

Here is the Cement Association of Canada's response to Metro Vancouver, outlining the issues that the Generator Levy will cause for cement companies that burn garbage to make their cement.



November 23, 2017

Carol Mason
Chief Administrative Officer
Metro Vancouver
4730 Kingsway
Burnaby, BC
V5H 0C6

Re: Metro Vancouver's New Waste Generator Levy

Dear Ms Mason,

We write to you on the topic of the Metro Vancouver's new Waste Generator Levy, being implemented by way of Amending Bylaw No. 308, 2017. Along with our industry members, Lafarge Canada Inc. and Lehigh Hanson Materials Ltd. we have some concerns with the potential impacts of this bylaw. As we have previously discussed, the cement industry is currently using selected non-recyclable wastes as alternative and lower-carbon fuels. This allows for the reduction in the amount of fossil fuel that is required in the cement manufacturing process, and consequently a reduction in greenhouse gas emissions.

Our specific concern is the financial provision in the bylaw which will require every waste generator to pay Metro Vancouver \$40 per tonne of municipal solid waste (residential, commercial and light-industrial), regardless of where that waste may ultimately be directed. There are several firms currently exploring the opportunity to process and prepare alternative fuels from selected fractions of municipal solid waste that is now either being landfilled or disposed at Metro Vancouver's Waste-to-Energy plant. These firms are planning to establish local processing facilities that will be able to produce materials to be used by the cement and other industries as alternatives to higher carbon-intensity fossil fuels such as coal and natural gas.

However, this generator levy appears to support the status-quo – continued landfilling and incineration in the region. Instead, we should indeed continue to support waste reduction and source-separated recycling, while at the same time also providing incentives for business to help divert institutional, commercial and light industrial (ICI) wastes away from landfill. Pulling out higher calorific value materials that can not be recycled for use as alternative fuels in existing facilities is preferable to landfilling them, both from a resource and a greenhouse gas perspective. The new \$40 a tonne fee on all waste does not help to foster the innovation and investment that is needed to reduce the amount of waste that we dispose as a society.

The generator fee and bylaw will establish a financial dis-incentive or penalty to those firms that are considering diverting waste from disposal. As currently set out, this bylaw will result in an effective \$40 surcharge (in 2018) to such businesses. We bring this issue to your attention and recommend that due consideration be given to revising the bylaw accordingly in order to address this anomaly.

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www.zerowaste.com/ica



**Metro Vancouver's New Waste Generator Levy
Cement Association of Canada**

Our common objective and top priority should be to reduce waste, and follow that with reuse and recycling. However, once those first 3Rs have been exhausted, we trust that opportunities for our industry to collaborate with Metro Vancouver and local businesses to help divert waste from landfill disposal and reduce greenhouse gas emissions would be supported and not incur undue financial penalties.

We look forward to your response. Please let us know if you wish to discuss this in further detail.

Yours truly,

A handwritten signature in blue ink, appearing to read 'Ken Carrusca', with a long horizontal flourish extending to the right.

Ken Carrusca, P.Eng.
Vice President, Environment and Marketing (Western Region)
Cement Association of Canada

cc: Honourable George Heyman, Minister of Environment and Climate Change Strategy

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~~Zero Waste Committee~~