Solid Waste Management Plan Update: Initial Draft
Solid Waste Management Plan Public/Technical Advisory Committee Feedback Session

Thursday, February 19, 2026
Metro Vancouver – 4515 Central Boulevard, Burnaby
29 Floor, Room 2912

Metro Vancouver is updating its regional solid waste management plan, building on the strengths of the current plan and identifying ways to accelerate waste reduction and recycling, reduce greenhouse gas emissions, and advance a circular economy. Metro Vancouver is currently receiving feedback on the initial draft solid waste management plan.

On February 19, 2026, Metro Vancouver held a feedback session on the initial draft plan at a Solid Waste Management Plan Public/Technical Advisory Committee meeting. The session included two components – a round-robin opportunity for each member to provide a few words summarizing their main feedback on the initial draft plan, followed by small-group discussions.

Prior to the meeting, Metro Vancouver polled members to identify priority parts of the plan for small group discussion. Final small group topics were:

- Residuals Strategy
- Regulatory Strategy
- Targets and Metrics
- Overflow (Financial Overview, Definitions, Plan Monitoring, Recycling and Waste Centre Strategy, Disposal Actions)

SUMMARY OF FEEDBACK

Below are highlights from feedback at the session, categorized by the small group topics. Feedback will be considered as the draft is revised in preparation for providing to the Zero Waste Committee and GVS&DD Board. Following Board consideration, there will be an additional opportunity for comment prior to submission of the draft to the Ministry of Environment and Parks for approval.

THEMES FROM ROUND-ROBIN
(each member provided up to 2 minutes summary of their main feedback on the initial draft plan)

- **Definitions & Scope:** Lock in precise definitions (recycling, diversion, recovery, circularity, "waste" as a verb rather than a noun), explicitly anchoring to Zero Waste hierarchy (incl. "rethink") and circular economy.
- **Stronger, Mandatory Regulation:** Move beyond pilots/soft language and tighten disposal bans, require region-wide source separation, and expand inspection/enforcement (incl. private sector/construction and demolition).
- **Residuals Strategy & Waste-to-Energy:** Phase out the Burnaby Waste-to-Energy facility, with an aligned disposal strategy and transparent capital cost implications.
- **Targets & Metrics:** Set specific, time-bound, sector-specific targets (incl. per-capita waste and food-waste targets) with secondary metrics and benchmarks.
- **Monitoring & Enforcement**: Expand progress reporting (esp. food waste), do region-wide spot checks on residential curbside (e.g., clear bags), and apply consistent penalties.
- **Reuse/Repair/Circular Infrastructure:** Scale deconstruction, reuse, repair cafés/reuse days, house relocation; enable reuse at depots; fund non-profits and innovators.
- **Budget, Resourcing & Timelines:** Provide transparent budgets, clear implementation timelines, and adaptive management check-ins.
- **Equity & Access:** Ensure services work for residents without cars, (i.e. provide limited bulky-item pick up for supported housing) to reduce service inequities.
- **Education & Consistency:** Unified regional messaging, simpler public materials; consistency across municipalities (e.g., multi-family housing recycling rooms).
- **Regional Roles & Collaboration:** Greater clarity on Metro Vancouver's support to municipalities (Plan section 4.2 & 4.4), extended producer responsibility roles/classifications, and retail/institutional/commercial partnerships.
- **Climate & Health:** Tie actions to consumption-based emissions and human health outcomes; make environmental outcomes explicit.
- **Plan Ambition & Governance:** Keep the plan progressive, with measurable actions, clear governance alignment, and solution pathways.

REGULATORY STRATEGY

What needs to be strengthened?

- **Need for Stronger, Clearer Regulations**
  - Need specific, concise regulations to reduce waste and improve clarity.
  - Clear guidelines on what can be recycled, how materials must be handled, and increasing disposal ban inspections to reduce contamination levels.
- **Enhanced Enforcement & Disposal Bans**
  - Strengthen implementation and enforcement of disposal bans (including at Waste-to-Energy facility).
  - Make enforcement consistent across all facilities and municipalities.
- **Financial Accountability & Incentives**
  - Use fines, load rejections, and tipping fee adjustments to create meaningful consequences.
  - Fines should motivate both haulers and site management to change behavior.
  - Increasing tipping fees may further incentivize proper waste separation.
- **Pay-as-you-throw & Clear Bags**
  - "Pay-as-you-throw" models used in Europe or mandatory clear bags could increase accountability but risk illegal dumping if residents don't want to participate.
  - Clear bags as a potential tool for simplifying inspection and preventing cheating.
- **Hauler Responsibility**
  - Haulers must take responsibility for contaminated loads and educate customers.
  - Clear mechanisms are needed so haulers cannot avoid responsibility or push back.
  - If contamination persists, haulers should face increased costs or lose customers due to higher service fees.
- **Source Separation as Core Strategy**
  - Mandatory source separation across all streams (organics, recycling, garbage).
  - Keep the system simple, enforceable, and uniform across municipalities.

What is missing?

- **Targeted Campaigns & Behaviour Change**
  - Consider phased campaigns focusing on one priority material at a time (e.g., organics).
  - Regulations and communication campaigns must work together.
  - Long-term education is required for residents to understand and adopt waste reduction habits.
- **Metro Vancouver's Role**
  - Metro should maximize its enforcement powers at regional facilities.
  - Could also track sector performance, redirect budgets strategically, and hold municipal members accountable.
- **Strengthening Construction & Demolition Oversight**
  - Learn from places like San Francisco: license haulers and receivers more thoroughly, audit them, and track recycling performance.
  - Increase transparency around actual construction & demolition waste volumes and practices.
  - Current construction & demolition targets and reporting lack accuracy and clarity.
- **Clear, Accessible Regulations**
  - Residents and businesses face confusion about what can be recycled.
  - Regulations should specify recyclable materials clearly, with stronger supportive language.

- Need simpler, more accessible information resources, currently there are too many existing and it causes confusion for residents.

- **Linking Policies Across Sectors**
  - Connect food policy, climate policy, and waste policy for mutual benefit.
  - Clarify roles for municipal, regional, and provincial governments.
- **Clarifying Metro Vancouver's Regulatory Authority**
  - Include a clear list of what Metro *can* and *cannot* regulate.
  - Identify where provincial or federal leadership is necessary (e.g., food waste reduction incentives).
- **Data Transparency & Public Reporting**
  - Strengthen open-data reporting to track progress on goals, budgets, and performance.
  - Provide easy-to-understand visual summaries of waste data available online.
  - Use accessible language to build trust and communicate results effectively to the public and to businesses.

What is working well in the draft?

- **Events & Waste Reduction**
  - Advocate for mandatory source separation at events.
  - Currently Metro Vancouver does provide toolkits, budget planning guides, and checklists to support organizers, these could be strengthened.
  - Metro Vancouver can establish/coordinate best practices even if it cannot legislate event-specific bylaws.
- **Effective Use of Regulation to Drive Diversion**
  - Organics disposal ban demonstrates regulation's ability to dramatically improve diversion.
  - Industry resistance is common, so incentives and penalties must be balanced.
  - Encourage compliance through business licensing tied to recycling/diversion plans.

TARGETS AND METRICS

What is the most important issue in this topic area?

- **Need for Clear, Specific, and Measurable Targets**
  - Set defined, sector-specific, and/or explore material-specific targets.
  - Differentiate impact across initiatives/events and across commercial/ICI sub-sectors.
- **Alignment Between Goals, Metrics, and Measurement**
  - Targets only work if they are paired with coherent metrics and consistent measurement frameworks.
- **Precision in Language and Intent**
  - Terms like "climate neutral" may be misunderstood and should be refined for accuracy and clarity.
- **Ambition and Resourcing**
  - Goals should be more ambitious, and the budget should reflect the scale of desired impact.

What is working well in the draft?

- Establishing a coordinated policy framework by collaborating closely with municipalities.
- Strengthening the waste-reduction hierarchy through the inclusion of a new “rethink” tier.

What is missing?

- Develop more detailed, sector-specific metrics, particularly for the commercial and institutional sectors, to better reflect differences in waste generation and diversion potential.
- Define clear metrics for each tier of the waste-reduction hierarchy, ensuring consistent measurement from “rethink” to disposal.
- Establish a budget and implementation schedule for each action, along with an assessment of projected impacts, to support transparent prioritization and resource allocation.
- Expand the regenerative design approach demonstrated in construction and explore how similar principles could be applied across other waste streams.
- Provide specific actions and pathways toward climate neutrality, including methodologies and assumptions.
    - Demonstrate the climate benefits of reduced waste generation by quantifying associated decreases in carbon emissions.
- Enhance reporting practices by presenting progress-to-date against targets, with a clear mechanism to adjust or pivot when performance is below expectations.
- Allocate dedicated land and infrastructure to support repair, reuse, reduction activities, and material recovery—particularly for high-value materials such as wood.
- Acknowledge that the upper tiers of the hierarchy are transformative and less easily quantified, while committing budget and effort toward improving measurement to ensure meaningful action can still be tracked and evaluated.

What needs to be strengthened?

- Assess the economic value of items repaired at repair events, rather than focusing solely on the number of items repaired, to better illustrate the financial and environmental benefits of repair.
- Strengthen and expand reuse initiatives, ensuring they play a more prominent role in the waste-reduction hierarchy.
- Shift terminology from “pilot” or “testing” to “policy” and “regulation” to signal commitment, maturity of approach, and long-term implementation.
- Revisit the construction recycling rate, noting that including concrete inflates the overall recycling percentage and may not accurately represent true material recovery performance.
- Increase transparency around recycling processes by clearly distinguishing between materials that are collected and those that are actually recycled, processed, or reused.

Questions asked:

- How did the metrics and targets get derived, did they incorporate increased reduction habits or is it solely based on reduction of just waste (waste composition)?
    - Metro Vancouver Response: The metrics and targets were derived using a combined analysis of annual report data as well as waste composition.

- Are we counting repair metrics?
    - Metro Vancouver Response: We track number of items repaired at cafes but noticed that requesting data deters municipalities from hosting repair cafes.
- What is the source of the climate-neutral actions, and can the associated calculations be shared?
    - Metro Vancouver Response: This is in the Solid Waste Primer, under Metro Vancouver's Climate 2050 strategy.
- To what extent do the proposed waste-reduction targets contribute to achieving climate neutrality by 2050?
    - Metro Vancouver Response: Detailed modeling and emissions-reduction calculations are in progress to verify the degree of alignment with the 2050 climate-neutral objective.

RESIDUALS STRATEGY

What is the most important issue in this topic area?

- Haven't done a deep dive mapping of what to do with waste.
- Many targets are to 2050. What seems missing is a deep dive on capacity, assets needed, costs to manage waste in that timeframe.
- Plan should also account for disaster debris planning.
- Health authority waste is disposed to the Waste-to-Energy (WTE) facility instead of to landfill. This requires contingency planning when WTE is down. Metro Vancouver should explore options.
- Social criteria of the draft Technical Criteria for Evaluation Residual Waste Management Options should consider benefits of appropriate disposal of healthcare waste and address public perception and impact on public health.
- The strategies under Goal 6 should consider treatment of niche waste streams
- Europe considers WTE as a pretreatment to landfill. Look at other pretreatment options instead.
- Look at specific issues such as organics creating methane in landfill, and what is created when waste is burned.
- Why is the plan considering additional disposal capacity? Previously MV had said that increasing WTE capacity would not be considered.
    - Technical criteria for evaluating residual management options is included in the plan if additional capacity is required during the life of the plan.

What is working well in the draft?

- Material recycled is quite significant
- Vancouver Landfill is managed well (testing, etc.)
- Shows ongoing commitments based on what MV is already doing

What needs to be strengthened?

- **Financial and Economic Considerations**
    - Shift spending from disposal toward zero-waste investments; highlight the opportunity cost of disposal-focused spending.

    - Strengthen analysis of capital, operating, and full lifecycle costs.
    - Re-evaluate contingency disposal pricing, consider alternative RFP approaches for better value.
    - Question keeping waste in Metro Vancouver at all costs, suggest closing WTE, paying more for contingency disposal, and reinvesting savings into waste reduction.
- **Regulatory, Testing, and Compliance**
    - Implement stronger regulatory standards, following leading jurisdictions.
    - Add a robust testing program near WTE facilities (river sediment, soil, residential impacts).
    - Expand pollutant monitoring requirements and clarify what must be measured.
    - Advocate for provincial hauler licensing and standardized data reporting.
    - Improve enforcement of disposal bans, supported by better load inspection tools (e.g., clear bags).
- **System Design, Facility Operations, and Waste Handling**
    - Clarify what resources remain in waste streams and why.
    - Separate landfill and WTE in Strategy 6, because their impacts differ significantly (e.g., plastics behave differently in each).
    - Consider burnable vs. non-burnable separation like Japan.
    - Add industry expert consultation to residuals management strategy.
    - Provide more reuse opportunities at Recycling & Waste Centres (e.g., reuse days, bike reuse).
    - Add ability to capture reusable materials during disposal processes (Table 6).
- **Contingency Disposal + Definitions**
    - Describe contingency disposal facilities, locations, and costs more clearly.
    - Add “contingency disposal” to the glossary and distinguish it from “remote landfills.”
- **Public Education, Behaviour Change, and Inspection**
    - Increase education around biomedical vs. standard hospital waste; most hospital waste should go to landfill with proper inspection.
    - Add wildlife-attractant management (e.g., bear-related issues in Coquitlam).
    - Include aggressive reduction targets, enforcement mechanisms, and measures to address potential illegal dumping.
    - Add actions to incentivize behavior change, currently incentives for residents are weak; consider reviewing residential bin fee structures.
    - Promote reuse in addition to recycling, aligning with the waste hierarchy.
    - Improve public understanding of metrics, scale, baseline, and relevance matter.
- **Policy Advocacy**
    - Advocate for extended producer responsibility for tires on rims.
    - Metro Vancouver should lead in waste labeling and reducing misclassification.
- **Communication and Program Strategy**
    - Reconsider tours and communications that overly promote WTE without discussing negative impacts; shift emphasis toward zero-waste education.
    - Recognize that reuse is currently under-emphasized in referenced strategies and needs stronger integration.

Additional Feedback

- What are we doing about reducing soil disposal?
    - Metro Vancouver Response: There is specific action to minimize soil taking up space at the Vancouver Landfill.

- What is the risk and cost incurred if targets are missed?
    - Metro Vancouver Response: Cost differential can be applied to methods to decrease waste.
- The value of landfill space preserved for as long as possible should be considered FVRD did triple bottom line analysis of landfill space.
- What are the beneficial use opportunities for bottom ash?
    - Metro Vancouver Response: Cement plant opportunity to substitute for raw materials. 90% of bottom ash could be used.
- Against beneficial use of bottom ash. Look at best practices to minimize potential toxins from bottom ash.

OVERFLOW
(Financial Overview, Definitions, Plan Monitoring, Recycling and Waste Centre Strategy, Disposal Actions)

What is working well in the draft?

- Appreciate seeing that there will be a plan monitoring committee – next iteration of this group to keep the plan in motion.
- Appreciate Strategy 4.6 and section on tailored recycling information.
- Recycling and Waste Centre Strategy – good to see drive time / consistent services across locations identified.

What is missing?

- Could plan monitoring include focus on adaptive management?
- Could we include public consultation at the plan monitoring phase?

What needs to be strengthened?

- Need better strategy around multi-family. Can we consider regulatory or financial mechanisms to get strata companies supporting diversion better?
- Need more space allocated for sharing/repairing/reuse as well as diversion in multi-family.
- Appreciate there is strategy for extended producer responsibility (EPR) but maybe consider stronger language for consistent EPR. E.g., try to expand on actions 3.2.4. and 3.2.6.
- Need stronger support for circular economy entrepreneurs. Missed opportunity to be more ambitious and invest in land for circular economy facilities and innovation.
- Budget cycle is an issue. How can we fund those working in this space, like through accelerators?
- Would help to have more details on the funding/budget. Have a high-level overview and then budget table but no description of different sections in the budget.
- Need something stronger around contamination/source separation.

Other feedback:

- We need the ability to hear feedback and see updates after one-pagers submitted.

Questions asked:

- Can we put collection facilities at transportation stations, like Skytrain?

    - Metro Vancouver Response: This would require dealing with another entity and having bins where there are large amounts of people, which may not be practical and may pose a security risk.
- What is the engagement budget covering in future years when not in plan development phase?
    - Metro Vancouver Response: It would cover engagement related to plan implementation.
- Can you provide overview of the finances?
    - Metro Vancouver Response: The Board receives a five-year forecast but only approves budgets on a year-to-year basis as we can't fetter future Boards. Can't run deficit budgets.
- Is the economic system at risk?
    - Metro Vancouver Response: Our model is slightly different from other municipalities. Metro Vancouver has a Tipping Fee Bylaw which contains a Generator Levy provision that provides funding to the core parts of the regional system for waste that is taken outside of the Metro Vancouver system for disposal.
- Can the private sector purchase their own landfill?
    - Metro Vancouver Response: Land availability and costs in region are likely prohibitive. Accessibility issues to access landfills outside of the region (road access/border issue).
- Has there been a procurement of land for a new landfill?
    - Metro Vancouver Response: No.
- Does Metro Vancouver have pop-up recycling events?
    - We work with member jurisdictions on this – e.g., we worked with Surrey to have drop off for Surrey residents. Increases awareness in community and numbers ramp up as a result after the events.

Public/Technical Advisory Committee Feedback on Initial Draft Solid Waste Management Plan

Submitted in preparation for the February 19, 2026 Public/Technical Advisory Committee meeting

Name	**Organization**
Allen Lynch	Urban Repurpose
Amika Watari	Mountain Equipment Company
Ben Liegey	Better Table
Bill Chan	
Brenda Martens	BCIT
Christoph Schultz	Recycling Council of British Columbia
Doug Schell	EcoFirst Consulting
Gil Yaron	Light House
Jamie Kaminski	HSR Zero Waste
Jennifer Henry	BC Housing
Louise Schwarz	Recycling Alternative
Marcelle Moreira dos Santos	Dreamstill
Sarah Scanlan	Vancouver Coastal Health
Sue Maxwell	Zero Waste BC
William Selten	

Zeenia Mizan

From: Allen Lynch [redacted]
Sent: February 18, 2026 4:21 PM
To: [redacted]
Subject: Re: Thoughts on February 19th meeting

Follow Up Flag: Follow up
Flag Status: Flagged

My comments on the draft plan are brief and are only related to the Recycling and Waste Centre Strategic Approach. I am writing from the perspective of Urban Repurpose (UR) which has been conducting a pilot project on Reuse Days at the North Shore Recycling and Waste Centre. In addition UR is finalizing a North Shore Reuse Assessment and Strategy Development to identify potential partnerships, assess demand for used goods, identify associated costs and potential revenues, and determine the logistical requirements for an expanded Reuse Days program at the North Shore Recycling and Waste Centre.

Far too many residents and businesses dispose of used goods, furniture and furnishings at the Waste Centre. Unfortunately UR does not have the staff or warehouse space to increase the number of Reuse Days so valuable goods end up on the Waste Centre tipping floor.

Strategy 3.5 of the draft Solid Waste Management Plan describes the need to "Increase access to and foster the broad adoption of reuse, refill and repair". This section goes on to state that Metro Vancouver will work to expand these opportunities and make it easier for residents to access reliable reuse, refill and repair options. The intent is to scale up reuse-drop-off at Metro Vancouver recycling and waste centres and to work collectively with organizations to develop a where to reuse, refill, repair data set that can be displayed in universally accepted maps.

Much more needs to be done to make residents aware that the options are available. Strategy 3.4.1 calls for Metro to advocate for funding for the expansion and a development of reuse and repair infrastructure including a community reuse options database. This is a good step but directing residents and businesses to a non-profit such as Urban Repurpose is problematic as UR does not have a facility large enough to store the quantity of goods that could be dropped off at the Waste Centre or their own facility.

The plan goes on to talk about the need to research and trial additional ways to scale reuse and repair including supporting community-based waste reduction and reuse programs for non-profit organizations, among others. The plan says that Metro Vancouver and member jurisdictions will collaborate to facilitate opportunities

to increase the number and frequency of repair and reuse events. As noted above, organizations receiving the goods need appropriate storage space.

February 19, 2026
Amika Watari

To Metro Vancouver Solid Waste Management Team,

Thank you for the opportunity to provide feedback to this initial draft plan. Please find my comments below.

Budget for foreseeable costs of scaling zero waste initiatives:

- Allocate appropriate funding for the development of toolkits and policies to move beyond voluntary waste reduction programs that currently exist
- Ex. Event waste management toolkits/guidelines exist but requires advocacy and enforcement to ensure consistency across the region
- Ex. Pilot repair cafes funded by Metro Vancouver have been successful in reducing waste and providing education opportunities but require further resources to scale

Define diversion in glossary:

- **Diversion** is not included in the glossary but clearly defined on p. 6 to "include all of the material recycled plus any material used to create alternatives to fossil fuels".
    - **Recover** does not include composting, anaerobic digestion, or *mass-burn waste to energy* (glossary, p. 67)
    - **Reuse** refers to one further use of a product in the *same form* (but not necessarily for the same purpose) (glossary, p. 67)

Targets and metrics:

- Sector specific targets and metrics for high generator industries promotes stronger accountability and strategic planning

Information, language, and digital accessibility:

- While it is Important to have a comprehensive SWMP, the information needs to be digestible and accessible to connect with the community and spark meaningful discussion
- Providing a version with less technical jargon so people can easily understand the strategies outlined could increase participation to achieve these goals

Overall, the focus in this revised plan to advance circular economy reflects the bountiful opportunities within solid waste management for the region to strengthen waste reduction.

Thank you for considering these comments,

Amika Watari, PTAC Member

Ben Liegey - One Pager - Feedback on Draft Solid Waste Management Plan

Waste Generation Target

- 10% reduction by 2040 / 20% reduction by 2050 does not seem ambitious
- Food waste reduction can be achieved much more quickly that general waste
- Suggestion: **Add a secondary food waste reduction target that is more aggressive**
    - Ex in Washington DC: Reduce food waste by 60% by 2032 vs. 2019

Secondary Metrics

- The KPI for Reduce "Amount of preventable food waste in garbage plus a summary of available information on food loss" does not mention "food waste". And what one considers non preventable may be seen as preventable for another one.
- Suggestion: **Track & report food waste generated per capita** (not just preventable)
    - 2016 = 158 kg food waste per capita
    - 2030 target to be aligned with SDG 12.3 = 79 kg food waste per capita

Reduce Strategies & Actions

- After "Recover", Reduce is the goal with the lowest number of strategies & actions, although it is mentioned as a priority
- Suggested actions for STRATEGY 2.3
    - **Explore the feasibility of a business funding program** to support the transition to food waste tracking tools and reporting with digital innovations
        - Business funding explored for reuse (3.4.2)
        - Incentives to encourage reporting for food donations (3.6.1.2)
    - **Map our food waste solutions for all 6 goals (including rethink/reduce)**
        - Food waste solutions mapping beyond just food recovery (3.6)
        - ReFED Insight Engine is a great example of what could be done

Food Waste Reporting:

- Guiding Principles: Accountability from businesses to prevent waste / transparency
- Suggestions: **Commit to a regional annual public report** that breaks down food waste reduction progress specifically for the commercial and institutional sectors

Climate Action:

- Food = 19% of consumption based emissions (vs. 3% of territorial emissions)
- Suggestion: **Improve the quantification of the carbon footprint of food**

Future Regulatory Enhancements

- The 2015 organic disposal ban was one of the actions with the biggest impact in the region
- For Generators, mandatory source separation should be the very least required
- Suggestions: **Explore a food waste reporting requirement** for businesses, **move to penalties after education** (penalties need to be high enough to change behavior)

Definitions:

- Need to clarify some terms
- Suggestion: **Define circular jobs, circular initiatives, preventable food waste**

Comments on the Draft Solid Waste Plan (dated January 22, 2026)
Bill Chan – PTAC Member
February 17, 2026

I would like to thank the members of the Public/Technical Advisory Committee (PTAC), who began this journey in June 2022 and, over the past three and a half years, generously volunteered their time and expertise to provide guidance and support to Metro Vancouver on the Updated Solid Waste Plan. Special thanks to those who remained engaged through the final stages, contributing additional critique and thoughtful comments via their one-page submissions on the January 2026 draft plan.

Thank you as well to Director Kirby-Yung, Director Hodge, Paul Henderson, and the entire management team for stewarding the PTAC through this extensive process — from vision setting and guiding principles to performance targets, strategic priorities, and implementation considerations.

The Draft Solid Waste Plan (dated January 22, 2026) reflects the PTAC's journey. The vision, guiding principles, and overall framework were the subject of meaningful discussion throughout PTAC meetings and are reflected in the Draft Plan. Management consistently reported back to the Committee, on how feedback from discussions was considered and articulated.

I would also like to acknowledge those members who brought specialized industry knowledge and shared valuable perspectives with both the PTAC and management.

I echo the sentiments expressed by colleagues, including those who submitted one-page commentaries. There is a shared passion for a vision where nothing is waste, resources are valued, and environmental stewardship remains central.

Rather than restating previously identified themes, I offer a few general observations, including comments on Extended Producer Responsibility (EPR), an area in which I have spent more than 25 years:

1. **Figure 1 – Targets (page 8)**
   Consider including a visual representation of the current baseline. This would provide clearer context and a more compelling illustration of progress. Targets should reflect bold, transformational change rather than incremental improvement.
2. **Metro Vancouver's Strategic Priorities – "Financial sustainability and regional affordability" (page 10)**
   Consider refining this to: *"Financial sustainability and regional affordability through cost effectiveness."* Affordability is often cited as a rationale for delay, whereas cost effectiveness underscores fiscal responsibility while advancing environmental objectives.
3. **Figure 4 – Waste Composition Over Time (page 15)**
   Clarification may be helpful, as the chart appears to indicate electronic waste at approximately 50 kg per capita, which seems high given that consumer electronics has been subject to an EPR program for nearly two decades.
4. **Strategy 3.2 – Extended Producer Responsibility (page 28)**
   I appreciate Metro Vancouver's commitment to advocating for the continued expansion and enhancement of EPR programs. Consider adding a specific reference to the recycling and collection of lithium rechargeable batteries, reflecting their rapid growth (e-bikes, e-scooters, mobile devices) and the increasing fire risks associated with these materials.

   Additionally, consider removing section 3.2.1, which limits EPR for mattresses and textiles to sector-specific applications (e.g., care homes and schools). A broader advocacy position supporting comprehensive EPR programs for mattresses and textiles may be more appropriate, particularly as other jurisdictions are already developing regulations for these materials.

Brenda Martens – Comments on Draft Solid Waste ManagemeInt Plan

I'll primarily comment on wasted construction resources

1. Follow San Francisco's methodology and track wasted construction resources in all stages, generation, hauling and receiving. This will allow the measurement of resources that leave the region, and provide a means to confirm recycling and disposal rates as there are issues in reporting recycling rates.
2. Report concrete downcycling separately from other construction material diversion. Its weight and volume skew the numbers.
3. Phase out incineration and waste-to-energy and concentrate on eliminating 'waste'. Target specific material elimination, if quantities are known this can be translated to a percentage reduction, but percentage reductions on their own are too vague to plan for whereas material elimination is easier to signal to industry and consumers and to plan for.
4. Prioritize reuse of existing buildings in location. Metro Vancouver's role in this could be education and promotion, as well as implementing for their own buildings.
5. Facilitate and prioritize house relocation (as Metro currently does, but formalize this and add to it, possibly by creating designated movement corridors that are kept free of obstructions - requires working with municipalities) and prioritize deconstruction over demolition – this could be by creating easily adoptable bylaws for municipalities.
6. Define the terms being used, such as diversion, recycling, etc. and use "waste" as a verb rather than a noun. Replace "waste" with "wasted resources" and use the Zero Waste Hierarchy and definition.

RCBC's Comments on Metro Vancouver's Draft Solid Waste Management Plan

The **Recycling Council of British Columbia (RCBC)** appreciates the opportunity to provide feedback on the draft Solid Waste Management Plan.

Guidance

- **Real vs perceived affordability:** While rising costs and affordability are front of mind and concern for all, it would be unfortunate to have "perceptions" of unaffordability be used to justify delays to key system improvements and ambitions with real long-term impact. Just as pausing the inclusion of mattresses to recycling regulation amendments was justified based on affordability concerns, delaying effective waste diversion actions often shifts and externalizes costs in other ways and to other groups.

Targets and metrics

- **Encourage sector-specific accountability:** Effective waste management requires precision. The more specific targets are, the more effective efforts can be to achieving them. We encourage the plan to incorporate sector-specific targets for Residential, Multi-family, ICI, and C&D sectors. This ensures that enforcement and resources are directed exactly where the issue is greatest, allowing for sector-specific compliance tracking and greater accountability that can drive more effective improvements. It would be valuable to see the estimated impacts of the actions outlined in the plan, by sector, to know which are expected to be the most impactful.

Regulatory enhancement and enforcement

- **Mandate source separation for ICI & C&D:** As discussed in the last meeting, regulatory enhancements have been some of the most effective mechanisms to increase waste diversion. We would encourage Metro Vancouver to initiate the process to adopt mandatory source separation for ICI.
- **Stricter organics ban enforcement:** We support stricter enforcement of the organics ban by increasing inspections and implementing clear bag policies to address the persistent volume of organics, plastics, and packaging that still ends up in landfill.

Budget allocations

- **Meaningful resources dedicated to Rethink, Reduce, Reuse, and Recycle:** We would like to see narrative surrounding strategies 1-4 in the plan translate into meaningful resources to strategies higher up the waste hierarchy. While it's not entirely clear what the breakdown of allocations will be from the budget presented it appears to show that less $3 million of a total budget of $169 million will allocated to Zero Waste Implementation in 2026. We would like to see this broken out further and for it to be increasing in subsequent years, at least at the same rate as the overall budget. There are many impactful initiatives outlined in strategies 1-4 in the plan and it would be unfortunate for them to not be implemented because of a lack of funding when a disproportionate amount of funding is going to cover the cost of disposal and recovery.

Doug Schell - One Pager Feedback MVSWP (draft) Feb 2026 PTAC

Current System

The current system emphasizes coordination and reporting, but lacks independent verification, consistent enforcement, and structural accountability.

Education and Collaboration

While education and collaboration remain important, they cannot overcome economic incentives that favour disposal, poor product and building design, inconsistent enforcement, and opaque data reporting.

Infrastructure

Disposal and recovery infrastructure provide system stability but without upstream accountability and independent verification they can normalize residual waste, discourage recycling investment, lock in material loss, and undermine the credibility and comparability of reported diversion and circular economy performance

Case for an Ombudsperson or Agency

Complex waste systems cannot credibly self-regulate, and a Solid Waste and Circular Economy Ombudsperson is needed to independently verify performance, standardize metrics, ensure transparent reporting, and ensure that performance verification and compliance findings are independent of political influence

What Success Looks like

With independent oversight, residual waste is treated as a problem to reduce rather than a performance credit, disposal is clearly separated from recycling and prevention, and strong performers are distinguished from chronic underperformers.

Focus on strong disposal ban enforcement, mandatory source separation, third party audits and independent administrative oversight.

Recommendations

-Independent oversight of waste system performance
-Commit to stronger disposal ban enforcement
-Mandatory source separation requirements
-Generator audits
-With the increased capacity on landfill space at the Vancouver Landfill the Waste to Energy Plant should be targeted for closure as soon as possible.

Waste Reduction can't be achieved through aspiration alone.
It requires governance structures that make performance unavoidable.

[redacted]

Comments regarding Metro Vancouver's Draft Solid Waste Management Plan

February 18, 2026

Light House commends Metro Vancouver on enhancements made to the draft Solid Waste Management Plan dated January 22, 2026. While the draft SWMP makes strides in prioritizing circular economic activity, it generally lacks teeth to ensure that regional actions also prioritize higher level activities in the pollution prevention hierarchy. The plan as worded allows the status quo to be maintained with only lip service offered to circular strategies.

Accordingly, we urge Metro Vancouver to make the following additional amendments to the draft SWMP, some of which are articulated in the submissions of other members of the Solid Waste Management Plan Technical Advisory Committee:

- In line with the purported vision, refrain from using the term "waste" wherever possible and replace it with "material" or "resource" to reflect the need and opportunity to rethink how we view materials.

- Invest in zero waste solutions instead 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.

- Commit a percentage of the Solid Waste budget to circular initiatives.

- Strengthen Rethink and Reduce strategies by including measurable targets (including interim and long-term) and clearer definitions.

- Gather metrics from circular economy operating business (re-use/refill/repair/share) to ensure we incorporate avoided waste into regional waste prevention statistics and achievements.

- Set real targets for expanding public and private infrastructure supporting the higher uses in the PPP, similar to how Metro Vancouver just negotiated to expand the life of the Vancouver Landfill.

- Secondary metrics under the “reduce” goal need to more clearly address ALL single-use items, including single-use packaging on construction materials. The metrics currently have a very residential flavour in relation to single-use plastics. Single-use plastics from the construction sector dwarf the volumes of single-use plastics from residential uses and need to be called out and addressed.

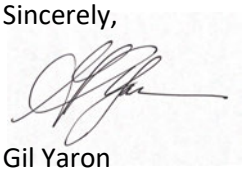
- In addition to encouraging private sector solutions to increase waste reduction and recycling in the region (p.15), Metro Vancouver needs to address policies that undermine private sector innovation. For example, failing to enforce rules governing the handling and disposal of CRD materials and allowing industry players to avoid responsibility for the illegal handling of materials (e.g. avoiding abatement and removal of gypsum/drywall) by shipping demolition waste across the Canada/US border or be disposed in unauthorized locations to avoid regulatory requirements.

- In that regard, commit to enhancing enforcement of regional rules governing solid waste management, particularly with respect to CRD material, and commit to report out on enforcement efforts and acts of non-compliance.

- Expand strategy 3.3.1 to cover regional projects and all new applications, not just new products (e.g. using reclaimed wood for public trails and recreational amenities like park benches and tables).

- Expand strategy 3.4.3 to include site infrastructure, not just single-use items.

Sincerely,



Gil Yaron
Managing Director, Circular Innovation

HSR Zero Waste
Six Structural Corrections Required in the Draft Solid Waste Management Plan

A credible Solid Waste Management Plan must rely on clear definitions, honest accounting, and enforceable policy. When destructive pathways are credited as progress, diversion rates are inflated and system weaknesses are hidden. The following structural corrections are required.

1) Define Recycling Properly
Recycling must mean the mechanical processing of discarded materials into products or materials for original or other purposes. It must exclude incineration, reprocessing into fuels, backfilling, and materials used as landfill cover. Combustion is destruction, not recycling.

2) Distinguish Recovery Categories
The Plan must clearly separate recovery of materials for the purpose of recycling and composting from recovery of materials for the purpose of fuel. The first attempts to return materials to productive use after system failure. The second permanently removes materials from the circular economy through combustion or thermal conversion. These outcomes are not equivalent and must never be grouped together.

3) Do Not Count Recovery as Diversion
Diversion must measure prevention, reuse, recycling, and composting. Recovery occurs only after proper source separation has failed. It may salvage some value, but it does not represent successful system performance. Recovery for the purpose of fuel is disposal. Neither form of recovery should count toward diversion targets.

4) Set Sector Specific Targets
Diversion goals and reporting must be separated for Residential, Industrial Commercial and Institutional, and Construction and Demolition sectors. Aggregated reporting masks underperformance and weakens accountability.

5) Enforce Disposal Bans and Implement Black Bag Inspections
Metro Vancouver already has disposal bans and inspection authority. These tools must be fully utilized. The Plan should commit to increasing inspection frequency at all disposal facilities and implementing black bag inspections, which are not currently being conducted. Consistent inspection at transfer stations, landfills, and the Burnaby incinerator, with public reporting of results, is the fastest way to drive source separation at businesses and residences.

6) Phase Out Incineration and Acknowledge Its Liabilities
The Plan should establish a clear pathway to phase out the Burnaby incinerator. Incineration produces greenhouse gases, air contaminants, and toxic ash, and represents long term environmental and financial liability. As an owned public asset, it carries regulatory risk, escalating retrofit costs, and potential stranded asset exposure. It must never be presented as renewable or environmentally beneficial.

Metro Vancouver PTAC feedback:

Jennifer Henry

1. Require and fund Enforcement of landfill bans and inspection of loads. Fine haulers and publish data on the number of loads inspected/fined.
2. Use the Zero Waste Hierarchy and definition. Eliminate the goals for recovery in favour or more work on reduction.
3. Develop and publish a plan to close the Burnaby incinerator.
4. **Invest** in (or allocate space to) infrastructure to support Zero Waste innovators, using the Zero Waste Demonstration site at the City of Vancouver plan as a reference.
5. Require minimum 3 stream separation for all ICI across all municipalities in Metro Van. Use the City of Vancouver's business license application as a model for all other other municipalities to use.
6. Require clear bags for commercial and multi-family (if not all) loads tipped at our landfill.

Metro SWM Plan Feedback - Louise Schwarz (Feb 2026)

Targets and Timelines

- Set more ambitious targets; set targets in-line /consistent with regions in Canada & US that are leading the pack in waste prevention goals and metrics
- Timelines should be more immediate with a maximum 5 year cadence, (i.e. 2032; 2037, 2042 etc) and a potential structure for 'mid-term check-points' (i.e. 2029; 2034; 2039) in order to understand and monitor progress/compliance towards Metro's targets
- Longer timelines are hampering concrete action, slowing down system improvements and ultimately facilitating 'target slide'
- This way the region can identify consistent challenges to inform Metro's strategy and future regulation/education/infrastructure implementation and enabling region to 'course correct' and/or adopt improvements

Metrics

- ICI should be tracked Sector by Sector to identify gaps, gauge sector compliance, target enforcement and accurately apply penalties to drive improved waste prevention/
- Possible ICI Sector Categories: Multi-Family; Office/Business Services; Food/Hospitality; Retail; Schools; Post Secondary; Government
- Public reporting on non-compliant sectors (i.e. # of fines/penalties applied to each sector)
- Gather metrics from circular economy operating business (re-use/refill/repair/share) to ensure we incorporate avoided waste into regional waste prevention statistics and achievements

Policy & Regulation

- Region-wide Source Separation requirements for all Metro municipalities/districts
- Consider clear bag requirements - especially for ICI sector

Enforcement

- Increase inspection capacity at transfer sites
- With increased capacity incorporate SPOT CHECK bag tear visual inspections with photos for verifiable fines back to generator companies (through the haulers)
- Consider focusing campaigns/fines on specific streams - especially with regards to organics in the garbage
- Is it more effective to 'blanket the region' with stream by stream campaigns on the top banned categories still found in the garbage (i.e. Organics); focus enforcement/penalties on the targeted stream and measure associated increased compliance; after 11 years of organics bans, why are businesses and multi-family still placing organics in the garbage with few consequences? There is an education/enforcement/penalty gap

Circular Economy

- Proactively engage and leverage the existing eco-system of circular businesses and innovators, already operating/providing waste prevention/waste avoidance options in the region; we don't need to re-invent this wheel; we need to 'un-obstruct' the pathway
- Facilitate and enable expansion of circular models through regulatory frameworks that help rather than hinder the growth of such services/products in the region
- When hurdles remain in place, these types of businesses fail; early adopter momentum cannot be maintained; and broader mainstream roll-out/adoption cannot evolve

Additional suggestions for EPR - Extended Producer Responsibility (Prov. Jurisdiction)

- Despite EPR's being under provincial jurisdiction, Metro should continue to press EPR structure in the following areas:
    - Responsible/verifiable reporting from producers to demonstrate they are proactively complying with EPR goals to 'design waste' out of their products
    - This way, EPR programs can demonstrate they are moving 'up the waste hierarchy' to prevent waste rather than developing infrastructure and systems to manage materials at the end of the tailpipe
    - Developing EPR local end markets that keep these stewarded materials in the region they were purchased/consumed/disposed
    - Verifiable/ transparent reporting on what end markets/end products EPR materials are being processed into (i.e. if textiles do not have a verifiable downstream they should not be counted as recovered, despite being collected)

February 17, 2026

To Whom It May Concern,

I am writing on behalf of Dreamstill and in my personal capacity as Marcelle Moreira dos Santos, a Metro Vancouver resident and participant on the Metro Vancouver Public and Technical Advisory Committee for the Solid Waste Management Plan (SWMP) Update. I appreciate the opportunity to provide technical feedback to strengthen the region's waste reduction strategy. The comments below are informed by my professional experience as co-founder of Dreamstill, a social enterprise that has engaged 800–1,000 participants in textile repair, reuse, and sharing initiatives over the past two years. And as an innovator currently prototyping an automated textile intelligence system designed to reduce sorting costs from approximately $0.15 per garment to $0.02 by combining computer vision, infrared spectroscopy, and a routing decision engine.

Given Metro Vancouver's goal to reduce waste disposal to 170 kg per capita by 2050, textiles represent a strategic opportunity. At approximately 8 kg of textile waste per person annually, textiles are a relatively small portion of the waste stream but one that is highly recoverable. Given the wide range of viable reuse and recovery pathways—such as insulation, fiber respinning, stuffing, industrial applications, and composting for natural fibres—textiles should not be entering disposal streams at scale.

Overall, the SWMP would benefit from greater specificity, stronger commitments, and a plan to phase out the use of the incinerator.

Many actions within the Rethink and Reduce strategies would be strengthened by measurable targets and clearer definitions. Terms such as "advocate" and "connect" appear frequently but lack operational detail. For example, how often will advocacy occur, through which channels, and with what intended outcomes? Similarly, what constitutes successful "connection" under Strategy 2.1.3?

The plan also references "identifying" opportunities for circular businesses and "researching" reuse and repair options. However, much of this exploratory work has already been conducted by organizations and startups operating in the region. For instance, Dreamstill has developed software capable of identifying garment condition and recommending next-life uses with 40% accuracy; further improvements primarily require database expansion rather than feasibility research. I encourage Metro Vancouver to leverage existing innovations rather than duplicating work already completed within the ecosystem.

Later the plan also commits to "implement circular business opportunities," and to "collaborate with external organization on circular initiatives, research, and pilot projects". To maximize effectiveness, greater clarity is needed regarding which partners are being prioritized, how collaborations will be structured, and what specific supports Metro Vancouver is prepared to provide. Do these supports include funding, data access, facilities, regulatory support, coordination, promotion, or administrative assistance? This

is what the space needs to scale because demand for these initiatives is already evident: Repair Cafés, for example, consistently operate at capacity, demonstrating strong public interest but limited resources to implement it.

I also note that the plan identifies multi-family residential buildings as high waste generators and opportunistic for implementation of waste diversion, but implementation barriers here are significant and the plan does not seem to acknowledge those. Actions such as 3.5.3 appear to assume willingness from strata corporations, yet in practice these entities are often resistant to installing collection infrastructure or hosting reuse initiatives. It would be helpful to clarify whether Metro Vancouver can play a stronger convening, regulatory, or policy role with property managers and strata organizations.

Lastly, and perhaps most importantly, the plan does not appear to directly address reduction in overall consumption, which is the highest-impact intervention within the waste hierarchy. While diversion, recycling, and circular initiatives are important, they do not substitute for upstream strategies that reduce material throughput in the first place. Without clear actions, targets, or policy mechanisms focused specifically on lowering per-capita consumption, the plan risks emphasizing downstream management over prevention. Strengthening this area would better align the SWMP with zero-waste principles and long-term sustainability goals.

Thank you again for the opportunity to contribute feedback. I would welcome continued dialogue and collaboration to help ensure the SWMP reflects both the urgency of the waste challenge and the readiness of local innovators to support solutions.

Sincerely,
Marcelle Moreira dos Santos
Co-Founder, Dreamstill Technologies

Dear Metro Vancouver Solid Waste Management Team,

Thank you for the opportunity to review the Initial Draft Solid Waste Management Plan. We commend Metro Vancouver for its leadership in advancing a circular economy and appreciate the proposed actions. This approach aligns with the values of the health authorities across Metro Vancouver who recognize climate change and environmental degradation are significant and growing threats to population health. Each health authority in the region has established a planetary health or environmental sustainability strategy that reflects our shared commitment to reducing unnecessary waste and managing resources responsibly (linked in Appendix 1). We see three key themes which would strengthen the current plan:

1. Highlighting the connection between environmental and human health

We see value in explicitly incorporating health as a guiding principle in this revised plan and clearly articulating the connection between proactive waste management and the prevention of climate-related impacts on both community health and the natural environment.

Recognition of the interdependence between climate change and health would complement the collaborative work with First Nations given Indigenous teachings/beliefs linking health and the environment. Furthermore, it is critical that we recognize that climate change and environmental degradation affect disadvantaged populations and communities. A discussion of these inequalities and how the actions in the strategy address these should be included and recommendations for engagements for early connection with the population public health and environmental health departments in the region should be incorporated, to ensure health is a pillar of implementation.

2. Strengthen support for the commercial sector to continue to segregate optimally

The health sector strongly supports the zero-waste hierarchy[1]. Reducing waste at the source decreases the volume requiring management at landfills and the waste-to-energy facility. Given the healthcare sector's substantial waste footprint[2][3], there is an opportunity to highlight ongoing initiatives within health care that align with Metro Vancouver's objectives. Evidence demonstrates that improper waste management can contaminate soil, air, and water[4], underscoring the importance of a robust regional plan[5]. With the Vancouver Landfill expected to operate until 2050, continued support for large sectors, including healthcare, to improve organics segregation will

[1] Previous feedback from the health sector was submitted through the 'Preventing Non-Residential Packaging Waste Public Engagement 2024 (Pages 13 & 328) Available here Preventing-Waste-Outside-the-Home_Written-Submissions.pdf

[2] IPCC, 2022: Climate Change 2022: Impacts, Adaptation and Vulnerability. Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [H.-O. Pörtner, et al.) Cambridge University Press, Cambridge, UK and New York, NY, USA, 3056 pp., doi:10.1017/9781009325844

[3] The *Lancet* Countdown on health and climate change: from 25 years of inaction to a global transformation for public health. Watts, Nick et al.The Lancet, Volume 391, Issue 10120, 581 - 630

[4] Nizami, A-S, et al. 2022, *An overview of the environmental pollution and health effects associated with waste landfilling and open dumping*, *Environmental Science and Pollution Research*, vol. 29, pp. 42539–42555, viewed 17 February 2026, https://pmc.ncbi.nlm.nih.gov/articles/PMC9399006/ (Accessed February 11th 2026).

[5] CMAJ 2023 April 11;195:E518-9. doi: 10.1503/cmaj.1096046

further reduce emissions. Municipality support with Goal 4 of optimizing recycling, would greatly benefit the health authorities as they navigate vendor issues previously flagged with Metro Vancouver. Consequently, preventing and reducing waste will improve local air and quality, reducing 2 million tonnes of CO2 emissions from landfills and 277,877 tonnes CO2 from incineration annually[6][7] demonstrating important public health co-benefits such as lower rates of respiratory illness and other pollution related health conditions.

3. Classification of healthcare waste & clear communication

We ask Metro Vancouver to consider the classification of healthcare garbage as 'specialized waste'[8]. Grouping healthcare waste with asbestos has been flagged by the lower mainland waste management teams in previous engagement sessions with Metro Vancouver as counter-productive to healthcare waste management. This problematic classification creates bias and fear around non-hazardous waste in healthcare.

Thank you for your consideration of our feedback and the opportunity to partake in this engagement. We welcome dialogue with Metro Vancouver on how best to progress in recycling, reuse and overall waste reduction in the health sector. We encourage Metro Vancouver to outline how engagement with the commercial sector, including the healthcare sector, will be structured, and look forward to continued collaboration as the plan advances.

Kind regards,

Robert Bradley
Regional Director, Energy & Environmental Sustainability
Facilities Management (VCH, FH, PHC, PHSA)

Dr. Jonathan Braunstein
Regional Medical Staff Lead,
Sustainability and Preparedness
Fraser Health

Amanda Witter
Executive Director, Transformation and Planetary Health
Vancouver Coastal Health

February 18th 2026.

[6] Metro Vancouver 2020, *Climate 2050: Solid Waste Primer*, Metro Vancouver, viewed 17 February 2026, https://metrovancouver.org/services/air-quality-climate-action/Documents/climate-2050-solid-wate-primer.pdf (Accessed February 10th 2026).
[7] City of Vancouver 2024, *2024 Annual Report: Vancouver Landfill*, City of Vancouver, https://vancouver.ca/files/cov/2024-annual-report-vancouver-landfill.pdf (Accessed February 11th 2026).
[8] Page 39, 6.4.4 of the Initial Draft Solid Waste Management Plan (January 2026).

(Submitted by PTAC committee member Sarah Scanlan, Regional Sustainability Consultant –VCH, FH, PHSA & PHC)

Appendix 1 Lower Mainland Health Organizations Planetary Health Strategies:

Vancouver Coastal Health Planetary Health | Vancouver Coastal Health

Fraser Health Sustainability and Preparedness: Our Planetary Health Strategy

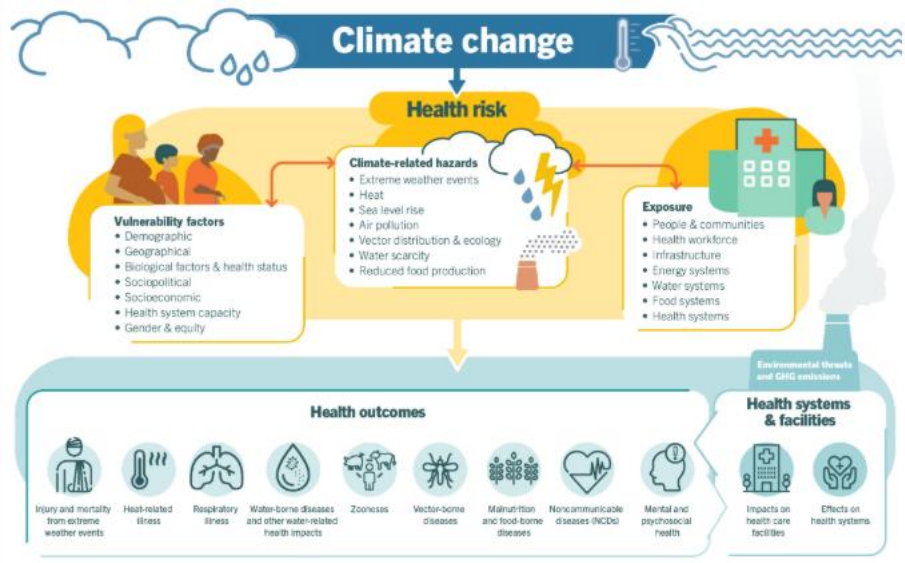
Providence Health Care PHC Planetary Health Strategy 2024-2029.pdf

PHSA; B.C. Renal Planetary Health Strategy Planetary_Health_Strategy.pdf

B.C. Cancer Planetary Health Strategy Info Guide - Planetary Health - Home at BC Cancer

Appendix 2

Impacts of climate change on health (WHO, 2023)[9]



[9] World Health Organization (WHO) 2023, *Climate change and health*, WHO, viewed 17 February 2026, https://www.who.int/news-room/fact-sheets/detail/climate-change-and-health (Accessed February 10th 2026).

Here are the key concerns from a Zero Waste perspective:

1. Use the Zero Waste Hierarchy and definition. A clear peer-reviewed definition and hierarchy will drive progressive action. Eliminate the goals for recovery in favour or more work on reduction.
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.
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. It is neither cleaner than landfills nor cheaper and is a roadblock to reducing waste. It represents a huge risk to the region. Firmly commit to not building or using any new incineration or thermal treatment facilities.
4. **Invest** in zero waste solutions instead 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:
    a. Waste prevention such as cutting unnecessary packaging and preventing food waste.
    b. Reuse and Repair -making it easier so unusable items do not get thrown out.
    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 -include actions to decrease the use of toxic materials as well as the emission of toxic pollution
    e. Enforcing and enhancing existing bans with more inspections, a requirement for clean bags and mandatory source separation.
5. Measure and work to reduce the climate footprint of materials by including consumption-based emissions on the planning and proposed actions.
6. Establish and commit to a timeline for the actions and the associated budget to ensure the plan can be implemented.
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.
8. Spend money wisely and invest in the future- choose solutions that reduce waste without locking the region into expensive disposal systems.

Feedback on January 2026 draft SWMP of Metro Vancouver

There are three components to this feedback. The first are high level concerns with the plan, the second is an endorsement of the framework proposed by Jamie Kaminski and the third is a section with detailed suggestion on the plan sections.

Overall feedback

Here are the key high-level concerns from a Zero Waste perspective. The plan should:

1. Ensure that Zero Waste positioning is reflected more clearly and consistently in how the regional waste system is designed, measured, funded, and enforced in practice. Use the Zero Waste Hierarchy and definition. Add in zero waste language as appropriate throughout the plan (i.e. most parts that mention circular economy). A clear peer-reviewed definition and hierarchy will drive progressive action. Note the plan should highlight the impacts avoided by reduction - biodiversity, habitat loss, soil nutrient loss, air pollution, water pollution, land pollution, etc. (not just GHGs). Eliminate the goals for recovery in favour of more work on reduction.
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.
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. It is neither cleaner than landfills nor cheaper and is a roadblock to reducing waste. It represents a huge risk to the region. Firmly commit to not building or using any new incineration or thermal treatment facilities.
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:
    a. Waste prevention such as cutting unnecessary packaging and preventing food waste.
    b. Reuse and Repair -making it easier so unusable items do not get thrown out.
    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 -include actions to decrease the use of toxic materials as well as the emission of toxic pollution
    e. Enforcing and enhancing existing bans with more inspections, a requirement for clear bags and mandatory source separation.
5. Measure and work to reduce the climate footprint of materials by including consumption-based emissions on the planning and proposed actions.
6. Establish and commit to a timeline for the actions and the associated budget to ensure the plan can be implemented.
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. Report on the metrics suggested in biennial reports

with at least as much as detail as the 2019 report had as well as the additional suggested information.

8. Spend money wisely and invest in the future- choose solutions that reduce waste without locking the region into expensive disposal systems.

Framework

We support this Framework for Metro Vancouver's Next Solid Waste Management Plan. This framework outlines the core elements that must be included in the next SWMP to align Metro Vancouver's stated Zero Waste commitments with how the system is designed, funded, measured, and enforced in practice. It focuses on actions Metro Vancouver can control or directly enable through bylaws, pricing signals, service requirements, enforcement, and targeted investment.

1. Clear Targets That Measure Real Zero Waste Outcomes What the Plan Should Do

The Plan must include clear, measurable targets aligned with the Zero Waste Hierarchy:

- **Sector Specific:** Each sector (Residential, IC&I, C&D) must have its own diversion targets and not only one aggregate target for the region.
- **Waste reduction:** Reduce per-capita municipal solid waste generation by 15 percent by 2036, relative to a 2023 baseline, with interim targets.
- **Zero Waste performance:** Zero Waste targets under this Plan are achieved through waste reduction, reuse, and diversion, with diversion limited to source-separated recycling and composting only. Make it more clear how the goals and actions will help to get to the targets.
- **Disposal reduction:** Reduce per-capita disposal by at least 50 percent by 2036.

2. Measurement, Metrics, and Accounting Framework (Foundational to the Entire Plan)

This section establishes the accounting rules that apply across the SWMP. These rules ensure reported performance reflects real Zero Waste outcomes rather than downstream correction.

2.1 Separate Reporting of Waste Streams

The Plan requires that the following waste streams are measured, tracked, and reported separately:

- Residential Solid Waste
- Industrial, Commercial, and Institutional (IC&I)
- Construction and Demolition (C&D)

C&D waste must never be aggregated with residential or IC&I diversion rates.

2.2 What Counts Toward Diversion

Diversion is intentionally defined narrowly.

Counts toward diversion:

- Source-separated third-party reuse
- Source-separated recycling**,** defined as:

The reprocessing of source-separated materials into new products, materials, or substances for their original or similar purpose, in a manner that displaces the use of virgin materials. Recycling does not include processes that convert materials into fuels, energy, or products used primarily for energy recovery or disposal.

- Source-separated composting or anaerobic digestion

Does not count toward diversion:

● Recycling or composting of materials recovered from mixed waste
● Post-residual sorting
● Stabilization of organics after disposal
● Metals Recovered from Incineration Ash
● Incineration ash incorporated into concrete or other materials
● Combustion or fuel substitution (e.g.: refuse derived fuel, chemical processing of plastics to fuel)

2.3 Treatment of Recovery

Recovery must be reported as disposal because it occurs only after materials have failed to be captured through source-separation. Recovery includes post-residual sorting, recovery of metals from ash, and stabilization of organics after disposal.

Under this Plan:

● Recovery is maximized to reduce environmental harm.
● Recovery is tracked as a diagnostic indicator.
● Recovery is reported as disposal for performance measurement.

Objective: Reduce the amount of recoverable material entering disposal.

2.4 Energy Recovery and Combustion-Based Pathways

All combustion-based management of waste is classified and reported as disposal, regardless of where combustion occurs or how fuel is prepared. This includes waste-to-energy, energy-from-waste, refuse-derived fuel (RDF), and fuel substitution. These pathways do not count toward diversion or Zero Waste targets, and must never be counted as material recovery.

2.5 Stabilization of Organics

Biological stabilization of organics is supported as a pollution control measure where source-separation fails.

However:

● Stabilization alone does not count toward diversion.
● Only source-separated organics processed through legitimate composting or anaerobic digestion pathways count toward diversion.

3. Waste Reduction (Metro Vancouver-Controlled Priorities)

Waste reduction delivers the greatest environmental and financial benefits and relies on tools that Metro Vancouver can directly control through regulation, service requirements, enforcement, and targeted investment.

The Priority actions within Metro Vancouver's control are described in detail below:

3.1 Enforcement-led reduction using disposal bans as a true front-end control

Use disposal bans to prevent recoverable materials from entering the disposal system, not to justify downstream correction.

● Mandate use of clear bags.
● Increase inspections and consequences (linked to Section 6).
● Require repeat offenders to submit a compliance plan with specific corrective actions and timelines.
● Use inspection data to target high-impact generators and sectors for follow-up.

3.2 Multi-family reduction program at scale

Multi-family is a large, controllable opportunity where service gaps and inconsistent standards drive disposal.

- Require organics and recycling service for multi-family with minimum service standards and clear timelines.
- Require building-level performance measures (set-out rates, contamination, and disposal per unit).
- Fund building supports that directly reduce disposal: signage packages, caretaker training, and initial on-site audits.

3.3 Food waste prevention and redistribution enablement

Prevention is of higher value than processing. Metro Vancouver can enable prevention through targeted partnerships and standards.

- Expand support for food waste prevention and redistribution partnerships (best before handling, safe donation logistics).
- Require large generators with high organics volumes to implement prevention practices before relying on organics processing.
- Report prevention results as avoided tonnes and avoided disposal costs.

3.4 Public events and venues: minimum prevention and reuse standards

Large events are visible, controllable, and can set regional norms.

- Require reuse service plans for major permitted events (cups, dishware, and service ware).
- Require organizer reporting on waste generation, separation performance, and contamination.
- Use a simple compliance ladder: education, conditions on permits, then penalties for repeat failures.

3.5 Economic signals that reward prevention and penalize repeated disposal of banned materials

Metro Vancouver can realign incentives through disposal pricing and generator accountability.

- Use disposal surcharges for loads with banned materials or non-inspectable bagging patterns, consistent with inspection protocols.
- Align tipping fee structures to reward clean source-separation and penalize mixed disposal.
- Use generator-facing charges where applicable to shift costs toward preventable material in the garbage stream.

3.6 Track and report avoided waste

Reduction must be visible. The Plan must track avoided waste as a core performance indicator.

- Report per-capita generation, in addition to per-capita disposal.
- Report avoided tonnes tied to specific programs (multi-family supports, event standards, food prevention).
- Publish annual results by sector (Residential and IC&I) so underperformance cannot be masked by C&D.

How to Shift Funding Toward Reduction

Metro Vancouver should establish an Upstream Investment Envelope inside Solid Waste Services and report it transparently.

- Create a dedicated annual envelope for reduction and reuse programs with a minimum

share of the Solid Waste Services budget, increasing over time.
● Fund the envelope through a mix of reallocation from downstream programs, generator levy revenues, and avoided disposal costs as performance improves.
● Tie funding to measurable deliverables: enforcement activity, compliance improvements, avoided tonnes, and sector-specific performance.

4. Reuse and Repair (Core System Components)

Reuse and repair reduce waste generation by keeping products and materials in use at their highest value before they become waste. Unlike recycling, which manages materials after discard, reuse prevents waste at the source and requires intentional system design, regional coordination, and stable support to function at scale. The following actions identify priority areas where Metro Vancouver can strengthen reuse outcomes through targeted investment and enabling policies.

4.1 Regional reuse infrastructure program (hubs and collection channels)

Metro Vancouver should support a network of reuse hubs focused on high-volume categories that drive disposal.
● Bulky goods and furniture capture (reduce bulky disposal and illegal dumping).
● Textiles and household goods capture with clear sorting standards.
● Building materials capture in coordination with municipalities and private operators.
Metro Vancouver can enable this through siting support, partnership agreements, and targeted grants tied to tonnage captured and verified reuse outcomes.

4.2 Repair and refurbishment network scaling

Repair extends product life and reduces waste generation.
● Expand repair events and permanent repair capacity through small grants, space access, and promotion.
● Support refurbishment pathways for electronics and durable goods through partnerships and standards for safe handling.
● Advocating for repair and refurbishment as a key part of provincial and federal regulations.

4.3 Deconstruction and building material reuse enablement

Metro Vancouver can support municipal deconstruction policies by enabling markets and pathways.
● Work with municipalities to standardize salvage expectations where feasible.
● Support aggregation and resale channels so salvaged materials have reliable markets.
● Licensing all C&D material service providers and tracking all material flows from C&D to ensure accountability.
● Track outcomes separately from C&D diversion to avoid inflating Residential or IC&I results.

4.4 Reuse-first procurement leadership and standards

Metro Vancouver should lead by example and normalize repairable and reusable products. Look to the City of Richmond as a local ground-breaking example and learn from it.
● Adopt internal procurement standards favoring refurbished and repairable products where feasible.
● Incorporate the reuse of materials into Metro Vancouver procurement, with a focus on

C&D materials.
● Encourage member municipalities to adopt similar standards and share templates.

4.5 Measurement: track reuse separately

Reuse should be reported as a distinct performance line item, not blended into recycling or diversion totals.
● Track verified reuse tonnage and participation indicators.
● Report reuse separately by sector and program area.
● Use reuse metrics to support funding decisions and program scaling.

How to Shift Funding Toward Reuse

Metro Vancouver should allocate a stable share of upstream funding to reuse and repair as long-term cost control.
● Use the Upstream Investment Envelope to provide predictable multi-year funding for reuse hubs and repair networks.
● Fund only outcomes that are verifiable (items reused, tonnes captured, participation, and reduced bulky disposal).
● Prioritize initiatives that reduce disposal volumes and contamination pressures on recycling and organics systems.

5. Universal Access to Recycling and Organics Services

The Plan must require recycling and organics service for:
● Multi-family residential buildings
● Commercial, institutional, and industrial properties
The plan should also provide support for these changes such as signage, information and technical assistance. Minimum service standards and clear compliance timelines are required to support disposal bans and Zero Waste targets.

6. Strengthened Disposal Bans and Inspection Quality (A Core Zero Waste Delivery Mechanism)

6.1 The Core Problem

Disposal bans rely on inspections, yet current practices cannot meaningfully inspect opaque or non-transparent bags. Bagged waste routinely passes without review, creating a systemic enforcement loophole that undermines both effectiveness and fairness.

6.2 Required Changes

The Plan must close the bagging loophole and raise inspection quality through:
● **Inspectability as a condition of disposal:** require loads to be reasonably inspectable using transparent bag requirements, bag limits, or loose loading requirements where appropriate, and treat non-inspectable loads as presumptively non-compliant.
● **Standardized inspection protocols:** random bag opening using approved safety procedures, designated inspection areas, and clear thresholds for rejection, surcharge, or follow-up.
● **Clear responsibility:** generators ensure compliance and inspectability, haulers flag problematic loads, and disposal facilities enforce outcomes.
● **Strategic use of data:** track inspection outcomes by sector and material type, report publicly, and use results to target enforcement and service gaps.

7. Disposal and Infrastructure Alignment

The SWMP must align infrastructure planning with waste reduction by:

● Committing to the phase-out of the Burnaby incinerator within the planning horizon.
● Avoiding new "must-run" disposal capacity.
● Using flexible landfill capacity for true residuals, so the region pays for what it needs as disposal declines.

Additional Recommended changes by plan section:

Vision: revise to: A thriving, sustainable region where resources are conserved and not destroyed or wasted.

Principles:
1-6 as is but add a top one of: striving to reach zero waste.
Edit 7. to Transparency about what happens to garbage, recycling and organics and the impacts of those materials and systems.
Add

8. Minimize use of toxic and harmful materials and output of pollution.
9. Precautionary Principle

Hierarchy -use the ZWIA one, eliminate goal 5, add a last goal to eliminate the use of incineration/waste to energy as well as the burning of clean wood waste.

Targets
Climate goal**:** Make the closure of the incinerator part of the path to climate neutrality; this would save at least 130,000 t CO2e annually (270,000 tonnes if full carbon accounting for biogenic emissions are included) and aim for 0% organics disposed in landfill by 2036.
There should be a strong emphasis on reducing emissions and not a reliance on carbon offsets (the effectiveness of which have been questioned).

There should be a for total waste (so if population goes up, there is a need to work harder to meet the goal) as planetary boundaries are finite, regardless of population.

Food waste should also have its own metrics, goal and reporting. Keeping organics out of the waste stream is necessary to achieve Metro Vancouver's climate goals. The target should be aligned with the SDG 12.3 target -50% less food waste by 2030

Target for % of loads fully inspected (as in clear bags or opening opaque bags) -to 90% in 10 yrs.

Secondary Metrics
Add the following:
Rethink

- # partnerships
- # businesses certified Zero Waste
- Economic value of circular economy
- Funding and investment available for ZW/CE initiatives

Reduce

- # municipalities with event permit zero waste requirements
- # municipalities with zero waste plan requirements for business licenses
- # engagements to support ICI transitions

Reuse

- Tonnes reuse for C&D materials (separate)
- # repair options and awareness
- # reuse programs (encourage all groups to register their programs, support new ones, have RCBC share where they are)
- #refilleries -same as above
- Growth in number of share, repair and reuse assets
- Amount of reuse options and awareness
- # repair shops -same as above # municipalities with event permit zero waste requirements

Recycle

- # municipalities with full organics collection
- # municipalities with full curbside collection
- % of MF buildings with full Recycle BC service
- % of MF buildings with organics service
- Organics recycling participation rate
- % of ICI with full three streams collection
- # municipalities with mandatory three stream collection or % of region (when MVRD implements)
- Amount composted by sector
- % contamination recycling
- % contamination organics

Recover

- remove existing one as inaccurate representation of what diversion is,
- add what materials are recovered and
- # actions taken to move from recovery to higher levels of the hierarchy

Dispose

- # Actions taken to understand why something was wasted
- Remaining incineration capacity (years and tonnes left until a rebuild/major retrofit is required)
- GHG from transport of waste (from collection location to end fate)
- GHG from disposal facility by each facility (include both biogenic and non-biogenic), show % of each.
- GHG reductions associated with solid waste and consumption
- Show energy input and wasted at each facility
- Clear costs of disposal per tonne by disposal methods and not including transfer station costs, only transportation from there to landfill or incinerator (which again should be separate by each location)
- Clear costs for incinerator maintenance (capital and anything in the contract)
- Do not show homes powered by incineration as this is misleading
- % loads enforced
- % loads in clear bags
- GHG - consumption-based emissions, if showing recovery for fuel, need to show what was lost by burning it.
- Wildlife garbage interaction statistics
- Illegal dumping statistics
- Waste composition (at least every three years and by sector)
- Diversion rates (for the whole community and by sector) (as defined above)

- Total waste disposed (for the whole community and by sector)
- Total discards generated (for the whole community and by sector)

Overall commit to reporting -annual and biennial, include % spend by hierarchy level and actions conducted focused on sectors

Alignment

Provincial

Add other provincial work such as single use plastics, expanding EPR, examining non-residential packaging and paper and improving organics collection and processing.

Note the provincial guideline says very clearly that there is no need to align to the provincial hierarchy and in fact many do not (e.g. .RDN, City of Victoria, City of Vancouver, etc.). Suggest removing that paragraph and using the Zero Waste hierarchy instead.

Metro Vancouver

For Climate 2050 -Do not use offsets, instead ensure the plan is developed to eliminate emissions which should: 1. reduce waste, 2. close the incinerator, 3. change to electric or LFG transport, 4. Plan that the next SWMP examines Material Recovery Biological Treatment (MRBT) for remaining waste.

For Liquid Waste -do not plan to burn biosolids. Look to make the biosolids cleaner by reducing contamination at source as well as post collection treatment.

Actions

Add the following:

- License haulers and all processing facilities; develop accountability systems including data reporting and verification (especially for C&D)
- Promote renovation and retrofit options versus newbuilds
- Create a municipal template and toolkit for building removal bylaws that include house moving and deconstruction
- Collect and share data on consumption based emissions (1.4)
- Map out assets that can be shared -community reuse, repair and sharing (Squamish is working on it, Share Reuse Repair has some for the Lower Mainland and Portland, OR is a good example.) -can do this in partnership with RCBC. (goal 2)
- For all actions that say advocate, also add implement where feasible (example 3.1.1)
- Encourage reuse of additional items, encourage the addition of more material in the SUP bans, systems to reduce use of bottled water (goal 3)
- Strategy 3.2 is in the reuse section so it needs to highlight requirements for programs to redesign, reduce, offer repair, longer life spans, supporting reuse, resale, refurbishment, collection of parts, parts availability, etc.
- 3.2.1 include C&D materials
- 3.3.1 and lead by example in MV and municipal projects.
- 3.3 also Set up systems to address costs of material storage (using public land or providing support)
    - Open land uses to recycling and facilitate land for receiving facility use with industrial rezoning and cost reductions
    - Create an environment to increase processing capacity and business opportunities for C&D resources
- 3.3.3.2 add implement, including use of incinerator land for a C&D reuse hub.

- 3.4.2 consider EPR program funding as in France
- 4.1.1 and implement; also support federal initiatives for more clear labelling and reporting
- 4.1.1.1 and the phaseout of non-recyclable or hard to recycle materials or contaminants
- 4.2 add implement a book recycling collection and processing system; implement a furniture collection and processing system.
- 4.2.2 and develop regionally-owned organics processing infrastructure
- 4.2.3 start a wood waste reuse innovation hub instead of burning it; better to phase out plastic-lined paper product and switch to reuse
- 4.3 and for institutions as well
- 4.6.1 and provide technical assistance /coaching
- 4.7.1 and organics facilities
- 4.8.1 mandate use of clear bags
- 4.8.2 instead mandate source separated collection like RDN
- 4.8.4 don't explore, commit to inspect 90% of loads by 2030
- Goal 5 this should not be a goal; the recovery of materials should happen but not for energy and not to direct staff time to this at expense of action above. Eliminate this section, if it still exists -only list ways to recover materials (not energy) and concentrate on getting materials back that should not have been used such as toxics like asbestos and mercury
- 5.1.3 note use of ash is not beneficial but instead a way to spread toxic materials that will be almost impossible to track. It represents risk
- Goal 6 need section for disaster debris (perhaps incentivize disaster preparedness to preserve both life and property; Work with organizations that make decisions during disasters to prioritize waste minimization; Develop regional strategies for managing waste from natural disasters and land use changes)
- 6.1.1 add work with CoV for inspecting almost all loads, and work to decrease the amount of landfill cover and other non-waste materials to the minimum required
- 6.1.2 change to committing to phase out the waste to energy facility by 2030 (and then no longer using waste to energy or incineration by any name). Failing that, commit to best in class pollution emissions levels and testing. Also commit to comprehensive testing for dioxins around the facility overseen by a committee including health authorities, community groups, environmental groups, and local First Nations. Definitely no "promotional tours". Stop the connection to district energy and instead support a truly renewable source of energy for district energy.
- 6.1.3 replace with explore use of other landfills as needed until the waste levels are reduced, ensuring they meet the highest environmental standards.
- 6.2 same as 6.1.3
- 6.3 delete this and commit to not using thermal treatment of waste, including at cement kilns
- 6.3.2 advocate for provincial hauler licensing and data reporting
- 6.4.4 this is regular waste. Instead work to educate the staff and any others on the nature of hospital waste versus biomedical waste (as defined by CSA). It should go in the regular systems. Any issues will be identified through the increased inspection of all loads
- 6.6 add a strategy to address wildlife attractant management (type of bins, timing of set out); also add advocate for litter cleanup to be included as part of EPR program responsibility (like in France)
- Add 6.7 develop ways to increase implementation of pay as you throw

- For all actions, make 10 year timeline and show how they will evolve from testing, encouraging and piloting to revising, implementing, rolling out solutions, partnering, regulating , enforcing (example 4.5.1, 4.6.1.2)

Metro Vancouver's regulatory role
The RDN has proven it is possible for a regional district to be empowered to enact bylaws at the generator and property level.

Example Future Regulatory Enhancements
It is incredibly frustrating that in the over 6 years since the Board committed to renewing the SWMP, Metro Vancouver did not use this time to engage and develop the regulatory enhancements as part of its plan development process. The plan should commit to enacting these rather than just have them as examples. In addition, a reduced disposal ban surcharge for collectors with minimum requirements will just create loopholes and should not proceed.

An additional consideration should be collaborating with neighbouring jurisdictions on regulation.

Recycling and Waste Centre priorities
Table 5 -first bullet add in *Reuse and* recycling before the scale at all facilities
Commit to not using incinerator ash in construction
Look to add options for transit users (not just about drive times)

Contingency Disposal
Should not reference cost unless willing to share actual calculations as misleading.

Future Disposal Capacity
Commit to conducting a residual disposal needs assessment based on the phaseout of the incinerator, a commitment to no thermal treatment for future disposal, ambitious zero waste targets and suitable procurement processes for any external landfills. Use this to help motivate the citizens and organizations to reduce their waste.

Table 6 criteria
Economic should also include opportunity cost, future capital costs
Environmental should also include requirements for comprehensive testing and monitoring of all pollutants.
Regulatory compliance -weak as obviously need to meet regulations. Should be a leader as in "meet or exceed strongest environmental standards globally"
Resource use -delete "energy generation and use…" as will always waste more energy than it took to make the items so should not be a focus, instead look at the potential to understand what remains in the waste and why and ability to decrease the waste; ability to inspect loads, enforce bans, etc.

Financial Overview
Recommend planning to change to have some costs paid by taxes as waste decreases (i.e. plan for success) as otherwise may be hard to fund the ongoing landfill and recycling/organics infrastructure as waste decreases.

Table 7 - Do not include this if not making the full spreadsheet on how this was calculated available as misleading and unproven.
Also note the recycling costs should not be quoted unless also noting how much has been recovered under EPR program or material sales.

All capital costs recent and future (at least next ten years) should be clearly mapped out.

Note comparison to other cities tipping fees is irrelevant unless also comparing services, ambition level and success rate, and other revenue sources (such as taxes, etc.). Also note that none of these are in BC which has a very different regulatory regime to these other jurisdictions.

Regional District Collaboration
The sentence "Waste-to-energy continues to be a cost effective and environmentally responsible method to manage residual garbage, and the facility's contributions of nitrogen dioxide, fine particulates, and anthropogenic (human caused) greenhouses gases are less than 1% of regional emissions" should be removed. All arguments for its cost effectiveness have not been proven. The WTEF is one of the top 25 point sources of GHGs annually and a quick look at the budget shows it will cost as much or more for the WTE facility to manage 25% of the waste than for the other 75%. Dilution is not the answer to pollution so the % of one point source against whole categories of polluters is not relevant. What matters is that this very large source of pollution could easily be eliminated. And that this would then show collaboration with a neighbouring regional district which may open the door to partnership on actual zero waste initiatives.

Risk Analysis
A risk assessment should be done on the continued use of the incinerator from a financial, public health, environmental health, regulatory and pollution mitigation perspectives. This should be done with oversight from independent relevant organizations.

Plan Monitoring
Commit to releasing all consultants' reports (including past ones like the 3Rs study, those done on Multifamily, ICI and C&D and the incinerator condition assessment).

Glossary
Diversion -Add one for diversion which is materials discarded but processed through recycling, composting or anaerobic digestion (plus composting).
Recycling -must exclude use for energy (example refuse derived fuel, burning clean wood waste)
Recover -eliminate energy part to match Zero Waste Hierarchy. Note recovery of materials from unsorted waste that get recycled are counted as recovered, not recycled.
Zero Waste -use ZWIA definition.

PTAC Member Comments on the Draft Solid Waste Management Plan

I appreciate the opportunity to provide comments on the draft Solid Waste Management Plan (SWMP). Overall, I do not consider this to be a bad plan; however, I do consider it to be a conservative one. Given the scale of the stated objectives, particularly with respect to climate commitments, I do not believe the current draft is sufficiently ambitious or outcome-driven to deliver the results Metro Vancouver has set for itself.

A plan of this nature should ultimately drive action. In its current form, the SWMP often reads more like a framework or a plan to make future plans, rather than a document that clearly defines what will be done, when it will be done, and what impact those actions are expected to have. My comments focus on four structural gaps that, in my view, materially limit the effectiveness of the plan: (1) the lack of clear linkage between the SWMP and other Metro Vancouver plans, particularly Climate 2050; (2) the absence of clearly defined actions with targets and impacts; (3) an over-reliance on source separation without corresponding enforcement mechanisms, financial drivers, or contingency strategies; and (4) the lack of a clear accountability framework tied to outcomes and cost effectiveness.

1. Linkage to Other Metro Vancouver Plans Is Stated but Not Explained

The draft SWMP does a good job identifying the various Metro Vancouver plans and strategies that are connected to solid waste management, including Climate 2050, air quality management, and the Regional Growth Strategy. However, the plan largely stops at listing these connections and does not explain how the SWMP operationalizes or advances the objectives set out in those other documents.

A clear example of this gap is the relationship between the SWMP and Climate 2050. Climate 2050 explicitly states that future actions to reduce and offset emissions from solid waste disposal are not included in the Climate 2050 primer, but instead are identified within the Solid Waste Management Plan, with the goal of achieving carbon neutrality for solid waste disposal by 2050. This places a significant responsibility on the SWMP.

However, the draft SWMP does not clearly articulate how its strategies and actions move Metro Vancouver toward that carbon neutrality goal. If carbon neutrality is the objective, then ultimately landfilling and incineration must be eliminated or reduced to near zero. The plan does not clearly describe how Metro Vancouver transitions from today's system to that end state, nor does it define what "zero waste" looks like in practical, operational terms.

I would expect to see a clearer narrative along the lines of: where emissions from solid waste disposal stand today; where they are projected to be without the implementation of this plan; and what measurable impact the SWMP is expected to have on emissions, diversion, and disposal over time. Without that, it is difficult to understand how this plan supports Climate 2050 beyond broad alignment statements.

This lack of clarity also creates internal tension within the plan. For example, Strategy 6.3 states that Metro Vancouver will explore additional long-term disposal capacity if required. While it is realistic to acknowledge that disposal will continue to play a role in the near term, the plan does not explain how ongoing landfill or incineration capacity aligns with a stated objective of carbon neutrality by 2050. The trade-offs between short-term capacity needs and long-term climate commitments need to be explicitly addressed.

2. A Plan Requires Defined Actions, Targets, and Impacts

Because this is a plan, it should clearly define actions. In its current form, many strategies and actions are described at a high level, but without clearly defined outcomes, timelines, or performance targets. Without those elements, the SWMP risks becoming a plan to develop future plans rather than a document that drives measurable change.

For key actions, I would expect to see clarity on what will be implemented, what the expected impact is, and how success will be measured. This includes targets for waste reduction, diversion, and emissions, as well as interim milestones that allow progress to be tracked over time.

Defining actions in this way is especially important given the ambitious goals referenced elsewhere, such as carbon neutrality. Without clear actions and associated impacts, it is difficult to assess whether the plan is realistically capable of delivering on those commitments.

3. Heavy Reliance on Source Separation Without Enforcement, Financial Drivers, or Contingency

The SWMP places significant emphasis on source separation, which I fundamentally agree with. Source separation is essential and should remain the primary strategy. However, if the plan relies this heavily on source separation, it must also be more explicit about enforcement mechanisms, minimum standards, and financial incentives or penalties that drive behavior change.

Much of the language in the plan focuses on collaboration, encouragement, and support. While these approaches are important, they are generally insufficient on their own to deliver consistent, region-wide outcomes. For example, Action 2.1 refers to collaborating with businesses and institutions to reduce waste at the source, but does not clearly define minimum requirements such as mandatory three-bin systems or standardized separation practices.

Similarly, Action 4.4 refers to making recycling easier by improving convenience, but does not clearly state that all Metro Vancouver residents should have access to a three-bin system, nor does it address consistency in what materials are accepted across drop-off centers. I am also missing a clear application of the polluter-pay principle. In my view, recycling and organics diversion should be free or low-cost, while disposal should become increasingly expensive. Financial signals are among the strongest tools available to influence behavior.

In addition, I believe the plan needs to acknowledge a practical reality: source separation remains a major challenge in multi-residential housing across North America. Metro Vancouver is not unique in this regard, and the plan should not assume perfect participation or outcomes. While source separation should remain the primary pathway, the region also needs an insurance policy.

That insurance policy means continuing to explore and evaluate other treatment and recovery options for residual waste, particularly for streams that are difficult to separate at source. This should include learning from other jurisdictions and working with other communities that are facing similar challenges. A resilient system recognizes that not all waste will be perfectly separated and plans accordingly.

4. Accountability and Outcome-Based Reporting

The final and most significant gap, in my view, is accountability. The plan proposes the creation of a Plan Monitoring Advisory Committee, which is a constructive step. However, the plan does not clearly define how success or failure will be measured, reported, or acted upon.

Metro Vancouver has set ambitious targets in the past, yet those targets are never met. A credible plan should explicitly describe how accountability is enforced when outcomes fall short. At a minimum, reporting under the SWMP should clearly answer the following questions: what was the plan; where are we today; did we meet our targets; if not, why not; what corrective actions are required; and what impact those actions are expected to have.

I also believe actions under the plan should be evaluated based on outcomes and cost effectiveness, not just activity. For example, if an education campaign costs one million dollars per year but only reduces waste by a small amount, it is reasonable to question whether that action should continue or be redesigned. Benchmarking actions based on cost per tonne diverted or emissions reduced would significantly strengthen accountability and decision-making.

Closing

In summary, my comments focus on four areas where I believe the draft SWMP could be materially strengthened: clearer linkage and impact relative to other Metro Vancouver plans, particularly Climate 2050; clearly defined actions with targets and impacts; stronger enforcement, financial drivers, and contingency strategies to support source separation; and real accountability tied to outcomes, targets, and cost effectiveness.

Addressing these gaps would not require a complete rewrite of the plan, but it would significantly improve its credibility and its ability to deliver on Metro Vancouver's stated goals.

William Selten

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