

No.	Date	Source/Material	Organization/Group	Sector/Audience	Plan Section	Feedback/Comment	Metro Vancouver Response
1	24-Mar-26	Letter	Zero Waste BC	Nonprofit organization	Risk Analysis	We are writing to you because we are very concerned that the new solid waste management plan may be approved without decision-makers having a clear idea of the financial consequences or risks of approving such a plan. To date there have been piecemeal approvals of items like district energy and electricity sales contracts that collectively will make it harder for decision-makers to then shut down the facility once the actual costs are known. It is important that all of the facts and financial consequences are known before key decisions are made to avoid a repeat of the issues surrounding the liquid waste management system.	Affordability is a guiding principle and will be considered in all aspects of plan implementation. Metro Vancouver heard concerns across all sectors about the affordability. The Solid Waste Management Plan looks to leverage existing budget and collaboration to continue to be a leader in waste prevention. In addition, the draft plan was updated to extend financial projections over the 10-year expected plan duration; provide comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal; and include estimated allocation of approved budget associated with each strategy.
2	24-Mar-26	Letter	Zero Waste BC	Nonprofit organization	General	Here is the link to the updated Zero Waste Hierarchy which should be followed when developing waste solutions.	Similar feedback requesting adoption of the Zero Waste Hierarchy was received during the draft plan engagement phase. The following response was provided: The Zero Waste Hierarchy was not adopted as it considers Waste-to-Energy unacceptable. The plan's waste hierarchy prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.
3	24-Mar-26	Letter	Zero Waste BC	Nonprofit organization	Financial Overview	In the absence of a robust analysis for residual waste disposal options as part of the solid waste management planning process, we have been doing our own analysis with the publicly available information, however staff have shown different accounting for disposal costs. Despite repeated requests for more information, none was forthcoming leading us to file a request under the Freedom of Information and Protection of Privacy Act (FOIPPA). We also requested information on dioxins including the October 2025 dioxin testing of a rooftop nearby the incinerator, lifespan and maintenance needs of the incinerator, correspondence with the Province regarding waste planning and the incinerator, radioactive materials in waste, waste costs per tonne, climate pollution and waste planning but were told that this would cost over \$170,000 to provide. A scaled back request did reveal the spreadsheet numbers used by Metro Vancouver staff to determine the disposal costs (Zero Waste Committee meeting Sept 11, 2025). The request also highlighted that the reports on maintenance assessment for the incinerator and the October 2025 dioxin rooftop testing results had yet to be received.	The draft Solid Waste Management Plan was revised to add a comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal. Metro Vancouver's Waste-to-Energy facility is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, with most parameters less than 10% of limits. Results of rooftop monitoring have since been published and indicate that the particulates accumulating on the warehouse roof are not the result of deposition from the Waste-to-Energy Facility, and metal, dioxin and furan concentrations on the warehouse roof, other nearby roofs, in roadside dust and in soils near the Waste-to-Energy Facility are not significantly impacted by emissions from the Waste-to-Energy Facility.
4	24-Mar-26	Letter	Zero Waste BC	Nonprofit organization	Financial Overview	ZeroWasteBCs letter provided a detailed analysis of the cost spreadsheet used by Metro Vancouver to estimate per tonne disposal costs for disposal options, including specific concerns with how costs are calculated and communicated.	The draft Solid Waste Management Plan was revised to add a comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal. Waste-to-Energy facility is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, with most parameters less than 10% of limits. The overall cost analysis for disposal options includes costs related to handling garbage at recycling and waste centres proportionally based on the portion of the waste managed at the disposal facility that is initially delivered to a recycling and waste centre. Approximately 60% of the garbage disposed at the Waste-to-Energy Facility is delivered directly to the facility.
5	24-Mar-26	Letter	Zero Waste BC	Nonprofit organization	General	Recommendations: 1. Accountability -Include solid waste management in the public enquiry started to examine the management of liquid waste.	Accountability is a guiding principle of the draft solid waste management plan. Updated information on the independent review of the North Shore Wastewater Treatment Plant Project can be found on Metro Vancouver's website: https://metrovancouver.org/services/liquid-waste/north-shore-wastewater-treatment-plant-program-independent-review
6	24-Mar-26	Letter	Zero Waste BC	Nonprofit organization	Financial Overview	2. Financial transparency -Require budgets to be more accurate and specific. Require actual cost data to be included for the three years prior in the Five Year Financial Plans in order to understand trends and changes in accounting practices.	The draft plan was updated to extend financial projections over the 10-year expected plan duration; provide comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal; and include estimated allocation of approved budget associated with each strategy
7	24-Mar-26	Letter	Zero Waste BC	Nonprofit organization	Residual Management Strategic Approach	3. Informed Decision-making -Require an independent analysis of residual disposal options including accurate costing for previous years and estimates of costs over the time frame of the next solid waste management plan before the plan is approved.	The draft plan was updated to provide enhanced information provided about assessment of residual waste management options, including the use of the study in the development of disposal actions, and the engagement with advisory committees during study development and upon completion. Waste-to-Energy facility is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. The overall cost analysis for disposal options includes costs related to handling garbage at recycling and waste centres proportionally based on the portion of the waste managed at the disposal facility that is initially delivered to a recycling and waste centre. Approximately 60% of the garbage disposed at the Waste-to-Energy Facility is delivered directly to the facility.
8	24-Mar-26	Letter	Zero Waste BC	Nonprofit organization	General	4. Protect the community and environment -Require a report on the source of the dioxins on the rooftop near the incinerator and a plan for the next steps which must include more comprehensive testing of stack emissions, soil, water and sediments to ensure the facility is not polluting the surrounding area and incurring risk and possible costs for Metro Vancouver. This is basic due diligence.	Results of rooftop monitoring have since been published and indicate that the particulates accumulating on the warehouse roof are not the result of deposition from the Waste-to-Energy Facility, and metal, dioxin and furan concentrations on the warehouse roof, other nearby roofs, in roadside dust and in soils near the Waste-to-Energy Facility are not significantly impacted by emissions from the Waste-to-Energy Facility.
9	24-Mar-26	Letter	Zero Waste BC	Nonprofit organization	General	5. Transparency to partners- Develop a system to ensure key interest holders are kept informed. This must include decision makers of the Zero Waste Committee, Board and municipal councils; First Nations; local Health Authorities; the Province; the public and others. The results from implementing the recommendations above should be made public as soon as the results are available. This is also important to the 385 people and organizations that signed our petition asking Metro Vancouver to shut down the incinerator.	Transparency is a guiding principle of the draft solid waste management plan. Metro Vancouver will continue to keep interested parties informed throughout plan implementation.
10	02-Apr-26	ZWC delegation	Wastech Services Inc.	Waste and Recycling Industry	Residual Management Strategic Approach	As drafted, the Plan provides assumptions, generic studies, and future technical criteria for decisions but not explicit diversion/disposal options with costs — effectively a "plan to plan" the most consequential elements.	The draft plan was updated to included estimated costs associated with each strategy. Metro Vancouver's solid waste budget is approved by the GVS&DD on an annual basis as part of the overall GVS&DD budget. A five-year financial plan is endorsed by the GVS&DD Board at the time the budget is approved. Actions in the solid waste management 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 targets. Annual reporting on progress to achieve the targets of the Solid Waste Management Plan will assist in prioritizing funding and informing where investments are most appropriately allocated.
11	02-Apr-26	ZWC delegation	Wastech Services Inc.	Waste and Recycling Industry	Glossary	1) Definition of Diversion & Waste Combustion Classifying any waste-derived fuel that offsets fossil fuels as "diversion" pre-judges' outcomes without comparing the embodied-carbon and energy savings from reuse and recycling.	Similar feedback requesting adoption of the Zero Waste Hierarchy was received during the draft plan engagement phase. The following response was provided: The plan's waste hierarchy prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.
12	02-Apr-26	ZWC delegation	Wastech Services Inc.	Waste and Recycling Industry	Recover Strategy/Action	2) EPR Expansion & Calorific Value As EPR adds soft plastics, non-residential packaging, furniture, carpet, and textiles, many energy-dense materials leave the residual stream, reducing calorific value and eroding the economics for waste combustion.	The plan's waste hierarchy prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.
13	02-Apr-26	ZWC delegation	Wastech Services Inc.	Waste and Recycling Industry	Residual Management Strategic Approach	3) Option Comparisons Assigning transfer-station system costs to disposal options misstates the comparisons. Transfer stations are sunk, system-wide services established under the 1985/1995 SWMPs and are required regardless of disposal options.	This comment refers to disposal cost comparisons, which have been responded to during the idea generation and draft plan engagement process. Landfill and waste-to-energy disposal are roughly half the cost of remote landfilling.
14	02-Apr-26	ZWC delegation	Wastech Services Inc.	Waste and Recycling Industry	Residual Management Strategic Approach	4) Economies of Scale Scale reduces unit costs. The plan makes no mention of this when comparing disposal options. With corrected analysis for sunk costs and economies of scale, WTE and contingency landfill are likely within ~20% on unit cost—and with the forecasted capital program, WTE may equal or exceed landfill costs.	This comment refers to disposal cost comparisons, which have been responded to during the idea generation and draft plan engagement process. Landfill and waste-to-energy disposal are roughly half the cost of remote landfilling.

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15	20-Apr-26	Letter	HSR Zero Waste	Waste and Recycling Industry	Circular Economy	The engagement summaries reflect consistent feedback emphasizing the need for increased transparency, stronger regulatory tools, and a shift toward upstream waste reduction, reuse, and circular systems. However, based on a review of the revised draft plan and supporting materials, it is not evident that this feedback has been reflected in substantive policy or investment shifts.	The draft solid waste management plan emphasizes transparency and focuses on a shift toward upstream waste reduction, reuse, and circular systems. Regulatory priorities are provided in the regulatory strategic approach. Any proposed new regulatory measures will be accompanied by a transparent and meaningful engagement process. Engagement will follow Metro Vancouver's Public Engagement Board Policy and Public Engagement Guide. Metro Vancouver will also comply with any provincial requirements related to public consultation.
16	20-Apr-26	Letter	HSR Zero Waste	Waste and Recycling Industry	Reduce Strategy/Action	The plan continues to rely on existing residual waste management approaches, with limited evidence of regulatory mechanisms or policy changes that would drive meaningful upstream reduction or system transformation.	Key focus areas of the draft solid waste management plan include leading the transition to a regional circular economy through waste prevention focusing on enabling a circular regional economy prioritizing waste prevention.
17	20-Apr-26	Letter	HSR Zero Waste	Waste and Recycling Industry	Dispose Strategy/Action	In particular, the continued inclusion of waste-to-energy incineration appears to be maintained as an assumed component of the system, rather than one that has been clearly substantiated. Engagement feedback identified the need for transparency regarding lifecycle costs, emissions, and long-term necessity, which is not clearly demonstrated in the draft plan materials.	A recent public health risk assessment completed in consultation with health authorities concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Metro Vancouver's Waste-to-Energy facility is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfiling, and half of remote landfiling. The draft plan was revised to add a comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. Emissions were on average 15% of regulatory limits in 2025.
18	20-Apr-26	Letter	HSR Zero Waste	Waste and Recycling Industry	Glossary	Further clarification is required regarding how recycling, diversion, and recovery are defined and measured within the plan. The Zero Waste Hierarchy distinguishes between: - Recycling, where materials are mechanically recovered and returned to continuous material cycles - Material recovery, where recyclable materials are separated and recovered after disposal through mechanical processes - Recovery pathways, where materials are converted into fuel or other by-products, resulting in their destruction or removal from material circulation As outlined in prior correspondence, while post-disposal material recovery may support recycling outcomes, it does not represent diversion from disposal. Similarly, recovery pathways that convert materials into fuel or energy represent a form of final disposal and should not be represented as diversion. To ensure transparency and alignment with Zero Waste principles, these distinctions should be clearly defined and consistently reflected in performance metrics. Without this clarity, reported diversion outcomes may not accurately reflect progress toward waste reduction and circularity.	Similar feedback requesting adoption of the Zero Waste Hierarchy was received during the draft plan engagement phase. The following response was provided: The Zero Waste Hierarchy was not adopted as it considers Waste-to-Energy unacceptable. The plan's waste hierarchy prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.
19	20-Apr-26	Letter	HSR Zero Waste	Waste and Recycling Industry	General	Given the consistency of feedback received, we recommend that Metro Vancouver: Demonstrate how engagement input has materially influenced policy direction and investment priorities	Following each phase of engagement, an engagement summary report was published summarizing key engagement themes and responses. Reports to Zero Waste Committee and the GVS&DD Board at each phase of the plan update indicated how engagement feedback influenced development of the draft solid waste management plan. This information will be submitted to the province along with the draft solid waste management plan.
20	20-Apr-26	Letter	HSR Zero Waste	Waste and Recycling Industry	Regulatory Strategic Approach	Given the consistency of feedback received, we recommend that Metro Vancouver: Provide transparent, comparative analysis of residual waste management options, including lifecycle environmental and financial considerations, clearly demonstrating whether waste-to-energy is necessary within the system under projected waste reduction scenarios	Similar feedback on demonstrating cost effectiveness of the waste-to-energy facility was received during the draft plan engagement phase. Metro Vancouver's response noted the information in the residual management strategic approach of the draft solid waste management plan, and that the Waste-to-Energy facility continues to be a safe and cost-effective method for managing residual garbage, alongside other options.
21	20-Apr-26	Letter	HSR Zero Waste	Waste and Recycling Industry	Glossary	Given the consistency of feedback received, we recommend that Metro Vancouver: Clearly define recycling, diversion, and recovery metrics in alignment with the Zero Waste Hierarchy	Definitions are based on federal, provincial or industry standards, where they exist. Similar feedback requesting adoption of the Zero Waste Hierarchy was received during the draft plan engagement phase. The following response was provided: The Zero Waste Hierarchy was not adopted as it considers Waste-to-Energy unacceptable. The plan's waste hierarchy prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort. Transparent cost information has already been shared.
22	20-Apr-26	Letter	HSR Zero Waste	Waste and Recycling Industry	Circular Economy	Given the consistency of feedback received, we recommend that Metro Vancouver: Strengthen regulatory and policy mechanisms to support upstream waste reduction, reuse, and circular outcomes	Similar feedback on strengthening regulation and policy mechanisms was received during the draft plan engagement phase. Metro Vancouver's response noted that the addition of key focus areas to the draft plan highlighted mechanisms to support waste reduction, that regulatory priorities are highlighted in the executive summary of the plan, and that language was strengthened throughout the plan.
23	04-May-26	Meeting	Building Owners & Managers Association BC	Commercial buildings	Recycle Strategy/Action	Increased focus on commercial organics participation and performance having cost implications for commercial properties - Hard to read direct implications for MV to regulate and what BOMA's position and abilities are when reading the draft plan. - Concerns on new requirements – added cost can be punitive on buildings, lots of buildings are older or could impact smaller buildings and be very costly for tenants - Newest highest performing buildings set up for waste diversion – doing well but large sector of smaller older buildings struggling to meet the requirements and have more costs related to them	Metro Vancouver will continue to work with interested parties, including BOMA, to ensure that affordability, a guiding principle in the draft solid waste management plan, is a continued consideration during implementation.
24	04-May-26	Meeting	Building Owners & Managers Association BC	Commercial buildings	Education and Outreach	More so about continued engagement on the plan implementation that affect building owners - like how to work with BOMA on education and data tracking together for the tenants and building owners – collaboration on education for landlords and tenants	Actions 2.1.4 and 2.1.5 looks to support reduction of waste from businesses with practical tools and education that is co-developed with industry associations such as BOMA. The objective is to gain industry buy-in and make sure the actions implemented in the plan work for commercial landlords. They also look to create space for industry to share waste reduction solutions that work.
25	04-May-26	Meeting	Building Owners & Managers Association BC	Commercial buildings	Regulatory Strategic Approach	Wants to know more about right sizing the regulations and goals of MV with measuring the admin and financial costs of waste diversion throughout the buildings – that cost eventually goes onto tenants	Any regulation brought in by Metro Vancouver or member jurisdictions to support waste reduction will include engagement with impacted stakeholders.
26	04-May-26	Meeting	Building Owners & Managers Association BC	Commercial buildings	Regulatory Strategic Approach	Wants to know the way the regulations could affect the building owners, and how they could look different – municipal implementation versus regional government regulations	Any regulation brought in by Metro Vancouver or member jurisdictions to support waste reduction will include engagement with impacted stakeholders. The updated plan was also revised to add more clarity in the Regulatory Strategic Approach section to describe conditions and the process/engagement for consideration of potential future regulations, as well as specifying the approvals required (e.g. several would require provincial approval to be implemented).
27	04-May-26	Meeting	Building Owners & Managers Association BC	Commercial buildings	Regulatory Strategic Approach	Where are the ways for the smaller and older buildings to tweak the regulations for it not to be very costly on them?	Any regulation brought in by Metro Vancouver or member jurisdictions to support waste reduction will include engagement with impacted stakeholders. Bylaws will consider if it makes sense to apply to both existing commercial spaces and/or only new builds to account for the real challenges. The draft plan was revised to add more clarity in the Regulatory Strategic Approach section to describe conditions and the process/engagement for consideration of potential future regulations, as well as specifying the approvals required (e.g. several would require provincial approval to be implemented)
28	04-May-26	Meeting	Building Owners & Managers Association BC	Commercial buildings	Regulatory Strategic Approach	BOMA has a lot of members with different commercial assets in different municipalities o the differences in impacts in every municipality is related to real estate owners being burdened with the administration of their buildings for the implementations of the different municipalities bylaws	As part of the updated plan, the region is looking to act as a convener to support the harmonization of municipal bylaws

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29	04-May-26	Meeting	Building Owners & Managers Association BC	Commercial buildings	Regulatory Strategic Approach	- Increased focus on commercial organics participation and performance - Organics disposal ban - are there plans to increase enforcement?	The draft plan was revised to add clarity in the Regulatory Strategic Approach section to describe conditions and the process/engagement for consideration of potential future regulations, as well as specifying the approvals required (e.g. several would require provincial approval to be implemented). Any regulation introduced by Metro Vancouver or its member jurisdictions to support waste reduction would involve engagement with affected stakeholders throughout the development process. During consultation, many stakeholders also encouraged Metro Vancouver to explore mandatory source separation as a potential tool to improve waste diversion. Mandatory source separation is one of several approaches that Metro Vancouver may consider to increase access to organics and recycling services in multi-family residential buildings, businesses, and institutions, while supporting broader waste reduction objectives.
30	04-May-26	Meeting	Building Owners & Managers Association BC	Commercial buildings	Education and Outreach	building owner to engage with residents on what goes out of the building – has very little control over what the tenants are doing for their organic and waste diversion efforts Building owner – gets in the middle of it – because haulers pass on the charges to the tenants – not cost effective currently	Actions 2.1.4 and 2.1.5 looks to support reduction of waste from businesses with practical tools and education that is co-developed with industry associations such as BOMA. The objective is to gain industry buy-in and make sure the actions implemented in the plan work for commercial landlords. They also look to create space for industry to share waste reduction solutions that work. Working with BOMA on what they have tried and looking to try new pilot new interventions to support this challenge with landlords. Metro Vancouver is looking to support landlords with this challenge as part of the updated education and outreach in the updated plan.
31	04-May-26	Meeting	Building Owners & Managers Association BC	Commercial buildings	Regulatory Strategic Approach	when submit plan to province – encourage some sort of model to include different interested parties – the province could play a role to encourage municipalities trying to keep it most consistent as possible for implementation	The draft Solid Waste Management Plan being prepared for Zero Waste Committee and GVS&DD Board consideration, followed by submission to the Minister of Environment and Parks, includes principles, strategies, and actions to help the region move towards increased consistency. It also identifies the role of Provincial legislation, such as the <i>Single-use and Plastic Waste Prevention Regulation</i> , in creating consistency across the province, and Metro Vancouver will continue to work with the provincial government to help explore similar initiatives.
32	04-May-26	Meeting	Building Owners & Managers Association BC	Commercial buildings	Targets/Metrics	- Expanded data collection, tracking, and reporting expectations - Anything extra to track by tenants and owners is tricky as it increases time and effort and there are potential cost implications - When read through the plan – a lot of emphasis was on tracking and reporting – which is MV role, not the system users or building owners - MV to improve waste com study to get better data and have a more focused approach	Metro Vancouver already collects commercial waste composition data. This program supports industry to better understand their waste. Through Strategies 1.4, 2.1 and 4.6 Metro Vancouver is looking to connect waste reduction education and outreach efforts with data collection to better measure which efforts are most impactful. Metro Vancouver is committed to working collaboratively with associations such as BOMA to share data, evaluate outcomes, and identify effective approaches and best practices.
33	04-May-26	Meeting	Building Owners & Managers Association BC	Commercial buildings	Targets/Metrics	Could help in developing waste reduction guidelines for members – look into option of sharing aggregated data with MV to be able to improve MV results of the region Open to sharing data with government – to make better policy decisions Make sure the data is voluntarily being shared but not obligatory in the plan update	Metro Vancouver is committed to working collaboratively with associations such as BOMA to share data, evaluate outcomes, and identify effective approaches and best practices.
34	08-May-26	Letter	Building Owners & Managers Association BC	Commercial buildings	General	BOMA BC supports Metro Vancouver's objectives to reduce landfill disposal, increase recycling, and improve organics diversion across the region. However, there are opportunities for collaboration between the commercial real estate industry and Metro Vancouver to ensure program success, and to minimize financial burden on industry.	Thank you for your support. Similar concerns were expressed by other industry groups throughout the plan consultation phases and were taken into consideration during the development of the updated plan. Implementation of the plan's actions will occur in collaboration with industry stakeholders to minimize impacts and support practical, effective outcomes.
35	08-May-26	Letter	Building Owners & Managers Association BC	Commercial buildings	Reduce Strategy/Action	BOMA BEST-certified buildings incorporate waste auditing, diversion tracking, and continuous improvement practices, demonstrating our industry's leadership, and the proactive and voluntary approach to addressing this issue. For example, 36% of BOMA BEST office buildings obtain capture rates of 80-100%.	Metro Vancouver is committed to working collaboratively with associations such as BOMA to share data, evaluate outcomes, and identify effective approaches and best practices.
36	08-May-26	Letter	Building Owners & Managers Association BC	Commercial buildings	Member Actions	While the Plan does not directly regulate individual buildings, implementation through municipal bylaws, disposal enforcement, and hauler practices would effectively transmit new requirements to property owners. This may require renovations or new operational costs and burdens which are ultimately borne by small businesses and tenants. In precarious economic times, we should use education, awareness, and industry programs to improve waste practices, rather than added costs. BOMA BC encourages Metro Vancouver to ensure any implementation remains phased and flexible, with recognition of the physical and operational constraints of existing buildings.	Similar concerns were expressed by other industry groups throughout the plan consultation phases and were taken into consideration during the development of the updated plan. As part of the updated plan, the region will serve as a convener, bringing municipalities together to support the harmonization of bylaws and encourage a more coordinated approach to regulation.
37	08-May-26	Letter	Building Owners & Managers Association BC	Commercial buildings	Member Actions	This plan provides the vision for 21 individual municipalities to implement individually through its own plans and bylaws, potentially creating a patchwork of regulations. This makes compliance an administrative burden for building owners operating in multiple jurisdictions. Industry needs a consistent approach, and we encourage Metro Vancouver to ask the province to adopt a standardized approach to implementation.	Similar concerns were expressed by other industry groups throughout the plan consultation phases and were taken into consideration during the development of the updated plan. As part of the updated plan, the region will serve as a convener, bringing municipalities together to support the harmonization of bylaws and encourage a more coordinated approach to regulation.
38	08-May-26	Letter	Building Owners & Managers Association BC	Commercial buildings	Regulatory Strategic Approach	Increasing penalties on haulers to incent better behavior has inherent challenges. Building owners and property managers can't control how tenants dispose of their waste, and penalizing haulers for improper tenant disposal practices only ends up adding costs and burdens on building owners and managers. Additionally, new municipal bylaws around waste diversion may require new building infrastructure, reconfiguration of waste rooms or loading areas, additional administrative oversight, and higher hauling costs associated with contamination or rejected loads.	Similar concerns were expressed by other industry groups throughout the plan consultation phases and were taken into consideration during the development of the updated plan. As part of the updated plan, the region will serve as a convener, bringing municipalities together to support the harmonization of bylaws and encourage a more coordinated approach to regulation. Similar concerns regarding hauler impacts were raised by members of Metro Vancouver's Industry Advisory Committee. In response, Metro Vancouver is exploring a hauler incentive program and identifying ways to better support building occupants in properly sorting their waste. These efforts are intended to improve diversion outcomes and help reduce contamination-related surcharges for haulers.
39	08-May-26	Letter	Building Owners & Managers Association BC	Commercial buildings	Recycle Strategy/Action	The commercial real estate industry supports waste diversion through recycling, organics programs, tenant engagement, and BOMA BEST benchmarking. Enhanced data sharing with Metro Vancouver would improve transparency and provide consistent insight into sector performance, helping to inform more flexible, outcomes-based policy approaches as an alternative to prescriptive regulation.	Metro Vancouver is committed to working collaboratively with associations such as BOMA to share data, evaluate outcomes, and identify effective approaches and best practices.
40	08-May-26	Letter	Building Owners & Managers Association BC	Commercial buildings	Reduce Strategy/Action	We believe the solution to better waste diversion is education and awareness. Clear guidance from building owners and property managers on best practices will help tenants make better decisions, and BOMA BC is uniquely positioned to share information, convene stakeholders, and encourage proper disposal methods. We encourage Metro Vancouver to consider this tactic to increase diversion.	In Strategy 2.1, Metro Vancouver seeks to work collaboratively with member municipalities and industry stakeholders to develop, test, and share approaches that further reduce commercial and institutional waste. This includes partnering with businesses to co-develop education and outreach tools that support effective waste reduction and recycling practices. Strategy 4.6 also looks to provide specific recycling education and outreach for business.
41	24-Apr-26	ZWC delegation	Restaurants Canada	Food service	Regulatory Strategic Approach	Fragmented policy environment Unrealistic operating environment for restaurants to manage different reporting obligations, costs Unrealistic expectations on consumers to change behaviours	Similar concerns were expressed by other industry groups throughout the plan consultation phases and were taken into consideration during the development of the updated plan. As part of the updated plan, the region will serve as a convener, bringing municipalities together to support the harmonization of bylaws and encourage a more coordinated approach to regulation. Similar concerns regarding hauler impacts were raised by members of Metro Vancouver's Industry Advisory Committee. In response, Metro Vancouver is actively exploring a hauler incentive program and identifying ways to better support building occupants in properly sorting their waste. These efforts are intended to improve diversion outcomes and help reduce contamination-related surcharges for haulers.
42	24-Apr-26	ZWC delegation	Restaurants Canada	Food service	Targets/Metrics	Evidence-based targets Increased diversion targets in the plan are based on current diversion levels Concerns with committing to targets without implementation details on how businesses can realistically achieve these targets	The draft plan was revised to add a new table identifying how elements of the plan contribute to achieving proposed targets by reducing material generation in specific categories, based on existing waste composition information and the strategies and actions in the plan. Ambitious targets in the updated plan reflect feedback from many stakeholders who emphasized the importance of continuing to reduce waste across all sectors. The plan includes several actions designed to support businesses in achieving these targets through collaboration, knowledge sharing, and innovation. In particular, Actions 2.1.4 and 2.1.5 focus on co-developing practical tools, resources, and support with businesses to help reduce waste effectively. Experience from other jurisdictions and industry experts has shown that improving operational efficiencies can not only reduce waste generation but also lower costs and create additional business value.
43	24-Apr-26	ZWC delegation	Restaurants Canada	Food service		Implications for restaurants related to reusable food service ware requirements and changes to organic food waste management. Further details including definitions and implementation are necessary to account for the operational realities of restaurants, and the varied nature of restaurants. Challenges with reusable food service in various operating realities, global supply chains.	The draft plan emphasizes working with businesses to reduce waste, referencing co-development of education tools and waste reduction tools and support for businesses. Strategy 2.1 is "Collaborate with businesses and institutions to reduce waste at the source." and includes actions such as Action 2.1.3a "Co-develop education tools with business leaders and associations to help businesses reduce waste, motivate customers to participate, and comply with evolving waste reduction regulations." and Action 2.1.5 "Host forums with large generators of waste to co-develop and implement waste reduction solutions." Action 2.3.1 is to "Work with businesses, industry associations, and non-profits to reduce food loss and waste..." and Action 3.4.2 is to "Seek approval to establish a business funding program to support the transition to reuse, refill, repair." Implementation of these collaborative actions will consider the operational realities of different business types and the challenges they face.

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44	24-Apr-26	ZWC delegation	Restaurants Canada	Food service	Reuse Strategy/Action	Reusable food service ware requirements Strategy 3.1.1. calls for advocating for the phase in of reusable food service ware requirements for non-residential sectors. Advancing reusable dishware across Metro Vancouver would create a patchwork of municipal requirements that increases both operational complexity and costs for small businesses. Such mandates require significant upfront investments (e.g. dishwashers, plumbing modifications, dishware procurement, and replacement costs due to loss or breakage). Restaurants operate under diverse business models, sizes, and service types, meaning a one-size-fits-all mandate does not reflect operational realities. In some restaurant formats, reuse is simply not logistically feasible, particularly where equipment investments have been made to utilize existing packaging that is provided through a global or national supply chain. Restaurants Canada recommends that the solid waste management plan remove its advocacy for scaling up reusable dishware for dine-in service and instead work collaboratively with industry to identify alternative, practical waste-reduction solutions.	The draft plan was revised: Updated the secondary metrics under Reduce to include measurement of percent of the region with programs in place for reusables, instead of percentage of the region covered by reusable regulations for dine-in. "Strategy 3.1 of the draft solid waste management plan, under which action 3.1.1 falls, is to support consistent approaches to reuse. The plan notes that "Consistent approaches to government reuse policies and programs can reduce confusion for residents, improve efficiency for businesses, and help enable widespread adoption. Metro Vancouver will play a convening role to develop, test, and share guidance to help align programs and policies across the region for reusable food serviceware...". Advocacy for phase in of reusable food serviceware will emphasize consistent approaches, looking to avoid a patchwork of municipal requirements, and would seek input from the businesses that would be impacted.
45	24-Apr-26	ZWC delegation	Restaurants Canada	Food service	Reduce Strategy/Action	Restaurants Canada supports efforts to reduce food loss and waste in the foodservice sector - we are already doing this in several ways (e.g. optimizing sourcing ingredients and partnering with food rescue organizations). However, the plan to pilot and scale food waste prevention initiatives does not target the largest sources of food waste. It does not account for the significant difference between back-of-house (prep) waste, and front-of-house (guest) waste. Restaurants' business models create built-in incentives to focus on food waste prevention in the areas they can control - during food preparation in back-of-house. We recommend the solid waste management plan considers the realities of food loss and waste in restaurants before advocating for new initiative that layer in operational complexity and potential new costs for restaurants.	The draft plan states that Metro Vancouver will "Pilot and scale up initiatives to support food waste prevention practices and share learnings with the hospitality and neterainment sectors, post-secondary institutions, healthcare facilities, large-scale catering operations, and food distributors." Before a specific pilot is launched, Metro Vancouver would seek input from relevant sectors to assess feasibility and potential impact.
46	24-Apr-26	ZWC delegation	Restaurants Canada	Food service	Reduce Strategy/Action	The plan proposes to advocate for improvements to the recyclability, or phase-out of multi-material products. – Currently face limited feasible alternatives or scalable recycling opportunities for certain multi-material products (E.g. coffee cups) – We support Metro Vancouver looking for improvements to the recyclability of multi-material products, including improved infrastructure to increase recycling opportunities for many single use items and ask to work with you and the broader waste management industry on this matter.	The draft plan states that Metro Vancouver will "Work to improve the recyclability of products and packaging and incorporate recycled content: a. Work with national plastics waste reduction organizations to understand barriers and advocate for increased recycled content in plastic products and packaging b. Research and advocate for improvements to the recyclability or phase out of multi-material products including coffee cups, and c. Enhance partnerships with the provincial government, industry, academia, and community groups to research, develop and share solutions." Part a of this action involves working with the organizations whose membership includes representatives from the broader waste management industry. Restaurants Canada would be considered an industry partner to enhance partnerships with in the research, development, and sharing of solutions contemplated in this action, as per part c.
47	23-Apr-26	Email	Restaurants Canada	Food service	Reduce Strategy/Action	While our ask is to reconsider the inclusion of reusable server ware in the plan, among other concerns, we also appreciate the opportunity to continue this work with you moving forward to develop solutions that recognize the operational and economic realities of restaurants.	The draft plan was revised to update the secondary metrics under Reduce to include measurement of percent of the region with programs in place for reusables, instead of percentage of the region covered by reusable regulations for dine-in. *Metro Vancouver looks forward to working with Restaurants Canada on the development and implementation of the actions contemplated.
48	28-May-26	Meeting	Fraser Valley Regional District Board	Local government	Dispose Strategy/Action	You note your strategic principle for prioritizing local solutions because local solutions are "typically less expensive" – how/why/what is the criteria used	Transportation costs becoming more and more significant. Lots of examples of local solutions being less expensive from financial perspective. E.g. disposal costs - roughly half the cost to manage garbage locally compared to remote landfills. It's a consideration with respect to decisions on solid waste. Note the comparisons use market prices – based on contracts as a result of procurement processes.
49	28-May-26	Meeting	Fraser Valley Regional District Board	Local government	Dispose Strategy/Action	What is MV's plan for disposal capacity in 20 years? FVRD is considering long term disposal needs. Is MV open to partnering on a joint landfill project in the future?	In January 2026, Metro Vancouver, Vancouver, and Delta entered into an agreement with respect to the Vancouver Landfill that pushes its availability to as late as 2050. For the duration of this solid waste management plan, Metro Vancouver will have use of both the Vancouver Landfill and the Waste-to-Energy Facility, plus contingency disposal at remote landfills for any garbage that can't be disposed of in the local system. We would be happy to have a discussion with FVRD about the possibility of working together on future disposal capacity solutions
50	28-May-26	Meeting	Fraser Valley Regional District Board	Local government	Targets/Metrics	You noted a 13% reduction in waste generation. Any statistics on diversion in the commercial sector?	Metro Vancouver publishes statistics on waste diversion rate and does separate according to sectors including the commercial sector. Diversion rates for the commercial sector tend to be lower compared to other sectors so it is a focus area for the new solid waste management plan.
51	28-May-26	Meeting	Fraser Valley Regional District Board	Local government	Recycle Strategy/Action	One of your points was to make recycling easier. Many cities have gone to toters where people can just throw all waste in. How do you educate people on contamination and what is your current contamination rate.	Encouraging and communicating with the public is a collaborative effort between Metro Vancouver, member municipalities, and producer responsibility organizations (e.g. Recycle BC).
52	28-May-26	Meeting	Fraser Valley Regional District Board	Local government	Dispose Strategy/Action	Based on the age of the incinerator, do you have plans to phase out the use of the facility?	We have no plans to expand nor phase out the facility – we are maintaining it. The current operating contract is a 5 year contract with the opportunity to extend up to 15 years. We plan to continue upgrading and using the Waste-to-Energy Facility as an effective local solution for managing garbage.
53	28-May-26	Meeting	Fraser Valley Regional District Board	Local government	Dispose Strategy/Action	Your slide on emissions was focused on nitrogen and particulate matter. What other standards did you consider? How about metals?	The two examples shown were only examples of our comprehensive environmental reporting. All data is available publicly and we are happy to share links with FVRD staff. We monitor a full range of metals and other parameters at the stack and also in the ash.
54	28-May-26	Meeting	Fraser Valley Regional District Board	Local government	Dispose Strategy/Action	How were the regulatory standards created?	Metro Vancouver adheres to provincial regulatory standards. We do not create our own standards, but rather are mandated to follow provincial standards.
55	28-May-26	Meeting	Fraser Valley Regional District Board	Local government	Dispose Strategy/Action	What is the lifespan of the Waste-to-Energy Facility? Does it have a role beyond the time frame of this solid waste management plan?	The facility has undergone various upgrades over its life. There is no specific lifespan. Facilities in Europe are continuously upgraded and have operated for up to 100 years.
56	28-May-26	Meeting	Fraser Valley Regional District Board	Local government	Dispose Strategy/Action	With an impressive 65% diversion rate, as that success continues, there would be fewer organics and combustibles in the waste stream. Would MV continue to use innovative ways to increase diversion? What will happen if there are less combustibles in the waste? Have you considered a mixed materials processing facility?	We see change in composition of waste over time. Mass burn is quite flexible with respect to the material being managed – we have observed that as material changes, the facility continues being an effective way to manage waste. Mixed waste processing – we conducted a study as part of the plan update process, where we saw limited success with those types of facilities. We welcome FVRD to share with us if you know of or hear of a successful example .
57	28-May-26	Meeting	Fraser Valley Regional District Board	Local government	Dispose Strategy/Action	We understand the position MV is in. No one wants to see long distance hauling of garbage. But strongly encourage MV to think beyond the solid waste management plan and consider collaborative effort to manage waste on a larger scale than our two regions. Your data gives us some comfort, but we are seeing air pollution come at us from all directions (forest fires, waste-to-energy...). We understand the solid waste management problem, but don't want it to become an air quality problem as well. Disappointed waste-to-energy is still part of the plan. Hope we can find a long term solution.	Noted. Metro Vancouver is the regulator for air quality in our region. We continue to monitor air quality and are keenly aware of these concerns.

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58	28-May-26	Meeting	Fraser Valley Regional District Board	Local government	Dispose Strategy/Action	Can you clarify when the \$100M upgrade for acid gas reduction will be underway, and will they result in a significant reduction in SO2?	The operational certificate was updated in 2025 requiring Metro Vancouver to do a series of technical studies, modelling, and a public health risk assessment, with the goal of proposing updated emission limits for HCl, SO2, and other parameters. We will provide proposed limits in September, and following that there will be public engagement including with FVRD on those proposed limits.
59	28-May-26	Meeting	Fraser Valley Regional District Board	Local government	Residual Management Strategic Approach	Illegal dumping of construction waste on rural and agricultural lands is a big issue for FVRD. Assuming some is coming from the MV region. How is MV dealing with this issue?	We are happy to work with FVRD staff on opportunities to collaborate on illegal dumping solutions. Much of the responsibility for illegal dumping lies with our member jurisdictions, who struggle with this issue whether on rural land or urban areas/aneways. Costs are significant. Illegal dumping is also an issue for MV, especially industrial soils disposed on agricultural land, and construction debris on the side of the road. Pricing of our disposal is important to consider to help avoid illegal dumping.
60	28-May-26	Meeting	Fraser Valley Regional District Board	Local government	Dispose Strategy/Action	How much municipal solid waste enters the FVRD from Metro Vancouver?	Within MV we have excellent statistics with respect to waste generation and disposal. Approximately 50 licensed solid waste facilities report to Metro Vancouver's Environmental Regulation & Enforcement group. We have heard there is some movement of large trailers of demolition materials that go directly to facilities in the Fraser Valley, bypassing Metro Vancouver facilities or private facilities in our region. We don't have data on that. For garbage specifically, we are not aware of any movement from MV to FVRD at this time.
61	28-May-26	Meeting	Fraser Valley Regional District Board	Local government	Dispose Strategy/Action	Can you provide an update on the public health risk assessment that is currently being conducted, related to waste-to-energy emissions?	A public health risk assessment was completed in 2018. An updated health risk assessment is underway as part of the updated operational certificate requirements. When complete it will be publicly available and will be submitted to the Province along with the proposed emission limits.
62	28-May-26	Meeting	Fraser Valley Regional District Board	Local government	Dispose Strategy/Action	We are all concerned about air quality. If the Vancouver Landfill fills up by 2050 and long lead times are required to replace capacity, what decisions are being deferred today? Can neighbouring regional districts be sure that in future incineration does not become the default?	Metro Vancouver is not currently working on longer-term disposal options – it is outside the time frame of this solid waste management plan.
63	28-May-26	Meeting	Fraser Valley Regional District Board	Local government	Dispose Strategy/Action	Clarification about whether particulate matter shown on the chart is primary or secondary particulate matter.	The chart shows filterable particulates (dry particulates accumulating on a filter). We are also investigating condensable particulates as a potential new method of monitoring.
64	28-May-26	Meeting	Fraser Valley Regional District Board	Local government	Dispose Strategy/Action	SO2 is one of our main concerns due to health impacts. The provincial requirement is 50 mg/m3. They've allowed 200mg/m3 but on a temporary basis while you were upgrading the facility – that was 10 years ago and upgrades haven't happened. Right now you're at 70-75 mg/m3. Even 50 mg/m3 is generous as Ontario is at 35 mg/m3. I'm concerned the proposed updated emission limits will be greater than the current 50 mg/m3. We want to keep it as low as possible and complete the upgrades.	Working to reduce SO2 emissions from facility is priority. We're doing series of tests to change material we add to facility to push down SO2 and HCl emissions. This is key work before proposing emission limits to province in the fall.
65	02-Jun-26	Email	Public	Public members-at-large	General	But meanwhile you want to put an AI center all over B.C and Vancouver. Your plan is a farss.Green house gas? Stop b*g the tax payer	Greenhouse gas reductions are addressed through guiding principles, actions to reduction organics going to disposal, actions increase reuse and repair and new greenhouse gas reduction targets.
66	09-Jun-26	Email	SymbiAudit Inc.	Business	Reduce Strategy/Action	Nonetheless, I see that I missed some details regarding the compliance & inspection section. I really liked: - pursuing a 'clear bag' policy to improve inspection efficacy - simple and effective! - administrative monetary penalties to address non-compliance - the pain of business as usual must be greater than the cost of doing the right thing - incentives for innovation within licensed facilities - everyone prefers a carrot over a stick!	Thank you for your support
67	09-Jun-26	Email	SymbiAudit Inc.	Business	Dispose Strategy/Action	On another note, I dug up the reference I was alluding to about the (alleged) 30,000 - 50,000 tonnes of C & D waste. See the attached SWMP Feedback Summary (and highlighted text) from January of this year. Does this reference ring any bells for you? If it does, is clean wood part of that C & D waste?	Clean wood is a small portion of the C&D waste going to disposal in the region. Most of the wood is pressure treated, painted or manufactured wood.
68	15-Jun-26	Email	BetterTable	Business	Reduce Strategy/Action	I have reviewed the April 24, 2026 delegation submitted by Restaurants Canada to the GVS&DD Board. While I understand the concerns raised around operational complexity and costs, I would like to offer a different perspective for the Ministry's consideration: food waste prevention initiatives, when properly implemented, represent a genuine opportunity for cost reduction for restaurant operators - not an additional burden. Restaurants Canada's brief notes that "restaurants' business models create built-in incentives to focus on food waste prevention in the areas they can control." I agree wholeheartedly - and this is precisely the argument for scaling up food waste auditing tools. The disconnect today is not motivation; it is visibility. Most operators simply do not have the data to act on what they already know is a problem. If food waste were truly built into business models efficiently, it would not cost the Canadian foodservice sector an estimated \$14 billion per year - a figure that speaks for itself. Our work with properties across British Columbia - including Delta Hotels by Marriott, Oak Bay Beach Resort, and UBC Food Services - consistently shows that when restaurants gain granular, real-time insight into back-of-house prep waste, they are able to reduce food purchasing costs, optimize menu planning, and generate sustainability reporting without the burden of manual tracking. Restaurants Canada warns against "potential new costs for restaurants." We believe the opposite outcome is achievable. With the right technology support - hardware-free, accessible on any mobile device, and designed specifically for foodservice operations - food waste prevention initiatives piloted under the SWMP can deliver measurable cost savings to operators, particularly those facing the shrinking margins Restaurants Canada rightly highlights.	Metro Vancouver shares the perspective that food waste prevention initiatives can help reduce costs for businesses. The plan prioritizes Rethinking and Reduction.
69	22-Jun-26	Letter	Fraser Valley Regional District	Local government	Dispose Strategy/Action	Metro Vancouver staff indicated that financial considerations, particularly transportation costs, are the main reason for preferring local disposal over remote landfill options. Could Metro Vancouver provide more detail on how this analysis is done, including what distance would be considered too far? For example, if a new landfill were developed within the FVRD, would Metro Vancouver consider it too remote to be economically viable for their disposal needs?	The draft Solid Waste Management Plan was updated to add comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal. Affordability is incorporated in the draft plan's guiding principles and is a key consideration throughout the plan. Disposal at remote landfills is approximately twice the cost of local disposal options. When comparing the cost of local disposal to remote disposal, transportation costs are a key component of the calculation. The overall cost analysis for disposal options includes costs related to handling garbage at recycling and waste centres proportionally based on the portion of the waste managed at the disposal facility that is initially delivered to a recycling and waste centre. Approximately 60% of the garbage disposed at the Waste-to-Energy Facility is delivered directly to the facility. Your letter mentions the possibility of a new landfill in the FVRD. To consider Metro Vancouver's use of any potential future landfill in the FVRD, Metro Vancouver would seek more information about what is proposed. Metro Vancouver is open to further discussions with the FVRD about future disposal options.
70	22-Jun-26	Letter	Fraser Valley Regional District	Local government	Dispose Strategy/Action	We understand that Metro Vancouver's existing disposal capacity is expected to be sufficient for the 10-year term of the SWMP and that Metro Vancouver is "not working on any long-term disposal options at this point in time, either new landfilling capacity or new waste to energy capacity." Could Metro Vancouver clarify whether it intends to wait until the current SWMP expires before beginning planning and discussions for replacement disposal capacity, or whether that work will begin earlier, such as through a major amendment process? We have concerns that a lack of planning for additional landfill capacity may be used to justify building more incinerators in the future when the issue becomes more urgent due to the long lead time needed for siting and developing new landfills. We would appreciate greater clarity on the anticipated timeline and process Metro Vancouver is considering for planning long-term residual waste disposal.	As of 2026, Metro Vancouver has no plans to pursue additional disposal capacity. As noted in the draft plan, if the Board decided to pursue any new disposal capacity within the region that is reviewable under the <i>Environmental Assessment Act</i> and associated regulations, a plan amendment would be required.

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71	22-Jun-26	Letter	Fraser Valley Regional District	Local government	Dispose Strategy/Action	During the presentation, Metro Vancouver shared graphs showing nitrogen oxide and direct particulate emissions from the incinerator. Sulphur dioxide (SO₂) emissions were not shown. SO₂ remains a significant concern for the FVRD because of its role in forming particulate matter within the airshed. The Lower Fraser Valley Airshed, shared by both Metro Vancouver and the FVRD, is shaped like a funnel. Due to topography and wind patterns, air pollutants tend to accumulate and concentrate within the narrow eastern portions of the airshed, disproportionately impacting the FVRD. The airshed is considered uniquely sensitive due to this tendency. SO₂ emissions react in the atmosphere to form secondary fine particulate matter (PM_{2.5}), adding to the levels of PM_{2.5} already occurring within the region. More than 85 Air Quality Advisories have been issued in the FVRD for high levels of PM_{2.5} since 2015. For the past decade, Metro Vancouver has been operating under interim discharge limits for SO₂ while considering acid gas reduction upgrades needed to bring emissions down. When asked during the presentation when those upgrades will occur, Metro Vancouver's response was they are undertaking studies and will be proposing new discharge limits to the Province later this year. Metro Vancouver staff also added that "working to reduce the SO₂ emissions from the facility is a priority". With that context, we would appreciate clarification on the following: a) Secondary PM_{2.5} formation was not mentioned during the presentation and does not appear to be addressed within the SWMP. How would new discharge limits address the facility's contribution to secondary PM_{2.5} formation within the airshed? b) Could Metro Vancouver clarify how reducing SO₂ emissions is being treated as a priority if, rather than committing to the upgrades needed to reduce emissions, Metro Vancouver intends to seek revised discharge limits instead? c) Our understanding is that the Public Health Risk Assessment study being conducted in consultation with the health authorities intending to inform these limits is still underway. Unless the study has been completed, are you please able to clarify how Metro Vancouver is able to assume that the findings support higher discharge limits? If this study has been completed, please share a copy with the FVRD as we are extremely interested to review it.	The Waste-to-Energy Facility has excellent environmental performance with emissions averaging 15% of regulatory limits in 2025. Metro Vancouver is committed to further enhancing the environmental performance of the Waste-to-Energy facility, including reducing SO₂ emission levels. SO₂ levels in the Lower Fraser Valley have reduced dramatically in the last number of years. According to Metro Vancouver's 2024 Air Quality Summary, SO₂ levels have decreased 80% since 2013 with ambient SO₂ levels well below air quality objectives. Metro Vancouver is pursuing opportunities to lower SO₂ emissions and emission limits for the Waste-to-Energy Facility. As required in the Operational Certificate, testing of potential facility operational modifications to support reduction in discharge limits is underway. Metro Vancouver is also pursuing updates to emissions monitoring as part of its work related to proposing updated emission limits for the Waste-to-Energy Facility. Among the potential updates, Metro Vancouver has commenced testing of condensable particulates in addition to filterable particulates. Proposed updates to emissions monitoring along with proposed updated emission limits will be communicated as part of the submission to the Ministry of Environment and Parks by September 23, 2026. With respect to fine particulate matter (PM_{2.5}) air quality warnings within the FVRD, we agree that reducing fine particulate levels is an important objective. The Waste-to-Energy Facility generates only 0.03% of regional fine particulate emissions. Additionally, the total regional fine particulate emissions do not account for fine particulate generated by wildfires outside of the region which are the primary source of fine particulates that cause air quality warnings. Work on the public health risk assessment is also underway and will be shared publicly as part of the submission to the Ministry of Environment and Parks by September 23, 2026. The study will include analysis based on current emission limits, current actual emissions, and proposed draft emission limits.
72	22-Jun-26	Letter	Fraser Valley Regional District	Local government	Dispose Strategy/Action	When asked why the SWMP does not include a long-term phase-out of the aging Burnaby incinerator, Metro Vancouver stated that waste-to-energy facilities do not have a fixed lifespan because they can be continually upgraded. Metro Vancouver continued by referencing a European incinerator that has operated for more than 100 years. Our review of that facility – the Josefstrasse incinerator in Zurich, Switzerland – suggests that a different lesson could be taught by this example. Although the Swiss facility operated for over a century, it was closed in 2021 because of its age and the high cost of upgrades needed to meet modern environmental standards. Its first major emission-control upgrades were installed only in the late 1980s, meaning its total post-upgrade lifespan was about 34 years, not even as old as Metro Vancouver's incinerator is today. Following closure of the Swiss facility, elevated dioxin levels linked to the facility were also found in a nearby park, leading to public concern and costly cleanup. In our view, this example helps to support the need for Metro Vancouver's SWMP to include phasing out the user their garbage incinerator that than justify how these facilities can safely operate indefinitely. In addition to Josefstrasse, the literature suggests numerous incinerators across Europe are also being shut down due to pollution standards, growing public backlash, and financial challenges due to the loss of public subsidies as waste incineration is no longer classified as green energy by the European Union. Organizations are calling for a moratorium on any new waste incinerators across the EU, including a demand for phase-down strategies of existing incineration capacity.ii Circular economy efforts appear to be reducing the reliance on incineration in Europe, a trend that unfortunately does not appear to be reflected within Metro Vancouver's SWMP.	Nearly all garbage generated in Switzerland is managed via waste-to-energy. This is also the case for a number of other European and Asian countries. With respect to the Josefstrasse facility in particular, information available online suggests that the primary reason for closure of the facility was overcapacity within the Zurich solid waste system noting that in its final years the facility processed waste primarily from Germany. Online news sources also note that freeing up the site for development also was important in the decision to shut-down the facility. Note that in parallel to the closure, a nearby waste-to-energy facility was expanded resulting in a single larger facility with an expanded district energy system being more efficient than two facilities. Waste-to-energy provides an effective and safe alternative to landfilling, with more than 3,000 waste-to-energy facilities operating worldwide. Individual facilities open and close for reasons unique to the specific facility or community. A recent article in the publication Waste & Recycling notes continued growth in the worldwide number of Waste-to-Energy Facilities including growth in Europe. Metro Vancouver recently published a report providing detail on the use of waste-to-energy as a disposal technology. The study shows that communities choose between landfilling and waste-to-energy based on local circumstances. Metro Vancouver's Waste-to-Energy Facility, constructed in 1988, has had regular upgrades to its environmental protection systems. The facility continues to be a safe and cost-effective residual waste disposal option in the region.
73	22-Jun-26	Letter	Fraser Valley Regional District	Local government	Dispose Strategy/Action	We noted Metro Vancouver's acknowledgement that construction and demolition waste is leaking from Metro Vancouver into the FVRD and that Metro Vancouver staff are unable to estimate the amounts because this material bypasses Metro Vancouver's facilities. Given the amount of construction occurring, this could represent significant waste flow. Does Metro Vancouver have suggestions for how this material could be quantified and how to track where it is being sent for processing or disposal? We would be very interested in hearing your ideas on a potential proposal to better understand this waste flow.	The draft plan was revised to add a new action to develop a method to better track and account for construction and demolition waste potentially leaving the region. Metro Vancouver tracks material from licensed construction and demolition processing facilities in the region that is then sent for disposal outside of Metro Vancouver. Metro Vancouver has heard anecdotally that some construction and demolition waste moves from project sites in the Metro Vancouver region directly to facilities in the Fraser Valley, but we have no supporting data to confirm this information. Metro Vancouver would be happy to further discuss this issue.
74	24-Jun-26	Meeting	Waste Management Association of BC	Waste and Recycling Industry	Regulatory Strategic Approach	Is there more information in the SWMP about the details around the ability in SWMP to implement hauler licensing. You said most of the waste is staying within Metro Vancouver, so why is there a need for hauler licensing? We see it as MV is trying to control everything.	The draft plan was revised to add more clarity in the Regulatory Strategic Approach section to describe conditions and the process/engagement for consideration of potential future regulations, as well as specifying the approvals required (e.g. several would require provincial approval to be implemented). Prior to considering any new regulatory measures, like hauler licensing, there would be a transparent engagement process. SWMP's approach is to identify priorities. If for example it was identified that there may be compliance issues with the generator levy, then potentially regulatory measures would be considered and then engaged on.
75	24-Jun-26	Meeting	Waste Management Association of BC	Waste and Recycling Industry	Regulatory Strategic Approach	What do we mean by comprehensive engagement	We would meet provincial requirements/directions for any regulations requiring provincial approval (e.g. hauler licensing).
76	24-Jun-26	Meeting	Waste Management Association of BC	Waste and Recycling Industry	Regulatory Strategic Approach	There are also other potential future regulatory measures. What would precipitate consideration of any of those regulatory measures?	The draft plan was revised to add more clarity in the Regulatory Strategic Approach section to describe conditions and the process/engagement for consideration of potential future regulations, as well as specifying the approvals required (e.g. several would require provincial approval to be implemented). We would engage on any potential updates.
77	24-Jun-26	Meeting	Waste Management Association of BC	Waste and Recycling Industry	Regulatory Strategic Approach	Bylaw 181 was put in place to allow materials to be moved out of regional transfer stations. Now you're not following that intent.	The draft plan includes "Support the effectiveness of the facility licensing system" as a regulatory priority. Any proposed new regulatory measures will be accompanied by a transparent and meaningful engagement process. Engagement will follow Metro Vancouver's Public Engagement Board Policy and Public Engagement Guide. Metro Vancouver will also comply with any provincial requirements related to public consultation.
78	02-Jul-26	Email	Public	Public members-at-large	Accessibility and Inclusion	1. Public Access areas in terms of Multi-Family and Business Recycling (Focus Area 3): I believe both Multi-Family living areas such as condos or apartments and local businesses incur astronomical amounts of waste if not managed properly. The 2036 target of having single-family living units reach a waste diversion rate of 75% while having multi-family units reach a waste diversion of only 60% and commercial/institutional infrastructure 65% ignores the idea of the lack of recycling infrastructure near these units. Especially those in lower-income areas. Thus, I believe it is important to emphasize the infrastructural access disparities of waste management sites for the public. Allowing the Solid Waste Management Plan to further focus on creating more areas of waste management, and therefore increasing the recycling rate of both single and multiple family units.	A focus area of the draft plan is Increase access to organics and recycling services for multi-family residents, businesses, and institutions. As part of this focus area, Metro Vancouver plans to focus efforts to improve recycling in sectors with lower recycling rates such as multi-family and commercial/institutional through consideration of policy and regulatory options, tailored education tools, hauler incentives, and updated space and access requirements. Action 1.4.7 of the draft plan is: Explore ways to measure diversity, equity, and inclusion in solid waste data starting with current practices and gaps. Improving this data will help to identify and address disparities. With respect to infrastructure, the Recycling and Waste Centre Strategic Approach prioritizes new facilities in areas with expected future growth, and reasonable and consistent drive times. Considerations are facility accessibility for cyclists and transit users as the region continues to develop and transportation methods diversify, and siting future facilities close to areas that experience relatively high drive times, accounting for population density.
79	02-Jul-26	Email	Public	Public members-at-large	Accessibility and Inclusion	2. Newcomer Education on Waste Management in Vancouver(Page 35): Vancouver receives hundreds of immigrant families each year. With this rate of immigration expected to only increase in the future. Many of these families are not fluent or even not at all familiar with the language of English. With most waste management information/education being available primarily in English prevents incoming families from creating the new habits needed to increase the rate of waste diversion and recycling. Thus, I believe more importance and funding should be put toward educating incoming families, and diversifying education to accommodate for future families.	Action 3.7.1 of the draft plan is to: Develop waste prevention and reuse programs and education targeting specific sectors that may be unfamiliar with regional waste reduction practices such as newcomers and tourists. Language barriers and education approach would be considered in the implementation of this action.
80	02-Jul-26	Email	Public	Public members-at-large	General	3. Questions Regarding Further Action: - To what extent is plastic pollution an important concern in waste management for Metro Vancouver? If it is a major factor, are there any specific plans in place for implementation to target plastic pollution?	Addressing plastic waste is a focus area of the draft plan: Work with organizations that make, sell, use, collect, and recycle plastics to improve collection of recyclable plastics and eliminate unnecessary and hard to recycle plastics. This will involve continuing to work nationally with organizations that create and manage plastics to promote elimination of unnecessary plastics, design for recyclability, and the use of recycled content in plastic products and packaging and Supporting and advocating for faster implementation of residential collection programs that accept a more consistent and broader range of materials to make recycling easier and more effective. Reducing plastic waste overall will help to reduce plastic pollution.

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81	02-Jul-26	Email	Public	Public members-at-large	General	- What will be the future steps if the Revised Draft is, or is not, accepted by the government? I wish to be a part of this journey in the future to help reach future regional emissions goals.	You can sign up here to keep informed on the status of approval of Metro Vancouver's Solid Waste Management Plan or alternative next steps: https://metrovancover.org/services/solid-waste/solid-waste-engagement-mailing-list
82	06-Jul-26	Letter	Zero Waste BC	Nonprofit organization	General	While we appreciate the enhanced effort that has gone into more robust engagement, we have serious concerns with this plan and the planning process. These issues include concerns around the process: - The plan has taken far too long to develop (7 years for a ten year plan that was due in 2021).	The provincial guide to solid waste management planning recommends that regional districts complete a full plan renewal at the end of the 10-year plan life cycle. The previous plan was approved in 2011. The GVS&DD Board approved initiating the plan update process in 2019. The provincial guide does not set a due date for updated plans.
83	06-Jul-26	Letter	Zero Waste BC	Nonprofit organization	General	The planning process did not meet the Ministry guidelines. Additional review of how the plan compares to Ministry guidelines for waste planning and inclusion of waste to energy in a plan are in Appendix A.	The provincial guide to solid waste management planning helps to clarify ministry policy and the provisions of the Environmental Management Act as they relate to the management of municipal solid waste. It is not a legal document and the information in it does not constitute legal advice or impose any legally binding requirements. The guide is provided as guidance. Regional districts may choose to approach their planning process and document submissions differently; this is acceptable as long as legislative requirements are met.
84	06-Jul-26	Letter	Zero Waste BC	Nonprofit organization	General	- Input and feedback from the PTAC, the Industry Advisory Committee and the public was routinely ignored and very few changes were made as a result of the robust engagement process. This started with ongoing discussions about an appropriate hierarchy, definitions for recycling and diversion, lack of ambition in using the suggestions from the three working groups and concluded in ignoring the 98% of written submissions on the first draft of the plan which called for closing the incinerator (which included a petition of 375 individuals and 10 organizations). Written submissions also showed clear support for stronger targets, use of the Zero Waste hierarchy and investment in zero waste solutions rather than disposal.	Responses to feedback received are publicly posted in the feedback logs and engagement summary reports for each phase. This includes responses to feedback on closing the waste-to-energy facility, stronger targets, use of the Zero Waste hierarchy and investment in zero waste solutions.
85	06-Jul-26	Letter	Zero Waste BC	Nonprofit organization	General	- Notes from the Public Technical and Industry Advisory Committees routinely minimized advice on adopting the zero waste hierarchy and stopping incineration until the Independent Engagement Panel members started attending the meetings following complaints (see ZWBC's letter here).	Meeting notes present a summary of the topics discussed and are not verbatim. Meeting recordings are publicly available for many PTAC meetings. All feedback received was recorded in feedback logs and engagement summary reports for each phase of engagement.
86	06-Jul-26	Letter	Zero Waste BC	Nonprofit organization	General	- There was a lack of transparency on meetings with the Regional Engineers Advisory Committee, Regional Administrators Advisory Committee, Regional Waste Reduction Coordinators, and First Nations.	Feedback received from meetings with the Regional Engineers Advisory Committee, Regional Administrations Advisory Committee, and Regional Waste Reduction Coordinators is published in feedback logs and engagement summary reports for each phase of engagement. As summary of First Nations Engagement for each phase is being provided to the Zero Waste Committee and GVS&DD Board and will be submitted to the Minister of Environment and Parks.
87	06-Jul-26	Letter	Zero Waste BC	Nonprofit organization	General	- Expert consultants were hired but they were not visible after the start of the process and their involvement was very limited.	A consultant was hired to assist with the solid waste management plan update. Their involvement started in 2023 and continued until 2026. During that time period, they completed over 20 presentations to advisory committees, assisted in the development of free technical deliverables and three engagement reports, and conducted engagement activities including public pop ups, interest group sessions, and workshops, and provided their expertise throughout.
88	06-Jul-26	Letter	Zero Waste BC	Nonprofit organization	General	- While there was the positive aspect of more focus on engaging people who may not have participated in the past, no engagement occurred on key regulatory measures that would be needed for a successful plan, which was a missed opportunity and will cause more time delays before implementation.	The draft plan was revised to add more clarity in the Regulatory Strategic Approach section to describe conditions and the process/engagement for consideration of potential future regulations, as well as specifying the approvals required (e.g. several would require provincial approval to be implemented). Metro Vancouver presented the draft regulatory strategic plan to advisory committees including the public/technical advisory committee, the solid waste and recycling industry advisory committee, and the regional engineers advisory committee - solid waste subcommittee. The regulatory strategic plan was part of the plan that was engaged upon during the initial draft plan phase and the final draft plan feedback period.
89	06-Jul-26	Letter	Zero Waste BC	Nonprofit organization	General	There was no analysis for local residual waste disposal options and no analysis of what continued use of the incinerator would cost (despite the fact that a condition assessment report was commissioned in 2023 - redacted version available here, obtained through a FOIPPA request only provided after the Board approved the plan despite a request starting in 2025). There was no analysis of costs, alignment with goals nor GHG or other impacts. When ZWBC provided an analysis using publicly available information, these were ignored or refuted with no supporting evidence.	The draft plan was revised to include enhanced information provided about assessment of residual waste management options, including the use of the study in the development of disposal actions, and the engagement with advisory committees during study development and upon completion. The Waste-to-Energy Facility and Vancouver Landfill are finite resources with each facility having maximum annual disposal capacity, and for the Vancouver Landfill overall long-term capacity. For near-term future planning, the only practical alternative to the Waste-to-Energy Facility and the Vancouver Landfill is contingency disposal at remote private landfills. Metro Vancouver's analysis of disposal costs is presented on pg.102 of the plan. Prioritizing local solutions (solutions within Metro Vancouver region or in close proximity) for solid waste management aligns with the vision and guiding principles of the Solid Waste Management Plan, and is a strategic principle. Local solutions for managing solid waste increase resilience, reduce transportation greenhouse gas emissions, create local employment and economic benefit, and are typically less expensive than solutions in distant communities.
90	06-Jul-26	Letter	Zero Waste BC	Nonprofit organization	General	- Metro Vancouver obfuscated on actual comparable costs of the four options (Zero Waste, Vancouver Landfill, Incinerator, external landfills). Additional information was provided to ZWBC under an FOIPPA request. (See our letter to the Metro Vancouver Board March 24, 2026 and spreadsheet used for calculations)	Metro Vancouver's analysis of disposal costs is presented in the Solid Waste Management Plan. In addition, the draft plan was revised to extend financial projections over the 10-year expected plan duration; provide comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal; and include estimated cost associated with each strategy. Expanded financial projections show expected tipping fee increases to continue at approximately five per cent per year over the 10-year plan timeline.
91						- While time was passing, contracts for the incinerator were getting locked in under the outdated old plan while Metro Vancouver continued to resist implementing pollution mitigation requirements that had been clear since 2011.	A recent public health risk assessment completed in consultation with health authorities concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Waste-to energy costs are consistent with local landfilling, and half of remote landfilling, with costs continuing to be lower over the expected 10-year time frame of the plan. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions from the facility were on average 15 per cent of regulatory limits.
92	06-Jul-26	Letter	Zero Waste BC	Nonprofit organization	Residual Management Strategic Approach	There are also fundamental problems with the plan: - The targets are weak with most missing five year targets and using rolling averages so accountability will be poor.	The draft plan was revised to add a new table identifying how elements of the plan contribute to achieving proposed targets by reducing material generation in specific categories, based on existing waste composition information and the strategies and actions in the plan. In response to similar feedback received during the initial draft plan phase of engagement, a 5-year interim disposal rate target was added to the plan. Rolling averages are only specified for the reduction in waste generation metric, which helps to balance year to year fluctuations.
93			Zero Waste BC	Nonprofit organization		- There are no firm commitments to deliver on the plan (senior staff continue to state to local elected officials that actions will be decided year by year by future boards). This "business casing" approach means that there is no point in having a plan, instead it is a list of unfunded options.	The draft plan was revised to extend financial projections over the 10-year expected plan duration; provide comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal; and include estimated allocation of approved budget associated with each strategy. Actions in the solid waste management 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 targets. Annual reporting on progress to achieve the targets of the Solid Waste Management Plan will assist in prioritizing funding and informing where investments are most appropriately allocated.
94			Zero Waste BC	Nonprofit organization		- The action timetables and budgets lack commitment and detail.	The draft plan was revised to expand the plan implementation schedule including estimated start date for each strategy; details on associated deliverables; information on roles and responsibilities. The draft plan also includes an estimated allocation of approved budget associated with each strategy. Metro Vancouver will apply a business casing approach aligned with the existing annual GVS&DD Board budgeting process based on conditions at the time capital implementation of the actions. This process involves a triple bottom line assessment of capital, operating, and life cycle costs for Metro Vancouver. It also considers cost implications for residents, businesses, and organizations involved in or impacted by each initiative, such as tipping fee changes, as well as potential benefits such as job creation, improved environmental outcomes, and economic benefits realized over a longer timeframe.

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95			Zero Waste BC	Nonprofit organization		- The capital budget beyond the existing approved Metro Vancouver five year budget (which was developed and approved without input from the planning process) has no detail at all (\$510 million capital costs added from draft 1 to draft 2 but does not state what this is for).	The draft plan was revised to extend financial projections over the 10-year expected plan duration. Metro Vancouver's solid waste budget is approved by the GV&DD on an annual basis as part of the overall GV&DD budget. A five-year financial plan is endorsed by the GV&DD Board at the time the budget is approved. Capital expenditures for 2026-2035 are projected to be \$900 million, including \$390 million estimated for 2026-2030. The focus from 2031-2035 will be consistent with 2026-2030 estimates, with the goal of continuing to prevent waste while minimizing tipping fee increases.
96	06-Jul-26	Letter	Zero Waste BC	Nonprofit organization	General	To correct this, the plan should be amended to have: 1. Use the Zero Waste Hierarchy and definition. Have this centred in the plan.	The plan is based on a zero waste hierarchy that prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.
97			Zero Waste BC	Nonprofit organization		2. Set ambitious targets in the time frame of the plan with clear interim targets.	The draft plan has been revised to add a new table identifying how elements of the plan contribute to achieving proposed targets by reducing material generation in specific categories, based on existing waste composition information and the strategies and actions in the plan. Ambitious targets in the updated plan reflect feedback from many stakeholders who emphasized the importance of continuing to reduce waste across all sectors. The plan includes several actions designed to support businesses in achieving these targets through collaboration, innovation, and knowledge sharing. Targets were set based on current waste generation statistics and composition data and are meant to be ambitious but achievable. Progress toward targets will be reported annually and shared publicly.
98			Zero Waste BC	Nonprofit organization		3. A phase out plan for the incinerator (or failing that a clean detailed analysis for residual disposal with social, environmental and financial impacts for all options).	Added comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal. A recent public health risk assessment completed in consultation with health authorities concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions from the facility were on average 15% of regulatory limits. As part of Waste-to-Energy Facility operational certificate requirements, Metro Vancouver conducted a series of technical work including a public health risk assessment in collaboration with health authorities, to support proposing updated emission limits and additional monitoring. Metro Vancouver will conduct engagement prior to submitting final proposed emission limits and additional monitoring for consideration by the Ministry of Environment and Parks. Results of a rooftop monitoring study indicate that particulates accumulating on a warehouse roof near the Waste-to-Energy Facility are not the result of deposition from the facility. Metal, dioxins, and furan concentrations on the warehouse roof, other nearby roofs, in roadside dust and in soils near the Waste-to-Energy Facility are not significantly impacted by emissions from the Waste-to-Energy Facility.
99			Zero Waste BC	Nonprofit organization		4. A clear plan for timing, staffing and funding of zero waste solutions including: a. Waste prevention b. Reuse and Repair c. Recycling and Composting -enhancing programs to be simple and consistent to ensure clean materials are captured properly. Multifamily, business, institutions, industry and construction locations need to have better programs and services. d. Reducing toxicity – actions to decrease the use of toxic materials as well as the emissions of toxic pollution. e. Enforcing and enhancing existing bans with more inspections, a requirement for clear bags and mandatory source separation.	The draft plan was revised to extend financial projections over the 10-year expected plan duration; provide comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal; and include estimated allocation of approved budget associated with each strategy. The draft plan was also revised to expand the plan implementation schedule including estimated start date for each strategy; details on associated deliverables; and information on roles and responsibilities. The draft plan includes many actions focusing on waste prevention, reuse, repair, the circular economy, accessible and consistent recycling and composting, and improved source separation. The draft plan specifies that actions in the plan requiring Metro Vancouver expenditures will be brought forward for consideration by the GV&DD Board through the annual budget process, prioritizing actions where business casing shows the highest potential to advance solid waste management plan targets. Annual reporting will indicate how funds were allocated to initiatives, including metrics on effectiveness. In response to similar feedback received during the initial draft plan phase of engagement, Metro Vancouver added an implementation schedule included in Reference 1 Appendix C and expanded the financial overview section of the plan (page 102).
100			Zero Waste BC	Nonprofit organization		5. Inclusion of consumption-based emissions metrics associated with actions.	Consumption-based emissions are considered in the draft plan under Action 1.4.3. (Develop methods for estimating and reporting environmental and economic benefits for waste prevention actions such as reduction of greenhouse gas emissions (potentially including embodied carbon), potential cost savings, affordability, and life-cycle impacts.)
101			Zero Waste BC	Nonprofit organization		6. A commitment to transparency with clear, regular reporting and using the zero waste definitions for recycling. Diversion should not include any items sold as or burned for fuel.	Metro Vancouver will continue to report annually on solid waste management statistics including the targets and applicable secondary metrics outlined in the draft plan and will explore increasing transparency and access to data through a public dashboard of solid waste management plan performance indicators. Transparency and accountability are guiding principles of the solid waste management plan. Definitions are provided in the glossary of the draft plan and are based on provincial definitions where available. Where a feasible alternative exists, Metro Vancouver aims to manage materials according to the highest applicable level of the waste hierarchy (e.g. recycling before recovery). Recovering energy and resources from non-recyclable materials is preferable to disposal according to Metro Vancouver's waste hierarchy, which is consistent with the provincial and federal hierarchies. In response to similar feedback received during the idea generation phase, recovery was added to the initial draft hierarchy for clarity and consistency with provincial and federal hierarchies. Additional clarity was also provided on how diversion is calculated.
102	06-Jul-26	Letter	Zero Waste BC	Nonprofit organization	General	Provided a detailed table - Comparing Metro Vancouver's draft SWMP to Provincial guidelines The Metro Vancouver draft Solid Waste Management Plan and process have been compared to two sets of provincial guidelines: the first is for solid waste management planning and the second is for inclusion of waste to energy in a plan.	Metro Vancouver will include a copy of the provincial checklist in the plan submission package that describes how the submission follows the Guide . The following information was taken from the provincial guide to solid waste management planning: "This Guide helps to clarify ministry policy and the provisions of the <i>Environmental Management Act</i> as they relate to the management of municipal solid waste. This Guide is not a legal document and the information in it does not constitute legal advice or impose any legally binding requirements." (pg.2) "This document is provided as guidance. Regional districts may choose to approach their planning process and document submissions differently; this is acceptable as long as legislative requirements are met. " (pg.6) Metro Vancouver's Waste-to-Energy facility is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling, with the cost continuing to be lower over the plan's 10-year expected timeline. Emissions from the Waste-to Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators.

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103	06-Jul-26	Email	Nanaimo Recycling Exchange	Nonprofit organization	General	This Pollution Prevention Hierarchy was developed by Nanaimo Recycling Exchange as part of a document titled "Deconstruction Deconstructed." The hierarchy below, with rationale and purpose of each waste prevention principle is based on original Pollution Prevention principles, rather than economic principles of Waste Management. This hierarchy is recommended as a template for Solid Waste Management Plans. This hierarchy was designed as a waste prevention tool; used correctly in design and planning stages, the tool drives behaviours like ReThink, Reduce at Source, and Reuse by Design in order to prevent waste and pollution. When used correctly, there isn't much waste that needs a new use, recycling, or disposal. Prevention is the point. Applying any options below dotted lines to find uses for wasted materials is a corruption of waste prevention principles and the tool. Pretending the outcome is waste reduction is not only physically impossible, it's also too late—waste can't be unwasted. Diversion from landfill to options on the hierarchy cannot reduce waste that already exists. In most cases, more pollution and waste is created from the practice. Diversion from landfill simply moves wasted material around and makes it unrecognizable as waste. Jobs are created and money is made calling it Reuse, Reduce, Recycle, and Recovery of Energy. Landfills don't get full. Everyone happy. Diversion of CRD demolition/deconstruction waste from landfill is a smoke and mirrors diversion from the primary blunder of wasting a house. Waste haulers make houses disappear.	The plan is based on a zero waste hierarchy that prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.
104	06-Jul-26	Email	Nanaimo Recycling Exchange	Nonprofit organization	Rethink Strategy/Action	ReThinking the concept of waste is the most important tool for preventing waste. That's why it's the first and the biggest section of the pollution prevention triangle. The purpose of ReThink was implemented to change thinking that leads to waste: In 1971, the World Consultation on the Use of Wood concluded, "(e) In establishing national housing programmes, governments should consider the economic advantage of short-life... lightweight wood construction that may readily be replaced totally or partially. Such a policy would inject an element of flexibility in urban and rural development and permit the timely adoption of higher standards of living for the population." https://www.fao.org/3/c3848e/c3848e01.htm ReThink in 1971 would have challenged the concept of short-life construction, and prevented waste and resource destruction. Rather than short life construction, ease of disassembly for reuse could have been incorporated into design. If ReThink had occurred in 1971, reuse by design would be in place, preventing wasted CRD lumber from getting burned as fuel today.	Rethink is the most preferred option in the plan's waste hierarchy.
105	06-Jul-26	Email	Nanaimo Recycling Exchange	Nonprofit organization	Reduce Strategy/Action	When the 3R's were first introduced, Reduce meant reduction at source: the idea was to conserve resources and prevent waste. In construction, Reduce would have meant cut fewer trees, make less cement and steel, and build smaller homes. Oops, reduce economic growth? That didn't last. What did last? Persistent indoctrination that waste and pollution is a reasonable trade-off for progress and economic success. Failure to incorporate Reduce at source resulted in decades of record consumption and waste. As government landfills got full, new definitions of Reduce were invented: 1. Reduce environmental impact of waste, and/or 2. Reduce waste after the waste has been created. This new definition was needed so the term Reduce could then be applied to waste: no need for prevention. Used this way, Reduce gives the impression that waste and waste impact reduction can be achieved by unfounded and futile practices like diversion of wasted materials from landfill. 1. Reduce environmental impact: A house gets demolished. It is not possible to reduce environmental impact from extraction, manufacturing and global transportation of materials it took to build that house. Further, the exact same extraction, manufacturing, and global transportation process is repeated to build a replacement house, likely larger than the original. Addition isn't reduction. It is not possible to reduce the environmental impact of wasted materials by choosing to recycle or reuse the material. It's too late. Comparing environmental impact of a standing house to that same house demolished into waste is insufficient to draw conclusions about environmental impact. Life Cycle Analysis of every resource and actively needed to build, live in, demolish, replace, and live in the replacement house would be needed. This data doesn't exist. Comparing so called environmental impact of recycling or reusing the wasted materials is an egregious abuse of the waste prevention definition of Reduce at Source. 2. Reduce waste: It is not possible to reduce waste after waste has been created. Taking a house down creates waste where none existed. Reducing the size of the pile by grinding the good lumber to burn as fuel at lumber mills does not change the fact that the lumber was wasted. Crushing the concrete for fill or road base, or to make piles on private land cannot change the fact that the concrete was wasted. Even if you Reduce your thinking enough to believe these activities reduce waste after wasting a house, there is still the problem that hauling wasted resources around trying to get rid of them also creates more waste and more pollution. The concept of reducing waste is faulty and the practices are counter-productive. Thinking up something to do with a wasted resource is called diversion from landfill. It does not reduce environmental impact of waste, and it does not reduce the waste. No prevention. More waste. More money. Old trick. Abdication of the original Pollution Prevention Hierarchy "Reduce at Source" definition was the monumental failure to prevent waste, pollution, and resource depletion. Mountains of waste predictably and inevitably followed.	Metro Vancouver's glossary includes a definition for reduce based on the provincial definition from the guide to solid waste management planning: Reduce means decreasing the amount of municipal solid waste generated at source. It includes activities which result in more efficient reuse or recycling of primary products or materials but does not include only compacting or otherwise densifying the waste.
106	06-Jul-26	Email	Nanaimo Recycling Exchange	Nonprofit organization	Reuse Strategy/Action	The original definition of Reuse is for products used for the same purpose as conceived, for the life cycle of the product, without repair or refurbishment or remanufacturing. It is assumed that durability and safety are built into the design to allow maximum rotation of uses. That is why it must be Reuse by Design. Reuse by design is meant to preserve resources to prevent waste. It cannot be used to reduce waste that has been created. Avalon Dairy reuses glass containers designed for Reuse. Reuse of waste is a different matter. Consciously removing a product from the intended use, and then trying to find another (re)use for it assumes the material is not at end of life and therefore - fails the test by definition of reuse, and - fails as a waste prevention strategy. Finding uses for wasted materials cannot prevent waste or preserve resources, and cannot be called Reuse. Finding use for wasted material also cannot make up for the need to extract new resources to replace the product. As long as there is little interest in Reuse by Design in construction, renovation, or deconstruction/demolition, and only small market uptake of CRD waste for reuse, it is best to leave structures untouched and in use. While the BC Building Code allows salvaged lumber to be used for structural purposes in principle, that does not mean it will be approved during the construction permitting process. Deconstruction, therefore, does not guarantee preservation of dimensional lumber, often 40% by weight of salvaged material from deconstruction, and therefore does not mitigate destruction of a viable structure. Surprisingly little standard material from deconstruction can be marketed for resale beyond small market DIY purposes. Niche market heritage and wide plank lumber requires transporting, storing, and marketing, and sale or use is not guaranteed. Dimensional lumber	Metro Vancouver's glossary includes a definition for reuse based on the provincial definition from the guide to solid waste management planning: Reuse refers to at least one further use of a product in the same form (but not necessarily for the same purpose).

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107	06-Jul-26	Email	Nanaimo Recycling Exchange	Nonprofit organization	Recycle Strategy/Action	Recycling was defined in the 60's and 70's as "reprocessing of waste into products, materials or substances, not necessarily for the original purpose, though it retains the possibility of being used for a similar purpose." Recycling was designed to make use of "end of life" material, that could no longer perform its original task, in order to slow the accumulation of waste showing up in landfills. True story. It was also thought that recycling could "save resources" if end of life materials were used to make similar or other useful products. Saving resources was never the promise to replace primary production using virgin materials. After decades of exhaustive experimentation, the fact remains: Recycling doesn't replace primary virgin production of anything. All recycled material is a downgrade from the original virgin material. Some recycled content can be mixed with virgin materials to make a similar product, but recycled content ceilings are untested and will never match virgin content percentages. Recycling is also more costly and resource intensive, and cannot rival quality of virgin production. Unlike Reuse, Recycling was designed for end-of-life waste. By definition, it won't be what it was, but it might be something useful. Recycling wasted (end of use, not end of life) material is another matter. Wasting materials before end of life and then finding some use for them, is not recycling. - Wasted concrete is not recycled. It is crushed and used as road base or fill on private land. - Wasted Asphalt is not recycled. Some is ground and used as new paving mix, most is used as road base or fill on private land. - Asphalt shingles are not recycled into new shingles, but they can be used in paving mix. According to pavers, the product is difficult to use and has a shorter life span than virgin asphalt. Asphalt shingles are often rejected for recycling, and more often sold as kiln fuel. For all these reasons, recycling is useful only as a delay to landfill or other disposal. Very little recycling occurs from new construction, renovation, deconstruction, or demolition. There are "potentially recyclable" leftovers from CRD, but collecting materials in a bin does not mean they will be recycled. - It's too costly to sort, separate, haul, and pay tip fees. - There is almost no technology for recycling CRD. - Costs of recycling can't compete with revenue contracts for fuel supply or with cheap landfill tip fees. - Recycling feedstock has little value: end products are low grade, and have low market demand. - Recycled material cannot compete with virgin material price or quality. Most products will be tossed into the single bin so they can be disposed as contaminated construction waste. Garbage is cheaper to manage than recycling. That's why recycling, at this point, is helpful for the single purpose of delaying landfill. Design for recyclability is a corruption of the original purpose of recycling and a corruption of pollution prevention principles. Design for recyclability is planned obsolescence disguised as sliced bread. Until there are nationally mandated definitions of recycling, the Wild, Wild Waste will prosper. Recycling does not include operations that use material as fuel to recover energy from waste. Burning materials—for fuel or energy—is disposal, not recycling. Supply of materials for burning usually produces revenue; that's an easy way to tell the difference. Supply of materials for fuel competes heavily with recycling, and may eventually replace recycling for some products. But, that's not a good enough reason to call it recycling. What might get recycled from CRD? - Metal is easily sorted and separated for recycling because of market value. - Cardboard is sorted and separated for recycling, if market price is high. - Drywall (sorted, date stamped or certified free of asbestos) can be transported to the mainland and recycled for a fee. About 35% of wasted drywall is recycled. It's a lost cause to think much construction waste can be recycled. It's a lost cause to think there are viable recycling markets for any amounts of construction waste.	Metro Vancouver's glossary includes a definition for recycling based on the provincial definition from the guide to solid waste management planning: Recycling is the collection, transportation and processing of products that are no longer useful in their present form and the subsequent use, including composting or anaerobic digestion, of their material content in the manufacture of new products for which there is a market.
108	06-Jul-26	Email	Nanaimo Recycling Exchange	Nonprofit organization	Recover Strategy/Action	This category used to be called Resource Recovery. It is now called Energy from Waste or Waste to Energy, WtE. New language has hijacked purpose of this category. Resource Recovery was designed to preserve material from products at true "end of life with no further potential as a whole product." Once the product could not be used for the original purpose, various materials in the product were to be preserved for other uses. Resource Recovery importantly acknowledged all resources as finite and depletable and encouraged extended use of all materials. This category has undergone some of the most egregious uses of language and definitions to enable practices of incineration. Language of "finite and depletable" got replaced with "renewable." Recovery of materials has been corrupted and replaced with recovery of energy from burning materials. End of life is no longer criteria: the only requirement is for anyone to stop using something and call it "waste." There is no imaginable reason why burning lumber for energy in a lumber mill to make more lumber should be acceptable. Someone decided if waste is diverted from landfill and burned, and energy is "recovered" then the amount of waste is reduced. Burning the evidence doesn't reduce waste that has been wasted. Ash makes a smaller pile than wood so people call WtE waste reduction, but "wasted" applies to the pile of wood. There is also no way to know if WtE reduces pollution. GHG's from Waste to Energy are reported from the energy sector, giving the false impression that the practice reduces overall emissions from the waste sector. Canada's energy sector reported increased emissions in 2023: emissions from the waste sector are unaccounted for.	Metro Vancouver's glossary includes a definition for recovery based on the provincial definition from the guide to solid waste management planning: Recovery in the context of this plan is the reclaiming energy from municipal solid waste. This does not include food recovery, composting, anaerobic digestion, or waste-to-energy. Recovery of components for recycling is counted as recycling rather than recovery to provide greater transparency for reporting.
109	06-Jul-26	Council presentation	District of North Vancouver	Local government	General	- Expressed appreciation for dedication of staff - Unprecedented level of engagement and communication - Praised Metro Vancouver regional leaders in North America - Highlighted the Zero Waste Conference, emphasized the importance of reuse and repair, praised repair cafes (and advocated for their expansion in libraries in DNV) - Appreciative of having recycling and waste centre in DNV, and pink boxes - Encouraged everyone to visit Urban Repurpose or take part in Reuse Days	Metro Vancouver appreciates the involvement of the District of North Vancouver and our other member jurisdictions throughout the plan development process.
110	06-Jul-26	Council presentation	District of North Vancouver	Local government	Financial Overview	Question about staff report suggesting potential higher tipping fees	Affordability is a guiding principle of the solid waste management plan and that MV budget is approved each year by GVS&DD. Currently 5%/year targets. Often driven by facility operating contract fees.
111	06-Jul-26	Council presentation	District of North Vancouver	Local government	General	Commented that the ideal scenario would be where doing the right thing was also the most cost effective option	Thank you for your comment
112	06-Jul-26	Council presentation	District of North Vancouver	Local government	Member Actions	Question about whether municipal actions are led by municipalities or Metro Vancouver. Need clarity on what is needed of us	The draft plan was revised to expand the plan implementation schedule including estimated start date for each strategy; details on associated deliverables; information on roles and responsibilities.
113	06-Jul-26	Council presentation	District of North Vancouver	Local government	General	Question about multi-family recycling rate being much lower than single-family, and the multi-family recycling target is quite a big change from the current state	Municipal actions are often areas where Metro Vancouver is leading or it is a joint initiative, and municipalities have key roles in the success of the initiative. The process will involve continuous engagement with municipalities as we move forward and prioritize actions for implementation.
114	06-Jul-26	Council presentation	District of North Vancouver	Local government	General	Comment that other utilities have statistics comparing municipalities – is that something we can do for solid waste, to highlight best practices and encourage municipalities to pursue those best practices that are highlighted	Challenging to accurately characterize waste arriving at a recycling and waste centre as originating from particular municipalities as haulers move between municipalities and facilities. Metro Vancouver does share best practices at REAC Solid Waste Sub-Committee and in reports to the Zero Waste Committee.
115	06-Jul-26	Council presentation	District of North Vancouver	Local government	Dispose Strategy/Action	Question about Vancouver Landfill lifespan	Metro Vancouver described new Vancouver Landfill agreement extending the lifetime of the landfill to up to 2050 with a benefit of more than \$300 million in avoided future tipping fees
116	06-Jul-26	Council presentation	District of North Vancouver	Local government	Dispose Strategy/Action	Question about what waste is being shipped out of region	About 15% of waste can't be managed at the Vancouver Landfill or Waste-to-Energy Facility, and is therefore shipped to remote landfills ("contingency disposal")
117	07-Jul-26	Email	Public	Public members-at-large	General	Despite extensive collective efforts—including participation in the Public Technical Advisory Committee, hosting engagements, conducting analysis, meeting with Metro Vancouver staff and elected officials, submitting a petition with over 350 signatures calling for the closure of the incinerator and a shift toward zero waste, and providing feedback on the draft plan—I am disheartened to see that the final plan does not reflect the key issues raised. To ensure the plan aligns with the principles of sustainability, accountability, and public health, I urge the following amendments: 1. Adopt the Zero Waste Hierarchy and Definition: Center this framework in the plan to prioritize waste reduction, reuse, and recycling over disposal.	The plan is based on a zero waste hierarchy that prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.

No.	Date	Source/Material	Organization/Group	Sector/Audience	Plan Section	Feedback/Comment	Metro Vancouver Response
118	07-Jul-26	Email	Public	Public members-at-large	General	2. Set Ambitious Targets: Establish clear, time-bound interim targets to track progress toward zero waste.	Added a new table identifying how elements of the plan contribute to achieving proposed targets by reducing material generation in specific categories, based on existing waste composition information and the strategies and actions in the plan. Ambitious targets in the updated plan reflect feedback from many stakeholders who emphasized the importance of continuing to reduce waste across all sectors. The plan includes several actions designed to support businesses in achieving these targets through collaboration, innovation, and knowledge sharing. Targets were set based on current waste generation statistics and composition data and are meant to be ambitious but achievable. Progress toward targets will be reported annually and shared publicly.
119	07-Jul-26	Email	Public	Public members-at-large	General	3. Phase Out the Incinerator: Develop a concrete plan to phase out the incinerator, or, at minimum, provide a detailed analysis of residual disposal options, including their social, environmental, and financial impacts.	The draft plan was revised to add a comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal. A recent public health risk assessment completed in consultation with health authorities concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions from the facility were on average 15% of regulatory limits. As part of Waste-to-Energy Facility operational certificate requirements, Metro Vancouver conducted a series of technical work including a public health risk assessment in collaboration with health authorities, to support proposing updated emission limits and additional monitoring. Metro Vancouver will conduct engagement prior to submitting final proposed emission limits and additional monitoring for consideration by the Ministry of Environment and Parks. Results of a rooftop monitoring study indicate that particulates accumulating on a warehouse roof near the Waste-to-Energy Facility are not the result of deposition from the facility. Metal, dioxins, and furan concentrations on the warehouse roof, other nearby roofs, in roadside dust and in soils near the Waste-to-Energy Facility are not significantly impacted by emissions from the Waste-to-Energy Facility.
120	07-Jul-26	Email	Public	Public members-at-large	General	4. Comprehensive Zero Waste Plan: Include a clear roadmap for: - Waste Prevention: Reducing waste at the source. - Reuse and Repair: Expanding programs to extend the lifespan of products. - Recycling and Composting: Enhancing programs to ensure simplicity, consistency, and accessibility for all sectors, including multifamily residences, businesses, institutions, and industries. - Reducing Toxicity: Implementing measures to decrease the use of hazardous materials and emissions. - Enforcement: Strengthening existing bans with inspections, clear bag requirements, and mandatory source separation.	The draft plan was revised to expand the plan implementation schedule including estimated start date for each strategy; details on associated deliverables; and information on roles and responsibilities . The draft plan includes many actions focusing on waste prevention, reuse, repair, the circular economy, accessible and consistent recycling and composting, and improved source separation . The draft Solid Waste Management Plan specifies that actions in the plan requiring Metro Vancouver expenditures will be brought forward for consideration by the GVS&DD Board through the annual budget process, prioritizing actions where business casing shows the highest potential to advance solid waste management plan targets. Annual reporting will indicate how funds were allocated to initiatives, including metrics on effectiveness.
121	07-Jul-26	Email	Public	Public members-at-large	General	5. Consumption-Based Emissions Metrics: Incorporate metrics to assess the environmental impact of consumption patterns and align actions with climate goals.	Consumption-based emissions are considered in the draft plan under Action 1.4.3. (Develop methods for estimating and reporting environmental and economic benefits for waste prevention actions such as reduction of greenhouse gas emissions (potentially including embodied carbon), potential cost savings, affordability, and life-cycle impacts.)
122	07-Jul-26	Email	Public	Public members-at-large	General	6.Commitment to Transparency: Ensure regular reporting using zero waste definitions for recycling. Diversion rates must exclude items sold as fuel or burned for energy, as these do not represent true waste reduction. The Ministry of Environment will play a pivotal role in approving this plan. We urge you to prioritize these amendments to create a sustainable, equitable, and transparent waste management strategy for Metro Vancouver.	Metro Vancouver will continue to report annually on solid waste management statistics including the targets and applicable secondary metrics outlined in the draft plan and will explore increasing transparency and access to data through a public dashboard of solid waste management plan performance indicators. Transparency and accountability are guiding principles of the solid waste management plan. Definitions are provided in the glossary of the draft plan and are based on provincial definitions where available. Where a feasible alternative exists, Metro Vancouver aims to manage materials according to the highest applicable level of the waste hierarchy (e.g. recycling before recovery). Recovering energy and resources from non-recyclable materials is preferable to disposal according to Metro Vancouver's waste hierarchy, which is consistent with the provincial and federal hierarchies. In response to similar feedback received during the idea generation phase, recovery was added to the initial draft hierarchy for clarity and consistency with provincial and federal hierarchies. Additional clarity was also provided on how diversion is calculated.
123	08-Jul-26	Email	Public	Public members-at-large	General	My key feedback is to amend the plan to include: 1. Use the Zero Waste Hierarchy and definition. Have this centred in the plan. 2. Set ambitious targets in the time frame of the plan with clear interim targets. 3. A phase out plan for the incinerator (or failing that a clean detailed analysis for residual disposal with social, environmental and financial impacts for all options). 4. A clear plan for timing, staffing and funding of zero waste solutions including: a. Waste prevention b. Reuse and Repair c. Recycling and Composting -enhancing programs to be simple and consistent to ensure clean materials are captured properly. Multifamily, business, institutions, industry and construction locations need to have better programs and services. d. Reducing toxicity - actions to decrease the use of toxic materials as well as the emissions of toxic pollution e. Enforcing and enhancing existing bans with more inspections, a requirement for clear bags and mandatory source separation. 5. Inclusion of consumption-based emissions metrics associated with actions. 6. A commitment to transparency with clear, regular reporting and using the zero waste definitions for recycling. Diversion should not include any items sold as or burned for fuel.	The plan is based on a zero waste hierarchy that prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort. The draft plan was revised to expand the plan implementation schedule including estimated start date for each strategy; details on associated deliverables; information on roles and responsibilities. The draft plan was revised to extend financial projections over the 10-year expected plan duration; provided comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal; included estimated allocation of approved budget associated with each strategy.
124	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	General	our review of the final draft plan, the issues raised by Zero Waste BC, and recent international discussion on responsible residuals management, including biological stabilization before landfilling. The final plan includes expanded discussion of waste prevention, reuse, recycling, organics, construction and demolition materials, and circular economy language. HSR recognizes these additions. However, the plan still lacks several of the practical commitments needed to achieve meaningful progress in those areas. It also continues to rely heavily on downstream disposal and post-disposal activities to achieve many of its desired outcomes. Core concern The plan says more about preventing waste, but it does not sufficiently shift funding, enforcement, staff resources, regulatory effort, or infrastructure planning toward preventing discards and waste before they enter the disposal system.	Where a feasible alternative exists, Metro Vancouver aims to manage materials according to the highest applicable level of the waste hierarchy (e.g. recycling before recovery). Recovering energy and resources from non-recyclable materials is preferable to disposal according to Metro Vancouver's waste hierarchy, which is consistent with the provincial and federal hierarchies.

No.	Date	Source/Material	Organization/Group	Sector/Audience	Plan Section	Feedback/Comment	Metro Vancouver Response
125	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	General	Limited improvements acknowledged: The final plan includes clearer targets, some sector-specific diversion targets, stronger focus areas, and more discussion of prevention, reuse, organics, plastics, construction and demolition materials, accessibility, and public reporting. Core recommendations remain unresolved: HSR's central recommendations on diversion accounting, the Zero Waste Hierarchy, enforceable delivery mechanisms, dedicated upstream investment, black/opaque bag inspection, and the evidentiary basis for long-term incineration reliance have not been fully addressed. Residuals management remains incomplete: The plan continues to focus on energy recovery, landfill gas utilization, bottom ash use, and optimization of existing disposal facilities. It does not establish residuals management as a harm-reduction function, nor does it evaluate biological stabilization before landfilling. Approval should be conditional: HSR does not recommend approval of the plan in its current form without revisions or approval conditions that address the issues below.	The draft plan was revised to include: -A new table identifying how elements of the plan contribute to achieving proposed targets by reducing material generation in specific categories, based on existing waste composition information and the strategies and actions in the plan. -More clarity in the Regulatory Strategic Approach section to describe conditions and the process/engagement for consideration of potential future regulations, as well as specifying the approvals required (e.g. several would require provincial approval to be implemented) -A comparison of disposal costs over 10 years for the Vancouver Landfill, Waste-to-Energy Facility and Contingency Disposal -Enhanced information provided about assessment of residual waste management options, including the use of the study in the development of disposal actions, and the engagement with advisory committees during study development and upon completion.
126	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry		Provided a detailed table - Comparing Metro Vancouver's draft SWMP to HSR recommendations previously provided and assess how feedback was incorporated	In response to similar feedback received during the idea generation phase, recovery was added to the initial draft hierarchy for clarity and consistency with provincial and federal hierarchies. Additional clarity was also provided on how diversion is calculated.
127	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	Recover Strategy/Action	1. Waste hierarchy and recovery language remain problematic The plan continues to use a Metro Vancouver hierarchy that includes energy recovery as a level above disposal. HSR does not support this approach. Energy recovery, refuse-derived fuel, use of discards in cement kilns, and other fuel-substitution pathways destroy materials and remove them from productive material circulation. These activities should not be presented as equivalent to recycling, composting, or material conservation. If Metro Vancouver chooses not to adopt the Zero Waste Hierarchy, the plan should clearly explain that it is using an alternative waste hierarchy and should avoid implying that energy recovery is part of a Zero Waste approach. More importantly, the performance metrics must not reward fuel substitution or energy recovery as diversion.	The plan is based on a zero waste hierarchy that prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.
128	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	Secondary Metrics	2. Diversion accounting must be corrected HSR's most significant remaining concern is the treatment of recovery and diversion. The plan defines the diversion rate as including material recycled plus material used to create alternatives to fossil fuels. This blurs a critical distinction between source-separated recycling and downstream recovery or fuel substitution. Diversion should measure materials prevented from entering disposal through waste prevention, reuse, source-separated recycling, and source-separated composting or anaerobic digestion. Once a material has entered the residuals or disposal system, the opportunity for diversion has passed. Any recovery after that point may still provide environmental benefit, but it should be reported separately. This is particularly important for materials recovered from incinerator ash, bottom ash used in construction materials, refuse-derived fuels, and materials sent to cement kilns or other industrial combustion processes. Counting these pathways as diversion creates a poor precedent by encouraging jurisdictions to improve reported diversion statistics through post-disposal recovery rather than preventing disposal in the first place.	The plan is based on a zero waste hierarchy that prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.
129	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	Financial Overview	3. Funding and implementation remain weighted toward downstream management The final plan includes substantial language on prevention, reuse, repair, circular economy, and recycling. However, the financial and implementation framework does not demonstrate a comparable shift in resources toward those outcomes. Metro Vancouver's own expenditure table shows \$5.5 million allocated to Rethink, Reduce, and Reuse compared with \$120 million allocated to Recover and Dispose in the 2026 operating budget. The plan also states that many actions will be brought forward later through annual budget processes and business cases. This means that many of the actions most important for prevention and reuse remain dependent on future decisions rather than being committed within the plan itself. HSR is not suggesting Metro Vancouver must own or operate every reuse, recycling, repair, composting, or processing system. Many of these systems are best delivered by private industry, non-profits, producer responsibility organizations, social enterprises, member jurisdictions, First Nations, and community partners. However, the plan should clearly show how Metro Vancouver will help these systems develop and perform through policy, procurement, regulation, land-use support, data collection, market development, partnerships, targeted funding, and enforcement.	The draft plan has been revised to extend financial projections over the 10-year expected plan duration; provided comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal; included estimated allocation of approved budget associated with each strategy
130	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	Targets/Metrics	4. Sector-specific targets need stronger reporting and accountability HSR supports the addition of sector-specific diversion targets for single-family, multi-family, commercial/institutional, and construction and demolition sectors. This is an improvement from prior drafts. However, sector targets need to be supported by separate annual reporting, interim targets, and action-specific accountability. Construction and demolition diversion should not be used to mask underperformance in residential, multi-family, or IC&I systems. The plan should report generation, disposal, recycling, composting, recovery, and contamination by sector wherever data allows. Metro Vancouver should also report total tonnes alongside per-capita metrics. Per-capita targets are useful, but total generation and total disposal remain important for infrastructure planning, greenhouse gas impacts, and public accountability.	The draft plan has been revised to add a new table identifying how elements of the plan contribute to achieving proposed targets by reducing material generation in specific categories, based on existing waste composition information and the strategies and actions in the plan. Ambitious targets in the updated plan reflect feedback from many stakeholders who emphasized the importance of continuing to reduce waste across all sectors. The plan includes several actions designed to support businesses in achieving these targets through collaboration, innovation, and knowledge sharing. Targets were set based on current waste generation statistics and composition data and are meant to be ambitious but achievable. Progress toward targets will be reported annually and shared publicly. Metro Vancouver will continue to report annually on solid waste management statistics including the targets and applicable secondary metrics outlined in the draft plan and will explore increasing transparency and access to data through a public dashboard of solid waste management plan performance indicators.
131	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	Dispose Strategy/Action	5. Disposal bans and inspections require stronger commitments HSR continues to recommend stronger use of Metro Vancouver's existing disposal bans and inspection authorities. Education alone will not deliver the required level of source separation across multi-family, IC&I, and construction and demolition sectors. The plan should require loads to be meaningfully inspectable. This can be achieved through clear bag requirements, limits on opaque bags, safe protocols for opening and inspecting black bags, or other inspection systems that prevent bagged waste from bypassing enforcement. Non-inspectable loads should not receive an automatic pass. The plan should include inspection frequency targets, standardized inspection protocols, public reporting of inspection outcomes by material and sector, escalating consequences for repeat offenders, and compliance plans for generators or haulers with repeated banned-material violations.	At Metro Vancouver's solid waste facilities, loads are inspected for materials banned from disposal such as recyclables. Surcharges apply if these banned materials are found. The disposal ban program helps encourage separation of recyclables by creating a financial disincentive for disposing of banned materials. By strengthening this program Metro Vancouver can keep more recyclable material out of the garbage. Strategy 4.8 is "Enhance approaches to Metro Vancouver's disposal ban program". This includes pursuing options to enhance disposal ban inspection efficacy such as innovative detection technologies and clear bag policies, review and expanding materials included, and business casing increasing the number of disposal ban inspections.
132	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	Dispose Strategy/Action	6. Continued reliance on the Waste-to-Energy Facility remains insufficiently justified HSR previously requested the evidentiary basis for continued inclusion of the Burnaby Waste-to-Energy Facility as a necessary component of the plan. The final plan does not provide a sufficient response. The facility is an aging mass-burn incinerator that handles roughly a quarter of the region's garbage and produces significant quantities of fly ash and bottom ash. The plan describes electricity generation, metals recovery, district energy, and potential beneficial use of bottom ash. These descriptions do not demonstrate that continued operation through the plan horizon is necessary, lower risk, or preferable to other residual management pathways under realistic waste reduction scenarios. Metro Vancouver should provide transparent comparative analysis of residual management options, including lifecycle financial costs, capital reinvestment, emissions, ash management, regulatory risk, public health considerations, enforceability of disposal bans, climate alignment, and the consequences of declining residual volumes. If the facility remains in the plan, the plan should include a pathway to reduce dependence on it as prevention, reuse, recycling, and organics diversion improve.	The draft plan was revised to add a comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal. A recent public health risk assessment completed in consultation with health authorities concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions from the facility were on average 15% of regulatory limits.

No.	Date	Source/Material	Organization/Group	Sector/Audience	Plan Section	Feedback/Comment	Metro Vancouver Response
133	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	Dispose Strategy/Action	7. Residuals management should focus on minimizing harm Once materials enter the residuals management system, the policy objective should shift. The goal should no longer be improving diversion statistics or maximizing energy recovery. The primary objective should be minimizing further harm to human health and the environment. This means reducing pollution, minimizing greenhouse gas emissions, preventing leachate and air impacts, safely containing hazardous constituents, managing ash and other residuals conservatively, and reducing long-term environmental liability. Recovery of recyclable materials from residuals can still provide environmental benefit, but it should remain secondary to harm reduction and should be reported separately from diversion. The plan should clearly distinguish between pre-disposal material conservation and post-disposal residual management. Without this distinction, the plan risks treating downstream correction as if it were equivalent to successful waste prevention or recycling.	Disposal is considered a last resort in the plan. The waste hierarchy prioritizes waste prevention, reduction, reuse and recycling over recovery and disposal. Materials recovered from the residuals stream and then recycled are considered recycling in Metro Vancouver's solid waste statistics.
134	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	Dispose Strategy/Action	8. Biological stabilization before landfilling should be evaluated HSR recommends that Metro Vancouver add biological stabilization of fermentable residual materials before landfilling to its residuals management work program. This should be considered as part of responsible landfill management and residual harm reduction, not as diversion. International discussion and European practice increasingly recognize that landfilling untreated residual waste can create avoidable methane, leachate, odour, and long-term management risks. Mechanical-biological treatment or biological stabilization can reduce the biological activity of residual waste before landfilling. In some systems, anaerobic digestion may be used to recover biogas, but final stabilization of mixed residual organics generally requires an aerobic step before landfilling. Metro Vancouver should study whether biological stabilization is appropriate for residual waste streams that cannot currently be prevented, reused, recycled, or composted. The study should evaluate environmental benefits, costs, emissions, land requirements, technology options, compatibility with the Vancouver Landfill and remote landfills, and potential impacts on disposal capacity. Any stabilized residuals must still be reported as disposal, not diversion.	Strategies and actions in the solid waste management plan reflect the themes and priorities heard from residents and businesses across the region. Strategies and actions were selected based on research, engagement feedback, and a third-party assessment of options based on economic, environment and social impacts. Biological stabilization was not selected as a priority for this solid waste management plan, but we appreciate your feedback and are open to discussing further.
135	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	General	9. Plan approval should require conditions or revisions HSR does not recommend approval of the plan as currently written. At minimum, the Metro Vancouver Board and the Ministry of Environment and Parks should require revisions or approval conditions addressing the issues in this submission. HSR also recommends that significant changes to disposal infrastructure, Waste-to-Energy Facility operations, bottom ash beneficial use, major residual treatment facilities, new disposal capacity, or long-term disposal contracts be subject to transparent public review and, where appropriate, plan amendment processes before implementation.	The draft plan has been revised to clearly identify major plan changes which would necessitate public engagement and approval by the Minister of Environment and Parks. Revisions are intended to align with the approach in the provincial <i>A Guide to Solid Waste Management Planning</i>
136	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	General	Recommended revisions before approval HSR Zero Waste recommends that Metro Vancouver revise the plan, or that Ministry approval include conditions requiring Metro Vancouver to: 1. Adopt the Zero Waste Hierarchy and definitions, or clearly state where Metro Vancouver's hierarchy differs and ensure performance metrics do not reward energy recovery or fuel substitution as diversion.	The plan is based on a zero waste hierarchy that prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.
137	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	General	2. Revise diversion accounting so that diversion includes only prevention, reuse, source-separated recycling, and source-separated composting or anaerobic digestion. Post-disposal recovery should be reported separately.	The plan is based on a zero waste hierarchy that prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.
138	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	General	3. Create separate public reporting for residential, multi-family, IC&I, and construction and demolition sectors, including total tonnes generated, recycled, composted, recovered, and disposed.	Metro Vancouver publicly reports separately on tonnes generated, recycled and disposed for residential, multi-family, commercial/institutional and construction and demolition sectors and is exploring increasing transparency and access to data through a public dashboard of solid waste management plan performance indicators.
139	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	General	4. Set clear interim targets within the plan period, not only 2036 and 2050 targets, and identify corrective actions if targets are not being met.	Ambitious targets in the updated plan reflect feedback from many stakeholders who emphasized the importance of continuing to reduce waste across all sectors. The plan includes several actions designed to support businesses in achieving these targets through collaboration, innovation, and knowledge sharing. Targets were set based on current waste generation statistics and composition data and are meant to be ambitious but achievable. Progress toward targets will be reported annually and shared publicly. The plan contains an interim disposal target for 2031.
140	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	General	5. Establish a funded implementation schedule for waste prevention, reuse, repair, source separation, organics, recycling, and construction and demolition material reduction, including assigned responsibility and staff/resource requirements.	The plan implementation schedule has been expanded to include estimated start date for each strategy; details on associated deliverables; and information on roles and responsibilities
141	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	General	6. Strengthen disposal bans through clear or inspectable bag requirements, standardized inspection protocols, increased inspection frequency, public reporting, and escalating enforcement.	At Metro Vancouver's solid waste facilities, loads are inspected for materials banned from disposal such as recyclables. Surcharges apply if these banned materials are found. The disposal ban program helps encourage separation of recyclables by creating a financial disincentive for disposing of banned materials. By strengthening this program Metro Vancouver can keep more recyclable material out of the garbage. Strategy 4.8 is "Enhance approaches to Metro Vancouver's disposal ban program". This includes pursuing options to enhance disposal ban inspection efficacy such as innovative detection technologies and clear bag policies, review and expanding materials included, and business casing increasing the number of disposal ban inspections.
142	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	General	7. Provide a transparent comparative residual management analysis, including lifecycle financial, environmental, regulatory, public health, climate, and enforcement considerations for the Waste-to-Energy Facility, Vancouver Landfill, remote landfills, biological stabilization, and other options.	The plan has been updated to include enhanced information about assessment of residual waste management options, including the use of the study in the development of disposal actions, and the engagement with advisory committees during study development and upon completion.
143	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	General	8. Develop a strategy to reduce long-term reliance on mass-burn incineration as waste prevention and source separation improve.	Waste-to-energy is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions from the facility were on average 15% of regulatory limits.
144	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	General	9. Evaluate biological stabilization of fermentable residual materials before landfilling as part of responsible landfill management and residual harm reduction.	Strategies and actions in the solid waste management plan reflect the themes and priorities heard from residents and businesses across the region. Strategies and actions were selected based on research, engagement feedback, and a third-party assessment of options based on economic, environment and social impacts. Biological stabilization was not selected as a priority for this solid waste management plan, but we appreciate your feedback and are open to discussing further.
145	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	General	10. Apply the precautionary principle to bottom ash, fly ash, and any proposed beneficial use of incinerator residues, including full transparency on testing, destination, liability, and long-term environmental risk.	The use of processed bottom ash as an input to cement plants reduces the use of mined materials and reduces greenhouse gas emissions through reduced mining and transportation requirements. Metro Vancouver developed a bottom ash management plan in 2020. The plan includes comprehensive sampling, analysis, and public reporting programs. The plan explicitly describes the use of bottom ash that has been processed through the non-ferrous metal recovery system as an acceptable input to the cement process. The Ministry of Environment and Climate Change Strategy accepted the bottom ash management plan in 2021. Processed bottom ash is integrated into the cement kiln system ahead of the combustion elements of the cement production, and as such is subject to all of the same environmental processes as other input materials. There is no requirement to track the ultimate location of the processed bottom ash as it is incorporated into the general cement process, and mixed with all of the other input materials. It would be impractical and unnecessary to track given the large volumes of materials involved, and the comprehensive environmental protection systems in place to manage the bottom ash. Bottom ash testing data, the bottom ash management plan, and the bottom ash management plan Ministry of Environment and Climate Change Strategy acceptance letter are all located at: https://metrovancover.org/services/solid-waste/reports-and-operational-certificate Fly ash is not beneficially used and is disposed of responsibly a facility outside of the Metro Vancouver region. Fly ash testing reports are available at the link above.

No.	Date	Source/Material	Organization/Group	Sector/Audience	Plan Section	Feedback/Comment	Metro Vancouver Response
146	08-Jul-26	Letter	HSR Zero Waste	Waste and Recycling Industry	General	11. Ensure major disposal infrastructure changes, bottom ash use, new residual treatment facilities, or long-term disposal contracts are subject to public review and plan amendment where appropriate.	The draft plan has been revised to clearly identify major plan changes which would necessitate public engagement and approval by the Minister of Environment and Parks. Revisions are intended to align with the approach in the provincial <i>A Guide to Solid Waste Management Planning</i>
147	09-Jul-26	Meeting	Restaurants Canada	Food service	General	Call with Restaurants Canada. Asked questions about EPR revenue, expanding reuse, and consistency across member jurisdictions.	Metro Vancouver provided clarifications about EPR, reuse initiatives, and elements of the draft plan that promote consistency across the region.
148	10-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	I feel the targets it sets are not very ambitious considering how advanced climate change is already. We need to act much faster than the plan currently indicates.	Ambitious targets in the updated plan reflect feedback from many stakeholders who emphasized the importance of continuing to reduce waste across all sectors. The plan includes several actions designed to support businesses in achieving these targets through collaboration, innovation, and knowledge sharing. Targets were set based on current waste generation statistics and composition data and are meant to be ambitious but achievable. Progress toward targets will be reported annually and shared publicly.
149	10-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	I would like to see a plan for the phasing out of the incinerator. Burning of waste is a significant contributor to greenhouse gas emissions.	The draft plan was revised to add a comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal. A recent public health risk assessment completed in consultation with health authorities concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions from the facility were on average 15% of regulatory limits.
150	14-Jul-26	Email	Surfrider Foundation Canada	Nonprofit organization	General	1. Use the Zero Waste Hierarchy and definition in the Solid Waste Management Plan. A clear peer-reviewed definition and hierarchy will drive progressive action. Eliminate the goals for recovery in favour of more work on reduction.	The plan is based on a zero waste hierarchy that prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.
151	14-Jul-26	Email	Surfrider Foundation Canada	Nonprofit organization	Targets/Metrics	2. Set ambitious targets to match those of the Capital Regional District or Regional District of Nanaimo. Targets should be for waste generation reduction and diversion (meaning recycling and composting, not burning of material). Targets should be set for five years (2032) and ten years (2037) and not only in the future beyond the time frame of the plan.	Ambitious targets in the updated plan reflect feedback from many stakeholders who emphasized the importance of continuing to reduce waste across all sectors. The plan includes several actions designed to support businesses in achieving these targets through collaboration, innovation, and knowledge sharing. Targets were set based on current waste generation statistics and composition data and are meant to be ambitious but achievable. Progress toward targets will be reported annually and shared publicly.
152	14-Jul-26	Email	Surfrider Foundation Canada	Nonprofit organization	Dispose Strategy/Action	3. Commit to phasing out the Burnaby incinerator. This 38 year old facility is aging and will require significant capital upgrades and maintenance if it is not retired as most incinerators close at 25-30 years. Over \$400 million of capital costs have been forecast in Metro Vancouver budgets. The waste burner is also one of the top 25 point sources of GHGs in the whole province and a key emitter of other pollutants such as dioxins, mercury, cadmium, lead, acid gases and NOx. Dioxins have been found in high concentrations on the incinerator roof and nearby rooftops. It is neither cleaner than landfills nor cheaper and is a roadblock to reducing waste. Firmly commit to not building or using any new incineration or thermal treatment facilities.	The draft plan was revised to add a comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal. A recent public health risk assessment completed in consultation with health authorities concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions from the facility were on average 15% of regulatory limits.
153	14-Jul-26	Email	Surfrider Foundation Canada	Nonprofit organization	Reduce Strategy/Action	4. Invest in zero waste solutions such as redesign, reduce, repair, reuse, composting and recycling. Ensure the plan actions are beyond just testing, encouraging and piloting to be more active such as implement, enact, develop, etc. Actions should include: - Waste prevention such as cutting unnecessary packaging and preventing food waste. - Reuse and Repair: making it easier so unusable items do not get thrown out. - Recycling and Composting: enhancing programs to be simple and consistent to ensure clean materials are captured properly. Multifamily, business, institutions, industry and construction locations need to have better programs and services. - Reducing toxicity: include actions to decrease the use of toxic materials as well as the emission of toxic pollution - Enforcing and enhancing existing bans with more inspections, a requirement for clean bags and mandatory source separation.	The plan is based on a zero waste hierarchy that prioritizes waste prevention and reduction, with disposal (including waste-to-energy) as a last resort. The draft plan was revised to expand the plan implementation schedule including estimated start date for each strategy, details on associated deliverables, and information on roles and responsibilities. The plan also now includes cost estimates for each strategy.
154	14-Jul-26	Email	Surfrider Foundation Canada	Nonprofit organization	Targets/Metrics	5. Measure and work to reduce the climate footprint of materials by including consumption-based emissions on the planning and proposed actions.	Consumption-based emissions are considered in the draft plan under Action 1.4.3. (Develop methods for estimating and reporting environmental
155	14-Jul-26	Email	Surfrider Foundation Canada	Nonprofit organization	Financial Overview	6. Establish and commit to a timeline for the actions and the associated budget to ensure the plan can be implemented.	The draft plan was revised to expand the plan implementation schedule including estimated start date for each strategy; details on associated deliverables; information on roles and responsibilities. The draft plan also now expands financial projections over the 10-year expected plan duration and includes estimated allocation of approved budget associated with each strategy
156	14-Jul-26	Email	Surfrider Foundation Canada	Nonprofit organization	Plan Monitoring	7. Pledge to be transparent – report waste performance clearly so the public can see what is working. Do not call burning of waste recycling or diversion as burning waste creates pollution and ash and should be treated as disposal.	Metro Vancouver will continue to report annually on solid waste management statistics including the targets and applicable secondary metrics outlined in the draft plan and will explore increasing transparency and access to data through a public dashboard of solid waste management plan performance indicators. Transparency and accountability are guiding principles of the solid waste management plan. Definitions are provided in the glossary of the draft plan and are based on provincial definitions where available. Where a feasible alternative exists, Metro Vancouver aims to manage materials according to the highest applicable level of the waste hierarchy (e.g. recycling before recovery). Recovering energy and resources from non-recyclable materials is preferable to disposal according to Metro Vancouver's waste hierarchy, which is consistent with the provincial and federal hierarchies. In response to similar feedback received during the idea generation phase, recovery was added to the initial draft hierarchy for clarity and consistency with provincial and federal hierarchies. Additional clarity was also provided on how diversion is calculated.
157	14-Jul-26	Email	Surfrider Foundation Canada	Nonprofit organization	Financial Overview	8. Spend money wisely and invest in the future- choose solutions that reduce waste without locking the region into expensive disposal systems.	The draft plan was revised to add a comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling.
158	15-Jul-26	Email	Public	Public members-at-large	General	1. Use the Zero Waste Hierarchy and definition. Have this centred in the plan.	The plan is based on a zero waste hierarchy that prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.
159	15-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	2. Set ambitious targets in the time frame of the plan with clear interim targets.	Ambitious targets in the updated plan reflect feedback from many stakeholders who emphasized the importance of continuing to reduce waste across all sectors. The plan includes several actions designed to support businesses in achieving these targets through collaboration, innovation, and knowledge sharing. Targets were set based on current waste generation statistics and composition data and are meant to be ambitious but achievable. Progress toward targets will be reported annually and shared publicly.

No.	Date	Source/Material	Organization/Group	Sector/Audience	Plan Section	Feedback/Comment	Metro Vancouver Response
160	15-Jul-26	Email	Public	Public members-at-large	Dispose Strategy/Action	3. include a phase-out plan for the incinerator (or failing that a clean detailed analysis for residual disposal with social, environmental and financial impacts for all options).	The draft plan was revised to add a comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal. A recent public health risk assessment completed in consultation with health authorities concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfiling, and half of remote landfiling. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions from the facility were on average 15% of regulatory limits.
161	15-Jul-26	Email	Public	Public members-at-large	Reduce Strategy/Action	4. include a clear plan for timing, staffing and funding of zero waste solutions including: a. Waste prevention b. Reuse and Repair c. Recycling and Composting-enhancing programs to be simple and consistent to ensure clean materials are captured properly. Multifamily, business, institutions, industry and construction locations need to have better programs and services. d. Reducing toxicity - actions to decrease the use of toxic materials as well as the emissions of toxic pollution. e. Enforcing and enhancing existing bans with more inspections, a requirement for clear bags and mandatory source separation.	The draft plan was revised to expand the plan implementation schedule including estimated start date for each strategy; details on associated deliverables; information on roles and responsibilities
162	15-Jul-26	Email	Public	Public members-at-large	Glossary	5. Include of consumption-based emissions metrics associated with actions.	Consumption-based emissions are considered in the draft plan under Action 1.4.3. (Develop methods for estimating and reporting environmental
163	15-Jul-26	Email	Public	Public members-at-large	Glossary	6. A commitment to transparency with clear, regular reporting and using the zero waste definitions for recycling. Diversion should not include any items sold as or burned for fuel.	Metro Vancouver will continue to report annually on solid waste management statistics including the targets and applicable secondary metrics outlined in the draft plan and will explore increasing transparency and access to data through a public dashboard of solid waste management plan performance indicators. Transparency and accountability are guiding principles of the solid waste management plan. Definitions are provided in the glossary of the draft plan and are based on provincial definitions where available. Where a feasible alternative exists, Metro Vancouver aims to manage materials according to the highest applicable level of the waste hierarchy (e.g. recycling before recovery). Recovering energy and resources from non-recyclable materials is preferable to disposal according to Metro Vancouver's waste hierarchy, which is consistent with the provincial and federal hierarchies. In response to similar feedback received during the idea generation phase, recovery was added to the initial draft hierarchy for clarity and consistency with provincial and federal hierarchies. Additional clarity was also provided on how diversion is calculated.
164	16-Jul-26	Email	Public	Public members-at-large	Dispose Strategy/Action	I note that the final plan on the Metro Vancouver Incinerator does not address any of the key challenges of the plan. It definitely does not provide for the shutting down of this incinerator. I therefore write to urge you to amend the plan to include: 3. A phase out plan for the incinerator (or failing that a clean detailed analysis for residual disposal with social, environmental and financial impacts for all options). This is important for the health of all those living in the Metro Vancouver area. Air quality affects life and longevity.	The draft Solid Waste Management Plan was revised to add a comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfiling, and half of remote landfiling. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions averaged 15% of Operational Certificate limits. As part of Waste-to-Energy Facility operational certificate requirements, Metro Vancouver conducted a series of technical work including a public health risk assessment in collaboration with health authorities, to support proposing updated emission limits and additional monitoring. The public health risk assessment concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Metro Vancouver will conduct engagement prior to submitting final proposed emission limits and additional monitoring for consideration by the Minister of Environment and Parks. Results of a rooftop monitoring study indicate that particulates accumulating on a warehouse roof near the Waste-to-Energy Facility are not the result of deposition from the facility. Metal, dioxins, and furan concentrations on the warehouse roof, other nearby roofs, in roadside dust and in soils near the Waste-to-Energy Facility are not significantly impacted by emissions from the Waste-to-Energy Facility.
165	16-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	1. Use the Zero Waste Hierarchy and definition. Have this centred in the plan.	The plan is based on a zero waste hierarchy that prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.
166	16-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	2. Set ambitious targets in the time frame of the plan with clear interim targets	Ambitious targets in the updated plan reflect feedback from many stakeholders who emphasized the importance of continuing to reduce waste across all sectors. The plan includes several actions designed to support businesses in achieving these targets through collaboration, innovation, and knowledge sharing. Targets were set based on current waste generation statistics and composition data and are meant to be ambitious but achievable. Progress toward targets will be reported annually and shared publicly.
167	16-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	5. Inclusion of consumption-based emissions metrics associated with actions.	Consumption-based emissions are considered in the draft plan under Action 1.4.3. (Develop methods for estimating and reporting environmental and economic benefits for waste prevention actions such as reduction of greenhouse gas emissions (potentially including embodied carbon), potential cost savings, affordability, and life-cycle impacts.)
168	16-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	6. A commitment to transparency with clear, regular reporting and using the zero waste definitions for recycling. Diversion should not include any items sold as or burned for fuel.	Metro Vancouver will continue to report annually on solid waste management statistics including the targets and applicable secondary metrics outlined in the draft plan and will explore increasing transparency and access to data through a public dashboard of solid waste management plan performance indicators. Transparency and accountability are guiding principles of the solid waste management plan. Definitions are provided in the glossary of the draft plan and are based on provincial definitions where available. Where a feasible alternative exists, Metro Vancouver aims to manage materials according to the highest applicable level of the waste hierarchy (e.g. recycling before recovery). Recovering energy and resources from non-recyclable materials is preferable to disposal according to Metro Vancouver's waste hierarchy, which is consistent with the provincial and federal hierarchies. In response to similar feedback received during the idea generation phase, recovery was added to the initial draft hierarchy for clarity and consistency with provincial and federal hierarchies. Additional clarity was also provided on how diversion is calculated.

No.	Date	Source/Material	Organization/Group	Sector/Audience	Plan Section	Feedback/Comment	Metro Vancouver Response
169	16-Jul-26	Email	Public	Public members-at-large	Reduce Strategy/Action	4. A clear plan for timing, staffing and funding of zero waste solutions including: a. Waste prevention b. Reuse and Repair c. Recycling and Composting -enhancing programs to be simple and consistent to ensure clean materials are captured properly. Multifamily, business, institutions, industry and construction locations need to have better programs and services. d. Reducing toxicity - actions to decrease the use of toxic materials as well as the emissions of toxic pollution. e. Enforcing and enhancing existing bans with more inspections, a requirement for clear bags and mandatory source separation.	The draft plan was revised to extend financial projections over the 10-year expected plan duration; provide comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal; and include estimated allocation of approved budget associated with each strategy. The draft plan was also revised to expand the plan implementation schedule including estimated start date for each strategy; details on associated deliverables; and information on roles and responsibilities. The draft plan includes many actions focusing on waste prevention, reuse, repair, the circular economy, accessible and consistent recycling and composting, and improved source separation. The draft plan specifies that actions in the plan requiring Metro Vancouver expenditures will be brought forward for consideration by the Greater Vancouver Sewerage & Drainage District Board through the annual budget process, prioritizing actions where business casing shows the highest potential to advance solid waste management plan targets. Annual reporting will indicate how funds were allocated to initiatives, including metrics on effectiveness. In response to similar feedback received during the initial draft plan phase of engagement, Metro Vancouver added an implementation details and expanded the financial overview section of the plan.
170	16-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	1. Use the Zero Waste Hierarchy and definition. Have this centred in the plan.	The plan is based on a zero waste hierarchy that prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.
171	16-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	2. Set ambitious targets in the time frame of the plan with clear interim targets.	The draft plan was revised to add a new table identifying how elements of the plan contribute to achieving proposed targets. Ambitious targets in the updated plan reflect feedback from many stakeholders who emphasized the importance of continuing to reduce waste across all sectors. The plan includes several actions designed to support businesses in achieving these targets through collaboration, innovation, and knowledge sharing. Targets were set based on current waste generation statistics and composition data and are meant to be ambitious but achievable. Progress toward targets will be reported annually and shared publicly.
172	16-Jul-26	Email	Public	Public members-at-large	Dispose Strategy/Action	3. A phase out plan for the incinerator (or failing that a clean detailed analysis for residual disposal with social, environmental and financial impacts for all options).	The draft Solid Waste Management Plan was revised to add a comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions averaged 15% of Operational Certificate limits. As part of Waste-to-Energy Facility operational certificate requirements, Metro Vancouver conducted a series of technical work including a public health risk assessment in collaboration with health authorities, to support proposing updated emission limits and additional monitoring. The public health risk assessment concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Metro Vancouver will conduct engagement prior to submitting final proposed emission limits and additional monitoring for consideration by the Minister of Environment and Parks. Results of a rooftop monitoring study indicate that particulates accumulating on a warehouse roof near the Waste-to-Energy Facility are not the result of deposition from the facility. Metal, dioxins, and furan concentrations on the warehouse roof, other nearby roofs, in roadside dust and in soils near the Waste-to-Energy Facility are not significantly impacted by emissions from the Waste-to-Energy Facility.
173	16-Jul-26	Email	Public	Public members-at-large	Reduce Strategy/Action	4. A clear plan for timing, staffing and funding of zero waste solutions including: a. Waste prevention b. Reuse and Repair c. Recycling and Composting -enhancing programs to be simple and consistent to ensure clean materials are captured properly. Multifamily, business, institutions, industry and construction locations need to have better programs and services. d. Reducing toxicity - actions to decrease the use of toxic materials as well as the emissions of toxic pollution. e. Enforcing and enhancing existing bans with more inspections, a requirement for clear bags and mandatory source separation.	The draft plan was revised to extend financial projections over the 10-year expected plan duration; provide comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal; and include estimated allocation of approved budget associated with each strategy. The draft plan was also revised to expand the plan implementation schedule including estimated start date for each strategy; details on associated deliverables; and information on roles and responsibilities. The draft plan includes many actions focusing on waste prevention, reuse, repair, the circular economy, accessible and consistent recycling and composting, and improved source separation. The draft plan specifies that actions in the plan requiring Metro Vancouver expenditures will be brought forward for consideration by the Greater Vancouver Sewerage & Drainage District Board through the annual budget process, prioritizing actions where business casing shows the highest potential to advance solid waste management plan targets. Annual reporting will indicate how funds were allocated to initiatives, including metrics on effectiveness. In response to similar feedback received during the initial draft plan phase of engagement, Metro Vancouver added an implementation details and expanded the financial overview section of the plan.
174	16-Jul-26	Email	Public	Public members-at-large	Reduce Strategy/Action	5. Inclusion of consumption-based emissions metrics associated with actions.	Consumption-based emissions are considered in the draft plan under Action 1.4.3. (Develop methods for estimating and reporting environmental
175	16-Jul-26	Email	Public	Public members-at-large	Reduce Strategy/Action	6. A commitment to transparency with clear, regular reporting and using the zero waste definitions for recycling. Diversion should not include any items sold as or burned for fuel.	Metro Vancouver will continue to report annually on solid waste management statistics including the targets and applicable secondary metrics outlined in the draft plan and will explore increasing transparency and access to data through a public dashboard of solid waste management plan performance indicators. Transparency and accountability are guiding principles of the solid waste management plan. Definitions are provided in the glossary of the draft plan and are based on provincial definitions where available. Where a feasible alternative exists, Metro Vancouver aims to manage materials according to the highest applicable level of the waste hierarchy (e.g. recycling before recovery). Recovering energy and resources from non-recyclable materials is preferable to disposal according to Metro Vancouver's waste hierarchy, which is consistent with the provincial and federal hierarchies. In response to similar feedback received during the idea generation phase, recovery was added to the initial draft hierarchy for clarity and consistency with provincial and federal hierarchies. Additional clarity was also provided on how diversion is calculated.
176	19-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	Thank you for accepting feedback on the management plan. Such a huge undertaking! Despite a circular economy focus, the plan needs these improvements: 1. Use and integrate the Zero Waste Hierarchy and definition.	The plan is based on a zero waste hierarchy that prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.
177	19-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	2. Set ambitious targets in the time frame of the plan with clear interim targets (ie. SMART goals).	The draft plan was revised to add a new table identifying how elements of the plan contribute to achieving proposed targets. Ambitious targets in the updated plan reflect feedback from many stakeholders who emphasized the importance of continuing to reduce waste across all sectors. The plan includes several actions designed to support businesses in achieving these targets through collaboration, innovation, and knowledge sharing. Targets were set based on current waste generation statistics and composition data and are meant to be ambitious but achievable. Progress toward targets will be reported annually and shared publicly.

No.	Date	Source/Material	Organization/Group	Sector/Audience	Plan Section	Feedback/Comment	Metro Vancouver Response
178	19-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	5. Consumption-based emissions metrics associated with actions.	Consumption-based emissions are considered in the draft plan under Action 1.4.3. (Develop methods for estimating and reporting environmental
							Metro Vancouver will continue to report annually on solid waste management statistics including the targets and applicable secondary metrics outlined in the draft plan and will explore increasing transparency and access to data through a public dashboard of solid waste management plan performance indicators. Transparency and accountability are guiding principles of the solid waste management plan. Definitions are provided in the glossary of the draft plan and are based on provincial definitions where available. Where a feasible alternative exists, Metro Vancouver aims to manage materials according to the highest applicable level of the waste hierarchy (e.g. recycling before recovery). Recovering energy and resources from non-recyclable materials is preferable to disposal according to Metro Vancouver's waste hierarchy, which is consistent with the provincial and federal hierarchies. In response to similar feedback received during the idea generation phase, recovery was added to the initial draft hierarchy for clarity and consistency with provincial and federal hierarchies. Additional clarity was also provided on how diversion is calculated.
179	19-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	6. A commitment to transparency with clear, regular reporting and using the zero waste definitions for recycling. Diversion should not include any items sold-as or burned-for fuel.	
180	19-Jul-26	Email	Public	Public members-at-large	Dispose Strategy/Action	Thank you for your consideration! Wishing you all the best in this last phase of plan approval. Please keep your eye on the far future for the sake of our kids, their kids, and their kids' kids.	The vision of the plan is A thriving region where nothing is wasted and resources are valued. Environmental stewardship and climate action are guiding principles of the plan. The plan will be monitored and reported on annually, and a plan update will be initiated ten years from the approval date of the plan to ensure emerging issues continue to be addressed.
181	19-Jul-26	Email	Public	Public members-at-large	Reduce Strategy/Action	4. A clear plan for timing, staffing and funding of zero waste solutions including: a. Waste prevention. b. Reuse and Repair. c. Recycling and Composting. (Enhance programs to be simple and consistent to properly capture clean materials. Multifamily, business, institutions, industry and construction locations need to have better programs and services.) d. Reduced toxicity. (Actions to decrease the use of toxic materials as well as the emissions of toxic pollution.) e. Enforced and enhanced existing bans with more inspections, a requirement for clear bags, and mandatory source separation.	The draft plan was revised to extend financial projections over the 10-year expected plan duration; provide comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal; and include estimated allocation of approved budget associated with each strategy. The draft plan was also revised to expand the plan implementation schedule including estimated start date for each strategy; details on associated deliverables; and information on roles and responsibilities. The draft plan includes many actions focusing on waste prevention, reuse, repair, the circular economy, accessible and consistent recycling and composting, and improved source separation. The draft plan specifies that actions in the plan requiring Metro Vancouver expenditures will be brought forward for consideration by the Greater Vancouver Sewerage & Drainage District Board through the annual budget process, prioritizing actions where business casing shows the highest potential to advance solid waste management plan targets. Annual reporting will indicate how funds were allocated to initiatives, including metrics on effectiveness. In response to similar feedback received during the initial draft plan phase of engagement, Metro Vancouver added an implementation details and expanded the financial overview section of the plan.
182	21-Jul-26	Email	EverGen Infrastructure Corp.	Waste and Recycling Industry	Recycle Strategy/Action	Section 4.2.2 mentions the need to "Support the development of additional local organics processing through leveraging Metro Vancouver procurement processes for organics management." It should be noted that there is significant organic waste processing capacity already in the Lower Mainland, Sea to Sky corridor and Interior all of whom currently process organics from Metro Vancouver and the FVRD. The addition of an additional organic's processing facility would be detrimental to existing facilities that are already in need of additional organic waste tonnages. What would be more valuable and economical is to have Metro Vancouver outline and present it's organic waste disposal requirements to the Waste Industry. The Waste Industry will be able to provide processing solutions without requiring Metro Vancouver to build additional infrastructure.	Metro Vancouver will continue to discuss organics management with the solid waste and recycling industry as part of Action 4.2.2. Estimated existing capacity will be an important step in this process.
183	21-Jul-26	Email	Public	Public members-at-large	Reduce Strategy/Action	Please plan for the far future using ambitious targets and effective education as you manage waste. Education 1. Use the Zero Waste Hierarchy and definition. Promote widely in schools and stores.	The plan is based on a zero waste hierarchy that prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.
184						2. Simple and consistent composting and recycling in all streams.	"A solid waste and recycling system that is affordable, convenient, and consistent across the region." is a guiding principle of the plan and will be considered in all aspects of plan implementation.
185						3. Reduce use of toxic materials in industry, institutions/govt, businesses, homes.	Metro Vancouver is responsible for planning for waste prevention, reduction, reuse, and recycling, and operating a series of solid waste facilities located around the region. This work is guided by commitment to environmental stewardship, and affordable and accessible waste management services.
186						4. Inspect and enforce to increase effectiveness of bans and separation.	Strategy 4.8 of the plan is "Enhance approaches to Metro Vancouver's disposal ban program" and considers options to enhance disposal ban inspection efficacy.
187	21-Jul-26	Email	Public	Public members-at-large	Dispose Strategy/Action	Targets 1. Phase out the incinerator; with options for timing and interim disposal of residue.	The draft plan was revised to extend financial projections over the 10-year expected plan duration, including estimated allocation of approved budget associated with each strategy. The plan implementation schedule was also expanded including estimated start date for each strategy; details on associated deliverables; and information on roles and responsibilities. A recent public health risk assessment completed in consultation with health authorities concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions from the facility were on average 15% of regulatory limits.
188	21-Jul-26	Email	Public	Public members-at-large	Dispose Strategy/Action	2. Transparent funding of zero waste solutions - with timing and staffing. We can do so much more - waste prevention - reuse - repair	The draft plan was revised to extend financial projections over the 10-year expected plan duration; provide comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal; and include estimated allocation of approved budget associated with each strategy. The draft plan was also revised to expand the plan implementation schedule including estimated start date for each strategy; details on associated deliverables; and information on roles and responsibilities. The draft plan includes many actions focusing on waste prevention, reuse, repair, the circular economy, accessible and consistent recycling and composting, and improved source separation. The draft plan specifies that actions in the plan requiring Metro Vancouver expenditures will be brought forward for consideration by the Greater Vancouver Sewerage & Drainage District Board through the annual budget process, prioritizing actions where business casing shows the highest potential to advance solid waste management plan targets. Annual reporting will indicate how funds were allocated to initiatives, including metrics on effectiveness. In response to similar feedback received during the initial draft plan phase of engagement, Metro Vancouver added an implementation details and expanded the financial overview section of the plan

No.	Date	Source/Material	Organization/Group	Sector/Audience	Plan Section	Feedback/Comment	Metro Vancouver Response
189	22-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	I'm a resident of Vancouver concerned about the improvement of zero waste practices in the city and I'm writing to submit feedback for amending the Metro Vancouver Solid Waste Management Plan. I believe the following priorities should be included: 1. Use the Zero Waste Hierarchy and definition. Have this centred in the plan.	The plan is based on a zero waste hierarchy that prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.
190	22-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	2. Set ambitious targets in the time frame of the plan with clear interim targets.	The draft plan was revised to add a new table identifying how elements of the plan contribute to achieving proposed targets. Ambitious targets in the updated plan reflect feedback from many stakeholders who emphasized the importance of continuing to reduce waste across all sectors. The plan includes several actions designed to support businesses in achieving these targets through collaboration, innovation, and knowledge sharing. Targets were set based on current waste generation statistics and composition data and are meant to be ambitious but achievable. Progress toward targets will be reported annually and shared publicly.
191	22-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	5. Inclusion of consumption-based emissions metrics associated with actions.	Consumption-based emissions are considered in the draft plan under Action 1.4.3. (Develop methods for estimating and reporting environmental an
192	22-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	6. A commitment to transparency with clear, regular reporting and using the zero waste definitions for recycling. Diversion should not include any items sold as or burned for fuel.	Metro Vancouver will continue to report annually on solid waste management statistics including the targets and applicable secondary metrics outlined in the draft plan and will explore increasing transparency and access to data through a public dashboard of solid waste management plan performance indicators. Transparency and accountability are guiding principles of the solid waste management plan. Definitions are provided in the glossary of the draft plan and are based on provincial definitions where available. Where a feasible alternative exists, Metro Vancouver aims to manage materials according to the highest applicable level of the waste hierarchy (e.g. recycling before recovery). Recovering energy and resources from non-recyclable materials is preferable to disposal according to Metro Vancouver's waste hierarchy, which is consistent with the provincial and federal hierarchies. In response to similar feedback received during the idea generation phase, recovery was added to the initial draft hierarchy for clarity and consistency with provincial and federal hierarchies. Additional clarity was also provided on how diversion is calculated.
193	22-Jul-26	Email	Public	Public members-at-large	Dispose Strategy/Action	3. A phase out plan for the incinerator (or failing that a clean detailed analysis for residual disposal with social, environmental and financial impacts for all options).	A recent public health risk assessment completed in consultation with health authorities concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions from the facility were on average 15% of regulatory limits.
194	22-Jul-26	Email	Public	Public members-at-large	Reduce Strategy/Action	4. A clear plan for timing, staffing and funding of zero waste solutions including: a. Waste prevention b. Reuse and Repair c. Recycling and Composting -enhancing programs to be simple and consistent to ensure clean materials are captured properly. Multifamily, business, institutions, industry and construction locations need to have better programs and services. d. Reducing toxicity - actions to decrease the use of toxic materials as well as the emissions of toxic pollution. e. Enforcing and enhancing existing bans with more inspections, a requirement for clear bags and mandatory source separation.	The draft plan has been revised to expand the plan implementation schedule including estimated start date for each strategy; details on associated deliverables; information on roles and responsibilities
195	25-Jul-26	Email	Public	Public members-at-large	Financial Overview	I am incredibly disappointed by the Draft Solid Waste Management Plan. After years of consultation, this plan still does not include best management practices for achieving zero waste. I participated in the consultation and I do not feel like my concerns were considered. Here are the key problems: The budget does not align with the Zero Waste Hierarchy. If Metro Vancouver is serious about zero waste, then most of the resources should go towards Rethink, Reduce, and Reuse (currently \$5.5 million), not Recover and Dispose (currently \$120 million). The allocation of resources is backwards. If you don't put money into preventing waste, you will continue to be stuck with managing the very expensive disposal infrastructure.	The draft plan was revised to extend financial projections over the 10-year expected plan duration, including estimated allocation of approved budget associated with each strategy
196	25-Jul-26	Email	Public	Public members-at-large	Dispose Strategy/Action	This plan is environmentally unjust (Strategy 6.1). By keeping the incinerator open, people in the vicinity of the incinerator will continue to be exposed to harmful pollutants with long-term health effects. Not only that, there is agricultural land downwind of the incinerator so the pollutants are going into the food that we eat. Current testing and plans to upgrade the incinerator are not enough to ensure full protection of human and environmental health. Either shut down the incinerator or put in the work (and money) to run it properly. If Metro Vancouver is serious about zero waste and takes the appropriate actions to prevent divertable materials from going into the garbage, we wouldn't need an incinerator.	A recent public health risk assessment completed in consultation with health authorities concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions from the facility were on average 15% of regulatory limits.
197	25-Jul-26	Email	Public	Public members-at-large	Recycle Strategy/Action	There is nothing in the plan to improve capacity for in-region organics processing at a substantial scale (Strategy 4.3). There is only one facility in Surrey for organics processing that does not have capacity to service the whole region. Why is Metro Vancouver so obsessed with in-region disposal but not applying the same logic to organics, which is much heavier than all other types of waste and should be hauled as little as possible? Promoting worm/home composting or researching technology options for ICI is not enough. If more people are going to separate organics for composting, we need to process it. There are options at a community scale with decentralized composting. This should be a priority for the SWMP. This plan is unacceptable. I hope it does not get approved by the Minister of Environment and Parks.	Action 4.2.2 is "Support the development of additional local organics processing through leveraging Metro Vancouver procurement processes for organics management." This action is intended to improve capacity for in-region organics processing if required.
198	26-Jul-26	Email	New Westminster Climate Action Hub	Nonprofit organization	General	Would you please consider the input below my signature and from the 52 members of the New Westminster Climate Action Hub? Our mission is to advance solutions that slow global heating and reflect the urgency of the climate crisis through advocacy, education, local initiatives, collaboration with other organizations, and other actions. Since effective waste management often reduces climate pollution, we value the service Metro Vancouver provides in this area and want to see it become more effective in slowing global heating. Overall, we encourage the plan to have a greater focus on reduction of waste rather than recovery. We thank you for this opportunity to be heard.	The plan is based on a zero waste hierarchy that prioritizes waste prevention and reduction, with disposal (including waste-to-energy) as a last resort.

No.	Date	Source/Material	Organization/Group	Sector/Audience	Plan Section	Feedback/Comment	Metro Vancouver Response
199	26-Jul-26	Email	New Westminster Climate Action Hub	Nonprofit organization	Dispose Strategy/Action	1. Phase out the Burnaby incinerator: This waste burner is one of the top 25 point sources of GHGs in the whole province and a key emitter of other pollutants such as dioxins, mercury, cadmium, lead, acid gases and NOx. These pollutants contaminate the air in our city of New Westminster, not just Burnaby. Dioxins have been found in high concentrations on the incinerator roof and nearby rooftops. It is neither cleaner than landfills nor cheaper and is a roadblock to reducing waste. This 38 year old facility is aging and will require significant capital upgrades and maintenance if it is not retired as most incinerators close at 25-30 years. Over \$400 million of capital costs have been forecast in Metro Vancouver budgets, money which would be better spent on investing in zero waste solutions (see #2). Firmly commit to not building or using any new incineration or thermal treatment facilities.	The draft plan was revised to add a comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal. A recent public health risk assessment completed in consultation with health authorities concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions from the facility were on average 15% of regulatory limits.
200	26-Jul-26	Email	New Westminster Climate Action Hub	Nonprofit organization	Reduce Strategy/Action	2. Invest in zero waste solutions: These include redesigning, reducing, repairing, reusing, composting and recycling. Ensure the plan actions are strong such as implement, enact, develop, etc. (rather than just testing, encouraging and piloting). Actions should include: - Waste prevention such as cutting unnecessary packaging and preventing food waste. - Reuse and Repair -making it easier so unusable items do not get thrown out. - Recycling and Composting -enhancing programs to be simple and consistent to ensure clean materials are captured properly. Multifamily, business, institutions, industry and construction locations need to have better programs and services. - Reducing toxicity -include actions to decrease the use of toxic materials as well as the emission of toxic pollution - Enforcing and enhancing existing bans with more inspections, a requirement for clean bags and mandatory source separation	The plan is based on a zero waste hierarchy that prioritizes waste prevention and reduction, with disposal (including waste-to-energy) as a last resort. The draft plan was revised to expand the plan implementation schedule including estimated start date for each strategy, details on associated deliverables, and information on roles and responsibilities. The Plan also now includes estimated allocation of approved budget for each strategy.
201	26-Jul-26	Email	New Westminster Climate Action Hub	Nonprofit organization	Targets/Metrics	3. Measure and work to reduce the climate footprint of materials by including consumption-based emissions on the planning and proposed actions. 4. Set ambitious targets: Thesees need to match those of the Capital Regional District or Regional District of Nanaimo. Targets should be for waste generation reduction and diversion (meaning recycling and composting, not burning of material). Targets should be set for five years (2032) and ten years (2037) and not only in the future but beyond the time frame of the plan. 5. Establish and commit to a timeline for the actions and the associated budget to ensure the plan can be implemented. 6. Pledge to be transparent: report waste performance clearly, especially in 2032 an d2037 (to coincide with targets) so the public can see what is working. Do not call burning of waste recycling or diversion as burning waste creates pollution and ash and should be treated as disposal.	The draft plan was revised to add a new table identifying how elements of the plan contribute to achieving proposed targets by reducing material generation in specific categories, based on existing waste composition information and the strategies and actions in the plan. Ambitious targets in the updated plan reflect feedback from many stakeholders who emphasized the importance of continuing to reduce waste across all sectors. The plan includes several actions designed to support businesses in achieving these targets through collaboration, innovation, and knowledge sharing. Targets were set based on current waste generation statistics and composition data and are meant to be ambitious but achievable. Progress toward targets will be reported annually and shared publicly.
202	26-Jul-26	Email	New Westminster Climate Action Hub	Nonprofit organization	Financial Overview	7. Spend money wisely and invest in the future: choose solutions that reduce waste without locking the region into expensive disposal systems.	The draft plan was revised to add a comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling.
203	26-Jul-26	Email	New Westminster Climate Action Hub	Nonprofit organization	Glossary	8. Use the Zero Waste Hierarchy and definition in the Solid Waste Management Plan. A clear peer-reviewed definition and hierarchy will drive progressive action	The plan is based on a zero waste hierarchy that prioritizes waste prevention and reduction, with disposal (including waste-to-energy) as a last resort.
204	27-Jul-26	Letter to MV and to Provincial Ministry	Waste Management Association of BC	Waste and Recycling Industry	General	We appreciate the effort on the enhanced engagement as was indicated as required by Minister Heyman in 2019 but there are concerns with what this consultation has and has not achieved. - There were numerous comments, suggestions and potential solutions provided through much discussion at the advisory committee level and by WMABC members multiple times but where Metro Vancouver staff had recorded this feedback, very little of it has made its way into the draft SWMP, has not achieved any different outcomes from past draft SWMPs and industry input has not been addressed. The feedback obtained at the Advisory Committees was also minimized in the records. It has become clear that the SWMP outcomes were predetermined. - It was suggested at the Advisory Committee to receive other committee(s) feedback provided for review and potential comments' but this was not provided. A crossover meeting had also been suggested, and it would have been a good opportunity for the different committees to understand what each group's concerns and thoughts were. - The consultation summary has not shown how the public consultations' feedback or the various advisory committees' feedback was used to influence the plan or why each option was or was not pursued.	Metro Vancouver considered all feedback received by documenting responses through feedback logs at each phase, and summarizing feedback in engagement reports. These records are available publicly on the Metro Vancouver website and have been provided to the Zero Waste Committee and GVS&DD Board. All correspondence received related to the solid waste management planning process will be provided to the Minister of Environment and Parks along with the draft plan for consideration.
205	27-Jul-26	Letter to MV and to Provincial Ministry	Waste Management Association of BC	Waste and Recycling Industry	Regulatory Strategic Approach	Referencing the hauler licensing language in potential future regulatory options, we feel we are back to the same argument on this item. Given that we do not know what this licensing language looks like, we are concerned with this language being enshrouded into the plan without having more knowledge the potential language. We believe that this item should be removed altogether from the plan as priority should be on the diversion and incentive programs within the plan, along with alternate solutions to take precedence and allowed to be successful, eliminating the need for hauler licensing. This would increase the stability and confidence of the system for service providers to invest.	The draft plan was revised to add more clarity in the Regulatory Strategic Approach section to describe conditions and the process/engagement for consideration of potential future regulations (including hauler licensing), as well as specifying the approvals required (e.g. several would require provincial approval to be implemented).
206	27-Jul-26	Letter to MV and to Provincial Ministry	Waste Management Association of BC	Waste and Recycling Industry	General	The plan provides a great overview of Metro Vancouver's own system but almost no mention of private sector facilities, existing depots, current capacity and future capacity needs. There is also no mention of what is and isn't working, where does private sector investment fit in, what effects the plan has on private sector investment impacts & opportunities or what the plan is to address these items. Further to this, we have seen the impact the generator levy has had on private sector facilities ability to operate and the 5-year cap on facility licences.	The draft plan was revised to include a section on Competition, Innovation and Affordability, describing the public system's consistent rules and pricing as enabling innovation and competition in the private sector. The new section describes the current integrated system where private companies and non-profit organizations provide collection, drop-off, material processing, and reuse and repair services for garbage, recycling, and construction and demolition materials. Further, Metro Vancouver solid waste facilities are operated by private contractors selected through competitive procurement processes.
207	27-Jul-26	Letter to MV and to Provincial Ministry	Waste Management Association of BC	Waste and Recycling Industry	Financial Overview	With affordability being at the forefront of every conversation at every government level, the plan lacks the planning to reign in spending and tackle affordability for the region's taxpayers. To this we note; - The action timetables and budgets show no commitment to timetables or details. - The capital budget beyond the existing approved Metro Vancouver five-year budget has no detail (\$510 million capital costs added from draft 1 to draft 2 but clarification of the purpose) - The plan will require that Metro Vancouver is approved for capital costs related to projects identified in the plan. The first draft plan had the existing five-year budget (with no provisions for any additional funds to move ahead with these actions) included but there were no details on capital costs and the second draft noted \$900 million in capital costs but without any details. These details need to be provided and consulted on before plan approval, and certainly before any borrowing occurs - The budgeting for the plan was developed and approved without input from the consultation process	The draft plan was revised to extend financial projections over the 10-year expected plan duration; provide comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal; and include estimated allocation of approved budget associated with each strategy. Expanded financial projections show expected tipping fee increase to continue at approximately five per cent per year over the 10 year plan timeline. Waste-to-energy costs are consistent with local landfilling and half of remote landfilling, with estimated waste-to-energy costs continuing to be less expensive than remote disposal over the 10 year plan timeline.

No.	Date	Source/Material	Organization/Group	Sector/Audience	Plan Section	Feedback/Comment	Metro Vancouver Response
208	27-Jul-26	Letter to MV and to Provincial Ministry	Waste Management Association of BC	Waste and Recycling Industry	General	Historical summary - We have previously identified the inherent conflict that exists within GV&DD given its multiple roles as policy developer, regulator and operator. This continues to exist. - We have previously advocated for collaboration with other Regional Districts such as the FVRD, when planning for facilities and capacity. With the limited land space within Metro Vancouver, it only makes sense to plan for potential receiving facilities outside the region and future amendments to the Generator Levy to accommodate this. - We have seen this same plan in different iterations over the years, all with the same outcomes and no real consideration of the private sector contributions to the system within the region. These SWMPs have been rejected by two previous Ministers and we have not seen where there have been any meaningful changes. We do not believe the planning process has met the Ministry guidelines. We sincerely hope this feedback is considered upon the Minister's review and subsequent approval of this draft SWMP. We do not believe this plan should be approved until all concerns have been addressed or rectified.	The draft Solid Waste Management Plan sets out priorities for the continued operation and enhancement of the Metro Vancouver recycling and waste centre network, to improve convenience and access to reuse and recycling opportunities for all residents and businesses in the region. Cost-effectiveness and affordability are key areas of focus. Metro Vancouver's robust regulatory framework and the publicly owned regional solid waste system provides convenient dropoff services and promotes waste reduction. The generator levy helps ensure all waste generators contribute to funding the regional waste system, and encourages the use of regional facilities where recyclable materials are banned from disposal. The stability of the public system has allowed investments in initiatives that support customer service, waste reduction, recycling, and greenhouse gas emission reduction. Metro Vancouver's tipping fees remain comparable to or lower than other major North American jurisdictions. The current solid waste system is highly integrated across sectors, encouraging private sector innovation in circular economy and recycling activities
209	29-Jul-26	Email	Public	Public members-at-large	Dispose Strategy/Action	1. Phase out the Burnaby incinerator: This waste burner is one of the top 25 point sources of GHGs in the whole province and a key emitter of other pollutants such as dioxins, mercury, cadmium, lead, acid gases and NOx. These pollutants contaminate the air in our city of New Westminster, not just Burnaby. Dioxins have been found in high concentrations on the incinerator roof and nearby rooftops. It is neither cleaner than landfills nor cheaper and is a roadblock to reducing waste. This 38 year old facility is aging and will require significant capital upgrades and maintenance if it is not retired as most incinerators close at 25-30 years. Over \$400 million of capital costs have been forecast in Metro Vancouver budgets, money which would be better spent on investing in zero waste solutions (see #2). Firmly commit to not building or using any new incineration or thermal treatment facilities.	The draft plan was revised to add comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal. A recent public health risk assessment completed in consultation with health authorities concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions from the facility were on average 15% of regulatory limits.
210	29-Jul-26	Email	Public	Public members-at-large	Reduce Strategy/Action	2. Invest in zero waste solutions: These include redesigning, reducing, repairing, reusing, composting and recycling. Ensure the plan actions are strong such as implement, enact, develop, etc. (rather than just testing, encouraging and piloting). Actions should include: - Waste prevention such as cutting unnecessary packaging and preventing food waste. - Reuse and Repair -making it easier so unusable items do not get thrown out. - Recycling and Composting -enhancing programs to be simple and consistent to ensure clean materials are captured properly. Multifamily, business, institutions, industry and construction locations need to have better programs and services. - Reducing toxicity -include actions to decrease the use of toxic materials as well as the emission of toxic pollution - Enforcing and enhancing existing bans with more inspections, a requirement for clean bags and mandatory source separation	The plan is based on a zero waste hierarchy that prioritizes waste prevention and reduction, with disposal (including waste-to-energy) as a last resort. The draft plan was revised to expand the plan implementation schedule including estimated start date for each strategy, details on associated deliverables, and information on roles and responsibilities. The Plan also now includes estimated allocation of approved budget for each strategy.
211	29-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	3. Measure and work to reduce the climate footprint of materials by including consumption-based emissions on the planning and proposed actions. 4. Set ambitious targets: Theses need to match those of the Capital Regional District or Regional District of Nanaimo. Targets should be for waste generation reduction and diversion (meaning recycling and composting, not burning of material). Targets should be set for five years (2032) and ten years (2037) and not only in the future but beyond the time frame of the plan. 5. Establish and commit to a timeline for the actions and the associated budget to ensure the plan can be implemented. 6. Pledge to be transparent: report waste performance clearly, especially in 2032 and 2037 (to coincide with targets) so the public can see what is working. Do not call burning of waste recycling or diversion as burning waste creates pollution and ash and should be treated as disposal.	The draft plan was revised to add a new table identifying how elements of the plan contribute to achieving proposed targets by reducing material generation in specific categories, based on existing waste composition information and the strategies and actions in the plan. Ambitious targets in the updated plan reflect feedback from many stakeholders who emphasized the importance of continuing to reduce waste across all sectors. The plan includes several actions designed to support businesses in achieving these targets through collaboration, innovation, and knowledge sharing. Targets were set based on current waste generation statistics and composition data and are meant to be ambitious but achievable. Progress toward targets will be reported annually and shared publicly.
212	29-Jul-26	Email	Public	Public members-at-large	Financial Overview	7. Spend money wisely and invest in the future: choose solutions that reduce waste without locking the region into expensive disposal systems.	The draft Solid Waste Management Plan was revised to add a comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal.
213	29-Jul-26	Email	Public	Public members-at-large	Glossary	8. Use the Zero Waste Hierarchy and definition in the Solid Waste Management Plan. A clear peer-reviewed definition and hierarchy will drive progressive action.	The plan is based on a zero waste hierarchy that prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.
214	29-Jul-26	Email	Public	Public members-at-large	Dispose Strategy/Action	The text below the dashed line is from another e-mail which the write has permitted me to copy and paste. I'm including it because I strongly agree and support what is written there. Although I've done some reading about this issue, I haven't yet read the draft plan or otherwise claim to be really knowledgeable. Nonetheless, from what I have found out so far, the current plan has significant deficiencies. As such, I strongly encourage you to up this for it to act in the best long-term interests of the environment and people of the lower mainland, even if it costs somewhat more, takes longer or otherwise is more difficult to do. It's important to get this done correctly because cleaning up afterwards will invariably involve more time, trouble and cost than it would have taken to just avoid those issues originally! 1. Phase out the Burnaby incinerator: This waste burner is one of the top 25 point sources of GHGs in the whole province and a key emitter of other pollutants such as dioxins, mercury, cadmium, lead, acid gases and NOx. These pollutants contaminate the air in our city of New Westminster, not just Burnaby. Dioxins have been found in high concentrations on the incinerator roof and nearby rooftops. It is neither cleaner than landfills nor cheaper and is a roadblock to reducing waste. This 38 year old facility is aging and will require significant capital upgrades and maintenance if it is not retired as most incinerators close at 25-30 years. Over \$400 million of capital costs have been forecast in Metro Vancouver budgets, money which would be better spent on investing in zero waste solutions (see #2). Firmly commit to not building or using any new incineration or thermal treatment facilities.	Metro Vancouver's Waste-to-Energy facility is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. E
215	29-Jul-26	Email	Public	Public members-at-large	Reduce Strategy/Action	2. Invest in zero waste solutions: These include redesigning, reducing, repairing, reusing, composting and recycling. Ensure the plan actions are strong such as implement, enact, develop, etc. (rather than just testing, encouraging and piloting). Actions should include: - Waste prevention such as cutting unnecessary packaging and preventing food waste. - Reuse and Repair -making it easier so unusable items do not get thrown out. - Recycling and Composting -enhancing programs to be simple and consistent to ensure clean materials are captured properly. Multifamily, business, institutions, industry and construction locations need to have better programs and services. - Reducing toxicity -include actions to decrease the use of toxic materials as well as the emission of toxic pollution - Enforcing and enhancing existing bans with more inspections, a requirement for clean bags and mandatory source separation	The draft plan was revised to expand the plan implementation schedule including estimated allocation of approved budget for each strategy.
216	29-Jul-26	Email	Public	Public members-at-large	Targets/Metrics	3. Measure and work to reduce the climate footprint of materials by including consumption-based emissions on the planning and proposed actions. 4. Set ambitious targets: Theses need to match those of the Capital Regional District or Regional District of Nanaimo. Targets should be for waste generation reduction and diversion (meaning recycling and composting, not burning of material). Targets should be set for five years (2032) and ten years (2037) and not only in the future but beyond the time frame of the plan. 5. Establish and commit to a timeline for the actions and the associated budget to ensure the plan can be implemented. 6. Pledge to be transparent: report waste performance clearly, especially in 2032 and 2037 (to coincide with targets) so the public can see what is working. Do not call burning of waste recycling or diversion as burning waste creates pollution and ash and should be treated as disposal.	The draft plan was revised to add a new table identifying how elements of the plan contribute to achieving proposed targets by reducing material generation in specific categories, based on existing waste composition information and the strategies and actions in the plan. The plan implementation schedule was expanded to add estimated start date for each strategy. Ambitious targets in the updated plan reflect feedback from many stakeholders who emphasized the importance of continuing to reduce waste across all sectors. The plan includes several actions designed to support businesses in achieving these targets through collaboration, innovation, and knowledge sharing. Targets were set based on current waste generation statistics and composition data and are meant to be ambitious but achievable. Progress toward targets will be reported annually and shared publicly.
217	29-Jul-26	Email	Public	Public members-at-large	Financial Overview	7. Spend money wisely and invest in the future: choose solutions that reduce waste without locking the region into expensive disposal systems.	The draft Solid Waste Management Plan was revised to add a comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal.
218	29-Jul-26	Email	Public	Public members-at-large	Glossary	8. Use the Zero Waste Hierarchy and definition in the Solid Waste Management Plan. A clear peer-reviewed definition and hierarchy will drive progressive action.	The plan is based on a zero waste hierarchy that prioritizes reduction and recycling over recovery, with disposal (including waste-to-energy) as a last resort.

No.	Date	Source/Material	Organization/Group	Sector/Audience	Plan Section	Feedback/Comment	Metro Vancouver Response
219	29-Jul-26	Letter	Squamish-Lillooet Regional District	Local government	General	The SLRD has initiated its Solid Waste Management Plan update in 2025 and are currently in the second step of the Plan, which is setting the plan direction. This includes a review of our current systems and developing a list of potential principles, goals and targets. We want to recognize the importance of Metro Vancouver as a real leader in pulling the whole lower mainland forward in terms of solid waste management.	Metro Vancouver's Waste-to-Energy facility is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. E
220	29-Jul-26	Letter	Squamish-Lillooet Regional District	Local government	Financial Overview	Some of our comments/concerns include: - Lack of specificity in the budget for tasks associated with the plan.	The draft plan was revised to extend financial projections over the 10-year expected plan duration; provided comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal; included estimated allocation of approved budget associated with each strategy
221	29-Jul-26	Letter	Squamish-Lillooet Regional District	Local government	Regulatory Strategic Approach	- Need for clearer information about how solid waste moves between regions, including hauler licensing requirements and hauler record-keeping.	The draft plan was revised to add a new action to develop a method to better track and account for construction and demolition waste potentially leaving the region.
222	29-Jul-26	Letter	Squamish-Lillooet Regional District	Local government	Dispose Strategy/Action	- Waste-to-Energy facility - Significant concerns around air quality impacts and dioxins (fish impact). - There is a lot of discussion about the affordability of incineration but no attention to the fact that for years the emissions requirements have not been met. We understand that Metro Vancouver has applied to the Ministry of Environment and Parks for an amendment to the Waste-to-Energy Facility Operational Certificate, requesting an extension to meet the discharge limits for sulphur dioxide and hydrogen chloride. There is a clear contradiction in the affordability of the process if it is too expensive to upgrade the facilities to meet emission requirements. There should not be further delays in upgrading the facility to meet the emissions requirements.	The draft plan was revised to add a comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal. A recent public health risk assessment completed in consultation with health authorities concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions from the facility were on average 15% of regulatory limits. As part of Waste-to-Energy Facility operational certificate requirements, Metro Vancouver conducted a series of technical work including a public health risk assessment in collaboration with health authorities, to support proposing updated emission limits and additional monitoring. Metro Vancouver will conduct engagement prior to submitting final proposed emission limits and additional monitoring for consideration by the Ministry of Environment and Parks. Results of a rooftop monitoring study indicate that particulates accumulating on a warehouse roof near the Waste-to-Energy Facility are not the result of deposition from the facility. Metal, dioxins, and furan concentrations on the warehouse roof, other nearby roofs, in roadside dust and in soils near the Waste-to-Energy Facility are not significantly impacted by emissions from the Waste-to-Energy Facility.
223	30-Jul-26	Letter	Restaurants Canada	Food service	General	Restaurants are subject to various regulatory, reporting and cost obligations driven by policies at all levels of government . For British Columbia 's restaurants : - labour costs have risen by 55 per cent compared to the national average of 45 per cent since 2018 ; - EPR costs have increase d by 43 per cent since 2020 ; and, - liquor licensing fees increased by 30 per cent in 2026. These cost increases, and evolving regulatory requirements place cumulative pressure on restaurants, significantly impacting their operations and viability. At a time when British Columbia is seeking to strengthen the economy, including in tourism and hospitality, we encourage a whole - of-government perspective on the impact policy change s are having on the foodservice sector given its limited ability to absorb more cost and regulatory obligations.	The draft plan was revised to update the secondary metrics under Reduce to include measurement of percent of the region with programs in place for reusables, instead of percentage of the region covered by reusable regulations for dine-in. The plan was also Updated Action 3.1.1 to remove reference to food service ware requirements and replace with phased expansion of access to reusable food service ware. Metro Vancouver will continue to work with interested parties to ensure that affordability, a guiding principle in the draft solid waste management plan, is a continued consideration during implementation.
224	30-Jul-26	Letter	Restaurants Canada	Food service	Reduce Strategy/Action	1. Provide restaurants with flexibility to implement feasible solutions Restaurants Canada recommends that Metro Vancouver prioritize flexible, outcome - based approaches, including: - expanding recycling infrastructure for materials commonly used in foodservice settings; - improving consumer signage and education in public spaces to reduce contamination , aligned with section 2.1.4.1 of The Plan ; - prioritizing phasing - in reuse for event venues where they have already been proven to work ; - encouraging packaging design that improves recyclability and recovery; - supporting end - market development for recovered materials; - maintaining consistency in waste requirements and definitions across municipalities to reduce confusion for businesses and customers ; and, - removing the secondary performance metric : percentage of the region covered by reusable es for dine - in regulations .	The draft plan was revised to update the secondary metrics under Reduce to include measurement of percent of the region with programs in place for reusables, instead of percentage of the region covered by reusable regulations for dine-in. Action 3.1.1 to remove reference to food service ware requirements and replace with phased expansion of access to reusable food service ware. Strategy 4.1 of the plan promotes design for recyclability and the use of recycled content in products and packaging. Strategy 4.2 of the plan encourages the development of new recycling infrastructure. A roles and responsibilities schedule was added to the plan to clarify the extent of collaboration with businesses in the implementation of the plan.
225	30-Jul-26	Letter	Restaurants Canada	Food service	Targets/Metrics	2. Develop evidence - based targets based on real - world operating environments Restaurants Canada recommends that The Plan's diversion targets are developed using baseline data, evidence - based projections, sector - specific implementation tactics and a realistic financial plan. For the commercial and institutional sector, The Plan identifies a diversion target of 65 per cent by 2036 and 75 per cent by 2050, relative to a 2024 baseline of 47 per cent. Restaurants Canada understands the importance of setting ambitious targets; however, those targets must be achievable and connecte d to practical measures that can deliver results. Restaurants Canada recommends that Metro Vancouver strengthen this section of The Plan by identifying: - the baseline data used to assess restaurant and foodservice waste streams (rather than the commercial /institutional sector more broadly); - how the actions outlined in The Plan will contribute to diversion gains in the restaurant sector; - the specific infrastructure, education and investment required to enable those gains; - the role of haulers, processors and end markets in achieving the targets; and - a process for reviewing targets if implementation data shows that assumptions are not realistic.	The draft plan was revised to provide more information on how targets were developed, and which actions and strategies are key to reaching those targets. Metro Vancouver looks forward to working with Restaurants Canada to help obtain better data for the sector. Progress toward targets will be reviewed as part of the annual reporting process.
226	30-Jul-26	Letter	Restaurants Canada	Food service	General	3. Improve recycling infrastructure and incentivize mono - material packaging Strategy 4 in The Plan includes research and advocacy related to the recyclability or phase - out of multi - material products, including coffee cups. Improving recycling outcomes for foodservice packaging is an important objective for Restaurants , but The Plan should avoid assuming that all multi - material products can be quickly or completely phased out before scalable and cost - effective alternatives are available. Restaurants Canada recommends that Metro Vancouver consider positive incentives for businesses that procure packaging aligned with regional recycling infrastructure. For example, where mono - material packaging demonstrates improved recyclability and is accepted in the system, Metro Vancouver could explore whether recognition programs or financial incentives would support broader adoption without penalizing businesses that do not yet have access to viable alternatives.	Metro Vancouver will consider this feedback during plan implementation and looks forward to continued dialogue with Restaurants Canada.

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227	30-Jul-26	Letter	Restaurants Canada	Food service	Reduce Strategy/Action	4. Incorporate the realities of food waste reduction in restaurants into The Plan Reducing food waste is a priority for restaurants, both from a sustainability and an economic perspective. Operators have strong incentives , and often corporate directive s to improve inventory management, reduce prep waste, repurpose ingredients where food safety and quality allow, train staff, and partner with food rescue organizations where feasible. However, food loss and waste in restaurants is nuanced. Back Restaurants Canada recommends that Metro Vancouver engage with the restaurant industry before advocating for or implementing new food waste initiatives. Engagement should be used to identify where operators can have the greatest impact, what barriers prevent better diversion, which practices are already working, and what supports would allow more businesses to participate. Any new initiative should be designed to reduce waste without adding unnecessary operational complexity or cost.	Metro Vancouver looks forward to continued engagement and dialogue with the restaurant industry during plan implementation to ensure that their perspective is heard.
228	30-Jul-26	Letter	RecycleBC	Waste and Recycling Industry	General	Recycle BC appreciates the consideration given to feedback received on the Initial Draft and continues to support the Plan's objectives of increasing recycling, preventing waste, advancing circular economy principles, and improving environmental outcomes across the region. The Final Draft includes several helpful refinements, including clearer recognition that waste prevention and packaging design require coordinated action across sectors and jurisdictions. We also appreciate the revised wording concerning financial incentives for local governments participating in extended producer responsibility (EPR) programs.	Thank you for your feedback and the recognition that we reflected your feedback in the updated plan.
229	30-Jul-26	Letter	RecycleBC	Waste and Recycling Industry	General	EPR Scope and Generator Eligibility The Final Draft continues to propose advocacy for the addition of packaging from sectors such as care homes and schools to EPR programs (3.2.1), as well as the expansion of residential-only packaging drop-off programs to small businesses (3.2.4 c). Recycle BC supports the continued expansion of EPR in principle where it advances waste reduction and recycling objectives. However, under the current Recycling Regulation and Recycle BC's approved Program Plan, the packaging and paper product program is funded by producers to manage materials supplied to residential consumers. It does not include packaging and paper generated by industrial, commercial, or institutional sources. Any expansion to care homes, schools, small businesses, or other non-residential generators would require provincial regulatory direction, a clear assignment of producer obligations, appropriate funding mechanisms, and an assessment of operational implications. These measures would be necessary to maintain cost accountability and ensure that producers funding the residential system do not subsidize the management of materials from non-residential sources. We recommend that the relevant actions in the Plan acknowledge that any expansion beyond residential generators would be subject to corresponding regulatory and funding changes.	Metro Vancouver tried to write the plan to be accessible to all readers. We do recognize that in order to have products added to producer responsibility programs, they would need to be included in an update Recycling Regulation. This action will be implemented with that nuance in mind.
230	30-Jul-26	Letter	RecycleBC	Waste and Recycling Industry	General	Flexible Plastics and Foam The Final Draft continues to advocate for expanded residential collection of flexible plastics and foam and identifies this as a focus area within the Plan (3.2.2). Recycle BC supports this direction and has already taken significant steps to enable broader collection of flexible plastics. Flexible plastics collection from homes has already been introduced in several direct-service communities and Recycle BC's collection agreements provide a pathway for municipal and private multi-family collection partners to implement segregated flexible plastics collection where there is local interest. The collection and processing system has been established to support continued expansion, and we welcome opportunities to work collaboratively with municipal and private hauling partners to onboard additional communities. As Metro Vancouver continues to advocate for expanded flexible plastics collection, we encourage the region to work with its member municipalities to identify communities interested in implementing the service. Recycle BC would welcome the opportunity to collaborate with interested collection partners to support broader adoption over time. With respect to foam packaging, Recycle BC's producer fee structure already reflects the comparatively high cost and complexity of managing this material. These fee signals provide an incentive for producers to reduce, redesign, or transition away from packaging that is more difficult and costly to manage at end of life.	Thank you for your feedback. Metro Vancouver recognizes the great work that RecycleBC has already done in this area and look forward to collaborating with RecycleBC on implementing this action in the plan
231	30-Jul-26	Letter	RecycleBC	Waste and Recycling Industry	General	Financial Incentives and Municipal Participation Recycle BC appreciates the revision to the Final Draft clarifying that Metro Vancouver's advocacy for increased financial incentives relates to programs where local governments are not receiving full cost recovery (3.2.4 b). Recycle BC operates under an approved Program Plan that includes a transparent collection-incentive methodology, supported by regular cost studies and provincial oversight. Appropriate compensation must be assessed through that approved process, including consideration of efficient service standards, reasonable program costs, and the need to maintain fairness and financial sustainability across the province. We recommend that implementation of this action recognize the established provincial framework and approved Program Plan processes used to determine appropriate collection incentives.	Thank you for your feedback, we will consider your response during implementation.
232	30-Jul-26	Letter	RecycleBC	Waste and Recycling Industry	Education and Outreach	Signage, Education, and Service Consistency Recycle BC supports efforts to improve clarity and consistency in recycling collection, signage, and public education. We maintain established signage, communication materials, accepted material guidance, and public education resources designed to support proper sorting and reduce contamination. The Final Draft now commits Metro Vancouver to developing a signage standard and customizable signage tool in collaboration with producer responsibility organizations (4.5.1). Recycle BC welcomes this collaboration and recommends that the initiative begin with a review of existing PRO resources and established provincial messaging. Building on these tools will support consistency while avoiding duplication and unnecessary public confusion. Similarly, efforts to improve service consistency should recognize existing Recycle BC collection agreements, accepted-material lists, service models, and operational requirements (4.4.1).	Thank you for your feedback. Metro Vancouver recognizes the great work that RecycleBC has already done in this area and look forward to collaborating with RecycleBC on implementing this action in the plan.
233	30-Jul-26	Letter	RecycleBC	Waste and Recycling Industry	General	Multi-Family Building Collection Recycle BC shares Metro Vancouver's objective of improving recycling services for residents living in multi-family housing. Under Recycle BC's Program Plan, local governments and First Nations operation programs are eligible to partner with Recycle BC to provide multi-family recycling services within the same service area. In addition, private collection companies operate multi-family recycling services on behalf of Recycle BC in designated service areas. Expanding access to Recycle BC's multi-family program depends not only on service availability, but also on engagement with property owners and managers, who determine how recycling services are procured for their buildings. Metro Vancouver and its member municipalities are well positioned to help raise awareness of these opportunities and facilitate dialogue with the multi-family sector. Recycle BC would welcome opportunities to collaborate in this area to improve participation, strengthen recycling performance, and advance the Plan's objectives of providing more consistent and accessible recycling services.	Thank you for your feedback. Metro Vancouver recognizes the great work that RecycleBC has already done in this area and look forward to collaborating with RecycleBC on implementing multi-family recycling improvements.

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234	30-Jul-26	Letter	RecycleBC	Waste and Recycling Industry	Targets/Metrics	Data Sharing Recycle BC also notes the new action proposing collaboration with producer responsibility organizations to enhance data sharing and transparency (3.2.5). We support continued dialogue on opportunities to improve shared understanding of regional waste prevention and recycling outcomes. Any data-sharing approach should recognize differences between regional and provincial reporting boundaries, material definitions, data availability, confidentiality requirements, and existing reporting obligations. Recycle BC would welcome the opportunity to work with Metro Vancouver to identify information that can be shared meaningfully without creating unnecessary duplication or reporting burden.	Thank you for your feedback. Metro Vancouver recognizes the great work that RecycleBC has already done in this area and look forward to collaborating with RecycleBC on implementing data sharing improvements.
235	30-Jul-26	Meeting	Bowen Island Municipality	Local government	Member Actions	Meeting with staff to discuss their main interests: Geeting greater clarity on how support for local composting and community-scale organics solutions could be delivered in small and ferry-dependent communities. Ensure reuse, repair, deconstruction, and building-material recovery initiatives are designed to be accessible and effective for small and ferry-dependent communities.	Metro Vancouver’s member jurisdictions have an important role to play in accomplishing the goals of the solid waste management plan. While each member has unique goals and priorities reflecting their own community the strategies and actions include opportunities for Metro Vancouver and members to collaborate. Community specific solutions will continue to be discussed at forums such as the regional engineers advisory committee solid waste subcommittee meetings and through direct conversations with staff.
236	31-Jul-26	Email	Envirogreen Technologies Ltd.	Waste and Recycling Industry	Regulatory Strategic Approach	Please see the following notes that I have made as I went through the document specific to the responsible management of contaminated soil and soil with invasives (this is the lens that I used to review the document because of my background and what I do for a living): - Page 7 where it states regulatory – There needs to be an emphasis on the regulatory review of all waste being transferred in the region, including soil and biomass associated with invasives to help reduce the spread. - The plan talks a lot about what is defined by municipal solid waste but little to no talk about soil which I imagine makes up a large percentage by weight and ends up in landfills, displacing airspace required for residents and businesses. - Page 24 where it identifies a number of Organic Processing Facilities and Remote Landfills, it should also mention facilities that can properly manage invasives soil and biomass. Metro Vancouver is the current authority with regards to best management practices for invasives soil in the region by either deep burial (Vancouver Landfill, Delta, BC) or thermal treatment (Envirogreen Technologies Ltd., Princeton, BC Provincial Permit 13075). This section should cover the management of contaminated soil and/or soils impacted by invasives.	Soil is not considered municipal solid waste and is considered outside the scope of the plan . Metro Vancouver revised Strategy 6.4.3 to include invasive species and toxic plants.
237	31-Jul-26	Email	Envirogreen Technologies Ltd.	Waste and Recycling Industry	Targets/Metrics	- Page 69 where it states approximately one million tonnes of garbage require disposal every year – contaminated soil also ends up in either the Vancouver landfill or fill sites across the region. This figure should also be summed up and included in this section.	Strategy 6.4.5 looks at pursuing opportunities for beneficial use of soil at the Vancouver Landfill so as not to displace garbage disposal capacity.
238	31-Jul-26	Email	Envirogreen Technologies Ltd.	Waste and Recycling Industry	Dispose Strategy/Action	- Page 70 it identifies strategies for preserving the Metro Vancouver landfill - contaminated soil may be managed in other ways that are in line with the Metro Vancouver Solid Waste Management Plan 2026 strategies which will reduce the reliance on landfill as a final destination. Finding alternative treatment methods for contaminated soil will also preserve Metro Vancouver airspace for future generations. - Page 71 strategy 6.3 – it identifies that Metro Vancouver’s current waste generation projections, there is sufficient capacity to manage most garbage at the Vancouver Landfill and Waste-to-Energy facility. This section does not take into account the volume of contaminated soil that may require management in the region. - Page 72 strategy 6.4 – I agree, this section is the perfect area to address invasives biomass and contaminated soil to be managed using best management practices (deep burial or destruction by means of thermal treatment). - Page 96 Residuals Management Approach – this section does not cover off clean soil, contaminated soil or soil with invasives which I believe would impact the Vancouver landfill and possibly some of the other facilities mentioned in the – Contingency Disposal section. I also note that Envirogreen is not mentioned here and probably should be as it is a provincially permitted destruction and beneficial reuse facility that converts contaminated soil (including soil with invasives) into beneficial reusable material for land reclamation. This alternative option also ties into the circular economy strategy as well as extending the life of the existing Vancouver landfill.	Soil is not considered municipal solid waste and soil management is considered outside the scope of the plan . Metro Vancouver revised Strategy 6.4.3 to include invasive species and toxic plants. However materials such as soil are important
239	31-Jul-26	Letter to Metro Vancouver and Ministry of Environment and Parks	Waste Connections of Canada	Waste and Recycling Industry	General	CORE POSITION Environmental goals require clear, fair and predictable rules. This submission asks Metro Vancouver to remove or define licensing, address the 2019 Competition Bureau concerns, and demonstrate that the solid waste financial trajectory is sustainable.	The draft plan was revised to add more clarity in the Regulatory Strategic Approach section to describe conditions and the process/engagement for consideration of potential future regulations, as well as specifying the approvals required (e.g. several would require provincial approval to be implemented). In addition, a new section on Competition, Innovation and Affordability was added, describing the public system’s consistent rules and pricing as enabling innovation and competition in the private sector. The new section describes the current integrated system where private companies and non-profit organizations provide collection, drop-off, material processing, and reuse and repair services for garbage, recycling, and construction and demolition materials. Further, Metro Vancouver solid waste facilities are operated by private contractors selected through competitive procurement processes.
240	31-Jul-26	Letter to Metro Vancouver and Ministry of Environment and Parks	Waste Connections of Canada	Waste and Recycling Industry	Financial Overview	In summary, we ask that Metro Vancouver: (d) demonstrate, before the Plan is finalized, that the financial trajectory of the solid waste system is sustainable and has been independently verified. The Plan asks residents and businesses to fund an expanding solid waste system through the user-pay principle, but it does not disclose the financial trajectory that system is already on. Metro Vancouver’s own audited financial statements and successive five-year financial plans show costs rising faster than the substantial tipping fee increases already imposed, persistent operating deficits, and a rapidly growing reliance on borrowing. Solid waste services have run a cumulative deficit against tipping fee revenue of approximately \$81 million over the past eight years, notwithstanding tipping fee revenue increasing by roughly 66% over that period: The 2025 results are particularly striking. Solid waste services cost \$193.3 million against a budget of \$157.2 million – an overrun of approximately \$36 million, or 23%, in a single year. Tipping fee revenue of \$169.8 million also came in well above the \$148.9 million budgeted, yet the service still recorded a deficit. The forward plan compounds the problem. Metro Vancouver’s 2025 five-year financial plan projects new external borrowing of approximately \$295 million between 2025 and 2029, with annual debt service tripling over the same period: Two features of this trajectory warrant particular attention. - Debt service is becoming a structural cost of the system. Solid waste debt service was approximately \$1.0 million in 2018. By 2029 it is budgeted at \$40.1 million – nearly one in every five dollars of the solid waste budget. Every dollar of that is recovered from generators through tipping fees and the generator levy. - The borrowing requirement keeps growing with each budget cycle. The 2019 financial plan projected new borrowing tapering to \$3.25 million by 2023. The 2025 financial plan instead projects \$60–\$80 million of new borrowing annually by 2028–2029. The trend is not toward the retirement of debt but toward its expansion. REQUIRED BEFORE FINALIZATION Publish the full cost path Provide an independently developed cost-of-service analysis, the generator levy basis, the causes of the 2025 overrun, the capital program behind \$295 million of borrowing, and the expected tipping fee trajectory.	The draft plan was revised to extend financial projections over the 10-year expected plan duration; provided comparison of disposal costs over 10 years for Vancouver Landfill, Waste-to-Energy, and contingency disposal; included estimated allocation of approved budget associated with each strategy. The expanded financial projections show expected tipping fee increase to continue at approximately five per cent per year over the 10 year expected plan timeline. Waste-to-energy costs are consistent with local landfilling and half of remote landfilling, with estimated waste-to-energy costs continuing to be less expensive than remote disposal over the 10-year plan timeline. Metro Vancouver’s solid waste system is funded by tipping fees, while systems in other comparable jurisdictions are often funded through a combination of tipping fees and property taxes. The generator levy, in place since 2018, helps ensure all waste generators contribute to funding the regional solid waste system, and also encourages the use of regional facilities where recyclable materials are banned from disposal. Metro Vancouver’s tipping fees are comparable to or lower than other major North American jurisdictions.

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241	31-Jul-26	Letter to Metro Vancouver and Ministry of Environment and Parks	Waste Connections of Canada	Waste and Recycling Industry	General	(b) place competition and innovation as elements of the foundations of a waste management plan with attainable goals and a plan for achieving those goals; and Metro Vancouver's Draft summary of ideas staff consider unadvisable addresses proposals for private sector investment in the region's solid waste system. The rationale offered for setting those ideas aside is not, in our reading, grounded in any practical assessment – there is no analysis of cost, capacity, deliverability, environmental performance, or risk. It reflects instead a policy preference for public ownership and delivery. EVIDENCE STANDARD Test private investment on its merits Evaluate cost, capacity, deliverability, environmental performance and risk before excluding private participation. A policy preference should not be presented as a technical finding.	The draft plan was revised to include a section on Competition, Innovation and Affordability, describing the public system's consistent rules and pricing as enabling innovation and competition in the private sector. The new section describes the current integrated system where private companies and non-profit organizations provide collection, drop-off, material processing, and reuse and repair services for garbage, recycling, and construction and demolition materials. Further, Metro Vancouver solid waste facilities are operated by private contractors selected through competitive procurement processes.
242	31-Jul-26	Letter to Metro Vancouver and Ministry of Environment and Parks	Waste Connections of Canada	Waste and Recycling Industry	General	(c) address, on the record and in the Plan, the competition and cost concerns previously identified by the Competition Bureau and the Minister of Environment On May 3, 2019, the Deputy Commissioner of Competition wrote to the Minister of Environment and Climate Change Strategy under section 126 of the Competition Act, providing the Bureau's views on Bylaw 307 (Commercial Waste Licensing), Bylaw 308 (Generator Levy) and Bylaw 309. The Bureau's conclusions were unambiguous: - The bylaws could have significant negative effects on competition for the handling, transfer and recovery of mixed municipal solid waste in the region. - The Generator Levy effectively raises the costs of competing non-Metro Vancouver facilities, and the Bureau concluded that the licensing bylaw coupled with the levy would likely result in a monopoly on waste management in the Metro Vancouver area. - Reduced competition would mean reduced choice and less innovation, including deterring private investment in technologies (such as mixed material recovery facilities) that would improve, not harm, the region's diversion rates. - Reduced competition would permit Metro Vancouver to raise tipping fees without competitive constraint – a concern the Bureau supported by pointing to Metro Vancouver's own conduct, having lowered large-load tipping fees in 2015 when it faced competition, then planning steep increases once the levy was in place. - The quantum of the Generator Levy does not reflect the actual fixed costs of Metro Vancouver's transfer stations, and appears to significantly exceed fixed costs in any reasonable accounting sense. COMPETITION BUREAU FINDING The licensing bylaw plus the generator levy would likely result in a monopoly. The Bureau also warned of reduced choice and innovation, deterrence of private investment and the ability to raise tipping fees without competitive constraint. STRUCTURAL CONFLICT The same institution can set rules and prices, adjudicate its own bylaws, and compete for the same material. Likely effects include weaker investment incentives, reduced choice and innovation, and higher cost risk.	Metro Vancouver encourages private sector solutions to advance waste reduction and recycling in the region. However, Metro Vancouver remains adaptable and flexible to consider expanding services where there is a clear need, such as: - Market disruptions, gaps, or failures resulting in insufficient or inadequate private sector services, particularly for member jurisdictions - Changes to extended producer responsibility regulations affecting private sector services - Supply chain impacts - Cost-saving opportunities through co-location of services at Metro Vancouver facilities
243	31-Jul-26	Letter to Metro Vancouver and Ministry of Environment and Parks	Waste Connections of Canada	Waste and Recycling Industry	General	(a) remove references to hauler licensing and restrict options for future actions that could increase regulatory burden and cause economic hardship on local residents and businesses; Undefined and open-ended hauler licensing, facility definitions, and fines The Plan's Regulatory Strategic Approach lists, as "example" future regulations, hauler licensing "including mandatory source separation and separate management of streams," "expanded types of facilities that require a licence," and "administrative improvements to licensing bylaw including updating definitions." These are presented without definition, scope, or limiting principle. 4.1 The concern: a hauler's yard could be captured as a "facility" Read together, these three items create a real risk that the ordinary operations of a hauler – in particular a truck yard, depot, or transfer point – could be brought within facility licensing under GV5&DD Bylaw 181: - The Plan expressly contemplates expanding the types of facilities that require a licence and updating the definitions in the licensing bylaw. It does not say where the new boundary lies. - The Plan grounds licensing authority in Environmental Management Act s 25, which allows Metro Vancouver to require a licence from the operator of "a site that accepts and manages municipal solid waste." On its face, that wording is broad enough to reach a yard where waste sits in trucks overnight. - Nothing in the Plan carves out hauler yards, parking or maintenance depots from the definition of a "facility." SCOPE REMAINS UNDEFINED "Whatever the thing is" At the June 9, 2026 meeting, staff confirmed that no hauler licensing program was under development and said its content would be determined through a future engagement process.	The draft plan was revised to provide more clarity in the Regulatory Strategic Approach to clarify that new facility types would only encompass facilities processing municipal solid waste. Locations where mobile equipment containing municipal solid waste is parked or stored would not be included in any new licensing requirements. This Solid Waste Management Plan lists the generator levy as an existing component of the GV5&DD Tipping Fee and Solid Waste Disposal Regulation Bylaw No. 379, 2024, as amended. This Solid Waste Management Plan also notes hauler licensing and other regulatory mechanisms as potential future regulatory enhancements; this Regulatory Strategic Approach section was revised to add more clarity to describe conditions and the process/engagement for consideration of potential future regulations, as well as specifying the approvals required (e.g. several would require provincial approval to be implemented). Consideration of a mechanism such as hauler licensing would require further, separate engagement and provincial approval apart from the approval of this Solid Waste Management Plan.
244	31-Jul-26	Letter to Metro Vancouver and Ministry of Environment and Parks	Waste Connections of Canada	Waste and Recycling Industry	General	The enforcement regime attached to licensing is already significant: penalties of up to \$500 per contravention, chargeable for each day an offence continues, together with suspension or cancellation of a licence. The draft newly adds "administrative monetary penalties to address non-compliances." None of these are quantified, scoped, or accompanied by a proportionality framework, cure periods, or an independent appeal. For a licence a hauler depends on to operate, cancellation is an existential penalty that should not rest on undefined standards. PENALTY EXPOSURE Undefined standards can carry existential consequences The existing regime allows penalties of up to \$500 per contravention for each day, plus licence suspension or cancellation. The Draft Plan adds administrative monetary penalties without scope, cure periods or an independent appeal.	Administrative monetary penalties have been removed from the draft plan.
245	31-Jul-26	Letter to Metro Vancouver and Ministry of Environment and Parks	Waste Connections of Canada	Waste and Recycling Industry	General	Hauler licensing and the generator levy have historically been justified as tools to prevent garbage from leaving the regional system. METRO VANCOUVER'S OWN EVIDENCE No demonstrated waste-leakage problem. Every tracking device deployed under the smart-waste program ended at Metro Vancouver or City of Vancouver facilities; staff reported no concerns that garbage was going elsewhere, and targeted tracking has never been invoked against a company.	The draft plan was revised to add more clarity in the Regulatory Strategic Approach section to describe conditions and the process/engagement for consideration of potential future regulations.

No.	Date	Source/Material	Organization/Group	Sector/Audience	Plan Section	Feedback/Comment	Metro Vancouver Response
246	31-Jul-26	Letter to Metro Vancouver and Ministry of Environment and Parks	Waste Connections of Canada	Waste and Recycling Industry	General	On July 25, 2019, Minister Heyman declined to approve Bylaws 307 and 309 at that time. He confirmed that he had received the Competition Bureau's report. He concluded that initiatives which may result in a significant change to the waste management regulatory system "would be best considered as part of a robust solid waste management planning process," and found that the consultation conducted for the existing plan "did not fully contemplate the details and extent of the regulatory changes" proposed by the bylaws, or their impact. He therefore delayed his decision expressly to give Metro Vancouver time to renew the plan and to align the plan and the bylaws. This Plan is the renewal the Minister called for. It is the "robust solid waste management planning process" through which hauler licensing was supposed to be properly examined and consulted upon. Yet in this Plan: - There is no reference to the Competition Bureau's letter, and no response to its central finding that this regulatory package would likely create a monopoly. - There is no competitive impact analysis of any kind. - There is no cost-of-service justification for the generator levy, notwithstanding the Bureau's finding that the levy exceeds any reasonable measure of fixed costs. - There is no consideration of the less restrictive alternatives the Bureau identified. - The topic of Hauler licensing and the expansion of facilities licensing were never addressed at the Industry Advisory Committee, which was intended to be a robust opportunity for industry consultation in the development of the SWMP. This is confirmed by Metro Vancouver's own record: the feedback summary attached to the January 28, 2026 committee minutes states that "Haulers have been requesting a draft licensing template for years, yet the topic was never raised in Industry Advisory Committee meetings." The committee's meeting record is summarized in Appendix A. The consultation record itself is this. Across four and a half years, the committee meetings with published minutes total roughly 24 hours of committee time, averaging approximately 85 minutes against a two-hour booking; the two meetings immediately preceding the options-analysis phase (February 4 and March 4, 2025) lasted 31 and 50 minutes respectively; and the January 28, 2026 meeting at which staff walked the committee through the initial draft plan proceeded without quorum (see Appendix A). - Hauler licensing itself appears as a single line in a table of "examples," with no scope, no detail, and no impact assessment – which is the opposite of the detailed consideration the Minister said was missing. The Plan elevates "prioritize local solutions" to a strategic principle and commits to "optimize" the Vancouver Landfill and Waste-to-Energy Facility to "reduce reliance on remote disposal." Framed as environmental and cost stewardship, in practice "local" functions largely as "Metro Vancouver-owned or controlled," and the tools used to advance it reduce the ability of private operators to compete. A public body should not use its regulatory powers to foreclose competition with its own facilities under the banner of environmental benefit. COMPETITIVE NEUTRALITY "Local" should not function as "Metro Vancouver-owned or controlled." Any levy or restriction that disadvantages private or remote disposal should be supported by a transparent cost-of-service basis and periodic independent review.	The draft plan was revised to include a section on Competition, Innovation and Affordability. Metro Vancouver's robust regulatory framework and the publicly owned regional solid waste system provides convenient dropoff services and promotes waste reduction. The generator levy helps ensure all waste generators contribute to funding the regional waste system, and encourages the use of regional facilities where recyclable materials are banned from disposal. The stability of the public system has allowed investments in initiatives that support customer service, waste reduction, recycling, and greenhouse gas emission reduction. The current solid waste system is highly integrated across sectors, encouraging private sector innovation in circular economy and recycling activities. Metro Vancouver's tipping fees remain comparable to or lower than other major North American jurisdictions. The draft Solid Waste Management Plan sets out priorities for the continued operation and enhancement of the Metro Vancouver recycling and waste centre network, to improve convenience and access to reuse and recycling opportunities for all residents and businesses in the region. Cost-effectiveness and affordability are key areas of focus.
247	31-Jul-26	Letter to Metro Vancouver and Ministry of Environment and Parks	Waste Connections of Canada	Waste and Recycling Industry	Financial Overview	Cost to residents and businesses in a high cost-of-living region The regulatory measures contemplated – hauler licensing, mandatory separate stream management, additional disposal bans and surcharges, expanded reporting, and an eventual shift to zero-emission collection fleets – all carry real compliance costs that will be passed on in collection rates. - Separate management of streams typically requires additional trucks, routes, and trips – a direct, recurring operating cost, felt most in the multi-family and commercial sectors the Plan targets for the steepest diversion increases. - Licence fees, reporting systems, and penalty exposure add fixed administrative costs that fall hardest on smaller operators and, ultimately, on their customers. - Fleet electrification is a major capital cost that, if mandated or effectively required, will be reflected in rates. The Plan's own "Considerations" acknowledge that regulations may change tipping fees and impose "other costs borne by residents, businesses," yet the document contains no costing, no rate-impact analysis, and no cost-benefit assessment for any of the contemplated measures. Stakeholders and the public are being asked to endorse a direction with unquantified household and business cost implications. The consultation being offered may not apply to the actual rules The Plan's amendment provisions state that introducing the regulatory initiatives contemplated in the Regulatory Strategic Approach does not require a plan amendment, and neither does establishing or changing a Bylaw 181 facility. The effect is that hauler licensing, expanded facility definitions, new penalties, and additional disposal bans could all be enacted later without the plan-level public process – on the strength of this Plan's blanket pre-authorization. When pressed at the June 9, 2026 committee meeting, staff's answer was that any future hauler licensing proposal would be accompanied by "an extensive engagement program." That commitment appears nowhere in the Plan, and the Plan's amendment provisions are expressly to the contrary. Duplication with existing regulators Haulers are already regulated by municipal business licensing, provincial commercial-vehicle and safety regimes, and the Environmental Management Act. A new Metro Vancouver hauler-licensing layer risks duplication, inconsistency, and conflicting requirements. The Plan's Considerations ask whether a measure conflicts with other regulation, but the Plan provides no answer and no coordination commitment.	Any proposed new regulatory measures will be accompanied by a transparent and meaningful engagement process. Engagement will follow Metro Vancouver's Public Engagement Board Policy and Public Engagement Guide. Metro Vancouver will also comply with any provincial requirements related to public consultation. The plan was revised to add more clarity in the Regulatory Strategic Approach section to describe conditions and the process/engagement for consideration of potential future regulations, as well as specifying the approvals required (e.g. several would require provincial approval to be implemented).
248	31-Jul-26	Letter to Metro Vancouver and Ministry of Environment and Parks	Waste Connections of Canada	Waste and Recycling Industry	General	Due process and competitive neutrality Penalties and licence suspension or cancellation are adjudicated through Metro Vancouver's own bylaw dispute process. Natural justice favours an independent adjudicator where the regulator is also an interested competitor. Relatedly, the Plan makes no commitment that Metro Vancouver's own facilities will be held to the same diversion, reporting, and penalty standards it would impose on private facilities and haulers.	The draft Solid Waste Management Plan includes a dispute resolution process in alignment with the <i>BC Guide to Solid Waste Management Planning</i>. The draft plan commits to annual reporting on solid waste statistics and plan progress.
249	31-Jul-26	Letter to Metro Vancouver and Ministry of Environment and Parks	Waste Connections of Canada	Waste and Recycling Industry	Regulatory Strategic Approach	Recommendations FAIR COMPETITION RECOMMENDATIONS 1, 2, 3, 7, 9 Defined scope, competitive impact analysis, neutral standards and evidence-based private participation 1. Remove hauler licensing from the Plan. Delete the references to hauler licensing, expanded facility licensing categories, and updated licensing definitions. If Metro Vancouver wishes to pursue these measures, they should be brought forward as a distinct proposal with a defined scope, a published impact assessment, and a dedicated consultation – as the Minister directed in 2019. 2. At minimum, define the scope now. If the references are retained, expressly state that hauler truck yards, parking, and maintenance depots are not "facilities" for licensing purposes, and define "facility" by function (receiving or processing third-party waste for a fee) rather than by the presence of vehicles or containers. 3. Address the Competition Bureau's findings on the record. Include in the Plan an express response to the Bureau's May 2019 letter, a competitive impact assessment of the regulatory measures contemplated, and an assessment of the less restrictive alternatives the Bureau identified. 7. Competitive neutrality. Commit that Metro Vancouver-owned facilities will meet the same diversion, reporting, and penalty standards imposed on the private sector, and establish arm's-length separation between Metro Vancouver's regulatory function and its operational and commercial functions. 9. Evidence-based evaluation of private sector participation. Require that any recommendation to exclude private investment be supported by a documented assessment against stated criteria, and be made public.	The Regulatory Strategic Approach section was revised to specify that "Locations where mobile equipment or vehicles temporarily containing municipal solid waste are parked or stored would not be included in any new licensing requirements"
250	31-Jul-26	Letter to Metro Vancouver and Ministry of Environment and Parks	Waste Connections of Canada	Waste and Recycling Industry	Financial Overview	Recommendations FINANCIAL DISCIPLINE RECOMMENDATIONS 4, 5 Cost-of-service support for the levy and a transparent, independently tested financial trajectory 4. Publish a cost-of-service justification for the generator levy, demonstrating that its quantum is commensurate with the fixed costs it is said to recover, and commit to periodic independent review. 5. Publish the financial trajectory. Disclose an independently developed cost-of-service analysis, capital program, borrowing requirement, and projected tipping fee path for the term of the Plan, so that residents and businesses can see what the Plan will cost them.	Plan has been revised to include a section on competition, innovation, affordability. Plan has been revised to extend the financial and capital outlook and tipping fee projections over the expected duration of the plan. Expanded financial projections show expected tipping fee increases to continue at approximately five per cent per year over the 10-year plan timeline.

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251	31-Jul-26	Letter to Metro Vancouver and Ministry of Environment and Parks	Waste Connections of Canada	Waste and Recycling Industry	General	Recommendations DUE PROCESS RECOMMENDATIONS 6, 8 Plan-level approval for major regulatory changes, proportionate penalties and independent appeal 6. Close the amendment loophole. Provide that hauler licensing, expanded facility definitions, and new penalty regimes require a Plan amendment, with the associated public process. 8. Proportionate, independent enforcement. Adopt a published, proportionate penalty framework with cure periods, and provide an independent appeal for penalties, suspension, and cancellation.	Revised to align with the approach in the provincial, "A Guide to Solid Waste Management Planning". Added more clarity in the Regulatory Strategic Approach section to describe conditions and the process/engagement for consideration of potential future regulations.
252	31-Jul-26	Letter to Metro Vancouver and Ministry of Environment and Parks	Waste Connections of Canada	Waste and Recycling Industry	General	Recommendations DATA PROTECTION RECOMMENDATIONS 10 Strong confidentiality safeguards and aggregated public reporting 10. Protect commercial data. Provide strong confidentiality protection for industry-supplied data and publish only in aggregated form. Commercially sensitive data Expanded reporting obligations could require haulers to disclose route, customer, tonnage, and destination data to a body that also competes with them. This raises a legitimate competitive-information concern.	Metro Vancouver only publishes solid waste and recycling statistics provided by private facilities in aggregated form. The draft plan does not contain any expanded reporting obligations.
253	31-Jul-26	Letter to Metro Vancouver and Ministry of Environment and Parks	Waste Connections of Canada	Waste and Recycling Industry	General	Metro Vancouver has presented the Solid Waste and Recycling Industry Advisory Committee as its principal forum for industry consultation on the solid waste management plan update. The committee's own published minutes show two things: the volume of consultation was modest, and the concerns raised in this submission were put to Metro Vancouver repeatedly, on the record, throughout the plan's development, without being carried into the Plan. The regulator-competitor conflict and the demand for a defined hauler-licensing proposal were raised at the Industry Advisory Committee in 2022, 2023, 2024, and 2026 – at every stage of the plan's development. The Final Draft nonetheless contains no competitive impact analysis and no definition of the scope of hauler licensing. The concerns were recorded; they were not answered. In addition, the January 28, 2026 meeting at which staff walked the committee through the initial draft plan proceeded without quorum, and the April 4, 2023 workshop was adjourned without conducting any business over unresolved conflict-of-interest process. This is the consultation record on which Metro Vancouver will ask the Minister to conclude that the 2019 direction – that changes of this magnitude be considered through "a robust solid waste management planning process" – has been satisfied.	Metro Vancouver considered all feedback received by documenting responses through feedback logs at each phase, and summarizing feedback in engagement reports. These records are available publicly on the Metro Vancouver website and have been provided to the Zero Waste Committee and GVS&DD Board. All correspondence received related to the solid waste management planning process will be provided to the Minister of Environment and Parks along with the draft plan for consideration.
254	31-Jul-26	Letter	Public	Public members-at-large	General	I made a submission previously and am writing again to underscore my position regarding the Metro Vancouver Incinerator. It is my view that Metro Vancouver should immediately prepare to permanently shut down the Metro Vancouver incinerator in Burnaby. Zero Waste BC is proposing you set a closure date of 2028 because it will take some time and effort to responsibly phase out the incinerator. I also note that if the incinerator is not closed in 2028, it will require Metro Vancouver to spend more money on this aging infrastructure.	A recent public health risk assessment completed in consultation with health authorities concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions from the facility were on average 15% of regulatory limits. As part of Waste-to-Energy Facility operational certificate requirements, Metro Vancouver conducted a series of technical work including a public health risk assessment in collaboration with health authorities, to support proposing updated emission limits and additional monitoring. Metro Vancouver will conduct engagement prior to submitting final proposed emission limits and additional monitoring for consideration by the Ministry of Environment and Parks. Results of a rooftop monitoring study indicate that particulates accumulating on a warehouse roof near the Waste-to-Energy Facility are not the result of deposition from the facility. Metal, dioxins, and furan concentrations on the warehouse roof, other nearby roofs, in roadside dust and in soils near the Waste-to-Energy Facility are not significantly impacted by emissions from the Waste-to-Energy Facility.
255	31-Jul-26	Letter	Public	Public members-at-large	Dispose Strategy/Action	I agree with the recommendations of the Zero Waste Committee that Metro Vancouver should invest real dollars to decrease waste (i.e. acting on all of the good suggestions you received during this planning process) and, in the interim, use external landfills. The Zero Waste Committee's financial analysis can be seen here: https://www.zerowastebc.ca/wp-content/uploads/2025/10/Metro-Vancouver-Residuals-financial-analysis-ZWC-Oct-9th-2025-summary.pdf	Metro Vancouver assumes that this feedback is referring to Zero Waste BC recommendations and not the Metro Vancouver Zero Waste Committee. Extended financial projections over the 10-year expected plan duration, including estimated cost associated with each strategy.
256	31-Jul-26	Letter	Public	Public members-at-large	Reduce Strategy/Action	Metro Vancouver has acknowledged that 80% of Metro Vancouver's waste could be avoided, recycled or composted and I urge Metro Vancouver to pursue these goals. You could, for example: - follow Nanaimo's example and mandate three stream collection with support for businesses and institutions to make changes - work to ensure that buildings are deconstructed - provide support (coaching, education, building ambassadors) to have better diversion in multi-family buildings - use your procurement processes to support waste reduction (like Richmond is doing) - mandate dine in reuse (like Victoria) - take many, many more actions - including those recommended by the three working groups of the Public Technical Advisory committee (see presentations)	Thank you for your suggestions. Deconstruction, educational support, circular procurement, supporting reusables and many additional actions to support rethinking, reducing, reusing and recycling are included in the draft plan.
257	31-Jul-26	Letter	Public	Public members-at-large	Circular Economy	Technology that supports "sharing systems, tracking of reusables, data on material flows, assistance in sorting recyclables, working towards better outcomes of procurement, design of products that results in less waste (for example some wood cutting devices that maximizes the use of the wood), devices that spots and removes nails from recovered wood.	The draft plan includes exploring technology solutions to help improve assistance in sorting recyclables in addition to supporting the scaling of reuse systems and advocating for the design of products that result in less waste.
258	31-Jul-26	Letter	Public	Public members-at-large	Education and Outreach	For the waste trucks, there is also increased use of cameras to spot contamination (clear bags help for that), automatic education postcards sent to those who have mistakes, on trucks scales to provide weights and feedback to customers. So lots of positive options as well.	Exploring clear bag technology to enhance disposal ban inspection efficacy is considered as Action 4.8.1 in the draft plan.

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259	31-Jul-26	Letter	Public	Public members-at-large	General	I submit that it does not work to say that "some day" the incinerator will need to be closed down. If you accept a "some day" closure date, by then, Burnaby will have introduced a district energy facility to use steam generated by heat from the incinerator to heat buildings in a large area of Burnaby, making Burnaby dependent on a continuous supply of garbage - clearly counter to the plan to reduce garbage. Furthermore, significant amounts of dioxin have been found on the incinerator roof indicating that the incinerator may be generating unacceptable levels of air pollution. It is my strongly held view that Metro Vancouver needs to immediately plan the shutdown of the incinerator. A new contract would need to be negotiated to send the waste to another landfill while Metro Vancouver puts genuine effort into reducing waste. The incinerator should be closed properly with deconstruction and full site clean-up. (In theory, the incinerator could be closed tomorrow but it would be smoother if its shut-down were planned.)	recent public health risk assessment completed in consultation with health authorities concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions from the facility were on average 15% of regulatory limits. As part of Waste-to-Energy Facility operational certificate requirements, Metro Vancouver conducted a series of technical work including a public health risk assessment in collaboration with health authorities, to support proposing updated emission limits and additional monitoring. Metro Vancouver will conduct engagement prior to submitting final proposed emission limits and additional monitoring for consideration by the Ministry of Environment and Parks. Results of a rooftop monitoring study indicate that particulates accumulating on a warehouse roof near the Waste-to-Energy Facility are not the result of deposition from the facility. Metal, dioxins, and furan concentrations on the warehouse roof, other nearby roofs, in roadside dust and in soils near the Waste-to-Energy Facility are not significantly impacted by emissions from the Waste-to-Energy Facility.
260	31-Jul-26	Letter	Public	Public members-at-large	General	While technology has a useful role to play in the reduction of waste higher up the Zero Waste Hierarchy as described above, there is no technology that can make burning garbage a sustainable way to create energy. Lastly, I believe the City of Burnaby has supported the notion of revamping the Metro Vancouver incinerator to create energy to heat buildings in Burnaby. I believe the City is looking for a quick way to reduce greenhouse gas emissions and meet its climate action goals. In my view, perpetuating the incinerator is not the way.	Recent public health risk assessment completed in consultation with health authorities concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions from the facility were on average 15% of regulatory limits. As part of Waste-to-Energy Facility operational certificate requirements, Metro Vancouver conducted a series of technical work including a public health risk assessment in collaboration with health authorities, to support proposing updated emission limits and additional monitoring. Metro Vancouver will conduct engagement prior to submitting final proposed emission limits and additional monitoring for consideration by the Ministry of Environment and Parks. Results of a rooftop monitoring study indicate that particulates accumulating on a warehouse roof near the Waste-to-Energy Facility are not the result of deposition from the facility. Metal, dioxins, and furan concentrations on the warehouse roof, other nearby roofs, in roadside dust and in soils near the Waste-to-Energy Facility are not significantly impacted by emissions from the Waste-to-Energy Facility.
261	31-Jul-26	Letter and public statement	Business Council of British Columbia	Business	General	The SWMP 2026's stated purpose is to shift the region away from an end-of-pipe waste management model toward a circular economy. While reducing waste is a worthy objective, we believe the plan should be guided by a broader set of principles, including reliability, affordability, transparency, and preserving competition. Beyond our concern that the Plan's objectives need to be expanded, we are highly concerned that this plan: - Fails to resolve documented anti-competitive concerns flagged by the federal Competition Bureau and the provincial Ministry of Environment in 2019. - Locks the region into an unsustainable financial trajectory that places escalating capital and operating costs onto residents and businesses. - Entrenches a structural governance conflict that restricts market access and stifles private-sector innovation.	The guiding principles of the plan include "a solid waste system that is affordable, convenient and consistent across the region". This principle was considered during the all stages of the plan development and will guide implementation of the plan. Metro Vancouver received and considered similar feedback suggesting that Metro Vancouver increase privatization of the regional solid waste system. This feedback was documented and responded to during the option analysis phase. "Metro Vancouver provides convenient drop-off for small loads of recyclables, and disposal of garbage for all residents and businesses in the region. This system provides reliable and resilient waste and recycling services that benefit and are available to all residents and businesses who generate waste in the region. It also allows Metro Vancouver to implement the disposal ban program at its facilities which encourages recycling rather than disposal of many recyclable materials. Recycling sorting and processing facilities, and most commercial recyclables collection and drop off are managed by the private sector. An integrated system allows and encourages private sector innovation in recycling." The document is publicly available on the Metro Vancouver website under Option Analysis Resource through the document title: Draft Summary of Ideas Staff Consider Unadvisable which is available here: https://metrovancover.org/services/solid-waste/Documents/draft-summary-of-ideas-staff-consider-unadvisable.pdf.
262	31-Jul-26	Letter and public statement	Business Council of British Columbia	Business	General	Given these concerns, our main recommendation to Metro Vancouver is to suspend finalization of its Plan until it reconsiders the objectives and unintended consequences, such as reduced competition and rising costs. Furthermore, because Metro Vancouver's governance system concentrates planning, regulation, ownership, financing, and market control within one institution, we are also calling for an independent, third-party review. The review should consider the factors identified by the Competition Bureau in 2019 and explicitly evaluate reliability, affordability, transparency, and competition, along with waste reduction goals.	During the October 3, 2025 Public Technical Advisory Committee meeting staff heard clear concerns from the committee about the risks of reduced accountability and oversight. Committee members stated they feel it is important to maintain public system accountability and ensuring that resources are directed toward reduction, reuse, and recycling first. The notes capturing this feedback are publicly available on the Metro Vancouver website.
263	31-Jul-26	Letter and public statement	Business Council of British Columbia	Business	General	Failure to Address Federal and Provincial Directives In 2019, the Competition Bureau of Canada warned that Metro Vancouver's Commercial Waste Licensing Bylaw 307, Generator Levy Bylaw 308, and Solid Waste and Recyclable Material Regulatory Bylaw 309 would likely result in a monopoly on waste management in the region, while also reducing choice and innovation and raising tipping fees. That same year, the BC Minister of Environment declined to approve Bylaws 307 and 309, stating in a letter dated July 25, 2019, that regulatory changes of this magnitude should be properly considered through a renewed solid waste management planning process, delaying a final decision on the bylaws. The SWMP 2026 represents this opportunity for thoughtful and thorough consideration of the issues raised by the Competition Bureau, yet it contains: - No reference to the Competition Bureau's letter, and no response to its central finding that the current approach creates a strong direction towards a monopoly on waste management in Metro Vancouver. - No competitive impact analysis of any kind. - No cost-of-service justification for a 5% per year increase in the generator levy under Bylaw 308, notwithstanding the Bureau's finding that the levy exceeds any reasonable measure of fixed costs. - No consideration of the less restrictive alternatives the Bureau identified, such as incentives for private waste management companies to contribute to Plan objectives, instead of creating solutions that structurally favour Metro Vancouver facilities. BCBC recommends the following: - Address the concerns the federal Competition Bureau raised in 2019, including a public accounting of what steps have been taken in response. - Reframe the Plan's objective to explicitly include reliability, affordability, transparency, and preserving competition as guiding principles.	The draft plan was revised to include a section on Competition, Innovation and Affordability, describing the public system's consistent rules and pricing as enabling innovation and competition in the private sector. The new section describes the current integrated system where private companies and non-profit organizations provide collection, drop-off, material processing, and reuse and repair services for garbage, recycling, and construction and demolition materials. Further, Metro Vancouver solid waste facilities are operated by private contractors selected through competitive procurement processes. The current solid waste system is highly integrated across sectors, encouraging private sector innovation in circular economy and recycling. Metro Vancouver's tipping fees remain comparable to or lower than other major North American jurisdictions. Metro Vancouver's regulatory framework and the publicly owned regional solid waste system provides convenient drop-off services and promotes waste reduction. The generator levy helps ensure all waste generators contribute to funding the regional waste system, and encourages the use of regional facilities where recyclable materials are banned from disposal. The stability of the public system has allowed investments in customer service, waste reduction, recycling, and greenhouse gas emission reduction.

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264	31-Jul-26	Letter and public statement	Business Council of British Columbia	Business	General	Eroding Competition and Unsustainable Cost Escalation Metro Vancouver's ongoing efforts to eliminate competition are problematic as it is not a neutral referee. It is also the operator that benefits from that waste, and the rate-setter that controls what competitors must pay to operate. Every tonne of garbage generated in the region carries a \$70 generator levy, whether it goes to a Metro facility or a private one.² At Metro's own facilities, that levy is folded into the posted tipping fee.³ At a private facility, the hauler must collect the same levy and remit it to Metro on top of whatever the private operator charges for its own service, while Metro sets that levy rate unilaterally. This makes competing on price virtually impossible, regardless of which facility is more efficient or better located.⁴ Since Metro Vancouver first attempted to consolidate regional waste at its own facilities in 2013, its operational spending on solid waste and recycling has increased by approximately 93 percent (growing from \$82 million in 2013 to \$158 million in 2024), far exceeding both inflation (33 percent) and population growth (25 percent) over the same period.⁵ Of concern for residents and businesses is that this upward trend is projected to continue. Operating costs are only part of the picture. Metro Vancouver's capital spending is also projected to increase significantly. Capital spending on solid waste infrastructure is expected to rise from \$340 million (2025 to 2029 plan) to about \$390 million over the 2026–2030 Financial Plan. This is almost a 15 percent increase in a single budget cycle. Most of this capital plan is funded through new external borrowing. As a result, debt servicing costs for solid waste are projected to rise from \$17 million in 2025 to \$49 million in 2030, nearly tripling in five years. BCBC recommends the following: - Commission an independent, third-party value-for-money review of the solid waste system, including a cost-of-service analysis, an assessment of the capital program and borrowing trajectory, and an analysis of tipping fee structure and levels. - Reassess the licensing and levy framework to identify where competition can be restored and enhanced, working directly with the private sector to produce a public report on options, and using an independent facilitator.	The draft plan was revised to extend financial projections over the 10-year expected plan duration, and include estimated costs associated with each strategy. Expanded financial projections show expected tipping fee increases to continue at approximately five per cent per year over the 10-year timeline. The draft Solid Waste Management Plan includes a Regulatory Strategic Approach which outlines existing and potential future regulations. As identified explicitly in the plan, any proposed new regulatory measures will be accompanied by transparent and meaningful engagement process. Engagement will follow Metro Vancouver's Public Engagement Board Policy and Public Engagement Guide. Metro Vancouver will also comply with any provincial requirement related to public consultation.
265	31-Jul-26	Letter and public statement	Business Council of British Columbia	Business	General	The Need for Independent Governance and Oversight At the core of the problem is a basic failure of governance. Good governance means keeping the roles of policymaker, regulator, operator, and price-setter separate. Metro Vancouver holds all four. It designs policy, regulates the sector, operates the facilities, and sets the prices, while also controlling who else can enter the market. Independent oversight is essential for keeping public spending accountable to the people who fund it. Timing compounds these concerns. In terms of SWMP 2026, it is procedurally imprudent for an outgoing Board to finalize a framework of this size just months before the October 2026 municipal election. Locking ratepayers into a decade-long plan that introduces millions in new debt and restructures market access should not happen this close to a new political cycle. A decision of this scale deserves the fresh mandate and scrutiny of an incoming administration. Metro Vancouver can act on some of these concerns immediately, without waiting on the province. As a first step, it should strengthen internal audit of capital projects, travel, and director payments, and publish the results quarterly. This would cost taxpayers nothing and would help build confidence among residents and the business community that Metro Vancouver has their interests in view. Metro Vancouver could also demonstrate its own commitment to leaner government by formally requesting that the province modify its Letters Patent, through the existing Order in Council process, to reduce the size of the Board and enable its restructuring. BCBC recommends the following: - Delay the finalization of the SWMP 2026 until after the next municipal government election process in the fall of 2026 and the completion of an independent third-party review. - Separate Metro Vancouver's regulatory and commercial functions, apply equal standards to all operators, and provide independent due process for licensing and enforcement decisions. - Request a modification to Metro Vancouver's Letters Patent to enable reform of the Board of Directors' structure, reducing its size and strengthening the direct line of accountability between Board members and the residents they serve.	The solid waste management plan engagement and update process has included extensive industry input through the Industry Advisory Committee; Public Technical Advisory Committee and direct outreach to underrepresented sectors. The input from these sectors has been carefully considered and documented throughout and complete process. In 2025, Metro Vancouver invited Deloitte Canada's governance experts to do an independent review of Board Governance at the organization. The review was completed May 23, 2025, and implementation of recommendations is now underway. updated information on the process is found on Metro Vancouver's website: https://metrovancover.org/boards/board-governance-review
266	01-Aug-26	Email	Whirlpool Corporation	Business	General	Metro Vancouver's efforts to tackle household-generated food waste began more than fifteen years ago, as did InSinkErator's initiative to bring its considerable expertise, technical and best practice research to that effort, gained from its work globally with cities, researchers, and many other stakeholders. Numerous meetings, presentations and sharing of documents later – and both successful and failed efforts by the Region to address household food waste – the challenge remains the same: how to promote effective diversion of food waste, especially from the Region's increasingly vertical multi-residential buildings, and process it into beneficial resources, avoiding disposal in truck-delivered landfills and waste-to-energy facilities. InSinkErator continues to believe that in-sink disposers are and can be an effective tool for Metro Vancouver to embrace, rather than to ignore their existence or discourage actual use. The most recent waste composition study reports that diverting food scraps from apartment buildings remains a significant challenge, despite substantial efforts to reform public behavior. We have especially noted the opportunity to connect food waste recovery and processing with the Region's wastewater system, which is increasingly focused on managing wastewater as resources and is well-suited to handling food scraps to produce clean water, biogas and biosolids. We also have commented about that opportunity to the Region's Liquid Waste Management staff and Committee as it considers a similar plan, in parallel to the Solid Waste plan. Although it is tempting to consider food waste as a "solid", in fact it is primarily water, and can be effectively managed through either the solid (with trucks) or liquid waste systems (through pipes). With disposers already in common usage throughout the region, even just a little encouragement by the Region in its outreach and educational materials about use of the garburator could be helpful in targeting that elusive last portion of household food still being trashed. Convenience is most cited consideration by residents about their waste management practices and habits, making disposers an easy choice. InSinkErator has partnered with numerous cities across Canada, the U.S. and the world for exactly that purpose, and continues to support technical and best practice research to support well-informed decision-making by elected officials and agencies. Recently we helped the City of Vancouver to better understand those benefits, leading to its rejection of proposed restrictions.	Metro Vancouver received and considered feedback from Whirlpool Canada through a number of engagement opportunities including a meeting with Metro Vancouver Solid Waste Management Staff and presentation to the Zero Waste Committee and the Public Technical Advisory Committee in November 2024. On October 31, 2025, the Greater Vancouver Sewerage and Drainage District (GVD&DD) Board authorized staff to submit the updated Liquid Waste Management Plan to the Minister of Environment and Parks for consideration. Once approved by the Province, the plan will become legally binding and guide wastewater management actions across the region. As stated in Stragey 3 of the updated plan larger flows and loadings result in the need to build larger and costlier infrastructure. Subsequently, the support actions look to discourage disposal of food waste down drains, by encouraging the reduction of food waste in general and encouraging the use of green bins for kitchen scraps. The updated solid waste management plan, in alignment with the update liquid waste management plan, looks to reduce food waste going to disposal by encouraging the proper use of green bins.
267		Feedback Form			Regulatory Strategic Approach	It is important for Metro to work in concert with neighboring municipalities and collaborate with them. This action should be part of the mission statement and objectives. As an example, people in the Fraser Valley Regional District should have unrestricted access to residuals from Metro Vancouver. Currently, Metro blocks this.	Neighbouring regional districts are identified in the plan under Governance, Roles and Responsibilities. Metro Vancouver works collaboratively with adjacent regional districts to discuss consistency in solid waste management to work toward shared priorities on waste reduction and recycling. Metro Vancouver does not block waste from leaving the system. Every person who generates municipal solid waste (garbage) within the Greater Vancouver Sewerage and Drainage District (GVS&DD) must pay a generator levy to help fund the regional solid waste system. This system provides reliable and resilient waste and recycling services that benefit and are available to all residents and businesses who generate waste in the region.
268		Feedback Form			General	The plan talks a lot about increasing the organics diversion and increasing access for multifamily and businesses, both group that need to hire private haulers. This does not seem to correlate with the forthcoming increase in organic disposal fees by \$25/mt. For a multifamily property or small business, this is somewhere in the range of \$3.25 in increased disposal cost per 64g tote, or almost an additional \$170 / year. This also puts the disposal rate for commercial organics higher than the landfill disposal fee. This sort of discrepancy between plan and action will have negative longterm impacts on achieving goals if they continue.	Metro Vancouver understands that the proposed \$155 per tonne municipal organics cost is similar to costs experienced by other municipalities, particularly when accounting for transportation costs for municipalities distant from processing facilities.

No.	Date	Source/Material	Organization/Group	Sector/Audience	Plan Section	Feedback/Comment	Metro Vancouver Response
269		Feedback Form		General		You seem to put all responsibility on the consumers of goods and their need to curb solid waste. What about the manufacturers of goods and their terrible packaging? In Europe the emphasis is on the manufacturers to make packaging more environmentally friendly. This is missing from your plan.	Strategy 1.1 Advocate for circular economy policies and programs has a number of actions related to changing the system to transition away from the current take-make-dispose economy. Action 1.1.2 specifically looks to advocate for the phase-in of regulations that eliminate unnecessary, problematic, non-recyclable products and packaging. Strategy 1.3 collaborate to advance a circular economy complements Strategy 1.1 by look at bringing industries together to find pre-competitive solutions that support waste reduction. Through policy advocacy and collaboration the plan addresses the need to improve design for waste reduction for products and packaging.
270		Feedback Form		General		This is, by far, one of the most practical and forward-thinking solid waste management plans I have ever had the pleasure of reading. It has aggressive but pragmatic targets, and has identified most (if not all) of the pathways to achieving those targets. One can only hope that the Ministry whole-heartedly supports this plan, and that the Region continues to be clear-eyed about how it prioritizes and innovative in how it operationalizes the goals, strategies, and actions.	Thank you kindly for your support.
271		Feedback Form		General		We need more incentives for residents and businesses to properly sort their waste and divert useful recyclable and compostable materials away from the landfill, as well as try to minimize resource use as much as possible. We also need more enforcement and fines applied for those that don't seem to care and just throw everything in garbage. The City is too scared to fine property owners and residents but when soft approach and letters fail to change their behavior, it makes sense to use some other tools! Way too many businesses and residents (especially in high rise buildings) do not participate in waste diversion because they face no incentive to change their behavior and do the right thing. We need to change that!	A key focus area of the plan is to increase access to organics and recycling services for multi-family and businesses through a mix of policy, education and collaboration. Action 1.1.2 specifically looks to advocate for the phase-in of regulations that eliminate unnecessary, problematic, non-recyclable products and packaging. Strategy 3.2 looks to improve EPR including challenges with foam and soft plastic, by making soft plastics available with home recycling and improving access for small businesses to recycle foam at recycling and waste centres. City of Vancouver South Transfer station is part of regional waste system. Municipal Recycling Depots are provided funding and include the Vancouver Zero Waste Centre
272		Feedback Form		General		Needs a brief non-repetitive version of this monster document (essentially unreadable) for regular folks. Current restrictions on plastic/ foam packaging recycling is annoying. Does the plan keep Vancouver transfer station and expand its recycling roles?	The focus areas summarize the key messages to address feedback that the plan is too long while keeping the many important actions that staff need to do to successfully implement the plan.
273		Feedback Form		General		No	This online feedback survey response was included for completeness, but has no response due to staff not knowing how to interpret it.
274		Feedback Form		General		the overall goal of the plan is achievable and leadership from Metro Vancouver will help to move the whole province forward.	Thank you kindly for your support.
275		Feedback Form		General		We are disappointed not to see the phase-out of the use of 'Waste to Energy', also known as 'Landfill in the Sky' in MetroVancouver's Solid Waste Management Plan. While burning unrecycled waste can be an attractive option for places without a lot of room for landfill, this practice has serious human health impacts. Even for well regulated facilities, 'allowable emissions', 'fugitive emissions', and even 'unplanned releases' are all part of the incineration process. Unless emissions are trapped and put underground, these emissions also count towards the organizations GHG footprint, and the particulate matter involved affects everyone's health who lives around the plant. With decades of experience with incinerators in our region, we encourage you to carefully plan the phase down, and eventual phase-out of this dangerous infrastructure.	Recent public health risk assessment completed in consultation with health authorities concluded that emissions from the Waste-to-Energy Facility do not pose a public health risk. Waste-to-energy is a safe and cost-effective method for managing residual garbage. Waste-to-energy costs are consistent with local landfilling, and half of remote landfilling. Emissions from the Waste-to-Energy Facility are closely monitored and openly shared in real time online, in addition to being reported to regulators. All regulated emission parameter values are below regulatory emission limits, and reporting shows that in 2025 emissions from the facility were on average 15% of regulatory limits. As part of Waste-to-Energy Facility operational certificate requirements, Metro Vancouver conducted a series of technical work including a public health risk assessment in collaboration with health authorities, to support proposing updated emission limits and additional monitoring. Metro Vancouver will conduct engagement prior to submitting final proposed emission limits and additional monitoring for consideration by the Ministry of Environment and Parks. Results of a rooftop monitoring study indicate that particulates accumulating on a warehouse roof near the Waste-to-Energy Facility are not the result of deposition from the facility. Metal, dioxins, and furan concentrations on the warehouse roof, other nearby roofs, in roadside dust and in soils near the Waste-to-Energy Facility are not significantly impacted by emissions from the Waste-to-Energy Facility.
276		Feedback Form		Targets/Metrics		My concern is that the current Solid Waste Management Plan does not clearly demonstrate a commitment to delivering Metro Vancouver's Climate 2050 objectives. If Climate 2050 defines where we want to go, then the Solid Waste Management Plan should clearly show how we're going to get there, with measurable actions, accountability, and outcomes.	The draft plan notes that as waste disposal decreases, associated GHG emissions decrease as well. Meeting the 50% disposal target will decrease emissions by at least 50% if high GHG emitting materials are targeted. The draft plan also describes how it aligns with existing Metro Vancouver plans such as Climate 2050 and the Solid Waste Primer.
277		Feedback Form		General		Thank you for recognizing that soil disposal takes up too much room in the Vancouver Landfill. In Section 6.4.5, could you go beyond the proposal to pursue opportunities for beneficial reuse of soil within the Vancouver Landfill property and instead pursue opportunities for beneficial reuse of soil within the region? This could include taking procurement measures such as requiring new Metro Vancouver projects to incorporate reused soil or aggregate into construction (as opposed to using virgin quarried materials) or requiring a percentage of the waste or excess soil generated by municipal or regional projects to be reused.	Thank you for your feedback. While the draft plan doesn't directly include actions with respect to beneficial reuse of soil, it does support circular procurement approaches in Actions 1.3.5 and 2.1.6.
278		Feedback Form		General		Regarding section 4.2.2 - it should be noted that there is significant organic waste processing capacity already in the Lower Mainland, Sea to Sky corridor and Interior all of whom currently process organics from Metro Vancouver and the FVRD. By adding an additional facility would be detrimental to existing facilities that are already needing more organic wastes.	Impacts to existing facilities will be considered and discussed prior to the implementation of Action 4.2.2.
279		Feedback Form		Targets/Metrics		The proposed 2026 Solid Waste Management Plan is long on vision but short on actionable measures that Metro Vancouver itself can deliver. Much of the Plan relies on actions by others, including municipalities, industry and the private sector. The car is very much in front of the horse. Metro Van has advanced major infrastructure projects before the SWMP has been finalized and approved, leading to the belief the key decisions have already been made. All the while Flow Control is being established through infrastructure decisions, facility ownership and the regulatory framework Metro Van have in place. This is of concern because Metro Van is our regulator and competitor, stifling long-term private sector investment in the region. The Plan references hauler licensing but provides limited detail on how such a system would be implemented, what specific problem it is intended to address, or the impacts on private sector. Hauler licensing and flow control have been tabled 5 times by Metro Vancouver and were deemed Anti-Competitive by the Competition Bureau of Canada in 2020? After years of consultation, there is little evidence that industry feedback has meaningfully influenced the direction of the plan, The Province should review Metro Vancouvers model whether the current structure provides value that best serves the interests of resident's municipalities and industry.	The draft Solid Waste Management Plan sets out priorities for the continued operation and enhancement of the Metro Vancouver recycling and waste centre network, to improve convenience and access to reuse and recycling opportunities for all residents and businesses in the region. Cost-effectiveness and affordability are key areas of focus. Metro Vancouver's robust regulatory framework and the publicly owned regional solid waste system provides convenient dropoff services and promotes waste reduction. The generator levy helps ensure all waste generators contribute to funding the regional waste system, and encourages the use of regional facilities where recyclable materials are banned from disposal. The stability of the public system has allowed investments in initiatives that support customer service, waste reduction, recycling, and greenhouse gas emission reduction. The draft plan has been revised as follows: Included a section on Competition, Innovation and Affordability, describing the public system's consistent rules and pricing as enabling innovation and competition in the private sector. The new section describes the current integrated system where private companies and non-profit organizations provide collection, drop-off, material processing, and reuse and repair services for garbage, recycling, and construction and demolition materials. Further, Metro Vancouver solid waste facilities are operated by private contractors selected through competitive procurement processes. Added more clarity in the Regulatory Strategic Approach section to describe conditions and the process/engagement for consideration of potential future regulations, as well as specifying the approvals required (e.g. several would require provincial approval to be implemented)
280		Feedback Form		General		As a professional agrologist and environmental practitioner I believe more needs to be done to ensure contaminated soil (including soil with invasives) needs to be managed in a way that is consistent with best management practices and in line with federal, provincial and municipal regulations. The draft solid waste management plan addresses all other forms of waste but is lacking direction as to what generators are obligated to do with clean and contaminated soil. This lack of direction results in the mismanagement of soil that will end up costing future generations and the region more in the long run as the cost to properly treat and dispose of waste will only increase over time.	The draft plan focuses on municipal solid waste and as such does not contain actions for soil management, however the draft plan has been updated to add invasive species and toxic plants to the list of materials requiring dedicated handling or disposal.

No.	Date	Source/Material	Organization/Group	Sector/Audience	Plan Section	Feedback/Comment	Metro Vancouver Response
281	28-Jul-26	Letter to MV and to Provincial Ministry	New West Gypsum Recycling	Waste and Recycling Industry	General	Despite this success, the MVRD's current solid-waste bylaws and Solid Waste Management Plan allow recyclable construction materials to leave the region untracked as "mixed construction debris" for landfill disposal. Recent regulatory changes appear to have made this practice even easier as loads delivered to facilities outside of the MVRD are exempt from tracking and reporting requirements. This raises serious concerns about the accuracy of the region's reported diversion rate, which the MVRD frequently describes as exemplary. Large stockpiles of mixed construction waste at yards in South Abbotsford, much of which is reportedly destined for disposal in United States landfills, demonstrate the need for greater transparency, accountability, and enforcement. To protect local recycling infrastructure and ensure that recyclable drywall is properly recovered, the MVRD should prohibit drywall generated by construction, renovation, and demolition projects from leaving the region.	The draft plan has been revised to add a new action to develop a method to better track and account for construction and demolition waste potentially leaving the region.