

Below is Lafarge's response to Metro Vancouver, outlining the same issues as Lehigh, regarding using waste energy for making cement.

**ATTACHMENT 1**

November 22, 2017

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

Dear Carol,

Re : Metro Vancouver's New Waste Generator Levy

The Lafarge Richmond Plant has been working to reduce the carbon footprint of its cement plant operations over the past 10 years through co-processing, the process of utilizing waste as a thermal energy source or raw material. We have worked together with Metro Vancouver on permitting low carbon fuels (LCF) for our kiln for many years and are concerned about Metro Vancouver's new Waste Generator Levy, being amended by way of Amending Bylaw No. 308, 2017.

Lafarge respects the regional waste hierarchy and seeks to use its assets to be a part of the solution. The plant is planning on breaking ground for a new Alternate Fuel System in 2018 that will give the plant the ability to co-process 50% LCF into the cement kiln. The LCF is comprised primarily of non-recyclable waste byproducts; waste that does not have an existing or economically viable recycling outlet and is bound for landfills.

Achieving a LCF substitution of 50% will allow Lafarge to divert approximately 100,000 tonnes per year of waste from local landfills. With an ever growing population, co-processing of waste is the future to waste management and waste disposal because the direct benefits can be seen in the reduced need for incineration or landfilling of waste. Achieving a 50% substitution will also significantly reduce the greenhouse gas emissions from the cement manufacturing process.

The \$40/tonne generator levy for municipal solid waste (MSW) does not discriminate and is applied across to all businesses, whether or not they are diverting waste from landfills. Lafarge's cement kiln is uniquely positioned as an option for recovering the combustible fractions of MSW once all recycling options are exhausted. We feel that this levy would have a stifling effect on the future development of higher uses for MSW and encourage continued landfilling.

We bring this issue to your attention and recommend that consideration be given to revising this bylaw accordingly in order to account for preparation and consumption of MSW in cement

LAFARGE CANADA INC.
Richmond Cement Plant
7611 No. 9 Road, Richmond, BC V6W1H4
www.lafarge.ca

Zero Waste Committee



kilns. Reducing waste is also a top priority for Lafarge, and know that we are poised to play a part in the future of waste management in the region.

We look forward to hearing from you on this matter.

Sincerely,

A handwritten signature in black ink that reads 'Stephanie Voysey'.

Stephanie Voysey, P.Eng, EP
Environment and Public Affairs Manager, BC

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