



# Food Sector Grease Interceptor Bylaw Update

Final Engagement Summary

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## Acknowledgements

Thank you to everyone who provided input on the Food Sector Grease Interceptor Bylaw update. Metro Vancouver embraces collaboration and innovation to provide sustainable regional services that contribute to a livable and resilient region and a healthy natural environment for current and future generations.

The purpose of this engagement was to find ways to enhance compliance with this bylaw that protects private property, public sewer infrastructure, human health, and the environment. Engagement sought to identify factors hindering compliance and find potential bylaw amendments that could increase compliance.

We appreciate your time, and the insights and comments you shared with us during the three phases of engagement.

## About Metro Vancouver

Metro Vancouver is a diverse organization that plans for and delivers regional utility services, including water, 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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## About the Food Sector Grease Interceptor Bylaw

When fats, oils, and grease are washed down sinks and drains, they harden and lead to serious blockages. This can cause significant and costly damage to residential and commercial plumbing systems and the region's sewer system. It can also cause harm to the environment through sewer overflows. The main source of grease entering the sewer system comes from food sector establishments and residential homes. Metro Vancouver works to inform residents about the harmful effects of grease, and their role in disposing of it using their green bin, through **public education campaigns**. To manage the fats, oils, and grease coming from food sector

establishments, Metro Vancouver adopted the *Food Sector Grease Interceptor Bylaw* (No. 268) in 2012. This bylaw requires food sector establishments to have all grease-bearing fixtures connected to an appropriately sized and maintained grease interceptor. Grease interceptors separate fats, oils, and grease from wastewater and help prevent them from entering the sewer system. It's also important to note that having a properly-sized grease interceptor can protect businesses against grease blockages and the potential for resulting sewage backups, and as a result, the costs for plumbing repairs and any necessary renovations.

# About the Engagement Program

A review of the original Food Sector Grease Interceptor Bylaw (No. 268) was initiated in spring 2018. The first phase of engagement was comprised of small group meetings in late 2018 and early 2019 to discuss technical details of the bylaw, and stakeholders' experience of the current bylaw requirements. A meeting specific to Mandarin-speaking food service industry representatives was hosted based on interest from the community. The second phase occurred in late 2019 and involved engagement through working group and technical group meetings, as well as an online stakeholder survey. **During this phase of engagement, several proposed bylaw changes were developed, discussed, and generally agreed upon.**

The third and final phase of engagement on the proposed bylaw changes was intended to conclude in 2020, with engagement results and recommended bylaw amendments to be presented to Metro Vancouver's Liquid Waste Committee and Board for

review and approval. However, due to the COVID-19 pandemic, the conclusion of the bylaw review was put on hold, allowing the food services sector to concentrate on day-to-day business during a difficult time.

Metro Vancouver resumed the bylaw review and update in February 2023. A summary outlining the key themes and feedback received during the first two phases of engagement was posted online, and current members of industry were invited to comment on the proposed changes through an online survey. Stakeholders included members of the food services industry, grease interceptor manufacturers and maintenance providers, and building maintenance providers and associations. A complete list of stakeholders is included in the table below.

This report summarizes input received during all three phases of engagement, and informs the proposed bylaw changes put forward for Metro Vancouver's Liquid Waste Committee and Board's review and consideration.



The table below provides a summary of engagement activities including intended audiences.

ACTIVITY	AUDIENCE	TIMING	MEDIUM
<b>Invitation to take part in the bylaw update and engagement</b>	Food service industry and associations	Phase 1 2018	Letters, emails, phone calls, association newsletters and websites, Metro Vancouver website
<b>Small group meetings</b>	Representatives from: small/medium food service business associations, food service chains, grease haulers and maintenance providers, plumbers, grease interceptor manufacturers and maintenance providers, food waste-to-energy manufacturers, institutional kitchens, culinary schools, grocery stores, food trucks, digester and grinder industry, Building Officials Association of British Columbia	Phase 1 September – October 2018	In-person meetings
<b>Non-English speaking meetings (offered based on interest from the community)</b>	Mandarin-speaking food service industry representatives	Phase 1 October 2018	In-person meeting
<b>Online survey</b>	Food service industry and associations	Phase 1 Early 2019	Website
<b>Working group meeting</b>	Representatives from the following areas of the food sector industry: small restaurants, Mandarin-speaking food sector establishments, food sector establishment chains, plumbers, grease interceptor manufacturers and maintenance providers, grease haulers and biogas processors, food service business associations, City of Vancouver environmental bylaw enforcement	Phase 2 October 2019	In-person meeting
<b>Technical group meeting</b>	Technical representatives from the following groups: plumbers, grease interceptor manufacturers and maintenance providers, grease haulers and food waste energy processors	Phase 2 November 2019	In-person meeting
<b>Municipal engagement</b>	Local Government Fats, Oils, and Grease Working Group, Regional Engineer Advisory Committee – Liquid Waste Subcommittee	Phase 1 & 2 2018 – 2019	Presentations and discussion at regular meetings
<b>Online survey</b>	Food service industry and associations, grease haulers and maintenance providers, plumbers, grease interceptor manufacturers and maintenance providers, institutional kitchens, culinary schools, grocery stores, food trucks, Building Officials Association of British Columbia	Phase 3 February 2023	Website



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# Engagement Promotion

Engagement was promoted via letters, postcards, and emails to more than 17,000 stakeholders, and on the Metro Vancouver website. In addition to Metro Vancouver promotion, industry associations shared information about engagement opportunities with their membership.

## Website

A dedicated project webpage was used to highlight information about the proposed bylaw changes and engagement. As of May 2023, there have been 4,406 visits to the project website, and 3,329 unique page views.

## Online Surveys

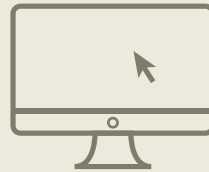
The opportunity to provide feedback in the online surveys was promoted on the Metro Vancouver website, by email and by postcard to more than 17,000 businesses and interested stakeholders, and at all meetings.

## What We Did

We conducted the following activities throughout engagement:



**17,350**  
stakeholders contacted  
through letters and emails



**4,406**  
visits to project website  
**3,329**  
unique page views



**62**  
online survey  
responses

# What We Heard and Metro Vancouver Response

These are some of the key themes we heard during engagement.

INTEREST AREA	WHAT WE HEARD AND HOW WE'VE RESPONDED
<p><b>Desire for exemptions</b></p>	<p><b>What we heard:</b> Requests for Metro Vancouver to consider bylaw exemptions – allowing businesses without grease interceptors, or insufficiently-sized interceptors, to remain that way if they were in existence prior to the introduction of the 2012 bylaw requirements.</p> <p><b>Response:</b> Because we're seeking continual system improvements, no exemptions are being considered. The bylaw is in place to protect the environment, sewer system, sewer workers, and the public. However, to support the food service industry, food sector establishments with existing, non-conforming grease interceptors may submit a compliance plan to Metro Vancouver for consideration, allowing them more time to come into compliance with the bylaw. The plan will need to include details on proposed modifications and an implementation schedule.</p>
<p><b>Installation and upgrade costs</b></p>	<p><b>What we heard:</b> Concerns about the cost of renovations to install or upgrade grease interceptors, as well as the potential lost revenue should the business need to close during these renovations.</p> <p><b>Response:</b> Food sector establishments with existing, non-conforming grease interceptors may submit a compliance plan to Metro Vancouver for consideration, allowing them more time to come into compliance with the bylaw. The plan will need to include details on proposed modifications and an implementation schedule.</p>
<p><b>Installation and upgrade costs, and the impacts of COVID-19</b></p>	<p><b>What we heard:</b> Restaurants faced significant financial difficulties during the COVID-19 pandemic, which they are still recovering from. Some accessed a federal Canada Emergency Business Account (CEBA) loan to remain operational and will need to pay back these loans in the coming years. The cost to install or upgrade grease interceptors to be in compliance with the bylaw could negatively impact their business in the face of multiple and competing financial demands.</p> <p><b>Response:</b> The proposed bylaw change removes some requirements from the previous bylaw (removing requirement for mop sinks and floor drains to be connected to a grease interceptor), intended to help lower the cost of grease interceptor installation. In many cases, the interceptor could be installed under the sink, rather than recessed in the floor, removing the need for extensive retrofits.</p> <p>In addition, food sector establishments may submit a compliance plan that will allow them more time to come into compliance with the bylaw. The plan will need to include details on proposed modifications and an implementation schedule.</p>
<p><b>Updating re-inspection and sampling fees</b></p>	<p><b>What we heard:</b> Concerns about increasing re-inspection and sampling fees, and the financial impact the increase could have on businesses. In other cases, questions about the financial justification for the fee increases.</p> <p><b>Response:</b> Metro Vancouver will generate no profit as a result of increases to the fees. The fees have not been updated since 2012, when the bylaw was first put in place. The increase is to better recover the operational costs of re-inspection and sampling, such as: staff time conducting work at the business and preparing inspection reports; laboratory analyses; and, vehicle mileage and gas.</p> <p>The proposed bylaw changes would increase the re-inspection fee from \$300 to \$500 (a fee charged to businesses that are in violation of the bylaw and require a re-inspection to confirm compliance). The sampling fee (charged in the event an enforcement officer needs to take samples of grease interceptor discharge) would increase from \$150 to \$300.</p>



INTEREST AREA	WHAT WE HEARD AND HOW WE'VE RESPONDED
<b>Residential versus commercial sources of fats, oils, and grease</b>	<p><b>What we heard:</b> Residential dwellings are a significant source of fats, oils, and grease in the wastewater system, and should also be addressed.</p> <p><b>Response:</b> Metro Vancouver regularly runs <b>public education campaigns</b> about keeping fats, oils, and grease out of the wastewater system. The 2022 campaign (which included a campaign website, television and online advertising, and ads on social media, YouTube, and Google) reached more than 800,000 residents</p>
<b>Alignment of standards and regulations</b>	<p><b>What we heard:</b> There is inconsistency between municipal, regional, and provincial jurisdictions when it comes to the interpretation of requirements and implementation. Suggestions made to establish a central resource that could be accessed by stakeholders to coordinate with the various jurisdictions—for example, when there is confusion regarding the precedence of building code versus bylaw requirements. Language around sizing requirements is unclear.</p> <p><b>Response:</b> Detailed information on selecting and sizing the right grease interceptor for businesses can be found on the Metro Vancouver <b>website</b>.</p> <p>Metro Vancouver will consider creating a central database of the different jurisdictional requirements relevant to grease interceptors.</p>
<b>Fixtures</b>	<p><b>What we heard:</b> Questions and concerns about what fixtures are or are not required to be connected to a grease interceptor (dishwashers, glass washers and sanitizers, mop sinks, and floor drains).</p> <p><b>Response:</b> Under the proposed bylaw changes:</p> <ul style="list-style-type: none"> <li>• Floor drains and mop sinks will not have to be connected to a grease interceptor. This change is being made based on feedback from industry and because these fixtures are not considered a significant source of grease. Removing this requirement helps reduce the financial burden of retrofits.</li> <li>• Dishwashers and funnel/hub drains will have to be connected to a grease interceptor (as they are grease-bearing fixtures). However, to help reduce the burden of retrofits, the dishwasher requirement will only apply to new builds and spaces newly converted to support food service.</li> <li>• Hand sinks can be connected to a grease interceptor, but it is not a requirement. This change is being made based on feedback from industry, as many food sector establishments have hand sinks connected to grease interceptors, which is not necessary, but generally harmless. Removing the requirement that they must not be connected to the grease interceptor helps reduce the burden of extensive retrofits.</li> </ul>
<b>Sizing</b>	<p><b>What we heard:</b> Grease interceptor sizing requirements are challenging for small locations. Space is at a premium and it can be difficult to install interceptors to current standards in smaller businesses.</p> <p><b>Response:</b> Metro Vancouver reviewed and revised the <b>Grease Interceptor Selection Methodology</b> for grease interceptors in 2021. It uses 75 per cent of sink volume (instead of the previous 100 per cent) for determining the sizing of grease interceptors. As a result, smaller grease interceptors will generally be required.</p>

INTEREST AREA	WHAT WE HEARD AND HOW WE'VE RESPONDED
<b>Food grinders and digesters</b>	<p><b>What we heard:</b></p> <p>Questions about the regulation of food waste disposal units such as food grinders and digesters.</p> <p><b>Response:</b></p> <p>Food grinders are already regulated by the bylaw and are allowed — provided they are connected to a solids interceptor and then a grease interceptor. At this time, changes to how digesters and grinders are regulated under the bylaw are not being considered; however, Metro Vancouver is planning to collect more information to develop regulatory options for digester and grinder technologies in the future.</p>
<b>Markets and commissary kitchens</b>	<p><b>What we heard:</b></p> <p>Overall support for adding markets and commissary kitchens (a commercial kitchen rented by local food service operators, such as caterers and bakers) to the bylaw. Overall support for ensuring all food sector establishments are treated the same.</p> <p><b>Response:</b></p> <p>One of the proposed bylaw changes updates the definition of a food sector establishment to include markets and commissary kitchens. These are not explicitly listed in the current bylaw and this change would ensure that these emerging sectors are regulated alongside traditional restaurants to help protect the environment and the regional sewer system from fats, oils, and grease coming from these locations.</p>
<b>Increasing regulation</b>	<p><b>What we heard:</b></p> <p>Concern about increasing regulation, potentially resulting in unnecessary bureaucracy and red-tape for business-owners.</p> <p><b>Response:</b></p> <p>In large part, the bylaw changes are intended to reduce unnecessary regulation, by removing certain restrictions and requirements, thereby giving the food sector industry more flexibility to comply with the bylaw. For example, one of the changes removes the requirement for floor drains and mop sinks to be connected to a grease interceptor, as they generally pose a lower risk for sewer blockages. Removing this requirement helps reduce the burden of extensive retrofits since sub-floor construction may require additional structural and seismic considerations.</p>
<b>Fines and compliance</b>	<p><b>What we heard:</b></p> <p>The incentive to comply with the bylaw is low as inspection resources are limited, and fines are nominal and rare, particularly in comparison with the cost of renovations. Suggestion to provide a financial incentive program to encourage compliance, such as rebates for completing grease interceptor upgrades.</p> <p><b>Response:</b></p> <p>Metro Vancouver works first to encourage compliance through education and working with business owners. If there are instances of repeated non-compliance, Metro Vancouver has several tools to respond. Metro Vancouver recently obtained authority to levy financial penalties for non-compliance and is in the process of drafting new policies for this enforcement tool. Repeated non-compliance of the bylaw can result in prosecution.</p> <p>Financial incentives to improve compliance are not being considered, as having a properly-sized grease interceptor is a regulatory requirement to protect the sewer system and the environment.</p>

INTEREST AREA	WHAT WE HEARD AND HOW WE'VE RESPONDED
<p><b>Preferred hauler program</b></p>	<p><b>What we heard:</b></p> <p>A preferred hauler program was suggested, where approved grease interceptor maintenance providers could electronically submit confirmation that an establishment's grease interceptor is in compliance and being maintained.</p> <p><b>Response:</b></p> <p>While this suggestion is not being pursued as part of this bylaw update, Metro Vancouver may look at developing a voluntary hauler program or other initiatives in the future.</p>
<p><b>Efficacy of grease interceptor in high temperature dishwashers</b></p>	<p><b>What we heard:</b></p> <p>Questions about the new requirement to connect dishwashers (in new builds and spaces newly converted to food service only) and whether the high temperature of a dishwasher's wash and rinse water will liquefy grease, causing it to bypass the grease interceptor, and render the interceptor ineffective.</p> <p><b>Response:</b></p> <p>The high temperature of dishwashers may impact the efficacy of the grease interceptor to trap the grease coming from the dishwasher. However, as dishwashers are a source of grease, it is necessary to have them connected to a grease interceptor to trap as much grease as possible. To reduce the burden of extensive retrofits, this new requirement only applies to new builds and spaces newly converted to food service.</p>
<p><b>Location of grease interceptor</b></p>	<p><b>What we heard:</b></p> <p>Suggestion that grease interceptors be allowed to be installed outdoors. Suggestion that the best place to install a grease interceptor is by the sink in the kitchen, and concern that in some cases, grease interceptors are installed in hard to service areas of buildings, such as the basement or underground parking.</p> <p><b>Response:</b></p> <p>The bylaw allows for interceptors to be installed outside; this will not change.</p> <p>For installation of grease interceptors in harder to access areas of buildings, the proposed bylaw change that will remove the requirement to connect grease interceptors to mop sinks and floor drains should reduce the number of grease interceptors installed underground.</p>
<p><b>Maintenance requirements</b></p>	<p><b>What we heard:</b></p> <p>Request that Metro Vancouver reconsider the bylaw requirement that grease interceptors be cleaned every three months.</p> <p><b>Response:</b></p> <p>During a previous bylaw review, Metro Vancouver staff considered grease interceptor sizing based on how much grease a business generated; however, this would be difficult to assess accurately, and poses challenges for effective monitoring and enforcement, as food sector establishments experience high turnover, and grease production could change. For this reason, the three month cleaning requirement remains.</p>



## How Feedback Was Used

Informed by this feedback and other policy requirements, Metro Vancouver staff developed the proposed bylaw amendments considered by Metro Vancouver's Liquid Waste Committee and Board for approval in fall 2023.



