



# **SOLID WASTE MANAGEMENT PLANNING GUIDELINE**

## **INTENTIONS PAPER**

### **SUMMARY OF PUBLIC COMMENTS**

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## **Solid Waste Management Planning Guideline – Intentions Paper**

### **Summary of Public Comments**

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## **A. INTRODUCTION AND BACKGROUND**

The Ministry of Environment (the ministry) is updating the Guide to Solid Waste Management Planning (Guide). The Guide outlines the process for regional districts to develop and coordinate a solid waste management plan. A solid waste management plan also acts as a blueprint for reducing disposal of municipal solid waste.

This report provides a summary of stakeholder comments received through the consultation on the intentions paper.

### **Background to the consultation process**

A policy intentions paper was posted for public review and comment on the ministry's website September 16<sup>th</sup> through November 15<sup>th</sup>, 2015. The intentions paper outlined the ministry's objectives for the updated guideline, background information and details regarding the ministry's proposed updates to the guideline. A separate response form for providing comments or suggestions to the ministry was also posted on the website.

The ministry hosted information webinars through the consultation period on October 8<sup>th</sup> and November 5<sup>th</sup>, 2015). Close to two hundred registrants participated in these webinars. The ministry also presented information on the intentions by invitation to: Southern Interior Waste Managers Association (SIWMA), Cranbrook (September 17); Waste Management Association of B.C. (WMABC), Coquitlam (October 15); and Coast Waste Management Association (CWMA), Langford (October 21). Notes from these sessions have been prepared for consideration in the ministry's review.

The complete set of responses received through the consultation process has been compiled and passed to the ministry for detailed review and consideration. All comments and references submitted through independent submissions and through direct consultations with stakeholders will be reviewed and carefully considered by the ministry in updating the guideline.

### **Purpose and format of the *Intentions Paper Summary of Public Comments* document**

This document has been prepared for the Ministry of Environment by C. Rankin & Associates, contracted by the ministry to independently receive, compile and summarize comment on the ministry's intentions for updating the guideline.

This summary includes an overview section describing the extent of respondent support for ministry intentions by topic and a description of common themes raised by respondents. This is followed by a synopsis of comments by topic as presented in the intentions paper. Where possible, the synopsis for each topic includes an indication of the extent of support expressed by respondents for ministry intentions (all, most, many, some, little or none) with associated comments, caveats or suggestions. Characterization of support was based on explicit statements made by respondents (e.g., "our organization agrees with...") and nature of recommendations or comments within a response (e.g., "this does not take into account..."). A representative sample of comments from individual respondents is also provided for each topic in accompanying text boxes (with respondent comments in quotes and without attribution). Notes for context or to clarify respondent comments are identified by square brackets – e.g., "[Comment from a respondent representing a regional district]".

## B. OVERVIEW OF CONSULTATION COMMENTS AND RESPONSES

Close to two hundred registrants participated in two information webinars hosted by the ministry over the consultation period. About half of participants identified as working for local government (from regions across the province) and half with private sector or other levels of government. Ministry staff also presented information on intentions at consultation meetings to industry and local government associations totalling more than 75 participants in Cranbrook, Coquitlam and Langford.

Detailed responses to the intentions paper received from twenty-seven respondents:

- Regional districts (9)
- Waste and recycling sector stakeholders (10)
- Community interest groups (6)
- Out of province (Alberta) regulatory agency (1)
- First Nation (1)

Many of the responses included substantive supplementary comment and covering information. All materials submitted, as well as notes from all webinars and consultation sessions, have been compiled and conveyed to the ministry for review.

### B.1. Extent of respondent support for ministry intentions by topic

“All”, “most” or “many” of the respondents indicated support for ministry intentions all but three of topic areas in the intentions paper (see table on following page). There was mixed feedback (the “some support” category) for three of the topic areas:

- *3.2 Desire for ministry involvement:* While many respondents expressed support for streamlining the planning review process, many also commended on the importance and value of ministry involvement and oversight. Respondents frequently pointed to shared interests between the ministry and regional districts in meeting zero waste and related goals. Several respondents pointed to the limited expertise and resources available to smaller regional districts relative to those with the organizational capacity to “influence the process”.
- *5.2 Environmental guiding principles:* Many respondents expressed general support for one or more of the principles, most commonly “promote the 3 R’s (reduce, reuse and recycle)” and “promote zero waste approaches” while also noting how these principles be interpreted or applied. Many respondents commented on the “manage tipping fees” principle suggesting clarification or additional guidance in how the principle should be applied by regional districts. The final principle addressing a “level playing field within regions for both private and public solid waste management facilities” also generated many comments and suggestions from respondents. A number of respondents suggested distinguishing between “environmental” and “economic” principles.
- *7. Plan content elements:* Several respondents expressed a concern that including closure and monitoring information requirements in a plan could entail significant cost and involve significant detail that would distract from the purpose of a plan. Other respondents provided specific suggestions regarding plan contents including, for example, “far more detail and strategies for the first four steps of the zero waste hierarchy”.

TOPIC AREA	EXTENT OF RESPONDENT SUPPORT			
	ALL	MOST	MANY	SOME
<b>Ministry intention to update the guideline</b>				
<b>1. Scope of the proposed updates</b>				
<b>2. Regional district planning and updating process</b>				
2.1 The three-stage planning process				
2.2 - Ten-year timeframe for plans				
- Five-year implementation & effectiveness review				
- Ten year renewal				
2.3 Plan updates – use of schedules				
<b>3. Ministry of Environment role</b>				
3.1 Plan development – interactions with the ministry				
3.2 Plan implementation				
<b>4. Targets</b>				
<b>5. Principles</b>				
5.1 Consultation principles				
5.2 Environmental guiding principles				
<b>6. Public accountability mechanisms</b>				
6.1 Advisory committees				
6.2 Public consultation				
- Community aware with opportunity to participate				
- Regional district flexibility in process and methods				
6.3 Reporting				
- Annual or bi-annual to regional district board				
- Five year implementation & effectiveness for public				
- Additional public accountability methods				
<b>7. Plan content</b>				
- List of elements to be included in a plan				
- Consistency with neighbouring jurisdictions				
- Interactions with stewardship programs				

## **B.2. Overview of common themes**

Common themes and indicative comments provided by respondents are provided below. This overview is not intended to be definitive. See the following sections of this document (responses to general questions and responses to proposed updates) for more a detailed summary of responses to each of the questions posed by the ministry in relation to the ministry's intentions.

### ***Support for updating the guideline***

Almost universally, respondents supported an update of the guideline. Respondents commented, for example, that “the current guideline has been useful in providing direction” and “many of its principles have stood the test of time” however, “the document is obviously dated”. One respondent noted that “updates that improve the efficiency of plan creation and implementation while reducing costs would be welcome”.

### ***Changes in the solid waste management “landscape” over the past twenty years***

Many respondents pointed to the many changes since introduction of the guideline twenty years ago, including: increased experience of regional districts with solid waste management planning; changes in roles of public and private sectors in waste reduction and recycling, including extended producer responsibility and involvement of producer stewardship groups; advances in technologies, including organics diversion, materials and packaging practices and innovations, and recycling technologies; and awareness and involvement of individual citizens and public interest groups in environmental and waste management issues.

### ***Continued role for the Ministry of Environment in support and oversight of solid waste planning***

Many respondents commented that the ministry has important roles to play in terms of supporting solid waste management planning. Among respondents from regional districts, many expressed concern that less support is and/or will be available from ministry staff. This was a concern in particular for regional districts outside of urban areas. Respondents also commonly commented that the ministry's oversight role in reviewing and approving solid waste management plans continues to be important.

### ***Setting and reporting progress on waste reduction and related targets***

Many respondents commented on the importance of targets in the guideline and to the need to update the figures in the guideline document. Expressions of support for linking the guideline document to current targets and associated provincial direction also included additional comments or requests from respondents, such as additional information on how provincial targets are established and the need to distinguish between rural and urban regional districts when establishing appropriate targets.

### ***Importance of public involvement, advisory committees and regulatory oversight***

Almost all respondents supported inclusion of guidance on public consultation and welcomed increased flexibility in establishing advisory committees. Many respondents commented on the challenges involved with public consultation, as well as its importance. A number of respondents from industry and community organizations highlighted the important role that the ministry plays as a regulator and overseer in reviewing and approving solid waste management plans, including public involvement provisions.

### ***Clarification and application of principles set out in the guideline***

Many respondents provided suggestions to clarify the set of ten environmental principles, and list of consultation principles, described in the intentions paper. Most respondents pointed to the principle of promoting zero waste approaches as overarching or primary principle and further suggested that the ministry emphasize zero waste and the 5 R hierarchy noted in the intentions paper. Respondents also commonly suggested distinguishing between “environmental” and “economic” principles. Commonly, respondents noted



that economic principles (such as managing tipping fees) should not subvert primary principles and the 5 R hierarchy.

***Relationship with the Recycling Regulation and product stewardship groups***

Many respondents pointed out that extended producer responsibility (EPR) and the role of provincial product stewardship groups established under the Recycling Regulation of the *Environmental Management Act* (EMA) is much more prominent than when the existing guideline was written. Respondents commonly suggested that the roles and interactions between product stewardship groups, regional districts and the ministry should be more explicitly addressed in the updated guideline.

## C. RESPONSES TO GENERAL QUESTIONS

### How useful have you found the current guideline in supporting your work?

Some respondents noted that they found the current guideline “quite” or “very useful” while an equal number found the document “not useful at all”. About a quarter of respondents commenting on this question found the guideline to be “adequate”.

*Sample of respondent comments:*

“In re-reading the 1994 Guide, I was surprised by how much of it is still relevant today”

“[Our First Nation] is not engaged with the regional district in determining waste targets. The Nation does not currently have waste targets, nor does it measure waste volume”

“The current guideline has been useful in providing direction to regional districts; however, some of the existing regulations and processes are onerous”

“The provisions for public consultation are overly prescriptive”

“I have seen consultation and other areas of the plan ignored”

“Guideline needs to be updated to be more reflective of the current solid waste management environment”

“While the document is obviously dated, many of its principles have stood the test of time”

### Do you have any general comments about the ministry’s proposed updates to the guideline?

**Support for ministry intentions:**

ALL

**MOST**

MANY

SOME

LITTLE OR NONE

Almost all respondents from regional districts expressed support for updating the guideline, seeking updates that would provide flexibility, as well as improve efficiency and clarity for the planning process.

While most other respondents expressed general support for the ministry’s intentions, several concerns or cautions were raised in comments. These included: the need to recognize the role of the private sector and product stewardship groups in solid waste management and recycling; maintaining or strengthening ministry oversight in the preparation and approval of plans; and the need for additional details on ministry intentions before being able to comment.

*Sample of respondent comments:*

“Generally quite positive”

“Appreciate the flexibility being afforded and the intent of streamlining and clarifying the process”

“More could be done to support [First] Nations involvement in these discussions” [comment from a First Nation respondent]

“Goals would be more meaningful if they... translated into new targets for every [regional district]”

“Private sector importance needs to be incorporated” [comment from a private sector respondent]

“Some things have changed tremendously [since the guideline was developed] such as the advancement in organics diversions, improvements in technologies and the innovation the private sector has provided”

## D. RESPONSES TO PROPOSED UPDATES

### 1. Scope of the proposed updates

The proposed updates focus on changes that can be addressed within the *Environmental Management Act* legislative framework (see intentions paper pages 2-3).

Do you have any comments regarding the scope of the proposed updates?

Support for ministry intentions:

ALL

**MOST**

MANY

SOME

LITTLE OR NONE

While almost all respondents from regional districts noted support with respect to the scope of the proposed updates, some other respondents provided suggestions for expanding the scope or strengthening the legal import of the guideline. Suggestions included addressing cross-boundary transport of waste materials (e.g., between regional districts, inter-jurisdictional) and addressing recyclables and organics, as well as residual materials.

*Sample of respondent comments:*

“Alberta, for instance, currently receives non-hazardous material for landfilling from British Columbia because of existing regional disposal bans”

“The guideline should be mandatory... it is important to preserve the ‘what’ is needed in a plan in the effort to relax requirements of the ‘how’ ”

“The guideline should ensure that waste is considered by all regional districts as a resource and that tools and incentives are included to extract the greatest potential from solid waste”

“[Our local government] supports that the review process will not result in legislative changes”

“[Our organization has] encouraged the creation of an independent governing agency such as a Recycling Management Board to ensure all stakeholders interests have been taken into consideration in any new policies or regulatory changes”

“The intentions paper fails to address how very small regional districts, with limited resources, will be able to better tackle the overwhelming task of undertaking a SWMP update”

Do you have any comments for consideration by the ministry on future consultations related to municipal solid waste policy and/or legislative changes?

Many respondents expressed a desire for continued participation in consultations related to updating municipal solid waste policy and any legislative changes. Respondents encouraged the ministry to continue to engage with local governments (e.g., through the UBCM and the Association of Vancouver Island and Coastal Communities), private companies (such as recycling companies) and product stewardship organizations. Specific recommendations for the ministry included providing support for First Nations involvement in consultations and addressing particular topics, such as target setting, integrated waste and resource management, zero waste and GHG emission reductions.

## 2. Regional district planning and updating process

### 2.1 Planning process

Do you have any comment regarding the three-stage planning process?

Support for ministry intentions:

ALL

**MOST**

MANY

SOME

LITTLE OR NONE

Respondents who commented on this topic recognized that plans now exist for reference when renewing plans and that ministry involvement may not need to be delineated as explicitly as in the current guideline. It was commonly noted that the planning process should have clear stages with explicit guidance and common understanding of the requirements and approval process at each stage.

*Sample of respondent comments:*

“[Our regional district] agrees that ministry reviews could be reduced from 22 potential points of involvement; however, we strongly believe that some ministry review is still required to ensure successful adoption of the plan”

“A three-stage planning process is extremely valuable as revisiting and updating the fundamental approaches to the 3R's and better understanding waste stream composition, emerging technologies and the impact of Zero Waste policies is important”

“The three stage planning process, with the requirement to obtain ministry approval at each step can be time consuming – this may be improved based on the intended changes”

“Stage 1 can remain useful as a description of the current plan, and an evaluation... and gap identification – stage 2 could be strengthened to include targets for management of each stream according to the hierarchy and rationale for management at any particular level of the hierarchy”

### 2.2 Plan timeframe

Do you have any comments regarding the timeframe of ten years for the plans and the setting out of a time horizon for commitments?

Support for ministry intentions:

**ALL**

MOST

MANY

SOME

LITTLE OR NONE

Respondents commented that a clear timeframe for plans is important and that a ten year plan allows a long term vision to be set while balancing implementation challenges and preparation costs. Several respondents highlighted the need to also include clear revision and update provisions (as described in ministry intentions). Additional suggestions for the ministry included more frequent reviews (e.g., at three and six years in the life of a plan) and “only allowing a ten-year plan if the initial plan is strong enough”.

Do you have any comments regarding the five-year implementation and effectiveness review?

Support for ministry intentions:

ALL

**MOST**

MANY

SOME

LITTLE OR NONE

While almost all respondents who commented on this question supported the intention, several requested clarification from the ministry regarding extent of required actions and the role of a third party in the review.

*Sample of respondent comments:*

“Will a third party consultant be optional or required to provide the effectiveness review?”

“Involving a third-party to conduct the review is an excellent idea providing that the ministry or Province is involved with the selection so as to avoid conflicts of interest”

“Is the five-year review mandatory or recommended... will the ministry have any involvement... what parameters will need to be considered... do regional districts have to submit the review to the ministry?”

“It is unclear if the five-year implementation review replaces the Biennial Progress Report – if so, five years is too long a period of time between reviews in order to be fully accountable”

**Do you have any comments regarding the ministry’s intention to add a provision that a plan should be renewed every ten years?**

**Support for ministry intentions:**

ALL

**MOST**

MANY

SOME

LITTLE OR NONE

Almost all respondents commenting on this topic echoed their support for a ten year renewal of plans. A few respondents raised concerns, particularly about the potential costs for small rural regional districts with limited financial resources.

*Sample of respondent comments:*

“It’s a good idea – Zero Waste policy objectives and advancements in recycling and processing technologies have an impact on the waste stream and therefore on how it should be managed – broader thinking on the circular economy and cradle-to-cradle is required to progress”

“Regional districts would need some guidance for longer term goals for long-term infrastructure investments”

“The provision... should acknowledge the possibility of events that may delay the updating of a SWMP after ten years”

“Will the ten year renewal require the original three stage approach?”

### 2.3 Plan updates

**Do you have any comments regarding the ministry’s intention to provide guidance for plans to be living documents – by enabling use of schedules to the plan with specified information and a process for updating the schedules over the life of the plan without resorting to updating the full plan?**

**Support for ministry intentions:**

ALL

MOST

**MANY**

SOME

LITTLE OR NONE

Many respondents expressed support for the concept of using schedules to allow updating of specific elements of a plan while also noting the potential for misinterpretation of the term “living document”. Several respondents asked for ministry clarification of the specific provisions to be included in schedules and the triggers that would be used to gauge public consultation or notification processes.

*Sample of respondent comments:*

“One of the key stakeholders who must be made to clearly understand commitments will be Regional District Boards of Directors... schedules will allow the Boards to understand what happens next, how much it will cost and what the relevant performance metrics are”

“Minor ‘living document’ provisions would not generally be made by our organization as it doesn’t matter for minor issues if the plan is out of date”

“Regional districts with a waste stream management licensing bylaw will have more information about facilities than those who [don’t] – will the ministry require all regional districts to have a licensing bylaw?”

“The guideline should limit what is allowed to be updated through schedules... plan changes should be transparent and the public should be consulted on topics [such as capital and operating costs for plan implementation or plan programs and strategies where] the implications for... taxpayers could be significant”

### 3. Ministry of Environment role in plan development and implementation

#### 3.1 Plan development – interactions with the ministry

Do you have any comments regarding the ministry providing a plan checklist/summary template for a regional district corporate officer to certify–documenting how the plan and planning process meet the ministry’s desired results and requirements?

Support for ministry intentions:

ALL

MOST

**MANY**

SOME

LITTLE OR NONE

This topic generated substantive comment from respondents. Several respondents commented that ministry guidance in the form a plan checklist or template to support consistency is welcome. However, several noted also that a checklist cannot replace dialogue with ministry staff as a plan is developed. The importance of consistent ministry guidance and oversight was a common theme among respondent comments.

*Sample of respondent comments:*

“Certification [of the plan checklist] would need to come from the Chair of the Board [not the corporate officer]”

“If the ministry wishes to be less involved in the planning process then a SWMP that meets the checklist requirements should always be approved”

“Involvement by MOE during the planning process would allow for a better understanding [of] the challenges and barriers to meeting provincial targets”

[One respondent provided detailed recommendations on development of a “provincial zero waste plan” as an alternative to the plan development process set out in the guideline] “This could be based on the work already done to develop the Zero Waste Business case as well as the waste projections for the future – to achieve zero waste, there needs to be actions at multiple levels – from individuals and businesses to local government and regional districts, and to the province and the federal government... the province should ensure that regional districts have plans based on the zero waste philosophy, that they enact these plans and that they encourage their municipal partners to do their fair share or enact their own plans... there are several areas where the province should be the leader using tools that only the province has available... a) looking more broadly to how materials flow similar to how Oregon has approached its planning... b) developing a provincial zero waste plan with interim targets and annual reporting... c) convening planning sessions with local government... d) expanding the products covered under EPR regulation; enforcing the regulation; greatly increased focus on reduction and

reuse in plans... e) public education and behaviour change systems... f) planning for disposal in a comprehensive way... [and] g) have a clear statement stating that no new waste incineration... this allows all levels of government to focus upstream on solutions while also signaling the end of enabling continued rampant wasting of materials”

Can you suggest other alternatives or positions within a regional district that would be appropriate for certifying how the plan and planning process meet the ministry’s desired results and requirements?

Limited comments were received on this question. Respondents commented that “the ministry needs to retain responsibility... [and should] work with regional districts as required to ensure that desired results are met”. “The Board Chair” was suggested as an alternative avenue for certifying a plan document.

### 3.2 Plan implementation – interactions with the ministry

Do you have any general comments regarding this topic?

Support for ministry intentions: ALL MOST MANY **SOME** LITTLE OR NONE

While many respondents expressed support for streamlining the planning review process, many also commented on the importance and value of ministry involvement and oversight. Respondents frequently pointed to shared interests between the ministry and regional districts in meeting zero waste and related goals. Several respondents pointed to the limited expertise and resources available to smaller regional districts relative to those with the organizational capacity to “influence the process”.

Sample of respondent comments:

“[Our regional district’s] hope is that ministry resources will continue to be available to support solid waste management planning processes when required”

“Balance streamlining with ensuring the maintenance of effective, independent, regulatory oversight”

“Reinstate funding assistance for preparation of plans”

## 4. Targets

Do you have any comments or suggestions regarding targets that could or should be included in the guideline?

Support for ministry intentions: ALL MOST **MANY** SOME LITTLE OR NONE

Respondents commonly noted the importance of provincial, as well as regional district, targets and supported updating the outdated targets set out in the existing guideline. Several respondents commented that rural districts face distinct challenges relative to more urbanized regions. As well, respondents requested clarification on the choice of provincial targets, as well as the process for setting provincial targets.

*Sample of respondent comments:*

“Develop a provincial zero waste plan with interim targets and reporting”

“[While] provincial targets are useful in setting overall direction, a 350 kg/capita disposal rate for rural and northern Regional Districts is unrealistic given the barriers, including financial costs to waste reduction programs”

“The goals and target of any updated plan need to be reasonable and attainable – there is a cost as well as a shared responsibility for any goals and targets”

“Rural residents may not necessarily require mandated organics collection, transportation and composting”

## 5. Plan principles

### 5.1 Consultation principles

Do you have any comments or suggestions regarding the consultation principles listed or any additional principles to suggest?

Support for ministry intentions:

ALL

**MOST**

MANY

SOME

LITTLE OR NONE

Limited comments were received on this question. Respondents provided more substantive suggestions under section six of the intentions paper (public accountability mechanisms – advisory committees, public consultation and reporting).

*Sample of respondent comments:*

“Provide clarity regarding the required effort for contacting unresponsive stakeholders”

“We agree in general with the principles listed [our regional district] also has a public participation framework”

“Minimum stakeholder participation should be defined”

Are there any other key stakeholder groups that should be included in the consultation process beyond those listed in the intentions paper (see second bullet on page 5)?

Limited comments were received on this question. Suggestions from respondents included: Zero Waste Canada, the general public, entrepreneurs, materials-based groups, waste management industry stakeholders, non-profit groups, large education institutions, provincial and federal ministries and adjacent regional districts. One respondent recommended that “identification of key stakeholders could in large part be left to the regional district given the wide variation in stakeholders... [in different regions of] the province”.



## 5.2 Environmental guiding principles

Do you have any comments regarding the environmental guiding principles listed or any additional principles to suggest?

Support for ministry intentions:

ALL

MOST

MANY

**SOME**

LITTLE OR NONE

Extensive and substantive comments were received in response to this question. Many respondents expressed general support for one or more of the principles, most commonly “promote the 3 R’s (reduce, reuse and recycle)” and “promote zero waste approaches” while also noting how these principles be interpreted or applied. Many respondents commented on the “manage tipping fees” principle suggesting clarification or additional guidance in how the principle should be applied by regional districts. The final principle addressing a “level playing field within regions for both private and public solid waste management facilities” also generated many comments and suggestions from respondents. A number of respondents suggested distinguishing between “environmental” and “economic” principles.

*Sample of respondent comments:*

“At this point, environmental guiding principles are almost a given – it would be acceptable for the province to establish guiding principles and require plans to work within that framework”

“[Our regional district recommends an] additional principle: establishment of a circular economy within the province”

“It would be better to base... the new Guideline, on the principle: ‘what can regional governments (or the Province) do to create a healthy market place that will complement stewardship programs and drive private sector innovation and investment toward the service plan targets at the least cost to taxpayers and businesses’ ”

“[Our recycling organization’s] current environmental guiding principles acknowledge the need for ‘full accounting of costs and benefits, both monetary and non-monetary’ ”

“Will regional districts be able to choose which guiding principles they want to adopt or do all have to be included in a SWMP? Is there room to adopt additional principles?”

A detailed summary of comments on specific principles is provided below.

***Principles 1-3: (1) promote zero waste approaches (2) promote the 3 R’s; and (3) maximize beneficial use of waste materials and manage residuals appropriately***

Many respondents commented on the linkages among these three principles. While almost all respondents expressed support for the adoption of a zero waste approach, several noted that the term “zero waste” can be interpreted differently with respect to the role of waste to energy recovery in a zero waste approach. Several respondents suggested a hierarchy of principles, with zero waste approach as the primary or guiding principle.

*Sample of respondent comments:*

“Elevating the importance of the first 3 R’s in the 5 R hierarchy is consistent with zero waste approaches – waste management strategies should be prioritized as [noted in the intentions paper]... reduction, then reuse and recycling, then material or energy recovery, and after all other options are exhausted, residual management”

“To date with the exemption of the recently formed Nation Zero Waste Council whose scope of authority is to encourage ‘waste reduction at its source’ programs little has been done within EPR programs or anywhere else to encourage reuse or to design materials and products for recycling”

“Please implement the international standard for Zero Waste including the Zero Waste Hierarchy to replace the... Pollution Prevention Hierarchy”

“ ‘Zero waste’ should be considered as an approach that impacts jobs and economic development; the approach does not necessarily generate jobs and stimulate economic development”

“Zero Waste is not a neutral term nor universally defined – our [regional district] has consciously chosen to not use this term”

“These principles would be stronger if they focused on zero waste in the context of material flows”

“No clear planning is or has been based on reducing or reuse”

“[Our organization] recommends that the Province clarify how the waste to energy guidelines are to interact with zero waste objectives or preferably rescind them altogether and make zero waste the sole objective of the Guideline”

***Principles 4 and 5: (4) support polluter and user-pay approaches; and (5) manage tipping fees***

Almost all respondents who commented on principle #4 expressed support. Several respondents also provided comments or suggestions on the challenges and/or benefits involved in applying the principle. The principle of “managing tipping fees” generated substantive comment. While respondents commonly acknowledged the ministry’s stated intent that “tipping fees should be structured to encourage diversion and recycling opportunities, while avoiding unintended consequences such as illegal dumping”, many provided additional comments on the topic.

*Sample of respondent comments:*

“Regional districts are keenly aware of managing tipping fees”

“The Guiding Principle of managing tipping fees to encourage diversion is challenging to achieve without waste flow control”

“The ‘outdated’ notion of high tipping fees to encourage recycling needs to be rethought and restructured given ... even low cost disposal comes at a higher cost than stewardship programs... it encourages regional districts to protect existing [or planned] assets that are not cost-effective or unnecessary... taxpayer gains made on EPR are off-set by inefficient or costly disposal; [and] the [associated costs] in large urban centers are borne largely by the ICI sector”

“Adding the ‘while avoiding unintended consequences of illegal dumping’ undermines the principle... the intent to manage tip fees to encourage recycling ... shouldn't be undermined by potential for illegal dumping”

“Higher tipping fees for disposal have been proven to provide a compelling economic incentive for greater diversion”

“There an inherent conflict [of interest in setting tipping fees] where regional districts are both an operator and a regulator”

“Municipalities and regional districts should be encourage to explore financial models other than tipping fees to fund its solid waste functions – under a Zero Waste policy framework, tipping fees are unsustainable”

***Principles 6 and 7: (6) separate organics and recyclables out of the garbage wherever practical; and (7) establish and enforce disposal bans***

Several respondents recommended strengthening principle #6 by, for example dropping the “wherever practical” caveat. While some respondents commented that source separation is a preferred method for

removing organics from the waste stream, others pointed to the “practical limitations” involved and recommended mixed waste processing. Several respondents who provided comments regarding principle #7 suggested that provincial scale bans can be more effective than those imposed by individual regional districts.

*Sample of respondent comments:*

“Organics composting should be considered with recycling”

“It is not separating anything ‘out of the garbage’ so much as preventing it from going into the garbage”

“[Members of our organization] agree that there are practical limitations to the separation of organics and recycling at source, especially when they are twist-tied in a garbage bag”

“Disposal bans and tipping fees are great tools, but the province could help by creating templates to harmonize them to the strictest ones so that there is less incentive for waste migration”

“We believe mixed waste processing is a good, if not the best, option – there is support for this option among certain municipalities and from the business sector”

***Principles 8 and 9: (8) collaborate with neighbouring regional districts wherever practical; and (9) develop collaborative partnerships with stakeholders to achieve regional targets set in plans***

Almost all respondents who commented supported the intent of the principles referring to “collaboration”. Several noted that the flow of waste between regional districts should be explicitly included in plans and reporting, and that any flow of waste between regional districts should be by mutual agreement between the districts. Some respondents cautioned that legal authority of regional districts is limited and that collaboration cannot be mandated, citing stewardship programs under the Recycling Regulation.

*Sample of respondent comments:*

“In practice it is city and municipal bylaws that are the prime mechanism for supporting stewardship programs in connection with controlling what gets picked up at the property level”

“[Our regional district] is pleased to see principle 8... included in the intentions paper”

“[Our product stewardship association] currently encourages [our] members to become involved with local and regional districts... [our association] would like to take a greater role in working with regional districts, municipalities and other stakeholders”

“The inclusion of industry product stewards as a collaborative stakeholder for RD's is a bit ambitious... the inclusion of waste generators and service providers [however] is good form”

“Collaboration should include partnerships beyond neighbouring regional districts as access to facilities and markets should not be limited by distance”

***Principle 10: level playing field within regions for both private and public solid waste management facilities***

Comments regarding this principle were divergent. On the one hand, several respondents commented that there is an inherent conflict of interest when a regional district is both an operator (i.e., of a solid waste management facility) and a regulator. In contrast, other respondents commented that this principle is of import only following clear application of other principles such as promoting zero waste approaches.

*Sample of respondent comments:*

“A true level playing field cannot be achieved between private and publicly funded facilities that compete for services as public facilities are subsidized”

“[It] would make a lot of sense to have a level playing field across the province so there’s less responsibility on local staff and directors to create this”

“The prevalence of private waste disposal facilities in the US has created a system of little incentive to reduce waste and a strong lobby for continued wasting and weakened recycling... private companies should be encouraged for the first levels of the zero waste hierarchy but extreme caution should be taken before encouraging any increase in private waste disposal”

“In addition to setting out goals and targets for improving our waste management strategies, the MOE must clarify that all updated guideline must address full impact on the private sector waste management industry”

## 6. Public accountability mechanisms

### 6.1 Advisory committees

Do you have any comments regarding this topic?

Support for ministry intentions:

ALL

MOST

**MANY**

SOME

LITTLE OR NONE

Respondents commented on both the value of and the challenges associated with advisory committees and their role in waste management planning. Many respondents expressed support for the ministry’s intentions to “emphasize efficient committee formation” and develop standardized template documents for use by regional districts.

*Sample of respondent comments:*

“Appreciate the consideration in the use of a single advisory committee for small Regional Districts with limited staff capacity”

“Advisory committees in waste management plans can be very frustrating for the participants (lack of real authority), consume resources (time, money) and ultimately lack utility”

“Advisory committees are important for accountability and transparency – they should not be internal regional district”

“ ‘Reasonable efforts’ needs to be clarified – [our stewardship organization] would like to see further clarification of interests of the proposed stakeholder groups – it is important that committees are balanced and that all industry partners can participate”

“There should be some way developed for committees to communicate with the ministry should they feel their input is not being heard”

## 6.2 Public consultation

Do you have any comments regarding the desired outcome of community members and all impacted stakeholders being aware of the planning process and of opportunities to participate and/or provide input?

Support for ministry intentions: ALL MOST **MANY** SOME LITTLE OR NONE

Many respondents noted their support or agreement with the intent to focus on outcomes rather than methods in an updated guideline.

*Sample of respondent comments:*

“The ministry should have to approve consultation plans... to ensure they meet the requirements under EMA”

“The outcomes for this need to be strengthened”

Do you have any comments regarding the proposed flexibility for regional districts to determine how best to engage their stakeholders?

Support for ministry intentions: ALL **MOST** MANY SOME LITTLE OR NONE

Almost all respondents who commented on this question noted the need for flexibility in determining the best means to engage stakeholders. Others cautioned, for example, that “too much flexibility is not a good thing”.

*Sample of respondent comments:*

“This section is gold and astutely recognizes the current realities”

“The flexibility should be extended to any and all committees involved... for example, if stakeholders identify the need for education in order to understand issues and recommend options, then the [regional district] may have to provide flexibility in approach, time frame, and staff support to meet this need”

“The consultation report template should include basic requirements not solely focused on the outcomes”

“The Environmental Assessment Office format for proponents to respond to feedback would be a good model”

“We recommend an appeal process that allows the Province to adjudicate special cases where the process and response is claimed to be in material violation of the consultation principles set out in the Guideline”

Do you have any comments or suggestions regarding the content of consultation reports?

A limited number of respondents commented on this question with suggestions or notes.

*Sample of respondent comments:*

“A template should be provided [for] content of the consultation report and simplicity should be considered”

“There should be some mechanism to reflect the amount of concern demonstrated for a particular issue – the consultation report can identify issues but decision makers may not be aware of the impact the concerns may have on factors such as the open marketplace”

**Do you have any comments regarding use of a plan checklist/summary document asking a corporate officer to demonstrate and certify that adequate consultation took place?**

The limited number of respondents commenting on this question generally supported the ministry’s intentions.

*Sample of respondent comments:*

“Adequate consultation needs to be demonstrated – it will be the ministry’s decision to certify that it meets their requirements”

“Corporate Officers, in my experience are professional and take their responsibilities very seriously”

“The ministry's involvement at the planning stage may avoid poor consultation practices and therefore inadequate outcomes”

“Summaries or checklists should be signed off by the Board Chair after receiving stakeholder and regional district reports”

### 6.3 Reporting

**Do you have any comments regarding the items suggested for annual or bi-annual reporting to the regional district board?**

**Support for ministry intentions:**

ALL

MOST

**MANY**

SOME

LITTLE OR NONE

Responses from regional districts varied in their support for annual or bi-annual reporting. Some were supportive (e.g., of the municipal solid waste calculator/ reporting tool) while others commented that this could involve a significant expenditure of resources for smaller regional districts. In contrast, almost all other respondents expressed support for annual or bi-annual public reporting of waste management information.

*Sample of respondent comments:*

“Should be left to particular regional district boards to decide – if board members are interested in hearing an annual or bi-annual report then this would be a good idea”

“Additional reporting is not required – the Annual Report that is currently required by the ministry provides a detailed assessment for the board, and is frequent enough to keep the board apprised of progress and issues”

“Reporting is essential but these reports should be made public and easily accessible... there should be a mandatory annual report both to the province as well as the local residents and businesses about the status, results of the past year’s efforts and the objectives for the next year’s efforts”

“For our regional district, solid waste management is a key service for which reporting to the Board already occurs on a regular basis and specifically during the budget process”

“We need more information about what reporting of monitoring data for closed sites and compliance activities would entail”

**Do you have any comments regarding preparation of the five-year implementation and effectiveness review report for the public?**

**Support for ministry intentions:**

ALL

**MOST**

MANY

SOME

LITTLE OR NONE

Most respondents commenting on this question noted that the five-year effectiveness review would be useful. A few respondents suggested a shorter time interval (e.g., at three and six years) for the review.

*Sample of respondent comments:*

“Use more locals in the review process”

“Templating and detailed ministry provided guideline that allow regional districts to prepare these reports in house may result in cost savings as opposed to needing a third party to write them”

“There should be a full review and update every five years to ensure continuous improvement and planning for the next actions”

**Do you have any comments or suggestions to support public access to reports?**

**Support for ministry intentions:**

ALL

**MOST**

MANY

SOME

LITTLE OR NONE

Almost all respondents who commented on this topic supported public access to reports and provided suggestions on existing or new avenues for posting or distributing reports. One respondent noted that some reports (e.g., EPR annual reports paid by stewards) are prepared for auditing purposes and are not available to the public while other documents (e.g., stewardship plans and stewardship agency annual reports) are public and should be more accessible.

*Sample of respondent comments:*

“All reports received at the public portion of regional district board meetings are publicly available as part of the meeting minutes”

“[Our stewardship organization] would like to see more work being done by regional districts and municipalities to ensure stewardship plans are accessible to all who residents of B.C.”

“Prior to making the report accessible to the public, the Ministry should provide any possible feedback to verify they are in agreement”

“They should all be posted on the regional districts’ website and available at the district office”

## 7. Plan content

Do you have any comments regarding the existing guideline’s list of elements to be included in a plan? (see intentions paper page 8 and section 29 of the guideline)

Support for ministry intentions:

ALL

MOST

MANY

**SOME**

LITTLE OR NONE

Several respondents expressed a concern that including closure and monitoring information requirements in a plan could entail significant cost and involve significant detail that would distract from the purpose of a plan. Other respondents provided specific suggestions regarding plan contents including, for example, “far more detail and strategies for the first four steps of the zero waste hierarchy”.

*Sample of respondent comments:*

“Closure and monitoring... reporting is [typically] required under Operational Certificates – does it need to be included in Solid Waste Management Plans?”

“In addition to listing EPR programs in area, EPR programs should be evaluated to show how the programs achieve or fail to achieve targets”

“Plans need to promote continuous improvement,... include achievable steps to goals,... be more results based,... be streamlined... so that monies go into action and program implementation, promote local solutions and local economic development,... be unique to community,... clearly define Zero Waste policies [and] look at community assets and opportunities instead of government controlled programs”

“Element (j) in current Section 29 should include schedules and processes for updating”

Do you have any comments regarding efficiency/consistency opportunities with neighbouring regions being an element of a plan?

Support for ministry intentions:

ALL

**MOST**

MANY

SOME

LITTLE OR NONE

Almost all respondents commenting on this question supported “the principle” of the ministry’s intentions. Several then noted the challenges in application of the intent. Other respondents supported collaboration and the need to encourage “diversity and innovation”.

*Sample of respondent comments:*

“The expansion of stewardship programs has reduced the need for inter-regional plans”

“For geographically large, rural Regional District, efficiency and consistency opportunities with adjacent regions are limited”

“A broader view of regional cooperation should be adopted that seeks efficiencies with neighbouring jurisdictions including those beyond our provincial and national borders”



Do you have any comments regarding strategies being defined in a plan for how regional districts interact with industry product stewardship programs?

Support for ministry intentions:

ALL

**MOST**

MANY

SOME

LITTLE OR NONE

Most respondents supported this intention and several provided specific suggestions for the ministry to consider in updating the guideline.

*Sample of respondent comments:*

“SWMPs should consider investigating new and emergent technologies that consider value added manufacturing, or re-manufacturing opportunities for the reuse of solid waste to aid economic diversification and job creation [and]... consider investigating the involvement of private sector partners relating to developing business case for collection, processing and marketing of organics”

“The Guideline should include specific mention of how local governments should support industry product stewardship programs including: supporting the Recycling Council of BC’s Recycling Hotline and Recyclopeda,... providing adequate zoning for public recycling facilities,... enforcing landfill bans and illegal dumping bylaws, [and] providing operational collection services only where a private sector option is not available”

“Documentation of and the development of effective interaction between industry product stewardship programs and regional districts could be considered essential in modern solid waste management planning in B.C., especially for rural and northern regional districts”

“Regional districts should not be required to spend much time or money analyzing the efficacy of stewardship plans in their districts, that should be done by the stewards and the province”

Do you have any comments regarding broadening section 29g to include a description of measures that key stakeholders have agreed to undertake to implement the plan?

A limited number of comments were received in response to this question. Several respondents requested clarification or examples from the ministry. Some respondents commented that key stakeholders (e.g., municipalities) may be reluctant to undertake particular measures without detailed information (such as cost analyses). One respondent commented that “as long as we lose some of the fluff it is a great idea”.

## 8. Compliance

Do you have any comments regarding this topic?

Respondents noted that regional districts should be compliant with the Environmental Management Act (EMA) and that a summary of the compliance avenues available under EMA, as well as the relationship between the guideline (as best practices recommendations) and mandatory EMA provisions, would be useful. Several respondents recommended that the ministry consider addressing “accountability” rather than “compliance”.

*Sample of respondent comments:*

“It would appear that the key element missing is not prescriptive versus result based but having some accountability to reducing waste and some enforcement for when nothing is done – the province should set out some key goals (based on a provincial zero waste plan), outline what the province plans to do for its role in achieving its goals and ask the regional districts what their plans are for achieving their parts”

“Encourage regional districts to attempt compliance strategies so everyone can see where plans fall apart and where they succeed”

“Will the new guideline include example of options for a compliance strategy? Will the role of regional government change?”

“The idea of a self-produced compliance strategy, again builds on the commitment idea, however it may be a major point of contention between the ministry and regional districts”

“There should be an avenue to delay fully complying with ministry requirements within the plan if it can be shown that doing so is not presently economically feasible but that ongoing effort coupled with a financial plan to comply with the requirements is in place”

## **9. Additional comments**

**Do you have any additional comments or suggestions for the ministry regarding the proposed updates to the solid waste management planning guideline?**

Many respondents provided additional comments for the ministry to consider and/or additional information in a covering letter with their response to the ministry’s questions. These comments have been compiled and passed to ministry staff for consideration. A sample of these comments is provided on the following pages.

*Sample of additional respondent comments:*

“In general, proposed updates that increase the efficiency of plan creation while reducing costs would be welcomed... [however] proposed updates for increased consultation may increase expenses, lengthen the time required to update a SWMP, and fail to achieve the desired outcome (stakeholders and the public often lack appropriate knowledge or interest to provide meaningful feedback)”

“Per capita disposal targets may not be the most appropriate measure of success for individual regional district solid waste management plans, and other possible measures/targets should be identified... without waste flow control, per capita disposal targets may have little meaning as measured disposal within a regional district may not correlate with actual disposal... regional districts should not need to rely on disposal bans in adjacent regional districts to encourage diversion, and any waste flow between regional districts should be specifically included in each regional district’s solid waste plan”

“The efforts in attempting to update and streamline the planning process for solid waste management in B.C. is very much appreciated”

“The guideline must recognize that the Waste Management Industry currently participates in a global market, and must not limit access to overseas markets, cross border international trade or interprovincial trade”

“We are concerned about the proposal that the first ministry review would only occur when the final plan is submitted for approval, as this could result in time-consuming and potentially costly delays for regional districts if the plan is not approved”

“Make incineration of MSW a non-starter... make authentic Zero Waste the key plank in this platform”

“The Intentions Paper makes reference to a number of proposed templates, schedules, checklists and criteria – we are unable to provide feedback without being able to review the actual forms and would appreciate the opportunity to review these prior to the new guideline being finalized”

“With a population of fewer than 4000 souls, and with more than half of those living on First Nations reservations, [our regional district] has a very limited tax base and an annual solid waste management budget of less than \$250,000... the undertaking of a SWMP review and update is a monumental task for our organization; one made more onerous by the, ‘one size fits all’ content of the existing SWMP guideline... Please consider adding a section near the beginning of the new SWMP Guideline that says: ‘the ministry recognizes that in certain situations, especially with small regional districts, limited resources can make many of the guideline’s processes and principles unachievable or impractical. In such instances, exemptions (or modifications to) from certain planning requirements or guiding principles can be made. Such requests shall be submitted to the Ministry of Environment and include a rationale supporting the request for a variance or modification to the guideline’ ”

*Sample of additional respondent comments (continued):*

“[Our association] agrees with the government’s objective to have a results-based focus to waste management planning and we applaud the commitment to promote the 3 R’s (Reduce, Reuse and Recycle) – we believe the approach will lead to increased diversion and realization of the province’s diversion targets... it was private industry that was first to provide waste and recycling services, to businesses and the general public. It was during the 1970’s, when the mantra of the day was to create Government monopolies that Government decided to enter the market place and compete with private industry, while implementing regulations to an open and competitive market that they were now competing in. In the 1980’s and until the last few years, Government has been focused on governing and regulating to achieve the desired results, which has allowed industry to invest, compete and drive BC’s world class diversion rates. As this investment, innovation and competition have allowed for great success in BC’s diversion rate while still providing choice to the consumer and protecting the taxpayer, it is this future update to the guideline that need to be more flexible to promote continued innovation and investment, in this sector. It is critical that Government’s role must be to govern and regulate, while the private sector innovates, invests and operates”

“[Our association recommends] that the ministry... (1) recognize the differences between the residential and industrial commercial and institutional (ICI) waste sectors, such that the residential services are linked to the tax payers almost as an essential service whereas the ICI sectors are business related and they should be allowed to have access to a competitive and innovative market; (2) ensure that public policy is not overly prescriptive so as to discourage investments in proven and innovative recycling technologies and infrastructure; (3) provide clarity on Marvin Hunt’s principle five – ‘a level playing field for both public and private companies’ in a manner that demonstrates a commitment to robust private sector participation; (4) maintain the current open market system so that businesses are able to negotiate their waste services and choose the most appropriate services for their business at competitive prices (ensure that competition-stifling measures like flow control and franchising are prohibited; (5) encourage regional districts to work with the waste services sector and generators to develop effective enforcement programs (e.g., disposal bans) to encourage compliance; (6) require open and transparent dialogue with the private waste services sector”

“Solid waste management is a service that impacts every business, regardless of size, as every business produces solid waste on some level. As the implications for solid waste affect all businesses, the framework and regulations of solid waste have the ability to impact the economic viability of businesses as their costs directly affect their bottom line. Creating a framework that allows for the greatest diversion possible, while keeping costs of waste disposal and diversion as low as possible should be goals that regional districts strive for to promote economic development across the province”

“[Our provincial network] passed a resolution with an overwhelming majority... calling on the Provincial Government to work with regional districts to: (1) structure or restructure waste management policies in a manner that(a) reduces the expenditures of the regional government on publicly-owned facilities (if they are in direct competition with private industry), and (b) promotes innovation and investment by private enterprise; (2) collaborate with all members of the commercial sector to set waste reduction & diversions goals allowing the achievement of those goals through open market processes; (3) create policies and regulations that recognize new and future recycling and waste diversion technologies as secondary processing facilities (i.e., MRFs, Recycling depots, etc. and not as final disposal facilities (i.e., landfills, incinerators, etc.); (4) reduce, amend, or annul regulation and other systemic factors that support a government monopoly or monopsony [a single customer market] of solid waste management; and; (5) directs regional governments to develop regulations in a manner that prevents the creation of government monopolies or monopsonies for solid waste management in the multi-family and industrial, commercial and institutional sector”

*Sample of additional respondent comments (continued):*

“Given the potential for varying interpretations of terms, we suggest that the Ministry develops a glossary of terms and includes them in the consultation process so that all parties garner the same interpretation of the guideline”

“Waste to energy should be eligible for consideration by regional districts at any time that it is determined to be viable and feasible (for that regional district)”

“A number of businesses that operate under stewardship programs or provide regional recycling collection remain unclear as to the ministry’s role in waste management programs in particular EPR programs. The same confusion can be said about the role of regional districts and municipalities. Businesses find themselves competing with government subsidized waste management programs. The ministry needs to make clear its role in the waste management system and how its role applies to all stakeholders”

“We call on the British Columbia Ministry of The Environment to help authentic Zero Wasters create Zero Waste Community Action Plans, for every community in BC, to replace the draconian and outdated SWMP (Solid Waste Management Plan)”

“A more sustainable approach to waste management is necessary throughout British Columbia and around the world to better protect air, water and land resources and to combat climate change. Waste can no longer be considered and treated as a problem but must be recognized and utilized as the valuable resource that it is. We believe that British Columbians highly value their natural environment and expect their governments, at all levels, to put in place the policy conditions that will facilitate and encourage a transition towards a society that minimizes waste and generates value—in an environmentally responsible way—from wastes that cannot be avoided. Many of the technologies needed for such a transition are already available and in addition, new technologies that allow to extract more value or to treat in a more sustainable way our wastes are today being developed and brought to market”

“Since the current set of solid waste planning guideline was set, many things have changed: many more communities have signed on to pursuing zero waste and several have accomplished significant waste reduction and diversion in a relatively short period of time once they committed to zero waste (e.g., San Francisco, USA; Cappanori, Italy) using systems that work in their setting; Increasing examples of success of community based social marketing as well as zero waste initiatives; increasing concern over where materials go and the environmental consequences (both for recycling overseas as well as disposal regionally); increasing concern and science around the greenhouse gas emissions associated with material flows and disposal (plus an opportunity now to work with the BC Climate Leadership team that is working to strengthen the climate action plan); for some jurisdictions, looking ahead to materials scarcity/avoiding environmental impacts and a push to move towards a circular economy; [and] looking at material flows as part of a system that needs to change instead of only focusing on waste disposal”

“We appreciate the opportunity to work with the Ministry of Environment as it makes changes to the guideline for preparation of regional solid waste management plans... our company has been working diligently for over two decades in the pursuit of providing the public with as many options as possible, a goal we are sure the Ministry shares... [we] look forward to continued discussions on the best ways to reduce waste and recycle whenever possible. “

## Appendix A: Acronyms and Abbreviations

Acronym or Abbreviation	Definition
3 R's	Reduce, reuse and recycle (part of the 5 R hierarchy)
5 R	The 5 R hierarchy prioritizes <b>reduction</b> , then <b>reuse</b> and <b>recycling</b> , then material or energy <b>recovery</b> , and after all other options are exhausted, <b>residual management</b>
B.C.	British Columbia
EMA	<i>Environmental Management Act</i>
EPR	Extended producer responsibility (set out under the Recycling Regulation)
ICI	Industrial, commercial and institutional sector
MRFs	Material recycling facilities
SWMP	Solid waste management plan
US	United States