichloroethane)
No applicable CAS number	Fine mineral fibers, includes mineral fiber emissions from facilities manufacturing or processing glass, rock, or slag fibers (or other mineral derived fibers) of average diameter 1 micrometer or less
50-00-0	Formaldehyde
No applicable CAS number	Glycol ethers, Includes mono- and di- ethers of ethylene glycol, diethylene glycol, and triethylene glycol R-(OCH2CH2)n -OR' where n = 1, 2, or 3 R = alkyl or aryl groups R' = R, H, or groups which, when removed, yield glycol ethers with the structure: R-(OCH2CH)n-OH. Polymers are excluded from the glycol category.
77-47-4	Hexachlorocyclopentadiene
67-72-1	Hexachloroethane
822-06-0	Hexamethylene-1,6-diisocyanate
680-31-9	Hexamethylphosphoramide
110-54-3	Hexane
103-23-1	Hexanedioic acid, bis(2-ethylhexyl) ester ($C_{22}H_{42}O_4$)
302-01-2	Hydrazine
7647-01-0	Hydrochloric acid
7664-39-3	Hydrogen fluoride (Hydrofluoric acid)
7783-06-4	Hydrogen sulfide
123-31-9	Hydroquinone (1,4-Benzenediol)
193-39-5	indeno[1,2,3-cd]pyrene (Polycyclic aromatic hydrocarbons)
9016-87-9	Isocyanic acid, polymethylenepolyphenylene ester ($(C_{15}H_{10}N_2O_2 \bullet [C_8H_5NO]_n)$)
78-59-1	Isophorone
No applicable CAS number	Lead Compounds
58-89-9	Lindane (all isomers); (Cyclohexane, 1,2,3,4,5,6-hexachloro-, (1α,2α,3β,4α,5α,6β)-)
108-31-6	Maleic anhydride (2,5-Furandione)
No applicable CAS number	Manganese Compounds
108-39-4	m-Cresol
No applicable CAS number	Mercury Compounds

Chemical Abstracts Service Number (CAS)	Substance Name
67-56-1	Methanol
90-94-8	Methanone, bis[4-(dimethylamino)phenyl]- ($C_{17}H_{20}N_2O$)
72-43-5	Methoxychlor (Benzene, 1,1'-(2,2,2-trichloroethylidene)bis[4-methoxy-)
74-83-9	Methyl bromide (Bromomethane)
74-87-3	Methyl chloride (Chloromethane)
71-55-6	Methyl chloroform (1,1,1-Trichloroethane)
78-93-3	Methyl ethyl ketone (2-Butanone)
60-34-4	Methyl hydrazine
74-88-4	Methyl iodide (Iodomethane)
108-10-1	Methyl isobutyl ketone (Hexone)- 2-Pentanone, 4-methyl-
624-83-9	Methyl isocyanate
80-62-6	Methyl methacrylate (2-Propenoic acid, 2-methyl-, methyl ester)
1634-04-4	Methyl tert butyl ether (Propane, 2-methoxy-2-methyl-)
75-09-2	Methylene chloride (Dichloromethane)
101-68-8	Methylene diphenyl diisocyanate (MDI); (Benzene, 1,1'-methylenebis[4-isocyanato-)
569-64-2	Methylium, [4-(dimethylamino)phenyl]bis[4-(ethylamino)-3-methylphenyl]-, acetate
108-38-3	m-Xylenes
121-69-7	N,N-Dimethylaniline (dimethyl-benzenamine)
91-20-3	Naphthalene
No applicable CAS number	Nickel Compounds
98-95-3	Nitrobenzene
59-89-2	N-Nitrosomorpholine
684-93-5	N-Nitroso-N-methylurea
No applicable CAS number	Nonylphenol and its ethoxylates
90-04-0	o-Anisidine
95-48-7	o-Cresol
95-53-4	o-Toluidine
95-47-6	o-Xylenes
56-38-2	Parathion
106-44-5	p-Cresol
82-68-8	Pentachloronitrobenzene (Quintobenzene)
87-86-5	Pentachlorophenol
108-95-2	Phenol
17540-75-9	Phenol, 2,6-bis(1,1-dimethylethyl)-4-(1-methylpropyl)-, which has the molecular formula $C_{18}H_{30}O$
75-44-5	Phosgene
7803-51-2	Phosphine
7723-14-0	Phosphorus
85-44-9	Phthalic anhydride

Chemical Abstracts Service Number (CAS)	Substance Name
1336-36-3	Polychlorinated biphenyls (Aroclors)- (1,1'-Biphenyl, chloro derivs.)
No applicable CAS number	Polycyclic Organic Matter, includes organic compounds with more than one benzene ring, and which have a boiling point greater than or equal to 100 ºC.
106-50-3	p-Phenylenediamine
123-38-6	Propionaldehyde
114-26-1	Propoxur (Baygon)
78-87-5	Propylene dichloride (1,2-Dichloropropane)
75-56-9	Propylene oxide
106-42-3	p-Xylenes
91-22-5	Quinoline
106-51-4	Quinone
No applicable CAS number	Refractory ceramic fibre
No applicable CAS number	Selenium Compounds
100-42-5	Styrene (Benzene, ethenyl-)
96-09-3	Styrene oxide (Oxirane, phenyl-)
1461-22-9	Tetrabutyltins ($(C_4H_9)_4Sn$)
127-18-4	Tetrachloroethylene
127-18-4	Tetrachloroethylene (Perchloroethylene)
7550-45-0	Titanium tetrachloride
108-88-3	Toluene (methyl benzene)
81741-28-8	Tributyltetradecylphosphonium chloride ($C_{26}H_{56}P•Cl$)
79-01-6	Trichloroethylene
121-44-8	Triethylamine
1582-09-8	Trifluralin (Benzenamine, 2,6-dinitro-N,N-dipropyl-4-(trifluoromethyl)-)
108-05-4	Vinyl acetate
593-60-2	Vinyl bromide
75-01-4	Vinyl chloride
75-35-4	Vinylidene chloride (1,1-Dichloroethylene)
1330-20-7	Xylenes (isomers and mixture)

NOTE: For all substances listed above which contain the word "compounds" after the name of a chemical (i.e., antimony, arsenic, etc.), and for glycol ethers, the following applies: Unless otherwise specified, these listings are defined as including any unique chemical substance that contains the named chemical (i.e., antimony, arsenic, etc.) as part of that chemical's infrastructure.

Benchmarking of Regulatory Fees and Cost Recovery Approaches

Jurisdiction	Cost-recovery principle	Application fee for new permits	Maximum renewal fee	Annual emission or inspection fee	Odorous pollutants subject to emission fees
Metro Vancouver	Full cost recovery from dischargers	New permit: $1,000 plus twice the total emission fees for emissions specified in the application, up to $110,000 New permit for a facility that has an expiring permit: $1,000 plus the total emission fees for emissions specified in the application, up to $50,000 In past 10 years, 85% below $10,000	N/A	Annual fee per tonne of air contaminant	Emission fee applies per tonne of air contaminant, including total reduced sulphur (TRS), volatile aldehydes, volatile amines, volatile fatty acids, and volatile ketones
Alberta Environment and Protected Areas (Canada)	Partial cost recovery from dischargers; public taxes cover remainder	Category 1 (Large-Scale or High-Impact Facilities): $30,000[1] Category 2 (Medium-Large Facilities): $15,000 Category 3 Medium-Small Facilities: $5,000	Category 1: $15,000 Category 2 (Medium-Large Facilities): $7,500 Category 3 Medium-Small Facilities: $2,500	None	None – Alberta does not charge emission fees; odours managed through ambient TRS guideline
Québec Ministry of the Environment, the Fight against Climate Change, Wildlife and Parks (Canada)	50% cost recovery from dischargers[2]; public taxes cover remainder	CAD$223,000[3] – maximum fee for Category 4 projects (new oil refinery, rendering plant, cement plant, metallurgical plant, etc.) involving environmental assessment and public notification CAD$186,000[4] – maximum fee for Category 3 major plant capacity increases involving environmental assessment and public notification	CAD$10,452 for renewals of industrial authorizations	CAD$3,710 fixed annual fee plus CAD$9.08 per tonne of air contaminant emitted	Emission fee applies per tonne of any air contaminant, including TRS, VOCs, and hydrogen sulphide

[1] Alberta Environment and Protected Areas
[2] Rapport annuel de gestion 2023-2024, P. 55.
[3] Article 22, al. 1, 6° de la LQE – Rejets de contaminants dans l'atmosphère; Procédure d'évaluation environnementale - Québec méridional
[4] Q-2R28.02_FR_001_001.pdf

Jurisdiction	Cost-recovery principle	Application fee for new permits	Maximum renewal fee	Annual emission or inspection fee	Odorous pollutants subject to emission fees
Ontario Ministry of the Environment, Conservation and Parks (Canada)	Partial cost recovery from dischargers; public taxes cover remainder	Fee varies by equipment; no cap **Administrative Processing Fee** • $100 / $200 (without / with technical review) **Subject Matter Review** • $400 per piece of equipment • Up to $42,000 for hazardous waste incineration sites **Additional Reviews (if required)** • Emission Summary: up to $3,000 • Noise Assessment: $500–$2,250 **Environmental Review Tribunal Hearing (if required)** $18,000	$400: if there is no increase in authorized discharge. Renewals require a new application if conditions change; same fees apply	None	None – odour managed via odour screening for Environmental Activity and Sector Registry (EASR) registrants
Ministry of Environment and Parks, British Columbia	No cost-recovery principle stated	Tier 3[5]: $10,000* Tier 2[6]: $2,500* Tier 1[7]: $1,250* Frequent Amendments Surcharge: Increases the application fee by 2x*	Not applicable	Base fee: Tier 3[1]: $5,000* Tier 2[2]: $2,500* Tier 3[3]: $1,250* plus emission fees ranging from $0.54 to $815.06 per tonne discharged	Emission fees for ammonia $20.30 per tonne, TRS $679.21 per tonne, VOCs (volatile organic compounds) $20.30 per tonne
Northwest Clean Air Agency	Full cost recovery from dischargers	New source review fee (per source): No cap; for large equipment approx. $25,000+[8]	Covered under annual operating fee (Air Operating Permits renews every five years)	Annual fee for Air Operating Permits: No cap; for 2024 highest fee for a facility was US$858,100[9]	None

* Environmental Management Act (EMA) Fee Review: Summary of proposed changes (confidential)

[5] Projects under the Environmental Assessment Act's (EAA) Reviewable Project Regulation

[6] Regulated entities under the Waste Discharge Regulation Schedule 1

[7] Regulated entities under the Waste Discharge Regulation Schedule 2

[8] Northwest Clean Air Agency (NWCAA) New source review fee schedule

[9] Regulation of the Northwest Clean Air Agency

Jurisdiction	Cost-recovery principle	Application fee for new permits	Maximum renewal fee	Annual emission or inspection fee	Odorous pollutants subject to emission fees
Nova Scotia, Department of Environment and Climate Change	No cost-recovery principle stated	Category I[10]: $8,625.15 Category II: $3,317.35 Category III: $1,326.95 Category IV: $484 + Environmental assessment fee if required Category I seeking registration: $17,250.40 Category II seeking registration: $11,146.40 Category III seeking registration = $6,369.35 Approval transfer = $662.85 Focus report = $6,634.75 Environmental assessment report = $17,250.4 Additional information request = 50% of registration fee	Same as application for a new permit	Class 1: ≥30 (Threshold, tonnes of pollutants/year) = $7.35/tonne Class 2: <30 (Threshold, tonnes of pollutants/year) = no fee	None
New Brunswick, Environment and natural resources	Partial cost recovery; public funds cover remainder	Class 1A (large industrial facilities e.g., pulp mills, oil refineries, power plants): $66,000; Class 1B: $30,800; Class 2: $16,500; Class 3: $5,500; Class 4 (small operations e.g., rock quarries, concrete plants): $1,100 Above fees are payable every year[11]	Same as application (annual)	None	None
New York State Department of Environmental Conservation (USA)	Full cost recovery from dischargers	Costs recovered through annual fees to a maximum of US$632,500[12] [13] per year	Title V permits renewed every five years without a separate renewal fee; Facilities continue to pay annual fees	Annual base fee US$2,500 + per-ton emission fee US$60/ton to $90/ton to a maximum of US$632,500	Emission fee applies per ton of odorous compounds such as volatile organic compounds (VOCs)

[10] Fees Regulations made under clause 8A(1)(a) of the Environment Act, 11 (2)
[11] New Brunswick Air quality and environmental programs
[12] Express Terms 6 NYCRR Subpart 482-2, "Operating Permit Program Fee"
[13] Air Facility Permits, Registrations And Fees

Jurisdiction	Cost-recovery principle	Application fee for new permits	Maximum renewal fee	Annual emission or inspection fee	Odorous pollutants subject to emission fees
South Coast Air Quality Management District (California, USA)	Full cost recovery from dischargers	**Non-Title V Not to Exceed:** US$105,925.6 **Title V facilities maximum fee** US$296,811.26 plus public hearing fees (US$6,489.04 plus US$2,017.53 per hour) and equipment fees [14]	Title V Annual Operating Permit Renewal Fee: US$6,095.70 plus RECLAIM fee $272.16 per Process Unit Device + Title V fee US$1,027.61 per facility	Flat annual emissions fee of US$170.94 plus US$0.04 to US$1,971.08 per ton per year charged when release is greater than or equal to the annual thresholds Plus Refinery-related Community Air Monitoring System Annual Operating and Maintenance Fees	None – odour complaints handled via nuisance provisions
Bay Area Air Quality Management District (California, USA)	Full cost recovery from dischargers; discounts available for small/green businesses	Up to US$200,137[15] per combustion source for schedule B initial fee. Additional fees for risk assessments US$200,137 per combustion source and toxic surcharges; maximum schedule values differ across equipment categories.	**Permit-to-operate fee** US$100,069 per combustion source plus **Processing Fee for Renewal** • US$1,296 maximum for facilities with more than 20 permitted sources. Plus (if applicable)	Major stationary source fee: US$164.07 per ton of organic compounds, SOx, NOx, PM10 Refining Emissions Tracking Fees (if applicable): US$118,388 (initial submission)	None – odour regulation under Regulation 7; no fee

[14] Rule 301. Permitting And Associated Fees, P. 301 – 69

[15] Regulation 3 Fees, P. 3-23

Jurisdiction	Cost-recovery principle	Application fee for new permits	Maximum renewal fee	Annual emission or inspection fee	Odorous pollutants subject to emission fees
			Surcharges & Caps • AB 617 Community Health Impact Fee: capped at US$129,815/yr • Criteria Pollutant & Toxic Emissions Reporting (CTR): capped at US$64,908/yr • Overburdened Community Fee: capped at US$282,207/yr	US$59,195 (subsequent annual submissions) Major stationary source community air monitoring fees (schedule X): US$60.61 per ton of organic compounds, SOx, NOx, PM10	
Texas Commission on Environmental Quality (USA)	Full cost recovery from dischargers	US$75,000[16] maximum for New Source Review permits (0.30% of capital cost, capped); Prevention of Significant Deterioration permits charge 1% of capital cost (no published maximum)	New source review permit renewal fee is based on an incremental formula applied based on tonnage and is capped at US$10,000.	Air emissions or inspection fee based on the greater of pollutant tonnage or inspection rate (rate varies; first 4,000 tons per pollutant counted)	Emission fees apply to all regulated pollutants, including odorous compounds such as volatile organic compounds (VOCs), hydrogen sulphide and ammonia

[16] Fee Rates Associated with Air Permitting

Number of air quality complaints received by Metro Vancouver

In recent years, Metro Vancouver has received more than 2,000 air quality complaints each year, a reduction compared to the historical peaks of over 4,000 complaints in 2016 and 2018 (Figure 1), prior to the adoption of Bylaw 1330. The jurisdictions with the highest numbers of complaints consistently are Vancouver, Burnaby, Delta, Richmond, Surrey, and the Township of Langley (Figure 2). Specific issues have also led to a high number of complaints from Maple Ridge and the City of North Vancouver in some years. In most jurisdictions, the most common type of complaint relates to odour (Figure 3).

Figure 1 Number of air quality complaints received each year for the years 2011 to 2025

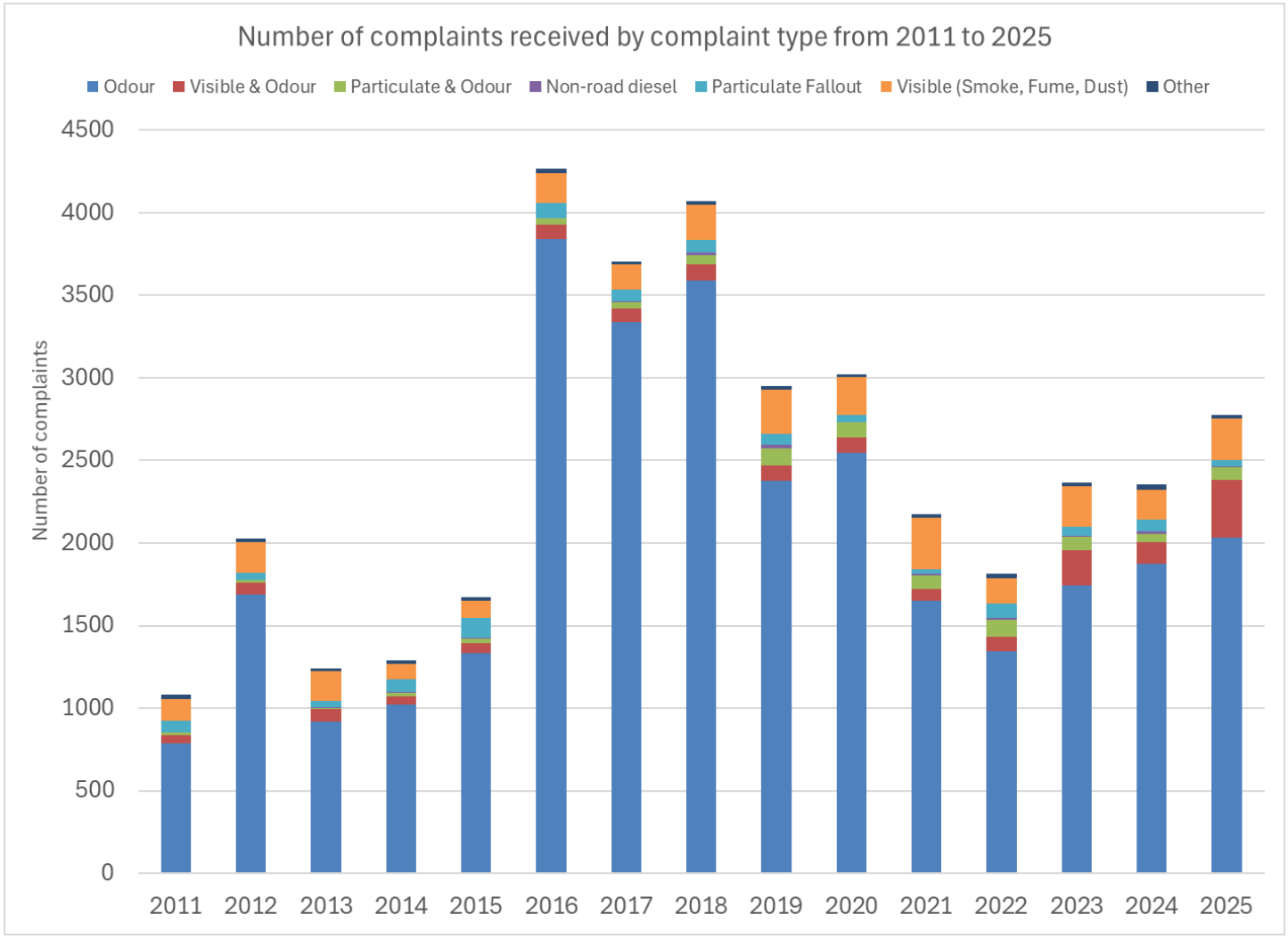


Figure 2 Number of air quality complaints received each year by jurisdiction for the years 2021 to 2025

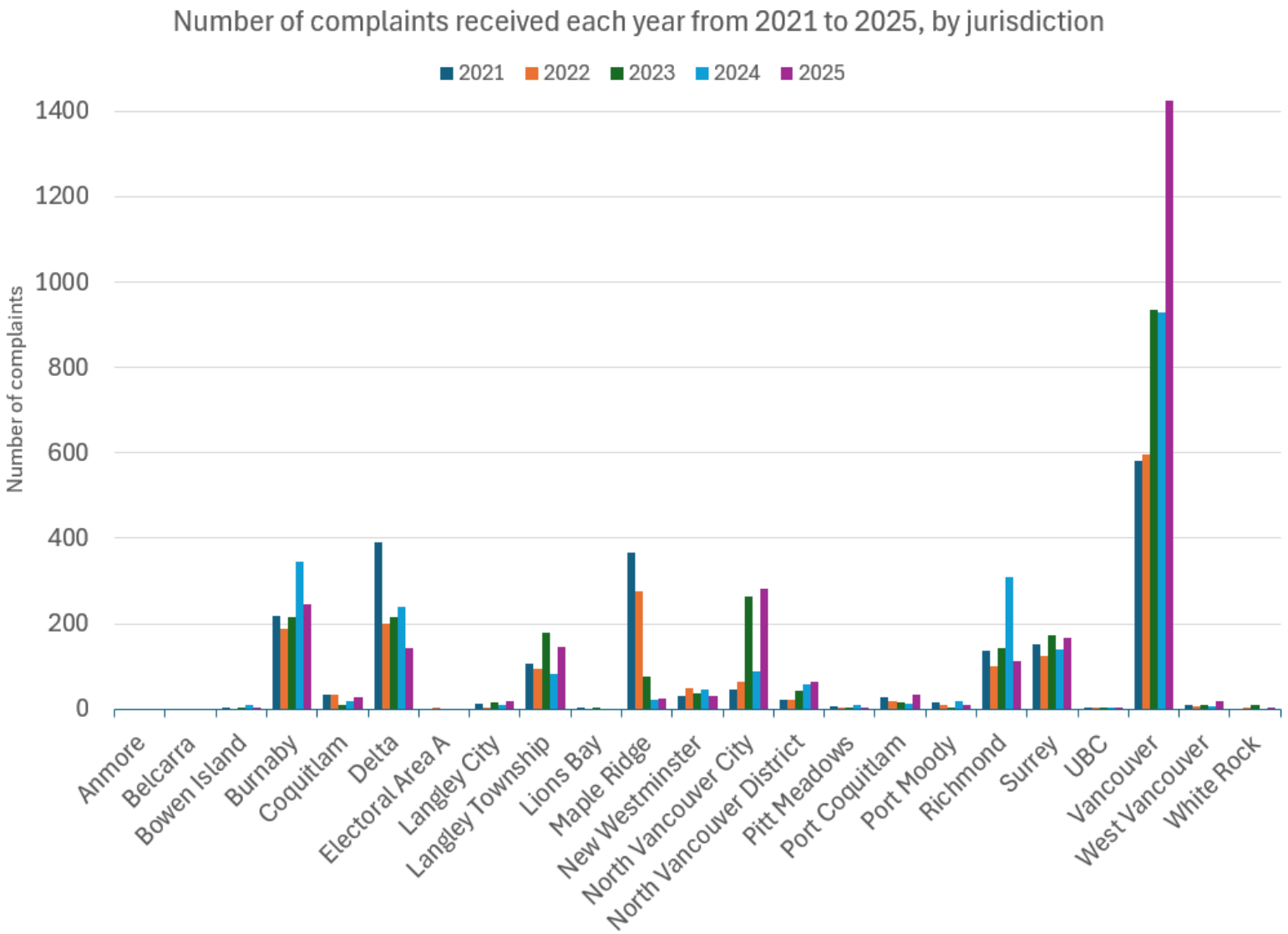
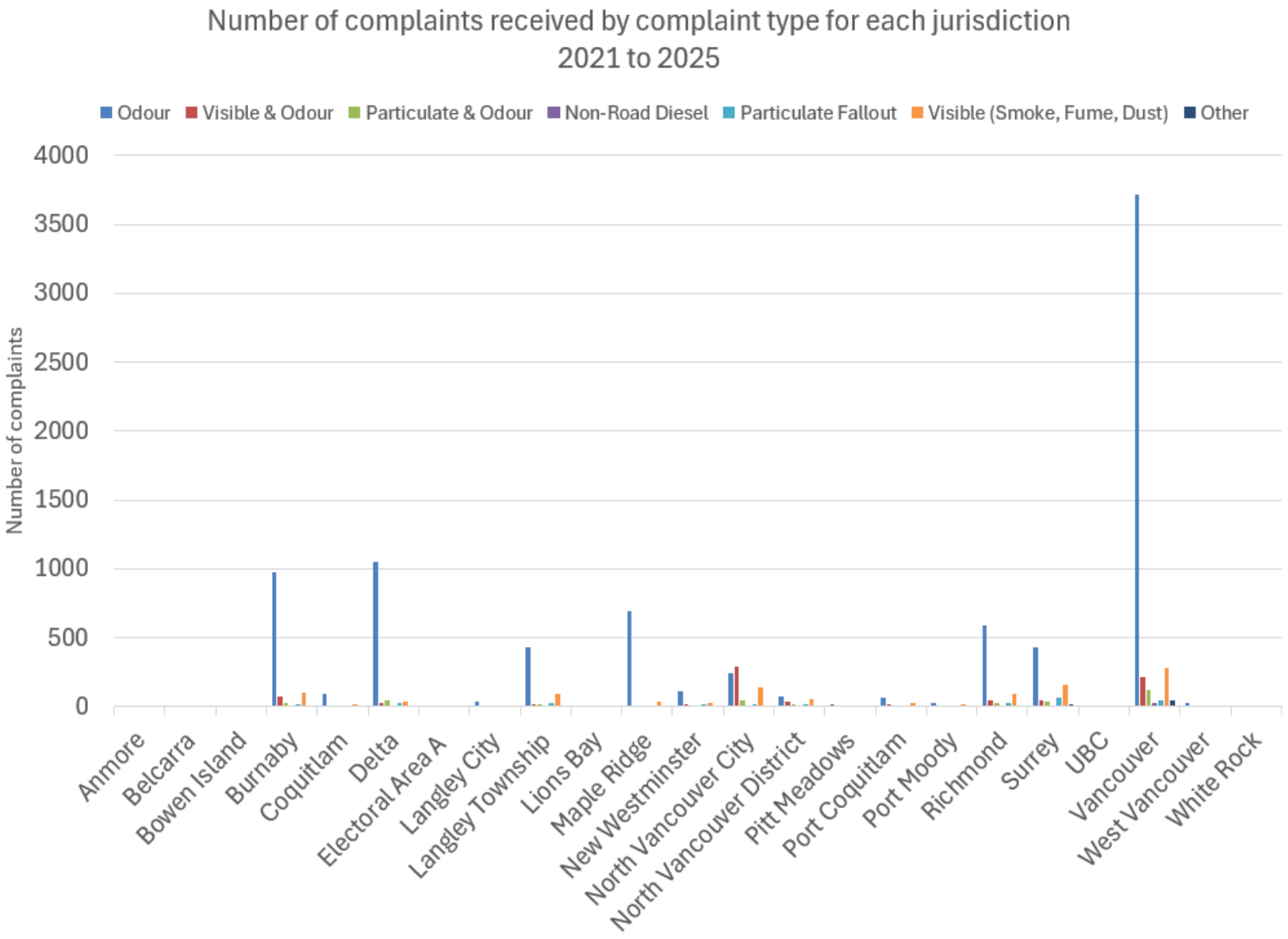
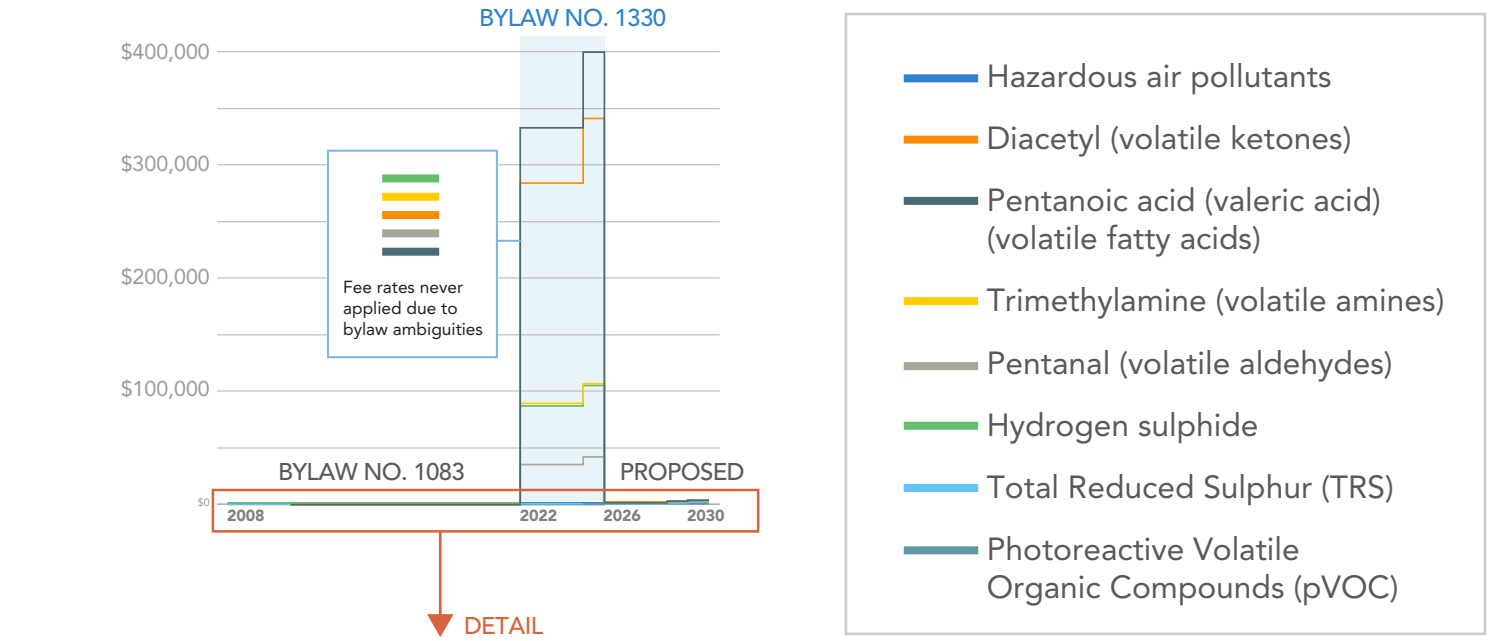
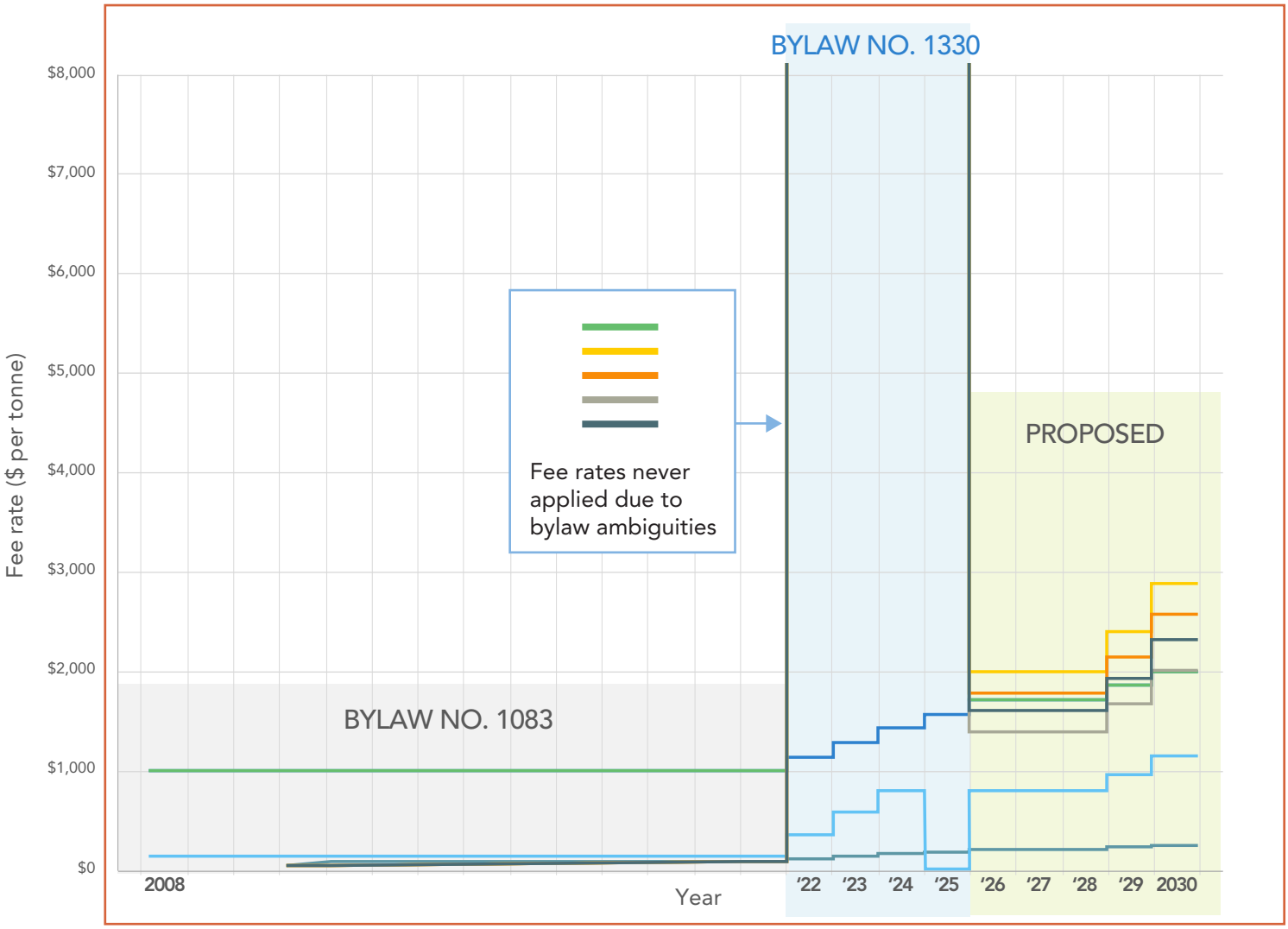


Figure 3 Number of air quality complaints received for each complaint type by jurisdiction, over the five-year period 2021 to 2025



FEE RATES FOR ODOROUS AIR CONTAMINANTS (2008–2030)





metrovancouver
SERVICES AND SOLUTIONS FOR A LIVABLE REGION

To: Air Quality Committee

From: Derek Jennejohn, Lead Senior Engineer, Air Quality and Climate Action Services
Jay Soper, Communications Specialist, External Relations

Date: March 26, 2026 Meeting Date: April 10, 2026

Subject: **Overview of Air Quality Communications Tools**

RECOMMENDATION
THAT the MVRD Board receive for information the report dated March 26, 2026, titled "Overview of Air Quality Communications Tools".

EXECUTIVE SUMMARY
This report provides an overview of the tools and approaches Metro Vancouver uses to communicate air quality information to the public. Communication helps to protect public health and encourage regulatory compliance. The tools include real-time air quality data platforms, public education displays, year-round social media, bylaw compliance communications, and air quality warnings. Used together, these tools allow Metro Vancouver to deliver timely public guidance and identify trends — particularly during wildfire smoke or degraded air quality events — while reinforcing its role in monitoring, planning, regulating, and enforcing air quality protection. Access to reliable, timely air quality information can help residents and businesses make cost-effective decisions and contributes to reducing long-term health system costs.

PURPOSE
To update the Air Quality Committee and MVRD Board on Metro Vancouver's range of communication tools for conveying air quality information and bylaw requirements to the public.

BACKGROUND
This report responds to questions from the members of the Air Quality Committee about how Metro Vancouver communicates with the public regarding air quality management. Air quality communication is an integral component of Metro Vancouver's air quality management service, which is enabled through the BC *Environmental Management Act* and Metro Vancouver bylaws.

AIR QUALITY COMMUNICATION TOOLS AND APPROACHES

AirMap (Real-Time Monitoring): AirMap provides online, real-time air quality data from 31 monitoring stations at airmap.ca. It displays the Air Quality Health Index, pollutant levels, and trends, offering residents immediate access to local air quality conditions.

Monitoring Station Signage: Metro Vancouver enhances visibility and public understanding of its air quality monitoring network through on-site educational signage at air quality stations and by offering tours for media, stakeholders, and the public. These efforts highlight the importance of monitoring infrastructure in protecting regional air quality.

LumiAir Interactive Display: LumiAir is a portable public display that engages residents with real-time air quality data and comparisons with other major urban centres. It includes interactive visualizations of air quality changes during events like wildfire smoke and ozone episodes. LumiAir is touring the region in 2026.

Air Quality Warnings: Air Quality Warnings are issued when conditions become unhealthy. Warnings are communicated through Metro Vancouver's website, media releases, social media, and email alerts, ensuring rapid and widespread public notification. Messaging provides guidance on protective actions during events such as wildfire smoke or elevated ozone.

Bylaw Compliance Communication: Targeted communication supports compliance with air quality bylaws. Channels are tailored to audiences — for example, industry-focused communications on LinkedIn and physical mail-outs for rural open burning. These communication approaches help reduce emissions and support regulated communities in understanding requirements.

Social Media: Metro Vancouver uses social media to rapidly reach residents with air quality updates, educational content, and warnings. Year-round posts align with seasonal priorities and key dates such as Clean Air Day and World Asthma Day.

Website: Metro Vancouver's website centralizes air quality information, including warnings, bylaws, monitoring data, studies, and videos. Content includes videos explaining air quality services and warnings.

ALTERNATIVES

This is an information report. No alternatives are presented.

FINANCIAL IMPLICATIONS

Costs to support Metro Vancouver's air quality communications tools and approaches are accommodated within the annual operating budget. Some of these approaches are deployed within the Fraser Valley Regional District, supported by cost recovery under the long-term MVRD-FVRD agreement that includes various air quality services. Access to reliable, timely air quality information can help residents and businesses make cost-effective decisions, and, by supporting actions that protect health, these communications also contribute to reducing long-term health system costs.

OTHER IMPLICATIONS

Coordinated communication tools strengthen consistency and clarity for member jurisdictions and support their ability to share air quality information with residents. Metro Vancouver collaborates with First Nations by responding to air quality concerns and questions and deploying air quality monitoring equipment. The communication approaches align with the *Clean Air Plan* and *Climate 2050*, and public communication supports Metro Vancouver's responsibility to providing transparent, evidence-based, and timely public guidance.

CONCLUSION

Metro Vancouver uses a suite of communication tools to ensure residents understand air quality conditions, related health risks, and its role in monitoring and managing the region's air quality. These tools increase public awareness, encourage compliance, and provide guidance to protect health when air quality is poor.

ATTACHMENT

1. Presentation re: Overview of Air Quality Communications Tools Presentation, dated April 10, 2026.

82519190

View of Vancouver from the Shipyards Pier in North Vancouver (June 16, 2020)

Overview of Air Quality Communication Tools

Derek Jennejohn
Lead Senior Engineer, Air Quality and Climate Action Services

Jay Soper
Communications Specialist, Corporate Communications

Air Quality Committee Meeting, April 10, 2026
82705974

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1

WHY WE COMMUNICATE ABOUT AIR QUALITY

- Protect health
- Inform
- Raise awareness
- Support compliance

Wildfire smoke in North Vancouver, B.C. (August 2017)

2

AIR QUALITY COMMUNICATIONS STRATEGY

- Help residents take health-protective actions
- Enhance understanding
- Build trust
- Engage communities
- Connect air quality and climate

580

fewer annual deaths due to cleaner air

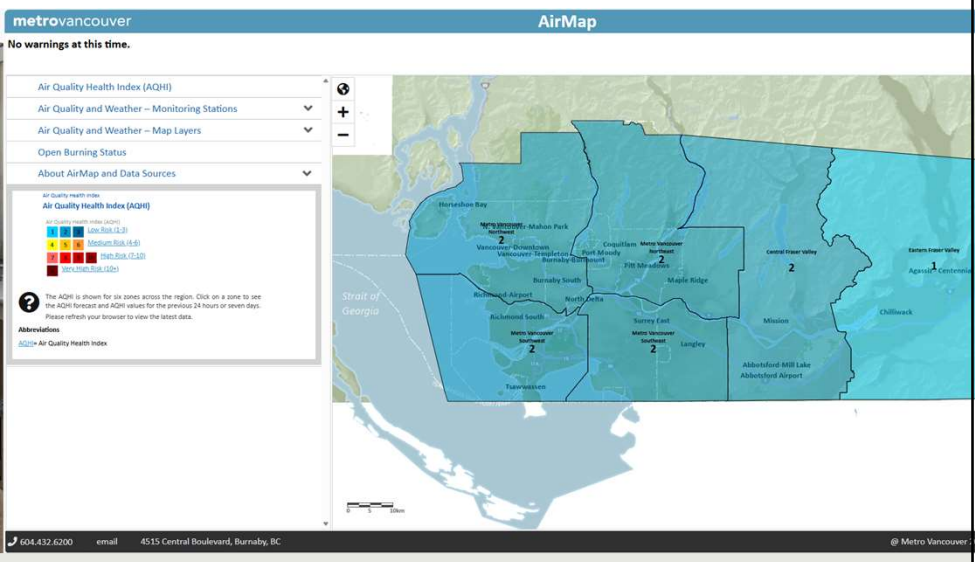
- Health Canada, 2024*

* Fuller-Thomson, E. G., Pappin, A. J., Rouleau, M., Xi, G., van Donkelaar, A., Martin, R. V., & Burnett, R. T. (2024). Mortality Attributable to Ambient Fine Particulate Matter Exposure in a Changing Canadian Population, 2001 to 2021. ACS ES&T Air, 1(9), 1177–1189. https://doi.org/10.1021/acsestair.4c00130.

AIR QUALITY MONITORING – AIRMAP

Online, real-time data from 31 monitoring stations

Inside a Metro Vancouver air quality monitoring station



AIR QUALITY MONITORING – STATION SIGNAGE

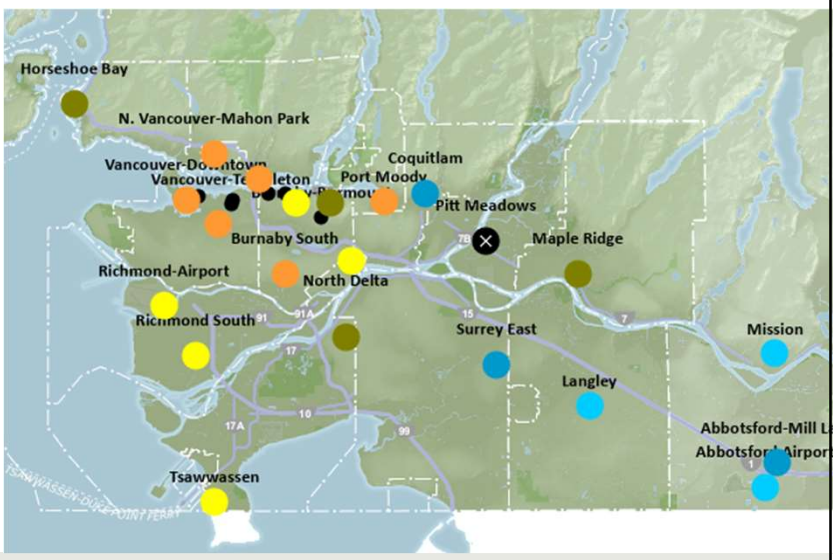
Port Moody air quality monitoring station

5

COMMUNICATING AIR QUALITY – AIRMAP

AirMap.ca provides timely, at-a-glance information for users

Wildfire smoke in Richmond, B.C. (September 2020)



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COMMUNICATING AIR QUALITY – LUMIAIR

- Interactive air quality education display
- Portable public installation
- On tour in 2026

LumiAir at the PNE Showcase, August 2025

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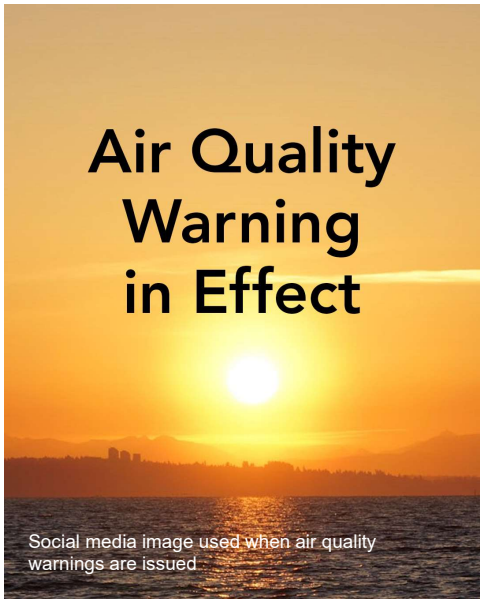
COMMUNICATING AIR QUALITY – WARNINGS

- Warn residents when air quality is degraded
- Issued through website, media releases, social media, and email alerts
- Clear public guidance on protective actions



Social media image used when air quality warnings are issued

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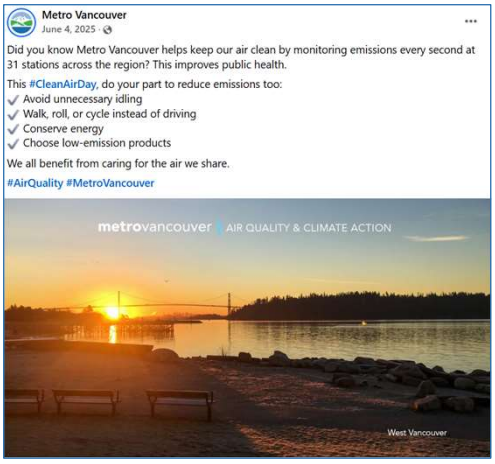
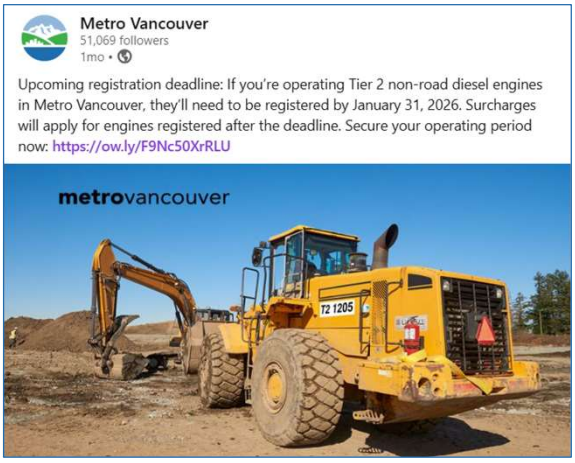
8

COMMUNICATING REGULATIONS

Targeted promotions for bylaws

SOCIAL MEDIA





YEAR-ROUND COMMUNICATION

2026 Communications	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Air Quality Service & Monitoring												
Air Quality Service	■	■	■	■	■	■	■	■	■	■	■	■
LumiAir on tour			■	■	■	■	■	■	■			
Metro Vancouver PNE Showcase								■				
International Days related to air quality				■	■	■			■			
Air Quality Warnings					■	■	■	■				
Regulations/Bylaws												
Non-Road Diesel Engines - Registration	■									■	■	■
Open Outdoor Burning			■	■	■					■	■	
Wood Smoke Reduction Program					■	■	■	■	■			
Residential Indoor Wood Burning					■				■	■		

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WEBSITE

Central hub for AQ information and regulations

Air Quality Data and Warnings
Real-time data, current air quality warning status, and general air quality information. →

Current Visual Air Quality
Visit clearairbc.ca and click on "Community" to view the latest images of air quality. →

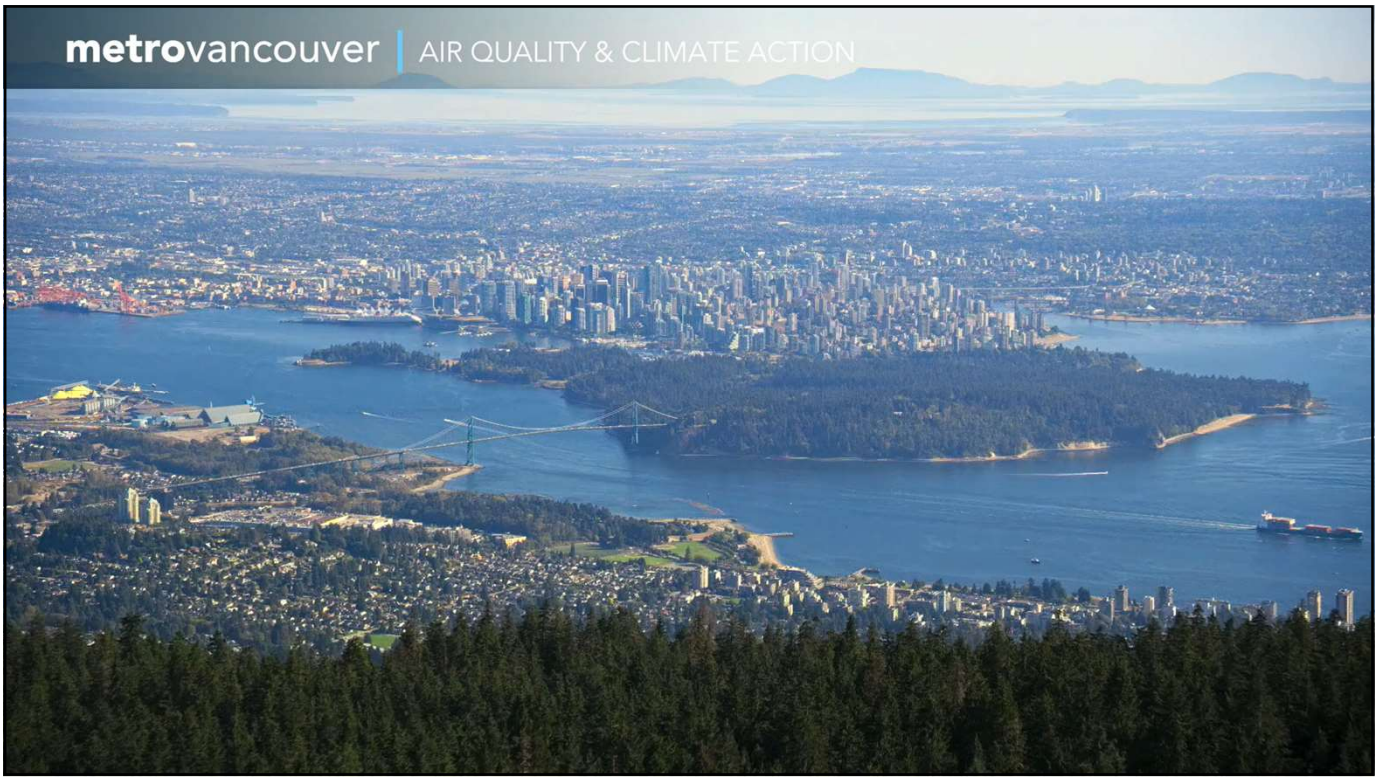
Wildfire Smoke and Air Quality
Information about wildfire smoke, including how you can protect your health and prepare for wildfire smoke events. →

Make An Air Quality Complaint
Submit a complaint about odour, dust, or other air contaminant →

Air Quality - Metro Vancouver Regional Services

Non-Road Diesel Emissions Bylaw 2023

12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Questions?
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SERVICES AND SOLUTIONS FOR A LIVABLE REGION

To: Air Quality Committee

From: Conor Reynolds, Director, Air Quality and Climate Action Services

Date: March 11, 2026 Meeting Date: April 10, 2026

Subject: **Manager's Report**

RECOMMENDATION
That the Air Quality Committee receive for information the report dated March 11, 2026, titled "Manager's Report".

AIR QUALITY COMMITTEE 2026 WORK PLAN
Attachment 1 sets out the Committee's Work Plan for 2026. The status of work plan priorities is indicated as pending, in progress, or complete. The work plan is updated, as needed, to include new priorities that arise, items requested by the Committee, and changes to the schedule.

RESULTS OF CLEAN BC INDEPENDENT REVIEW
On May 7, 2025, the BC Government launched an independent review of *CleanBC,* its primary policy framework for reducing province-wide GHG emissions. Metro Vancouver coordinated with member jurisdictions to identify shared priorities for provincial climate action based on approved plans and direction, and local government staff provided input to the independent reviewers. A summary of local government input to the review, with potential implications of the review recommendations for local governments, can be found in Community Energy Association's report "The CleanBC Review and Communities –Summary of the Recommendations and Implications for Local Governments" (Reference 2).

The *CleanBC* Independent Review Final Report (Reference 1) was released November 26, 2025. The review concluded that many *CleanBC* policies are working well to support residents and businesses to improve efficiency and choose clean technologies, such as by installing heat pumps and switching to electric vehicles. However, the report found that many policies are not yet achieving their full potential, and that expanded fossil natural gas production and liquified natural gas (LNG) development could significantly undermine emissions reductions from other sectors.

The report recommends a renewal of *CleanBC* with clearer priorities and actions that are both achievable and flexible, and it makes seven recommendations for provincial action. Input from Metro Vancouver and other local governments is generally well reflected in the review's recommendations, including the following:

- **Accelerate clean electricity production and electrification** as the foundation for energy security and economic growth, including coordinated inter-utility energy planning and improvements to utility planning and review to support increased electrification.
- **Make it easier for British Columbians to cut energy bills and climate pollution,** including through expanded access to rebates and efficiency programs for clean technologies such as heat pumps and electric vehicles.
- **Support BC industries to become cleaner and more competitive**, including by recycling carbon pricing revenue into climate pollution reduction programs.

- **Deepen partnerships with First Nations and local governments**, including by maintaining and expanding predictable, long-term funding such as the Local Government Climate Action Program.

Staff anticipate the BC Government will respond to the independent review in 2026, and staff will report back to the Committee with any arising actions or legislative changes relevant to local governments.

CHANGES TO FEDERAL AND PROVINCIAL ELECTRIC VEHICLE POLICIES AND PROGRAMS

On February 5, 2026, the Government of Canada announced that it will be developing stronger greenhouse gas vehicle emissions standards and repealing the Electric Vehicle (EV) Availability Standard (Reference 3). The emissions standards will be enacted through amendments to the 2010 *Passenger Automobile and Light Truck Greenhouse Gas Emission Regulations*, the purpose of which is to set standards for the efficiency of vehicles and light trucks to reduce emissions and align with US standards set by the US Environmental Protection Agency.

These changes are positioned as part of a strategy to support Canada's auto industry and "put Canada on a path to achieve a goal of 75% EV sales by 2035 and 90% EV sales by 2040". Details on proposed regulatory amendments and implementation are anticipated later in 2026. The strategy also includes renewed federal EV purchase incentives as part of a five-year EV Affordability Program, and a commitment to invest $1.5 billion in EV charging. The shift to performance-based emissions standards is framed as providing more flexibility for manufacturers, with increased EV sales implied. There will no longer be a direct EV sales mandate with legislated targets at the federal level.

The BC Government is in the process of reviewing the BC *Zero-Emission Vehicle (ZEV) Act* to adjust EV sales requirements in BC. Currently, the *ZEV Act* requires manufacturers to sell 90% ZEVs by 2030 and 100% ZEVs by 2035. The *CleanBC* review panel recommended easing the targets to 50% - 60% in 2030 and 90% in 2035. In February 2026, the Ministry of Energy and Climate Solutions invited feedback on proposed changes, proposing sales targets in the ranges of 35% to 55% by 2030 and 70% to 90% by 2035. Metro Vancouver staff provided technical feedback (Reference 4) including support for the targets to be eased to 55% or higher in 2030 and 90% in 2035, in alignment with *CleanBC* review recommendations and anticipated market trends.

ATTACHMENT

1. "Air Quality Committee 2026 Work Plan", dated March 11, 2026.

REFERENCES

1. Province of British Columbia. (November 2025). *CleanBC Independent Review Final Repor*t. Retrieved from: https://engage.gov.bc.ca/app/uploads/sites/121/2025/11/CleanBC-Independent-Review-Final-Report-November-2025.pdf.
2. Community Energy Association. (December 2025). *The CleanBC Review and Communities – Summary of the Recommendations and Implications for Local Governments*. Retrieved from: https://www.communityenergy.ca/wp-content/uploads/2025/12/The-CleanBC-Review-and-Communities-2025-12-03.pdf.
3. Government of Canada. (February 2025). *Prime Minister Carney launches new strategy to transform Canada's auto industry*. Retrieved from: https://www.pm.gc.ca/en/news/news-releases/2026/02/05/prime-minister-carney-launches-new-strategy-transform-canadas-auto.
4. Metro Vancouver Staff Feedback on the BC Zero-Emission Vehicle Act and Regulation - 2026 Engagement Paper.

Air Quality Committee 2026 Work Plan

Report Date: March 11, 2026

1st Quarter Priorities	Status
Air Quality Committee 2026 Meeting Schedule and Work Plan	Complete
Amendments to Air Quality Management Fees Regulation Bylaw	In Progress
BCUC Proceeding on BC Hydro's 2025 Integrated Resource Plan	Complete
Amendments to Boilers and Process Heaters Emission Regulation Bylaw	Pending
2026 Update on Regional District Sustainability Innovation Fund Projects	Pending
Overview of Air Quality Communications Tools	In Progress
2nd Quarter Priorities	
Overview of Air Quality Warning Program and Preparedness for 2026 Season	Pending
Amendments to Ticketing Bylaws	In Progress
Outcome of BC Utilities Commission Decisions	Pending
BC Retrofit Accelerator Update	Pending
Electric Vehicle Curbside Charging Guide	Pending
Prioritization Matrix for Flood-related Capital Projects	Pending
Regional Flood Resiliency Planning Processes – Update	Pending
3rd Quarter Priorities	
Annual Regional Air Quality Report	Pending
Appointment of Enforcement Officers	Pending
2024 Greenhouse Gas Emissions Inventory Update	Pending
Update to Regional Ground Level Ozone Strategy	Pending
Update on Regional Hazard, Risk, and Vulnerability Assessment	Pending
2026 Regional District Sustainability Innovation Fund Applications	Pending
4th Quarter Priorities	
Annual Budget and Five-Year Financial Plan	Pending
Report on 2026 Air Quality Warning Season	Pending
Report on Corporate Energy and GHG Management	Pending
Update on Regional Toxic Air Contaminant Risk Assessment	Pending
Regional Flood Resiliency Planning Processes – Update	Pending

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SERVICES AND SOLUTIONS FOR A LIVABLE REGION

To: Air Quality Committee

From: Paul Henderson, General Manager, Solid Waste Services

Date: February 3, 2026 Meeting Date: March 6, 2026

Subject: **Initial Draft Solid Waste Management Plan**

The attached report dated January 22, 2026, titled "Initial Draft Solid Waste Management Plan" was received for information by the Zero Waste Committee on February 5, 2026.

The report is provided to the Air Quality Committee for information. The initial draft of the Solid Waste Management Plan contains a number of actions aimed to reduce greenhouse gas emissions, and achieving carbon neutral solid waste operations by 2050 is among the targets identified in the plan.

ATTACHMENTS

1. "Initial Draft Solid Waste Management Plan", dated January 22, 2026.

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SERVICES AND SOLUTIONS FOR A LIVABLE REGION

To: Zero Waste Committee

From: Terry Fulton, Senior Project Engineer, Solid Waste Services

Date: January 22, 2026 Meeting Date: February 5, 2026

Subject: **Initial Draft Solid Waste Management Plan**

RECOMMENDATION
THAT the Zero Waste Committee receive for information the report dated January 22, 2026, titled "Initial Draft Solid Waste Management Plan".

EXECUTIVE SUMMARY
The Zero Waste Committee and GVS&DD Board have received updates at each phase of the solid waste management plan update process, including approving goals and a waste hierarchy for the updated plan in 2025.

An initial draft of the updated solid waste management plan is now published on the Metro Vancouver website. Feedback will help shape a revised draft that will be provided to the Zero Waste Committee and GVS&DD Board, followed additional public comment opportunities prior to submitting the final draft plan to the Minister of Environment and Parks for approval.

The initial draft plan includes 30 strategies and 117 actions, highlighting priorities such as multi-family waste reduction, construction and demolition, infrastructure, residuals management, and cross-sector collaboration to advance a circular economy. Many of the actions help to address challenges observed in solid waste data, including actions to support multi-family and construction and demolition recycling. Affordability is embedded in the solid waste management plan's guiding principles and will be a key consideration as plan actions are implemented. Member jurisdiction actions are intended as potential areas of focus for members to consider – they are not requirements.

The updated plan will help Metro Vancouver build on its success as a North American leader in waste reduction and recycling.

PURPOSE
The purpose of this report is to provide information to the Zero Waste Committee on components of the initial draft updated solid waste management plan and provide an opportunity for discussion and comment at the February 5, 2026 Zero Waste Committee meeting.

BACKGROUND
Regional districts are required to develop solid waste management plans under the *Environmental Management Act*, to be approved by the BC Minister of Environment and Parks. Provincial guidelines also recommend initiating a plan review every 10 years. In November of 2019 the GVS&DD Board authorized initiating an update of the regional solid waste management plan.

The Zero Waste Committee and GVS&DD Board have received updates at each phase of the solid waste management plan update process. In July 2025, the GVS&DD Board approved goals and a waste hierarchy for the updated plan. The following graphic shows the phases of the plan update process. We are currently in the last phase of plan development – draft plan.

SOLID WASTE MANAGEMENT PLAN INITIAL DRAFT

The initial draft solid waste management plan is publicly available on the Metro Vancouver website (Reference 1). Feedback from all phases of engagement, including the recent options analysis phase, was considered in developing the initial draft solid waste management plan. A full engagement summary report from the options analysis phase will be provided to the Zero Waste Committee and GVS&DD Board at an upcoming meeting.

Key components of the draft solid waste management plan include:

- Vision and guiding principles – *approved by GVS&DD Board in June 2024*
- Goals and waste hierarchy – *approved by GVS&DD Board in July 2025*
- Targets and performance indicators
- 30 Strategies and 117 actions organized by the levels of the waste hierarchy
- Regulatory strategic approach
- Recycling and waste centre strategic approach
- Residual management strategic approach
- Financial overview

Strategies and Actions – Highlights

Strategies and actions in the initial draft solid waste management plan are specific initiatives to help achieve the plan's goals and targets. The strategies and actions are organized according to the levels of the waste hierarchy, and reflect the themes and priorities heard from residents and businesses in the region. Many of the actions also respond to trends in Metro Vancouver's solid waste data. In particular, actions that support waste reduction and recycling in the multi-family and construction and demolition sectors. The plan also includes member jurisdiction actions, recognizing both that members have an important role to play to accomplish the goals of the plan and the role of collaboration between Metro Vancouver and members. Member jurisdiction actions are potential areas of focus – not requirements – and were developed in collaboration with member staff.

RETHINK: 4 strategies, 22 actions.

Sample actions:

- 1.1.3 Advocate for circular economy policies across Canada
- 1.2.1 Facilitate cross-sector waste prevention discussions
- 1.2.5 Develop, test, and share circular procurement approaches, tools, and templates. (*Member Jurisdiction Action*)

REDUCE: 3 strategies, 13 actions

Sample actions:

- 2.1.1 Develop solutions for construction and demolition sector waste reduction
- 2.1.4 Support tools and education for business

- 2.1.8 Develop, test and share definitions and approaches for zoning and development bylaws to clarify siting requirements for waste reduction and recycling activities. (*Member Jurisdiction Action*)
- 2.2.3 Support multi-family waste reduction through education
- 2.3.1 Reduce food loss and waste in collaboration with businesses

REUSE: 7 strategies, 25 actions
Sample actions:

- 3.1.1 Advocate for reusable food service ware requirements for non-residential sectors.
- 3.1.3 Update the regionally harmonized approach to reducing single-use items and phasing in reuse measures. (*Member Jurisdiction Action*)
- 3.2.1 Advocate for additional extended producer responsibility programs such as mattresses
- 3.3.3 Increase reuse in the construction and demolition sector
- 3.4.3 Develop, test and share best practices for waste reduction and recycling for public realm events, prioritizing surplus food redistribution, use of reusable food service ware, and litter reduction. (*Member Jurisdiction Action*)
- 3.5.1 Scale up reuse at Metro Vancouver solid waste facilities
- 3.5.5 Facilitate opportunities to increase the size, number, and frequency of repair and reuse events such as community garage sales, repair cafes, and clothing swaps. (*Member Jurisdiction Action*)
- 3.6.1 Scale a regional food recovery network
- 3.7.2 Promote reusable items for a diverse audience

RECYCLE: 8 strategies, 27 actions
Sample actions:

- 4.1.1 Explore solutions to improve recyclability
- 4.1.2 Work with engineering design and construction organizations to include recycled asphalt and concrete in roads, fill, and other applications. (*Member Jurisdiction Action*)
- 4.2.1.1 Reduce barriers for siting recycling activities
- 4.3.2 Increase participation and reduce contamination in organics programs
- 4.4.3 Update, test, and share multi-family residential (including small scale multi-unit housing) waste and recycling container space and access technical specifications to support adequate space for expanded recycling. (*Member Jurisdiction Action*)
- 4.4.4 Advocate for, test, and share consistent approaches to improve public space waste reduction and recycling. (*Member Jurisdiction Action*)
- 4.6.1.2 and 4.6.2 Provide tailored education for sectors such as events, tourism, health care and multi-family
- 4.8.2 Create incentives for waste and recycling collectors to work with their customers to adopt additional recycling services and reduce waste
- 4.8.4 Review and expand disposal ban program where possible

RECOVER: 2 strategies, 6 actions
Sample actions:

- 5.1.3 Pursue beneficial use of bottom ash in cement plants
- 5.2.2 Recover materials and fuels from construction and demolition material

DISPOSE: 6 strategies, 24 actions
Sample actions:

- 6.1.3.1 Explore opportunities to reduce reliance on remote private contingency disposal facilities through optimized use of the Vancouver Landfill and the Waste-to-Energy Facility.
- 6.3.1 Explore long-term additional disposal capacity if required.

Engagement on Initial Draft Solid Waste Management Plan
Metro Vancouver has shared the initial draft plan and invited comments from First Nations, member jurisdiction staff, neighbouring regional district staff, the Solid Waste Management Plan Public/Technical Advisory Committee, the Solid Waste and Recycling Industry Advisory Committee, provincial staff, and others. The initial draft plan is publicly available on the Metro Vancouver website for any interested parties to provide feedback until February 20, 2026. Opportunities for feedback include scheduled advisory committee meetings, written feedback, the option to request a meeting or phone call, and an online discussion board where participants can post comments and respond or react to others' comments.

Next Steps to Finalize the Solid Waste Management Plan
Metro Vancouver anticipates completing the solid waste management plan update process and submitting the final draft plan to the Minister of Environment and Parks in 2026. The steps remaining to finalize the solid waste management plan include:

- Revising the draft plan, if necessary, following feedback on the initial draft
- Providing the revised draft plan to the Zero Waste Committee and GVS&DD Board for consideration
- Launching a comment period on the revised draft plan
- Submitting a final draft plan, along with any revisions and additional feedback during the comment period, to the Minister of Environment and Parks for approval. Any major proposed revisions would be brought back to the Zero Waste Committee and Board for consideration before submission to the Minister of Environment and Parks

ALTERNATIVES
This is an information report. No alternatives are presented.

FINANCIAL IMPLICATIONS
Affordability is embedded in the solid waste management plan's guiding principles and will be a key consideration as plan actions are implemented.

The draft solid waste plan specifies that actions in the plan requiring Metro Vancouver expenditures will be brought forward for consideration by the GVS&DD Board through the regular budget process, prioritizing actions where business casing shows the highest potential to advance solid waste management plan primary and secondary metrics. Annual reporting on progress to achieve the targets of the solid waste management plan will assist in prioritizing funding and informing where investments can be most strategically allocated.

OTHER IMPLICATIONS
The initial draft solid waste management plan includes specific member jurisdiction actions, which have been reviewed by member jurisdiction staff and revised to incorporate feedback. The member jurisdiction actions are intended as potential areas of focus for members to consider – they are not requirements.

CONCLUSION
Metro Vancouver published an initial draft updated solid waste management plan on the Metro Vancouver website and shared it with interested parties for feedback. Feedback heard before February 20, 2026, will be considered as a revised draft is developed and provided to the Zero Waste Committee and GVS&DD Board for consideration. This will be followed by an additional public comment period. A final draft solid waste management plan, including any revisions and feedback from the public comment period, will be included as part of the plan submission to the Minister of Environment and Parks.

ATTACHMENTS

1. Presentation re: Initial Draft Solid Waste Management Plan.

REFERENCES

1. Metro Vancouver. (2026). Initial Draft Solid Waste Management Plan. Initial Draft Solid Waste Management Plan

82085222


Initial Draft Solid Waste Management Plan
WALKTHROUGH
Terry Fulton, P.Eng.
Senior Project Engineer, Solid Waste Services
Zero Waste Committee, February 5, 2026
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PLAN TIMELINE
Pre-Engagement Committee Formation
Vision and Guiding Principles
Idea Generation
Options Analysis
Draft Plan
Plan Approval
we are here
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2

2

INITIAL DRAFT SOLID WASTE MANAGEMENT PLAN

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3

VISION AND GUIDING PRINCIPLES

Complete

"A thriving region where nothing is wasted and resources are valued."

- A solid waste and recycling system that is affordable, convenient, and consistent across the region.
- A solid waste system that is resilient to climate change and future challenges.
- Accountability from residents, businesses, and governments to prevent waste.
- Environmental stewardship and climate action.
- Inclusive solid waste services and programs.
- Innovation and collaboration to support a vibrant regional economy that keeps products and materials in circulation.
- Transparency about what happens to waste and recycling.

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HIERARCHY AND GOALS

Complete

Goals	Components
1. Enable circular systems that preserve resources	• Design waste-free systems • Transition to a circular economy
2. Minimize waste generation	• Prevent • Use less
3. Keep materials in use as long as possible	• Share/Donate • Repair/Refurbish • Repurpose
4. Make it easier to recycle effectively	• Recycle into new products • Compost and anaerobic digestion
5. Recover resources from non-recyclable materials	• Recover materials from the waste stream • Create alternatives to fossil fuels
6. Dispose only as a last resort	• Landfill and mass burn waste-to-energy

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DRAFT 2050 TARGETS

2025 Baseline

20% Reduction in Waste Generation Per Capita by 2050
(10% by 2040)

80% Diversion / 75% Recycling by 2050
(75% / 70% by 2040)

50% Reduction in Disposal Per Capita by 2050
(30% by 2040)

Carbon Neutral by 2050
(45% reduction by 2030)

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RETHINK

4 Strategies, 15 Actions

- 1.1 Advocate for circular economy policies and programs
- 1.2 Help lead the transition to a more circular regional economy through waste prevention
- 1.3 Collaborate to advance a circular economy
- 1.4 Collect and share data to track progress toward a circular economy

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REDUCE

3 Strategies, 13 Actions

Symbol indicates strategies which include multi-family focused actions

- 2.1 Collaborate with businesses and institutions to reduce waste at the source
- 2.2 Encourage residents to reduce and prevent waste
- 2.3 Prioritize food waste reduction initiatives for the commercial and institutional sectors

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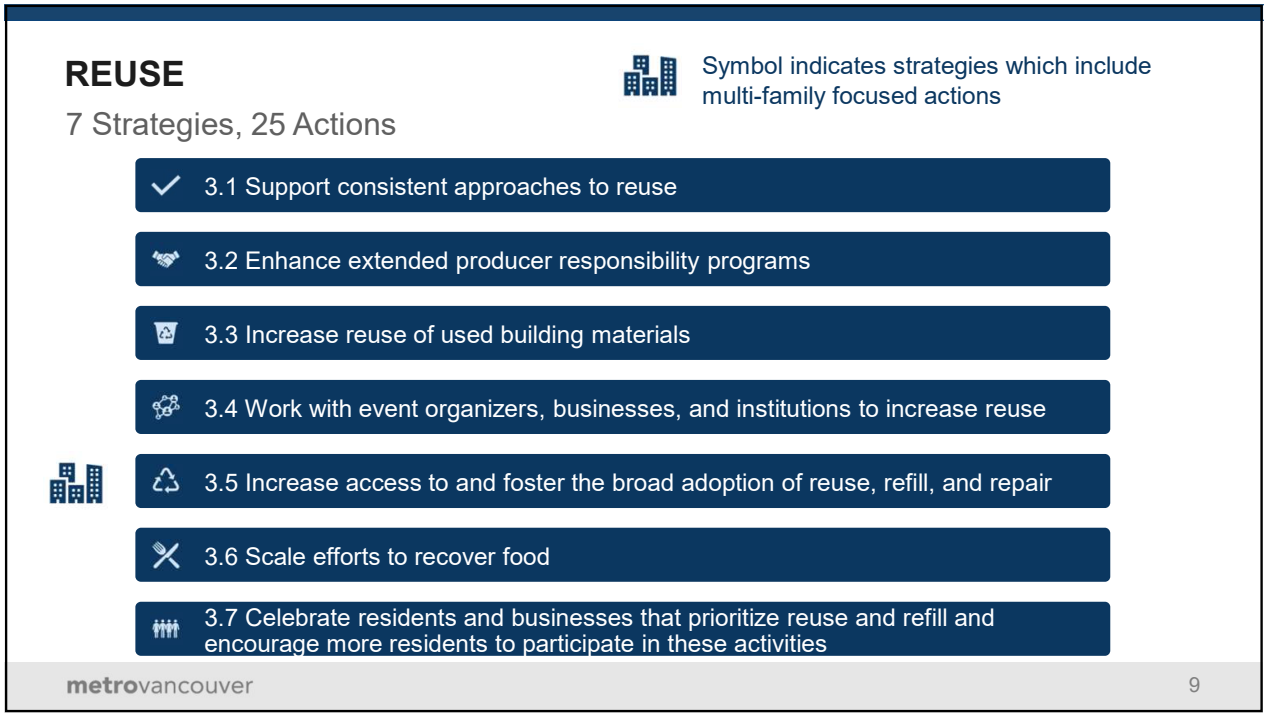
REUSE
7 Strategies, 25 Actions
Symbol indicates strategies which include multi-family focused actions
3.1 Support consistent approaches to reuse
3.2 Enhance extended producer responsibility programs
3.3 Increase reuse of used building materials
3.4 Work with event organizers, businesses, and institutions to increase reuse
3.5 Increase access to and foster the broad adoption of reuse, refill, and repair
3.6 Scale efforts to recover food
3.7 Celebrate residents and businesses that prioritize reuse and refill and encourage more residents to participate in these activities
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9


RECYCLE
8 Strategies, 27 Actions
Symbol indicates strategies which include multi-family focused actions
4.1 Promote design for recyclability and the use of recycled content in products and packaging
4.2 Encourage the development of new recycling infrastructure
4.3 Improve participation in green bin programs and alternatives for residents and businesses
4.4 Make recycling easier by improving convenience
4.5 Make recycling more effective by simplifying sorting
4.6 Provide tailored recycling education for the residential, commercial and institutional sectors
4.7 Increase transparency of what happens to materials from the recycling and green bin programs
4.8 Enhance approaches to Metro Vancouver's disposal ban program
metrovancouver
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RECOVER

2 Strategies, 6 Actions

- 5.1 Recover materials and energy from materials collected at regional facilities that are not currently recycled
- 5.2 Encourage recovery of materials and energy from construction and demolition materials that are not currently recycled

DISPOSE

6 Strategies, 24 Actions

- ✓ 6.1 Continue to use Vancouver Landfill and the Waste-to-Energy Facility as primary disposal systems
  - 6.1.1.1 Continue to work with the City of Vancouver to maximize landfill gas utilization
  - 6.1.1.2 Work with Vancouver to continue to further enhance environmental performance at the Vancouver Landfill
  - 6.1.2.1 Maximize utilization of energy generated at the Waste-to-Energy Facility through projects such as district energy
  - 6.1.2.2 Continue to further enhance environmental performance of the Waste-to-Energy Facility
  - 6.1.3.1 Explore opportunities to reduce reliance on remote private contingency disposal facilities through optimized use of the Vancouver Landfill and the Waste-to-Energy Facility

DISPOSE

6 Strategies, 24 Actions

- 6.2 Use suitable procurement processes for any contingency disposal requirements
- 6.3 Explore long-term additional disposal capacity if required
- 6.4 Monitor disposal options for waste that requires specialized disposal
- 6.5 Complete closure activities at the former Coquitlam Landfill
- 6.6 Prevent litter and illegal dumping

STEPS TO FINALIZE THE PLAN

Jan 22	Feb	March	April & May	June
Publish **initial draft plan**	Receive feedback on **initial draft plan**	Present revised draft plan to **Zero Waste Committee** and **GVS&DD Board**	**Comment period** on revised draft plan	**Submit** draft plan to Minister

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