

Summary of Consultation Comments

Industrial Non-Hazardous Waste (INHW) Landfills Code of Practice: Intentions Paper

Prepared for:
Environmental Management Branch
Ministry of Environment

Prepared by:
C. Rankin & Associates
Victoria BC

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Section A: Background to the Consultation Process and Responses Received

Introduction and Background to the Consultation Process

This report provides a summary of comments received as part of the consultation process for a code of practice (minister's regulation) for industrial non-hazardous landfills under provisions of the *Environmental Management Act* (EMA) and the Waste Discharge Regulation (WDR). The EMA and WDR were brought into force in July 2004. Under the legislation, introductions of waste from identified prescribed industries, trades, businesses, operations and activities require authorization (e.g., permit or approval) from the ministry. The proposed code of practice would apply across the entire province and can replace individually issued permits (and operating and/or closure plans) as the primary regulatory instrument for regulation of specified discharges to the environment.

An intentions paper and response form were posted for public review and comment on the ministry's website (www.env.gov.bc.ca/epdiv/ema_codes_of_practice/index) in May 2006. The intentions paper provided a summary of the ministry's mandate and objectives, background information, contents of the proposed code, and information on the development of best management practices and assuring compliance. The response form set out discussion issues and questions in relation to the ministry's intentions.

This document has been prepared for the Ministry of Environment by C. Rankin & Associates, contracted by the ministry to independently receive, compile and review comment on the proposed code of practice. The summary does not reflect the ministry's position on any issue. It provides a synopsis of the responses that are being reviewed by the ministry in considering development of the code – without specific attribution, except to the extent required to provide context for the comments. The summary follows the headings and questions contained in the ministry intentions paper and response form – with synoptic and detailed sections, as well as general, process related and supplementary comments from respondents.

All detailed comments have not been included in this document – but have been compiled as part of the comprehensive documentation of responses being reviewed by the ministry. All comments and references submitted through this process, through independent submissions and through direct consultations with stakeholders, will be reviewed and carefully considered by the ministry in developing the code of practice.

Description of Responses Received

Eleven responses were received (by e-mail, fax and attached file) by the end of July, 2006 and have been reviewed for this summary of consultation comments. About half of the respondents identified themselves as involved in industries or consultancies associated with industrial landfills (as operators, environmental industry consultants or industry associations). Other respondents included representatives of regional and local governments and First Nations. Responses received from First Nations noted process and information points and did not contain substantive comment on the content of the intentions paper.

Many of the responses included specific and detailed comment and recommendations for the ministry to consider. This summary of consultation comments attempts to capture the tenor and content of comments through summarization and specific excerpts from representative submissions.

Section B: Comments on Discussion Issues

This section contains a detailed summary of responses to questions posed in the response form. This summary reflects the range of comments received, as well as excerpts of individual submissions with specific advice or recommendations. Direct excerpts from submissions are included in quotation marks (“ ”) and square brackets ([]) indicate inferred or contextual terms. The complete set of responses and submissions received through the consultation process has also been compiled and passed to the ministry for detailed review and consideration.

Discussion Issue 1: Scope of the proposed code, prohibited materials and definitions

The ministry proposes that the code of practice apply to “wood waste landfills.” Waste types in such landfills might include wood waste from sawmills and log sort yards, ash from wood residue incinerators and authorized open burns, dredgings of wood waste, asbestos waste that has been deposited in accordance with the Hazardous Waste Regulation and inert waste. The code would apply to all new industrial non-hazardous waste landfills of types specified in a schedule, as well as to “significant expansions” of existing permitted landfills and those where the owner has chosen to register under the code. The code would not apply to a commercial landfill accepting waste generated by others, open burning of wood waste at a landfill or to a landfill after discharge had ceased and the landfill has been closed in accordance with regulations.

Question 1.1: Do you believe that the scope of the proposed code of practice (focusing on wood waste landfills) is appropriate? Do you have any comments or suggestions regarding the regulation of wood waste landfills under the proposed code

Many of the respondents noted that as the proposed code of practice would apply to a range of industrial landfills (e.g., logging, wood manufacturing, pulp/paper, oil and gas, mining and newsprint), a “scheme” or set of “schedules” would be appropriate as a regulatory framework (rather than a single common code or regulation). Several respondents suggested that woodwaste landfills, and in particular landfills associated with coastal logging operations in remote locations, pose a low risk to human health and the environment – hence should be subject only to a “simplified results-based regulatory framework.” One respondent, for example, recommended that use of “the Schedule process [by the ministry]...would be a more practical approach than using a ‘Best Management Practices’ document as has been suggested in the intentions paper.”

Several respondents commented on the parameters for “significant expansion” under the proposed code, for example: “a larger expansion [than 10% of the landfill capacity] could occur without increasing the environmental risk on many existing sites”; and “the definition of ‘significant expansion’... [should] be modified to exclude landfills experiencing one-time increases in the quantity of waste.”

Other specific comments included:

- “The code must include specific language on siting of these landfills – they should not contravene zoning/land use and related bylaws which are under the purview of the local government”;
- “Ash from wood residue incinerators is an approved waste type [although the COP intends to exclude landfills operated by pulp mills]... most pulp mills operate waste wood incinerators and landfill the ash there from – should these operations not be included under this COP?”;
- “It would seem inappropriate and unnecessary to permit the disposal of asbestos waste in such landfills regardless of whether such disposal is done in accordance with the Hazardous Waste Regulation – similarly, the disposal of shop, office and food waste should not be permitted”; and
- “All existing Permits [should] be converted to the COP within a one year period – existing landfill operators should be spared, however from the requirements under Section 4.2 B, C and Section 4.3 C, D.”

Question 1.2: Do you believe that it would be appropriate to identify a minimum size (i.e., based on volume of the landfill) below which specified provisions of the code (e.g., registration or some elements of the registration requirements) would not apply? If Yes, which provisions, what is your rationale and what figure would you recommend as a minimum size? If No, what is your rationale?

Respondents who felt that there should not be a minimum size below which provisions of the code would not apply noted that: “due to the nature of the activity – landfilling – there will be impacts to the receiving environment [regardless of the size of the landfill];” and “adequate controls and provisions would need to apply to all operations to ensure human health and environmental safeguards are in place.” Another respondent commented that “small woodwaste landfills (0.5 ha or less) should be subject to simplified requirements – those in remote locations should be allowed to operate under a simplified framework that focuses on watershed protection.”

Question 1.3: Do you have any comments or suggested additions or deletions from the proposed list of prohibited materials? What are the reasons for your suggested additions or deletions?

Respondents who commented on this topic generally provided specific suggestions for the ministry to consider. Comments, for example, included:

- “Absolute prohibition of sewage residuals may prevent the possibility of using this material, combined with woodwaste to create a final cover – the term “un-composed sewage residuals’ could be used instead – use of sewage residuals, combined with wood fines and boiler ash may make a viable organic material for vegetative growth after a landfill is closed”;
- “Rather than stipulate the types of materials that are prohibited from disposal, the code of practice should instead list types of waste that are permitted – anything that is not expressly listed would, by exclusion, be prohibited from disposal”;
- “The scope of the code [should] include all non-hazardous wastes produced by the forest industry, not just woodwaste – as a minimum, we believe that a second schedule of wastes should be quickly developed and included after the code is completed – that additional schedule should include:
 - Woodwastes from sawmills, log sorts and pulp and paper mills
 - Ash from boilers and authorized open burns
 - Dredgings of woodwaste, sand, gravel and rock
 - Mineral soils and sediments from stormwater collection and river water treatment systems
 - Inert Waste – cured concrete, asphalt, brick/masonry, ceramic glass, stainless steel/aluminum
 - Non Hazardous lime wastes – lime, grits and dregs
 - Non Hazardous bagged asbestos
 - Primary and secondary pulp and paper mill sludges containing no free liquid
 - Non recyclable construction/demonolition debris – asphalt, concrete, fiberglass, metals
 - Waste treated lumber and damaged railway ties”;
- “The landfilling of products defined under the Recycling Regulation should be a prohibited practice – any location sufficiently developed so as to have a requirement and be able to construct and operate a landfill will find the means to recycle such products ‘feasible’.”

Question 1.4: The proposed code defines landfill and inert waste. Do you have any comments regarding these suggested definitions?

Specific comments in response to this question included:

- “We suggest that a significant expansion should not include special circumstances such as a one-time increase in the quantity of the landfill”;
- “Inert waste should be defined more clearly to include plastics”;
- “Landfills should not include temporary or long-term storage of chips, hog fuel, sawdust that is or will be utilized on an ongoing basis by the manufacturing operation or for alternate use such as composting or biofuels”; and
- “The definition of inert waste [should exclude] contaminated soil as defined under the Contaminated Sites Regulation of B.C.”

Discussion Issue 2: Registration and Notification

The proposed code of practice contains **prescribed registration requirements** – including site investigation, waste characterization, total capacity and annual discharge rate, design and operations plan, closure plan and consultation documentation.

Question 2.1: In your opinion, are the proposed registration requirements for industrial non-hazardous waste landfills adequate and appropriate consistency with the standards and guidelines described in the intentions paper? Do you have any comments or suggestions about the registration process?

Several respondents commented that “provisions for a practical approach [to enable] existing landfills [to register under the code]” are needed. Suggestions for the ministry included: “allowing a transition period from the registration time of existing landfills to come into compliance with Code requirements, where it is possible and reasonable for them to do so”; and “an approach that allows existing landfill permit requirements to be ‘grandfathered’ if registered under the Code – the Code then would apply only to aspects of the landfill that are not permitted, such as closure requirements.” Another respondent suggested incentives to encourage registration of existing sites, such as “disposition of liabilities.”

Additional specific comments included:

- “Landfills that have been closed under the Act (i.e., ... in accordance with their permit) [should be explicitly exempted from the code]”;
- “Annual fees should be based on actual volumes of ‘waste materials’ and not include inert soils used to cap deposited wastes... we encourage MOE to find the means to reduce fees in the future”; and
- “New Landfill[s] – notification period is currently 30 days, we suggest it remain at 30 days.”

Question 2.2: The proposed code will require notification of local governments within whose boundary a proposed landfill is or will be located, prior to submission of a registration. In your opinion, are the proposed notification requirements for industrial non-hazardous waste landfills adequate and appropriate?

One respondent noted “a number of concerns regarding notification of the proponent to the local government” in the form of questions for the ministry: “Is the notification in addition to an existing Approval issued under a Regional Solid Waste Management Plan? What mechanism is there for a local government to object to the operation of the landfill? What mechanism is there for notification and comment or opposition to the landfill operation by members of the public?”

Question 2.3: Do you agree that only local governments need be notified, on the understanding that anything other than environmental protection cannot be regulated under EMA and land use issues are the responsibility of local government? If you answered No to the previous question, what other persons or agencies do you believe should be notified? Do you have any comments or suggestions for the ministry regarding notification requirements for industrial non-hazardous waste landfills?

Several respondents commented that they understood or “accept[ed]” requirements of the Crown and/or proponents “to meet their statutory and legal obligations to [consult with] First Nations,” as well as notification to local governments. Respondents also suggested that other “potentially impacted communities [and groups]” should be notified of potential impacts. One respondent commented that “the proponent should be required to consult with, rather than merely notify, local governments.”

Discussion Issue 3: Required information

The proposed code specifies **desired performance outcomes** for the protection of human health and the environment. The responsible person submitting registration information to the director would be required to identify in the Design, Operations and Closure Plan how all relevant activities achieve these performance outcomes.

Question 3.1: In your view, are the role and activities requiring a qualified professional specified in the proposed code, appropriate and effective? Do you have any comments or suggestions for the ministry regarding the proposed involvement of a qualified professional in addressing elements specified in the code?

Several respondents commented that the “desired performance outcomes” indicated in the intentions paper do not “provide sufficient detail for firms to understand their practical implications” and that the ministry should “engage in additional consultation with the affected industry prior to developing legislation.”

Question 3.2: Do you have any comments or suggestions concerning site investigation and waste characterization provisions in the proposed code?

Several respondents commented on the waste characterization provisions in the proposed code. Those that commented suggested that “wood waste landfills are low risk industrial landfills...the Code should facilitate simple, low cost management of these landfills consistent with their low risk...[and] requirement for analysis [of wood waste be] limited to wastes that are outside a pre-determined list of common waste types.”

One respondent commented that “it seems prudent to identify a minimum set-back with site specific deviations assess on site specific conditions.”

Question 3.3: Do you have any comments or suggestions concerning community engagement provisions in the proposed code?

Several respondents expressed concern that intentions paper did not outline “community consultation processes” with sufficient detail to enable substantive comment. Comments included: “clarification is needed on how the comments/concerns of the community would be responded to by the ministry”; “community consultation processes are not clear and should be better defined” and “[we are] concerned that [‘community engagement’] does not equal public review.” One respondent suggested that any requirements in the code of practice “be modelled after the public consultation process stipulated in the ministry’s Guide to the Preparation of Regional Solid Waste Management Plans by Regional Districts.”

Another respondent recommended that the code “ensure[s] the opportunity for public review and commentary and include[s] a mechanism whereby the Regional Manager can refuse a registration where it is apparent that to do so would not be in the public interest, regardless of the technical virtues of the proposal.”

Question 3.4: Do you have any comments or suggestions for the ministry concerning surface and ground water quality and water quality monitoring provisions in the proposed code?

The one respondent who commented specifically on this question felt that “the requirements for monitoring and reporting are not clear [however,] the groundwater and surface water quality monitoring program design should be included as mandatory requirement of the registration.”

Question 3.5: Do you have any comments or suggestions concerning landfill gas management provisions in the proposed code?

The one respondent who commented specifically on this question felt that “the requirements for monitoring and reporting are not clear... details [concerning landfill gas management should be] provided as part of the registration requirements.”

Question 3.6: Do you have any comments or suggestions concerning the operating requirements for industrial non-hazardous waste landfills set out in the proposed code?

Specific comments from respondents included:

- “[With respect to] Design and Construction Requirements – We would like to see an explicit risk-based, performance approach... the IP does not demonstrate clearly that this approach will be used in the Code, therefore more information would be required to understand if the approach is appropriate”;
- “There should be a section in the code of practice on training requirements for landfill operators, similar to requirements presently in the Municipal Sewage Regulation”; and
- “Nuisance controls...should be defined in greater detail, ...a plan for monitoring and management of groundwater and surface water quality including a remediation plan to be implemented if groundwater or surface water quality performance objectives are not met [should be required] – not just a remediation program if objectives are not met...the operating requirements should, where appropriate, require site buffer strips and/or visual and acoustic barriers.”

Question 3.7: Do you have any comments or suggestions concerning the closure requirements for industrial non-hazardous waste landfills set out in the proposed code?

Respondents commented that closure requirements should be “risk based” on the basis of siting criteria and waste characteristics of the landfill and that “the closure plan should be prepared and approved by a qualified professional.”

Discussion Issue 4: Financial security and post-closure monitoring

The ministry is intending to require **financial security** (e.g., a performance bond) as part of a registration to ensure appropriate operation, closure and post-closure monitoring of industrial landfills.

Question 4.1: Do you believe that it is appropriate to require financial security as part of the registration for an industrial landfill? Why or why not? Do you have any comments or suggestions for the ministry to ensure that financial security requirements for industrial landfills are adequate to address human health and environmental protection concerns, appropriate to the degree of risk (potential magnitude of impacts and likelihood of occurrence), feasible to implement and administer, and fair?

Respondents commonly noted that “this is an issue of great importance and [with] implications for the financial viability of the industry.” Several of the responses from industry associations indicated an interest and desire to “engage [with] the ministry in further discussions as it develops financial security policy in this area.”

Specific comments in response to this set of questions included:

- “As noted by the Competition Council, in its recent report to the Premier, the industry is under significant competitive pressure and any requirement for financial security must take into account the implications for firms, as well as government”;
- “It is reasonable that sufficient funding is available to ensure safe and proper closure and post-closure monitoring of the site – it is therefore believed that owners of such facilities be required to provide funding, in the form dedicated and separate fund, perhaps held in trust, that is not accessible to the owner, its successor(s) or creditors in the event of the dissolution or insolvency of the company owning the landfill – the financial security provides added incentive to ensure that closure obligations are met and if not reduces burden on taxpayers to assume that responsibility”;
- “Parental Guarantees should be an acceptable level of financial security for large public companies that prepare annual financial reports and routinely disclose landfill liabilities as part of Canadian or US financial reporting requirements – we suggest that many corporations typically have an internal program to ensure closure funding is in place for closure activities – this accounting procedure should be used rather than posting financial security, or at least should be an option”;
- and
- “Financial security requirements should be assessed on the basis of size of the facility, type and quantity of wastes disposed, operational history and site specific conditions to evaluate the potential closure and post-closure risks and costs.”

Question 4.2: Do you have any comments or suggestions with respect to issues that should be of particular concern to the ministry following closure of an industrial landfill, appropriate means for addressing the issues, and/or the length of time that a registrant should be responsible for post-closure monitoring and activities?

Respondents commonly commented that while there “should be requirement for post-closure monitoring” the “monitoring requirements should reflect the risk assessment of the risks associated with a particular landfill.” One respondent commented that “the Code must provide for a liability-ending protocol for closed landfills and provide clarity about when a landfill on Crown land can be returned to the Crown and when the responsibility of the landfill owner legally ends.” Another respondent recommended that “the length of time that a registrant should be responsible for post-closure monitoring should be assessed and approved by a qualified professional based on site specific conditions (Geology and Hydrogeology), waste disposal history and waste characteristics – this is a critical component of responsible management and needs to be included in the best management practices with authority under the *Environmental Management Act*.”

Discussion Issue 5: Record keeping and reporting

The proposed code of practice would require establishment and maintenance of **records** for a landfill, available to the director following written request. The responsible person would also be required to prepare an **annual report** for the landfill that includes information on the types and volumes of wastes disposed of at the landfill and environmental monitoring. The annual report would be placed in the landfill operating record and made available to the director following written request.

Question 5.1: What comments or suggestions do you have for the ministry regarding the nature of required records and the manner in which they are to be kept?

Respondents noted that record keeping requirements should reflect risk, that groundwater and surface water monitoring program design and monitoring results be completed by a qualified professional, and that these records also be available to local government on request.

Discussion Issue 6: Preventing and reporting emergency events – powers of the director

The proposed code of practice would contain requirements for preventing and reporting emergency events in order to protect human health and the environment. The director would have the power to reduce or suspend the operation of the landfill until approved methods of pollution control have been restored.

Question 6.1: Do you have any comments or suggestions for the ministry regarding provisions for emergency events associated with an industrial landfill?

No responses were received to this question.

Discussion Issue 7: Best Management Practices

The ministry intends to support development of best management practices (BMPs) that would provide assistance to persons governed by the proposed code of practice in meeting their legal requirements under the proposed code.

Question 7.1: What comments or suggestions do you have for the ministry regarding the development of BMPs (e.g., existing information sources, organizations and/or agencies that could or should be involved)?

Some respondents expressed “concern that [best management practices] will become prescriptive requirements that will not reflect the latest information due to the significant resource requirement to develop and maintain such materials.”

Specific suggestions or comments included:

- “The Code [should] have provisions that allow smaller firms to fulfill their responsibilities without unreasonable cost implications”;
- “We prefer the use of the term Guidelines to Best Management Practices – any such document must be predicated on practical, cost-effective strategies based on the degree of environmental and health risk present”; and
- “For any Code, we believe that up to date guidelines developed with input from industry can be helpful to business operators.”

Discussion Issue 8: Assuring compliance and consistent administration of the regulation

The ministry sought comments and suggestions regarding implementation of the code of practice – with the aim of supporting cost-effective information dissemination that is appropriate to key interests involved in the design, operation and use of wood waste landfills, and government staff at provincial, federal and local levels.

Question 8.1: What comments or suggestions do you have for the ministry regarding appropriate and effective means for assuring compliance?

Respondents expressed support for a compliance and enforcement strategy that: “promotes voluntary compliance with the code”; “fits with the low risk nature of wood waste landfills”; “provide incentives for good performers”; and “[is developed] working cooperatively with industry.” Several respondents suggested that more detail about the ministry’s approach would be helpful (e.g., “what is meant by ‘compliance verification data’”) but that a “clear enforcement protocol...including penalties for non-compliance” is appropriate. One respondent referred to a proposal by the B.C. Environmental Industry Association “to establish a third-party auditing system, to be undertaken by qualified professionals, for the purpose of executing waste facility compliance audits and with results submitted to MOE...[and that] the concept is an excellent fit for the requirements under this COP” – commenting that “compliance verification is an essential tool for ensuring the long term environmental health of British Columbia and we welcome the opportunity to continue to assist the MOE in that goal.”

Question 8.2: What advice or suggestions do you have for the ministry that might support effective implementation of the code?

Targeted workshops in different regions of the province were suggested, with advance written notification for interested and affected stakeholders.

Discussion Issue 9: Protection of human health and the environment

Question 9.1: Are there any aspects of the design operations or closure of industrial non-hazardous waste landfills that could significantly affect human health or the environment that are not, in your view, sufficiently addressed in the proposed code of practice? If Yes, what are they? What suggestions do you have for the ministry to improve the manner in which these concerns are addressed?

Specific comments and recommendations in response to this question included:

- “Mandatory assessment of proximity of drinking water wells or surface water used as a source of drinking water should be included in the site investigation phase and addressed in the monitoring program as appropriate”; and
- “Depending on the location of the proposed landfill, and the wastes intended for deposition, design to ‘minimize’ potential impacts, as defined (meaning ‘reduce to the extent practical’) may not be sufficient to meet the necessary requirements to safeguard human health and the environment...the section should be amended to say ‘ensure that the landfill is designed to minimize or mitigate potential impacts’...[we have] the same concern regarding a similar requirement to “minimize” the impact from landfill gas – minimization may not be sufficient depending upon the potential size of the release and distance to the potentially impacted environment.”

Question 9.2: Do you have any other comments or suggestions for the ministry?

Additional comments in response to this question or as part of separate submissions in response to the intentions paper included:

- “We encourage MOE to recognize the need for the Code to have provisions that allow firms to fulfill their responsibilities without bearing unreasonable or unnecessary costs – in some cases guideline can be valuable in providing a simplified approach that can be adopted by firms in appropriate circumstances; however some of these might be more appropriately placed in a Schedule that applies to a specific industry”;
- “Mandatory assessment of proximity to drinking water wells or surface water used as a source of drinking water should be included in the site investigation phase and addressed in the monitoring program as appropriate”;
- “Overall, [we are] satisfied with the approach in developing the code of practice – we encourage the government to develop and implement the code as quickly as possible;”
- “The intended content of the proposed code of practice is far too general and does not provide sufficient detail to allow specific feedback from an operational perspective... the intentions paper does not reflect the acknowledged low risk nature of wood waste landfills”;
- “First Nations consultation – need to ensure there is consistent approach across ministries and that consultation is at a strategic level, not on a site by site basis – also there should be every effort made to avoid duplication of consultation requirements from one ministry to another with industry caught in the middle”;
- “[We are] supportive of a results based model that can deliver on managing environmental risk in a cost effective manner – does not increase delivered log costs. We commit to work with the ministry to identify key characteristics for the proposed code of practice and to ensure the product that is developed provides an overall structure and delivery model that works efficiently at both the administrative and operational levels”;
- “[We] recommend the consultation and drafting phase of the code of practice be formulated around the general approach taken by the Ministry of Forests, the Ministry of Environment and industry during the development of the Forest and Range Practices Act (FRPA) and the Forest and Range Planning and Practices Regulation. In the development of FRPA the industry was engaged and provided input during the setting of overall objectives and drafting of the regulations. The principle of forest industry engagement in this MOE process at all phases of drafting is paramount as we are the only stakeholder to be impacted by the initial scope of the code”;
- “It is essential for the ministry to engage in extensive and meaningful consultations with industry in the course of developing new Codes of Practice. Given the complexity of Codes and the fact that operating under Codes will be a new experience for industry, this requirement cannot be met by holding a handful of meetings with industry representatives at the front end of the process, and then proceeding to the drafting stage. Instead, industry needs to be significantly engaged with ministry staff throughout the process. Moreover, we believe it is a mistake to treat the industries that will be covered by and have to live with Codes as simply another “stakeholder”. Rather, the ministry should view these industries both as clients and as partners in the Code development process. Failure to do so increases the risk that the resulting Codes will be unworkable and lead to higher costs for industry”;
- “For the industries affected, the transition from permits to Codes of Practice should be either “cost neutral” or, preferably, result in lower overall costs. [Our] support for the Ministry of Environment’s policy of reducing the number industries and activities subject to permits by

establishing Codes has always been premised on the principle that this shift will improve – or at a minimum not harm – the competitive position of B.C. businesses. In the end, our judgment concerning the Codes that emerge from the ministry’s current process will depend in large part on whether this test has been met”;

- “[Our] association welcomed the MOE’s announcement of its intention to simplify environmental management through the replacement of individual site Permits with generic Operating Plans and for homogeneous operations to be controlled using Minister’s Codes of Practice”; and
- “[Our] association supports the Ministry of Environment’s move to the issuance of performance-based standards and, in particular supports the draft Industrial Non-Hazardous Waste Landfills Code of Practice Policy Intentions Paper... [We are] currently offering a comprehensive landfill training course to landfill operators in British Columbia and we would like to work with the Ministry of Environment to expand on the training requirements for both industrial and municipal landfill operations in British Columbia.”